



Risk Management Policy

Policy Lead	Executive Officers
Audience	Anyone who engages with the Grassroots Trust
Formally endorsed by	Trustees
Last updated	November 2024
Next Review	November 2027

1. Policy Objective

Risk in this policy describes the uncertainty surrounding events and their outcomes that may have a significant impact, either enhancing or inhibiting, on any area of the charity's operations.

The Charity Commission strongly recommends that charities have a clear risk management policy and process. The charity should have a structured approach to risk management that is appropriate for its size and complexity.

The objective of this policy is to provide guidance on managing organisational risk to support the achievement of strategic objectives, protect beneficiaries, staff and business assets and ensure business operations and financial sustainability. The policy objective is to provide a framework to:

- Define risk governance
- Identify principal risks
- Assess priority risks
- Develop mitigating strategies and actions
- Monitor and review risk activities
- Communicate and report risks

The policy design and section headers are in line with Charity Commission guidance, Charities and risk management (CC26), and UK corporate governance requirements, FRC risk guidance (2014).

2. Risk Governance

Role	Responsibility
Trustees	Trustees are required to identify and review the strategic, operational, regulatory, people, political and environmental risks to which the organisation is exposed and to assess the likelihood of such risks and the possible level of impact they would have. Trustees must be satisfied that risk management is embedded in the organisation and adequate systems are in place to monitor, manage and, where appropriate, mitigate the Grassroots Trust's exposure to the major risks.

Executive Leaders & Safeguarding officer/s	Detailed review of the risk, feedback, complaint and accident logs.
Executive Leaders, Mission Team Leaders and Safeguarding officer/s	Comply with risk management policy and processes and foster an environment where risks can be identified and reduced to a minimum. Review of reports, issues and actions. Discuss and decide as to whether risk alleviation policies need to be introduced, amended or replaced in light of external events or operational challenges. Promote risk management processes throughout the organisation and encourage transparency in reporting and speedy issue and risk escalation.

3. Risk Management Policy - overview

Risk is embedded within the organisation and risk management is factored into all the organisation does and all projects/partners that it supports. All projects and team leaders look at risks specific to their particular context and those managing the relationship between Grassroots and its local partners develop specific policies and methods of risk management and feedback appropriate to the situation. Risks that could have a major impact on The Grassroots Trust operations, fundraising and reputation are those reviewed by trustees, executive leaders, staff, mission team leaders and in discussion with partner organisation leaders.

There are myriad risks to which Grassroots is exposed. These include risks in these areas:

- a) Financial
- b) Safeguarding
- c) Operational – in particular as this relates to mission teams and others travelling for/with Grassroots to visit our partners around the world
- d) Legal and Regulatory
- e) Political and Environmental

Two Points:

- i) The purpose of introducing categories is to stimulate thinking and ensure that a comprehensive list of potential risks is developed. Categorisation is not an exact science and there is some debate over whether people risks or reputational risks should be included separately, but we feel that all risks relate to people and reputation and therefore these should be understood to be included in the other areas of risk management.
- ii) The priority level risks change quite often. Changes in regulations around data protection and processing have lifted the level of priority of risks relating to this. Media coverage of failures among other charities in areas of safeguarding have meant evolution of new policy and methods of implementation have become a high priority for all charities. While these are currently regarded as the highest priorities, other areas may rise up the priority list in the future. The following detail reflects the present priorities, but continuous evaluation and amendment will almost certainly prove necessary to keep this policy current.

4. Risk Alleviation Policies/Methods

a) Financial

- i) **Fraud** – The charity incorporates a series of financial controls – including requirement for 2 signatures on cheques, maximum limits on transfers from bank accounts, requirement for submission of receipts and explanations for all expenses, review of all payments to staff and project leaders by a designated trustee, auditing of accounts, auditing of partner project accounts, protocols for the carrying and passing on of cash and many other well established practices.
- ii) **Banking** – UK banks carry out regular reviews of charities and threaten to freeze accounts or withdraw banking facilities if the charity does not have policies and practices that meet their standards. Grassroots has passed these tests on an annual basis in recent years but is aware that there is a risk of having account frozen while investigations take place. As a result of this Grassroots has accounts with a number of banks so that there will always be available funds for immediate needs. The wider risk of having banking services withdrawn would damage the charity's income and reputation as many supporters give by standing order, and therefore it is a high priority to keep a good reputation with the banks where we have accounts and so respond promptly to their requests for information so there should never need for them to take action and withdraw services either temporarily or permanently.
- iii) **Sending of Funds to partner organisations** – Funds may be transferred either to bank accounts or as cash (where bank accounts are not possible and always done with appropriate handing and receipt policy). This will only happen with a strict regime and agreement of budget and allocation of the funds being sent. After funds are sent for an agreed budget the partner organisation has a duty to account for the use of the money and to demonstrate both in their accounts and in the outcomes (money received by beneficiaries or spent on agreed goals) that the money was used in line with the budget.
- iv) **Use of Cash** – Since cash is vulnerable it should be used as little as possible and in as small quantities as possible. If carried by a group, cash belonging to Grassroots should be split into small portions and carried as securely as possible in hand luggage. Those who receive cash in these contexts should give receipts when they receive it and receive receipts when they hand it on. Quantities of cash carried, ways of carrying cash and declarations of cash carried should always be in line with the law of the country being travelled through at the time.
- v) **Loss of Funds** – All losses or discrepancies in quantities of funds (whether in cash or in bank accounts) will be investigated thoroughly. If there have been mistakes, then a review will be held and protocols established to help avoid similar mistakes in the future. If there has been dishonesty then a review will be undertaken and an appropriate response to those responsible will happen (eg: report to local authorities, remove from the role of responsibility, etc) and protocols established to make it less possible in the future.
- vi) **Fundraising & Reputation** – as a charity Grassroots is dependent on donors' confidence and trust for our income to be secure. We therefore must continuously do everything necessary in order to maintain that. This includes remaining transparent regarding our use of money and other practices, responding to feedback/complaints promptly, managing our advertising and other information available to the public (website, social media, press releases, media reports, photographs, mailings, use of data, etc) and our day to day activities so they always reflect the high standards that we aspire to and as outlined in our Code of Conduct. In the case of a major incident we will act quickly to fulfil our Major Incident Policy - as outlined below.
- vii) **Those Under 18 years old** – for all those under 18 years old permissions and disclaimers will be signed by their parent or guardian. Other policies relating to those

under 18 years old are outlined in the Grassroots Trust Safeguarding Policy.

- b) **Safeguarding** - The Grassroots Trust has a Safeguarding policy, Code of Conduct, Complaints and Feedback Policy and other policies which guides all the trust does and outlines the logging processes required in order to reduce the risks faced by those involved with or served by the Grassroots Trust.
- c) **Operational 1** – Mission Teams/other Operational Trips with Grassroots Representatives
- i) **Mission Teams Application and Vetting** – those wishing to join a mission team as a volunteer need to complete an application/disclaimer form, complete a health declaration, provide a reference and a standard DBS check (in line with the Grassroots Trust Safeguarding policy). If there any concerns staff will refer the concern to executive leaders, trustees or independent experts before making a decision whether their application will be accepted. Once accepted, a team member must provide the in-country expenses (from local travel, food and accommodation) and commit themselves to purchase any air tickets, inoculations, medicines, travel insurance and visas that are required.
 - ii) **Before Mission Teams travel** – each team member must receive an orientation briefing (preferably at an orientation event or over the phone/video call) where they will be informed of any risks that expected to be part of the trip and given strategies to alleviate those risks. Where appropriate the team leader will ask each team member to sign and date that they have received the orientation briefing and are aware of the risks outlined in the session. Each team member must also read the Grassroots Trust Code of Conduct, Safeguarding Policy, Commitment to Protecting Children, Complaints Concerns and Feedback Policy, and other policies relevant to the trip. Where appropriate team leaders will ask team volunteers to sign and date copies of the policies to confirm they have read them and are happy to abide by them while serving with Grassroots.
 - iii) **During Mission Teams travelling** – on arrival at each point on the trip journey (accommodation, transport, meeting place, etc) the team leader (and/or risk management leader) will “walk around” and check on risks and strategies for alleviating them (EG: fire, fire alarms or equivalent, escape routes, meeting points, vehicle maintenance, driver ability/qualification/concentration, how to make vehicle seating safe, dangerous bits of roads, dangerous parts of activities, animals/insects, diseases, need to wash or cleanse hands, etc) and will write this in the risk log book and then inform the team members. Team members must then sign the risk log to confirm they received and understood the information/briefing. This process should be repeated at regular intervals (normally daily) even if the list of risks remains the same.
 - iv) **Food and Allergies** – team members with allergies or other dietary needs must declare them on the health declaration during the application/vetting process. Team leaders must refer any declared and check whether it is possible for the team member to safely travel and eat during the trip. If the local situation cannot cater for their dietary needs then the team member cannot be allowed on the trip. If the local situation can provide but there is still a high risk of illness that would be hard to treat in the situation and hard to travel to treatment in the likely timescales, then a decision has to be referred to executive leaders, trustees or independent experts as to whether the person may join the team.
 - v) **Travel Insurance** – all team members must have travel insurance that covers all the activities they are going to be involved in for all overseas mission teams. This insurance must cover all pre-existing medical conditions and for repatriation if needed, including cover for the repatriation of their body in the event of their death. (The Grassroots Trust

- has public liability, employer's liability and trustees' indemnity to cover risks for team activities in the UK)
- vi) **Purchasing Air Tickets** – Grassroots will only purchase tickets for staff and others who are travelling at the charity's expense. All other team members need to buy their own tickets, having received a briefing about the time they need to arrive to connect with ongoing transport. Team leaders can only suggest what tickets to buy and must leave final decisions of which flight to buy and who to buy them from to the team member. Team leaders will make team members aware that any risk of flight providers changing times of flights or going into liquidation is the responsibility of the team member and not of Grassroots.
 - vii) **Inoculations and Antimalaria medicines** – team leaders must make team members aware if there are risks of disease in the situations where the team is travelling and tell the team members to receive medical advice as to which inoculations or medications they should have before travelling. Team members should then check with the team members the advice they have taken, the inoculations they have had and the medications they intend to take. If for any reason the team leader is unhappy with the team members plan (eg: if a team member informs the team leader that they have decided not to take antimalarial medicine) the team leader should inform them they may not be allowed to travel and refer the matter to the executive leaders, trustees or independent expert. If this occurs while travelling, the team leader may be given the instruction that if the team member will not comply with good medical practice that the team member will have to return home immediately at their own expense.
 - viii) **Use of Cars, Buses and other Vehicles by those on Mission Teams** – each team member will sign an application/disclaimer form as follows: "If I bring my driving licence and drive any vehicle it is completely my responsibility to make sure I am insured properly, and not the responsibility of Grassroots. I also understand that whether I travel in a vehicle driven by myself or someone else it is my choice and my responsibility to consider whether the vehicle is road worthy, the driver competent and the time/route safe. None of this is the responsibility of the Grassroots Trust or any group leader, whether staff or volunteer." Team leaders should emphasise this (and the fact that it is the right and responsibility of the team member to express any concern they have at the time) at the orientation briefing and again whenever team members are about to travel in a vehicle during a trip.
 - ix) **Travelling with groups organised separately from Grassroots (eg: school groups, church groups, individuals, etc)** – when representatives or Grassroots mission teams travel with other groups that are being organised separately (even when they are going to serve with the same local partners as the Grassroots people) then the Grassroots representatives may not give the other group advice of any kind or act as a service provider for the other group.
 - x) **When Travel Arrangements Go Wrong** – travel arrangements sometimes do go wrong. (eg: flights sometimes get rerouted/postponed/cancelled, vehicles break down or have accidents, food is not prepared when expected, paperwork and luggage sometimes gets lost, people do get sick or have accidents, groups get separated, etc). In all circumstances team leaders will do their best to help team members resolve issues but they will never take verbal or written responsibility for anything that is not the clear responsibility of the Grassroots Trust. Team leaders will also make every effort to inform the Grassroots Trust UK office and receive any advice and support that is possible.
 - xi) **Team Member Bad Behaviour** – if a team member should act in such a way as to contravene the Grassroots Trust's policies or "Code of Conduct" then the team leader should inform The Grassroots Trust executive leaders and Safeguarding Co-ordinators at the UK office. Having informed them they should agree a course of action on the basis of the Grassroots Trust's Safeguarding Policy and Code of Conduct – options,

depending on the nature of the behaviour, may include confronting or not confronting the person, warning the person and explaining how many warnings before being suspended from serving or being sent home at their own expense, reporting or not reporting the person to wider authorities. Although it is important not to overreact, it is also important not to overlook the first signs of behaviour that is more harmful.

- xii) **Major Incidents** – when things go wrong, they sometimes need to be considered “major incidents”. Once mission team leaders (or whoever represents Grassroots in the situation) have informed the Grassroots Trust executive leaders or safeguarding coordinators about an incident, a decision can be made to declare it a major incident. This should always be the case where a person has been harmed or the charity’s reputation is at risk. In these circumstances all trustees should immediately be informed – where necessary this can be in person or on the telephone – and an action group gathered to make ongoing decisions together. These decisions could include giving instructions to those in the situation, release of funds to help, drafting and sending reports to wider authorities (Police, The Charity Commission, etc), seeking advice, contacting insurance companies, releasing information/media or press releases, recalling the team, evaluating responsibility/liability, etc.

c2) Operational 2 - Reporting and Logging of Risk Awareness/Accidents/Complaints/Feedback

- In addition to all written above, all Grassroots Trust representatives and volunteers need to regularly assess if there is a risk involved in the part of Grassroots work that they are doing. These should then be reported in writing to the safeguarding coordinator (or executive leaders) for **logging, evaluation, response and possible change of policy**.
- All accidents should be reported in the same way and the logged, dated and filed. All accidents should also be considered a report of a possible risk and treated as above.
- The way the Grassroots Trust handles Complaints, Concerns and other Feedback is outlined in the policy, “Grassroots Trust – Complaints, Concerns and Feedback policy”.

d) Legal & Regulatory

It is the Grassroots Trust’s policy to adhere to all laws and regulations in the countries where the charity operates. In addition to this the trust is committed to alleviating legal and regulatory risk by working to do all it does with due diligence and compliance to good practice. In particular relating to:

- Insurance – The Grassroots Trust trustees will regularly review that the charity is comprehensively insured.
- Legal – Whenever considered necessary the Grassroots Trust will request legal advice. We are also committed to ongoing risk assessment and the informing of those risks to all involved. Where appropriate the charity requires individuals to sign documents confirming that they are aware of risks they are likely to encounter and have entered into the role or act of service understanding that it is done at their own risk.
- Data Processing – The Grassroots Trust “Privacy Notice” and “Data Processing Policy” and the practice of how Grassroots acts on these policies will be constantly reviewed and updated so that the charity is compliant to UK law, local law and good practice.
- Governance – the Grassroots Trust is governed by the charity’s trust deed. All the charity’s governance practices are in line with the trust deed.
- Financial and Reporting – the Grassroots Trust finances and accounts are reviewed by an independent accountant and presented to the Charity Commission (and OSCR) by the due

date each year. An annual report from the trustees is also submitted to the Charity Commission annually. These documents and the list of the current trustees is displayed on the Charity Commission for England & Wales website and can be viewed by searching for charity number 1060034 here: <https://www.gov.uk/government/organisations/charity-commission>.

e) Political and Environmental

- When travelling outside the UK or partnering with local organisations there is always a risk that local political matters, international political disagreement or groups committed to acts of violence could put the Grassroots Trust's operations or people at risk. Even in the UK, political change or upheaval could mean risks for the charity.
The Grassroots Trust is committed to monitoring these issues and making decisions based on what we learn as to whether we can operate safely in those areas/countries. In particular we monitor the UK Foreign Office website and if there is specific advice not to travel, under any circumstance, in a particular area or country then Grassroots will cancel any plans to travel there. Where the advice is less specific Grassroots will evaluate the circumstances and make informed decisions on whether to travel/operate there or not. If specific risks are identified in travel that can be alleviated by changing plans, receiving training/advice/help or getting permissions, then these will be obtained prior to travelling/operating in those areas.
- Another set of risks Grassroots is aware of relates to the environment, climate change, weather or other risk of natural disaster (eg: earthquakes, tsunamis, lack of food/water, etc). All these risks will be monitored, evaluated and decisions taken before deciding to travel/operate in an area deemed to be at risk.

5. Risks Management of Local Partner Organisations

- While the practise and policies of our partner organisations, particularly when they are based and regulated in countries outside the UK, are not the direct responsibility of The Grassroots Trust, **the way they operate can be a risk both to the reputation of Grassroots and of people who are recipients of the donations and services Grassroots provides.**
- In recent months UK charities have been unsure to what degree they are responsible for the policies and practices of local, non-UK based partner organisations, but most agree it is right to protect the people who receive and provide services from identified risks to the same level as those serving or receiving services in the UK. In this context **Grassroots is working towards the goal of all local partner organisations being trained in good practice regarding governance, financial management, risk management, safeguarding, complaints procedure, receiving consent/processing of data, codes of conduct, etc.**
- Where our partnership with a local organisation requires a particular practice for Grassroots to be compliant with our policies and UK law, then we make compliance by the local organisation a requirement for receiving funds.
- Where compliance to good practices is essential for the safety of individuals (recipients of Grassroots funded services or those who serve by delivering those services) we make that compliance a pre-requisite for receiving funds.
- The process of communicating these issues to our local partners is ongoing.

Who should I reach out to if I want to discuss this policy or its application?

If you have any general queries about this Code, in the first instance we would encourage you to reach out to the charity's executive leaders – Sharon & Hugo Anson. Beyond that, please reach out to those with safeguarding responsibility as follows:

- Andrew Myall – responsible for safeguarding administration
- Mark Price – Chair of Trustees

Beyond that you can contact any of the Grassroots trustees.

The Grassroots Trust

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