**HMRC Consultation on Charity Tax Compliance**

**Joint Response by Charity Sector bodies**

**17 July 2023**

**Introduction**

1. The following is a joint response on behalf of:

* The Association of Chief Executives of Voluntary Organisations (ACEVO)
* The Charity Tax Group (CTG)
* The Charities Aid Foundation (CAF)
* The Charity Finance Group (CFG)
* The Charity Retail Association (CRA)
* The Chartered Institute of Fundraising (CIOF)
* The National Council for Voluntary Organisations (NCVO)
* The Scottish Council for Voluntary Organisations (SCVO)

Further information on each body is given in the Appendix to this submission.

1. We welcome the opportunity to respond to the [HMRC Consultation on Charity Tax Compliance](https://www.gov.uk/government/consultations/charities-tax-compliance/consultation-charities-tax-compliance) and look forward to further direct discussion with HMRC on these proposals and the associated impact for not-for-profit organisations in the UK. This will be very important in order to avoid unintended consequences and unnecessary or disproportionate burdens.

**General Comments**

1. We support moves which tackle tax avoidance and abuse. However, we believe it is also important that measures are proportionate and do not have an unnecessarily adverse impact on compliant charities. In the case of each proposed change, it would be helpful to have an understanding of the scale of the abuse that HMRC is seeking to address.
2. Charities are risk averse (as are many donors of larger amounts). They therefore want as much certainty as possible as to the treatment of a transaction or donation. Any measures that create uncertainty are likely to have a chilling effect on support for charities, and in the recruitment of trustees.
3. We comment on each specific proposal below, using the question numbering in the [Consultation Document](https://www.gov.uk/government/consultations/charities-tax-compliance/consultation-charities-tax-compliance):

**Preventing donors from obtaining a financial advantage from their donation**

***Question 1: Do you foresee any unintended consequences on legitimate charities from introducing this rule?***

The Charity Tax Group was deeply involved in the formulation of the original Tainted Charity Donations (TCD) rules and took great care to involve major donors in the process to ensure that there were no unintended consequences or disincentives to donors to give, particularly if that arose out of uncertainty as to whether a donation would be ‘caught’ or not. Both HMRC and sector representatives also gave careful consideration to the impact of the rules on legitimate, compliant charities, so as not to create administrative burdens (for example, the need to retain records over a considerable period of time solely because of the rules under contemplation).

A full replacement of the TCD rules (Option 1) would need to take these factors into account while seeking to counter the perceived mischief. As with the formulation of the TCD rules careful thought and analysis would be needed from a variety of stakeholders. Changes should not be made hastily.

Therefore, Option 1 does not appeal.

First, the time, expense and resource of re-casting the legislation seems likely to result in disproportionate effort to solve the problem.

Second, it is possible for both a charity and the donor to benefit from a mutually beneficial arrangement. Assuming that the associated benefits rule in ss417 to 418 ITA 2007 / ss195 to 196 CTA 2010 is not in point, this should not necessarily be discouraged where tax or other financial advantage is not the main purpose of the transaction(s) concerned. In this context, we think that the current TCD rules are well framed. Taking the case of Reb Moishe Foundation v HMRC [2020] UKFTT 0303(TC), had the charity undertaken negotiations at arms-length including undertaking demonstrably sufficient due diligence and seeking independent professional advice, concluding that there would be a very real prospect of the loan and interest being paid on time, we think that there should not be an automatic tainting of the donation in question, notwithstanding that the donor received financial assistance from the charity. In our view, the presence or absence of mischief can be fact specific and the status quo should be retained in this regard.

Third, there is a risk that many charities, particularly those run by volunteers, will not realise that they may create chargeable income from donations and may then discover years later that they have a tax liability that they are unable to fund. There is a perception that charities do not pay tax. It is therefore preferable that anti-avoidance legislation is appropriately framed to penalise those that seek to benefit from non-compliance and only to penalise a charity if they are complicit in the avoidance. The current TCD rules provide protection to charities (in s809ZN(5) Income Tax Act 2007) where they are not aware and are not a party to the ‘relevant arrangements’. Notwithstanding s809ZN(5), HMRC’s published practice (in section 13 of Annex viii to the Charities Detailed Guidance Notes) is to look to the donor and any other financially advantaged person first and we trust that this would continue under any replacement rules.

Finally, if limits on financial assistance form part of a new set of rules, these could be arbitrary unless they are determined by reference to the size of the donation - which risks complexity and potentially, ‘cliff edge’ results. They would also need to carve out arrangements that are beneficial to the charity but are not abusive despite the financial assistance gained.

***Question 2: Do you foresee any significant challenges for charities to maintain appropriate records of any arrangements, such as substantial loans, they make?***

One of the concerns that we had with the Substantial Donor rules (which the TCD rules replaced) was the need to retain records for a prolonged period of time, ‘in case’ the rules may bite. For example, if a donation is made in Year 1 and a transaction, that could confer a benefit on the donor, is undertaken some years later, the record keeping and need to link the two transactions could present challenges to the charity. Charities may feel obliged to maintain significantly greater records than at present in order to link the earlier donation with any subsequent transaction and not to proceed with the latter if there is any risk of contravening the new rule. This would put an unreasonable burden on compliant charities, particularly where staff / volunteers change over time or different teams deal with donations and investments etc.

UK GDPR requires that personal data are not held for longer than is necessary. Charities will therefore be concerned to comply with GDPR requirements and may inadvertently delete required documentation / data prematurely in the context of these tax requirements. This risk would need to be borne in mind in framing any new rule and the guidance to support it.

The current rules are more likely to flag up at the outset that a particular ‘arrangement’ is vulnerable to falling foul of the TCD rules. This is a strength of the current rules meaning that only records that are necessary to be kept are retained. Any replacement rule that creates uncertainty will lead to charities keeping records for unnecessarily long periods in order to provide an ‘in case’ defence to trustees’ actions.

***Question 3: Do you foresee any unintended consequences on legitimate arrangements from changing the rules in this way?***

***Question 4: Do you believe proposed changes to the current wording would achieve our objectives or do you believe there will still be room for abuse?***

***Option 2:***

Whilst Option 2 (remove Condition B - the requirement to demonstrate that Condition A arrangements relating to the donation were made to provide financial advantage to the donor or a connected party) may have superficial appeal, it introduces donor uncertainty which may have an adverse impact on the willingness of major donors to donate if there is any risk that tax relief may be challenged. It may be hard to clearly define ‘benefit’ and ‘incidental’ is unlikely to be capable of clear definition in this context. Whilst HMRC may provide guidance on these points, such guidance cannot cover every circumstance and in any event, does not carry force of law. Donors, charities and their professional advisers are therefore unlikely to derive comfort from guidance alone when considering a major donation. The motive test in Condition B is therefore an important element that should not be removed.

***Option 3:***

Option 3 (change the current wording of Condition B, in particular the reference to ‘financial advantage’ and replacing it with ‘financial assistance’ or financial benefit’) appears to us to be the best option. It retains the structure of the current TCD rules which has been found to work for charities and donors alike. Maintaining the motive test will maintain donor and charity confidence when a major donation is being contemplated.

If this option were to be pursued, it would be essential to retain the ‘arms-length’ rule in s809ZK ITA 2007 as applying for ‘financial assistance’ or ‘financial benefit’ in the way that it applies to ‘financial advantage’.

As was the case when originally framing the TCD rules, the proposed changes in wording should be tested with real major donors. As before, we could find some donors willing to engage with HMRC on this.

Nevertheless, it would be essential, for HMRC to publish clear guidance on the way that it would normally apply and interpret key phrases used in the amended legislation to provide clarity for non-technical users.

We do not have a view on whether or not the proposed changes in wording will still leave room for abuse.

**Preventing abuse of the charitable investment rules**

***Question 5: Are there any circumstances where a charity may need to make an investment or loan for reasons other than benefitting the charity?***

Since trustees of a charity are required to act in the best interests of their charity, we cannot conceive of circumstances where an investment would need to be made where there is no benefit to the charity. Furthermore, charity auditors and independent examiners have a duty to report material amounts of non-charitable expenditure to the relevant charity regulator (as set out in "[Matters of Material Significance reportable to UK charity regulators](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/879491/20200129_-_Matters_of_Material_Significance_guidance_April_2020__FINAL_.pdf)", CCEW, OSCR & CCNI joint guidance, April 2020). Paragraph 3.6, for example, directly addresses this issue.

Loans fall within Type 12 and therefore are already required to be made for the benefit of the charity.

However, there are circumstances where loans and investments may be made both for the benefit of the charity and another or others. We would not want any change to eliminate that possibility that trustees can make a loan or investment in circumstances that are not abusive.

It is of course recognised that charities are permitted to make investments where the trustees have mixed motives for doing so, so long as in making of the investment, the charity pursues its charitable purposes. This may include social investment, and programme related investment where there may be little or no financial return. If the ‘benefit to the charity’ test is extended to any of Types 1 to 11, HMRC Guidance supporting this should make very clear that ‘benefit’ is wider than ‘financial benefit’ and includes social investment and programme related investment, with links to appropriate guidance from the UK charity regulators.

Our response to Question 1 comments on the case of Reb Moishe Foundation v HMRC [2020] UKFTT 0303(TC) and how, had the facts of the case been significantly different, the transactions may not of themselves have been, in our view, abusive. The charity stood to benefit significantly notwithstanding benefit also being afforded to the borrower. In that case, the Tribunal concluded that the loan was indeed made for the benefit of the charity.

***Question 6: Do you foresee any significant challenges retaining records and documents to justify, if requested by HMRC, the investment decision process and demonstrate how the investment benefits the charity?***

The vast majority of charities seek to be compliant in tax and other regulatory matters and are keen to support measures to uphold the charity brand. However, any additional administrative or other burdens that result from regulation need to be proportionate. At present, we are not aware of the scale of the problems that HMRC seeks to address and it is therefore difficult to assess what a proportionate response should look like.

Whilst the proposed change makes perfect sense, we wonder whether it is necessary to add the requirement for an investment to be for the benefit of the charity and not for the avoidance of tax to all 11 investment Types? For example, does HMRC foresee opportunities for abuse in the case of investments falling within Types 2-4 (common investment funds and common deposit funds)? There may also be other parts of the remaining Types where the risk of abuse is negligible. Whilst it is tempting to apply the new rule to all 12 Types, doing this creates uncertainty for charities which will prompt many to seek professional advice at not insignificant expense in order to re-assure themselves that they are doing the right thing.

Charities are by nature, often very cautious and may worry about proving compliance with the new rule, possibly for many years after making an investment. What manner of records, if any, would be expected in respect of ordinary bank etc. deposits (Types 9 and 10)?

Investments by their nature are often long-term arrangements and it will therefore be necessary for charities to retain sufficient records to be able to justify the reasons behind the original transaction. If the need to justify the charity’s investment is necessary, this requirement should be restricted to the Types where there is a perception of risk, rather than a blanket change to all of Types 1 -11. It may be that this risk is limited to investment in land.

The Consultation Document includes the following comment:

*“Whilst we are not proposing for all charities to make a claim to HMRC for Type 1 to Type 11 investments, it is expected that charities will be required, where HMRC has cause to consider the reasons behind the investment, to justify any investment they make and demonstrate how this benefits the charity.”*

This is likely to create uncertainty and potentially unwelcome bureaucracy if the ‘Type 12’ test is extended to Types 1 to 11. The suggestion is that HMRC will reserve discretion to itself over whether or not to require charities to submit a claim (whether free standing or within a return) for all types of investment and to challenge those that may appear to be unacceptable.

Alternatively, if HMRC dispenses with the legal requirement to make a claim, this will leave all non-filing charities in the position of not knowing whether their investments are approved or not. This may lead to calls for HMRC to offer a clearance mechanism at significant expense to both HMRC and charities. At present this risk is limited in practice to Type 12 investments. We are therefore of the view that any extension of the Type 12 test should be strictly limited to categories where there is actual evidence of abuse and that the limitation should be incorporated into the amending legislation.

Very clear guidance on the sorts of records that will need to be retained and for how long, will be necessary for any category of investment to which the Type 12 test is to apply in future. This would need to be accompanied by an ongoing awareness campaign as the Type 1 to 12 legislation is not generally well known amongst charities.

**Closing a gap in non-charitable expenditure rules**

***Question 7: Do you agree that it is rational and proportionate to review ways to close the tax gap here? If not, please provide reasons why?***

Very few charities, or their advisers have met situations in practice whereby a restriction of tax relief needs to be made on account of non-charitable expenditure. It is therefore difficult for us to gain either quantitative or qualitative evidence from our members on this point. HMRC is best placed to understand the scale of the problem that it seeks to resolve. We do however comment on whether or not we view the proposals to be rational and proportionate.

***Extending the definition of attributable income and gains***

The Consultation Document states that “Extending this definition to other income streams would increase the opportunity for HMRC to collect the ***right amount*** of tax within a specified period.” (***our emphasis added***). However, we question what the ‘right amount’ of tax is, in these circumstances? In our view, this term is subjective. Any change would require clear justification.

Using the example in the Consultation Document, it can at least be logically stated that if, in an accounting period, a charity has tax relieved income of £25,000 and legacy income of £10,000 and, in that period, it incurs non-charitable expenditure of £40,000, then a proportion of the £40,000 non-charitable expenditure has been funded from non-tax relieved income (in the hands of the charity). Further, it is not necessarily the case that legacy income has been afforded tax relief in the deceased’s estate. For example, the legacy may be from an estate in which no inheritance tax was payable, or from an overseas estate. In the case of income derived from cash donations other than under Gift Aid, payroll giving or GASDS, no party has received tax relief.

We appreciate that there are alternative ways of looking at this question, particularly where there is tax relieved income earned in previous accounting periods that remains unspent and forms part of the charity’s reserves (but see our further comment on charity reserves policies, below).

On balance, therefore, we feel that the present rules provide a more rational approach to the non-charitable expenditure rules than the proposed rule.

Non-charitable expenditure is not always the result of deliberate non-compliance by the charity’s trustees. For example, they may have supported overseas persons or bodies within their charitable purposes, but inadvertently not complied with the overseas expenditure rules.

Although the legislation does not provide for this, one should perhaps also distinguish between restricted fund income (which by virtue of the trusts under which the fund is held, should not be spent for any other purpose) and general fund income and expenditure.

We appreciate that HMRC is keen not to allow public funds to fund non-charitable expenditure. We would therefore be happy to discuss this proposal further with officials.

***Carry back of excess non-charitable expenditure to prior periods***

Whilst we can see the reason for this proposal, we do wonder how much of a problem it is in practice? Charities are of course obliged to spend their incoming resources within ‘a reasonable period’ of receipt. Hence the need for charities to have reserves policies to justify the holding of reserves. It seems likely that few charities would spend six years building up relatively small levels of reserves and then incur a significant amount of non-charitable expenditure in year 6.

We would welcome the opportunity to discuss this further with officials to better understand the nature of the problem, in order to assess whether or not there are potential issues for charities. For example, the need to maintain additional accounting records for long periods of time may not be practical for many charities.

**Sanctioning charities that do not meet their filing and payment obligations**

***Question 8: What are the barriers to some charities not filing tax returns when requested to?***

In our experience, the barriers to filing fall into two categories:

* Smaller charities
* Other charities attempting to ascertain what is being asked (and why) and where to obtain the information required.

Charities that file returns on an annual basis will have worked out where and how to obtain the required information and therefore shouldn’t experience barriers that would delay filing.

***Smaller charities***

Issues faced by smaller charities receiving notices to file a return on an occasional basis fall into the following categories:

* **Newly formed charities, especially CIOs and charitable companies who routinely receive a notice to file following incorporation.**

Depending on their first accounting period, which may be more than 12 months, it can take time before the first accounts have been prepared. The notice to file may have been received some time previously and can easily be overlooked.

* **Volunteer staffing of smaller charities**

The reason behind the need for some of this information is not clear. Smaller charities often run by volunteers with little or no tax knowledge struggle to know what to put where on the return creating stress and fear of ‘getting it wrong’. They will often not know where to turn for help and the cost of professional help may well be beyond their resources (professional fees can run from £1,500 to several thousand pounds for preparation and submission of a ‘simple’ return).

* **Perception that charities do not pay tax**

Feedback that we have received in response to this consultation suggests that small, volunteer led charities can be confused when they receive a notice to file a return as they think that charities do not pay tax and therefore don’t have to file tax returns. In some cases, a notice causes panic. In others, the recipient thinks that it can be safely ignored. This is clearly an educational matter that should perhaps be addressed on the notice to file itself. But it may go some way to explain some charities’ non-compliance.

* **Lack of digital skills**

Staff of or volunteers in smaller charities often lack digital skills. They are not used to using the gov.uk online service, completing forms online or using specialist software, adding to their stress and anxiety in trying to comply with a notice to complete a return that is only sent periodically. Finding “the HMRC online system too difficult to use” is specifically excluded as a ‘reasonable excuse’ to file a CT600 / CT600E on a paper form.

[The Charity Digital Skills Report 2022](https://charitydigitalskills.co.uk/wp-content/uploads/2022/07/Charity-Digital-Skills-Report-2022.pdf) found that digital skills, prioritisation and resource vary widely across the sector.

* **Filing paper returns**

For those that are permitted to file a return in paper form (for example the SA900/SA907), the deadline for paper filing is earlier than for electronic filing, disadvantaging charities that, for example, cannot afford commercial software.

* **Sourcing appropriate return software**

Having established that tax return software is needed, additional stress and anxiety can be experienced in finding a suitable software provider from the gov.uk charity software list.

* **CT600E Guidance**

The Guide on completing the CT600E is unhelpful in that many sections refer the reader to the underlying legislation rather than giving helpful lay guidance.

* **Notices to file a return**

There are not infrequent cases where the notice to file has been sent to the address of a former trustee or treasurer, or to a building that is no longer occupied by the charity such that the notice does not reach the right person at all, or arrives too late to action in good time.

***Other charities***

**Information requested in the CT600E:** Professional accountants report that there is no consensus between them as to what should be included in some of the boxes on the charity returns. If professionals struggle, charity staff and volunteers will struggle all the more. We therefore question the value of the data received by HMRC if it is both periodic, rather than annual, and is inconsistent as between different charities returns, and possibly within a charity as between returns on different occasions.

The lack of explanation as to why some of the information is requested is a disincentive to comply.

***Question 9: Do you think that this would adversely affect the operations of charities or CASCs and what might be the consequences of this?***

While deliberate failure should be subject to appropriate sanction, our expectation is that many charities that fail to file on time do not do so deliberately or carelessly. We are therefore concerned about the consequences of a charity having Gift Aid (or other reliefs) withheld pending submission of a return, particularly given the current financial pressures.

We would therefore favour a system whereby the charity has an opportunity to offer a reasonable excuse, or similar, prior to funds being withheld by HMRC. The definition of ‘reasonable excuse’ in this context should be wide enough to cater for the barriers identified in our response to Question 8. The time allowed for a reasonable excuse to be submitted should be generous, and sufficient to compensate for, or overcome, these barriers.

***Question 10: How should changes be targeted to ensure they encourage charities to meet their obligations to file a tax return when required to do so – for example should small charities be treated differently to larger ones?***

We would favour smaller charities and those with a smaller value of Gift Aid claims being treated differently from larger ones that have more resource and less risk of HMRC notices not reaching the right destination in good time. This is especially important as, proportionately, the existing late filing penalty regime has a much more significant impact on smaller charities.

For example, HMRC could have power to grant periods of grace, to not automatically withhold vital resources, and only to do so in the most extreme cases.

A short form CT600/CT600E form for smaller charities that fall within defined criteria that does not ask for any unnecessary information or contain multiple boxes for which no entry is required of a charity would be a significant step in the right direction. This should be accompanied by well framed guidance that gives certainty and objectivity to the information that is required.

We understand that several years ago HMRC produced a step-by-step guide to completing a CT600 return but we don’t believe that it was ever published. Consideration should be given to a charity specific step by step guide to completing both the CT600 and CT600E and any short form equivalent that may be introduced.

***Question 11: How would it be best to educate the sector about any new rules ahead of their introduction?***

This response is supported by a number of large infrastructure bodies. These organisations offer a wide range of practical support to their members and have significant reach across the voluntary sector. For example, NCVO has over 17,000 members, 80% of which have annual incomes under £100,000. Any combination of them (including CTG) could be commissioned to develop web-based guidance and deliver webinars to reach as many voluntary organisations as possible ahead of the new rules coming into force.

**Other related issues and questions**

***Question 12: Are there any changes which could be made to the charity and CASCs regimes which would ease the burden on the sector?***

In response to The Charity Tax Group’s Future of Gift Aid Project the Government announced at the Spring 2023 TAM day that “The government will continue to engage with the charities sector to improve the way that Gift Aid works in order to minimise administrative burdens through the use of digital technology.” The sector bodies represented in this response look forward to engaging more specifically with HMRC both on Gift Aid and other areas of charity tax compliance that can be simplified and burdens on the sector eased, whilst protecting the Exchequer.

***Question 13: Will any administrative or other burdens be created if any of the above measures are introduced? Is so, what are they?***

Administrative and other burdens are likely to be increased significantly. On this, please refer to our specific replies to questions earlier in this response document.

***Question 14: What are the estimated costs of any additional burdens?***

It is not easy to quantify the financial cost of additional burdens. Aside from charities’ internal costs of complying with the addition burdens, there is the resultant risk of accidental non-compliance and time and resource in charities trying to comply with what is some very unfamiliar ground

Additional costs will fall on both charities and HMRC. The former in attempting to comply with the additional burdens and on HMRC in policing compliance and in identifying and correcting non-compliance.

However, we would add that the costs of compliance are not just financial. The vast majority of charities wish to comply fully with law and regulation. Where compliance is difficult to fathom, considerable stress and anxiety is created that can have a detrimental effect on the health of volunteer and charity staff, and time can be diverted from staff / volunteers running their charities.

We are also concerned that these increased burdens act as a further disincentive to recruiting already hard to find trustees.

***Question 15: Are there any other points you would like to raise or suggestions you would like to make to improve compliance in the Charity or CASC sector?***

It can be difficult for HMRC and charity professional advisors to fully understand the difficulties that staff and volunteers in charities experience in trying to comply with the various requirements put upon them. This is especially so for those involved in smaller charities. We encourage HMRC, with the help of sector infrastructure bodies, to seek feedback from staff and volunteers when preparing forms and guidance.

Charity sector groups have asked HMRC for an exemption for charities from the need to comply with the forthcoming Making Tax Digital for Corporation Tax regime. This is a clear example of burdens being placed on charities, especially smaller ones, where the benefit (as against cost) arising to HMRC and charities is questionable.

The more general role of the Charity Commission, OSCR and CCNI possibly means that they have greater reach to charity personnel, including via social media, than HMRC. As such, they have an important educational role.

We look forward to continuing discussions with officials on the matters covered by this consultation.

|  |  |
| --- | --- |
| **Richard Bray**  Chair, The Charity Tax Group | **Neil Heslop**  Chief Executive, Charities Aid Foundation |
| **Caron Bradshaw**  Chief Executive, Charity Finance Group | **Robin Osterley**  Chief Executive, Charity Retail Association |
| **Katie Docherty**  Chief Executive, Institute of Fundraising | **Sarah Vibert**  Chief Executive, National Council for Voluntary Organisations |
| **David McNeill**  Strategic Director of Development, Scottish Council for Voluntary Organisations | **Jane Ide**  Chief Executive, Association of Chief Executives of Voluntary Organisations |

**17 July 2023**

**Appendix**

This submission is made by the following eight charity sector bodies:

**The Association of Chief Executives of Voluntary Organisations (ACEVO)**

ACEVO’s vision is for civil leaders to make the biggest possible difference. Together with our network of over 1,700 members, we inspire and support civil society leaders through connection, skills and influence.

**The Charities Aid Foundation (CAF)**

CAF is the UK’s largest charity by income. For nearly 100 years have worked with partners across industry, government, and individual philanthropists to ensure vital funding reaches charities around the world. We work to stimulate giving, social investment, and to ensure the effective use of charitable funds by offering a range of specialist financial and philanthropic services to charities and donors. Last financial year, we distributed £876m to good causes in the UK and 135 countries around the world. As the UK’s largest specialist bank for charities, CAF Bank is an integral part of our work and has provided uninterrupted services to over 14,000 charity and social enterprise customers during the pandemic.

**The Charity Finance Group (CFG)**

CFG is the charity that works to improve the financial leadership of charities, promote best practice, inspire change and help organisations to make the most of their funds so they can deliver the biggest possible impact for the communities and beneficiaries they serve. CFG has over 1,450 members and collectively they manage over £21 billion in charitable funds – around a third of the entire charity sector’s income.

**The Charity Retail Association (CRA)**

The CRA represents the interests of charity retailers with around 450 retailer members, who together run 85 per cent of all charity shops in the UK. Our members range from national chains running several hundred shops to local charities running a single shop. It supports its members through advocacy, benchmarking research, providing policy and operational advice and offering networking and learning opportunities.

**The Charity Tax Group (CTG)**

CTG has over 1,000 members of all sizes representing all types of charitable activity in the United Kingdom, as well their professional advisers. The organisation was set up in 1982 to make representations to charity taxation and it has since become the leading voice for the UK charity sector on this issue.

**The Chartered Institute of Fundraising (CIOF)**

CIOF is the professional membership body for UK fundraising. We champion our members’ excellence in fundraising. We support fundraisers through professional development and education. We connect fundraisers across all sectors and skill sets to share and learn with each other.

**The National Council for Voluntary Organisations (NCVO)**

NCVO is the membership body for the voluntary sector and volunteering in England. With over 17,500 members, NCVO represents all types of organisations, from large ‘household name’ charities to small voluntary and community groups.

**The Scottish Council for Voluntary Organisations (SCVO)**

SCVO is the national membership organisation for the voluntary sector in Scotland. Its role is to champion voluntary organisations in building a flourishing society and support them to do work that has a positive impact. Along with its community of 3,500+ members and supporters, it wants to see thriving charities, social enterprises, and community groups at the heart of a successful, fair and inclusive Scotland.