

[REDACTED]

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**From:** FOI  
**Sent:** 07 June 2023 09:40  
**To:** [REDACTED]  
**Subject:** FOI 059-23 - Response

Dear [REDACTED],

**Our Ref: FOI-059-23**

Thank you for your email to the Electoral Commission dated 9 May 2023.

The Commission aims to respond to requests for information promptly and has done so within the statutory timeframe of twenty working days.

Your request is shown below followed by our response.

*My request relates to correspondence to and from the Electoral Commission from current Members of Parliament or their staff identifiable by using @parliament.uk email addresses on the subject of overseas donations.*

*Please provide any such electronic records held by the Electoral Commission searching from 1st September 2022 to date.*

*I would be grateful if you could confirm that you have received this request. I would also like to ask your department on answering this request to provide a schedule of documents which are relevant to this request. I believe that there should be a brief description of each relevant document including the nature of the document, the date of the document, and whether the document is being released or not. I believe that providing such a schedule would clarify what documents are being released and what is being withheld, and would also represent best practice in open government.*

On 25 May 2023 we wrote to you to ask for clarification of which email addresses we should be considering in our response: @parliament.uk, ministerial, or both. You replied as follows:

*Correspondence to and from both @parliament.uk and ministerial email addresses.*

**Our response is as follows:**

We hold the information you have requested and are releasing to you correspondence between the Electoral Commission and Members of Parliament. We have included in the released documents, all correspondence between Commission staff and any MPs, Peers and their members of staff. In some cases, correspondence with Ministers is addressed to a ministerial email address, rather than a parliamentary email address. We have excluded from the FOI, any correspondence with parliamentary staff not working for an MP or Peer, such as committee clerks.

To access these documents you will need to use our secure document-sharing system, Objective Connect. You will receive an 'Invitation to Objective Connect Email Notification' (sent to the inbox of

[REDACTED]). This notification will contain a link to enable you to start accessing your information. Please find below details on how to access the specific area we have set up for your documents.

1. Click on the link in the email.
2. You will be prompted to set up your username and password. Your username will be your email address, and your password can be whatever you like.
3. With your username and password, enter both details at the login screen and click 'login'.
4. You will now see your personal page, which will show the Share 'FOI 059-23'.
5. By clicking on the name of the share, you will find your documents.
6. You may view any of these documents
7. In addition you may download a copy to your personal computer by selecting the 'download' option and then 'save'.

This service will be closed one month from our response date, this is the **7 July 2023**.

Information is exempt under section 40(2) of the FOIA where release of the information would breach one of the data protection principles in the GDPR. Disclosure of this information would breach the first data protection principle, which states the information must be processed fairly and lawfully. Any personal data that is not already in the public domain has been redacted. We have redacted signatures.

Under this provision, we have also redacted the names/job titles of Commission staff that are not, or have not been part of, our Senior Leadership Group. This is because those members of staff have a reasonable expectation that their personal details will not be made public.

The Commission strives to be an open, transparent authority and I trust that this information satisfies your request.

If you are not satisfied with this response, please note that the Commission operates a review procedure, details of which can be found on the Commission website at:  
<https://www.electoralcommission.org.uk/freedom-information/make-a-freedom-information-request>.

Please also note that if you have exhausted all internal Commission review procedures and you are still not satisfied you have the right to appeal to the Information Commissioner. Details of this procedure can be found on the ICO website: <https://ico.org.uk/>.

Yours sincerely

Information Officer  
[FOI@electoralcommission.org.uk](mailto:FOI@electoralcommission.org.uk)

**The Electoral Commission**  
[electoralcommission.org.uk](https://electoralcommission.org.uk)

The recent spotlight on Russian-linked individuals and their wealth has sparked renewed interest and live concern about foreign influence and money entering UK politics.

For over two decades, there have been laws in place to restrict who can donate to political parties. Legal sources of funding include anyone on a UK electoral register and companies that operate overseas, as long as they are registered in the UK. The Electoral Commission supports parties to comply with the political finance laws, and enforces them. We also help voters see how parties are funded by publicly publishing details of the larger donations for all to see.

But, does existing electoral law do enough to safeguard from unlawful foreign money, or to protect public confidence in the political finance regime? To put it bluntly, no.

The Elections Act, recently passed by the UK parliament, includes measures to restrict election and referendum spending to specified UK-based bodies. This will make clear that foreign interference is not permitted and target those seeking to spend money directly to influence the outcome of UK elections. It is a welcome step forward.

However, the main challenge with an approach which focuses on foreign campaigners is how the provisions would be enforced. Neither the Commission, nor the police, would be able to take effective action against organisations or individuals outside the UK, which immediately dulls its impact.

So what other options could be explored?

There are two proposals that we have put forward, both focus on the recipient of unlawful money.

Firstly, as long as a company is registered at Companies House and “carrying on business” in the UK, it can donate to a political party or campaigner. Companies do not need to show that they have made enough money in the UK to donate.

We have been recommending since 2013 that this situation be reviewed. The law should change to say that parties cannot accept money from companies that have not generated enough in the UK to fund the amount of their donation or loan. This would ensure the money did not originally come from outside the country. This proposal is supported by the Committee on Standards in Public Life

Secondly, we have recommended that the UK Government should introduce a duty on parties similar to anti-money laundering requirements on companies, financial institutions and public sector bodies.

Rather than just checking that the donor is on a UK electoral roll, it would mean parties taking steps to ensure they know where the money has come from. They do not have to do this at the moment.

It has been argued that this is overkill, but since 2019 over £240 million has been donated to political parties in the UK. This is what drives engagement with voters, and the wholly legitimate process of getting political messages across to help people decide how to vote. We need proper transparency.

In any case, these provisions could easily be introduced in a way that recognised the need for proportionality, with different requirements depending on the size of a party's financial infrastructure, or related to the size of a donation. It need not be a big burden on smaller parties.

Recent debate indicates that now is a timely moment to kick start action and strengthen financial checks. We stand ready to work with the UK Government and Parliament and others on how best to improve the controls on donations and loans to prevent foreign money being used in UK politics.

***John Pullinger, Chair of the Electoral Commission***

**From:** [REDACTED]  
**To:** [wallacew@parliament.uk](mailto:wallacew@parliament.uk); [rennarc@parliament.uk](mailto:rennarc@parliament.uk); [andrew.stunell.hq@parliament.uk](mailto:andrew.stunell.hq@parliament.uk); [christine.jardine.mp@parliament.uk](mailto:christine.jardine.mp@parliament.uk)  
**Cc:** [REDACTED]  
**Subject:** Follow-up from meeting last week  
**Date:** 12 September 2022 10:18:00  
**Attachments:** [John Pullinger Telegraph article.docx](#)

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Dear all,

Thank you for taking the time to meet John last week. As mentioned during the meeting, I have attached a copy of his Telegraph article from May on foreign donations. I understand that following last week's news, the party's conference has now been cancelled, but thank you in any case for the offer to accompany John – he hopes to be able to take this up at a future conference.

Best wishes,

[REDACTED]

Rt Hon Tom Tugendhat MBE MP  
Minister for Security

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

23 February 2023

Dear Minister

### **Protecting democracy from foreign interference**

I am writing to follow up my letter to you of 1 November 2022 on the National Security Bill and the UK Government's proposals for a Foreign Influence Registration Scheme, to which I have not yet received a response.

As I highlighted in my letter of 1 November, the Electoral Commission has identified the need to reform existing law to improve security in relation to elections. These changes could usefully be reflected in the National Security Bill, before Parliament completes its consideration. They would introduce stronger controls on donations to political parties and campaigners to address the risk of foreign interference in UK political campaigns. These reforms have also been supported by others, including the Committee on Standards in Public Life and the Public Administration and Constitutional Affairs Committee.

Since writing, I note the Government has rejected amendments to the Bill, tabled during House of Lords Committee stages, to introduce new duties on political parties to make additional checks on donations by overseas voters.

The principles of due diligence and risk assessments when accepting funds are common in many industries. We have recommended stronger controls on donations, to ensure parties and campaigners can only accept donations from companies that have made enough money in the UK to fund their donation; and also strengthening checks on the origin of funding for donations, by introducing enhanced due diligence and risk assessment requirements. These will not only give voters confidence in the integrity of finance, but also protect political parties themselves.

I therefore urge the Government to reconsider its position, and would welcome the opportunity to discuss this in further detail. I am copying this letter to Mr Speaker, the Chair of the Committee on Standards in Public Life and the Chair of the Public Administration and Constitutional Affairs Committee

Yours sincerely,



John Pullinger  
Chair

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Letter from John Pullinger to Security Minister  
**Date:** 23 February 2023 10:29:00  
**Attachments:** [2023-02-23 Pullinger J-to-Rt Hon Tom Tugendhat MP.pdf](#)

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Dear [REDACTED],

I hope you are well.

Please find attached a letter John Pullinger has written to Tom Tugendhat MP in his capacity as Security Minister, which he has asked to copy to Mr Speaker.

I'd be grateful if you could please pass this on, and please let me know if you have any questions.

Best wishes,

[REDACTED]

[REDACTED]

[REDACTED]



**From:** [REDACTED]  
**To:** [william.wragg.mp@parliament.uk](mailto:william.wragg.mp@parliament.uk)  
**Cc:** [pacac@parliament.uk](mailto:pacac@parliament.uk)  
**Subject:** Letter from John Pullinger to Security Minister  
**Date:** 23 February 2023 11:02:00  
**Attachments:** [2023-02-23 Pullinger J-to-Rt Hon Tom Tugendhat MP.pdf](#)

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Dear Mr Wragg,

Please find attached a letter John Pullinger, Chair of the Electoral Commission, has written to Tom Tugendhat MP in his capacity as Security Minister. John has asked me to share a copy with you.

Please let me know if you have any questions.

Best wishes,

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [cat.smith.mp@parliament.uk](mailto:cat.smith.mp@parliament.uk)  
**Cc:** [REDACTED] [Craig](#) [REDACTED]  
**Subject:** OPQs - Electoral Commission  
**Date:** 07 March 2023 14:06:00  
**Attachments:** [OPQ-903959 - Oswald - 2023-03-09.docx](#)

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Dear Cat,

Please find attached the packs for Electoral Commission OPQs on Thursday.

Craig and [REDACTED] will brief you tomorrow but please let me know if you need anything else in the meantime.

Best wishes,

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [cat.smith.mp@parliament.uk](mailto:cat.smith.mp@parliament.uk)  
**Cc:** [REDACTED]  
**Subject:** OPQs - Electoral Commission  
**Date:** 29 November 2022 13:09:00  
**Attachments:** [OPQ - 902564, 902567 - Brown and Thompson - 2022-12-01.docx](#)

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Dear Cat,

Ahead of questions to Speaker's Committee on the Electoral Commission on Thursday, please find attached three packs for the questions we have received.

[REDACTED] will brief you on these tomorrow at 11:30am.

Best wishes,

[REDACTED]

[REDACTED]

[REDACTED]



Department for Levelling Up,  
Housing & Communities

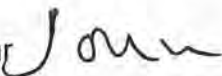
**Baroness Scott**  
*Parliamentary Under Secretary of State*

**Department for Levelling Up, Housing and  
Communities**  
Fry Building  
2 Marsham Street  
London  
SW1P 4DF

John Pullinger  
The Electoral Commission  
3 Bunhill Row  
London EC1Y 8YZ

[www.gov.uk/dluhc](http://www.gov.uk/dluhc)

1 May 2023

Dear 

Thank you for your letters to me and the Security Minister regarding protecting our elections from foreign interference and for outlining the Commission's views during our recent introductory meeting. I am responding as the regulation of political donations falls within my ministerial responsibilities. Please accept my apologies for the delay in responding to you.

The Government takes the risk of foreign interference very seriously and recognises the need to respond to threats to the UK's democratic processes and institutions. Last year, the government established the Defending Democracy Taskforce which will drive work to protect the democratic integrity of the UK from threats of foreign interference.

As part of this, the National Security Bill will provide the security services and law enforcement with the tools they need to detect and disrupt state threats activity, including a new offence of foreign interference. This new offence is designed to capture malign interference targeted at the UK. Additionally, where the foreign power condition<sup>1</sup> is met in relation to a relevant electoral offence as set out in Schedule 1 of this Bill, clause 16 provides for a substantially increased maximum penalty. These relevant electoral offences include offences of undue influence, which has been increased to 7 years, and making a false declaration about the source of a donation has been increased to 4 years.

Further, the Foreign Influence Registration Scheme will require the registration of arrangements to carry out political influence activities in the UK at the direction of a foreign power in order to increase transparency and help safeguard UK democratic institutions from covert foreign influence.

The Government's view is that Lord Carlile's amendment to the National Security Bill is not necessary. As the Security Minister made clear at the despatch box, political donations from foreign powers – whether made directly or indirectly – are already illegal under the existing legislation.

<sup>1</sup> The foreign power condition is met if a person's conduct (or a course of conduct) is carried out for or on behalf of, or with the intention to benefit, a foreign power. In addition, for the condition to be met, the person must know, or reasonably ought to know, that the conduct has that relationship to the foreign power. The relationship can be a direct or indirect one.

There are also already provisions which explicitly prohibit money being funnelled through permissible donors on behalf of impermissible donors and it is an offence for donors and campaigners to purposefully evade the rules.

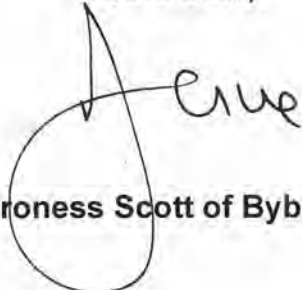
As the Security Minister noted, as well as being unnecessary, Lord Carlile's amendment seeks to place new requirements on all political parties in the UK, including minor parties (as defined in the Political Parties, Elections and Referendums Act 2000), who are not subject to any other financial reporting requirements and can only contest parish and community council elections.

Furthermore, the Government is already legislating via the Economic Crime and Corporate Transparency Bill to enhance data sharing between Companies House and public authorities, including the Electoral Commission. This will indirectly support the enforcement of the rules on donations, by providing greater confidence in the accuracy of the data held at Companies House and facilitating checks that the Commission may undertake.

Of course, the Government keeps the rules on donations under review to ensure they continue to provide an effective safeguard on the integrity of our political system. The Government responded to the report published by the CSPL on 'Regulating Election Finance' in September 2021, and the Elections Act contains several measures that closely link to recommendations made in that report. I welcome the report by the Public Administration and Constitutional Affairs Committee into the 'Work of the Electoral Commission' and the Government responded in full in January.

Thank you for your interest in this important area.

Yours ever,



Baroness Scott of Bybrook

Daniel Kawczynski MP  
House of Commons  
London SW1A 0AA

20 April 2023

Dear Mr Kawczynski,

I am writing in response to the concerns you have raised about the laws on the permissibility of donations from foreign nationals.

I understand that you want to ensure adequate levels of funding for party associations. However, Parliament established restrictions on the sources of political donations in the Political Parties, Elections and Referendums Act 2000 (PPERA), prior to the creation of the Electoral Commission. These restrictions were introduced in response to concerns about foreign influence, following recommendations from the Committee on Standards in Public Life.

In Great Britain, individuals who are registered on a UK electoral register, including overseas electors and those leaving bequests, are permissible donors. A donation from a foreign national would therefore be impermissible unless the donor were registered on a UK electoral register. Further information on permissible sources is [available on our website](#), taken from [section 54 of PERA](#). The law requires the refusal of any impermissible donation, or its return to the donor within 30 days of receipt.

If you have any further questions regarding the law on permissible donations, I would be happy to meet you to discuss them.

Yours sincerely,



Louise Edwards  
Director of Regulation



# Parliamentary briefing: National Security Bill

December 2022

The Electoral Commission is the independent body which oversees elections and regulates political finance in the UK. We work to promote public confidence in the democratic process and ensure its integrity. A key part of our role is to provide advice to government and parliament on legislation relating to elections.

The briefing provides information to help consideration of the National Security Bill – in particular the sections that relate to elections and proposed changes to the Political Parties, Elections and Referendums Act 2000, as well as the introduction of the Foreign Interference Registration Scheme (FIRS).

## Introduction

- The FIRS has been introduced to the Bill by government amendment. The scheme aims to deter use by foreign powers of covert arrangements, activities and proxies. It does this by seeking greater transparency around certain activities that foreign powers direct, as well as where those activities are directed or carried out by entities established overseas or subject to foreign power control.

## Key Considerations

- Voters deserve to know that elections in the UK are free and fair, and that laws are in place to safeguard them from unlawful influence. Transparency of political finance is crucial to support public confidence.
- We have recommended in our [digital campaigning report](#) and elsewhere that the UK Government and Parliament should consider the need for stronger controls on donations and loans to political parties and campaigners to address the risk of foreign interference in UK political campaigns.
- This includes additional duties for regulated entities, including political parties and campaigners, to check the true source of donations and assess the risk of accepting donations including from overseas. This would help strengthen the regime, protect elections from unlawful influence and improve transparency for voters.
- In this area the Commission has made two key recommendations:
  - Government should strengthen the law to make clear that parties and campaigners cannot accept donations from companies that have not made enough money in the UK to fund them.
  - Introduce new requirements for parties and campaigners to carry out enhanced due diligence and risk assessments before they accept donations, adapted from existing anti-money laundering (AML) regulations.

**Our recommendation: Strengthen the law to make clear that parties and campaigners cannot accept donations from companies that have not made enough money in the UK to fund them**

- Currently, as long as a company is registered at Companies House and ‘carrying on business’ in the UK, it can donate to a UK political party or campaigner.
- A company does not need to show it has made enough money in the UK to give or lend to campaigners, meaning that campaigners can lawfully receive money which originating outside the UK. This could include goods or services companies give to campaigners as a gift or at a discount, including digital campaign services.
- We have recommended that controls on company donations be strengthened. The law should change to prevent any regulated entities, for example political parties and non-party campaigners, accepting money from companies that have not made enough in the UK to fund the amount of their donation or loan.
- Given the context of multinational company structures and the possibility of intra-company/director transfers, there is a high risk that money to fund donations could originate from outside the UK. This change would reduce the likelihood of this risk materialising.

**Our recommendation: Introduce new requirements for parties and campaigners to carry out enhanced due diligence and risk assessments before they accept donations, adapted from existing anti-money laundering (AML) regulations**

- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations (2017) are designed to prevent criminals laundering money. They require certain companies and professional organisations to have processes in place to mitigate the risk of receipt of proceeds of crime. They are known as the “AML regulations” and have been updated over the past decade as part of the implementation of EU money laundering directives.
- Enhanced due diligence and risk assessment processes would help campaigners identify foreign money, identify potential proceeds of crime, and establish a culture of ‘know your donor’ within parties – similar to the ‘know your customer’ (KYC) approach, encouraged through AML regulations for the financial sector.
- This could be done by requiring campaigners to carry out additional checks, like:
  - Risk assessments (these could cover typical donors/lenders, geographical connections of donors/lenders etc).
  - Enhanced due diligence for new donors (e.g. on the principal place of business if not the registered office; the law a donor is subject to and its governing documentation; the names of directors or those responsible for operations)
  - Specified procedures for record keeping, monitoring and management of compliance with, and internal communication of, the policies.
- These requirements could be introduced in a way that recognises the need for proportionality, with different requirements depending on the size of a regulated entity’s financial infrastructure, or the size of a donation, to prevent the checks becoming a disproportionate burden on smaller parties and campaigners.

If you require any further information, please contact [REDACTED] in our public affairs team at [REDACTED]



# Parliamentary briefing: National Security Bill – Consideration of Amendments Stage, 3 May

**02 May 2023**

This briefing sets out the Electoral Commission's views on clauses and amendments in the National Security Bill ahead of the Consideration of Amendments stage on Wednesday 3 May.

We have not commented on all clauses or amendments tabled, so the absence of comment does not imply support. Decisions on permissible sources of donations are important constitutional issues for Parliament to decide on, although the Commission will comment on the practical implications of amendments in these areas where appropriate.

## Part 1 Foreign Interference

### Amendment 22

The new clause inserted after Clause 14 by amendment 22 (**Lord Carlile of Berriew, Lord Wallace of Saltaire, Baroness Hayter of Kentish Town and Lord Evans of Weardale**) places new requirements on political parties to identify and report on donations from foreign powers. The amendment passed on division by 209 Content to 170 Not Content during Report Stage in the House of Lords.

#### Key Considerations

Voters deserve to know that elections in the UK are free and fair, and that laws are in place to safeguard them from unlawful influence. Transparency of political finance is crucial to supporting public confidence.

We have recommended since 2018 – including in our [digital campaigning report](#) – that the UK Government and Parliament should consider the need for stronger controls on donations and loans to political parties and campaigners to address the risk of foreign interference in UK political campaigns.

This would include additional duties for regulated entities, including political parties and campaigners, to check the true source of donations and assess the risk of accepting donations including from overseas. It would help strengthen the regime, protect elections from unlawful influence and improve transparency for voters.

The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations (2017) are designed to prevent criminals laundering money. They require certain companies and professional organisations to have processes in place to mitigate the risk of receiving proceeds of crime. They are known as the anti money laundering (AML) regulations and have been updated over the past decade as part of the implementation of EU money laundering directives.

Enhanced due diligence and risk assessment processes would help campaigners identify foreign money, identify potential proceeds of crime, and establish a culture of 'know your donor' within parties – similar to the 'know your customer' approach, encouraged through AML regulations for the financial sector.

This could be achieved by requiring campaigners to carry out additional checks, for example:

- Risk assessments (these could cover typical donors/lenders, geographical connections of donors/lenders etc)
- Enhanced due diligence for new donors (e.g. on the principal place of business if not the registered office; the law a donor is subject to and its governing documentation; the names of directors or those responsible for operations)
- Specified procedures for record keeping, monitoring and management of compliance with, and internal communication of, the policies.

These requirements could be introduced in a way that recognises the need for proportionality, with different requirements depending on the size of a regulated entity's financial infrastructure, or the size of a donation, to prevent the checks becoming a disproportionate burden on smaller parties and campaigners.

The Electoral Commission is the independent body which oversees elections and regulates political finance in the UK. If you require any further information, please contact [REDACTED] in our public affairs team at [REDACTED]

[REDACTED]

---

**From:** WALLACE OF SALTAIRE, Lord <WALLACEW@parliament.uk>  
**Sent:** 08 December 2022 15:59  
**To:** [REDACTED]  
**Cc:** [REDACTED] STUNELL, Lord; RENNARD, Lord; PLUMMER, Elizabeth; PURVIS OF TWEED, Lord  
**Subject:** RE: National Security Bill - briefing with the Electoral Commission

Thanks. Yes please, I will join in this.

William Wallace  
(Lord Wallace of Saltaire)

---

**From:** [REDACTED] <[REDACTED]>  
**Sent:** 08 December 2022 13:16  
**To:** WALLACE OF SALTAIRE, Lord <WALLACEW@parliament.uk>  
**Cc:** [REDACTED]  
**Subject:** National Security Bill - briefing with the Electoral Commission

Dear Lord Wallace,

I am writing to invite you to an Electoral Commission briefing in advance of the Committee Stage of the National Security Bill.

The briefing will take place on Wednesday 14 December at 10am and will be a chance to discuss the elements of the Bill that relate to political finance and the electoral process with our Director of Regulation, Louise Edwards. The meeting will take place virtually and a link will follow.

Please respond confirming your attendance by Tuesday 13 December.

Yours sincerely,

[REDACTED]

[REDACTED]

Senior Communications Officer (Public Affairs)

**The Electoral Commission**

[REDACTED]

[electoralcommission.org.uk](https://electoralcommission.org.uk)

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 28 February 2023 13:42  
**To:** carlilea@parliament.uk  
**Subject:** National Security Bill: Electoral Commission briefing  
**Attachments:** Parliamentary briefing - House of Lords Report stage National Security Bill 28-02-23.pdf

Dear Lord Carlile

Please find attached a short briefing from the Electoral Commission to assist with your consideration of the National Security Bill which is due to begin Report stage tomorrow (1 March).

If you have any questions, please don't hesitate to ask.

Yours sincerely,

[REDACTED]

[REDACTED]  
Public Affairs Manager

**The Electoral Commission**

[REDACTED]  
[electoralcommission.org.uk](https://electoralcommission.org.uk)

**From:** [REDACTED]  
**To:** [hayterd@parliament.uk](mailto:hayterd@parliament.uk)  
**Subject:** National Security Bill: Electoral Commission briefing  
**Date:** 28 February 2023 12:42:00  
**Attachments:** [Parliamentary briefing - House of Lords Report stage National Security Bill 28-02-23.pdf](#)

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Dear Baroness Hayter

Please find attached a short briefing from the Electoral Commission to assist with your consideration of the National Security Bill which is due to begin Report stage tomorrow (1 March).

If you have any questions, please don't hesitate to ask.

Yours sincerely,

[REDACTED]

[REDACTED]

Public Affairs Manager

**The Electoral Commission**

[REDACTED]

[electoralcommission.org.uk](https://electoralcommission.org.uk)

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 07 December 2022 11:56  
**To:** carmichaela@parliament.uk  
**Cc:** [REDACTED] Craig Westwood  
**Subject:** Electoral Commission briefing: National Security Bill  
**Attachments:** Electoral Commission briefing - National Security Bill.pdf

Dear Mr Carmichael

Following yesterday's Second Reading of the National Security Bill in the House of Lords, I wanted to share with you a briefing the Electoral Commission sent to all Peers in advance of the debate which I hope will be useful. It highlights the Commission's recommendations on the need for stronger controls on donations and loans to political parties and campaigners to address the risk of foreign interference in UK political campaigns.

Please do let me know if you have any questions.

Yours sincerely,

[REDACTED]

[REDACTED]  
Public Affairs Manager

**The Electoral Commission**

[REDACTED]  
[electoralcommission.org.uk](https://electoralcommission.org.uk)

**From:** [REDACTED]  
**To:** [carmichaela@parliament.uk](mailto:carmichaela@parliament.uk)  
**Subject:** National Security Bill  
**Date:** 02 May 2023 14:00:00  
**Attachments:** [Electoral Commission Parliamentary briefing National Security Bill 03-05-23.pdf](#)

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Dear Mr Carmichael

Please find attached a briefing from the Electoral Commission in advance of Consideration of Amendments to the National Security Bill.

If you have any further questions, please do let me know.

Yours sincerely,

[REDACTED]

[REDACTED]  
Public Affairs Manager

**The Electoral Commission**  
[REDACTED]  
[electoralcommission.org.uk](https://electoralcommission.org.uk)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 07 December 2022 11:44  
**To:** coopery@parliament.uk  
**Cc:** [REDACTED] Craig Westwood  
**Subject:** Electoral Commission briefing: National Security Bill  
**Attachments:** Electoral Commission briefing - National Security Bill.pdf

Dear Ms Cooper

Following yesterday's Second Reading of the National Security Bill in the House of Lords, I wanted to share with you a briefing the Electoral Commission sent to all Peers in advance of the debate which I hope will be useful. It highlights the Commission's recommendations on the need for stronger controls on donations and loans to political parties and campaigners to address the risk of foreign interference in UK political campaigns.

Please do let me know if you have any questions.

Yours sincerely,

[REDACTED]

[REDACTED]  
Public Affairs Manager

**The Electoral Commission**

[REDACTED]  
[electoralcommission.org.uk](https://electoralcommission.org.uk)



**From:** [REDACTED]  
**To:** [KAWCZYNSKI, Daniel \(2nd Mailbox\)](#)  
**Cc:** [REDACTED] [@parliament.uk](#)  
**Subject:** RE: Fund Raising concerns request to meet Chief Executive of Electoral Commission  
**Date:** 20 April 2023 16:03:00  
**Attachments:** [EdwardsL-to-KawczynskiD\\_Apr23.pdf](#)  
[image001.gif](#)

---

Dear Mr Kawczynski

Thank you for your email. Please find attached in response a letter from our Director of Regulation, Louise Edwards.

Yours sincerely,

[REDACTED]

[REDACTED]

Public Affairs Manager

**The Electoral Commission**

[REDACTED]

[electoralcommission.org.uk](https://electoralcommission.org.uk)

---

**From:** [REDACTED]  
**Sent:** Thursday, April 20, 2023 12:01 PM  
**To:** KAWCZYNSKI, Daniel (2nd Mailbox) <[kawczynskid2@parliament.uk](mailto:kawczynskid2@parliament.uk)>  
**Cc:** [REDACTED] <[REDACTED]>;  
[REDACTED] [@parliament.uk](#)  
**Subject:** RE: Fund Raising concerns request to meet Chief Executive of Electoral Commission

Dear Mr Kawczynski

Thank you for your email. I am just writing to let you know that we have received it and will be responding to you as quickly as we can.

Best wishes,

[REDACTED]

[REDACTED]

Public Affairs Manager

**The Electoral Commission**

[REDACTED]

[electoralcommission.org.uk](https://electoralcommission.org.uk)

---

**From:** KAWCZYNSKI, Daniel (2nd Mailbox) <[kawczynskid2@parliament.uk](mailto:kawczynskid2@parliament.uk)>  
**Sent:** Thursday, April 20, 2023 11:45 AM

**To:** [REDACTED]  
**Cc:** [REDACTED] <[\[REDACTED\]@parliament.uk](mailto:[REDACTED]@parliament.uk)>; BRADY, Graham  
<[graham.brady.mp@parliament.uk](mailto:graham.brady.mp@parliament.uk)>; [Simonhartmp@gmail.com](mailto:Simonhartmp@gmail.com); CHURCHILL, Jo (2nd Mailbox)  
<[jo.churchill.2nd@parliament.uk](mailto:jo.churchill.2nd@parliament.uk)>  
**Subject:** Fund Raising concerns request to meet Chief Executive of Electoral Commission  
**Importance:** High

**Electoral Commission**

Dear Sir,

I instinctively believe that the duty of a MP is to help to raise funds for their local Association Party. These volunteers work very hard, delivering leaflets and campaigning. There are many very high associated costs with running a constituency based Association office and having the resources to pay for staff.

The constituency Party Association plays a vital role in our democratic process. The Government contributed a great deal of tax payers money during the pandemic to hundreds of thousands of organisations and yet no money was afforded to these political parties, despite them facing similar pressures

I have today an event in London to raise funds for my local Association and 180 people are attending this concert and auction. I have been offered a donation of **£10,000** from a Mongolian friend. My understanding is that we can only take donations from British passport holders. I have a concern with this and would like to seek clarification from you in writing if indeed that is the case.

I do not understand why British passport holders should be treated differently from foreign passport holders when it comes to political parties. This is not the case in many jurisdictions around the world.

In addition, would you kindly send me the definitive section of your rules highlighting who is allowed to make a political donation.

I feel so strongly on this matter I would like to request a personal meeting with your Chief Executive Mr Seann McNally to discuss my concerns.

I am copying in my Senior Parliamentary Assistant [REDACTED], who will be able to facilitate a mutually convenient time for me to invite Mr McNally to the House

I look forward to hearing from you

Daniel



**Daniel Kawczynski MP**  
Shrewsbury & Atcham  
House of Commons

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 28 February 2023 12:43  
**To:** contactholm@parliament.uk  
**Subject:** National Security Bill: Electoral Commission briefing  
**Attachments:** Parliamentary briefing - House of Lords Report stage National Security Bill 28-02-23.pdf

Dear Lord Coaker

Please find attached a short briefing from the Electoral Commission to assist with your consideration of the National Security Bill which is due to begin Report stage tomorrow (1 March).

If you have any questions, please don't hesitate to ask.

Yours sincerely,

[REDACTED]

[REDACTED]  
Public Affairs Manager

**The Electoral Commission**  
[REDACTED]  
[electoralcommission.org.uk](http://electoralcommission.org.uk)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 February 2023 12:43  
**To:** contactholm@parliament.uk  
**Subject:** National Security Bill: Electoral Commission briefing  
**Attachments:** Parliamentary briefing - House of Lords Report stage National Security Bill 28-02-23.pdf

Dear Lord Evans

Please find attached a short briefing from the Electoral Commission to assist with your consideration of the National Security Bill which is due to begin Report stage tomorrow (1 March).

If you have any questions, please don't hesitate to ask.

Yours sincerely,

[REDACTED]

[REDACTED]  
Public Affairs Manager

**The Electoral Commission**  
[REDACTED]  
[electoralcommission.org.uk](https://electoralcommission.org.uk)

**From:** [REDACTED]  
**To:** [contactholmemb@parliament.uk](mailto:contactholmemb@parliament.uk)  
**Subject:** National Security Bill: Electoral Commission briefing  
**Date:** 28 February 2023 12:43:00  
**Attachments:** [Parliamentary briefing - House of Lords Report stage National Security Bill 28-02-23.pdf](#)

---

Dear Lord Paddick

Please find attached a short briefing from the Electoral Commission to assist with your consideration of the National Security Bill which is due to begin Report stage tomorrow (1 March).

If you have any questions, please don't hesitate to ask.

Yours sincerely,

[REDACTED]

[REDACTED]

Public Affairs Manager

**The Electoral Commission**

[REDACTED]

[electoralcommission.org.uk](http://electoralcommission.org.uk)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 February 2023 12:43  
**To:** contactholm@parliament.uk  
**Subject:** National Security Bill: Electoral Commission briefing  
**Attachments:** Parliamentary briefing - House of Lords Report stage National Security Bill 28-02-23.pdf

Dear Lord Ponsonby

Please find attached a short briefing from the Electoral Commission to assist with your consideration of the National Security Bill which is due to begin Report stage tomorrow (1 March).

If you have any questions, please don't hesitate to ask.

Yours sincerely,

[REDACTED]

[REDACTED]  
Public Affairs Manager

**The Electoral Commission**  
[REDACTED]  
[electoralcommission.org.uk](https://electoralcommission.org.uk)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 February 2023 12:43  
**To:** contactholm@parliament.uk  
**Subject:** National Security Bill: Electoral Commission briefing  
**Attachments:** Parliamentary briefing - House of Lords Report stage National Security Bill 28-02-23.pdf

Dear Lord Purvis

Please find attached a short briefing from the Electoral Commission to assist with your consideration of the National Security Bill which is due to begin Report stage tomorrow (1 March).

If you have any questions, please don't hesitate to ask.

Yours sincerely,

[REDACTED]

[REDACTED]  
Public Affairs Manager

**The Electoral Commission**  
[REDACTED]  
[electoralcommission.org.uk](http://electoralcommission.org.uk)



[REDACTED]

---

**From:** WALLACE OF SALTAIRE, Lord <WALLACEW@parliament.uk>  
**Sent:** 28 February 2023 15:03  
**To:** [REDACTED]  
**Subject:** RE: National Security Bill: Electoral Commission briefing

Thanks for this. Do circulate as widely as you can!

William Wallace  
(Lord Wallace of Saltaire)

---

**From:** [REDACTED]  
**Sent:** 28 February 2023 12:43  
**To:** WALLACE OF SALTAIRE, Lord <WALLACEW@parliament.uk>  
**Subject:** National Security Bill: Electoral Commission briefing

Dear Lord Wallace

Please find attached a short briefing from the Electoral Commission to assist with your consideration of the National Security Bill which is due to begin Report stage tomorrow (1 March).

If you have any questions, please don't hesitate to ask.

Yours sincerely,

[REDACTED]

[REDACTED]  
Public Affairs Manager

**The Electoral Commission**  
[REDACTED]  
[electoralcommission.org.uk](http://electoralcommission.org.uk)

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 02 May 2023 13:59  
**To:** holly.lynch.mp@parliament.uk  
**Subject:** National Security Bill  
**Attachments:** Electoral Commission Parliamentary briefing National Security Bill 03-05-23.pdf

Dear Ms Lynch

Please find attached a briefing from the Electoral Commission in advance of Consideration of Amendments to the National Security Bill.

If you have any further questions, please do let me know.

Yours sincerely,

[REDACTED]

[REDACTED]

**The Electoral Commission**

[REDACTED]  
[electoralcommission.org.uk](https://electoralcommission.org.uk)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 07 December 2022 11:48  
**To:** holly.lynch.mp@parliament.uk  
**Cc:** [REDACTED] Craig Westwood  
**Subject:** Electoral Commission briefing: National Security Bill  
**Attachments:** Electoral Commission briefing - National Security Bill.pdf

Dear Ms Lynch

Following yesterday's Second Reading of the National Security Bill in the House of Lords, I wanted to share with you a briefing the Electoral Commission sent to all Peers in advance of the debate which I hope will be useful. It highlights the Commission's recommendations on the need for stronger controls on donations and loans to political parties and campaigners to address the risk of foreign interference in UK political campaigns.

Please do let me know if you have any questions.

Yours sincerely,

[REDACTED]

[REDACTED]  
Public Affairs Manager

**The Electoral Commission**

[REDACTED]  
[electoralcommission.org.uk](https://electoralcommission.org.uk)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 07 December 2022 11:58  
**To:** stuart.mcdonald.mp@parliament.uk  
**Cc:** [REDACTED] Craig Westwood  
**Subject:** Electoral Commission briefing: National Security Bill  
**Attachments:** Electoral Commission briefing - National Security Bill.pdf

Dear Mr McDonald

Following yesterday's Second Reading of the National Security Bill in the House of Lords, I wanted to share with you a briefing the Electoral Commission sent to all Peers in advance of the debate which I hope will be useful. It highlights the Commission's recommendations on the need for stronger controls on donations and loans to political parties and campaigners to address the risk of foreign interference in UK political campaigns.

Please do let me know if you have any questions.

Yours sincerely,

[REDACTED]

[REDACTED]  
Public Affairs Manager

**The Electoral Commission**

[REDACTED]  
[electoralcommission.org.uk](https://electoralcommission.org.uk)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 02 May 2023 14:02  
**To:** alison.thewliss.mp@parliament.uk  
**Subject:** National Security Bill  
**Attachments:** Electoral Commission Parliamentary briefing National Security Bill 03-05-23.pdf

Dear Ms Thewliss

Please find attached a briefing from the Electoral Commission in advance of Consideration of Amendments to the National Security Bill.

If you have any further questions, please do let me know.

Yours sincerely,

[REDACTED]

[REDACTED]  
Public Affairs Manager

**The Electoral Commission**  
[REDACTED]  
[electoralcommission.org.uk](https://electoralcommission.org.uk)

Original document	Extract
<p>Oral parliamentary questions pack sent to Chris Matheson – 5 September 2022.</p> <p>From the section on possible supplementary questions</p>	<p><b>What steps is the Commission taking to prevent foreign money being used to influence our democratic system?</b></p> <p>The Commission says that it is committed to ensuring political funding is transparent, and to preventing unlawful foreign money from entering UK politics.</p> <p>It continues to recommend changes to the law to ensure voters can have greater confidence in political finance in the UK. This includes recommendations for new duties on parties for enhanced due diligence and risk assessment of donations, and changes to the law to ensure companies have made enough money in the UK to fund any donations.</p>
<p>Oral parliamentary questions pack sent to Cat Smith – 30 November 2022.</p> <p>From the section on possible supplementary questions</p>	<p>[Any question on foreign donations]</p> <p>The Commission is committed to ensuring political funding is transparent, and to preventing unlawful foreign money from entering UK politics.</p> <p>It continues to recommend changes to the law to ensure voters can have greater confidence in political finance in the UK. These include new duties on parties for enhanced due diligence and risk assessment of donations, and a requirement for companies to have made enough money in the UK to fund any donations.</p>
<p>Email to all members of the House of Lords, sharing a link to the Commission's briefing on the National Security Bill – 5 December 2022</p>	<p><b>Electoral Commission briefing: National Security Bill</b></p> <p>Please <a href="#">find here a briefing</a> from the Electoral Commission in advance of tomorrow's National Security Bill Second Reading debate.</p> <p>The briefing provides information to help consideration of the Bill – in particular the sections that relate to elections and proposed changes to the Political Parties, Elections and Referendums Act 2000, as well as the introduction of the Foreign Interference Registration Scheme (FIRS).</p>
<p>Oral parliamentary questions pack sent to Cat Smith MP – 7 March 2023</p> <p>From the section on possible supplementary questions</p>	<p><b>Is there foreign money in UK politics?</b></p> <p>It is a matter for the security services to assess whether unlawful foreign money has been used to campaign at UK elections.</p> <p>The Commission has highlighted vulnerabilities in the system which could allow the use of unlawful foreign money. Political parties are not currently required to carry out any checks on donations beyond establishing that a donor is permissible.</p>

	<p>It continues to recommend that parties be required to conduct enhanced due diligence checks on donations, in line with anti-money laundering checks in the financial system.</p> <p><b>What is the Commission doing to prevent foreign money from entering UK politics?</b></p> <p>The Commission is committed to preventing unlawful foreign money from entering UK politics.</p> <p>It publishes information about donations to ensure transparency and has powers to sanction political parties which accept impermissible foreign donations. However, it cannot take enforcement action against organisations based outside the UK.</p> <p>The Commission will continue to recommend changes to the law to ensure voters can have greater confidence in political finance in the UK.</p> <p><b>Will the National Security Bill help tackle foreign interference in elections?</b></p> <p>The National Security Bill includes measures to tackle foreign interference in the UK's political processes, but could enhance the security of the political finance system by introducing additional safeguards.</p> <p>These include recommendations from the Commission, and the Committee on Standards in Public Life, to require political parties to conduct enhanced checks on donations, and to prevent companies from donating more than their UK profits.</p>
<p>Oral parliamentary questions pack sent to Cat Smith – 25 January 2023</p> <p>From the section on possible supplementary questions</p>	<p>[Any question on foreign donations]</p> <p>The Commission is committed to ensuring political funding is transparent, and to preventing unlawful foreign money from entering UK politics.</p> <p>It continues to recommend changes that the UK Government and Parliament could consider to improve controls on donations and loans to political parties, in order to strengthen voter confidence in UK political finance.</p> <p><b>Does the Commission view the National Security Bill as a missed opportunity to strengthen controls on foreign donations?</b></p> <p>The National Security Bill includes measures to tackle foreign interference in the UK's political processes, but could provide additional security by incorporating additional recommendations.</p> <p>This would include strengthening existing controls on donations and loans to political parties and campaigners, such as enhanced due diligence checks based on anti-money laundering regulations.</p>

## Niki Nixon

---

**From:** Niki Nixon  
**Sent:** 05 September 2022 14:11  
**To:** 'chris.matheson.mp@parliament.uk'  
**Cc:** [REDACTED]; [REDACTED]; Craig Westwood  
**Subject:** OPQ briefing - Electoral Commission  
**Attachments:** OPQ- 901369, 901376, 901377 - Dorans, Thompson, Day - 2022-09-08.docx; OPQ- 901371 - Fellows - 2022-09-08.docx; OPQ- 901374 - Gibson - 2022-09-08.docx

Dear Chris,

Please find attached the briefing packs for this week's OPQs.

Craig and I will join the call on Wednesday to brief you.

Best wishes,  
Niki

**Niki Nixon**

Head of External Communications

**The Electoral Commission**

020 7271 0535

07825 188963

[electoralcommission.org.uk](https://electoralcommission.org.uk)



# Parliamentary briefing: National Security Bill – House of Lords Report Stage, 1 March

28 February 2023

This briefing sets out the Electoral Commission's views on clauses and amendments tabled for Report Stage consideration of the National Security Bill in the House of Lords.

We have not commented on all clauses or amendments tabled, so the absence of comment does not imply support. Decisions on permissible sources of donations are important constitutional issues for Parliament to decide on, although the Commission will comment on the practical implications of amendments in these areas where appropriate.

## Part 1 Foreign Interference

### Amendment 51

The new clause inserted after Clause 16 by amendment 51 (**Lord Carlile of Berriew, Lord Wallace of Saltaire, Baroness Hayter of Kentish Town and Lord Evans of Weardale**) would place new requirements on political parties to identify and report on donations from foreign powers.

#### Key Considerations

Voters deserve to know that elections in the UK are free and fair, and that laws are in place to safeguard them from unlawful influence. Transparency of political finance is crucial to supporting public confidence.

We have recommended since 2018 – including in our [digital campaigning report](#) – that the UK Government and Parliament should consider the need for stronger controls on donations and loans to political parties and campaigners to address the risk of foreign interference in UK political campaigns.

This would include additional duties for regulated entities, including political parties and campaigners, to check the true source of donations and assess the risk of accepting donations including from overseas. It would help strengthen the regime, protect elections from unlawful influence and improve transparency for voters.

The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations (2017) are designed to prevent criminals laundering money. They require certain companies and professional organisations to have processes in place to mitigate the risk of receipt of proceeds of crime. They are known as the “AML regulations” and have been updated over the past decade as part of the implementation of EU money laundering directives.

Enhanced due diligence and risk assessment processes would help campaigners identify foreign money, identify potential proceeds of crime, and establish a culture of ‘know your donor’ within parties – similar to the ‘know your customer’ (KYC) approach, encouraged through AML regulations for the financial sector.

This could be achieved by requiring campaigners to carry out additional checks, for example:

- Risk assessments (these could cover typical donors/lenders, geographical connections of donors/lenders etc)
- Enhanced due diligence for new donors (e.g. on the principal place of business if not the registered office; the law a donor is subject to and its governing documentation; the names of directors or those responsible for operations)
- Specified procedures for record keeping, monitoring and management of compliance with, and internal communication of, the policies

These requirements could be introduced in a way that recognises the need for proportionality, with different requirements depending on the size of a regulated entity’s financial infrastructure, or the size of a donation, to prevent the checks becoming a disproportionate burden on smaller parties and campaigners.

The Electoral Commission is the independent body which oversees elections and regulates political finance in the UK. If you require any further information, please contact [REDACTED] in our public affairs team at [REDACTED]

**From:** [REDACTED]  
**To:** "NORRIS, Alex"  
**Subject:** RE: Constitutional Review and Electoral Commission powers  
**Date:** 07 October 2022 10:24:00

---

Dear [REDACTED]

Thanks for your email – someone from our Public Affairs Team will be in touch shortly to set something up.

Best wishes

---

**From:** NORRIS, Alex <alex.norris.mp@parliament.uk>

**Sent:** 06 October 2022 3:15 PM

**To:** Chair <Chair@electoralcommission.org.uk>

**Subject:** FW: Constitutional Review and Electoral Commission powers

Dear [REDACTED]

Thank you for sending Alex Norris a copy of the attached letter to Gordon Brown.

Alex would be keen to arrange a meeting with John Pullinger, if this would be possible?

Kind regards

**Senior Parliament Assistant to Alex Norris MP**

Member of Parliament for Nottingham North

Shadow Minister for Levelling Up, Housing, Communities and Local Government

Office: 0115 975 2377

DL: 0115 648 3308

<http://alexnorrismp.co.uk/privacy-notice>

---

**From:** Chair <[Chair@electoralcommission.org.uk](mailto:Chair@electoralcommission.org.uk)>

**Sent:** 04 October 2022 17:49

**To:** [info@gordonandsarahbrown.com](mailto:info@gordonandsarahbrown.com)

**Cc:** NORRIS, Alex <[alex.norris.mp@parliament.uk](mailto:alex.norris.mp@parliament.uk)>

**Subject:** Constitutional Review and Electoral Commission powers

Dear Mr Brown

Please find attached a letter from John Pullinger, Chair of the Electoral Commission.

Best wishes

[REDACTED]  
[REDACTED]  
Business Manager to the Chair and Chief Executive

**The Electoral Commission**

[REDACTED]  
[electoralcommission.org.uk](http://electoralcommission.org.uk)

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Rt Hon Gordon Brown  
By email

04 October 2022

Dear Gordon

### **Constitutional Review and Electoral Commission powers**

I am writing following reports of your constitutional review for the Labour Party, which makes reference to giving additional powers to the Electoral Commission.

I welcome the focus on this area of policy. We have for some time been calling for a strengthening of the regulatory framework for political finance in the UK. As the regulator of the UK's political finance laws, our primary focus is on supporting wide participation in campaigning through accessible guidance and advice on compliance. However, the Commission also needs the right tools to take action to achieve compliance and support public confidence in election and referendum campaigners. We have an important statutory role to keep the workings of our electoral system under review, and to make policy recommendations designed to improve the electoral system in the UK. Given the apparent scope of your review, I thought it would be useful to highlight some of our existing recommendations.

A key change to the system we have recommended is to ensure that monetary penalties can be proportionate to the most significant contraventions of political finance laws. Although many campaigns involve small groups of volunteers, some campaigners can spend millions of pounds at UK elections and referendums. The Commission's financial sanctions are currently limited at £20,000 per offence. This does not provide an effective deterrent to stop some campaigners committing offences, or a sanction proportionate to the impact those offences can have. Our recommendation that the UK's governments should significantly increase this limit has already been taken up by the Scottish Parliament – in the Referendums (Scotland) Act 2020, raising it to £500,000 – and we would welcome similar reform through the UK Parliament.

To help us deal quickly and effectively with allegations that political finance laws have been broken, the Commission needs to be able to access information from a wider range of organisations. This includes social media companies who supply services to campaigners. We are already able to obtain evidence once a formal investigation has been launched, but would benefit significantly from strengthened legal powers to obtain information ahead of that stage. This would enable us to act more quickly when we assess concerns that we identify, or when allegations are made to us, supporting 'real-time' regulation as well as investigations after an election or referendum has taken place.

We have also identified the need for stronger controls on donations to address the risk of foreign interference in UK political campaigns. Political parties and campaigners are



required to check that a donation is from a permissible source, but we have recommended that they should take additional steps to ensure they know where the money has come from. Enhanced due diligence and risk assessment requirements for parties could be introduced in a way that recognises the need for proportionality, with different requirements depending on the size of a regulated entity's financial infrastructure, or the size of a donation. This would help to ensure campaigners identify foreign money before donations are accepted. Similarly, existing controls on donations by companies should be strengthened to require that they have made enough money in the UK to fund the amount of their donation or loan. This would make sure the money did not originally come from outside the country.

In the longer term, we continue to highlight the benefits of greater alignment between the regulatory frameworks for candidates, political parties and third-party campaigners, to clarify accountability for political finance regulation and strengthen voters' trust in the regulatory system. As the Committee on Standards in Public Life has recently recommended, this could involve decriminalising some offences that relate to candidate spending laws, and expanding the Commission's regulatory powers to include the enforcement of civil sanctions for candidates.

More widely, the Commission has continued to highlight for many years that the UK's extensive and complex body of electoral law needs to be modernised and simplified. This is needed to help electoral administrators provide quality services to voters; parties and campaigners to be able to easily understand the requirements placed on them; and to enable governments and legislatures to deliver their policy priorities.

The UK's law commissions published the final report of their detailed and thorough review of electoral law in March 2020, and the Committee on Standards in Public Life and the Public and Constitutional Affairs Committee of the UK Parliament have also supported the case for consolidation and simplification of electoral law. What is now needed is a commitment from each of the UK's governments to implementing this comprehensive and well-supported package of recommendations.

I hope this is a helpful overview of our main recommendations in this area. Should you have questions or wish to arrange a meeting, your office can do so with our Public Affairs Manager, [REDACTED], at [REDACTED]

I have also copied this letter to Alex Norris MP, as Shadow Minister covering elections policy.

Yours sincerely,



John Pullinger  
Chair

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Reporting of donations given to a company  
**Date:** 27 March 2023 16:04:04

---

Hi [REDACTED]

Thank you for the update. I will wait to hear from you.

Kind regards,

[REDACTED]

[REDACTED]  
Regulatory Support Manager

**The Electoral Commission**  
[electoralcommission.org.uk](https://electoralcommission.org.uk)

---

**From:** [REDACTED]  
**Sent:** 24 March 2023 8:46 PM  
**To:** [REDACTED]  
**Subject:** Reporting of donations given to a company

Dear [REDACTED]

Apologies for the delay in getting back to you, I am finalising details and hope to respond to you early next week.

Best,

[REDACTED]

[REDACTED]  
Office Manager to the Rt. Hon. Boris Johnson MP (Uxbridge and South Ruislip)

-----  
Telephone [REDACTED]  
House of Commons, London, SW1A 0AA



please consider the environment - do you really need to print this email?

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**From:** JOHNSON, Boris <[boris.johnson.mp@parliament.uk](mailto:boris.johnson.mp@parliament.uk)>  
**Sent:** 20 March 2023 16:10  
**To:** [REDACTED]  
**Subject:** RE: Reporting of donations given to a company

Dear [REDACTED],

Thank you for your email to Mr Johnson.

We will revert as soon as possible this week, once we have checked the details and thank the Electoral Commission for working with us on this.

Best,

[REDACTED]

[REDACTED]  
Office Manager to the Rt. Hon. Boris Johnson MP (Uxbridge and South Ruislip)  
-----  
House of Commons, London, SW1A 0AA



please consider the environment - do you really need to print this email?

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**From:** [REDACTED]  
**Sent:** 20 March 2023 15:19  
**To:** JOHNSON, Boris <[boris.johnson.mp@parliament.uk](mailto:boris.johnson.mp@parliament.uk)>  
**Subject:** Reporting of donations given to a company

Dear Mr Johnson,

As you're aware, the Electoral Commission regulates donations given to registered political parties, Member of Parliament and Members Associations. We then as part of our role in providing transparency of political finance in the UK publish any donations that fall within the regulated donee laws.

We are aware that you recently reported a donation to the Register of Members Financial interest, which has then been forwarded on to us to publish. We note that donation appears to have been given to a company and not to yourself.

Whilst the company bears your name, and you are a shareholder, if the money was given to the company, it could be more appropriate that the company reports it in its capacity as a Members Association.

As way of background and further information a Members Association is classified an organisation where most, or all, of its members are members of a political party.

Before we publish the donation we would appreciate clarity on:

- the basis that you are reporting it - was it given to the company direct but the intention is for you to be the recipient
- Whether the Office of Boris Johnson Ltd meets the definition of a Members Association
- If the donation was given for political activities, either your own activities or the political activities of the Members Association

Depending on your answer to the above, we will consider whether we need to

write to the company itself to discuss whether they should report it, rather than publish the information you have sent to us. We would of course be happy to discuss this further should that be of assistance.

Kind regards,

[REDACTED]

[REDACTED]

Regulatory Support Manager

**The Electoral Commission**

[electoralcommission.org.uk](https://electoralcommission.org.uk)

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**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Urgent: Declaration Elec Commission 122022.pdf  
**Date:** 21 December 2022 16:04:30

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Dear [REDACTED]

I failed to thank you for getting back to me regarding this on Monday.

Have a lovely Christmas.

Kind regards

[REDACTED]  
[REDACTED]  
[REDACTED]

Islington North

[corbynj@parliament.uk](mailto:corbynj@parliament.uk)

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 19 December 2022 11:12  
**To:** [REDACTED]  
**Subject:** RE: Urgent: Declaration Elec Commission 122022.pdf

Hi [REDACTED],

The rules around checking permissible donations are set out in the Political parties, Elections and Referendums Act 2000.

The permissibility rules apply where a donation is over £500 and the donation is for political activities. I am not aware of there being other rules around permissibility. It is for the person receiving the donation to check that it is permissible.

It is difficult to give an answer based on hypothetical, in this instance donations towards this fund do not need to be reported. You would need to make a decision around each donation you receive as to whether it needs a permissibility check. Although it is unlikely that activity around legal bills is covered by the categories of political activity, we have seen instances where legal advice received free of charge might be considered to be covered.

Jeremy will need to continue to report to the RMFI as per their rules.

If there is a particular donation that you receive and you wish to query whether it is covered, please don't hesitate to get in touch (you can come to me directly) and ask. For ease of reference we also have specific guidance which can be found [here](#). (Note this also covers the rules for overseas visits, which are treated slightly differently).

Kind regards,

[REDACTED]

[REDACTED]

Regulatory Support Manager

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**From:** [REDACTED]  
**Sent:** 16 December 2022 10:51 AM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** CORBYN, Jeremy <[jeremy.corbyn.mp@parliament.uk](mailto:jeremy.corbyn.mp@parliament.uk)>  
**Subject:** RE: Urgent: Declaration Elec Commission 122022.pdf

Dear [REDACTED]

Thank you for clearing this up.

Can Jeremy therefore assume that this donation or any similar donation received toward the same end (ie the legal bill) would not be subject to the "permissible donor" list rules (there is no other is there)?

As for the Members Register, he would of course continue to register donations with the Registrar I'd imagine?

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

Islington North

[corbynj@parliament.uk](mailto:corbynj@parliament.uk)

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 16 December 2022 08:22  
**To:** CORBYN, Jeremy <[jeremy.corbyn.mp@parliament.uk](mailto:jeremy.corbyn.mp@parliament.uk)>  
**Subject:** RE: Urgent: Declaration Elec Commission 122022.pdf

Dear Jeremy,

I have conferred with colleagues who agree that this donation did not need to be reported. This is because, based on the information you have provided it does not fall within the definition of political activities as required by the law. We will not be

publishing it. In the event that you need advice in the future please don't hesitate to get in touch.

Kind regards,

[REDACTED]

[REDACTED]

Regulatory Support Manager

**The Electoral Commission**  
[electoralcommission.org.uk](https://electoralcommission.org.uk)

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**From:** CORBYN, Jeremy <[jeremy.corbyn.mp@parliament.uk](mailto:jeremy.corbyn.mp@parliament.uk)>

**Sent:** 14 December 2022 6:02 PM

**To:** [REDACTED]

**Subject:** RE: Urgent: Declaration Elec Commission 122022.pdf

Dear [REDACTED]

Many thanks for this email and indeed for your telephone call.

This donation will not be used for political activities at all; additionally it does not meet any of the criteria or activities you mention below.

The donation was to help pay a legal bill that I was left with in a libel action that was taken out against me. The case was recently discontinued after 3 and a half years of defence costs and this contribution would simply bring the costs down. The donation was offered in response to an appeal that was made public by a supportive individual who knew of the case.

I look forward to hearing from you.

Kind regards,

Jeremy Corbyn MP  
[corbynj@parliament.uk](mailto:corbynj@parliament.uk)  
Tel 0207 219 3545

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**From:** [REDACTED]

**Sent:** 14 December 2022 15:43

**To:** CORBYN, Jeremy <[jeremy.corbyn.mp@parliament.uk](mailto:jeremy.corbyn.mp@parliament.uk)>

**Subject:** RE: Urgent: Declaration Elec Commission 122022.pdf

Dear Jeremy [REDACTED]

I acknowledge receipt of your return of an impermissible donation, however before we publish it we need to establish whether it was for political activities.

Political activities for MPs include:

- carrying out research on a particular policy that you are promoting in the UK Parliament
- holding an event in your constituency to bring together different groups and individuals to discuss a particular issue or policy
- visiting another country to understand how a particular policy works there
- the running of your office.
- 

Please provide details of the circumstances of the donation and confirm that it is or is not for political activities.

Kind regards,

[REDACTED]

[REDACTED]

Regulatory Support Manager

**The Electoral Commission**

[electoralcommission.org.uk](http://electoralcommission.org.uk)

-----Original Message-----

From: CORBYN, Jeremy <[jeremy.corbyn.mp@parliament.uk](mailto:jeremy.corbyn.mp@parliament.uk)>

Sent: 13 December 2022 5:41 PM

To: PEF Inbox <[PEFInbox@electoralcommissionorguk.onmicrosoft.com](mailto:PEFInbox@electoralcommissionorguk.onmicrosoft.com)>

Subject: Urgent: Declaration Elec Commission 122022.pdf

Dear Electoral Commission,

Please find attached the completed form for declaring an impermissible donation thank you.

If the donor can remain anonymous that would be preferable from his point of view but if that is not an option then so be it.

Kind regards,

Jeremy Corbyn MP

[corbynj@parliament.uk](mailto:corbynj@parliament.uk)

Tel 0207 219 3545

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**From:** [REDACTED]  
**To:** [cat.smith.mp@parliament.uk](mailto:cat.smith.mp@parliament.uk)  
**Cc:** [REDACTED]; [REDACTED]  
**Subject:** Updated OPQs pack  
**Date:** 25 January 2023 11:24:00  
**Attachments:** [OPQ- 903293 - Thompson - 2023-01-26.docx](#)

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Dear Cat,

Thank you for your time this morning. Please find attached an updated OPQs pack for tomorrow.

As discussed, we have added in the question at the end on the National Security Bill.

Best wishes,

[REDACTED]

[REDACTED]

Senior Communications Officer (Public Affairs)

**The Electoral Commission**

[REDACTED]

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