



**Diabetes Care Trust (ABCD) Ltd - Risk Management Review and Action Plan. Updated November 2023**

LO: Likelihood of Occurrence (1-5)  
 SI: Significance of Impact (1-5)  
 GR: Gross Risk (i.e before controls are put in place. (LO x SI + SI = Gross Risk; 1-30)  
 Net Risk: Residual risk after controls have been taken into account (1-30)

Numbers used to inform discussion only

Risks Identified	LO	SI	GR	Current Controls	Net Risk	Action Plan / Responsibility /Timing
<b>GOVERNANCE</b>						
<ul style="list-style-type: none"> <li>Reputational damage due to a perceived conflict between the interest of a sponsor of the trust and a trustee. Apr '16</li> </ul>	2	3	9	<ul style="list-style-type: none"> <li>Declaration of Conflicts of interest before trust meetings. Withdrawal from decision-making if COI exists.</li> <li>Appropriate contracts with suppliers in place.</li> <li>Conflicts of interest policy in place</li> </ul>	5	
<ul style="list-style-type: none"> <li>Lack of strategic direction or succession plan. Apr '16</li> </ul>	2	2	6	<ul style="list-style-type: none"> <li>Charity lawyer is a trustee; auditors manage accounts and reports.</li> <li>Trustees have appropriate experience and professional advice is obtained when required.</li> <li>Operational policy to have appropriate terms for trustees. Succession under review by Board.</li> </ul>	4	
<ul style="list-style-type: none"> <li>Funds assigned for restrictive use not used appropriately. Feb '17</li> </ul>	2	2	6	<ul style="list-style-type: none"> <li>Trustees are aware of risk.</li> <li>Whenever possible funds should be unrestricted.</li> <li>Financial reports to show when funds are restricted.</li> </ul>	4	<ul style="list-style-type: none"> <li>Pharm companies to give unrestricted grants when possible; 3/12.</li> <li></li> </ul>



				<ul style="list-style-type: none"> <li>Statement of pharmaceutical industry funding and made available on the website – see <a href="https://abcd.care/abcd-statementpharmaceuticalindustry-funding">https://abcd.care/abcd-statementpharmaceuticalindustry-funding</a></li> <li></li> </ul>		
<ul style="list-style-type: none"> <li>Formal reports and returns not approved by board before submission. Apr '16</li> </ul>	2	1	3	<ul style="list-style-type: none"> <li>Trust secretariat ensures that reports are circulated before and approved at the appropriate meeting.</li> </ul>	2	
<b>OPERATIONAL</b>						
<ul style="list-style-type: none"> <li>Reputational damage to DCT or ABCD from errors in publication &amp; adverse publicity.</li> <li>Reputational damage due to adverse social media content.</li> </ul>	2	3	9	<ul style="list-style-type: none"> <li>Social media monitored. Controls in place over those authorised to speak for ABCD/DCT.</li> <li>Controls over BJD editorial process.</li> <li>Complaints policy in place.</li> <li>Social media monitored as routine</li> <li>Identified communication lead in place to coordinate response.</li> <li></li> </ul>	7	<ul style="list-style-type: none"> <li>Measures are included in Operational Policy.</li> <li>In operation &amp; reviewed.</li> <li>Controls in place to review &amp; update resources on the ABCD website. Archive policy implemented.</li> </ul>
<ul style="list-style-type: none"> <li>Damage to reputation from complaints by organisations or companies dealing with ABCD. Apr '16</li> </ul>	1	2	4	<ul style="list-style-type: none"> <li>Complaints policy in place.</li> <li>Conflicts of interest reviewed.</li> <li></li> </ul>	3	<ul style="list-style-type: none"> <li>In operation</li> <li>In operation</li> </ul>
<ul style="list-style-type: none"> <li>Effectiveness of DCT impaired because of lack of</li> </ul>	1	2	5	<ul style="list-style-type: none"> <li>DCT &amp; ABCD should have coordinated agendas.</li> </ul>	3	<ul style="list-style-type: none"> <li>In operation &amp; reviewed.</li> <li>ABCD Business to be published in BJD</li> </ul>



knowledge of ABCD's activities. Feb '17				<ul style="list-style-type: none"> <li>• ABCD officers are trustees during their term of office.</li> <li>• DCT &amp; ABCD share a treasurer.</li> <li>• Chair of ABCD reports at each DCT meeting.</li> <li>• Trustees are invited to ABCD meetings</li> <li>• ABCD &amp; DCT websites are linked.</li> <li>•</li> </ul>		news pages to help disseminate information about the Association
<ul style="list-style-type: none"> <li>• DCT fails to fulfil responsibilities because it is too closely aligned with ABCD. Apr '16</li> </ul>	2	1	4	<ul style="list-style-type: none"> <li>• Chair and majority of trustees of DCT should not be ABCD officers.</li> <li>• Trustees to make clear DCT is not obliged to support ABCD objectives.</li> <li>• Chairman is not ABCD officer.</li> <li>•</li> </ul>	2	<ul style="list-style-type: none"> <li>• In operation &amp; reviewed</li> </ul>
<ul style="list-style-type: none"> <li>• The trust does not undertake sufficient appropriate activity to meet its objectives. Feb 17</li> </ul>	2	3	9	<ul style="list-style-type: none"> <li>• Include items relating to public interest in trust agenda</li> </ul>	7	<ul style="list-style-type: none"> <li>• Articles about DCT grants published in BJD &amp; Practical Diabetes, 2020</li> </ul>
<ul style="list-style-type: none"> <li>• Failure to maintain activities if a key executive is incapacitated.</li> </ul>	3	3	12	<ul style="list-style-type: none"> <li>• Chairman, with board, to find a replacement.</li> </ul>	8	<ul style="list-style-type: none"> <li>• Key officers to identify deputies.</li> <li>• To appoint a Vice-Chairman for DCT.</li> </ul>
<b>FINANCE</b>						
<ul style="list-style-type: none"> <li>• Insufficient income to fulfil responsibilities. Feb '17</li> </ul>	2	3	9	<ul style="list-style-type: none"> <li>• Review financial reserves regularly.</li> <li>• Have flexible commitments to grant money which are regularly reviewed by trustees.</li> <li>• Secure diversified sponsorship and</li> </ul>	7	<ul style="list-style-type: none"> <li>• In Operational Policy.</li> <li>• Review reserves policy annually to ensure that ongoing activities can be completed.</li> </ul>



				partnership agreements (such as Health Foundation).		
<ul style="list-style-type: none"> <li>Poor financial controls resulting in fraud, theft, or insufficient cash balances</li> </ul>	1	2	5	<ul style="list-style-type: none"> <li>Financial controls policy in place.</li> <li>Controls over approval of expenditure.</li> <li>Board scrutiny of expenditure.</li> <li>Accounts professionally scrutinised.</li> </ul>	4	<ul style="list-style-type: none"> <li>Engagement with sponsors to adapt to their needs.</li> </ul>
<ul style="list-style-type: none"> <li>Reserve funds held by DCT are not managed appropriately. Feb '17</li> </ul>	2	2	6	<ul style="list-style-type: none"> <li>Appropriately regulated professional financial advisor employed to manage funds. Review reserves regularly at board meetings. Ensure funds in bank accounts do not exceed government guarantee.</li> </ul>	4	<ul style="list-style-type: none"> <li>In operation &amp; reviewed.</li> <li>New bank account to be opened to facilitate prevention of exceeding government guarantee.</li> <li>Appropriate risk level chosen for financial reserves.</li> </ul>
<ul style="list-style-type: none"> <li>Delays and poor service from Accountant could lead to delay in charity financial reporting and cause reputational risk to DCT</li> </ul>	2	3	9	<ul style="list-style-type: none"> <li>Treasurer has raised concerns with the accountant</li> </ul>		<ul style="list-style-type: none"> <li>Performance of accountancy to be monitored during 2024.</li> </ul>
<b>EXTERNAL</b>						
<b>LAW AND REGULATION</b>						
<ul style="list-style-type: none"> <li>Failure to comply with relevant legislation:</li> <li>Charities Act.</li> <li>Companies Act.</li> <li>Data Protection Act/GDPR.</li> <li>Human Rights Act.</li> <li>Trustee Act.</li> </ul>	2	2	6	<ul style="list-style-type: none"> <li>Legal advisor on board of trustees.</li> <li>Monitor Charity Commission newsletters</li> <li>Advice from auditors (annual)</li> <li>Clear responsibility for submitting accounts to Companies House and reports to Charity Commission in a</li> </ul>	3	<ul style="list-style-type: none"> <li>On-going.</li> <li>Registered with Information Commissioner 2018</li> <li>Completed review of data held and implemented new privacy policy in line with GDPR</li> <li>BYOD policy implemented</li> </ul>



<ul style="list-style-type: none"> <li>• Employment law.</li> <li>• Health and Safety law.</li> <li>• Taxation.</li> <li>• Apr '16</li> </ul>			<p>timely manner</p> <ul style="list-style-type: none"> <li>• All submitted reports to be agreed by trustees.</li> <li>• Regular education of the Trustees from legal advisor.</li> <li>• Record of all dates of submissions of governance data to be maintained alongside details of who within the organisation is responsible for submitting data. A record of relevant access codes, URLs and passwords to be maintained so that work can progress in the event that a key member of the team is not available</li> </ul>	
<p><b>OTHER EXTERNAL</b></p>				
<p>External factors affecting operations</p> <ul style="list-style-type: none"> <li>• Impact of Brexit</li> <li>• Impact of COVID-19</li> </ul>			<ul style="list-style-type: none"> <li>• Liaising with sponsors regularly and adjusting programmes to meet their needs and those charitable needs of organisation</li> <li>• Liaising with ABCD and BJD to ensure subsidiaries adhering to national guidance and regulations</li> <li>• Ensuring operational activities of organisation are in line with national guidelines</li> </ul>	
<p>disruptive events such as power cuts or natural disasters e.g. flooding</p>			<ul style="list-style-type: none"> <li>•</li> </ul>	