SUMMARY OF CONSULTATION
12 October 2018
1. **Background**
Since spring 2018, the steering group has worked together alongside 40 charities to develop The Charity Digital Code of Practice (the Code). The project has been funded by The Co-op Foundation and Lloyds Banking Group.

The purpose of the Code is to help charities use digital to increase impact, develop skills and improve sustainability. It aims to make digital more accessible to charities of all sizes, helping them develop their skills and increase their take up of digital activity. In doing so it intends to create a level playing field for all organisations and to make charities more accessible for beneficiaries, as well as to provide new opportunities for funders to engage with digital and enhance collaboration across the sector. The Code sets out principles and best practice for success for large and small charities. The government committed to supporting the development of the Code as part of the Civil Society Strategy.

2. **Methodology for the consultation**
We used both quantitative and qualitative methods for the consultation, comprising:

- An online SurveyMonkey survey, modelled on the format for NCVO's consultation for The Charity Governance Code. The survey included open and closed questions and was designed to be quick and easy for respondents to take.

- Individual responses. These were mainly received via email or phone interviews with recipients.

The online survey was open from 9am on Tuesday 3 July to 9am on Tuesday 25 September 2018. We received 171 responses in total, comprising 160 responses via the survey and 11 others via email and stakeholder interviews.

Quantitative data has been rounded up to the nearest decimal point.

3. **Key themes from responses**
*The biggest challenges facing charities in digital*

To help us understand respondents’ priorities, we asked them to tell us about what they see as the key issues.

60% wanted to increase digital skills at their charity, with 49% stating that they are using digital well but need to take things to the next level. 39% need funding to progress with digital and 36% wanted to know how to manage risk.

Just over a quarter (26%) need their boards to get behind digital, with 16% wanting more support from their leadership team. A quarter of respondents don’t know what to prioritise.

**Support for the Code**

The consultation shows support for the Code, with a wide range of responses on what worked well about the Code and positive feedback about the sector working together on this initiative. There was also good feedback about the principles underpinning the Code and the fact that it included best practice for large and small charities:

"It’s well set out and you can see what is relevant to your size of organisation. It is written for non-techie people and could be shared with non-techie trustees."

"It's a sensible blueprint which works across a broad base whether large or small."
The leadership, user led and skills principles were singled out as being especially relevant. Some respondents said that they were already planning to use the Code, for example in developing trustees’ skills.

These findings echo those of the user testing, which has taken place alongside the Code’s development and involved 40+ charities.

Relevance

We asked respondents if the Code felt relevant to them and feedback was largely positive, with respondents stating that the Code was:

“A structured framework which I could easily use with the Board and the Senior Leadership Team.”

“All 7 of the principles contained elements of things our organisation needs to work on, so the whole Code felt very relevant.”

Some respondents said that there was plenty of useful content in the Code, but it might take a while to implement. This is understandable as the Code is ambitious and aspirational. There was also good feedback about the resources section, which the steering group plan to expand over time.

Resources

Whilst feedback about the Code was generally good, many respondents were keen for resources to help them with implementation. These included how-to guides, case studies, opportunities to learn from peers and assessment tools. The steering group are keen to make the Code digestible for small organisations, given that 97% of charities have a turnover of less than a £1 million. Therefore the steering group plan to develop the resources accompanying the Code, some of which will be made available in time for the launch on 15 November. Funding is currently being sought for Year 2 and if it is secured we plan to create more content and look at where more support can be offered. In addition, we will work with providers of existing assessment tools to encourage them to integrate them with the Code.

Some respondents also requested using a variety of rich media formats to make the Code more accessible, for example a one-page graphic summary and video content. The steering group welcome these ideas and will seek to implement them.

Other ways to make the Code easier to use

Along with the appetite for resources above, respondents mentioned the challenges they were facing in recruiting and developing digital expertise in-house, investing in digital and how to manage the transition to using digital more. The steering group will factor these into their plans for resources.

Barriers to implementation

There was appetite amongst respondents to use the Code with their trustees along with an acknowledgement that boards could be risk averse about digital. Funding for digital was also cited as a challenge. The steering group has already begun and will continue to work with organisations who work closely with trustees as well as funders to encourage them to engage with the Code.
Another response requested clarification from regulators about their expectations, whilst others were keen for the Code to be adopted by charity CEOs and CVS.

Gaps in the Code
Some respondents were keen to see more in the Code about data, developing the right mindset for digital and making the case for investment.

Satisfaction with and clarity of the Code
- 81% of respondents were either very satisfied or somewhat satisfied with the Code
- 82% of respondents said that the Code was either clear or somewhat clear in outlining the standards and how they apply to their organisation
- 79% of respondents will definitely or probably use the Code.

4. Recommendations
Most of the responses focused on what support can be offered around the Code and what it could be used to achieve. With that in mind, we will aim to do the following. Please note that in the period between now and launch on 15 November, we will have to focus on what is actionable within that timeframe. Anything that is not possible in that time will however be included in plans for Year 2 of the Code, once funding is secured.

Generally
- Work with ACEVO and NAVCA to encourage CEOs and CVS to adopt the Code
- Work with the Commission to clarify expectations of charities under the Code
- Examine if we need to add in any further content to the Code about data
- Look at where we can make the Code more challenging for digitally mature organisations
- Clarify the relationship between digital and IT in the Code.

Resources
- Create more resources featuring case studies and statistics of charities doing digital well
- Work with and support organisations who are developing digital self-assessment tools to ensure they are integrated with the Code
- Look at creating simple resources and checklists, e.g. what you can do if you have one hour a day to work on implementing the Code, or 3 things you could do to put the Code into action
- Curate and create resources which could help engage charities further with the Code, e.g. free training as well as content on topics such as how other charities have managed digital change, how do they make decisions and how do they manage risk? How have others changed staff culture? We can also look at content that includes barriers and the pain of transition, buy-in for and investment in digital
- Improve the glossary if required

Making the Code digestible
- Create a one-page graphic summary of the Code
- Look at adding in more visuals, e.g. embedding user generated video content
- Review whether we can create a hosted forum for sharing knowledge, ideas and experiences, if funding can be secured.
**Funders**

Encourage funders to engage with the Code and understand the potential for their own organisations, as well as grantees.

The following are based on feedback about specific principles:

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<th>Principle</th>
<th>Recommendation</th>
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| 1. Leadership      | ● Review governance section, i.e. defining ownership of digital by leaders and responsibilities of trustees  
                      ● Look at role of CEO in the Code and adapt leadership principle accordingly. |
| 2. User led        | ● Look at signposting to more resources to support with the application of this principle  
                      ● Review how to create mindset of innovation, provided this doesn’t duplicate the section on culture  
                      ● Factor in needs of donors where needed  
                      ● Include W3C guidance. |
| 3. Culture         | ● Review content about digital mindset to see if it is sufficient  
                      ● Include reference to flattened structures  
                      ● Source case studies on pro bono partnerships. |
| 4. Strategy        | ● Review this section so that the focus is on an organisational strategy with digital within it, although a digital strategy may be appropriate until the leadership team has developed digital skills  
                      ● Refer to donors under digital inclusion point  
                      ● If appropriate, include guidance on how digital responsibility, leadership and activity can be collaborative and decentralised  
                      ● Expand content on digital mindset if needed. |
| 5. Skills          | ● Review section and define technical and soft skills further, if required. |
| 6. Managing risk and ethics | ● Ensure that this balances risk and ethics as appropriate  
                      ● Refer to ICO guidance under point on data. |
| 7. Adaptability    | ● Develop section further if required  
                      ● Amend to create stronger focus on innovation |
Look at creating accompanying case studies in Year 2 (if funding secured) about the application of future technologies, such as blockchain and AI.
5. Wider sector response to The Charity Digital Code of Practice

Rhodri Davies, Head of Policy at CAF:

“Many charities recognise that technological and digital transformation is no longer something they can ignore - it isn’t a matter of whether to engage, but how. The Charity Digital Code of Practice should provide an invaluable guide in helping organisations to get to grips with what this means for them.

“But we need to recognise that a lot of charities will face barriers - in particular when it comes to attracting and retaining staff with the required level of digital skills. As global competition for tech skills intensifies, charities will have to think creatively about how they respond. If they can offer people the chance to work on interesting, purpose-driven projects - and also taking a lead in adapting to the needs and priorities of the future workplace - they might still be able to compete against companies that offer far higher salaries. If charities do not adapt, however, there is a real risk that we will see a “tech brain drain” from the sector, and a huge opportunity will have been missed.”

Sarah Atkinson, Director of Policy and Communications at the Charity Commission:

“Digital is changing the way the public behave. For charities to stay relevant, increase the difference they can make, and protect their charity from risks, understanding and engaging with the digital world is vital. The enthusiasm with which the charity sector has responded, and the willingness to use the Code and increase digital skills indicated in the responses, is very positive. As regulator, we want to ensure charities have the information and tools they need to succeed and that’s why we are pleased to continue supporting the development of the Code.”

Jamie Ward-Smith, Chair of the Co-op Foundation, co-funder of the Charity Digital Code of Practice:

“Feedback on the Charity Digital Code of Practice has been overwhelmingly positive and we look forward to launching an enhanced guide that will help charities get engaged and take advantage of the huge benefits digital can offer. This will help them to build a more secure future and make an impact where it matters most for their supporters and service users.

“It is clear from our consultation that more funding and resources are needed to ensure charities of all sizes can fully benefit from the Code. I would strongly encourage funders to come together so that we can work cooperatively and help charities thrive in the digital age - the steering group would love to hear from you!”

Lara Burns, Chief Digital & Technology Officer, Age UK:

“As a sector, there is much more we can do to fully embrace the opportunities that digital technology offers and the Charity Digital Code of Practice will provide a welcome structure for this.

“It will give a helpful direction for leadership and governance, and a potential framework for collaborating across the sector and sharing learnings, whilst the resources will provide practical help for delivering programmes.”
“We’re already planning to make use of the Code across Age UK as we develop our ‘BeDigital’ transformation programme, and we hope to use the Code in future to share experiences with others across the sector.”

Clive Gardiner, Head of Digital, NSPCC:

“The Charity Digital Code of Practice will be a hugely helpful, timely and topical resource, offering a robust, constructive framework of issues, tips and checklists that organisations of all sizes can reflect upon and consider. Having been involved since its inception and through iterations and piloting, it’s wonderful to see it come to fruition with such flourish. It will support and complement perfectly the suite of digital strategy initiatives I’m leading at NSPCC this year to ensure that our digital transformation accelerates to match the pace of change in the external world.”

Kevin O’Brien, Director of Finance and Corporate Resources at CLIC Sargent:

“At CLIC Sargent, we are fully embracing digital and have been working hard to implement new ways of working across the organisation with our beneficiaries, supporters, volunteers and staff. The Charity Digital Code is a great framework tool and we will be using this as a key way to measure our effectiveness too. It’s brilliant that this is a free-to-use resource which will help many charities across the sector including CLIC Sargent.”

Martin Campbell, Chief Information Officer at World Vision UK:

“Charities often focus digital thinking on the nuts and bolts of websites and marketing, and can miss the bigger opportunities presented by adopting digital at the heart of the organisation. I’m really pleased that we’ll be able to use the Charity Digital Code of Practice to centre our digital activity around leadership, strategy and, most importantly, culture.”

James Blake, chief executive of YHA (England and Wales):

“Whilst we started YHA’s digital transformation journey some years ago, we’ve still found the Charity Digital Code useful. It’s given us the confidence to push the digital agenda beyond a departmental level, up through to the Executive team and the Board. The Code helps us explain that digital isn’t just something for our Digital department to own, persuading and dragging the rest of the organisation along with it kicking and screaming. Digital is an opportunity for the whole organisation. We already knew this in a sense, but the Charity Digital Code provides the framework and ‘permission’ to continue our journey, to find more funding and allocate more resource and budgets, and accelerate our digital transformation programme with a guiding set of principles to keep us on track. One major shift in our thinking now, is that digital will be a core part of overall charity strategy, as opposed to being something separate in a departmental plan.

The Code helps remind us that it’s the responsibility of all senior staff to own and understand how digital should be a core part of our business planning and decision making, enabling smarter internal processes and efficiencies, and better engagement and solutions for our supporters, members and customers. As part of this, our Head of Digital was recently invited to come along to a Board meeting, helping to put Digital firmly in the minds of our Executive team and Trustees. This allowed us to debate real world examples of future growth opportunities using digital, but also, and arguably more importantly, reminded us that the quality and success of our decisions will often be measured on how well they translate in to digital solutions in future. Understanding digital for decisions makers is therefore critical
moving forward - so that we don't fall in to the trap of saying "that's the decision we've made, now go and make it work on digital".

Scott Woods, Senior Digital Fundraising Manager at The Royal British Legion:

“Firstly, it is really positive to see a serious effort from a wide range of authorities focusing on this specific area. Within the Fundraising department at The Royal British Legion, we are investing in digital and look forward to being able to utilise the finalised Code alongside our strategic direction and risk management documents. We are particularly pleased at how accessible the document is, in terms of language and approach. Structurally, the Code takes a logical pace of defining and detailing the relevant digital landscape for charities, before broadly providing guidance for charities of ‘all sizes, budgets or causes’. The outcome is a palatable and ambitious direction of travel that can be easily appreciated by a broad range of stakeholders. The referrals to relevant supporting works on more niche areas (like cyber security and the Fundraising Code of Practice) work well and will help to ensure the Code stays relevant within a consistently dynamic environment.”

Racheal Jones, Chief Operating Officer at Knowsley CVS:

“We welcome the digital code for our own organisation and for the Social Sector we support within the borough of Knowsley. As a small charity we have recognised the importance of digital platforms to extend our reach, engagement and support and development offer to our local sector. The code provides a clear framework to model aspirations, opportunities and gaps in our organisational approach to embrace digital. The code has enabled us to elevate this to a Board level with a clear framework for our Board to consider, thus embedding our aspirations and approach to embracing digital into our governance. As a result of the code we have refreshed our Social Media Strategy, identified skills gaps and training needs and confidently embedded digital as a core delivery function within our 5 year business plan.”

Kara Lee, Volunteer Centre Manager at Bexley Voluntary Service Council:

“It can be hard for small charities to be able to keep up to date with digital with so many pressures on time and resources, although digital can be so beneficial to continuing their work and sharing what they do with the local community. The code has given us a tool to evaluate how far along our charity is on its digital journey and identify how we could continue to develop digitally to ensure that we are always able to best support our members.”

Kieran Vass, Research Officer at Innovate Trust:

“Innovate Trust enthusiastically supports the Digital Code of Practice and is glad to see it provides a strong foundation for organisations of all sizes in the third sector to build their digital capacity and capital.

“Innovate Trust firmly believes in digitally including some of the most vulnerable people in our society; utilising mainstream technology and it hopes that this new code will help others effectively use technology for charitable purposes.”

Caron Bradshaw, CEO of CFG:

“It is clear to me that in a digital world charities have to also be digital, yet there is a significant proportion of respondents to our consultation who confessed to not seeing the benefit of making their charity digital. As a sector we must make the case to all that in a truly digital world charity must also embrace the benefits that flow from operating digitally and break the assumptions that this is all about creating an app! However I am so heartened by
the level of interest in starting or progressing down the digital road for so many respondents and if the code can help accelerate that journey we will have achieved what we set out to do.”

Excerpt from response from the Fundraising Regulator:

“We welcome the idea of establishing a set of principles to support charities and their governing bodies to enable them to benchmark progress in digital, and to inform decision making in this area.

“We support work undertaken to develop principles to assist charities in making the most of digital. Digital is a constantly evolving field, and it is important that charities are able to make the most of this. Setting a flexible set of principles based on the ‘how’ and ‘why’ will therefore be a valuable resource for charities in the present, whilst remaining adaptable to future developments in digital.

“You reference Section 9 of the Code of Fundraising Practice. As stated in person, we would find it valuable to maintain an open dialogue to ensure that our Code remains relevant and up-to-date, and that the two documents align as far as is practicable.”
1. **What best describes your organisation?**

![Bar Chart showing the distribution of respondents by organisational type.](image)

The majority of respondents (84%) were charities and 4% were social enterprises. The 12% who answered 'other' included consultancies, housing organisations, individuals and a funding body.

2. **What is the annual income of your organisation?**

![Bar Chart showing the distribution of annual income bands.](image)

We have included a breakdown of income bands here as we thought it would be of interest. These responses need to be read alongside the answers to question 2, where 88% of respondents declared themselves to be from charities and social enterprises. Organisations in the £100K-£1 million and £1 million-£10 million were the best represented at 28% and 26% respectively. Those in the £10 million-£100 million income band accounted for 21% of respondents.
3. **What best describes your role (paid or voluntary?)**

Leadership teams and trustees were well represented at 31% and 18% each, accounting for almost half (49%) of respondents in total.

Digital (27%), communications (15%), marketing (14%) and fundraising (12%) were also well represented.

It is surprising that those in IT (7%) and finance (5%) accounted for such a small percentage of respondents. This, alongside the fact that 2% of respondents were from HR, 3% from policy and 3% from service delivery shows that there is more to be done to promote understanding and involvement in digital across all areas of charities.

4. **How satisfied are you with the draft Charity Digital Code of Practice?**

81% are either very or somewhat satisfied with the Code.
5. Does the Code outline the standards clearly and how they apply to your organisation in practice?

The vast majority, i.e. 82%, of respondents said that the Code was either clear or somewhat clear.

6. Would you use The Charity Digital Code of Practice?

79% of respondents will definitely or probably use the Code.