

## **Strategic Plan 2020-23**

**Board agreed 28 Sept 2020**

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**Vision:**

*'A dynamic and well governed charities sector in which the public has confidence, underpinned by the Charity Commission for Northern Ireland's effective delivery of its regulatory role.'*

**Purpose:**

*'to register, regulate and report on the charity sector in Northern Ireland.'*

**Values:**

*'Independent, Accountable, Proportionate, Impartial, Transparent, Consistent, Respectful.'*

## **Contents**

	Page
Foreword	3
Executive summary	5
1 Introduction – About us	7
2 Commission Vision, Purpose and Values	7
3 Context in which the Commission operates Strategic issues and factors Risk Framework Review of performance	8
4 Strategic Themes and Key Performance Measures	11
5 Delivery and Measures of Success	13
6 Resources	18
Budgeting & Assumptions	19
Staff	
7 Equality Impact	21

## Foreword

This latest strategic plan covers the three years from 2020 to 2023. It signals a revision of the 'new' strategic agenda set out for 2019-22 which reflected the comments and views of the charity sector, stakeholders and the public gathered as part of planning work in 2018-19. In light of these views, we planned to respond to address new risk issues such as safeguarding within registered Northern Ireland charities<sup>1</sup>. This was a new area of work which required additional resourcing. Like regulators in other parts of the UK and Ireland we were allocated additional resourcing to address these issues. Since then, however, this has all changed as a result of the Court of Appeal judgment (February 2020) and the Covid-19 pandemic.

The forthcoming three years will not be what the sector or the Commission envisaged. It may involve legislative change, new decision-making procedures within the Commission and additional support for charities. These will arise because of the judgment and the impact of the Covid-19 situation on both charities and the Commission. This makes planning in the current environment an extremely challenging exercise as there are so many fundamental unknowns. The Commission will continue to operate a more risk-based approach to regulation as a result of a transformation project which began in 2018-19 and will now continue over the next three years. This will take longer to finalise than originally planned due to legislative uncertainty. During this time there are likely to be permanent changes in decision making within the Commission arising from any Ministerial response to the court judgment<sup>2</sup>.

The plan has been developed in the context of an ongoing one-year temporary uplift in resources and uncertainty over future public spending in light of the Covid-19 pandemic. Change in budgets is expected during the plan as the Executive responds to the longer term outworking of the pandemic. This means that any potential legislative changes in the near future will occur while the sector also adapts and new risks to the sector evolve. At this time it is unclear whether additional resources will be required to implement the Minister's preferred response to the Court of Appeal judgment.

The strategic plan sets out how we will continue to balance registration and casework, compliance and investigatory work. This approach has implications for the speed with which we can register charities and process requests for casework, and the priority which we can give to investigations of lower risk issues. We will gradually start to rely on a new risk framework, through which the Commission will identify registration/casework applications, annual monitoring submissions and concerns which carry a low risk of abuse of charities or damaging public trust and confidence in the sector. Resources can then be focused on higher risk issues and cases and, in turn, the Commission will fast track some work while continuing the in-depth scrutiny which other cases require.

As a result of the judgement and Covid-19 time will need to be dedicated to adjust working patterns and processes, and further work will be required to

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<sup>1</sup> Safeguarding work in 2019-20 is reported in ([Annual Report 2019-20 charitycommissionni.org.uk](https://www.charitycommissionni.org.uk))

<sup>2</sup> arising from the proposed Charities Bill and the independent review of charity regulation in NI commissioned by the Minister

develop new systems to deliver decisions effectively and efficiently. As a result the Commission recognises planned growth of the register of charities will be slower and initial good work to develop a culture of compliance and transparency amongst charities will not be progressed as anticipated.

Due to the potential for further litigation relating to the Court of Appeal judgment and future arrangements regarding how the Commission makes decisions, there is a risk that some priorities might not be progressed as planned during the overall period of this plan. While the scale of potential litigation may not be known until well into the three year period covered by this strategic plan, work on cases will continue.

Finally, the Commission would like to acknowledge the assistance of our sponsor department in developing this revised plan. As the department and the Commission respond to the judgment and the pandemic there will be challenges in operating statutory decision making requirements. The Commission remains independent in its decision making, acting without fear or favour, in the public interest.

Nicole Lappin  
Chief Commissioner

Frances McCandless  
Chief Executive

## **Executive summary**

The Charity Commission for Northern Ireland is the independent regulator of Northern Ireland charities, as created by the Charities Act (Northern Ireland) 2008, the "Act". The Commission has five statutory objectives under the Act relating to public trust and confidence in charities, operation of the public benefit requirement, compliance by charity trustees, effective use of charitable resources, and enhancing accountability of charities.

At the start of this strategic plan there are over 6,100 charities in law with their charitable purposes and details on the Commission's website, with a large proportion having uploaded information about their annual accounts and reports for public display. The Commission has identified four strategic themes for the next three years which will deliver its wider statutory remit, the primary objective of which is increasing public trust and confidence in charities.

Our strategic aims and priorities for 2020-23 are:

### Aim 1 – Progressing charity registration and casework to enhance accountability.

Priority – We will increase charity transparency and public trust and confidence through progressing the definitive public list of Northern Ireland charities by:

- Continuing to build the register through operating interim registration procedures until legislative issues are resolved
- Altering policies and procedures in response to potential legislative developments.
- Rebalancing resources between registration and casework.
- publishing information from charities and statutory decisions the Commission has made about them in line with our publication policy.
- Working with the Department for Communities on reviewing charity legislation.

### Strategic Aim 2 – Developing compliance regarding the use of charitable resources

Priority – we will support compliance by charity trustees with their legal obligations and address non compliance by:

- Improving annual return process including automating checking, process review and preparation for operating risk based checking
- Preparing to refocus on non-submission of annual reports and accounts in response to outworking of Court of Appeal judgment (Feb 2020).
- Applying proportionality criteria and risk framework to ensure prioritisation of enquiries resources towards only most serious cases
- Addressing new risk issues emerging from the Covid-19 emergency within charities by undertaking targeted interventions such as thematic reviews.
- Expanding procedures in relation to charity closures to ensure appropriate distribution of charitable assets.
- Altering our compliance systems and procedures to ensure compliance with the Court of Appeal judgment (Feb 2020).

### Strategic Aim 3 – Demonstrating the public benefit arising from charitable giving and activities.

Priority – We will encourage the public to play a key role in holding registered charities accountable by:

- Developing public awareness of what charity regulation means and the operation of public benefit.
- providing a resource where the public can raise concerns about charities' public benefit and/or obtain guidance.
- undertaking a programme of research, including identifying best practice.
- publishing a range of open data and research reports reflecting the size, diversity, operations and funding of the charity sector.

Strategic Aim 4 – Developing as a properly governed, transparent and independent decision making body.

Priority – We will manage our business and deliver services to our customers in an efficient and effective way while promoting a positive internal organisational culture by:

- maintaining a focus on organisational governance, culture and values
- reporting reliable information on performance against targets and standards, and on the use of all available statutory powers.
- developing the capacity to manage change effectively and identify ongoing improvements to systems and processes.
- monitoring and responding to customer needs and satisfaction
- identifying and responding to pandemic challenges and opportunities
- having a commitment to promoting equality of opportunity and good relations.
- Undertaking relocation

Over the next three years, resources permitting, the Commission will focus on:

- 2020/21: working with DfC in reviewing charity legislation and redesigning systems in the interim pending a Ministerial response to the judgement, and responding to the Covid-19 pandemic;
- 2021/22: developing strategies to respond to new needs and risk in the charity sector arising from Covid-19 and permanently reshaping some decision-making processes; and
- 2022/23 refocusing compliance messages once legislative issues are resolved.

The Commission will also undertake an office relocation during the course of this plan.

The Commission's current source of income is 100% 'Grant in Aid' from central government. At the time of drafting the plan the overall 2020-21 allocation was £1,671k with £317k of non-recurrent funding added. This plan does not assume similar funding over the remaining two years to address pressures across the Government resource budget. The Commission has prepared its strategic plan based on major uncertainty around potential legislative change and addressing new emerging risks within the local charity sector.

The three-year strategic plan will be supplemented by annual business plans detailing actions, milestones and measures to achieve the overall strategic themes.

## **Introduction – About Us**

- 1.1 The Charity Commission for Northern Ireland’s purpose is to register, regulate and report on the charity sector in Northern Ireland. At the start of this strategic plan there are over 6,100 charities in law with their charitable purposes and details on the Commission’s website, with a large proportion having uploaded information about their annual accounts and reports for public display.
- 1.2 The Commission is a non-Departmental Public Body (NDPB), established by Royal Assent to deliver the statutory provisions of the Charities Act (Northern Ireland) 2008, the “Act”. We are sponsored by the Department for Communities (DfC), with a board of seven Commissioners appointed by the Minister for Communities.
- 1.3 As an NDPB the Commission is independent in its decision making, acting without fear or favour, in the public interest. Various decisions of the Commission are appealable to the Charity Tribunal or the Courts. The Commission welcomes the opportunity to test and clarify charity law as opportunities arise.
- 1.4 The Commission has five statutory objectives under the Act:
  1. *to increase public trust and confidence in charities.*
  2. *to promote awareness and understanding of the operation of the public benefit requirement.*
  3. *to promote compliance by charity trustees with their legal obligations in exercising control and management of the administration of their charities.*
  4. *to promote the effective use of charitable resources.*
  5. *to enhance the accountability of charities to donors, beneficiaries and the general public.*

## **2. Commission Vision, Purpose and Values**

- 2.1 The Commission’s Vision is:

*‘A dynamic and well governed charities sector in which the public has confidence, underpinned by the Charity Commission for Northern Ireland’s effective delivery of its regulatory role.’*
- 2.2 Our Purpose is:

*‘to register, regulate and report on the charity sector in Northern Ireland.’*
- 2.3 The Commission works with its various stakeholders and provides services which reflect our Corporate Values of being:

*‘Independent, Accountable, Proportionate, Impartial, Transparent, Consistent, Respectful.’*

### 3. Context in which the Commission operates

- 3.1 As part of the strategic planning process the Commission considered the issues and factors it was likely to face including the impact of changes in the regulatory landscape, and the emergence of new risk and needs in the sector arising from the pandemic. A number of strategic issues will impact on Commission practices in the next three to five years.

#### **Strategic Issues and factors**

- 3.2 **Political change** – The return of the political institutions and absence of imminent elections should bring a stable environment in which strategic decisions about the Commission can be made.
- 3.3 **Legislative** – There are legislative mechanisms in place via the Assembly to take forward any new policy agenda for charity regulation. Therefore, the Commission anticipates the Department for Communities undertaking a review to bring Northern Ireland legislation in line with improvements made in England and Wales in the past few years.
- 3.4 **Economic** – the plan will be implemented against the backdrop of major changes and uncertainties in the financial landscape of government in Northern Ireland arising from the medium-term outworking of the Covid-19 pandemic. In 2019-21 the Commission received resource uplifts at the start of the year and in previous years has received in-year bids which had a significant impact on ability to operate. Without these the Commission would have struggled to meet emerging needs. Further strategic bids are likely to be necessary in coming years, unless additional baseline resources are made available.
- 3.5 **Social** – During the pandemic charities, including Trustees and volunteers, have faced change on various levels and an unprecedented scale of demand from beneficiaries and the public at a time when traditional fundraising and volunteer input has been altered. Demands for transparency and changes in how charities operate are unfolding.
- 3.6 **Technological** – remote working and cyber issues dominate development of on line systems. The Commission will develop and implement a new Information Communication and Technology (ICT) Strategy for the period of this plan. Increased reliance on technologies within charities as a consequence of remote service delivery during Covid-19 may introduce new risks.
- 3.7 **Environmental** –The Commission has in place an Environmental Management Strategy providing a means for the Commission to play a part. The pandemic will force a change in working practices and the impacts will be managed through the strategy.



- 3.8 **Capacity** – If legislative amendments are enacted during the life of this plan there is a risk the Commission may be insufficiently resourced to deliver the changes necessary. The joint work required with the Department for Communities in preparing and participating in a review of the Commission and the legislation may impact on other planned priorities.

### **Risk Framework for 2020/23**

- 3.9 During the 2016 -19 strategic plan the Board adjusted risk levels<sup>3</sup> to recognise the Commission’s likely ongoing level of funding and what that means in terms of the level of regulation that can be delivered, as opposed to public expectations. Sponsor department are content with this approach as it is the Board’s responsibility to set objectives that match its resources and manage any risks to those objectives. The current Board has continued with this assumption about the normal environment in which it operates.
- 3.10 The Commission’s corporate governance framework reflects a range of risks that the organisation has to manage. While implementing this strategic plan these will also include:
- There is potential for further litigation and costs arising from the judgment. Complaints arising from issues related to decision making may be referred to other Ombudsman and regulators requiring resources to be allocated to respond.
  - The impact of the court judgment means that charities registered by staff are no longer required to file an annual monitoring return with the Commission<sup>4</sup>. This erodes public transparency and the annual reporting culture established over the last six years (from 95% in Oct 2019 to 40% in August 2020) and may be difficult to re-establish following any amendment of legislation.
  - It is anticipated that there will be an increase in the number of charity closures as a result of the pandemic emergency. This presents new risks in relation to the appropriate disposal of charity assets.
  - Interim arrangements may also mean slower decision making which could lead to complaints about delays that damage the work of charities.
  - Plans to expand and review the Commission’s guidance are put at risk by demands on teams responding to new and emerging work in the current environment.
  - Given the legislative situation it will take longer for the risk assessment framework to function effectively and scope to identifying more serious threats during the life of this plan will be limited.

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<sup>3</sup> Refers to risk appetite, see [dfc-risk-management-framework.pdf \(ni.gov.net\)](#) for guidance

<sup>4</sup> will be subject to change when Charities Bill is passed

- Any review of legislation could introduce new policy agendas which would expand the Commission's workload.
- Increasing reliance on technology to provide access to services and support provision of information on the register could introduce new risks exposing personal information held by the Commission.

### **Review of performance**

3.11 During 2019-20 the Commission achieved 70% of its corporate key performance indicators (KPIs). This included the following achievements:

#### External KPIs

- 111 registration application decisions made (target: 475)
- 82% of registration applications were processed within five months (target: 60%).
- 100% of self-regulatory concerns about charities were processed to closure with six months of receiving a full risk assessment (target: 80%)
- 19% of annual returns submitted to the Commission were subject to basic compliance checks (target: 17%)
- 64% of initial compliance assessments done within 30 days (target: 50%)
- 95 pre-registration closures reviewed and action taken (target: 75)

#### Internal KPIs

- 89% of creditors' invoices paid within 10 working days (target: 90%).
- total budget managed within 97.9% (target: 99%).
- staff absence levels managed within 2.87% (target: 8%)

## **4. Strategic Themes and Key Performance Indicators for 2020-23**

- 4.1 In developing this plan the Commission considered the knowledge built up within the organisation since it became operational in April 2010, reports on the operation of fellow Charity regulators and lessons learnt, and feedback from a range of stakeholders including their views and expectations obtained through consultation.
- 4.2 The Commission will likely be facing budget uncertainty and pressures during the period of this plan.
- 4.3 The Commission plans to achieve the following key performance results over the next three years:

### **2020-21**

- Registration – (one SO<sup>5</sup> and seven EO2s) continue to build the charity register by processing 360 cases (+/- 10%) to closure by year end (based on an assumption of receiving the requisite number of complete applications, the availability of Commissioners to consider the requisite number of recommendations and undertaking some transformation work); process 60% of registration applications to decision within 7 months of receiving a 'complete' application.
- Monitoring & Compliance – (one SO and three EO2s) assess 400 cases of organisations that have closed before being called forward to register; continue to develop the online annual monitoring return form process; improve annual return and closures processes by reviewing and automating checking, where possible.
- Enquiries – (one SO and two EO2s) 100 investigations in total on the highest risk concerns. Projected balance of 170 concerns about charities not dealt with as investigations at the end of this year; process 80% of self regulatory and 60% of regulatory enquiries to closure within 6 months of respective risk assessments

### **2021-22**

- Registration – (one SO and five EO2s) continue to build the charity register by processing 360 cases (+/- 10%) to Commission decision by year end (based on an assumption of receiving the requisite number of complete applications, the availability of Commissioners to consider the requisite number of recommendations and undertaking some transformation work); process 60% of registration applications to decision within 6 months of receiving a 'complete' application.
- Monitoring & Compliance – (one SO and two EO2s) assess a maximum of 100 cases of organisations that have closed; develop and test new mechanisms for marking the register to prepare for implementation, when appropriate; undertake work to address culture of not publishing AMRs on the Commission's website.
- Enquiries – (one SO and two EO2s) High risk concerns would remain the focus of our investigations team with 120 investigations progressed

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<sup>5</sup> SO – Staff Officers EO2 – Executive Officer grade 2

to closure. 60% of enquiry cases concluded within nine months of receipt of concern. Projected balance of 30 (cumulatively 220) concerns about charities not dealt with as investigations at the end of this year.

### **2022-23**

- Registration (five EO2 and one SO) continue to build the charity register by processing 360 cases to closure by year end (based on an assumption of receiving the requisite number of complete applications); process 60% of registration applications to decision within six months of receiving a 'complete' application.
- Monitoring & Compliance (one SO and two EO2s)– assess 200 cases of organisations that have closed; restart basic compliance checking for the charities covered by the accounting and reporting requirements .
- Enquiries – (one SO and two EO2s) High risk concerns would remain the focus of our investigations team with 120 investigations progressed to closure – leaving 60 (cumulatively 280) cases at the end of 2021/22 not dealt with as investigations at the end of this year.

4.4 The following section sets out strategic aims along with criteria against which performance will be measured.

## 5. Delivery and Measures of Success -

- 5.1 This strategic plan will be put into effect through a series of annual business plans. Each business plan will include details of actions needed, key milestones and performance measures to underpin the strategic themes and priorities. The table below will be developed to reflect priority actions for strategic themes which will depend on the strategic themes and key performance indicators. A variety of quantitative and qualitative performance measures will be included in annual business plans. Results will be reported through annual and research reports.

### Strategic aims and measures 2020-23

<b>Strategic Aim 1 – Progressing charity registration and casework to enhance accountability.</b>	<b>What success would look like</b>	<b>How will we measure success</b>
<p>Priority – We will increase charity transparency and public trust and confidence through progressing the definitive public list of Northern Ireland charities by:</p> <p>a) Continuing to build the register through operating interim registration procedures until legislative issues are resolved</p>	<p>We continue to work on calling organisations on the expressions of intent list forward to register <u>based on risk</u> and process all complete applications arising in line with data protection legislation.</p>	<p>Publish performance information in annual report as per the relevant business plan milestones and measures.</p>
<p>b) Altering policies and procedures in response to potential legislative developments.</p>	<p>Robust procedures which reflect the updated policy agenda</p>	<p>Publish performance in annual report information as per the relevant business plan milestones and measures.</p>
<p>c) Rebalancing resources between registration and casework.</p>	<p>The waiting list will be reduced and casework will be progressed.</p>	<p>Publish information in annual report as per the relevant business plan milestones and measures.</p>
<p>d) publishing information from charities</p>	<p>All charities keep their details</p>	<p>Publish performance in annual report</p>

and statutory decisions the Commission has made about them in line with our publication policy.	complete and up to date. Charities and the public make more use of online information. Web pages reflect the history of each charity that has submitted information.	information as per the relevant business plan milestones and measures.
e) Working with the Department for Communities on reviewing charity legislation	Charities are freed up from unnecessary bureaucracy. Focus on large scale transactions high risk.	Regular feedback from the sector. We publish information in our annual report on the changes sought and extent of charitable assets potentially affected if powers in place.

<b>Strategic Aim 2 – Developing compliance regarding the use of charitable resources</b>	<b>What success would look like</b>	<b>How will we measure success</b>
Priority – we will support compliance by charity trustees with their legal obligations and address non compliance by: a) Improving annual return process including automating checking, process review and preparation for operating risk based checking	We get satisfactory audit assurance on our processes. Resources are directed to issues of highest risk	Publish performance information as per the relevant business plan milestones and measures
b) Preparing to refocus on non-submission of annual reports and accounts in response to outworking of Court of Appeal judgment (Feb 2020) and/or any legislative amendment.	Greater transparency to the public on register of charities Achieve historic low non-filing rates once again	Publish performance information as per the relevant business plan milestones and measures
c) Altering our enquiries procedures to ensure continued compliance with the Court of Appeal judgment (Feb 2020)	We will develop enquiries procedures to focus resources on where regulatory action is most appropriate.	Publish performance information as per the relevant business plan milestones and measures.

and any legislative amendment.	We will launch a series of smart forms for notifications to the Commission.	
d) Applying proportionality criteria and risk framework to ensure prioritisation of enquiries resources towards only most serious cases	We will take timely action against charity Trustees and/or Officers and the risk level shared as appropriate.  Action taken when false information is submitted.	Publish performance information as per the relevant business plan milestones and measures.  Publish information on number of prosecution files passed to DPP
e) Addressing new risk issues emerging from the Covid-19 emergency within charities by undertaking targeted interventions such as thematic reviews.	We will identify risks and prevalence and shared knowledge with the sector as appropriate.	Publication of thematic reports including detailing where charities have failed to report issues to the Commission.
f) Expanding procedures in relation to charity closures to ensure appropriate distribution of charitable assets.	A robust procedure which identifies where charitable assets have been disposed of on closure	Assurance that assets have been appropriately applied Where assets have not been appropriately applied, remedial action taken
g) Altering our compliance systems and procedures to ensure compliance with the Court of Appeal judgment (Feb 2020).	Robust procedures which reflect the updated policy agenda.	We publish information in our annual report on the work undertaken.
h) Respond to the Ministerial Review and Independent Review	Input to DfC and independent counsel, when required.	We publish information in our annual report on the work undertaken.
i) Respond to the proposed legislative amendment	Input to DfC, where appropriate, in relation to the impact on annual reporting and prepare board briefings.	We publish information in our annual report on the work undertaken.

<b>Strategic Aim 3 – Demonstrating the public benefit</b>	<b>What success would look like</b>	<b>How will we measure success</b>
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<b>arising from charitable giving and activities.</b>		
Priority – We will encourage the public to play a key role in holding registered charities accountable by:		
a) Developing public awareness of what charity regulation means and the operation of public benefit.	All charities report on public benefit. Public informed about how to understand public benefit reporting.	Publish performance information as per the relevant business plan milestones and measures.
b) providing a resource where the public can raise concerns about charities' public benefit and/or obtain guidance.	Guidance is reflected in more relevant and actionable concerns. Regularly receive concerns from the public about failure to provide public benefit.	Publish performance information as per the relevant business plan milestones and measures.
c) undertaking a programme of research, including identifying best practice.	A range of best practice case studies published annually. Charities produce Annual Public Benefit statements and reporting that demonstrate best practice which the public understand. Research to update understanding of Public Trust and Confidence undertaken	Publication of research reports as per the relevant business plan milestones and measures.  Annual survey feedback.
d) publishing a range of open data and research reports reflecting the size, diversity, operations and funding of the charity sector.	Produce a report detailing the scale and nature of the sector. Increase in demand for Commission information.	Publication of annual charity sector report. Publish performance information as per the relevant business plan milestones and measures.

<b>Strategic Aim 4 – Developing as a properly governed, transparent and independent decision</b>	<b>What success would look like</b>	<b>How will we measure success</b>
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<b>making body.</b>		
Priority – We will manage our business and deliver services to our customers in an efficient and effective way while promoting a positive internal organisational culture by: a) maintaining a focus on organisational governance, culture and values	Avoiding qualified accounts. Operating within the terms of the MSFM. High staff engagement levels. Achieve Investor in People status.	Publish Audit opinions. People Strategy Implementation.  Staff survey.
b) reporting reliable information on performance against targets and standards, and on the use of all available statutory powers.	SMART performance information is routinely provided inside and outside the organisation and effectively scrutinised. Effective regulator in the eyes of the public.	Publish performance information as per the relevant business plan milestones and measures.  Publish Audit opinion on assurance mechanisms.
c) developing the capacity to manage change effectively and identify ongoing improvements to systems and processes.	Culture of the organisation reflects flexibility and focus on ongoing development.	Publish performance information in annual reports.
d) monitoring and responding to customer needs and satisfaction	Customer charter standards are consistently delivered.	Ad hoc customer surveys, monitoring of complaints and customer charter service standards
e) identifying and responding to pandemic challenges and opportunities	Develop new approaches to an effective mix of remote and office working	Publish survey results
f) having a commitment to promoting equality of opportunity and good relations.	Delivering the action plan 5 year scheme review identifies positive outcomes Diverse workforce which feels respected and valued.	Annual Review of scheme implementation  Staff survey.
g) Plan for and undertake relocation	Commission accommodated in secure	Publish performance information in

	fit for purpose premises which meet business needs.	annual reports.
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## 6. Resources

6.1 The Commission's current source of income is 100% 'Grant in Aid' from the Sponsor Department. Sponsor department agreed to the Board developing a 2019-22 strategic plan based on the agreed baseline budget with an additional £300k allocation per annum over 3 years to address emerging risks to the charity sector. While preparing the 2020-23 plan sponsor department's Finance team undertook a snap three year budget planning exercise. At the outset the Commission's resource baseline in 2020-21 was confirmed as £1,671k and that the £300k non-recurring is not part of that baseline. The Commission was asked to project for a budget freeze in subsequent years, see table 1 below. An initial narrative was provided explaining what will have to stop if the assumed budget levels are not provided.

Table 1: 2020-23 Budget

Item	2019/20 Baseline	2020/21 Baseline	2021/22	2022/23
Commissioners' Remuneration	£21,168	£40,908	21,168	21,380
Staffing Costs	£1,249,161	£1,545,864	1,429,546	1,390,817
Staff/Commissioner Non-Remuneration Costs	£59,801	£82,296	76,657	77,423
IT Costs	£99,700	£103,500	106,518	107,583
Premises Costs	£79,975	£80,155	51,522	28,754
General Running Costs	£42,500	£43,500	36,961	37,330
Programme Delivery Costs	£118,955	£137,085	81,362	82,176
<b>TOTAL REVENUE COSTS</b>	<b>£1,671,000</b>	<b>£1,988,000</b>	1,803,734	1,745,464
Inescapable - pensions			-75,000	-76,500
Loss of fixed term posts/strategic business case budget			-66,000	
			<b>1,662,734</b>	<b>1,668,964</b>

<b>Capital Costs</b>	£297,000	£168,000 <sup>6</sup>	245,000	80,000
<b>Total Capital Costs</b>				
<b>Overall Total</b>	<b>£1,928,000</b>	<b>£2,159,000</b>	<b>£1,907,734</b>	<b>£1,768,964</b>

### Budgeting Assumptions

6.2 The detailed budget with assumptions will be set out as follows;

Commissioner costs	It is assumed a full Board will be in place following public appointments by DfC.
Staff Remuneration	It is assumed the NICS pay settlement for 2020/21 will be a 1% increase and continue for a further three years, and that employer payroll costs will be fully met and remain unchanged.
Staff/Commissioners non-remuneration costs	The existing recruitment budget will be maintained in anticipation of less staff turnover arising from the office relocation in light of transformation to remote working norm. The training budget will be flat lined to reflect the need to maintain existing staff knowledge and any recruited as part of normal churn. A reduction in travel and subsistence is anticipated.
IT costs	No notable change is anticipated in ICT Costs.
Facilities/Premises costs	Facilities/Premises costs are as yet unknown but are anticipated to be hard charged on an apportionment basis and covered by sponsor department.
General running costs	General running costs are anticipated to remain unchanged.
Programme Costs (excl legal and professional costs)	Programme delivery costs are anticipated to be reduced to bare minimum.
Legal and professional costs	Legal and professional fees will remain at levels.

### Staff

<sup>6</sup> Assuming a tail of £90k from 2019/20, and in year easement of £45k capital for ICT strategy work and £100k for further transformation arising from Court of Appeal judgment and Minister's policy intent on way forward.

6.3 The Commission's largest area of expenditure is on staffing, with approx £1,240k being spent in 2020/21 on permanent, temporary and agency staff. During this plan it is anticipated there will be no overall change to the staff structure which is made up of Charity Services, Compliance and Enquiries, and Corporate Services. Part of the additional resource allocation made in 2019/20 brought 9 additional EOII posts added to the staff compliment, with five allocated to Monitoring & Compliance and Enquiries (1 permanent, 3 Fixed term, 1 internal secondment), and four to Casework (2 permanent, 1 fixed term and 1 internal secondment) .

## **7. Equality Impact**

- 7.1 Under our approved integrated equality scheme the Commission is committed to delivering scheme commitments. During the lifetime of this plan the scheme will continue to be progressed and kept under review. Annual reports on annual progress will be submitted to the Equality Commission for Northern Ireland and published on our website.

## Appendix 1 – Initial resource budget projections Aug 2020

	2021-22	2022-23	2023-24
<b>Resource Budget Allocation (baseline)</b>	£1,671k	£1,671k	£1,671k
<b><i>Commissioner Remuneration</i></b>			
Commissioners (7)	21,168	21,380	21,593
Schedule 1 Committee costs	0	-	-
<b>Sub Total Commissioners Remuneration</b>	<b>21,168</b>	<b>21,380</b>	<b>21,593</b>
<b><i>Staff Remuneration</i></b>			
Agency Staff	30,000	-	-
Total Permanent Staff Costs	1,399,546	1,390,817	1,418,634
<b>Sub Total Staff Remuneration</b>	<b>1,429,546</b>	<b>1,390,817</b>	<b>1,418,634</b>
<b><i>Staff/Commissioner non remuneration Costs</i></b>			
Recruitment (Advertising Costs)	18,000	18,180	18,362
Travel & Subsistence	12,000	12,120	12,241
Training	23,000	23,230	23,462
Corporate Legal & Professional costs	23,657	23,893	24,132
<b>Sub Total Staff/Comm'r non remuneration</b>	<b>76,657</b>	<b>77,423</b>	<b>78,198</b>
<b><i>IT Costs</i></b>			
Database Running Costs	78,756	79,544	80,339
IT Support (IT Assist)	24,962	25,212	25,464
IT/Information/Accessibility Audit & Assurance	2,800	2,828	2,856
<b>Sub Total IT Costs</b>	<b>106,518</b>	<b>107,583</b>	<b>108,659</b>
<b><i>Facilities/Premises costs</i></b>			
Rent/Service Charge	23,052	-	-
Rates	13,584	13,720	13,857
Security (DfC) £2944pm		-	-
Cleaning/Maintenance	8,357	8,440	8,525
Heat, Light & Electricity	6,529	6,594	6,660
<b>Sub Total Facilities/Premises costs</b>	<b>51,522</b>	<b>28,754</b>	<b>29,042</b>
<b><i>General Running Costs</i></b>			
Call handling	12,000	12,120	12,241
Telecoms (Incl Mobiles & Broadband)	19,461	19,655	19,852
Stationery/IT Consumables	3,000	3,030	3,060
Postage	2,500	2,525	2,550
<b>Sub Total General Running Costs</b>	<b>36,961</b>	<b>37,330</b>	<b>37,703</b>
<b><i>Programme Delivery Costs</i></b>			
Legal & Professional Fees	55,000	55,550	56,106
Conference Fees/Residential	2,500	2,525	2,550
Communications	8,000	8,080	8,161
Events & Hospitality	2,940	2,969	2,999
Investigation interviewee Costs	422	426	430
Minor Equipment	1,000	1,010	1,020
Membership fees	11,500	11,615	11,731
<b>Sub Total Programme Delivery Costs</b>	<b>81,362</b>	<b>82,176</b>	<b>82,997</b>
<b>Total Resource Costs</b>	<b>1,803,734</b>	<b>1,745,464</b>	<b>1,776,827</b>
Inescapable - pensions	-75,000	-76,500	-78,030
Strategic plan budget	-66,000		
	<b>1,662,734</b>	<b>1,668,964</b>	<b>1,698,797</b>