



The Moorland Association

PRIVATE AND CONFIDENTIAL

For the attention of the Chair and Trustees only

Jonathan Riley
Chair of Trustees
Friends of the Dales (The Yorkshire Dales Society)
Registered Charity No. 515384
Company Limited by Guarantee No. 1822908

1 May 2026

Canal Wharf
Eshton Road
Gargrave
Skipton
BD23 3PN

By email [REDACTED]

Dear Mr Riley,

RE: FORMAL COMPLAINT REGARDING “EYES ON THE SKIES” – YOUR RESPONSE DATED 30 APRIL 2026

1. Thank you for your letter of 30 April 2026.
2. We note that the Board has considered our letter of 20 March 2026 and that you take matters of regulatory compliance and governance seriously. We also note your position that Friends of the Dales is not subject to the Freedom of Information Act 2000 and is not legally obliged to disclose internal trustee documents in the manner requested.
3. For clarity, our complaint was not made as a Freedom of Information request. Nor was its purpose to require wholesale disclosure of internal board papers. It was a formal governance complaint asking the trustees to explain, at a level appropriate for a registered charity, what processes, standards, oversight, risk assessments and compliance checks were applied before contentious material was promoted in the Charity's name.
4. Your response does not, in our view, answer those governance questions.
5. In particular, your letter states that the Board adopted a “rigorous approach”, is satisfied that the campaign furthers the Charity's purposes, and considers that the campaign has been conducted in line with charity law, Charity Commission guidance and good governance practice. However, it does not identify the basis for those conclusions. That is the central point. It does not explain who approved the campaign, when approval was given, what materials the trustees considered, what editorial standards were applied, whether any risk assessment was undertaken, whether any conflicts of interest or loyalty were declared and managed, whether any legal or

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compliance advice was sought, or how the Board assessed the risk of public detriment or reputational harm.

6. That distinction matters. The issue is not whether Friends of the Dales is entitled to campaign on wildlife crime or to advocate for changes in law or policy. We recognise that charities may campaign where doing so furthers their charitable purposes. The issue is whether the trustees can demonstrate that they made a properly informed, balanced and risk-aware decision, consistent with their duties under charity law and with Charity Commission guidance, before promoting contentious material as charitable education and campaign content.
7. Your response also does not address the specific concerns raised about educational presentation, evidential caution, implied condemnation of estates or individuals, broad-brush references to gamekeepers, and the foreseeable risk of hostility towards lawful rural workers. Nor does it address the concern that an Executive Director who is also a trustee was centrally involved in public-facing campaign activity, thereby heightening the need for clear independent trustee scrutiny and conflict management.
8. We therefore ask the Board to reconsider its response and provide a further substantive reply addressing the following points:
 - 8.1. What trustee approval was given for the “Eyes on the Skies” campaign, the webinars, the petition and related public messaging?
 - 8.2. Was approval given by the full Board, a committee, individual trustees, or staff under delegated authority?
 - 8.3. What editorial standards or guidance were applied to ensure that contentious allegations were fairly presented, appropriately caveated, and distinguished from proven fact?
 - 8.4. What assessment was made of legal, reputational, community cohesion and public detriment risks before publication and promotion?
 - 8.5. What consideration was given to the risk that the campaign’s tone or framing might increase hostility towards lawful gamekeepers, estate staff or rural workers?
 - 8.6. What process was followed to manage any actual or perceived conflict of interest or conflict of loyalty arising from the Executive Director’s dual role as trustee and operational campaign advocate?
 - 8.7. What consideration was given to Charity Commission guidance on campaigning and political activity, including the need for trustees to manage risk, preserve independence, and ensure that campaign material is accurate, evidence-based and justifiable?
 - 8.8. Whether the Board intends to review the webinars and campaign materials in light of the concerns raised, and whether any clarification, contextual note, correction or future editorial controls will be adopted.
9. We are not asking for every internal document to be disclosed. However, if the Board’s position is that a rigorous process was followed, it should be possible to summarise that process and identify the categories of records on which the Board relies, such as minutes, approvals, risk

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assessments, briefing notes, policies, moderation guidance, conflict declarations, or legal or compliance advice received.

10. We would prefer to resolve this matter constructively and directly. However, your current response does not provide a sufficient governance explanation. If we do not receive a substantive reply addressing the points above within 14 days, we will consider placing the original complaint, your response of 30 April 2026, and this further correspondence to the Charity Commission for its consideration.
11. Nothing in this letter should be taken as withdrawing or narrowing the concerns set out in our letter of 20 March 2026. All rights are reserved.

Yours sincerely

Andrew Gilruth

Chief Executive

Moorland Association

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