



The Moorland Association

Charity Commission for England and Wales
102 Petty France
London
SW1H 9AJ

19 October 2026

Dear Charity Commission,

Re: Formal complaint concerning Friends of the Dales

1. Purpose of this complaint

I write on behalf of the Moorland Association to make a formal complaint concerning the governance and oversight of the “Eyes on the Skies” campaign run by Friends of the Dales (FoTD), the working name of The Yorkshire Dales Society, registered charity number 515384.

The Association represents moorland owners and managers in England and Wales. We recognise that charities may campaign against wildlife crime and seek changes in the law. Our concern is how trustees oversee the material published and promoted in their charity’s name, including its accuracy and the risks of unfairly implicating identifiable workers or encouraging hostility towards them and their families.

We have sought to resolve these concerns directly with FoTD through a formal complaint dated 20 March 2026 and subsequent correspondence. We acknowledge the trustees’ response of 30 April. However, substantive questions raised in our follow-up letters of 1 May and 12 June remain unanswered. These exchanges have not resolved our concerns about the accuracy and presentation of campaign material, the trustees’ assessment of risks to lawful workers and their families, or the safeguards applied.

We therefore ask the Commission to assess these unresolved governance concerns and determine what regulatory action is appropriate to address any shortcomings identified. The evidence and the specific outcomes we seek are set out below.

2. Attempts to resolve the concerns directly

On 20 March 2026, we submitted a formal complaint to FoTD’s Chair and trustees, supported by extracts from its January and February webinars and evidence concerning abuse of gamekeepers. We requested a Board review and an explanation of the approvals, editorial checks and risk management applied (Annex 1).

Jonathan Riley, Chair of Trustees, replied on 30 April. He stated that the Board had considered our concerns, adopted a rigorous approach and was satisfied that the campaign furthered the charity’s conservation purposes. The response referred to recognised expertise, including the RSPB and UK National Wildlife Crime Unit (NWCUC), and expressly rejected the suggestion that the campaign would foreseeably increase the risk of hostility, harassment or community division (Annex 2).

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On 1 May, we clarified that we were seeking a summary of the processes applied, rather than making a Freedom of Information request or demanding wholesale disclosure of Board papers. We asked specific questions about approval arrangements, evidence checks, risk assessment and how the concerns about local workers had been considered. We requested a substantive reply within 14 days (Annex 3).

On 12 June, following a further webinar in May, we asked what review had taken place and what safeguards had been considered following our earlier correspondence. We requested a substantive response within 10 working days (Annex 4). Both follow-up letters explained that unresolved concerns might be referred to the Commission. As at the date of this letter, we have received no substantive response to either follow-up.

We acknowledge the April response and do not infer from the absence of further explanation that no governance processes existed. However, its general assurances did not answer the specific questions subsequently put to trustees. We therefore seek the Commission's assessment of whether the checks, risk assessment and subsequent review were adequate, taking account of the evidence and concerns brought to the trustees' attention.

3. The evidence of risk brought to trustees

Our March complaint included a reported incident in which a Yorkshire Dales gamekeeper faced verbal abuse and threats of violence after asking visitors to put a dog on a lead. One visitor reportedly referred to a FoTD webinar and described gamekeepers as "all evil criminals" (Annex 1, paragraph 14.5). We have not independently verified this account and do not present it as proof that the webinar caused the incident. It nevertheless put trustees on notice of a specific concern warranting consideration and, where appropriate, further enquiries.

The 2025 report by Professor Simon Denny, commissioned by the Regional Moorland Groups and National Gamekeepers' Organisation, gathered information from gamekeepers on 58 English grouse moors. For October 2023 to October 2024, it reported more than 1,000 threats, more than 1,500 insults and 30 keepers physically assaulted. The relevant survey question included keeper teams and their families (Annex 5, printed pages 22–23). These findings predate the webinars and do not establish any FoTD contribution to the incidents recorded. They demonstrate the existing context of abuse against which trustees were asked to consider the risks associated with the campaign.

Our complaint also identified webinar passages capable of inviting adverse inferences about local estates and workers. In February, a speaker referred to the hen harrier Sita disappearing "very close to two large grouse shooting estates"; another passage stated of Cersei, "before you ask yes, she disappeared close to a grouse moor" (Annex 1, Appendix B, items B4-B5). We ask whether trustees considered how readily the estates or workers concerned could be identified, what implications audiences might draw, and whether those implications were supported by evidence and appropriately qualified.

The same webinar discussed a named gamekeeper's guilty plea, which our complaint acknowledged. We also acknowledge a speaker's express recognition of conservation-minded gamekeepers who would not commit such offences (Annex 1, Appendix B, items B2-B3). The material should therefore be assessed in its full context. Reporting proven offending and discussing suspected incidents are legitimate. Our concern is whether the presentation clearly distinguished particular offences and suspicions from implications of wrongdoing by other identifiable workers or by gamekeepers as a profession.

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4. Consistent consideration of risks of harm

We welcome the Commission Chair's condemnation of intimidation directed at RNLI volunteers in her published Annual Public Meeting speech of 15 October 2026. Dame Julia Unwin also defended vigorous debate and called for a clear distinction: "To draw the line between heated discussion and emotive and powerful disagreement and harassment or abuse." The Times subsequently reported alleged bullying of volunteers' children (Annexes 7 and 8).

That distinction is equally relevant when considering risks arising from a charity's own campaigning. Lawful moorland managers and their families deserve the same seriousness of consideration when concerns about intimidation or personal targeting are raised. We ask the Commission to examine whether FoTD's trustees adequately assessed and responded to those risks, while respecting the charity's freedom to campaign and everyone's right to lawful criticism.

The RNLI case illustrates the importance of that principle; it is not evidence that FoTD caused abuse. Our complaint rests on the material identified, the specific concerns brought to trustees' attention and their response. We seek scrutiny of that oversight, rather than an adjudication of the wider debate about shooting.

5. Evidence checks and review after concerns were raised

FoTD's campaign page describes "*152 confirmed incidents of raptor persecution*" over a recent 15-year period in the Yorkshire Dales (Annex 6, PDF page 2). We ask the Commission to consider whether trustees adequately checked the evidential basis, definitions and geographical scope of this claim, and whether the public wording accurately reflects the underlying source material. This is relevant to the concerns already raised about the presentation of evidence and the implications audiences might draw about local estates and workers.

We do not suggest that a confirmed incident must have resulted in a criminal conviction. Our concern is whether the campaign clearly distinguishes established facts, suspected incidents and inferences about responsibility, particularly where identifiable people or estates may be implicated.

Our letter of 12 June asked what editorial review and assessment of potential harm had taken place before the May webinar, following receipt of our earlier concerns. We asked about speaker briefings, moderation guidance, risk assessment and arrangements for clarification or correction (Annex 4, PDF page 2). These questions remain substantively unanswered.

Reliance on expert speakers does not, by itself, explain how trustees exercised oversight of material published and promoted in the charity's name. We do not suggest that every speaker must be counterbalanced by an opposing speaker. We ask the Commission to assess whether trustees adequately reviewed the specific concerns raised and applied appropriate checks and safeguards to subsequent campaign material.

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6. The basis for regulatory assessment

FoTD's published charitable objects include conservation and the social and economic well-being of local communities. Gamekeepers and estate staff form part of those communities. We ask whether trustees adequately considered possible harm to lawful workers and their families when deciding how to present and promote the campaign, and whether they properly reviewed the specific concerns subsequently raised.

The Commission's public-benefit guidance, PB2, also addresses managing risks of harm to beneficiaries or the public generally when carrying out a charity's purposes. We ask whether trustees had regard to that guidance when assessing the concerns about lawful workers and their families, and what steps they considered appropriate to identify and minimise those risks.

The Commission's decision-making guidance, CC27, explains that trustees must be sufficiently informed and take account of all relevant factors. It also advises keeping proportionate records explaining decisions and their reasons. We ask the Commission to examine the information and reasons supporting the trustees' April conclusion that the campaign would not foreseeably increase hostility, harassment or community division, and whether that assessment was reviewed before the May webinar. Relevant decision records would assist in establishing how the specific concerns and reported incident were considered.

The Commission's campaigning guidance, CC9, recognises that charities may campaign for legal change and use emotive or controversial material. It also requires trustees to weigh benefits against costs and risks, and states that such material must be factually accurate and have a legitimate evidence base. Our complaint concerns how those responsibilities were discharged in this campaign. The Commission's Charities and social media guidance addresses responsibility for approving content, managing harmful material and taking corrective action (Annex 9). It also advises charities engaging on emotive issues to assess risks and keep written records of their decisions. We ask the Commission to consider the adequacy of FoTD's arrangements for material published or promoted through its social media channels, including after trustees received our concerns.

The Commission's Safeguarding and protecting people guidance requires reasonable steps to protect people who come into contact with a charity through its work, extending beyond staff, volunteers and beneficiaries. It identifies bullying, harassment and emotional abuse among relevant harms (Annex 10). We ask the Commission to consider whether and how this guidance applies to the affected local workers and the reported incident, and whether the trustees' response was adequate. We do not assert that a safeguarding breach has been established.

We recognise under CC47 that the Commission prioritises concerns according to seriousness and risk and does not adjudicate every complaint. We ask it to assess the combined evidence concerning the campaign material, the reported risk of harm and the trustees' response after receiving our concerns. The unanswered follow-up letters form part of that assessment; they are not the sole basis of this complaint. We seek an assessment grounded in evidence and the applicable legal and regulatory framework, respecting FoTD's freedom to campaign lawfully.

In our view, the combination of a reported incident involving threats of violence, specific campaign passages capable of implicating local workers, and substantive questions remaining unanswered after further campaigning warrants targeted regulatory enquiries.

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7. Action and resolution requested

Please treat this letter as a formal complaint concerning FoTD's governance and trustee oversight. We ask the Commission to assess the evidence and, where appropriate, obtain explanations and relevant internal records from the trustees. In particular, we ask it to establish:

- What information and reasoning supported the trustees' April conclusion rejecting the suggested risk of increased hostility, harassment or community division.
- What consideration was given to the reported incident involving threats of violence, including whether further information was sought and what response was considered appropriate.
- What review of the identified risks and safeguards took place before the May webinar, following our March complaint and May follow-up.

We recognise that the charity is not obliged to disclose all such records to us. Our request is for the Commission to examine the adequacy of the trustees' assessment and response.

We ask the Commission to determine whether regulatory engagement is warranted and, where shortcomings are identified, take proportionate steps within its remit to secure their resolution. In particular, we ask it to consider:

1. Whether trustees adequately assessed and responded to the risks to lawful workers and their families, including the reported incident brought to their attention.
2. Whether the public claims identified accurately reflect their underlying evidence, including the relevant definitions and geographical scope, and whether clarification or correction is required.
3. Whether appropriate safeguards against unfair personal targeting are in place, supported by effective evidence checks, editorial oversight and arrangements for reviewing concerns about campaign material.
4. Whether the trustees' response to our complaint and subsequent correspondence adequately addressed the substantive governance concerns raised, and what further review or action is needed.

Please ensure that your assessment addresses the reported incident involving threats of violence, the campaign passages identified and the trustees' response after receiving our concerns. If the Commission concludes that these matters fall outside its remit or do not warrant regulatory engagement, please explain the relevant criteria and how they have been applied to the evidence supplied. If further information is needed to assess a material concern, please identify what would assist.

With their agreement, we would welcome the opportunity to facilitate a meeting with gamekeepers and, where appropriate, family members who can describe their experiences and the concerns raised in this complaint. This would enable the Commission to hear first-hand accounts and explore

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the evidence directly. We would also be happy to help arrange written statements or individual discussions if these would better assist its assessment.

Please acknowledge this complaint and provide a reasoned response explaining the Commission's assessment and any action it proposes to take. We also request notification of the outcome of any resulting regulatory engagement, so far as that information can be disclosed.

We can provide further source material or clarification if required.

Yours sincerely,

Andrew Gilruth

Chief Executive

Moorland Association

agilruth@moorlandassociation.org

Supporting documents

1. MA formal complaint to Friends of the Dales concerning "Eyes on the Skies", 20 March 2026, including Appendices A-D.
2. Friends of the Dales' response to the Moorland Association's formal complaint, 30 April 2026.
3. MA follow-up letter concerning FoTD's response of 30 April, dated 1 May 2026.
4. MA follow-up letter concerning outstanding correspondence and the May webinar, 12 June 2026, including the webinar transcript and MA's key-points summary.
5. Simon Denny, *Wildlife Warden, Conservation Manager, Fire Fighter, and Educator: The Grouse Moor Gamekeeper in England in the Twenty-First Century*, March 2025.
6. Friends of the Dales, "Eyes on the Skies" campaign webpage, accessed 18 October 2026.
7. Emma Yeomans, "School bullies 'target RNLI crew's children over migrants'", *The Times*, 17 October 2026 - photographic copy.
8. Dame Julia Unwin, "A precious treasure: sustaining charities, building communities and protecting public trust", Annual Public Meeting speech, 15 October 2026.
9. Charity Commission, *Charities and social media*, updated 21 April 2026.
10. Charity Commission, *Safeguarding and protecting people for charities and trustees*, updated 8 October 2026.

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