

**Minutes of Board Meeting No. 125 held on Monday 23 March 2026  
at Marlborough House, Craigavon.**

**Present:**

Gerard McCurdy, Chief Commissioner (Chair)  
Aoife Hamilton, Deputy Chief Commissioner  
Kieran Donaghy, Charity Commissioner  
Leanne McCullough, Charity Commissioner  
Alan Hunter, Charity Commissioner  
Patricia Kelly, Legal Commissioner

**In Attendance:**

Frances McCandless, Chief Executive  
Punam McGookin, Head of Charity Services  
Rossa Keown, Head of Compliance and Enquiries  
Aubrey McCrory, Head of Corporate Services  
David McGurk, Finance & Admin Officer

**Apologies:**

Hugh McKeag, Charity Commissioner

The meeting commenced at 9.30am.

**1. Minutes of Board Meeting 124, 2 February 2026**

Following discussion, the minutes of the Board Meeting held on 2 February 2026 were agreed, subject to a minor amendment, for publication on the Commission's website, as proposed by Patricia Kelly and seconded by Leanne McCullough. The Board noted the progress of the Action Points from the last meeting.

**AP1: Minutes of Board Meeting No 124, 2 February 2026 to be published on CCNI website.**

**2. Conflicts of Interest**

The Chair asked Board members to declare any conflicts relating to agenda items. Previously declared conflicts of interest by Alan Hunter and Leanne McCullough as members of the Presbyterian Church in Ireland and potential perceived conflicts by Patricia Kelly, Gerard McCurdy and Alan Hunter regarding Féile An Phobail were noted. Leanne McCullough highlighted her potential perceived conflict with DPOANI and Patricia Kelly highlighted her conflict of interest regarding Relatives for Justice, which the Board noted again. The Chair reminded Commissioners of their responsibility to recuse themselves from decision making in relation to any conflict of interests.

**3. Chair's Business, Correspondence and Meetings**

The Chair noted he and the Chief Executive had recently met the Minister and aspects of the discussion including managing the legislative programme and budget were outlined. The Chair encouraged all Commissioners to

participate in the programme of charity visits, if available, and noted that Elaine Armstrong, chair of the Commission's Stakeholder Forum, would join at the conclusion of the meeting for a discussion.

#### **4. Chief Executive's Report**

The Chief Executive introduced her report and highlighted several developments since papers were issued including input to assembly questions and statutory enquiry progress. It was noted that, for the first time since the Commission was established, a balanced budget for the year ahead could not be achieved, based on initial budgetary allocation indications. This created significant new financial risks for the Board and the Accounting Officer in managing the Commission's operations. The Chief Executive acknowledged that a review of data used in a recent research publication had identified the need for further work and that the report will be reissued accordingly once analysis is complete.

#### **5. Policies and Processes**

##### **a. Draft Strategic Plan 2026-29 and Draft Business Plan 2026-27**

The Head of Corporate Services introduced the draft Strategic Plan 2026-29 and draft Business Plan 2026-27, noting the updated approach and key assumptions. These included putting into effect the Department of Finance approved legal team business case, switching a fifth of casework resources to enquiries, reducing Schedule 1 committees, and lack of programme and training budget allocations. Following discussion of the funding challenges and enhanced risks around budget and reputational risks the Board agreed the draft plans will be finalised when the 2026-27 budget is notified by sponsor department. In the meantime, the draft plans were approved for submission to sponsor department, subject to minor amendments, as proposed by Kieran Donaghy and seconded by Aoife Hamilton.

The Board discussed arrangements to best deliver the draft 2026-27 business plan. Given the risks to core service delivery the organisation was facing, it was agreed it was in the best interests of the Commission to proceed to appoint to one of the posts currently under recruitment, as proposed by Kieran Donaghy and seconded by Patricia Kelly. It was agreed to continue the other recruitment process but stay any decision on appointment pending reconsideration of resource budget at the next Board meeting, as proposed by Alan Hunter and seconded by Kieran Donaghy.

**AP2: Draft Strategic Plan 2026-29 and draft Business Plan 2026-27 to be submitted to sponsor department.**

**AP3: Agreed appointment to be made.**

**AP4: Further appointment decision to be considered at next Board meeting.**

##### **b. LAG update and ToR amendments**

The Legal Commissioner introduced the report and gave a summary of proposed changes which were agreed following discussion, as proposed by Patricia Kelly and seconded by Alan Hunter.

**AP5: Updated LAG committee terms of reference to be published.**

**c. Customer Charter**

The Head of Corporate Services introduced the proposed changes to the Customer Charter, and queries were addressed. Following discussion, the Board agreed the updated charter, subject to minor layout amendment, as proposed by Aoife Hamilton and seconded by Kieran Donaghy.

**AP6: Updated Customer Charter to be published.**

**d. CCEW MOU for ICT Services 2026/27**

The Head of Corporate Services introduced the updated Memorandum of Understanding (MOU) for Information Technology Services (ICT) with the Charity Commission for England and Wales (CCEW) which reflected changes in support being provided during 2026-27. A number of queries were discussed before the Board agreed the MOU, subject to minor amendments, as proposed by Aoife Hamilton and seconded by Patricia Kelly.

**AP7: MOU for ICT Services with CCEW for 2026/27 to be signed by CEx.**

**e. Review operation of scheme of delegation and assurance checks**

The Head of Charity Services introduced the report giving a summary of the progress on registration and casework issues. The Board noted progress covering updating manuals, decisions made and assurance checks.

**f. Partnership Agreement compliance**

The Chief Executive introduced the paper noting that compliance with the Partnership Agreement which replaced the previous Management Statement and Financial Memorandum (MSFM) will be monitored on a six-monthly basis. The Chief Executive gave a summary of the Commission's first compliance review of the agreement which the Board noted.

Leanne McCullough left the meeting 10.45am

**g. Legal update**

The Head of Charity Services introduced the paper giving a high-level overview of the progress on legal cases and issues since the last update in December 2025. The Board noted the various progress and, given emerging financial risks, agreed to discuss approach to recovery of costs at the next Board meeting.

**AP8: Discussion on recovery of costs to be held at next Board meeting**

Leanne McCullough rejoined the meeting at 10.55am.

**h. Board self-assessment exercise**

The Board noted that self-assessment scores were high and no actions identified. The Chief Executive highlighted in 2026-27 arrangements for an external assessment would need to be confirmed. Arrangements to be made for a Board 'Away day' in quarter 2 - 2026-27.

**AP9: Arrangements to be made for a Board 'Away day' in Quarter 2.**

**6. Reports from Committees**

In the absence of Hugh McKeag an update on the most recent Audit and Risk Assurance Committee (ARAC) was provided by Leanne McCullough.

**ARAC**

**a. Minutes of ARAC Meeting No 68 – 10 March 2026**

The minutes of the ARAC meeting held on 10 March 2026 were approved for publication, as proposed by Leanne McCullough and seconded by Alan Hunter.

**AP10: Minutes of ARAC No 68 – 10 March 2026 to be published on the website.**

**b. Review ARAC Terms of Reference and meeting schedule**

The proposed changes which were agreed following discussion as proposed by Leanne McCullough and seconded by Alan Hunter.

**AP:11 Updated ARAC Terms of Reference to be implemented.**

**c. Review of Fraud & Bribery policy & assessment**

Commissioners noted the fraud policy review and updating of the bribery assessment for the coming year. The Board adopted these after proposal by Alan Hunter and seconding by Leanne McCullough.

**AP:12 Updated Fraud policy and assessment to be implemented.**

**d. Risk policy review – risk appetite and corporate risk register for 2026/27**

The Head of Corporate Services introduced the paper highlighting minor changes in the policy reflecting ARAC's discussion of the organisation's risk management approach in November 2025 and the Board's subsequent decision on developing risk-based regulation of the sector. Following discussion, the Board agreed the updated risk policy to be implemented as proposed by Alan Hunter and seconded by Leanne McCullough.

The Board also discussed and agreed the updated risk appetite for implementing the draft 2026-27 business plan, as proposed by Leanne McCullough and seconded by Alan Hunter. Following discussion of risk scoring in light of the financial situation, the Board agreed the updated corporate risk register, subject to minor amendments, as proposed by Aoife Hamilton and seconded by Kieran Donaghy.

**AP13: Updated Risk policy, appetite and corporate risk register to be implemented.**

**e. Review of business continuity plan**

The Head of Corporate Services introduced the review paper and highlighted the proposal to include a major incident protocol. Following discussion, the

updated continuity plan was adopted as proposed by Kieran Donaghy and seconded by Aoife Hamilton.

**AP14: Updated Business Continuity Plan to be implemented.**

**f. Internal Audit Plan 2026-27**

The Board noted the initial draft internal audit plan was revised by ARAC at its last meeting to reflect prioritisation of safeguarding in the first assignment. Following discussion, the Internal Audit plan for 2026-27 was adopted after proposal by Alan Hunter and seconding by Leanne McCullough.

**g. Internal Audit 1<sup>st</sup> Assignment Report 2025/26**

The Board noted the first assignment report which included a satisfactory assurance and one priority 3 recommendation, which the Board had addressed under agenda item 5c.

**h. Assurance Statement**

The Chief Executive introduced the assurance statement which had been recommended by ARAC. The Board agreed the submission of the statement as proposed by Kieran Donaghy and seconded by Patricia Kelly.

**AP15: CEx and Chair to sign assurance statement for submission to DfC.**

**Schedule 1 Decisions**

**i. Three Commissioners Committee**

- 5 December 2025 - noted

**7. Corporate Services Report**

The Head of Corporate Services highlighted progress on the office relocation project, development of new online forms and launch of the Commission's new website in February. Details of negotiations and legal advice were outlined. Following discussion, the Board approved the Heads of Terms for the new office accommodation, as proposed by Patricia Kelly and seconded by Aoife Hamilton. After an outline of next steps, the Board agreed to confirm the agreement to lease and lease agreement by correspondence and that these will be signed by the Chief Executive, as proposed by Kieran Donaghy and seconded by Aoife Hamilton.

**AP16: Agreement to lease and lease agreement to be approved by correspondence and signed by the Chief Executive.**

The Head of Corporate Services highlighted implementation of the Commission's Artificial Intelligence (AI) pilot. It was agreed to update the Commission's AI policy to reflect changes in sponsor department's policy and approach, as proposed by Aoife Hamilton and seconded by Patricia Kelly.

**AP17: AI Policy to be updated**

## **8. Charity Services Report**

The Head of Charity Services introduced their report noting various casework progress, trends and details of high-profile cases. Following discussion on the need for an approach to publication of orders made under Section 37 of the Charities Act (NI) 2008, the Board agreed that Section 37 Orders would not be published on the website unless justification to do so, as proposed by Patricia Kelly and seconded by Leanne McCullough.

The Head of Charity Services gave an overview of the operation of the Closures Manual, noting the practice of some charities applying for closure at the start of their considerations which can take time and impact on post closure reporting. Following discussion, the Board approved a minor change to include a withdrawal step in the manual, as proposed by Kieran Donaghy and seconded by Leanne McCullough.

**AP18: Section 37 publications approach to be implemented.**

**AP19: Updated Closures Manual to be implemented.**

## **9. Compliance and Enquiries Report**

The Head of Compliance and Enquiries introduced their report and gave an update on filing compliance rates and current high-profile concerns. The Board noted minor amendments had been made to the monitoring manual to clarify the process. Details were outlined of a request for Commission input to the Financial Action Task Force received from the Treasury, but that CCEW would take the lead on providing responses. Commissioners discussed the shift in compliance focus in 2026-27 to filing defaulters to improve accuracy of the charity register and closures. Notification letters were being issued before the end of March to reflect this work.

## **10. Issues for next meeting**

The Chair noted, in addition to committee business, the following items are likely to be included at the next meeting on 11 May 2026:

- ARAC items – draft annual accounts, assurance statement
- 2025-26 Annual Report draft text
- Communication and Engagement strategy 2026-29
- Policy Development Plan 2026-2029
- Stakeholder Forum update
- Incorporations manual
- Enquiries options paper
- Jurisdiction process for threshold

## **11. AOB**

None

Meeting ended at 12.15pm

The Head of the Stakeholder Forum Elaine Armstrong joined the Board at the end of the meeting.

### Register of Outstanding Action Points

<b>Board Meeting and Action Point Number</b>	<b>Date Raised</b>	<b>Agenda Item</b>	<b>Action</b>	<b>Owners</b>	<b>Status (target)</b>
125(1)	23/03/2026	1	Minutes of Board Meeting No 124, 2 February 2026 to be published on CCNI website.	Comms	Complete
125(2)	23/03/2026	5a	Draft Strategic Plan 2026-29 and draft Business Plan 2026-27 to be submitted to sponsor department.	HCorpS	Complete
125(3)	23/03/2026	5a	Agreed appointment to be made.	HCS	Complete
125(4)	23/03/2026	5a	Further appointment decision to be considered at next Board meeting.	HCS	Ongoing (Q1 26/27)
125(5)	23/03/2026	5b	Updated LAG committee terms of reference to be published.	HCS	Ongoing (Q1 26/27)
125(6)	23/03/2026	5c	Updated Customer Charter to be published.	HCorpS	Complete
125(7)	23/03/2026	5d	MOU for ICT Services with CCEW for 2026/27 to be signed by CEx.	CEx	Complete
125(8)	23/03/2026	5g	Discussion on recovery of costs to be held at next Board meeting	HCS	Ongoing (Q1 26/27)
125(9)	23/03/2026	5h	Arrangements to be made for a Board 'Away day' in Quarter 2.	FAO	Ongoing (Q1 26/27)

125(10)	23/03/2026	6a	Minutes of ARAC No 68 – 10 March 2026 to be published on the website.	Comms	Complete
125(11)	23/03/2026	6b	Updated ARAC Terms of Reference to be implemented.	HCorpS	Complete
125(12)	23/03/2026	6c	Updated Fraud policy and assessment to be implemented.	HCorpS	Complete
125(13)	23/03/2026	6d	Updated Risk policy, appetite and corporate risk register to be implemented.	HCorpS	Complete
125(14)	23/03/2026	6e	Updated Business Continuity Plan to be implemented.	HCorpS	Complete
125(15)	23/03/2026	6h	CEx and Chair to sign assurance statement for submission to DfC.	CEx	Complete
125(16)	23/03/2026	7	Agreement to lease and lease agreement to be approved by correspondence and signed by the Chief Executive.	HCorpS	Ongoing (Q1 26/27)
125(17)	23/03/2026	7	AI Policy to be updated	HCorpS	Complete
125(18)	23/03/2026	8	Section 37 publications approach to be implemented.	HCS	Ongoing (Q1 26/27)
125(19)	23/03/2026	8	Updated Closures Manual to be implemented.	HCS	Ongoing (Q1 26/27)
123(5)	15/12/2025	5c	Records Management Policy and Retention Schedule to be updated in 2026/27.	HCorpS	Ongoing (Q3 26/27)
123(6)	15/12/2025	5d	Updated Registration manual to be implemented.	HCS	Ongoing (Q2 26/27)

122(8)	10/11/2025	5b	Further enhancement of guidance to be discussed with representative groups.	Policy Manager	Ongoing (Q4 25/26)
122(12)	10/11/2025	5d	Consultation report to be finalised for publication pending approval of the finalised strategic plan.	HCorpS	Ongoing (Q4 25/26)
117(4)	03/02/2025	5d	Additional proportionate process to be put in place to identify and address any open amendment clauses relating to registered charities.	HCS	Complete
116(9)	16/12/2024	6c	Staff to be briefed and updated information security to be implemented.	HCorpS	Complete
115(10)	11/11/2024	6b	A review of hybrid working policy to be undertaken following office relocation.	HR Cttee	Ongoing (Q3 26/27)
104(2)	27/03/2023	3	Litigation to be progressed in line with legal advice.	Chair/CE x	Ongoing (26/27)
94 (3)	15/11/21	5a	Corporate Social Responsibility policy to be developed as part of the next strategic planning process.	HCorpS	Complete