



Anchor Court,
Keen Road,
Cardiff,
CF14 2QS

10th September 2013

Dear colleagues,

Re: Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Bill

I am writing to raise my concerns about the impact that the proposed lobbying bill will have on third sector organisations in Wales. As a charity that supports women in the Welsh economy, we believe in open and transparent lobbying and support the overall aim of the Bill. However, under current proposals, the Bill will prevent the third sector from properly representing stakeholders at decision making level.

We can see from the Section 1 proposals that the levels of campaign spend required for registration with the Electoral Commission are reduced which will force more third sector organisations to join a register in order to carry out lobbying activity. This will place an additional financial burden on small organisations and will also subject them to reporting processes. Many charities are already struggling to achieve more for less and this will place additional pressure on resource.

As an organisation with very specific expertise, we are often asked to comment on issues that affect women in Wales. We are particularly concerned that the proposals set out in Section 2 of the Bill will limit our ability to raise awareness of the disproportionate impact of policy decisions on our stakeholders. The proposals stand to prevent charitable organisations from engaging in meaningful debate around policy issues during the run up to an election which is such an integral part of democracy.

Furthermore, we believe that there has not been sufficient consultation with the sector before taking proposals forward. We support the amendment to assess the impacts on devolved nations before imposing the legislation in Wales and urge that a further equality impact assessment is carried out before the bill is passed.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Joy Kent', with a stylized flourish at the end.

Joy Kent

Chief Executive