



Angling Trust/Fish Legal

PD40a - Angling Trust & Fish Legal Risk
Management Strategy

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1 POLICY STATEMENT

The organisation recognises that risk management is essential to its governance and to sustainable operation of its services. The organisation accepts that it has a responsibility to manage risks effectively in order to control its assets and liabilities, to protect its employees and associates against potential losses, to minimise uncertainty in achieving its goals and objectives and to maximise the opportunities to achieve its vision. The organisation acknowledges that some risks can never be fully eliminated and this policy provides a structured, systematic and focused approach to managing risk.

The Risk Management Policy will ensure that all staff, Directors and associates are aware of what constitutes a hazard for the business, the process for identifying and reporting risks, the appropriate consideration, reporting and recording of risks, and that effective controls are in place either to manage, mitigate or to take advantage of those risks.

2 BACKGROUND AND PURPOSE

All organisations are subject to risk, and appropriate consideration of risk is a fundamental requirement for their successful operation and continuity. Risk management is a systematic way of identifying, analysing, evaluating and treating those risks which may provide uncertainty around an organisation's wellbeing and ability to achieve its objectives.

For the purposes of our organisation, a risk can be considered as any event or situation that threatens to impact on the finances, operations and/or reputation of the Angling Trust or Fish Legal. The risk may be financial or non-financial in nature and the degree of potential harm can vary from minor embarrassment or inconvenience to the closure of the business. While risks can all be controlled to a degree, many risks cannot be eliminated, and depending on our 'risk appetite', we may choose to put a greater or fewer number of controls in place.

Not all risks that the organisation may encounter are threats; some may be opportunities: For instance, if the Environment Agency were to ask the Angling Trust to take over the selling of Rod Licences this would have a fundamental impact on our workload but would also be a major opportunity to significantly increase our membership, and therefore our revenue.

By managing risk effectively, our organisation can ensure that:

- Significant risks are known and monitored, enabling the Directors and Senior Management Team to make informed decisions and take timely action
- Opportunities are taken and developed with confidence that any risks will be managed
- Forward and strategic planning are improved
- The value of service to members is enhanced

This policy will describe the identification of risk and the potential risks that may be encountered by the organisation. It details responsibilities for risk, includes instructions on how to assess risk, and provides details of our 'risk registers' and their monitoring and review.

3 SCOPE

This policy applies to all staff, Directors and associates and to all areas and activities of the organisation.

4 DEFINITIONS

AT- Angling Trust

FL- Fish Legal

The Organisation - Angling Trust or Fish Legal

Associate- An individual involved with or representing Angling Trust or Fish Legal. They may or may not be an employee

Risk – Primarily, an event that could happen to or within the organisation that could have a negative impact on its finances, operations and/or reputation. Some risks however, are also opportunities and could therefore have a positive impact on the organisation

Probability – The likelihood of the risk event occurring. This is currently measured as HIGH, MEDIUM or LOW with HIGH meaning that the risk is most likely to occur

Impact – The degree of harm (or benefit) on the organisation if the risk occurred. This is currently measured as HIGH, MEDIUM or LOW, with HIGH meaning that the risk would have a greater impact on the organisation in the event it occurred

Controls – (Mitigation) Specific processes, systems and policies that are in place to manage and reduce the likelihood and/or impact of the risk occurring

Residual Risk – The level of the remaining risk once the controls have been considered

Risk Assessment - A systematic method for identifying and then removing or controlling risks of any kind, that may include a Risk Matrix

Risk Matrix – Heat map diagram demonstrating the combined impact and probability of a risk before controls are considered

Risk Owner – The individual responsible for ensuring that the risk event is adequately managed Risk

Register – The document where our risks and controls are recorded

Risk Management – The process through which risks are identified, considered, reported and controlled (or exploited)

Risk Appetite – The tolerance we have as an organisation to accept and carry a risk

Strategic Plan – The organisation’s plan to deliver our aims and objectives

Corporate Governance – All processes, systems and policies we have in place that determine how the organisation is directed and controlled, how the strategic objectives are set, the basis for achieving those objectives and monitoring that performance

5 LINKED DOCUMENTS

Business Continuity Plan (PD12)
Health and Safety Policy (PD36)

6 POLICY AND PROCEDURES

6.1 Responsibilities

The AT Board/FL Committee has overall responsibility for the effective operation of this policy in terms of:

- Setting the tone and influencing the culture of risk management
- Providing support and leadership for the risk management process
- Determining the risk appetite: which types of risk are acceptable and which are not, thereby setting the standards and expectations of staff
- Monitoring the management of significant risks to reduce the likelihood of unwelcome surprises
- Reviewing the effectiveness of internal controls, including financial and organisational
- Satisfying itself that the less significant risks are being actively managed, with the appropriate controls in place and working effectively
- Annually reviewing the organisation’s approach to risk management and approving changes or improvements to key elements of its processes and procedures

A designated AT Board/FL Committee Member has responsibility for overseeing the Policy on behalf of the organisation.

The AT Board/FL Committee has delegated day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Chief Operating Officer. The key responsibilities are to:

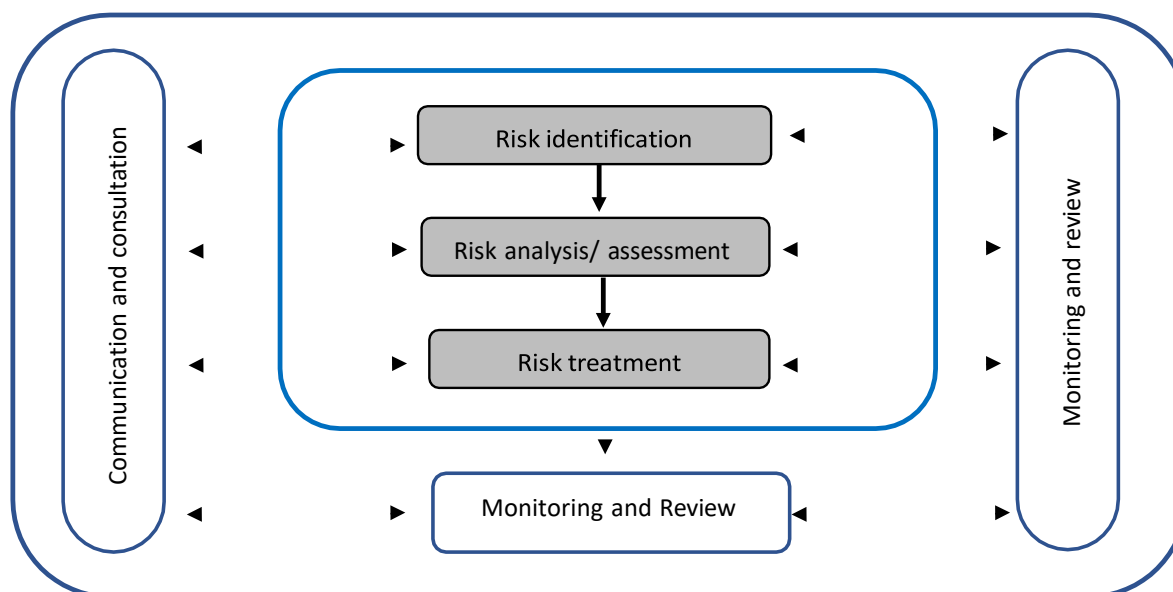
- Implement policies on risk
- Identify and evaluate the significant risks faced by the organisation
- Undertake an annual review of the risk management policy

All staff, directors and associates have a duty as part of their involvement with the organisation to do everything they can to ensure that the policy works in practice.

6.2 Risk Management Process

The organisation’s risk management process can be represented by the following flow diagram.

The Risk Management Process



6.3 Risk Identification

A risk may be identified through a variety of external and internal sources and the method can be proactive or reactive. For example:

- by simply walking around a building and looking afresh at what could reasonably be expected to cause harm (e.g. new equipment)
- performing risk assessments
- consultation with staff, directors and associates
- complaints and audits
- progress against aims and objectives
- any mandatory or statutory requirements

Risks may be identified by any staff or AT Board/FL Committee member. Risks may also be identified by external stakeholders, such as our auditors or bodies such as Sport England. Staff should not be worried about identifying a risk. It is for the good of the business as a whole for risks to be identified and reported, so that controls can be put in place to manage the risk.

AT Board/FL Committee members will have the main input into identifying the risks of the Angling Trust, consideration of appropriate controls and potential further controls.

Risks should be reported (in writing by email) to the Head of Delivery as the 'owner' of all risks, as soon as they are identified. Please include brief details of the nature of the risk and any controls of which you are aware. If you consider that there are a number of risks in your work area, please inform the Head of Delivery so that a meeting can be arranged to consider your work area specifically. Either way, the Head of Delivery will arrange to speak with you to gather more information about what you have identified.

6.4 Risk Assessment and Treatment

Risk assessment is a standard tool, used to provide a systematic method for identifying and then removing or controlling risks of any kind. Instructions on assessing and scoring risks is provided in Appendix 1 and the risk assessment form template is in Appendix 2.

The risks of greatest concern will be those that have HIGH impact and HIGH probability. Any such risks must therefore have adequate controls in place in order to reduce the impact and/or probability of them occurring and a management plan should be put in place to reduce the impact and/or probability. The AT Board/FL Committee will consider the impact and probability of each risk on a case by case basis.

Examples of potential risks, their impact and possible controls are provided in Appendix 3. **NB: these are examples only and should not be considered as actual risks affecting the organisation.**

An action plan must be agreed and implemented to manage and control any identified risks, using the following approaches:

- **Avoidance:** undertaking the activity in a different way to prevent the risk occurring
- **Reduction:** taking action to reduce the risk
- **Transfer:** movement of the risk to another individual / organisation
- **Acceptance:** the above options are not practicable, and a contingency plan is developed

When developing an action plan, consider whether all legal requirements have been met. Then, whether generally accepted standards are in place. The aim should be to eliminate risks altogether, however, it is recognised that in some instances this is not possible and in such situations it is essential that risks are reduced to the lowest level by adding to the controls as necessary.

6.5 The Risk Register

Once a risk has been identified it must be recorded on the appropriate Risk Register. If a risk is such that it has the potential to impact the achievement of the objectives of the organisation, then it should be recorded and managed via the Strategic Risk Register. Risks which are considered operational should be recorded and managed via the Departmental Risk Registers. The Strategic and Departmental Risk Registers provide an ongoing log of those risks which require further action and enable monitoring of implementation of the action plans necessary for mitigation.

Entries to the Risk Registers should include the following information as a minimum:

- the impact on a scale of 1 – 5*, should the risk become a reality
- the probability of the risk occurring, on a scale of 1 – 5*
- the details of the current controls or mitigations already in place
- any actions which can be taken to remove or reduce the risk
- how the risk will be monitored/ actions evidenced
- named responsible person/ job title
- review date

The Strategic Risk Register and departmental Risk Registers are reviewed at each Audit Risk and Assurance Committee (ARAC) and management meeting and annually by the AT Board/FL Committee. The Chief Operating Officer also monitors the register on an on-going basis.

Key risks that should be in the Risk Registers are those which impact on the organisation's ability to

achieve its objectives and/or those that would require reinstatement at short notice in the event of a disaster. These might be as follows:

- Computer system failure (consider backup, access and speed of restoration)
- Premises- (e.g. in event of flood)
- Communications (with staff and stake-holders)
- Availability of Data lists (e.g. membership)
- Access to financial systems and information
- Website

6.6 Acceptable Risk

The organisation acknowledges that some of its activities may, unless properly controlled, create organisational risks and/or risks to visitors, workers and others. The organisation will, therefore, make all efforts to eliminate risk or ensure that risks are contained and controlled so that they are as low as reasonably possible.

6.7 Review of Effectiveness

The AT Board/FL Committee, supported by the Audit and Risk Assurance Committee, is responsible for reviewing the effectiveness of risk management within the organisation, based on information provided by the Chief Executive Officer. The approach is outlined below:

For each significant risk identified, the AT Board/FL Committee will:

- Review the previous year and examine the organisation's performance in managing identified risks
- Consider the internal and external risk profile of the coming year and consider if current internal control arrangements are likely to be effective

In making its decision, the AT Board/FL Committee will consider the following:

- Control environment
- The organisation's objectives
- Compliance with legal requirements
- Financial and non-financial targets
- Organisational structure
- Culture, approach and resources in respect of the management of risk
- Delegation of authority
- On-going identification and evaluation of significant risks:
- Timely identification and assessment of significant risks
- Prioritisation of risks and the allocation of resources to address areas of high exposure
- Information and communication:
- Quality and timeliness of information on significant risks
- Time it takes for control breakdowns to be recognised or new risks to identified
- Monitoring and corrective action:
- Ability of the organisation to learn from experience
- Commitment and speed with which corrective actions are implemented

7 APPENDICES

Appendix 1- Completing a Risk Matrix

Appendix 2- Risk Assessment Template

Appendix 3- Examples of potential risks, their impact and possible controls

Appendix 1

COMPLETING A RISK MATRIX

Step 1: If the risk occurred what is the likely impact to person(s) or the organisation? Use the table below to grade the consequence.

LEVEL	IMPACT	DESCRIPTION
1	Insignificant	No injuries - No treatment /intervention required/given No loss/reduction of capacity to deliver service Low financial loss/cost
2	Minor	First Aid Treatment required/given Reduced capacity to deliver service Minor financial loss/cost
3	Significant	Medical Treatment required/given Assistance required to deal with reduced capacity to deliver service Medium financial loss/cost
4	Serious	Extensive injuries Temporary loss of capacity to deliver service Major financial loss/cost
5	Severe	Death Long term/permanent loss of capacity to deliver service High financial loss/cost

Step 2: Look at what is being assessed and ask the question: What is the probability of harm to persons or organisation, given the current controls/precautions in place? Use the table below to grade the likelihood.

LEVEL	LIKELIHOOD	DESCRIPTION
1	Very Unlikely	Not expected to happen, only in exceptional circumstances, e.g. once a decade, or a probability of <1%
2	Unlikely	May occur infrequently, but is a possibility, e.g. once a year or a probability of 1- 5%
3	Possible	May occur, e.g. once a month, or a probability of 6-20%
4	Quite Likely	Will probably occur, e.g weekly or a probability of 21-50%
5	Very likely	Likely to occur on many occasions, is a constant threat, e.g once a day or a probability of >50%. More likely to occur than not

Step 3: To obtain the risk rating, multiply the level of the impact (I) by the level of the probability (P)

		LIKELIHOOD				
		Very unlikely (1)	Unlikely (2)	Possible (3)	Quite Likely (4)	Very Likely (5)
IMPACT	Insignificant (1)	Low risk 1	Low risk 2	Low risk 3	Low risk 4	Low risk 5
	Minor (2)	Low risk 2	Low risk 4	Moderate risk 6	Moderate risk 8	Moderate risk 10
	Significant (3)	Low risk 3	Moderate risk 6	Moderate risk 9	Moderate risk 12	High risk 15
	Serious (4)	Low risk 4	Moderate risk 8	Moderate risk 12	High risk 16	High risk 20
	Severe (5)	Low risk 5	Moderate risk 10	High risk 15	High risk 20	High risk 25

Step 4: Risk Level and Action Required.

Score	Risk Preventative Measures to be Taken or Planned
1-5	Low Risk – manage by routine procedure. Implement any action that will eliminate or control the risk
6-12	Moderate Risk – may require corrective action/ action plan to reduce or eliminate the risk
15-25	High Risk – requires immediate corrective action. An action plan must be implemented immediately reduce, control or eliminate the risk

Appendix 2

RISK ASSESSMENT TEMPLATE

Step 1: Risk Identification		Step 2: Risk Assessment			Step 3: Risk Management				
Potential Risk		Impact (1-5)	Likelihood (1-5)	Initial Risk Rating (IxL)	Existing Controls <i>What are we already doing about it?</i>	Current Risk Rating (IxL)	Future Actions <i>What more can we do about it? (Avoid/ reduce/ transfer/ accept)</i>	Risk Owner	Residual Risk Rating (IxL)
Description	Cause								

Completed by.....(Draft for discussion by the AT Board/FL Committee)

Date:

Appendix 3

EXAMPLES OF POTENTIAL RISKS, THEIR IMPACT AND POSSIBLE CONTROLS		
POTENTIAL RISK DESCRIPTION	POTENTIAL IMPACT	CONTROLS
External/ Environmental Factor Risks		
Public perception	<ul style="list-style-type: none"> Impact on voluntary income Ability to access grant 	<ul style="list-style-type: none"> Communicate with supporters Ensure good quality reporting on organisational activities Implement public relations procedures
Adverse Publicity	<ul style="list-style-type: none"> Loss of reputation Loss of members Impact on morale 	<ul style="list-style-type: none"> Implement complaints procedures Agree a crisis management strategy – including consistency of key messages Agree a nominated spokesperson
Government policy	<ul style="list-style-type: none"> Impact of general legislation or regulation of activities undertaken 	<ul style="list-style-type: none"> Monitor proposed legal and regulatory changes
Financial Risks		
Inadequate reserves/Cash flow	<ul style="list-style-type: none"> Inability to meet commitments Impact on operational activities 	<ul style="list-style-type: none"> Identify major sensitivities Ensure adequate cash flow projections
Fraud or errors	<ul style="list-style-type: none"> Financial loss Reputational risk Regulatory action Impact on funding 	<ul style="list-style-type: none"> Review financial controls Set authorisation limits Agree whistleblowing and fraud policy Review security of assets
Inaccurate and/ or insufficient financial information	<ul style="list-style-type: none"> Uninformed decision making 	<ul style="list-style-type: none"> Review financial information processes
Insufficient insurance cover	<ul style="list-style-type: none"> Exposure to uninsured loss 	<ul style="list-style-type: none"> Annual Review of insurance cover
Governance Risks		
The organisation lacks direction, strategy and forward planning	<ul style="list-style-type: none"> The organisation drifts without clear objectives Issues are addressed piecemeal without strategic reference Financial management difficulties Loss of reputation 	<ul style="list-style-type: none"> Create a strategic plan, which sets out key aims, objectives and policies Monitor financial and operational performance
Inappropriate organisational structure	<ul style="list-style-type: none"> Insufficient capacity to deliver against objectives 	<ul style="list-style-type: none"> Review and agree structure required
AT Board/FL Committee and Management lacks relevant skills or commitment	<ul style="list-style-type: none"> Poor decision making AT Board/FL Committee cannot operate effectively as a strategic body 	<ul style="list-style-type: none"> Review and agree skills required Review and agree recruitment process
Conflict of Interests	<ul style="list-style-type: none"> Organisation unable to pursue its own interests and agenda Decisions may not be based on relevant considerations Impact on reputation 	<ul style="list-style-type: none"> Agree protocol for disclosure of potential conflicts of interest Implement procedures for conflict of interest management
Legal Compliance		
Poor knowledge of the legal responsibilities of an employer	<ul style="list-style-type: none"> Employment tribunal 	<ul style="list-style-type: none"> Review of employment conditions
Poor knowledge of regulatory requirements	<ul style="list-style-type: none"> Inappropriate fundraising activities 	<ul style="list-style-type: none"> Review of activities against regulations
Health and Safety Risks		
Poor housekeeping	<ul style="list-style-type: none"> Slips, trips and falls Impact on reputation 	<ul style="list-style-type: none"> Review housekeeping practices
Operational Risks		

Member dissatisfaction	<ul style="list-style-type: none"> Complaints 	<ul style="list-style-type: none"> Implement robust complaints procedure
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EXAMPLES OF POTENTIAL RISKS, THEIR IMPACT AND POSSIBLE CONTROLS		
POTENTIAL RISK DESCRIPTION	POTENTIAL IMPACT	CONTROLS
	<ul style="list-style-type: none"> Loss of reputation 	<ul style="list-style-type: none"> Benchmark services Communicate with members Implement public relations procedures
Capacity and use of resources	<ul style="list-style-type: none"> Estate Equipment obsolescence 	<ul style="list-style-type: none"> Agree organisation requirements
Security of assets	<ul style="list-style-type: none"> Loss or damage Theft of assets 	<ul style="list-style-type: none"> Review security arrangements Create asset register and inspection programme
Poor staff recruitment and training	<ul style="list-style-type: none"> Unsuitable workforce 	<ul style="list-style-type: none"> Review recruitment and training policies