

## Wales Evidence Session: Wednesday 27th November

|                      |   |
|----------------------|---|
| OG Owain Gareth      | Electoral Reform Society                        |
| AL Anna Lewis        | WCVA  |
| RD Rhian Davies      | Disability Wales                                |
| LT Liam Townsend     | Community Housing Cymru                         |
| HE Haf Elgar         | Friends of the Earth Wales                      |
| CH Claire Hammacott  | Commission on Civil Society                     |
| CO Christine O'Byrne | Chwarae Teg and Fair Play                       |
| TP Toni Pearce       | President, NUS                                  |
| PJ Peter Jones       | Guide Dogs Cymru                                |
| AH Aaron Hill        | Community Housing Cymru                         |
| HP Hannah Pudner     | NUS, Wales                                      |
| BW Bryony Walker     | Commission on Civil Society                     |
| GB George Bangham    | ACEVO   |
| RC Rhian Connick     | National Federation of Women's Institute, Wales |
| RT Raymond Thomas    | National Pensioners Convention                  |

CH A couple of housekeeping type things, firstly, we are going to be recording this session, so again that's just because we had so many great points from the last round of evidence sessions, which we could then use as quotes to go into the report, so as a courtesy, I feel it's important to tell you that.

As such, if you are speaking, if you could also say your name, that would also be very helpful, when we're trying to work out who said which piece, and again, we can come back to clarify, but it just makes things simpler for us.

The idea that we thought we would have two parts to this meeting, the first part is for a bit of an update. Where are we, where is the [unclear] Bill at the moment? Where are we at the moment, what's the commission being doing, so I think George can cover most of that off, and then I will add some bits.

We also then would like to get a sense from you, before we start on the actual evidence and questions, around what you've been hearing, what communications you've had, who you've met with, what information can you bring back to this group, in order for us to share that with all the staff, so I hope that will be useful.

Then, the second part of it is, we have some questions, we've ten questions that we want to work our way through with you. She's arrived, early. Toni, come in and join the meeting.

So, Toni will go through the questions, and she will then really use that as an opportunity for

getting your thoughts, your input in the second report. The purpose of the second report being really to take proper, hard evidence and case studies. The first report was more to say, this Bill doesn't work as it stands, and the second report is now to say, based on actual evidence that we've taken from people on the ground, and different organisations and stakeholders, these are the recommendations of which we feel, either amendments can be made, or that there needs to be more time taken, but reasonably something tangible that to see where the challenges are still to be, and what the proposed additions are.

So, before I ask Toni to introduce herself, does that broadly make sense with everybody, and is everybody comfortable with that?

[Agreement yes]

CH Good.

TP Hi, sorry I'm slightly late, and I am Toni, I'm the President of the National Student Union. I am a commissioner on the Commission for Civil Society and Democratic Engagement, and I suppose that the reason NUS has a role in this commission is because of the impact that this Bill potentially has on both us as an organisation, but also our members, as student unions, because they're all charities. There's about 600 student unions affected by this, in our membership, so that's some background of in fact why the NUS is involved.

Have you done the introductions?

CH We have done the introductions. I think it would be really useful for Toni to know who you are, and what your background is, so again, if you can make sure you lean forward, so you can be... can you see yourselves?

OG Yes, we can see ourselves too.

CH Good, okay, so we'll then know whether we can see you or not. Right, Brian, do you want to start and move around?

BW I'm Bryony, I'm working on the commission.

CO I'm Christine O'Byrne, I am the policy manager for a charity called Chwarae Teg. We are a Welsh government funded charity, that helps women to achieve and prosper, and I'm also a trustee of the Welsh Women's Equality Network in Wales.

RC Hello, I'm Rhian Connick, from the National Federation of Women's Institute, Wales office.

PJ Hi, I'm Peter Jones, Wales policy officer for Guide Dogs Cymru.

HP Hi Toni, it's Anne here, from the NUS office.

TP Yes.

RT I'm Raymond Thomas from the National Pensions Convention in Wales.

LT I am Liam Townsend, Political Assistant from Community Housing in Cymru.

AH Aaron Hill, I'm policy officer for Community Housing in Cymru.

OG Owain Gareth, campaigns research officer for Electoral Reform Society, Wales.

AL Anna Lewis, legal services consultant for WCVA.

RD Rhian Davies, Chief Executive of Disability Wales.

HE Haf Elgar, Friends of the Earth.

GB George Bangham, I'm a policy officer at ACEVO, the charity leader's network.

TP Thank you. The other thing to mention is that there will be somebody else joining us here shortly from NUS as well, and he's a member of support staff for NUS, so if you see somebody walking into the room, that's who it will be.

Okay, so I would just check, have we done an introduction as to where we are?

CH We are at the beginning, so we should kick off with that.

TP Brilliant.

CH Over to you, George.

GB Okay. I've been working quite closely with the supporting organisations of the commission, so what I'll do is give a quick update on the work we've done since the first report was published, that was in October. Since then, obviously the government in the House of Lords offered a six week pause in the progress of the bill, and we're worryingly far through that already.

So, the commission immediately decided that it would be necessary to do this second report, and we're at the evidence gathering phase at the moment, as Claire said. The timescale from now is that the second report of the commission will be published on the 10<sup>th</sup> December, so that's a week on Tuesday. We're planning a day of action around Westminster then, which will involve the report launch, and it will be presented to the Chief Executives of some voluntary organisations, and then we'll have a separate presentation to the House of Lords, in one of the

committee rooms, and we're also going to try and have some other drop in sessions, for parliamentarians to come and meet members of civil society organisations, and just normal people as well, and we're also going to try and have some sort of a lobby, possibly outside parliament, and hopefully even something in Downing Street, because the main political objective is not only to have pressure on people in the House of Lords, before the committee stage debates on the 16<sup>th</sup> and 18<sup>th</sup> December, but also to have pressure on at Cabinet level, because Andrew Lansley is the Minister of the Bill, but it was very much conceived by Nick Clegg and David Cameron, we gather.

So, if there's to be political space for a really substantive U turn at this stage, the commissions feel that pressure will need to go up to the top, so the petition that 38 Degrees have organised will be critical in that. We've got close to a quarter of a million signatures so far, so please do circulate to your supporters, and so that's basically the picture for the second report so far.

We're taking the evidence at the moment, the commissioners will be writing and signing it off by middle of next week, and then the launch will be on Tuesday 10<sup>th</sup>, so in terms of what the second report is going to try and do, as Claire said, the first report was an explanation of problems with the bill. The second report is really, is proposing what the commissioners feel ought to be rewritten in the bill, although we're not going to go as far as actually proposing detailed amendments.

That will be done, liaising with cross benchers, with the opposition and other peers, and that will happen after the report's been published, very likely, although of course we're already thinking of what those amendments would be.

So, we're going to be taking the main feeds from the first report, so it's about six or seven areas, starting with the definition of non-party campaigning, so the gateway clause into part two of the bill, and then going through spending thresholds for registration with the electoral commission, national spending caps, constituency limits, etc, and for each of those, we've compiled a list of the evidence we'd like to try and gather, and on which to make our decision, and then the commissioners will propose what they feel, what they recommend should be changed in the bill, and then they will assess how that might be implemented, and whether it's feasible to do it, well, to draft an amendment to that effect, in the next few weeks, or else, whether they feel they ought to be reviewed later on, after the bill has been passed, or whether they simply feel that we're too constrained for time, and should call for another pause.

So, we're not going to...the commissioners won't be decided some of those things now, because it's important to get the report published, but the political pressure will be very strong, and of course, if we go through committee stage in the laws, and it's still not satisfactory, we'll have to reconsider and work out what happens next.

Anything I've missed?

CH No, I don't think so, that broadly made sense, and just before I hand over to Toni, to go through the consultation questions, I just wanted to open to the room, to say is there anything that you heard or any information that you've received from talking to either ministers, or other organisations, that you feel could add to that political update? It may be that you don't but I just wanted to give you space to comment, if you'd like to?

Fabulous, so Toni, we've asked everybody when they're speaking, to say their name, because we are recording this session, and so I think that will then help, but really if I can ask you, if you don't know the answers to the questions that Toni is reading, as I said at the London evidence session on Monday, it's perfectly acceptable for you to all agree that you don't understand it, if it's not clear, if you don't have an answer. That is evidence in itself, so this is not some sort of test, where I'm judging what you do or don't know about it. I'm genuinely looking for your perspective, your experience, your concerns, and they can be personal or on behalf of the group, but if we methodically work our way through it, so if everybody is comfortable with that, I will hand over to Toni.

TP Excellent, thank you. I think the best place to start is probably the first question, which is usually helpful, so I guess to what extent you agree with the government, that there is a perception of undue influence by third parties, during election periods. That's something that I think is the background to this bill, and so I'll be interested to know whether you would agree that there is an undue influence from third parties?

AL Anna speaking. My interpretation of that is actually that there can well be some instances of that, [unclear] but it's generally not by community groups or charities or third sector organisations, and this is actually a sledgehammer approach to a problem, that may well exist, but a sledgehammer that they've put forward is not the correct solution.

RD[?] You see, I think, for me, in that question, it's undue influence on what? So, I think there is evidence of undue influence on policy, that's led to very positive change. I believe the children's commission in Wales came about really campaigning before an election. You may know more about it than me, because I wasn't involved myself but that's what I've heard.

RT I think the, it's about the relationship of bodies, parliament anymore around the general election, during the election, but actually it's opened up a Pandora's box, because it's not recognising how civil society works, and all these changes, if you take historically from particularly the charities' [?] time through to present day, you had the civil groups putting pressure on, the issues coming up in parliament, and being thrown out at different times.

If we look at 1945 election in particular, after the last War, where you had agreement from the major parties, but there was a major question of policy, and what happened was that civil groups campaigning for different issues threw out candidates in the election, and that... some of them were voted in, against these other parties, so what does that mean?

What does that mean, if this bill goes through, in rigid form, what it's going to do is tie down civil influence during elections, from campaigning groups, and that really raises political questions for the future, because civil organisations who were not political, could then turn political, and it is an issue, it can raise a major issue across society in the future.

I don't think that Westminster has really thought out, really what they are doing in what the process of the bill that they talk about.

TP Thank you, I suppose what we're already up for is if there are examples that people have from previous elections and whether those you think are positive or negative influences on the outcome of an election, or on policy, past or committee phases during an election, would be particularly helpful and specifically from your point of view, of Wales?

RD An example from the Disability Wales is we ran a campaign called Independent Living Now, and we were calling for a strategy approach, cost cutting approach to achieving independent living for disabled people in Wales, so just before the election, as a result of our engagement, we produced a manifesto for independent living, and we had a cross party launch of the manifesto, to all four parties in Wales, that were represented and spoke at that, and we also used the Assembly's petition process, to petition for our campaign as well, and we got a lot of signatures for that, and so those kind of... plus, the parliamentary joint committee on human rights also was doing an enquiry into independent living in the UK, particularly in the devolved nations, so all of those things, our campaign, the petition, the human rights enquiry, the election, the Assembly election, all came together, and the Welsh government committed to introducing a framework for action on independent living, which was launched last September.

So, I think that's been an example, where you use a number of processes, to bring about something which we hope will have major impact on the 23% of the population of Wales who are disabled people.

As part of that process, we also, to tell you about our manifesto, we went around party conferences, we did fringe events, and we spoke to the political candidates and policy makers, and I think it's that two way relationship, because what concerns me here, is political parties often approach you, or approach organisations to attend roundtable events, to input into developing their own manifestos, and also they're quite keen to get many of us to attend their party conferences, paper print events, so is all that going to stop then as well?

Where is there going to be that exchange of ideas between civil society and the third sector, and political processes.

I just thought the big issue is these professional lobbyists, that lobby on behalf of huge corporations. I would have thought that was the issue, not voluntary organisations, who get their funds maybe from grants or from people just fundraising, to support their cause, and I think it should be all transparent and accountable, what you're doing, but I think the point was made, it's

using a sledgehammer to crack a nut, but I don't think the problem is with us. I think there might be problems elsewhere, but not with us.

TP That's really helpful, thank you.

OG Owen [unclear] we haven't come across any particular issues here, and we're the sort of organisation which would be looking out for things of this sort. I know that we are quite a small organisation and so we can police everything. I know I've seen some MPs and former MPs on Hansard saying they have examples of people campaigning against them, which cost them the election, and that sort of thing, sort of anecdotes like this, but I think your first report, that there was no public feeling of any problems with our particular sector, and I think the issue is that I cannot say that there is no evidence of anything, but there is no evidence base for this, and I think that that problem is exactly the lack of consultation, the lack of any idea of where the problems are, that they're trying to solve here, and I think that that's basically the problem in the whole process.

It means that we don't know what the problems are that we're trying to solve, so where with the lobbying part of the bill, you can tell there was clearly an issue that is supposedly being addressed, and we can measure the bill as to whether or not it does that. I won't mention which way I'm going with that, but with this, I don't really see that there's a clear problem that isn't hypothetical, that's being addressed.

TP Thank you.

HE Yes, just... from [unclear], I think if we just look at the issue of influence by the sector in Wales during election periods, then there are numerous examples. The Children's Commissioner, as you mentioned, the annual targets to cut gas emissions 3% came about as a result of a campaign by [unclear] coalition before the 2008 election, I believe.

But, it's the word undue in the sentence that's suggested it's a negative an inappropriate thing, and I think that's where we differ from the government on this proposal.

TP Thank you, that's really helpful. I suppose, following on from that, there's a question about how we define the difference between issue based campaigning and campaigning for or against the electoral, party or candidate, and where that line is.

I would be interested to know from your perspective where you think that line should fall, and if you can name examples specifically, that would be really helpful, or when does an issues based campaign become campaigning for or against a candidate or a party, and how can you define that?

RT You've got a problem.

[Overtalking]

Campaigning for specific issues, during all elections, each can be the forum, with all parties in the election, from the Independent Party in Wales, whether it's at Assembly level or whether it's Westminster, no matter what election it is, and then we have questions, and the electorate put questions to the floor, and inevitably with a situation, some of these questions are in line with a particular party's policy.

That line that you say there, somebody else, [unclear] legislation for a candidate then to challenge a candidate who is standing in opposition, who happens to line up with a particular policy that that organisation is in fact supporting, so you are then in this situation that the challenge of the situation where it's going to be difficult to know what is political argument between the parties as such.

LT I think we find ourselves [unclear] situation as well, where something we've been campaigning for years gets picked up by a political party in its manifesto, and suddenly we've got to stop campaigning for it, and we can't raise that, or we'll be seen as backing that candidate or a party, and I think that's one of the real issues with this, as it stands.

HE Yes, I'd say that the line is, there's backing for a candidate for asking supporters, voters, whoever to vote for a party, I'd say that we do things like assess party manifestos, the media asks us for response, which we can do on the basis of facts and comparing manifestos to our campaigns or policy, and that is all appropriate, but the line that we wouldn't cross was to say, and therefore you should vote for... X or Y or you should support this party.

TP Do you agree, sorry Annie?

HP I have a question linked to this, and I'm not sure if [unclear] question recently, but what if the same party is in power in Cardiff and Westminster and it's near the Westminster election, what can we do in Cardiff with our politicians, on issues that may affect the Westminster elections?

OG Owen again, I just wanted to change the last question I had. I haven't read the whole bill, because there's no way I could understand it. I'm not a lawyer, but the expanded notes, notes that it deals only with reserved matters and that's the lobbying part and the part of the bill and reserve matters is going to be contested anyway, and it's government in Northern Ireland, we can speak about health and education in Wales presumably, but of course, actually in Wales, we don't have reserve matters per se, because we are now having the sub commission on devolution, which is looking at the boundary between the non-devolved and devolved, because at the moment there is a massive blur there.

I can give you an example from something we directly look at, which is we campaign for the single transferrable vote anywhere basically in the office, but we campaigned at local government in particular. Now, with the Government of Wales Act as it stands, there are matters



that have been referred to Wales, to the National Assembly, and they are matters that are essentially reserved. The STV [?] local government is not included in the conferred part and it's not included in the reserve part, which means it's what some would call a ghost matter, so nobody actually knows that it's devolved on that, because STV is an issue which we campaign for, which is generally linked with particular parties, two parties in Wales, I guess, but we're not only looking at mixing up the policy and [unclear].

We don't campaign for a particular party, and we have members and supporters from each of the parties, and even if they disagree with official party policy, but we also have a problem here, in that the policies and issues are not clear, whether they're Westminster or devolved. I don't understand how that works in the context of voters in the Assembly election and Westminster election.

HP I've got another example, actually.

TP Annie.

HP Tuition fees, education, tuition fees matters are an issue for the Cardiff government, but obviously the decision is a Westminster government, but Welsh MPs can vote on those issues, so where is the line in that one?

TP Interesting question. Yes, I think from our perspective, that's a question we should be asking the parliamentary commission, and government that this has not been, I don't think that's a question that's been even thought about, let alone answered.

CH If I have to jump in here, part of what we're trying to do in this second report is to get specific case studies about examples, exactly like that, Hannah and what we will go is we'll go and get legal advice, to see what our legal team think is doable, and that's a brilliant type of question that we would need to ask the electoral commission and the charity commission, with whom we have a meeting tomorrow. Whether they'll be prepared to answer it on the spot, I don't know.

I'm not sure I'd want to embarrass them without giving prior warning, but that's exactly the sort of thing, when I sent out the email saying, can you bring evidence, even if you send me a one line, just saying, this is a scenario that we don't have an answer to, can you get clarity for these? And, I will go away and see what I can do for you, so thank you, really useful. All examples like that, so please do share, and if you've got more stuff that you'd like to share, let us know.

CH Can I interject with something, Toni, before you move on, sorry. Just from the point of view of writing the second report, the scenario that we're really trying to find here is, if someone comes in with a million pounds to spend and they wish to use that to try and influence an election, the obvious thing would be to invest in a political party, but what we're trying to work out is if they choose to spend that million pounds on an NGO instead, hoping that that NGO would be a vehicle to try and influence politics, the question is, how would we draw some sort of a

definition around that NGOs activities, that clearly would be undue influence, if the NGO were then to use that money to try and influence the election, but it would be a great challenge to try and define what that NGO would then do with the money, what would be a legitimate use of it or not. It's a difficult thing to explain, but it's a question of how the money is used really.

TP Sorry?

HE It's really...I think there is a lack of clarity here around the definition, isn't it, as it stands.

TP Yes, and I suppose that that's the... sorry, I can't remember who said it, but the difference is that everything is [unclear] but not including telling people who to vote for and which party, and I suppose it would be interesting to note if there were people in the room who disagree with that.

RT What's concerning me are in a sense of the bill, is that during the election period, that is the period in which actually you try and get the [unclear] election, and I think historically there's no evidence of it. In fact, it can take a number of years for opinion in society to build up, to bring about change, and it seems to me, [unclear] it all builds up and somehow the civil society [unclear] to try to influence policy, but the fact of the matter is that to a large degree, if you go to Westminster on the bills that have gone through, it's gone through after a long period of years of campaigning by civil organisations. [Unclear]

A lot of the major bills that really changed society came about from years of campaigning in the 30s, by people for these changes, and that is considered, only what we talked about is to be totally wrong, is that he's trying to...but it's misconceived, totally misconceived, trying to pin down the interpretation [unclear] society in the last, is actually determined and can really influence the changes that take place.

TP Thank you, the next area that leads on from that quite helpfully is are there specific activities that you think ought to be motivated or not to be motivated? So, examples are the cost of staff around campaigns, is that something which should be included in the regulation, things like paying for opinion polls, are they things that should be regulated, and what sort of activities, campaigning activities do you think should be regulated by a bill like this, if any?

GB Toni, can I just add to that, also what should be regulated compared to political parties? Should we have the same or should we have different regulation?

RD Is there an issue around, Disability Wales gets funding from Welsh government, and we are a campaigning organisation, but we also have separate funds, perhaps we've had some legacies or whatever raised, to do specific campaigning work, so that we keep our government funding separate, and obviously because we've got a work programme, we ask government about what we have to deliver for the funding that we get, but we keep that separate from other campaign activities, which we fund separately, so I don't know if this is an issue about the source of the funding, or the activities and the campaign itself, however it is funded.

TP I think that's not something that we picked up before, about what the source of that income is, but specifically this is about there are financial thresholds placed on campaign activities, whether that's national per individual NGO, or whether that's within constituency level, so those proposed thresholds being the £2,000 for an NGO in Wales. What activity would you measure up to that £2,000?

I think the proposal in the current draft is that that would be all costs, including staff costs, and running operation costs and the organisation.

AL One thing that we don't believe has been taken into consideration is the fact that we operate bilingually in a lot of organisations here, so we have to have translation costs in that fee as well, so once you add in translation costs, the staff costs and everything else, to get £2,000...we'll get through it very quickly.

RC That's a point I want to raise, this Welsh managed legislation coming in in the next few years, and it's going to be a legal requirement for many organisations to operate bilingually, so this isn't something that [unclear], it's expected and it's expensive.

AL It is very expensive, yes.

RC It's also alternative formats as well, so communication to support people that need to access campaigning information, events or whatever. You won't get much for £2,000.

TP For disability groups [unclear], that's interesting that we have the vote, are there any things that you think should not be included? I assume that the fact that translation costs, different formats, anything else?

HE Yes, I'd say definitely staff time and costs would be a bureaucratic nightmare to try and account for. A lot of our organisations where it's not one person's sole time, and it's split into a million different jobs, quite often and trying to work out what would fit into specific regulation, would be very difficult.

RC I think it would be very difficult for membership organisations, such as the WI. We work very much with our members, all our campaigning work comes from the grassroots, and then there are active communities, so to try and count that, put a cost on that, the time that they give, to campaigning locally and liaising with their MPs and so on would be very difficult.

RC Is there also an issue for organisations to operate a UK level of sharing written work, that we do all the time, in London and Cardiff, and [unclear], and is that counted twice, or is that once, how does that work?

UM [Unclear] ours is a bit ad hoc and we're not too sure, to be honest, so I wouldn't like to try to

put a [unclear] but we have a Welsh office, so...

RC Yes, [unclear] and you look at the Welsh..

RD And, it's quite common in Wales for organisations to work together and produce a joint manifesto, so again, is that £2,000 spread between five organisations, or is it £10,000?

AH We need to work with the group structure, where the top group structure and it's also a care company [?], and so it's campaigning on wider issues but we would have a joint manifesto for every election, and it's where you count the cost through the organisation. There are some shared resources as well, so it's a minefield.

TP Okay.

RT Regarding pensioners and [unclear] five organisations in Wales who are campaigning for pensioner's issues, and they're actually, they represent, each one is represented on the other one's body organisation, if you are talking about one particular group decides to campaign on something, and they all agree with it, then it brings the question, where do we stand? Because, you can define it, but actually they're all lined up in one particular course, so if you say where the cost goes on that particular policy, it's impossible to influence, this will be impossible to sort it out.

TP I'll move onto the next question, which is about what level based thresholds should be, I'd say that the proposal at the moment is to change the threshold from £10,000 in England to £5,000 and in Wales, Scotland and Northern Ireland, from £5,000 to £2,000, and that's the amount we can spend in a year before a general election on a campaign before you hit the threshold, and that's where the capital is you can spend. You have to be registered.

Whether you think that is an appropriate threshold, whether you think the current threshold is appropriate, the proposed one is appropriate or if you think...how much do you think it should be?

GB Sorry, Toni, can I just add also a point from the meeting with the report writers yesterday, that was just basically in doing this, writing the report, we're trying to get the balance between transparency and also appropriate controls on spending, because I don't think anyone is going to claim, we might claim that spending should be unlimited, and that's one question, but in terms of setting these thresholds, it's what level is an appropriate level of transparency, ie if you're spending that much money, you need to be able to tell the electoral commission that, but is this cap going to be so low that it's an inappropriate level of transparency, that's just bureaucracy, but conversely, moving it higher would reduce transparency, and it's a separate question to the overall spending cap, which is a question of controlling undue influence.

OG[?] The question there would be whether there's any proof, if you're going to change it, there should be some sort of evidence base on which you decide, okay, that's too low for Wales, and

where that, and then you change it. We seem to be going the wrong way around, and it seems like Northern Ireland, Wales and Scotland are all seemingly at £2,000 for completely no justifiable reason, as far as I can see. So, there's no evidence base to it, and this seems to be the burden of proof on whoever is changing it from what it is, and nobody seems to be...I never heard there was a massive conflict before, particularly. That might be, so it seems to me that's the way to structure.

HE Can I ask a question, for clarification, so I remember the point? The threshold, is that applying to the Westminster election and not the Assembly election, or will the Assembly election threshold stay the same?

[Overtalking]

OG They're just the Westminster elections. Assembly will stay the same, so we have much higher, for four months, we'll have a much higher Assembly limits, for the Assembly election than we would have for Westminster election.

RC What is the limit?

OG I have looked at it, I can't...

HE 30,000, that's [unclear]. In that context, I don't quite understand why in England and in Scotland, Wales and Northern Ireland it goes back to the structure of our organisations. I know that Friends of the Earth, England, Wales and Northern Ireland register during election periods. We never have in Wales. We're not a separate institution or organisation, so it seems strange that there's the limit, and who would have to carry it, which part of the organisation and who do you report to? So, that really... it's unclear on that, and obviously it's very closely linked to what should be regulated. That's really the clincher.

TP I suppose, it's how much do you think an organisation should be allowed to spend before they have to notify the public that they're spending that money on campaigning around a general election? And, I completely understand if you, as organisations, don't have a view on that, and I think what you've said about the lack of evidence base is really key.

RT I think that the base of 2,000 is very low, and I think it would just be foundation costs. You're suddenly capturing whole loads of small organisations that shouldn't really be part of democratic debates and I think that in Wales perhaps this is not really appreciated. Maybe that the organisations tend to work with the DTO, including organisations and others that are supposed to be part of the culture, that we use the third sector as scrutiny and policy development tier. That we supposedly pick up when it works best, and so to have that happening with the uncertainty around the policy, which policies would be captured and which wouldn't be, seems to be a stranglehold on what people can say, and even if it's only perceived as we might not be able to say this, we're suddenly strangling a whole load of democratic debates here.

Given that we've just did a report on the lack of capacity in the Assembly, 60 Assembly members is very small, and on that basis, that there's a relative lack of scrutiny that 60 members can do, that means that it becomes that much more important for holding the Welsh government to account, so it has particular impact here in Wales, I think. Sorry, I went on there.

AL I personally think that translation costs should be exempt, because there doesn't seem to be a benefit in increasing the amounts to cover translation. They should be excluded.

RC Picking up on Ray's point earlier, about lots of organisations go together on specific issues, and it's not quite clear on the finance. So, is it 2,000 for all those organisations working together, or is it 2,000 per group? Does that make sense? Would we all be able to spend 2,000 within that coalition of organisations, or would it only be 2,000 for that coalition?

TP It's 2,000 a campaign, correct me if I'm wrong.

OG I think it's per group, isn't it? But, I'm not...

CH There's a grey area of who is a constituted group, or what groups/coalition/joint campaign, all these different structures.

OG Isn't it as well for a coalition that the spending is for the whole of them, that has to be split equally between them, so would that not affect the smaller groups in a coalition? That means it would be a disincentive to join a big NGOs, and the smaller ones might not feel able to participate, on the basis that that [unclear].

RD We work together, and those who can afford to financially support the campaign do that, and others just support in other ways.

TP Yes.

GB Toni, can I add one bit to that? If the definition of non-party campaigning excluded everything that your organisations normally do, if that makes sense, where do you think this spending threshold should be? If everything you normally do were excluded and then you decided to spend on something that was very obviously promoting one political party? I'm trying to be hypothetical, would it be right to have this threshold or a higher one, or should it actually be much lower?

It's an interesting one to test the idea of a threshold, apart from the definition.

RD If that were the case, it wouldn't apply to us at all, because our campaigning is around policy issues. We speak about policy that impacts our beneficiaries, and we're not looking to influence the election, we want to influence public policy.

HE I don't know if we've got examples of that, the charity commission rules, I can't think of them.

AL Anna from WCVA, the majority of our members, there wouldn't be any campaigning, other than for policy issues. It's simply to raise issues that affect the organisations. It's not for political benefits at all.

Can I make one other point, while I'm speaking? In going back to the point about the fact that England have, that we all have different levels to England, we don't really understand why that would be the case, from a WC perspective, and extra things that we have to take into consideration. The fact that we've got three elections, with the Assembly, UK and Europe, and we've got 60 more AMs that we have to have conversations with them. Two administrations to work with, and then the translation costs on top. It obviously adds this extra level as being somewhat penalised, then we've got the lower threshold to deal with as well, so even as it stands, we just don't see the reasoning behind this, as having lower thresholds at all, than England.

HE And also, I think we made the point in previous sessions that organisations in Wales tend to be pretty small. We don't have these vast structures, with bureaucracy and maybe members of staff that just deal with finance. That's a luxury for most of us, to be honest, so setting a lower threshold in Wales would seem unfair, because we have smaller organisations having to deal with the bureaucracy, whether appropriate or not, of registering and accounting for all of our work.

TP Thank you, so to come back to something you were talking about a moment ago, around overall spending limits, and overall spending on a campaign, leading up to a general election should be judged, so at the moment, the limit is 5% of the political party spending limit, do you think that's appropriate? How do you think we should judge what is acceptable for an NGO or third party to spend in the run up to a general election?

Silence is deafening...

RT If you're saying we spend on supporting a particular party, that is one thing. That should be clearly defined, but if you were saying, like we said earlier in the meeting, that we campaign on all issues, then that would be in essence what civil society is about, then I don't think there should be any restriction on what they spend.

We spend on campaigning whether it's an election issue or not. However, we have no longer [unclear] to what the effect they have in supporting a particular candidate [unclear] or people campaigning in London for the transport policy during elections, and they put in a leaflet supporting the Labour candidate, and he told them to stop, because in fact, if they had done it, it would be added into his costs. So, the fact of the matter is that the administration and the representation of the people's act is already there, and to raise the question, what is civil society organisation [unclear] to take place, is really to me a question which doesn't exist.

If they wish to campaign on a particular issue, then it's up to the candidates who they accept, whose policies and say, I support them or not. It is an electoral issue for parties, at the representation of the people's act was based on the candidate, then the question, this was some years back, about the role of parties, and parties should be included in the act, and that took place, so as far as elections take place, representation of the people's act, that is an electoral issue, in regards to candidates and parties, not a question of civil society campaigning on the issues, social issues representing the interests of people, particularly people who are not better off [unclear], in terms of changes to policy.

PJ Can I just come in here, Peter Jones, a lot of the NGOs, big and small campaign for the most vulnerable sectors in society, and there's a moral argument there about no, there shouldn't be any sort of limit. When you campaign on issues like my organisation is campaigning on issues for blind and partially sighted people, and we campaign for things like getting audio notices on busses, these aren't political...political with a small p, but they're not really about politics. They're about moral issues in defending the weakest part of society, and a lot of them are most vulnerable. In those circumstances, there should never be a limit, at election time or any other time.

CH Can I correct myself on something I said earlier about limits? So, the last report, £30,000 is the spending limit for the performance tied to the Assembly election, but apparently the reduced threshold for registration would apply in both elections, I thought that I understood that it was only Westminster, but from the legal briefing that we got earlier in the process, and the commission's report, that I understand that the threshold for registration would apply to the Assembly election as well, so the £2,000 would...I think there will be more outrage from civil society in Wales, if we make that clear.

That would affect a lot of us, and it would be a situation where in Wales, it would mean that it was a campaign for the Assembly election organisations would be responsible for, so we would have to register.

TP Yes, just for clarification, the threshold at which you have to register, the reduction in that would be in place at the elections, but the reduction, that overall capital on what you can spend wouldn't be, is that right?

CH I don't think we were clear when we were answering that in the previous question, so I just wanted to make sure we got that right.

RD You can still spend 30,000 but you'd have to register once you went over 2,000?

AL Previously you didn't have to register till you went over the 30,000?

CH I don't know. I believe so.



TP The new limit on what you can ultimately spend in Wales would be 24,000.

CH For a Westminster...

TP That would be for a general election, not for the Assembly election.

CH I suspect a lot of us are much more concerned about this situation for the Assembly elections, than we are for the Westminster elections, so much more involved and engaged. So that needs to be clear.

UM [Unclear] in the same way as well.

HE The political parties don't have the same caps, because they can spend money on canvassing and staff costs, within this bill.

TP I guess the question is, on what evidence base do you make the decision, rather than what should the figure be, so what things would you feel you can do, that you think there shouldn't be a limit, or there should be a limit, rather than at this point focusing on the numbers themselves? Does that make sense? What should the rationale be for making a decision about the threshold?

If I can just add from the London evidence session that we had, on Monday in London, there was an enormous amount of concern around this, which of course is odd, considering that you're in the devolved nations, your amount is far smaller, but it was based on the fact that these numbers have been picked out of the sky, and so we tried to move the conversation away from what do you think these numbers should be? What do you think is fair? Should it or shouldn't it be linked to [unclear] political parties?

It was more about in principle, different organisations have different levels of campaigning functionality within them, and so therefore different organisations feel much more squeezed by this than others, so I think we didn't get desperately far in London, but we're trying to get some sense from you as to what would be the kind of evidence base that should be thrown into the mix, to be considered at some subsequent time. I don't think it's got to be brilliant ideas thrown into the pot at this point.

RD I think the point that's been made is to distinguish between raising awareness of policy issues and specific campaigning as politically motivated. You need to be clear about what this covers, because the thing is, we put out stuff all the time about different issues, hate crime, independent living, direct payment, everything we do can come into question, if it's such a broad definition.

AL I'd support that as well. I just wonder if the cost of making these changes, how they weigh up against the value of reducing the threshold. The cost of policing it, once these changes are

made, what's the benefit? I can't understand that at all.

RT And, what's the profit? Because, yes... I've lost my train of thought there.

TP Who would regulate this, the charity commission?

AL The electoral commission, is it?

CH Just to interject there, basically, the commissioners had a meeting with some of the ministers earlier this week, and it was suggested, although not set in stone, but it was suggested that the charity commission and the electoral commission may not be in a place at the moment where they could regulate this, and police this, and so therefore part of what would need to happen is the government would need to find extra resources leading up to an election, in order for them to be able to police and monitor that, and be available for you to come and register, and to answer your questions, etc, and again, that was something that the commission threw out, saying it can't just be in the four weeks leading up to an election.

This needs to be a year leading up to an election, as to how that works, so that's another thing that's been thrown in the air. You make a very valid point, you will need people to go to, to ask, to support, to get questions answered, etc, and are those structures in place?

[?] The charity commission struggle to deal with routine enquiries, and they don't really, they're a very light touch, as we know in Wales. I don't know so much about the electoral commission, I don't get the impression that they're all over the place or anything.

RD I think the majority of people within charities and that support charities would actually like to see the money that would be spent on that given to the charity commission, to actually support charities overall, rather than just in relation to this particular point. They've had their budgets slashed by a third, and they can't operate on the money now, so if they can find the money for that, why can't they find it for other things that we actually need supported, but I know that's a separate point.

[Overtalking]

UM The commissioners, children and the elderly are... the civil organisations that are campaigning on policies affecting the two groups have been basically accepted by the commission as for both children and the elderly, the whole question to me raises in Westminster parliament very much, you could have a campaign run on specifically the welfare of any of the two groups which the commissioner is supporting, and the voluntary organisation is supporting, which could lead some way directly into Westminster policy, and... that is a question that's going to arise, in terms of what is being proposed. It's a major question for the Welsh Assembly, not only for the civil organisations, because it's directly interjecting to what is actually a decision which all the parties, the four parties in the Assembly, the commission policies support, so it

comes into direct conflict.

TP Thank you.

RT Yes, I got my train of thought back, so what we've said actually about the present system of having a campaign that actually supports candidates or a party, is at least clear and we can at least understand what's being captured and I think that's the danger of any law that isn't that clear, is we can have all kinds of indirect consequences that we don't know about yet clearly, and at least with that version, we know precisely what we're looking for. We can say what it is, and I'm not sure really what else we can use that will capture policies and political activity, and even if we did, I have a feeling that if we simply go against conference or events, rallies, there would be a shift to go, okay, just do everything online, because the social media, we won't be...it won't be costing us so much, and we won't be printing our reports and so on, which our research has direct impact on what we're campaigning for, so I'm not sure if that's captured within [unclear] and the capacity of the Welsh Assembly which is calling for 170 members.

It's likely that two parties here are supportive of at least having more Assembly members, we're not sure one of them and one is probably hostile, or might have a different view from London and in Cardiff, but is that the report captured, because that was quite a lot of work and quite a lot of resource, so the question is, if we just do everything on PDFs and online, and all our campaigning online, we will be in a position where everything we do is virtual and is that going to have an impact on the right level as well? Are there disincentives to say that's good for democracy as well, I guess? [?]

TP I think that we touched on the next question and again, some of you have given some answers to it, but I want to check that there is anything else you wanted to say, and that's about third parties working in coalition to each other, in the lead up to a general election, and how that can be measured and the possibility of how it can be measured, and what the problems are in doing that, and how it should be regulated or restricted, so if all of you went into coalition next year with each other, how we would reconcile all that.

HE I'll start with most of us are in some sense with each other. We've a lot of coalitions, and we've 40 members and that's [overtalking] we do a lot of work in coalitions, partly because our resources are so stretched, and partly because it's a model of civil society, that encourages us to do it that way as an inclusive part of the process, effectively influencing decision makers, so it would have a major impact, if coalitions had to account for their spending, jointly or register.

And, if we include thresholds, spending caps, and campaign activities that this bill proposes, then it would make all of our coalitions absolutely impossible, and we would all just have to cease that, because there are rather long time periods of 16 months to two years for that.

In terms of what could be counted instead, I guess, all the organisations, the third member coalitions would register themselves, if they fitted to the thresholds, so that would be appropriate,

so I don't think there's really a problem or a need to counter coalition [?] on those as well.

TP I suppose, the issue is if the threshold that you have to register is £2,000, and so ten organisations were working together, each spending, contributing just less than 2,000, but spending together between them 20,000, do you think that that should be recorded somewhere, because under the new regulation, it wouldn't be. I'm not saying it should, I'm asking but if they were running a single campaign together and spending that amount of money on it?

You can say no.

HE No, but I just don't think anyone looks like that, but some larger organisations maybe contribute money, some smaller organisations contribute time, access to memberships, or an event, yes.

RD It's difficult because it also means that organisations would stop working together, if it became a choice between their own organisation and working in coalition, which would have a double whammy, they'd maybe have to decide, we can't work with you on this, because we need to focus and keep our money for our own campaign, I don't know. It can have a negative impact as well, on groups coming together.

AH I think it comes back to spending caps as well, because we've got those smaller organisations maybe who just contribute resources or staff time, and then if they're counting that, then that reduces the spending threshold and everything, and I think on a wider point, around coalitions, it's what qualifies as a coalition as well. And, you've got to inform the groups that work together on campaigns, and it might not have terms of reference or a constitution as such.

RD It all comes back to the fact that this bill should...its aim should be around campaigning to influence an election. Which parties, which individuals, people vote for, and so I think certainly from our perspective, what I'm saying is it shouldn't cover us, because we're apolitical. We work with all parties, and it's about issues that affect our beneficiaries, and for me, that's just the key message for me.

TP Yes. Loud and clear.

CH Yes.

RD Plus, it's not a level playing field, that political parties don't have to charge for their staff time or for their activity costs, campaign costs, or canvassing, so they are exempt from that, so why should they be and the third sector or NGOs not.

CH I think, just to add one more point, which is coming up, what I think you've all collectively said is that the challenge that we have with this, and the commissioners were talking about it earlier

this week, the fact that so many of these pieces are independent, or we don't mean that, so many of these pieces are linked, so therefore you move one of them, then you are then going to have to think about what knock on effect there will be for the other one, and then how then if we define coalition working in that, then how then...so to just literally go through these pieces in the bill, we'd like to make an amendment to that or that one, may not be possible, because if you define X as something, it will then affect how the other pieces will work, so you're right, it's a bit of jigsaw puzzle here, and I think that's why we've got to think a little bit creatively about how, what we think is reasonable evidence base on which this could be then decided, and then which gets linked to which, so just add to the mix.

TP Is there anything else we need to pick up from that area, of working in coalition?

UM A lot of things that take place, including many statements earlier, there is a direct link historically to what we're talking about, and then like the parliamentary session, and the issue was about financing parties from taxation, and when that fell through, some people are falling back on this particular issue, because it's really the electoral leverage during an election, and because they've opened a Pandora's box in what they're doing. And, it's not been thought out in terms of its general implications for civil society.

TP Thank you. Just to move on, we have answered quite a few of the questions already, but there are some to add about constituency spending limits and whether they're workable in Wales, whether they should be introduced at all, and how they would work. And, if we can come up with one that would work.

RC [Unclear] it was covered by at least five Assembly members, some of it regional, so how do you work around that? Is there a threshold for each Assembly member, or a threshold for all the ones that support the campaign [?]?

AH We have constituency thresholds and then regional thresholds as well, or would it all combine to regional thresholds? There's no guidance on that all at the moment.

HE I don't think regional lists were mentioned, certainly in the early drafts of the bill anyway, and I'm not sure if anything has happened since then to improve that, but we don't...we quite often campaign on a regional level, for everyone, all the regional members, so it would be just...

[Overtalking]

UM [Unclear] at the Assembly elections, but having been some spectacular [unclear], I'm saying I'm thinking that might be the case.

TP Do you think that the principle of limiting the amount of money that you can spend on a single constituency is correct?

OG I have a problem with that in terms of, given that it's around issues and policies again, what is a local issue? It's quite difficult to define it sometimes. Using our own example, we did some work for the Westminster election around how many safe seats there were in Wales, where we...are we particularly attacking those candidates for being in safe seats, and not all the candidates, the ones who were bound to win, was that something that we were using as an attack, and again, was it something that would seem to be supporting the Liberal Democrats, because it's... I don't think it was, but I guess you could reasonably read it as being to a party's advantage, but would that be looking at their constituencies?

If we were pointing out particular constituencies where there were particular safe seats, but it's an overall framework for us, it's a national framework of how you want an election to be done, and I can imagine there are probably better examples of that, such as the M4 relief road now, issues around being built in Powys, I can imagine, they're local issues but they still have a wider national... local issues, are those issues which would be captured by this, which would mean that organisations couldn't say so much about them, despite it being... in other words, is this capturing something that is not, on the face of it, supposed to be capturing, and is it leaving people not being able to talk about issues that they should be able to talk about, in a democratic debate?

TP Thank you.

HE We not only influence policy at a national level in Wales, but also support communities particularly to campaign on a local issue or a local proposal, or case, whether that's positive or negative impact on their communities. For example, a few years ago we were very involved in the campaign against the incinerator in the Plymouth [?] local authority area, so [unclear] and Romney constituency. That wasn't during an election period, but if it had been we would have wanted to continue that campaign there, which there was a local authority involvement, but it also involved Welsh government waste policy, and was ultimately an energy issue, which would be decided by the planning commission, on the basis of Westminster guidance and policy.

Because, it was over 50 megawatts and therefore not a devolved issue, so that just highlights the complexity of what counts as local, national in a Welsh context, and UK level policies and decision making, and that was all under our support and we were focused on one specific constituency, and we would have...although that wasn't aimed at any political attempt to get anyone in or out of power, it was a political campaign, which did involve politicians and was aimed at the constituency, but would have appealed on all counts in this bill.

AL I don't know if it's a point you want to make, but the difficult with Wales anyway is that Labour dominate, so there's actually very little... most of the ground is in a position, turns out to be the three smaller parties, that's where the change happens in elections, because Labour's won in the last three or four Assembly elections, so it's not... even if there was a major issue here, our capacity in Wales to change that is limited.

It feels very...somewhat an artificial discussion in a way, it's just not... going to change things, and obviously what you have to do is be mindful that you can't just...it is a cross party system, so you've got to engage with everybody, but actually influencing elections in Wales is not going to happen, that's my personal view.

It depends what your view is, but...

TP I think we're going to have to move on, in the interests of time, and I think we've covered some of these questions as well, but do you think that it's acceptable for the devolved nations to have different thresholds for registration and different spending limits from England? Do you think that they should be the same as those, or do you think they should be lower, higher, why do you think that?

OG Guide Dogs is a UK organisation, headquarters is in England, in Reading, and we've got offices in Scotland, Northern Ireland and Wales. How one earth are you going to fit that around, and somebody mentioned Oxfam earlier, how are we going to fit in organisations that are cross administration? It's going to cause immense difficulties.

GB Has anyone ever felt disadvantaged with the current spending limits are low obviously in Wales, has that ever been a disadvantage or has it seemed unfair before? It's not really an issue maybe?

RC How many have been regulated, that's the issue.

TP Sorry, I can't hear you?

RC I was asking colleagues how many of us here, how many organisations have been regulated in the past, and everybody said no, and that's the issue here.

HE How many would have been?

RC Exactly, how that would change.

CH I think we can look at the run up to the last Westminster election, I think the general consensus is that there are organisations that have fallen foul of this. I don't think there's any question about that, but it kind of was under the radar, and the electoral commission didn't know about it, and it wasn't such a big deal.

What's happened now of course is that, because the squeeze is within this now, it's started to get everybody to sit up and read the legislation, so I'm not being insulting to anybody but I think it's fair to say that a large number of people wouldn't have known the details of this before we got this, so that's the reality.

I think it comes back to in Wales, the spend in a year up to an election goes from 60,000 to 24,000, in Northern Ireland, it goes from 27,000 to 10,800. What do you think the evidence base should be that any numbers should be picked from? Do you have any ideas in terms of again, George mentioned whether it is based on what political parties can spend, and if you think about constituencies and Assembly, I think that MPs, at least in England, MPs will have a concern about the limit of what they can spend, in the year leading up to an election, and how that is affected by what charities and NGOs can spend, although you can also argue, if you are paying your subs to get your charity to help you in a local area, be that fracking, or Lewisham Hospital or whatever, if you, the general public, choose to put your money into that organisation, to get them to do something that is totally local, that they really believe in, who are the government to stop you?

Because, if you wanted the government to do it, you would have paid it into a political party, but equally, you can see it the other way around, where you're saying, okay, it could result in being undue influence. So, I can see both sides of this, and the commission can see the logic behind this, but we need to know what you think the evidence base should be, on where... these numbers should, could come from?

OG The definition is the definition of undue influence, again isn't it? Is it that you make a decisive difference in an election, that's a very high barrier, or to make it more realistic, it's not going to be, is it? It's going to be in a reasonable assessment, is that piece of work to somebody's advantage, more than to somebody else's which is an [unclear] thing, so that's a massive gap, a no man's land between reality as things are and where... even if I'd almost love to be able to have the power to influence an election, on a personal level. I'm not speaking about the electoral society, but it's in realistic terms, that's the... the third sector organisations and NGOs are not in that position, and are not seeking to be in that position, so if the issue is undue influence, surely it has to be captured by whether they're clearly going out and going for that particular party, or against that particular party, and in order for that to be captured, there has to be something pretty specific, I think, and it seems to me coming back, the current legislation seems to be at least clear about what activity that is, and I can't see anything in the commission which actually captures that, which as I say, the influence seems to me...really, I can't see that as being measured by having an influence by percentage in an election as feasible to be measured.

I can... maybe there is a way to measure it, but to me it seems fairly subjective, and it seems to me that it's going to catch loads of things that we do, whatever we're trying to do, so again, I can understand MPs being worried about somebody having more influence in their constituency that will set the agenda and change the parameters of the debate and that sort of thing, but that is what electoral politics is about as well.

But, if there is undue influence there, we need to be looking for the evidence, rather than just it seems to be hearsay and on principle at best at the moment, and I'm probably being quite kind, so if there is that evidence there, if you can point to examples, serious examples, then we can discuss what we can do to stop it, but I can't see that those examples are there at the moment.



TP Thank you.

HE I was going to say, this is one thing, a feeling that I don't feel that I have the information to answer, or the figures, on spending limits, but if there's no problem proven with the current limits, then why should it be reduced? That's a commonsense approach I'd take to it.

TP Yes. Thank you, so the next question is around what should the reporting requirements be, for non-party components, so how, or what should you be expected to do, to report your activity, and that's a balance between what should a responsible NGO or civil society organisation be expecting reasonably to do, to be transparent to the public, and what becomes needless bureaucracy?

HE Well, I think all charities have to provide a governing document anyway, so we all have to work within our objectives, whatever they are, so I think we're already quite transparent, or we should be, and...

AL We have audited accounts, to the charity commission.

HE That's right, and if you're not within your objective, then you [unclear] and your legal team, taking a step back.

RD I guess there are organisations, bodies that are trying to get support from charities, making charities exempt, or different rules for charities that could be a proposal that the government could come back with, something like that, and we don't want to fall into that trap.

But, there are a number of quite likely smaller organisations that wouldn't be registered charities, that wouldn't meet requirements at the moment, which might be trapped by this legislation. If it becomes so bureaucratic, they think, why am I bothering?

CH I think just to add to that, there is already amendment down in Lords to take charities out of this legislation, and there is quite a lot of backing for it, so that is something we need to be aware of, the idea being that charities would be governed under the charitable law, but it's interesting because a number of organisations that we speak to who are charities, and those who are not charities do not feel that that's fair or reasonable, because you have, let's say, the League Against Cruel Sports campaigning against the Countryside Alliance, and they're on completely different playing fields, because one is a charity and one isn't, so the point you just mentioned, I just wanted to let you know that that will be noted down and debated in Lords.

RT [Unclear] all the pension organisations, because we're not charities, and further to that, means you are [unclear] which is linked to other parties, which have a direct political link, the minefield of all the organisations campaigning on most of the issues and issues affecting retired people, and campaigning on it, to really at the moment, it looks as if this provision, whether the

organisation will [unclear]. This is the implication of it.

TP Yes.

RT Because, and this is the fact that we show a base around the fact that civil organisations that are campaigning across a number of issues, those are issues that we [unclear] on the surface, and so it's [unclear].

TP Thank you. The last question is around regulated activity, so how would long before a general election should that be, and I suppose that goes back to your point about the burden that that puts onto organisations, and the amount of time you have to include in what's regulated, and what is [unclear], so the burden of having to report your activity, and that's about how long you think it's appropriate and if you have a rationale as to why you think it should be a particular period of time?

RT You have to excuse me now, I've got to go to get back home.

TP Thank you for coming.

AH Can I just ask, the period for politicians now, is the preferred period and that's set in law, something like three months, or whatever it is?

CH I'm not exactly what it is, but yes, they have now...

AH Why are they suggesting that a campaign should be for a year when politicians have a shorter period, and previously, not now, because they've now set dates for general elections, but previously elections could happen at any time, which in theory, there could be issues around when the regulated period will even happen, so there are lots of issues around it.

GB That has existed since...

TP I suppose even in the parliament act, a general election could be called at any time if the coalition disintegrated, so that's a possibility.

AH It seems a bit strange that NGOs would be expected to cover a year's activity, the people that stand for election have a very short period.

IT I think the political parties have to regulate their spending over that year, the candidates don't, I think, but that's [unclear] presumably that's how it goes.

AH If that's the case, again I'm very scared of saying these things, because I know I'm [unclear] to find out I was wrong about that.

[Overtalking]

It seems a bit strange as well... I don't know the rationale for the four month arguments for the Assembly and a year for the general election, for example, but that's not... I'm not arguing therefore that the Assembly should be for a year, it does seem... I don't understand what the rationale is for the difference, but whether that's... it seems, it's going to be linked completely with what's captured again on the policies. If opinion polls are in there, as things to be regulated, it seems to be a bit odd there. An opinion poll about eight months before an election would have to be kept covered by NGOs as electoral activity, or whatever the phrase is for electoral purposes. It seems that that's quite a long time beforehand, for some of this to be captured.

TP Okay, that's the last question I had. The only thing to say is that you had anticipated saying, that you came today and you have the opportunity to, if there are recommendations that you would make or you'd like the commission to make on your behalf to government about the bill? [unclear].

AH I would like particularly to know about the reserve matters issue, that's the one that I haven't seen anything on, and it might be covered, but that's the one that seems very grey.

OG The other issue I feel is the [unclear] WCB as an arrangement of how the funded WCBN [?], all sorts of ministerial meetings, coalitions, has that been taken into account in this period? The third sector arrangements, and that's what we need?

AL Yes, we've got a review going on about the third sector in Wales and how it's going to be working, so that's all going on at the moment, alongside this as well.

HE This is more personal, I think that our Assembly should have the rules for how it works with civil society in Wales, so that there's agreement around the table, I think it's inappropriate for Westminster to decide on what government threshold and spending limits, when we have a very good relationship in Wales, which is based on the Welsh legislation.

RC I think the lack of consultation on the last report, was unsuitable [?].

TP That's all we have time for and I'd just like to thank you all for giving up your time to help us put together some recommendations. I think there is enough data, particularly from this group of people, that we can put into the report to the government, and say the commission really appreciate your time, and any case studies that you submit, specific impacts that this could have on previous campaigns that you've run, or future plans, would be incredibly helpful in making this a compelling document.

CH One thing from me is you guys have been amazing. It's incredible that I can get people to come to meetings, and bear their souls and be reported, and contribute to the report, so thank you very much, but we still need more people to be aware of this. It literally terrifies me that the

organisations, really huge organisations who I speak to, and they've no clue that this is going on at all. So, I would urge you, if you could to make sure that you spread the word.

I'm not meaning campaigning about this. I'm just saying, civil society has a right to know they haven't been consulted with, and if you...I know we made progress, as we started off with about 40 charities and NGOs that were supporting the commission, when we first started engaging, and we've now got 75 or nearly 80, which is terrific. Daily I'm having people coming onto the commission website and saying, please can we officially support you? You don't have to pay anything to support us, but of course we need money, this report is costing us more money, so we're asking NGOs and general public to support us, but this is not a pay to play.

Anybody that feels that they want to put their name to the list, to go onto the website, and to be included in the email communications that we send out, we still need them, so please do keep sharing.

The fact that you're here means that you're concerned, so just really again, thank you very much indeed. [unclear].

[Overtalking]