

[REDACTED]

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**From:** FOI  
**Sent:** 10 January 2018 12:32  
**To:** [REDACTED]  
**Cc:** FOI  
**Subject:** FOI 192/17 Naming donors to Political Parties - Response  
**Attachments:** FOI 192.zip

Dear [REDACTED]

**Our Ref: FOI 192/17**

Thank you for your email to the Electoral Commission dated **05 December 2017**.

The Commission aims to respond to requests for information promptly and regrets that on this occasion we have not done so.

Your request is in bold below followed by our response.

**Under Freedom of Information legislation please provide me with a copy of all documents held by the Electoral Commission during the months of September, October and November 2017 including letters, internal correspondence, reports, research, reviews, briefing documents, minutes of meetings, emails and memos that make reference to plans to implement legislation in Westminster lifting the ban on naming donors to political parties in Northern Ireland.**

**If this time period is too long to comply with cost and time exemptions, please provide me with the same information for the longest time period possible. For example, if three months is too long please provide me with the documents for October and November 2017. If this still breaches time and cost exemptions please provide me with the documents for the period of November 2017. If this is still too long please provide me with the longest time period possible starting backwards from Friday 24th November.**

Our response is as follows:

We hold some of the information you have requested.

The Commission also holds information which is relevant to your request but which we consider to be exempt from disclosure under the FOI Act. This information falls into the following categories:

- Information which involves or relates to discussions between staff of the Electoral Commission and UK Government officials about the issue of donations to political parties in Northern Ireland. Disclosing this information would inhibit the free and frank provision of advice between the Electoral Commission and the UK's various governments in future, and which is therefore exempt from disclosure under s36(2)(b)(i) of the FOI Act.
- Information which involves or relates to communications between lawyers and other staff at the Electoral Commission which is subject to legal professional privilege, and which is therefore exempt from disclosure under s42 of the FOI Act.

- Information relating to donations to which the current statutory prohibition on publication applies (under s71E of the Political Parties, Elections and Referendums Act 2000), and which is therefore exempt from disclosure under s44(1)(a) of the FOI Act.

I trust that this information satisfies your request. The Commission strives to be an open, transparent authority, but in some circumstances we cannot responsibly release requested information, and we ask for your understanding in this regard.

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:

<http://www.electoralcommission.org.uk/about-us/freedom-of-information-requests/how-do-i-make-an-foi-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 Management Adviser**

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## **Northern Ireland donations and loans – Q&A**

**The Secretary of State announced in July that there would be future transparency. So why are the public not able to see this data?**

Legislation needs to be passed at Westminster in order for the data to be published. The Government has not yet laid this legislation. We have received the data from the political parties, but have to keep it confidential until this legislation is passed.

**Why has the legislation not been laid?**

We don't know the reason for the delay. That's a question for the Government to answer. We are urging the Secretary of State to bring forward this legislation as soon as possible. From our perspective, the legislation is ready to be laid. We have been consulted on it and our view is that it is ready to be laid.

**Do you know why the legislation has been delayed? Is it because of X?**

That's a question for the Government to answer. We don't know the reason for the delay. We won't speculate on it.

**When will the data be published? Will the public ever get to see this data?**

We have received the data and are ready to publish it as soon as the legislation is passed. So it will be published as soon as the legislation goes through Parliament. We urge the Government to bring forward the legislation as soon as possible.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** Ann Watt  
**Sent:** 21 November 2017 12:07  
**To:** [REDACTED]  
**Subject:** 20171121 D&L questions  
**Attachments:** 20171121 D&L questions.docx

Hi [REDACTED] – I've done a quick list of Q&A ahead of possible media queries or interviews on Thursday.

Let me know any additions/changes.

Ann

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 19 October 2017 09:20  
**To:** Ann Watt; Bob Posner; Louise Edwards  
**Cc:** [REDACTED]  
**Subject:** FW: Publication of donations

Bob, Ann, Louise

You'll recall a little while back we discussed whether the way parties over report aggregated donations has any impact on the register of donations and what we publish.

This point came about after we produced guidance for the NI transparency Order and discovered that historically parties over report donations in a way that isn't in accordance with PPERA (I forwarded that legal advice earlier in the week).

At the time we felt relatively relaxed about this issue as long as it didn't have any unintended consequences for the register of donations.

I asked for legal advice and that's below.

In short I think we're okay to continue publishing donations the way we are but there are risks associated with that approach namely:

- donors donating amounts under the relevant reportability thresholds to privacy;
- and the expectation donors have as to the circumstances under which their details will be made public;
- consistency with the Commission's enforcement policy in relation to over reporting in spending returns (e.g. as in the Conservative Party case), which may need to be the subject of further legal advice.

My view is that we can continue our current approach so long as we're comfortable with the associated risks, but we should think about handling and how we communicate this to the parties (i.e you can report one way under PPERA but we understand that's burdensome so we're happy for you to continue to report the way you are). I'm on holiday from tomorrow, so will leave this with you to consider.

[REDACTED]

[REDACTED]

**Party Finance Guidance Manager**  
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**From:** Louise Footner  
**Sent:** 05 October 2017 14:43  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Publication of donations

Thanks [REDACTED]

[REDACTED] will be looking at this and will be in touch as you suggest.

Louise

---

**From:** [REDACTED]  
**Sent:** 05 October 2017 12:37  
**To:** [REDACTED] Louise Footner  
**Subject:** Publication of donations

Hi Louise, [REDACTED]

I need some relatively urgent legal advice please. If I could have a response by COP 13 October that would be handy.

The issue is quite difficult to explain in an email so a chat might be easier. I've summarised briefly the issue below.

1. Political parties report aggregated donations. These being donations that aggregate over £7,500 from the same source in a calendar year. At that point the threshold reduces to £1,500 if the same source continues to donate. This is best explained in the example:

The Party is given a regular contribution of £1,000 per month for the whole of 2017.

The £7,500 reporting threshold is exceeded in August. The Party must report all donations accepted up to August in their Q3 return. The Commission publishes all eight £1,000 donations – including the donations from before 1 July 2017. This is because those donations aggregate to over £7,500 with the other donations accepted in Q3.

Because a donation from the donor has been reported in Q3, the reporting threshold for further donations from the same donor falls to £1,500. This is exceeded in October and again in December. The Party reports the next two donations of £1,000 as accruing in October and a further two donations of £1,000 which become recordable in December, both in their Q4 return. The Commission publishes that quarter as usual.

2. It has become apparent that the Commission has advised parties to report donations from the same source differently. That is that once the £7,500 threshold is exceeded parties then report each £500 donation from that same source rather than when the donations exceed £1,500.
3. The issue I'd like clarification on is whether this over reporting has any implications for the register of donations? In other words does PPERA allow us to publish these individual donations of £500 before it reaches £1,500. Or is there a specific requirement which stipulates the Commission can only publish donations that have reached the relevant reporting threshold (i.e £1,500)?

Apologies if this isn't very clear – as I said a conversation may be needed.



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**From:** Ann Watt  
**Sent:** 19 October 2017 10:49  
**To:** Executive Team; John Holmes; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** Media articles on transparency in Northern Ireland

Dear all – you may have seen the media coverage today of my recent interview with The Detail website, which was picked up by the [Belfast Telegraph](#) and others. The Detail's report is [here](#).

The interview was recorded at the start of September for one of The Detail's investigations into election finance reporting in Northern Ireland, but was only published on their website yesterday. It was then picked up by other media.

Three points come out in the media coverage of the interview:

- Consideration of lowering the threshold for reporting donations, since £7,500 is very high given the size of the parties in Northern Ireland. This was the last question in The Detail's interview, but became the main point of the article. It is however an appropriate point for the Commission to raise now that transparency is about to be achieved. We should consider repeating this point when we publish the first set of donations data for Northern Ireland (due to be before the end of 2017). Obviously we would need to consider the wider implications since £7,500 is a UK-wide threshold at present;
- Repeating the Commission's earlier recommendation that we should have powers to investigate compliance issues in candidate spending returns. We first made this recommendation in 2013, and repeated it in the 2015 UKPG [Campaign spending report](#) (see recommendation 1).
- Calls for transparency in Northern Ireland to be back-dated to January 2014, a point we continue to make (and which we should repeat when we publish the first set of data).

[REDACTED]

I'm in Bunhill today if anyone want to discuss.

Ann

**Ann Watt**  
**Head of Electoral Commission, Northern Ireland**  
Ground Floor, 4 Cromac Place  
The Gasworks  
Belfast BT7 2JB  
Tel: 028 9089 [REDACTED]  
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**From:** Ann Watt  
**Sent:** 15 November 2017 08:15  
**To:** [REDACTED]  
**Subject:** Morning

Hi [REDACTED]

A few questions for you.

Do you think we should suggest Sir John writes to the SoS for NI about donations and loans? It seem appropriate to me, esp since we are putting out a strongly-worded press notice. If we are taking this tough public line, it would be appropriate to parallel it with a letter to the SoS. I am meeting with Bob this morning so I will get his view too.

[REDACTED]

[REDACTED]

I'm in meetings from 9:30 until 3 but give me a call before that if you get this in time.

Ann

**Ann Watt**  
**Head of Electoral Commission, Northern Ireland**  
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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 08 November 2017 15:21  
**To:** Louise Edwards  
**Subject:** Q3 2017 doantion return follow up letter

Hi Louise,

I'm not sure what draft of the letter you were sent previously. The **Q3 2017 follow up letter** has moved on a bit following discussions with legal and having seen the level of information provided by the parties in their returns . Page one of the letter should essentially be the same to most parties and then we will personalise page 2 and the return form to be completed by the party depending on what information we need them to provide or clarify.

This is the link to the letter

<http://skynet/dm/Functions/PEFpol/HMG/Confidential%20NI%20donations/Compliance/1%20Nov%202017%20DRAFT%20Donations%20letter.docx> and this is the draft form

<http://skynet/dm/Functions/PEFpol/HMG/Confidential%20NI%20donations/Compliance/Form%20for%20Confirmation%20of%20details%20provided%20in%20donation%20report%20for%20Q3%202017.docx>

[REDACTED]

---

**From:** Louise Edwards  
**Sent:** 03 November 2017 10:40  
**To:** [REDACTED]  
**Subject:** RE: NI issues

Thanks [REDACTED] – I've looked at the letter and it is clear and sensible to me. Is this the same letter as the one that [REDACTED] has mentioned to me? Just want to avoid inadvertent duplication.

Thanks

Louise

---

**From:** [REDACTED]  
**Sent:** 31 October 2017 12:50  
**To:** Louise Edwards  
**Subject:** RE: NI issues

Hi Louise ,

Just to keep you up to date – so you are reading the most recent version of the letter to parties about Q3 2017 received and accepted dates of donations.

■■■■ has reviewed the letter and made some amendments – one I'm speaking to her about this afternoon. I've attached my recent email to ■■■■ with a link to the most recent version of the draft letter.

Regards

■■■■

---

**From:** Louise Edwards  
**Sent:** 30 October 2017 10:00  
**To:** Ann Watt  
**Cc:** ■■■■  
**Subject:** RE: NI issues

Hi both

I'm sorry for not replying earlier. I've been caught up in another matter for the last week, but I should have time today or tomorrow to turn to this. My apologies again.

Louise

---

**From:** Ann Watt  
**Sent:** 26 October 2017 11:55  
**To:** Louise Edwards  
**Cc:** ■■■■  
**Subject:** NI issues

Hi Louise

There are a couple of issues where we need your sign-off:

- Draft letter to NI parties following submission of their Q3 donation and loan returns, asking for confirmation of dates received and accepted. I've attached ■■■■ email which has a link to the draft letter. We expect we will have to send this letter to many of the NI parties once we receive their returns. Obviously it's important that we get these letters out as soon as possible so that we get the information we need to allow us to publish the data.
- Draft letters to various NI parties following up queries from Statement of Accounts – ■■■■ has done an analysis of all SOAs and identified a number of important issues where we think we need clarification. She has sent you draft letters to your n: drive email address (because of the connection in many cases to D&L information)

I'm out of the office from lunchtime tomorrow until Tues 7 Nov, but ■■■■ is around.

Many thanks

Ann

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**Follow Up Flag:**  
**Flag Status:**

Bob.

**From:** Louise Edwards

Hi

Thanks  
LOuise

**From:** Bob Posner

**Sent:** 19 October 2017 13:57

**To:** [REDACTED]; Ann Watt; Louise Edwards

Cc:

**Subject:** RE: Publication of donations

# Thanks

[REDACTED]

Louise, Ann – other thoughts?  
Bob.

---

**From:** [REDACTED]  
**Sent:** 19 October 2017 09:20  
**To:** Ann Watt; Bob Posner; Louise Edwards  
**Cc:** [REDACTED]  
**Subject:** FW: Publication of donations  
Bob, Ann, Louise

You'll recall a little while back we discussed whether the way parties over report aggregated donations has any impact on the register of donations and what we publish. This point came about after we produced guidance for the NI transparency Order and discovered that historically parties over report donations in a way that isn't in accordance with PPERA (I forwarded that legal advice earlier in the week).

At the time we felt relatively relaxed about this issue as long as it didn't have any unintended consequences for the register of donations.

I asked for legal advice and that's below.

In short I think we're okay to continue publishing donations the way we are but there are risks associated with that approach namely:

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[REDACTED]

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**From:** Louise Footner  
**Sent:** 05 October 2017 14:43  
**To:** [REDACTED]

**Subject:** RE: Publication of donations

# Thanks

will be looking at this and will be in touch as you suggest.

Louise

**From:** [REDACTED]  
**Sent:** 05 October 2017 12:37  
**To:** [REDACTED]; Louise Footner  
**Subject:** Publication of donations

Hi Louise,

I need some relatively urgent legal advice please. If I could have a response by COP 13 October that would be handy.

The issue is quite difficult to explain in an email so a chat might be easier. I've summarised briefly the issue below.

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Apologies if this isn't very clear – as I said a conversation may be needed.



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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 14 November 2017 16:10  
**To:** [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

No problem [REDACTED]. If you need anything else let me know

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 14 November 2017 16:06  
**To:** [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks so much for your help getting this sorted.

I will use this to add in a line into the GB release and for the quote too. I'll ensure you (and Ann where appropriate) are copied in to see the release and LTT.

Thanks again,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 14 November 2017 14:26  
**To:** [REDACTED]; Claire Bassett; Ben Wilkinson; Bob Posner; Craig Westwood; Ann Watt  
**Cc:** Ailsa Irvine; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks all for your comments. I have cleaned up the press release and made the agreed amends:  
<http://skynet/dm/Functions/media/Press%20releases/Media%20statement%20-%20NI%20donations%20and%20loans%20Q3.docx>

This will be issued at the same as the Q3 press release in GB on the 23<sup>rd</sup>. I'll keep you updated thereafter

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 14 November 2017 10:12  
**To:** Claire Bassett; [REDACTED] Ben Wilkinson; Bob Posner; Craig Westwood; Ann Watt  
**Cc:** Ailsa Irvine; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update  
**Importance:** High

[REDACTED]

[REDACTED]

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**From:** Claire Bassett  
**Sent:** 14 November 2017 08:47  
**To:** [REDACTED] Ben Wilkinson; Bob Posner; Craig Westwood; Ann Watt  
**Cc:** Ailsa Irvine; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks

Couple tweaks and thoughts from me- main one is about whether we know for a fact that the legislation is ready to lay and whether it would be better to preface with "We understand..." or, slightly stronger, "We have seen legislation ready..."?

Thanks

Claire

---

**From:** [REDACTED]  
**Sent:** 13 November 2017 15:45  
**To:** Claire Bassett; Ben Wilkinson; Bob Posner; Craig Westwood; Ann Watt  
**Cc:** Ailsa Irvine; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

All

Proposed statement on delay of donations legislation in NI:  
<http://skynet/dm/Functions/media/Press%20releases/Media%20statement%20-%20NI%20donations%20and%20loans%20Q3.docx>

Grateful for thoughts on this approach and the content.

Thanks

[REDACTED]

---

**From:** Claire Bassett  
**Sent:** 10 November 2017 14:50  
**To:** [REDACTED] Ben Wilkinson; Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks all

I agree this has the potential to be a significant story in NI and possibly London as well. I think a fairly strong statement will be needed expressing our disappointment at this not happening given the apparent agreement and readiness of legislation etc. (Although very happy to discuss with NI as Ann [REDACTED] will have a better sense of what needed) I think timing wise we should wait until we would normally be putting a release out about publication for 23<sup>rd</sup> but might want to think about a

wider handling plan. For example are we going to do reactive media? This is probably something to discuss and take sounds from [REDACTED] on too

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**From:** [REDACTED]  
**Sent:** 10 November 2017 14:37  
**To:** Ben Wilkinson; Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Probably worth adding that any such statement will likely get significant coverage here as we will, by default, be the ones announcing the legislation has been delayed.

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**From:** [REDACTED]  
**Sent:** 10 November 2017 14:35  
**To:** Ben Wilkinson; Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

I think we will need something separate for Northern Ireland (a statement rather than a press release as such) –we don't normally issue the quarterly press releases here so would seem odd to send GB figures on this occasion. Obviously whatever we say in both will be consistent.

[REDACTED]

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**From:** Ben Wilkinson  
**Sent:** 10 November 2017 14:22  
**To:** Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

I assume the best way to approach this would be for us to include our criticism of the delay in the quote that goes out as part of our Q3 press release, rather than do something separate?

If anyone would favour a different approach, let us know.

[REDACTED] – for info

...  
**Ben Wilkinson**  
**Head of External Communications**  
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**From:** Craig Westwood  
**Sent:** 10 November 2017 13:36  
**To:** Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks for the update, Ann – disappointing, as you say, and I agree that we should adopt your approach publicly on the 23<sup>rd</sup>.

Do we also need to put a marker down publicly by saying that we expect the transparency commencement date to stay the same, despite the legislative delays? I assume that despite assurances, until we see the final SI there remains a risk that this could shift (and I guess may indeed be the cause of the delay).

Craig

---

**From:** Ann Watt  
**Sent:** 10 November 2017 13:31  
**To:** Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson  
**Subject:** Transparency in Northern Ireland - update

We met this morning with [REDACTED] from NIO. Not good news I'm afraid. The secondary legislation to enable publication of the NI donation and loan data is ready to be laid, but has been delayed. [REDACTED] did not tell us the reason for the delay. NIO's official line is that "the legislation is still going through internal government clearances".

[REDACTED] said that this delay could last for some time. On the positive side, he also said that progress could be made quickly at any point. So we should continue to press ahead with our preparations for publication of the first set of data.

We are due to publish the GB Q3 donation and loans data on 23 November, which is when we were expecting to publish the first set of NI data. Unless others disagree, on 23 Nov I think we should put out a strongly worded statement expressing our disappointment that the necessary legislation has not be laid. Given that the NIO has had to consult the Commission on the draft legislation, we might even say that we know that the legislation has been drafted and from our perspective is ready to be laid in Parliament.

Ann

**Ann Watt**  
**Head of Electoral Commission, Northern Ireland**  
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The following extract is from Chief Executive's update December 2017:

All other content within this update is not relevant to that requested.

## Update from Northern Ireland

- 0.1 The Transparency Order 2018 was laid before Parliament by the Secretary of State for Northern Ireland on 23 November 2017. This is an important milestone towards transparency of NI donations and loans, which the Commission has been calling for since 2005.
- 0.2 On the Order being laid, we wrote to all NI party treasurers and NI MPs/MLAs explaining the prospective changes to the rules and where they can find more information (this is part of a series of letters sent to parties/MPs to help them understand the rules), and published a factsheet with working examples. Further Commission guidance will be published as soon as the law come into force.
- 0.3 When the Order is in force, the Commission will be able to publish information about NI donations and loans dating back to 1 July 2017. It is an affirmative Order and has to be debated by both Houses of the UK Parliament before it can be 'made' by the Secretary of State and come into force. (The debates can approve or reject the Order, but cannot amend it.) We hope to be able to publish in the early new year, but the timing of our first publication will depend on the parliamentary passage of the Order.
- 0.4 On the morning of 23 November, the Commission published [a statement](#) expressing disappointment that legislation had not been passed to allow publication of Quarter 3 NI donations alongside the GB donation reports which were published that day, contrary to earlier indications from NIO. A link to our statement urging the Government to lay the Order is [here](#). The statement was covered in NI media and Ann Watt gave some interviews in the morning and additional interviews after the legislation was laid in the afternoon.
- 0.5 As widely reported in the media, talks between the Northern Ireland parties have not reached agreement. In the absence of an Executive being formed, on 13 November the Secretary of State introduced a bill in Parliament to impose a budget for Northern Ireland government departments. Another NI Assembly election remains a possibility, but has not been mentioned publicly by the Secretary of State as an option in recent months.
- 0.6 The Chief Electoral Officer plans to launch online registration in Northern Ireland in early February 2018. We are also beginning work with the Chief Electoral Officer to introduce performance standards in Northern Ireland, and about making further improvements to the planning for Single Transferable Vote counts.

**Further information:** Ann Watt, Head of Electoral Commission, Northern Ireland; Tel: 028 9089 4029; Email: [awatt@electoralcommission.org.uk](mailto:awatt@electoralcommission.org.uk)

The following has been extracted from the Q3 2017 Donations and Loans reactive media lines to take:

All other content within this document is not relevant to the requested information

## **Top Line**

**As part of its routine publication and commitment to ensuring transparency in party finance, the Electoral Commission has today published details of donations and loans to political parties for quarter three, 2017.**

## **Q & A – specific to Quarter 3 2017**

**Northern Ireland donation reporting ( [REDACTED] leading on this)**

Full NI media statement:

<http://skynet/dm/Functions/media/Press%20releases/Media%20statement%20-%20NI%20donations%20and%20loans%20Q3.docx>

Letter to NI Minster available [here](#).

### **1. Why are NI parties not included in today's data?**

Today we've expressed our disappointment that we remain unable to publish the details of political donations and loans in Northern Ireland, because the UK Government has not yet made the necessary legislation.

In July the Secretary of State for Northern Ireland announced that he would bring forward legislation to enable the publication of donations and loans received by political parties in Northern Ireland from 1 July 2017.

The Electoral Commission had expected to publish the first set of data on donations to Northern Ireland political parties today, alongside the information on donations to political parties in Great Britain. However, it is unable to do so as the necessary legislation has not been made. Because of this the Commission continues to be prohibited from publishing any information relating to donations and loans received by political parties in Northern Ireland.

We urge the UK Government without delay to bring forward this legislation for parliament to approve to allow us to publish this information as soon as possible.

## Media Statement

XX September 2017

### Electoral Commission statement on publication of legislation that will enable transparency in Northern Ireland

**Today the Secretary of State for Northern Ireland laid legislation to enable the publication of information about donations and loans to political parties. Ann Watt, Head of the Electoral Commission in Northern Ireland said:**

“Transparency about political donations is essential to confidence in the democratic process. We welcome the publication of this legislation which, once passed, will mean that information about political donations and loans in Northern Ireland will be published for the first time. We look forward to the first publication of this data which we expect to be before the end of this year.

“While we welcome this progress, we would urge the Government to bring forward additional legislation to enable the publication of donation and loan information from January 2014, as anticipated by the primary legislation passed at that time. We believe that it is in the public interest for this information also to be made available.”

**Comment [BW1]:** Do we need this clause? A bit technical for a media statement, and might be better explained in the notes to editors.

**Ends**

For further information please contact [REDACTED] on 028 9089 [REDACTED] or [press@electoralcommission.org.uk](mailto:press@electoralcommission.org.uk) Out of office hours - 07789 920 414.

**Notes to editors**

1. 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 by:
  - enabling the delivery of free and fair elections and referendums, focussing on the needs of electors and addressing the changing environment to ensure every vote remains secure and accessible
  - regulating political finance – taking proactive steps to increase transparency, ensure compliance and pursue breaches
  - using our expertise to make and advocate for changes to our democracy, aiming to improve fairness, transparency and efficiency

## NI transparency Order - Implementation plan and actions – explanatory narrative

The Order was laid on 23 November 2017

**Comment [MC1]:** Document that will include explanatory narrative explaining how we arrived at our positions, key milestones, documents, processes, policy considerations etc

### Action #1 – September 2017 **COMPLETED**

More detailed guidance relating to Northern Ireland reporting would be published, and a letter with specific actions that we want parties to take and/or prepare for before/during the October reporting period would be sent out to the relevant parties.

Jenny queried whether we can use our PPERA Schedule 19B investigatory powers for an SI that has not yet been made. [REDACTED] was to consider whether we are able to use this power. [REDACTED] subsequently asked for this query to also include a scenario where an SI has been made but has not yet come into force. Considering this situation would help us to decide what to say when sending further guidance to the parties. Two potential options were to:

1. Write to the parties referencing the factsheet that we provided and explain that received dates are now very important and should be included in parties' third-quarter reports, with the possibility that we may ask them to re-confirm their stated dates at a later time;
2. Write to the parties explaining that once we are sure of our legal powers or the Order has been made we will use our disclosure power to re-confirm the accuracy of parties' stated dates.

#### **Explanation**

[REDACTED] sent through formal advice on 27/09/17 confirming that we cannot issue a disclosure notice until the Order is made. Louise Edwards decided that we would instead write to the parties to request the relevant dates, and would advise them that we will not publish this information until we are satisfied that all the information we have is correct.

The letters sent to the Northern Ireland parties informing them of the rules included a paragraph about needing the received dates.

### Action #2 – September 2017 **COMPLETED 27/09/17**

Confirmation was required as to whether PEF Online would need to be updated in order to make the received date of a donation a mandatory field to be completed by parties and regulated donees. Jo Crofton-Diggins to confirm if changes would be required and how this would be implemented.

#### **Explanation**

[REDACTED] sent an email outlining options regarding this. [REDACTED] proposed that it would be sensible to check at the outset whether or not PPERA required us to display the registers for Northern Ireland separately from those of Great Britain, and in any specific way. This query and the issue of possible PEF Online changes were given to [REDACTED] for assessment.

Umar confirmed on 27/09/17 that the received date is already a mandatory field on PEF Online for current parties and regulated donees, and will therefore also be mandatory for Northern Ireland parties and regulated donees. No further action required.

**Action #3 – September 2017 (COMPLETED 27/09/17)**

Compliance will need to make a decision about the occasions when we want to use our disclosure notice power and how this will be framed, so that Guidance can work out how to incorporate an explanation of this into letters, guidance, factsheets etc., and a formal disclosure notice template can be prepared to be used as appropriate.

**Explanation**

Following legal advice received on 27/09/17 it was decided that Compliance will not use disclosure notices before the Order is made. Instead they will write to the parties requesting the relevant information and will confirm to them that we will not publish any information until we are satisfied that such information is correct.

**Action #4 – September 2017 (COMPLETED 05/10/17)**

The letter we will send to parties will be updated to include a paragraph requesting the received dates of donations from parties, in the absence of using a disclosure notice. We will confirm in the letter that reported donations will not be published until we have this information.

**Explanation**

Louise updated the letter accordingly on 05/10/17 with relevant wording regarding the use of disclosure notices.

**Action #5 – September 2017 (COMPLETED 03/10/17)**

The letter we will send to parties will be updated to include a link to PEF Online, so that parties can report via PEF if they wish to.

**Explanation**

██████████ updated the letter accordingly on 03/10/17.

Following discussions at the meeting on 16/11/17 we agreed that Northern Ireland parties should not be encouraged to submit returns through PEF Online until such time as we are sure that it is fit for this purpose. ██████████ agreed to change the letters to the parties and regulated donees to state that PEF Online should not be used until we have implemented updates following changes in the law.

**Action #6 – September 2017 (COMPLETED 23/11/17)**

██████████ Communications staff to liaise with Communications at the Northern Ireland Office to begin discussing media statements and timings, as it was presumed that the Commission would want to make a statement when the Order was laid.

### **Explanation**

The Commission's statement was drafted and reviewed in discussion with NIO when we knew that the Order was about to be laid. The Order was laid on 23/11/17 and the Commission published its media statement.

### **Action #7 – September 2017 [COMPLETED]**

All enquiries relevant to Northern Ireland transparency would be logged and provided to Guidance to aid in planning factsheets/guidance/letters.

### **Explanation**

Ann Watt determined that the factsheet we drew up covers all predictable questions so logging enquiries will not be necessary at this stage.

### **Action #8 – September 2017 [COMPLETED]**

It was considered whether it would be worth contacting councillors and independents in Northern Ireland about the rule changes to transparency.

### **Explanation**

Ann confirmed that it is sufficient to contact MPs, MLAs and parties, and it is not necessary to contact councillors and independents.

### **Action #9 – September/October 2017 [COMPLETED 12/10/17]**

The Commission will need a clear decision-maker for publication, and an alternate decision-maker. For example, the decision-maker could be the Head of Regulation in consultation with the Head of the Northern Ireland Office, and the alternate could be the PFR Director. This should be documented in the Executive Scheme of Delegation. It is necessary to check that Bob Posner, legal and others agree, and that the relevant decision-maker be formally informed via email. The scheme of delegation will also need to be updated – [REDACTED] is the relevant person to complete this.

### **Explanation**

The scheme of delegation was updated on 12/10/17 to confirm the decision-makers for publishing information on donations and loans.

### **Action #10 – September/October 2017 [OUTSTANDING]**

Compliance will need a simple flowchart to assist in checking returns. This might cover various scenarios (aggregation of donations, changes to loans etc.) to help the team adapt to a new system where some things are required or permitted (sometimes depending on our judgment) to be published and other things are still required to remain confidential.

### **Explanation**

■■■ and ■■■ have done some work on setting out various examples which could help with the production of the flowchart. ■■■ can talk this through with ■■■ (or someone from his team).

→ Progress as of 16/11/17 – ■■■ to get confirmation from Legal that the flowcharts accurately reflect the law.

**Action #11 – October 2017 (COMPLETED 23/11/17)**

We will send parties and regulated donees a letter confirming when the Order is laid and what they will need to do in October, and what we plan on doing in November or December regarding publication.

**Explanation**

Guidance sent a letter on 23/11/17 to all Northern Ireland party treasurers and Northern Ireland MPs and MLAs confirming that the Order had been laid and providing details of the new rules. The letter also linked to the factsheet that we had produced.

**Action #12 – October 2017 (COMPLETED 19/10/17)**

There is a potential for disconnect between how aggregated donations operate under PPERA, and what the parties report and the Commission chooses to accept/publish. This may result in having to inform parties to change their approach to reporting aggregated donations, in accordance with the law. Our understanding was that aggregated donations for Northern Ireland parties must be checked, but that we are prohibited from publishing aggregated donations from the same source below £1,500 after £7,500 has been exceeded.

**Explanation**

■■■ confirmed on 13/10/17 that the aggregation of donations works as we thought under PPERA and therefore the table in our factsheet is correct. ■■■ provided subsequent advice on 18/10/17 on any implications for the register of donations, which does not raise any significant issues with the way parties currently over-report donations – but there are associated risks involved. ■■■ emailed Bob, Ann and Louise about this and requested their input.

It was agreed on 19/10/17 that there was no need to inform the parties, but that guidance should be checked to ensure that it does not conflict with the aggregation approach.

**Action #13 – October 2017 (COMPLETED)**

We want to be in a position to publish amended guidance and forms as soon as possible after the Order is made. We will also need to update our parties and regulated donees webpages.

Comment [JS2]: Completed?

**Explanation**

Guidance and forms have been amended in contemplation of the Order coming into force.

**Action #14 – October 2017 (COMPLETED 16/11/17)**

A test run of third-quarter data from 2016 would be completed by Compliance to demonstrate what information we would publish under the new rules. This would test our processes and procedures.

#### **Explanation**

Political Finance and Regulation successfully ran test data from the third-quarter of 2016 on 16/11/17 and are satisfied that the required processes are in place for when we move to transparency.

#### **Action #15 – October 2017 (OUTSTANDING)**

████ and Jenny will finish the list of implementation points that they spotted during work on the consultation on the Order and send it to ████████ etc. A discussion/s will be had as necessary to check that all points have been covered in the plans to date, or have been added into the list of further planning to be done.

#### **Explanation**

→ Progress as of 16/11/17 – █████ to provide a summary for the next meeting.

#### **Action #16 – October 2017 or when final draft Order is shared with Commission (OUTSTANDING)**

A diagram timeline illustrating the likely 'made' and 'coming to force' dates of the Articles in the Order should be made, so that everyone is clear when the Article that amends s71E of PPERA (and the equivalent for loans) will be amended to allow the Commission to begin publishing. It is important to note that NO disclosure can be lawfully be made until those Articles are in force and have amended PPERA accordingly.

#### **Explanation**

→ Progress as of 16/11/17 – █████ to speak to █████ at the Northern Ireland Office and report back to the group.

#### **Action #17 – October 2017 (OUTSTANDING)**

It was decided that we should aim to publish data for regulated donees at the same time as we publish data for parties. Compliance would thus need to consider potential cut-off dates for regulated donee information and how this would work in practice.

#### **Explanation**

#### **Action #18 – October 2017 (OUTSTANDING)**

We need to consider how we will display the new data, for example do we need to create a new register? The emails of 29/09/17 from █████ to █████ and █████ refer.

#### **Explanation**

→ Progress as of 16/11/17 – it will be necessary to speak to IT and TRIAD about how much notice they will need to make the changes to the register and get it live.

**Action #19 – October 2017 [OUTSTANDING]**

Update Northern Ireland Quality Management System to reflect the new rules.

**Explanation**

→ Progress as of 16/11/17 – [REDACTED] will update the QMS to reflect the new rules.

**Action #20 – October 2017 [OUTSTANDING]**

An additional thing that staff will need to consider is the need for the Commission to reasonably hold the belief that a donation/loan was received/entered into on or after 01 July 2017 before it decides to publish it. This is something that the Order is adding into PPERA, in relation to lifting the s71E and s71Z4 prohibitions on publishing Northern Ireland donations or loans.

**Explanation**

→ Progress as of 16/11/17 – processes, procedures and QMS to be assessed and updated to capture the fact that Louise needs to understand what data we are publishing so as to try and avoid the Commission publishing information that we shouldn't.

The processes should have points along the publication route where members of staff can check the data before it moves onto the next stage.

Does the scheme of delegation need updating accordingly?

**Action #21 – October/November 2017 [OUTSTANDING]**

Identify any QMS procedures that deal wholly with Northern Ireland donations and loans – amend/add new information to ensure that these reflect the procedures for the 'old' and 'new' regimes. Possible late donation reports may have to be dealt with under the old regime as will any changes to pre-2014 loans?

We need to agree on physical handling procedures for all future post-July 2017 donation and loan reports. After our first publication will these all be scanned in Northern Ireland and London will then upload them onto PEF Online? Will permissibility checks be carried out in London or Northern Ireland? Will these arrangements be incorporated into PEF 59 – or will we need a separate procedure for Northern Ireland returns?

**Explanation**

**Action #22 – November 2017 [OUTSTANDING]**

We need to look at the existing LTT and FAQs in order to anticipate the questions that we are likely to receive about the new regime and formulate our answers. A fact sheet would be a useful guide for what we will/will not publish.

**Explanation**

**Action #23 – November/December 2017 [OUTSTANDING]**

Another press release on the publication of the first set of data to be issued.

**Explanation**

# NI transparency Order - Implementation plan and actions

Table of changes	
30.09.17	Martin Carr, Kate Engles, John Franks, & Jane Draper Discussion to go through the outstanding points and what actions are needed to be undertaken internally before the Order is made.
25.09.17	KE made some updates on 25/09/2017 to reflect the fact that we are still waiting for the Order to be laid. It is now expected to be laid at some point after 9 Oct, rather than by 14 Sept as previously.
28.09.17	Martin Carr, Umar Hanif, Kate Engles, Louise Edwards Discussed internal implementation plan and actions. Updated actions.
05.10.17	Updated after conversations with Bob, Ann and Louise concerning aggregation of donations and its implications for the register. Legal advice requested.
18.10.17	Kate added a line as a reminder that she and Jenny need to go through their list of points to hand over to the implementation/operational colleagues
19.10.17	Martin updated the actions on aggregated donations and register of donations following legal advice.
21.11.17	Martin updated the actions following the implementation meeting on 16 November. Bob requested that all actions be completed by the time of the next meeting on 30.11.17
28.11.17	Martin updated the actions following the implementation meeting on 28 November. Agreed that all actions must be completed by 15 December to ensure we are prepared for publication in 2018
7.12.17	Martin updated the actions to include FOI 192/17

The explanatory narrative to the actions and how they were resolved can be found [here](#).

<b>Order laid</b>	23 November 2017
<b>Order made</b>	
<b>Comes into force</b>	1 day after the Order is made

Month	Step anticipated with the Order	Action - what Commission could do/plans that we need to flesh out and confirm	Owner	Completed by	Completed – yes (details)
September	PEF Online	<p>Confirm whether PEF Online needs updating by making the received date a mandatory field for parties and reg donees.</p> <p>Need to confirm with Jo-Crofton Diggins ASAP if changes are required and how this will be implemented.</p>	John Franks/Umar Hanif	1 September 2017	<p><b>COMPLETED</b></p> <p>Chased on 4.9.1</p> <p>UH emailed opt emailed to prop would be sensib at the outset wh PPERA requires the GB and NI r separately and i specific way. Qu JD in legal. JCD i possible PEFO c</p> <p>Update 27/9 UH that the receive already mandat parties and on F same applies to donees and onc parties and reg donees, it will a mandatory</p>
September	We expect the Order to be 'laid' after 9 Oct , after Parliament returns for party conference <a href="#">recess</a> )	We will publish more detailed guidance and send a letter with specific actions that we want parties to take/prepare for either before/during the October reporting period.	Jane Draper	8-14 September 2017	<p><b>COMPLETED</b></p> <p>28.9 - JD sent fo on 27.9.17 conf</p>

		<p>Jenny has queried whether we can use our Sch 19B power for an SI that hasn't been made. Jane to consider whether we can use this power and report back. Kate subsequently asked for this query to also include a scenario where an SI has been made but hasn't come into force.</p> <p>This will help us decide what to say in our communications with the parties when sending further guidance. Two potential options are to:</p> <ol style="list-style-type: none"> <li>1. Write to the parties referencing the factsheet and explain that received dates are now very important so please include them in Q3 report. And explain that we may ask them to re – confirm those dates at a later time;</li> <li>2. When we're sure of our legal powers or when the Order is made we can write to the parties again explaining that we'll be using our disclosure power to re-confirm the accuracy of the received dates.</li> </ol>			<p>disclosure notice used until the Order is made.</p> <p>LE said that we'll ask the parties instead of requesting relevant information and advise that we'll publish information if we're satisfied with the right information.</p>
September	Media statement	Useful for Cahir/Comms and NIO Comms people to start talking about media statements and timings. We presume the Commission will want to make some sort of statement when the Order is laid?	Cahir Hughes	5-14 September 2017	28.9 - NI office meeting with NIO nearest to the Commission
September	Use of schedule 19B disclosure power	Compliance needs to take a decision about the occasions when we want to use the disclosure notice power and how this will be framed, so that guidance can work out how to incorporate our explanation of this into letters, guidance, factsheets etc, and so that a formal disclosure notice template can be prepared to be used as appropriate	Louise Edwards/John Franks	8-15 September 2017	28.9 - Following advice, compliance will use disclosure notice power before the Order is made. They will write to the parties instead of requesting the relevant information and confirm that we will publish any information until we have the right information.

					information.
September	Details of enquiries	Logs of enquiries to be sent to guidance to help planning factsheets/guidance/letters	<b>Ann Watt</b>	8-15 September 2017	AW - Factsheet co questions so far s we need this
September	Communications with councillors	Should we try to contact councillors and independents – is it worth it?	<b>Ann Watt</b>	15 September 2017	AW - No I think w done enough if w MPs, MLAs and p
September	PEF online link	Update letter to include a link to PEF Online so parties can report via PEF if they wish to.	<b>Martin Carr</b>	28 September 2017	MC - Updated le October 2017  16.11.17. Agreed that the would not be of option to report PEF Online at th Letter updated reference to rep through PEF On
October	List of implementation points spotted during consultation on Order to be handed over and discussed with Financial Reporting and Legal	Kate (and Jenny) to finish the list of implementation points that they spotted during work on the consultation on the Order, send it to John, Umar, Robin, Jane etc, and then have a discussion/s as necessary to check that all points have been covered in the plans to date or been added into the list of further planning to be done.	<b>Kate Engles</b>	27 October 2017 (to finish the list and share it)	16.11.17 - ACTIO Kate to provide for the next mee circulate
October? (when final draft Order is shared with EC by NIO)	Kate and Jane	Make a <a href="#">diagram timeline</a> illustrating the likely 'made' and 'coming to force' dates of the Articles in the Order, so that everyone is clear when the Article that amends s71E (and the equivalent for loans) will be amended to allow the EC to begin publishing. <b>NO</b> disclosure can be lawfully be made until those Articles are in force and have amended PPERA	<b>Kate Engles and Jane Draper</b>	Depends on when NIO give the final draft Order to us (3 days after they give it to us)	16.11.17 - ACTIO Kate Engles to s at NIO and feed group.

		accordingly.			
October	Register of donations/loans (GB/NI)	How do we display the new data? Do we need to create a new register? How long to implement the system? See emails of 29 September from JD to UH/KE.	<b>Umar Hanif/John Franks/Louise Edwards/ Jane Draper</b>	13 October 2017	<p>16.11.17 - ACTION Need to speak to TRIAD about how notice they need the changes to the and get it live?</p> <p><b>28.11. 17 Umar about timings. V know this information planning purposes</b></p> <p><b>COMPLETED 30.11.2017. Umar confirmed that ½ a day to implement changes to the Online will also a short time as the changes.</b></p>
November	Publication	When do we publish the Q3 data?	<b>Louise Edwards/John Franks/Ann Watt</b>	December	<p>ACTION – Ann Watt prefer the data published the data Order comes into</p> <p>ACTION - 28.11. PFR will prepare ready to be published early 2018. Give the Order are un this stage a view</p>

					taken as to when we publish the Q4 data at the same time or at a later point in time. <b>Lo</b> <b>Franks speak with Ann</b> <b>views.</b>
November	Publication	Provision that we must publish party data before reg donee data	<b>Louise Edwards/John Franks/Kate Engles</b>	December	ACTION - 28.11.17 Kate confirmed that we need an explanatory memo. Order say different about the publication of donee data. We need to ascertain the right time. That seems to be the case. We can't publish party data before regulated. So party data must be first. The memo suggests that the data can be published simultaneously.
November	Q3 data – aggregation of donations (received dates)	Need to write to the parties to request additional information from their Q3 returns. Has this been done? Timings? Q4 data? Position if we don't have information?	<b>Louise Edwards/John Franks</b>	8 December 2017	ACTION – 28.11.17 Need to call the parties to chase the information before COP on 1. Need to also inform parties that we need the donations information if we don't have a complete information. Same required for Q4.

					been advised th this information
September	Letter to parties	Include a paragraph in the letter to parties about requesting the received date from parties in the absence of using a disclosure notice. Confirm that we won't publish until we have this information.	Louise Edwards	6 October 2017	LE - updated let October 2017
September/October	Audit of Q1 and Q2	Audit check of Q1 and Q2 reports	John Franks	29 September 2017	
September/October	Adapting to the new system of partial confidentiality	<p>Compliance will need a simple flowchart to help with checking returns. This might cover various scenarios (aggregation of donations, changes to loans etc) to help the team adapt to a new system where some things are required or permitted (sometimes depending on our judgment) to be published and other things are still required to remain confidential.</p> <p>Kate/Jenny has done some work on setting out various examples which could help with the production of the flowchart. Kate can talk this through with John Franks (or someone from his team)</p> <p>Flowchart to be approved by legal to ensure it accurately reflects the law.</p>	John Franks/ Kate Engles	6 October 2017	<p>16.11.17 – ACTION Umar/John to get confirmation from the flowcharts a sound and fit for Ensure it captures benefits and the understands the</p> <p>ACTION - 28.11. Jane to spend th checking the flow feeding back he Louise mentioned doesn't want an complicated pro than the flow ca recognise where complex issue a you should be d an issue should</p>
November	Pre July late donations – Q4	Change to the Order that was laid - systems to check that any pre July 17 late donations are captured in our processes	Umar Hanif/John Franks	15 December 2017.	
October	Test run of data and publication	Compliance to undertake a test run of Q3 data from 2016 to	John Franks/	13 October 2017	COMPLETED

		show what information we would publish under the new rules. This will test our processes and procedures.	Umar Hanif		16.11.17 PFR have successfully test data from C are satisfied that required processes in place when we report transparency.
October	Aggregation of donation and loans	<p>There is a potential disconnect between how aggregated donations operate under PPERA and what the parties report and the Commission chooses to accept/publish. This may result in having to inform the parties of a change of approach to reporting aggregated donations in accordance with the law.</p> <p>Depending on outcome, discussions may need to involve Bob, Louise and Ann.</p> <p><b>MUST CHECK AGGREGATED DONATIONS FOR NI PARTIES. PROHIBITED FROM PUBLISHING AGGREGATED DONATIONS FROM THE SAME SOURCE BELOW £1,500 AFTER £7,500 HAS BEEN EXCEEDED.</b></p>	Martin Carr/Sam Nicholson/John Franks	<p>13 October 2017</p> <p>5.10.2017 <b>MC spoke to Bob, Louise and Ann. Agreed that this is an over reporting issue and that the risk of any challenge is low.</b></p> <p>Agreed that</p> <ol style="list-style-type: none"> <li>1. MC would seek legal advice on the register of donations to confirm we can publish donations under the reporting thresholds (email sent on 5.10)</li> <li>2. We'd explain</li> </ol>	<p>13 October 2017</p> <p>Walker confirmed aggregation of donations work as we thought PPERA. This means table in the facts correct.</p> <p>She needs further consider whether any register of donations implications.</p> <p>18 October 2017</p> <p>Walker provided the register of donations. The advice does not raise significant issues on way parties currently report donations are associated with</p> <p>19 October 2017</p> <p>Carr emailed Bob Louise E about transparency asked for their input</p>

				to parties on a case by case basis and more generally at the PPP (NI, Wales, and Scotland equivalents) that parties can report the PPERA way or the current way.	following legal a  19 October 2017 Agreed there was to inform the parties guidance should to ensure it does with the aggregated approach.
October	Publication of regulated donee data	Agreed that we should aim to publish regulated donee data at the same time as parties. Compliance need to look at potential cut off dates for regulated donee information and how this will work in practice	John Franks/Umar Hanif	13 October 2017	
October	Publication	Update <a href="#">NI QMS</a> to reflect the new rules	John Franks/Roisin McDaid	20 October 2017	16.11.17 - ACTION Roisin to update reflect the new
September/October	Decision making for publication	<p>The Commission needs a clear decision-maker for publication, and an alternate decision-maker. For example, the decision-maker could be the Head of Regulation in consultation with the Head of the Northern Ireland Office, and the alternate could be the PFR Director. This should be documented in the Executive Scheme of Delegation.</p> <ol style="list-style-type: none"> <li>1. Check Bob, legal and others agree</li> <li>2. Relevant decision makers needs to be formally informed (email)</li> <li>3. Scheme of delegation needs to be updated (Kairen Z is the relevant person we think)</li> </ol>	Ann Watt	27 October 2017	COMPLETED  12 October 2017

October	Donation before / after 1 July	One additional thing which staff will need to consider is the need for the Commission to reasonably hold the belief that a donation/loan was received/entered into on or after 1st July before it takes a decision to publish it. This is something that the Order is adding into PPERA, in relation to lifting the s71E and s71Z4 prohibitions on publishing NI donations or loans.	<b>Umar Hanif/ John Franks/Louise Edwards</b>	27 October 2017	<p>16.11.17 - ACTION Processes, process QMS to capture Louise Edwards understand what are publishing so and avoid the Co publishing inform shouldn't.</p> <p>The processes s points along the route where me staff check the c moves onto the</p> <p>Does scheme of need updating?</p>
October	We expect the Order to be 'laid' sometime after 9 October, after Parliament returns. It is not clear how long it will take to be 'made', because it depends on the timetabling of debates in the HoC and HoL of some kind of scrutiny committee or delegated legislation committee or both – details TBC by NIO/Parliament. We are also waiting to hear if there will be a delay of 21 days between the Order being 'made' and 'coming into force'. As of, 18	<p>We will send parties/reg donees a letter to confirm when the Order is 'laid' and re-confirm what they need to do in October and what we plan to do in November or December about publication.</p> <p><b>Order laid on 23 November. Factsheet published on 23 November. Letter sent on 24 November.</b></p>	<b>Martin Carr/Sam Nicholson</b>	October 2017	<p>16.11.17 Following discuss meeting on 16.1 agreed that sub returns through for NI parties sh encouraged unt as we are sure t online is fit for p</p> <p>MC agreed to ch letter to the par donees to say th Online should ne</p>

	October, we are waiting for an update from NIO.				until such time as implemented up following change
October	Publish amended guidance and forms for Q4	Want to be in a position to publish amended guidance and forms soon after the Order is made. Also need to publish website updates on parties and reg donees pages	<b>Martin Carr/Sam Nicholson</b>	October 2017	
November	Briefings for MPs, letters during the Order going through Parliament	Ann/Cahir and Kate to discuss whether we need to brief MPs on the Order and send letters etc. Also need to speak with NIO to see what they are doing and whether we can support this work. This needs to be discussed at an external issues meeting.	<b>Kate Engles/Ann Watt</b>	December 2017	
November/December	Media statement about publication	Issue another press release on publication of first set of data	<b>Louise Edwards/John Franks/Cahir Hughes</b>	November 2017	
November	Develop LTT likely FAQs for media enquiries.	Look at existing LTT and FAQs anticipate likely questions about new regime and formulate answers. Fact sheet useful source of what we will /will not publish.	<b>Cahir/Umar Hanif</b>		
December	FOI192 / 17	Under Freedom of Information legislation please provide me with a copy of all documents held by the Electoral Commission during the months of September, October and November 2017 including letters, internal correspondence, reports, research, reviews, briefing documents, minutes of meetings, emails and memos that make reference to plans to implement legislation in Westminster lifting the ban on naming donors to political parties in Northern Ireland.	<b>Ann Watt</b>	5 January 2017	
Oct/Nov	Update PEF QMS procedures	Create a new NI QMS that blends with the GB QMS so the processes are consistent.  Identify QMS procedures that deal wholly with NI donations and loans – amend/add new to ensure these reflect	<b>John Franks/Umar Hanif</b>	December 2017	

		<p>procedures for 'old' and 'new' regime .- Possible late donation reports will have to be dealt with under old regime as will changes to pre 2014 loans?</p> <p>Agree physical handling procedures for all future post July 2017 donation and loan reports. After first publication will these now all be scanned in NI and London will upload onto PEF online? Where will permissibility checks be carried out? London/NI? Will these arrangements be incorporated into PEF 59 – or do we need a separate procedure for NI returns?</p>			
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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 24 November 2017 13:20  
**To:** Ann Watt  
**Subject:** NI D and L update

Hi Ann,

This is the email I sent regarding the amended PEF 77 procedure. [REDACTED] is working on PEF 77a. Could you ask at the meeting on Thursday if all have fed back comments to me so that I can get it formally adopted on the QMS system please.

The Q3 2017 letters are now with [REDACTED] for sign off and 'should' be posted recorded delivery from London today. Copies on the N drive on the NI transparency folder – Q3 Follow up letters and then in the relevant party folder if you would like to see any of them.

(Also can you remind the people to make sure that when we are sending guidance etc that we are using the most up to date list of treasurers names – some of the treasures on the current list which [REDACTED] got are out of date – didn't matter as the letters were not addressed to individuals – but could be an issue down the line if we don't use the most up to date details on CCM )

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 20 November 2017 15:46  
**To:** [REDACTED]; Ann Watt; Louise Edwards  
**Cc:** [REDACTED]  
**Subject:** NI D and L Handling procedure – PEF 77

Hi All,

Below is the link to the amended PEF 77. The amendments reflect changes that will be brought about as a result of the transparency order. I have referred to PEF 77a which will be the interim procedure covering processing of Q3,4 2017 returns (Which [REDACTED] is working on). The two procedures will be interlinked at least for a transitional period (not sure how long that will be- we need to agree this).

If you could let me have any comments by close of play **Tuesday 28 November** that would be helpful.

:

<http://skynet/dm/Functions/PEFpol/HMG/Confidential%20NI%20donations/Compliance/PEF77%20Handling%20NI%20Donation%20and%20Loan%20Returns%20-%20Nov%202017.doc>

[REDACTED] – CCing you for information )

Please give me a shout if you would like to discuss the procedure.

[REDACTED]  
**Senior Officer (Political Parties Liaison)**  
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[REDACTED]

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**From:** Ann Watt  
**Sent:** 02 October 2017 14:49  
**To:** [REDACTED]  
**Subject:** Existing loans

Hi [REDACTED]

As you know, [REDACTED] is mapping out the compliance actions needed following receipt of the Q3 donation and loan returns.

He needs to be able to view the records we have of existing loans, in order to check whether anything reported about changes to loans should be published.

Ideally he would like to have a list of all outstanding loans to enable quick checking. Does this exist? I suspect not, although it could be created by going through all the returns and creating a new document on the n: drive.

Plan B would be that he would just get the information he needs by accessing the actual returns on the n: drive, but that would mean looking through individual returns each time.

Grateful for your thoughts.

Ann

[REDACTED]

---

**From:** Ann Watt  
**Sent:** 05 October 2017 14:03  
**To:** [REDACTED]  
**Subject:** Donation and loans - letter to NI MPs, MLAs and parties

Hi [REDACTED] – next week (possibly Tuesday although not confirmed) the legislation to enable the publication of the donation and loans data for NI will be laid in Parliament. We don't know what day yet, but it might be Tuesday. Once this happens, we need to email a letter to all Northern Ireland parties, MPs and MLAs. We have the letter approved and the email list ready, so it will only be a case of setting up a bcc email and pressing send.

Hope you will be able to do this but let me know if not.

thanks

Ann

[REDACTED]

---

**From:** Ann Watt  
**Sent:** 11 September 2017 15:09  
**To:** Anna Carragher  
**Subject:** Board papers

Hi Anna

I've read through the Board papers. Nothing specific to NI in any of the agenda items. So I haven't any comments apart from a few small things from the Chief Exec update:

[REDACTED]

[REDACTED]

Para 1.38 we're still waiting to hear when the SoS will lay the secondary legislation to enable publication of donations and loans. It might be this Weds afternoon. If not, the next possibility is w/b 16 Oct after party conference recess. Either way, we still aim to publish the first set of data in Nov/Dec. However, obviously we can't publish it unless the legislation is passed so there remains some chance of delay to the first publication.

Ann

**Ann Watt**  
**Head of Electoral Commission, Northern Ireland**  
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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 29 August 2017 13:42  
**Subject:** Changes to the confidentiality rules on donations and loans to Northern Ireland political parties and regulated donees made from 1 July 2017  
**Attachments:** Letter to NI parties August.pdf

Dear Treasurer

**Re: Changes to the confidentiality rules on donations and loans to Northern Ireland political parties and regulated donees made from 1 July 2017**

Please find attached correspondence for your attention.

Regards

[REDACTED]  
**Business Support Officer**  
The Electoral Commission, Northern Ireland  
Ground Floor, 4 Cromac Place  
The Gasworks  
Belfast BT7 2JB  
020 9089 [REDACTED]

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 November 2017 09:50  
**To:** [REDACTED]  
**Subject:** Changes to the confidentiality rules on donations and loans to Northern Ireland political parties and regulated donees made from 1 July 2017  
**Attachments:** MPs and MLAs emails 2017.xlsx; Copy of Email addresses of Northern Ireland Treasurers.xlsx

Morning [REDACTED]

Ann mentioned that you would be able to send the NI letters to parties and MPs/MLAs today – thanks for this.

This is the [letter](#) that needs to be sent about the changes to the rules. The same letter applies to both treasurers and MPs/MLAs.

It needs to be PDFd.

I've attached spreadsheets which include up to date emails of the party treasurers in NI and the MPs/MLAs in NI.

**Probably easier to cut and paste all the emails into the BCC box so all the emails remain private.**

The email text is below and the subject line is included in this email.

Let me know if any of this isn't clear.

[REDACTED]

**Re: Changes to the confidentiality rules on donations and loans to Northern Ireland political parties and regulated donees made from 1 July 2017**

Please find attached correspondence for your attention.

Regards

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 November 2017 11:04  
**Subject:** Changes to the confidentiality rules on donations and loans to Northern Ireland political parties and regulated donees made from 1 July 2017  
**Attachments:** letter to NI parties - order laid.pdf

**Re: Changes to the confidentiality rules on donations and loans to Northern Ireland political parties and regulated donees made from 1 July 2017**

Please find attached correspondence for your attention.

Regards

**Ann Watt**  
**Head of Electoral Commission, Northern Ireland**  
The Electoral Commission, Northern Ireland  
Ground Floor, 4 Cromac Place  
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Belfast BT7 2JB  
020 9089 4020

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[REDACTED]

---

**From:** Ann Watt  
**Sent:** 17 November 2017 12:44  
**To:** Claire Bassett  
**Cc:** [REDACTED] Bob Posner; Craig Westwood  
**Subject:** Donations and loans in NI - draft letter from Sir John Holmes to Sec of State for Northern Ireland

Hi Claire – as well as our press statement next week on donations and loans in NI, we think that John should write to the Sec of State for NI setting out the Commission's views on the delay in a bit more detail. We would publish this letter.

[REDACTED] has written a [draft letter](#) which has been cleared by Bob, Ben and Legal.

Subject to your views, are you happy to speak to John about approving this letter early next week? The press statement is going out on Thurs 23<sup>rd</sup> so the letter would need to be sent by then at the latest.

I'm not working this afternoon but [REDACTED] is around if you want to discuss.

thanks

Ann

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[REDACTED]

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**From:** Ann Watt  
**Sent:** 11 September 2017 12:52  
**To:** [REDACTED] Ben Wilkinson; Louise Edwards; Bob Posner  
**Cc:** [REDACTED]  
**Subject:** Draft media statement - donations and loans in Northern Ireland

Hi all – I've drafted a [media statement](#) for release when the NI donations and loans legislation is laid in Parliament. It is still not clear when this will be, but there is a possibility it will be this Wednesday afternoon (if not, the next opportunity will be w/b 16 Oct after the party conference recess).

I'd be grateful for any comments on the draft by noon tomorrow (Tues).

Ann

[REDACTED]

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**From:** Ann Watt  
**Sent:** 16 October 2017 10:12  
**To:** [REDACTED]  
**Subject:** Email addresses for MPs, MLAs, parties

Hi [REDACTED] – [REDACTED] is preparing an email with the donations and loans letter and factsheet for NI MPs, MLAs and parties, to be sent once the Order is laid in Parliament (possibly on Weds, but nothing definite yet). Do you have a distribution list she could use?

Ann

**From:** FOI  
**Sent:** 06 December 2017 10:44  
**To:** Louise Edwards  
**Cc:** FOI  
**Subject:** RE: FOI 192/17 Naming donors to Political Parties

## FOI 192/17

Dear Louise,

The Commission has received the following FOI request:

**Under Freedom of Information legislation please provide me with a copy of all documents held by the Electoral Commission during the months of September, October and November 2017 including letters, internal correspondence, reports, research, reviews, briefing documents, minutes of meetings, emails and memos that make reference to plans to implement legislation in Westminster lifting the ban on naming donors to political parties in Northern Ireland.**

**If this time period is too long to comply with cost and time exemptions, please provide me with the same information for the longest time period possible. For example, if three months is too long please provide me with the documents for October and November 2017. If this still breaches time and cost exemptions please provide me with the documents for the period of November 2017. If this is still too long please provide me with the longest time period possible starting backwards from Friday 24th November.**

For information, here is a link to the [FOI Internal Procedure](#)

You have been identified as the MT member responsible for preparing the response and ensuring that it is sent out to the requester as soon as possible and within the 20 working days statutory deadline for FOI requests. For this request the 20 working day deadline falls on but we should aim to get the response out in advance of that date if possible.

**If you are not the right MT member to lead on this request, it is your responsibility to pass on the request to that person as a matter of urgency.**

Please update the FOI log every Friday with details of the progress in responding to the request. This should include the risk level and who is involved in preparing the response.

- If Third Party consultation is required, please ensure that this is done at the earliest opportunity, preferably by the end of day 3. This will ensure little hold up in made in preparing the response.
- If you decide that this FOI is deemed high risk, please inform me as soon as possible so that we can plan a realistic schedule to meet the deadline.

Please insert your answer to the request into this relevant [FOI Response Letter Template.docx](#)

Once the draft has been completed, and approved if it is a higher risk request, please send it to the Information Management team who will send the response out to the requester.

All emails and documents that need to be retained as a record of the Commission's actions in responding to the request should be stored in this folder: Skynet/DM/Functions/Information Management/FOI DPA Requests/ Naming donors to Political Parties.



As MT lead for this request, is your responsibility to ensure that they are there ready for review in the event of a request for internal review of an FOI response, or a request for information from the Information Commissioner's Office.

**Please can you also fill in the time recording sheet for this FOI request here [Time Recording FOI 192 17.xlsx](#)**

**Enter time in 15 minute segments e.g. 15 minutes = 1; 30 mins = 2; 45 minutes = 3; 60 minutes = 4, etc. This is cumulative time per task across the entire FOI rather than by day. Select your team from the dropdown menu options.**

Please get back to me with any questions.

Kind regards,

  
**Information Management Adviser**  
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[REDACTED]

---

**From:** Ann Watt  
**Sent:** 13 October 2017 09:57  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Donations and loans legislation - letter to NI stakeholders

Hi [REDACTED] – on Weds 18th the long-awaited donation and loans legislation may be laid in Parliament. We have a letter ready to Northern Ireland MPs, MLAs and parties. Please can you incorporate sending this letter into your plans for next week. It will be a bcc email with a letter attached (no hard copies). Email addresses have been compiled already so it should be straightforward.

Hope this is OK but let me know if not.

Ann

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 September 2017 12:44  
**To:** [REDACTED]  
**Subject:** FW: NI donations transparency order update CCM:0173402

Hi [REDACTED]

Are you around on Wednesday / Thursday to help publish some NI website updates?

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 September 2017 12:30  
**To:** [REDACTED] Ann Watt; Bob Posner; Tom Hawthorn; [REDACTED]  
[REDACTED] Louise Edwards; Joanne Crofton-Diggins; [REDACTED]; Louise Footner; [REDACTED]  
**Subject:** RE: NI donations transparency order update CCM:0173402

Hello

I have an update from [REDACTED] at NIO.

Apparently it is still possible that the Order will be laid this week (so I misinterpreted the lack of updates on Friday, sorry about that!).

I think that we will hear tomorrow afternoon whether or not it will be laid

The possible laying slot is Wednesday afternoon.

So, [REDACTED] Ann and Bob, it seems sensible to carry on with preparations for responding to the laying of the Order –ie: signing off the factsheet, our statement and website update etc.

Thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 September 2017 10:11  
**To:** [REDACTED] Ann Watt; Bob Posner; Tom Hawthorn; [REDACTED]  
[REDACTED]; Louise Edwards; Joanne Crofton-Diggins; [REDACTED] Louise Footner; [REDACTED]  
**Subject:** NI donations transparency order update

Hi

Just to let you know that I didn't hear anything from [REDACTED] at NIO on Friday so I think that means that he didn't secure a laying slot for the SI this week.

If that's the case, I think he will now be trying to secure a slot for w/c 16 oct, which is after the party conference recess. At the moment, we can't tell if that would affect our projected publication date of late Nov/early Dec, because that depends on progress of the SI with committee slots and how quickly it could be made during October and November. It is still possible to 'make' the SI in time for the anticipated publication date but we'll have to see what happens

I'll update you when I hear something from [REDACTED] (and I'll call him today to chase)

Thanks

[REDACTED]

Sent from my iPhone

On 8 Sep 2017, at 15:02, [REDACTED] wrote:

All bets are off for Monday then.

---

**From:** [REDACTED]  
**Sent:** 08 September 2017 14:59  
**To:** [REDACTED]  
**Subject:** RE: Missed conversation with [REDACTED]

Not yet!!

---

**From:** [REDACTED]  
**Sent:** 08 September 2017 14:34  
**To:** [REDACTED]  
**Subject:** Missed conversation with [REDACTED]

[REDACTED] 14:32]:  
Any news?

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 September 2017 10:00  
**To:** [REDACTED]  
**Subject:** factsheet ....  
**Attachments:** Draft NI Order factsheet version for NIO 18082017.docx

Original version of factsheet attached

Later version at this link: [Draft factsheet that we intend to publish when the Order is laid](#)

Im struggling a bit with the examples ☹.....

Text of email to [REDACTED] below

Im looking at the legislation and wondering if the approach in the updated factsheet arises from the way the legislation refers to a donation /a benefit causing the aggregated amount to be more than £7,500 has to be recorded in the report for the reporting period in which it was accepted

So in the scenario where the individual gives 1K a month, **the** donation that causes the 7.5K threshold to be exceeded is the August one because it is **the eight** donation “when if it is added to any other relevant benefits the aggregate of the benefits is more than £7.5K” – this aggregate (8K in this example) must “be recorded together with any other relevant donations included in the aggregate amount in the donation report for the reporting period in which **the** benefit causes that aggregate amount to be more than 7.5K accrues”

Whilst the 9<sup>th</sup> donation in September is accepted in Q3 (and one would therefore assume it would be included in the Q3 report – and is what happens in practice I believe) technically it is only **the** donation which causes the 7.5K aggregate to be exceeded which must be recorded in the Q3 report. The reporting threshold for future donations from that source is then reset to 1.5K and the party has to report the next donation/s that cause the 1.5K to be exceeded .....

So the September donation is only 1K and therefore doesn't have to be reported in Q3 (even though its accepted in Q3) because the new threshold of 1.5 K is yet to be exceeded which causes a donation to be required to be reported in a return.



When the party receives donation number 10 in October it gets added to the September donation this accrues to 2k and these two donations now become reportable in the Q4 return because the donation that caused the 1.5K threshold to be exceeded was accepted in Q4 (and the September donation hasn't been included in a previous report so it now gets reported). The threshold gets reset to 1.5K again ....

Similarly the November and December 1K donations when added together exceed the 1.5K threshold and both of these fall to be included in the Q4 return along with the September and October donations .....

If the donations in November and December had dropped to £500 I don't think these would have to be included in the Q4 report because the 1.5K threshold would not have been exceeded again in the calendar year. (however in practice parties would include all aggregates in a given quarter)

??

Does that sound sensible if somewhat cumbersome.....

  
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[REDACTED]

---

**From:** FOI  
**Sent:** 06 December 2017 10:24  
**To:** [REDACTED]  
**Cc:** FOI  
**Subject:** FOI 192/17 Naming donors to Political Parties - Acknowledgement

Dear [REDACTED]

**Our Ref: FOI 192/17**

Thank you for your request under the Freedom of Information Act dated **05 December 2017** received by the Commission on **06 December 2017**, concerning:

**Under Freedom of Information legislation please provide me with a copy of all documents held by the Electoral Commission during the months of September, October and November 2017 including letters, internal correspondence, reports, research, reviews, briefing documents, minutes of meetings, emails and memos that make reference to plans to implement legislation in Westminster lifting the ban on naming donors to political parties in Northern Ireland.**

**If this time period is too long to comply with cost and time exemptions, please provide me with the same information for the longest time period possible. For example, if three months is too long please provide me with the documents for October and November 2017. If this still breaches time and cost exemptions please provide me with the documents for the period of November 2017. If this is still too long please provide me with the longest time period possible starting backwards from Friday 24th November.**

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

You may expect to receive a reply sent from the Commission by **05 January 2018**.

Yours sincerely,

[REDACTED]  
**Information Management Adviser**

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 22 November 2017 09:19  
**To:** [REDACTED]  
**Subject:** Form for Confirmation of details provided in donation report for Q3 2017  
**Attachments:** Form for Confirmation of details provided in donation report for Q3 2017.docx

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 October 2017 17:03  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Follow up letter requesting additional information on Q3 donation report

Hi [REDACTED]

<http://skynet/dm/Functions/PEFpol/HMG/Confidential%20NI%20donations/Compliance/Template%20letter%20confirmation%20of%20dates%20received%20and%20accepted%2023-10-17.docx>

I've had a go at drafting a letter to the party that has not provided the received and accepted dates in its Q2 and 3 donation reports. As you know this exercise has raised a few questions. I've left a few questions and comments on the letter and I think [REDACTED] will need to make a call on the tone /approach we are going to use. Also I'm still confused about when we can use the disclosure notice powers if we need to use this to get information (can we only use them once the order is laid or made or can we use the power regardless of the order?). I referred to use of this power in the letter but we may not want to refer to this at this stage – I'm mindful that parties may be slow to respond to requests for additional information and hence I hoped this would encourage them to respond by the date in the letter without recourse to formal action.

I also think that it might be helpful to document the individual steps that we will take to confirm the information in reports before publication so that we are covering ourselves in terms of being able to demonstrate that we have 'reasonable belief'. I know that you have a flow chart to help us decide whether or not we can form reasonable belief and I don't want to create documents for the sake of it but I want us to be confident that if we are challenged at any stage that we can demonstrate we took all steps we should have and that's documented -maybe we just need to log all the correspondence relating to a particular party's report? You mentioned that some of this may be covered in the master publication spreadsheet so maybe we could document it there?

Let me know what you think and thanks for your help over the last couple of days on this.

I'm not in the office tomorrow but will be back in on Thursday.

Regards

[REDACTED]  
**Senior Officer (Political Parties Liaison)**

The Electoral Commission

Ground Floor

4 Cromac Place

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 04 September 2017 11:19  
**To:** [REDACTED]  
**Subject:** FW: NI factsheet legal review

Hi – when you get a second, can you cast your over the NI factsheet. Don't worry too much about the text –it's more the appendix representing the aggregation rules to see whether it's clear to you. I think it is and legal seem happy but equally would appreciate your view.

<http://skynet/dm/Functions/PEFpol/Potential election events/NI confidentiality Order factsheet 2017.docx>

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 20 November 2017 11:22  
**To:** [REDACTED]  
**Subject:** FW: Q3 donations and borrowing

FYI – and handling plan is here:

<http://skynet/dm/Functions/CommStrat/Handling%20plans/Handling%20plan%20Q3%202017%20donations%20and%20loans.docx>

---

**From:** [REDACTED]  
**Sent:** 17 November 2017 17:31  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Q3 donations and borrowing

Thanks [REDACTED] A few suggestions across the documents around absolute clarity / accuracy in what we say. Nothing substantial.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 17 November 2017 16:39  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Q3 donations and borrowing

Hi [REDACTED]

Copying in [REDACTED] and [REDACTED] for their information around Northern Ireland.

Q3 donations and borrowing is now ready for your review and sign off. The [summary](#), [press release](#), [social media](#) and [LTT](#) can all be found in the links here.

The statement on Northern Ireland which [REDACTED] has put together is here:

<http://skynet/dm/Functions/media/Press%20releases/Media%20statement%20-%20NI%20donations%20and%20loans%20Q3.docx>

It would be great if you can have a look over these and send over your thoughts by Monday afternoon please?

Once signed off, we'll send them off for translation, which will hopefully be by close of play Monday.

Thanks for all your help,  
[REDACTED]

[REDACTED]  
**Senior Communications Officer (Media relations)**

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 November 2017 09:02  
**To:** [REDACTED]  
**Subject:** FW: update to other page on the website

Morning – could you pick this up when you have a spare 10 mins please.

The factsheet loaded ok in the end!

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 18:24  
**To:** [REDACTED]  
**Subject:** update to other page on the website

Hi

As mentioned, I think we should do a small update to this page – do you have the editing rights to do that? (If not, we could ask [REDACTED]?)

<https://www.electoralcommission.org.uk/find-information-by-subject/political-parties-campaigning-and-donations/donations-and-loans-to-political-parties>

The text in yellow (underneath) is going to an old out of date consultation from 2013. We should update the line to say “The Government has laid draft legislation which provides for more transparency on party funding in Northern Ireland”, and the link could go to the NIO page on the order, here

<https://www.gov.uk/government/publications/transparency-of-donations-loans-northern-ireland-political-parties-order-2018>

It would also be good to add a link to your factsheet from this page.

Thanks  
[REDACTED]

**There are rules controlling the donations and loans that political parties receive. This page contains an overview of the rules.**

There are rules on who can make donations and loans to political parties and other campaigners. For instance, individuals can only donate if they are on an electoral register.

Parties have to record the donations and loans they receive, check they are from a permissible source, and report larger donations and loans to us. In Great Britain, we [publish these donation and loan reports on our online database](#) to ensure there is transparency about the funding of parties.

There are currently different rules on the reporting of donations and loans to parties in Northern Ireland. They must report donations and loans to us in the same way as parties in Great Britain. However, we are currently barred from publishing this information.

The [Government has consulted on draft legislation](#) which provides for more transparency on party funding in Northern Ireland. Once passed, this legislation will allow us to publish more information about the donations and loans that parties in Northern Ireland report to us.

**Policy Manager (Lead on regulation of political finance)**

**The Electoral Commission**

Direct telephone: 020 7271 [REDACTED]

Switchboard: 0333 103 1928

[REDACTED]@electoralcommission.org.uk

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 September 2017 13:43  
**To:** [REDACTED]  
**Subject:** factsheet

Hi [REDACTED],

I've looked at the other two examples on the factsheet now and they make sense given the rational set out in the legislation we discussed.

Good to chat to you earlier.

Please let me know what the outcome of your chats with [REDACTED] and [REDACTED] are.

[REDACTED]

[REDACTED]  
**Senior Officer (Political Parties Liaison)**

The Electoral Commission  
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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 16:39  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Transparency in Northern Ireland - update

FYI – statement now signed off.

[REDACTED] can you send this to the Guardian journalists please?

**Ann Watt, Head of the Electoral Commission in Northern Ireland said:** “We are pleased that the UK Government has acted to make this important change a reality. Transparency in how our political parties are funded is key to ensuring public trust and confidence in the democratic process. We hope to be able to begin publishing this information early in the New Year.”

[REDACTED] just checking I'm okay to tweet the below?

Legislation has this afternoon been laid before Parliament to provide for transparency of political donations in Northern Ireland: <https://www.gov.uk/government/publications/transparency-of-donations-loans-northern-ireland-political-parties-order-2018>

[infographic with Ann's quote]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 16:36  
**To:** Craig Westwood; Ann Watt; Bob Posner  
**Cc:** Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Ann has approved this so issuing to NI media now

Thanks  
[REDACTED]

---

**From:** Craig Westwood  
**Sent:** 23 November 2017 15:47  
**To:** [REDACTED] Ann Watt; Bob Posner  
**Cc:** Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

This makes it sound like either 1) we think the government has acted in response to our statement this morning, or 2) the govt has acted quickly in all things on this issue. Tell me if I'm wrong, but I don't think we want to imply either of those things.

Suggested version below which focuses on why this matters – have also suggested saying ‘begin publishing’ as it's good to emphasise that this isn't a one-off :

“We are pleased that the UK Government has acted to make this important change a reality. Transparency in how our political parties are funded is key to ensuring public trust and confidence

in the democratic process. We hope to be able to begin publishing this information early in the New Year.”

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 15:32  
**To:** Ann Watt; Bob Posner  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Small but important change suggested by [REDACTED] – Given that announcement is now imminent from NIO I would be keen to get a quick signoff on the below if possible

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 15:20  
**To:** Ann Watt; Bob Posner  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Increasing speculation now that the Order will be laid this afternoon in Parliament.

In such an event I don't think a long winded press release is necessary given how events have unfolded today. I would suggest we send the following:

**In response to the Secretary of State's announcement that legislation has now been laid in Parliament Ann Watt, Head of the Electoral Commission in Northern Ireland said:**

“We are pleased that the UK Government has acted quickly to lay this Order in Parliament today. Once it comes into force we will be able to publish important information on how political parties in Northern Ireland are funded. We ~~now expect to hope to~~ be able to publish ~~the information we had hoped to publish today early this information~~ in the New Year.”

Grateful for thoughts on this approach.

[REDACTED]

---

**From:** Ann Watt  
**Sent:** 23 November 2017 13:25  
**To:** Bob Posner; [REDACTED]  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

(For info, Lee Reynolds is a DUP councillor who is the party's representative on the Northern Ireland Assembly Parties Panel, so he is someone we work with often.)

Thanks Bob, I will reply in these terms.

It is a peculiar thing to say given that our statement today said nothing about the DUP.

Obviously I am beyond annoyed by this ridiculous allegation, and the fact that it was sent in this informal manner from an iPhone to [REDACTED] If the DUP has a real complaint, let's hear it through the proper channels.

But I will stick with Bob's suggestion and express my "disappointment" in more measured terms!

Ann

---

**From:** Bob Posner

**Sent:** 23 November 2017 13:14

**To:** [REDACTED]

**Cc:** Craig Westwood; Claire Bassett; Ann Watt; Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Thanks [REDACTED] I suggest for Ann or you to respond expressing disappointment at their comment as our release of information today is on the usual cycle publication date for such.

Bob.

---

**From:** [REDACTED]

**Sent:** 23 November 2017 12:42

**To:** Craig Westwood; Claire Bassett; Ann Watt; Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Have just received this email from the DUP:

[REDACTED]

The timing of this is politically dubious only two days before our party conference.

This seems to be developing into a pattern of behaviour by the Electoral Commission ie its release of information about the DUP during the Assembly campaign.

Lee

Sent from my iPhone

We will obviously want to strongly dispute this allegation.

[REDACTED]

---

**From:** Craig Westwood

**Sent:** 22 November 2017 15:56

**To:** Claire Bassett; [REDACTED]; Ann Watt; Executive Team; Louise Edwards; John Franks; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Agree with Claire and Bob, let's press ahead

---

**From:** Claire Bassett

**Sent:** 22 November 2017 15:53

**To:** [REDACTED] Ann Watt; Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Hi

Interesting times- I agree with Ann. I think we are disappointed to be at point where we are publishing other info without it and that doesnt change if they lay order tomorrow, also letter likely to be out there before long and as sent that cant change it.

If want to soften it we could add something along lines that we look forward to publishing data when order is laid and hope that will be soon...but not sure will help much

thanks

---

**From:** [REDACTED]  
**Sent:** 22 November 2017 15:49  
**To:** Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

All

[REDACTED] has just spoken to [REDACTED] at the NIO who has confirmed that internal clearance has now been given to lay the Order. It is possible that this may happen as soon as tomorrow. However I think, given our experience to date, this is far from guaranteed.

As most of you will know a letter was sent to the Secretary of State from John yesterday:  
[HolmesJ-to-BrokenshireJ-12017-11-21-NI Donations Loans.pdf](#)

We are due to publish our media statement tomorrow at 9:30am expressing our disappointment with the Order not being laid:

<http://skynet/dm/Functions/media/Press%20releases/Media%20statement%20-%20NI%20donations%20and%20loans%20Q3.docx>

I would welcome views on how we now proceed with this in light of this development. These are a few points I think are worth considering:

- It continues to be the case that we are disappointed to not publish NI donations tomorrow as we originally expected. I have already advised a few journalists here that an 'update on donations to Northern Ireland' will be made on 23 November when we publish this information for GB parties. To my knowledge nobody is expecting us to announce it has been delayed.
- We could take the sting out of the press release tomorrow by acknowledging that legislation may now be imminent. However I don't think any of us can be fully satisfied that this will be the case and it could undermine us if there are further delays.
- If we keep the press release as is and the NIO do lay Order tomorrow they may say we are being 'unreasonable' as they advised us that it would be laid. (One could argue though that they only did so because of our letter to the SoS).
- Given the likely media interest in this issue I had committed to providing an advance copy of the press release to [REDACTED] at the NIO today. He hasn't asked me for it yet but thought it worth flagging.

Its Anns non-working day today but I have spoken to her and she is of the view that we press ahead with our original plan. She is not convinced that an Order will be laid in Parliament by 9:30am tomorrow morning and our statement reflects our continued position.

[REDACTED]

---

**From:** Ann Watt  
**Sent:** 10 November 2017 13:31  
**To:** Executive Team; Louise Edwards; [REDACTED]

Ben Wilkinson

**Subject:** Transparency in Northern Ireland - update

We met this morning with [REDACTED] from NIO. Not good news I'm afraid. The secondary legislation to enable publication of the NI donation and loan data is ready to be laid, but has been delayed. [REDACTED] did not tell us the reason for the delay. NIO's official line is that "the legislation is still going through internal government clearances".

[REDACTED] said that this delay could last for some time. On the positive side, he also said that progress could be made quickly at any point. So we should continue to press ahead with our preparations for publication of the first set of data.

We are due to publish the GB Q3 donation and loans data on 23 November, which is when we were expecting to publish the first set of NI data. Unless others disagree, on 23 Nov I think we should put out a strongly worded statement expressing our disappointment that the necessary legislation has not be laid. Given that the NIO has had to consult the Commission on the draft legislation, we might even say that we know that the legislation has been drafted and from our perspective is ready to be laid in Parliament.

Ann

**Ann Watt**  
**Head of Electoral Commission, Northern Ireland**  
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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 19 October 2017 09:20  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Publication of donations

Bob, Ann, [REDACTED]

You'll recall a little while back we discussed whether the way parties over report aggregated donations has any impact on the register of donations and what we publish. This point came about after we produced guidance for the NI transparency Order and discovered that historically parties over report donations in a way that isn't in accordance with PPERA (I forwarded that legal advice earlier in the week). At the time we felt relatively relaxed about this issue as long as it didn't have any unintended consequences for the register of donations. I asked for legal advice and that's below. In short I think we're okay to continue publishing donations the way we are but there are risks associated with that approach namely:

- donors donating amounts under the relevant reportability thresholds to privacy;
- and the expectation donors have as to the circumstances under which their details will be made public;
- consistency with the Commission's enforcement policy in relation to over reporting in spending returns (e.g. as in the Conservative Party case), which may need to be the subject of further legal advice.

My view is that we can continue our current approach so long as we're comfortable with the associated risks, but we should think about handling and how we communicate this to the parties (i.e you can report one way under PPERA but we understand that's burdensome so we're happy for you to continue to report the way you are). I'm on holiday from tomorrow, so will leave this with you to consider.

[REDACTED]

[REDACTED]

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**Electoral Administration and Guidance**  
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**From:** [REDACTED]  
**Sent:** 18 October 2017 16:42  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Publication of donations

Hi [REDACTED]

Following our discussion the other day, I spoke with [REDACTED] who recalled dealing with the aggregation point in 2014/5, but not with the question of over reporting of donations or publication of such donations in the register.

Please note that I use the term “donation” to include aggregate donations in this advice.

Where parties report donations of £1500 or less to the Commission (i.e. not recordable donations) in their s62 reports, is there an issue with the Commission publishing such donations in the register of recordable donations?

### Over Reporting of Donations

S62 PPERA requires political parties to prepare and submit quarterly donation reports, containing details of “recordable donations” – those donations which exceed £7,500, or, where a previous donation from the same source has exceeded £7,500, those donations which exceed £1,500. For the purposes of Part IV PPERA, any donation of £500 or less is disregarded.

For convenience, since about 2001 the Commission has allowed parties to “over report” and to include, in the case of multiple donations from the same source, all subsequent donations whether or not they exceed the recordability threshold of £1,500. This is on the basis that it is administratively more convenient for the parties, and within the spirit of the Act.

I have not been asked to advise specifically on this point, but I note that the recommendation of the [Neill Report](#) was that there should be clear rules on full public disclosure of donations to political parties of £5,000 or more in any one financial year from any one person or source. This was carried out in PPERA (the limit having been raised to £7,500 by the Political Parties and Elections Act 2009). The intention behind the donations reporting provisions is to ensure transparency and to improve public confidence in political party finances and the integrity of the political process.

However, the report noted that the arguments in favour of secrecy merited serious consideration: the right to privacy and anonymity in making donations; the right to privacy in respect of political affiliation; the consequences of disclosure; the risk of discrimination or intimidation. There were concerns that the publishing of donors’ identities would lead to a reduction in political donations.

The Committee identified that it was in the public interest “*for the public to know when a donation is made to a political party which is significant enough to prompt questions or to raise suspicion about its purpose*” (para 4.28), but not necessarily for the public to know the details of every donation made to a political party. Reporting of such minor donations would be unnecessarily intrusive and administratively burdensome. The limits of £500, £1,500 and £7,500 (as they currently stand) were therefore set to reduce this burden.

Given that some parties have indicated that it would be less administratively burdensome to simply report all subsequent donations from the same source, it may be appropriate to allow this. Reporting of such donations would not decrease transparency and gives the Commission a clearer picture of donations. However, there are potentially two issues with this: the first is the issue of the Commission’s publication of the recordable donations register under s69 (addressed below); the second is consistency with the Commission’s enforcement policy in relation to over reporting in spending returns (e.g. as in the Conservative Party case), which may need to be the subject of further legal advice.

### The Register

Under s69 the Commission is required to maintain a register containing details of all donations reported to them under Part IV PPERA. Any recordable donation reported by a political party under s62 must therefore be included within the register. However, any donation reported by a political party in a s62 return which is not required to be reported by virtue of that section as it is too small to reach the relevant threshold is not a donation reported under Part IV PPERA and is not required to be included in the register of recordable donations.

I understand that, whilst it is administratively convenient for parties to “over report” donations, it is less administratively convenient for the Commission to isolate those donations which do not meet the s62 definition of a “recordable donation” and to manage which donations are included on the register and which are not. There is nothing in s69 to state that the Commission may not include such donations in the register. Although s69 does not provide for the Commission to do so, it is arguable that the Commission may use its power under paragraph 2 schedule 1 to do so, if this would be a course of action calculated to facilitate, incidental or conducive to, the carrying out of its functions. However, there are a number of issues which must be considered, including the following:

- It is clear from the Explanatory Notes and the Neill Report that the purpose of the two-level reporting system (i.e. that donations of £500 and under do not count as donations at all for the purpose of this part of PPERA, and that donations over £5,000 (or £1,500 for additional donations) are publicly reportable) is to strike a balance between transparency and the rights and expectations of donors in relation to privacy (as set out above). Parties are required to keep records of smaller donations, whilst larger donations are made public.
- I note that s69 PPERA is titled “Register of recordable donations”. The Explanatory Notes state at paragraph 132 that this is intended to be a register of all donations reported to the Commission; however, it was not envisaged at the time of drafting that parties would actively choose to over report. It appears therefore that only recordable donations are intended to be included on the register.
- The factors set out in the Neill Report and referenced above relating to privacy are still relevant. I would also note that any potential donor visiting our webpage would not expect a donation falling under the relevant thresholds to be made public: see e.g. <https://www.electoralcommission.org.uk/find-information-by-subject/political-parties->

[campaigning-and-donations/donations-and-loans-to-political-parties/quarterly-donations-and-loans.](#)

- To protect the privacy and safety of individual donors, home addresses are not included on the register. This may be sufficient to grant privacy to some donors, but not to well known individuals.

The Commission must weigh the convenience and increased transparency involved in publishing all donations reported by parties under s62, whether or not they are “recordable” as defined in that section, against the right of donors donating amounts under the relevant reportability thresholds to privacy, and the expectation donors have as to the circumstances under which their details will be made public.

Do let me know if you would like to discuss this further

Thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 05 October 2017 14:43  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Publication of donations

Thanks [REDACTED]

[REDACTED]

will be looking at this and will be in touch as you suggest.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 05 October 2017 12:37  
**To:** [REDACTED]  
**Subject:** Publication of donations

Hi [REDACTED]

I need some relatively urgent legal advice please. If I could have a response by COP 13 October that would be handy.

The issue is quite difficult to explain in an email so a chat might be easier. I’ve summarised briefly the issue below.

1. Political parties report aggregated donations. These being donations that aggregate over £7,500 from the same source in a calendar year. At that point the threshold reduces to £1,500 if the same source continues to donate. This is best explained in the example:

The Party is given a regular contribution of £1,000 per month for the whole of 2017.

The £7,500 reporting threshold is exceeded in August. The Party must report all donations accepted up to August in their Q3 return. The Commission publishes all eight £1,000 donations – including the donations from before 1 July 2017. This is because those donations aggregate to over £7,500 with the other donations accepted in Q3.

Because a donation from the donor has been reported in Q3, the reporting threshold for further donations from the same donor falls to £1,500. This is exceeded in October and again in December. The Party reports the next two donations of £1,000 as accruing in October and a further two donations of £1,000 which become recordable in December, both in their Q4 return. The Commission publishes that quarter as usual.

2. It has become apparent that the Commission has advised parties to report donations from the same source differently. That is that once the £7,500 threshold is exceeded parties then report each £500 donation from that same source rather than when the donations exceed £1,500.
3. The issue I'd like clarification on is whether this over reporting has any implications for the register of donations? In other words does PPERA allow us to publish these individual donations of £500 before it reaches £1,500. Or is there a specific requirement which stipulates the Commission can only publish donations that have reached the relevant reporting threshold (i.e £1,500)?

Apologies if this isn't very clear – as I said a conversation may be needed.



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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 01 November 2017 10:00  
**To:** [REDACTED]  
**Subject:** FW: Meeting request from NIO

Do you want to go back to NIO and suggest Friday morning?

---

**From:** [REDACTED]  
**Sent:** 31 October 2017 17:07  
**To:** [REDACTED]  
**Subject:** RE: Meeting request from NIO

Hi [REDACTED]

All could make Thursday 1-3 pm or 9.30 am onwards on Friday morning.

A slot on Friday morning between 11am up to 1.30 pm (when Ann leaves) would be ideal as there's v/c availability. Otherwise, [REDACTED] will have to join via teleconference. (I've booked out the Martin Room for this time so we don't lose it meantime. )

Regards

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 31 October 2017 15:30  
**To:** [REDACTED]  
**Subject:** RE: Meeting request from NIO

Hi [REDACTED]

He's coming to our office. It was Kate that spoke to him. Can you check Commission staff availability Thur and Fri AM (I assume Ann is not working on Wednesday ) so we can see what we can offer him on those days?

Have to log off for a bit – computer problems again !

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 31 October 2017 15:04  
**To:** [REDACTED]  
**Subject:** RE: Meeting request from NIO

[REDACTED]

I've been setting up other meetings for Ann on Tuesday – so know that's now out for her too. So we'll be talking Wednesday, Thursday or Friday.

If you can let me know when [REDACTED] is not available on those 3 days, I can work around that. Is he attending the meeting in our office?

Regards

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 31 October 2017 14:51  
**To:** [REDACTED]  
**Subject:** Meeting request from NIO

Hi [REDACTED]

[REDACTED] from NIO has requested a meeting with the Commission. We need [REDACTED] to attend by V/C from London.

Essential attendees – Ann (or me if Ann doesn't have availability ) and [REDACTED]

Desirable attendees – [REDACTED]

I'm on leave Monday and Tue next week and Ann is on leave Monday – if that helps .

Can you please see if you can set up a meeting next week.

Give me a shout if this isn't clear.

Many thanks

[REDACTED]

[REDACTED]  
**Senior Officer (Political Parties Liaison)**

The Electoral Commission

Ground Floor

4 Cromac Place

The Gasworks

Belfast BT7 2JB

Tel: 028 9089 [REDACTED]

Fax: 028 90314827

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 15:25  
**To:** [REDACTED]  
**Subject:** FW: Web updates  
**Attachments:** NI update web.docx

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 11:31  
**To:** [REDACTED]  
**Subject:** Web updates

These are the pages that will need the update

[REDACTED]

Parties page

<https://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/guidance-for-political-parties>

NI parties page

<https://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/guidance-for-political-parties/reporting-donations-and-loans-northern-ireland>

Donation to other individuals

<https://www.electoralcommission.org.uk/find-information-by-subject/political-parties-campaigning-and-donations/donations-and-loans-to-other-individuals-and-organisations>

Regulated individuals

<https://www.electoralcommission.org.uk/find-information-by-subject/political-parties-campaigning-and-donations/donations-and-loans-to-other-individuals-and-organisations/guidance-for-regulated-individuals>

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 13:28  
**To:** Ann Watt  
**Subject:** FW: Media statement: Transparency of political finance in Northern Ireland

Ann

Please see below email from Lee Reynolds

[REDACTED]

---

**From:** Lee Reynolds [<mailto:LeeReynolds@dup.org.uk>]  
**Sent:** 23 November 2017 12:28  
**To:** [REDACTED]  
**Subject:** Re: Media statement: Transparency of political finance in Northern Ireland

[REDACTED]

The timing of this is politically dubious only two days before our party conference.

This seems to be developing into a pattern of behaviour by the Electoral Commission ie its release of information about the DUP during the Assembly campaign.

Lee

Sent from my iPhone

On 23 Nov 2017, at 09:34, [REDACTED] wrote:

For info - the Commission has issued the below statement this morning regarding the publication of political donations and loans in Northern Ireland.

Regards

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 09:31  
**To:** [REDACTED]  
**Subject:** Media statement: Transparency of political finance in Northern Ireland

## Media Statement

23 November 2017

Transparency of political finance in Northern Ireland

The Electoral Commission has today expressed its disappointment that it remains unable to publish the details of political donations and loans in Northern Ireland, because the UK Government has not yet made the necessary legislation.

In July the Secretary of State for Northern Ireland announced that he would bring forward legislation to enable the publication of donations and loans received by political parties in Northern Ireland from 1 July 2017.

The Electoral Commission had expected to publish the first set of data on donations to Northern Ireland political parties today, alongside the information on donations to political parties in Great Britain. However, it is unable to do so as the necessary legislation has not been made. Because of this the Commission continues to be prohibited from publishing any information relating to donations and loans received by political parties in Northern Ireland.

**In response to this, Ann Watt, Head of the Electoral Commission in Northern Ireland said:**

“We are extremely disappointed that we are unable to provide the public with the information they expected on how political parties in Northern Ireland are funded. The continuing secrecy only serves to undermine trust and confidence amongst the public in the democratic process.

We were consulted by the Northern Ireland Office several months ago on draft legislation and provided detailed comments. In our view the legislation is ready to be laid in Parliament now.

The Commission urges the UK Government to immediately bring forward this legislation to allow us to publish this information as soon as possible.”

## **Ends**

For further information please contact Cahir Hughes on 028 9089 4023 or [press@electoralcommission.org.uk](mailto:press@electoralcommission.org.uk) Out of office hours - 07789 920 414.

## **Notes to editors**

1. 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 by:
  - enabling the delivery of free and fair elections and referendums, focussing on the needs of electors and addressing the changing environment to ensure every vote remains secure and accessible
  - regulating political finance – taking proactive steps to increase transparency, ensure compliance and pursue breaches
  - using our expertise to make and advocate for changes to our democracy, aiming to improve fairness, transparency and efficiency

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 October 2017 14:39  
**To:** [REDACTED]  
**Subject:** FW: NI D and L - A few questions

---

**From:** [REDACTED]  
**Sent:** 20 October 2017 11:40  
**To:** [REDACTED]  
**Cc:** Ann Watt  
**Subject:** RE: NI D and L - A few questions

Hi [REDACTED]

### Forms

The forms already have the received dates as does PEF Online (these are mandatory). We've reminded parties of the importance of the received dates in our correspondence and will be doing so again when the Order is laid. We will also be reminding the parties/reg donees that we will issue disclosure notices should we believe the received dates aren't accurate or parties don't provide them.

### Reasonable belief/QMS

Subject of much discussion so far. These are action points with [REDACTED]. The implementation [table](#) provides more details on these actions. Best speak with [REDACTED] for further info.

Apologies this is a bit brief – I'm on holiday from today so trying to finish everything off before I go.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 20 October 2017 10:48  
**To:** [REDACTED]  
**Cc:** Ann Watt  
**Subject:** NI D and L - A few questions

Hi [REDACTED]

I'm trying to get up to speed on the NI D and L project and have a few questions that I was hoping you could help with. (Coming to you first in your capacity as project manager rather than go round the houses)

### Forms

I see in previous notes that [REDACTED] started working on amending forms etc. but he advises me that was passed on to someone else, perhaps [REDACTED]? – can you tell me who was given that work and what if anything was done on the forms or explanatory notes? Specifically were any amendments made in respect of emphasising the importance of the received date?

### Reasonable belief

I'm unclear about what has been decided in terms of how the Commission will be demonstrating / recording that it has reasonable belief regarding the received date on Q3 forms and the received date in subsequent quarters (albeit that the risk of inaccurate /incorrect received dates should recede after Q3 2017). I read [REDACTED] legal advice on this which suggests to me that we need to actively be confirming the received dates and recording this somewhere, as a defence, in the event that we publish something that we should not have.

There is a 'Reasonable belief' flow chart that [REDACTED] and [REDACTED] have prepared but this seems to pose the question is there any reason why we don't believe the received date put on the form or will we issue a disclosure notice to 'get the received date'. My reading of the legal advice is that it would be best practice for us to build in 'active' steps to confirm the received date for Q3 onwards into the QMS procedures. There also appeared to be some suggestion that we would check the received date / issue a disclosure notice in each case (but this may have changed in later discussions)?

### QMS- and process for handling NI D and L going forward

On a general note I wonder what has been agreed regarding amending/ reviewing QMS procedures. PEF 77 (NI donations and loans handling) was mentioned at the last meeting, but there are a number of related procedures and I wonder what has been agreed about reviewing these?

Has anything been agreed in relation to how future NI d and L reports will be processed as historically this was done in both London and Belfast depending on where the report was received but this was prior to PEF online being used for publication. For example as the duty to check permissibility of donors to NI recipients will continue (rather than the general monitoring compliance with PPERA duty in respect of GB recipients) we need to agree who does this and when (before /post publication) etc. Will future NI reports default to the 'GB' procedure – will we still run parallel systems – e.g. in case of a pre-July 2017 donation being reported late?

I hope this makes sense, please give me a call if it's not clear. Apologies in advance if I'm asking things that have already been agreed , as I said above I'm trying to get my head around what may previously have been discussed/agreed.

Thanks for your help.

Regards

[REDACTED]

[REDACTED]

**Senior Officer (Political Parties Liaison)**

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## Putting voters first

 Please consider the environment before printing this email.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 09:35  
**To:** [REDACTED]  
**Subject:** FW: Media statement: Transparency of political finance in Northern Ireland

For info - the Commission has issued the below statement this morning regarding the publication of political donations and loans in Northern Ireland.

Regards  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 09:31  
**To:** [REDACTED]  
**Subject:** Media statement: Transparency of political finance in Northern Ireland

The  
Electoral  
Commission

## Media Statement

23 November 2017

### Transparency of political finance in Northern Ireland

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The Commission urges the UK Government to immediately bring forward this legislation to allow us to publish this information as soon as possible.”

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  - regulating political finance – taking proactive steps to increase transparency, ensure compliance and pursue breaches
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## Senior Officer (Communications and Electoral Administration)

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 13 October 2017 17:22  
**To:** [REDACTED]  
**Subject:** FW: Ni Assembly - FAPP Scheme payments

[REDACTED]

Useful link below...

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 02 August 2017 15:40  
**To:** [REDACTED] Ann Watt  
**Subject:** RE: Ni Assembly - FAPP Scheme payments

[REDACTED]

Yes, agree that we don't need an e-mail update if it's online.  
And it's not an issue re: late publication. The only issue for us is whether the parties recorded the funds in the correct quarter.  
Thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 02 August 2017 15:15  
**To:** [REDACTED] Ann Watt  
**Subject:** FW: Ni Assembly - FAPP Scheme payments

Hi both

Please see below email from Assembly on Financial Assistance scheme. If this information is online then I don't see why they need to continue sending a separate spreadsheet to us as long as they continue to notify us when it's updated?

Not sure there is much we can do about later publication of earlier expenses but let me know if it's an issue?

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 02 August 2017 15:10  
**To:** [REDACTED]  
**Subject:** RE: Ni Assembly - FAPP Scheme payments

H [REDACTED]

Thanks for this. If you could send any future communication to me until [REDACTED] returns that would be great.

I'll discuss with colleagues internally about the queries you've raised and get back to you.

Thanks

[REDACTED]

**Senior Officer (Communications and Electoral Administration)**

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---

**From:** [REDACTED]  
**Sent:** 02 August 2017 15:00  
**To:** [REDACTED]  
**Subject:** FW: NI Assembly - FAPP Scheme payments

Good afternoon

I normally send the attached to [REDACTED], but I understand she is away. I am not sure if anyone else needs this information?

Regards

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 02 August 2017 14:51  
**To:** [REDACTED] <[\[REDACTED\]@electoralcommission.org.uk](mailto:[REDACTED]@electoralcommission.org.uk)> [REDACTED] <[\[REDACTED\]@electoralcommission.org.uk](mailto:[REDACTED]@electoralcommission.org.uk)>  
**Subject:** NI Assembly - FAPP Scheme payments

Good afternoon

Please find attached a spreadsheet detailing the Financial Assistance for Political Parties (FAPP) Scheme payments made in the first three months of this financial year.

We now publish this information on the NI Assembly website, so I was wondering if you still need the information sent to you or are you content to look at the website when you require the information?

The website is <http://www.niassembly.gov.uk/your-mlas/financial-support-to-members-and-political-parties/financial-assistance-for-political-parties-scheme/financial-assistance-for-political-parties-scheme/2016-2017/>

We have not yet published the expenses for the first three months of this year, but hope to do so in Sept. I appreciate this maybe too late for your purpose.

Regards

[REDACTED]



[REDACTED]  
AG6  
Members Finance

work: 028 905 [REDACTED]  
email: [REDACTED]@[niassembly.gov.uk](mailto:[REDACTED]@niassembly.gov.uk)

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---

Dear *[insert requester's name]*

**Our Ref: FOI 192/17**

Thank you for your email to the Electoral Commission dated **05 December 2017**.

The Commission aims to respond to requests for information promptly and **[has done so within the statutory timeframe of twenty working days/ regrets that on this occasion we have not done so]**.

Your request is in bold below followed by our response.

**Under Freedom of Information legislation please provide me with a copy of all documents held by the Electoral Commission during the months of September, October and November 2017 including letters, internal correspondence, reports, research, reviews, briefing documents, minutes of meetings, emails and memos that make reference to plans to implement legislation in Westminster lifting the ban on naming donors to political parties in Northern Ireland.**

**If this time period is too long to comply with cost and time exemptions, please provide me with the same information for the longest time period possible. For example, if three months is too long please provide me with the documents for October and November 2017. If this still breaches time and cost exemptions please provide me with the documents for the period of November 2017. If this is still too long please provide me with the longest time period possible starting backwards from Friday 24th November.**

Our response is as follows:

**We [hold/ do not hold][some of] the information you have requested.**

I trust that this information satisfies your request. The Commission strives to be an open, transparent authority, **but in some circumstances we cannot responsibly release requested information, and we ask for your understanding in this regard.**

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: <http://www.electoralcommission.org.uk/about-us/freedom-of-information-requests/how-do-i-make-an-foi-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,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 15 November 2017 11:11  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: NI D and L Handling procedure – PEF 77

Apologies [REDACTED]

I should have cced you into the email below.

FYI: the procedure at para 7.5 refers to cross references being included in the case assessment/investigations and sanctions procedures – so that any NI related casework is handled in accordance with PEF 77. I had a quick look at both PEF 20 and PEF 49 and at the minute there doesn't appear to be a cross reference – although in practice the enforcement team would work on the NI drive for NI confidential casework and follow the procedures set out in PEF 77 but I think we should formalise the cross reference. I think a line in each of the enforcement procedures would be sufficient.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 15 November 2017 10:45  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** NI D and L Handling procedure – PEF 77

All,

I've had a go at updating the NI D and L Handling procedure – PEF 77 to reflect changes that will be brought about as a result of the transparency order. I have referred to PEF 77a which will be the interim procedure covering processing of Q3,4 2017 returns (Which [REDACTED] are drafting). The two procedures will be interlinked at least for a transitional period (not sure how long that will be) but we can discuss that.

You can see the procedure here :

<http://skynet/dm/Functions/PEFpol/HMG/Confidential%20NI%20donations/Compliance/PEF77%20Handling%20NI%20Donation%20and%20Loan%20Returns%20-%20Nov%202017.doc>

Tracked changes in red. It would be helpful if you could look at the procedure and see if you are happy with the approach I have adopted.

[REDACTED]  
**Senior Officer (Political Parties Liaison)**

The Electoral Commission

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**Putting voters first**

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 17:02  
**To:** External Communications circulation group  
**Subject:** FW: Media statement: Transparency of political finance in Northern Ireland

Good evening

This afternoon the Transparency of Donations & Loans (Northern Ireland Political Parties) Order 2018 was laid before Parliament. This Order, when it comes into force will allow the Commission to start publishing information on donations and loans from political parties in Northern Ireland. We have issued the below statement to the media in Northern Ireland in response.

Earlier today we had expressed our disappointment that we were unable to publish this information today as we had originally envisaged.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 16:36  
**To:** [REDACTED]  
**Subject:** Media statement: Transparency of political finance in Northern Ireland

The  
Electoral  
Commission

## Media Statement

23 November 2017

### Transparency of political finance in Northern Ireland

In response to the announcement that the 'Transparency of Donations & Loans (Northern Ireland Political Parties) Order 2018' has now been laid in Parliament **Ann Watt, Head of the Electoral Commission in Northern Ireland said:**

"We are pleased that the UK Government has acted to make this important change a reality. Transparency in how our political parties are funded is key to ensuring public trust and confidence in the democratic process. We hope to be able to begin publishing this information early in the New Year."

**Ends**

For further information please contact Cahir Hughes on 028 9089 4023 or [press@electoralcommission.org.uk](mailto:press@electoralcommission.org.uk) Out of office hours - 07789 920 414.

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**From:** [REDACTED]  
**Sent:** 23 November 2017 09:44  
**To:** 'press@labour.org.uk'  
**Subject:** Latest figures for GB political party donations and loans borrowing published

Hi there,  
Our latest press release on political party donations and loans borrowing is about to be published. A copy is below, and the links will go live on our website shortly.  
Thanks and best wishes,  
[REDACTED]

## Press release

23 November 2017. 9.30am

# Latest figures for GB political party donations and loans borrowing published

Seven political parties registered in Great Britain reported accepting a total of more than £6 million in donations between 1 July and 30 September 2017 – the first quarterly reporting period after the UK Parliamentary general election - according to new figures published today.

This quarter saw around the same amount in reported donations when compared to the same quarter in 2016 (£6.5million). There was a steep decline compared to the previous quarter of 2017, which covered the UK Parliamentary general election and saw more than £40 million in donations reported.

The seven political parties to report donations accepted were:

Party	Total accepted in quarter 3 2017
Conservative and Unionist Party	£3,701,470
Co-operative Party	£30,000
Green Party	£26,550
Labour Party	£1,739,580
Liberal Democrats	£610,444
Scottish National Party (SNP)	£44,039
UK Independence Party (UKIP)	£35,640
<b>Total</b>	<b>£6,187,723</b>

In addition to these donations, during the third quarter of 2017 five parties accepted a total of more than £3.3 million from public funds – money and assistance allocated to parliamentary opposition parties to assist with costs.

The value of outstanding loans to political parties as of 30 September 2017 stood at £4,151,868, which is a decrease of £59,240 compared to the end of the second quarter of 2017.

Ten parties failed to meet the deadline for reporting for this quarter. The Commission will consider each of these matters in line with its enforcement policy, which is available to view [here](#).

## **Northern Ireland**

In July this year the Secretary of State for Northern Ireland announced legislation would be brought forward to enable the publication of donations and loans received by political parties in Northern Ireland from 1 July 2017.

The Electoral Commission had expected to publish the first set of this data as part of today's publication; however, the legislation has not been made and the Commission continues to be prohibited from publishing this information.

**Bob Posner, Director of Political Finance and Regulation & Legal Counsel at the Electoral Commission said:**

"This data is hugely important in ensuring that our political finance system is as transparent as possible across the whole of the UK. We are extremely disappointed that we are unable to provide the public with the information they expected on how political parties in Northern Ireland are funded. The continuing secrecy only serves to undermine trust and confidence amongst the public in the democratic process.

"The Commission urges the UK Government without delay to bring forward the legislation that it has already announced, for parliament to approve. This would allow us to publish donations and loans to Northern Ireland parties as soon as possible."

### **Further information**

A summary of donations reported in the third quarter of 2017, including the highest donors, is available [here](#).

Full details of donations and loans are available on our registers [here](#).

Full analysis and breakdown of the figures for quarter three 2017 is available on our website [here](#).

Full statement on transparency in Northern Ireland can be found [here](#).

### **Ends:**

For further information please the Electoral Commission press office on 020 7271 0704 or email [press@electoralcommission.org.uk](mailto:press@electoralcommission.org.uk).

For further information on transparency in Northern Ireland please contact Cahir Hughes on 028 9089 4023.

For out of hours queries, please call 07789 920 414.

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The Commission was set up in 2000 and reports to the UK and Scottish Parliaments.

2. The Political Parties, Elections and Referendums Act 2000 (PPERA) requires registered parties to report cash and non-cash donations and borrowing to the Electoral Commission on a quarterly basis. Political parties must report all donations and borrowing over £7,500 relating to the central party, or over £1,500 relating to an accounting unit. This includes aggregates of donations and loans from the same source during the calendar year.

3. As the parties only report donations and loans over these thresholds, the figures do not include all donations and loans to political parties. Donations and loans under these thresholds are recorded in political parties' annual Statements of Accounts. To view these accounts, visit our register [here](#).

4. Public funds are donations from the House of Commons, the House of Lords, the Scottish Parliament and the Electoral Commission. 'Short' and 'Cranborne' grants are available to parties in opposition in the House of Commons or House of Lords respectively.

5. Some donations appear on the register as being from the Electoral Commission. These are Policy Development Grants, which were established by the Political Parties, Elections and Referendums Act 2000 for parties represented in the Commons by two or more sitting members. The grants are intended to assist parties in developing the policies that they will present in an election manifesto. The legislation provides the total sum of £2 million annually for this purpose. Policy Development Grants became reportable as donations for the first time in quarter three of 2006 as a result of the Electoral Administration Act 2006.

6. There were 364 registered political parties in Great Britain during this quarter, 59 of which were required to submit their quarterly donation returns and 52 to submit borrowing information within the deadline. The remaining political parties were exempt (unless they received donations) because they have previously submitted four consecutive nil returns.

**Senior Communications Officer (Media relations)**

The Electoral Commission

3 Bunhill Row

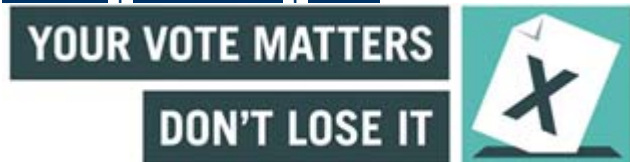
London EC1Y 8YZ

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To: Treasurers of Northern Ireland Political Parties  
and MPs/MLAs

By email

24 November 2017

## **Changes to the transparency of donations and loans to political parties and regulated donees in Northern Ireland**

The Transparency of Donations and Loans etc. (Northern Ireland Political Parties) Order 2018 was laid before the UK Parliament on 23 November 2017.

Under the Political Parties Elections and Referendums Act 2000 (PPERA), it is currently unlawful for the Electoral Commission to disclose any information reported to us about donations and loans made to Northern Ireland parties and regulated donees.

Once the new legislation is passed, details of reportable donations received and loans entered into by parties and regulated donees (members of political parties, members associations, and holders of elective office such as MPs, MEPs, MLAs and councillors) from 1 July 2017 will be published on our website. We expect to start publishing details of donations and loans to parties and regulated donees when the law comes into force.

To help you understand the changes to the rules, we have published a factsheet providing more information which you can find [here](#).

The requirements on what political parties and regulated donees must report to the Electoral Commission will remain the same in most cases. The changes are primarily to what the Commission is required to publish.

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

## **Changes that affect your reporting obligations**

The new rules will apply from 1 July 2017. In practice this means that information about some donations or loans relating to the period between 1 January and 30 June 2017 may also be published because of the aggregation rules.

It is therefore important that parties and regulated donees provided the “received dates” for all relevant donations and the “entered into” dates for all loans or changes to loans (including the date the changes took effect) reported in the Quarter 3 (July to September) return. The same applies for the Quarter 4 (October – December) return due to be reported in January 2018.

These dates will be used to determine whether information can be published, meaning that without them the Commission may not be able to publish them. We may write to parties and regulated donees at a later date to confirm the accuracy of these dates included in the Quarter 3 and Quarter 4 returns. If appropriate and proportionate at the time, we may also exercise our powers under Schedule 19B paragraph 1 of PPERA to compel the provision of these dates.

## **Changes that allow the Electoral Commission to begin to publish information about Northern Ireland donations and loans**

We would encourage you to familiarise yourself with how the changes will allow the Electoral Commission to publish information about donations and loans, so that you can inform your donors and party members. The appendix to the factsheet provides some useful working examples of how the rules will work in practice. It also includes a table showing what will or will not be published if a donor has made a series of donations during 2017 that are covered by the rules on “aggregation” above the reporting thresholds.

## **Next steps**

You should ensure that you have submitted the “received” and “entered into” dates for any donations and loans that were reported in Quarter 3 return and due to be reported in the Quarter 4 return. Please use our paper forms to report your donations and loans available on our [website](#). We are currently working towards updating PFR Online to allow online reporting and will provide more details on how to do this in 2018.

It would be helpful if you could contact your party members so they are aware of the rules as regulated donees and ask them to contact us should they have any questions.

Parties and regulated donees may wish to inform anyone who has donated and/or lends money over the relevant thresholds from 1 July 2017 about these changes. It means that the names of donors and lenders of amounts over the relevant thresholds will be published in the online register on the Electoral Commission's website, in the same way as in Great Britain.

We will publish amended guidance once the law has changed. You should check our website regularly for further updates. In the meantime, if you have any questions then please contact us at [infonorthernireland@electoralcommission.org.uk](mailto:infonorthernireland@electoralcommission.org.uk).

Yours sincerely

A black rectangular box redacting the signature of Ann Watt.

**Ann Watt**  
**Head of Electoral Commission, Northern Ireland**  
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4 Cromac Place  
The Gasworks, Belfast, BT7 2JB  
Tel: 0333 103 1928  
[infonorthernireland@electoralcommission.org.uk](mailto:infonorthernireland@electoralcommission.org.uk)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 27 November 2017 11:26  
**To:** [REDACTED]  
**Subject:** In the News - Monday 27 November 2017

Hey, sorry – that took longer than expected. Just checking below is all okay to go out? Thanks,  
[REDACTED]

## Vote Leave investigation

Caroline Cadwalladr of the **Guardian** and **Observer** reported on the Vote Leave investigation in two articles over the weekend.

In the [Guardian](#), Cadwalladr reports on the “mystery letter” which Dominic Cummings “had told people that the Electoral Commission had given Vote Leave permission to donate to other campaigns – and it had it in writing.” The article details the FOI requests Cadwalladr made to the Commission in relation to correspondents with Vote Leave, and the conclusion that the Commission “can’t find any record of any exchange with us on the subject of donations between them from that period”. It goes on to detail Cummings’s background and the role of social media stating “Cummings writes that 98% of its budget went online on ads that received nearly a billion impressions. This was where the battle for Brexit was won: on the internet.” Finally, it concludes asking questions about their “dark ads”, their expense returns and “what does May know?”

In the **Observer** [print only, page 1 and 8] Cadwalladr reported Vote Leave faces fresh questions over payments it made during the EU referendum. The article states “the Electoral Commission has denied a claim by Vote Leave’s chief strategist, Dominic Cummings, that it had given them ‘a letter of permission’ to make the donations”. Stephen Kinnock MP is also report in the article as saying “the Electoral Commission really needs to lay it’s facts on the table. Is Dominic Cummings correct? Was there a letter? Was some sort of deal made? The British public really does deserve to be told.” Commission guidance is also reference in the article.

**BBC News** and **Talk Radio** also reported on Cadwalladr’s front page story.

The on duty press officer spoke with Henry Mance, political correspondent for the **Financial Times**, over the weekend, answering questions regarding Vote Leve funding. In an article published last night, and appearing on page 3 of the paper today, Mance wrote that highly-partisan campaigns and targeted social media advertising have created a different challenge for the Commission. The UK’s rules on elections and referendums were designed for billboards and leaflets, not social media: printed ads have to disclose who paid for them, but online equivalents do not.

Before the referendum, Steve Baker, a Conservative MP who was a leading member of Vote Leave and is now a Brexit Minister, said the rules meant that “Vote Leave will be able to spend as much money as is necessary to win the referendum”. Vote Leave says it did not act in concert with Mr Grimes and Veterans for Britain. Mance writes of “several points [that] suggest at least that their thinking was aligned” including Mr Grimes backing Vote Leave’s application to be designated as the official campaign for Brexit. He spent Vote Leave’s £625,000 donation with Canada-based AggregateIQ, Vote Leave’s preferred digital ad provider (the money was paid directly from Vote Leave to AggregateIQ). Published documents show Mr Grimes was able to commission

advertising from AggregateIQ before Vote Leave had confirmed in writing how much it would donate to him on two occasions, and on a third within 22 minutes of it doing so.

## Russian interference

Nick Robinson wrote in the **Mail on Sunday** [print only, page 27] about alleged Russian interference and calls on “all-powerful and all too often unaccountable social media companies” to address this. Robinson states that “Russia is deploying information in the way it once deployed tanks and missiles. Its aim is to weaken its traditional enemies and old alliances – Nato, the US, the EU and yes, the UK.” The article notes how Russian interference isn’t just about political or global power by “can affect the way we live our lives day to day” with fake news. It continues to detail how Russia is apparently using Facebook and Twitter, Russia Today and notes the Commission inquiry into Vote Leave.

The [Express](#) also reported over the weekend that Donald Tusk “twists May’s words to suggest Russian interfered in Brexit referendum.” Mr Tusk is reported saying at a press conference that “one of the biggest problems today is the real threat when it comes to cyber attacks fake news hybrid war etc”, continuing “today we witness in the free world on both sides of the Atlantic some consequences of interventions,” and referred to May’s speech at Mansion House. The article quotes Bob Posner speaking to the Times, saying “we are asking questions of Facebook and Twitter and this work is ongoing. We don’t just sit back and see what lands on our doorstep.”

## Scotland

The **Sunday Herald** [print only, page 13] reported yesterday that the “Scottish Tories have been accused of ‘shameless’ hypocrisy over their support for the environment”, following a donation from a climate change sceptic. The article reports the donation is of £2,000 from Global Warming Policy Foundations to John Lamont MP. It comes as Ruth Davidson, whom Lamont helped elect as party leader by running her campaign, will speak at the Green Energy Awards this week.

## Gemma Thomas

Several papers in East Anglia, including the [Ipswich Star](#) has reported the sad passing of Gemma Thomas, wife of TV presenter Simon Thomas and a former press officer at the Electoral Commission. The Sky Sports presenter and former Blue Peter presenter said he was “crushed with indescribable pain” after Gemma died just three days after falling ill with acute myeloid leukaemia.

## Northern Ireland transparency

[Open Democracy](#) has stated that “precise details behind a controversial £435,000 donation to Northern Ireland’s Democratic Unionist Party will continue to be protected in law,” following the order being laid last week. The article notes that “the new law will only cover funding received on or after July 2017.” It notes so called “dark money” saying a “donation to the DUP in 2016 was made by a Glasgow-based organisation called the Constitutional Research Council (CRC). The money, a record donation and far larger than any previous DUP campaign, was used throughout the UK as part of the Brexit campaign.”

## For interest

[Reuters](#) reports on the Nepalese elections which took place yesterday , which will “choose a new parliament and seven state assemblies more than a decade after the end of a civil war.” It notes that these elections are two-phase, and “the first in Nepal since it turned into a federal republic and abolished monarchy in 2008.” The article has a timeline from 2008 detailing it’s road to democracy.

## On this Day

### [Today's front pages.](#)

**1967** – French President, Charles de Gaulle says he will veto Britain’s application to join the Common Market for a second time.

**1990** – John Major wins the Conservatives’ leadership elections, becoming Britain’s new prime minister.

**2000** – Ten year old Damilola Taylor dies after being stabbed by a gang near his home.

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 21 November 2017 13:08  
**To:** [REDACTED] nio.gov.uk'  
**Cc:** [REDACTED] nio.gov.uk)  
**Subject:** Letter from Chair of the Electoral Commission  
**Attachments:** HolmesJ-to-BrokenshireJ-12017-11-21-NI Donations Loans.pdf

Dear Secretary of State

Please find attached letter from Sir John Holmes, Chair of the Electoral Commission, regarding the publication of donations to political parties in Northern Ireland.

Regards

[REDACTED]

**Senior Officer (Communications and Electoral Administration)**

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[REDACTED]

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**From:** Ann Watt [REDACTED]  
**Sent:** 24 October 2017 14:18  
**To:** [REDACTED]  
**Subject:** Legislation

Hi [REDACTED] we heard from NIO. Does not look like legislation will be laid this week. So still not clear when we will need to send the letter.

Ann

Sent from my iPhone

To: All Party Treasurers  
Northern Ireland Registered Political Parties

By email

29 August 2017

Dear Party Treasurer

**Changes to the transparency of donations and loans to political parties and regulated donees in Northern Ireland**

Following the Secretary of State for Northern Ireland's announcement on 3 July, the Commission anticipates the Transparency of Donations and Loans etc. (Northern Ireland Political Parties) Order 2017 being laid before the UK Parliament in September.

If it gets Parliamentary approval, it will change the rules on confidentiality of donations and loans to Northern Ireland political parties and regulated donees (members of political parties, members associations, and holders of elective office such as MPs, MEPs, MLAs and councillors).

The changes will allow the Electoral Commission to publish details of donations received and loans entered into by Northern Ireland parties and regulated donees. The new transparency rules are proposed to apply from 1 July 2017.

The requirements on what political parties and regulated donees must report to the Electoral Commission will remain essentially the same. The changes are primarily to what the Commission is required to publish. Going forward, the Commission will

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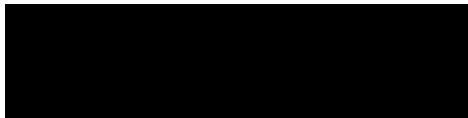
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publish information about donations and loans in Northern Ireland in essentially the same way as we do for donations and loans in Great Britain.

We expect to publish the first set of data in November or December. This will be the returns from political parties for Quarter 3 (July to September) of 2017, and any reports made by regulated donees about donations or loans from that same time period.

We will publish a factsheet providing more detail about the changes once the Order has been laid. In the meantime, if you have any queries or issues that you would like to be addressed in the factsheet, please contact us at [pef@electoralcommission.org.uk](mailto:pef@electoralcommission.org.uk).

Yours sincerely



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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 21 November 2017 11:02  
**To:** [REDACTED]@nio.gov.uk  
**Subject:** Letter to Secretary of State

Hi [REDACTED]

Just to give you the heads up we're sending a letter to the Secretary of State today regarding the delay in donations legislation. Hard copy will go in the post but can you let me know what would be the best email address to also send a copy of the letter to. I'll also copy you in.

Also I wanted to confirm with you that we will be issuing a media statement in NI on Thursday on this issue. This is when we will be publishing the GB Q3 returns. I'll send you an advance copy of this tomorrow.

[REDACTED]

[REDACTED]

**Senior Officer (Communications and Electoral Administration)**

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 08 September 2017 14:17  
**To:** [REDACTED]  
**Subject:** Link for NI factsheet

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi [REDACTED]

In case you need it, this is the link to the NI factsheet.

[http://www.electoralcommission.org.uk/\\_data/assets/pdf\\_file/0003/233688/NI-Donations-and-Loans-2017-Factsheet.pdf](http://www.electoralcommission.org.uk/_data/assets/pdf_file/0003/233688/NI-Donations-and-Loans-2017-Factsheet.pdf)

It is live and a dummy is loaded, although it does not yet appear on the website. I am not sure if you still need it for Monday.

[REDACTED]

**Senior Advisor (Guidance)**  
**Party and Election Finance**  
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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 05 October 2017 11:52  
**To:** [REDACTED]  
**Subject:** Media handling of Transparency Order

Hi [REDACTED]

Hope you are well.

I understand from [REDACTED] that the NIO is planning to issue a press release once the Order has been laid. We plan to do the same to welcome the Order and also repeat our call for legislation to be also introduced for information from January 2014. It'll be pretty much consistent with what we have said since July. Happy to share with you in advance and would be useful to coordinate timings if possible?

[REDACTED]

[REDACTED]

**Senior Officer (Communications and Electoral Administration)**

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 09:25  
**To:** [REDACTED]  
**Subject:** Media statement - NI donations and loans Q3  
**Attachments:** Media statement - NI donations and loans Q3.docx

Hi [REDACTED]

Attached is copy of press release we are issuing shortly. As mentioned by [REDACTED] yesterday if there are further developments today we will issue another statement.

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 13:20  
**To:** [REDACTED] Ben Wilkinson; Press; Claire Bassett; Ailsa Irvine; Bob Posner; Louise Edwards; [REDACTED]  
**Cc:** Ann Watt; [REDACTED]  
**Subject:** Media coverage today

All

Just to update you that our statement on donations in Northern Ireland has dominated the news headlines here this morning. Ann has done a number of media interviews for TV, radio and press. Some of the coverage so far:

<http://www.irishnews.com/news/northernirelandnews/2017/11/23/news/delay-in-revealing-political-donors-in-north-disappointing--1195024/>

<https://www.belfasttelegraph.co.uk/news/northern-ireland/failure-to-lift-political-donors-anonymity-attacked-by-electoral-commission-36346548.html>

<http://www.newsletter.co.uk/news/delay-in-revealing-political-donors-in-northern-ireland-disappointing-1-8258994>

<http://www.thedetail.tv/articles/uk-government-criticised-over-delay-in-ending-ni-s-donor-secrecy-laws>

Worth noting that Ann was also part of a debate on Radio Ulster which included the leaders of the Alliance Party and the Green Party. I'll send a link when its online.

I understand that the NIO have already told some journalists that the Order will be laid this afternoon but as of yet there has been no official announcement from the NIO or the Secretary of State.

[REDACTED]

[REDACTED]

**Senior Officer (Communications and Electoral Administration)**

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**From:**  
**Sent:**  
**To:**  
**Subject:**

23 November 2017 09:31

Media statement: Transparency of political finance in Northern Ireland



## Media Statement

23 November 2017

### Transparency of political finance in Northern Ireland

The Electoral Commission has today expressed its disappointment that it remains unable to publish the details of political donations and loans in Northern Ireland, because the UK Government has not yet made the necessary legislation.

In July the Secretary of State for Northern Ireland announced that he would bring forward legislation to enable the publication of donations and loans received by political parties in Northern Ireland from 1 July 2017.

The Electoral Commission had expected to publish the first set of data on donations to Northern Ireland political parties today, alongside the information on donations to political parties in Great Britain. However, it is unable to do so as the necessary legislation has not been made. Because of this the Commission continues to be prohibited from publishing any information relating to donations and loans received by political parties in Northern Ireland.

**In response to this, Ann Watt, Head of the Electoral Commission in Northern Ireland said:**

"We are extremely disappointed that we are unable to provide the public with the information they expected on how political parties in Northern Ireland are funded. The continuing secrecy only serves to undermine trust and confidence amongst the public in the democratic process.

We were consulted by the Northern Ireland Office several months ago on draft legislation and provided detailed comments. In our view the legislation is ready to be laid in Parliament now.

The Commission urges the UK Government to immediately bring forward this legislation to allow us to publish this information as soon as possible."

**Ends**


For further information please contact [redacted] on 028 9089 [redacted] or  
[press@electoralcommission.org.uk](mailto:press@electoralcommission.org.uk) Out of office hours - 07789 920 414.

## Notes to editors

1. 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 by:
  - enabling the delivery of free and fair elections and referendums, focussing on the needs of electors and addressing the changing environment to ensure every vote remains secure and accessible
  - regulating political finance – taking proactive steps to increase transparency, ensure compliance and pursue breaches
  - using our expertise to make and advocate for changes to our democracy, aiming to improve fairness, transparency and efficiency



### Senior Officer (Communications and Electoral Administration)

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 31 August 2017 13:18  
**To:** [REDACTED]  
**Cc:** Ann Watt  
**Subject:** Media statements and coordination with NIO - transparency Order

Hi [REDACTED] – NIO are saying that the Order might now be laid w/c 11 September (instead of next week). [REDACTED] is going to send an email update later with details.  
It might be worth us having a quick chat next week about how you're going to coordinate our statement with NIO's and having that ready. I assume any statement we make will be similar to those we've already issued? I also understand NIO want to link to our new factsheet when they make their statement but there's a few bits to synchronise before that happens.

Ann – I'll brief you very quickly at 2pm.

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**Democracy matters**



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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 16 November 2017 12:31  
**To:** [REDACTED] Louise Edwards  
**Cc:** [REDACTED] Ann Watt  
**Subject:** NI D and L Action point - for this afternoons meeting

Hi All,

I'm unable to access the link to action points list for this afternoon's meeting and I want to raise an issue.

We will be writing to parties asking them to give us a breakdown of the individual donations that make up payments under the NI A – Financial assistance to Political Parties Scheme (FAPPS). The letter will also point out that going forward they will need to provide a breakdown of individual payments included in any aggregated amount they are reporting.

FAPPS is paid to parties in two main ways – Salaries – paid 3<sup>rd</sup> last working day of the month (I would expect each of these payments to be over £500) and ad hoc payments – for example to cover mobile phone bills, pay for constituency newsletters – each of these amounts is most likely well below £500.

My question is whether legally any of the smaller donations (

This is a question that I expect will come back to us once we send letters to parties so we will need to have any answer.

I wonder has the Commission received advice on this before?

[REDACTED]

[REDACTED]  
**Senior Officer (Political Parties Liaison)**

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 04 September 2017 10:59  
**To:** [REDACTED]  
**Cc:** Louise Edwards  
**Subject:** NI donation and loan implementation

Hi [REDACTED]

Wondered if you had an update on the actions against PEF Online?

PEF Online	Confirm whether PEF Online needs updating by making the received date a mandatory field for parties and reg donees.  Need to confirm with Jo-Crofton Diggins ASAP if changes are required and how this will be implemented.	[REDACTED]
------------	---	------------

It would also be helpful if you can let me know who is leading from your side on the implementation. I think you mentioned [REDACTED] last week, so happy to start copying him in once you've confirmed.

[REDACTED]

## Northern Ireland Assembly Parties' Panel

Tuesday 3 October 2017 at 9.30am in the Zinc Room

Radisson Blu Hotel, the Gasworks, Belfast, BT7 2JB

### Agenda

#### 1 Welcome and introductions

Welcome [REDACTED] to the meeting and do introductions around the table.

#### 2 Notes of previous meeting held on 19 June 2017

- Minutes of the last meeting
- Matters arising – see below:

##### a) Review of deadline for co-option to the NI Assembly.

Previously parties had complained that the seven day deadline for co-opting new members was too short. (The deadline is 28 days for council members, which parties say is more appropriate.)

[REDACTED] will give an update. She has made the Northern Ireland Office aware of the issue. Changing the deadline requires legislation.

##### b) Commission policy on appointment of Deputy Nominating Officer

At the June meeting, a party asked whether they could appoint a deputy nominating officer, since at UKPGE their nominating officer was out of the country which created problems with signing nomination papers.

Our advice is that a party can appoint a deputy nominating officer who signs the nomination forms on behalf of their nominating officer. It is a matter for the party to have an arrangement between their nominating officer and the person appointed as a deputy for signing the nomination forms. The Electoral Commission does not require that the nominating officer authorises in writing the appointment of someone on their behalf; the party should satisfy itself that it has an arrangement in place for a nomination form to be authorised.

#### 3 Issues raised by political parties in advance of the meeting

None      received

## **4 Commission reports on UK Parliamentary General Election**

The Commission is taking a new approach to reports for the UK Parliamentary General Election. Instead of one long report, we are publishing shorter thematic reports on different issues. Note these reports cover the UK as a whole, but will include Northern Ireland issues where appropriate:

Electoral registration at UKPGE (published on 17 July): this report recommended a number of steps to ensure the register is kept as up to date as possible, including more automatic registration and better data-sharing with other public services. It also repeated our call for online registration to be introduced in Northern Ireland.

Voter experience of polls (10 October): this report will repeat our recommendation that online registration should be introduced in Northern Ireland.

Administration of the poll (30 October): this report will include comment on the allegations of electoral fraud made at the time of the election. (Note this issue is on the agenda later – see Chief Electoral Officer item).

Candidate experience of polls (6 November)

Voters with disabilities experience of polls (14 November)

Commentary on party finance and regulation issues (16 November)

Campaign spending returns (date TBC)

Allegations of electoral fraud (date TBC)

## **5 First publication of donation and loans returns**

On 3 July, the Secretary of State for Northern Ireland announced that in future information about donations and loans to NI parties would be made public. This will apply to donations and loans accepted from 1 July 2017 onwards. In practice this means that the donations and loan information received for 2017Q3 (July to September) will be published.

The Electoral Commission welcomed this announcement as we have long campaigned for transparency in order to increase confidence in the political system. We also said that we would like to see transparency back-dated to January 2014, as was envisaged in the primary legislation passed at that time.

We have been working with the Government on the secondary legislation needed to enable transparency. We expect the legislation to be laid in Parliament early in October. Once passed, the Electoral Commission will be able to publish the donation and loan information provided to us by political parties and regulated donees.

We expect the first publication of donations and loans data (for 2017Q3) to be later this year. Timing will depend on when the legislation is passed.

Parties should submit their donation and loan returns to the Electoral Commission as previously. The only main difference from the previous regime is that this information will now be published. The deadline for submission of returns for 2017Q3 is 30 October.

We are aware that parties may have questions about how transparency will work in practice. Once the enabling legislation is laid in Parliament, we will publish guidance on the new framework, which we will send to all parties, MPs and MLAs. We are also available to answer any questions parties or regulated donees may have.

## **6 Electoral Commission modernisation projects**

The Electoral Commission is doing two UK-wide projects to improve the service we provide to stakeholders. The first project aims to make our guidance quicker and easier to use, and will modernise all the guidance we provide for parties, candidates, campaigners and electoral administrators. The other project is the re-development of PEF Online, the online system parties and campaigners use to submit statutory returns to us.

As users of the Commission's guidance and of PEF Online, we would welcome the view of the parties on both these projects. Attendees have been sent a paper on each project in advance of the meeting.

The Project Manager [REDACTED] will introduce each project. Afterwards please encourage the parties to give us their views.

- Delivering modern guidance
- Re-development of PEF Online

## **7 Update from Chief Electoral Officer for Northern Ireland**

- Online registration

[REDACTED] will say that online registration is due to be launched in November. This will be a 'soft launch' with only a small amount of PR. The Commission will not be funding a public awareness campaign since our research shows that campaigns outside of election periods do not provide value for money.

- Absent votes

[REDACTED] has reviewed the administration of the absent votes regime following the allegations of fraud widely covered in the media around the time of UKPGE. [REDACTED] will outline steps she is taking to ensure the integrity of the system.

## **8 Political finance - statutory return deadlines**

30 October – 2017Q3 donation and loan returns

## 9 AOB

### 10 2018 meeting dates

Suggested dates for 2018 (NB we need to check [REDACTED] can make these)

	30 January (Board 24/1)
	10 April (Easter 30/3 & 2/4) NB Ailsa's in Belfast
19	June (Board 27/6)
16	Oct (Board 23/10)

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 31 October 2017 16:11  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** NI Donations letter - confirming dates etc.

Hi [REDACTED]

I've come to the conclusion that I will amend the letter as follows:

Page 1 : the changes and the importance of received and accepted dates – general template that can be tweaked – essentially the general information we will provide to all the parties about the new legislation(as contained in the template) . It can also set out the importance of providing the information in the required format going forward.

Page 2: This will detail the information they provided to us – ie what's wrong with it /missing /what needs clarification .

Page 3 : A Table setting out the information we need from them with the declaration we discussed at the bottom to sign.

I'll have a go at a further draft tomorrow .

Regards

[REDACTED]  
**Senior Officer (Political Parties Liaison)**

The Electoral Commission  
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**Putting voters first**

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 19 October 2017 10:59  
**To:** [REDACTED]  
**Subject:** NI guidance for when Order is MADE

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi [REDACTED]

Here are links to the stuff we'll need when the Order is made.

Includes website updates you've not seen yet.

NI Parties Overview of Donations – PDFed:

<http://skynet/dm/Functions/PEFpol/Election%20Events%202016/Generic%20Parties%20NI%20Overview%20donations%20NI.pdf>

and here is the Word version in case you need it for some sad reason:

<http://skynet/dm/Functions/PEFpol/Election%20Events%202016/Generic%20Parties%20NI%20Overview%20donations%20NI.docx>

NI Reg Donees, which has been updated after our conversation on Wednesday, but it still has the comments/track changes:

<http://skynet/dm/Functions/PEFpol/Election%20Events%202016/Generic%20Reg%20Donee%20NI.docx>

Website text for when the Order is made, for Parties and Reg Donees:

<http://skynet/dm/Functions/PEFpol/Election%20Events%202016/Website%20text%20for%20when%20the%20NI%20transparency%20Order%20is%20made.docx>

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 September 2017 14:55  
**To:** [REDACTED]  
**Cc:** Louise Edwards  
**Subject:** NI internal implementation

Hi [REDACTED]

The following action is scheduled to be completed by tomorrow.

Audit of Q1 and Q2	Audit check of Q1 and Q2 donation and loan reports	[REDACTED]
--------------------	---	------------

Can you update me as to progress please?

Thanks

[REDACTED]  
**Party Finance Guidance Manager**  
**Electoral Administration and Guidance**  
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**Democracy matters**

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**From:** [REDACTED]  
**Sent:** 19 October 2017 10:30  
**To:** [REDACTED]  
**Subject:** NI transparency - if the Order is laid  
**Attachments:** NI update web.docx; MPs and MLAs emails 2017.xlsx; Copy of Email addresses of Northern Ireland Treasurers.xlsx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi [REDACTED]

Here's everything you will need if the Order is laid next week.

[REDACTED] should be able to give you some advance notice of when the Order will be laid. Worth checking with her on Monday.

If you know the date you may want to set everything up in advance rather than doing it on the day but I'll leave that to you.

If the Order is laid:

1. The [factsheet](#) will need to be published on the NI parties and reg donees page.  
It needs the date the Order is laid inserted on the first page. I've flagged this for you. It can then be PDF'd and published.  
There was a query about aggregation of donations and whether the table in the factsheet needed to be removed/changed. I've had that legal advice back now and the table is correct (I've confirmed this to Ann/Louise and [REDACTED] – I mention this only in passing just in case someone queries this ([REDACTED] has the details)
2. You have already kindly created the website [link](#) for the factsheet.
3. Speak to [REDACTED] about timings in terms of our media statement.  
I know NIO want to link to our factsheet in their media statement, so it'll need to be live before their media statement is released. Check with [REDACTED] that the language NIO use in their statement refers to us as an independent regulator who has produced the factsheet. Ann is conscious that we don't want people to think NIO has produced the factsheet.
4. The website will need to be updated – the agreed update is attached.  
This needs to go on the landing page for NI parties and reg donees.  
It also needs links and dates inserting - I've flagged them for you.
5. We then need to send this [letter](#) to the NI party treasurers and NI regulated donees informing them of the changes to the rules.  
This doesn't have to be done on the day the Order is laid – a couple of days after will be absolutely fine.  
The letter has been approved.

I've attached spreadsheets which include up to date emails of the party treasures in NI and the MPs/MLAs in NI.

The letter needs links and dates adding - I've flagged them for you.

The letter will need slightly tweaking for reg donees (title) so might be worth creating a separate letter for them so [REDACTED] doesn't get confused – apologies, I didn't get time to do this.

Speak to Ann about who is sending this. She was going to ask [REDACTED] in the NI office to do this and get back to me – [REDACTED] has done it before so knows the drill. **Whoever does it, it's really important to remind them that the emails all need to go in the BCC box (especially important for the party treasurer emails).**

6. The table of internal implementation action points is [here](#) – this is worth a look at some point if you're interested – there's nothing in here for you to action.

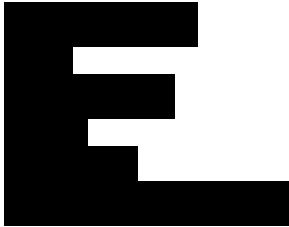
Thanks for this and hope it makes sense – if you need me then call me on my mobile.

[REDACTED]

Draft

## Northern Ireland Assembly's Parties Panel 3 October 2017 – Radisson Blu Hotel, Belfast at 9.30 am

Present:



The Electoral Commission

Anna Carragher, Commissioner  
Ann Watt, Head of Electoral Commission, Northern Ireland  
[Redacted] Guidance and Strategy Leader  
[Redacted] Senior Officer (Communications and  
Electoral Administration)  
[Redacted] Senior Officer (Political Parties  
Liaison)  
[Redacted] Business Support Officer

Electoral Office for  
Northern Ireland

[Redacted] Chief Electoral Officer for Northern  
Ireland  
[Redacted] Asst Chief Electoral Officer  
(Registration)

### 1 Welcome and introductions

- 1.1 The Chair, Anna Carragher, welcomed everyone to the meeting and introduced [Redacted] to the Panel.

### 2 Notes of previous meeting on 19 June 2017

- 2.1 The Panel agreed the notes of the previous meeting.

#### Matters arising

- 2.2 Previously, parties had complained that the seven day deadline for co-opting new members to the Northern Ireland Assembly was too short. The Chief Electoral Officer for Northern Ireland (CEO) had discussed this with the Northern Ireland Office (NIO) and this issue had been added to the NIO list for consideration for possible future legislation.

- 2.3 At the June Panel meeting, a party had asked whether they could appoint a deputy nominating officer, since at the UK Parliamentary General Election their nominating officer was out of the country and this had created problems with signing nomination papers.

The Commission's advice was that a party can appoint a deputy nominating officer to sign nomination forms. The party was not required to notify the Commission of this, but should have a clear arrangement in place within its own party structures.

### 3 Issues raised by the political parties

- 3.1 No items had been raised by the parties in advance of the meeting.

## 4 Electoral Commission reports on UK Parliamentary General Election

- 4.1 The Chair made the Panel aware of a recent Electoral Commission Board discussion on the impact of digital media on elections. The Board is very aware of digital media's potential impact and is considering its own approach to regulation.
- 4.2 The Commission had taken a new approach to reports for the UK Parliamentary Election. Instead of publishing one long report, it would be publishing a series of shorter reports on different issues, including Northern Ireland issues as appropriate.
- 4.3 The Panel was advised of the following publication schedule:
- Electoral registration at UKPGE (published on 17 July): this report repeated the Commission's call for online registration to be introduced in Northern Ireland.
  - Voter experience of polls (10 October)
  - Administration of the poll (30 October): this report would focus on electoral administration issues.
  - Candidate experience of polls (6 November)
  - Voters with disabilities' experience of polls (14 November)
  - Commentary on party finance and regulation issues, along with details of candidate and party campaign spending (less than £250k) (16 November)
  - Party campaign spending returns (more than £250k) (early 2018)
  - Allegations of electoral fraud (early 2018)

## 5 First publication of donation and loans returns

- 5.1 The Electoral Commission had welcomed the announcement by the Secretary of State for Northern Ireland on 3 July 2017 that, in future, information about donations and loans to Northern Ireland parties would be made public. This would apply to donations and loans accepted from 1 July 2017 onwards, and in practice would mean that the donation and loan information received for 2017 Quarter 3 (July to September) would be published.
- 5.2 The Commission had long pressed for transparency in order to increase confidence in the political system and would continue to lobby for transparency to be back-dated to January 2014, as was envisaged in the primary legislation passed at that time.
- 5.3 Since the announcement, the Commission has been commenting on the draft secondary legislation needed to enable transparency. The legislation was expected to be laid in Parliament early in October, subject to the parliamentary timetable. Once passed, the Electoral Commission would be able to publish the donation and loan information provided by political parties and regulated donees from 1 July 2017. It hoped to publish the first donations and loans data (for 2017 Q3) later in 2017, as long as there were no legislative delays.
- 5.4 Parties should submit their donation and loan returns to the Electoral Commission as previously, and should contact the Commission if they had any questions on the practicalities of how transparency will work. The deadline for submission of returns for 2017 Quarter 3 is 30 October.
- 5.5 Once the enabling legislation was laid in Parliament, the Commission intended to publish guidance on the new framework, for circulation to all parties, MPs and MLAs.

## 6 Electoral Commission modernisation projects

- 6.1 The Chair informed the Panel of two UK-wide Commission projects to improve the service provided to stakeholders. The Commission would be consulting widely on both and asked for the parties' participation in this. A paper on each project had been circulated in advance of the meeting. [REDACTED] the Project Manager, gave a detailed briefing on each project.

### Delivering modern guidance

- 6.2 The Delivering Modern Guidance project had been set up to recommend a way forward which retained the quality and scope of the Commission's guidance but modernised its ease of use for the digital age. [REDACTED] talked the

Panel through an analysis of the existing system, user testing, good practice elsewhere, and a review of technological options. The conclusion so far was that it was not practical to maintain the current approach to guidance which was based on pdf documents, and the Commission should look at moving to a web-based approach.

- 6.3 Some guidance would be developed in a web-based format by the end of 2017 for internal review, followed by wider consultation and user testing over the winter. If the new format was judged to be successful, a tailored phased introduction was planned from April 2018.

highlighted how useful the involvement of the Northern Ireland parties would be in ensuring the new system best met local needs. She asked the parties to consider taking part in the testing and design of the new system. This would involve a couple of phone calls pre-Christmas, a 2-3 hr meeting in January/March 2018 and a couple of subsequent phone conversations.

- 6.4 The party representatives echoed the user consultation findings so far that they had difficulty locating relevant information in the large volume of pdf-format guidance currently available.

## Re-development of PEF Online

- 6.5 also asked for the parties' participation in the project to replace the existing PEF Online system. A User Group would be a key part of the 'agile' delivery of this new system, with users' views built in to the initial and ongoing development of a new system. Involvement would mean an initial one hour talk to a Business Analyst in Belfast, with heavier involvement (over 6-8 months) from Easter at the start of the build. This might involve workshops in Belfast and a fortnightly hour-long feedback session. It is planned the new system would be phased in during 2019.
- 6.6 Only one major party in Northern Ireland consistently used PEF Online, with Panel members reporting they had found it complicated to use, including making changes to office holders etc. They would welcome a system that was easier to use.
- 6.7 Following a wider discussion on which party members may be most relevant to feed in views, the parties were asked to contact Ann Watt if they were interested in participating in either of the above projects. The Chair encouraged the parties to participate in the user consultation, in order to ensure the views of the Northern Ireland parties were reflected.

## 7 Chief Electoral Officer for Northern Ireland - update

### Online registration

- 7.1 The CEO reported that online registration, mirroring that in the rest of the UK, was undergoing final testing and was due to be introduced in November. Online applications would probably take 1.5 - 3 minutes in time and should be straightforward. The existing paper-based form registration process would remain for those who preferred to use it.
- 7.2 As discussed at previous meetings, the introduction of this system had been delayed because of recent elections. EONI staff's feedback on the system had been positive, and of course Northern Ireland had benefitted from learning experiences from the rollout of the online registration system in Great Britain first.
- 7.3 The CEO would be contacting parties to arrange meetings to discuss a communication strategy and will arrange an opportunity to view the system. Research shows that registration advertising campaigns outside of election periods do not provide value for money so there will be a 'soft launch' with only a small amount of PR. A key part of the public message would be aimed at avoiding duplicate registrations, so existing electors did not attempt to re-register unless their details had changed.
- 7.4 As part of a wider discussion on registering attainments, the CEO highlighted the challenges of the current situation, trying to balance remaining on standby for a possible election with other work such as offering young people the opportunity to register through EONI's programme of visiting schools. The CEONI said that they were considering how to phase in a new format of the schools programme once online registration was in place.
- 7.5 A party representative asked about whether EONI's schools programme reached a balanced set of schools across Northern Ireland. The CEONI confirmed that it did.

### Absent votes

- 7.6 The CEO had reviewed the administration of the absent votes regime following the allegations of fraud widely covered in the media around the time of the UK Parliamentary General Election. Seven cases had been reported to the PSNI.
- 7.7 As part of this review, the largest group of people who repeatedly applied for an absent vote had been identified as people working away from home (around 3,600 electors). The CEO suggested one possible step would be to check whether the individuals within this group still met the criteria for being on the electoral register at this address.

## 8 Political Finance – statutory return deadlines

- 8.1 Parties were reminded that donation and loan reports for Quarter 3, 1 July – 30 September 2017 must be submitted to the Commission by 30 October 2016.

## 9 Any Other Business

- 9.1 A party representative asked for clarification on the process to register party emblems, particularly about whether another party could register an emblem similar to one of an existing party. It was confirmed that for new applications, any proposed emblem was compared to existing emblems on the Commission's register. If these were similar, the new application would be rejected to avoid voter confusion on ballot papers.
- 9.2 A party queried if it would be appropriate for the Electoral Commission or Information Commissioner's Office to provide training or guidance to parties regarding the new 2018 Data Protection legislation. The Electoral Commission was currently reviewing the impact of this legislation and would update the Panel.

## 10 2018 Meeting Dates

- 10.1 The Commission tabled a schedule of proposed dates for APP meetings during 2018 and asked party representatives to contact the Commission within the next few days if there were availability issues.

	Tuesday 30 January 2018
Tuesday	10 April 2018
Tuesday	19 June 2018
Tuesday	16 October 2018

- 10.2 It was agreed all meetings would start at 9.30am and, with the consent of the parties, the Commission would consider cancelling meetings if there were insufficient items for discussion.

## List of agreed actions

Action	Responsible
Consider participation in projects to modernise – Guidance and PEF Online	Party representatives
Submit donation and loan returns for Quarter 3 by 30 October 2017.	Party representatives
Update on 2018 Data Protection legislation	Commission
Check availability for 2018 APP dates	Party representatives

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 September 2017 09:04  
**To:** [REDACTED]  
**Subject:** NI transparency Order  
**Attachments:** NI update web.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Morning [REDACTED]

Welcome back! How was your holiday?

Thought I'd quickly update you on NI while you've been away:

1. Order hasn't been laid yet – we thought we'd hear on Friday if it would be laid this week but haven't. I think they're struggling to find a slot as everything is being taken up with Brexit.
2. The [factsheet](#) is with Bob for approval. The main change was to your table – we noticed that once you go over the threshold the clock starts again and the next set of reportable donations are carried over. Have a look at the table – it's easier to understand rather than me trying to explain.
3. The [letter](#) to the parties informing them of the changes is here.
4. Website [link](#) for the factsheet has been set up – this will be used for the media statement.
5. Website update is attached
6. Table of internal implementation action points is [here](#) – this is worth a look at some point.

I'll continue to lead on this for the next couple of days, but if nothing happens I may hand it back to you if that's okay? It should be relatively straightforward as everything is set up. We can chat it through tomorrow in any case.

By all means suggest amends or feed in thoughts if you have them.

Good to have you back.

Cheers

[REDACTED]  
**Party Finance Guidance Manager**  
**Electoral Administration and Guidance**  
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## Democracy matters



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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 20 October 2017 14:39  
**To:** [REDACTED]  
**Cc:** [REDACTED] Ann Watt  
**Subject:** Processing Q3 NI Donation and loan returns

Hi [REDACTED] and [REDACTED]

Following on from our conversations earlier today about recording receipt of donation and loan returns received into the NI office in order to avoid duplication/confusion I thought I would set out my understanding of what will happen. Please come back to me if this isn't correct or you think it makes more sense to do things a different way.

The NI office will:

- Log receipt of any physical /email returns submitted to the NI office in the NI post log and document record sheet in the Q3 2017 physical folder in the NI safe.
- Scan and upload the returns as soon as possible to the relevant party's sub folder in the 'NI Transparency' Folder on the N Drive.
- Complete the '**data**' sheet on the "*Current donations and loans spreadsheet 2008 onwards*" (ie date received and logged and colour coded to indicate if it reported a donation /loan or if it is a 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup> nil return.) We will leave London colleagues to complete the '**Notes**' sheet which appears to be a new addition on the spreadsheet.
- We will record the details of actual donations reported on the political party data spreadsheet, as we have previously been doing and will carry out permissibility checks on any reports received into the NI office - We can agree how you would like completion of the checks communicated to you/recorded.

We will not enter data on any of the newly formed spreadsheets in the Q3 sub-folder in the NI transparency folder. i.e. exemptions spreadsheet and a publications spreadsheet

In terms of the detail of any changes to existing loans – we can continue to log this on the existing loans sheet if you are happy with that? If there are new loans we can agree where is best to record these on the N drive – as well as PEF online if that is proposed.

As mentioned I'm happy to do things another way, but we are now receiving Q3 2017 returns and I would like to avoid any confusion about who records what and where.

Please give me a call if you would like to discuss this.

Regards

[REDACTED]  
[REDACTED]  
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### Putting voters first

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**From:** Ann Watt  
**Sent:** 12 October 2017 14:35  
**To:** [REDACTED]  
**Cc:** Bob Posner; Louise Edwards; Louise Footner  
**Subject:** Publication of donation and loan information for Northern Ireland - change to Scheme of Delegation

Dear [REDACTED]

As discussed, we need to make a change to the Scheme of Delegation to set out who signs off the publication of donation and loan reports from Northern Ireland parties. Bob, Louise Edwards and Louise Footner have agreed the approach below. I would be grateful if you could pass this on to Claire for her approval.

The most relevant line in the current [Executive Scheme of Delegation](#) is below:

<b>Sign off publication of statutory returns - figures</b>	Head Regulatory Compliance and Casework	Compliance Team Manager or Director PFR and Legal Counsel	Heads of Electoral Commission in S/W/NI informed
--	---	---	--

Publication of the donation and loan returns for Northern Ireland donations is more complex than other statutory returns, since the Commission has to be sure not to publish any information that under PPERA 71E should remain confidential (ie information relating to donations or loans before 1 July 2017). Given this complexity, we suggest that we create an additional line in the Scheme of Delegation (see red text below). Given that the Regulation team is handling the Northern Ireland donation and loan returns and preparing the data for publication, we think it is more appropriate that Louise E signs off the publication, but that Ann is consulted.

<b>Sign off publication of donation and loan returns for Northern Ireland parties and regulated donees - figures</b>	Head of Regulation	Director PFR and Legal Counsel, or Head of Electoral Commission in NI	Head of Electoral Commission in NI to be consulted
--	--------------------	---	--

Many thanks

Ann

**Ann Watt**  
**Head of Electoral Commission, Northern Ireland**  
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[REDACTED]

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**From:** Ann Watt  
**Sent:** 04 September 2017 15:10  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Aggregation examples for NI confidentiality Order

Thanks [REDACTED] and apologies it has taken me so long to look at this.

I think the examples are very helpful, and cover all the scenarios I can think of. I've made one comment.

Ann

---

**From:** [REDACTED]  
**Sent:** 08 August 2017 17:11  
**To:** [REDACTED] Ann Watt  
**Cc:** [REDACTED]  
**Subject:** Aggregation examples for NI confidentiality Order

Hi,

Following a chat with [REDACTED] I have put together some examples of aggregation of NI donations during 2017. This is to help us check we understand the rules, and to begin thinking about which examples might go into the factsheet.

<http://skynet/dm/Functions/PEFpol/HMG/Confidential%20NI%20donations/Aggregation%20examples%20NI%20Confidentiality%20Order%202017.docx>

Hopefully this will be useful in thinking about the sorts of scenarios we might get. If you have any comments on any of the examples please add them in or let me know.

Thanks,

[REDACTED]

[REDACTED]  
**Guidance Adviser**  
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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 15 November 2017 13:58  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Q3 political party donations and borrowing

Hi [REDACTED] and [REDACTED],

With thanks to [REDACTED] and [REDACTED], we've put together the drafts of the Q3 political party donations and borrowing report ready for publication on 23<sup>rd</sup> November.

The [summary](#), [press release](#), [social media](#) and [LTT](#) can all be found in the links here.

The statement on Northern Ireland which [REDACTED] has put together is here:  
<http://skynet/dm/Functions/media/Press%20releases/Media%20statement%20-%20NI%20donations%20and%20loans%20Q3.docx>

[REDACTED] flagged the Scottish Labour leadership contest, which we have drafted some lines for in the LTT, however these will need to be updated next week (when we know the outcome and have latest list of donations and loans to regulated individuals and organisations).

It would be great if you can have a look over these and send over your thoughts before 1pm tomorrow please, when I'll then send over to Louise and Ben (Louise is away Friday, so we need to make sure she sees this tomorrow).

Thanks for all your help,  
[REDACTED]

[REDACTED]  
**Senior Communications Officer (Media relations)**

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**From:** Ann Watt  
**Sent:** 02 October 2017 11:20  
**To:** [REDACTED]  
**Subject:** Q3 donation and loans returns - reminders

Hi [REDACTED] – given the 30 Oct deadline is approaching, are you sending reminders to the parties?

I think the reminder should also point out that this data will be the first set to be published, and offer our assistance with any queries parties may have.

Thanks

Ann

**Ann Watt**  
**Head of Electoral Commission, Northern Ireland**  
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**From:** [REDACTED]  
**Sent:** 30 November 2017 11:42  
**To:** [REDACTED]  
**Subject:** RE: In the News - Thursday 30 November 2017  
**Attachments:** Derry News.pdf

[Sure – attached is the PDF](#)

**From:** [REDACTED]  
**Sent:** 30 November 2017 11:35  
**To:** [REDACTED]  
**Subject:** RE: In the News - Thursday 30 November 2017  
[Do you have a copy of that Derry News article?](#)

**From:** [REDACTED]  
**Sent:** 30 November 2017 11:08  
**To:** All EC Staff - All Sites; Commissioners Protected  
**Subject:** In the News - Thursday 30 November 2017

## Britain First

Donald Trump yesterday retweeted a series of islamophobic videos posted by the deputy leader of Britain First, Jayda Fransen. The twitter activity sparked major media interest, and Theresa May is reported on the front page of the [Guardian](#) to have condemned Trump's actions. However the paper reports that "Downing Street rejected calls from Labour MPs to revoke the US president's invitation to pay a state visit to Britain."

The press office received a number of calls from journalists about Britain First because they "Statutorily Deregistered" on our website. We worked with the party registration team to inform journalists that; "in order to remain registered, each year a party must deliver a confirmation that their registered details are correct, along with a fee of £25. The confirmation must be delivered to the Commission within 6 months of the deadline for the submission of the party's statement of accounts. Britain First was due to deliver their confirmation by 31 October 2017. The party did not deliver the confirmation by the deadline and accordingly the Commission removed the party from the register as required by law." This was also reported in the **Guardian** [page 4], **Daily Mail** [page 11], **i** [page 4] [CNN](#), and [Wall Street Journal](#) [paywall].

James Landale, Diplomatic Correspondent for BBC News, also tweeted Trump with the information we provided:



**James Landale** ✓  
@BBC/Landale

Following

[@realDonaldTrump](#) Just for the record, Britain First is no longer officially a political party. It was de-registered by [@ElectoralCommUK](#) on Nov 2 this year after failing to pay its £25 sub.

2:04 PM - 29 Nov 2017

The retweets continues to receive news coverage with politicians including [Jeremy Corby](#) condemning Trumps' actions, [analysis pieces](#) on Britain First, and [comment pieces](#).

## Vote Leave investigation

[Times Higher Education](#) supplement reported today in its weekly roundup that the Commission has launched an investigation into Vote Leave. It notes the investigation looks into whether Vote Leave "gave £625,000 to a University of Brighton fashion student", and reference the Daily Mail from 20<sup>th</sup> November; "Vote Leave handed cash to activist Darren Grimes and Veterans for Britain

as it neared its £7million spending limit ahead of the EU referendum.” The piece concludes saying “Mr Grimes’ campaign, BeLeave, managed to attract only 6,300 Facebook likes and just 3,700 Twitter followers, it has previously been reported. And the thanks that Vote Leave receives for supporting this fine example of student entrepreneurship is a grilling from the Electoral Commission.”

## Russian Interference

Yesterday a [cross-party of MEPs](#) raised concerns with the European Commission about alleged Russian interference in the EU referendum. Green, Labour, Lib Dem and Plaid Cymru MEPs together with an ex-Conservative MEP have signed a [letter](#) to the Commission about their concerns. They have asked how much the Commission know of Russian influence in the referendum campaign and of the techniques used; whether they consider such interference was an attempt by the Kremlin to attack and destabilise the EU; and whether they will use EU agencies to investigate the allegations.

Liam Byrne of **The New European** [print only, page 8-9] also reports today on “who’s hacking Brexit?” The article looks at alleged Russian interference and says their “campaign dates back many years. The beginning of Russian involvement entailed lots of encouragement for Nigel Farage.” Byrne goes on to talk about General Valery Gerasimov “the Russian army’s Chief of Staff”, and his apparent “revised thinking based on the insight that the rules of war have changed” and that it “now centres on wholesale interference in Western democracy”. The article details the five steps Russia has apparently taken to achieve this on social media, and references our investigation into funding of the referendum and states the commission cannot “investigate foreign individuals donating and cannot insist on the same sort of imprints for digital ads that are required on printed literature” – something we have reputedly recommended. It finishes up reporting on Legatum and Christopher Chandler connections to Russian, and calls on Britain to “get to the bottom of whether our democracy has been hacked.”

## Northern Ireland

**Derry News** [print only, page 4] reports that “the British Government’s refusal to backdate new laws on political donations is aimed at covering up so-called Brexit ‘dark money’ that was paid to the DUP, Sinn Féin MP Elisha McCallion has said.” McCallion is reported referencing our statement to the Government before the order was laid last Thursday, and says “there will be no transparency around the vast sums that were paid to the DUP during the Brexit referendum.” The MP is calling for the reporting to be backdated to January 2014.

## Labour’s elections candidates

Owen Jones in the [Guardian](#) today reacts to yesterday’s Times article on “Moderates forced out by hard left in Labour purge.” Jones puts the other side of the story saying “members have democratically decided that some sitting councillors should face an open contest. This happened automatically until a rule change last year. Calculating that they will lose to a leftwing alternative, some have stood down.” He goes on to say “this is what is known as “democracy”, and references what is happening in Haringey. Jones concludes saying “The truth is this: the rightwing press, the Tories and the vested interests who fund and support them are terrified of Momentum”, and “democratisation of the Labour party is a good thing – and necessary if a democratic socialist society really will be built.”

Meanwhile Peter Jones writes on [Labour List](#) that “Labour has quietly dropped plans to select candidates for 75 target seats before Christmas.” This apparently comes as Corbyn wanted “to get candidates in place following a summer of campaigning. He had said the party would remain in “permanent campaign mode” amid speculation Theresa May’s government could fall after the prime minister squandered the Tories’ majority in the June election.”

## For interest

It’s reported on the [Electoral Reform Society’s](#) blog that they have a new Council to govern the Society for the next two years. It states that “39 candidates standing for the 15 seats available” and “members had four weeks to vote using the Single Transferable Vote system of proportional representation.” A full list of the new council is [here](#).

## On this Day

**Today's front pages.**

**1956** – Then Prime Minister, Winston Churchill, celebrates his 80<sup>th</sup> birthday

**1982** – A letter bomb from animal activists explodes inside Downing Street injuring a member of staff

**1995** – Bill Clinton is the first serving US president to visit Northern Ireland

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 September 2017 17:34  
**To:** Bob Posner  
**Cc:** [REDACTED] Ann Watt; [REDACTED]  
**Subject:** RE: Factsheet

Thanks Bob – comments are helpful and clear.

[REDACTED]

---

**From:** Bob Posner  
**Sent:** 11 September 2017 17:21  
**To:** [REDACTED]  
**Cc:** [REDACTED]; Ann Watt; [REDACTED]  
**Subject:** RE: Factsheet

Thanks [REDACTED] Nice clear factsheet and really good to include the aggregation examples. However, I have made a few comments. Hope / think they can readily be addressed.

Bob.

**From:** [REDACTED] <[\[REDACTED\]@electoralcommission.org.uk](mailto:[REDACTED]@electoralcommission.org.uk)>  
**Date:** 8 September 2017 at 12:55:02 BST  
**To:** Bob Posner <[\[REDACTED\]@electoralcommission.org.uk](mailto:[REDACTED]@electoralcommission.org.uk)>  
**Subject:** FW: Factsheet

Hi Bob

As discussed earlier in the week, the NI transparency factsheet has been approved by legal and Ann in NI. Can you please have a look and sign it off. I'm hoping to be ready to publish on Monday in case the Order is laid then. Appreciate you're away now until Monday so sending this now just in case you pick up emails over the weekend.

<http://skynet/dm/Functions/PEFpol/Potential election events/NI confidentiality Order factsheet 2017.docx>

thanks  
[REDACTED]

---

**From:** Ann Watt  
**Sent:** 08 September 2017 12:41  
**To:** [REDACTED]  
**Subject:** Factsheet

Hi [REDACTED] – this looks very good, many thanks.

I have a couple of questions about the aggregation examples. Could you give me a call when you are free please.

Ann

**Ann Watt**

**Head of Electoral Commission, Northern Ireland**

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 08 September 2017 14:32  
**To:** [REDACTED]  
**Subject:** RE: Link for NI factsheet

Brilliant – thank you for this.

---

**From:** [REDACTED]  
**Sent:** 08 September 2017 14:17  
**To:** [REDACTED]  
**Subject:** Link for NI factsheet

Hi [REDACTED]

In case you need it, this is the link to the NI factsheet.

[http://www.electoralcommission.org.uk/\\_data/assets/pdf\\_file/0003/233688/NI-Donations-and-Loans-2017-Factsheet.pdf](http://www.electoralcommission.org.uk/_data/assets/pdf_file/0003/233688/NI-Donations-and-Loans-2017-Factsheet.pdf)

It is live and a dummy is loaded, although it does not yet appear on the website. I am not sure if you still need it for Monday.

[REDACTED]

[REDACTED] [REDACTED]  
**Senior Advisor (Guidance)**  
**Party and Election Finance**  
The Electoral Commission  
3 Bunhill Row  
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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 31 August 2017 13:40  
**To:** [REDACTED]  
**Subject:** RE: Media statements and coordination with NIO - transparency Order

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I'll discuss with Ann and get back to you on that. Probably a combo of Ann and someone in media team

---

**From:** [REDACTED]  
**Sent:** 31 August 2017 13:39  
**To:** [REDACTED]  
**Subject:** RE: Media statements and coordination with NIO - transparency Order

Ok – tomorrow might be too early to discuss statements. Who is picking up the statement from NI in your absence?

---

**From:** [REDACTED]  
**Sent:** 31 August 2017 13:38  
**To:** [REDACTED]  
**Subject:** RE: Media statements and coordination with NIO - transparency Order

Hi [REDACTED]

Im on leave next week – Im in tomorrow and then back on 12<sup>th</sup>

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 31 August 2017 13:18  
**To:** [REDACTED]  
**Cc:** Ann Watt  
**Subject:** Media statements and coordination with NIO - transparency Order

Hi [REDACTED] – NIO are saying that the Order might now be laid w/c 11 September (instead of next week). [REDACTED] is going to send an email update later with details.  
It might be worth us having a quick chat next week about how you're going to coordinate our statement with NIO's and having that ready. I assume any statement we make will be similar to those we've already issued? I also understand NIO want to link to our new factsheet when they make their statement but there's a few bits to synchronise before that happens.

Ann – I'll brief you very quickly at 2pm.

[REDACTED]

[REDACTED]  
**Party Finance Guidance Manager**  
**Electoral Administration and Guidance**

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## Democracy matters



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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 November 2017 09:38  
**To:** [REDACTED]  
**Subject:** RE: Media statement: Transparency of political finance in Northern Ireland

No problem – that's all done now.

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 18:19  
**To:** [REDACTED]  
**Subject:** RE: Media statement: Transparency of political finance in Northern Ireland

Hi [REDACTED] when you get a second, could you update the original statement that is on the website:

<https://www.electoralcommission.org.uk/i-am-a/journalist/electoral-commission-media-centre/news-releases-donations/transparency-of-political-finance-in-northern-ireland>

With the updated version which is below. The version below can just go above what's on the website with the wording 'Updated' that way both statements are in one place rather two separate ones both on the same day which may look confusing!

Thanks, [REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 17:02  
**To:** External Communications circulation group  
**Subject:** FW: Media statement: Transparency of political finance in Northern Ireland

Good evening

This afternoon the Transparency of Donations & Loans (Northern Ireland Political Parties) Order 2018 was laid before Parliament. This Order, when it comes into force will allow the Commission to start publishing information on donations and loans from political parties in Northern Ireland. We have issued the below statement to the media in Northern Ireland in response.

Earlier today we had expressed our disappointment that we were unable to publish this information today as we had originally envisaged.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 16:36  
**To:** [REDACTED]  
**Subject:** Media statement: Transparency of political finance in Northern Ireland

The  
Electoral  
Commission

# Media Statement

23 November 2017

## Transparency of political finance in Northern Ireland

In response to the announcement that the ‘Transparency of Donations & Loans (Northern Ireland Political Parties) Order 2018’ has now been laid in Parliament **Ann Watt, Head of the Electoral Commission in Northern Ireland said:**

“We are pleased that the UK Government has acted to make this important change a reality. Transparency in how our political parties are funded is key to ensuring public trust and confidence in the democratic process. We hope to be able to begin publishing this information early in the New Year.”

**Ends**

For further information please contact Cahir Hughes on 028 9089 4023 or [press@electoralcommission.org.uk](mailto:press@electoralcommission.org.uk) Out of office hours - 07789 920 414.

### Notes to editors

1. 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 by:
  - enabling the delivery of free and fair elections and referendums, focussing on the needs of electors and addressing the changing environment to ensure every vote remains secure and accessible
  - regulating political finance – taking proactive steps to increase transparency, ensure compliance and pursue breaches
  - using our expertise to make and advocate for changes to our democracy, aiming to improve fairness, transparency and efficiency

### **Senior Officer (Communications and Electoral Administration)**

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 November 2017 13:00  
**To:** Ann Watt  
**Subject:** RE: LinkedIn post on NI

That's great, thanks so much. And no problem – understand it's really important to be clear on this issues. Thanks again, and lovely to meet you in person.

---

**From:** Ann Watt  
**Sent:** 28 November 2017 12:58  
**To:** [REDACTED]  
**Subject:** RE: LinkedIn post on NI

Hi [REDACTED] sorry for the delay in responding on this. Some small changes below.

I'm afraid I've made the 1<sup>st</sup> sentence more clunky but it's important to be clear that we can't publish the data until the legislation comes into force.

thanks

Ann

---

**From:** [REDACTED]  
**Sent:** 28 November 2017 11:11  
**To:** Ann Watt  
**Subject:** FW: LinkedIn post on NI

Hi Ann,

Hope you are well – I think you're in London today, so will try and say hi.

Just wanted to check in and see if the below LinkedIn post was okay to go out, and get your thoughts please?

Thanks and best wishes,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 November 2017 14:58  
**To:** Ann Watt  
**Cc:** [REDACTED]  
**Subject:** LinkedIn post on NI

Hi Ann and [REDACTED]

Hope you are well?

We're trying to improve the content on our LinkedIn page, and we thought donations in NI would be a really interesting thing to post about. I've drafted a post from Ann, based on our statements, and just wanted to check you are happy with it to go out, say Monday sometime?

Do let me know your thoughts.

Best wishes,

## LinkedIn Post

“We are **really** pleased that the UK Government acted last week to **bring forward legislation that, once it comes into force, will allow us to publish** information on how political parties in Northern Ireland are funded,” says Ann Watt, Head of the Electoral Commission in Northern Ireland.

“In response to the news that the necessary legislation had been put before parliament, we immediately published our factsheet explaining the changes to the rules. We also wrote to all Northern Ireland political party treasurers, as well as MPs and MLAs explaining the changes to the rules and where they can find more information on our website.

“The current continuing secrecy around donations to political parties only serves to undermine trust and confidence amongst the public in the democratic process. Transparency in how our political parties are funded is essential.

“Once the legislation comes into force in the New Year we will begin publishing this information - making this important change a reality.”

“A number of colleagues across the Electoral Commission have worked behind the scenes to ensure information to help political parties and ‘regulated donees’ in Northern Ireland **understand** the new rules was ready as soon as possible. You can find out more about what this important change to the legislation means and what advice is available to parties in our factsheet here:

[http://www.electoralcommission.org.uk/data/assets/pdf\\_file/0003/233688/NI-Donations-and-Loans-2017-Factsheet.pdf](http://www.electoralcommission.org.uk/data/assets/pdf_file/0003/233688/NI-Donations-and-Loans-2017-Factsheet.pdf)

[picture of Ann]

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 15 November 2017 11:25  
**To:** [REDACTED]  
**Subject:** RE: NI comms if Order is laid in 2018

Cheers [REDACTED]

---

**From:** [REDACTED]  
**Sent:** 13 November 2017 16:28  
**To:** [REDACTED]  
**Subject:** NI comms if Order is laid in 2018

Hi [REDACTED]

Had a look at some stuff with regard to possible changes if the Order isn't laid until next year:

[Factsheet](#) – couple of minor changes including correcting a typo. Made clear where dates are in 2017 as this will be less obvious next year.

[Letter](#) to go with publication of factsheet – like the factsheet, stuff to do with when we will first publish will need to be changed/deleted. There is also lots more specifically about Q3 – we may need to take a view as to how relevant that still is by the time the Order is laid – the deadline may be well in the past by then. This I might need to talk through with you, which we could do on Weds in our last 121 if that's best – or Tuesday if you'd like me to do it earlier.

Was there anything else to check? I know you said you'd done something but wasn't sure what it was.

I also checked with Ann and she said to use the NI email address on all these things.

[REDACTED]

[REDACTED]

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 21 June 2017 09:19  
**To:** Ann Watt; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: NI Confidentiality reform Order factsheet

And here's the website [updates](#) following thoughts from [REDACTED] Grateful for views on the reg donee bit in particular. [REDACTED] – useful for you to view also especially regarding the publication bits.

It would be handy to get the updates and factsheet signed off (as far as we are able to) in advance so we can coordinate things from our side.

**Ann** – we are working on the revised letter to the NI parties – I'll send that over to you when it is ready. In [REDACTED] absence who is best person to coordinate sending the letter from NI – I assume [REDACTED]?

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 20 June 2017 16:23  
**To:** Ann Watt; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: NI Confidentiality reform Order factsheet

Hi both,

A draft of the NI transparency factsheet is here:

<http://skynet/dm/Functions/PEFpol/Potential%20election%20events/NI%20confidentiality%20Order%20factsheet%202017.docx>

I realise the details may change before the Order is laid, but thought you might want to look at the factsheet while it's all fresh in your minds. Let me know if you have any comments, or add them in.

Is there an already-alighted-on acronym for the Order?

Thanks,

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 30 October 2017 09:28  
**To:** [REDACTED]  
**Subject:** Re: NI Order

Hi  
Not really! [REDACTED] sent me an email on Tuesday last week saying that they haven't firmed up any plans for laying

Let's speak when I am in and I'll update you on what I know , which isn't much

[REDACTED]  
Sent from my iPhone

On 30 Oct 2017, at 07:35, [REDACTED] wrote:

Hi [REDACTED]  
Just checking on whether we have an update from NIO on the Order being laid? It's my first week back from holiday so seeing where things stand.  
Thanks  
[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 September 2017 14:45  
**To:** [REDACTED]  
**Subject:** RE: NI donations transparency order update CCM:0173402

Yep, I'll be around.

---

**From:** [REDACTED]  
**Sent:** 11 September 2017 12:44  
**To:** [REDACTED]  
**Subject:** FW: NI donations transparency order update CCM:0173402

Hi [REDACTED]

Are you around on Wednesday / Thursday to help publish some NI website updates?

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 September 2017 12:30  
**To:** [REDACTED] Ann Watt; Bob Posner; Tom Hawthorn; [REDACTED]  
[REDACTED] Louise Edwards; Joanne Crofton-Diggins; [REDACTED]; Louise Footner; [REDACTED]  
**Subject:** RE: NI donations transparency order update CCM:0173402

Hello

I have an update from [REDACTED] at NIO.

Apparently it is still possible that the Order will be laid this week (so I misinterpreted the lack of updates on Friday, sorry about that!).

I think that we will hear tomorrow afternoon whether or not it will be laid

The possible laying slot is Wednesday afternoon.

So, [REDACTED] Ann and Bob, it seems sensible to carry on with preparations for responding to the laying of the Order –ie: signing off the factsheet, our statement and website update etc.

Thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 September 2017 10:11  
**To:** [REDACTED] Ann Watt; Bob Posner; Tom Hawthorn; [REDACTED]

[REDACTED]; Louise Edwards; Joanne Crofton-Diggins; [REDACTED]; Louise Footner; [REDACTED]

**Subject:** NI donations transparency order update

Hi

Just to let you know that I didn't hear anything from [REDACTED] at NIO on Friday so I think that means that he didn't secure a laying slot for the SI this week.

If that's the case, I think he will now be trying to secure a slot for w/c 16 oct, which is after the party conference recess. At the moment, we can't tell if that would affect our projected publication date of late Nov/early Dec, because that depends on progress of the SI with committee slots and how quickly it could be made during October and November. It is still possible to 'make' the SI in time for the anticipated publication date but we'll have to see what happens

I'll update you when I hear something from [REDACTED] (and I'll call him today to chase)

Thanks

[REDACTED]

Sent from my iPhone

On 8 Sep 2017, at 15:02, [REDACTED] wrote:

All bets are off for Monday then.

---

**From:** [REDACTED]  
**Sent:** 08 September 2017 14:59  
**To:** [REDACTED]  
**Subject:** RE: Missed conversation with [REDACTED]

Not yet!!

---

**From:** [REDACTED]  
**Sent:** 08 September 2017 14:34  
**To:** [REDACTED]  
**Subject:** Missed conversation with [REDACTED]



Any news?

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 16 November 2017 13:19  
**To:** [REDACTED] Louise Edwards  
**Cc:** [REDACTED] Ann Watt  
**Subject:** RE: NI D and L Action point - for this afternoons meeting

Agree with [REDACTED] Aggregation only works for donations that are already over the £500 threshold – smaller donations do not aggregate to go over the £500, provided as he says that they are genuinely small donations.

Even in the case of say a phone bill that amounts to more than £500 over the course of a year, if it is genuinely paid each month I think our view would be that they are genuinely smaller monthly donations and hence do not count as donations under PPERA.

---

**From:** [REDACTED]  
**Sent:** 16 November 2017 12:35  
**To:** [REDACTED]; Louise Edwards  
**Cc:** [REDACTED]; Ann Watt  
**Subject:** RE: NI D and L Action point - for this afternoons meeting

My thought on this is that as they are incidental expenses (reimbursement for stationery for example) and are not instalments for a larger amount, I don't see how they could be donations as they are under £500.

Intrigued if others have any other thoughts.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 16 November 2017 12:31  
**To:** [REDACTED] Louise Edwards  
**Cc:** [REDACTED]; Ann Watt  
**Subject:** NI D and L Action point - for this afternoons meeting

Hi All,

I'm unable to access the link to action points list for this afternoon's meeting and I want to raise an issue.

We will be writing to parties asking them to give us a breakdown of the individual donations that make up payments under the NI A – Financial assistance to Political Parties Scheme(FAPPS) . The letter will also point out that going forward they will need to provide a breakdown of individual payments included in any aggregated amount they are reporting.

FAPPS is paid to parties in two main ways – Salaries– paid 3<sup>rd</sup> last working day of the month (I would expect each of these payments to be over £500) and ad hoc payments – for example to cover mobile phone bills, pay for constituency newsletters – each of these amounts is most likely well below £500.

My question is whether legally any of the smaller donations (

This is a question that I expect will come back to us once we send letters to parties so we will need to have any answer.

I wonder has the Commission received advice on this before?

[REDACTED]

[REDACTED]

**Senior Officer (Political Parties Liaison)**

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[REDACTED]

---

**From:** Louise Edwards  
**Sent:** 23 November 2017 09:23  
**To:** [REDACTED]  
**Subject:** RE: NI transparency - Order laid today

That's good news. And yes, something like that makes sense. It'll depend on how we can manage it alongside the large UKPGE returns now. Do talk to [REDACTED].

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 09:16  
**To:** Louise Edwards  
**Subject:** NI transparency - Order laid today

Hey – the NI order might be laid today. In our letters and factsheet we say that we'll publish the data towards the end of the year. I assume that's unrealistic now. I'll chat with [REDACTED] but I think it might be best to say something more generic like '....in early 2018'.

[REDACTED]

[REDACTED]

**Party Finance Guidance Manager**  
**Electoral Administration and Guidance**  
The Electoral Commission  
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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 September 2017 09:42  
**To:** [REDACTED]  
**Subject:** RE: NI transparency Order

Thanks [REDACTED] that's very helpful.

Holiday was very nice, if not exactly relaxing!

That's interesting about the way aggregation works – that had actually been my initial understanding of how it worked, but I changed it part way through. I must have got some wires crossed at some point when working it out.

Speak to you tomorrow,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 September 2017 09:04  
**To:** [REDACTED]  
**Subject:** NI transparency Order

Morning [REDACTED]

Welcome back! How was your holiday?

Thought I'd quickly update you on NI while you've been away:

1. Order hasn't been laid yet – we thought we'd hear on Friday if it would be laid this week but haven't. I think they're struggling to find a slot as everything is being taken up with Brexit.
2. The [factsheet](#) is with Bob for approval. The main change was to your table – we noticed that once you go over the threshold the clock starts again and the next set of reportable donations are carried over. Have a look at the table – it's easier to understand rather than me trying to explain.
3. The [letter](#) to the parties informing them of the changes is here.
4. Website [link](#) for the factsheet has been set up – this will be used for the media statement.
5. Website update is attached
6. Table of internal implementation action points is [here](#) – this is worth a look at some point.

I'll continue to lead on this for the next couple of days, but if nothing happens I may hand it back to you if that's okay? It should be relatively straightforward as everything is set up. We can chat it through tomorrow in any case.

By all means suggest amends or feed in thoughts if you have them.

Good to have you back.

Cheers

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## Joanne McCusker

---

**From:** Martin Carr  
**Sent:** 05 October 2017 11:04  
**To:** Louise Edwards  
**Cc:** Ann Watt  
**Subject:** RE: NI transparency Order - received dates

Looks good to me. Are you around for a chat today about this aggregated donations issue? Think this needs a joined up discussion with Bob, John and legal to get your views?

Martin

---

**From:** Louise Edwards  
**Sent:** 05 October 2017 10:57  
**To:** Martin Carr  
**Cc:** Ann Watt  
**Subject:** RE: NI transparency Order - received dates

Hi

How about this? Copied to Ann because she may well have views.

I've referred to disclosure notices by way of future-proofing this, mindful of course that we couldn't actually use that power until the order had come into effect. Let me know if you don't think that works.

Thanks

Louise

---

**From:** Martin Carr  
**Sent:** 28 September 2017 14:39  
**To:** Louise Edwards  
**Subject:** NI transparency Order - received dates

Hi Louise – the draft letter to the parties informing them of the changes to the transparency rules is [here](#). The relevant paragraph to insert your blurb about not publishing the data without the received dates is on page 2 under the heading 'changes that affect your reporting obligations'.

Martin

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 16:43  
**To:** [REDACTED]  
**Subject:** RE: Web updates

Thanks [REDACTED] – looks good. Appreciate all your help

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 16:30  
**To:** [REDACTED]  
**Subject:** RE: Web updates

Hi [REDACTED]

These should all be showing now (if they're not try with /\_recache at the end of the URL)

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 15:25  
**To:** [REDACTED]  
**Subject:** FW: Web updates

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 11:31  
**To:** [REDACTED]  
**Subject:** Web updates

These are the pages that will need the update

[REDACTED]

Parties page

<https://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/guidance-for-political-parties>

NI parties page

<https://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/guidance-for-political-parties/reporting-donations-and-loans-northern-ireland>

Donation to other individuals

<https://www.electoralcommission.org.uk/find-information-by-subject/political-parties-campaigning-and-donations/donations-and-loans-to-other-individuals-and-organisations>

Regulated individuals

<https://www.electoralcommission.org.uk/find-information-by-subject/political-parties-campaigning-and-donations/donations-and-loans-to-other-individuals-and-organisations/guidance-for-regulated-individuals>



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 14 November 2017 16:06  
**To:** [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks so much for your help getting this sorted.

I will use this to add in a line into the GB release and for the quote too. I'll ensure you (and Ann where appropriate) are copied in to see the release and LTT.

Thanks again,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 14 November 2017 14:26  
**To:** [REDACTED]; Claire Bassett; Ben Wilkinson; Bob Posner; Craig Westwood; Ann Watt  
**Cc:** Ailsa Irvine; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks all for your comments. I have cleaned up the press release and made the agreed amends:  
<http://skynet/dm/Functions/media/Press%20releases/Media%20statement%20-%20NI%20donations%20and%20loans%20Q3.docx>

This will be issued at the same as the Q3 press release in GB on the 23<sup>rd</sup>. I'll keep you updated thereafter

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 14 November 2017 10:12  
**To:** Claire Bassett; [REDACTED] Ben Wilkinson; Bob Posner; Craig Westwood; Ann Watt  
**Cc:** Ailsa Irvine; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update  
**Importance:** High

All

I am not absolutely sure without checking latest communications [REDACTED] has had that the legislation is absolutely ready to lay – and in any event something could happen that might affect the drafting, so I agree with Claire that our statement should be tempered accordingly. Also, please be aware that there can be **no disclosure of NI donations and loans etc until such time as the legislation is actually in force**. The legislation is an Order made by a statutory instrument which is subject to an affirmative Parliamentary procedure. This means that before it can come into force, the Order has to be laid, debated by and then if passed, made (i.e. signed by the appropriate Minister. The latest draft of the Order I have seen (24 October draft) provides for most of the Order to come into force on the day after the day on which it is made, with the articles which make provision relating to regulated donees coming into force on the 21<sup>st</sup> day after the day on which the Order is made. I will suggest tweaks to the proposed statement to reflect this.

[REDACTED]

---

**From:** Claire Bassett  
**Sent:** 14 November 2017 08:47  
**To:** [REDACTED] Ben Wilkinson; Bob Posner; Craig Westwood; Ann Watt

**Cc:** Ailsa Irvine; Louise Edwards; [REDACTED];

**Subject:** RE: Transparency in Northern Ireland - update

Thanks

Couple tweaks and thoughts from me- main one is about whether we know for a fact that the legislation is ready to lay and whether it would be better to preface with "We understand..." or, slightly stronger, "We have seen legislation ready..."?

Thanks

Claire

---

**From:** [REDACTED]

**Sent:** 13 November 2017 15:45

**To:** Claire Bassett; Ben Wilkinson; Bob Posner; Craig Westwood; Ann Watt

**Cc:** Ailsa Irvine; Louise Edwards; [REDACTED];

**Subject:** RE: Transparency in Northern Ireland - update

All

Proposed statement on delay of donations legislation in NI:

<http://skynet/dm/Functions/media/Press%20releases/Media%20statement%20-%20NI%20donations%20and%20loans%20Q3.docx>

Grateful for thoughts on this approach and the content.

Thanks

[REDACTED]

---

**From:** Claire Bassett

**Sent:** 10 November 2017 14:50

**To:** [REDACTED] Ben Wilkinson; Craig Westwood; Ann Watt

**Cc:** Executive Team; Louise Edwards; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Thanks all

I agree this has the potential to be a significant story in NI and possibly London as well. I think a fairly strong statement will be needed expressing our disappointment at this not happening given the apparent agreement and readiness of legislation etc. (Although very happy to discuss with NI as Ann [REDACTED] will have a better sense of what needed) I think timing wise we should wait until we would normally be putting a release out about publication for 23<sup>rd</sup> but might want to think about a wider handling plan. For example are we going to do reactive media? This is probably something to discuss and take sounds from [REDACTED] on too

---

**From:** [REDACTED]

**Sent:** 10 November 2017 14:37

**To:** Ben Wilkinson; Craig Westwood; Ann Watt

**Cc:** Executive Team; Louise Edwards; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Probably worth adding that any such statement will likely get significant coverage here as we will, by default, be the ones announcing the legislation has been delayed.

---

**From:** [REDACTED]  
**Sent:** 10 November 2017 14:35  
**To:** Ben Wilkinson; Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

I think we will need something separate for Northern Ireland (a statement rather than a press release as such) –we don't normally issue the quarterly press releases here so would seem odd to send GB figures on this occasion. Obviously whatever we say in both will be consistent.

---

**From:** Ben Wilkinson  
**Sent:** 10 November 2017 14:22  
**To:** Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

I assume the best way to approach this would be for us to include our criticism of the delay in the quote that goes out as part of our Q3 press release, rather than do something separate?

If anyone would favour a different approach, let us know.

[REDACTED] – for info

...  
**Ben Wilkinson**  
**Head of External Communications**  
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---

**From:** Craig Westwood  
**Sent:** 10 November 2017 13:36  
**To:** Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks for the update, Ann – disappointing, as you say, and I agree that we should adopt your approach publicly on the 23<sup>rd</sup>.

Do we also need to put a marker down publicly by saying that we expect the transparency commencement date to stay the same, despite the legislative delays? I assume that despite assurances, until we see the final SI there remains a risk that this could shift (and I guess may indeed be the cause of the delay).

Craig

---

**From:** Ann Watt  
**Sent:** 10 November 2017 13:31  
**To:** Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson  
**Subject:** Transparency in Northern Ireland - update

We met this morning with [REDACTED] from NIO. Not good news I'm afraid. The secondary legislation to enable publication of the NI donation and loan data is ready to be laid, but has been delayed. [REDACTED] did not tell us the reason for the delay. NIO's official line is that "the legislation is still going through internal government clearances".

[REDACTED] said that this delay could last for some time. On the positive side, he also said that progress could be made quickly at any point. So we should continue to press ahead with our preparations for publication of the first set of data.

We are due to publish the GB Q3 donation and loans data on 23 November, which is when we were expecting to publish the first set of NI data. Unless others disagree, on 23 Nov I think we should put out a strongly worded statement expressing our disappointment that the necessary legislation has not be laid. Given that the NIO has had to consult the Commission on the draft legislation, we might even say that we know that the legislation has been drafted and from our perspective is ready to be laid in Parliament.

Ann

**Ann Watt**  
**Head of Electoral Commission, Northern Ireland**  
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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 19 October 2017 10:07  
**To:** Ann Watt  
**Subject:** RE: Bel Tel article

Sorry was on another call – will try you later

---

**From:** Ann Watt  
**Sent:** 19 October 2017 09:56  
**To:** [REDACTED]  
**Subject:** RE: Bel Tel article

Can you give me a call. I think it is OK unless I'm missing something. I agree that it's not the focus of what I said but I don't think it's unhelpful.

---

**From:** [REDACTED]  
**Sent:** 19 October 2017 09:48  
**To:** Ann Watt  
**Subject:** Bel Tel article

Belfast Telegraph have twisted your words: <http://www.belfasttelegraph.co.uk/news/northern-ireland/plan-to-publish-party-donations-in-ni-does-not-go-far-enough-says-electoral-chief-36241097.html>

[REDACTED]  
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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 08 November 2017 15:07  
**To:** [REDACTED]  
**Subject:** RE: Confirmation of information in q3 2017 report - pulic funds template CCM:0217307

Hi [REDACTED]

Thanks for looking at the letter. Are you happy with the declaration on the form ?  
<http://skynet/dm/Functions/PEFpol/HMG/Confidential%20NI%20donations/Compliance/Form%20for%20Confirmation%20of%20details%20provided%20in%20donation%20report%20for%20Q3%202017.docx>

As I mentioned we hope to pre-populate the form as much as possible with any information the parties have already provided and they will be asked to fill in the blanks , sign and return the form to us. We can provide SAEs and that might help encourage parties to return the forms.

Regards

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 07 November 2017 14:31  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Confirmation of information in q3 2017 report - pulic funds template CCM:0217307

[REDACTED] (and others for info)

I added a comment to the latest draft letter last week. Given that the order still hasn't been laid as far as I know, it may be useful to take stock of the implications of the delay and handling going forward, before going forward with the letter?

Re preparation for implementation generally, I have made comments on some of the draft flowchart forms and will continue making my way through the remainder – aggregation, changes to loans and reasonable belief.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 02 November 2017 16:43  
**To:** [REDACTED]  
**Subject:** FW: Confirmation of information in q3 2017 report - pulic funds template CCM:0217307

All,

Good spot by [REDACTED] This is the link to the letter and  
<http://skynet/dm/Functions/PEFpol/HMG/Confidential%20NI%20donations/Compliance/1%20Nov%202017%20DRAFT%20Donations%20letter.docx> and this is the draft form

<http://skynet/dm/Functions/PEFpol/HMG/Confidential%20NI%20donations/Compliance/Form%20for%20Confirmation%20of%20details%20provided%20in%20donation%20report%20for%20Q3%202017.docx>

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 02 November 2017 16:21  
**To:** [REDACTED]  
**Subject:** RE: Confirmation of information in q3 2017 report - pulic funds template CCM:0217307

Thanks [REDACTED] – I can only see the form in the links and not the letter?

---

**From:** [REDACTED]  
**Sent:** 02 November 2017 14:40  
**To:** [REDACTED]  
**Subject:** FW: Confirmation of information in q3 2017 report - pulic funds template CCM:0217307

Hi [REDACTED]

You can see the draft letter and form below.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 01 November 2017 15:46  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Confirmation of information in q3 2017 report - pulic funds template CCM:0217307

Thanks [REDACTED]

It's looking like it will be my next working day (Friday) before I get to this. Is that OK with everyone? Do say if you need me to look at it before I leave this evening.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 01 November 2017 15:01  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Confirmation of information in q3 2017 report - pulic funds template

Hi [REDACTED]

Following on from our conversation yesterday I've had another bash at the letter and a draft form that we could send to the parties. Page 1 of the letter should be more or less the same for all parties and page 2 will be amended according what information we need to obtain. The form will be pre-populated with as much information as possible to encourage parties to complete and return it.

I'm focusing on donations from public funds at the minute as this is the main issue. We will likely have to tweak page 2 depending on other types of donations reported that we need clarification on. The form is very draft at the minute but hopefully it gives an idea of what we would be asking for .

[REDACTED]

Please have a look and see what you think- I think a one size fits all approach will not work for each case but hopefully we can tweak page 2 and the form as necessary.  
Letter

<http://skynet/dm/Functions/PEFpol/HMG/Confidential%20NI%20donations/Compliance/Confirmation%20of%20details%20provided%20in%20donation%20report%20for%20the%20reporting%20period%201%20July%202017.docx>

Form

<http://skynet/dm/Functions/PEFpol/HMG/Confidential%20NI%20donations/Compliance/Form%20for%20Confirmation%20of%20details%20provided%20in%20donation%20report%20for%20Q3%202017.docx>

Regards



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[REDACTED]

---

**From:** Lee Reynolds <LeeReynolds@dup.org.uk>  
**Sent:** 23 November 2017 12:28  
**To:** [REDACTED]  
**Subject:** Re: Media statement: Transparency of political finance in Northern Ireland

[REDACTED]

The timing of this is politically dubious only two days before our party conference.

This seems to be developing into a pattern of behaviour by the Electoral Commission ie its release of information about the DUP during the Assembly campaign.

Lee

Sent from my iPhone

On 23 Nov 2017, at 09:34, [REDACTED] wrote:

For info - the Commission has issued the below statement this morning regarding the publication of political donations and loans in Northern Ireland.

Regards  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 09:31  
**To:** [REDACTED]  
**Subject:** Media statement: Transparency of political finance in Northern Ireland

Media Statement

23 November 2017

Transparency of political finance in Northern Ireland

The Electoral Commission has today expressed its disappointment that it remains unable to publish the details of political donations and loans in Northern Ireland, because the UK Government has not yet made the necessary legislation.

In July the Secretary of State for Northern Ireland announced that he would bring forward legislation to enable the publication of donations and loans received by political parties in Northern Ireland from 1 July 2017.

The Electoral Commission had expected to publish the first set of data on donations to Northern Ireland political parties today, alongside the information on donations to political parties in Great Britain. However, it is unable to do so as the necessary legislation has not been made. Because of this the Commission continues to be prohibited from publishing any information relating to donations and loans received by political parties in Northern Ireland.

**In response to this, Ann Watt, Head of the Electoral Commission in Northern Ireland said:**

“We are extremely disappointed that we are unable to provide the public with the information they expected on how political parties in Northern Ireland are funded. The continuing secrecy only serves to undermine trust and confidence amongst the public in the democratic process.

We were consulted by the Northern Ireland Office several months ago on draft legislation and provided detailed comments. In our view the legislation is ready to be laid in Parliament now.

The Commission urges the UK Government to immediately bring forward this legislation to allow us to publish this information as soon as possible.”

## Ends

For further information please contact Cahir Hughes on 028 9089 4023 or [press@electoralcommission.org.uk](mailto:press@electoralcommission.org.uk) Out of office hours - 07789 920 414.

## Notes to editors

1. 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 by:
  - enabling the delivery of free and fair elections and referendums, focussing on the needs of electors and addressing the changing environment to ensure every vote remains secure and accessible
  - regulating political finance – taking proactive steps to increase transparency, ensure compliance and pursue breaches
  - using our expertise to make and advocate for changes to our democracy, aiming to improve fairness, transparency and efficiency

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 31 October 2017 15:30  
**To:** [REDACTED]  
**Subject:** RE: Meeting request from NIO

Hi [REDACTED]

He's coming to our office. It was [REDACTED] that spoke to him. Can you check Commission staff availability Thur and Fri AM (I assume Ann is not working on Wednesday ) so we can see what we can offer him on those days?

Have to log off for a bit – computer problems again !

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 31 October 2017 15:04  
**To:** [REDACTED]  
**Subject:** RE: Meeting request from NIO

[REDACTED]

I've been setting up other meetings for Ann on Tuesday – so know that's now out for her too. So we'll be talking Wednesday, Thursday or Friday.

If you can let me know when [REDACTED] is not available on those 3 days, I can work around that. Is he attending the meeting in our office?

Regards

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 31 October 2017 14:51  
**To:** [REDACTED]  
**Subject:** Meeting request from NIO

Hi [REDACTED]

[REDACTED] from NIO has requested a meeting with the Commission. We need [REDACTED] to attend by V/C from London.

Essential attendees – Ann (or me if Ann doesn't have availability ) and [REDACTED]

Desirable attendees – [REDACTED]

I'm on leave Monday and Tue next week and Ann is on leave Monday – if that helps .

Can you please see if you can set up a meeting next week.

Give me a shout if this isn't clear.

Many thanks



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[REDACTED]

---

**From:** Lee Reynolds <LeeReynolds@dup.org.uk>  
**Sent:** 23 November 2017 17:36  
**To:** Ann Watt  
**Cc:** [REDACTED]  
**Subject:** Re: Media statement: Transparency of political finance in Northern Ireland

Ann

The Electoral Commission is not a politically naive organisation and where the story would quickly go to was obvious as the Talkback discussion showed.

We made our position clear on the previous release during the Assembly campaign at the time.

Lee

Sent from my iPhone

On 23 Nov 2017, at 16:45, Ann Watt <[AWatt@electoralcommission.org.uk](mailto:AWatt@electoralcommission.org.uk)> wrote:

Lee

I was surprised by your email to [REDACTED] earlier, and disappointed by the allegation in it about the Electoral Commission. There was no mention of the DUP in our media statement. We are obliged under the law to publish donation and loan data as soon as reasonably practicable after receiving the returns. Our normal quarterly reporting timetable is to publish donation and loan data within 20 working days of the statutory deadline. On this basis, today was the date for the publication of the GB 2017 Q3 data. Our statement on transparency in Northern Ireland was necessary alongside it to explain why we were not publishing the Northern Ireland data at the same time.

Ann

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 13:28  
**To:** Ann Watt  
**Subject:** FW: Media statement: Transparency of political finance in Northern Ireland

Ann

Please see below email from Lee Reynolds

[REDACTED]

---

**From:** Lee Reynolds [<mailto:LeeReynolds@dup.org.uk>]  
**Sent:** 23 November 2017 12:28  
**To:** [REDACTED]  
**Subject:** Re: Media statement: Transparency of political finance in Northern Ireland

[REDACTED]

The timing of this is politically dubious only two days before our party conference.

This seems to be developing into a pattern of behaviour by the Electoral Commission ie its release of information about the DUP during the Assembly campaign.

Lee

Sent from my iPhone

On 23 Nov 2017, at 09:34, [REDACTED] > wrote:

For info - the Commission has issued the below statement this morning regarding the publication of political donations and loans in Northern Ireland.

Regards

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 09:31  
**To:** [REDACTED]  
**Subject:** Media statement: Transparency of political finance in Northern Ireland

<image003.jpg>

## Media Statement

23 November 2017

### Transparency of political finance in Northern Ireland

The Electoral Commission has today expressed its disappointment that it remains unable to publish the details of political donations and loans in Northern Ireland, because the UK Government has not yet made the necessary legislation.

In July the Secretary of State for Northern Ireland announced that he would bring forward legislation to enable the publication of donations and loans received by political parties in Northern Ireland from 1 July 2017.

The Electoral Commission had expected to publish the first set of data on donations to Northern Ireland political parties today, alongside the information on donations to political parties in Great Britain. However, it is unable to do so as the necessary legislation has not been made. Because of this the Commission continues to be prohibited from publishing any information relating to donations and loans received by political parties in Northern Ireland.

**In response to this, Ann Watt, Head of the Electoral Commission in Northern Ireland said:**

“We are extremely disappointed that we are unable to provide the public with the information they expected on how political parties in Northern Ireland are funded. The continuing secrecy only serves to undermine trust and confidence amongst the public in the democratic process.

We were consulted by the Northern Ireland Office several months ago on draft legislation and provided detailed comments. In our view the legislation is ready to be laid in Parliament now.

The Commission urges the UK Government to immediately bring forward this legislation to allow us to publish this information as soon as possible.”

## **Ends**

For further information please contact Cahir Hughes on 028 9089 4023 or [press@electoralcommission.org.uk](mailto:press@electoralcommission.org.uk) Out of office hours - 07789 920 414.

## **Notes to editors**

1. 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 by:
  - enabling the delivery of free and fair elections and referendums, focussing on the needs of electors and addressing the changing environment to ensure every vote remains secure and accessible
  - regulating political finance – taking proactive steps to increase transparency, ensure compliance and pursue breaches
  - using our expertise to make and advocate for changes to our democracy, aiming to improve fairness, transparency and efficiency

## **Senior Officer (Communications and Electoral Administration)**

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[REDACTED]

---

**From:** Claire Bassett  
**Sent:** 21 November 2017 10:21  
**To:** Ann Watt; John Holmes; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Letter to Secretary of State for Northern Ireland

I think its fine if asked for it or indeed we publish it on Thursday- the change in wording and slight delay just stops us looking like we are playing another agenda as well

---

**From:** Ann Watt  
**Sent:** 21 November 2017 09:47  
**To:** Claire Bassett; John Holmes; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Letter to Secretary of State for Northern Ireland

Thanks – we will make these changes and get the letter out today.

We will hold off publishing the letter, but we can expect to be asked for it by a journalist I think.

[REDACTED] – please can you send this letter out with John’s signature.

Ann

---

**From:** Claire Bassett  
**Sent:** 21 November 2017 08:58  
**To:** John Holmes; [REDACTED]  
**Cc:** Ann Watt  
**Subject:** RE: Letter to Secretary of State for Northern Ireland

I think this approach makes sense but would need to get it out today I think

---

**From:** John Holmes  
**Sent:** 20 November 2017 17:12  
**To:** [REDACTED]  
**Cc:** Claire Bassett; Ann Watt  
**Subject:** RE: Letter to Secretary of State for Northern Ireland

[REDACTED]

Many thanks for this. I am very happy to write to the Secretary of State on these lines. I have suggested in tracking a few minor changes, but I have one question. Are you sure it is the right thing to do to publish the letter immediately? I have suggested another way of achieving a similar result without making it look as if the letter is just a back-covering exercise for us. See what you think.

John

---

**From:** [REDACTED]  
**Sent:** 17 November 2017 16:08  
**To:** John Holmes  
**Cc:** Claire Bassett; Ann Watt  
**Subject:** Letter to Secretary of State for Northern Ireland

John

Claire has asked me to send you a proposed letter to the Secretary of State for Northern Ireland from you regarding the delay of the donations legislation. She can then discuss with you as needed early next week. Link is here (have also attached a copy):

<http://skynet/dm/Functions/CommsPublicAffairs/PublicAffairs/HolmesJ-to-BrokenshireJ-NI-donations-2017-11.docx>

We will be publishing Q3 donation returns in GB on Thursday and will also be announcing at that time that we are still unable to publish Northern Ireland donations because of this delay. The plan is to also publish this letter on the website. We would therefore be keen for it to go before then.

If you would like any further information please let Ann or I know.

Regards

[Redacted]

[Redacted]

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 16 November 2017 13:19  
**To:** [REDACTED] Louise Edwards  
**Cc:** [REDACTED] Ann Watt  
**Subject:** RE: NI D and L Action point - for this afternoons meeting

Agree with [REDACTED] Aggregation only works for donations that are already over the £500 threshold – smaller donations do not aggregate to go over the £500, provided as he says that they are genuinely small donations.

Even in the case of say a phone bill that amounts to more than £500 over the course of a year, if it is genuinely paid each month I think our view would be that they are genuinely smaller monthly donations and hence do not count as donations under PPERA.

---

**From:** [REDACTED]  
**Sent:** 16 November 2017 12:35  
**To:** [REDACTED]; Louise Edwards  
**Cc:** [REDACTED]; Ann Watt  
**Subject:** RE: NI D and L Action point - for this afternoons meeting

My thought on this is that as they are incidental expenses (reimbursement for stationery for example) and are not instalments for a larger amount, I don't see how they could be donations as they are under £500.

Intrigued if others have any other thoughts.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 16 November 2017 12:31  
**To:** [REDACTED] Louise Edwards  
**Cc:** [REDACTED]; Ann Watt  
**Subject:** NI D and L Action point - for this afternoons meeting

Hi All,

I'm unable to access the link to action points list for this afternoon's meeting and I want to raise an issue.

We will be writing to parties asking them to give us a breakdown of the individual donations that make up payments under the NI A – Financial assistance to Political Parties Scheme (FAPPS). The letter will also point out that going forward they will need to provide a breakdown of individual payments included in any aggregated amount they are reporting.

FAPPS is paid to parties in two main ways – Salaries – paid 3<sup>rd</sup> last working day of the month (I would expect each of these payments to be over £500) and ad hoc payments – for example to cover mobile phone bills, pay for constituency newsletters – each of these amounts is most likely well below £500.

My question is whether legally any of the smaller donations (

This is a question that I expect will come back to us once we send letters to parties so we will need to have any answer.

I wonder has the Commission received advice on this before?

[REDACTED]

[REDACTED]

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 16 October 2017 13:12  
**To:** [REDACTED]  
**Subject:** RE: NI transparency

We were told that it could be laid on Wednesday but have had no confirmation of that. It has been moved many times though!

We have a media statement ready to go once an announcement is made: [media statement](#)

You should be able to take something out of that for any social media activity

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 16 October 2017 12:01  
**To:** [REDACTED]  
**Subject:** NI transparency

Hi [REDACTED]

There's a rumour we're expecting the NI transparency order sometime this week. Do you have any info about when we're likely to hear about that?

Do you have a line or a release drafted that you can share with me and is there anything you'd like our help with? There's a suggestion that we'd like to do some social media on it, maybe following up our quote from the announcement welcoming it?

Let me know if you have any thoughts,

Cheers,  
[REDACTED]

[REDACTED]  
**Communications Officer**  
The Electoral Commission  
3 Bunhill Row  
London EC1Y 8YZ  
020 7271 [REDACTED]  
Advice and guidance line: 0333 103 1928  
Advice and guidance email: [infoengland@electoralcommission.org.uk](mailto:infoengland@electoralcommission.org.uk)  
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[REDACTED]

---

**From:** Ann Watt  
**Sent:** 09 November 2017 15:13  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: NI Transparency Order

Thanks [REDACTED]

Very disappointing that NIO have not laid the legislation, and the implications for the publication of the Q3 data. We will see tomorrow what explanation [REDACTED] gives for the delay.

My view is that we should put out a strong statement when we publish the GB Q3 data saying how disappointed we are that the Govt has not got the necessary legislation in place. I can't see how we can do otherwise given how important we say transparency is. I also don't want any blame for the delay falling on the Commission.

While I can see the attraction of publishing the Q3 and Q4 data together in February, I am strongly of the view that we should publish the Q3 data as soon as we can, again given how much we have been pushing for transparency. This may of course not be until February or later anyway!

Ann

---

**From:** [REDACTED]  
**Sent:** 06 November 2017 17:02  
**To:** Ann Watt  
**Cc:** [REDACTED]  
**Subject:** NI Transparency Order

Hi Ann

Welcome back from leave. Just a quick update on the Order from me. We have a meeting planned in with [REDACTED] on Friday morning at your office and via video for me. I haven't had any updates from [REDACTED] apart from setting up the meeting and one technical drafting point on coming into force dates, which [REDACTED] Jenny and I think would be better left until we know NIO's thinking about laying the Order.

As the Sept/Oct window for laying the Order has gone by, it won't be possible to publish the GB and NI data for Q3 at the same time. We also don't know if NIO has a new plan for laying the Order. Hopefully [REDACTED] will update us on his thinking on Friday but I wouldn't be surprised if the plans are still quite high-level pending further progress in the NI party talks.

So, I wondered if we should float the idea internally within the Commission, and then informally with NIO, of publishing all the NI data for Q3 and Q4 for the first time together, and at the same time as the GB Q4 data – that would probably be around 20 February.

That would enable all the NI donations/loans data for the second half of 2017 to be published in one set. It would meet the aim of having a historic first publication.

Also, if we publish all the information in one set, it might streamline some of the internal pre-publication work of checking received dates and aggregations (compared to publishing separate batches for Q3 and Q4).

Thanks  
[REDACTED]

---

**From:** Ann Watt  
**Sent:** 27 October 2017 12:15  
**To:** [REDACTED]  
**Subject:** Regs

Hi [REDACTED] – I'm out of the office this afternoon and on leave next week (back on Tues 7<sup>th</sup>).

Just a quick line to ask if you have spoken to [REDACTED] about the impact of delays to the legislation on the timing for the first publication of the NI data. Obviously if the legislation hasn't gone through then we may not be able to publish the NI data alongside the GB Q3 data. While this wouldn't be the end of the world, it could be a bit embarrassing for NIO, and I expect the Commission would say that we were (at least) disappointed with the delay to publication. Has [REDACTED] thought about this potential impact of the regs not being laid soon?

Ann

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 November 2017 14:36  
**To:** [REDACTED] Ann Watt; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Q3 2017 follow up letters

All sent recorded delivery

---

**From:** [REDACTED]  
**Sent:** 24 November 2017 14:25  
**To:** Ann Watt; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Q3 2017 follow up letters

The letters have now been sent. We have given the parties 5 working days to respond.

[REDACTED]

---

**From:** Ann Watt  
**Sent:** 23 November 2017 16:30  
**To:** [REDACTED]  
**Subject:** RE: Q3 2017 follow up letters

Thanks [REDACTED] I am very keen that these letters go out ASAP so that we have the info we need ready for publication.

Ann

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 16:16  
**To:** [REDACTED]  
**Cc:** Ann Watt  
**Subject:** RE: Q3 2017 follow up letters

[REDACTED]

Yes, happy with the first page. I will review the specific pages relevant to each party tomorrow morning.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 22 November 2017 14:20  
**To:** [REDACTED]  
**Cc:** Ann Watt  
**Subject:** Q3 2017 follow up letters

Hi There,

I've amended the first page of the template letter as per [REDACTED] suggestion: you can view it here <http://skynet/dm/Functions/PEFpol/HMG/Confidential%20NI%20donations/Compliance/1%20Nov%202017%20DRAFT%20Donations%20letter.docx>. I also made the amendment to the wording on the declaration on the form as recommended.

I have now completed page 2 and partially filled out the reply form for the following parties :  
[REDACTED]. I've left the date for the response blank at present on each letter.

I found that in most cases I didn't pre-populate the form very much as it would have meant in some cases making assumptions about dates and all the information that was reported to us in Q3 is included on page 2 anyway.

[REDACTED]

You can find the pages 2 and 3 of each of the letters in this folder : n drive – NI Transparency- Q3 2017 follow up letters. Would you be able to review them by the end of next week? – 1 December ?

If all are happy with the letters we could send them out week commencing 4 December .

[REDACTED]

[REDACTED]

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 09 November 2017 12:32  
**To:** [REDACTED]  
**Subject:** RE: Q3 donations and loans publication

Hi [REDACTED]

This was supposed to be the first quarter that information donations from here would have been published but that is now looking unlikely. We have meeting with the NIO tomorrow on this issue and will then decide on how to progress.

There will be an expectation from the media here that something will be published at the same time of GB publication. I don't think we need to send them the GB press release but we may want to issue a statement updating what has happened and our view of it.

I'll lead on this and keep you posted

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 09 November 2017 11:52  
**To:** [REDACTED]  
**Subject:** Q3 donations and loans publication

Hi [REDACTED]

Nice to e-meet you – hope you are well!

I'm just getting in touch about the publication of Q3 donations and loans publication on Thursday 23<sup>rd</sup> November.

Will you be interested in sending this out to NI media? I'll be sure to send over the signed off release and summary to you before 23<sup>rd</sup>, and then see if there is anything you think might be of interest.

Do let me know if this all sounds okay, and if you need anything more from me.

Thanks for your help and best wishes,  
[REDACTED]

[REDACTED]  
**Senior Communications Officer (Media relations)**

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 18 October 2017 10:23  
**To:** [REDACTED] Ann Watt; Bob Posner; Tom Hawthorn; [REDACTED]  
[REDACTED] Louise Edwards; Joanne Crofton-Diggins; [REDACTED] Louise Footner; [REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: NI donations transparency order update CCM:0173402  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello

Just a further update for you all about the NI Transparency Order... which is that unfortunately I don't have a new update since I came back from leave. (In the email below, I mentioned that there had been a possibility of laying the Order today, but I haven't heard anything since, so I think that didn't turn into a runner.)

I presume that NIO are focusing on the bigger picture of NI politics at the moment, and their plans for laying the Order will flow through afterwards.

I've left a message with our NIO contact and am waiting to hear back – and will update you when there's something to share.

In the meantime, [REDACTED] says that we are ready to publish our factsheet, send letters etc if the Order is suddenly laid soon.

Thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 06 October 2017 12:08  
**To:** [REDACTED] Ann Watt; Bob Posner; Tom Hawthorn; [REDACTED]  
[REDACTED] Louise Edwards; Joanne Crofton-Diggins; [REDACTED] Louise Footner; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** Re: NI donations transparency order update CCM:0173402

Hello all

I have another update about the draft Order, which I've already shared with those I've caught around the office/phone.

The Order won't be laid next week. NIO is still making plans but might lay it on or after 18 October.

Depending on timetabling of scrutiny debates, the Order could be made and the parts which allow us to publish could come into force by mid to late November.

Just to give you an idea of what this means - Nearer the time, we can look more closely at the timing of the Order. Then the regulation and NI teams can take a decision about whether it will be possible to publish the Q3 GB and NI data simultaneously or whether the GB data should be published separately first, rather than wait for this Order to allow us to publish the NI data.

█ at NIO knows I'm away next week and will contact Ann or █ if he needs anything on this. I'm back on 16 October.

Thanks

█

Sent from my iPhone

On 4 Oct 2017, at 11:24, █ [@electoralcommission.org.uk](mailto:█@electoralcommission.org.uk) wrote:

Hello all

I have an update on the progress of the draft NI Transparency Order for donations and loans.

The pre-scrutiny with the JSCI lawyers has finished and all the issues have been resolved. █ and I thought of a solution to resolve one of the queries, and apparently NIO and the JSCI lawyers liked it. This is good news because it should mean that it's easier for NIO to make requests for the parliamentary process to be fast-tracked, and should help with getting the Order made and into force faster. Overall, it will help to counteract the delays with getting the Order laid and improve the chances of us being able to publish the first donations information in late Nov/early Dec.

#### Comms for laying of the Order

The Order might be laid next Tuesday or Wednesday. We should hear more about that this week. █ is going to talk to █, our contact at NIO, to compare notes on statements/comms etc (the Commission and NIO are not doing things jointly, but we want to line up our plans so things happen around the same time).

#### Letters between us and NIO

I am waiting to see the final updated copy of the draft Order, and then we can send our letter to conclude the consultation phase and put on record how various issues were resolved. Also, we are still expecting a letter from the Secretary of State to Sir John to conclude the work on the draft Order, and we will need to reply to that letter later in October.

## Implementation

██████████ and others are still doing lots of planning for implementation, which is summarised in this [table](#)

I am on leave from Friday, so either ██████████ or Ann will lead on liaising with NIO next week.

Thanks

██████████

██████████  
**Policy Manager (Lead on regulation of political finance)**

**The Electoral Commission**

Direct telephone: 020 7271 ██████████

Switchboard: 0333 103 1928  
██

---

**From:** ██████████  
**Sent:** 12 September 2017 10:47  
**To:** ██████████ Ann Watt; Bob Posner; Tom Hawthorn; ██████████  
██████████ Louise Edwards; Joanne Crofton-Diggins; ██████████  
██████████ Louise Footner; ██████████ Ben Wilkinson  
**Subject:** RE: NI donations transparency order update CCM:0173402

Hello

I have a voicemail update from NIO that the Order won't be laid this week

The next window for laying it is after the Parl'y conference recess in mid Oct

I will speak to ██████████ at NIO later today and update you further about anything useful that I learn.

It may however be a case of simply waiting a week or so to learn more about the plans for laying in mid October – because at that point NIO may be able to give us a better estimate about how long the Order will take to get through parliamentary process and be made, and come into force.

This change doesn't necessarily change the aim of publishing NI donations/loans information for the first time in late November/early December

Thanks

From: [REDACTED]  
Sent: 11 September 2017 12:30  
To: [REDACTED] Ann Watt; Bob Posner; Tom Hawthorn; [REDACTED]  
[REDACTED] Louise Edwards; Joanne Crofton-Diggins; [REDACTED]  
[REDACTED] Louise Footner; [REDACTED]  
Subject: RE: NI donations transparency order update CCM:0173402

Hello

I have an update from [REDACTED] at NIO.

Apparently it is still possible that the Order will be laid this week (so I misinterpreted the lack of updates on Friday, sorry about that!).

I think that we will hear tomorrow afternoon whether or not it will be laid

The possible laying slot is Wednesday afternoon.

So, [REDACTED] Ann and Bob, it seems sensible to carry on with preparations for responding to the laying of the Order –ie: signing off the factsheet, our statement and website update etc.

Thanks

From: [REDACTED]  
Sent: 11 September 2017 10:11  
To: [REDACTED] Ann Watt; Bob Posner; Tom Hawthorn; [REDACTED]  
[REDACTED]; Joanne Crofton-Diggins; [REDACTED]  
[REDACTED] Louise Footner; [REDACTED]  
Subject: NI donations transparency order update

Hi

Just to let you know that I didn't hear anything from [REDACTED] at NIO on Friday so I think that means that he didn't secure a laying slot for the SI this week.

If that's the case, I think he will now be trying to secure a slot for w/c 16 oct, which is after the party conference recess. At the moment, we can't tell if that would affect our projected publication date of late Nov/early Dec, because that depends on progress of the SI with

committee slots and how quickly it could be made during October and November. It is still possible to 'make' the SI in time for the anticipated publication date but we'll have to see what happens

I'll update you when I hear something from [REDACTED] (and I'll call him today to chase)

Thanks

[REDACTED]

Sent from my iPhone

On 8 Sep 2017, at 15:02, [REDACTED] <[\[REDACTED\]@electoralcommission.org.uk](mailto:[REDACTED]@electoralcommission.org.uk)> wrote:

All bets are off for Monday then.

---

**From:** [REDACTED]  
**Sent:** 08 September 2017 14:59  
**To:** [REDACTED]  
**Subject:** RE: Missed conversation with [REDACTED]

Not yet!!

---

**From:** [REDACTED] <[\[REDACTED\]@electoralcommission.org.uk](mailto:[REDACTED]@electoralcommission.org.uk)>  
**Sent:** 08 September 2017 14:34  
**To:** [REDACTED]  
**Subject:** Missed conversation with [REDACTED]

[REDACTED] [14:32]:  
Any news?

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 October 2017 14:26  
**To:** Ann Watt  
**Subject:** RE: Regs

Hi Ann

No, I tried ringing and sent an email last week and didn't get any reply so I think [REDACTED] must be very busy. I will send another 'hello' email today to ask if he can give us an update, and copy you in

Thanks

[REDACTED]

---

**From:** Ann Watt  
**Sent:** 23 October 2017 12:52  
**To:** [REDACTED]  
**Subject:** Regs

Hi [REDACTED] – any news from NIO on the regs?

Ann

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 12 September 2017 10:47  
**To:** [REDACTED] Ann Watt; Bob Posner; Tom Hawthorn; [REDACTED]  
[REDACTED] Louise Edwards; Joanne Crofton-Diggins; [REDACTED] Louise Footner; [REDACTED] Ben Wilkinson  
**Subject:** RE: NI donations transparency order update CCM:0173402  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello

I have a voicemail update from NIO that the Order won't be laid this week

The next window for laying it is after the Parl'y conference recess in mid Oct

I will speak to [REDACTED] at NIO later today and update you further about anything useful that I learn.

It may however be a case of simply waiting a week or so to learn more about the plans for laying in mid October – because at that point NIO may be able to give us a better estimate about how long the Order will take to get through parliamentary process and be made, and come into force.

This change doesn't necessarily change the aim of publishing NI donations/loans information for the first time in late November/early December

Thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 September 2017 12:30  
**To:** [REDACTED] Ann Watt; Bob Posner; Tom Hawthorn; [REDACTED]  
[REDACTED]; Louise Edwards; Joanne Crofton-Diggins; [REDACTED] Louise Footner; [REDACTED]  
**Subject:** RE: NI donations transparency order update CCM:0173402

Hello

I have an update from [REDACTED] at NIO.

Apparently it is still possible that the Order will be laid this week (so I misinterpreted the lack of updates on Friday, sorry about that!).

I think that we will hear tomorrow afternoon whether or not it will be laid

The possible laying slot is Wednesday afternoon.

So, [REDACTED] Ann and Bob, it seems sensible to carry on with preparations for responding to the laying of the Order –ie: signing off the factsheet, our statement and website update etc.

Thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 September 2017 10:11  
**To:** [REDACTED] Ann Watt; Bob Posner; Tom Hawthorn; [REDACTED]  
[REDACTED] Louise Edwards; Joanne Crofton-Diggins; [REDACTED] Louise Footner; [REDACTED]  
**Subject:** NI donations transparency order update

Hi

Just to let you know that I didn't hear anything from [REDACTED] at NIO on Friday so I think that means that he didn't secure a laying slot for the SI this week.

If that's the case, I think he will now be trying to secure a slot for w/c 16 oct, which is after the party conference recess. At the moment, we can't tell if that would affect our projected publication date of late Nov/early Dec, because that depends on progress of the SI with committee slots and how quickly it could be made during October and November. It is still possible to 'make' the SI in time for the anticipated publication date but we'll have to see what happens

I'll update you when I hear something from [REDACTED] (and I'll call him today to chase)

Thanks

[REDACTED]

Sent from my iPhone

On 8 Sep 2017, at 15:02, [REDACTED] [\[REDACTED\]@electoralcommission.org.uk](mailto:[REDACTED]@electoralcommission.org.uk)> wrote:

All bets are off for Monday then.

---

**From:** [REDACTED]  
**Sent:** 08 September 2017 14:59

**To:** [REDACTED]

**Subject:** RE: Missed conversation with [REDACTED]

Not yet!!

---

**From:** [REDACTED] [\[REDACTED\]@electoralcommission.org.uk](mailto:[REDACTED]@electoralcommission.org.uk)

**Sent:** 08 September 2017 14:34

**To:** [REDACTED]

**Subject:** Missed conversation with [REDACTED]

[REDACTED] 14:32]:

Any news?

[REDACTED]

---

**From:** Claire Bassett  
**Sent:** 10 November 2017 14:50  
**To:** [REDACTED] Ben Wilkinson; Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks all

I agree this has the potential to be a significant story in NI and possibly London as well. I think a fairly strong statement will be needed expressing our disappointment at this not happening given the apparent agreement and readiness of legislation etc. (Although very happy to discuss with NI as Ann [REDACTED] will have a better sense of what needed) I think timing wise we should wait until we would normally be putting a release out about publication for 23<sup>rd</sup> but might want to think about a wider handling plan. For example are we going to do reactive media? This is probably something to discuss and take sounds from [REDACTED] on too

---

**From:** [REDACTED]  
**Sent:** 10 November 2017 14:37  
**To:** Ben Wilkinson; Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Probably worth adding that any such statement will likely get significant coverage here as we will, by default, be the ones announcing the legislation has been delayed.

---

**From:** [REDACTED]  
**Sent:** 10 November 2017 14:35  
**To:** Ben Wilkinson; Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

I think we will need something separate for Northern Ireland (a statement rather than a press release as such) –we don't normally issue the quarterly press releases here so would seem odd to send GB figures on this occasion. Obviously whatever we say in both will be consistent.

[REDACTED]

---

**From:** Ben Wilkinson  
**Sent:** 10 November 2017 14:22  
**To:** Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

I assume the best way to approach this would be for us to include our criticism of the delay in the quote that goes out as part of our Q3 press release, rather than do something separate?

If anyone would favour a different approach, let us know.

– for info

...

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---

**From:** Craig Westwood

**Sent:** 10 November 2017 13:36

**To:** Ann Watt

**Cc:** Executive Team; Louise Edwards;

Ben Wilkinson

**Subject:** RE: Transparency in Northern Ireland - update

Thanks for the update, Ann – disappointing, as you say, and I agree that we should adopt your approach publicly on the 23<sup>rd</sup>.

Do we also need to put a marker down publicly by saying that we expect the transparency commencement date to stay the same, despite the legislative delays? I assume that despite assurances, until we see the final SI there remains a risk that this could shift (and I guess may indeed be the cause of the delay).

Craig

---

**From:** Ann Watt

**Sent:** 10 November 2017 13:31

**To:** Executive Team; Louise Edwards;

Ben Wilkinson

**Subject:** Transparency in Northern Ireland - update

We met this morning with [redacted] Hegarty from NIO. Not good news I'm afraid. The secondary legislation to enable publication of the NI donation and loan data is ready to be laid, but has been delayed. [redacted] did not tell us the reason for the delay. NIO's official line is that "the legislation is still going through internal government clearances".

[redacted] said that this delay could last for some time. On the positive side, he also said that progress could be made quickly at any point. So we should continue to press ahead with our preparations for publication of the first set of data.

We are due to publish the GB Q3 donation and loans data on 23 November, which is when we were expecting to publish the first set of NI data. Unless others disagree, on 23 Nov I think we should put out a strongly worded

statement expressing our disappointment that the necessary legislation has not be laid. Given that the NIO has had to consult the Commission on the draft legislation, we might even say that we know that the legislation has been drafted and from our perspective is ready to be laid in Parliament.

Ann

**Ann Watt**  
**Head of Electoral Commission, Northern Ireland**  
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The Gasworks  
Belfast BT7 2JB  
Tel: 028 9089 [REDACTED]  
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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 27 October 2017 12:34  
**To:** Ann Watt  
**Subject:** RE: Regs

Hi Ann

Thanks for this. I haven't actually spoken to [REDACTED] since I came back from my hol a fortnight ago

I have rung him and sent him emails, and then received the email which he sent to me and you on Tues. He and I have talked a few times about the possibility for not being able to publish the GB and NI Q3 data at the same time. It's still worth going over the points that you mention below now that so much time has elapsed since we thought the Order was finished - so I will try to get him on the phone today.

Thanks  
[REDACTED]

---

**From:** Ann Watt  
**Sent:** 27 October 2017 12:15  
**To:** [REDACTED]  
**Subject:** Regs

Hi [REDACTED] – I'm out of the office this afternoon and on leave next week (back on Tues 7<sup>th</sup>).

Just a quick line to ask if you have spoken to [REDACTED] about the impact of delays to the legislation on the timing for the first publication of the NI data. Obviously if the legislation hasn't gone through then we may not be able to publish the NI data alongside the GB Q3 data. While this wouldn't be the end of the world, it could be a bit embarrassing for NIO, and I expect the Commission would say that we were (at least) disappointed with the delay to publication. Has [REDACTED] thought about this potential impact of the regs not being laid soon?

Ann

[REDACTED]

---

**From:** Ann Watt  
**Sent:** 23 November 2017 13:25  
**To:** Bob Posner; [REDACTED]  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED]  
Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

(For info, Lee Reynolds is a DUP councillor who is the party's representative on the Northern Ireland Assembly Parties Panel, so he is someone we work with often.)

Thanks Bob, I will reply in these terms.

It is a peculiar thing to say given that our statement today said nothing about the DUP.

Obviously I am beyond annoyed by this ridiculous allegation, and the fact that it was sent in this informal manner from an iPhone to [REDACTED]. If the DUP has a real complaint, let's hear it through the proper channels.

But I will stick with Bob's suggestion and express my "disappointment" in more measured terms!

Ann

---

**From:** Bob Posner  
**Sent:** 23 November 2017 13:14  
**To:** [REDACTED]  
**Cc:** Craig Westwood; Claire Bassett; Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks [REDACTED]. I suggest for Ann or you to respond expressing disappointment at their comment as our release of information today is on the usual cycle publication date for such.

Bob.

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 12:42  
**To:** Craig Westwood; Claire Bassett; Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Have just received this email from the DUP:

[REDACTED]

The timing of this is politically dubious only two days before our party conference.

This seems to be developing into a pattern of behaviour by the Electoral Commission ie its release of information about the DUP during the Assembly campaign.

Lee

Sent from my iPhone

We will obviously want to strongly dispute this allegation.

---

**From:** Craig Westwood  
**Sent:** 22 November 2017 15:56  
**To:** Claire Bassett; [REDACTED] Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Agree with Claire and Bob, let's press ahead

---

**From:** Claire Bassett  
**Sent:** 22 November 2017 15:53  
**To:** Cahir Hughes; Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Hi

Interesting times- I agree with Ann. I think we are disappointed to be at point where we are publishing other info without it and that doesn't change if they lay order tomorrow, also letter likely to be out there before long and as sent that can't change it.

If want to soften it we could add something along lines that we look forward to publishing data when order is laid and hope that will be soon...but not sure will help much

thanks

---

**From:** [REDACTED]  
**Sent:** 22 November 2017 15:49  
**To:** Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

All

[REDACTED] has just spoken to [REDACTED] at the NIO who has confirmed that internal clearance has now been given to lay the Order. It is possible that this may happen as soon as tomorrow. However I think, given our experience to date, this is far from guaranteed.

As most of you will know a letter was sent to the Secretary of State from John yesterday:  
[HolmesJ-to-BrokenshireJ-12017-11-21-NI Donations Loans.pdf](#)

We are due to publish our media statement tomorrow at 9:30am expressing our disappointment with the Order not being laid:

<http://skynet/dm/Functions/media/Press%20releases/Media%20statement%20-%20NI%20donations%20and%20loans%20Q3.docx>

I would welcome views on how we now proceed with this in light of this development. These are a few points I think are worth considering:

- It continues to be the case that we are disappointed to not publish NI donations tomorrow as we originally expected. I have already advised a few journalists here that an 'update on donations to Northern Ireland' will be made on 23 November when we publish this

information for GB parties. To my knowledge nobody is expecting us to announce it has been delayed.

- We could take the sting out of the press release tomorrow by acknowledging that legislation may now be imminent. However I don't think any of us can be fully satisfied that this will be the case and it could undermine us if there are further delays.
- If we keep the press release as is and the NIO do lay Order tomorrow they may say we are being 'unreasonable' as they advised us that it would be laid. (One could argue though that they only did so because of our letter to the SoS).
- Given the likely media interest in this issue I had committed to providing an advance copy of the press release to [REDACTED] at the NIO today. He hasn't asked me for it yet but thought it worth flagging.

Its Anns non-working day today but I have spoken to her and she is of the view that we press ahead with our original plan. She is not convinced that an Order will be laid in Parliament by 9:30am tomorrow morning and our statement reflects our continued position.

[REDACTED]

---

**From:** Ann Watt  
**Sent:** 10 November 2017 13:31  
**To:** Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson  
**Subject:** Transparency in Northern Ireland - update

We met this morning with [REDACTED] from NIO. Not good news I'm afraid. The secondary legislation to enable publication of the NI donation and loan data is ready to be laid, but has been delayed. [REDACTED] did not tell us the reason for the delay. NIO's official line is that "the legislation is still going through internal government clearances".

[REDACTED] said that this delay could last for some time. On the positive side, he also said that progress could be made quickly at any point. So we should continue to press ahead with our preparations for publication of the first set of data.

We are due to publish the GB Q3 donation and loans data on 23 November, which is when we were expecting to publish the first set of NI data. Unless others disagree, on 23 Nov I think we should put out a strongly worded statement expressing our disappointment that the necessary legislation has not be laid. Given that the NIO has had to consult the Commission on the draft legislation, we might even say that we know that the legislation has been drafted and from our perspective is ready to be laid in Parliament.

Ann

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**Head of Electoral Commission, Northern Ireland**  
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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 10 November 2017 14:37  
**To:** Ben Wilkinson; Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Probably worth adding that any such statement will likely get significant coverage here as we will, by default, be the ones announcing the legislation has been delayed.

---

**From:** Cahir Hughes  
**Sent:** 10 November 2017 14:35  
**To:** Ben Wilkinson; Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

I think we will need something separate for Northern Ireland (a statement rather than a press release as such) –we don't normally issue the quarterly press releases here so would seem odd to send GB figures on this occasion. Obviously whatever we say in both will be consistent.

[REDACTED]

---

**From:** Ben Wilkinson  
**Sent:** 10 November 2017 14:22  
**To:** Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

I assume the best way to approach this would be for us to include our criticism of the delay in the quote that goes out as part of our Q3 press release, rather than do something separate?

If anyone would favour a different approach, let us know.

[REDACTED] – for info

...  
**Ben Wilkinson**  
**Head of External Communications**  
The Electoral Commission  
3 Bunhill Row  
London EC1Y 8YZ  
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---

**From:** Craig Westwood  
**Sent:** 10 November 2017 13:36  
**To:** Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks for the update, Ann – disappointing, as you say, and I agree that we should adopt your approach publicly on the 23<sup>rd</sup>.

Do we also need to put a marker down publicly by saying that we expect the transparency commencement date to stay the same, despite the legislative delays? I assume that despite assurances, until we see the final SI there remains a risk that this could shift (and I guess may indeed be the cause of the delay).

Craig

---

**From:** Ann Watt  
**Sent:** 10 November 2017 13:31  
**To:** Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson  
**Subject:** Transparency in Northern Ireland - update

We met this morning with [REDACTED] from NIO. Not good news I'm afraid. The secondary legislation to enable publication of the NI donation and loan data is ready to be laid, but has been delayed. [REDACTED] did not tell us the reason for the delay. NIO's official line is that "the legislation is still going through internal government clearances".

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Ann

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[REDACTED]

---

**From:** Ann Watt  
**Sent:** 14 November 2017 12:20  
**To:** [REDACTED] Bob Posner [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks all

---

**From:** [REDACTED]  
**Sent:** 14 November 2017 12:19  
**To:** Bob Posner; Ann Watt; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

☺ We are all at one – very much agree that the Commission’s statement should not open up a can of worms.

---

**From:** Bob Posner  
**Sent:** 14 November 2017 12:06  
**To:** Ann Watt; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

I agree. That looks the right line to take.

Bob.

---

**From:** Ann Watt  
**Sent:** 14 November 2017 12:01  
**To:** [REDACTED]; Bob Posner; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

(Shortened cc list to spare everyone the detail)

Thanks [REDACTED] for this. You make an important point about the legislation needing to be in force before we publish, so we will amend accordingly.

[REDACTED] and I discussed what we say about the legislation being “ready”. (It is important that we make this point in the press statement because we don’t want the delay to be interpreted as just being about drafting problems.) Bob’s comment is that we should be crystal clear and authoritative.

In the Commission’s view the legislation is ready to be laid. There is one small technical point that NIO have suggested is still outstanding. We do not see the need to open this can of worms. (Worth also noting here that some small timing aspects of the current draft legislation will need to be re-visited if the legislation is not laid soon, but that’s for another day.)

So after our discussion [REDACTED] and I think that the best line on this point is “**In our view the legislation is ready to be laid in Parliament**”. We can only speak for the Commission after all, so we think this is as clear as we can be.

Ann

---

**From:** [REDACTED]  
**Sent:** 14 November 2017 10:12  
**To:** Claire Bassett; [REDACTED] Ben Wilkinson; Bob Posner; Craig Westwood; Ann Watt  
**Cc:** Ailsa Irvine; Louise Edwards; [REDACTED]; [REDACTED];  
[REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update  
**Importance:** High

All

I am not absolutely sure without checking latest communications [REDACTED] has had that the legislation is absolutely ready to lay – and in any event something could happen that might affect the drafting , so I agree with Claire that our statement should be tempered accordingly. Also, please be aware that there can be **no disclosure of NI donations and loans etc until such time as the legislation is actually in force**. The legislation is an Order made by a statutory instrument which is subject to an affirmative Parliamentary procedure. This means that before it can come into force, the Order has to be laid, debated by and then if passed, made (i.e. signed by the appropriate Minister. The latest draft of the Order I have seen (24 October draft) provides for most of the Order to come into force on the day after the day on which it is made, with the articles which make provision relating to regulated donees coming into force on the 21<sup>st</sup> day after the day on which the Order is made. I will suggest tweaks to the proposed statement to reflect this.

---

**From:** Claire Bassett  
**Sent:** 14 November 2017 08:47  
**To:** [REDACTED] Ben Wilkinson; Bob Posner; Craig Westwood; Ann Watt  
**Cc:** Ailsa Irvine; Louise Edwards; [REDACTED]  
[REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks

Couple tweaks and thoughts from me- main one is about whether we know for a fact that the legislation is ready to lay and whether it would be better to preface with “We understand...” or, slightly stronger, “We have seen legislation ready...”?

Thanks

Claire

---

**From:** [REDACTED]  
**Sent:** 13 November 2017 15:45  
**To:** Claire Bassett; Ben Wilkinson; Bob Posner; Craig Westwood; Ann Watt  
**Cc:** Ailsa Irvine; Louise Edwards; [REDACTED]  
[REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

All

Proposed statement on delay of donations legislation in  
NI: <http://skynet/dm/Functions/media/Press%20releases/Media%20statement%20-%20NI%20donations%20and%20loans%20Q3.docx>

Grateful for thoughts on this approach and the content.

Thanks

---

**From:** Claire Bassett  
**Sent:** 10 November 2017 14:50  
**To:** [REDACTED] Ben Wilkinson; Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; John Franks; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks all

I agree this has the potential to be a significant story in NI and possibly London as well. I think a fairly strong statement will be needed expressing our disappointment at this not happening given the apparent agreement and readiness of legislation etc. (Although very happy to discuss with NI as Ann [REDACTED] will have a better sense of what needed) I think timing wise we should wait until we would normally be putting a release out about publication for 23<sup>rd</sup> but might want to think about a wider handling plan. For example are we going to do reactive media? This is probably something to discuss and take sounds from John on too

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**To:** Ben Wilkinson; Craig Westwood; Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

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– for info

...

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**Head of External Communications**

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**Sent:** 10 November 2017 13:36  
**To:** Ann Watt  
**Cc:** Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson  
**Subject:** RE: Transparency in Northern Ireland - update

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Craig

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**Sent:** 10 November 2017 13:31  
**To:** Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson  
**Subject:** Transparency in Northern Ireland - update

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statement expressing our disappointment that the necessary legislation has not be laid. Given that the NIO has had to consult the Commission on the draft legislation, we might even say that we know that the legislation has been drafted and from our perspective is ready to be laid in Parliament.

Ann

**Ann Watt**  
**Head of Electoral Commission, Northern Ireland**  
Ground Floor, 4 Cromac Place  
The Gasworks  
Belfast BT7 2JB  
Tel: 028 9089 [REDACTED]  
Fax: 028 9031 4827  
Textphone: 18001 028 9089 4021

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[www.aboutmyvote.co.uk](http://www.aboutmyvote.co.uk)

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[REDACTED]

---

**From:** Craig Westwood  
**Sent:** 22 November 2017 15:56  
**To:** Claire Bassett; [REDACTED] Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Agree with Claire and Bob, let's press ahead

---

**From:** Claire Bassett  
**Sent:** 22 November 2017 15:53  
**To:** [REDACTED] Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Hi

Interesting times- I agree with Ann. I think we are disappointed to be at point where we are publishing other info without it and that doesn't change if they lay order tomorrow, also letter likely to be out there before long and as sent that can't change it.

If want to soften it we could add something along lines that we look forward to publishing data when order is laid and hope that will be soon...but not sure will help much

thanks

---

**From:** [REDACTED]  
**Sent:** 22 November 2017 15:49  
**To:** Ann Watt; Executive Team; Louise Edwards; [REDACTED];  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

All

[REDACTED] has just spoken to [REDACTED] at the NIO who has confirmed that internal clearance has now been given to lay the Order. It is possible that this may happen as soon as tomorrow. However I think, given our experience to date, this is far from guaranteed.

As most of you will know a letter was sent to the Secretary of State from John yesterday:  
[HolmesJ-to-BrokenshireJ-12017-11-21-NI Donations Loans.pdf](#)

We are due to publish our media statement tomorrow at 9:30am expressing our disappointment with the Order not being laid:  
<http://skynet/dm/Functions/media/Press%20releases/Media%20statement%20-%20NI%20donations%20and%20loans%20Q3.docx>

I would welcome views on how we now proceed with this in light of this development. These are a few points I think are worth considering:

- It continues to be the case that we are disappointed to not publish NI donations tomorrow as we originally expected. I have already advised a few journalists here that an 'update on donations to Northern Ireland' will be made on 23 November when we publish this information for GB parties. To my knowledge nobody is expecting us to announce it has been delayed.
- We could take the sting out of the press release tomorrow by acknowledging that legislation may now be imminent. However I don't think any of us can be fully satisfied that this will be the case and it could undermine us if there are further delays.
- If we keep the press release as is and the NIO do lay Order tomorrow they may say we are being 'unreasonable' as they advised us that it would be laid. (One could argue though that they only did so because of our letter to the SoS).
- Given the likely media interest in this issue I had committed to providing an advance copy of the press release to [REDACTED] at the NIO today. He hasn't asked me for it yet but thought it worth flagging.

Its Anns non-working day today but I have spoken to her and she is of the view that we press ahead with our original plan. She is not convinced that an Order will be laid in Parliament by 9:30am tomorrow morning and our statement reflects our continued position.

---

**From:** Ann Watt  
**Sent:** 10 November 2017 13:31  
**To:** Executive Team; Louise Edwards; [REDACTED]  
 [REDACTED]; Ben Wilkinson  
**Subject:** Transparency in Northern Ireland - update

We met this morning with [REDACTED] from NIO. Not good news I'm afraid. The secondary legislation to enable publication of the NI donation and loan data is ready to be laid, but has been delayed. [REDACTED] did not tell us the reason for the delay. NIO's official line is that "the legislation is still going through internal government clearances".

[REDACTED] said that this delay could last for some time. On the positive side, he also said that progress could be made quickly at any point. So we should continue to press ahead with our preparations for publication of the first set of data.

We are due to publish the GB Q3 donation and loans data on 23 November, which is when we were expecting to publish the first set of NI data. Unless others disagree, on 23 Nov I think we should put out a strongly worded statement expressing our disappointment that the necessary legislation has not be laid. Given that the NIO has had to consult the Commission on the draft legislation, we might even say that we know that the legislation has been drafted and from our perspective is ready to be laid in Parliament.

Ann

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**Head of Electoral Commission, Northern Ireland**  
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 Please consider the environment before printing this email.

[REDACTED]

---

**From:** Ann Watt  
**Sent:** 23 November 2017 18:06  
**To:** [REDACTED] Craig Westwood; Bob Posner  
**Cc:** Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
[REDACTED] Tom Hawthorn  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks [REDACTED] and thanks to everyone for all the work in the last few days on transparency in Northern Ireland. A particular thank you to [REDACTED] who has done an excellent job handling a huge number of questions and requests from the media.

In terms of when we publish the Q3 Northern Ireland data, my view is that we should publish it the day after the legislation comes into force. I note [REDACTED] comments that this may be mid January, so I think we should publish then. The alternative would be to wait until late Feb when we publish the Q4 GB data. Given how much we have spoken out about delays today, I feel strongly that we should publish the data as soon as we can, rather than keeping to our regular donation and loan publication timetable. We would then publish the Q4 NI data alongside the GB data in late Feb.

So all of this emphasises the importance of completing all the outstanding actions needed to prepare for publication of the data, which I understand are all due to be done by the next implementation group meeting on Thurs 30th.

Ann

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 17:52  
**To:** [REDACTED] Craig Westwood; Ann Watt; Bob Posner  
**Cc:** Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED] Tom Hawthorn  
**Subject:** RE: Transparency in Northern Ireland - update

Hello all

It's good news that [the Transparency Order](#) has been laid before Parliament today and [the NIO has also published it](#). It's an important milestone because we first started working on a consultation on a draft Order in January 2014. ([REDACTED] will be sending around details of links to published guidance etc tomorrow.)

[REDACTED], our contact at the NIO, has talked me through what happens next with the Order and here is [a flowchart](#) showing my understanding of the stages. Some key points:

- It is an affirmative Order so it has to go through three stages of consideration/debate before it can be 'made'. The Order can't be amended, but it has to be approved at each stage.
- The Order won't be automatically 'made' after those three stages – the Secretary of state has discretion on when they formally 'make' it. It comes into force one day after it is 'made', and the Commission is only allowed to disclose information about NI donations/loans when the Order has come into force.

In our press statement today, we have said we hope to be able to publish early in the New Year. Just to help with internal expectations and planning – it is possible that the Order will be in force by mid-January, or it is possible that it won't happen until later in January or even in February or later. As a minimum, we will want it to be in force by late February so that we can publish Q4 reports for GB and NI at the same time.

Hopefully Ann and I can get an update from NIO or Parliamentary authorities next week about the scheduling of debates. When we know more, we could discuss at a future external issues meeting whether and when the Commission could look at issuing briefings/letters in support of the Order.

Thanks

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 16:36  
**To:** Craig Westwood; Ann Watt; Bob Posner  
**Cc:** Claire Bassett; Executive Team; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Ann has approved this so issuing to NI media now

Thanks

---

**From:** Craig Westwood  
**Sent:** 23 November 2017 15:47  
**To:** [REDACTED] Ann Watt; Bob Posner  
**Cc:** Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

This makes it sound like either 1) we think the government has acted in response to our statement this morning, or 2) the govt has acted quickly in all things on this issue. Tell me if I'm wrong, but I don't think we want to imply either of those things.

Suggested version below which focuses on why this matters – have also suggested saying 'begin publishing' as it's good to emphasise that this isn't a one-off :

"We are pleased that the UK Government has acted to make this important change a reality. Transparency in how our political parties are funded is key to ensuring public trust and confidence in the democratic process. We hope to be able to begin publishing this information early in the New Year."

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 15:32  
**To:** Ann Watt; Bob Posner  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Small but important change suggested by [REDACTED] – Given that announcement is now imminent from NIO I would be keen to get a quick signoff on the below if possible

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 15:20

**To:** Ann Watt; Bob Posner

**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Increasing speculation now that the Order will be laid this afternoon in Parliament.

In such an event I don't think a long winded press release is necessary given how events have unfolded today. I would suggest we send the following:

**In response to the Secretary of State's announcement that legislation has now been laid in Parliament Ann Watt, Head of the Electoral Commission in Northern Ireland said:**

"We are pleased that the UK Government has acted quickly to lay this Order in Parliament today. Once it comes into force we will be able to publish important information on how political parties in Northern Ireland are funded. We ~~now expect to hope~~ to be able to publish ~~the information we had hoped to publish today early~~ this information in the New Year."

Grateful for thoughts on this approach.

---

**From:** Ann Watt

**Sent:** 23 November 2017 13:25

**To:** Bob Posner; [REDACTED]

**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

(For info, Lee Reynolds is a DUP councillor who is the party's representative on the Northern Ireland Assembly Parties Panel, so he is someone we work with often.)

Thanks Bob, I will reply in these terms.

It is a peculiar thing to say given that our statement today said nothing about the DUP.

Obviously I am beyond annoyed by this ridiculous allegation, and the fact that it was sent in this informal manner from an iPhone to [REDACTED]. If the DUP has a real complaint, let's hear it through the proper channels.

But I will stick with Bob's suggestion and express my "disappointment" in more measured terms!

Ann

---

**From:** Bob Posner

**Sent:** 23 November 2017 13:14

**To:** [REDACTED]

**Cc:** Craig Westwood; Claire Bassett; Ann Watt; Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Thanks [REDACTED]. I suggest for Ann or you to respond expressing disappointment at their comment as our release of information today is on the usual cycle publication date for such.

Bob.

---

**From:** [REDACTED]

**Sent:** 23 November 2017 12:42

**To:** Craig Westwood; Claire Bassett; Ann Watt; Executive Team; Louise Edwards; [REDACTED]

Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Have just received this email from the DUP:

[REDACTED]

The timing of this is politically dubious only two days before our party conference.

This seems to be developing into a pattern of behaviour by the Electoral Commission ie its release of information about the DUP during the Assembly campaign.

Lee

Sent from my iPhone

We will obviously want to strongly dispute this allegation.

[REDACTED]

---

**From:** Craig Westwood

**Sent:** 22 November 2017 15:56

**To:** Claire Bassett; [REDACTED] Ann Watt; Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Agree with Claire and Bob, let's press ahead

---

**From:** Claire Bassett

**Sent:** 22 November 2017 15:53

**To:** [REDACTED] Ann Watt; Executive Team; Louise Edwards; John Franks; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Hi

Interesting times- I agree with Ann. I think we are disappointed to be at point where we are publishing other info without it and that doesnt change if they lay order tomorrow, also letter likely to be out there before long and as sent that cant change it.

If want to soften it we could add something along lines that we look forward to publishing data when order is laid and hope that will be soon...but not sure will help much

thanks

---

**From:** [REDACTED]

**Sent:** 22 November 2017 15:49

**To:** Ann Watt; Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

All

[REDACTED] has just spoken to [REDACTED] at the NIO who has confirmed that internal clearance has now been given to lay the Order. It is possible that this may happen as soon as tomorrow. However I think, given our experience to date, this is far from guaranteed.

As most of you will know a letter was sent to the Secretary of State from John yesterday:  
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We are due to publish our media statement tomorrow at 9:30am expressing our disappointment with the Order not being laid:

<http://skynet/dm/Functions/media/Press%20releases/Media%20statement%20-%20NI%20donations%20and%20loans%20Q3.docx>

I would welcome views on how we now proceed with this in light of this development. These are a few points I think are worth considering:

- It continues to be the case that we are disappointed to not publish NI donations tomorrow as we originally expected. I have already advised a few journalists here that an 'update on donations to Northern Ireland' will be made on 23 November when we publish this information for GB parties. To my knowledge nobody is expecting us to announce it has been delayed.
- We could take the sting out of the press release tomorrow by acknowledging that legislation may now be imminent. However I don't think any of us can be fully satisfied that this will be the case and it could undermine us if there are further delays.
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- Given the likely media interest in this issue I had committed to providing an advance copy of the press release to [REDACTED] at the NIO today. He hasn't asked me for it yet but thought it worth flagging.

Its Anns non-working day today but I have spoken to her and she is of the view that we press ahead with our original plan. She is not convinced that an Order will be laid in Parliament by 9:30am tomorrow morning and our statement reflects our continued position.

[REDACTED]

---

**From:** Ann Watt

**Sent:** 10 November 2017 13:31

**To:** Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson

**Subject:** Transparency in Northern Ireland - update

We met this morning with [REDACTED] from NIO. Not good news I'm afraid. The secondary legislation to enable publication of the NI donation and loan data is ready to be laid, but has been delayed. [REDACTED] did not tell us the reason for the delay. NIO's official line is that "the legislation is still going through internal government clearances".

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Ann

**Ann Watt**

**Head of Electoral Commission, Northern Ireland**

Ground Floor, 4 Cromac Place

The Gasworks

Belfast BT7 2JB

Tel: 028 9089 [REDACTED]

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 November 2017 16:23  
**To:** Louise Edwards; [REDACTED] Ann Watt; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

[REDACTED]  
A couple of comments added.  
Thanks  
[REDACTED]

---

**From:** Louise Edwards  
**Sent:** 28 November 2017 08:21  
**To:** [REDACTED] Ann Watt; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks [REDACTED] No comments from me on the QMS which looks good. When we come to fill in the dates, I would ideally want two working days between data being uploaded into PFR Online and publication, so that we can perform checks and be absolutely certain on figures for the press release.

Thanks

Louise

---

**From:** [REDACTED]  
**Sent:** 24 November 2017 17:06  
**To:** Ann Watt; [REDACTED] Louise Edwards; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

All,

Please see re-drafted interim QMS for Q3 and Q4 publication process for NI donations and loans:  
<http://skynet/dm/Functions/PEFpol/HMG/Confidential NI donations/Compliance/PFR NI Q3 and reg donee handling plan.docx>

For Q3, we are current at stage 6 on the process. You may also notice your name next to some of the actions.

Issues that have been addressed on the draft:

- Added an action for Louise and Ann to sign-off final list of publishable and non-publishable donations and loans once compliance have filtered these – [REDACTED] has updated Scheme of Delegation
- Permissibility checking incorporated into QMS

If anyone has any comments, amendments or insertions, please put them into the link above.

Thanks  
[REDACTED]

---

**From:** Ann Watt  
**Sent:** 23 November 2017 18:06  
**To:** [REDACTED] Craig Westwood; Bob Posner  
**Cc:** Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED] Tom Hawthorn  
**Subject:** RE: Transparency in Northern Ireland - update

Thanks [REDACTED] and thanks to everyone for all the work in the last few days on transparency in Northern Ireland. A particular thank you to [REDACTED] who has done an excellent job handling a huge number of questions and requests from the media.

In terms of when we publish the Q3 Northern Ireland data, my view is that we should publish it the day after the legislation comes into force. I note [REDACTED] comments that this may be mid January, so I think we should publish then. The alternative would be to wait until late Feb when we publish the Q4 GB data. Given how much we have spoken out about delays today, I feel strongly that we should publish the data as soon as we can, rather than keeping to our regular donation and loan publication timetable. We would then publish the Q4 NI data alongside the GB data in late Feb.

So all of this emphasises the importance of completing all the outstanding actions needed to prepare for publication of the data, which I understand are all due to be done by the next implementation group meeting on Thurs 30th.

Ann

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 17:52  
**To:** [REDACTED] Craig Westwood; Ann Watt; Bob Posner  
**Cc:** Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED] Tom Hawthorn  
**Subject:** RE: Transparency in Northern Ireland - update

Hello all

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[REDACTED], our contact at the NIO, has talked me through what happens next with the Order and here is [a flowchart](#) showing my understanding of the stages. Some key points:

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Hopefully Ann and I can get an update from NIO or Parliamentary authorities next week about the scheduling of debates. When we know more, we could discuss at a future external issues meeting whether and when the Commission could look at issuing briefings/letters in support of the Order.

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**From:** [REDACTED]  
**Sent:** 23 November 2017 16:36  
**To:** Craig Westwood; Ann Watt; Bob Posner  
**Cc:** Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Ann has approved this so issuing to NI media now

Thanks

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**From:** Craig Westwood  
**Sent:** 23 November 2017 15:47  
**To:** [REDACTED] Ann Watt; Bob Posner  
**Cc:** Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

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---

**From:** [REDACTED]  
**Sent:** 23 November 2017 15:32  
**To:** Ann Watt; Bob Posner  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Small but important change suggested by [REDACTED] – Given that announcement is now imminent from NIO I would be keen to get a quick signoff on the below if possible

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**From:** [REDACTED]  
**Sent:** 23 November 2017 15:20  
**To:** Ann Watt; Bob Posner  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Increasing speculation now that the Order will be laid this afternoon in Parliament.

In such an event I don't think a long winded press release is necessary given how events have unfolded today. I would suggest we send the following:

**In response to the Secretary of State's announcement that legislation has now been laid in Parliament Ann Watt, Head of the Electoral Commission in Northern Ireland said:**

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Grateful for thoughts on this approach.

[REDACTED]

---

**From:** Ann Watt

**Sent:** 23 November 2017 13:25

**To:** Bob Posner; [REDACTED]

**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

(For info, Lee Reynolds is a DUP councillor who is the party's representative on the Northern Ireland Assembly Parties Panel, so he is someone we work with often.)

Thanks Bob, I will reply in these terms.

It is a peculiar thing to say given that our statement today said nothing about the DUP.

Obviously I am beyond annoyed by this ridiculous allegation, and the fact that it was sent in this informal manner from an iPhone to [REDACTED]. If the DUP has a real complaint, let's hear it through the proper channels.

But I will stick with Bob's suggestion and express my "disappointment" in more measured terms!

Ann

---

**From:** Bob Posner

**Sent:** 23 November 2017 13:14

**To:** [REDACTED]

**Cc:** Craig Westwood; Claire Bassett; Ann Watt; Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Thanks [REDACTED] I suggest for Ann or you to respond expressing disappointment at their comment as our release of information today is on the usual cycle publication date for such.

Bob.

---

**From:** [REDACTED]

**Sent:** 23 November 2017 12:42

**To:** Craig Westwood; Claire Bassett; Ann Watt; Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Have just received this email from the DUP:

[REDACTED]

The timing of this is politically dubious only two days before our party conference.

This seems to be developing into a pattern of behaviour by the Electoral Commission ie its release of information about the DUP during the Assembly campaign.

Lee

Sent from my iPhone

We will obviously want to strongly dispute this allegation.

[REDACTED]

---

**From:** Craig Westwood  
**Sent:** 22 November 2017 15:56  
**To:** Claire Bassett; [REDACTED] Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Agree with Claire and Bob, let's press ahead

---

**From:** Claire Bassett  
**Sent:** 22 November 2017 15:53  
**To:** [REDACTED] Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Hi

Interesting times- I agree with Ann. I think we are disappointed to be at point where we are publishing other info without it and that doesnt change if they lay order tomorrow, also letter likely to be out there before long and as sent that cant change it.

If want to soften it we could add something along lines that we look forward to publishing data when order is laid and hope that will be soon...but not sure will help much

thanks

---

**From:** [REDACTED]  
**Sent:** 22 November 2017 15:49  
**To:** Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

All

[REDACTED] has just spoken to [REDACTED] at the NIO who has confirmed that internal clearance has now been given to lay the Order. It is possible that this may happen as soon as tomorrow. However I think, given our experience to date, this is far from guaranteed.

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<http://skynet/dm/Functions/media/Press%20releases/Media%20statement%20-%20NI%20donations%20and%20loans%20Q3.docx>

I would welcome views on how we now proceed with this in light of this development. These are a few points I think are worth considering:

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[REDACTED]

---

**From:** Ann Watt

**Sent:** 10 November 2017 13:31

**To:** Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson

**Subject:** Transparency in Northern Ireland - update

We met this morning with [REDACTED] from NIO. Not good news I'm afraid. The secondary legislation to enable publication of the NI donation and loan data is ready to be laid, but has been delayed. [REDACTED] did not tell us the reason for the delay. NIO's official line is that "the legislation is still going through internal government clearances".

[REDACTED] said that this delay could last for some time. On the positive side, he also said that progress could be made quickly at any point. So we should continue to press ahead with our preparations for publication of the first set of data.

We are due to publish the GB Q3 donation and loans data on 23 November, which is when we were expecting to publish the first set of NI data. Unless others disagree, on 23 Nov I think we should put out a strongly worded statement expressing our disappointment that the necessary legislation has not be laid. Given that the NIO has had to consult the Commission on the draft legislation, we might even say that we know that the legislation has been drafted and from our perspective is ready to be laid in Parliament.

Ann

**Ann Watt**  
**Head of Electoral Commission, Northern Ireland**  
Ground Floor, 4 Cromac Place

The Gasworks  
Belfast BT7 2JB  
Tel: 028 9089 [REDACTED]  
Fax: 028 9031 4827  
Textphone: 18001 028 9089 4021

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[www.aboutmyvote.co.uk](http://www.aboutmyvote.co.uk)

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 15:34  
**To:** [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

[REDACTED]

I would also question the phrase 'New Year'. Depending on how you define it, it could mean the first few days of January by which time the Order may not have come into force.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 15:32  
**To:** Ann Watt; Bob Posner  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Small but important change suggested by [REDACTED] – Given that announcement is now imminent from NIO I would be keen to get a quick signoff on the below if possible

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**From:** [REDACTED]  
**Sent:** 23 November 2017 15:20  
**To:** Ann Watt; Bob Posner  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Increasing speculation now that the Order will be laid this afternoon in Parliament.

In such an event I don't think a long winded press release is necessary given how events have unfolded today. I would suggest we send the following:

**In response to the Secretary of State's announcement that legislation has now been laid in Parliament Ann Watt, Head of the Electoral Commission in Northern Ireland said:**

"We are pleased that the UK Government has acted quickly to lay this Order in Parliament today. Once it comes into force we will be able to publish important information on how political parties in Northern Ireland are funded. We ~~now expect to hope to~~ be able to publish ~~the information we had hoped to publish today early~~ this information in the New Year."

Grateful for thoughts on this approach.

[REDACTED]

---

**From:** Ann Watt  
**Sent:** 23 November 2017 13:25  
**To:** Bob Posner; [REDACTED]  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

(For info, Lee Reynolds is a DUP councillor who is the party's representative on the Northern Ireland Assembly Parties Panel, so he is someone we work with often.)

Thanks Bob, I will reply in these terms.

It is a peculiar thing to say given that our statement today said nothing about the DUP.

Obviously I am beyond annoyed by this ridiculous allegation, and the fact that it was sent in this informal manner from an iPhone to [REDACTED]. If the DUP has a real complaint, let's hear it through the proper channels.

But I will stick with Bob's suggestion and express my "disappointment" in more measured terms!

Ann

---

**From:** Bob Posner

**Sent:** 23 November 2017 13:14

**To:** [REDACTED]

**Cc:** Craig Westwood; Claire Bassett; Ann Watt; Executive Team; Louise Edwards; [REDACTED]

Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Thanks [REDACTED] I suggest for Ann or you to respond expressing disappointment at their comment as our release of information today is on the usual cycle publication date for such.

Bob.

---

**From:** [REDACTED]

**Sent:** 23 November 2017 12:42

**To:** Craig Westwood; Claire Bassett; Ann Watt; Executive Team; Louise Edwards; John Franks; Umar Hanif; Robin Morris; Martin Carr; Roisin McDaid; Kate Engles; Jane Draper; Ben Wilkinson; Victoria Bishop-Rowe

**Subject:** RE: Transparency in Northern Ireland - update

Have just received this email from the DUP:

[REDACTED]

The timing of this is politically dubious only two days before our party conference.

This seems to be developing into a pattern of behaviour by the Electoral Commission ie its release of information about the DUP during the Assembly campaign.

Lee

Sent from my iPhone

We will obviously want to strongly dispute this allegation.

[REDACTED]

---

**From:** Craig Westwood

**Sent:** 22 November 2017 15:56

**To:** Claire Bassett; [REDACTED]; Ann Watt; Executive Team; Louise Edwards; [REDACTED]

Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Agree with Claire and Bob, let's press ahead

---

**From:** Claire Bassett  
**Sent:** 22 November 2017 15:53  
**To:** [REDACTED] Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Hi

Interesting times- I agree with Ann. I think we are disappointed to be at point where we are publishing other info without it and that doesn't change if they lay order tomorrow, also letter likely to be out there before long and as sent that can't change it.

If want to soften it we could add something along lines that we look forward to publishing data when order is laid and hope that will be soon...but not sure will help much

thanks

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**From:** [REDACTED]  
**Sent:** 22 November 2017 15:49  
**To:** Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

All

[REDACTED] has just spoken to [REDACTED] at the NIO who has confirmed that internal clearance has now been given to lay the Order. It is possible that this may happen as soon as tomorrow. However I think, given our experience to date, this is far from guaranteed.

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I would welcome views on how we now proceed with this in light of this development. These are a few points I think are worth considering:

- It continues to be the case that we are disappointed to not publish NI donations tomorrow as we originally expected. I have already advised a few journalists here that an 'update on donations to Northern Ireland' will be made on 23 November when we publish this information for GB parties. To my knowledge nobody is expecting us to announce it has been delayed.
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- Given the likely media interest in this issue I had committed to providing an advance copy of the press release to [REDACTED] at the NIO today. He hasn't asked me for it yet but thought it worth flagging.

Its Anns non-working day today but I have spoken to her and she is of the view that we press ahead with our original plan. She is not convinced that an Order will be laid in Parliament by 9:30am tomorrow morning and our statement reflects our continued position.

**From:** Ann Watt  
**Sent:** 10 November 2017 13:31  
**To:** Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson  
**Subject:** Transparency in Northern Ireland - update

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[REDACTED] said that this delay could last for some time. On the positive side, he also said that progress could be made quickly at any point. So we should continue to press ahead with our preparations for publication of the first set of data.

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Ann

**Ann Watt**  
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[REDACTED]

---

**From:** Ann Watt  
**Sent:** 23 November 2017 15:42  
**To:** [REDACTED] Bob Posner  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED]  
Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Please can we say "early in the New Year"

We must be ready to publish the information as soon as the Order comes into force, after all the complaining we have done today about delays!

Otherwise I am happy with the statement.

Ann

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 15:32  
**To:** Ann Watt; Bob Posner  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Small but important change suggested by [REDACTED] – Given that announcement is now imminent from NIO I would be keen to get a quick signoff on the below if possible

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**Sent:** 23 November 2017 15:20  
**To:** Ann Watt; Bob Posner  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

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Grateful for thoughts on this approach.

[REDACTED]

---

**From:** Ann Watt  
**Sent:** 23 November 2017 13:25

**To:** Bob Posner; [REDACTED]  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

(For info, Lee Reynolds is a DUP councillor who is the party's representative on the Northern Ireland Assembly Parties Panel, so he is someone we work with often.)

Thanks Bob, I will reply in these terms.

It is a peculiar thing to say given that our statement today said nothing about the DUP.

Obviously I am beyond annoyed by this ridiculous allegation, and the fact that it was sent in this informal manner from an iPhone to [REDACTED]. If the DUP has a real complaint, let's hear it through the proper channels.

But I will stick with Bob's suggestion and express my "disappointment" in more measured terms!

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**From:** Bob Posner  
**Sent:** 23 November 2017 13:14  
**To:** [REDACTED]  
**Cc:** Craig Westwood; Claire Bassett; Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

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Bob.

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**From:** [REDACTED]  
**Sent:** 23 November 2017 12:42  
**To:** Craig Westwood; Claire Bassett; Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

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**Sent:** 22 November 2017 15:56  
**To:** Claire Bassett; [REDACTED]; Ann Watt; Executive Team; Louise Edwards; [REDACTED]

Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Agree with Claire and Bob, let's press ahead

---

**From:** Claire Bassett

**Sent:** 22 November 2017 15:53

**To:** [REDACTED] Ann Watt; Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

Hi

Interesting times- I agree with Ann. I think we are disappointed to be at point where we are publishing other info without it and that doesn't change if they lay order tomorrow, also letter likely to be out there before long and as sent that can't change it.

If want to soften it we could add something along lines that we look forward to publishing data when order is laid and hope that will be soon...but not sure will help much

thanks

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**From:** [REDACTED]

**Sent:** 22 November 2017 15:49

**To:** Ann Watt; Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson; [REDACTED]

**Subject:** RE: Transparency in Northern Ireland - update

All

[REDACTED] has just spoken to [REDACTED] at the NIO who has confirmed that internal clearance has now been given to lay the Order. It is possible that this may happen as soon as tomorrow. However I think, given our experience to date, this is far from guaranteed.

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[REDACTED]

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**From:** Ann Watt  
**Sent:** 10 November 2017 13:31  
**To:** Executive Team; Louise Edwards; [REDACTED]  
 [REDACTED] Ben Wilkinson  
**Subject:** Transparency in Northern Ireland - update

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 16:36  
**To:** Craig Westwood; Ann Watt; Bob Posner  
**Cc:** Claire Bassett; Executive Team; Louise Edwards; [REDACTED] Ben Wilkinson;  
[REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Ann has approved this so issuing to NI media now

Thanks

---

**From:** Craig Westwood  
**Sent:** 23 November 2017 15:47  
**To:** [REDACTED] Ann Watt; Bob Posner  
**Cc:** Claire Bassett; Executive Team; Louise Edwards; [REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

This makes it sound like either 1) we think the government has acted in response to our statement this morning, or 2) the govt has acted quickly in all things on this issue. Tell me if I'm wrong, but I don't think we want to imply either of those things.

Suggested version below which focuses on why this matters – have also suggested saying 'begin publishing' as it's good to emphasise that this isn't a one-off :

"We are pleased that the UK Government has acted to make this important change a reality. Transparency in how our political parties are funded is key to ensuring public trust and confidence in the democratic process. We hope to be able to begin publishing this information early in the New Year."

---

**From:** [REDACTED]  
**Sent:** 23 November 2017 15:32  
**To:** Ann Watt; Bob Posner  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Small but important change suggested by [REDACTED] – Given that announcement is now imminent from NIO I would be keen to get a quick signoff on the below if possible

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**To:** Ann Watt; Bob Posner  
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Grateful for thoughts on this approach.

[REDACTED]

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**Sent:** 23 November 2017 13:25  
**To:** Bob Posner; [REDACTED]  
**Cc:** Craig Westwood; Claire Bassett; Executive Team; Louise Edwards; [REDACTED]  
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**Sent:** 22 November 2017 15:56  
**To:** Claire Bassett; [REDACTED]; Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

Agree with Claire and Bob, let's press ahead

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**From:** Claire Bassett  
**Sent:** 22 November 2017 15:53  
**To:** [REDACTED] Ann Watt; Executive Team; Louise Edwards; [REDACTED]  
[REDACTED] Ben Wilkinson; [REDACTED]  
**Subject:** RE: Transparency in Northern Ireland - update

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**Subject:** RE: Transparency in Northern Ireland - update

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[REDACTED]

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**Sent:** 10 November 2017 13:31

**To:** Executive Team; Louise Edwards; [REDACTED]

[REDACTED] Ben Wilkinson

**Subject:** Transparency in Northern Ireland - update

We met this morning with [REDACTED] from NIO. Not good news I'm afraid. The secondary legislation to enable publication of the NI donation and loan data is ready to be laid, but has been delayed. [REDACTED] did not tell us the reason for the delay. NIO's official line is that "the legislation is still going through internal government clearances".

[REDACTED] said that this delay could last for some time. On the positive side, he also said that progress could be made quickly at any point. So we should continue to press ahead with our preparations for publication of the first set of data.

We are due to publish the GB Q3 donation and loans data on 23 November, which is when we were expecting to publish the first set of NI data. Unless others disagree, on 23 Nov I think we should put out a strongly worded statement expressing our disappointment that the necessary legislation has not be laid. Given that the NIO has had to consult the Commission on the draft legislation, we might even say that we know that the legislation has been drafted and from our perspective is ready to be laid in Parliament.

Ann

**Ann Watt**

## Head of Electoral Commission, Northern Ireland

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[REDACTED]

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**From:** Ann Watt  
**Sent:** 30 November 2017 11:41  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** [REDACTED]

Hi both – [REDACTED] from [REDACTED] was just in the office about something else, and he mentioned John's letter asking for the additional D&L information. He said it was complicated to pin down the dates, but that he would get it done by early next week. So it looks like he will miss your deadline of tomorrow, but at least we know he is dealing with it.

Ann

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 22 November 2017 10:40  
**To:** [REDACTED]  
**Subject:** RE: Wording re donations of less than £500

Thanks [REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 22 November 2017 10:36  
**To:** [REDACTED]  
**Subject:** RE: Wording re donations of less than £500

Yes, but see slight amend below

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**From:** [REDACTED]  
**Sent:** 22 November 2017 10:28  
**To:** [REDACTED]  
**Subject:** Wording re donations of less than £500

All,

I will be including the para below in some of the letters about Q3 2017 returns – Can you please confirm if you are happy with the wording or have any amendments by Friday 24 November 2017.

“The report included a series of payments for amounts of ~~less than £500~~ or less. Under PPERA anything with value of £500 or less is not a donation and does not need to be included in the aggregate of donations reported.”

Regards

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 24 November 2017 09:37  
**To:** Political Finance and Regulation; Ann Watt; Ailsa Irvine  
**Cc:** [REDACTED]  
**Subject:** The Transparency of Donations and Loans etc. (Northern Ireland Political Parties) Order 2018

All

Just to confirm that the Transparency of Donations and Loans etc Order was laid before Parliament yesterday afternoon. Under PPERA, it is currently unlawful for the Electoral Commission to disclose any information reported to us about donations and loans made to Northern Ireland parties and regulated donees. Once the new legislation is passed, details of reportable donations received and loans entered into by parties and regulated donees (members of political parties, members associations, and holders of elective office such as MPs, MEPs, MLAs and councillors) from 1 July 2017 will be published on our website.

Now the Order has been laid, guidance has:

1. Published a new [factsheet](#) explaining the changes to the rules with working examples;
2. Updated our [website](#) to reflect the changes; and
3. Issued a letter to all NI party treasurers and NI MPs/MLAs explaining the changes to the rules and where they can find more information (this is part of a series of letters sent to parties/MPs to help them understand the rules).

This work has been on-going for some months and we are pleased to have been able to publish our guidance to provide clarity on the new rules. Further guidance will be published as soon as the law come into force.

There's still internal implementation work to consider before the law come into force but this is a big step forward.

Happy to discuss if you have any questions.

[REDACTED]  
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**Electoral Administration and Guidance**  
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**From:** [REDACTED]  
**Sent:** 30 October 2017 15:21  
**To:** [REDACTED]  
**Cc:** Ann Watt  
**Subject:** Update on Processing Q3 NI Donation and loan returns

By way of an update, so far today we've received two returns and are expecting another before close of play.

As below, I've logged receipt in our postal log and folder in the safe. I've scanned today's two (along with the late Friday arrivals) and uploaded all to N drive. [REDACTED] – you'll see there is now a standalone pdf within both the donation and loan sub folders of the "NI Transparency" folder created by [REDACTED]. I haven't created additional party folders in case there's a rationale for the existing party list that I'm unaware of.)

The "Current donations and loans spreadsheet from 2008 onwards" has been updated too.

Regards

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 20 October 2017 15:19  
**To:** [REDACTED]  
**Cc:** [REDACTED] Ann Watt  
**Subject:** RE: Processing Q3 NI Donation and loan returns

Works for me.

Thanks [REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 20 October 2017 14:39  
**To:** [REDACTED]  
**Cc:** [REDACTED] Ann Watt  
**Subject:** Processing Q3 NI Donation and loan returns

Hi [REDACTED]

Following on from our conversations earlier today about recording receipt of donation and loan returns received into the NI office in order to avoid duplication/confusion I thought I would set out my understanding of what will happen. Please come back to me if this isn't correct or you think it makes more sense to do things a different way.

The NI office will:

- Log receipt of any physical /email returns submitted to the NI office in the NI post log and document record sheet in the Q3 2017 physical folder in the NI safe.
- Scan and upload the returns as soon as possible to the relevant party's sub folder in the 'NI Transparency' Folder on the N Drive.

- Complete the '**data**' sheet on the "*Current donations and loans spreadsheet 2008 onwards*" (ie date received and logged and colour coded to indicate if it reported a donation /loan or if it is a 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup> nil return.) We will leave London colleagues to complete the '**Notes**' sheet which appears to be a new addition on the spreadsheet.
- We will record the details of actual donations reported on the political party data spreadsheet, as we have previously been doing and will carry out permissibility checks on any reports received into the NI office - We can agree how you would like completion of the checks communicated to you/recorded.

We will not enter data on any of the newly formed spreadsheets in the Q3 sub-folder in the NI transparency folder. i.e. exemptions spreadsheet and a publications spreadsheet

In terms of the detail of any changes to existing loans – we can continue to log this on the existing loans sheet if you are happy with that? If there are new loans we can agree where is best to record these on the N drive – as well as PEF online if that is proposed.

As mentioned I'm happy to do things another way, but we are now receiving Q3 2017 returns and I would like to avoid any confusion about who records what and where.

Please give me a call if you would like to discuss this.

Regards

[Redacted]

[Redacted]

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**From:** [REDACTED]  
**Sent:** 23 November 2017 09:35  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Embargoed: Latest figures for GB political party donations and loans borrowing published

Hi [REDACTED]

Apologies, figure corrected below. Total accepted in quarter 3 was: £6,187,723

This will go live on our website shortly.

Thanks and best wishes,  
[REDACTED]

## Press release

23 November 2017. 9.30am

# Latest figures for GB political party donations and loans borrowing published

Seven political parties registered in Great Britain reported accepting a total of more than £6 million in donations between 1 July and 30 September 2017 – the first quarterly reporting period after the UK Parliamentary general election - according to new figures published today.

This quarter saw around the same amount in reported donations when compared to the same quarter in 2016 (£6.5million). There was a steep decline compared to the previous quarter of 2017, which covered the UK Parliamentary general election and saw more than £40 million in donations reported.

The seven political parties to report donations accepted were:

Party	Total accepted in quarter 3 2017
Conservative and Unionist Party	£3,701,470
Co-operative Party	£30,000
Green Party	£26,550
Labour Party	£1,739,580
Liberal Democrats	£610,444
Scottish National Party (SNP)	£44,039

Party	Total accepted in quarter 3 2017
UK Independence Party (UKIP)	£35,640
<b>Total</b>	<b>£6,187,723</b>

In addition to these donations, during the third quarter of 2017 five parties accepted a total of more than £3.3 million from public funds – money and assistance allocated to parliamentary opposition parties to assist with costs.

The value of outstanding loans to political parties as of 30 September 2017 stood at £4,151,868, which is a decrease of £59,240 compared to the end of the second quarter of 2017.

Ten parties failed to meet the deadline for reporting for this quarter. The Commission will consider each of these matters in line with its enforcement policy, which is available to view [here](#).

## Northern Ireland

In July this year the Secretary of State for Northern Ireland announced legislation would be brought forward to enable the publication of donations and loans received by political parties in Northern Ireland from 1 July 2017.

The Electoral Commission had expected to publish the first set of this data as part of today's publication; however, the legislation has not been made and the Commission continues to be prohibited from publishing this information.

**Bob Posner, Director of Political Finance and Regulation & Legal Counsel at the Electoral Commission said:**

“This data is hugely important in ensuring that our political finance system is as transparent as possible across the whole of the UK. We are extremely disappointed that we are unable to provide the public with the information they expected on how political parties in Northern Ireland are funded. The continuing secrecy only serves to undermine trust and confidence amongst the public in the democratic process.

“The Commission urges the UK Government without delay to bring forward the legislation that it has already announced, for parliament to approve. This would allow us to publish donations and loans to Northern Ireland parties as soon as possible.”

## Further information

A summary of donations reported in the third quarter of 2017, including the highest donors, is available [here](#).

Full details of donations and loans are available on our registers [here](#).

Full analysis and breakdown of the figures for quarter three 2017 is available on our website [here](#).

Full statement on transparency in Northern Ireland can be found [here](#).

## Ends:

For further information please the Electoral Commission press office on 020 7271 0704 or email [press@electoralcommission.org.uk](mailto:press@electoralcommission.org.uk).

For further information on transparency in Northern Ireland please contact Cahir Hughes on 028 9089 4023.

For out of hours queries, please call 07789 920 414.

## Notes to editors

1. 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 by:

- enabling the delivery of free and fair elections and referendums, focussing on the needs of electors and addressing the changing environment to ensure every vote remains secure and accessible
- regulating political finance – taking proactive steps to increase transparency, ensure compliance and pursue breaches
- using our expertise to make and advocate for changes to our democracy, aiming to improve fairness, transparency and efficiency

The Commission was set up in 2000 and reports to the UK and Scottish Parliaments.


2. The Political Parties, Elections and Referendums Act 2000 (PPERA) requires registered parties to report cash and non-cash donations and borrowing to the Electoral Commission on a quarterly basis. Political parties must report all donations and borrowing over £7,500 relating to the central party, or over £1,500 relating to an accounting unit. This includes aggregates of donations and loans from the same source during the calendar year.

3. As the parties only report donations and loans over these thresholds, the figures do not include all donations and loans to political parties. Donations and loans under these thresholds are recorded in political parties' annual Statements of Accounts. To view these accounts, visit our register [here](#).

4. Public funds are donations from the House of Commons, the House of Lords, the Scottish Parliament and the Electoral Commission. 'Short' and 'Cranborne' grants are available to parties in opposition in the House of Commons or House of Lords respectively.

5. Some donations appear on the register as being from the Electoral Commission. These are Policy Development Grants, which were established by the Political Parties, Elections and Referendums Act 2000 for parties represented in the Commons by two or more sitting members. The grants are intended to assist parties in developing the policies that they will present in an election manifesto. The legislation provides the total sum of £2 million annually for this purpose. Policy Development Grants became reportable as donations for the first time in quarter three of 2006 as a result of the Electoral Administration Act 2006.

6. There were 364 registered political parties in Great Britain during this quarter, 59 of which were required to submit their quarterly donation returns and 52 to submit borrowing information within the deadline. The remaining political parties were exempt (unless they received donations) because they have previously submitted four consecutive nil returns.

  
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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 17 October 2017 15:32  
**To:** [REDACTED]  
**Subject:** Permissibility in Northern Ireland (for info)

Hi

Just to follow up from the session on Friday, the link below will take you to an unpublished guidance document, This will give you a better idea of the differences between GB and NI.

Please do not share this document externally. It will be update shortly to cover the changes that are taking place with transparency etc. I'll let you know when the Guidance Team issue new documents on NI, which could be as early as this week.

<http://skynet/dm/Functions/PEFpol/Election%20Events%202016/Permissibility%20for%20Northern%20Ireland%20Political%20Parties%202016.docx>

Thanks

[REDACTED]

# The Electoral Commission

The Rt Hon James Brokenshire MP  
Secretary of State for Northern Ireland  
Northern Ireland Office  
1 Horse Guards Road  
LONDON  
SW1A 2HQ

21 November 2017

Dear Secretary of State

On Thursday 23 November the Electoral Commission will be publishing information on donations and loans received between July and September 2017 by political parties in Great Britain. We were also expecting, for the first time, to publish this information for political parties in Northern Ireland, following your announcement in early July that you would be bringing forward legislation to enable such publication.

Over the last few months Commission staff have been working closely with NIO officials on the necessary legislation that would allow the Commission to publish details of donations and loans reported by political parties in Northern Ireland. We have provided feedback on the drafting of this legislation and were satisfied that it was ready to be laid before Parliament. We were previously advised that this would happen by the middle of October. However this did not happen and no progress seems to have been made since then.

Without the necessary legislation being brought into force by the UK Parliament, the Commission continues to be prohibited from publishing any information relating to donations and loans received by political parties in Northern Ireland. Following your announcement in July there was a public expectation that information on how political parties in Northern Ireland are funded would be available by the end of the year. It is now unclear as to when this will actually happen. We are of the view that this further undermines trust and confidence amongst the public in the democratic process.

We will be issuing a media statement on 23 November to explain why we are unable to publish information on donations and loans in Northern Ireland, to express publicly our disappointment, and to make clear that we are in touch with you about this.

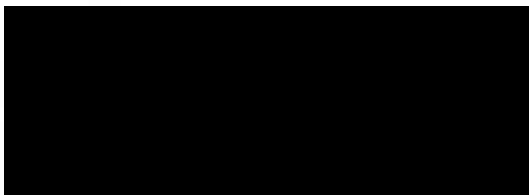
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London EC1Y 8YZ

Tel: 020 7271 [REDACTED]  
[REDACTED]

# The Electoral Commission

I would urge you to do all you can to ensure that any difficulties preventing the necessary Order being laid in Parliament are now resolved. The Commission stands ready to publish information on donations and loans in Northern Ireland as soon as legislation is brought into force.

Yours sincerely



**Sir John Holmes**  
Chair