

Business Plan 2022/23 V 1.0

Approved by DfC Minister

Foreword

The Commission's 2022/23 Business Plan will cover the final year of our Strategic Plan agenda for 2020 to 2023. In previous years that agenda had been adapted to take account of changes in the external environment as a result of the pandemic and Court of Appeal judgement (Feb 2020).

During the period of this business plan, the Commission will develop a new three-year strategic agenda for 2023 to 2026. We will work closely with our sponsor department and deliver wider engagement with stakeholders to bring forward the agenda for change to charity regulation in Northern Ireland as set out in the Minister's Independent Review of Charity regulation report¹ and the Charities Act (NI) 2022². The Commission embraces the opportunity to review recommendations present to reset the culture of regulation and move into our next chapter as we evolve as a more collaborative and enabling regulator.

We also look forward to strengthening our partnerships and collaboration with the wider charitable sector in order to continue developing a robust and supportive regulatory environment for charities. We will implement as much of the Independent Review's recommendations which relate to the Commission as our resources allow, setting out the main bulk of delivery aims and activities in our next three-year strategic plan. Not all of the Independent Review's many recommendations can be delivered at once, and, while we intend to make a start this year, we would seek to manage expectations that everything can be delivered quickly.

To create capacity for, and manage change efficiently, some strategic choices have been made in the plan. The focus will be on registration which may mean casework decisions, such as schemes and consents, may take longer than the Commission would ideally wish. A range of process developments will also be delayed slightly until the proposed Scheme of Delegation envisaged under the Charities Act (NI) 2022 is finalised and amended processes can be put in place. In line with the related Independent Review conclusion, all pre and post registration closure checks will be stood down for a period of time.

This plan also envisages accounting & reporting guidance materials will be reviewed and improved, as part of enabling charities to understand and comply with their statutory reporting requirements. This, we hope, will help to reduce high levels of compliance checks on annual returns submitted or those who fail to submit as required by annual reporting regulations. The vast majority of charities recently reinstated to the register by the Charities Act (NI) 2022 are not required to file their annual reports and accounts in the current year. Nevertheless, some checks will be undertaken, and it is hoped those who have not voluntarily kept their annual report filing and entries on the charity register up to date will now do so. If this transparency is not maintained and gaps appear - then donors, beneficiaries and the public will not be able to have full confidence in specific charities and the wider charity sector.

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¹ Independent Review of Charity Regulation Northern Ireland (communities-ni.gov.uk)

² Charities Act (Northern Ireland) 2022 (legislation.gov.uk)

In the absence of Executive agreement the Commission has been given an indicative budget for the year. Finalisation of resourcing for 2022/23 and adoption of the Independent Review will be subject to the outworking of the May 2022 Assembly Elections. This poses some major uncertainty but the Commission will continue to deliver ongoing regulatory work and progress changes to a range of priority areas that are within our own control. The Commission has adapted to change and development since its inception and anticipates responding with support from its sponsor department.

Nicola Lappin Chair Frances McCandless Chief Executive

Executive summary

Section 1 sets out an introduction to the Commission and its statutory objectives.

Section 2 outlines the Commission's Strategic Vision, Purpose and Values.

Section 3 of the document sets out a number of risks relevant to planning assumptions for the next financial year and beyond. These will be kept under review in terms of developing a corporate risk register for 2022/23.

Section 4 details the range of external and internal business results and key performance indicators (KPIs) for 2022/23. Success will be measured in a range of ways, from growing the register, familiarising all charities with their annual reporting obligations and best practice, improving our services and communications based on charity sector and partner feedback, increasing online digital interactions with our stakeholders, changing processes to reduce timelines around low risk casework, delivering our corporate governance and publication commitments, and delivering business plan commitments on time and within budget.

Section 5 of the plan 'Delivery and Measures' sets out a range of actions that will be progressed in the course of business to deliver the strategic aims and performance levels. These are designed to enable the Commission to continue core service activities while making changes to respond to Minister's Independent Review of Charity Regulation recommendations related to the Commission and the Charities Act (NI) 2022. A focus will remain on future strategic planning and setting a more long term agenda.

Section 6 outlines the initial resource budget and assumptions.

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. 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.
- 1.2 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.
- 1.3 The Commission has five statutory objectives under the Act:
 - to increase public trust and confidence in charities.
 - to promote awareness and understanding of the operation of the public benefit requirement.
 - to promote compliance by charity trustees with their legal obligations in exercising control and management of the administration of their charities.
 - to promote the effective use of charitable resources.
 - to enhance the accountability of charities to donors, beneficiaries and the general public.

2.0 Commission Vision, Purpose and Values

2.1 The Commission's Vision is:

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

2.2 Our Purpose is:

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

2.3 The Commission works with its various stakeholders and provides services which reflect our Corporate Values of being:

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

3.0 Strategic Aims and Risk Framework for 2022/23

- 3.1 Following publication of the Independent Review of Charity Regulation (January 2022) and coming into effect of the Charities Act (NI) 2022 (March 2022) the Board considered and agreed that in 2022/23 the organisation will focus on the following as our business objectives:
 - Objective 1: Progressing charity registration to enhance accountability
 - Objective 2: Developing as an enabling regulator
 - Objective 3: Delivering proportionate regulation
 - Objective 4 Developing as a properly governed, transparent and independent decision making body.
- 3.2 The range of strategic risks that the organisation faces while implementing this business plan will include:
 - The Independent Review of charity regulation presents opportunities to transition to being a more enabling regulator. There is a risk that delivery of the transition in systems and processes is not properly managed, thus reducing the ability to demonstrate real change which impacts on public confidence in the regulator.
 - Stakeholders may be unwilling or unable to engage with the Commission in its planned increase in stakeholder engagement, thus reducing their experience of engagement, their trust in the Commission and the anticipated benefits in shaping and delivering change.
 - Perceived slowness in effecting the culture change to an enabling regulator recommended in the Independent Review of charity regulation and lack of visible evidence may lead to further complaints and criticism.
 - The opportunities for better staff retention and satisfaction, and better work/life balance presented by hybrid working may not be realised because of HR challenges, impacting on staff motivation and service outputs.
 - Resources may be reduced in year leading to reduced quality or levels of service and reputational damage.
 - There is a risk that the business plan registration target may not be reached due to the complex nature of many of the remaining cases awaiting registration known to the Commission and the fact that many raise issues to be resolved which are not within the Commission's control, such as the policy position on registering schools.

Although the Charities Act (NI) 2022 provides for a Scheme of Delegation to be introduced, no decision has yet been taken by Minister. Any prospective Scheme would be subject to public consultation. This creates difficulty in planning delivery targets, and the arrangements currently in place mean slower decision making in many areas of regulatory activity which could lead to complaints about delays, which could be seen in certain cases to damage the work of charities.

3.3 Some external factors will require time to manage effectively eg introduction of hybrid working to mitigate any future potential impact of a pandemic on service delivery. Some issues have been realised eg additional litigation and reintroducing high levels of compliance behaviour by charities. The main new risk that will exist in the coming year is uncertainty regarding implementation of the Independent Review and resourcing of the Commission related to it.

3.4 The focus on registration means that resources will be drawn away from some types of casework, and this may present risks to the charities requiring decisions. However, finite resources mean that some areas must be deprioritised and this will be monitored during the year.

4.0 Business Results and Key Performance Indicators for 2021/22

- 4.1 The Commission aims to achieve a range of business results and key performance indicators (KPIs) in 2022/23. These are based on the indicative level of resourcing from sponsor department of £2,122k resource.
- 4.2 The key performance indicators which will be reported quarterly are:

External KPIs

- continue to build the charity register by processing 550 (+/-10%)
 cases to decision by year end (based on an assumption of receiving
 the requisite number of complete applications);
- process 75% of registration applications to decision within six months of receiving a 'complete' application;
- review 15% (up to a maximum of 50) Annual Monitoring Returns of charities unaffected by the legal judgment.
- 60% of enquiry cases concluded within nine months of receipt of concern.

Internal KPIs

- manage the organisation within 1% budget;
- manage staff sickness absence within 3%; and
- pay 90% of suppliers within 10 days.
- 4.3 The increase in the registration target in 2022/23 reflects the ongoing use of decision-making processes required as a result of the outcome of litigation and a review of how effectively systems were operating last year. This target may be challenging to meet as many of the organisations that are waiting to register present complex challenges and some, such as schools, require policy decisions to be made by departments that are beyond the Commission's control. The target relating to enquiries has been made more ambitious by reducing the time within which cases will be closed. At the end of 2021/22 there were in the region of 350 open registration applications, 93 casework applications and 72 open enquiries ongoing. During 2021/22 the Commission achieved 83% of actions and milestones under the four strategic themes in the business plan. This results is similar to that achieved in 2020/21.
- 4.4 Section 5 of this plan details key actions and milestones that will be progressed to deliver the four strategic themes during 2022/23. The plan does not detail the significant range of regular and routine work involved in operating as a public body that is carried out by the Commission, particularly in relation to the Commission operating as a public body and its own governance.
- 4.5 In addition, to maintain a focus on continuous improvement, the Commission will work with sponsor department on any additional resourcing that becomes available during the year that will enable improved delivery of service and output levels.

Actions and Measures

Business Objective 1: Progressing charity registration to enhance accountability

Strategic Aim 1 - Progressing charity registration to enhance accountability.	Actions needed	Performance measures and information
Priority - we will support accountability of the sector through growing the register by: a) Continuing to build the register with a focus on prioritising progression of registration of remaining deemed charities and amending the Combined list in line with Independent review.	 Bring registration recommendations to Schedule 1 Committee Analyse remaining deemed organisations awaiting call forward and consider plans for taking them forward. Analyse those complex/special circumstance cases remaining on the combined list and consider plans for taking these forward. Consider provision of call forward turnaround times to accompany Combined list. Scope amendments to website and guidance for Combined list 	 We publish performance information in our annual report on: Number of recommendations for, and decisions on, Registration made by the Commission (target n= 550 (+/-10%). Time taken from receipt application to decision process 75% of registration applications to decision within six months of receiving an application. Number of new applications for charitable status received. Number of new Expressions of Intent received. Number of users accessing prerecorded online workshop. Publication of half-yearly regulatory snap shot and infographic. Publication of updated Combined list and web text.
b) redesigning registration procedures to reflect use of proportional information requested of charities and risk factors to speed up registrations and ensure	 Evaluate and bring forward recommendations on registration pilot. Carry forward any approved changes to manuals and guidance falling out of the registration pilot review and raise awareness of changes in the 	We publish performance information in our annual report on: Outcome of registration pilot

only required information is sought from charities	 sector Implement and review effectiveness of registration materials and new Online Application for Registration (OLAR) questions. Explore and develop options for simplified process for smaller organisations and develop a further information matrix. Ensure updated online customer surveys reinstated and sample of applicants surveyed. 	We will publish updated Registration guidance in a range of formats and media(infographic and vlog)
c) Providing enhanced guidance about other options to charity registration and a range of schemes	 Develop and publish external guidance on other options in a range of media formats (infographic and vlog) Provide sector with more guidance on specific casework areas. Publish S31 of the 2008 Act schemes guidance to support applicants Develop S54 of the 2008 Act internal guidance to support staff and consult on external guidance to support applicants 	We will: Publish guidance on other options to charity registration S31 of the 2008 Act schemes

Business Objective 2: Developing as an enabling regulator

Strategic Aim 2 - Developing as an enabling regulator	Actions	Performance measures and information
Priority - We will respond to the development of charity regulation by: a) working with sponsor department and other charity regulators and stakeholders to take forward key regulatory developments	 Support the Department develop and progress a workplan for the implementation of recommendations in the Independent Review Report. Work with DfC on a prospective Scheme of Delegation. Prepare for and implement the outworking of any agreed scheme of delegation. Meet with other regulators in Scotland, England and Wales and Ireland, to learn from their experiences of shifting to enabling, authoritative and engaging language and activities. Continue to contribute to the development of the new Charity SORP through the Charities SORP Committee and engagement with partners and via our role in the charities SORP-making authority (as resources allow). 	We will publish information in the annual report on: • Progress on recommendations taken forward in the business plan. • Progress of any scheme of delegation.
b) Developing and implementing an effective engagement strategy reflecting a key role for the Stakeholder forum to inform the Commission's thinking across a range of areas.	 Scope and consult on a draft Engagement strategy. Implement Engagement strategy which encompasses developing the Stakeholder Forum, working with helper groups, Essential Trustee training, virtual roadshows. Engage with the stakeholder forum to develop and launch a range of revised Commission templates. Rework key pieces of guidance (including financial) and test with Stakeholder Forum and Helper Groups to inform future guidance work. Assist the Stakeholder forum to undertake a review of its effectiveness. 	 We will publish information in the annual report on: Development of engagement forum. Number of times Stakeholder forum met

	Share relevant experiences with UK and Ireland charity regulators.	
c) Developing a new communications strategy to change the Commission's communication culture and enhance effectiveness of key communications channels.	 Review the website structure and bring forward options for changes informed by stakeholder input Review use of NI Direct and pilot direct contact with Commission staff within limited hours, as resources allow taking into account impact on various teams work. Undertake review of range of policies, procedures and templates with stakeholder input (tone of voice guidance, generic signature policy, letters, acknowledgements feedback, online guidance). Consider communications strategies for how guidance can be improved. 	We will publish information in the annual report on: Usage of website Feedback from users on changes to website NI Direct service activity Feedback from users on NI Direct

Business Objective 3: Delivering proportionate regulation

Strategic Aim 3 - Delivering proportionate regulation	Actions needed	Performance measures and information
Priority - we will support compliance by charity trustees with their legal obligations and address non-compliance by:		
a) Implementing annual return process including risk based checking, and preparation for automating selection for risk based checking	 Implement and Evaluate new online Annual Monitoring Return (AMR) form and guidance. Ensure updated online customer surveys reinstated and sample of applicants surveyed. Agree risk based parameters for selection of Annual Monitoring Returns for checking. Review a risk based sample of Annual Monitoring Returns (basic compliance checks) for compliance with reporting regulations 15% (up to 50) of Annual Monitoring Returns due (N=360) to the Commission from charities unaffected by the legal judgment. Monitor failed basic compliance check outcomes relating to accounts re-submission and proportionality, in order to inform potential changes to manual/procedures in Q3/4. Take appropriate action if annual returns are not submitted by charities as required by the law. Monitor emerging risk issues as they appear through Commission processes and maintain existing focus on Safeguarding issues as they arise. Ensure accuracy of register by updating financial year end dates in the event of change requests or final year end dates following notification of closure. 	 We will publish information in the annual report on: 15% of Annual Monitoring Returns due (up to 50) to the Commission from charities unaffected by the legal judgment subject to basic compliance check. 100% of charities checked (BCC's) with 'serious' issues in accounts issued with guidance on how to improve AMR submission Report % of charities who failed to submit their accounts on time and marked on register as in default or equivalent status when status switched back on. Number of concerns about charity accounts. No of annual monitoring returns received by the Commission voluntarily by charities affected by the judgment and not legally required to submit a return Meetings: SORP Committee/stakeholder groups

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b) Developing annual reporting to facilitate the Charities Act (NI) 2022. c) Applying proportionality criteria and risk framework to ensure prioritisation of enquiries' resources towards only most serious cases	 Test and implement new rules to ensure ICT systems generate AMRs for charities as required by the Charities Act (NI) 2022. Undertake Comms strategy related to charities affected by voluntary and mandatory filing. Consider the reinstatement of annual reporting status on the register, and make any necessary amendments to reporting deadlines. Explore a traffic light system that allows greater differentiation between filing defaulters. Update the suite of accounting and reporting guidance documents (8 pieces) and webtext to reflect the new annual reporting rule from the Charities Act (NI) 2022. Develop 'Independent examination or audit?' bite size guidance piece for use by charity trustees. Hold information sessions with sector and advisors. Timely action will be taken to remedy issues identified in charities to include bringing enquiries recommendations to Sch.1 Committee, where appropriate. Review long running inquiries with a view to reaching the necessary decisions to close them out in a timely and effective fashion. 	We will publish information in the annual report on: • % of concerns received about charities which have an initial enquiry risk assessment within 30 days (Target 80%) • % of enquiry cases concluded within 9 months of receipt of concern (target 60%) • % of enquiry cases older than 12 months processed to closure. • Our risk-based approach to regulation. • Number of concerns received / enquiries opened/closed. • Number of recommendations brought to Sch.1 Committee

		 and regulatory guidance issued Number of orders & directions issued Number of statutory inquiries opened.
d) Developing enquiries processes	 Review enquiries manual to incorporate lessons from the Review by Independent Counsel Revise approach to recording decisions and publication of information in inquiry reports. Review communications around compliance and communication with those who raise concerns. Seek feedback from users on changes. Review internal review process and consider the approach taken by the Office of the Scottish Charity Regulator. 	 We will publish information in the annual report on: Implementation of the Action Plan arising out of Independent Counsel's final report.

Business Objective 4: Developing as a properly governed, transparent and independent decision making body.

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 2020-23. Develop a new strategic plan for 2023-26 Board self-assessment exercise Ongoing Board and staff programme to develop organisational governance & culture. Support Internal & External Audit fieldwork. Meet sponsor department governance requirements. Review Commission operating procedures, including schedule 1 and ensure that staff are fully briefed on the nature and format of material that Commissioners need to exercise the full scope of their powers effectively. Complete Partnership agreement with DfC. Explore co-opting external experts to Board committees. Work with sponsor department regarding Commissioner recruitment and succession planning 	We will publish information in our annual report governance section on Audit opinions. Reports on internal compliance. Results of staff survey. Compliance with performance management strategy. People Strategy Action Plan Implementation. Progress of policy development agenda. Use of available statutory powers. Number of tribunal and court challenges.
b) reporting reliable information on performance against targets and standards, and on the use of all available statutory powers.	 Monthly and quarterly updates on progress against business plan. Continue to carry out annual assurance checks framework. 	We will publish performance information in our annual report re corporate performance and service information against targets including: Number of website hits.

c) developing the capacity to manage change effectively and identify ongoing improvements to systems and processes	 Continue to avail of opportunities to use shared services and procurement frameworks. Take forward Privacy Impact Assessments as appropriate. 	 Number of engagement events. % Staff absence levels. % budget spend revenue. % budget spend capital. % Creditors' invoices paid within 10 working days. We will publish information in our annual report on Project/programme team work. Feedback from critical friends and users on testing new systems.
d) monitoring and responding to customer needs and satisfaction	 Public communications to include key messages and topics as per annual Communications plan. Assurance checks of service standards. Analyse web usage figures. 	 We will publish performance information in the annual report on Number of complaints received about the Commission. Number of information requests (FoI, DPA, EiR) received and responded to. Feedback from customer surveys on website. Number of stakeholder forum meetings and key issues.
e) undertaking a programme of research, including identifying best practice	 Implement essential elements of year 3 of research strategy. Disseminate findings from research 	We will publish information in our annual report on: Research reports. Website hits on reports. We will publish: Report on safeguarding research
f) identifying and responding to pandemic challenges and opportunities arising from new ways of working	 implement new hybrid working and prepare for office working. Manage secure remote working in line with government guidance to deliver effective service provision. Evaluate impact of remote working on staff and relationships with various stakeholders. Develop appropriate policies to match new 	 We will publish performance information in the annual report on: Potential impact of pandemic on response times to FOIs SARs, complaints Changes in levels of customer contact.

	working patterns.	
g) having a commitment to promoting equality of opportunity and good relations.	 Undertake screening as part of policy development. Gather equality assurance information. Annual training for all staff and Commissioners 	We will publish an annual progress report to ECNI 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.

Resources

The Commission's current source of income is 100% 'Grant in Aid' from the Sponsor Department. The 2022/23 overall allocation is £2,122k comprising a baseline budget of £1,686k plus an additional non-recurrent allocation of £436k

This means inflationary increases in the general cost of goods and services and all inescapable pressures not factored into the baseline eg Schedule 1 committee costs, staff pay increase, additional pension costs and building security will have to be met from the overall budget amount. While this will be challenging, it should mean resourcing in the form of all current staff (incl fixed-term and agency temps), can be retained to deliver services across the Commission's regulatory remit and progress a range of improvement and development actions under the business plan.

Budget workings are set out in the following table and are subject to discussion and finalisation. These reflect a range of fundamental assumptions:

Commissioner costs	Assumed full complement of seven Commissioners in place for the year with 3% pay increase. Estimate 22/23 additional days Qt1 as approved by sponsor team. Sch 1 based on one commissioner for Registration decisions and 3 Commissioners Meeting for other decisions, to be reviewed mid-year.
Staff Remuneration	The staff numbers based on current staff compliment will be unchanged and structure as in place now including 4 temporary staff and 1 internal secondment. Limited additional provision for temporary staffing cover. NIC increase and pay award assumed in rates. Includes 3% Pay award for 2022 with estimate of rev increase for those eligible, increase in pension& ERs NIC payable.
Staff/Commissioners non-remuneration costs	Continued use of HR Connect with 7% inflation uplift in costs anticipated. Training costs limited to 1% of salary costs (Commissioners and Staff). Limited provision for recruitment costs ($2 \times £5k$).
IT costs	ICT budget static with potential for reduction when new hosting arrangements secured.
Facilities/Premises costs	Rent/Service charge for new accommodation as advised by DfI team based on 2021-22 bills with inflation applied. Rates reflects correction of error in billing by DfI last year figures with inflation applied.
General running costs	Includes NI Direct for call handling (based on actual total call duration by an hourly charge rate).
Programme Costs (excl legal and professional costs)	Additional provision for communications. Membership fees remain unchanged. Increased provision for research costs.

Legal and professional costs	Legal & professional budget includes provision for Opinions 12X£1.5K, SORP Costs £5K,
	£9.3K BC305 strategic enquiries support, Tribunal £7.5Kx2, Forensic Accounting £10K,
	litigation settlement. Comms budget includes publishing, NLA Licence and Press Clippings,
	£35K comms projects, budget for questions in omnibus survey if required.

Payanua Casts	
Revenue Costs	
<u>Commissioner Remuneration</u>	
Commissioners (7)	26,243
Calcad In 4 Consultance and	07.007
Schedule 1 Committee costs	37,087
Sub Total Commissioners Remuneration	63,330
<u>Staff Remuneration</u>	
Agency Staff	197,761
Agency Stan	137,701
Total Permanent Staff Costs	1,414,761
Sub Total Staff Remuneration	1,612,522
Staff/Commissioner non remuneration Costs	, , , , ,
Recruitment (Advertising Costs)	10,700
Travel & Subsistence	1,200
Training inc comms	16,400
Training mic domina	. 0, . 00
Corporate Legal & Professional costs	40,300
Sub Total Staff/Comm'r non remuneration	68,600
IT Costs	
Database Running Costs	44,884
IT Support (IT Assist)	16,944
IT/Information/Accessibility Audit & Assurance	4,480
Sub Total IT Costs	66,308
Facilities/Premises costs	00,000
Rent/Service Charge	42,000
Therry service charge	12,000
Rates	24,096
Security	8,700
Cleaning/Maintenance	13,740
Heat, Light & Electricity	16,080
Sub Total Facilities/Premises costs	104,616
General Running Costs	101,010
Call handling	20,000
Telecoms (Incl Mobiles & Broadband)	13,800
Stationery/IT Consumables	2,400
Postage	2,400
Sub Total General Running Costs	38,600
Programme Delivery Costs	
Logal & Drafassian - L. Francis	407.000
Legal & Professional Fees	107,820
Conference Fees/Residential	2,500
Communications	38,040
Events & Hospitality	1,500
Investigation interviewee Costs	1,241
Minor Equipment	2,500
Membership fees	13,200
Research & Data gathering	5,000
Sub Total Programme Delivery Costs	171,801
TOTAL REVENUE COSTS	2,125,777