

Business Plan 2018-19

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.'

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Foreword

In previous business plans the Commission underlined the importance of building the charity register as a key means to deliver the regulatory intentions when the Charities Act (Northern Ireland) 2008 was passed by the Assembly. It is an enormous achievement to have over 6,000 charities on the public register at the start of this plan. The development and maintenance of the register delivers our primary objective, which is to increase public trust and confidence in charities.

At the Commission's public meeting in September 2017, Joe Saxton from nfpSynergy highlighted research indicating a slight decline in the frequency of donations to charities in Northern Ireland over the previous five years. The research also identified underlying public perceptions that too little money actually went to the cause, charities were not being clear on how donations were spent, and the amount spent on staff salaries. As more and more information from charities covering these issues is published in the charity register, donors can make better informed choices. It is anticipated by the end of this plan over 5,000 charities' annual reports and accounts will be on display and accessible through the Commission's website.

In the coming year the Commission's focus will be compliance monitoring of accounts and annual returns to further boost public confidence and develop a culture of compliance within the sector with statutory reporting regulations. The Commission will be sampling a range of charities, with a focus on those with larger incomes. Further details can be found on page 9 of this plan.

The Commission will continue to operate with the resources made available by its sponsor department, the Department for Communities (DfC). In the Board's view the resourcing level is minimal, and it is increasingly difficult to maintain minimum acceptable activity levels as required by the legislation. The sponsor department's baseline resource allocation reflects a 4% reduction on the previous year, although additional in-year funding has been made available. Therefore in 2018-19 the Commission will concentrate on compliance, registration, complex casework, enquiries, and defending legal challenges taken against the Commission and Charity Tribunal decisions. During the year the Commission will be preparing and consulting on a strategic plan 2019-22. This will include radical changes in what will be delivered in light of resourcing pressures experienced by sponsor department.

The Commission has seen litigation taken against it and the Tribunal increase year on year and its extent is out of proportion compared to other charity regulators. In part, this is a reflection of the new legislation, interpretation of which is not settled. Litigation taken against the Commission continues to have an impact on the Commission's ability to progress core work. Ongoing legal challenges introduce significant uncertainties. The Commission will reprioritise planned activities, if resourcing requires it, during the year.

The lack of a Minister for Communities means that the sponsor department's strategic review of the Commission remains incomplete. Nevertheless, during the course of this plan the Commission will be developing a new three year strategic plan and new three year research strategy to inform our future direction. Work will also be progressed to develop our approach as a

proportionate and risk-based regulator, with more focus on targeting our regulatory action at the highest risk cases, resulting in increased self-regulatory action, advice and guidance, where appropriate.

During the early part of this plan the Commission anticipates a recruitment and induction process for new Commissioners will be undertaken by DfC. This is important to ensure legal requirements governing the operation of the Commission are maintained.

Readers should note that where this plan refers to information being produced in an annual report, this will be published in mid 2019.

Tom McGrath CBE
Chief Commissioner

Frances McCandless
Chief Executive

Executive summary

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 6,000 charities on the public register with a range of charitable purposes intended to deliver public benefit in Northern Ireland.

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
- 4 developing as a properly governed, transparent and independent decision making body.

The Commission's corporate risk framework includes a range of issues which could impact on our ability to act as a regulator. While implementing this business plan it is likely that risks related to resourcing, developing a compliance culture, cases brought against us, changes in the charity sector, and governance will need to be managed in conjunction with DfC.

The Commission aims to achieve a range of external and internal business results and key performance indicators (KPIs) in 2018-19. These include building the charity register by processing 160 (+/-10%) cases to closure by year end and basic compliance check of approximately 12% of annual return submissions.

This plan also details key priorities that will be progressed to deliver the four strategic themes during 2018-19, such as registration and enquiries. 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 in Section 5. These include the following.

- Develop an online tutorial for the annual monitoring return.
- Review and update the online annual monitoring return form 2019.
- Undertake a Privacy Impact Assessment of the charity register.
- Develop and implement process to ensure accuracy of the register.
- Thematic reports on casework.

The Commission's current source of income is 100% 'Grant in Aid' from the sponsor department. The Commission's 2018-19 baseline resource budget has been notified by sponsor department as £1,571k reflecting the overall parameters set as part of the 2018-19 budget settlement and departmental allocations. This represents a 4% reduction in the 2017-18 baseline resource budget of £1,636k. Additional non-recurrent funding of £250k has been secured in-year, bringing the total resource budget for 2018-19 to £1,821k. This represents a 7% increase in the total resource budget allocated in 2017-18 of £1,699k.

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 6,000 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 up to seven Commissioners, who are normally 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 2018/19

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:

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

3.2 The Commission's corporate risk framework includes a range of issues which could 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 – low risk cases may be deprioritised or decisions taken not to use discretionary powers as the Commission seeks to best use available resourcing by implementing a broader and more systematic risk-based approach to regulation. This could result in public and sectoral expectations of a regulatory response going unmet.
- 2 Developing a compliance culture – meeting accounting and annual reporting regulations may take more time if a risk-based, proportionate compliance monitoring approach using charity information is not established, potentially leaving repeated defaulting organisations unchallenged and poor practice undetected.
- 3 Cases brought against us – although Court and Tribunal judgements are an opportunity to clarify and establish case law as charity legislation and processes are implemented, the extent of litigation taken against the Commission continues to have an impact on our ability to progress core work and on our resource needs. Likewise, the opportunity to identify areas for improvement through complaints could be lost if high numbers of unreasonable complaints impact on planned work.
- 4 Changes in the charity sector – opportunities to further improve governance standards in charity organisations could be slowed without developments in government policy and legislation on the protection of charities, thus undermining public confidence in the sector and the protection of charity assets from mismanagement or misconduct.
- 5 Governance – potential changes in devolution arrangements, focus on Brexit within public administration, and developments in oversight and governance arrangements by the sponsor department may require staff time/resourcing, affecting the Commission's ability to meet its legal obligations as a public body.

4.0 Business results and key performance indicators for 2018-19

4.1 The Commission aims to achieve a range of business results and key performance indicators (KPIs) in 2018-19. The main key performance indicators which will be reported quarterly are as follows.

External KPIs

- Continue to build the charity register by processing 160 (+/-10%) 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 5 months of receiving a 'complete' application.
- Basic compliance check of approximately 12% of annual return submissions¹.
- Process 80% of self-regulatory and regulatory enquiries to closure within 6 months of respective risk assessments.

Internal KPIs

- Manage the organisation within 1% budget.
- Manage staff sickness absence within 8%.
- Pay 90% of suppliers within 10 days.

4.2 The lowering of registration targets to 160 is to reflect loss of experienced staff and training time for new staff, increases in the range of casework, and building in time for transformation and streamlining of registration and casework processes. Secondments to boost registration capacity ended in Q3 last year. There has been a significant increase in the volume and variety of casework applications. Recent applications involve powers where the Commission has no agreed process in place or where the level of complexity adds greatly to the processing time and the advice that is required to ensure robust decision making. At the start of 2018-19 there were approximately 140 open registration applications and 70 open casework applications.

4.3 This plan also details key priorities that will be progressed to deliver the four strategic themes during 2018-19. 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.

¹ Breakdown of 12% to be confirmed. 2017/18 breakdown reflected 100% of returns made under SORP and 1 in 4 of smaller charities returns.

5. Actions and Measures

Strategic aim 1 - Developing compliance regarding the use of charitable resources	Actions	Performance measures and information
<p>Priority - we will support compliance by charity trustees with their legal obligations and address non-compliance by:</p> <p>a) implementing and reviewing the positive regulatory framework based on accounting and reporting regulations being put into effect by Government from 2016.</p>	<ul style="list-style-type: none"> • Operate and review the compliance monitoring framework. • Mid-year review of proportion of accounts undergoing compliance checks by end Sept 2018. • Communicate key message that all reporting is now under the regulations and not interim arrangements • Amend relevant guidance that reporting must follow the regulations. • Develop the Commission's non statutory 'Annual return regulations 2018'. • Develop an online tutorial for AMR • Review and update the online annual monitoring return form 2019. • Develop means to classify AMR submissions (partial submissions). • Implement ICT systems and processes for annual return reporting and analysis of information received. • Review and update suite of 	<p>We will publish regular performance information on</p> <ol style="list-style-type: none"> 1) 100% check of annual monitoring return PDFs before publication. 2) % of annual monitoring returns submitted to the Commission subject to basic compliance checks (target 12% of returns received). 3) % of cases who failed to submit their accounts on time and marked on register as in default 4) % of charities who have not submitted their accounts and are in default reviewed within 6 months of their third default warning notice and opening of a class inquiry considered (target 95%). <p>We will publish ad hoc information via thematic reports detailing:</p> <ul style="list-style-type: none"> • monitoring review of charities' reporting under the new Accounting and reporting regulations 2016 • quality of small charity accounts received by the Commission <p>We will publish information in the annual</p>

	<p>accounting and reporting guidance.</p> <ul style="list-style-type: none"> • Review and develop manuals and procedures for monitoring function. • Public communications programme. • Take forward recommendations to further develop a risk based approach to regulation. • Consider implementation of automated checking of annual returns. 	<p>report on the:</p> <ul style="list-style-type: none"> • number of adverse qualifications • number of concerns about charity accounts • number of section 23 orders issued (for default cases) • number of statutory inquiries opened for default cases.
<p>b) using compliance and enforcement powers to take proportionate and robust action to protect Northern Ireland's charities from mismanagement and abuse</p>	<ul style="list-style-type: none"> • Operate compliance and enquiries procedures. • Operate statutory inquiry processes. • Develop lessons learned each time we use a new power. • Sharing of experiences and compliance cases with CCEW/OSCR/CRA. • Meet with CCEW, CRA and OSCR to discuss joint working, as required. • Respond to FATF report and put in place a process to follow up on any recommendations. • Operationalise changes to reflect outcomes of Transformation project. 	<p>We will publish regular performance information on</p> <ol style="list-style-type: none"> 5) % initial compliance assessments completed within 30 days (target 50% of those received). 6) % of self-regulatory enquiries processed to closure within 6 months of initial risk assessment (target 80%). 7) % of regulatory enquiries processed to closure within 6 months of full risk assessment (target 80%). 8) % of enquiry cases older than 12 months processed to closure. 9) % decision on complete waiver applications within 30 working days (target 100%). <p>We will publish information in the annual report on the:</p> <ul style="list-style-type: none"> • number of instances of regulatory advice being offered. • orders & directions, opening of statutory inquiry, thematic reports resulting from actions taken in enquiries and compliance.

<p>c) verifying that charity trustees have properly discharged their legal obligations in terms of closed charities</p>	<ul style="list-style-type: none"> • Operate pre and post registration closure programme. • Commence review of pre and post registration closure. • Promptly communicate with charity trustees and risk assess responses. • Communicate with relevant authorities. • Inhouse legal training on obligations. • 1st thematic report on issues identified from closures. 	<p>We will publish regular performance information on the:</p> <ul style="list-style-type: none"> • number of cases where action is taken to address pre-registration closure cases (target 20). <p>We will publish information in the annual report on the:</p> <ul style="list-style-type: none"> • number and type of closures
<p>d) acting robustly, where possible, when charities do not respond to regulatory requirements, or whenever there is doubt about information provided</p>	<ul style="list-style-type: none"> • Operate and review procedures for dealing with non compliance in line with budget resources. • Continue to work with DfC on Charities Protection Bill. 	<p>We will publish the following ad hoc information.</p> <ul style="list-style-type: none"> • Thematic reports on lessons learnt from dealing with charities. • Press releases of irregular activity.
<p>e) working closely with other government agencies and funders dealing with charities to become the primary hub for identifying risks, lessons learned and charity regulatory data.</p>	<ul style="list-style-type: none"> • Build and develop relationships with funders, regulators and other stakeholders. • Implement options re development of CRM to implement linking/flagging of similar concerns or enquires. • Participate in Organised Crime Task Force and Departmental Fraud Liaison Group. • Communication of lessons learned. • Attendance and close working with the SORP Committee as a full member providing input were required. • Assurance to A&RA committee on MOU/SLAs. 	<p>We will publish information in our annual report on:</p> <ul style="list-style-type: none"> • Our risk based approach to regulation. <p>We will publish the following ad hoc information.</p> <ul style="list-style-type: none"> • Thematic report on follow up on FATF outcomes.

Strategic aim 2 - Progressing charity registration and casework to enhance accountability.	Actions needed	Performance measures and information
<p>We will increase charity transparency by progressing the definitive public list of Northern Ireland charities by:</p> <p>a) operating an efficient and accessible registration process that reflects the definition and norms of charity under the law.</p>	<ul style="list-style-type: none"> • Continue to review and develop systems and processes. • Clarify the position on schools. • Transfer all online forms to new software format and revise to ensure the right information is collected. • Develop and review guidance. • Identify potential grouped registrations. • Identify/work with governing bodies regarding potential grouped registrations. • Amend processes and manuals to reflect as outcomes of Transformation project are identified. • Staff learning and development in processes and caselaw. 	<p>We publish performance information on the:</p> <ul style="list-style-type: none"> • number of registration decisions made by the Commission (target n=160(+/-10%). • 60% registration applications processed within 5 months of receiving a 'complete' application. • number of new applications for charitable status received. • number of <i>Expressions of intent</i> awaiting call forward.
<p>b) providing accurate and timely information about charities freely available and accessible globally through the internet</p>	<ul style="list-style-type: none"> • Create feedback functionality on the website accessibility. • Undertake a Privacy Impact Assessment of the charity register. • Develop and implement process to ensure accuracy of the register, within available resources. • Further explore data sharing and 	<p>We publish information in the annual report on:</p> <ul style="list-style-type: none"> • feedback from users of the register. • downloads of the register. • online search activities. • complaints about data. <p>We will publish ad hoc information on:</p>

	consent requirements (EU directive).	<ul style="list-style-type: none"> research strategy information and reports.
c) publishing information from charities and statutory decisions the Commission has made about them	<ul style="list-style-type: none"> Continue to expand charity footprint on web pages (register). Publish information to give details of appealable orders made by the Commission for and against registered charities. 	<p>We publish information in our annual report on the:</p> <ul style="list-style-type: none"> frequency of updating of the register by charities.
d) Identify those who have failed to apply to register	<ul style="list-style-type: none"> Publish a list of organisation names on the Commission's Combined list. 	<p>We publish information in our annual report on the:</p> <ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Communicate key messages to stakeholders that charities must operate within their purposes and activities. Joint press statement with other regulators on regulatory concerns. 	<p>We publish ad hoc information regarding:</p> <ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Undertake customer survey. Review guidance and manuals with a focus on two priority areas where development of guidance is outstanding. Thematic reports on casework. Amend processes and manuals to reflect the outcomes of Transformation project. 	<p>We publish performance information on the:</p> <ul style="list-style-type: none"> number of casework applications received by the Commission. number of casework decisions made by the Commission. <p>We will publish information in our annual report on the:</p> <ul style="list-style-type: none"> completion of decision reviews

Strategic aim 3 - Demonstrating the public benefit arising from charitable resources and activities.	Actions needed	Performance measures and information
<p>Priority - We will encourage the public to play a key role in holding registered charities accountable by:</p> <p>a) developing public awareness of what charity regulation means and the operation of public benefit.</p>	<ul style="list-style-type: none"> • Communications plan to include broadcasters and use of social media, e-zines, blogs and set out key messages and topics, for example use of poverty exemption, closed group. • Review public benefit toolkit (including public benefit reporting). • Development of 'bitesize' guidance focusing on use of flowcharts. • Implement and review political communications strategy. • Refresh website structure and content. • Develop website to show how to understand and interpret information held on the public register. 	<p>We will publish regular performance information on the:</p> <ul style="list-style-type: none"> • number of telephone and email general enquiries processed by the Commission. <p>We will publish information in our annual report on:</p> <ul style="list-style-type: none"> • concerns from the public • the issuing of regulatory guidance on improved public benefit reporting.
<p>b) providing a resource where the public can raise concerns about charities and/or obtain guidance.</p>	<ul style="list-style-type: none"> • Develop inquiry processes and risk profile on CRM to include public benefit failings. • Train all staff and advise the public about making a concern and common problems we want to hear about. • Thematic report on risk patterns and trends. 	<p>We will publish regular performance information on the:</p> <ul style="list-style-type: none"> • number of concerns received / enquiries opened/closed. • % of concerns received about charities have an initial enquiry risk assessed within 30 days (target 80%) • number of pieces of guidance

	<ul style="list-style-type: none"> • Produce thematic reports on public benefit concerns. 	<p>published.</p> <p>We will publish information in our annual report on:</p> <ul style="list-style-type: none"> • website hits on guidance page • levels of satisfaction with specific pieces of published guidance • public benefit concerns.
c) undertaking a programme of research, including identifying best practice.	<ul style="list-style-type: none"> • Extend the current research strategy and consider future research needs as part of a strategic planning process. • Develop a new 3 year research strategy to reflect internal use of research to set benchmarks and identify partner research bodies/universities to progress research priority areas/issues. • Undertake a mid year review to identify other data that could be published. • Produce mini reports on research. 	<p>We will publish information in our annual report on:</p> <ul style="list-style-type: none"> • research reports. • website hits on reports.
d) publishing a range of open data and research reports reflecting the size, diversity, operations and funding of the charity sector.	<ul style="list-style-type: none"> • Make data open and accessible. • Review publication scheme 	<p>We will publish information in our annual report on the:</p> <ul style="list-style-type: none"> • development of website 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.	<ul style="list-style-type: none"> • Identifying helper groups. • Implement programme of helper groups workshops/training 	<p>We will publish regular performance information on:</p> <ul style="list-style-type: none"> • helper group events per year. <p>We will publish MOUs in agreement with other bodies.</p>

Strategic aim 4 - Developing as a properly governed, transparent and independent decision making body.	Actions Needed	Performance measures and information
<p>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:</p> <p>a) maintaining a focus on organisational governance, culture and values.</p>	<ul style="list-style-type: none"> • Take steps to develop a new strategic plan for 2019-22. • Progress arrangements Support Internal & External Audit fieldwork. • Schedule team development days. • 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). • Implement new General Data Protection Regulations (GDPR) from May 2018. 	<p>We will publish information in our annual report on:</p> <ul style="list-style-type: none"> • Audit opinions • reports on internal compliance • results of staff survey • People Strategy Action Plan implementation.
<p>b) reporting reliable information on performance against targets and standards, and on the use of all available statutory powers.</p>	<ul style="list-style-type: none"> • Quarterly updates on progress. • Regular month end performance reporting. • Lessons learned from Tribunal decisions. 	<p>We will publish regular performance information against a range of corporate performance and service information against targets including the:</p> <ol style="list-style-type: none"> 1. number of website hits

	<ul style="list-style-type: none"> • Implement Assurance checks framework. • Analysing and learning from decisions of other regulators and courts. 	<ol style="list-style-type: none"> 2. number of engagement meetings. 3. % staff absence levels 4. % budget spend revenue (projected) 5. % budget spend capital (projected) <ul style="list-style-type: none"> • % creditors' invoices paid within 10 working days (year to date).
c) ensuring appropriate statutory powers are in place and monitored.	<ul style="list-style-type: none"> • Revision of/completion of Policy Development Plan. • Ongoing work with DfC policy team including Charities Protection Bill. • Review outcome of High Court cases and implement relevant steps to ensure powers are being used lawfully. • Consider implications of cross border charity regulation. 	<p>We will publish information in our annual report on the:</p> <ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • Review relevant policies, procedures and guidance to give effect to Transformation project Phase I recommendations. • Scope more sophisticated risk based ICT systems to deliver outcomes from Transformation project Phase II. • Undertake a PPE of Phase 1 • Review use of NIDirect call handling. • Finalise arrangements to meet new GDPR regulations. • Take forward Privacy Impact Assessments as appropriate. • Implement actions & recommendations from the sponsor department's strategic and capacity reviews. 	<p>We will publish information in our annual report on:</p> <ul style="list-style-type: none"> • project/programme team work • feedback from pilot schemes and critical friends on systems.

	<ul style="list-style-type: none"> • Respond to changes from sponsor department to meet governance requirements. • Exploit further opportunities to use shared services and procurement frameworks. • Assist department identify accommodation needs and relocation, 	
e) monitoring and responding to customer needs and satisfaction.	<ul style="list-style-type: none"> • if necessary replace survey software and undertake customer surveys. • Assurance checks of service standards. • Analyse web usage figures. 	<p>We will publish regular performance information on the</p> <ul style="list-style-type: none"> • number of complaints received about the Commission. • number of information requests (FoI, DPA, EiR) received and responded to. <p>We will publish information in our annual report on:</p> <ul style="list-style-type: none"> • feedback from customer surveys.
f) having a commitment to promoting equality of opportunity and good relations.	<ul style="list-style-type: none"> • Undertake screening as part of policy development. • Gather equality assurance information. 	<p>We will publish an annual report on scheme implementation and achievement of the action plan.</p> <p>We will publish ad hoc information on:</p> <ul style="list-style-type: none"> • equality issues identified through project and program teams • the number of equality scheme complaints.

6. Resources

- 6.1 The Commission's current source of income is 100% 'Grant in Aid' from the sponsor department. The 2018-19 budget has been confirmed by sponsor branch reflecting the overall parameters set as part of the 2018-19 budget settlement and departmental allocations. Also expenditure will be revised as costs related to office relocation are identified.

Item	2017-18 Baseline	2018-19 As is
Commissioners' remuneration	£19,263	£20,700
Staffing costs	£1,175,159	£1,260,168
Staff/Commissioner non-remuneration costs	£168,185	£59,801
IT costs	£94,500	£97,000
Premises costs	£83,975	£118,975
General running costs	£27,800	£50,833
Programme delivery costs	£67,118	£213,323
TOTAL REVENUE COSTS	£1,636,000	£1,820,800
Capital costs	£80,000	£235,000 ²
Total capital costs		
Overall total	£1,716,000	2,055,800

² Assuming £60k capital is made available for all ICT Strategy related spend, £170k for transformation and £5k for security enhancements in 2018/19

Budgeting Assumptions

6.2 Baseline resource budget is reduced by 4% from 2017-18. A capital budget will be allocated to the overall ICT strategy which will be to 'piggy back' CCEW ICT developments where most advantageous. The Commission will seek to be included in CCEW's programme at proportionate cost. This has been estimated at £60k for work identified under 2018/19 ICT strategy. Submissions will be made for a further substantial amount to cover phase 2 of the Transformation project in 2018-20.

Commissioner costs	There will be no provision for annual increase in Commissioners or related costs. Assumed full complement in place from Qtr 1.
Staff remuneration	25 staff (full complement). No additional staff for compliance monitoring work but redeployment to undertake compliance work of 0.4 FTE casework officer and 1 FTE enquiries support officer.
Staff/Commissioners non-remuneration costs	Continued use of HR connect. Training costs 1% of salary costs, priority will be investment for staff to provide compliance monitoring capacity to deal with peaks around bottlenecks. £168k allocated for agency staff needs which may arise during the year.
IT costs	ICT budget remains unchanged, reflecting CCEW and IT Assist hosting charges.
Facilities/premises costs	Facility/premises costs remain unchanged.
General running costs	Costs increased to £51k compared to £28k in 2017-18, reflecting on-boarding to NIDirect for call handling (based on actual total call duration by an hourly charge rate).
Programme costs (excl legal and professional costs)	Legal spend increased to £87k compared to £43k in 2017-18, £100k included for forensic accountancy and investigation services and £9k included for communications. Membership fees increased to £11,500 compared to £8,500 in 2017/18. Communications, events and hospitality, investigation and interviewee costs remain unchanged.
Legal and professional costs	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, Court of Appeal following on from High Court actions, first use of powers in Act, general opinion on legal registration/compliance referrals, forensic accountancy services and research.