

Overview

Joint campaigning for non-party campaigners

This document is for non-party campaigners who want to understand the rules about working together with other non-party campaigners as part of a common plan or joint campaign

Forms you might need:

TP7

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Translations and other formats

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Email: publications@electoralcommission.org.uk

Terms and expressions we use

We use '**must**' when we refer to a specific legal or regulatory requirement. We use '**should**' for items we consider to be minimum good practice, but which are not legal requirements. You do not have to follow this guidance, but if you do, you will normally be doing enough to comply with the law.

Our approach to enforcement

The Commission regulates political funding and spending. We are committed to providing those we regulate with a clear understanding of their regulatory obligations through our guidance documents and advice service. If you are unsure of how any of the rules apply to you, please call us for advice. We are happy to help, so please get in touch.

We use advice and guidance proactively in order to secure compliance. And we take enforcement action, using our investigatory powers and sanctions, where it is necessary and proportionate to do so in order to meet our enforcement aims and objectives. If you do not comply with legal requirements you or your organisation may be subject to civil or criminal sanctions. You can find more information about the Commission's approach to enforcement at www.electoralcommission.org.uk/party-finance/enforcement

Joint campaigning for non-party campaigners

Who this document is for:

Non-party campaigners who want to work together on regulated campaign activity with other non-party campaigners as part of a joint campaign.

The document covers:

- What a joint campaign is
- How joint campaigns can be structured
- Donating to another campaigner
- Lead campaigners and minor campaigners
- How spending must be accounted for

Related documents:

- [Overview of non-party campaigns](#)
- [Overview of non-party regulated campaign activity](#)
- [Overview of donations to non-party campaigners](#)
- [Managing non-party campaign spending](#)
- [Registering as a non-party campaigner](#)
- [UK Parliamentary general election: focused constituency campaigning](#)

Forms

- [Form TP7: Notification of Lead Campaigner](#)
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Summary

Political parties, candidates and non-party campaigners are vital to a healthy democracy and we encourage active participation by campaigners. Where there is significant spending on campaigning, there are rules that must be followed to ensure that there is transparency in the system.

Non-party campaigners undertake a variety of campaigning activities and sometimes choose to work with other non-party campaigners. There are special rules you must follow when two or more non-party campaigners want to work together as part of a joint campaign.

Introduction

Non-party campaigners are individuals or organisations that campaign in the run-up to elections, but are not standing as political parties or candidates.

In electoral law, these individuals or organisations are called 'third parties'. Where non-party campaigners have registered with the Electoral Commission they are called 'recognised third parties'. In our guidance, we call recognised third parties 'registered non-party campaigners'.

Under the Political Parties, Elections and Referendums Act 2000 (PPERA), there are limits on spending money on certain campaign activities.

There are special rules when you want to work with another non-party campaigner as part of a joint campaign. When you spend money as part of a joint campaign, that spending may count towards the limits for each campaigner involved. This is to stop people getting around the spending limits by coordinating several campaigns at the same time. This document explains what rules apply and how joint campaigns may be structured.

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Regulated campaign activity

The non-party campaigning rules apply to spending on what we call 'regulated campaign activity'.

The following will be 'regulated campaign activity' if they can reasonably be regarded as intended to influence voters to vote for or against political parties or categories of candidates, including political parties or categories of candidates who support or do not support particular policies or issues (we call this the '**purpose test**')

- press conferences or other media events that you organise
- transport in connection with publicising your campaign

As well as meeting the purpose test, spending on the following activities is only regulated if the activities are **also** aimed at, seen or heard by, or involve the public (we call this the '**public test**'): This applies to:

- the production or publication of election material (such as leaflets, adverts and websites)
- canvassing and market research (including the use of phone banks)
- public rallies and public events

In the run-up to certain elections, there is a set time when the rules on spending and donations apply. We call this time the 'regulated period'. The regulated period will differ, depending on which election is being held.

Campaigns are regulated in the run-up to elections to:

- the European Parliament
- the UK Parliament
- the Scottish Parliament
- the National Assembly for Wales
- the Northern Ireland Assembly

If you spend or plan to spend more than £20,000 in England or £10,000 in any of Scotland, Wales or Northern Ireland on regulated campaign activity during a regulated period you must register with us as a 'registered non-party campaigner'.

For more information on campaign activity, see:

- [Overview of non-party campaign activity](#)

You can find out more about the regulated period and regulated campaign activity in:

- [Overview of non-party campaigns](#)

Important

During the regulated period for a UK general election, you can only spend up to £9,750 on regulated campaign activity affecting a particular constituency. For more information on constituency limits see:

- [Managing non-party campaign spending](#)

You can register with us at any time before or during a regulated period, but you must register with us before you spend more than these amounts on regulated campaign activity during a regulated period.

For more information about registering with us, see [Registering as a non-party campaigner](#).

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Working with other non-party campaigners: joint campaigns

You may choose to work with one or more campaigners on a joint campaign, perhaps in order to make the overall campaign more effective.

There are spending rules that apply if you or a campaigner that you are working with spends money on regulated campaign activity as part of a coordinated plan or arrangement. We call these the 'joint campaign' rules.

The joint campaign rules apply where:

- spending on regulated campaign activity is incurred by, or on behalf of, a non-party campaigner, and
- the spending is incurred as part of a common plan or other arrangement with another non-party campaigner or campaigners (known as 'working together'), and
- that spending can reasonably be regarded as intended to achieve a common purpose

What we mean by working together

To be part of a joint campaign, you must be working together with one or more other non-party campaigners.

Working together means spending money on regulated campaign activities as a result of a common plan or arrangement between one or more non-party campaigners during a regulated period.

The guiding principle

We recognise that campaigners may come together to campaign in a variety of ways, both formal and informal, and that the ways campaigners interact with other campaigners may change during the course of a campaign. You will need to decide whether you and another campaigner are in fact working together and are part of a joint campaign.

To help you decide whether you and another non-party campaigner are working together on a joint campaign, you should make an honest and reasonable assessment, based on

the facts, whether you and another non-party campaigner are spending money as part of a common plan or arrangement.

This will be straightforward for some spending. However, in some situations it may be more difficult to decide when you are spending money as part of a common plan or arrangement.

In our view, you are not working together if:

- you have informal discussions with other campaigners that do not involve decision-making or coordinating your plans
- you speak at an event organised by another campaigner, but do not participate in any other way
- you do not consult with other campaigners about what you should say in your campaign or how you should organise it.

In our view, you are very likely to be working together if:

- you have joint advertising campaigns, leaflets or events
- you coordinate your regulated campaign activity with another campaigner – for example, if you agree that you should each cover particular areas, arguments or voters
- another campaigner can approve or has significant influence over your leaflets, websites, or other campaign activity.

Your organisation may be comprised of member organisations who share similar goals and objectives but who are separate organisations and who make their own decisions as to how to campaign. You may also provide advice and assistance to the member organisations and it will not be unusual for both you and the member organisations to campaign on the same issue. In such cases, you should make an honest and reasonable assessment, based on the facts, whether you and your member organisations are working together. If you are still unsure, you can email or call us for advice.

Donating to another campaigner

Donating to another campaigner is not covered by the joint campaigning rules.

However, regardless of whether or not you make a donation to another non-party campaigner, the rules still apply if there is a joint campaign as described above.

If you are a campaigner who is receiving donations, there are rules on accepting and reporting donations. Further information on these rules can be found in [Overview of donations to non-party campaigners](#).

Establishing a new organisation to run a campaign

If you work with a number of other non-party campaigners, you may decide to establish a new body or organisation to conduct a campaign. The new body could be, for example, a company, a charity or an unincorporated association.

Provided that the new body is separate and distinct from the organisations that created it, then the body is treated as a different organisation from the campaigners that created the new body. This will be the case even if members of organisations that created the new body are part of its managing structure.

This means that campaign activity undertaken by the new body will not be part of a joint plan unless the new organisation works together with other non-party campaigners. Making a donation to the new body is not joint campaigning.

If the new organisation spends or plans to spend more than £20,000 in England or £10,000 in any of Scotland, Wales or Northern Ireland on regulated campaign activity during the regulated period, it must register with us and follow the rules on donations, spending and reporting.

A donation is money, goods, property or services which is given:

- towards a non-party campaigner's campaign spending, and
 - without charge or on non-commercial terms, and
 - has a value of over £500
- Under PPERA, anything with a value of £500 or less is not a donation.

Only certain types of organisation can register with us as a registered non-party campaigner. For more information see:

- [Registering as a non-party campaigner](#)

Joint campaigns and the constituency spending limit

During the regulated period for the UK Parliamentary general election, the maximum amount a registered or unregistered non-party campaigner can spend on regulated campaign activity in a particular parliamentary constituency is £9,750. For more information please see the [Overview of focused constituency campaigning](#).

We call regulated campaign activity that influences the voting choice of the people in a particular constituency or constituencies 'focused constituency campaigning'. You can undertake focused constituency campaigning in more than one constituency but it does not include a national campaign across the whole of a part of the UK (England, Scotland, Wales or Northern Ireland).

If you are working together in a joint campaign with other joint campaigners, the combined spending and your own spending on focused constituency campaigning must not breach the £9,750 constituency limit.

Registered non-party campaigners

As a registered non-party campaigner, you must also attribute your spending on a UK-wide campaign equally to each of the UK's 650 parliamentary constituencies. If you are campaigning in only one part of the UK, you must attribute spending equally to each constituency in that part. The spending attributed to each constituency counts towards the £9,750 limit for each constituency.

If you spend the whole £9,750 on focused constituency campaigning in a particular constituency, you will breach the constituency spending limit in that constituency if you then spend anything on any other regulated campaign activity that must be attributed to that constituency. For more information, please see [Managing non-party campaign spending](#).



There are 533 constituencies in England, 59 in Scotland, 40 in Wales and 18 in Northern Ireland.

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How joint campaigns can be structured

There are different ways you can structure your joint campaign:

- you can be working with other campaigners as an 'ordinary joint campaigner'
- you can be involved in a joint campaign as either a 'lead campaigner' or a 'minor campaigner'. We call a campaign that has a lead campaigner a 'lead campaign'
- you can be involved in a complex joint campaign made up of ordinary joint campaigners, lead campaigners, and minor campaigners

Working with other campaigners as an ordinary joint campaigner

If non-party campaigners work together as part of a joint campaign without a lead campaigner, those non-party campaigners must record the combined regulated campaign spending as it will count towards the spending limits for **each** non-party campaigner involved. We call non-party campaigners involved in such a joint campaign 'ordinary joint campaigners'.

If you want to spend more than £20,000 in England or £10,000 in any of Scotland, Wales or Northern Ireland on regulated campaign activity, you must register with the Electoral Commission.

If you do not register, or are not eligible to register, you cannot spend more than more than **£20,000** in England or **£10,000** in any of Scotland, Wales or Northern Ireland during a regulated period on regulated campaign activity.

Example

You and another non-party campaigner each agree to spend £15,000 on a joint campaign in England. So, the total spending for the joint campaign is £30,000.

Both of you must record a joint campaign spend of £30,000.

As the cost of the joint campaign spending is more than £20,000 in England, you and the other campaigner must each register with us as a registered non-party campaigner.

For information on registering with us as a registered non-party campaigner see:

- [Registering as a non-party campaigner](#)

Ordinary joint campaigners and the constituency spending limit

If you are working together in a joint campaign with other ordinary joint campaigners, the combined spending on focused constituency campaigning must not breach the £9,750 constituency limit.



Registered non-party campaigners

If:

- you are a registered non-party campaigner, and
- you are working with other campaigners as an ordinary joint campaigner, and
- you or any other ordinary joint campaigner, either separately or together as part of your joint campaign, spend the whole £9,750 on focused constituency campaigning in a particular constituency

you will breach the constituency spending limit in that constituency if you, or any other ordinary joint campaigner, then spends anything on any other regulated campaign activity that must be attributed to that constituency.

All the other registered non-party campaigners involved in your joint campaign will also breach the constituency limit.

You will breach the constituency limit whether or not your spending on other regulated campaign activity is part of the joint campaign.

For more information please see [Managing non-party campaign spending](#).



Lead campaigns

What is a lead campaigner?

Where there is a joint campaign, a registered non-party campaigner who is part of that campaign can agree to report the joint campaign spending on behalf of themselves and other non-party campaigners involved in the joint campaign.

A registered non-party campaigner who agrees to report the joint campaign spending of other campaigners is known as a lead campaigner. A campaigner whose joint campaign spending is reported to us by a lead campaigner is known as a minor campaigner.

How to become a lead campaigner

If you are a registered non-party campaigner you can notify us that you are a lead campaigner.

To become a lead campaigner you must:

- notify us that you are part of a joint campaign and that you will be a lead campaigner in the joint campaign and
- tell us the minor campaigners who have agreed that you will report joint campaign spending on their behalf

You can notify us at any time before the end of the regulated period. You can also notify us of additional minor campaigners at any time before the end of the regulated period.

There is no limit on the number of lead campaigners in a joint campaign. There is also no limit on the number of minor campaigners who can work with any one lead campaigner in a joint campaign. However, a minor campaigner cannot also be a lead campaigner in the same campaign.

You should use [Form TP7: Notification of Lead Campaigner](#), to apply to become a lead campaigner and to inform us of any additional minor campaigners.

Important

As a lead campaigner, you are agreeing to report the spending of minor campaigners involved in the joint campaign. All joint campaign spending by minor campaigners counts towards your spending limit.

Lead campaigners working with minor campaigners

We call those minor campaigners who have agreed to you reporting on their behalf 'your minor campaigners'. If you are a lead campaigner, your spending and any spending incurred by your minor campaigners as part of the joint campaign will count towards **your** spending limit during the regulated period.

As a lead campaigner, you must report the campaign spending of your minor campaigners involved in your joint campaign in your spending return after the election. Your spending return must also include receipts or invoices for any spending over £200 incurred by you or any minor campaigner.

This means you should ask all your minor campaigners:

- to let you know how much they have spent on the joint campaign in each part of the UK
- to provide you with receipts and invoices for any spending over £200 on the joint campaign.

Example

You and three other campaigners, A, B and C, decide to work together as part of a joint campaign in Wales. You have all decided that campaigners A, B and C will each spend £9,000 and you will spend £15,000 on the joint campaign. A, B and C do not spend any other money on regulated campaign activities.

In order to lessen the regulatory burden on campaigners A, B and C, you decide to become the lead campaigner. You register with us as a registered non-party campaigner. Before any spending is incurred, you notify us that you are the lead campaigner and that campaigners A, B and C are the minor campaigners in the joint campaign.

As campaigners A, B and C have been notified as minor campaigners, they do not need to register with us or report their spending on the joint campaign. As the lead campaigner, you must report spending of £42,000 - your spending and the spending of campaigners A, B and C on the joint campaign.

For further information on spending limits and managing your campaign spending see:

- [Managing non-party campaign spending](#)

If a minor campaigner spends more than £20,000 in England or £10,000 in Scotland, Wales or Northern Ireland on regulated campaign activities during the regulated period, they will still need to register with us.

Lead campaigners and the constituency spending limit

If you are a lead campaigner, the combined spending of you and your minor campaigners on focused constituency campaigning must not breach the £9,750 constituency limit.



Registered non-party campaigners

If:

- you are a registered non-party campaigner, and
- you are a lead campaigner, and
- you or any of your minor campaigners, either separately or together as part of your joint campaign, spend the whole £9,750 on focused constituency campaigning in a particular constituency



you will breach the constituency spending limit in that constituency if you, or any for your minor campaigners, then spends anything on any other regulated campaign activity that must be attributed to that constituency. This includes your spending on any regulated campaign activity unconnected with the joint campaign. For more information please see [Managing non-party campaign spending](#).

Minor campaigners working with a lead campaigner

When do you become a minor campaigner?

If you are a non-party campaigner involved in a joint campaign, you become a minor campaigner when another registered non-party campaigner notifies us that they are a lead campaigner and you are their minor campaigner before the end of the regulated period.

There is no limit on the number of minor campaigners who can work with any one lead campaigner in a joint campaign. There is also no limit on the number of lead campaigners in a joint campaign. However, a lead campaigner cannot also be a minor campaigner in the same campaign.

If you spend more than £20,000 in England or £10,000 in any of Scotland, Wales or Northern Ireland on regulated campaigning you must register and report your own spending to us, even if you are a minor campaigner.

If you become a minor campaigner in relation to a joint campaign, you will remain a minor campaigner for as long as you are involved in that joint campaign or until the end of the regulated period.



Minor campaigners who spend no more than £20,000 in England and £10,000 in any of Scotland, Wales and Northern Ireland

If you are a minor campaigner in a joint campaign, you do not have to register with us or report any of your spending if your total spending on regulated campaign activities during the regulated period (including your spending as part of the joint campaign and any other spending unconnected with the joint campaign) is no more than £20,000 in England and £10,000 in each of Scotland, Wales and Northern Ireland.

If your spending is no more than £20,000 in England and £10,000 in each of Scotland, Wales and Northern Ireland, your lead campaigner is responsible for reporting your spending as part of the lead campaign to us.

This means you should:

- agree with all other non-party campaigners involved in the joint campaign how much you can spend, and
- tell your lead campaigner how much you have spent on regulated campaign activity in each part of the UK as part of the lead campaign, and

- in the run-up to a UK Parliamentary general election, tell your lead campaigner how much you have spent on focused constituency campaigning as part of the lead campaign, and
- provide receipts and invoices on regulated campaign spending over £200 to your lead campaigner

Minor campaigners who spend more than £20,000 in England or £10,000 in any of Scotland, Wales or Northern Ireland

If you are a minor campaigner who spends more than £20,000 in England or £10,000 in any of Scotland, Wales or Northern Ireland on regulated campaign activity during the regulated period (including spending on the joint campaign and any other regulated campaign spending):

- you must register with us before incurring spending above the relevant threshold
- the combined joint campaign spending on national campaigning will count towards your spending limit for the relevant part of the UK
- during the regulated period for a UK Parliamentary general election, the combined joint campaign spending on focused constituency campaigning will count towards your constituency spending limit of £9,750
- you will be responsible for reporting your spending and donations to us in respect of the joint campaign and any other campaign spending. Your lead campaigner must also report your spending in respect of the joint campaign

Important

During the regulated period for a UK general election, you can only spend up to £9,750 on regulated campaign activity affecting a particular constituency. For more information on constituency limits see:

- [Managing non-party campaign spending](#)

Minor campaigners and the constituency spending limit

If you, any other minor campaigner, or your lead campaigner, spends the whole £9,750 on focused constituency campaigning in a particular constituency, your lead campaigner and all other registered non-party campaigners involved in your joint campaign will breach the constituency spending limit in that constituency if anyone as part of your joint campaign then

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spends anything on any other regulated campaigning that must be attributed to that constituency.

Registered non-party campaigners

If:

- you are an unregistered minor campaigner, and
- you later decide to register with us, and
- you, or any other campaigner involved in the joint campaign, either separately or together as part of your joint campaign, spend the whole £9,750 on focused constituency campaigning in a particular constituency

you will breach the constituency spending limit in that constituency if you, or any other campaigner involved in your joint campaign, then spends anything on any other regulated campaign activity that must be attributed to that constituency.

This includes your spending on any regulated campaign activity unconnected with the joint campaign. For more information please see [Managing non-party campaign spending](#).



Joint campaigns with ordinary joint campaigners, lead campaigners, and minor campaigners

Several ordinary joint campaigners, lead campaigners, and minor campaigners may choose to work together as part of a joint campaign. We call such campaigns ‘complex joint campaigns’. A non-party campaigner cannot be both a lead campaigner and a minor campaigner in relation to the same joint campaign.

In complex joint campaigns, the combined regulated joint campaign spending will count towards the spending limits for **each** ordinary joint campaigner and lead campaigner involved.

All non-party campaigners involved in the campaign should agree how much each ordinary joint campaigner, lead campaigner and minor campaigner can spend on UK-wide campaigning, national campaigning, and on focused constituency campaigning.

If you are an ordinary joint campaigner, and if the combined spending on the joint campaign is more than £20,000 in England or £10,000 in any of Scotland, Wales or Northern Ireland, you, and all the other ordinary joint campaigners, must register with us. This is in addition to the lead campaigners who will be registered already with us.

Example

You and four other campaigners, A, B, C and D, decide to work together as part of a joint campaign. You have all decided that campaigner A will be a lead campaigner for minor campaigners B and C. You and campaigner D are ordinary joint campaigners. You have also all decided that everyone will spend £1,000 each on a focused constituency campaign in one constituency. Only lead campaigner A is registered.

Since you, lead campaigner A, and ordinary campaigner D spend £1,000 each, a combined focused constituency spend of £3,000 in that particular constituency counts against the constituency limit of £9,750 for each of you.

Since minor campaigners B and C also spend £1,000 each, lead campaigner A must report a minor campaigner focused constituency spend of £2,000 in that constituency. This brings lead campaigner A's spending total to £5,000 on focused constituency campaigning in that constituency.

Since the combined regulated campaign spending will count towards the spending limits for each ordinary campaigner and lead campaigner involved, lead campaigner A's spending total of £5,000 also counts towards your, and ordinary campaigner D's constituency limit of £9,750 in that constituency.

If the combined regulated campaign spending will exceed the registration thresholds of £20,000 in England or £10,000 in any of Scotland, Wales or Northern Ireland, you, and campaigner D must register with us. Minor campaigners B and C do not need to register with us provided they do not exceed these thresholds.

Complex joint campaigns and the constituency spending limit

If you or any other joint campaigner, either separately or together as part of your complex joint campaign:

- spend the whole £9,750 on focused constituency spending in a particular constituency as part of your joint campaign, and
- then spend anything on any other regulated campaigning that is attributed to that constituency

you, and all the other registered non-party campaigners involved in your joint campaign, will breach the constituency spending limit.



Important

How we can help

You can find more information in the guidance documents we have suggested in this document, or you can view our full range of guidance and up-to-date resources on our website.

You can contact us on one of the phone numbers or email addresses below. We are here to help, so please get in touch.

Call us on:

- England: 0333 103 1928
pef@electoralcommission.org.uk
- Scotland: 0333 103 1928
infoscotland@electoralcommission.org.uk
- Wales: 0333 103 1929
infowales@electoralcommission.org.uk
- Northern Ireland: 0333 103 1928
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Visit us at www.electoralcommission.org.uk

We welcome feedback on our guidance – just email us at:
pef@electoralcommission.org.uk
