

Business Plan 2017-18

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

Foreword

Executive summary

- 1 Introduction About us
- 2 Commission Vision, Purpose and Values
- 3 Strategic Themes and Risk Framework for 2017/18
- 4 Business Results and Key Performance Indicators for 2017/18
- 5 Actions and Measures
- 6 Resources

Budgeting & Assumptions

Staff

Foreword

At the start of this business plan there are in the region of 5,500 charities on the public register who intend to deliver public benefit in Northern Ireland. The Commission's core purpose is to register, regulate and report on the charity sector in Northern Ireland, and our primary objective is to increase public trust and confidence in charities. This objective is firmly at the heart of the Commission's business planning and ongoing programme of work.

In September 2016 the Minister for Communities launched the Commission's first major piece of research which explored levels of trust and confidence in charities in Northern Ireland. The research identified the key drivers of public trust and confidence which include openness, transparency and effective reporting. Over 90% of respondents felt that proper regulation of charities was important to them, and for a large proportion knowing there was a regulator had a positive impact on trust and confidence in charities.

With just over one quarter of research respondents perceiving that their level of trust and confidence in charities had declined over the past two years there is work to be done by charities, the Commission and the Department for Communities (DfC) to work towards reversing this figure and raising existing levels of trust and confidence. Facilitating transparent and accessible annual reporting by charities to the public, with proportionate compliance monitoring to boost confidence, is a major facet of this plan. If this is not implemented, serious risks to public trust and support of the charity sector will remain and could increase, creating deeper challenges for DfC which relies heavily on the sector to make a difference to our community.

The Commission is independent in its decision making, acting without fear or favour, in the public interest. In terms of our regulatory work, the largest proportion of investigations arise from concerns from within the charity sector, followed by referrals from other statutory bodies, such as law enforcement agencies. Concerns are still on the increase year on year, and the public are a major and growing source. As a proportionate and risk-based regulator, the vast majority of concerns are dealt with by advice and guidance. In a small number our full statutory powers are used to investigate and deal with apparent mismanagement and misconduct. This is intensive work, with various opportunities for challenge. Dealing with these has turned out to be more complex and frequent than the Board envisaged, with the Commission facing proportionately more Tribunal challenges than regulators in England & Wales and Scotland combined in 2016. Amongst these peer charity regulators the Commission has also been the first to use some of the statutory powers, ahead of longer established regulators. Going forward there is a continuing need for DfC, as our sponsor department, to set a clear regulatory policy agenda and support the regulator as its work grows and develops.

The Commission produces thematic reports on the outcomes of its work. In 2016 these covered statutory investigations, registration refusals and annual returns with the aim of sharing our learning with the charity sector and other stakeholders, including the public. Further lessons learnt reports will be produced as part of this plan, in particular focusing on compliance monitoring.

As a regulator the Commission has worked hard to develop its own governance and has received various clean audit reports. The Board provide governance, strategic management and a challenge function to the Executive. The Commission operates within the resources and policy parameters of the Department for Communities, furthering the department's strategic objectives and doing so with its advice and support.

The 2017/18 business plan was developed to support the Commission's Strategic Plan, and sets out our vision and purpose. It also identifies detailed actions, milestones and measures to achieve the overall strategic themes. At this time the Commission's current source of income is 100% 'Grant in Aid' from central government. Against a backdrop of increasing the regulatory, remit the sponsor department has made a budget allocation for 2017/18 which reflects a resource budget cut of 4%. This will see an initial overall allocation of £1.54 million for 2017/18. As in previous years the Commission anticipates making in year bids for resourcing as needs arise. In light of early inescapable pressures the sponsor department has made an additional allocation of £100k.

As part of the 2017/18 planning process the Commission undertook a capacity review with the sponsor department. This business plan is largely based around option D - 5% reduction. However, no final decision on the capacity review will be taken until the Department's own strategic review of the Commission has been finalised. This poses significant risks to the Commission as an effective regulator which have been highlighted to the Department. Nevertheless, depending on service demands and availability of resources, certain areas and levels of activity will be affected, but the Commission intends to remain a proportionate and effective regulator.

Tom McGrath CBE Chief Commissioner Frances McCandless Chief Executive

Executive summary

The Charity Commission for Northern Ireland was established in 2010, and is the independent regulator of Northern Ireland charities. The Commission has been very successful in achieving previous business plan targets. There are in the region of 5,500 charities on the public register at the start of this 2017/18 plan. These have a range of charitable purposes intended to deliver public benefit in Northern Ireland.

The Commission has developed a strategic plan for 2016 to 2019 and identified four strategic themes which will deliver its wider statutory remit, the primary objective of which is increasing public trust and confidence in charities. The strategic themes are:

- 1 developing compliance regarding the use of charitable resources;
- 2 progressing charity registration to enhance accountability;
- 3 demonstrating the public benefit arising from charitable giving and activities; and
- 4 developing as a properly governed, transparent and independent decision making body.

During 2017/18 a range of services will be delivered with related key performance indicators. The Commission will concentrate primarily on implementing a new compliance monitoring regime focusing on basic compliance checking of approximately 1,550 charity annual returns this year, making decisions on around 650 registration applications, progressing a wide range of other regulatory activities, and managing the organisation within 1% budget.

In undertaking this work there is a range of risks facing the organisation, in particular, the volume of annual charity returns around filing dates and the level of checking of returns the Commission will be able to perform. The Commission will face serious difficulties in balancing the need to complete the register with enforcing compliance by charities, as the law requires. With an estimated 5,000 to 11,500 organisations still to be registered, the process of building the register may take some time, depending on resourcing. This is likely to affect confidence in the Commission as a regulator and diminish confidence in the charity sector.

The Commission has experienced increasing resource pressures year on year just to stand still, while regulating a growing number of charities across a broad range of issues. DfC has made a budget allocation for 2017/18 reflecting a resource budget cut of 4%, which this business plan reflects, along with an in year allocation of £100k. Resources have been prioritised for our new monitoring and compliance regime, and moved from other key areas such as registration, casework and investigations. Policy development and the provision of advice have been reduced. Accordingly, key performance targets have been adjusted down from previous years. The Commission also has plans to scope a more sophisticated risk system that will underpin risk-based regulatory activities and allocation of resources.

The Commission will continue to update and expand the range of charity sector information it publishes, with the aim of creating greater transparency and accountability to meet the Commission's primary objective of increasing public trust and confidence in charities.

1.0 Introduction

- 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 plan there are over 5,500 charities on the public register with a range of charitable purposes intended to deliver public benefit in Northern Ireland.
- 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, who were appointed by the departmental Minister.
- 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.

2.0 Strategic 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 Mission 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.'*

3.0 Strategic Themes and Risk Framework for 2017/18

- 3.1 The Commission's 2016-19 strategic plan details the organisation's strategic themes and priorities for the period of this business plan as:
 - 1 developing compliance regarding the use of charitable resources;
 - 2 progressing charity registration to enhance accountability;
 - 3 demonstrating the public benefit arising from charitable giving and activities; and
 - 4 developing as a properly governed, transparent and independent decision making body.
- 3.2 The Commission's corporate risk framework includes a range of issues and challenges which impact on our ability to act as a regulator. While implementing this business plan it is likely that risks related to the following headings will need to be managed in conjunction with DfC:
 - 1 Resourcing the Commission previously welcomed and relied on additional in year resourcing and has now scoped resourcing needs for future years to deliver a range of identified outputs. The Commission wants to avoid further severe pressure on resources which will ultimately impact on its ability to act as an effective regulator and hold charities to account, particularly in monitoring ongoing compliance with the law.
 - 2 Challenges to our work as charity legislation and new processes are implemented, Court and Tribunal judgements are an opportunity to clarify and establish case law. Likewise complaints are an opportunity to identify areas for improvement. However, they are extremely resource intensive and have the potential to impact severely on planned casework and negatively affect the Commission's reputation.
 - 3 Changing the charity sector registration has been a test for the sector and has led to many organisational improvements in governance standards which will build confidence in the sector and underpin accountability. The Commission's aim of building the charity register in a timely manner will become more challenging if remaining organisations do not come forward voluntarily and the Commission has to use legal processes to ensure charity trustees register. In addition, developments in the protection of charities and recent concerns over fundraising methods may create new legislative developments which the Commission will be expected to oversee/implement.
 - 4 Developing a risk-based compliance culture awareness of accounting regulations and annual reporting will build as engagement with the regulatory framework becomes part of the culture of the charity sector and is expected by the public. Using the information provided and implementing a risk based, proportionate compliance monitoring approach is fundamental to detecting poor practice and regulating effectively. The resources required for this are not yet in place.
 - 5 Governance political, media and individual interest in the Commission's work and developments in oversight and governance arrangements by the sponsor department require staff time and resourcing. The Commission aims to meet its legal obligations as a public body and recognises the importance of maintaining robust and supportive relations with its sponsor department.

4.0 Business Results and Key Performance Indicators for 2017/18

4.1 The Commission aims to achieve a range of business results and key performance indicators (KPIs) in 2017/18. The main key performance indicators which will be reported quarterly are:

External KPIs

- continue to build the charity register by processing 650 cases to closure by year end (based on an assumption of receiving the requisite number of complete applications and resources);
- process 60% of registration applications to decision within 4 months of receiving a 'complete' application;
- basic compliance check of 45% of annual return submissions; and
- process 60% of self regulatory and regulatory enquiries to closure within 4 months of full risk assessment.

Internal KPIs

- manage the organisation within 1% budget;
- manage staff sickness absence within 8%; and
- pay 90% of suppliers within 10 days.
- 4.2 This plan also details key priorities that will be progressed to deliver the four strategic themes during 2017/18. The plan omits a range of regular and routine work that is carried out by the Commission, particularly in relation to operating as a public body and its own governance. The actions needed to deliver the strategic themes and priorities, and service related measures are set out below.

5. Actions and Measures

Strategic Aim 1 - Developing compliance regarding the use of charitable resources	Actions	Performance measures and information
Priority - we will support compliance by charity trustees with their legal obligations and address non-compliance by: a) Implementing and reviewing the positive regulatory framework based on accounting and reporting regulations being put into effect by Government from 2016.	 Operate and review the compliance monitoring framework. Mid-year review of proportion of accounts undergoing compliance checks by end Sept 2017. Take steps to ensure all reports received after Oct 2017 reflect the regulations and not interim arrangements. On line Annual return form updated. Implement ICT systems and processes for annual return reporting and analysis of information received. Internal training for staff. Develop and communicate new guidance and on line tools including calculator for submission dates, Online tutorial for AMR. List of charities in default operational on the web site. Public communications programme. 	 We will publish regular performance information on How many charities complied/failed to comply on time. % of Annual Monitoring Returns submitted to the Commission subject to basic compliance checks (target 45% of returns received). % of cases who failed to submit their accounts on time and marked on register as in default % initial compliance assessments within 30 days (target 50% of those received). % of Annual Monitoring Returns defaulters reviewed within 6 months of their third default warning notice and opening of a class inquiry considered (target 95%). We will publish information in the annual report on Number of adverse qualifications. Number of S23 orders issued (for default cases). Number of statutory inquiries opened for default cases.

b) using compliance and enforcement powers to take proportionate and robust action to protect NI's charities from mismanagement and abuse	 Operate compliance procedures. Operate statutory Inquiry processes. Approve orders/directions in accordance with the legal manual. Develop procedure to effect powers re audits and Serious Incident Reports. Develop compliance lessons learned from each time we use a new power. Sharing of experiences and compliance cases with CCEW/OSCR. Develop guidance on matters of material significance. 2 meetings per year with CCEW & OSCR to discuss joint working. Bi annual review of drafting of orders/directions by Legal Advisory Group
 c) verifying that charity trustees have properly discharged their legal obligations in terms of closed charities 	 Operate pre and post registration closure programme. Review guidance on pre and post registration closure. Promptly communicate with Charity trustees and risk assess responses. Communicate with relevant authorities. In house legal training on obligations. 1st thematic report on issues identified from closures.
 acting robustly when charities do not respond to regulatory requirements, or whenever there is doubt about information provided 	 Operate and review procedures for dealing with non compliance. Develop on line services to highlight failure to submit/apply. Start court proceedings/stronger We will publish ad hoc information on: Thematic reports detailing instances of false/inaccurate information. Press releases of irregular activity.

		action on identification of false information.	
f t l	working closely with other government agencies and funders dealing with charities to become the primary hub for dentifying risks, lessons earned and charity regulatory data.	 Build and develop relationships with funders, regulators and other stakeholders. Scope development of CRM to implement linking/flagging of similar concerns or enquires. Scope more sophisticated risk based systems and review our ICT systems. Submit FATF bundle Participate in Organised crime task force. Communication of lessons learned. Assurance to A&RA committee on MOU/SLAs 	 We will publish information in our annual report on evidence and input provided to FATF forum We will publish ad hoc information on: Thematic report on the evidence bundle to FATF.

Strategic Aim 2 - Progressing charity registration and casework to enhance accountability.	Actions needed	Performance measures and information
 We will increase charity transparency by progressing the definitive public list of Northern Ireland charities by: a) operating an efficient and accessible registration process that reflects the definition and norms of charity under the law 	 Amend systems to reflect OLAR questions asked at registration with CRM decision making. Roll out religious designation provisions and implement outstanding linking of associated charities. Clarify further the relevant form of school on the register. Transfer all on line forms to new software format. Develop new guidance. Identify potential grouped registrations. Staff learning and development in processes and caselaw. 	 We publish performance information on Number of Registration decisions made by the Commission (target n=650). % Registration applications processed within 4 months of receiving a 'complete' application. Number of new applications for charitable status received. Number of EOI of intent awaiting call forward.
 b) providing accurate and timely information about charities freely available and accessible globally through the internet 	 Create feedback functionality on the website accessibility. Develop AMR reminder system to engage Charity trustees in updating OLS details. Display date stamp on charity webpage. Create functionality to link charities. Explore data sharing and consent requirements (EU directive). Mark 500,000 hits on our website since it was launched. 	 We publish information in the annual report on feedback from users of the register. downloads of the register. on-line search activities. complaints about data. We will publish ad hoc information on: research strategy information and reports.
 c) publishing information from charities and statutory decisions the Commission has made about them 	 Continue to expand charity footprint on web pages (register). Develop standard re time-lines for updating details and compliance 	We publish information in our annual report on • Frequency of updating of the register

	 check. Develop register to detail orders against registered charities. Legal review of reports to ensure they are based in fact and statutory objectives are being met. 	by charities.
 d) identifying and taking action against those who have failed to register 	 Complete failure to apply step out pilot. 	 We publish information in our annual report on the number of organisations that have failed to apply.
 e) giving information about purposes or financial or regulatory concerns that enlightens the public and donors when making decisions about whether or not to support specific charities 	 Communicate key messages to stakeholders. Joint press statement with other regulators on concerns Display governing documents on register. 	 We publish ad hoc information regarding feedback in surveys on the register and attitudes to charitable giving.
 f) Operating efficient casework processes to enable charities to make the necessary changes to their governance to be effective 	 Undertake customer survey Review guidance and manuals Thematic reports on casework. 	 We publish regular performance information on Number of casework applications received by the Commission. Number of casework decisions made by the Commission. We will publish information in our annual report on Completion of decision reviews

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Strategic Aim 3 - Demonstrating the public benefit arising from charitable resources and activities.	Actions needed	Performance measures and information
 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 	 Comms plan to include use of social media, e-zines, blogs and set out key messages and topics e.g. use of poverty exemption, closed group Develop presence on Facebook and blogs. Update guidance on public benefit reporting. Development of 'bitesize' guidance. Develop and implement political communications strategy. Develop web site to show how to understand and interpret information held on the public register. 	 We will publish regular performance information on Number of Telephone / email general enquiries processed by the Commission. We will publish information in our annual report on concerns from the public. issuing of regulatory guidance on improved public benefit reporting.
 b) providing a resource where the public can raise concerns about charities and/or obtain guidance. 	 Develop inquiry processes and risk profile on CRM to include public benefit failings. Train all staff on how to advise the public about making a concern and common problems we want to hear about. Produce thematic reports on public benefit concerns. Thematic report on risk patterns and trends. 	 We will publish regular performance information on Number of concerns received / enquiries opened/closed. % of concerns received about charities have an initial enquiry risk assessed within 30 days Number of pieces of guidance published. We will publish information in our annual report on website hits on guidance page. levels of satisfaction with specific

		pieces of published guidance.
c) undertaking a programme of research, including identifying best practice	 Implement relevant parts of the research strategy Identify partner research bodies/universities to progress research priority areas/issues. Develop research strategy to reflect internal use of research to set benchmarks. Public launch of research report with partner body Produce mini reports on research. 	 public benefit concerns. We will publish information in our annual report on research reports. web site hits on reports.
 d) publishing a range of open data and research reports reflecting the size, diversity, operations and funding of the charity sector 	Make data open and accessible.	 We will publish information in our annual report on Develop web site open data Number of Thematic reports published. Number of Statutory inquiry reports. Number of downloads of data.
e) working with umbrella bodies dealing with charities to develop strategies to widen the opportunities for others to hold registered charities accountable, while retaining our independence.	 Identifying helper groups to progress broader range of issues Helper group strategy developed Develop programme of helper groups workshops/training Implement process of quality testing/monitoring helper groups Identify/work with governing bodies regarding potential grouped registrations 	 We will publish regular performance information on helper group events per year. We will publish ad hoc information on Results of the annual stakeholder survey.

Strategic Aim 4 - Developing as a properly governed, transparent and independent decision making body.	Actions Needed	Performance measures and information
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	 Support Internal & External Audit fieldwork. Schedule Team Development Days. Implement Staff Development Group. Audit reviews. Measure Customer charter standards. Update staff code of conduct. Update internal publications style guide Develop assurance process (to confirm progress on remedial actions). Prepare for the implementation of the new General Data Protection Regulations 	 We will publish information in our annual report on Audit opinions. Reports on internal compliance. Results of staff survey. People Strategy Action Plan Implementation.
 b) reporting reliable information on performance against targets and standards, and on the use of all available statutory powers 	 Quarterly updates on progress. Regular month end performance reporting. Lessons learned from Tribunal decisions. Implement Assurance checks framework. Analysing and learning from 	 We will publish regular performance information against a range of corporate performance and service information against targets including. 1. Number of website hits. 2. Number of engagement meetings. 3. % Staff absence levels. 4. % budget spend revenue (projected).

	decisions of other regulators and courts.	 5. % budget spend capital (projected). % Creditors' invoices paid within 10 working days (year to date).
 c) ensuring appropriate statutory powers are in place and monitored 	 Revision of/completion of Policy Development Plan. Ongoing work with DfC policy team. Consider implications of cross border charity regulation. 	 We will publish information in our annual report on Progress of policy development agenda Use of available statutory powers Number of tribunal and court challenges
 d) developing the capacity to manage change effectively and identify ongoing improvements to systems and processes 	 Undertake a programme of change management training. Develop programme team governance. Implement guidance on programme team working. Implement actions & recommendations from the sponsor department's strategic and capacity reviews. Develop decision review tool to ensure statutory powers being used effectively. Undertake PPE's of ICT systems. Respond to changes from sponsor department to meet governance requirements. Exploit further opportunities to use shared services and procurement frameworks. 	 We will publish information in our annual report on Project/programme team work. Feedback from pilot schemes and critical friends on systems.
e) monitoring and responding to customer needs and satisfaction	Undertake customer surveys.	 We will publish regular performance information on Number of complaints received about the Commission. Number of information requests (FoI, DPA, EiR) received and responded to. We will publish information in our annual

		report onFeedback from customer surveys.
 f) having a commitment to promoting equality of opportunity and good relations. 	 Draft and consult on integrated scheme and action plan. Approval of a revised integrated Equality Scheme and plan by ECNI. Undertake screening as part of policy development. Gather equality assurance information. 	 We will publish an Annual Report on scheme implementation and achievement of the action plan. We will publish ad hoc information on equality issues identified through project and program teams. No of scheme complaints. .

6. Resources

6.1 The Commission's current source of income is 100% 'Grant in Aid' from the Sponsor Department.

Item	2016/17 Baseline	2017/18 4% reduction & 100k in year
Commissioners Remuneration	£20,700	19,262
Staffing Costs	£1,191,522	1,175,160
Staff/Commissioner Non-Remuneration Costs	£52,400	168,185
IT Costs	£94,500	94,500
Premises Costs	£92,875	83,975
General Running Costs	£31,600	27,800
Programme Delivery Costs	£107,734	67,118
TOTAL REVENUE COSTS	£1,591,331	1,636,000
Capital Costs		
Total Capital Costs	£100,000	
Overall Total	£1,691,331	1,636,000

Budgeting Assumptions

6.2 Baseline resource budget is 4% reduction from 2016/17 plus £100k in year. A capital budget will be allocated to the overall ICT strategy which will be to 'piggy back' CCEW ICT developments where most advantageous. CCNI will seek to be included in CCEW's programme at proportionate cost. This has been estimated at £80k, with approximately £93k spent in 2016/17 and £60k planned in 2018/19.

Commissioner costs	There will be no provision for annual increase in Commissioners or related costs. Assumed full compliment in place from Qtr 2.
Staff Remuneration	25 staff (Light Touch Review full compliment). Seconded staff (casework) to Q3 2017. No additional staff for Compliance Monitoring work but redeployment to undertake compliance work of 1 FTE Casework Officer and 1 FTE Enquiries Support Officer, and 0.4 FTE Policy resources redeployed.
Staff/Commissioners non-	Continued use of HR connect. Training costs reduced to £13k compared to £20k in 2016/17,
remuneration costs	priority will be investment for staff to provide compliance monitoring capacity to deal with peaks around bottlenecks. £124k has been allocated to transformation programme for essential work to underpin prioritisation of reducing resources.
IT costs	ICT budget remains unchanged, reflecting CCEW and IT Assist hosting charges.
Facilities/Premises costs	Rent and service charge increased on previous lease and minor uplift in rates anticipated. Sponsor department's lease for Loughview expires Sept 2021.
General running costs	Costs reduced to £28k compared to £32k in 2016/17, reflecting continued emphasis on electronic communications and IT Assist costs not increasing
Programme Costs (excl legal	Legal spend reduced to £43k compared to £80.5k in 2016/17 and communication costs
and professional costs)	reduced to £8.9k compared to £11.4k in 2016/17. Minor reduction to investigation and
	interviewee costs.
Legal and professional costs	In year 1 assume spend for legal cases begun in previous year or legal opinion for ongoing advice (retained Counsel), Investigation Tribunal cases, Casework Tribunal cases, High Court appeal following on from Tribunal actions, , and first use of powers in Act.

Staff

6.3 The Commission's largest area of expenditure is on staffing, with £1,292k spent in 2016/17 on permanent, seconded and temporary staff. No change is anticipated in the overall staff structure which is made up of Charity Services, Compliance and Enquiries, and Corporate Services.