RISK MANAGEMENT POLICY AND ANALYSIS

SNAPS YORKSHIRE CIO
July 2026

Introduction

SNAPS Yorkshire CIO (SNAPS) faces numerous risks that have the potential to disrupt or prevent the charity from providing its service to its users. It is vital that SNAPS identifies and manages the probable and possible risks that it may face in its lifetime. SNAPS aims to use Risk Management to minimise disruption and improve the probability of achieving its operational objectives.

Purpose of this document

This document is a formal acknowledgment of the commitment by SNAPS to managing identified risks. The aim of the document is to define an appropriate Risk Management Policy, and to ensure that significant risks are identified and monitored, enabling Management, the team, and the Trustees to make informed decisions and take timely action. The document aims to ensure that every effort is made by SNAPS to manage risk appropriately, to maximise opportunities and minimise any adverse effects of risk. This will enable the charity to develop and grow further, with the confidence that any present and future risks will be managed to the best our ability, and that the charity's aims continue to be achieved as successfully as possible.

Objectives of the Policy

- To affirm and communicate the charity's commitment to Risk Management so that it is clear and available to all those involved with SNAPS
- To identify and assess as many risks as possible that apply to SNAPS and plan for the management of those risks
- To ensure a consistent approach to managing risk for all of SNAPS' activities and establish a reporting protocol
- To assign accountability to management and the team, and to trustees for the management of risks within their area of control

Policy Statement

SNAPS is committed to the management of identifiable risk and recognises that it is fundamental to good management practice and a significant aspect of governance. Risk Management must be an integral part of SNAPS' decision making and should be incorporated into the strategic and operational planning process at all levels. Effective Risk Management will contribute towards achieving SNAPS' operational objectives and help the charity to deliver a quality service to its users.

SNAPS will ensure that management, the team, and trustees are aware of the principles of Risk Management and their responsibilities to implement Risk Management. Risk assessments will be completed for new activities including projects, processes and systems. Any risks identified will be analysed and reported to the appropriate person so that a plan can be established for the management of that risk.

SNAPS will regularly review and monitor the effectiveness of the Risk Management process across the charity with the aim of achieving a consistent basis for measuring, controlling and reporting risk.

The responsibility for the strategic direction of SNAPS lies with the trustees; therefore, their involvement in key aspects of Risk Management is essential. The risks should be appropriately delegated to the team for day-to-day management, while trustees are responsible for reviewing the processes and considering results. All staff will have a significant role in the management of risk, particularly within their area of control. Management and the team are responsible for, and have accountability for, adherence to the principles of this policy.

The Risk Management strategy consists of:

- Identifying the risk
- Determining who has responsibility for that risk
- Assessing what current controls are in place
- Considering the likelihood of the risk occurring with the current controls
- Deciding whether further controls are necessary

- Implementing any additional controls required

SNAPS will use a risk model to define the likelihood and impact of risks that could disrupt the charity. '**Impact'** refers to the severity of the risk and **'likelihood'** refers to the frequency or probability of the risk occurring. Each of these is given a rating which produces a net risk. These will be categorised by a traffic light system i.e. green for low, yellow for medium and red for high. Any red risks must be reported to the Chief Executive for explicit review. The Risk Management strategy will be reviewed and monitored regularly by Management and the Board, and updated as and when it is considered appropriate.

The role of the Trustee Board

- To ensure that a culture of Risk Management is embedded throughout SNAPS
- To set the level of risk appetite and risk tolerance for the organisation as a whole and in specific circumstances
- To communicate the charity's approach to risk and set standards of conduct expected of the team
- To ensure Risk Management is included in the development of business plans, budgets, and when considering strategic decisions
- To approve major decisions affecting the charity's risk profile or exposure
- To satisfy itself that less fundamental risks are being actively managed and controlled
- To regularly review the charity's approach to Risk Management and approve any changes to this

Risks Identified

The potential risks that could impact on SNAPS have been identified and set out below. These risks have been separated into five broad categories which cover various aspects of the charity: Governance, Operational, Financial, External Threats, and Compliance with laws and regulations, broadly following formats suggested by the Charity Commission. Further information about the potential risks within each of these areas is set out below and in the attached risk assessment template.

Governance

This will include issues relating to the Constitution, the Board of Trustees, the skills, experience, competence and contribution of individual Trustees, any conflicts of interest and concerns with organisational structure. The identified potential risks are set out in appendix 1 below.

Operational

This will include all issues relating to the day to day running of the charity which includes any issues with our sites; Penny Field SILC and Brierley SILC, Family Support and other activities wherever they occur, staffing and IT. The identified potential risks are set out in appendix 2 below.

Financial

This will include all issues relating to the financial stability of the charity, reporting of the current financial position, concerns over levels of income and expenditure, insurance, loss or breach of financial data and financial fraud. The identified potential risks are set out in appendix 3 below.

Environmental and External Threats

External threats largely relates to matters outside of SNAPS' control such as sudden increased demand for our services, changes in the economic, legal, regulatory and political environments, issues within the charity sector (particularly in Leeds and West Yorkshire), natural disasters and pandemics. The identified potential risks are set out in appendix 4 below.

Compliance with Laws and Regulations

This will include any issues relating to SNAPS' legal responsibilities as an employer, ensuring that SNAPS is compliant with Charity Commission, GDPR, Information Management, Health and Safety, safeguarding, Financial and other regulatory requirements. The identified potential risks are set out in appendix 5 below.

Review of the Risk Management Policy and details

The Risk Management document and detail will be reviewed by the Board of Trustees and the Chief Executive on an annual basis, at the November Board, ahead of the drafting the Business Plan for the new financial year.

Appendix 1 - Governance Risk Assessment

Risk identified	**Risk assessment**		**Managing risk**		
List of possible risks	**Likelihood**	**Impact**	**Measures in place**	**Responsibility**	**Review of risk**
Resignation of multiple Trustees resulting in inability of the Board to make decisions	Low	High	The Board of Trustees aim to maintain near the maximum number of Trustees allowed (12). Aim to keep number of Trustees above 9. Board to actively identify any suitable candidates.	Chair Board of Trustees	Annual
Conflicts of interest for a Trustee	Low	Medium	Trustee to declare conflict of interest and this is formally recorded. Reviewed at each Board Meeting. Avoid or remove the conflict of interest where possible. Remove Trustee from any meetings or	Board of Trustees	Annual

			decision making process relating to that conflict. Board to demonstrate any decisions made that are connected to the conflict of interest are made in the best interest of the charity. Any Trustee that fails to declare any benefit or conflict of interest should be considered for removal from the Board of Trustees.		
Sudden resignation of key Trustee without clear, immediate replacement i.e. Chair, Treasurer	Low	High	Vice Chair appointed to ensure continuity of the Chair’s responsibilities for an interim period Board of Trustees identify suitable replacements for any key vacancies. Consider whether ‘back-up’ Treasurer is required in order to ensure minimal disruption. Presence of Finance Manager mitigates against issues resulting from loss of Treasurer.	Board of Trustees	Annual

Key Trustee reaches end date of their period of service of 3 x 3 years plus.	Medium	High	Forward planning to ensure a smooth transition.	Chair / Vice Chair	Annual

Appendix 2 - Operational Risk Assessment

Risk identified	**Risk Assessment**		**Managing risk**		
List of possible risks	**Likelihood**	**Impact**	**Measures in place**	**Responsibility**	**Review of risk**
Pool breakage leading to cancellation of sessions	Low	Medium	Hydrotherapy lessons cancelled and families informed with as much notice as possible. Refunds to families for any lessons paid for and cancelled.	Children's Services Manager Chief Executive Finance Manager	Annual
Soft play/Hall equipment failure or breakage	High	Low	Any faulty equipment to be reported to site manager. Equipment removed so inaccessible to users to prevent injury or further damage.	All staff on site Children's Services Manager	Weekly by staff

			Equipment either repaired (if possible, safe and financially suitable), replaced (if financially suitable) or permanently removed.		
Staff sickness resulting in shortage of staff	Medium	Medium	Children's Services Manager to determine whether all services can continue for that session. If staffing levels are too low, certain sessions or areas to be cancelled or closed to ensure safety of all users can be guaranteed. If sessions are cancelled, families informed as soon as possible and refunds offered.	Children's Services Manager Chief Executive Finance Manager	Annual
Rebound equipment failure	Low	Medium	Rebound lessons cancelled and families informed with as much notice as possible. Refunds to families for any lessons paid for and cancelled.	Children's Services Manager Chief Executive Finance Manager	Annual
Flood/loss of power / unavailability of sites	Low	High	Site to be closed to staff and users as not suitable to be accessed.	Chief Executive	Annual

			Families and staff informed at earliest time by staff, Children's Services Manager and Chief Executive. Offer opportunity for families to attend second site at alternative location for stay and play access, if there is space available. Refunds offered for any sessions cancelled and paid for. If long term closure, explore possibility of extending offering at another site and asking staff if they can work out of that site to maximise offering to SNAPS' users.	Children's Services Manager Board of Trustees if long term closure Finance Manager	
Loss of internet access/ IT access on site	Low	Medium	Staff to ensure all records for that session are recorded by hand – access to paper back up at each site required. When IT access resumed, staff to transfer paper record to electronic system.	Site Manager All staff Children's Services Manager	Annual

			All paper records to thereafter be confidentially destroyed.		
Substandard staff performance/ delivery	Medium	Medium	All staff to be interviewed prior to commencement of employed to ensure they are suitable for the role and DBS checked. All staff to undergo any relevant training for their role. Regular 1-to-1s with staff for continual development. Annual performance reviews to manage any issues and improve staff delivery. SNAPS must have a clear and robust disciplinary process which may result in termination of employment if staff are unable to meet requirements of the role.	Children's Services Manager Chief Executive Board of Trustees	Annual
First aid emergency and arrangements	Medium	Medium	All sites to have fully equipped first aid box accessible to staff.	Site Manager	Annual

			Each site to have at least one member of staff responsible for first aid incidents at the site with first aid training. All staff to be aware of appointed first aider.	Children's Services Manager Chief Executive Team Members	
Use of Artificial Intelligence (AI) systems leading to unintended consequences, errors or reputational harm (e.g. bias in decision making, inappropriate communication, data misuse or system failure).	Medium	High	All administrative employees use Microsoft Copilot 365 as the primary AI tool to leverage its confidentiality rules and protective measures, such as Microsoft's Copyright Commitment. Complete the AI Tool Assessment Form before implementing any other automated decision making tools. Ensure human oversight is maintained for all AI-supported decisions. Provide staff training on responsible and ethical use of AI.	Chief Executive Data Protection Lead Board of Trustees	Annual, or upon introduction of new AI systems.

			Maintain transparency with stakeholders about how AI is used. Regularly audit AI systems for fairness, accuracy and compliance with GDPR and Charity Commission guidelines. Establish a clear process for reporting and responding to AI-related incidents.		

Appendix 3 - Financial Risk Assessment

Risk identified	**Risk Assessment**		**Managing risk**		
List of possible risks	**Likelihood**	**Impact**	**Measures in place**	**Responsibility**	**Review of risk**
Budget overspends leading to depletion of funds	Low	High	Annual budget set with checks from Treasurer and Trustees. Full financial reporting every 2 months to each Board Meeting. Any expenditure above £5,000 control limit on invoices to be signed off by Treasurer or Chair. Independent examiner verifies Annual Accounts.	Board of Trustees Treasurer Chair Chief Executive	Bi-monthly Board Meeting and Annual Accounts
Loss of funding	Low	High		Board of Trustees	

			Regular review of fundraising activities including opportunities to diversify funds. Exploring new fundraising opportunities through community fundraisers. Regular reporting to Trustees.	Chair Chief Executive Fundraisers	Bi-monthly board meeting
Loss of financial data	Low	Medium	Usage of cloud software for transactions which is backed up multiple times per day. Annual review of compliance with GDPR 2018.	Treasurer Board of Trustees Chair Chief Executive	Annual
Financial fraud	Low	Medium	Regular financial reporting and controls in place: Approval of invoices up to £5,000 by Chief Executive. Approval of invoices over £5,000 by Chair / Treasurer.	Treasurer Chair Managers Board of Trustees	Annual

Cash needs to be available but is largely held in notice accounts	Low	High	Time sheets signed off by Chief Executive or relevant Managers, as appropriate. Bank statement transactions reviewed by Treasurer. Security ensured regarding bank cards / code/pin calculators used for setting up and releasing bank payments, and PINs of individual holders. 3-4 months cash should always be held in easily accessible accounts Finance Manager to monitor on a monthly basis Treasurer and Finance Manager to discuss at bi-monthly pre-board meetings.	Finance Manager Treasurer	Bi-monthly meeting between Treasurer and Finance Manager

Appendix 4 - Environmental and External Threats

Risk identified	Risk Assessment		Managing risk		
List of possible risks	**Likelihood**	**Impact**	**Measures in place**	**Responsibility**	**Review of risk**
Global pandemic resulting in closure of services	Medium	High	Developing an overall plan covering all eventualities, having learned from the 2020-2021 COVID / lockdown experiences. All sites to be closed for safety of staff and users, communicating closure or alternations to services to staff and users. Where possible services to be moved to an online platform, team to work remotely where possible.	Board of Trustees Chief Executive	Annual

			Reserve funds to cover any ongoing overheads such as staff wages.		
Sudden increased demand for service	Medium	Medium	Clear capacity limits for each site and each activity with staff to users ratio. Staff to be aware of capacity limits and ensure that this is adhered to. All structured sessions are booked in advance to limit numbers accessing the services. Waiting lists and booking systems to be used if there is a regular increased demand for the services.	Site Manager All staff Chief Executive	Annual

Appendix 5 - Compliance with Laws and Regulations

Risk identified	**Risk Assessment**		**Managing risk**		
List of possible risks	**Likelihood**	**Impact**	**Measures in place**	**Responsibility**	**Review of risk**
Breach of GDPR and data protection compliance, including through the use of AI systems that process personal data without appropriate safeguards.	Medium	Medium	Use of Charity Log for storing all SNAPS' data which is a secure data site. Team fully trained in use of Charity Log and aware of responsibilities. Similarly, use of Beacon for storing supporter information, and Microsoft 365 for all other SNAPS documents and records. All Team and Board members to be aware of responsibilities in relation to GDPR.	Chief Executive Data Protection Lead All team members Board of Trustees	Annual, or upon adopting new AI technologies.

			All breaches or potential breaches of GDPR to be reported to Chief Executive immediately so the breach can be appropriately reported. All administrative employees use Microsoft Copilot 365 as the primary AI tool to leverage its confidentiality rules and protective measures, that are in place to ensure SNAPS' data is not used by the software outside of the organisation. Do not input sensitive data into any AI tool other than Microsoft's Copilot 365. Complete the AI Tool Assessment Form before implementing any other AI or automated decision making tools. Ensure all AI systems comply with GDPR and up-to-date Charity Commission guidance.		

			Ensure transparency with service users and stakeholders about how their data may be used in automated processes. Maintain human oversight of any decisions that significantly affect individuals. Provide staff training on ethical and lawful use of AI.		
Failure to comply with relevant employment and contract law as an employer	Low	Medium	Ensure suitable employment contract, or contract for services are in place for all employees and contractors. Ensure there is a clear and robust disciplinary procedure for all team members. Management and Board members to be aware of SNAPS' duties as an employer.	All recruiting Managers Chief Executive Board of Trustees	Annual

Breach of Code of Fundraising	Low	Medium	All team members involved in fundraising for SNAPS to be made aware of their duties to be open and honest about SNAPS' fundraising process and the way in which donations will be used. Breaches of the code to be reported to the Chief Executive or Chair.	Fundraisers Chief Executive Chair Board of Trustees	Annual

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