

Charity Governance Code



Charity Governance Code survey questions

About the survey

The Charity Governance Code Steering Group is undertaking a consultation about the Code's content, structure, applicability to different sizes of charity, language and accessibility. As part of the consultation process, we are keen to learn about your relationship with the Code, whether as a user or a non-user.

The survey is open to Trustees and charity Chairs, staff working in leadership or governance roles in charities, and a wide range of professionals working in the sector and connected stakeholders.

Completed surveys are confidential and will be reviewed by the Steering Group in a form that is anonymised and seeks to outline patterns and differences in responses. Personal information will only be used to contact you if you indicate (at the end of the survey) that you would like to participate further and offer your contact details.

For users of the Code, the survey has the following sections:

- About you and your organisation
- Using the Code
- Evolving the principles of the Code*
- Outcomes and recommended practice*
- Accessibility of the Code*
- Barriers
- Sustainability of the Code
- General feedback

*Respondents who do not use the Code will not have to respond to these sections.

How to take part

Complete the online survey

The deadline to complete the survey is **11th August 2024**.

We estimate it will take no more than 30 minutes. **There is no option to save responses and return to the survey.** When you start, you'll need to complete it in one sitting. We've included the survey questions below so you can prepare your answers.

When you finish the survey, you must click 'submit' to send us your response.

If you have any technical issues with the survey or questions, contact charitygovernancecode@ncvo.org.uk.

Survey questions

1. Name of your organisation or association- [Association of Church Accountants and Treasurers \(ACAT\)](#)

About you and your organisation

2. Are you responding on behalf of an organisation?
 - [Yes](#)
 - No
3. What best describes the organisation you are representing?
 - [Charity](#)
 - Social enterprise
 - Infrastructure body
 - Other (please specify)
4. What is the annual income of your organisation?
 - Less than £10K
 - £10k-£100k
 - [£100k-£1M](#)
 - £1M-£10M
 - £10M-£100M
 - More than £100M
5. What best describes your role in the organisation you represent?
 - Chair of Trustee Board
 - Trustee
 - Trustee secretary
 - Governance staff lead
 - Independent company secretary
 - CEO
 - Senior Manager (not CEO)
 - [Other \(please specify\)- Director \(Corporate Trustee\)](#)

Using the Code

6. Do you currently use the Charity Governance Code?
 - Yes, we have used the Code in the last year

- Yes, we have used the Code in the last three years
- Yes, we have used the Code but not for over three years
- No

(Non-Users are redirected to question 21)

7. How satisfied are you with the current version of the Charity Governance Code?
 - Very satisfied
 - Somewhat satisfied
 - Somewhat dissatisfied
 - Very dissatisfied
8. The Code is designed as a tool for continuous improvement. To what extent would you describe the principles, outcomes and practice in the Code as stretching?
 - Very stretching
 - Somewhat stretching
 - Somewhat easy
 - Very easy
9. How difficult have you found it to implement the Code?
 - Very difficult
 - Somewhat difficult
 - Manageable
 - Somewhat easy
 - Very easy
10. We want to explore ways of demonstrating the value of the Code. Would your organisation be willing annually to declare whether you use this Code? (e.g. stated in your Annual Report, as part of the return to the Charity Commission, or through your audit)
 - Yes
 - No
 - Don't know
 - Not applicable (as not answering on behalf of an organisation using the Code)

Evolving the principles of the Code

11. How satisfied are you with the content and expectations of the current principles?

	Satisfied	Dissatisfied
Foundation: the trustee role and charity context	YES	

Organisational purpose	YES	
Leadership	YES	
Integrity	NO	
Decision making, risk and control	NO	
Board effectiveness	YES	
Equality, diversity and inclusion	YES	
Openness and accountability	YES	

12. Please share any thoughts you have on how the content, presentation, or structure of the current principles could be improved. ACAT serves almost 17,000 members who hold positions as trustees or finance officers in Christian churches in the UK. From a very recent member survey we found that although 27% of respondents had heard of the Code only 13% had used the current Code. The ACAT Board's view is that although very good in its coverage some member churches, which are predominantly smaller charities, would find it difficult to navigate the requirements of the Code. In respect to each of the elements of the Code we make the following suggestions: Foundation- no comments. Purpose- Consider adding to key outcome 2 the commitment to efficiency & economy. The rationale in our view should focus on assurance in keeping faith with stakeholders, and be linked to recommended practice point 1.5.3, while the fiduciary assurance aspect of maintaining public trust and confidence in the charity. In regard to recommended practice point 1.5- given that the notion of sustainably is taking on a new meaning with sustainability reporting and a focus on three aspects: profit (arguably purpose for charities), people, and planet and this is not what the Code currently means. If it is desired to continue with the term sustainably then consider reframing 1.5.1 to have a broader focus about having a sustainable way of operating with reference to financial resources, people and natural resources. In particular it should speak of the changing needs of society and humanity, not about income sources, and of assessing their impact on the charity's own aims. Leadership - we consider that the Code is phrased in a manner which is too corporate for smaller charities whose trustees administer a charity hands on with few, if any, paid staff. Include the idea of informal leadership that strives for harmony in decision-making over process would be beneficial. Culture is mentioned as an outcome not a focus (key outcome 2.3). In our view ethics should mentioned as having as an outworking of culture and activities under 2.3. (From a Christian viewpoint the ethics of a Church should reflect those of Christ and the call to life-changing discipleship.) Integrity- We welcome the reference to ethics and culture as well

as values here but for smaller charities the Code is too prescriptive. The NCVO's toolkit for micro-charities (<£100k income) greatly simplifies the Code's application via self-testing questions for the Board to consider how compliant it is or isn't and we recommend this as a better model. Decision-making, risk and control- key outcome 4.4- we note that the Board cannot in all cases do everything itself and so must then exercise due control over delegated decision-making. Principle 4 needs more flexibility in application if it is to allow the differentiation matters of leadership in faith matters from that of administrative and operational governance and so we suggest the Code adds a sentence: 'Some charities will need to differentiate in respect of decision-making between matters of interpreting faith, philosophy, or doctrine, where determination of the approach lies elsewhere for example with its faith leadership'. Board effectiveness- The Code's recommended practice for smaller charities differs little from the larger ones but the reality of trustees, who are often also undertaking operational activities as well, is not appreciated and these recommendations are potentially taxing for smaller charities. Equality, diversity and inclusion- a key point here is that the affinity of each trustee with the charity's purpose should inform what is meant by diversity. Openness and accountability- The list of recommended applications to smaller charities is rather lengthy and would be more relevant if this could be tailored (see response to question 16 below).

13. Charities are focused on their purposes, but as organisations they do not operate in a vacuum. An emerging area for charities is how they engage with issues and changing trends in society, as well as navigate contentious debates. Is this something that you would say your charity has experienced?
 - Yes
 - No
 - Not applicable
14. Do you have any thoughts on how the Code could better support boards to navigate these issues? The emphasis through the Code is largely on process in its application guidance but processes in and of themselves cannot deliver effectiveness. Effectiveness is delivered by people and so posing a question on how the Board responds to a matter such as a changing context would be more effective.
15. The following topics have been raised as being relevant for inclusion in the Code. Yet, adding more to the Code increases workload for trustees and staff. For each of the topics below, please could you indicate whether or not in your view the Code needs to go further?

	Yes	No	Don't know
Artificial intelligence (usage and application)	YES		
Boardroom behaviours		No	
Cybersecurity and cyber risk	Yes		
Climate change and environmental issues		No	
Engaging with issues of cultural significance		No	
Financial resilience		No	
Fraud	Yes		
Investments and their management	Yes		
Lobbying and campaigning	Yes		
Political engagement		No	
Risk management		No	
Senior staff pay		No	
Technology and data	Yes		
Trustee succession planning		No	

16. In addition to these topics are there any other omissions to the Code that seem significant to you? Please provide further information. [The Code needs to be suitable for charities of all sizes. Many of ACAT's member churches are smaller and so need to be able to use this effectively. If the Code explicitly permitted it, the tailoring of the Code in this way for smaller charities might best be undertaken by charity umbrella bodies and/ or regulators familiar with that subset of charities, for example faith charities.](#)

Outcomes and recommended practice

17. How clear do you find the Code outcomes and recommended practice in terms of understanding what you need to do to implement the Code?

- [Mostly clear](#)
- Mostly unclear

18. How might the recommended practice be made clearer? *(Please refer to specific areas of the Code where you have examples)* The emphasis of the application guidance is mainly that of process which we think risks a tick box approach. To be transformative we consider it should address instead trustee thinking, behaviours, culture and focus.

Accessibility of the Code

The Code currently has a version for larger charities (over £1 million income), and smaller charities (under £1 million).

19. In your view does this approach work?

- Yes
- No
- Don't know

20. Do you have any comments about the appropriate tailoring of the Code to the different tiers? We consider that the Code would benefit from simplification for smaller charities with income of £250,000 or less (the bulk of the sector). For ACAT, in seeking to represent the views of the majority of its member churches which are predominantly smaller charities, the Code can read like a guide written with larger charities in mind (which can often have a more corporate business culture) which is then largely expected to be similarly applied by smaller charities – which may be unrealistic. A more principles-based approach, as being adopted by the Fundraising Regulator in its Code, without the detailed practice that is recommended (expected) would allow wider use of the Code because smaller charities could tailor more its application to their circumstances. We wondered if it might be better to have open questions focusing on where the trustees of smaller charities work out how to apply the Code's principles; umbrella bodies like ACAT can then develop a tailored approach relevant to our context. We would draw your attention to the very valuable NCVO "Toolkit" for micro-charities which accompanies working with the existing Smaller Charities version of the Code:

<https://www.ncvo.org.uk/help-and-guidance/governance/board-basics/tools-and-guidance/charity-governance-code-guide-for-micro-charities/>

Survey for Non-Users

(This section should only be completed by those who responded 'No' to question 6)

21. What is your level of familiarity with the Charity Governance Code?

- Very familiar
- Somewhat familiar
- I have heard of the Code, not familiar

- No awareness or familiarity
22. Given your familiarity with the Code would you be willing to answer more detailed questions on the content?
- a. Yes
 - b. No

(Respondents answering 'No' will be directed to the next section. Respondents answering yes will be directed to question 7)

Barriers

23. What are the barriers to you using the Code?
- Not aware of its existence
 - Internal staff resistance
 - Internal board resistance
 - Use another Code
 - Resource required
 - The demands of the Code content
 - Relevance of the contents to my organisation
 - No barriers
 - Other (please specify)- survey responses of our members who looked at the Code found the language too formal and aimed at larger charities. There was concern that the version for smaller charities is too long and burdensome with something simpler needed. In our view the application guidance addressed to smaller charities is too detailed and demanding and so needs to be streamlined with a greater appreciation of the practical context of the volunteer small charity boards involved in delivering the charity's work. It also needs to allow flexibility to accommodate faith and faith based practice.
24. What, if anything, would make it easier for your organisation to use the Code?
- A shorter Code
 - Fewer areas of recommended practice
 - An improved and interactive website
 - Greater focus on guidance (e.g. case studies, webinars, blogs, signposting)
 - A version which is more relevant to the size of organisation
 - Not applicable
 - Other (please specify)
25. Whether or not you have used the Code, if you would like to say more about the challenges it poses, please do so. The strong points of the Code are having seven clearly expressed principles that apply to all sizes and types of charity with

an accompanying rationale and outcomes for each one. In the ACAT Board's view the problems lie, particularly for smaller faith charities, in the language the Code uses, the extent to which it is flexible enough to accommodate the language and practice of faith, and its approach to application guidance for smaller charities which is too prescriptive.

Sustainability of the Code

The Code is led by a voluntary steering group of not-for-profit infrastructure bodies. In order to support the development of the Code, this group has to raise money from external sources. To enhance the Code in the future, with an engaging website and tools, the group will need to secure longer term funding.

26. In principle, were you to use the Code in future:

	Yes	No	Don't know
Would you be willing to pay a small fee, based on your organisation's size, to use the Code?		No	
Are you open to the Code group seeking a corporate partner to support the Code?	Yes		
Are you open to professional advisors being charged to use the Code?		No	

27. Do you have any other suggestions on how the Code could be funded? If funding is a problem then there are alternate solutions. Prior to the Code the Charity Commission for England and Wales had free guidance- The Hallmarks of an Effective Charity (CC10). In the Republic of Ireland the Charity Regulator issues a free to use Governance Code: <https://www.charitiesregulator.ie/en/information-for-charities/charities-governance-code> and so perhaps the charity regulator could be asked to take on the Code. Alternatively a pan UK pan Ireland approach to the Code under the auspices of the Charities SORP Committee (given that the Financial Reporting Council issues the Combined Code on Corporate Governance for companies) might be another solution.

General Feedback

28. Please share any other thoughts or reflections in relation to the Code, its ease of use, content, or overall approach. [The ACAT Board supports the idea of excellence in trustee governance which the Code represents. ACAT considers that goodness in trusteeship is consistent with the call on Christians: 'Only let your conduct be worthy of the Gospel of Christ...' \(Philippians 1 verse 27\).](#)

29. Are you happy to take part in any further aspect of the Code consultation process (e.g. taking part in a focus group)?

- Yes
- No

If yes, please enter email address- Nigeldavies.nfp@gmail.com

Please note

The questions in this document are just for reference.

To take part you must [complete the online survey](#).