

[REDACTED]

From: FOI
Sent: 22 December 2020 17:40
To: [REDACTED]
Subject: FOI 149-20 - Response
Attachments: 149-20_Attachment_Redacted.pdf

Dear [REDACTED]

Our Ref: FOI-149-20

Thank you for your email to the Electoral Commission dated 24/11/2020.

The Commission aims to respond to requests for information promptly and has done so within the statutory timeframe of twenty working days. Your request is in bold below followed by our response.

Can you please send me a link to the comments from the public in relation to this application [Action for Independence Party] and to our original application?

Our response is as follows:

We hold the information you have requested. Please find attached copies of comments received on the applications to register Action for Independence and Alliance for Independence.

You will notice that some information has been redacted. This is because this information is exempt under section 40(2) of the Freedom of Information Act 2000. Section 40(2) provides for an exemption where the information requested constitutes personal data and releasing the information would breach one of the data protection principles under the GDPR. The information that has been redacted includes names and email addresses of individuals that provided comments. We have also redacted the names of junior members of Commission staff who have a reasonable expectation for their names not to be released. As this is personal information, releasing it would be a breach of the GDPR principles, and so we will not do so.

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

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

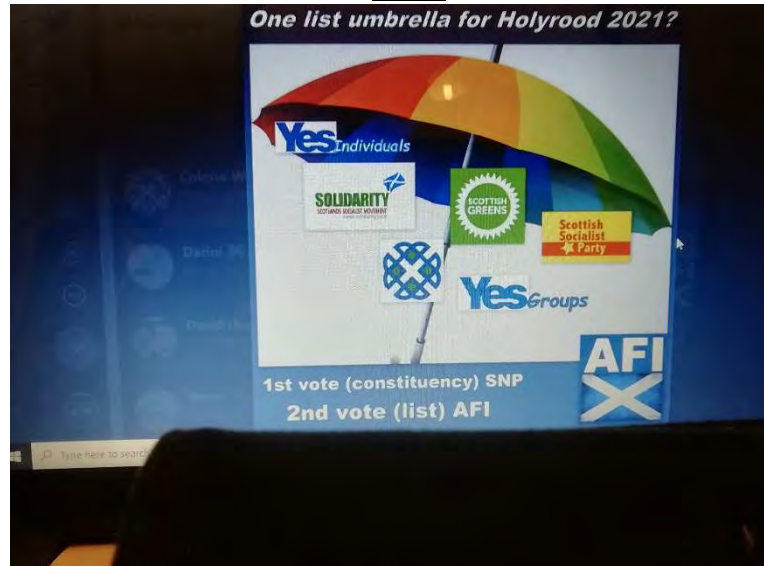
Yours sincerely,

Information Team
The Electoral Commission
electoralcommission.org.uk

Commenter	Comment
<div data-bbox="97 190 582 280" style="background-color: black; width: 294px; height: 40px;"></div>	<p data-bbox="624 197 767 230">2 August:</p> <p data-bbox="624 237 1481 421">I wish to make a complaint about a new political Alliance/Party who are in the process of applying to the Electoral Commission for permission to stand in the Holyrood Election next May 2021. Please advise me how to proceed. Thank you.</p> <p data-bbox="624 470 767 504">4 August:</p> <p data-bbox="624 510 1485 1500">After studying your guidelines for a new political party applying for registration with the Electoral Commission I feel I have good grounds to complain about the application submitted by Alliance for Independence. There are two appropriate headings applicable in my estimation. Mislead Voters and Confuse Voters. They appear to be applying for two registrations at the same time. I contend that they are either a party or an Alliance of parties. If they're a party they can only vet their own candidates but can't have other parties under their name. If they're an Alliance of parties they can't vet their own candidates. From press releases they are proposing that they should be in control of all the money given to them from other parties & groups under their name. This suggests they don't actually see themselves as a party after all. It remains to be seen if the members of these parties & groups would be happy about their membership fees being used in that way. The A.F.I. also propose that they should be in charge of who stands where on lists & regions. This would result in the probability that members of a particular party would not have one of their own candidates to vote for. More confusion comes from their proposal that their own candidates will have the first choice. If they're not a party what candidates are they referring to ? Overall this isn't at all democratic. The ballot paper will state A.F.I. & voters will be voting blind, not knowing who they're really voting for or what policies they're voting for.</p> <p data-bbox="624 1507 1458 1612">I realise that you must be extremely busy so I apologise for the length of these comments. If you could manage a quick acknowledgement, I'd be most grateful. Best regards,</p> <div data-bbox="624 1612 927 1653" style="background-color: black; width: 190px; height: 18px;"></div> <p data-bbox="624 1659 767 1693">9 August:</p> <p data-bbox="624 1700 1485 1953">Hello again [REDACTED] the above named applicant, who is re-applying to the EC as I type this is putting the advert attached below, about on Social Media. They have changed their name to Action For Independence. I have been informed that permission from all parties except one has not been granted. I thought you should know what you are dealing with. Best regards, [REDACTED]</p> <p data-bbox="624 1960 799 1993">16 October:</p> <p data-bbox="624 2000 1481 2105">Dear [REDACTED], many thanks for your email. I have 4 links that should help. @action4indy, their timeline has my earlier photo as part of a tweet by them on October 9th and further</p>

down their timeline also. @PoliticsScot ,an account by a member of ISP, tweets about the parties that rejected AFI's requests. @IndyScotParty tweeted on Oct 12th & 13th about their rejection. www.thenational.scot covered the story around about the 9th also. There are two bodies of people included under that umbrella who are not political parties, so it's impossible to say if the AFI's claim about them qualifying to be under it is valid. AFI have still not taken down their offending tweet to date.

If you require any more information, please don't hesitate to contact me, Best regards [REDACTED]



28 October:

Good morning [REDACTED], further to my most recent email, I've been studying the AFI re-submission and I have to say there appears to be as many unanswered questions as there were before.

- 1) Who chooses the candidates and in which order, if from Independent candidates and other parties ?
- 2) It will be impossible for the electorate to be sure of who or what they are voting for apart from one issue only.
- 3) Who is their Leader, who is their Treasurer and who is their Nominating Officer ?
- 4) Who is in charge of the Candidates campaign funds as other parties would have to share their financial scheme and Constitution ?
- 5) Who is going to vet Candidates who'll be standing under their name ?

With my Regards, [REDACTED]

31 October:

Good Morning [REDACTED] I thought you better be aware of this and are they taking money for membership ? Regards, [REDACTED]



10 November:

Good Morning [REDACTED], I thought you better be aware of this and are they taking money for membership ? Regards,

[REDACTED]



[REDACTED]

Is it possible to comment on this site about the proposed registration of the AFI (Action for independence) in Scotland?

If not, please tell me how to do this. If it is possible, broadly speaking my objections to their registration are as follows:

They say they are an umbrella organisation - in today's edition of the National, their communications officer states (parag 3) - 'AFI has repeatedly said it is not a party but an 'umbrella' group or alliance of parties, Yes groups and individuals. I understood that their initial registration was rejected on the grounds that they mislead the public by saying they are an alliance. If this is so, how have they changed? They talk about other parties aligning with them, but this is then an alliance, isn't it?

I also object to the fact that they are calling themselves 'Action', now, in fact anything beginning with 'A' to try and get to the top of the list of parties, thus getting people's attention first.

How does their alliance with Solidarity play into the idea that they are a party in their own right? and how do they square their aim for others allying with them standing their own candidates?

They have one policy only, independence, which does not sound like a party either.

For all these reasons I object to their registration for the Holyrood elections or anything else.

[REDACTED]

10 November:

I previously contacted you via your online feedback form lodging an objection to the registration of Action for Independence on a variety of grounds including AFI's failure to exhibit a fit for purpose Constitution and the confusion caused to voters because they have no knowledge of which Party the affiliated members will be standing for, under their umbrella, and therefore could be voting for Parties whose

	<p>policies they disapprove of. They also fail to demonstrate a robust vetting process.</p> <p>I now have a specific example of the problem about the vetting process. Martin Keatings, an independent candidate for Mid Scotland and Fife for the Scottish Parliamentary Elections 2021, advertises himself on Twitter as Convener of AFI and also Head of ForwardASOneYes. There has been no evidence of a vetting process to ensure that Mr Keatings is an appropriate individual for public office.</p> <p>10 November:</p> <p>I am contacting you about my concerns regarding the application for registration by Action for Independence. I contacted you recently expressing, among other issues, concerns about AFI's ability/ intention to vet candidates that are not of their own Party but whom they are endorsing and including under their 'umbrella'. I now have a specific example of this problem. Martin Keatings, an independent candidate for Mid Scotland and Fife for the Scottish Parliamentary Elections 2021, advertises himself on Twitter as Convener of AFI and Head of ForwardASOneYes. There has been no evidence of a fit for purpose vetting process, however.</p> <p>2 November:</p> <p>I am commenting about the Action for Independence Political Party registration.</p> <p>I object to this registration because:</p> <ol style="list-style-type: none">1. AFI would confuse voters. As AFI is mixtures of candidates from Parties that wont actually be listed, many voters wont realise that they could be voting for Parties that have policies or principles to which they are opposed.2. They also wont know the integrity of those whom they are voting for. They wont know if the candidates have been vetted, who is responsible for the campaign money, who decides the order of Parties on the list and in what order the candidates are placed.3. Currently AFI have not said who their leader, treasurer or nominating officer is. They are not listed in their Constitution which says that other Parties would have to share their Constitution and financial scheme.4. AFI does not appear to have the probity or due diligence that a voter would expect of a political party.
<div data-bbox="108 1794 472 1868" data-label="Text"><p>[REDACTED]</p></div>	<p>I see you have yet another application from AFI, now action for independence</p> <p>Firstly AFI is used by Airdrie For independence Their constitution gives no named leader , treasurer , nominating officer , I was of understanding this was required on your online application form ?</p> <p>There is no official address</p>

	<p>They are asking ‘ other parties’ to abide byTHEIR. constitution, can you explain how does/can work, approved parties have their own constitution’s and financial schemes which , you , the EC have approved them to use Who then deals with campaign money ? AFI treasurer , or the other parties ?</p> <p>Who is vetting their candidates ?</p> <p>Who decides who stands in which region and in which order ?</p> <p>Party members will not be happy if they can’t campaign for a candidate from their party /branch Voters will not know who they are voting for ,yes they may say they support Scottish independence, but Parliament is a 5 year term , voters should know they are voting someone who they feel represents them , they political values, principles and vote for or against issues that are important to them , it cannot be a one policy vote and with just saying AFI on ballot you won’t really know who is in what order</p> <p>I hope these issues will be considered against approval as really does seem a very confusing strategy, if I can call it a strategy</p>
<div data-bbox="108 1025 502 1102" style="background-color: black; width: 247px; height: 34px; margin-bottom: 2px;"></div> <div data-bbox="108 1064 502 1102" style="background-color: black; width: 247px; height: 17px;"></div>	<p>I wish to make objection to Action for Independence’s party application on the following points.</p> <ol style="list-style-type: none">1. AFI is blurring the lines between being a) a political party in its own right and b) being an umbrella group that is bringing together existing organisations in an electoral pact2. AFI will lead to voter confusion and also misrepresentation.3. AFI’s financial scheme is confused and unclear. <p>1. AFI is blurring the lines between being a political party in its own right and being an umbrella group bringing together existing organisations in an electoral pact.</p> <p>Electoral pacts commonly take a number of forms. They can consist entirely of registered political parties that have decided to work together, or a mixture of parties and trade unions or maybe trade unions and interest groups. Sometimes the pact is an informal one, where they agree not to run candidates against each other; but other times the pact is more formal where they adopt a common name to run under and pool resources. Whatever form it takes, all those who participate in such a pact belong to one of the groups in the pact. For example, those who are in the Labour and Cooperative parties have membership of Labour or of the Cooperative party, or both. You don’t get members who belong to neither.</p> <p>Yet that is what AFI are doing. In section 4 of their constitution it says this;</p>

a) Individual Membership: Individual membership is open to all, who agree to adhere to this constitution and all rules and protocols of AFI.

b) Affiliate Membership: Affiliate membership is available to any Yes or other Independence supporting group which agrees to adhere to this constitution and all rules and protocols of AFI.

c) Umbrella Party Membership: Umbrella Party membership is open to any Registered Scottish Political Party which agrees to adhere to this constitution and all rules and protocols of AFI.

d) Membership Fees: All membership fees will be ratified by Conference each year.

This raises a number of questions. If someone can be an individual member of AFI, does that mean that AFI are a separate political party as well as the 'umbrella' under which the others stand?

If AFI are a separate political party within this arrangement, then that is how they should behave. The other parties/groups shouldn't be paying subscriptions to them. If the other parties have to do this, then essentially it is misrepresentation. The parties concerned are running under their own banner, but also funding another political party. Under this arrangement they should either be instructed to merge with AFI, or not pay them subscriptions. Again, this has implications for what symbol these parties should be running under. If AFI are a separate political party then the other parties should not be running under the AFI symbol; it is misrepresentation.

2. AFI will lead to voter confusion and also misrepresentation.

if AFI wish to be considered a separate political party, do they pass the purpose test for this? They have no policies apart from independence. They have instructed their members to support a pro independence Government and keep it in power in section 2 of their constitution.

2.d)For the sake of clarity, anyone selected as an AFI candidate or elected as an AFI MSP will be bound to support any pro-independence Scottish Government proposal to secure the objectives in 2(b). In addition, all AFI candidates and MSPs will be bound to keep a pro-independence Scottish Government in power to enable it to deliver these objectives. In all other matters an AFI candidate or MSP may promote, support, argue for and vote for their own party programme or individual conscience

In practical political terms this means that AFI members would have to vote for the Scottish Government budget every year; they would also have to vote for the ruling party on any vote of confidence on any matter to stop the government falling. They may say that they are simply supporting independence but in actual fact they are committing themselves to keeping that party in power. Again this is blurring political lines. Who and what would a

voter be voting for under these stipulations? How would they know what they were voting for?

3. AFI's financial scheme is confused and unclear.

AFI's financial scheme is also confused. AFI requires the affiliates to sign up to a constitution and a financial scheme under part 9 of their constitution:

9. Financial Management

The Vice-Convenor (Finance), acting as Treasurer for Electoral Commission purposes, will, on behalf of the National Executive, enter arrangements with a registered clearing house bank to open such accounts as may be considered necessary and prudent to advance the aims and objectives of AFI on behalf of the membership. All accounts will be held in the name of the 'Action for Independence' and will be operated in accordance with the Standing Orders in Appendix 1

Regional Groups and Umbrella Parties

a) Regional Groups shall adopt a constitution based on this AFI National Constitution and shall agree to, and abide by, this AFI National Constitution in all of their dealings as member Groups of AFI.

b) Yes or other independence supporting Groups (Affiliate members) shall be accepted as members of their Regional Group of AFI on agreement to abide by the constitution of the group.

c) Umbrella Parties shall be accepted as members of AFI on agreement to abide by this AFI National Constitution
Financial Management

3. The AFI constitution provides for the membership of Affiliated Organisations (Yes or other independence supporting groups) and Umbrella Parties. For the avoidance of doubt, these organisations are not accounting units of the AFI.

But it also states that those parties/groups retain their own autonomy and constitution (and presumably financial scheme, if they are a registered party). How then is financial reporting done? Will it be done through the auspices of the individual party, or through AFI? Under joint campaigning rules each party would normally look after reporting for its own candidates under a pact arrangement. But if these parties sign up to AFI's constitution and financial scheme, will they not have to adopt this as their own, especially as they are also required to pay subscriptions? And would they not then be accounting units of AFI?

Conclusion

AFI's application is confused and non transparent. It is oscillating between being a political party, an umbrella for a political pact and being a non party campaigner. It has to decide what it wants to be and stick to one model. It should not be allowed to 'pick and mix' between all three. The application as it stands, should be rejected.

Good morning,

I am writing to register my bemusement and anger that anyone is promoting themselves as a candidate in the forthcoming Scottish elections for a political party that has not been registered as such.

Please find attached a screenshot of the matter in question.

Regards

[Redacted]

[Redacted]



The screenshot shows a Twitter profile for Martin J Keatings. At the top, a blue notification banner reads: "New Tweet from Mrsali Nicaghobhainn @StrongerStabler: Home Secretary Priti Patel was p...". Below this, the profile header shows the name "Martin J Keatings" in bold, followed by the hashtags "#Martin4MidScotlandAnd Fife #AFI2" and the handle "@MartinJKeatings". The bio states: "Martin J Keatings - Independent Candidate for Mid-Scotland and Fife alongside Action for Independence @action4indy Convener @ForwardAsOneYes - Head @PeoplesAS30". The location is "Fife | Scotland" and it says "Joined December 2019". Below this, it shows "123 Following" and "5,118 Followers". A section titled "Followed by" shows a small circular profile picture of a woman and the text "@Wilma МакЭван #LOUDa...". At the bottom, there are four tabs: "Tweets", "Tweets & replies", "Media", and "L". The bottom navigation bar of the app is visible with icons for home, search, notifications (with a '2' badge), and messages.

New Tweet from Mrsali Nicaghobhainn
@StrongerStabler:
Home Secretary Priti Patel was p...

Martin J Keatings
#Martin4MidScotlandAnd Fife #AFI2
@MartinJKeatings




Martin J Keatings - Independent
Candidate for Mid-Scotland and Fife
alongside Action for Independence
[@action4indy](#) Convener
[@ForwardAsOneYes](#) - Head
[@PeoplesAS30](#)
Fife | Scotland
Joined December 2019

123 Following **5,118** Followers

Followed by @Wilma МакЭван #LOUDa...

Tweets Tweets & replies Media L

Commenter	Comment
<div data-bbox="97 185 655 230" style="background-color: black; height: 20px; width: 100%;"></div>	<p data-bbox="746 197 1444 264">I am writing to complain about an application you have published on your website on 30 July</p> <p data-bbox="746 315 1460 499">Alliance for Independence AFI as they wish to be known , as a member of Airdrie for independence AFI which we have been using for years , I do not think this should be allowed</p> <p data-bbox="746 551 1476 987">I understand that they wish to be an ' alliance ' brining other independent voting political parties together but then state they will field /vet their own candidates ? Can I ask how can this happen ? You need to be a registered political party to stand candidates in any election , if they are registering as a party, then they can't campaign for members to vote for another parties candidate They also say that on ballot paper it will only state AFI, so voters will not know who they are voting for , what the candidates policies are , this is very in democratic indeed .</p> <p data-bbox="746 999 1342 1066">There are so many issues I have with this application .</p> <p data-bbox="746 1122 1469 1256">If voters want to vote for a particular party /policies then they should have them on ballot sheet not voting blind Who pays for all these candidates ? The party ? AFI?</p> <p data-bbox="746 1267 1469 1335">Who decides who stand where and in what order ? AFI?</p> <p data-bbox="746 1346 1460 1491">How does this then work with political parties financial schemes ? Election returns ? Campaign budgets etc , who governs all the candidates from different parties if standing under AFI?</p> <p data-bbox="746 1547 1453 1648">I think this is very confusing , very easy to be tampered with financials, very in democratic , and confusing process for voters</p>
<div data-bbox="97 1653 568 1742" style="background-color: black; height: 40px; width: 100%;"></div>	<p data-bbox="746 1664 1481 1776">The Alliance for Independence has sought electoral registration. It calls itself AFI. There is already a Party called AFI. (Airdrie for Independence)</p> <p data-bbox="746 1816 1481 2029">Is Alliance for Independence actually a political Party or not? If it's only an Alliance, it can't field its own candidates but its leader David Thompson has stated during an interview podcast 'The Scottish prism' that it will field its own candidates AS WELL AS being an umbrella alliance group.</p> <p data-bbox="746 2074 1445 2141">Importantly, Parties have to vet candidates presented in their name but the Alliance can't vet</p>

	<p>other Parties' candidates yet they will be putting forward candidates from other Parties (as well as their own) and will have no say on whether these candidates are appropriate, and cant take responsibility for them.</p> <p>The financial scenario that the Alliance for Independence is proposing, isn't fair. They state that other Parties will give them money however the Party members who have provided this money did not do so with the expectation that the funds would be given to another Party. Or they would have joined the Alliance - if it is a Party.</p> <p>It is important that members of Parties and other voters understand who they are voting for. The system proposed by the Alliance undermines this. According to its proposals, it chooses which Party or group or individual candidate associated with the Alliance itself, stands or does not stand in a particular region - so members of other Parties might not be able to vote for their own Party. They will not even know who they are voting for, if the ballot paper simply states AFI. The scenario is confusing and obfuscating.</p> <p>All in all, the Electoral Commission should not accept the Alliance's application as it stands.</p>
	<p>I believe that the Alliance for Independence misleads voters as it is not actually a political party. It is an umbrella organisation without distinct policies. In particular it does not have policies that are distinct from other parties. However, voters will think that this is a party that has its own candidates and has policies. In fact the most likely situation here - as only SNP members comprise this party - is that it is a fraudulent SNP clone intended to defraud the system.</p>
	<p>I wish to make a complaint about a new political Alliance/Party who are in the process of applying to the Electoral Commission for permission to stand in the Holyrood Election next May 2021. Please advise me how to proceed. Thank you.</p>
	<p>I wish to make a complaint about a new political Alliance/Party who are in the process of applying to the Electoral Commission for permission to stand in the Holyrood Election next May 2021. Please advise me how to proceed. Thank you.</p> <p>After studying your guidelines for a new political party applying for registration with the Electoral Commission I feel I have good grounds to complain about the application submitted by Alliance for Independence. There are two appropriate headings</p>

applicable in my estimation. Mislead Voters and Confuse Voters. They appear to be applying for two registrations at the same time. I contend that they are either a party or an Alliance of parties. If they're a party they can only vet their own candidates but can't have other parties under their name. If they're an Alliance of parties they can't vet their own candidates. From press releases they are proposing that they should be in control of all the money given to them from other parties & groups under their name. This suggests they don't actually see themselves as a party after all. It remains to be seen if the members of these parties & groups would be happy about their membership fees being used in that way. The A.F.I. also propose that they should be in charge of who stands where on lists & regions. This would result in the probability that members of a particular party would not have one of their own candidates to vote for. More confusion comes from their proposal that their own candidates will have the first choice. If they're not a party what candidates are they referring to ? Overall this isn't at all democratic. The ballot paper will state A.F.I. & voters will be voting blind, not knowing who they're really voting for or what policies they're voting for.

I realise that you must be extremely busy so I apologise for the length of these comments. If you could manage a quick acknowledgement, I'd be most grateful. Best regards, [REDACTED]


[REDACTED]

I am writing to submit a comment on the Alliance for Independence party application. I don't think this name should be accepted as it is a bit misleading since there is no actual Alliance. It gives the impression it is an umbrella party for a number of groups but it is not.

It is also possible it will confuse voters since there is a proposed Alliance for Unity party and there are also numerous groups using the AFI acronym eg. Airdrie for Independence, Aberdeen Fans for Independence and even Alba Scotland for Independence.

I'm particularly concerned voters may select Alliance for Independence when they actually want Alliance for Unity and vice versa as they are confused

Regards



Good evening, I wish to make a challenge on the Description of this application for Alliance for Independence.

They are describing themselves as a Party to obtain clearance from the Electoral Commission but by the interim leaders own verbal admission they are simply going through this process and are not in fact a political Party nor will they campaign on that basis. I have included a link to a podcast that the interim leader of this group held a couple of weeks ago where he clearly states they are just going through the process because they have to.

<https://www.barrheadboy.com/scottish-prism-31st-july-2020-david-thompson-afi/>

As a Scottish voter I take a dim view of this and hope that this will lead to their application being denied.