

Q1: What's your organisation called?

NAVCA

Q2: What's your email address (so we can get in touch if we need to)?

barney.mynott@navca.org.uk

Q3: Where in the UK is your organisation based (England, Wales, Scotland, Northern Ireland)?

England

PAGE 2: Third party campaigning

Q4: Do you agree with the Government that there is a perception of 'undue influence' by third parties during election periods? Can you name examples of when you have seen this happen in previous elections?

It is difficult to disagree with whether the Government feels there is a perception that it is a problem. However, perception is different to facts. I think that it would be useful if the Government had produced evidence of where this has happened. The most notable cases (NUS loans campaign, Heathrow runway) the main candidates seem to fall in line and share the same view as campaigners - and the majority of voters they want to represent. This may not be a bad thing.

Q5: Where do you think the line between issue focussed campaigning and campaigning for the electoral success of a party or candidate should fall? Can you name examples? E.g. Should a document setting out what parties or candidates think about a policy issue - but not calling for the electorate to vote for a party or candidate - be caught by regulation?

I think that Charity law is clear that charities can campaign but not be involved in party political campaigning. This does create an odd situation where the legislation could require charities to declare campaigning spend because it is seen to influence an election even though party political campaigning is illegal.

Q6: Which campaigning activities do you think should be regulated? Which do you think should not be regulated? E.g. Do you think staffing costs or opinion polls should be subject to regulation?

Anything explicitly supporting a candidate or party. We are a bit disappointed that this bill is trying to claim all campaigning as party political as if they invented campaigning.

Q7: How do you think appropriate thresholds for registration should be judged? What threshold do you think is appropriate? For info, the Government is currently proposing changing the threshold from £10,000 to £5,000 in England, and from £5,000 to £2,000 in Scotland, Wales and Northern Ireland.

I think that they should stay as they are. It is an easier argument to argue for the status quo rather than raising them.

Q8: How do you think the spending limit for non-party campaigning should be judged? Should there be a limit? What if any cap should there be? E.g. The previous limit was 5% of the political party spending limit. Do you think a proportion of political party limits is an appropriate way to decide? What other ways might there be of deciding?

We don't have a position on this as our interest is mainly smaller organisations who do not have the resources to spend to the maximum individually. Interestingly I worked for a political party when national limits were first introduced and they were always higher than there was money available (ie they were not really limits).

Q9: Do you think non-party campaigning in coalition should be restricted? How do you think non-party campaigners working in coalitions should be regulated?

Campaigning is a natural expression of our humanity and a fundamental right (that sounds a little pompous). I worry about talk of restricting campaigning.

Q10: Do you think that non-party campaigning organisations should be limited on what they can spend in a single constituency? Do you think accounting for spending in individual constituencies is workable?

Restrictions should only be in place if there is an intention to influence elections.

Q11: Do you think that the devolved nations should have different registration thresholds and spending limits to England? How should these be set / determined? NB please specify whether your organisation campaigns in any or all of the devolved nations

We do not work in devolved nations so do not really have a strong view.

Q12: What should the reporting requirements for non-party campaigners be? Where should the balance between transparency and bureaucracy fall?

There needs to be something in place to prevent political parties either setting up front organisations or colluding with organisations to get round spending limits. Campaigning to influence support for a candidate or party should be regulated by having the type of returns as at present. I think that at present this collusion is not a big issue because spending limits for political parties are either not enforced or are possibly fairly unenforceable.

Q13: How long should the regulated period for non-party campaigning be? How should the length of this period be arrived at?

Obviously the short campaign period should be regulated. The longer period is harder - although a bit easier if we stick to fixed terms.

PAGE 3: Any final thoughts?

Q14: Please share any other thoughts your organisation has for the Commission on Civil Society and Democratic Engagement.

I am unsure of what the problem is that they are trying to fix. What evidence is there of third party campaigners 'stealing elections'. Is there an issue with election spend with political parties? Do people feel that elections are unfair?