

Factsheet for non-party campaigners: Common campaigning techniques: Manifestos

Under the Political Parties, Elections and Referendums Act (PPERA), there are rules on what non-party campaigners can spend on regulated campaign activity in the run-up to certain elections.

Our [guidance](#) explains what campaign activity is regulated and the rules non-party campaigners may need to follow. You should read the guidance before you read this factsheet.

This factsheet explains how to apply the purpose and public tests to non-party campaign election manifestos.

What is covered by these rules?

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

You can find more information on the purpose and public tests in [Overview of regulated non-party campaigning](#).

Election manifestos

Election manifestos can take different forms – ranging from raising issues of concern or proposals that a campaigner is advocating, to

describing or analysing where different political parties or candidates stand on particular issues.

To decide whether spending on an election manifesto is likely to be regulated you will need to decide whether it meets the **purpose** and **public** tests.

Example

A charity working to improve the conditions of children in the care system wants to produce an election manifesto ahead of polling day. The main aims of the manifesto are to raise awareness about the most pressing issues facing children leaving care, to encourage the largest parties in Parliament and their candidates to adopt its policy proposals and to raise the profile of the issue in the run up to the election.

The manifesto outlines a series of policy asks to be taken forward by the next government and Parliament. The charity does not make reference to the views of different parties or how they match against the recommendations put forward in the manifesto. There is no emphasis on which particular party performs better or worse on this issue. The manifesto is published on the charity's website and its release is publicised by the charity through social media.

The election debate has been overshadowed by talk of other issues, and the subject of care does not represent a major or identifiable dividing line between the policies of political parties or categories of candidate.

What does this mean for the campaigner?

Spending on a manifesto will be regulated as election material if the manifesto meets the purpose and public tests.

The manifesto has been published on a publicly available website, so it meets the **public test**.

How to determine whether the manifesto meets the purpose test

You should consider:

Tone

The policy recommendations in the manifesto are presented in a way that does not appear to be negative or positive towards a particular political party or category of candidates.

The manifesto also does not provide a comparison between the different positions of the parties or a category of candidate, or how they coincide or differ with the charity's own policy recommendations.

Context and timing

The issue of the needs of care leavers is not a prominent electoral issue, and there is no political party or category of candidates that are strongly and publicly associated with the policies advanced by the charity.

Although the campaign is set to run through the regulated period, the context and call to action suggest that this is because it is aiming to influence candidates and political parties, not voters.

Call to action

The manifesto is asking MPs and government to support and

implement certain policies in the next Parliament. It is not explicitly or implicitly asking voters to vote for particular parties or categories of candidates. This factor does not meet the purpose test.

If the charity was to produce a manifesto comparing different parties' positions to their own recommendations, spending on the manifesto would be more likely to be regulated.

How a reasonable person would see the activity

As this is not a prominent election issue and the manifesto is not comparing parties or categories of candidates, a reasonable person is not likely to think that the manifesto is intending to influence voting choice.

Based on these factors, the manifesto in this example would not meet the **purpose** test and would not be regulated.

Where you can find more information

We publish a suite of guidance for non-party campaigners which can be found at

<http://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/non-party-campaigners>.

We also offer an advice service and you can contact us on one of the phone numbers or email addresses below. We are here to help, so please get in touch.

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