DSC Survey Analysis

Charging Charities fees for Regulation

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Summary of findings

- Over 95% of our sample oppose the introduction of Charity Commission fees
- Opposition from this sample is significantly higher than estimates from the Charity Commission
- Reasons for opposition fit broadly into four themes:
 - Fees would be a damaging burden on charitable resources
 - Fees are wrong in principle
 - Fees would lead to bad regulation
 - Fees would be poor value for money
- Supporters of the proposal warn that care is needed to ensure fees are not overly burdensome

1. Background to the survey

The idea that charities could fully or partially cover the costs of running the Charity Commission has been knocking around for a number of years, in large part as a proposed solution to severe cuts to the Commission's budget. In recent months we have seen this issue brought to the fore with the Charity Commission giving clear indications of its intention to introduce fees in the near future.

In June 2015 a report commissioned by the regulator found that over two thirds of the public favour the introduction of fees, compared to a quarter of charities. The report, <u>Trust and Confidence in the Charity Commission</u>, by polling company Populus, measures attitudes among the public and the charity sector towards a number of regulatory issues, including the assumption of greater powers for the Charity Commission. DSC criticised the design of a number of key questions and pointed out that they produced biased results.

Five years ago DSC sought to informally measure support for the idea of regulatory fees being charged to charities. Responding to the Commission's report and the questions around its findings, DSC issued an identical survey to see how it compares to the Commission's findings and how, if at all, opinion may have changed.

2. Methodology

2.1 Details of the survey

We distributed a two-part questionnaire which was similar to the survey issued five years previously. The first part consisted of a single question, to which the respondent could only answer *yes* or *no*, which asked:

"New research by the Charity Commission asked charities and the public for their views on whether the Commission should be funded by general taxation (as it is now, which their survey did not make clear) or if charities should be charged to support the regulator. What we want to know is, should the Charity Commission charge fees to charities?"

The second part invited respondents to use a comments box to explain their response in more detail and this was optional. This was phrased as follows:

"In the comments section you may wish to elaborate!"

2.2. Distribution and responses

The survey was built using the online resource SurveyMonkey and was disseminated through DSC's e-newsletter and social media, including DSC's Twitter account and associated twitter accounts. The survey was restricted to one response per IP address, minimising the likelihood of a person submitting multiple responses. The survey was opened on Friday 26 June, a day after the Commission's report, and was closed on 20 July.

In the 25 days that the survey was open, it was completed by **167 individual respondents**. Of these, **79 (47%)** responded to the second part by providing a written response expanding on their answer to part one. This is a high ratio of written to total responses for one of our surveys.

2.3. Thematic analysis

We feel that the big value in the survey lies in the written responses we have received. We have found them to be highly passionate and well thought-out. An initial overview of these comments was undertaken to identify different running themes. The frequency of these themes was then counted to reveal which issues arise most. These themes were then explored in detail and from that some recommendations were drawn. A selection of direct quotes is provided. The complete list of comments is provided in the appendix.

It should be noted that some individual responses may appeal to more than one theme and therefore the number of recurring themes may be greater or lesser than that total number of respondents. As is inherent in working with free-form written responses, some interpretation was needed to fully capture the relevant themes.

2.4. Relevance to policy making

The survey was not intended to be scientifically robust. Rather, it is meant to be a measure of people's feelings about the issue of regulatory fees and to shed light on this issue. We acknowledge that our sample size of 167 falls far short of statistical significance, and the demographic of our respondents is weighted towards people with an interest in charities whether as an employee, volunteer or other supporter. It is not a scientific poll of public opinion in the charity sector but represents the views of DSC's constituency - which mainly comprises staff, volunteers and trustees involved with small and medium-sized charities (we do not have members).

Notwithstanding these, we feel the survey has tremendous value as a barometer of opinion towards the Commission's proposals and should be read alongside the Commission's own report which finds substantially higher levels of support to charging among charity representatives. This is an additional assessment of 'stakeholder opinion' which we feel

needs to be balanced against the conclusions made by Populus on behalf of the Commission, about charging fees to charities.

We feel that the themes arising from the comments discussed in this paper should be considered carefully by the Commission when considering whether or not to introduce fees.

3. Results

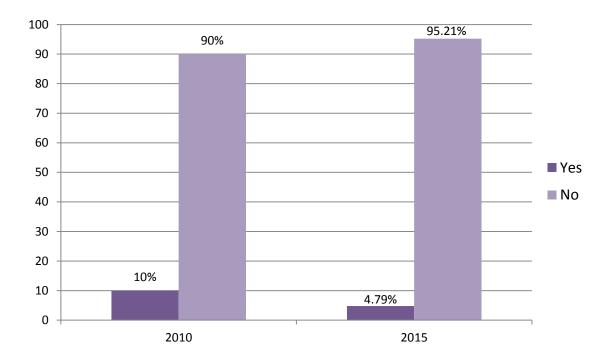
Question 1:

"New research by the Charity Commission asked charities and the public for their views on whether the Commission should be funded by general taxation (as it is now, which their survey did not make clear) or if charities should be charged to support the regulator. What we want to know is, should the Charity Commission charge fees to charities?"

Of 167 responses, eight people (4.79%) believe charities should be charged fees to support the regulator, while 158 people (95.21%) believe that they should not. This is in stark contrast to the findings of the Populus report which found that 23% of people representing charities were in favour.

Comparing our findings to our previous survey in 2010 we see that opposition towards the idea of charging regulatory fees to charities has actually increased (note however this is not a cohort sample but randomly self-selected).

Figure 1: Survey result: Should the Charity Commission charge fees to charities?



4. Analysis

Question 2:

"In the comments section you may wish to elaborate!"

4.1. Overview:

In our experience it is very rare that such a high number of respondents (79) opt to give a written response to a survey, as a proportion of the total repondents. One comment (#46) was excluded because it did not appear to relate to the issue at hand. The volume of written responses (47% of the total number of respondents) reflects how strongly people feel about this issue. Broadly, five themes can be identified as running throughout the responses and these are elaborated upon, quoting directly from the responses.

There appears to be a large amount of opposition to the introduction of fees. The responses have described the proposal as "a naïve view" (#4), "Outrageous!" (#31,#74), "ridiculous" (#20,28), "...a cheek" (#53), "unfair" (#4), "daft" (#32), and "an insult" (#69). Some have questioned the basis of the Charity Commission's report into this matter with one person saying "Their statistics have always been sketchy at best" (#73).

Unfortunately, only two of the eight respondents to answer "yes" to the first question provided a written answer to the second question. Both of these however made the point that controls should be in place so that any fees would not to be overly burdensome to charities with fewer spare funds as is illustrated in part 4 below.

Theme	Response number	Frequency
1. Fees as a damaging	#1,#6,#11,#12,#13,#14,#16,#19,#21,#23.#25,#34,	34
burden on charitable	#36,#37,#38,#39,#43,#44,#47,#48,#49,#53,#55,#5	
resources	9,#60,#61,#65,#67,#69,#71,#72,#75,#76,#77,#79	
2. Fees as wrong in	#2,#8,#9,#16,#17,#18,#27,#28,#31,#34,#35,#37,#	28
principle	40,#41,#45,#48,#50,#53,#56,#57,#59,	
	#62,#66,#69,#70,#74,#78,#79	
3. Fees as bad regulation	#4,#5,#7,#14,#22,#23,#26,#30,#54,#58,#64,#73,	11
4. Fees require the right	#3,#29,#32,33	4
controls		
5. Fees as poor value for	#4,#10,#20,#62,	4
money		

Figure 2: Responses and themes

4.2. Theme 1: Fees as a damaging burden on charitable resources

Of the 79 people to give written responses, 34 people (43%) oppose the proposal because they believe the introduction of fees will be too great a burden on charities' resources with highly negative consequences for beneficiaries. These resources are predominantly financial, reflecting the difficulties most charities face raising funds, with great concern for the situation of smaller charities. Apart from the financial burden, there is concern that this will create a greater administrative burden as well.

"Many charities are struggling to exist" (#11)

"...charities simply cannot afford it." (#14)

"We cannot afford more expenditure" (#12)

"There is also every likelihood that this would lead to increased bureaucracy and more onerous regulations" (#69)

"This would be yet another expense that small charities would have to find extra income for, are they trying to close us down?" (#36)

"Our charity is new and struggling. It would be terrible to charge us" (#79)

Respondents have directly expressed concern that the reduced income resulting from regulatory fees, will have a direct and negative impact on their beneficiaries.

"It would be another expense a small charity would have to pay... We would struggle to be able to support our beneficiaries" (#1)

"It is hard enough to raise money for the work we do- expenses like this take funding away from the children we help". (#60)

"We want as much of our funds to go to helping disadvantaged people, this will just add to out running costs and will benefit nobody" (#19)

Many also see the burden on charity finances going beyond the need to meet regulatory costs and raise concerns that the introduction of fees will damage public trust and confidence in charities resulting in even greater challenges to charities' ability to fundraise. This relates to issues around what the public want their donations to go towards and a perception among the public that charities spend too much on "overheads" and not enough on direct charitable services.

"Any of the public who are sceptical about the... integrity and probity of any charity would be further turned against them if they know the so-called regulatory body was funded by those same charities [see quote on Independent Press Complaints Commission]." (#54).

"It would be an insult for charities to pay for the regulations [sic]... many would dissolve and the public would be reluctant to continue charitable giving". (#69)

4.3. Theme 2: fees as wrong in principle

The second most recurring theme, occurring 27 times, is that the Commission should continue to be state-funded as a matter of principle. A significant number of respondents are of this view because they see the work of charities as benefiting all people in society and not just charity beneficiaries. There is a prevailing opinion, therefore, that as it is for the public benefit that charities are properly regulated, that the general public should have a stake in the Charity Commission and continue to pay for regulation through taxation.

"It is in the interest of everyone that charities are regulated, so everyone taxpayer [sic] should pay." (#8)

"Charities operate in the public interest and if David Cameron is still interested in the Big Society... his government should be continuing to fund the Charity Commission from the public purse..." (#40).

"Charities must provide public benefit and so it seems just that the public (via taxation) should fund the regulator" (#56)

"Charities offer invaluable services to the local community which are of public benefit and should be paid by the public" (#66)

Related to this there is the view that because charities are not profit making, their funds should not be used to pay for regulation. There is the view that forcing charities to pay for regulation would be a misappropriation of funds given for the purpose of charity, and that this amounts to a tax on charitable giving. It is also seen as a form of double taxation on taxpayers who choose also to donate to charity.

"Unlike other sectors money to pay these fees comes not from profits but from resources which should be sent on to beneficiaries." (#2).

"This is not what donations are given to pay for." (#9).

"The taxpayer already pays for this. Surely it should have been made clear [in the Commission's Populus survey] that they will be doing so twice." (#27).

"Tax payers already pay tax on their income. Money given to charities to do essential work should not be subject to paying for government regulation". (#59).

"The collection of fees... cost to the taxpayer who are the same people paying for charitable activities." (#62)

Other views arising from the principle argument is that charities should not have to pay for their own regulation because they are 'filling in' for the state. It arises that, as charities are not profit making and are filling in the gaps left by government, charging charities is unfair. There is a view that charging for regulation would be an abuse of charities' funds and those who work for them, most of whom do so on a voluntary basis.

"Charities are already picking up much of the slack from Government cuts. To charge for regulation would be ridiculous" (#28).

"Charities are not for profit, so why should the regulator make a profit from them?" (#35).

"The government is requiring more and more of the Third Sector... and therefore the government should be the ones to fund this..." (#48)

"What a cheek!! The charity sector mops up the debris left by inadequate government help to needy folk and wants to charge us for doing it." (#53)

"What an outrage. We work as volunteers and without us the nation and other countries would be in a much worse position." (#74)

"So many charities have tried to fill the gaps caused by government cutbacks. We struggle for every penny nowadays" (#79)

4.4. Theme 3: fees as bad regulation

Eleven respondents expressed concern that the introduction of fees will lead to bad regulation. This concern is centred largely on the relationship between the sector and the regulator and the need for the regulator to be independent. It is believed that by relying on charities for part of its income, the Charity Commission's impartiality will be undermined.

"... in no way likely to make the Charity Commission more politically independent." (#4)

"If funded by charities there is a danger that larger charities will insist on a larger 'say'... if paid for by charities [the charity commission] cannot be truly independent" (#22).

"... surely having charities support the regulator will compromise the independence of the Charity Commission." (#23).

"Money passing hands does not make for objective regulation relationship [sic]" (#26).

"The Charity Commission needs to maintain its independence... this would be diminished if there was a charge to charities." (#30).

"Regulators regulating those who pay for them is a disaster" (#64)

"...you wouldn't want to bite the hand that feeds you." (#73).

There is also concern that if the Charity Commission cannot be seen as fully independent there will be negative consequences for public trust and confidence in charities.

"... look at what has happened to the so called Independent Press Complaints Commission that is perceive [sic] to be controlled by its biggest funders in the press." (#54).

4.5. Theme 4: fees require the right controls

Four respondents had a view on controls that would need to be in place should fees be introduced. Two respondents who answered "yes" to the first question gave a written response to the second question. Both of these stressed the importance that fees are designed so as not to be overly burdensome on smaller charities and charities with less available funds. There is some concern that the raising of funds in this way could be seen as a replacement for statutory funding.

"Yes, but it needs to be proportionate and not overly burdensome on small charities" (#3)

"...such charges should be banded and relate to the size of the charity... any money raised should not be seen as an excuse by government to reduce its contribution" (#29)

Two respondents, who answered "no" to the first question, nonetheless recommended that if fees are to be introduced they must be done so in a way which will not place an undue burden on the resources of charities.

"There may be a case for larger charities to pay fees but as most charities... have an income of less than £100K (huge numbers much less than that) then it is daft to add another cost to our work" (#32)

"If we must pay fees, it should be proportionate to income. 0.001% would be ok. If we have a turnover of £100k we would pay £10[sic]" (#33)

4.6. Theme 5: fees as poor value for money

Four respondents have suggested that the costs of collecting fees will render the idea futile, not resulting in the level of income required by the Commission to have a more sustainable funding model.

"Inefficient, ineffective, unfair..." (#4)

"...charging at acceptable level surely not going to raise enough to counterbalance reasons against it" (#10)

"Cost of collection will make the fees higher than the present cost to the taxpayer...
very expensive job creation scheme" (#62)

5. Conclusions and Recommendations

5.1. Summary of emerging themes

The central lesson and recommendation to come out of this survey is that the Charity Commission should not introduce any fees for the regulation of charities. The number of arguments against the introduction of fees are many, as illustrated by this analysis, and the arguments in favour are almost non-existent, with positive responses consistently given with caveats and qualifications.

Amongst the respondents to our survey there is clearly overwhelming opposition to the introduction of fees by the Commission. The main reason for this is that it would reduce the financial resources of charities significantly, while imposing administrative burdens, and it would have a negative impact on their ability to provide services. There is also concern for the impact of fees on public opinion and the future ability of charities to fundraise.

Also high up in people's concerns is that charging charities is wrong in principle, on at least three levels: because charities work for the public benefit, because they do not operate for profit, and because they are (often) filling in gaps in service provision left by the state.

Lower down in people's concerns is that charging fees will lead to a problematic relationship between the Charity Commission and the charities it regulates, and the impact this would have on the public's perception of the Commission's independence and therefore the extent to which charities are well regulated.

Finally, there is scepticism that charging fees to charities would represent value for money, as some suspect the cost of collection and enforcement would make any potential income negligible.

5.2. Considerations for the Commission's strategic objectives in light of this survey

The themes that have been explored in this report give rise to multiple issues which relate directly to the Charity Commission's strategic objectives. Concerns have been raised under the above themes which would suggest that the introduction of fees would be at odds with these. The Commission needs to consider carefully the impact fees would have on its ability to realise its objectives.

• The public trust objective: The Commission has the objective to increase public trust and confidence in charities. Concerns have been raised that the introduction of fees would promote a negative public perception that charities spend too much on overheads and not enough on direct services. This could damage public confidence in the long-term with implications for future fundraising. Relatedly there is the issue that the public may perceive the Commission as not being sufficiently independent

from those it regulates. The public could lose confidence in the regulation of charities and will be less willing to give as a result.

- The public benefit objective: The Commission has the objective to promote awareness of the public benefit requirement. Would using donated funds to support a public body demonstrate the public benefit of charity? The Commission needs to consider the contradiction that this report has identified between the promotion of public benefit on the one hand, and the diversion of public donations towards funding regulation on the other.
- The compliance objective: The Commission has the objective of promoting the compliance of charity trustees with their legal obligations. It has been suggested that the introduction of fees would create a problematic relationship between charities and the regulator. This is because people believe the independence of the regulator is key to promoting compliance, and if the regulator is dependent on charities for its funding its independence will be compromised. Furthermore the introduction of fees is seen as a financial and administrative barrier to charities doing what they need to do. The Commission needs to consider the effect this barrier may have on the ability of charities to be fully compliant.
- The charitable purposes objective: The Commission has the objective of promoting the effective use of charitable resources. For charities to be effective it is important that there is a well-resourced regulator. Many respondents however are of the view that paying for regulation would not be the correct use of charitable resources. It is clearly a principled issue as people feel that charities' resources should not be diverted from their charitable purpose (the purpose for which people have given) in order to fund the regulator's budget, which many have argued should continue to be the responsibility of the taxpayer, again on a matter of principle.

5.3. Other Considerations

If the Charity Commission proceeds to introduce fees there are some points emerging from this report that they need to consider:

Banding charities: It should be noted that having a bigger income is not necessarily
an indicator of a charity's ability to pay additional fees without negatively impacting
on services. Small charities as well as larger ones often plough their whole yearly
income into services with little flexibility or margin. Introducing fees above the

£100k income level would still bring over 31,200 charities – about 20% of the register - into a charging scheme.

- Independence and objectivity: if the Commission introduces fees it is likely that charities would push for greater involvement and say in how the Commission is run generally, the quality of its services, and its governance and they would in our view be highly justified in doing so. Larger charities, by virtue of their greater resources and increased likelihood of having to pay (or to pay more), would perhaps have the strongest influence, raising concerns over fairness.
- Public opinion as we have pointed out, the polling question by Populus on this
 issue neglected to inform respondents of the current reality that the Commission
 has always been funded by general taxation and that changing this is a major shift
 in the relationship between charities and their regulator. The issue of the taxpayer
 'paying twice' i.e. by taxation and because a proportion of public donations would
 go to fund regulation remains unaddressed in the public consciousness.
- Fairness for all stakeholders: This report finds a strong emphasis on the need for a fair deal for taxpayers who also give to charity. However it is important to realise early on that the "taxpayer" is not the only relevant stakeholder. A fair deal must be ensured for all supporters of charities, including companies and the non-taxpaying public. Furthermore, the fairness of any fee-paying regime for those who give inkind, including volunteers, must be considered.

About the Directory of Social Change

The Directory of Social Change (DSC) has a vision of an independent voluntary sector at the heart of social change. We believe that the activities of charities and other voluntary organisations are crucial to the health of our society.

Through our publications, courses and conferences, we come in contact with thousands of organisations each year. The majority are small to medium-sized, rely on volunteers and are constantly struggling to maintain and improve the services they provide. We are not a membership body. Our public commentary and the policy positions we take are based on clear principles, and are informed by the contact we have with these organisations.

We also undertake campaigns on issues that affect them or which evolve out of our research. We view our role as that of a 'concerned citizen', acting as a champion on behalf of the voluntary sector in its widest sense. We ask critical questions, challenge the prevailing view, and try to promote debate on issues we consider to be important.

Appendix: Complete list of written responses

#	Response
1	It would be another expense a small charity would have to pay. When tin collections and
	events is the only way to fund raise with very little coming from Trust Boards. We would
	struggle to be able to support our beneficiaries.
2	Unlike other sectors money to pay these fees comes not from profits but from the resources
_	which should be sent on beneficaries. Reg should be funded as a matter of principal by
	goverent as a way of ensuring public benefit.
3	Yes, but it needs to be proportionate and not overly burdensome on small charities (Voted
	yes to Q1)
4	Inefficient, ineffective, unfair and in no way likely to make the Charity Commission more
	politically independent. A very naive view.
5	Arms length regulation is seen as a better safeguard the internally funded inspections which
	could be claimed to have bias. [name deleted for anonymity]
6	Charities should reduce their cost base as much as possible and not increase it. Whilst
	regulation is needed it should be paid for from Government funds ie general taxation
7	The relationship will change with the commission and there would be conflicts of interests.
, ,	£100,000 is too low to start charging. Would it be sensible to charge a charity with one or
	two employees the same as a national or international charity with turnovers of millions
	and are far more complicated and more damaging to the public view of charities if they are
	found to be doing the wrong thing or have poor governance, on the other had a small local
	operation (not a household name) on £100,000 is unlikely to even make the headlines.
	operation (not a nousenota name) on 2200,000 is animely to even make the negatives.
	I think that Charities Commission needs to cut costs and learn to work smarter.
8	It is in the interest of everyone that charities are regulated, so everyone taxpayer should
	pay.
9	This is not what donations to charities are given to pay for.
10	The funding level required before application is a better weeded out of numbers surely than
	charging. And charging at acceptable level surely not going to raise enough to
	counterbalance reasons against.
11	Many charities are struggling to exist and can barely afford the right competencies to match
	skills requirement. when they can its a struggle to afford it
12	Charities are already suffering hardship as a result of public sector funding retraction and
	the taile end of the recession. We cannot afford more expenditure.
13	Disproportionate regressive impact on small charities, diverting scant resources from
	beneficiaries to upkeep of Shawcross etc. At least smaller charity exemption.
14	Having not seen this survey when it went around I cannot comment on how things were
	phrased but for charities to pay their own regulator seems madness. It is important that the
	regulator is an independent body. Also charities simply cannot afford it.
15	Unable to answer questions now; too many companies jumping onto the charity
	bandwagon forcing charities to accept services they do not want which they say are free but
	bandwagon forcing charities to accept services they do not want which they say are free but in reality are not. Money is kept in company's bank accounts unless charities agree to their
16	
1	in reality are not. Money is kept in company's bank accounts unless charities agree to their terms and conditions. Charity Commission does not want to know. We totally support the DSC's view that charging, in addition to the additional financial
	in reality are not. Money is kept in company's bank accounts unless charities agree to their terms and conditions. Charity Commission does not want to know.
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17	in reality are not. Money is kept in company's bank accounts unless charities agree to their terms and conditions. Charity Commission does not want to know. We totally support the DSC's view that charging, in addition to the additional financial burden this would place on charities, would be shoring up gaps left by government cuts. Charities are non profit making, and any money they have to pay to the charities
17	in reality are not. Money is kept in company's bank accounts unless charities agree to their terms and conditions. Charity Commission does not want to know. We totally support the DSC's view that charging, in addition to the additional financial burden this would place on charities, would be shoring up gaps left by government cuts.

10	Pagulation should not be sharged to sharities!
18	Regulation should not be charged to charities!
19	We want as much of our funds as possible to go to helping disadvantaged people, this will
	just add to our running costs and will benefit nobody.
20	Ridiculous - this will force groups into legal structures that may not be most suitable
21	The Government has already robbed the charities to fund the Olympics and deprived
	Charities of this cash from the Lottery. If the Treasury decide not to fund the Charity
	Commission, the Charity Commission should act like all charities do and find someone else
	to fund them or reduce their costs b ut not charge charities.
22	If the Commission charges this will mean less for charitable causes and the risk that some
	smaller charities will 'go underground' to avoid paying. How many respondents really
	understood the question being asked if it wasn't made clear that current costs were funded
	by the general taxation. If funded by charities there is a danger that larger charities would
	insist on a larger 'say' as they would no doubt be paying more. The key role of the Charity
	Commission is to be a regulatory body - 'a policeman' and if paid for by charities it cannot be
	be truly independent.
	be daily macpendent.
23	Aside from the fact that charities are already struggling to cover their core costs in a tough
	funding environment and government cuts, surely having charities support the regulator will
	compromise the independence of the Charity Commission?
24	Just no
25	It is much better for our charity to focus all our funds and energies on the aim of the charity
	and for the benefit of the people we help rather than spending time fund raising so we can
	pay the charities commission to regulate us! Not a good use of our time and effort!
26	
26	Money passing hands does not make for an objective regulation relationship!
27	The taxpayer already pays for this. Surely it should have been made clear that they will be
	doing so twice!!
28	Charities are already picking up much of the slack from Government cuts. To charge for
	regulation would be ridiculous.
29	As a Treasurer [of a charity, edited for anonymity] my yes vote is subject to the following
	caviats:
	1. A charge to charities could be made when submitting their annual return (similar to that
	charged by Companies House for Companies Limited by Guarantee). Such charges should be
	banded and relate to the size of the charity (starting at say £25 going up to say £250).
	2. Applicants wishing to register a charity could be charged a modest sum (no more than
	£250) to pay for the registration process.
	3. Any money raised should NOT be seen as an excuse by government to reduce its
	contribution! (Voted Yes to Q1)
30	The Charity Commission needs to maintain its independence, and its regulatory role. This
	would be diminished if there was a charge to charities.
31	Outrageous! Our government needs to serve the people who elected them with a greater
	emphasis on serving the poor. only the poor need charitable assistance - the wealthier tend
	to pay for what they want. xx
	p-7
32	There may be a case for larger charities to pay fees but as most charities in England and
	Wales have an income of less than £100k (huge numbers much less than that) then it is daft
	to add another cost to our work.
33	If we must pay fees, it should be proportionate to income. 0.001 % would be ok. We have a
	turnover of £100k so we'd pay £10.
24	···
34	As all charities with an income of over £5,000 have to register with the Charity Commission

_	
	it seems unfair to ask them to pay for something which is compulsory. If there has to be a
	charge I would expect it to be based on income so that it does not penalise smaller charities.
	At a time when the public expects charities to spend all of their income on projects (as
	opposed to salaries, admin etc) it could be damaging to add in an extra cost which will not
	go directly to charitable purposes.
35	Charities are not for profit, so why should their regulator make a profit from them? charities
	would need to fundraise to pay the regulator!!
36	This would be yet another expense that small charities would have to find extra income for,
	are they trying to close organisations down? as it is we are not able to claim back VAT (only
	on medical equipment).
37	Small charities will suffer more than the bigger ones. Why should charities subsidise the
	regulator when they are finding it hard to raise sufficient funds for their own causes? The
	effect will be to reduce some charities effectiveness in what they do.
38	Charities are already finding it difficult to conduct the work they do under constant financial
	pressure. Charging a fee would impact greatly on smaller charities. I am not sure of the value
	of the commission anyway
39	charities are already heavily criticised for not spending more of donations directly on their
	cause, donors give their hard earned cash, which they have already paid taxes on, to help
	good causes - this would be another disincentive to potential donors.
40	Charities operate in the public interest and if David Cameron is still interested in The Big
	Society, which seems questionable, his government should be continuing to fund the Charity
	Commission from the public purse as part of that Society.
41	Why on earth should we pay the salaries of incompetent bureaucrats who know nothing
	about charities - this is immoral!!
42	strongly disagree
43	Small charities already struggle to pay subscription fees. Charging for access to the Charity
	Commission will further limit their funding research options and push down success rates.
44	Because of the turnover of the majority of charities (ie small) it would be difficult &
	expensive to operate. This proportionality suggests based on operating costs it could not
	raise a substantial amount of money!
45	This is a regulatory requirement, and should be padi for by those who set the regulations,
	i.e. govnt.
46	CC is an abbreviation for Chocolate Chip-pan.
47	Already paid for by taxpayers and most charities struggling with funding already.
48	The government is requiring more and more of the Third sector (many thousands of unpaid
	volunteers) and therefore the government should be the ones to fund this taxation for the
	Charity Commission. Charities are non profit making and many usually only have 1 or 2 paid
	staff, and whilst some of the larger charities have many more funded staff this it is to
	manage the size of the volunteers working in the organization and usually around the world.
49	Charities are struggling to survive with a government obsessed by cuts in services and the
	voluntary sector having to pick up the pieces. We already have to pay for VAT on everything.
50	There might be a case for large charities that pay high levels of remuneration being
	regulated by a paid body, but not a one size fits all blanket fee charging regime, even on a
	sliding scale as it would lead to wrongful use of charitable money
51	Especially not to those charities that run on volunteers only, so that 100% of their funds go
	to their projects and programs.
52	A lot of charities won't register so won't access funding and yet again only the larger
	charities will prosper.

	Also what's the point of gift aiding just to give it back again
F2	Also what's the point of gift aiding, just to give it back again.
53	what a cheek !! The charity sector mops up the debris left by inadequate government help
	to needy folk and wants to charge us for doing it. Hey government if you nwant to save
F.4	money, just sack the guys with these disconnected brains
54	any of the public who are sceptical about the independence, integrity or probity of any
	charity would be further turned against them if they knew the so called regulatory body was
	funded by those same charities, look at what has happened to the public trust in the so
	called Independent Press Complaints Commission that is perceive to be controlled by its
	biggest funders in the press
55	Charities are already struggling to survive. Thousands of charities and informal charitable
	groups have already disappeared. This is just another BIG SOCIETY burst balloon!!
56	Charities must provide public benefit and so it seems just that the public (via taxation)
	should fund the regulator. A fraction of a penny on income tax would be adequate, but
	politically unacceptable.
57	Tax payers already pay tax on their income. Money given to charities to do essential work
	should not be subject to paying for government regulation. It is tantamount to the
	beneficiaries of the charitable work paying tax which is a gross injustice.
58	Charities have no control over the charity commission. He who pays the piper calls the tune
	not the other way round
59	Charities exist mainly to help the people or communities who need the service but cannot
	afford to pay for it themselves, nor can they find the help within the current government.
	Hence, charities are not only helping the needy, they are also providing a service to the
	government. Therefore, not only that the Charity Commission should not charge charities,
	the government should on the contrary consider paying for the charitable services.
60	As the CEO of a small charity - it is hard enought to raise money for the work we do -
	expenses like this take funding away from the children we help.
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charities are already stretched to deliver services, many of which should be statutory and funded by government. Funding to charities by central and local government has been so greatly reduced in recent years that the landscape is almost unrecognisable - it would be an insult for charities to be charged to pay for the regulations of the charity commission, many would dissolve and the public would be reluctant to continue charitable giving. Charity money should be spent delivering their charitable aims - end of story. It is hard enough to raise funds! 70 Charities raise money to do their work, not pay the regulator. 71 We're hearing about funding cuts for charities and beneficiaries on a daily basis. Don't dump 72 extra costs on charities please! 73 The Charity Commission has recently come out with the vague lines that they are not in place to be 'friends' with charities but will take a hard stance against them and yet seem to want these charities to fund them, seems like you wouldnt want to bite the hand that would see fit feeds you. Also who is the CC surveying when they come up with their 69% of the public, in relation to HOW many that they actually interviewed. Their statistics have always been sketchy at best. what an outrage. We work as volunteers and without us the nation and other countries would be in a much worse position The number of Charities losing or having reductions in their funding is increasing each year 75 and raising funds is becoming more difficult. The Charity Commission should not charge 76 We are a very small charity and are finding it difficult now to raise funds to deliver our charitable objects. If we have to pay the commission for its services it will only increase the financial burden. 77 Charities on the lower income levels cannot afford it. Maybe the charities whose CEO's are paid hundreds of thousands could pay it? This is a function of Government and should be paid for from public funds, not reduce the 78 amount available for charitable purposes (submitted by email due to technical problem) Our charity is new and struggling. It would be terrible to charge us for regulation, so I am definitely opposed. So many charities have tried to fill the gaps caused by government cutbacks. We struggle for every penny nowadays. People just aren't giving, at least not to us, and they aren't volunteering any more either. Most of the time I feel like a one-man band and it's really hard to keep going.