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Transparency in Lobbying, Non-Party Campaigning and Trade Union Administration Bill

PART II: NON-PARTY CAMPAIGNING AHEAD OF ELECTIONS

A. Information: About the National Pensioners Convention (NPC):

1. The National Pensioners Convention (NPC) is the largest campaigning organisation of pensioners, representing around 1.5m members of affiliated regions and national pensioner organisations (trade union retired members associations and other retired people's associations).
2. We are a non-party political organisation which holds a biennial delegate conference, comprised of delegates from these affiliates to decide policy and TO elect seven officers.
3. Our executive committee and national council is comprised of these seven officers and delegates from the affiliates.
4. Our main policies are:
 - (a) For a basic state pension above the official poverty level
 - (b) For a free National Care Service, linked to the NHS, paid through taxation
 - (c) To maintain non-means-tested universal pensioner benefits
 - (d) Opposition to the privatisation of public services
5. We continuously campaign on these issues and understand that even though these campaigns are not directed at any one particular party or particular candidates (either in support of or in opposition to them) we will need to register the NPC for our activities during election campaigns.
6. We hold an annual Pensioners' Parliament, which is a non-elected advisory body attended by around 1,000 of our volunteers (members) from around the country.

B. Questions: If the Bill is carried in its present form:

1. Will the expenditure of our affiliates be counted as part of our national election expenditure? And/or
2. Will these affiliates be expected to register in their own right?
3. Will expenditure on our Executive Committee, National Council, biennial dele-

gate conference (BDC) and/or our Pensioners' Parliament be included in the election expenditure?

4. If so, does it include the expenses of those attending, e.g. fares and accommodation?

5. What other information will be included in the returns, e.g. overheads, salaries, expenses for delegates to meetings?

6. If materials are produced for the information of members themselves, but then find themselves in the public domain, will they be counted in expenditure?

7. Will the Registrar require a membership register from us, and if so would this be a list of affiliates, and/or also a list of the membership of these affiliates?

8. Our regions have local borough affiliates. Will the campaign expenses of such local affiliates have to be included in NPC expenditure?

9. If we circulate a questionnaire to candidates (e.g. about whether they support our Pensioners' Charter or not) and then publish the results, will this be seen as support for those candidates who endorse the Charter, and therefore. . . .

10. If our campaigning is deemed to support a particular party and/or candidate will that party and/or candidate be required to include the cost of our campaigning in their election expenses?

C. Comments: the problems for us if the Bill is carried in its present form

The NPC is not a wealthy organisation and, with an annual turnover of only around £180,000 we have only a small office with one full-time and three part-time staff members. It would therefore be extremely difficult for us to produce complex information for the Registrar.

For instance, if we were called upon to include in the returns a list of all the members of our affiliates and up-date this list on each return, it would be very difficult indeed for us, and this would also be the case if we were called upon to include the expenses of all those attending our regular national council and executive committee meetings, our biennial delegate conference and Pensioners' Parliament.

It could be that, despite our determination to represent the interests of pensioners, especially during election campaigns, our national officers and national council will consider this to present so many problems and be such an onerous extra duty on the part of our staff that it would be best to withdraw from campaigning during such election campaigns, for we know that the Registrar can take legal action against organisations which are late with returns etc.

Should this be the outcome of legislation, we would consider it to be an attack on our fundamental democratic rights.