From:	FOI
To:	[redacted]
Subject:	FOI 066/18 Bruges Group Response
Date:	21 May 2018 15:41:48
Attachments:	REDACTED - RE EU referendum spending.pdf REDACTED - CCM correspondence.pdf REDACTED - Emails.pdf

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Dear [redacted]

Our Ref: FOI 066/18

Thank you for your email to the Electoral Commission dated **18 April 2018.**
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.

This is a request for information under the Freedom of Information Act. My request relates to the Bruges Group. I would like to request the following information:

1) All internal correspondence and communications held by the Electoral Commission that mentions, or refers to, the Bruges Group.

2) All external correspondence and communications between the Electoral Commission and the Bruges Group.

I define correspondence and communications as including (but not limited to) the following:
- Emails
- Letters
- Memos
- Briefings
- Research documents
- Press clippings
- Invitations
- Presentation slides
- Notes taken during telephone conversations

Our response is as follows:

We hold the information that you have requested. Please find attached a number of documents. Information which does not fall within the scope of one of the exemptions listed below is attached to this response. The Commission has released that which it is required to do by law.

Exemptions under sections 30(1)(a)(i), 31(1)(g), 31(1)(a) and 31(1)(b) of the Freedom of Information Act 2000 (FOI)

Some of the information we hold relates to an investigation concerning the non-delivery of a campaign expenditure return by the Bruges Group following the 2016 EU referendum.

The Commission has a statutory function to conduct investigations into potential breaches of the reporting requirements in the Political Parties, Elections and Referendums Act 2000 ("PPERA"). The information you have requested concerns an investigation into The Bruges Group, and potential offences pursuant to section 122(1) or (2) and section 122(4)(a) of PPERA.

The outcome of this investigation was published on our website on the 16 May 2017 as part of the information we publish each month about recently closed cases. This includes the potential breach we considered, our finding, and any action taken.

The Commission was satisfied that in this case there was a reasonable excuse and therefore found no offences committed.

Section 30(1) (a) (i) provides for exemption from disclosure of information which has been held by a public authority for the purpose of any investigatory process. The section 30 exemption applies to information that is held at any time, whether or not the investigation is on-going.

Where there is no evidence of criminal activity, or in any event, the Commission may consider civil breaches of PPERA. In so far as the assessment related to other potential breaches of PPERA, section 31(1)(g) of the FOI Act exempts from disclosure information that would or would be likely to prejudice the exercise of the Commission's functions under PPERA for the purposes of ascertaining whether any person has failed to comply with the law (as provided by section 31(2)(a) of the FOI Act). Section 31 of the FOI Act applies only to the extent that the information is not exempt under section 30.

The Commission considers that disclosure of the information you have requested would prejudice the exercise of the Commission's statutory functions and its ability to conduct assessment such as in this matter.

The Commission also considers that the information you have requested is exempt under section 31(1)(a) of the FOI Act, prejudice to the prevention or detection or crime, and section 31(1)(b), prejudice to the apprehension or prosecution of offenders.

Applications of the section 30 and 31 exemptions are both subject to the public interest test. There are a number of factors that must be considered and weighed in the balance. The factors we have considered are set out below.

The public interest lies in enabling the Commission to undertake inquiries as part of its investigation powers so that it can make regulatory decisions based on a firm factual basis and to gather such evidence and facts on a confidential basis. It is in the public interest to maintain this confidentiality, as it encourages the free and frank exchange of information from third parties to the Commission without which the Commission could not perform its statutory functions.

The Commission aims to be robust and fair in its regulatory decisions. We acknowledge that there is a legitimate public interest in carrying out investigations

in an open and transparent way, and in promoting public understanding of the decisions we make as a regulator. These are matters we acknowledge and take into account, including when deciding whether to disclose information, whilst ensuring proper regulation of party political funding.

In carrying out effective inquiries the Commission depends on being able to secure the cooperation of those individuals and entities from whom we seek information. Whilst the Commission has powers to require information, the co-operation of the regulated community and other enforcement agencies remains essential to our ability to conduct our statutory functions. As our investigations rely on gathering evidence from these organisations it is clearly in the public interest that we maintain their co-operation and avoid releasing information that could prevent exchange of relevant information in the future and have the effect of hindering our ability to conduct our statutory functions.

Those individuals and entities had, and continue to have, a reasonable expectation that information provided in the course of the assessment would not be made available to the public at large. If information provided in the course of our assessment was made public under the FOI Act, it would make individuals and entities reluctant to co-operate and may prejudice interactions with them as well as others in the future. This would in turn impact on the type, timeliness, and quality of information provided to the Commission during its assessments which would prejudice the Commission's ability to conduct its statutory functions. The fact that the assessment has been closed does not affect the relevance of this.

Having carefully weighed the public interest relating to possible disclosure of the information requested under Sections 30(1)(a)(i), 31(1)(g), 31(1)(a) and 31(1)(b) of the FOI Act we are satisfied that it is not appropriate at this time to disclose the information which the Commission holds. The Commission is satisfied that maintaining the exemption outweighs the public interest in disclosure.

Exemption under section 42(1) FOI

In addition, the Commission considers some of the information regarding this request exempt from disclosure under section 42 of the FOI Act, and we are withholding this information from release. Some of the information we hold in relation to this matter contains internal legal advice.

For the reasons set out below, the Commission considers that legal advice is exempt from disclosure under section 42 of the Freedom of Information Act 2000 (FOI Act), and we are withholding this information from release. Section 42(1) provides for exemption from disclosure information that is privileged under legal professional privilege. The requested information being withheld from disclosure under section 42 constitutes legal advice which informed the decision of the Commission on this matter; it is legally privileged communications and advice provided by legal advisors.

Application of this exemption is subject to the public interest test. There is a public interest in transparency and accountability. However, it is also in the public interest to safeguard the confidential nature of legally privileged communications and advice so as to allow openness in all communications between client and lawyer

to ensure access to full and frank legal advice which in turn is fundamental to the administration of justice. There is an inherent and strong public interest in maintaining this privilege given it is in the public's interest to ensure openness in order to safeguard access to fully informed, realistic and frank legal advice. The maintenance of this privilege, as the Information Commissioner's Office and the courts have stated, helps ensure the administration of justice and the effective undertaking of public policy. Having carefully weighed the public interest relating to possible disclosure of the information requested under s 42(1), we are satisfied that it is not appropriate at this time to disclose the information which the Commission holds. The Commission is satisfied that maintaining the exemption outweighs the public interest in disclosure.

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]

Access to Information Officer (FOI & DPA)
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
FOI@electoralcommission.org.uk
electoralcommission.org.uk
yourvotematters.co.uk

Twitter | **Facebook** | **Blog**

[redacted]

From: [redacted]
Sent: 15 March 2017 15:13
To: [redacted]
Subject: RE: EU Referendum Spending

[redacted]

From: [redacted]
Sent: 15 March 2017 15:10
To: [redacted]
Subject: FW: EU Referendum Spending

Right – I'm not going mad!
I *think* the 3 cases which remain unallocated on the spreadsheet *may* have been allocated to the lovely [redacted]…but due to a small matter called [redacted] required them to be reallocated.
So…can someone please pick up
[redacted]
Thanks!

From: [redacted]
Sent: 23 February 2017 17:10
To: [redacted]
Subject: FW: EU Referendum Spending

Hi all,
I have an update from [redacted] regarding the cases which were original[redacted]
There were 3 cases which had not been reallocated – I have now reallocated these on the casework spreadsheet (see the notes column). One of them was [redacted] and as you can see, that investigation can be discontinued as there was no breach because they were subject to the December deadline. Again, the KPIs aren't helpful and we are doing the best we can – I appreciate everyone's best efforts at a busy time! If work has to be reallocated until we get totally on top of it, then so be it.
I know you are all working flat out – and it is appreciated ☺
Thanks
[redacted]

From: [redacted]
Sent: 20 February 2017 15:46
To: [redacted]
Cc: [redacted] Louise Edwards
Subject: RE: EU Referendum Spending

Hi [redacted]
See details below.
[redacted] submitted late by just under 4 months. 5 campaigners (see below) have failed to submit reports at all.
[redacted]

From: [redacted]
Sent: 17 February 2017 16:21
To: [redacted]
Cc: [redacted]
Subject: EU Referendum Spending

Hi [redacted]

The following were referred across to us late last year as they had not submitted a return ahead of the September deadline and we suspected that on the basis of the pre-polls that they were likely to be low spenders (ie below £250k).
Could you check the list please and advise whether any of these have submitted for the above £250k deadline? Also, if they have, can you advise whether there are any problems with their returns? Thanks!

[redacted] Post Poll reports	No returns received
[redacted] - Post Poll reports	Return received [redacted] and was under £250k
[redacted] - Post Poll reports	Now aware spent over £250k & submitted late without auditors certificate
[redacted] - Pre&Post Poll reports	No returns received
[redacted]	No returns received
[redacted]	No returns received
A052592 - The Bruges Group	No returns received
[redacted]	No returns received
[redacted]	Submitted on time [redacted] and expenditure over £250k
[redacted] - EU Ref Return incomplete / incorrect	This has now been passed on.

[redacted]
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
www.electoralcommission.org.uk
Make sure you are registered to vote
Follow us on Twitter
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---------- Original Message ----------
From: PEF Inbox
Received: 18/04/2016 17:01
To: Robert Oulds; Robert Oulds; The Bruges Group
Subject: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Dear Mr Oulds,

Please find attached confirmation that The Bruges Group has been registered as a campaigner for the Referendum on the UK's membership of the EU.

If you have any further questions please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
[redacted]
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Please consider the environment before printing this email.

---------- Original Message ----------
From: Robert Oulds
Received: 18/04/2016 17:04
To: PEF Inbox
Subject: Re: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Thanks you very much.

Best wishes,

---------- Original Message ----------
From: PEF Inbox
Sent: Monday, April 18, 2016 5:01 PM
To: mailto[redacted]
Subject: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Dear Mr Oulds,

Please find attached confirmation that The Bruges Group has been registered as a campaigner for the Referendum on the UK's membership of the EU.

If you have any further questions please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
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[redacted]
Fax: 020 7271 0665
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www.aboutmyvote.co.uk

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---------- Original Message ----------
From: [redacted]
Received: 25/04/2016 16:05
To: Robert Oulds; Robert Oulds; The Bruges Group
Subject: RE: Electoral register

Dear Mr Oulds,

Thank you for your email.

You can find the electoral register request form on our website, please see the link:

http://www.electoralcommission.org.uk/__data/assets/word_doc/0007/197674/Register-Request-form-EU-Referendum.doc

In Great Britain, the form must be completed and submitted to the Electoral Registration Officer of the voting area. Should you wish to access copies of the electoral register in more than one local authority, a separate form must be submitted for each request. Contact details for each Electoral Registration Officer can be found in the link:

http://www.aboutmyvote.co.uk/register-to-vote/find-your-local-authority

In Northern Ireland, the registers are maintained by the Chief Electoral Officer for Northern Ireland, but are supplied at a local level. Any requests in Northern Ireland should be made to the relevant Area Electoral Office. If you wish to access copies of the electoral register covering more than one Area Electoral Office, you will need to make separate requests.

trust this is helpful. If you have any further queries, please do not hesitate to get back to us on 0333 103 1928 or at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Please consider the environment before printing this email.

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 25 April 2016 09:54
To: PEF Inbox
Subject: Electoral register

Dear Sir or Madam,

Hi, I understand that there is a form by which we can request that local authorities send us, as registered campaigners in the referendum, the electoral register.

Please send me this form and guidance on how to apply for these.

I look forward to hearing from you.

Best wishes,

Robert Oulds
Director of the Bruges Group
214 Linen Hall
162 - 168 Regent Street
London W1B 5TB
UK

Tel: [redacted] **Mob:** [redacted]
www.brugesgroup.com

---------- Original Message ----------
From: [redacted]
Received: 26/04/2016 10:31
To: Robert Oulds; Robert Oulds; The Bruges Group
Subject: RE: Electoral register

Dear Mr Oulds,

As a registered campaigner you must complete pre-poll reporting ahead of the referendum on the 23 June. For each pre-poll report you must submit details of all donations or loans over £7,500 during each reporting period; this includes donations received or loans entered into before you become a registered campaigner, provided they are given for the purposes of the campaign. The first of these pre-poll reports is due on the 28 April for the period 1 February – 21 April. You can find further detail on pre-poll reporting in our guidance, here. Please note that for all donations and loans with a value of more than £500 you must check the permissibility of the donor, more information on which you can find here.

After the referendum registered campaigners are required to again submit details of all donations and loans over £7,500 (from 1 February to polling day) as well as the total value of donations accepted and the total value of loans entered into that were over £500 which were not otherwise included in the reports. You can find full more information on reporting donations and loans in our guidance, as well as an overview of reporting deadlines at the EU Referendum.

If you have any further queries, please do not hesitate to get back to us on 0333 103 1928 or at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Please consider the environment before printing this email.

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 25 April 2016 16:54
To: [redacted]
Subject: Re: Electoral register

Hi,

Am I correct in understanding that only donations of £7,500 and more than need to be reported?

---------- Original Message ----------
From: Robert Oulds
Sent: Monday, April 25, 2016 4:45 PM
To: [redacted]
Subject: Re: Electoral register

Dear [redacted]

Thank you, that is very helpful.

---------- Original Message ----------
From: [redacted]
Sent: Monday, April 25, 2016 4:05 PM
To: mailto [redacted]
Subject: RE: Electoral register

Dear Mr Oulds,

Thank you for your email.

You can find the electoral register request form on our website, please see the link:

http://www.electoralcommission.org.uk/__data/assets/word_doc/0007/197674/Register-Request-form-EU-Referendum.doc

In Great Britain, the form must be completed and submitted to the Electoral Registration Officer of the voting area. Should you wish to access copies of the electoral register in more than one local authority, a separate form must be submitted for each request. Contact details for each Electoral Registration Officer can be found in the link:

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I trust this is helpful. If you have any further queries, please do not hesitate to get back to us on 0333 103 1928 or at pef@electoralcommission.org.uk.

Kind regards,

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Fax: 020 7271 0665
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---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 25 April 2016 09:54
To: PEF Inbox
Subject: Electoral register

Dear Sir or Madam,

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Please send me this form and guidance on how to apply for these.

I look forward to hearing from you.

Best wishes,

Robert Oulds
Director of the Bruges Group
214 Linen Hall
162 - 168 Regent Street
London W1B 5TB
UK

Tel: [redacted] **Mob:** [redacted]
www.brugesgroup.com

---------- Original Message ----------
From: PEF Inbox
Received: 29/04/2016 15:22
To: Robert Oulds; Robert Oulds; The Bruges Group
Subject: RE: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Dear Mr Oulds,

Thank you for your email.

Registered campaigners are only permitted to register one person as the Responsible Person and one person as Secretary. However, these posts can be filled by the same person or different people.

Please see page 14 of this guidance document.

The responsible person can authorise people in writing to incur costs. Authorisations can relate to spending on particular items, or up to a particular amount. These rules are in place to make sure that spending can be controlled and accurately recorded and reported.

You should make sure that your volunteers and campaigners are aware of who can and cannot incur costs.

I trust this is helpful. If you have any further queries, please do not hesitate to get back to us on 0333 103 1928 or at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Please consider the environment before printing this email.

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 28 April 2016 18:55
To: PEF Inbox
Subject: Re: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Hi,

Is it possible for I to be registered as the Responsible Person and / or Secretary of a registered campaign body in the EU referendum?

Please let me know. I look forward to hearing from you.

Best wishes,

Robert Oulds
Director of the Bruges Group
214 Linen Hall
162 - 168 Regent Street
London W1B 5TB
UK

Tel: [redacted] **Mob:** [redacted]
www.brugesgroup.com

---------- Original Message ----------
From: Robert Oulds
Sent: Monday, April 18, 2016 5:04 PM
To: PEF Inbox
Subject: Re: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Thanks you very much.

Best wishes,

---------- Original Message ----------
From: PEF Inbox
Sent: Monday, April 18, 2016 5:01 PM
To: mailto [redacted]
Subject: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Dear Mr Oulds,

Please find attached confirmation that The Bruges Group has been registered as a campaigner for the Referendum on the UK's membership of the EU.

If you have any further questions please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
[redacted]
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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---------- Original Message ----------
From: PEF Inbox
Received: 04/05/2016 14:18
To: Robert Oulds; Robert Oulds; The Bruges Group
Subject: RE: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Dear Robert,

All registered campaigners must have a 'responsible person' who is responsible for making sure that the campaigner's finances comply with the rules on spending, donations and loans.

As previously noted, only the responsible person registered with us and people authorised in writing by the responsible person can incur costs relating to referendum spending. You can find more information on campaign spending for the EU Referendum, here.

The responsible person also has a legal responsibility to make sure that their organisation follows the rules on donations and loans. This includes maintaining suitable systems within the organisation to ensure donations and loans are dealt with correctly. These systems regard the recording and reporting of donations and loans as well as for checking the permissibility of their source. Other officers within the organisation should give relevant information to the responsible person if reasonably required to do so. You can find our guidance on donations for EU Referendum campaigners, here, and for loans, here. You can find guidance on permissibility, here.

The responsible person is legally responsible for all reports to submitted to the Electoral Commission (regarding campaign spending and the reporting of donations and loans), which they must sign-off.

The organisation's secretary (or the individual with overall responsibility for the administrative affairs of the organisation if there is no named secretary), is responsible for authorising the application to register as a referendum campaigner, but otherwise has no specific role in complying with the rules on spending, donations and reporting.

If you have any further queries, please do not hesitate to get back to us on 0333 103 1928 or at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
Fax: 020 7271 0665

www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Please consider the environment before printing this email.

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 29 April 2016 18:44
To: PEF Inbox
Subject: Re: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Dear [redacted]

Thanks, that is very helpful.

What is the role of the Secretary?
Is there more information on the role of the Authorised person?

Please let me know. I look forward to hearing from you.

Thanks

---------- Original Message ----------
From: PEF Inbox
Sent: Friday, April 29, 2016 3:22 PM
To: mailto [redacted]
Subject: RE: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Dear Mr Oulds,

Thank you for your email.

Registered campaigners are only permitted to register one person as the Responsible Person and one person as Secretary. However, these posts can be filled by the same person or different people.

Please see page 14 of this guidance document.

The responsible person can authorise people in writing to incur costs. Authorisations can relate to spending on particular items, or up to a particular amount. These rules are in place to make sure that spending can be controlled and accurately recorded and reported.

You should make sure that your volunteers and campaigners are aware of who can and cannot incur costs.

I trust this is helpful. If you have any further queries, please do not hesitate to get back to us on 0333 103 1928 or at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
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London
EC1Y 8YZ
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Please consider the environment before printing this email.

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 28 April 2016 18:55
To: PEF Inbox
Subject: Re: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Hi,

Is it possible for two people to be registered as the Responsible Person and / or Secretary of a registered campaign body in the EU referendum?

Please let me know. I look forward to hearing from you.

Best wishes,

Robert Oulds
Director of the Bruges Group
214 Linen Hall
162 - 168 Regent Street
London W1B 5TB
UK

Tel: [redacted] **Mob:** [redacted]
www.brugesgroup.com

---------- Original Message ----------
From: Robert Oulds
Sent: Monday, April 18, 2016 5:04 PM
To: PEF Inbox
Subject: Re: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Thanks you very much.

Best wishes,

---------- Original Message ----------
From: PEF Inbox
Sent: Monday, April 18, 2016 5:01 PM
To: mailto[redacted]
Subject: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Dear Mr Oulds,

Please find attached confirmation that The Bruges Group has been registered as a campaigner for the Referendum on the UK's membership of the EU.

If you have any further questions please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
[redacted]
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Please consider the environment before printing this email.

---------- Original Message ----------
From: PEF Inbox
Received: 17/05/2016 11:47
To: Robert Oulds; Robert Oulds; The Bruges Group
Subject: RE: Distribution of literature

Dear Robert,

We encourage active participation by campaigners as part of a healthy democracy, and it is the Electoral Commission's view that during the referendum, individuals or organisations can campaign for a particular outcome. That is subject to these campaigners complying with certain rules on spending and donations.

Our guidance makes clear that campaigners are able to work together and this can contribute to an effective campaign for a particular outcome. Working together means spending money as a result of a coordinated plan or arrangement between two or more campaigners during the referendum period that is intended to, or is otherwise in connection with, promoting or bringing about a particular outcome in the referendum. There are spending rules that apply if you or a campaigner that you are working with spends money as part of a coordinated plan or arrangement. If you work together with other non-lead campaign groups then the combined amount of referendum spending you each incur will count towards the spending limits for each campaigner involved. When you work together in a joint campaign with a designated lead campaigner all the spending counts towards the lead campaign group's spending limit.

Last week we released a campaigner update which sort to clarify some common queries we have had from campaigners. Amongst these was a section clarifying our position on volunteering at street stalls, similar to that which you set out in your email. On this subject the update states that "If the volunteers are acting as part of a coordinated plan or arrangement agreed to by the campaigner groups then this is likely to be working together. If however, the volunteers spontaneously combine their stalls with no coordination by the campaigners and no agreed plan then this is unlikely to constitute working together". You can find the campaigner update, here.

If you have any further queries, please do not hesitate to get back to us on 0333 103 1928 or at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Please consider the environment before printing this email.

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 08 May 2016 20:55
To: PEF Inbox
Subject: Distribution of literature

Dear [redacted]

We would be grateful if you would clear up a misunderstanding which is developing.

It is being put about that the Electoral Commission is in some way forbidding local campaigners from distributing leaflets from the Leave movement as a whole and, indeed, forbidding them from displaying or distributing material from more than one registered campaign organisation.
Obviously, these activists are just ordinary members of the public who are campaigning in their town and are not the property of any particular organisation. Local groups will be made up of supporters of various parties and organisations.

They will need to have a selection of literature from different points of view. For instance, if someone comes up and asks about trades unions' views, they will need a trade unionists' leaflet. But some people seem to have the fear that they must tell people to go to the next town where there might be another group who might have only left wing literature.

It may sound absurd that people believe this is the case but we have even heard people who believe that they must not even recommend viewing on YouTube a video produced by another group as they believe that the production costs will be counted against all of the groups whose members have watched or shared the video.

An unhealthy paranoia is setting in. Some people are even saying that there is a conspiracy to disrupt the natural organic activity of an informal democratic movement.

We would be very grateful for a simple statement that tells the public who are engaged in campaigning that they are totally free to distribute whatever literature they like so long as it carries a legal imprint and is properly accounted for and that the expense of production will only be counted once.

We appreciate that the rules are necessary to prevent large groups creating imaginary front organisations but this must have been dealt with when campaign organisations were recognised.

I look forward to hearing from you.
Thanks

---------- Original Message ----------
From: PEF Inbox
Sent: Wednesday, May 4, 2016 2:18 PM
To: 'Robert Oulds'
Subject: RE: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Dear Robert,

All registered campaigners must have a ‘responsible person’ who is responsible for making sure that the campaigner’s finances comply with the rules on spending, donations and loans.

As previously noted, only the responsible person registered with us and people authorised in writing by the responsible person can incur costs relating to referendum spending. You can find more information on campaign spending for the EU Referendum, here.

The responsible person also has a legal responsibility to make sure that their organisation follows the rules on donations and loans. This includes maintaining suitable systems within the organisation to ensure donations and loans are dealt with correctly. These systems regard the recording and reporting of donations and loans as well as for checking the permissibility of their source. Other officers within the organisation should give relevant information to the responsible person if reasonably required to do so. You can find our guidance on donations for EU Referendum campaigners, here, and for loans, here. You can find guidance on permissibility, here.

The responsible person is legally responsible for all reports to submitted to the Electoral Commission (regarding campaign spending and the reporting of donations and loans), which they must sign-off.

The organisation’s secretary (or the individual with overall responsibility for the administrative affairs of the organisation if there is no named secretary), is responsible for authorising the application to register as a referendum campaigner, but otherwise has no specific role in complying with the rules on spending, donations and reporting.

If you have any further queries, please do not hesitate to get back to us on 0333 103 1928 or at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

Putting voters first

Please consider the environment before printing this email.

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 29 April 2016 18:44
To: PEF Inbox
Subject: Re: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Dear [redacted]

Thanks, that is very helpful.

What is the role of the Secretary?
Is there more information on the role of the Authorised person?

Please let me know. I look forward to hearing from you.

Thanks

---------- Original Message ----------
From: PEF Inbox
Sent: Friday, April 29, 2016 3:22 PM
To: mailto [redacted]
Subject: RE: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Dear Mr Oulds,

Thank you for your email.

Registered campaigners are only permitted to register one person as the Responsible Person and one person as Secretary. However, these posts can be filled by the same person or different people.

Please see page 14 of this guidance document.

The responsible person can authorise people in writing to incur costs. Authorisations can relate to spending on particular items, or up to a particular amount. These rules are in place to make sure that spending can be controlled and accurately recorded and reported.

You should make sure that your volunteers and campaigners are aware of who can and cannot incur costs.

I trust this is helpful. If you have any further queries, please do not hesitate to get back to us on 0333 103 1928 or at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Please consider the environment before printing this email.

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 28 April 2016 18:55
To: PEF Inbox
Subject: Re: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Hi,

Is it possible for two people to be registered as the Responsible Person and / or Secretary of a registered campaign body in the EU referendum?

Please let me know. I look forward to hearing from you.

Best wishes,

Robert Oulds
Director of the Bruges Group
214 Linen Hall
162 - 168 Regent Street
London W1B 5TB
UK

Tel: [redacted] **Mob:** [redacted]
www.brugesgroup.com

---------- Original Message ----------
From: Robert Oulds
Sent: Monday, April 18, 2016 5:04 PM
To: PEF Inbox
Subject: Re: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Thanks you very much.

Best wishes,

---------- Original Message ----------
From: PEF Inbox
Sent: Monday, April 18, 2016 5:01 PM
To: mailto[redacted]
Subject: Confirmation of Registration as Referendum Campaigner - The Bruges Group

Dear Mr Oulds,

Please find attached confirmation that The Bruges Group has been registered as a campaigner for the Referendum on the UK's membership of the EU.

If you have any further questions please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail at pef@electoralcommission.org.uk.

Kind regards,

[redacted]
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
[redacted]
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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

Dear Mr Oulds

Referendum on the UK's membership of the European Union: Referendum Result Event

As a registered campaigner for the upcoming referendum, you are invited to attend the result event which will be held in Manchester Town Hall on **23 June 2016**.

The Town Hall will be host for both the:

- North West of England regional collation and result declaration; and
- National count collation and result declaration

All attendees are required to register in advance to gain access to the venue on the night. The registration deadline is **midnight on 26 May 2016.**

Members of your campaign group can accredit online in the following way:

Step one:	Go to https://www.eureferendumcountevent.org.uk
Step two:	In 'Option 1' enter your unique code: **AQBEMD** *(this code should not be shared outside of your organisation)*
Step three:	Complete your information and press submit to register.

Once you have registered you will receive a booking confirmation and password which will allow you to go back and review your details and make any amendments if required.

Closer to the event date you will be sent information by email on how and when to collect your pass, together with venue access information.

If you have any questions regarding completing your online application, please email registration@eureferendumcountevent.org.uk or telephone **03456 522800.** Alternatively, if you have any other queries about the event please do feel free to contact us at: press@electoralcommission.org.uk or telephone **020 7271 0704.** There will also be regional count and collation events across England, with count venues also in place in Scotland, Wales and Northern Ireland. You will need to contact the relevant region separately if you wish to attend these counts.

Yours sincerely

The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ

Tel: 0333 103 1928
www.electoralcommission.org.uk

Putting voters first



Please consider the environment before printing this email.

---------- Original Message ----------
From: [redacted]
Received: 11/01/2017 17:23
To: [redacted]
Subject: FW: The Bruges Group - 4079 Declaration and Invoices

Can we discuss?
Thanks

---------- Original Message ----------
From: [redacted]
Sent: 09 January 2017 09:14
To: [redacted]
Cc: [redacted]
Subject: FW: The Bruges Group - 4079 Declaration and Invoices

Good morning gents,
Robert Oulds of The Bruges Group sent his EU Ref declaration & invoices to the PEF inbox on 23rd September as per his e-mail below.

Can you let me know what record we have on this as he now wants an explanation as to why we have opened an investigation. He left a voice message on Friday evening.

Cheers

[redacted]

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 06 January 2017 20:33
To: [redacted]
Subject: Fw: The Bruges Group - 4079 Declaration and Invoices

From: Robert Oulds
Sent: Friday, January 6, 2017 8:28 PM
To: [redacted]
Subject: Fw: The Bruges Group - 4079 Declaration and Invoices

Submitted via email on 23rd September!

---------- Original Message ----------
From: Robert Oulds
Sent: Friday, September 23, 2016 10:10 PM
To: PEF Inbox
Subject: The Bruges Group - 4079 Declaration and Invoices

Dear Sir or Madam,

Please find attached the referendum returns form and relevant invoices.

Best wishes,

Robert Oulds
Director of the Bruges Group
214 Linen Hall
162 - 168 Regent Street
London W1B 5TB
UK

Tel: [redacted] **Mob:** [redacted]
www.brugesgroup.com

---------- Original Message ----------
From: [redacted]
Received: 12/01/2017 06:36
To: [redacted]
Subject: FW: The Bruges Group - 4079 Declaration and Invoices

Further e-mail form Robert Oulds concerning post-poll reports he sent to the PEF inbox – followed by our post-poll reporting investigation

[redacted]

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 11 January 2017 17:50
To: [redacted]
Subject: Re: The Bruges Group - 4079 Declaration and Invoices

Dear [redacted]

Further to my emails which show they declaration was sent on Friday 23rd September. My email program on my laptop clearly shows it was sent from the email the Electoral Commission contact me at [redacted] I am not an expert but I presume that one of several scenarios took place.

1) The email and accompanying declaration has been deleted by the EC, or 2) it went into junk mail by your spam filter, or 3) was placed into quarantine by your virus protection program, or 4) was rejected by your email server, or 5) it was rejected by your internet service provider (ISP).

I would say that the latter scenarios are the most likely as I sent a lot of information and many different files, but I did not get a bounce back. I cannot say what happened at your and can only confirm that it was sent but not what happened beyond that; your IT department and / or ISP or those who handle your servers may be able to tell you what happened.

Please also find attached an itemised phone bill from my mobile which clearly shows the three phone calls [redacted] that I made to the Electoral Commission on 23rd September totalling nearly 17 minutes where I informed the Electoral Commission that I was sending the forms that day so they were expected (we discussed deadlines) where they were to be sent (the PEF email address) but we also agreed the format in which I should send them, the excel form with attached invoices. I also received advice on how to complete the declaration. You may have a record of these calls. Please keep the phone bill private as it is personal.

You have now personally have the details of what was sent on 23rd September. I trust I can leave them with you to process. You will note from the files that I have forwarded to you that the declaration was completed no later than 23rd September. Simply right click on the file, select properties, select details and you will see the date when the original files were finalised.

I have been an election agent on two previous occasions, one GE and one local, and Chairman of two constituency associations and rightly take my duties seriously, so I was very shocked and surprised by the letter. Apologies of I was short in the voicemail and in other emails.
Please feel free to call me Robert and let me know if I can help in any other way with this.

PS
I would like to have a chat about the media angle mentioned in your letter.

Best wishes,

Robert Oulds
Director of the Bruges Group
214 Linen Hall
162 - 168 Regent Street
London W1B 5TB
UK

Tel: [redacted] **Mob:** [redacted]
www.brugesgroup.com

---------- Original Message ----------
From: [redacted]
Sent: Monday, January 9, 2017 9:30 AM
To: 'Robert Oulds'
Subject: RE: The Bruges Group - 4079 Declaration and Invoices

Dear Mr Oulds,
Thank you for your prompt reply and for forwarding the e-mail and attachments below. I also note your voice mail left on the evening of 6 January.

The apparent late reporting for EU Referendum post-poll reporting was forwarded to me internally by our compliance team. I have sent an enquiry to try to establish what may have happened with respect to the e-mail sent to the PEF Inbox on the 23 September. I will respond to you with an explanation at the earliest opportunity.

Regards

[redacted]
Political Finance & Regulation
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
[redacted]
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 06 January 2017 20:33
To: [redacted]
Subject: Fw: The Bruges Group - 4079 Declaration and Invoices

From: Robert Oulds
Sent: Friday, January 6, 2017 8:28 PM
To: [redacted]
Subject: Fw: The Bruges Group - 4079 Declaration and Invoices

Submitted via email on 23rd September!

---------- Original Message ----------
From: Robert Oulds
Sent: Friday, September 23, 2016 10:10 PM
To: PEF Inbox
Subject: The Bruges Group - 4079 Declaration and Invoices

Dear Sir or Madam,

Please find attached the referendum returns form and relevant invoices.

Best wishes,

Robert Oulds
Director of the Bruges Group
214 Linen Hall
162 - 168 Regent Street
London W1B 5TB
UK

Tel: [redacted] **Mob:** [redacted]
www.brugesgroup.com

---------- Original Message ----------
From: [redacted]
Received: 17/01/2017 09:39
To: [redacted]
Subject: RE: The Bruges Group - 4079 Declaration and Invoices

Good morning Robert,
I'm grateful for the further information.

I am back in office and will speak with the Compliance Team manager to confirm the reports you sent directly to me have been approved.

It does appear the rejected e-mail is then the mostly likely cause of the Commission's non-receipt of the expenditure reports.

I'll work to conclude the report as soon as possible.

Regards

[redacted]

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 16 January 2017 11:43
To: [redacted]
Subject: Re: The Bruges Group - 4079 Declaration and Invoices

Dear [redacted]

I managed on Friday to run my online backup, getting this to load.
It appears that your email server rejected my email at 10.13pm on 23rd September.

This is a delivery failure notification message indicating that
an email you addressed to email address :
-- pef@electoralcommission.org.uk

could not be delivered. The problem appears to be :
-- Recipient email server rejected the message

Additional information follows :
-- 5.3.4 Message size exceeds fixed maximum message size

This condition occurred after 1 attempt(s) to deliver over
a period of 0 hour(s).

---------- Original Message ----------
From: Robert Oulds
Sent: Thursday, January 12, 2017 1:58 PM
To: [redacted]

Subject: Re: The Bruges Group - 4079 Declaration and Invoices

Great, thanks.

---------- Original Message ----------
From: [redacted]
Sent: Thursday, January 12, 2017 1:56 PM
To: 'Robert Oulds'
Subject: RE: The Bruges Group - 4079 Declaration and Invoices

Hi Robert,
To confirm, I did forward all the details you sent to me initially.

Regards,

[redacted]

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 12 January 2017 13:37
To: [redacted]
Subject: Re: The Bruges Group - 4079 Declaration and Invoices

Hi, Thanks, I presume they now also have all the relevant forms and invoices.

Best wishes,
Robert Oulds

---------- Original Message ----------
From: [redacted]
Sent: Thursday, January 12, 2017 1:22 PM
To: 'Robert Oulds'
Subject: RE: The Bruges Group - 4079 Declaration and Invoices

Thank you again Robert for the detailed reply and the further information you provided.

On Monday 9th, I did request the Commission's compliance team respond with an explanation and have forwarded your further communication to the team manager today.

I am out of office until Tuesday 17th January and will chase up a response upon my return. Please my apologies for the delay while this matter is being considered.

Regards

[redacted]
Political Finance & Regulation
The Electoral Commission

3 Bun ıill Row
Londo ı
EC1Y 8YZ
[redacted]
Fax: 020 7271 0665
www. ɛlectoralcommission.org.uk
www. ıboutmyvote.co.uk

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Pl ɛase consider the en vironment before pri ıting this ɛmail.

-------- ---------- Original Message ----------
From: Robert Oulds [mailt ɔ] [redacted]
Sent: 11 January 2017 17:50
To: [redacted]
Subje ɛt: Re: The Bruges ɛroup - 4079 Declar ıtion and Invoices

Dear [redacted]

Further to my emails which show they declaration was sent on Frid ıy 23rd Septe nber. My email prog ɛam on my laptop cl ɛarly shows it was sent from the email the El ɛctoral Commission ɛontact me at [redacted]. I am not an expert but I presume that one of sev ɛral scena ios took place.
1) The email and accompanying declaration has been deleted by the EC, or 2) it went i ıto junk mail by you ˙ spam filt ɛr, or 3) w ıs placed into quarantine by your virus protection program, or 4) was r ɛjected by your email server, or 5) it was reject d by your internet s ɛrvice pro ider (ISP).
I woul ł say that the latter scenarios are the most likely as I sent a l ɔt of infor ıation and m ıany different files, but I did not get a bou ıce back. I cannot say what happe ıed at your and can only confirm that it ɛas sent but not what happened beyon ł that; your IT depar ɛment and / or ISP o ˙ those who handle your servers may be abl ɛ to tell you what happened.

Pleas ɛ also find attached ın itemise l phone bill from my mobile which clearly shows the three phone calls [redacted] that I ıade to the Electoral Commission on 23rd September totalling n ɛarly 17 minutes wh ɛre I infor ıed the Electoral Commission that I was sending the f ɔrms that ıay so they were expected (we discuss ɛd deadlines) where they we ɛ to be sent (the PEF email address) bu ɛ we also a ɡreed the format in ɛhich I should send t ıem, the excel form with attac ıed invoic ɛs. I also received advice on h ɔw to com ɔlete the declaration. You may have a record of these calls. Plea ɛe keep the phone bill private as it is personal.

You have now personally have the details of what was sent on 23rd September. I trust I can leave them with you to process. You will note from the files that I have forwarded to you that the declaration was completed no later than 23rd September. Simply right click on the file, select properties, select details and you will see the date when the original files were finalised.

I have been an election agent on two previous occasions, one GE and one local, and Chairman of two constituency associations and rightly take my duties seriously, so I was very shocked and surprised by the letter. Apologies of I was short in the voicemail and in other emails.
Please feel free to call me Robert and let me know if I can help in any other way with this.

PS
I would like to have a chat about the media angle mentioned in your letter.

Best wishes,

Robert Oulds
Director of the Bruges Group
214 Linen Hall
162 - 168 Regent Street
London W1B 5TB
UK

Tel: [redacted] **Mob:** [redacted]
www.brugesgroup.com

---------- Original Message ----------
From: [redacted]
Sent: Monday, January 9, 2017 9:30 AM
To: 'Robert Oulds'
Subject: RE: The Bruges Group - 4079 Declaration and Invoices

Dear Mr Oulds,

Thank you for your prompt reply and for forwarding the e-mail and attachments below. I also note your voice mail left on the evening of 6 January.

The apparent late reporting for EU Referendum post-poll reporting was forwarded to me internally by our compliance team. I have sent an enquiry to try to establish what may have happened with respect to the e-mail sent to the PEF Inbox on the 23 September. I will respond to you with an explanation at the earliest opportunity.

Regards

[redacted]
Political Finance & Regulation

The Electoral Commission
3 Bun ıill Row
Londo ɔ
EC1Y 8YZ
[redacted]
Fax: 020 7271 0665
www. ɛlectoralcommission.org.uk
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P Please consider the en ıironment before pri ıting this email.

-------- ---------- Original Message ----------·

From: Robert Oulds [mailt ɔ [redacted]
Sent: ɔ1 July 2015 10:28
To: [redacted]
Subje ɛt: Lead Campaign Group des ignation p ɔcess and timetable

Dear [redacted],

Pleas ɛ can you confirm if my understanding of the referendum process is correct. I look forward to hearing from you.

My un ɗerstanding is set out below.

Any c ımpaigner may spend up to £10,000 duri ıg the ca ıpaign. Anyone wishing to spend more must register with the El ɛctoral Commission

There will be a maximum spend. The figure, w ıich is yet ɔo be deci ɗed, will b ɛ in the £millio ı. This maximum fig ɹre will be a total for all on the same sid ɛ. How thi ɜ will be pro portioned and worked out will ɔe by Stat ɹtory Instr ıment which has yet to be made.

The b ılk of the funding will be made by the offi ɔial designated campaign which will also receive taxpayer fund ɜ, the right to public ıalls and ı legal right to airtim ɛ and the po ɯer to designate wh ɔ are the ıfficial representatives of the c ımpaign.

It is the role of the Electoral Commission to makes sure that access to the media is fair. There will have to be balance so that coverage of the referendum is equal between the two official sides.

The Electoral Commission say that role of the media in a referendum is to provide information for the public on the referendum issues and ensure scrutiny and analysis of the process and the campaign arguments. The media also provides a forum for a wide range of referendum viewpoints from across society.

For a representative of political parties they can only get the percentage of time according to what they received at the last general election, divided by half according to which side they are on. This will restrict representatives of political parties gaining broadcast media coverage unless they are put on as representatives by the official campaign.

This is also yet to be confirmed by Statutory Instrument. The minister will be obliged to follow the guidance of the electoral commission when deciding this. T

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

From: [redacted]
Sent: 01 July 2015 11.31
To: Robert Oulds
Subject: Lead Campaign Group designation process and timetable

Dear Mr Oulds,

Thank you for your enquiry.

Please note that at this stage the EU Referendum Bill is still progressing through Parliament and may change substantially before it is finalised at Royal Assent. The advice in this email is based in the Bill as currently drafted and we will be able to give you more detailed advice after Royal Assent. We will also publish guidance in advance of the referendum so that all campaigners can ensure that they are familiar with and follow the rules. Based on the current version of the Bill we can advise the following:

The expected registration threshold is likely to be £10,000. This means that any campaigner can spend up to £10,000 on regulated campaign activities before registering with us.

At present the maximum spending as laid out in the Bill is:

For the designated lead campaigner: £7 million

The limits for political parties are set according the party's share of the vote at the last UK Parliamentary General Election.

£7 million if the party's vote share exceeds 30 percent

£5.5 Million if the party's vote share was between 20-30 percent

£4 Million if the party's vote share was between 10-20 percent

£3 Million if the party's vote share was between 5-10 percent

£700,000 if the party's vote share was less than 5 per cent. or if it has no relevant percentage

The limit for other registered campaigners is £700,000.

The Electoral Commission does not regulate access to the media. This is separately regulated by the BBC Trust and Ofcom. I would recommend contacting them for confirmation of the rules.

As neither the referendum date itself nor the dates for the referendum period have been set yet, we cannot confirm any dates or timings for registration of campaigners.

We have not published guidance on the registration of the lead campaigner. We will do so in advance of the referendum. At present we cannot provide any additional advice on this.

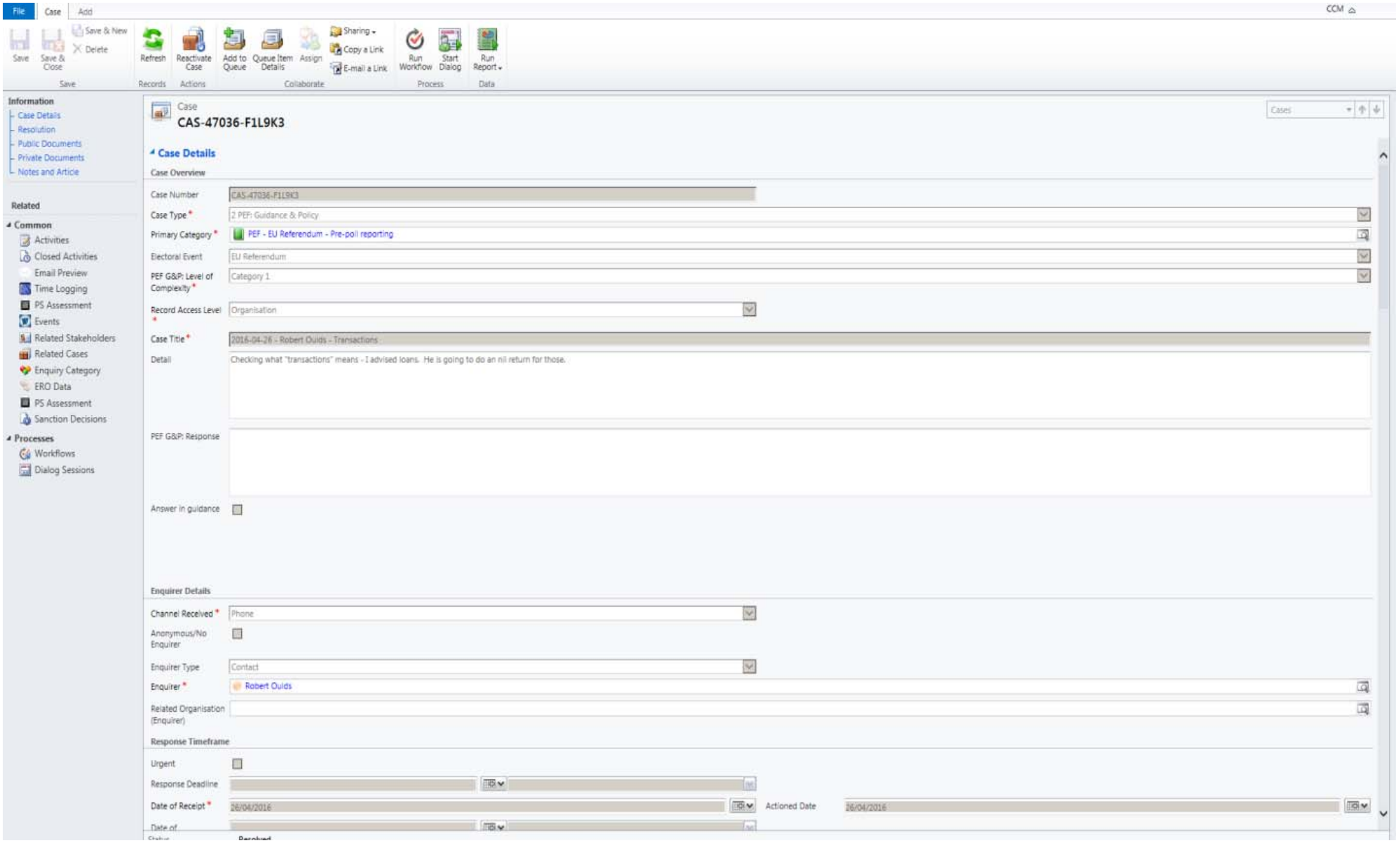
As mentioned the above guidance is based on the Bill as it currently is. This may change as the Bill progresses through Parliament. We will be keeping campaigners updated on the Bill and you can sign up for this here. We will also issue briefings on the Bill which you can find here.

I hope the above is helpful to you. If you do have any further questions, please do not hesitate to contact the party and election finance advice line on 0333 103 1928 or e-mail the party and election finance inbox at pef@electoralcommission.org.uk.

Kind regards,

[redacted]

The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
[redacted]
Fax: 020 7271 0665
www.electoralcommission.org.uk
www.aboutmyvote.co.uk Guidance Adviser


File
Case
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Save
Save & Close
Save & New
Delete
Refresh
Reactivate Case
Add to Queue
Queue Item Details
Assign
Sharing
Copy a Link
E-mail a Link
Run Workflow
Start Dialog
Run Report
Save
Records
Actions
Collaborate
Process
Data
Information
Case Details
Resolution
Public Documents
Private Documents
Notes and Article
Related
Common
Activities
Closed Activities
Email Preview
Time Logging
PS Assessment
Events
Related Stakeholders
Related Cases
Enquiry Category
ERO Data
PS Assessment
Sanction Decisions
Processes
Workflows
Dialog Sessions
Case
CAS-47036-F1L9K3
Cases
Case Details
Case Overview
Case Number
CAS-47036-F1L9K3
Case Type *
2 PEF: Guidance & Policy
Primary Category *
PEF - EU Referendum - Pre-poll reporting
Electoral Event
EU Referendum
PEF G&P: Level of Complexity *
Category 1
Record Access Level *
Organisation
Case Title *
2016-04-26 - Robert Ould - Transactions
Detail
Checking what "transactions" means - I advised loans. He is going to do an nil return for those.
PEF G&P: Response
Answer in guidance
Enquirer Details
Channel Received *
Phone
Anonymous/No Enquirer
Enquirer Type
Contact
Enquirer *
Robert Ould
Related Organisation (Enquirer)
Response Timeframe
Urgent
Response Deadline
Date of Receipt *
26/04/2016
Actioned Date
26/04/2016
Date of
Status
Resolved

---------- Original Message ----------
From: [redacted]
Received: 25/02/2016 16:05
To: Robert Oulds
Subject: RE: Nominations for media coverage

Dear Robert,

Thanks for your email.

Under the Political Parties, Elections and Referendums Act 2000, only designated lead campaigners are entitled to referendum campaign broadcasts (RCBs). General information about the rules relating to RCBs is set out in the Ofcom and BBC Trust codes for broadcasters. If a lead campaigner is designated for each outcome, broadcasters are required to carry an equal number of RCBs on both sides of the debate.

With regards to your point on political parties – "major" political parties are entitled to a number of party political broadcasts on a general, annual basis and in advance of specified elections. However, no party political broadcasts can be aired during the referendum period. As previously mentioned, only the designated lead campaigners are entitled to referendum broadcasts.

More generally speaking, broadcasters are required to report news items with 'due impartiality' under the relevant broadcaster's codes. If you require any further information on this issue or have questions about equal access to broadcast media, I would suggest contacting Ofcom and the BBC Trust directly as the oversight bodies responsible:

http://www.ofcom.org.uk/about/what-is-ofcom/contact-us/

http://www.bbc.co.uk/bbctrust/contact_us/

I trust that's helpful, but do let me know if I can assist further.

Kind regards,

[redacted]

[redacted]
Party and Election Finance
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]

www.electoralcommission.org.uk

Make sure you are registered to vote

---------- Original Message ----------
From: Robert Oulds [mailto [redacted]
Sent: 22 February 2016 10:40
To: [redacted]
Subject: Nominations for media coverage

Dear [redacted],

I understand that during the campaign period the broadcast media must give equal access to those making the case to leave and remain.

However, will that be those representing the officially designated lead groups? Or can it be from anyone form making the case for leave or remain at the discretion of the media?

Please let me know.

PS
I also understand that representatives of the political parties will also have a quota that broadcasters should allocate to them.

---------- Original Message ----------
From: [redacted]
Sent: Wednesday, February 10, 2016 7:02 PM
To: mailto [redacted]
Subject: Today's meeting

Dear Robert,

Thank you for coming today - it was good to meet you, Barry and Chris. I just wanted to follow up with a link to our EU Referendum page, which has all of the guidance we have published to date. We'll update this page with further guidance once the government make regulations setting out more of the rules, dates and deadlines. You can also sign up to our campaigner updates here:

http://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/campaigners-in-referendums

If you have any further questions about the rules, or would like to discuss the registration process, please give me a call.

Best wishes,

[redacted]

[redacted]
Party and Election Finance
The Electoral Commission
3 Bunhill Row

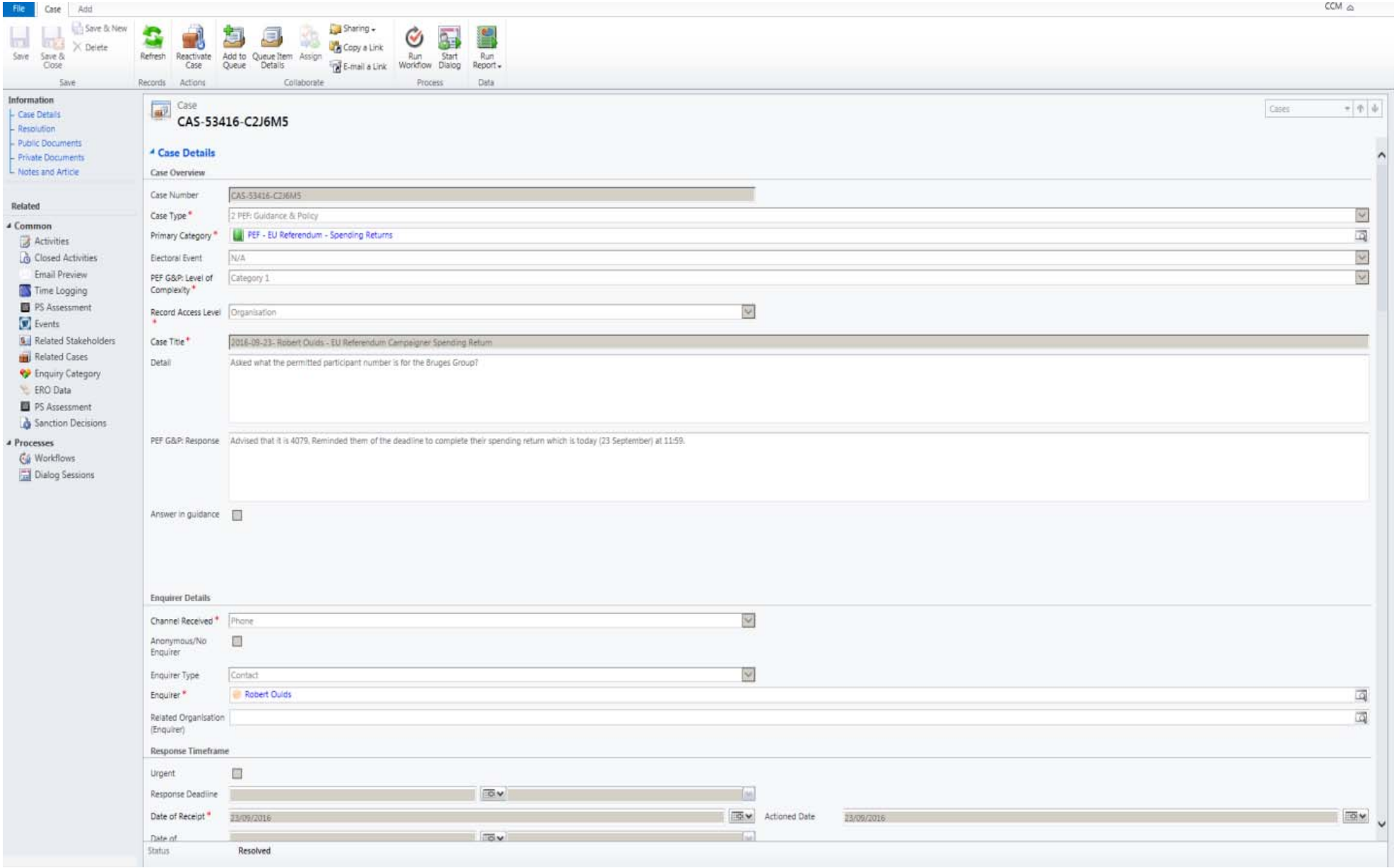
London EC1Y 8YZ
[redacted]

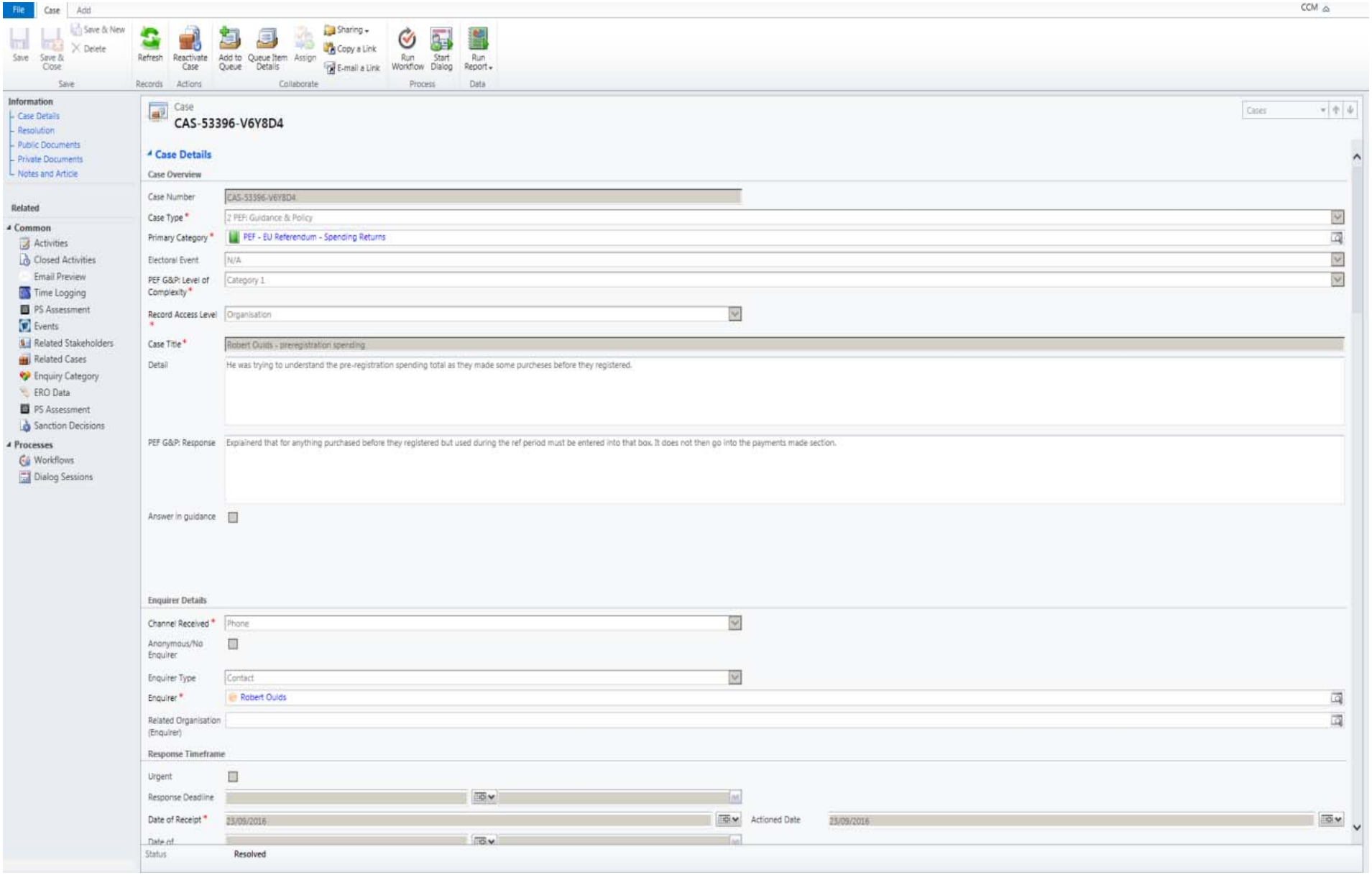
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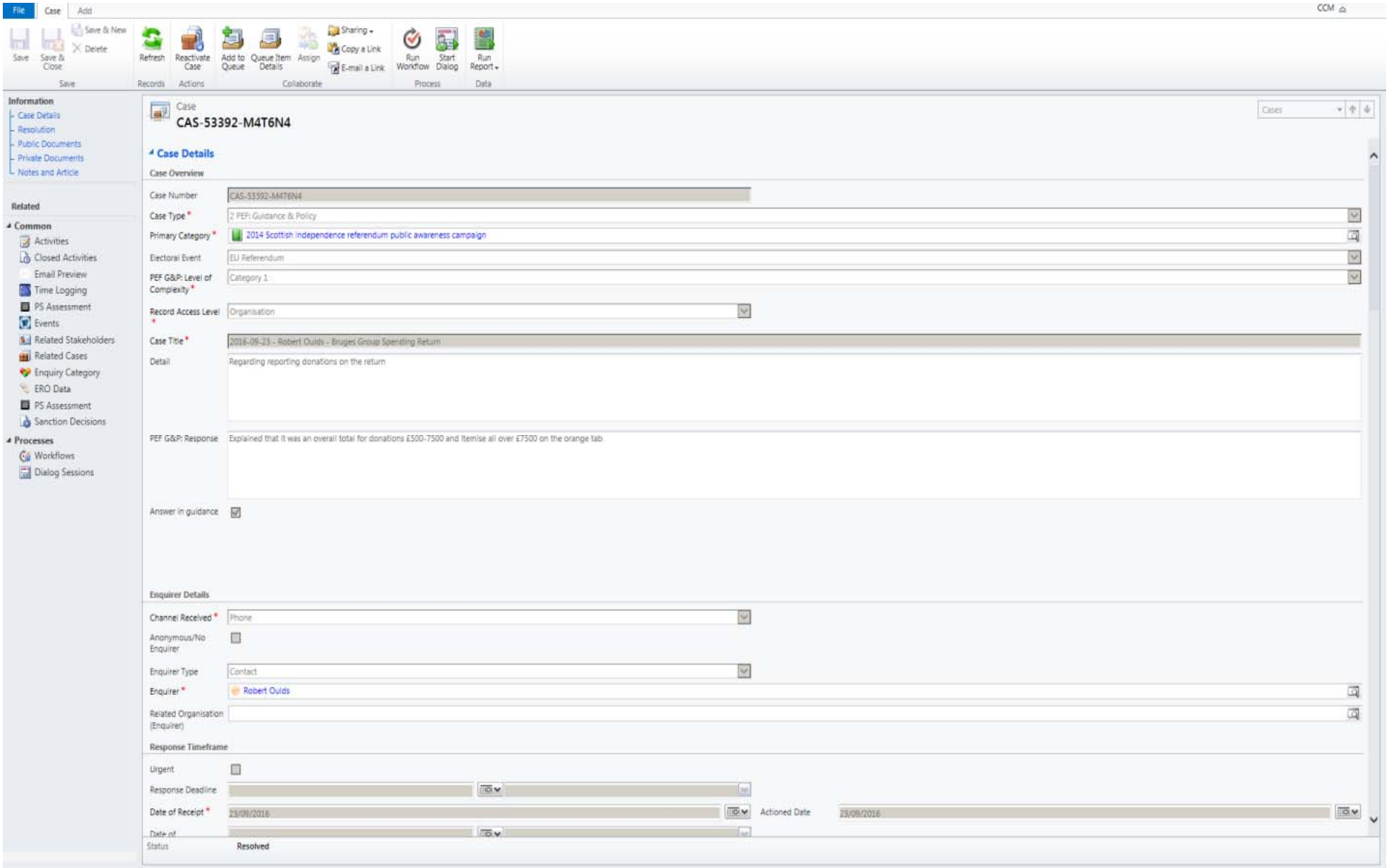
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Putting Voters First

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File
Case
Add
CCM
Save
Save & Close
Save & New
Delete
Refresh
Reactivate Case
Add to Queue
Queue Item Details
Assign
Sharing
Copy a Link
E-mail a Link
Run Workflow
Start Dialog
Run Report
Save
Records
Actions
Collaborate
Process
Data
Information
Case Details
Resolution
Public Documents
Private Documents
Notes and Article
Related
Common
Activities
Closed Activities
Email Preview
Time Logging
PS Assessment
Events
Related Stakeholders
Related Cases
Enquiry Category
ERO Data
PS Assessment
Sanction Decisions
Processes
Workflows
Dialog Sessions
Case
CAS-53416-C2J6M5
Cases
Case Details
Case Overview
Case Number
CAS-53416-C2J6M5
Case Type *
2 PEF: Guidance & Policy
Primary Category *
PEF - EU Referendum - Spending Returns
Electoral Event
N/A
PEF G&P: Level of Complexity *
Category 1
Record Access Level *
Organisation
Case Title *
2016-09-23- Robert Ould - EU Referendum Campaigner Spending Return
Detail
Asked what the permitted participant number is for the Bruges Group?
PEF G&P: Response
Advised that it is 4079. Reminded them of the deadline to complete their spending return which is today (23 September) at 11:59.
Answer in guidance
Enquirer Details
Channel Received *
Phone
Anonymous/No Enquirer
Enquirer Type
Contact
Enquirer *
Robert Ould
Related Organisation (Enquirer)
Response Timeframe
Urgent
Response Deadline
Date of Receipt *
23/09/2016
Actioned Date
23/09/2016
Date of
Status
Resolved


File
Case
Add
CCM
Save
Save & Close
Save & New
Delete
Refresh
Reactivate Case
Add to Queue
Queue Item Details
Assign
Sharing
Copy a Link
E-mail a Link
Run Workflow
Start Dialog
Run Report
Save
Records
Actions
Collaborate
Process
Data
Information
Case Details
Resolution
Public Documents
Private Documents
Notes and Article
Related
Common
Activities
Closed Activities
Email Preview
Time Logging
PS Assessment
Events
Related Stakeholders
Related Cases
Enquiry Category
ERO Data
PS Assessment
Sanction Decisions
Processes
Workflows
Dialog Sessions
Case
CAS-53396-V6Y8D4
Cases
Case Details
Case Overview
Case Number
CAS-53396-V6Y8D4
Case Type *
2 PEF: Guidance & Policy
Primary Category *
PEF - EU Referendum - Spending Returns
Electoral Event
N/A
PEF G&P: Level of Complexity *
Category 1
Record Access Level *
Organisation
Case Title *
Robert Ould's - preregistration spending
Detail
He was trying to understand the pre-registration spending total as they made some purcheses before they registered.
PEF G&P: Response
Explained that for anything purchased before they registered but used during the ref period must be entered into that box. It does not then go into the payments made section.
Answer in guidance
Enquirer Details
Channel Received *
Phone
Anonymous/No Enquirer
Enquirer Type
Contact
Enquirer *
Robert Ould's
Related Organisation (Enquirer)
Response Timeframe
Urgent
Response Deadline
Date of Receipt *
23/09/2016
Actioned Date
23/09/2016
Date of
Status
Resolved


File
Case
Add
CCM
Save
Save & Close
Save & New
Delete
Refresh
Reactivate Case
Add to Queue
Queue Item Details
Assign
Sharing
Copy a Link
E-mail a Link
Run Workflow
Start Dialog
Run Report
Save
Records
Actions
Collaborate
Process
Data
Information
Case Details
Resolution
Public Documents
Private Documents
Notes and Article
Related
Common
Activities
Closed Activities
Email Preview
Time Logging
PS Assessment
Events
Related Stakeholders
Related Cases
Enquiry Category
ERO Data
PS Assessment
Sanction Decisions
Processes
Workflows
Dialog Sessions
Case
CAS-53392-M4T6N4
Cases
Case Details
Case Overview
Case Number
CAS-53392-M4T6N4
Case Type *
2 PEF: Guidance & Policy
Primary Category *
2014 Scottish Independence referendum public awareness campaign
Electoral Event
EU Referendum
PEF G&P: Level of Complexity *
Category 1
Record Access Level *
Organisation
Case Title *
2016-09-23 - Robert Ould - Bruges Group Spending Return
Detail
Regarding reporting donations on the return
PEF G&P: Response
Explained that it was an overall total for donations £500-7500 and itemise all over £7500 on the orange tab
Answer in guidance
Enquirer Details
Channel Received *
Phone
Anonymous/No Enquirer
Enquirer Type
Contact
Enquirer *
Robert Ould
Related Organisation (Enquirer)
Response Timeframe
Urgent
Response Deadline
Date of Receipt *
23/09/2016
Actioned Date
23/09/2016
Date of
Status
Resolved

[redacted]

From: Robert Oulds [redacted]
Sent: 02 August 2017 11:51
To: [redacted]
Subject: Re: Party and Election Finance Registers - link

Follow Up Flag: Follow up
Flag Status: Completed

Dear [redacted]
Thanks, that is very easy to navigate. I can work it.
Please do let me know when the spending is up on the site.
Best wishes,
Robert
From: [redacted]
Sent: Wednesday, August 2, 2017 11:40 AM
To: 'Robert Oulds'
Subject: Party and Election Finance Registers - link

Dear Mr Oulds,

Further to our conversation just now, you can access published details of spending at any electoral event using the below link:-

http://search.electoralcommission.org.uk/

You will see that there are various options to select from in the search criteria, which you can use to focus a search on a particular electoral event or organisation.

Once you have performed a search there is the option to export results to a csv file which you can open in Excel to filter/analyse further.

Yours Sincerely,

[redacted]
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
020 7271 0533
electoralcommission.org.uk
yourvotematters.co.uk

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[redacted]

From: [redacted]
Sent: 28 July 2017 15:46
To: [redacted]
Cc:
Subject: RE: Bruges Group - for publication

Follow Up Flag: Follow up
Flag Status: Completed

Hi [redacted]

All expenditure and donations have been entered on PEF Online and redacted invoices have been uploaded.

I have not yet submitted this on PEF Online as I was unsure which date of submission to enter. Should it go down as 23 September 2016 – the date that they claim in an email on CCM to have originally submitted their return?
FW: The Bruges Group - 4079 Declaration and Invoices

The only issue I have found is the document provided for item SP0322522 (Item 2 on return) – a £500 spend – which I don't think qualifies as an invoice. A similar document was provided for SP0322532 (Item 12 on return) but as this spend was not above £200 (£200 exactly), no invoice is required for this item.

Thanks

[redacted]

From: [redacted]
Sent: 26 July 2017 17:32
To: [redacted]
Cc: [redacted]
Subject: Bruges Group - for publication

Hi [redacted]

Please could you process the below return for publication? This is a priority request and I have discussed it with [redacted] and [redacted]

This return is an update to a previously submitted return which has not been published, but already has an XML spreadsheet produced.

The Bruges Group revised return for publication

Previously completed XML sheet – I assume this can just be updated with the amendments and then uploaded into PEFO. I believe [redacted] produced this, so may be able to help you with any queries relating to the XML.

Un-redacted Invoices are here and saved in a folder entitled 'new folder', sorry - I do not have the correct permissions to rename it anything else.

Do let me know if you have any questions or identify any significant issues.

Thanks.

[redacted]