

Hi Clare,

I thought it would be worth me reiterating a couple of the points that I made on Monday. As a small infrastructure charity, our biggest concern is coalition campaigning. We have a turnover over of under £1m but our membership has a combined turnover somewhere closer to £500m. Any campaign we coordinate with our members is therefore almost certainly going to breach the reporting threshold and may well hit the spending limit. As a principle, we believe that no organisation should be responsible for reporting the spending of another. We tend to play a light touch, coordinating role rather than running top down campaigns (partly because we like to be member led and partly because it is very difficult to dictate the actions of such a diverse membership) and it would be virtually impossible for us as well as extremely time consuming and expensive to keep account of our members' spending under the proposed rules.

Given that the sector is often criticised for not collaborating enough, it also seems perverse to us to punish charities for working together by restricting coalition campaigns to the same spending limit as a single organisation. There are so many shades of grey in collaboration that I cannot see how a coalition campaign can be reasonable defined and maintain that the only clear way to apply a spending limit is to individual organisations. I realise that this opens up loopholes but 1) there will be loopholes with any definition 2) it should be relatively easy to add some additional protections to prevent the most egregious abuses e.g. campaign groups which are majority funded by the same organisation/individual must share the spending limit 3) clarity is the single most important quality that the legislation should have.

On a separate note, we produce a quarterly policy magazine that contains challenging articles from sector leaders, think tanks, MPs etc. This quarter the theme is ecology i.e. the interaction between organisations and their environment. I'm keen to include an article on the hostile political/legal environment that campaigning charities face and wondered whether you or a colleague from the commission might consider writing such a piece for us. I would be happy for it to be a reworked version of an already published article. Ideally, I'm looking for around 1200 words by 20 December.

All the best,
Nick

Nick Davies
Policy Manager