

Business Plan 2019-20

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

This plan covers a period when the Commission will mark the tenth anniversary of the commencement of the Charities Act (Northern Ireland) 2008 on 27 March 2009. Following the commencement, a Board of Commissioners was appointed and an organisation established with a range of governance polices and operational procedures to give effect to the Commission's statutory powers and duties.

In the subsequent period the Commission has produced a range of strategic plans setting out how it would create the first charity register in Northern Ireland and then manage ensuring compliance with the annual accounting and reporting regulations made in 2015. In the early days the Board adopted a low risk appetite for what was new and untested regulation and approved the operation of procedures by staff which were detailed and had significant levels of assurance checks. After several years of operation and experience, combined with limited resources, the Board intends during this plan to change its risk appetite. This means operating streamlined procedures to speed up processes and accepting the increased potential for errors and omissions that could arise, in the interests of building the charity register faster to enable public accountability and having regulatory oversight over the greatest possible number of charities.

There are over 6,358 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. It is anticipated by the end of this plan over 6,000 charities' annual reports and accounts will be on display and accessible through the Commission's website.

The Commission will continue to operate with the resources made available by its sponsor department, the Department for Communities (DfC). This plan reflects the first year of the Board's agreed strategic plan which is based on a budget increased by £300k to the baseline to enable more focus on emerging strategic risks to the charity sector and targeting our regulatory action at the highest risk cases. This will result in increased self-regulatory action, advice and quidance, where appropriate.

In the Board's view, additional resourcing will enable it to make changes and operate more effectively as a proportionate and risk based regulator in an environment where new risks, such as safeguarding, are emerging. Activities will include complex casework, enquiries, and defending legal challenges taken against the Commission and Charity Tribunal decisions.

Due to ongoing litigation relating to how the Commission makes decisions, there is a risk that some targets, which relate to numbers of decisions, might not be reached in this year. Revised decision-making procedures have been put in place for certain decisions as the outcome of litigation will not be known until well into the year. Work on cases is continuing, however, targets may need to be reported in a different way at year end

During the plan the Chief Commissioner's term will end and several appointments to the Board will be undertaken by DfC. This is important to

ensure legal requirements governing the operation of the Commission are maintained. The Commission will also relocate to new offices.

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 6,358 charities on the public register with a range of charitable purposes intended to deliver public benefit in Northern Ireland.

The Commission's 2019-22 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
- 2 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.

The Commission's corporate risk framework includes a range of issues which could impact on the Commission's 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 2019-20. These include building the charity register by processing 475 (+/-10%) cases to closure by year end and basic compliance check of approximately 17% of annual return submissions.

This plan also details key priorities that will be progressed to deliver the four strategic themes during 2019-20, 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:

- addressing new risks to the charity sector including safeguarding
- redesigning registration procedures to speed up processes and build the register
- continuing to expand the charities' footprint on register web pages
- reviewing and updating the online annual monitoring return form 2019
- implementing automated checking of annual returns where possible
- focusing on charities with a history of serious non-compliance and high risk
- office relocation.

The Commission's current source of income is 100% 'Grant in Aid' from the sponsor department. The Commission's 2019-20 baseline resource budget has been confirmed as £1,671k with a non-reoccurring allocation of £209k reflecting the resourcing envisaged to deliver the first year of the 2019-22 strategic plan i.e. £1,880k. This represents an increase in baseline from the 2018-19 baseline resource budget of £1,571k, and in part mirrors uplifts in allocations made to other charity regulators in the UK and Ireland.

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 6,358 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 2019-22 strategic plan details the organisation's strategic themes and priorities for the period of this business plan as:
 - progressing charity registration to enhance accountability.
 - developing compliance regarding the use of charitable resources
 - 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 Changes in the charity sector addressing safeguarding risks will be a major challenge and the Commission will work to further improve governance standards in light of public concern and government attention, thus addressing potential for public confidence in the sector to be undermined.
 - 2 Resourcing a series of further efficiency changes to processes will be made, meaning low risk cases will be deprioritised and/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 may result in regulatory requests being noted and going unmet on particular occasions.
 - 3 Reprioritising registration meeting the requirement for charities to register provides the most effective foundation for regulation, and increased resources and amended procedures will be used to make a significant increase in the number of decisions on registration applications. Some of these changes will mean the timescale for making a complete application is reduced, so potentially those that do not take the opportunity will find themselves going to the back of the queue, leaving poor practice undetected.
 - 4 Litigation brought against us although Court and Tribunal judgements are an opportunity to clarify and establish case law, this has had 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.
 - 5 Governance During the period covered by this plan, the Chief Commissioner's period of appointment will end and a number of Commissioner appointments must be made if the Commission is to continue to be able to legally operate. Changes in devolution arrangements and developments in oversight and governance arrangements by the sponsor department will require staff time/resourcing which must be managed alongside a range of other legal obligations as a public body.

4.0 Business Results and Key Performance Indicators for 2019-20

4.1 The Commission aims to achieve a range of business results and key performance indicators (KPIs) in 2019-20. The main key performance indicators which will be reported quarterly are:

External KPIs

- Continue to build the charity register by processing 475 (+/-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 approx. 17% of annual return submissions due¹; and
- Process 80% of self regulatory and 60% of regulatory enquiries to closure within 6 months of respective² risk assessments.

Internal KPIs

- Manage the organisation within 1% budget;
- Manage staff sickness absence within 8%; and
- Pay 90% of suppliers within 10 days.
- 4.2 The increase of the registration targets to 475 in year one reflects increased resourcing and training time for new staff, increases in the range of casework, and building in time for putting into effect transformation and streamlining of registration and casework processes. The investment of resources and results of transformation is anticipated to mean that at year end the Commission can more than double the number of annual registration decisions as well as significantly increase the volume and variety of registration casework decisions. At the start of 2019-20 there were approximately 81 open registration applications and 72 open casework applications.
- 4.3 This plan also details key priorities that will be progressed to deliver the four strategic themes during 2019-20. 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 17% to be confirmed. 2018/19 breakdown reflected 100% of returns made under SORP and 1 in 4 of smaller charities returns due.

² As per specific performance measures detailed under Strategic Aim 2b page 10

5. Actions and Measures

Strategic Aim 1 - 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) continuing to build the register through redesigning registration procedures to speed up processes and using risk to prioritise	 Give effect to Transformation project Phase II by updating OLAR and EOIs forms, increase role of NI Direct to make call outs, revise manuals and guidance materials and update videos and workshops. Gather additional Trustee information to improve notification about legal obligations. Identify potential grouped registrations. Identify/work with governing bodies regarding potential grouped registrations. 	 We publish performance information in annual reports on Number of Registration decisions made by the Commission (target n= 475 (+/-10%). 60% Registration applications processed within 5 months of receiving a 'complete' application. Number of new applications for charitable status received. Number of Expressions of Intent awaiting call forward.
b) Skewing resources back towards the casework team to ensure registration is prioritised	 Redeploy internal resources. Undertake necessary recruitments and staff training. Staff learning and development in processes and case law. 	We publish information in the annual report on • Efficiency improvements in registrations.
c) Publishing information from charities and statutory decisions the Commission has made about them	 Continue to expand charity footprint on web pages (register). Consider publishing additional charity documents and information. Publish information to give details of appealable orders made by the 	We publish information in our annual report on • Frequency of web hits on charity register pages • Frequency of updating of the register by charities.

	Commission	
d) Introducing internal de minimus levels for certain consents	 Produce an options paper for Board consideration and take forward policy options approved by Board. Undertake consultation. Revise relevant procedures and on line systems. Produce guidance. 	We publish information in our annual report on the number of consents and charitable assets affected.

Strategic Aim 2 - 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) Improve annual return process by reviewing processes, automating checking, where possible, and introducing de minimus levels for checking.	 Review relevant monitoring & compliance policies, procedures and guidance to give effect to Transformation project Phase II. Review proportionality criteria. Further develop a risk based approach to regulation including implementation of automated checking of annual returns where possible. Review and update the on line Annual monitoring return form 2019 to enable automatic processing of key information in appropriate circumstances. Mid-year review of proportion of 	 We will publish regular performance information on % of Annual Monitoring Returns submitted to the Commission subject to basic compliance checks (target 17% of returns due). % of cases who failed to submit their accounts on time and marked on register as in default % 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%).
	accounts undergoing compliance	We will publish information in the annual

	 checks by end December 2019. Develop the Commission's non statutory 'Annual return regulations 2019'. Public communications programme. Thematic reports detailing monitoring review of charities reporting under the new Accounting and reporting regulations 2016 and quality of small charity accounts received by the Commission. 	 report on Number of adverse qualifications. Number of concerns about charity accounts. Number of S23 orders issued (for default cases). Number of statutory inquiries opened for default cases.
b) Improve compliance with the Charities Accounts and Reports regulations NI 2015 through issuing regulatory guidance requesting accounts resubmission for serious noncompliance identified through basic compliance checks	 Communicate key message that all reporting is now under the regulations and not interim arrangements. Review and update suite of accounting and reporting guidance. Operate fully documented compliance and monitoring procedures. Focus on longest history of serious non compliance and high risk Sharing of experiences and compliance cases with CCEW/OSCR/CRA. Participate as full member of charities SORP committee 	 We will publish regular performance information on: No. of instances regulatory guidance issued for failed accounts checks % regulatory guidance complied with No./proportion of regulatory guidance letters issued to charities in default No./proportion of S23 Orders issued to charities in default % initial compliance assessments completed within 30 days (target 50% of those received). % of self regulatory enquiries processed to closure within 6 months of initial risk assessment (target 80%). % of regulatory enquiries processed to closure within 6 months of full risk assessment (target 60%). % decision on complete waiver applications within 30 working days (target 100%). We will publish information in the annual report on Number of instances of regulatory

r r f t	Implementing new mechanisms for 'marking the register' when charities have failed basic accounts checks on their annual monitoring returns, to increase transparency and efficiencies	 Develop IT functionality that enables marking of the public facing register with charities compliance history. Maintain and operate compliance procedures to focus action on charities that fail to submit annual reporting information focussing on those oldest and highest risk charities. Promptly communicate with Charity trustees and risk assess responses. Communicate with relevant authorities. Explore display on register for enquiries regulatory issues. 	 advice being offered. orders & directions, opening of statutory inquiry, thematic reports resulting from actions taken in enquiries and compliance. We will publish regular performance information on: number of charities that have failed basic accounts checks. We will publish information in the annual report on Number and type of closures Filing response rate to regulatory guidance
	Undertaking preventative work on AMRs to reduce fails and non-submissions	 Operate and review procedures for dealing with non compliance in line with budget resources. Provide workshops for charities due to submit their first AMRs. Continue to work with DfC on Charities Protection Bill. 	 We will publish ad hoc information on: Thematic reports on lessons learnt from dealing with charities Press releases of irregular activity.
6	Applying proportionality criteria and risk framework to ensure prioritisation of enquiries resources towards only most serious cases	 Develop enquiries procedures to focus resources on where regulatory action is most appropriate in the circumstances of specific concerns. Timely action will be taken against charity Trustees and/or Officers, and the risk level shared as 	We will publish information in our annual report on Our risk based approach to regulation. Mo of enquiry cases older than 12 months processed to closure. We will publish ad hoc information on:

	appropriate.Action taken on submission of false information.	Thematic reports on substantiated concerns and outcomes.
f) Addressing new risk issues such as safeguarding within registered NI charities by bringing the greatest number of charities on to the register as fast as possible, thus bringing them within our regulatory view, and undertaking targeted interventions such as thematic reviews.	 Enhance the Expressions of Intent processes to manage safeguarding risk. Increase frequency of contact with charities. Serious Incident reporting thematic report. Specific SIR guidance for safeguarding. Increase information about safeguarding gathered at registration stage. 	 We will publish information in our annual report on The no of organisations working with vulnerable adults and children on the Expressions of Intent list We will publish ad hoc information on: Thematic report on follow up on FATF outcomes.

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	 Public communications plan to include key messages and topics eg accuracy & use of the register, poverty exemption, closed group. Development of 'bitesize' guidance and use of infographics Implement and review political communications strategy with a focus on local government and MLA outreach. Commence refresh of website 	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.

		structure & content.	
b)	providing a resource where the public can raise concerns about charities' public benefit and/or obtain guidance.	 Monitor inquiry work to identify unsubstantiated issues at the earliest point. Thematic report on risk patterns and trends. Review guidance "Concerns about charities" to include specifics on Public Benefit Reporting 	We will publish regular performance information on Number of concerns received / enquiries opened/closed. 'w of concerns received about charities have an initial enquiry risk assessed within 30 days (Target 80%) We will publish information in our annual report on website hits on concerns page. public benefit concerns.
c)	undertaking a programme of research, including identifying best practice	 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. 	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	 Develop a research strategy. Make data open and accessible. Review Publication Scheme 	We will publish information in our annual report on 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	 Provide direct feedback to helper groups on applications Implement programme of helper group workshops/training on issues related to sectoral risks. 	We will publish regular performance information on • helper group events per year. Publish MOUs in agreement with other

accountable, while retaining ou independence.	•	Quality assure and provide direct feedback on helper group work with charities.	bodies.

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	 Implement strategic plan 2019-2022. Schedule Team Development Days. Refresher Programme on organisational governance & culture for Commissioners, Committee members and staff. Induction for new Board members Support Internal & External Audit fieldwork. Manage assurance processes to confirm progress on remedial actions. External Board Assessment exercise. 	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	 Monthly and quarterly updates 	We will publish regular performance

performance against targets and standards, and on the use of all available statutory powers	 on progress against business plan. Measure Customer charter standards. Implement Assurance checks framework. Analysing and learning from decisions of other regulators and courts. 	 information against a range of corporate performance and service information against targets including. Number of website hits. Number of engagement meetings. % Staff absence levels. % budget spend revenue (projected). % budget spend capital (projected). % Creditors' invoices paid within 10 working days (year to date).
c) ensuring appropriate statutory powers are in place and monitored	 Ongoing work with DfC policy team including Charities Protection Bill. Operate project monitoring and implementation arrangements to demonstrate Transformation project Phase II is in effect. Undertake a PPE of Phase 1 Review use of NI Direct call handling. Take forward Privacy Impact Assessments as appropriate. 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 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	 Recruit and train new staff. Analyse web usage figures. manage range of on line customer surveys. Assurance checks of service standards. Review use of NI Direct call handling. 	We will publish information in our annual report on Project/programme team work. Feedback from pilot schemes and critical friends on systems.

	 Take forward Privacy Impact Assessments as appropriate. Respond to changes from sponsor department to meet governance requirements. Exploit further opportunities to use shared services and procurement frameworks. 	
e) monitoring and responding to customer needs and satisfaction	 if necessary replace survey software and undertake customer surveys. Assurance checks of service standards. Analyse web usage figures. 	 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 on Feedback from customer surveys.
f) having a commitment to promoting equality of opportunity and good relations.	 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 equality scheme complaints.
g) Undertake relocation.	 Develop project plan. Secure appropriate budget. Undertake user acceptance testing of new facilities prior to move. Snag list cleared. Manage move arrangements with minimal disruption to service. Undertake post project evaluation. 	We will publish details in the Annual Report.

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	2018/19 Baseline	2019/20 As is	
Commissioners' Remuneration	£20,700	£20,908	
Staffing Costs	£1,149,369	£1,440,699	
Staff/Commissioner Non-Remuneration Costs	£59,801	£81,296	
IT Costs	£97,000	£99,700 £79,975	
Premises Costs	£79,975		
General Running Costs	£50,833	£40,500	
Programme Delivery Costs	£113,322	£114,922	
TOTAL REVENUE COSTS	£1,571,000	£1,880,000	
Capital Costs	£62,000	£257,000 ³	
Total Capital Costs			
Overall Total	£1,633,000	£2,137,000	

Budgeting Assumptions

³ Assuming an additional £80100k capital is made available for transformation in 2019/20.

Baseline Resource budget has increased by £100k from 2018/19. In addition, a non-recurrent allocation of £209k has been secured. 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 approx £40k for work identified under ICT strategy in 2018/19 and £15k for 2019/20. £202k will be available to cover Phase 2 of the Transformation project including £102 for a tail of work from 2018/19 and £100k for 2019/20.

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	28 staff (full complement) plus 6 fixed term posts.				
	3 additional staff for Compliance Monitoring work with 1 FTE Enquiries Support Officer				
	redeployment to undertake compliance work.				
Staff/Commissioners non-	Continued use of HR connect. Training costs 1% of salary costs, priority will be investment				
remuneration costs	for induction of new permanent and fixed term staff. Allocation for agency staff needs in				
	quarter 1 and 2 pending recruitment of staff, other needs 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 and the department will make in year provision for				
	security costs.				
General running costs	Costs £42.5k compared to £34k in 2018/19, reflecting on-boarding to NI Direct for call				
	handling (based on actual total call duration by an hourly charge rate).				
Programme Costs (excl legal	£30k included for communications in line with new 2019-22 Comms Strategy compared to				
and professional costs)	££9k previously. Membership fees remain at £12k as per spend in 2018/19. Events and				
	hospitality, investigation and interviewee costs remain unchanged.				
Legal and professional costs	Legal & professional spend £67k compared to £174k in 2018/19, £10k included for forensic				
	accountancy and investigation services. Assumption is spend for legal cases begun in				
	previous year provided for in provisions. Other spend includes use of legal opinion for				
	ongoing advice (retained Counsel) and representation in Tribunal vis enquiry and casework				
	cases, High Court appeal following on from Tribunal actions in year. Cost re any Court of				
	Appeal following on from High Court actions will form part of in year bid. £18k spend on first				
	use of powers in Act, general opinion on legal registration/compliance referrals, £14k on				
	forensic accountancy services and research.				

Gantt chart of Key Actions in 2019-20

	Quarter 1	Quarter 2	Quarter 3	Quarter 4
Recruitment and training of staff				
Relocation				
New Board members induction				
Review proportionality criteria				
Develop Thematic review prog re groups of charities where safeguarding is a high profile issue				
Change in AMR question style to enable automation				
Pilot automated AMR testing				
Review compliance monitoring framework				
Mid year review of proportion of accounts undergoing compliance checks				
Develop non statutory AMR regs 2019				
Action taken on submission of false information				
Produce specific guidance on safeguarding & SIR				
Develop research strategy				
Provide direct feedback to helper groups on applications				
Thematic report on risk patterns and trends				
Transformation Phase 2				