



**PALESTINE
SOLIDARITY
CAMPAIGN**

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20/09/2019

Dear Charity Commission (The Commission),

RE: JT/C-499186/RC

Thank you for your response to the over 4,000 letters PSC supporters sent to you, which outline the belief that JNF UK should have their suitability to hold charitable status investigated by The Commission. These letters show a huge amount of public interest in the matter.

We are responding to your request for new evidence concerning regulatory issues surrounding JNF UK, and its associated charities. We raise a number of issues below that fall within The Commission's regulatory remit, on the basis of which an investigation should be undertaken.

The OR Movement

As stated in its 2016 Annual Accounts (section 13: restricted funds) JNF UK has provided funds for the OR Movement, an Israeli organisation which supports Jewish settlement of the Negev and Galilee. The OR movement supported the construction of the Jewish town of Hiran, which aims to replace the Palestinian Bedouin village of Umm-al-Hiran, which has been subject to forcible evacuation. JNF-KKL's own website states that "[F]riends of JNF UK have supported.... The Hiran Forest", part of the attempt to replace the Palestinian village. Such demolitions are against international law. The United Nations have stated on numerous occasions that Bedouin Palestinians must be allowed to remain on their land.

JNF UK has also supported the illegal Jewish-only settlement of Sansana, a religious community linked to the OR movement. Sansana is situated in the occupied West Bank, to the south-west of Hebron. Every Israeli settlement on occupied Palestinian territory is illegal and considered a war crime under the Fourth Geneva Convention.

These actions by JNF UK fit into the Regulatory and Risk Framework of The Commission and its concomitant five strategic objectives that make up its Statement of Strategic Intent. As this document states The Commission has a strategic objective to deal with, and ultimately reduce, harm. We believe that the actions of JNF UK, through supporting the OR Movement, are contributing to harming Palestinians through the illegal demolition of their homes and structures.

Support for the Israeli military

We are also concerned by the dishonesty found in the JNF UKs statement of Charitable Objects which fails to mention it supports the armed forces of the state of Israel.



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We believe that undertaking projects with entrants to the army, with armed and serving soldiers actively engaged in control and combat, and with soldiers on exit from the army is questionable as a charitable action. Through the tax benefits it receives as a charity, UK funds are contributing to Israel's war effort against an occupied people by offering support to the personnel involved.

Further, the JNF UK lists a remittance to Israel titled 'Tzuk Eitan Gaza war effort' in its 2014 and 2015 annual accounts. Tzuk Eitan is Israel's name for its 51-day aerial bombardment and ground invasion of Gaza in 2014, which killed over 2,100 Palestinians. The United Nations Independent Commission of Inquiry on the 2014 Gaza conflict found credible allegations that Israel had committed war crimes through its indiscriminate targeting of civilians.

In its Statement of Strategic Intent, the Commission states that it aims to ensure the public can make informed decisions when donating to a charity. It is therefore vital the Charity Commission find where this money went, to ensure public choice is informed.

Equality

The Commission also has a regulatory role in ensuring that charity trustees comply with their legal duties and responsibilities in managing their charity. This includes with the Equalities Act 2010. The act makes it against the law to discriminate against anyone because of certain 'protected characteristics.' This includes the characteristic of race, which includes "colour, nationality, ethnic or national origin."

Palestinians, in Israel, the Occupied Palestinian Territories, and in exile face systemic discrimination by the State of Israel because of their national origin. JNF UK contributes to this. As outlined above they fund an organisation which promotes illegal settlement building in the West Bank, and the replacement of Palestinian villages by Jewish-only towns in the Negev.

Breach of Legal Rights of Al Ajarma Family

As your guidance in the Regulatory and Risk Framework makes clear, the Commission is required to investigate "a single or recurring breach(es) of either a legislative requirement or of the charity's trusts leading to material charitable funds being misapplied. "

Your own Barrister, Iain Steele, stated that the JNF UK "may have infringed the legal rights" of the Al Ajarma family, a Palestinian family dispossessed from their land in 1948. One member of the family, Kholoud Al Ajarma, brought a legal challenge to the charitable status of the JNF UK, which funded the creation of British Park, a JNF UK funded leisure facility built on the land of her dispossessed village. The Commission's barrister made the comments within his skeleton argument and repeated them in person the First Tier Tribunal Case heard in Manchester on April 2nd, 2019. Despite this legal opinion, the Commission has failed to investigate the matter.



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Once again, we invite you to meet with representatives of the campaign to discuss and submit evidence on the information above.

We look forward to your response, and prompt investigation of the above,

Yours Sincerely

Ben Jamal
Director