

Attending

Richard Harries, **RH**- Head of Commission
Clare Hammacott, **CH**- Secretariat for the Commission
Claudia Laidlow, **CL**- Electoral Reform Society
Alexander Runswick, **AR**- Unlock Democracy
Jean Goddart, **JG**- Citizens UK
Cara Bevington, **CB**- Bond
Katy Wright, **KW**- Oxfam
Simon Tiller, **ST**- Friends of the Earth
Angela, **A**- National Pensioners Convention

Transcription

RH I think first of all if we could go around the room and hear from you about the kind of campaigning that your organisation or organisations wants to do ahead of elections, irrespective of regulation at this stage. Just what you'd like to do. And if you believe that this is a very important aspect of democracy, which I suspect you do. How do you make a judgement between actually trying to get some change in policy along the lines of your charity and actually supporting, or trying to do down, particular parties or politicians? I think everyone here is aware that there is a line there. I'd like to hear , perhaps, beginning with you there Simon. And we don't have to go around the room, whoever wants to pitch in first, but I'd like to hear from everybody on this one. So we get a picture of the kind of campaigning you would like to do, on the assumption that you regard that as an essential part of your role. How do you make the judgement yourself?

ST Well from Friends of the Earth, there's quite a few. I guess there'd be a selection from things we did at previous elections. I wasn't at Friends of the Earth then but I believe we did a scorecard. Last election, we rated the different parties on their green policies, we did that in conjunction with the Green Alliance. Now previously that wouldn't, with the spending limits and so on, that wouldn't have been caught by the previous legislation. But I believe now if we did it, because of the inclusion of staff costs and so on, we would have to register that activity. So I guess that's just one example of the sort of activities we would have to register with if the legislation went through.

RH Can we try to tease a little bit more out of you from previous election campaigns. I mean you may not be familiar with it if you weren't working. But did Friends of the Earth campaign in individual constituencies, or just overall, in relation to a particular part and did you go into constituencies and look into the particular policies of particular candidates?

ST To be honest I don't know the particular details of that. But I can imagine they do do that

in relation to specific pieces of regulation that I have worked on.

RH But Friends of the Earth are pretty active campaigners and even under the previous limits of £10,000, given the fact they were limited to things like leaflets, I struggle to see how you didn't move into things above the threshold there. But do we have a judgement from the Electoral Commission as to how Friends of the Earth operated and whether they fell in or outside of the previous rules. I don't mean the spending limits or activities, but in terms of actually what they're doing, scoring of particular parties from the point of view that Friends of the Earth. I mean did the Electoral Commission make a judgement about that last time?

AR If I could come in there, because I work for Unlock Democracy and we did a similar activity and I actually had a meeting with the Electoral Commission so it may be that as you weren't there at the time I can probably provide more information. So, for example at the last election we did a similar thing where we published a manifesto of policies that we wanted to see on our issues, which are basically democracy, human rights and civil liberties and political participation. So we published our own manifesto and then we matched the political parties to what we wanted and then gave them a rating. So we've had meetings with the Electoral Commission about this and they deemed under the old rules that that didn't qualify as third party activity because although we were publishing it in a printed format on our website and sending it to our members and supporters. Those people were members and supporters of our organisation and therefore were not deemed to be the public and although we had a website, again, it wasn't something you could accidentally trip over. It was something that you actually had to be looking for that information to be able to find it. So they didn't believe that that qualified as needing us to require us to register. Under new rules, we would be required to register that because they changed the regulation so it's no longer members and supporters, it's merely members. So we can send it to the thousands of members that we have but if I put out an email to the hundreds of thousands of supporters that we have saying oh look we've done this new website, isn't this interesting...that would be third party activity under the new rules, in a way that it wasn't under the old rules. Also the fact that if we were going to print the booklet as we did last time, not even taking staff time into consideration, that would trigger the £5,000 threshold, which under the old £10,000 threshold it didn't. I think that is a very standard, basic level of NGO campaigning in an election. That's a baseline, if you were going to do anything at all, even if you didn't have much resources, that's cognitive think you do before a scorecard. I think that would now meet the regulations.

RH That's very helpful. So what we have there is a very clear distinction between members and the public and now your website counts as part of the public. Rather than, supporters are not included as part of members.

AR Because we have a very large supporter base that will take our campaign actions, that turn up to our events and in many cases actually give us money. But for whatever reason decide they don't formally want to be a member, because they don't want to turn up to AGMs, but for any other reason. But my communication with them would be subject to regulations but with my

formal members wouldn't. And that dramatically reduces the number of people I can speak to

ST The complexity of that is something that people have to grapple with and that, it's quite burdensome. And have to sought of engage with the legislation, as it is, it's so complicated that...

AR The way things have been administratively set up in my organisation, I cannot tell you on my email list who is a member and who is just a supporter. I have a database of my members who I mail and financial information and I have a large email list, but I couldn't at the moment have a way of telling, of knowing a distinction between those two lists.

RH Good, if you haven't got anything else that you want to add to that Simon let's go to Angela and ask from your standpoint.

A Well, I've been part of the National Pensioners Convention for just about a year, so I can't really give you any information about elections but I can tell you from a campaigning point of view that it is always at the forefront and it is the main basis of what we do. They campaign for anything and everything to do with pensioners rights, the big point at the moment is universal benefits, where we are gathering nearly a hundred thousand signatures so that we can have a debate in the house. That covers every sort of benefit, it doesn't mean merely pensioners benefits, it covers prescription, it covers everything. We're taking it forward on the basis that everybody's going to be a pensioner eventually. And if you don't help us protect it now, it will be gone. We campaign for this everywhere all over the UK, vociferously. Within all our affiliates and our pensioners groups, I'm very much a part of that campaign in my own area. That's really as much as I know at the moment.

RH But so far as you know you don't do a scorecard of political parties attitudes to...

A It hasn't come to my knowledge, whether or not there is, there has been such an angle in the past, I wouldn't know. We have one full time member of staff, who works through the head office, who would be able to provide you with that information. But I'm not party to it.

CH That might be something you might want to ask in your written submission.

RH Right thank you very much, Claudia?

CL The Electoral Reform Society has traditionally been an organisation that has promoted changes to the British electoral system and I'm sure most of the people will have been aware of the referendum from a couple of years ago. But since then we have really broadened our remit to lots of democracy issues that we campaign on, the things we've got that are currently on the way, but also planned for next year; the reform of the House of Lords is one of our key issues, the role and future of political parties is a big piece of work that we're researching at the moment and intend to launch next year and the other sort of key issue that we're campaigning on is better local democracy, reforming the local system to make it more democratic and representative for

voters. And what I'm thinking for all of those things in 2014 and in the lead up to the general election in 2015 is our desire to influence political parties manifesto processes and getting our issues adopted into manifestos ultimately and I guess that's one of our concerns is that unintended consequences of the bill may impact adversely on those campaign issues for us and our ability to campaign publicly on those issues. But, we're also a national organisation so we've got an office in Cardiff, in Wales and in Edinburgh, in Scotland, but the issues that those two offices are campaigning on are quite specific to the nations. A bit of Scottish democracy in Scotland, obviously, devolution is something that our office is working very hard on. Our main concern is the much lower thresholds in Scotland and Wales, and the potential for that to impact on the brilliant work that our offices are doing to raise important issues for our democracy. I can't unfortunately give specific examples of campaigns that may be directly affected by this but we're an organisation with fourteen staff across three nations and we do a lot with the money that we have but I think we would be affected by the threshold that is proposed in the Bill.

RH I can imagine. The staff costs for fourteen people over a year, the percentage of it given to this, it would mount up, wouldn't it? If anybody wants to ask anybody who has spoken a clarifying point/ question do, if not, we'll on to Finn.

CH Finn's part of my time, so do you want to comment on this Finn?

Finn I don't think so. I've only had one or two weeks experience, so I think no.

KW He already knows it's a terrible Bill.

Laughter

AR I have some points I'd like to add if I may. I've already talked about the scorecard of what we do. There are two key aspects of Unlock Democracy's work. One is kind of the public policy side. So we have a number of different areas that we campaign on whether it's House of Lords reform, freedom of information, civil liberties, or human rights issues. One of our concerns is that by regulating the year before election, we will be limited in what we can do in terms of working with MPs, working with Parliamentarians in the run up to elections. It's not that we're necessarily trying to influence what's going on in elections but in terms of commenting on public policy. And engaging with public policy debates that that regulatory period may prevent us from doing that. The second part of what we do, in our mission, is about engaging more people in politics, so it's not just that we trying to lobby for specific changes, but we're trying to promote engagement in political processes. So we do that in part getting people to write to their MPS, but also to submit evidence to select committees or consultations, or hold meetings in their constituencies, there are lots of different types of grassroot activities that we try and facilitate that we would be concerned would be threatened by that year long regulatory period. And also the fact that the other side of the things we do in the general election campaign is support people who in constituencies that want to organise hustings meetings. Obviously that's one of the main ways people get involved in the general election, they go along to the meeting to hear all

candidates speak on the different issues. Now, in theory that kind of activity should not be covered by this regulation, but it is far from clear that that is the case and certainly legal advice that I've had suggests that I can't be sure it isn't the case. One of the challenges is that if you're organising hustings meeting and you invite all candidates then that's kind of under-representation of the People Act. If for example an organisation decided that they didn't want to invite the British National Party that then changes the regulatory framework for that meeting. It has to be accounted for all candidates that attract election expenses and that would almost certainly be covered by these regulations. And that's one of the key ways that people up and down this country actually participate in election campaigning, is hearing from political candidates, so I'd be very concerned that that kind of activity would be threatened. A lot of what we do, is obviously as a relatively small national staff team, we can't always organise meetings up and down the country, what we do is support people in those local areas who want to hold those meetings. Already, lots of people back down once they realise that actually there's electoral law and it's a bit difficult. I'm concerned that if it's not just the existing regulatory framework, but a new much more complicated one - that even the Electoral Commission doesn't understand and they're going to be able to create it - that more and more people will simply say 'I'm interested in doing this, but I can't, I'm not willing to take the risk' I think it could have a real chilling impact at a local level. The other side of the hustings that we do is we run an online hustings project called 'Vote Match', which had over 2 million users at the last election, is used internationally in European countries such as Germany and the Netherlands. It increases turnout at elections by about 15% and obviously something that political parties are all very concerned about is decreasing turnouts at elections, but we have a project that we know can help to counter that trend, but it's something that could be covered by this regulatory framework and we could be prevented from doing it. The other point I wanted to make - sorry, I realise I'm talking a lot - is around coalition working, because although we have a large supporter base, in terms of starting, we're a relatively small organisation and a lot of what we do is we work through coalitions. So for example, we have a big project called 'local works team' which is around increasing participation in local democracy and getting councils to agree changes with national government. That has a coalition of over one hundred national organisations, which range from everything from the Campaign for Real Ale, to the Women's Institute, to trade unions, to human rights organisations but that's over a 100 organisations. If I'm being expected as director of Unlock Democracy to report on a weekly basis and be accountable to report on the spending of a hundred other organisations during an election period, that's simply not feasible. I cannot do that and I'm certainly not going to do it if there's a possibility that I could end up with a criminal conviction for getting it wrong. So my concern is that far from bringing transparency to NGO campaigns, what will happen is it will simply break up coalitions - effective coalitions that actually work and deliver outcomes that political parties are supportive of, because of this regulatory frame. There is a lot of debate about 'big society' and increasing participation, but what this bill could do is actually take away from what we are currently able to do.

RH Thank you very much, there are three or four points there that are extremely helpful in clarifying where we are and we've got notes so that will be...we'll have a good record of that. I wonder whether we could tease out a little bit more, not just from you but from anybody else,

issues around hustings because hustings now count as part of the activities that are going towards expense, don't they? But, I mean this affects churches, of course. Most churches, in most areas will get together in order to organise church based hustings. Now, it's not clear, now, whether simply organising that hustings actually counts for electoral purposes. I mean, your feeling is that it does count, is that right?

AR I think the way it's regulated at the moment, there are different regulatory frameworks if you have all candidates that are standing.

RH Yes, so you think if they're all standing it's alright?

AR I think so, but it's – the legal advice I have is that we just don't know. And I know, from experience, that when you have a regulatory framework where people don't know, they will choose not to do the activity to be on the safe side. But, my assumption at the moment is that if all candidates are there it might be ok. But, definitely, if for whatever reason, one or more candidates isn't there, then it'll be covered by these regulations.

RH What of all of this emerges, is that this Bill is a radical departure from just straight forward common sense, isn't it? Common sense says that something churches ought to do is, get all the candidates together to hear them. And if there's ambiguity about even that, something's gone very far wrong. Then, it's Jean.

JG Following on, actually, from that last discussion, the one specific thing we will be doing around the general election is organising national hustings, which we did for the last elections with the leaders of the three main parties and we will be expecting to do this time. I'm not quite sure how many main parties we're going to have, that's slightly dubious at the moment. ~~It~~ that's one national event, but that's quite an expensive national event. Last time we had central hall, and two and a half thousand people and obviously a huge amount of staff time that went into organising it. So, that's a specific event that will take us over registration limit anyway. I think our bigger concern is that everything we do is campaigning and it's quite difficult to distinguish what of those things may be considered to have an electoral impact because they're nearly all things which may be considered to be 'hot potatoes'. We've just launched a campaign on social care, a new campaign on the Living Wage and migrants rights. We campaign on street safety. They're all things that are highly political issues. Although we're not a party political organisation, nevertheless, we tend to end up taking positions which could be interpreted as being those of one political party or another, if somebody was so minded and to have an impact on voters' activity in the election. And because we're engaging very large numbers of people in the activities that we do, this just leaves us in a huge grey area as to how many could be affected. And in a worst reading, almost all of our expenditure would have to be cut down to the £390,000. Which would mean closing down a large chunk of our existence.

RH What is your annual budget?

JG Our anticipated budget for the election is £1.5 million. That's mostly staff costs.

RH Just remind me again, the campaigning organisations, it's name?

JG Citizens UK. We've grown from London Citizens.

RH Yes, so you started in London Citizens.

JG Our biggest organisation is London. We've been growing nationally. We now have organisations up and running in Nottingham, Birmingham, Cardiff. We're working to develop organisations in a number of other cities and certainly we're talking during that election period of operating in ten, maybe, locations - the biggest one being London, still. But that expansion itself could be extremely... The irony being, is that what we're doing is what you're doing. What we're about is engaging people and getting them active on our political issues, though from very definitely not a party political standpoint. It's a social justice standpoint and one where the issues that are campaigned on are generated from our institutions and come up with by the institutions themselves which are faith organisations, trade unions, community organisations, education institutions and they're directing those campaigns. Our objective is to be able to work in a consensual way towards the resolution of major societal problems, rather than in a party political way, but this is going to drag us into that arena - or potentially could do so.

RH Can you remember what happened to Citizens UK under previous elections?

JG I don't know, I'm afraid, I need to check that out in terms of any... I didn't know this session was going to be happening and I'm not very well briefed in terms of...

RH Could you find out?

JG I don't think we've registered

ST I don't remember seeing you on the register list

JG because I don't think we haven't done any activity which would have... Well, there's been the national hustings, but we haven't done any other activity which would have been seen as being to do with party political activity. We do do hustings for the elections as well.

CH As part of the written evidence you should have received an email from [inaudible] so maybe you could...

JG I'll check up on that, but I would be fairly certain that we haven't.

RH Anybody want to ask Jean any clarifying questions out of that? Otherwise come to you

Cara.

CB Hello, so I work here for Bond. Bond is the networking body for 400 international development NGO charities who work around UK, Oxfam one of our members...also many of our members are tiny NGOs with only one or two staff members and all of our members are registered with charity with charity commission follow guidelines one of the things we do is support them with those guidelines. During election years our members will go off and do their own pieces of work, but one of the things that we as Bond do is as a network is bring people together. One of the aspects we are worried about is changing to coalition side of things being changed, one example would be Make Poverty History campaign in an election year just wouldn't be possible with the changes being made. One of the things we are finding out trying to talk to membership right now about the Bill is people finding it quite hard to engage with, since it is quite complex. Something we are quite nervous about going forward, especially timeline we are working to with if it is in place of may next year, we have got massive job with our membership ensuring we are fulfilling the guidelines. When really, what I think's been talked about is, the work that UK Citizens do. There are so many charitable objections, all NGOs, not party political organizations trying to push forward social justice and poverty. Its not around trying to differentiate between two parties, but obviously some of core issues, forty odd years touching various elections, have been the aid issue. An incredibly political issue but at the end of the day is quite core to the work that our members do. In particular we are worried about coalitions aspect impacting the work that my own organisation can do and also worried about trying to make our members understand the legislation.

RH Leaving aside Bond itself for a moment, but the organisations that are represented on you, your body, which would you say are the big campaigning ones that are most likely to be affected by this Bill?

CB In our our last membership survey we did, it's little out of date now, about two years out, out of four hundred members, about Two hundred and twenty odd identified as doing campaigning advocacy influencing work. So it's a big chunk of members, but there's probably about thirty most known, Oxfam is a very obvious one, but there's also Christian Aid, Cathode, Actionaid, BSO... there's really quite a long and diverse list of organisations that in addition to kind of delivering life saving aids project around the world, will be doing kind of lobbying advocacy work in our home country to try and address policies that will ultimately have an impact...

RH I think it would be useful to have on record the exact figures of your polls as to number engaged in campaigning activity, I think you said something like two hundred and twenty out of four hundred, if you could give us an exact figure so we could quote that? Does anyone want to ask any clarifying questions?

CB I am chairing with my colleagues, I'm off to Wells to go to the public meeting happening there to chair it, theres a train, but thank you very much for your time.

CH Thank you very much for your time, talk to you on Monday.

RH Katie?

KW I guess just a point is that we do campaign in the UK, we have a campaigns department, an advocacy team and a media team undertaking all of that stuff. Campaigning and advocacy is seven percent of our programme's spend predominantly. And that's campaigning work that is UK, but also globally focused. We orientate a lot of our campaigns towards multilateral institutions and to the insuring campaigning activities in the global South and other countries as well. But that still leaves us, because of our relative size, as a relatively big campaigning force in the UK, although it's by no means the biggest part of Oxfam's work, which absolutely remains humanitarian support and development work in the field. In terms of the campaigning, we would typically do – using some 2010 examples – I'll sort of rank it in terms of the least likely to come up against this regulation to the most and then maybe have a stab at where I think the line should lie and how we could make a distinction. So, we certainly do some direct work to engage and build relationships and educate candidates and prospective candidates. So at some point next year, I am sure we will write an accessible leaflet about 'what you need to know about development issues' and make that available to candidates. Because it's in our interest that in whatever forum they're in, if they're asked about development they have some form of knowledge and we're starting to ensure a sort of clued up parliament for post-2010, which is in our interest. I don't believe that will be stopped under the next law – that's direct, private engagement with PPCs and indeed with parties about manifestos. I don't think anyone's going to stop us having lobbying meetings about manifestos and going to round tables and that kind of thing. Where it might get a bit grey is if we are putting 'email your candidate' actions, which we did last year, on our website, which ask our supporters to perhaps get in touch with their candidates and suggest some questions they might want to ask candidates. Another area of work going up the campaigning scale is our work in coalition – you've heard me use this example before – on 'ask the climate question', a coalition campaign we were part of, last time and the aim of that campaign was to make climate a big issue in the general election. I think there would have been some broad policy agreements between the organisations, but really it was to raise the status of green issues and climate change and it had a strategy that was both national and constituency based so it did identify, I think, the 15 most marginal constituencies and aimed to focus resources on them in terms of, that's where we'd try and put on local hustings. And that's where we would be sending supporters of all those organisations information that they could have on their house, like hangers on the back of their doors so that when candidates come a-knocking they got some climate questions to ask. And we actually got feedback from candidates that they found that massively useful, because if they're wondering and working out how to appeal to local voters and they see a 'I'm interested in climate change' poster or leaflet. Down goes that voter on a database and they know what sort of information to send them. So we actually had feedback from candidates that this kind of transparency between what the voters care about and what they can offer them was massively helpful. As I said, we ran hustings and the way that we tried to – 'cause, we're always trying to be politically fair and balanced, as we are the whole year round – so the way that we tried to get round the impracticality and undesirability

of inviting, of paying for something big enough to invite every single candidate, is we used what we hoped was an objective test of looking at the polls last time and saying 'we'll invite the people who polled in the top 5 positions no matter what party they are, we will do that and we'll apply that across the board and that's the basis on which we hope to be objective'.

RH Sorry I don't quite understand, could you just unpack what you just said?

KW So we didn't want to say that we're not going to invite certain parties to our hustings, but neither did we want unworkable hustings of lots of people so what we applied was a test that was blind to any sort of desirability of what parties should be there and we just had a cut off point by looking at the results in the 2005 election and then invited the candidates from the parties and then invited the candidates from the parties who were the top 5. So basically the realistic candidates...

RH But new candidates and new parties wouldn't even have got a look in.

K Yer, so we used the party. Oh, yes I see new candidates from new parties. Yes, that's right.

RH So they might have complained?

K Yes, absolutely. Yes, yes. But, that was all in lots of discussion with the Electoral Commission over that. And again, we didn't register, the coalition didn't have to register even though it's spent way over £10,000. The costings were very plainly to be applied to a sort of materials, made available to the public, not events and so on.

RH And you took that to the Commission to get tested, did you?

K Yes there was lots of discussion with the Electoral Commission in 2010 and specifically about ask the question and we didn't register. Then, and one of the reasons I think that that. Well there's two reasons why perhaps that campaign didn't have to register at that time and they would now. Or perhaps even three. I think there's the widened scope of materials so staff time, that's been covered. There's the higher threshold and but also I think that campaign was deliberately, it's tone was to allow candidates to self identify over a very broad area of climate and green issues, it wasn't a yes/no issue. However, we did run a campaign, or we were part of a campaign last time which wasn't intended to be, yes which was in the electoral period, which was the 'Robin Hood tax' campaign for a financial transaction tax. And that was a very clear 'Yes/No', do you support this or do you not and that was a coalition campaign predominantly on line but with events and rallies etc. And that signed up candidates and party leaders too and we got statements from each of the three party leaders about how they felt about a financial transaction tax and we got lots of candidates and MP to identify themselves as champions and that was on the website. I think that that campaign would be something that would be very difficult to run under the new rules. And then, just to make a point, it's been made before, but of

course the other thing we do in an election year is a whole range of work, that in our minds and in planning is completely irrelevant to the election it is simply our work to highlight and to promote the policies that we work on. And of course we do some work and publish some stuff that is available on our website that isn't even relevant to the UK – it's aimed at influencing World Bank policy, or it's aimed at an upcoming UN meeting, but it's there on the public website and that's where it starts to get very...that element of your website being public. So in terms of getting to the nub of what we're trying to achieve and why we don't think it counts as third party campaigning is, I think we're trying to do two things. We're not blind to the fact that the election is happening, clearly, we're running these sort of things that are relevant to the election but what we're trying to do with that, is raise our issues at a time of national debate, which is an election period, not influence the outcome of election. We wouldn't even start trying because it's absolutely ridiculous that we could. So it is not an intent. Our intent is to use this period of national debate to raise our issues. And where we are trying to influence the policies of candidates or parties, because we have no hope of influencing the election, and that's completely against what we should be trying to do as a charity I think the best way to look at it is that we're trying to ensure consensus to ensure the policy areas that we care about because they matter to the people that it's our charitable business to care about, are insured against whatever happens in the election. So we are looking for whoever the next government, or coalition government or whatever, and ideally the opposition as well, to be supportive of our general policy issues, which is a much safer place for us to be than to try some risky game of creating division and hoping that the right side wins. So I think that the line really does lie with this issue of purpose and primary purpose and there should be an ability to distinguish between that and just using issues to have a primary purpose of getting the party elected. And there was some criticism in the Commons of that being a subject test and I can see that opposition, I can see why the Electoral Commission have some concerns but I would make [the point] – firstly, that's more in line with charitable, or a way of looking at charitable purpose and intent. And secondly, I think it's fair to say that our intent is all that we, as charities can control. We cannot control the fact that we come up with an idea so good that political parties of all or none take it and run with it and use it. And they are the political beasts that will try and get some capital with that. We will just be stating what we think needs to happen, and I think that that's where we should be judged on.

RH Good, thank you very much, that's very helpful . Anybody want to tackle Katie on any of the points she was saying? Have we got a record of your discussions with the Electoral Commission last time? Is that on the record?

KW I can try and dig it out. I can certainly get some specific points.

RH I think it's quite useful, just to have it on the record.

KW A nice example of the sorts of things that were troubling them last time and that would definitely be regulated now of the £5000 spend, is a group of child poverty organisations were promoting a campaign that was a figure – I'll check this – it was a figure of what would have to be

invested in under-5s services to eradicate child poverty. And the Electoral Commission were very exercised about the specificity of that figure. I think they would have been more happy if they were just saying 'child poverty's a bad thing' but weren't happy about very specific policy being promoted, because that made the kind of electoral material because if a party picked that up it would be so identifiable, there would be that exact figure. So that's just an incentive to create bad, wishy-washy campaigning rather than put forward an actual workable policy solution.

RH Moving away from your own charity at the moment, as you know, the Government seems to be very worried that the kind of big spending that goes on in America at election time by third party organisations – could come to this country. Do you share that worry at all? Are there big spending organisations and big spending campaigns that you are concerned about?

AR I'm concerned about the role of money in politics. And I think that there are a number of different issues around that. I have to say that as an organisation who have campaigned for 10 years now, the starting point would absolutely not be the voluntary sector. If, bluntly, if you want to influence politics – if you want to buy influence in politics in the United Kingdom, you would not come to a charitable or voluntary sector organisation. You would give money to a political party, because that is where is you can actually a) give large amounts of money and potentially have an influence on the outcome of an election. We've already seen the way that large donors say to either Conservatives or UKIP, depending on what you do in policy X or Y, I will move my money here or there. So do I agree that there is a policy with money in politics, absolutely and I've been working with political parties for 10 years to try and solve that. I don't think this is where the problem is.

RH I think most people would agree with you entirely about that. And a whole discussion could be have about the inadequacies of Part 1 of the Bill, but I think we have to try to take the government's fears seriously about not political parties but about big spending campaigners of one kind or another. And an example that has been given is that man, whose I can't remember if he's put money into either killing badgers or saving them but he's put huge sums of money into one or the other.

CH Yes, I think you're talking about the Brian May and it wasn't specifically badgers, I think this is the example that James mentioned about how Brian May had spent a personal fortune on putting up posters all the way along motorways in order to specifically counter what the Countryside Alliance were saying. Is this the story you were thinking of?

RH It could be that. I didn't know about it. I thought it could be connected to badgers and we get so many emails every day about badgers. But let's just take that one, whether or not it's hypothetical or real. There could be someone who felt very strongly about, let us say, saving badgers and they went into a constituency where the person standing for elections was clearly on the side of the farmers and wanted to cull badgers. And he might want to put a huge amount of money into a campaign in that constituency.

AR That would already be covered by existing regulation. They would have to register as a third party, there would be limits about what they could spend, all their materials would have to have an imprint. I think one of the big problems with this Bill, looking at the policy details that we're all concerned about is that there isn't actually an evidence base about what problem the government is trying to solve. I really think that the rhetoric is around money and politics, but there is no evidence that I've been able to find, certainly none that the government has published that identifies that third party campaigning in the United Kingdom is currently a problem and if that is the problem, why this particular level of spending that they're proposing is the right one. I'm not aware that anyone is suggesting that third party campaigning shouldn't be regulated, but regulated if it is done in a proportional way. But a) I'm not convinced that third party campaigning is the problem, but also there is no academic evidence, no evidence from the Electoral Commission that it is influencing elections at the moment. I think the big thing that actually scares political parties about third party campaigning is the fact it's people. It's when large voluntary sector organisations who have a supporter base mobilise, can get activists into a constituency. Because that's something that obviously political parties used to be able to do and are less able to do now because they're less membership organisations. But there are organisations, for example I know the countryside alliance, I don't know if it was in 2010 or 2005, but did run quite an effective campaign that wasn't about them spending money on advertising, but was about them saying 'these are key seats in the general election and that if you're in the area, go and campaign for this particular candidate who supports us on this issue. And I think that's actually far more of a challenge than Brian May or someone else putting up posters about badgers.

RH Yeah, I'm sure you're right. So let's move over to the issue of thresholds. I would imagine that we all fear that the attempt to reduce the threshold beyond which you have to register from £10,000 to £5000 in England and £5000 and £2000 in the other Nations is much too low. At the least, it ought to revert to where it was before and I imagine that everyone takes.

KW And of course, it was made in the other session the other day it's not just the reduced threshold, if that was as you said, your printing costs, your publishing costs and perhaps your website. It's a reduced threshold with a vastly...

RH I'm going to come onto that, but is there a case for a threshold being higher than it was before? Because that was said some time ago. Cost of living, and all that. But at the very least it ought to revert to

JG There's one area, it's probably a small area as far as we're concerned, I'm sure they got evidence from organisations that specifically campaign on anti-fascist organisations but I was thinking this when you were mentioning on hustings. But we got involved, marginally – particularly in Tower Hamlets, but in one or two other areas – on anti-EDL activity, but also around some anti-fascist stuff which tends to be a coalition activity again. So, in a sense of negative campaigning, which is already covered by but it raises a very big question mark around legislation but the amount of money that anyone else can campaign against them. So I think

there's a question mark there. I don't know how you put it in terms of general legislation, but that's possibly one of the few areas where we got involved in anything that might be considered to be party political.

RH Right.

JG Sorry that's a rather vague comment, but I can sort of see an argument that threshold's are important. Existing thresholds

RH Existing thresholds are a problem. As we all know, is integrally linked to what counts towards it, so would anybody like to express views about what should and should not count towards the cost before you have to register? I mean, we take it for granted that leaflets in a campaign should count towards, is that right?

AR From my point of view, I mean I don't have direct experience of being regulated as a third party campaign, but my perception is that the current framework works reasonably well, in the sense that people understand how it works. There are lots of NGOs that aren't covered by it and are able to express engagement in political processes but it can campaign directly in constituencies are regulated and are happy to be part of that regulatory system. I think that the change obviously at the moment is this issue of staffing costs, which is problematic both from an administrative burden point of view but also an equality of regulation in terms of political parties explicitly exempting from those provisions but the perils are past and the idea that organisations whose purpose is to influence the outcome of elections should be exempted from those provisions, but organisations for which influencing elections. You know campaigning on election is a tiny part of what they do, should be, feels grossly unfair. But I know that there are some charities that feel there are specific problems with the current system as well, in terms of how it works.

RH What are the implications for volunteer time within the new bill. Does anybody got on any thoughts on that?

KW I imagine they're huge, maybe someone could correct me if I'm getting it wrong but I use an example from this year, we were running campaigning stores at all the major festivals and asking people to sign petitions for more aid and a peaceful, non-military solution for Syria, which sounds very nice but there was political differences. You can imagine, in an election year, there would be political differences on both those things and there was on military intervention and we were very clearly on one side and that was, entirely, apart from one professional festivals coordinator, it's obviously a very attractive thing for volunteers to spend a few hours a day and then get to go to Glastonbury for free and that sort of activity was taking place all through the Summer. And I think that would have, on itself hit a threshold, but if volunteer in-kind contributions were...

RH And it would be so difficult to assess, too, wouldn't it?

KW Completely.

AR But also any organisation who runs student societies, for example, who has volunteers, so how you assess how much time the individual students the University has spent – it's impossible to calculate.

RH Now has anybody got any views about the upper threshold of spending, either for the year or for the actual election period. Is that?

JG Again, we don't see what was wrong with the previous figure. And again, it's one of these there's been no evidence released to demonstrate that the existing figures and you say used to be, so we're saying there's no argument for raising it but no explanation whatsoever has been put

RH No explanation has been made for any of these figures. They all seem to have been plucked out of the air, both this time and last time, don't they? Best luck it more or less worked last time but...So what other issues do you think we need to consider, or have we covered most of the ones...Claire, remind us if you think there are other issues which you think... Has anybody got something to say specifically about campaigning in Scotland, Wales and Northern Ireland that they haven't said already? Apart from the lower thresholds of course and that's been mentioned.

CH That's probably been covered off in those specific sessions, so Simon was at the Wales one and I know that we had...Those specific things came up yesterday at the Northern Ireland session, I don't know what the details are because I only saw one of the people who was there for about three minutes this morning but she said it was really good in Northern Ireland and I think there's feedback, for example I heard from the charities, somebody, I can't remember who it was, who basically said that some charities national issues and then there are local specific issues. The issues you're going to have in Cardiff are going to be different from the issues you're going to have here.

CL That's right, we wouldn't write to people in Scotland without factoring in devolution and similarly in Scotland, and I think my colleague who worked for both those offices has given evidence to the Commission as well.

CH Brilliant, fab, good good

AR There's also the issue with devolved administrations, because this will apply to every election, not just general elections, they have obviously an additional tier of elections so the voluntary sectors in those countries, you would have an almost permanent regulatory system. You would never be free of an election period, between general election, local election, devolved elections and European elections. So there's that challenge. And certainly

from a democracy point of view, the impact that this could have on Northern Ireland and political culture we would be very concerned because, obviously, we all know about the polarized nature of politics in Northern Ireland but the voluntary sector over there play a particularly keen role in facilitating those debates and so we would be particularly concerned about the impact of this Bill in Northern Ireland.

CH We will share the results of that, it is literally hot off the press. I will give you examples.

RH Are there other issues, Claire, that you think would be helpful to bring up?

CH No, I basically would give it open floor now. You have the chair of the Commission and I'm not putting any pressure that their future is in your hands.

RH If there's anything else you'd like me to hear.

CH We've been in meetings, week after week, is there anything else that you think, Richard Harries, it would be helpful for him to inform the other commissioners.

KW Just to run to underline the point, I think it would perhaps be a helpful one to make. From what Alex was saying about the perceived threat parties have with their ability to mobilise is declining ours is also declining a little bit, but is holding up much more robustly our levels of trust with the kind of things with the voluntary sector. I think to see that as a threat is a mistake when we, all the examples here that we've given are ways that we are keeping those links open between people and their elected representatives, so that you know. Oxfam is not a democracy building organization, but we've invested a lot of time in explaining to our activists how to engage their parliamentarians. I think the specific example of how helpful candidates found it to identify issues that people were interested in because they can talk to them on that level, you know, to threaten the ability to hold hustings, which surely are a bit of a gift to candidates, in that someone else is willing to pay for and organise you to speak directly to constituents just seems just seems to be shooting themselves in the foot as well.

RH Exactly, exactly. These people might turn up to hustings, they wouldn't turn up to the average party meeting.

JG Exactly. Also we've done presenting people who are concerned about these issues, and we try to work with politics and we have, with politicians of all parties in a constructive way and on the whole we've had a lot of plaudits from mostly in London, but we worked closely with Ken Livingstone, we worked closely with Boris Johnson, we're trying to do that and on the whole they appreciate what we do. And one of the things we're doing is turning out very large numbers of people, for this day and age, both in local for example election hustings, and national ones but also big meetings about things like campaignings in the run up to the elections around some social issues and so on, which have enabled those politicians to be in contact with members of the public, who they would never normally see. And they are

appreciative of that, they tell us they are anyway frightened of the results, but you know. And that's completely counter-productive from that point of view, the Bill.

AR Just to that point, I know a number of MPs who I spoke to when this was going through the House of Commons said that particularly general elections but elections generally were the main time that members of the public actually engage with politics and politicians and a lot of that is facilitated through voluntary sector organisations. The idea that at the one moment when the public is actually thinking about politics you want to try and shut down that conversation is something they were very concerned about.

RH Good, well if there's nothing else fresh, we can... I've got one thing to put back to you and that is; if you could check whether your body has any links with member of the House of Lords and encourage them to put their name down to speak in the Second reading debate next Tuesday. Because many of their Lordships who would normally get engaged with this Bill are very heavily occupied with the Children's Bill and the Care Bill and the number of speakers down for the second reading at the moment is much thinner than it ought to be and the point has been made several times that it's only really if you have a long list of speakers from the second reading debate that the government even begins to take it seriously. So we must, between now and Tuesday try to get more speakers. So, if you have contacts in the House of Lords, if you could communicate to them that we are concerned with the charity and campaigning section of this Bill. Would they kindly speak, however briefly and they will get a briefing of course, on that second reading, because that will then give them more credibility later on if they want to come in on Committee stage or report stage which will be the crucial stage for the amendments.