



FAO: Andrew Gilruth, Chief Executive

The Moorland Association

Dalton House
9 Dalton Square
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Lancashire
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By email: agilruth@moorlandassociation.org

30 April 2026

Dear Mr Gilruth

Re: Formal Complaint regarding “Eyes on the Skies” campaign

We refer to your letter dated 20 March 2026.

We note that the letter is 19 pages long and that you have requested a substantive response ‘*including a clear explanation of the governance, editorial, and compliance processes followed*’ which you have suggested could be formatted in ‘*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*’.

As a charity, The Yorkshire Dales Society (Friends of the Dales) (the “**Charity**”) is not subject to The Freedom of Information Act 2000 or under any other legal obligation to disclose the information which you have requested. Moreover, it would not be appropriate for a charitable board to disclose internal documents and information relating to its decision-making in the manner you have proposed, nor would it be an appropriate or proportionate use of the Charity’s limited charitable resources to do so.

That said, your letter has been circulated to and considered by the board of trustees of the Charity, which takes matters of regulatory compliance and governance very seriously and, in the interests of transparency, we have commented below on the concerns summarised at paragraph 4 of your letter.

1. The aims of the Charity’s “Eyes on the Skies” campaign are to speak out against the ongoing criminal killing of birds of prey, raise awareness of how to report suspicious or illegal activity and push for legal reform in this area. Within its objects the Charity has charitable purposes to promote the conservation of the landscape and biodiversity. The campaign relates directly to biodiversity and, in particular, the protection of birds of prey, which are integral to ecological diversity in the Dales landscape. The board has adopted a rigorous approach to its decision-making in respect of the campaign and is satisfied that it furthers the Charity’s purposes and represents a proper and responsible use of charitable funds.

2. Charities are entitled to undertake campaigning activities (with a view to ensuring that existing laws are observed and also to call for changes in law, policy or practice) where these further their charitable purposes. There is no requirement to create a formal “separation” or a “boundary” between campaigning and other charitable activities, as your letter appears to suggest. The trustees are satisfied that the Charity’s campaign has been conducted in line with the relevant law, Charity Commission guidance and good governance practice.
3. Finally, the board rejects any suggestion that the Charity or those acting on its behalf have used the campaign’s platform in a manner which would foreseeably increase the risk of hostility, harassment and community division. In developing and delivering the “Eyes on the Skies” campaign, the Charity has worked with reputable subject matter experts, including the UK National Wildlife Crime Unit and the RSPB, to ensure that the information presented has drawn on recognised expertise and adopted an evidence-based approach.

We hope that this response addresses the concerns you have raised and trust it brings the matter to a close.

Yours sincerely,

Jonathan Riley

Chair of the Board of Trustees

The Yorkshire Dales Society