



The Moorland Association

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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

20 March 2026

Canal Wharf
Eshton Road
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BD23 3PN

By email [REDACTED]

Dear Mr Riley,

RE: FORMAL COMPLAINT REGARDING “EYES ON THE SKIES” – GOVERNANCE, EDUCATIONAL STANDARDS, AND CAMPAIGNING COMPLIANCE

1. We write to raise a formal board-level complaint concerning Friends of the Dales’ “Eyes on the Skies” campaign, including two webinars promoted in January and February 2026. We ask the Board to review the campaign’s governance, editorial standards, and campaigning compliance; to provide a substantive written response within 28 days; and to confirm what corrective and preventative steps it will take.

Action Requested to Board

2. We write to you in your capacity as chair to raise a formal complaint about Friends of the Dales’ “Eyes on the Skies” campaign and, in particular, two webinars hosted and promoted by the Charity in January and February 2026.
3. One of these webinars, ‘Protecting Birds of Prey – Inside the Work of UK Wildlife Crime Policing’ is publicly available on [YouTube](#).
4. This letter is addressed to the Board because the issues we set out engage trustee-level duties under charity law and the Charity’s governing document. Our concern is not that the Charity should refrain from discussing wildlife crime or land management (both are legitimate subjects of public interest) but that the Charity appears to have used its platform in a way that may have resulted in:
 - 4.1. Material falling below reasonable standards of fairness, balance, and evidential caution expected where a charity presents contentious material as ‘education’
 - 4.2. Foreseeable risks of hostility, harassment, and community division affecting lawful rural workers, and

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- 4.3. Educational activity becoming too closely intertwined with political campaigning or lobbying, in a way that is difficult to reconcile with the Charity's stated independence.
5. We recognise that these are contentious issues on which reasonable people may disagree. Our concern is not with legitimate discussion itself, nor with the fact that the Charity may hold views on such matters, but with whether material presented as charitable education met appropriate standards of balance, fairness, evidential caution, and trustee oversight.
 - 5.1. We therefore ask the Board to take a clear, board-level decision to:
 - 5.1.1. Disclose the governance and approval process that was followed for the 'Eyes on the Skies' campaign, including the webinars, petition, and related messaging;
 - 5.1.2. Commission and oversee a formal review of the 'Eyes on the Skies' campaign content and governance;
 - 5.1.3. Issue a written outcome (including any corrections/clarifications, necessary apologies, and the steps you will take to prevent recurrence); and
 - 5.1.4. Implement concrete controls and a compliance framework for future public-facing 'educational' and campaigning activity (editorial standards, sign-off, corrections policy, and trustee oversight).
6. We set out below the areas of concern, the trustee duties engaged, and the practical remedies we seek.
 - 6.1. As set out in the Charity's Articles of Association, the Charity's Objects include promoting conservation and "the social and economic well-being of its local communities", and, in pursuance of those objects, advancing public education.
 - 6.2. Gamekeepers, estate workers, and those engaged in lawful moorland management are integral members of the Yorkshire Dales communities the Charity exists to serve. That is not merely an abstract point. Recent survey evidence records gamekeepers participating in school visits, charity events, local and regional shows, and other community activities, as well as hosting visits from conservation organisations, policymakers, and members of the public. For that reason, the Charity's governance should be especially alert to activities that unnecessarily stigmatise those local workers or contribute to hostility towards them.
 - 6.3. We also note the Charity Commission's core trustee duties (CC3), including acting in the charity's best interests, managing resources responsibly (including reputation), exercising reasonable care and skill, and ensuring accountability. In this context, the relevant question is not merely whether trustees supported the campaign in principle, but whether they can identify and, where appropriate, disclose what governance, editorial, and compliance steps were actually taken before contentious material was promoted through the Charity's platform, including any records, minutes, approvals, policies, or risk assessments relied upon.
7. Our concerns, elaborated below and supported by an evidence pack (Appendices A-D), are:

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- 7.1. **Educational integrity and standards of presentation.** The webinars contain statements presented with apparent authority which appear, in places, contested, incomplete, insufficiently caveated, or framed in a way that does not meet reasonable standards for charitable education on a contentious subject. In our view, the Charity did not apply adequate editorial controls, balance, moderation, or challenge.
- 7.2. **Due process and “naming” risks.** The webinars include the public identification of estates/individuals in connection with alleged criminality, in circumstances where (so far as we are aware) there were no charges or convictions supporting the implied conclusions being invited. That approach raises fairness and public detriment concerns, and is difficult to justify as public education.
- 7.3. **Educational/campaigning overlap and lobbying risk.** The second webinar appeared not only to serve an educational function, but also to provide a platform for campaigning activity, including promotion of a petition directed at a named government minister. That raises a material compliance and reputational question under the Charity Commission’s campaigning guidance (CC9), and is difficult to reconcile with the Charity’s stated independence.
- 7.4. **Governance and conflicts.** We understand the Executive Director is also a trustee and was publicly advancing campaign activity in the webinar. That is not inherently improper, but it heightens the need for demonstrable independent trustee scrutiny, conflict management, and clear sign-off.
- 7.5. **Community impact and risk of hostility.** The tone and content of parts of the webinars, including sweeping generalisations about “gamekeepers” as a group, risk increasing hostility and suspicion towards lawful rural workers. That concern is not merely theoretical. We return below to both wider evidence of occupational abuse and a reported Yorkshire Dales incident said to have been linked by a visitor to one of the Charity’s webinars.
- 7.6. For each of these concerns, we invite the Board to identify the process it followed, the standards it applied, the basis on which it concluded that the material was appropriate for publication in the Charity’s name, and the records supporting that conclusion.
8. **Detailed concerns.** The core issue, in our view, is not whether these topics may be discussed, nor whether the Charity is entitled to hold views on them, but whether it applied appropriate editorial controls, balance, moderation, and trustee oversight when presenting contentious material as charitable education. In practical terms, the Board should be able to explain, for each webinar and related campaign material: who approved it, what checks were carried out, what standards were applied, and how legal, reputational, and public detriment risks were assessed. We also ask the Board to state whether those matters were recorded contemporaneously in minutes, written approvals, briefing notes, or risk assessments.
9. We do not allege bad faith or improper personal motive on the part of trustees or staff; our concern is with the objective character of the material, the way it was presented, and the governance processes that appear to have accompanied it.

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10. For the avoidance of doubt, the points below are directed to governance, process and presentation. They are not intended to minimise the importance of tackling wildlife crime, but to question whether the Charity's approach met the standards expected of an educational charity.

11. Educational standards: fair presentation, balance, and evidential basis.

11.1. In the first webinar ('Protecting Birds of Prey – Inside the Work of UK Wildlife Crime Policing', 27th January 2026), Detective Inspector Mark Harrison made a number of strongly-worded and, in places, contestable claims. We recognise a serving police officer may speak candidly; however, the issue is the Charity's decision to platform and promote material presented as 'education' without apparent balancing context, challenge, or sufficient disclosure of uncertainty on points that are plainly contested. The corresponding governance question is: what editorial process was followed to test whether contested claims were being fairly presented, adequately caveated, and distinguished from proven fact? By way of example: (see Appendix A for full citations).

11.2. By way of example, the first webinar included strongly stated claims about organised criminality, satellite-tag disappearances, and investigatory inferences which were presented to the audience without sufficient caveat, methodological restraint, balancing context, or clear differentiation between evidence, hypothesis, and advocacy (see Appendix A, especially A1-A3).

11.3. Our point is not to deny the reality of wildlife crime, nor to argue that charities must avoid contentious subjects. It is that where a charity presents contentious material as education, it should take particular care to distinguish allegation from proof, evidence from inference, and advocacy from neutral explanation. Trustees should therefore be able to state what safeguards were in place to ensure that contested assertions were appropriately qualified and fairly contextualised before publication, and to identify where those safeguards were recorded or applied in practice.

12. Minimum standards the Board should be able to demonstrate were applied where contentious material was presented as educational content

In particular, the Board should be able to explain, and where possible evidence, how the Charity:

12.1. Distinguished allegation, suspicion, and proven fact;

12.2. Disclosed uncertainty and contested interpretations fairly;

12.3. Treated anonymous or unverifiable material with appropriate caution;

12.4. Moderated content so as to avoid sweeping generalisations about lawful groups, and

12.5. Provided a corrections, clarifications, or complaints route where needed.

13. Due process: naming of estates/individuals and implied condemnation

13.1. We are particularly concerned by instances where estates or individuals were identified, or could readily be inferred, in connection with alleged criminality in circumstances where the

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audience was invited to draw adverse conclusions without criminal charges or convictions supporting those implications (Appendix A, items A4-A5; Appendix B, items B3-B5).

13.2. This raises serious issues of fairness, due process, and public detriment. Even where the purpose is to discuss enforcement priorities or suspicious patterns, a charity presenting such material in an educational context should take particular care not to facilitate implied condemnation where the relevant evidential threshold has not been met. The Board should therefore be able to explain what protocol, if any, governed the naming of estates or individuals, what threshold had to be met before reputationally sensitive material was disseminated, who approved that approach, and whether that protocol or threshold was documented in any written policy, briefing, moderation note, or legal/compliance advice.

14. Community impact: public detriment and community cohesion concerns

14.1. In the second webinar, speakers made statements that repeatedly targeted “gamekeepers” as a community, in ways that risk encouraging unfair suspicion toward lawful rural workers and undermining community cohesion (Appendix B, especially B1-B2 and B6-B8).

14.2. Friends of the Dales is plainly entitled to discuss illegal persecution of birds of prey, which is a recognised wildlife-crime priority and a matter of legitimate public concern. Our point is not that such conduct should be ignored or minimised. It is that material presented as charitable education should distinguish carefully between evidenced incidents, proven offenders, and wider policy concerns on the one hand, and the wider body of lawful gamekeepers on the other. It should avoid language that may treat an entire profession as presumptively criminal, rely on guilt-by-association reasoning, or blur the distinction between criticism of unlawful conduct and condemnation of a wider lawful group.

14.3. Public campaigning on contentious issues carries a particular responsibility to avoid broad-brush attribution of criminality to occupational groups. That concern is not merely theoretical. It has already been raised publicly, in response to campaign rhetoric, that language describing gamekeepers in collective criminal terms risks inflaming hostility towards lawful individuals who have committed no offence. The governance question for the Board is therefore not simply whether the Charity intended to criticise wildlife crime, but whether it considered and recorded the risk that one-sided or insufficiently contextualised messaging might be understood as imputing criminality to gamekeepers as a class, and thereby aggravating hostility or unfair reputational harm.

14.4. This concern is not abstract. Material referenced at Appendix D indicates that gamekeepers may already face abuse, threats, and harassment connected with their occupation. More recent survey evidence reports that, across 58 English grouse moors, over 1,000 threats and over 1,500 insults were recorded in a 12-month period, and 30 keepers were physically assaulted. The same material reports financial and mental-health consequences for some keepers and records extensive public-facing and community roles undertaken by them, including educational visits, charity activity, and assistance to members of the public in distress. Whether or not trustees agreed with the campaign’s objectives, they should be able to show that they considered whether one-sided or insufficiently

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contextualised messaging risked exacerbating hostility towards a lawful local occupational group, and if so how that risk was assessed and recorded.

14.5. We have been informed of an incident this week in the Yorkshire Dales in which a gamekeeper carrying out routine moorland duties was reportedly subjected to verbal abuse, insults, and threats of violence after asking visitors to place a dog on a lead in breeding-bird territory. We are informed that one of the individuals involved stated that she had watched a Friends of the Dales webinar and described gamekeepers as “all evil criminals”. We do not put this forward as a concluded finding against the Charity, but as a further indication that trustees should have considered, and should now be able to explain, whether the tone, framing, and moderation of contentious public material risked aggravating hostility towards identifiable lawful local workers.

15. Campaigning/lobbying overlap and compliance risk

15.1. The second webinar did not, in our view, remain clearly educational in character. It also had the effect of promoting campaigning activity, including a petition calling for regulatory change and directed at a named government minister (Appendix C, items C1-C3).

15.2. Charities may campaign where doing so furthers their objects. However, the relevant compliance question here is whether trustees considered, and can now explain, whether sufficient separation was maintained between educational material, advocacy, and lobbying, and whether the Board expressly considered that boundary before publication and promotion of the webinar and petition.

16. Governance and trustee oversight.

16.1. We do not suggest wrongdoing or improper motive by that fact alone. However, the circumstances heighten the need for the Board to demonstrate independent oversight, conflict management, and a clear approval process. In particular, we ask the Board to identify whether the following existed at the relevant time, and if so in what form:

16.1.1. A record of trustee sign-off for campaign strategy, webinar content, and related messaging;

16.1.2. Documented editorial standards governing speakers, evidential claims, moderation, contextual balance, and the distinction between educational explanation and advocacy;

16.1.3. A conflict-of-interest process for circumstances in which a trustee was centrally involved in operational advocacy;

16.1.4. A recorded assessment of reputational, legal, and public detriment risks; and

16.1.5. A note or minute showing how the Board distinguished educational content from campaigning and lobbying activity.

16.2. Accordingly, we ask the Board to confirm, in terms, the governance process that led to the webinars and petition being approved, including: who approved them; when that approval

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was given; whether the matter went to the full Board, a committee, or individual officers; what editorial and moderation checks were applied; what legal, reputational, and public detriment risks were identified; whether any conflicts were declared or managed; whether any legal or compliance advice was sought; and how CC9 compliance was assessed.

16.3. If the Board disagrees with any material factual assertion in this letter, we ask that it identify the point specifically and explain the basis for that disagreement.

17. Remedies sought (specific, measurable, time-bound)

17.1. We would prefer constructive engagement and a practical resolution, focused on governance, clarification, fair contextualisation, and future compliance. We ask not only for the Board's conclusions, but also for a clear account of the process followed and the documents, policies, minutes, or approvals on which those conclusions are based. With that in mind, we ask the Board to provide a substantive written response and to take the following steps:

A) Within 7 days of receipt of this letter:

- 17.1.1. Confirm that the Board has opened a formal trustees' review and appointed a lead trustee (or independent person) to oversee it; and
- 17.1.2. Pending review, pause further promotion of the two webinar recordings and campaign materials, or add a clear interim notice stating that the content is under trustee review for fairness, balance, evidential presentation, and compliance.

B) Within 28 days of the date of this letter:

- 17.1.3. Provide a written response addressing each numbered concern and each appendix item relied upon, identifying for each material issue the relevant decision-maker, the process followed, any policy or protocol relied upon, any recorded risk assessment, any conflict declaration or management step, any legal or compliance advice sought or obtained, and any steps taken to distinguish criticism of proven offenders or evidenced incidents from statements capable of being understood as condemning lawful gamekeepers as a wider group.
- 17.1.4. Confirm whether minutes, written approvals, moderation notes, risk assessments, or policy documents exist relating to the webinars, petition, and associated campaign messaging, and identify them in summary form
- 17.1.5. Where appropriate, publish corrections, clarifications, balanced contextual notes, or moderated explanatory notes on the same platforms where the material was promoted, and
- 17.1.6. Where appropriate, issue an apology to any keepers or estates whose reputation may have been unfairly harmed by the promotion of unverified accusations.

C) Within 60 days:

- 17.1.7. Adopt and implement a short editorial and campaigning compliance policy covering evidence standards, moderation, corrections, trustee sign-off, and naming protocols.

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- 17.2. **Engagement.** Offer a properly chaired and minuted engagement meeting with relevant local stakeholders, including field sports and community representation, to help restore community confidence.

18. Going forward

- 18.1. We would prefer to resolve these concerns through constructive engagement rather than regulatory escalation.
- 18.2. However, absent a substantive response within 28 days, including a clear explanation of the governance, editorial, and compliance processes followed, we will consider referring the matter to the Charity Commission on the basis that it raises governance, compliance, and potential public detriment issues.
- 18.3. Our central concern is whether the Board can demonstrate that appropriate standards, safeguards, fair contextualisation, and trustee oversight were applied before contentious material was promoted in the Charity's name as educational content.
- 18.4. To assist the Board, we would be content for the response to address the matters above by reference to a numbered schedule dealing separately with each numbered concern and appendix item, and identifying the approvals, policies, minutes, risk assessments, and other materials relied upon.

We look forward to receiving your response. In the meantime, we reserve all legal rights.

Yours sincerely

Andrew Gilruth
Chief Executive
Moorland Association

agilruth@moorlandassociation.org

Attachments:

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The appendices below are provided not simply as examples of contentious wording, but as evidence relevant to the Board's review of its editorial standards, governance processes, and compliance decision-making.

- Appendix A:** Webinar 1 ('Protecting Birds of Prey – Inside the Work of UK Wildlife Crime Policing', 27 January 2026) – key claims by DI Mark Harrison, with verbatim quotations from the webinar transcript.
- Appendix B:** Webinar 2 ('Save Our Precious Sky Dancers', 18 February 2026) – key claims by Indy Greene, Adrian Rowe, and Ann Shadrake, with verbatim quotations from the webinar transcript.
- Appendix C:** Petition and campaign – the petition promoted during the second webinar and its stated objectives and parliamentary target.
- Appendix D:** Material referenced regarding harassment/abuse risk (including the gamekeeper survey cited above).

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APPENDIX A: Webinar 1 – ('Protecting Birds of Prey – Inside the Work of UK Wildlife Crime Policing', 27 January 2026) – key claims by DI Mark Harrison, with verbatim quotations from the webinar transcript.

Speaker: Detective Inspector Mark Harrison, UK National Wildlife Crime Unit

Source: Full transcript of "Eyes on the Skies" webinar, hosted by Friends of the Dales, January 2026.

The following verbatim quotations are drawn from the webinar transcript and are referenced in the body of this letter. Our concern in each case is not merely with the underlying view expressed, but with the absence of visible caveat, contextual balance, or editorial challenge in material presented as educational content.

A1. "Organised and deliberate" framing of bird of prey crime

DI Harrison described bird of prey crime using language associated with serious organised crime:

"these crimes I'm going to talk about now show intent, show that they're taking place. It's organized and it's deliberate, and a lot of it there's attempts to mislead the police, to destroy evidence and to do everything possible to avoid detection and being linked to a crime."

Concern: This language frames lawful rural communities in the same terms as serious organised crime networks, without the evidential basis to support such blanket characterisation. The Charity platformed and promoted these claims without scrutiny or challenge. The governance question arising is what scrutiny, challenge, or contextualisation the Charity applied before deciding to present this material as educational content.

A2. Magnet manipulation and vehicle transport of satellite tags

DI Harrison described alleged manipulation of satellite tags using magnets:

"So the use of a magnet. So these are live cases ... both have been reset with a magnet. So there's a way with these satellite tags that you can turn them on and off with a magnet ... Both of them are moved 15 or 16 kilometers away, and then the magnet was tweaked again to allow another transmission before then the tags just disappeared."

He further stated that the movement data indicated motorised transport was required:

"the movement of the SAT tag would have been would have required motorized transport to cover the distances identified in those timescales. And it would have had to have had the ability to be off road and cover them all in track, so most likely a pickup or a quad."

Concern: Whilst presented as data-led, these are hypotheses about active criminal investigations where no charges have been brought. The Charity presented these as established facts to a public audience.

A3. UK "unique globally" for tag disappearances; dismissal of tag failure concerns

DI Harrison made a sweeping claim about the UK's global position:

"these tags are designed to be used in conservation across the world. The UK is unique in the number of tags that we've had suddenly disappear and go missing. It done. You don't get these sort of figures anywhere else in the world."

Concern: This is a contested scientific and evidential issue. Satellite-tag data may be interpreted in different ways, and debate exists as to the extent to which disappearance can safely support an

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inference of illegal killing in any given case. Our concern is not that the webinar expressed one view, but that the Charity presented that view without visible acknowledgment of uncertainty or alternative interpretation, despite promoting the session as educational content.

A4. Eight “hotspot” estates identified; high-level visits to landowners

DI Harrison described a programme of identifying and visiting estates:

“we identified eight in total ... I go to each of those hot spots with local places on the team and present all of this data to them. We go in at that very high level to make sure that the owners, the people with responsibility, know what’s going on, and this enables us to apply pressure and to ask them to work with us and to make the crime stop.”

Concern: The public dissemination of this information, in circumstances where no charges have been brought, amounts to implied identification and condemnation of specific land holdings and their owners/employees. This creates an obvious risk of harassment or vigilantism.

A5. “This isn’t a passive request or a gentle request”

DI Harrison described the nature of these engagement visits:

“this isn’t a passive request or a gentle request. People don’t like what we’re telling them, and we do get challenged a lot. It can be quite uncomfortable at the start of these meetings.”

Concern: This language, platformed uncritically by the Charity, risks reinforcing a portrayal of moorland communities as obstructive and resistant to law enforcement.

A6. Fines described as “pathetic”

DI Harrison criticised the adequacy of current sentencing:

“it can be frustrating when you eventually get something to court and then you get a fine. That’s pathetic, to be honest with you.”

Concern: Whilst frustration with sentencing may be understandable, this is a politically sensitive statement from a serving police officer which the Charity chose to platform without challenge or context. The governance question arising is what scrutiny, challenge, or contextualisation the Charity applied before deciding to present this material as educational content.

A7. Financial investigators and proceeds of crime tactics

DI Harrison described plans to deploy financial investigation:

“if they’re committing crime in order to operate, and the gains they make are also criminal. So we’ve now got accredited financial investigators and Intel officers, and we are going to be pushing for more. We’re going to try and get some funding to make that a proper functioning economic crime unit.”

Concern: The deployment of financial investigators and proceeds-of-crime language carries a highly serious connotation. Our concern is not to deny that such tools may sometimes be considered by investigators, but that the Charity promoted this framing without visible contextual challenge or explanation of proportionality in material presented as educational.

A8. Covert surveillance, undercover operatives, and informant recruitment

DI Harrison revealed planned use of covert policing tactics:

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“We’re trying to utilize more techniques that have not been used much for wildlife crime, such as direct to surveillance, undercover recruitment, of covert human intelligence sources.”

Concern: These are among the most intrusive policing tactics available. The issue for present purposes is not whether such tactics may ever be lawful or justified, but whether the Charity presented them in an educational setting without sufficient contextual explanation, caveat, or proportionality.

A9. “Rage baiting” criticism of campaigners

DI Harrison criticised social media commentary:

“there’s a massive risk of misinformation and biased opinion. There’s a lot of rage baiting that goes on out there.”

Note: We include this for completeness. DI Harrison’s criticisms were directed at both sides of the debate, including conservation campaigners. This further underlines the one-sided nature of the Charity’s own framing of the webinar content. The governance question arising is what scrutiny, challenge, or contextualisation the Charity applied before deciding to present this material as educational content.

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APPENDIX B: Webinar 2 – ‘Save Our Precious Sky Dancers’, 18 February 2026

Speakers: Indy Greene (Co-chair, Hen Harrier Action), Adrian Rowe (Director and Trustee, Hen Harrier Action), and Ann Shadrake (Executive Director and Trustee, Friends of the Dales)

Source: Full transcript of “Eyes on the Skies” Webinar 2, hosted by Friends of the Dales, February 2026.

General observation: The second session appears more campaign-oriented in tone than the first. Speakers moved beyond general discussion into naming individuals or estates, recounting specific cases, and making broader inferences about gamekeepers and grouse moors.

B1. Greene: RSPB role framed as “getting gamekeepers prosecuted”

Mr Greene characterised the role of the RSPB investigations team as follows:

“[RSPB investigators are] based all the way across the United Kingdom, who do their best to gather data, try and wait and essentially get gamekeepers prosecuted for illegal activity.”

Concern: This characterises an entire professional community as presumptively criminal. It implies that the primary purpose of the RSPB investigations team is to target gamekeepers, rather than to investigate wildlife crime more broadly.

B2. Greene: “I would hate to tar all gamekeepers” – followed by sweeping condemnation

Mr Greene stated:

“I would hate to touch all gamekeepers with the same brush, because I know there are some fantastic, very conservation minded gamekeepers out there who would never dream of doing anything like this. But then, of course, there is the other side of gamekeepers who believe that you know any, any bird of prey, anything with a hooked beak, needs to go from their land. They believe that threatens their grouse or pheasants or Partridge stocks, and they believe it should go, which, of course, is completely illegal.”

Concern: The disclaimer at the start is immediately contradicted by the overall thrust of the presentation, which frames the gamekeeping profession as inherently associated with criminal behaviour.

B3. Rowe: The Dingwall case – naming estates and reading transcripts aloud

Mr Rowe named a specific estate and individual:

“Just a few weeks ago, as has already been mentioned, head gamekeeper from the Coniston and Grassington estate, Racster Dingwall, pleaded guilty to conspiring to kill a hen harrier. It was a landmark verdict for a number of reasons. It was the first successful conviction [of this kind].”

Mr Rowe then read directly from covert footage transcripts of a conversation between gamekeepers.

Concern: We acknowledge that a criminal conviction exists in this case. However, the manner of presentation (naming estates, reading transcripts aloud, and building a narrative designed to implicate the wider gamekeeping community) goes far beyond reporting a single criminal case. The Charity permitted its platform to be used in a way that risked inviting broader inferences from one individual

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conviction about a wider lawful profession. The governance question arising is what threshold, review process, or legal/public detriment assessment the Charity applied before permitting material capable of implying adverse conclusions about identifiable estates or individuals.

B4. Rowe: Sita – “very close to two large grouse shooting estates”

Mr Rowe linked a hen harrier disappearance to grouse moor proximity:

“Sita disappeared suddenly on the 27th of February last year, while at a winter roost between Reeth and Redmire in the Yorkshire Dales, very close to two large grouse shooting estates.”

Concern: This implies guilt by geographical proximity, without any evidential basis. It invites the audience to draw adverse inferences about specific estates. The governance question arising is what threshold, review process, or legal/public detriment assessment the Charity applied before permitting material capable of implying adverse conclusions about identifiable estates or individuals.

B5. Rowe: Cersei – “And before you ask, yes, she disappeared close to a grouse moor”

Mr Rowe stated:

“She had fledged from the Taras Valley nature reserve, and she was just four months old. And before you ask yes, she disappeared close to a grouse moor.”

Concern: This is, in our view, highly prejudicial. The phrasing “before you ask” invites the audience to accept grouse moor proximity as dispositive of illegal killing. The governance question arising is what threshold, review process, or legal/public detriment assessment the Charity applied before permitting material capable of implying adverse conclusions about identifiable estates or individuals.

B6. Rowe: Anonymous gamekeeper quotes from Guardian podcast

Mr Rowe relayed an anonymous and unverifiable account from a Guardian podcast (“Killing the Sky Dancer”):

“[The estate owner would] come back and then tell his gamekeeper: ‘Well, you know, I saw a pair of hen Harriers on my weekly walk through the estate, when I come back for my weekly walk next week, I don’t want to see them again.’ And it’s, you know, nothing’s written down. There’s nothing in the job description.”

Concern: This is unverifiable anonymous hearsay. The uncritical promotion of such material by a registered charity is inconsistent with the standards of accuracy and integrity expected under charity law and the Charity Commission’s guidance.

B7. Greene: Grouse moors described as “complete moorland desert”

Mr Greene characterised managed grouse moors:

“just more diversity of landscapes, rather than just a complete Moorland desert, which is what we’re seeing. So that also isn’t doing our birds of prey many favours, unfortunately.”

Concern: This is a strongly expressed and contestable characterisation of managed grouse moors. If the Charity wished to present such a view in an educational context, it should have ensured that alternative evidence and perspectives were also fairly acknowledged.

B8. Greene: Safety advice to raptor monitors – concealing activities on moorland

Mr Greene advised raptor monitors:

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"I'm not here to look for illegal activity. I'm looking I'm out bird watching, looking for birds of prey, though. Just keep it keep it cool. Keep it casual, because the last thing you want is any kind of conflict, whether that be obviously verbal or physical."

He further stated:

"[RSPB] investigations team themselves just by admitting their bird watching has happened. So yeah, prioritize your own safety."

Concern: This characterises the moorland environment, and by implication some of the people who work and live in it, as threatening or unsafe. That is difficult to reconcile with the Charity's object of promoting the social and economic well-being of local communities.

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APPENDIX C: Petition and Campaign Activity (February 2026)

The purpose of this appendix is not to suggest that charities may never advocate for policy change, but to identify features of the webinar and petition that, taken together, raise a question about whether sufficient separation was maintained between charitable education and live campaigning activity, and what the Board recorded or considered in relation to that boundary.

Source: Full transcript of “Eyes on the Skies” Webinar 2, hosted by Friends of the Dales, February 2026.

C1. Petition launch announcement by Ann Shadrake (Executive Director and Trustee)

During the second webinar, Ms Shadrake announced:

“there are also some reforms and things that only government can bring in. And I’m delighted to announce today that we’ve launched our first ever online petition, and Victoria will be sharing information about that in the chat, and that’s calling for reforms, such as creating a national database of these types of wildlife crime, having proper sentencing guidelines, and also calling for the licensing of the game bird industry.”

Concern: The petition was launched during a ‘charitable education’ webinar, using the webinar audience as the initial platform. The resulting governance question is whether trustees considered, in advance, whether launching a live petition of this kind altered the character of the event from education into advocacy or lobbying, and where that consideration was recorded.

C2. Named parliamentary target: Mary Craig, Parliamentary Under Secretary of State at Defra

Ms Shadrake specifically named the ministerial recipient:

“I really encourage you to think about signing that petition so that we’ve got a really strong voice behind us when we take it to Mary Craig, who’s the parliamentary Under Secretary for state at Defra.”

Concern: Naming a specific ministerial target in connection with a petition gives the activity a lobbying character. The corresponding compliance question is whether the Board considered that consequence, who made that assessment, and where its assessment of CC9 was recorded before the webinar was delivered.

C3. Campaign goals stated by Jonathan Riley (Chair of Trustees) in opening remarks

In his opening remarks to the first webinar, Mr Riley set out the campaign’s political objectives:

“we want to see better National Recording of wildlife crime, making these crimes notifiable ... Secondly, we’d like to see penalties strengthened for offenders ... And thirdly, we add our voice to that of others who are suggesting the need to regulate and license the game bird shooting industry.”

Mr Riley also announced:

“the next stage of our campaign where we’re looking to send an open letter to key politicians in government, and we’d love everyone to back this.”

Concern: This further indicates that the campaign had a significant advocacy and lobbying dimension. The governance question is whether trustees expressly considered how that dimension would be

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kept distinct from material presented as charitable education, and whether that distinction was reflected in any minute, briefing, or sign-off record.

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APPENDIX D: Evidence of Harassment and Abuse Risk

D1. Gamekeeper survey: abuse, threats, and harassment

A survey carried out jointly by BASC, the Countryside Alliance, the Game Farmers Association, and the National Gamekeepers Organisation in 2020 reported the following findings:

<https://basc.org.uk/gamekeeper-survey-reports-alarming-increase-in-abuse/>

- Nearly two thirds of the over 1,000 gamekeepers who responded reported that they had received abuse and/or threats because of their occupation.
- Significant numbers reported verbal abuse and intimidation, threats of criminal damage and arson, and theft.
- Abuse via social media channels is a rising issue, with 56% of respondents recording an increase in the number of incidents over the previous 12 months.
- Some gamekeepers reported that the pressure of being targeted for their job had directly led to the breakdown of personal relationships.

Relevance: This survey provides an evidence base demonstrating that anti-gamekeeping rhetoric has real-world consequences. It is against this established backdrop that the Charity's decision to platform highly contentious material should be assessed in that context. At a minimum, the campaign risks contributing to an already difficult environment for some lawful rural workers.

D2. Additional 2025 survey material: threats, insults, assaults, and wider community role

A further report published in 2025, based on survey material from 58 English grouse moors, records that over a 12-month period gamekeepers reported more than 1,000 threats, more than 1,500 insults, and 30 physical assaults. The same material also records financial loss and mental-health impacts for some keepers.

<https://www.regionalmoorlandgroups.com/research>

The relevance of this material is not to suggest that all criticism of gamekeeping is improper, nor to treat the report's wider conclusions as determinative. It is narrower. It provides further evidence that at least some gamekeepers already experience abuse, threats, and hostility connected with their occupation. Against that backdrop, trustees addressing contentious issues affecting identifiable local workers should be able to show that they considered whether one-sided, insufficiently contextualised, or inadequately moderated messaging might foreseeably aggravate hostility or unfair reputational harm.

D3. Community and public-facing role of gamekeepers

The same 2025 report also records that, over a typical year, keeper teams participated in school visits, charity events, local and regional shows, and other activities designed to explain their work and support local communities. It also records regular engagement with conservation, research, land-management, and other external organisations.

This is relevant because it underlines that gamekeepers are not a remote or abstract category, but form part of the communities with which the Charity itself is concerned. The governance question is

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therefore not limited to whether the Charity intended to criticise unlawful conduct. It is also whether trustees considered the possible effect of the Charity's language and platforming decisions on identifiable lawful workers, community cohesion, and the Charity's own obligation to promote the social and economic well-being of local communities.

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