



ENGAGEMENT STRATEGY **2024-27**

1. Introduction

This document succeeds the OSCR 2021–2024 Engagement Strategy. It sets out how OSCR will deliver engagement to support corporate objectives in the 2023–2026 Corporate Strategy, and Regulatory Priorities published in August 2023.

This document sets out what we aim to achieve, how and why we will engage. It will be used in conjunction with a series of individual engagement plans that will set out what we will do to achieve our objectives.

The plan also contains a list of stakeholders with whom OSCR will engage. This list will be amended as engagement programmes are delivered and more stakeholders become engaged in specific aspects of OSCR's work.



Objectives

This document is an overarching engagement strategy that supports the objectives set out in the current Corporate Plan, but OSCR's engagement activity for the next two years will focus primarily upon the implementation of measures contained in the Charities (Regulation and Administration) (Scotland) Act 2023 and the raft of secondary legislation related to that Act that we anticipate will be updated in the next two years.

We will also engage, where appropriate, with key stakeholders in relation to the Scottish Government's Wider Review of charity legislation and regulation, which will be ongoing over the period of this Strategy.

OSCR's data will inform debate on Ministers' Wider Review of charity regulation and legislation. OSCR will play its part as the regulator to inform and advise on that work.

We anticipate further engagement being required for initiatives originating from key stakeholders, such as the Scottish Government's ongoing Public Service Reform.

We anticipate the level of engagement to increase with key stakeholders such as the Scottish Government as its work on public service reform develops. OSCR will respond accordingly.

OSCR will continue to review existing formal relationships with other public bodies, ensuring that new ways of working can be implemented to enhance efficiency in existing processes.

We will feed back to Ministers and the Scottish Parliament on outcomes from the engagement programme relating to the Charities (Regulation and Administration) (Scotland) Act 2023 and the benefits realised in OSCR adopting the powers contained within the Act.

OSCR will continue to make recommendations for further legislative changes based upon the data OSCR holds and our experience of working with approximately 25,000 charities.

All engagement activity undertaken by OSCR will be delivered in accordance with the financial constraints under which the Public Sector currently functions.

This Engagement Strategy will take account of available resources and define how they will be utilised in the most efficient and effective manner. To do this, we will build upon the multi-channel, multi-mode forms of engagement already in use.

In particular, the Engagement Strategy will deliver the following corporate objectives:

We will engage and consult with charities to ensure regulation is as effective as it can be, and to understand its impact.

We will target our engagement with charities using the data we hold, survey results and other feedback to tailor our activities to help charities improve the way they govern themselves.

This Strategy aims to broaden the range of charities with whom OSCR engages, broaden the forms and channels of communication utilised to convey messaging and facilitate engagement, and enhance transparency in how we regulate.


It will make a significant contribution to achieving the following corporate objectives:

We will provide charities with the tools and guidance they need to meet regulatory obligations.

We will deliver smart, responsive, and effective regulation that positively impacts on Scotland's charity sector and its beneficiaries.

2. Principles

OSCR's Corporate Strategy sets out our mission:



The Scottish Charity Regulator will regulate in a way which builds trust and confidence in Scottish charities, holds charities to account and strengthens their ability to positively contribute to society.

This strategy supports our mission statement by working to maintain and enhance the level of trust within the public and those we regulate.

All outcomes from our engagement will be used to inform the implementation of any policies or improvements, to mitigate against the impact of change or risk of increased burden on charities.

We will seek views from all stakeholders and work with all those who wish to contribute to our work.

In delivering all engagement priorities, we will take a human rights and equalities approach, working with key stakeholders to facilitate engagement with all charities, using the most appropriate channels of engagement. This will include:

- translated communication
- working with parent and umbrella charities
- professional bodies
- organisations which have existing channels of communication – particularly with seldom heard charities.

Through this approach we will aim to achieve significant engagement with seldom heard stakeholders in addition to those with whom we have more frequent engagement.

OSCR has engaged with key individuals within, and advisers to, the Scottish Government to understand how we can achieve engagement with all relevant stakeholders.

We will focus individual engagement programmes on delivering the strategic priorities set out in the Corporate Strategy. To do this, we will identify and prioritise our key stakeholders impacted most by these strategic priorities.

Legislation and regulation

The most important engagement priority during the period of this strategy will be for OSCR to engage with charities and representative bodies on the individual measures contained within the Charities (Regulation and Administration) (Scotland) Act 2023. That engagement will ensure full understanding of what will be required by

charities to comply with each measure before implementation. Feedback from charities will be considered to ensure that any potential detrimental impact of each measure is mitigated as much as possible.

Engagement with stakeholders takes place across all teams and levels at OSCR. This strategy recognises this and the importance of maximising outcomes from every form of engagement.

Recognising the financial environment within which OSCR is operating, we will further develop that engagement to ensure that every contact counts. Engagement with any team within OSCR will be joined up to ensure that data collected under one form of engagement will be used to inform all other relevant OSCR workstreams and types of engagement.

OSCR has worked to identify those key stakeholders who will enable us to deliver our engagement programme. They will be invited to participate in delivering the Engagement

Programme to deliver a comprehensive engagement programme.

Qualitative and quantitative data recorded during the delivery of the engagement programme will be analysed with outcomes being used to inform ongoing work in the programme.

Delivery of the Engagement Programme will include an element of dynamism, facilitating a level of flexibility that allows OSCR to respond to ongoing analysis of engagement activity.



It will also require even closer working with the Communications function within OSCR, to raise awareness amongst external stakeholders – to encourage engagement.

For the purposes of this strategy:

- communication is defined as OSCR-led activity that raises awareness amongst external stakeholders – the promotion of information to large audiences.
- engagement is the creation of a dialogue with external stakeholders that facilitates consideration of those views by OSCR in the undertaking of related activity.

3. Drivers

The impact of the COVID-19 pandemic on charities, followed by an economic downturn, is yet to be fully understood. OSCR will utilise data as it becomes available, to inform the nature of future engagement programmes.

OSCR's periodic surveys demonstrate ongoing high levels of trust by the public in charities. They also demonstrate a wish by people in Scotland for enhanced clarity about who makes decisions within individual charities and how charities apply their resources for public benefit. The 2023 Act includes a number of provisions which, once fully commenced, will increase public transparency of charities and accountability of charity trustees. Engagement and communications with key stakeholders will raise awareness of these and all other measures contained in the 2023 Act.

We anticipate a strengthening of public confidence in charities in relation to the levels of transparency

in decision making. This will be measured in the next survey of public trust and confidence which will be undertaken at a point following full implementation, when OSCR anticipates the benefits of the change in regulation will be realised.

OSCR is participating in the review of public services, along with all other public sector bodies. We will continue to engage with all relevant stakeholders to ensure that OSCR delivers the greatest value for money and operates in a financially sustainable manner.

This strategy will work in close conjunction with OSCR's Communications Strategy. Both functions will support each other where required and ensure that any workstream that extends across both functions will be managed through joint working.

The process of close collaboration will be particularly important in utilising feedback from stakeholders to determine areas of OSCR's work where additional communications are required to raise further awareness of the impact of measures in the Act.

We anticipate use of all forms of media, including:

- social media
- OSCR Reporter newsletter and automated emails
- a dedicated section on the OSCR website that will facilitate targeted communication to sub-sectors
- online events for stakeholders to watch at a time and place of their convenience.



Additionally, in using the *Every Contact Counts* principle, information can be given to individual charities when they become engaged by contacting OSCR for information or advice on a related subject. Staff will be able to direct them to

relevant online resources and refer individual charities to the Engagement Team for follow-up.

A key component of the work to support implementation of the measures contained within the Act will be to draft a suite of briefings to enable all OSCR staff to present information when appropriate, and for the benefit of external stakeholders. These briefings will be drafted to resonate with specific audiences.

Engagement will also be used to support OSCR's Business Plan priorities – supporting delivery of work across the organisation.

4. Engagement priorities

Engagement priorities for the period of this strategy are informed by the workstreams contained within the OSCR Corporate Strategy 2023–2026.

Engagement will be prioritised to include stakeholders with an involvement or interest in the workstreams in OSCR's Corporate Strategy, but will also include work to communicate with seldom heard stakeholders. OSCR will seek support from relevant stakeholders to ensure that forms of engagement are appropriate for individual engagement programmes and our stakeholders as a whole.

Use of each channel will be reviewed and revitalised should it require amendment to meet the requirements set out in this document.

OSCR staff speak at a range of external events, providing regulatory updates and sharing relevant public data. We will review the current list of events to ensure whether are an effective use of OSCR resources and whether we can improve this key channel of communication by increasing the number of events at which OSCR participates.

Work has already been undertaken to identify key stakeholders and their potential role in the delivery of OSCR's Corporate Strategy objectives.

These can be categorised as:

- Charities and associated bodies that need to understand the measures contained within the Act and how they will change current ways of working with OSCR
- stakeholders who can act as channels of communication
 - Parent/umbrella charities
 - Organisations with links to, or channels of communication throughout the Sector
 - Professional or representative bodies

- Stakeholders who work with/commission charities
 - Local Authorities
 - Scottish Government
- Stakeholders with an interest in implementation of the Act
 - Scottish Parliament
 - Scottish Government
- OSCR Board and staff



5. Implementation

Engagement on measures in the Act will be managed by a dedicated resource within OSCR, working in close conjunction with implementation teams and engaging with stakeholders by utilising outputs from those teams.

In that engagement OSCR will inform, listen, feedback, and respond. Through this process we will ensure that, as a listening regulator, we will introduce the measures of the Act and mitigate against negative impact upon charities wherever possible. We will also ensure that there will be no unintentional bias against particular sub-sectors within those we regulate, such as exclusion of any individual charities in the process of co-working to create a new regulatory framework that utilises the measures in the Act.

Any change to processes or policies that may have a significant impact upon charities, or other external stakeholders, will be consulted upon either formally or via OSCR's Charities Reference Group.

OSCR will utilise standard processes and tools to deliver all forms of engagement – particularly engagement relating to the Act.

Outputs and outcomes of such engagement will be recorded to enable monitoring and measurement against success measures.

Close working with all relevant teams within OSCR will be continued and developed for any engagement during the period of this strategy.

6. Monitoring delivery, analysis & reporting

Delivery of engagement with external stakeholders will be monitored and reported upon to demonstrate effectiveness of this key function. There is an increased need for OSCR to understand the level of success in engaging with stakeholders on implementation of the Act. We will

need to demonstrate how well we have facilitated preparations within the sector, and how efficiently we have used additional funding from the Scottish Government, provided for these purposes.

Through the use of standard tools OSCR will be able to monitor the outcome of individual meetings and alignment of stakeholders to OSCR's aims, providing us with qualitative and quantitative measures.

OSCR will also undertake periodic analysis of operational data to identify trends and patterns within the engagement that will inform a sector improvement plan to enable OSCR to work with charities in relation to them working more effectively with the regulator.

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