

Roger Mullin  
East Shop  
Law's Close  
343 High Street  
Kirkcaldy  
KY1 1JN

3 May 2017

Dear Mr Mullin

We have been alerted via social media to an open letter from you addressed to Claire Bassett, Chief Executive of the Electoral Commission. Although we have not yet received a copy of the letter, we thought it would be helpful for you to have an early response. I am responding on behalf of Claire Bassett.

Under the Political Parties, Elections and Referendums Act 2000 (PPERA), there are controls on who can donate, lend money or give credit to political parties registered in Great Britain. These transactions must be recorded and, if above a certain amount, are reportable to us by political parties on a quarterly basis. We publish these reports on our website. Parties must only accept donations and/or loans from permissible, mainly UK-based sources.

To answer your specific questions:

1. Donors or lenders have no legal responsibility to report transactions to the Commission, therefore HSBC and IPGL did not and were not required to inform the Electoral Commission of these transactions
2. Our [online register](#) of donations and loans shows reported donations to the Conservative and Unionist Party from IPGL Limited. When accepting these donations, the Party was responsible for ensuring it was from a permissible source; there is nothing in your letter to suggest it was not.
3. & 4. As we have not been presented with evidence that a breach of PERA has occurred, we will not be taking further action in this matter. Please see our

Enforcement Policy [here](#) for further details, in particular chapter six for details regarding how the Commission handles allegations. The other matters that you have raised regarding governance at IPGL Limited are not matters for the Electoral Commission.

I hope this information is useful. If you require any further assistance, please do not hesitate to contact the Commission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Louise Edwards', written in a cursive style.

**Louise Edwards**  
**Head of Regulation**