[redacted]

From: FOI
Sent: 01 February 2021 12:42
To: [redacted]
Subject: FOI 156-20 - Response
Attachments: FOI 156-20 - List of documents being released.pdf

Dear [redacted],

Our Ref: FOI-156-20

Thank you for your email to the Electoral Commission dated 14 December 2020.

The Commission aims to respond to requests for information promptly and has done so within the statutory timeframe; following an extension to that timeframe for consideration on the Public Interest Test.

Your request is shown below followed by our response.

I am writing to make a request under the Freedom of Information Act with regards to communications with non party campaigners in the 2019 general election.

Specifically I would like the following information:

All communications between the Commission and the following registered non-party campaigners listed:

1. Richard Patrick Tracey - campaign name Parent's Choice

2. Campaign Against Corbynism

3. Led By Donkeys Ltd.

4. MTCAE Limited (campaign name: Mainstream - The Campaign Against Extremism)

5. Operation Dharmic Vote

6. Working 4 UK Limited

In your response please exclude material from other sources outside the Commission (eg newspaper clippings that mention any of these groups.)

If my request is denied in whole or in part, I ask that you justify all deletions by reference to specific exemptions of the act.

Later the same day you added the following to your request:

All communications between the Commission and the following registered non-party campaigner, the Fair Tax Campaign.

Our response is as follows:

We hold information on six of the seven non-party campaigners you have requested. We do not hold information in relation to Working 4 UK Limited.

Attached is a list of the documents we are releasing. To access these you will need to use our secure document sharing system, Objective Connect.

You will receive an 'Invitation to Objective Connect Email Notification' (sent to the inbox of [redacted]). This notification will contain a link to enable you to start accessing your information. Please find below details on how to get to the specific area we have set up for your documents.

1. Click on the link in the email.
2. You will be prompted to set up your username and password. Your username will be your email address, and your password can be whatever you like.
3. With your username and password, enter both details at the login screen and click 'login'.
4. You will now see your personal page, which will show the Share 'FOI – 156-20'
5. By clicking on the name of the share, you will find your documents.
6. You may view any of these documents
7. In addition you may download a copy to your personal computer by selecting the 'download' option and then 'save'.

This service will be closed one month from our response date, this is the **1 March 2021, at 5pm.**

Exemption under Section 40

You will notice that certain personal details have been redacted from the documents we are releasing. This redaction is necessary because sections 40(2) and (3)(a) of the Freedom of Information Act 2000 (FOI) Act provides that personal data, where its disclosure would breach one of the data protection principles, is exempt from disclosure. The first data protection principle states that personal data must be processed fairly and lawfully. The Commission considers that it would be unfair to release the names and personal contact details of junior officials, who were not employed in public facing roles and did not act as spokespersons for their employer, as those individuals would have a reasonable expectation that this personal data would not be disclosed to the general public.

Exemptions under Section 30 and 31

The Commission has a statutory function to conduct investigations into potential breaches of the reporting requirements in Political Parties, Elections and Referendums Act 2000 ("PPERA").

Section 30(1)(a)(i) of the Freedom of Information Act 2000 (FOI) provides for exemption from disclosure of information which has been held at any time by a public authority for the purpose of any investigation which the authority has a duty to conduct with a view to it being ascertained whether a person should be charged with an offence. 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. In so far as the investigation related to other potential breaches of PPERA, section 31(1)(g) 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 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 investigations such as in this matter.

Applications of the section 30 and 31 exemption 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 others 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. For that reason we disclose information about closed cases which we consider is appropriate to meet that need.

In carrying out effective inquiries the Commission depends on being able to secure the co-operation 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 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 have a reasonable expectation that information provided in the course of an investigation will not be made available to the public at large. If information provided in the course of our investigation was made public under the 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 investigations which would prejudice the Commission's ability to conduct its statutory functions.

Having carefully weighed the public interest relating to possible disclosure of the information requested under sections 30(1)(a)(i) and 31(1)(g), 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 the information provided 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: https://www.electoralcommission.org.uk/freedom-information/make-a-freedom-information-request.

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

Yours sincerely

Information Officer
FOI@electoralcommission.org.uk

The Electoral Commission
electoralcommission.org.uk

The Electoral Commission

FOI 156-20 – List of documents being released

- 12 December_Redacted
- Campaign Against Corbynism address change_Redacted
- Electoral Register information and weekly reporting CCM0336867_Redacted
- FW Led By Donkeys – receipt of notification CCM0389282_Redacted
- Guidance required for the GE2019 with respect to – Draft ODV Website hosting_Redacted
- Led By Donkeys – Registration confirmation CCM0389292_Redacted
- Led by Donkeys Ltd. – Submitting notification on PEF online CCM0389288_Redacted
- Operation Dharmic Vote – Notification Decision CCM0462764_Redacted
- Re Non-Party Campaigner Notification – Mainstream UK CCM0336880_Redacted
- RE Advice on Led By Donkeys compliance-_Redacted
- RE Advice on Led By Donkeys compliance_Redacted
- Re Campaign against corbynism – Confirmation of receipt CCM 0462780_Redacted
- Re Campaign against Corbynism – Receipt of notification CCM0389264_Redacted
- Re Fair Tax Campaign Ltd – Registration CCM0288605_Redacted
- RE GE2019 Non Political Party Campaigner – Registration and guide CCM0336811_Redacted
- Re Guidance for non-party campaigners CCM0229200_Redacted
- RE HELP on submission Re Led By Donkeys – Registration confirmation CCM0389292_Redacted
- Re MTCAE Limited – Registration confirmation CCM0462741_Redacted
- Re Non-party campaigner guidance CCM0307194_Redacted
- Re Non-party campaigner guidance_Redacted
- RE Operation Dharmic Vote – receipt of notification CCM0462743-_Redacted
- RE Operation Dharmic Vote – receipt of notification CCM0462743--_Redacted
- RE Operation Dharmic Vote – receipt of notification CCM0462743---_Redacted
- RE Operation Dharmic Vote – receipt of notification CCM0462743_Redacted
- RE ParentsChoiceUK – Receipt of notification CCM0389257_Redacted

- RE Private & Confidential Led By Donkeys notes CCM0237128_Redacted
- Re RE Re Urgent – Access to Electoral Registers – Operations Dharmic Vote CCM0336942_Redacted
- RE Re[2] Urgent!_Redcated
- RE Richard Patrick Tracey – Registration confirmation CCM0389269_Redacted
- RE Spending query REFRTP8123505 CCM0336909_Redacted
- RE Submitting a nil pre-poll return_Redacted
- Re Urgent!_Redacted
- re[2] Operation Dharmic Vote – receipt of notification CCM0462743_Redacted
- Registration of Campaign Against Corbynism CCM0462781_Redacted
- Richard Patrick Tracey – campaign name CCM0389291_Redacted

From: Led By Donkeys <[redacted]>
Sent: 11 November 2019 16:21
To: PEF Inbox <pef@electoralcommission.org.uk>
Subject: 12 December

Dear Electoral Commission,

We are Led By Donkeys and we are keen to comply with all EC regulation. We would welcome a meeting in person at your convenience this week.

As a group that is likely to be spending near to the limit of what is legally allowed, we are keen to make sure we fully understand all the regulations and compliance requirements, particularly in view of the first wave of reporting coming up later in November. We will ask you about the following in the meeting:

1. Checking our understanding of the £700 spending limits and the larger limits per constituency and how the lobbying act overlays with electoral law.

2. How to avoid problems with a mobile banner touring across different constituencies as regards the overlap between national and local spending

3. Checking our first draft report on spending since last December, and checking that we can legitimately not claim any spend prior to the calling of the election as electoral spend since a General Election was not planned for December 2019 (except for our spending during the European elections).

We had made some headway in these questions and we have legal advice. However our colleague who was looking after this for us was taken ill so we are keen to make sure we are fully up to speed on all the rules we need to be.

Please let us know when we can meet at your earliest convenience

Very best wishes

James, Will, Olly and Ben

---------- Original Message ----------
From: James Bickerton
Received: 09/12/2019 08:49
To: [redacted] Partyreg
Subject: Campaign Against Corbynism address change

Dear Sir or Madam,

I run the Campaign Against Corbynism - we're registered with the Electoral Commission (our application was considered complete on 2 December). However I'm very keen to change our registered address and remove the current address from the register. When I registered the group I used my home address ([redacted]). We tried to get a correspondence address sorted before registration (one of your advisers said this should be acceptable) but unfortunately the process took too long so, not wanting to risk exceeding the £20,000 limit unregistered, I registered using my own address. The correspondence address has since been sorted (Unit 216, 295 New Cross Road, London, SE14 6AS) and added to our website as our address.

Over the last few days we've received a number of quite nasty threats of violence and a tonne of abuse (including calls from withheld numbers to the number I registered with the Electoral Commission). I'm very keen to get our registered address changed to the new one so my home address isn't on the internet as soon as possible (quite frankly I'm worried I will get a brick or worse through the window). If you could get this sorted as soon as possible we would be incredible grateful!

Best wishes,

James Bickerton

---------- Original Message ----------
From: [redacted]
Received: 14/11/2019 12:04
To: Led By Donkeys; Led By Donkeys Ltd.; Oliver Knowles
Subject: Electoral Register information and weekly reporting CCM:0336867

Hi James,

Further to our conversation this morning, here is the requested information relating to the electoral register and the weekly reporting requirements.

Electoral Register

All registered NPC's are entitled to copies of the electoral register. To access the registers it is necessary to submit a written request to each relevant local authority.

Contact details of the local authorities can be found by typing in a local postcode to the box provided here on our website.

Further details on who can access the register and for what reason, can be found here.

Weekly reporting

As you are aware, registered NPC's are required to submit donations reports each week from the dissolution of Parliament up until polling day.

The donations that must be declared in these pre-poll reports are those with a value of over £7,500 that have been **received** in each pre-poll period. Therefore, you must report all donations that have been received even if they have not yet been accepted.

Please note, the £7,500 threshold does not include aggregations. Therefore you are only required to report single donations over this value.

Further details on weekly reporting can be found here and the deadlines for each pre-poll report can be found here.

Kind regards,

[redacted]

[redacted]

The Electoral Commission
020 7271 [redacted]
electoralcommission.org.uk

---------- Original Message ----------
From: Partyreg
Received: 19/11/2019 15:40
To: Led By Donkeys; Led By Donkeys Ltd.; Oliver Knowles
Subject: FW: Led By Donkeys – receipt of notification CCM:0389282

Dear Oliver,

Thank you for your time in taking my call just now.

As discussed on the phone, I have rejected your notification in PEF Online. To amend the details of it, log back into the system and click the “amend rejected application” button.

You will then be able to address the points covered in my email below and in our telephone conversation, and then re-Submit the notification. This includes the following actions:

1. Amend the name of the company to “Led By Donkeys Ltd” under the “Organisation details” tab
2. Add yourself as a relevant participator under the “Relevant Participators” tab
3. Add the details of the company secretary (or similar) under the “Users” tab, and then assign them the role of secretary under the “User roles” tab

In line with point 3 above, it would be helpful if you could please respond to this email explaining how this person fulfils the role of secretary (or similar) for your company and how they therefore are authorised to sign the notification. This person who is the signatory should be the person who has overall administrative affairs of the company.

If you have any further questions then please get in touch.

Yours sincerely,

[redacted]

From: Partyreg
Sent: 15 November 2019 08:57
To: [redacted] <[redacted]>
Subject: Led By Donkeys – receipt of notification

Dear Oliver Knowles,

Thank you for your notification to register as a non-party campaigner, which we received on 13 November 2019. Led By Donkeys is not registered until we confirm this in writing.

We have conducted an initial check of the notification and have identified matters that require your attention. We would be grateful if you could please address the matters raised below as soon as possible, and not later than Monday 18 November 2019.

Matters for consideration

It is your responsibility to determine the details of your notification and to ensure that it complies with the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA).

The following matters were identified on an initial check of your notification. You now have an opportunity to address them before the application is assessed in full.

Should the notification proceed to a full assessment against the PPERA requirements, further matters may be identified. Until a final decision is taken on your notification, we cannot confirm whether or not it will be successful.

Unless these issues are resolved, the notification may be refused.

Relevant participators

A notification to register a third party must specify the names of its relevant participators. For a company, these are the company's directors.

You are listed as a director for the company on companies house, but you have not been listed as a relevant participator in your notification.

Please confirm whether or not you are a company director. If you are, then the notification will need to be amended to reflect this.

Name of the company

You have applied to register as a company. The name of the company on the companies house register is "Led By Donkeys Ltd", whereas the name contained in your notification is simply "Led By Donkeys".

Please could you confirm that the correct name for your company is "Led By Donkeys Ltd"? If so, the notification can be amended accordingly.

Secretary

A notification to register a company as a third party must be signed by the company's secretary or, if the company doesn't have a secretary, the person who acts in a similar capacity for the company.

We note from companies house that your company is not registered with a secretary.

Therefore, could you please confirm that you are the secretary and, if you are not the secretary, how you act in a similar capacity and therefore authorised to sign the notification?

If you are not the correct person to sign the notification, then the notification will need to be re-signed.

Next steps

If you intend to amend your notification please do so as soon as possible and no later than 18 November 2019. **If you would like to make these changes online, please let us know.**

After that date we will review any amendments or additional information you provide to us. The Registration Team will check your notification to make sure that it meets the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA). The Director of Regulation will then take the final decision whether or not to approve your registration.

We aim to process a notification as quickly as possible after receipt of a complete and compliant notification.

You can find guidance in relation to registering a non-party campaigner, as well as the non-party campaigner spending rules for specific elections on our website.

Rules for non-party campaigners (NPCs)
If a non-party campaigner does not register, then it cannot spend more than £20,000 in England and £10,000 in Scotland, Wales and Northern Ireland on regulated campaign activity. The spending limits for registered non-party campaigners are set out in our guidance for non-party campaigners on our website.

A non-party campaigner cannot spend above the relevant threshold until it submits a registration notification to us that contains all of the information required by PPERA, and it should not spend above the threshold until we have confirmed its registration in writing. If you have already exceeded the registration threshold, you should not undertake any more regulated campaign spending until we have confirmed your registration in writing.

You can find the rules on imprints here.

Please note there are strict legal restrictions apply on the use of the electoral register accessed by a registered NPC. It can only be used by registered NPCs for electoral purposes and the control of donations.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

---------- Original Message ----------
From: Mukesh Naker
Received: 07/11/2019 02:43
To: [redacted]
Subject: Guidance required for the GE2019 with respect to - Draft ODV Website hosting

Newsletters, Internet & Social Media

07/11/19

Dear [redacted]
Re Guidance required for the GE2019 with respect to - Draft ODV Website hosting

It would be a great help if you could review this document in how ODV will be conducting the campaign. Please feel free to point out any changes that need to be made to comply with non-political party campaigner. Open to all recommendations.

I will get our studio to start setting it but offline.

This draft is being requested for review from

1. Electoral Commission.
2. Information Commissioners Office for the GDPR & the volunteers handling the data etc.
3. Charity commission regarding the Community organisations doing what I suggest does not break the law.
5. My IT person who is preparing the GDPR requirements internally.

Kind Regards

Mukesh Naker
Operation Dharmic Vote
Promoted by DSP Publishing
Mobile [redacted]

Twitter [redacted]
[redacted]
Facebook - [redacted]Please Join us
Websites - http://www.dsp.today/to-make-the-dharmic-voter-politically-significant-in-local-and-national-elections-to-all-political-parties/

---------- Original Message ----------
From: Partyreg
Received: 22/11/2019 15:26
To: Kate Rodde; Katharine Rodde
Cc: Led By Donkeys; Led By Donkeys Ltd.; Oliver Knowles
Subject: Led By Donkeys – Registration confirmation CCM:0389292

Dear Kate and Oliver,

Registration of Led By Donkeys Ltd.
I write to inform you that we have processed and approved your notification to register **Led By Donkeys Ltd.** as a non-party campaigner which was submitted on 13 November 2019 and considered complete on 20 November 2019. Your registration is in effect from 20 November 2019.

You have been allocated reference [redacted], which should be quoted on all communications and returns sent to us. The reference is a safeguard so that we can be certain that any correspondence, returns etc. received in your NPC's name are genuine. We advise you no to publicise this number.

Non-party campaigner (NPC) contact details
We confirm the following details for your non-party campaigner registration. Please contact us if any of these details are incorrect or change.

The NPC's address, name, the names of the responsible person and secretary, and relevant participators will appear on the register. Other details such as addresses of individuals will not appear on the register.

Your entry on the register is:
http://search.electoralcommission.org.uk/English/Registrations/TP10353
(please allow a day for the entry to appear on the register)

	Post/Home address	Email	Telephone
Campaigner Headquarters	71-75 Shelton Street, London, Greater London, United Kingdom, WC2H 9JQ	[redacted]	[redacted]
Responsible person: Oliver Knowles	-	[redacted]	[redacted]
Secretary: Katharine Rodde	-	[redacted]	[redacted]
Names of relevant participators:	• Ben Stewart • James Sadri • Oliver Knowles • Will Rose		

Guidance

You can find our general guidance for NPCs here and our guidance for the 2019 elections here. If you have any questions about spending or reporting, please contact pef@electoralcommission.org.uk

Enforcement

Failure to comply with the obligations may be a criminal offence which can attract prosecution or civil sanctions, including a fine. You can find our enforcement policy here.

NPC renewal deadline

To remain registered you must submit renewal each year. This must be delivered between one month before and up to three months after, the anniversary of when the original notification was provided to us.

Your renewal deadline is 20 February 2021. You should set a reminder for this deadline if you intend to renew your registration. If your NPC is not renewed, it will be removed from the register. This can be completed either online or by using a TP3 form.

Electoral register

Legal restrictions apply on the use of the electoral register accessed by NPCs. It can only be used for electoral purposes and the control of donations. Breaching the restrictions on the use of the electoral register can result in an unlimited fine in England and Wales or a fine of up to £5,000 in Scotland.

Please contact us if you have any further questions.

Yours sincerely,

[redacted]

From: Kate Rodde [redacted]
Sent: 20 November 2019 16:43
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: FW: Led By Donkeys – receipt of notification CCM:0389282

Hi, Further to my call to [redacted] flagging an apparent system issue I have now managed to resolve the bug so please disregard my cry for help!

Regards
Kate Rodde
on behalf of Led by Donkeys Ltd

IMPORTANT MESSAGE

Thank you for submitting your registration online to the Electoral Commission.

Finish

On Wed, 20 Nov 2019 at 14:54, Led By Donkeys [redacted] wrote:
Hi Kate

Here's the note from the Elec Commission. They are asking us to update three sections which we can now do ourselves.

Note that they say here, the person who signs should have overall administrative control of the company which is a bit different to how it was put on the call. I explained your role and they thought that was fine, so I think if you are happy then please sign. I was clear that we as the four company directors have overall responsibility for the outputs and compliance.

Give me a shout with any questions Kate. Many thanks.

Olly

---------- Forwarded message ---------
From: **Partyreg** <Partyreg@electoralcommission.org.uk>
Date: Tue, 19 Nov 2019 at 15:40
Subject: FW: Led By Donkeys – receipt of notification CCM:0389282
To: [redacted] [redacted]

Dear Oliver,

Thank you for your time in taking my call just now.

As discussed on the phone, I have rejected your notification in PEF Online. To amend the details of it, log back into the system and click the “amend rejected application” button.

You will then be able to address the points covered in my email below and in our telephone conversation, and then re-Submit the notification. This includes the following actions:

1. Amend the name of the company to “Led By Donkeys Ltd” under the “Organisation details” tab

2. Add yourself as a relevant participator under the “Relevant Participators” tab

3. Add the details of the company secretary (or similar) under the “Users” tab, and then assign them the role of secretary under the “User roles” tab

In line with point 3 above, it would be helpful if you could please respond to this email explaining how this person fulfils the role of secretary (or similar) for your company and how they therefore are authorised to sign the notification. This person

who is the signatory should be the person who has overall administrative affairs of the company.

If you have any further questions then please get in touch.

Yours sincerely,

[redacted]

From: Partyreg
Sent: 15 November 2019 08:57
To: [redacted]' <[redacted]>
Subject: Led By Donkeys – receipt of notification

Dear Oliver Knowles,

Thank you for your notification to register as a non-party campaigner, which we received on 13 November 2019. Led By Donkeys is not registered until we confirm this in writing.

We have conducted an initial check of the notification and have identified matters that require your attention. We would be grateful if you could please address the matters raised below as soon as possible, and not later than Monday 18 November 2019.

Matters for consideration
It is your responsibility to determine the details of your notification and to ensure that it complies with the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA).

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Should the notification proceed to a full assessment against the PPERA requirements, further matters may be identified. Until a final decision is taken on your notification, we cannot confirm whether or not it will be successful.

Unless these issues are resolved, the notification may be refused.

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You are listed as a director for the company on companies house, but you have not been listed as a relevant participator in your notification.

Please confirm whether or not you are a company director. If you are, then the notification will need to be amended to reflect this.

Name of the company

You have applied to register as a company. The name of the company on the companies house register is “Led By Donkeys Ltd”, whereas the name contained in your notification is simply “Led By Donkeys”.

Please could you confirm that the correct name for your company is “Led By Donkeys Ltd”? If so, the notification can be amended accordingly.

Secretary

A notification to register a company as a third party must be signed by the company’s secretary or, if the company doesn’t have a secretary, the person who acts in a similar capacity for the company.

We note from companies house that your company is not registered with a secretary.

Therefore, could you please confirm that you are the secretary and, if you are not the secretary, how you act in a similar capacity and therefore authorised to sign the notification?

If you are not the correct person to sign the notification, then the notification will need to be re-signed.

Next steps

If you intend to amend your notification please do so as soon as possible and no later than 18 November 2019. **If you would like to make these changes online, please let us know.**

After that date we will review any amendments or additional information you provide to us. The Registration Team will check your notification to make sure that it meets the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA). The Director of Regulation will then take the final decision whether or not to approve your registration.

We aim to process a notification as quickly as possible after receipt of a complete and compliant notification.

You can find guidance in relation to registering a non-party campaigner, as well as the non-party campaigner spending rules for specific elections on our website.

Rules for non-party campaigners (NPCs)

If a non-party campaigner does not register, then it cannot spend more than £20,000 in England and £10,000 in Scotland, Wales and Northern Ireland on regulated campaign activity. The spending limits for registered non-party campaigners are set out in our guidance for non-party campaigners on our website.

A non-party campaigner cannot spend above the relevant threshold until it submits a registration notification to us that contains all of the information required by PPERA,

and it should not spend above the threshold until we have confirmed its registration in writing. If you have already exceeded the registration threshold, you should not undertake any more regulated campaign spending until we have confirmed your registration in writing.

You can find the rules on imprints here.

Please note there are strict legal restrictions apply on the use of the electoral register accessed by a registered NPC. It can only be used by registered NPCs for electoral purposes and the control of donations.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

---------- Original Message ----------
From: Partyreg
Received: 20/11/2019 16:39
To: Kate Rodde
Cc: Led By Donkeys; Led By Donkeys Ltd.; Oliver Knowles
Subject: Led By Donkeys Ltd. - Submitting notification on PEF Online CCM:0389288

Dear Kate,

I apologise for missing your call earlier this afternoon. I understand that you had encountered difficulties in submitting your registration, though I think that your issue has now been resolved.

I have checked the status of your notification and it appears that you can now submit it.

Please log into the system and click the “Submit application” button under the “Submit” tab (see screen grab below).



Let us know if you have any further questions.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

---------- Original Message ----------
From: Partyreg
Received: 28/11/2019 11:28
To: Mukesh Naker; Operation Dharmic Vote
Cc: Bharat Rana
Subject: Operation Dharmic Vote - Notification Decision CCM:0462764

Dear Mukesh,

Registration of Operation Dharmic Vote
I write to inform you that we have processed and approved your notification to register **Operation Dharmic Vote** as a non-party campaigner which was submitted on 11 November 2019 and considered complete on 25 November 2019. Your registration is in effect from 25 November 2019.

You have been allocated reference [redacted], which should be quoted on all communications and returns sent to us. The reference is a safeguard so that we can be certain that any correspondence, returns etc. received in your NPC's name are genuine. We advise you no to publicise this number.

Non-party campaigner (NPC) contact details
We confirm the following details for your non-party campaigner registration. Please contact us if any of these details are incorrect or change.

The NPC's address, name, the names of the responsible person and secretary, and relevant participators will appear on the register. Other details such as addresses of individuals will not appear on the register.

Your entry on the register is:
http://search.electoralcommission.org.uk/English/Registrations/TP10347
(please allow a day for the entry to appear on the register)

	Post/ Home address	**Email**	**Telephone**
Campaigner Headquarters	143 Cavendish Road Leicester	[redacted]	[redacted]

	Leicestershire LE2 7PJ		
Responsible person: Mukesh Naker	143 Cavendish Road Leicester Leicestershire LE2 7PJ	[redacted]	[redacted]
Secretary: Bharat Rana	[redacted]	[redacted]	[redacted]
Names of relevant participators:	• Mukesh Naker • Hasmukh Patel • Jitu Mistry • Bharat Rana		

Guidance

You can find our general guidance for NPCs here and our guidance for the 2019 elections here. Below we have highlighted some specific guidance. If you have any questions about spending or reporting, please contact pef@electoralcommission.org.uk

General campaign spending

The spending limits for registered NPCs are:

England - £479,550

Scotland - £73,400

Wales - £55,259

Northern Ireland - £37, 550

NPCs must not spend more than £9,750 per constituency. You can find our guidance about focussed constituency spending here.

However, please note that depending on how your spending is attributed, your spending limits may differ to those noted above. Further information on the attribution rules can be found on p12 of our guidance.

Targeted Spending

Targeted Spending is regulated campaign activity that can reasonably be regarded as intended to influence voters to vote for one particular registered party or any of its candidates. You can find our guidance for targeted spending here.

If the party you are campaigning for authorises you to incur an amount of targeted campaign spending, you may spend up to any limit (or 'cap') authorised by that party. However, you must not exceed the general spending limits.

If you are not authorised by the party, you must not spend more than the following limits on targeted spending:
England - £31,980
Scotland - £3,540
Wales - £2,400
Northern Ireland - £1,080

The constituency spending limits also still apply.

Local campaign spending

NPCs can spend up to £700 campaigning for certain candidates. You must be authorised by the candidate to exceed this limit. Any excess must be reported by the candidate and will be count towards their limit. You will also be required to submit a spending return to the local authority detailing spending related to the candidate's campaign.

Although we can provide advice about local campaigning, we do not regulated these rules – Breaches of these rules are dealt with by the police.

Donations

Registered NPCs must only accept donations, with a value of over £500, from certain permissible sources. You can find our guidance about donations here.
Permissible sources are:

- Most UK registered companies
- An individual registered on a UK electoral register, including overseas electors and those leaving bequests.
- UK registered trade union.
- UK registered building society.
- UK registered LLPs that carry on business in the UK.
- UK registered friendly society.
- UK based unincorporated association that carries on business or other activities in the UK.

Registered NPCs cannot accept donations from registered parties.

Reporting

Post-election, NPCs are required to report details of all spending incurred (or used) within the 12 month regulated period and all donations received in line with their campaign activity. The return must be accompanied by invoices for all payments with a value of over £200. You can find more information about this here.

Values for each of the following types of expenditure must be included in the return:

- Notional spending
- Unpaid claims
- Disputed Claims

The return must be submitted within 3 months of the election or within 6 months of the election if total spending is over £250,000. The later must also submit an independent auditors report.

Pre-poll reporting

NPCs must report certain donations to us on a regular basis before the poll. You can find our pre-poll reporting guidance here. You can make the reports via PEF Online or using the TP6 (ii) form.

You must record and report all donations you receive from a single source that add up to over £7,500. Money, goods property or services from a single source over £500 are considered donations.

Below I have set out the reporting periods for this election:

- 6 Nov-12 Nov: deadline 19 Nov.
- 13 Nov – 19 Nov: deadline 26 Nov.
- 20 Nov – 26 Nov: deadline 3 Dec.
- 27 Nov – 3 Dec: deadline 10 Dec.
- 4 Dec – 10 Dec: deadline 17 Dec.
- 11Dec – 12 Dec: deadline 19 Dec.

Enforcement

Failure to comply with the obligations may be a criminal offence which can attract prosecution or civil sanctions, including a fine. You can find our enforcement policy here.

NPC renewal deadline

To remain registered you must submit renewal each year. This must be delivered between one month before and up to three months after, the anniversary of when the original notification was provided to us.

Your renewal deadline is 25 February 2021. You should set a reminder for this deadline if you intend to renew your registration. If your NPC is not renewed, it will be removed from the register. This can be completed either online or by using a TP3 form.

Electoral register

Legal restrictions apply on the use of the electoral register accessed by NPCs. It can only be used for electoral purposes and the control of donations. Breaching the restrictions on the use of the electoral register can result in an unlimited fine in England and Wales or a fine of up to £5,000 in Scotland.

Please contact us if you have any further questions.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Ben Tait
To: [redacted]
Subject: Re: Non-Party Campaigner Notification - Mainstream UK CCM:0336880
Date: 17 November 2019 01:59:23

Dear [redacted],

Thank you for the information. I am aware of the significant obligations the regulations place on the campaign and in receipt of extensive specialist legal advice on an ongoing basis to guide our activities. I will of course be in touch should any queries arise.

Thank you again,
Ben

On Fri, 15 Nov 2019 at 18:03, [redacted] wrote:

> Dear Ben,
>
> I am writing to you as I understand that Mainstream has been engaging in campaign activity.
>
> The attached guidance document will help to determine whether your activity is regulated and if so, how to comply with electoral regulations.
>
> If you have any queries arising from this guidance, please let me know.
>
> Kind regards,
>
> [redacted]
>
> [redacted]
>
> [redacted]
>
> **The Electoral Commission**
>
> 020 7271 [redacted]
>
> electoralcommission.org.uk
>
> **From:** Ben Tait <[redacted]>
> **Sent:** 07 November 2019 00:25
> **To:** Partyreg <Partyreg@electoralcommission.org.uk>
> **Subject:** Non-Party Campaigner Notification - Mainstream UK
>
> Dear Sir/Madam,
>
> Please see the attached notification to register as a non-party campaign for MTCAE Ltd, the legal entity behind *Mainstream - The Campaign Against Extremism (www.mainstreamuk.org)*. I trust that I have completed it satisfactorily, but please let me know if you have any further questions.

I am aware of the significant obligations that fall on us in this context and have taken extensive and ongoing legal advice and made resultant appropriate arrangements for the governance of this company and campaign to the highest standards.

Sincerely,

Ben Tait

Ben Tait

Director

Mainstream - The Campaign Against Extremism

MTCAE Ltd

[redacted]

[redacted]

---------- Original Message ----------
From: [redacted]
Received: 12/12/2019 09:27
To: [redacted]
Subject: RE: Advice on Led By Donkeys compliance

Dear [redacted],

We have some guidance about how the purpose test applies to activities that took place before the election was announced – see here.

As mentioned in my last email, the relevant date for assessing the purpose test is when the election is announced, rather than when Parliament is dissolved (although you could not be regulated under the local campaign rules in RPA until after Parliament was dissolved).

By 29 October the House of Commons had voted for an election, so we consider it was definitely possible to be campaigning in the election by 30 October. However, on the 3 October there was no election likely, so it would not be reasonable to regard Led By Donkeys as intending to influence voters in the election.

Similarly, I noticed on your list of campaign actions that you were considering apportioning some of the 'Stop Boris' Angel of the North costs to its constituency, which would assume it was regulated. Our view is that 4 September was a long time before the election was called, and therefore the action is reasonably regarded as being about what was going on in Parliament and government, rather than being about a possible election. The costs are therefore not regulated.

I hope these examples are helpful for you looking at your other spending before the UK Parliamentary general election was announced.

I've not found the van examples, but in general, spending before the election was announced will only meet the purpose test if either:

a) it met the purpose test in another election in the regulated period – for example Led By Donkeys' campaign against the Brexit Party in the European Parliamentary elections, or
b) it somehow made reference to the coming election before it was announced.

We do not consider that simply displaying an advert in a Minister's constituency is enough to be making reference to an election which has not yet been called.

Any further questions please get in touch,

[redacted]

From: [redacted]
Sent: 11 December 2019 08:43

To: 'Compliance LBD' <[redacted]>
Subject: RE: Advice on Led By Donkeys compliance

Dear [redacted],

We will have a look at these – if you could send a couple of links that would be helpful.

Because the purpose test is about the reasonably regarded intention of the campaigner, the actual date of Dissolution is not necessarily the important difference – although it can be relevant, especially to local campaigning, since there were no 'official' candidates before that date. The important thing is whether the campaigner knew there was going to be an election, and therefore whether it could be reasonable to say that they intended to influence voters in it.

We will have a look at the examples on this basis.

Thanks,

[redacted]

From: Compliance LBD <[redacted]>
Sent: 10 December 2019 20:11
To: [redacted] <[redacted]>
Subject: Re: Advice on Led By Donkeys compliance

Dear [redacted]

This advice was extremely helpful thank you. I wanted to just point out that both the Boris Johnson billboards were placed before the short campaign started (3rd and 30th October) , so we were thinking of putting them in as regulated spend to take a cautious approach. However, the intention, and I believe what a reasonable person would consider to be the intention of the billboards would not relate to an election. I am therefore questioning the necessity of reporting them as regulated spend.

Equally, there are some ad vans which went to key Ministers' constituencies to hold them to account for remarks they had previously made. We were going to include that in regulated spend because it features the MPs in their own constituencies, but the subject matter is completely focused on Brexit.

It would be great to get your view on this. I can send you the links if helpful.

very best wishes

[redacted]

On Tue, 10 Dec 2019 at 12:27, [redacted] <[redacted]> wrote:

Hi [redacted],

Thanks for this, and for your explanations on the phone.

Attribution of spending
I outlined our position in our second phone call, but I said I would give the legal details in an email to follow.

This advice is based on our conversations and what we have seen of your campaigning so far.

We assume that the costs associated with a particular action include the original costs of the projection/billboard and the subsequent promotion via social media. This is because the two are closely linked, since the main point is the wide social media reach. You confirmed this view of your campaigning when we met at our office.

Apportionment between local and general spending
These costs should then be assessed as to whether they are local campaigning for or against a particular candidate (under s75 RPA) or general campaigning for or against a party or category of candidates (under s85 PPERA). In most cases it will be one or the other rather than split between the two. If an issues-based campaign is unified across the different constituencies – for example it carries the same messaging, or you use the same campaign material – then we will usually treat it as a single campaign under the general rules.

All of the Led By Donkeys material that we have seen so far has been general material. This includes the billboard of Trump/Johnson in Johnson's constituency, and the billboard with Johnson's quote about Portsmouth, in Portsmouth.

Attribution of general spending to constituencies under Sch10 PPERA
All of the Led By Donkeys regulated material that we have seen so far has also been UK-wide general material, including those two billboards. This is even though the material is likely to have a bigger effect in Uxbridge/Portsmouth/wherever the original item is than elsewhere. This is because the messages are general ones at the level of party and issue and because it is integral to the campaign that they be spread via social media, they certainly have a "significant" effect elsewhere in the UK. Therefore, the spending must be attributed equally to all 650 constituencies in the UK (Sch10 part I para 2A), and to each part of the UK in proportion to the number of constituencies (Sch10 part I para 2).

As we spoke about on the phone, there might be further specific targeting of certain target seats (you said around 100) with social media advertising. Assuming these advertising costs would have no significant effect outside of those 100 constituencies, they must be attributed solely to those 100 constituencies.

If many of these 100 constituencies are in England, your limit in England will be reached earlier, meaning that your 'UK-wide' limit will in effect be lower than the approximately £585k you were working to originally.

I have answered your further questions in the email below.

Do get back in touch if you have any further questions.

Kind regards,

[redacted]

From: Compliance LBD <[redacted]>
Sent: 09 December 2019 11:36
To: [redacted] <[redacted]>
Subject: Re: Advice on Led By Donkeys compliance

dear [redacted]

It was great to talk last week.

You helpfully set out that according to the Electoral Commission, you consider that expenditure on national interventions should be classified as either national or local under PPERA, and that the interventions I shared with you, and all of the Led By Donkeys work, qualifies as national spend, therefore we can divide those costs between 650 and apportion them evenly across the country. You also said that you would check in with your colleagues and send back a written note - we would really appreciate that, though we understand it is a busy time.

Some questions we would love answers:

- confirmation that our national intervention costs can all be divided by 650 in the short campaign (as sent to you in the last doc)

Much of your spending will be divided by 650, including in particular the original costs of the billboards/beach art/etc that we have seen – see long answer on attribution above.

- confirmation that where we have a group of constituencies we are targeting, as long as they make sense in terms of the national campaign (in our case marginal seats that need to be won to prevent a conservative majority), spending to those seats can also be divided between 650 under PPERA because those seats are a clear part of the national campaign strategy

Many of your costs will be divided by 650, but where there is spending that has no significant effect outside of a particular area, such as social media adverts targeted at a certain number of constituencies, this must be attributed only to the constituencies where it does have a significant effect – see long answer on attribution above.

- confirmation that although the regulated period finishes at the end of the day on Wednesday 11 December, we can spend money on neutral 'Get out the vote' facebook ads on Thursday with non-regulated spend. I am asking because we discussed this point when we came in to see you and Momentum was mentioned as an organisation that is well known for having links with Labour and therefore Momentum-sponsored GOTV ads would never be considered neutral. My question therefore is about how that judgment applies to Led By Donkeys? I

would argue Led By Donkeys can send neutral GOTV messages to the broad British public, but I would like your advice.

The regulated period finishes on Thursday 12 December, and as I said on the phone there is no prohibition on campaigning on polling day. There is a convention among political parties not to campaign, and there is a ban on publishing the results of any polls while polling stations are open.

If your 'Get the vote out' campaign does not encourage voters to vote in a particular way, it is unlikely to be regulated. You said that your ad would likely simply be the word 'VOTE' with Led By Donkeys branding.

Lastly, I also wanted to double check on some fundamental understandings about the overall spending limits. You and your colleagues rightly cautioned us about becoming too fixated on the overall UK spending limit, saying that only applies if all constituencies are treated in an even way (presumably not completely evenly though as we have constituency limits!). My understanding is that we **can** spend up to the UK spending limit as long as we don't surpass teh constituency limits and the England, Scotland, Wales and NI spending limits along the way.

As mentioned on the phone, the 'UK-wide spending limit' is a construct from the spending limits in the four parts of the UK, and the attribution rules. The figure of £584,817.07 in the guidance is the amount that would be spent on *purely* UK-wide spending by the time you hit the spending limit in England.

As your campaign is likely to combine UK-wide spending with more focused spending aimed primarily at English constituencies, you will reach the England limit when you have spent *less* than £584,817.07 overall.

In order not to go over any limit, you should especially keep track of each constituency limit and the England limit.

Some of this would be good to talk through.

very best wishes
[redacted]

On Thu, 5 Dec 2019 at 13:48, Compliance LBD <[redacted]> wrote:
Hello [redacted]

Thanks for your time this morning - and for your call just now - this was written prior to that but I'll leave it so you can respond!

probably particularly helpful if you look at the material in
Portsmouth (current twitter feed - I will get you a summary later this afternoon)
Uxbridge retweet
Long campaign spend in particular seats

As promised attached is a review of all the content between the end of May and early November.

The ones we were thinking of apportioning between local and national include (but are not limited to):
- 25% of the cost of the Angel of the North tweet as national spend (because a quarter of the views were of the 'stop boris' message)
- we are thinking of how to apportion spend on e.g. the advans that went into Gove, Raab, Johnson, Javid, Rudd's constituencies. We were thinking that a reasonable person could take that as being a message against those candidates. Maybe an 80/20 split under PPERA

Also for the SHORT campaign which we discussed in passing, there are two categories of spend (these pieces of content are not in the attached document but are in the last week or so of the Led By Donkeys twitter feed)

- e.g. when we do a big visual in Sheffield as we did with a call to get the Tories out and register to vote, can we divide that simply by 650 even though some people in Sheffield saw it in 'real life'? Same goes for London projections for what passersby might see.

- the other kind is how to apportion eg Boris Johnson Billboard in Portsmouth where the text mentions Portsmouth - I would argue a bigger lean to local over national split than usual because of the local relevance.

- lastly the question raised about whether the full cost of a billboard is incurred when an image of eg Johnson in Uxbridge is retweeted during the short campaign (BUT the billboard appeared in Uxbridge during the long campaign)

If all the above can be divided into 650 under PPERA that would be great.

Thanks [redacted] and don't hesitate to call me with any questions on [redacted]

very best wishes
[redacted]

On Thu, 5 Dec 2019 at 10:20, Sam Nicholson <[redacted]> wrote:
Sorry again!

[redacted]

From: Compliance LBD <[redacted]>
Sent: 05 December 2019 09:19
To: [redacted] <[redacted]>
Subject: Re: Advice on Led By Donkeys compliance

there's a digit missing! thanks

On Thu, 5 Dec 2019 at 10:17, [redacted] <[redacted]> wrote:
Sorry – [redacted]

[redacted]

From: Compliance LBD <[redacted]>
Sent: 05 December 2019 09:17
To: [redacted] <[redacted]>
Subject: Re: Advice on Led By Donkeys compliance

hi [redacted]
could you remind me of your number please?
thanks
[redacted]

On Wed, 4 Dec 2019 at 16:18, Compliance LBD <[redacted]> wrote:
That's brilliant thanks [redacted]! Yes I'll give you a call

all best
[redacted]

On Wed, 4 Dec 2019 at 15:41, [redacted] <[redacted]> wrote:
Hi [redacted],

If 9/9.15 is better for you, then that's fine I'll be here.

Speak to you then – will you call me?

[redacted]

From: Compliance LBD <[redacted]>
Sent: 04 December 2019 14:07
To: [redacted] <[redacted]>
Subject: Re: Advice on Led By Donkeys compliance

Hi [redacted]

Great - would you be able to do 11am? We have our daily check in at 10am so that would be better.

Otherwise if you're an early starter in the office it would be great to have a call at 9/9.15?

thanks so much
[redacted]

On Wed, 4 Dec 2019 at 14:06, [redacted] <[redacted]> wrote:

Hi [redacted] and all,

I'm not available on Friday, but I am free for most of tomorrow. Shall we say 10am? But I am quite free so please suggest another time if it's more convenient.

Thanks,

[redacted]

From: Compliance LBD <[redacted]>
Sent: 04 December 2019 13:01
To: [redacted] <[redacted]>
Subject: Advice on Led By Donkeys compliance

Dear [redacted]

I hope you are well. I'm sure it is a busy time.
Could you let me know if there is a time between tomorrow and Friday that would suit for a call to set out how we are measuring our compliance and make sure we have understood everything especially regarding PPERA and the regional and constituency limits?

Thanks so much
[redacted] on behalf of Led By Donkeys
[redacted]

---------- Original Message ----------
From: [redacted]
Received: 10/12/2019 15:09
To: [redacted]
Subject: RE: Advice on Led By Donkeys compliance

Hi [redacted],

Thanks for this and the clarification on the phone.

From what you have said, this is unlikely to constitute joint campaigning.

Their data is open source and available to anyone to use.

What you are doing sounds similar to what we say in our guidance about having discussions and endorsing someone else's campaign:

"You are unlikely to be incurring joint spending if you:[…]

- *have informal discussions with another campaigner, or keep each other informed, in a way that does not involve decision-making or coordinating your plans*

- *endorse another campaign without having any further involvement – for example if you:[…]*

    - *add your branding to another campaign*
    - *publicise your support for another campaign"*

I hope this is helpful. Do keep getting in touch if you have further questions.

Kind regards,

[redacted]

From: Compliance LBD <[redacted]>
Sent: 10 December 2019 12:52
To: [redacted] <[redacted]>
Subject: Re: Advice on Led By Donkeys compliance

Thank you [redacted] this is super helpful!

We chatted on the phone today, and I said that we have integrated the information from www.tactical.vote website to essentially give people guidance on tactical voting. We want to acknowledge their work (because we haven't worked with them on this).

We were going to say 'thanks to our friends at tactical.vote for pulling together this publicly available info'

Is that ok? We have discussed using their website with them and they have explained how they have gone about it for our understanding, but in no way has this been joint working.

very best
[redacted]

On Tue, 10 Dec 2019 at 12:27, [redacted] <[redacted]> wrote:
Hi [redacted],

Thanks for this, and for your explanations on the phone.

Attribution of spending
I outlined our position in our second phone call, but I said I would give the legal details in an email to follow.

This advice is based on our conversations and what we have seen of your campaigning so far.

We assume that the costs associated with a particular action include the original costs of the projection/billboard and the subsequent promotion via social media. This is because the two are closely linked, since the main point is the wide social media reach. You confirmed this view of your campaigning when we met at our office.

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If many of these 100 constituencies are in England, your limit in England will be reached earlier, meaning that your 'UK-wide' limit will in effect be lower than the approximately £585k you were working to originally.

I have answered your further questions in the email below.

Do get back in touch if you have any further questions.

Kind regards,

[redacted]

From: Compliance LBD <[redacted]>
Sent: 09 December 2019 11:36
To: [redacted] <[redacted]>
Subject: Re: Advice on Led By Donkeys compliance

dear [redacted]

It was great to talk last week.

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Some of this would be good to talk through.

very best wishes
[redacted]

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If all the above can be divided into 650 under PPERA that would be great.

Thanks [redacted] and don't hesitate to call me with any questions on [redacted]

very best wishes
[redacted]

On Thu, 5 Dec 2019 at 10:20, [redacted] <[redacted]> wrote:
Sorry again!

[redacted]

From: Compliance LBD <[redacted]>
Sent: 05 December 2019 09:19

To: [redacted] <[redacted]>
Subject: Re: Advice on Led By Donkeys compliance

there's a digit missing! thanks

On Thu, 5 Dec 2019 at 10:17, [redacted] <[redacted]> wrote:
Sorry – [redacted]

[redacted]

From: Compliance LBD <[redacted]>
Sent: 05 December 2019 09:17
To: [redacted] <[redacted]>
Subject: Re: Advice on Led By Donkeys compliance

hi [redacted]
could you remind me of your number please?
thanks
[redacted]

On Wed, 4 Dec 2019 at 16:18, Compliance LBD <[redacted]> wrote:
That's brilliant thanks [redacted]! Yes I'll give you a call

all best
[redacted]

On Wed, 4 Dec 2019 at 15:41, [redacted] <[redacted]> wrote:
Hi [redacted],

If 9/9.15 is better for you, then that's fine I'll be here.

Speak to you then – will you call me?

[redacted]

From: Compliance LBD <[redacted]>
Sent: 04 December 2019 14:07
To: [redacted] <[redacted]>
Subject: Re: Advice on Led By Donkeys compliance

Hi [redacted]

Great - would you be able to do 11am? We have our daily check in at 10am so that would be better.

Otherwise if you're an early starter in the office it would be great to have a call at 9/9.15?

thanks so much
[redacted]

On Wed, 4 Dec 2019 at 14:06, [redacted] <[redacted]> wrote:
Hi [redacted] and all,

I'm not available on Friday, but I am free for most of tomorrow. Shall we say 10am? But I am quite free so please suggest another time if it's more convenient.

Thanks,

[redacted]

From: Compliance LBD <[redacted]>
Sent: 04 December 2019 13:01
To: [redacted] <[redacted]>
Subject: Advice on Led By Donkeys compliance

Dear [redacted]

I hope you are well. I'm sure it is a busy time.
Could you let me know if there is a time between tomorrow and Friday that would suit for a call to set out how we are measuring our compliance and make sure we have understood everything especially regarding PPERA and the regional and constituency limits?

Thanks so much
[redacted] on behalf of Led By Donkeys
[redacted]

---------- Original Message ----------
From: James Bickerton
Received: 03/12/2019 20:05
To: [redacted] Partyreg
Subject: Re: Campaign against corbynism - Confirmation of receipt CCM:0462780

Dear [redacted],

Thanks a lot for getting in touch. In addition to acting as Director of the CAC I take care of all admin (including legal considerations & financial matters) for the group. As such I believe it's fair to say I act in a capacity similar to a secretary. I hope this makes sense and please let me know if you have any more questions (we're keen to get this sorted as soon as possible).

Best wishes,

James Bickerton

From: Partyreg
Sent: 03 December 2019 17:01
To: [redacted]
Subject: Campaign against corbynism - Confirmation of receipt CCM:0462780

Dear James,

Thank you for your notification to register as a non-party campaigner, which we received on 02 December 2019. Campaign Against Corbynism is not registered until we confirm this in writing.

Secretary

Under the Political Parties, Elections and Referendums Act 2000 (PPERA), it is the secretary of an unincorporated association (or person who acts in a similar capacity) who must sign and submit the notification. Could you elaborate on your role in the organisation and why you are suitable to sign and submit the notification to the Commission?

If the notification is not signed by the secretary it must be signed by a person who acts in a similar capacity to a secretary in relation to the company.

Please provide a response no later than 12pm 04 December 2019.

Should you require further information, please do not hesitate to contact me.

Yours sincerely,

[redacted]

[redacted]

The Electoral Commission

electoralcommission.org.uk

---------- Original Message ----------
From: Partyreg
Received: 22/11/2019 14:10
To: Campaign Against Corbynism
Subject: RE: Campaign Against Corbynism - Receipt of notification CCM:0389264

Dear James,

The law requires that a notification to register an unincorporated association as a non-party campaigner must specify the address of the association's main office in the UK.

If the association does not have an office, I would advise that a PO Box would be sufficient if that is an address to which the association can receive correspondence.

We may need to consider the matter fully upon receipt of a notification as part of our assessment process.

Yours sincerely,

[redacted]

From: Campaign Against Corbynism <[redacted]>
Sent: 20 November 2019 13:54
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Campaign Against Corbynism - Receipt of notification CCM:0389264

Dear [redacted],

We're about to resubmit out Electoral Commission application over the next day or so.

Just one question. We are required to provide an address which I understand will be made public. Can we use our mailbox for this or does it have to be one of the physical addresses of one of our members (we don't have an office)? We've already had threats of violence so I'm a little reluctant to use the latter unless it absolutely can't be avoided.

Best wishes,

James Bickerton

On Fri, Nov 15, 2019 at 11:02 AM Partyreg <Partyreg@electoralcommission.org.uk> wrote:
Dear James,

We have not received a revised notification following my message of last week. We will therefore consider the matter of your registration closed unless you decide to resubmit.

Unless you are registered then you must not spend over £10,000 in Scotland, Wales or Northern Ireland or over £20,000 in England on regulated campaign activity during the regulated period for the general election.

Please get in touch if you have any further questions about registering or the financial reporting rules for non-party campaigners.

Yours sincerely,

[redacted]

From: Partyreg
Sent: 08 November 2019 17:15
To: 'Campaign Against Corbynism' <[redacted]>
Subject: RE: Campaign Against Corbynism - Receipt of notification CCM:0389264

Dear James,

The association must provide the address of its main office in the UK – should the notification be processed then this will be made publicly available on the register.

I have also "rejected" your notification in our system so that you can make amends to it before resubmitting. After you have logged in, just click "Amend rejected application" to continue.

Yours sincerely,

[redacted]

From: Campaign Against Corbynism <[redacted]>
Sent: 08 November 2019 14:04
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Campaign Against Corbynism - Receipt of notification CCM:0389264

Dear [redacted],

Thanks a lot for the clarification - that won't be a problem.

Just one final question before I resubmit the application - will the address I gave as the organisations address be made public? At the moment its my home address but if it's going to be publicly available I might need to change that for security reasons (as I'm sure you can imagine we get a fair bit of blowback)!

Best wishes,

James

On Thu, Nov 7, 2019 at 5:21 PM Partyreg <Partyreg@electoralcommission.org.uk> wrote:
Dear James,

The names of the association's relevant participators will be included in the public register should the group be registered – this is required under PPERA, and helps to ensure that there is transparency in terms of who is spending money campaigning at

elections in the UK. You are not required to provide their home addresses with the notification.

If you have any further questions then please get in touch.

Yours sincerely,

[redacted]

From: Campaign Against Corbynism <[redacted]>
Sent: 07 November 2019 09:12
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Campaign Against Corbynism - Receipt of notification CCM:0389264

Dear [redacted],

Thanks a lot for this and for speaking to me earlier - really appreciate it!

Sorry to be a pain but I do have one more question. Will the names of our organisations "association relevant participants" that I provide be made publicly available? Because of the nature of what we do we've had some threats before and some of our team are very wary about their names being published. I can make it work either way but would be useful to know exactly how it works before I speak to people!

Best wishes,

James

On Tue, Nov 5, 2019 at 6:23 PM Partyreg <Partyreg@electoralcommission.org.uk> wrote:
Dear James,

Following our telephone conversation we've had just now, I am writing to provide further guidance on the information that an unincorporated association must provide to us, and what information is contained on our public register.

Firstly, as I explained on the phone, only certain types of individual or organisation may register with us as non-party campaigners. These are:

- an individual registered on a UK electoral register or resident in the UK
- a UK registered political party (including 'minor' parties)
- a UK registered company which is incorporated in the EU and carries on business in the UK
- a UK registered trade union
- a UK registered building society

- a UK registered Limited Liability partnership which carries on business in the UK
- a UK registered friendly, industrial or provident society
- a body incorporated by Royal Charter
- a UK charitable incorporated organisation
- a Scottish partnership which carries on business in the UK
- **a UK based unincorporated association of two or more persons which does not fall within any of the preceding categories but which carries on business or other activities wholly or mainly in the United Kingdom and whose main office is there**

You should not register as an individual campaigner if campaign expenditure is being incurred by the group Campaign Against Corbynism and not by you as an individual.

The details an unincorporated association must provide to us are (information you have already provided is italicised):

- **the name of the association – *Campaign Against Cobynism***
- **the address of its main office in the UK -** [redacted]
- **the names of the association's relevant participators (in line with the definition I have provided previously) – *to be provided***
- **the name of the person who will be responsible for the association's compliance with the Political Parties, Elections and Referendums Act 2000 (PPERA) – *James Bickerton***

Providing that we are satisfied that the notification contains all the information required under PPERA, then all of the details outlined above will be published on our public register.

You do not need to provide home addresses for either the responsible person or any of the relevant participators.

To progress the notification please confirm that you do not fall within any of the other categories outlined above. If you are an unincorporated association then please let us know the names of your association's relevant participators.

If you do not provide this information then you may not be registered, and may not spend above the threshold outlined in my previous email.

It would also be helpful if you could outline what campaigning you either have conducted, or intend to conduct, for which you have incurred (or will incur) expenditure.

If you have any further questions then please get in touch.

Yours sincerely,

[redacted]

From: Campaign Against Corbynism <[redacted]>
Sent: 05 November 2019 09:34
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Campaign Against Corbynism - Receipt of notification

Dear [redacted],

Thanks a lot for getting back to me. Is there a way I can register so I'm the only person whose details you need? I may have made a mistake by trying to register as an "unincorporated association" (I was a little confused over which box to tick). If possible I'd love to discuss it over the phone with you or one of your team. My number is [redacted] or I can call you?

Best wishes,

James Bickerton

On Mon, Nov 4, 2019 at 3:10 PM Partyreg <Partyreg@electoralcommission.org.uk> wrote:
Dear James Bickerton,

Thank you for your notification to register as a non-party campaigner, which we received on 4 November 2019. Campaign Against Corbynism is not registered until we confirm this in writing.

We have conducted an initial check of the notification and have identified matters that require your attention. We will put your notification on hold until 6 November 2019 so that you can address the matters raised below.

Matters for consideration
It is your responsibility to determine the details of your notification and to ensure that it complies with the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA).

The following matters were identified on an initial check of your notification. You now have an opportunity to address them before the application is assessed in full.

Should the notification proceed to a full assessment against the PPERA requirements, further matters may be identified. Until a final decision is taken on your notification, we cannot confirm whether or not it will be successful.

Relevant participators

Your notification indicates that you are registering as an unincorporated association.

An unincorporated association is defined under PPERA as having two or more members. However, only you are listed as a relevant participator for the association.

For your information, where an unincorporated association submits a notification to register as a non-party campaigner, it must provide certain details. This includes details of its relevant participators.

Where the association has more than 15 members and has officers or a governing body, the relevant participators are those officers or the members of that governing body.

Where the association has 15 or fewer members, the relevant participators are its members.

Please confirm, with reference to the points above, who are the relevant participators of Campaign Against Corbynism?

Unless this information is provided then we may refuse your notification.

Next steps

If you intend to amend your notification please do so as soon as possible and no later than 6 November 2019.

After that date we will review any amendments or additional information you provide to us. The Registration Team will check your notification to make sure that it meets the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA). The Director of Regulation will then take the final decision whether or not to approve your registration.

We aim to process a notification as quickly as possible after receipt of a complete and compliant notification.

You can find guidance in relation to registering a non-party campaigner, as well as the non-party campaigner spending rules for specific elections on our website.

Rules for non-party campaigners (NPCs)

If a non-party campaigner does not register, then it cannot spend more than £20,000 in England and £10,000 in Scotland, Wales and Northern Ireland on regulated campaign activity. The spending limits for registered non-party campaigners are set out in our guidance for non-party campaigners on our website.

A non-party campaigner cannot spend above the relevant threshold until it submits a registration notification to us that contains all of the information required by PPERA, and it should not spend above the threshold until we have confirmed its registration in writing. If you have already exceeded the registration threshold, you should not

undertake any more regulated campaign spending until we have confirmed your registration in writing.

You can find the rules on imprints here.

Please note there are strict legal restrictions apply on the use of the electoral register accessed by a registered NPC. It can only be used by registered NPCs for electoral purposes and the control of donations.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

---------- Original Message ----------
From: Partyreg
Received: 14/11/2019 13:22
To: Alex Crowley
Subject: RE: Fair Tax Campaign Ltd - registration CCM:0288605

Hi Alex,

I have selected this option for you. Please login and complete the amendments and declaration.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Alex Crowley <[redacted]>
Sent: 13 November 2019 17:12
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Fair Tax Campaign Ltd - registration CCM:0288605

Thank you - but I can't see where these options are when I log in. This is the screen I get. Am I looking in the right place?

On Wed, 13 Nov 2019 at 15:10, Partyreg <Partyreg@electoralcommission.org.uk> wrote:
Hi Alex,

To amend your details you must selection the option ‘Amend rejected application’. Once you have done this the application should be editable for you.

[redacted]
[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Alex Crowley <[redacted]>
Sent: 13 November 2019 14:59
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Fair Tax Campaign Ltd - registration CCM:0288605

Hi - sorry to chase but can you advise how I can make the changes in the portal? I'm keen to get the registration sorted so there can be no doubt that our campaign is operating in accordance with the law.

Thanks
Alex

On Tue, 12 Nov 2019 at 10:24, Alex Crowley <[redacted]> wrote:
Hi,

The 'view details' button doesn't seem to be available when I log in:

Is there something that needs to be done at your end to enable it?

Thanks
Alex

On Mon, 11 Nov 2019 at 18:00, Partyreg <Partyreg@electoralcommission.org.uk> wrote:
Hi Alex,

When you log into the account, under ‘View details’ you should see a button at the top right to ‘Amend rejected application’.

Once you select this option you will be able to make the changes.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Alex Crowley <[redacted]>
Sent: 11 November 2019 17:51
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Fair Tax Campaign Ltd - registration CCM:0288605

Hi,

I have just attempted to do so, but it now won't let me change anything under the 'relevant participators' section. Can you advise how I can do this?

Thanks
Alex

On Mon, 11 Nov 2019 at 17:44, Partyreg <Partyreg@electoralcommission.org.uk> wrote:
Dear Alex,

Although you are the sole director of the company, you **must** list this in the notification under the relevant participators section. If you do not set out all of the relevant participators we will not be able to accept the notification.

Similarly to the requirements previously set out to you, this is specified under section 88.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Alex Crowley <[redacted]>
Sent: 11 November 2019 17:38
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Fair Tax Campaign Ltd - registration CCM:0288605

Hi,

I am the only company director, therefore in the portal I have selected no further changes to the application.

Thanks
Alex

On Mon, 11 Nov 2019 at 17:10, Partyreg <Partyreg@electoralcommission.org.uk> wrote:
Dear Alex,

I note in the application you have submitted that you have not added any **relevant participators**. For a company this must list all of the company directors. An NPC cannot be registered unless it has listed all of its relevant participators.

I have 'rejected' your application PEF Online so that you can update your notification to include the names of any company directors. Once you have updated your notification you will need to authorise it again as you did when you originally submitted the notification.

Kind regards,

[redacted]

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Partyreg
Sent: 08 November 2019 14:24
To: 'Alex Crowley' <[redacted]>
Subject: RE: Fair Tax Campaign Ltd - registration CCM:0288605

Dear Alex,

Thank you for providing this information, we will now proceed with your notification.

In relation to the questions you have asked:

1. Only a registered campaigner can spend over the registration thresholds on regulated activity. To spend over the threshold without registering would be an offence under PPERA and we would consider it under our enforcement policy.

2. Any donations received after your notification was submitted are subject to the permissibility and reporting requirements as set out in our guidance. It is a matter for your campaign to ensure donations are from permissible sources.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Alex Crowley <[redacted]>
Sent: 08 November 2019 14:08
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Fair Tax Campaign Ltd - registration CCM:0288605

Dear [redacted],

The attached receipts from the campaign's activity on Facebook will show the company is active and carrying on business in the UK.

I have also attached correspondence from HMRC showing the companies UTR, which thus meets their legal requirement for being active in the UK.

Can I please clarify two further things:

1. If the EC refuses to register this campaign (which operates under Fair Tax Campaign Ltd as the legal entity), then can I take it that the company may spend as much as it likes and be under no obligation to report any donations or spending?

2. Until we are formally registered with the EC, how are we to check the permissibility of donors?

Many thanks
Alex

On Wed, 6 Nov 2019 at 12:24, Partyreg <Partyreg@electoralcommission.org.uk> wrote:
Dear Alex,

Thank you for your email.

One of the requirements of section 88 of the Political Parties Elections and Referendums Act 2000 (PPERA) for non-party campaigner registration is that any company applying to register with us must conform with all of the requirements of a permissible donor under section 54. One of the requirements for a company under section 54 (2) is that it must be carrying on business in the United Kingdom.

We cannot accept a notification from a company if we are not satisfied that the notification meets all of the statutory requirements. I have therefore ask you to confirm that your company is carrying on business as we have not been able to ascertain this through our own research. Simply being on the companies house register is not sufficient to meet this requirement.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Alex Crowley <[redacted]>
Sent: 06 November 2019 10:49
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Fair Tax Campaign Ltd - registration CCM:0288605

Dear [redacted],

Thank you for your email. Sorry for not replying sooner, I have been busy trying to get the campaign underway.

I am confused by your request. As I understand it I have a company and that company is engaging in campaigning as covered by the law. The company will spend over £20,000 and as such the law requires the company to register with the Electoral Commission. This I have attempted to do.

The company is the legal entity responsible for a campaign that has only begun activity this week. Thus, we cannot provide the information you ask for now. We haven't yet got a bank account, for example.

I did not seek to register as an individual because that's not how the campaign is structured. Therefore it would be knowingly misleading to do so.

My understanding of the law is the Commission is obliged to keep a register of campaigners that seek to register, and I'm not sure why you need more than confirmation the company exists which it does (No.12254976) and my confirmation that as its director the company is campaigning and will spend an amount that requires registration.

As you will appreciate I'm keen to register and comply with the law because an election is already underway. I hope therefore the Commission will just check the Company exists, and register me as I think I have given you all that is required.

Many thanks,
Alex

On Tue, 5 Nov 2019 at 11:38, Partyreg <Partyreg@electoralcommission.org.uk> wrote:
Hi Alex,

I have not received a response from you in relation to this matter. Please provide any further information by midday 8 November. We will proceed with the assessment of your notification on this date.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Partyreg
Sent: 30 October 2019 18:15
To: 'Alex Crowley' <[redacted]>
Subject: RE: Fair Tax Campaign Ltd - registration CCM:0288605

Hi Alex,

If this is something that you can provide, we will consider whether this meets the requirements for carrying out business. I would advise you to provide as much evidence of carrying on business as possible.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Alex Crowley <[redacted]>
Sent: 30 October 2019 18:13
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Fair Tax Campaign Ltd - registration CCM:0288605

Would bank statements showing activity be sufficient?

Sent from my iPhone

On 30 Oct 2019, at 17:59, Partyreg <Partyreg@electoralcommission.org.uk> wrote:

Hi Alex,

To register a company as a non-party campaigner it must be carrying out business. Your company will not be able to register with us until we are satisfied that it is carrying out business.

It may be the case that you need to amend your application to be registered as an individual. For an individual to be registered as a non-party campaigner they must be on the UK electoral register and have an address in the UK.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Alex Crowley <[redacted]>
Sent: 30 October 2019 17:47
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Fair Tax Campaign Ltd - registration CCM:0288605

Hi,

This is a company I have recently set up for the purpose of administrating a campaign that, as yet, has not undertaken any campaigning activity pending confirmation of registration.

Therefore, it has yet to carry out any business as it is brand new.

I am a UK registered voter and the company has been set up in the UK, which I believe meets the basic requirements for registration.

I recently worked in Government and was cleared to SC level, a fact you can check with the Cabinet Office.

Please let me know if you need any other information and I will endeavour to provide it.

Many thanks
Alex

On Wed, 30 Oct 2019 at 17:39, Partyreg <Partyreg@electoralcommission.org.uk> wrote:
Dear Alex,

As part of our assessment, we must be satisfied that your company is carrying on business within the UK. Could you please provide evidence of your company carrying on business.

We will not be able to proceed with this assessment until this information is provided.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Alex Crowley <[redacted]>
Sent: 29 October 2019 14:26
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Fair Tax Campaign Ltd - registration CCM:0288605

Thanks.

I'm sure you've seen that a December polling day is shortly to be passed in the House, so it would be helpful to have the registration confirmed as soon as you can.

Sent from my iPhone

From: Partyreg
Sent: 29 October 2019 11:50
To: 'Alex Crowley' <[redacted]>
Subject: RE: Fair Tax Campaign Ltd - registration CCM:0288605

Dear Alex,

Thank you for confirming this with me, we will proceed to assess your notification.

You can find our guidance about non-party campaigning here – this covers what is and is not considered regulated activity.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Alex Crowley <[redacted]>
Sent: 28 October 2019 17:10
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Fair Tax Campaign Ltd - registration CCM:0288605

Dear [redacted],

Further to our conversation last week, I'd like to clarify the scope of our intended campaign.

Having reviewed our budget I can confidently say that our campaign will comfortably exceed the spending threshold for registering a third party campaign, principally through Facebook advertising and other digital platforms.

Given it would be reasonable and prudent to assume that a General Election is imminent, and therefore any issue campaigning will take place in the context of a live electoral contest, we'd like to proceed to registering as soon as possible.

Look forward to hearing from you.

Many thanks
Alex

Sent from my iPhone

On 24 Oct 2019, at 15:35, Partyreg <Partyreg@electoralcommission.org.uk> wrote:

Dear Alex,

We have received your notification to register 'Fair Tax Campaign Ltd' as a non-party campaigner.

I was hoping to speak to you in relation to your notification. If you are available this week, please could you call me on 020 7271 [redacted].

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

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Alex Crowley

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---------- Original Message ----------
From: [redacted]
Received: 31/10/2019 17:00
To: Operation Dharmic Vote
Subject: RE: GE2019 Non Political Party Campaigner - Registration & guide CCM:0336811

Hi Mukesh,

Thank you for your email to the Electoral Commission. From the information provided, it is possible that your activity could be regulated. I have provided general advice below. Specific answers to your queries can be found at the end of this email but please do take time to read the general advice.

Non-party campaigner (NPC) rules

NPC's are individuals or groups that campaign during elections but do not stand candidates. Spending incurred by NPC's is regulated during a specific period prior to an election or national referendum. We call this the regulated period. The regulated period for a UK Parliamentary General Election is 12 months long. This applies regardless of when the election was called. For example, in 2017 the election was called 2 months before polling day. This meant that some parties and NPC's may have incurred campaign expenditure before an election was planned.

Campaign activity is defined as anything that can be reasonably regarded as intending to influence voters to vote for certain candidates, parties or categories of candidates. When considering if an activity is campaign expenditure and therefore, if the associated expenses are regulated during the regulated period, you should consider the **public** and **purpose** tests.

1) **The public test**
Can the public see and/or engage with the activity?

The public test is met if an activity is aimed at the public or a section of the public. Members and committed supporters of a campaign group do not count as members of the public.

2) **The purpose test**
Can the activity be reasonably regarded as intending to influence voters to vote for certain parties, candidates or category of candidates? Please note that this should be viewed from the perspective of the voter, therefore the intension of the campaigner/organisation is less relevant.

You can work out whether a campaign meets the purpose test by looking at the following:

- whether it includes a call to action to voters
- tone
- context and timing
- how a reasonable person would see your activity

These factors should be considered as a whole rather than individually. You can find more information on the purpose test on our website.

For more information on determining whether activity is regulated, please see our guidance for NPC's.

There are two types of NPC; local NPC's and general NPC's

- **Local campaigns –** non-party campaigns for or against one or more candidates in a particular constituency, ward or other electoral area
- **General campaigns** - non-party campaigns for or against a political party, or particular categories of candidates, including campaigns on policies or issues closely associated with a particular party or category of candidates (for example, candidates in a certain age group). These are relevant at national elections e.g. a UK Parliamentary General Election, UK Referendum

General campaign spending

NPC's must register with the Electoral Commission if they intend to spend over £10,000 in Scotland, Wales or Northern Ireland or over £20,000 in England.

If you do not intend to spend up to these thresholds, it will not be necessary to register.

Registered NPC's are then permitted to spend over the threshold and up to certain limits:

England - £319,800
Scotland - £55,400
Wales - £44,000
Northern Ireland - £46,100

However, NPC's must not spend more than **£9,750 per constituency**. If you intend to engage in focussed constituency spending, you should familiarise yourself with our factsheet.

Local campaign spending

You should also be aware that NPC's can spend up to **£700 campaigning for certain candidates**. To exceed this limit, you must first get the authorisation of the candidate concerned. This is because the excess spending must be reported by the candidate and therefore will count towards their limit. In this case, you will also be required to submit a spending return to the local authority detailing the spending related to the candidate's campaign.

Further information on campaign spending for NPC's can be found on our website. This document may be particularly useful.

Though the Commission can provide advice to local NPC's, we do not regulate these rules. Breaches of these rules are dealt with by the police.

Donations

Registered NPCs must only accept donations, with a value of over £500, from certain permissible sources. If you intend to raise a large amount of money, you should familiarise yourself with our donations guidance for NPCs. Permissible sources are:

- Most UK-registered companies.
- An individual registered on a UK electoral register, including overseas electors and those leaving bequests.
- A UK-registered trade union.
- A UK-registered building society.
- A UK-registered limited liability partnership (LLP) that carries on business in the UK.
- A UK-registered friendly society.
- A UK-based unincorporated association that carries on business or other activities in the UK.

Reporting

After the election, registered NPCs are required to report details of all spending incurred (or used) within the 12 month regulated period and all donations received in line with their campaign activities. The return must be accompanied by invoices for all payments with a value of over £200.

Values for each of the following types of expenditure must be included in the return:

- Payments made
- Notional spending
- Unpaid claims
- Disputed Claims

The return must be submitted within 3 months of the election (total spend £250,000 or under) or within 6 months of the election (over £250,000). NPC's spending over £250,000 must also submit an independent auditors report.

Registering

As noted above, NPC's are only required to register if they intend to spend over £10,000 in Scotland, Wales or Northern Ireland or over £20,000 in England **during a regulated period.**

If an election is called and you think that your spending is likely to reach these values, it will be necessary to register.

If you need to register with us you will need to submit a notification. You can find guidance about registration on our website.

Whilst we process all registration applications as quickly as possible, undertaking our necessary assessment process means that a decision will not be granted immediately. If we have all of the information we need, it usually takes on average about a week to receive a decision. You should ensure that you lodge your application with us in good time for us to undertake this assessment before you spend over the registration threshold.
Your registration lasts for 15 months from the date on which you are registered

Your Queries

1. **Register**

Answer in “registering” section above

2. **Fund raising** - apart from people giving us money directly, we were planning on doing "crowd funding" - Are there any guide lines on this please?

There are certain rules that registered NPC’s must adhere to regarding the receipt of donations. For example, NPC’s must only accept donations, with a value of over £500, from certain permissible sources as noted above. Therefore, if you are crowdfunding, you must ensure that you are able to access the relevant information to check permissibility. Further information can be found here in our guidance on crowdfunding

3. **GE17 results data by constituencies** - Could you please guide / provide any links to get a detailed set of data on these.

The Commission does not hold this data.

4. **What Electoral data / Census data linking religious data** to Wards and constituencies are there for analytical purposes? Suggested sources would be a great help.

Again, I’m afraid we do not hold this data, as such I am unable to assist with this query.

5. **Electoral Register Data** - As a Non-Political Party campaigner - are we able to access these? If so where from?

Registered NPC’s are entitled to access the electoral register for electoral purposes. Once registered, you will be able to request the registers from the relevant local authorities.

6. **GDPR Data Protection** - Are there any guide lines on this for our campaign and holding data for future Elections both local and national?

The Commission is unable to provide advice on GDPR, if you have concerns please contact the Information Commissioners Office.

I hope this information has been helpful,

Kind regards,

[redacted]

[redacted]

The Electoral Commission
020 7271 [redacted]
electoralcommission.org.uk

From: Mukesh Naker [redacted]>
Sent: 30 October 2019 15:17
To: [redacted]
Subject: GE2019 Non Political Party Campaigner - Registration & guide

Newsletters, Internet & Social Media

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

30/10/19

Dear [redacted]
Re GE2019 Non Political Party Campaigner - Registration & guide

I just left a message for you. If you could email / give me links so that I could
1. Register
2. Fund raising - apart from people giving us money directly, we were planning on doing "crowd funding" - Are there any guide lines on this please?

3. GE17 results data by constituencies - Could you please guide / provide any links to get a detailed set of data on these.
4. What Electoral data / Census data linking religious data to Wards and constituencies are there for analytical purposes? Suggested sources would be a great help.
5. Electoral Register Data - As a Non-Political Party campaigner - are we able to access these? If so where from?
6. GDPR Data Protection - Are there any guide lines on this for our campaign and holding data for future Elections both local and national?
Kind Regards

Mukesh Naker

Promoted by **Operation Dharmic Vote**
Mobile [redacted]

Twitter [redacted]
[redacted]
Facebook - [redacted]
Websites - http://www.dsp.today/to-make-the-dharmic-voter-politically-significant-in-local-and-national-elections-to-all-political-parties/

From: [redacted]
To:
Subject: Re: Guidance for non-party campaigners CCM:0229200
Date: 02 October 2019 15:11:47

Hi [redacted]

Thank you very much for your email.

I have just printed the guidance you mentioned than you and am now reading up in depth on managing non-party campaign spending so all very helpful thank you. Although I may have more questions yet, apologies.

Thank you also for letting me know about the briefing session - that would be invaluable. I'll sign up now.

Many thanks

[redacted]

On Wed, 2 Oct 2019 at 11:12, [redacted] <[redacted]> wrote:

> Hi [redacted],
>
> [redacted] is still compiling a response for your queries below and will come back to you soon.
>
> I just wanted to let you know that we have recently published new guidance for non-party campaigners which you can find on our website here: https://www.electoralcommission.org.uk/non-party-campaigners-where-start
>
> We will be holding a briefing session for non-party campaigners on the new guidance on Wednesday 9 October. If you would like to attend you can book a place using this link: https://tocyn.cymru/event/29f18351-c707-44c7-bb05-5dccd1908349/s
>
> Best regards
>
> [redacted]
>
> ---
>
> **From:** [redacted] <[redacted]>
> **Sent:** 01 October 2019 09:12
> **To:** [redacted] <[redacted]>
> **Cc:** [redacted] <[redacted]>
> **Subject:** Re: Couple of questions with regards to potential GE CCM:0307224

Dear [redacted]

Many thanks for your email. Thank you very much for forwarding the email to your colleagues that's very helpful.

I look forward to hearing from you when you know more.

Many thanks

[redacted]

On 30 Sep 2019, at 10:54, [redacted] <[redacted]> wrote:

> Dear [redacted],
>
> Apologies for the delay in getting back to you. I was off work for most of last week.
>
> I have forwarded your email on to my colleague in the guidance team as some of the questions below are quite technical and require some advice from guidance team colleagues.
>
> As soon as I have had a response from them, I will be able to forward you the information.
>
> Kind regards,
>
> [redacted]
>
> [redacted]
>
> **Y Comisiwn Etholiadol, Cymru | The Electoral Commission, Wales**
> 029 2034 [redacted]
>
> comisiwnetholiadol.org.uk | electoralcommission.org.uk
>
> Siaradwch gyda ni yn Gymraeg neu'n Saesneg
> Talk to us in Welsh or English
>
> **From:** [redacted] <[redacted]>
> **Sent:** 25 September 2019 14:16
> **To:** [redacted] <[redacted]>
> **Cc:** [redacted] <[redacted]>
> **Subject:** Re: Couple of questions with regards to potential GE
>
> Dear [redacted] and [redacted]
>
> Hope you are well.Thank you again for you time and support and apologies if we are asking obvious questions this is all just a steep learning curve for us. These are the questions we have compiled as we have been making our preparations (as registered non-party

campaigners) for a GE being called.

1. With regards to donations reporting - the vast majority of the money we have raised through crowdfunder has come in at individual donations of well under £500 (our average donation is £30). When these funds are used for regulated spend I would like to confirm please that this means we will not need to give you any details about this money in the donation reporting. This covers both the pre-poll reporting as well as in the report of the donations we submit after the election has taken place. It is conceivable that our entire regulated spend budget would come from money through crowdfunder that has all come in at less than £500 per crowdfunder donation. I am just checking that we are correct in assuming no reporting on the donations under £500 would be needed.

2. Does our regulated spend for the EU elections in May count towards our regulated spending limits for a UK Parliamentary GE, we are assuming so but just wanted to check please?

3. Are we safe to assume that a regulated period will begin 12 months prior to the polling day for a snap GE?

4. Are we safe to assume the spending limits for the 2017 GE for non-party campaigners will remain the same?

5. With regards to our reporting requirements after the election. Are we correct in assuming that we will need to send you a qualified auditor's report on our spending return if we spend over £250,000 but not if we spend under it.

6. Also with regards to a statement of accounts, Led By Donkeys registered as a Limited Company by Guarantee on the 10th July 2019. Does this mean we would need to submit a statement of accounts from the beginning of the regulated period until that date, and then from the 10th July 2019 the information you would need would be provided through our accounting requirements as a Ltd Company?

7. Are we correct in assuming that an auditor's report is different from an auditor's report on a statement of accounts? I am a little confused as to what an auditor's report on a statement of account is please. On page 22 of The Electoral Commission overview document "UK Parliamentary general election 2017: Non-party campaigners", it states that auditor's report will also be required on the statement of accounts if the following was over £250,000 - and then details 3 conditions. Led By Donkeys will meet two of those three conditions as our gross recorded income from all sources will be over £250,000 as well as our total expenditure including on activity that was not regulated will be over £250,000. Could you please clarify what is needed from us in terms of reporting so I can prepare with our accountants. (I have found the link to the guidance on auditor's reports but could not find any guidance on a statement of accounts).

8. With regards to targeted spending we have a question please with regards to a billboard we are currently thinking of doing. We would very much appreciate you treat this information as confidential please as we

have not released the artwork yet for this billboard. It has a picture of Jeremy Corbyn and Jo Swinson and says, sort out your alliance otherwise the Conservatives will win. Would this qualify as targeted spending although it doesn't target either the Lib Dems or Labour as ones to vote for but it does imply that stopping the Conservatives is the ultimate aim?

> 9. Finally, please could we have some guidance on how to attribute regulated spend on some of our billboards in a regulated period. The area of confusion being that we often post billboards in areas that have nothing to do with a constituency and then put the images on social media, so it then becomes a UK wide spend. I am guessing given that it is a regulated period, a proportion of that spend would need to be recorded as constituency spend, even if the billboard message was not targeted at the MP in that constituency.
>
> Many thanks again for all your help and support we can imagine that this a very busy time for you.
>
> Kind regards
>
> [redacted]

On Fri, 20 Sep 2019 at 13:13, [redacted] <[redacted]> wrote:

> Hello [redacted]
>
> Many thanks for the email. Just to say that we're currently compiling a few questions to send to you. We've a meeting specifically about some areas of GE compliance on Monday so will email you back early next week with those.
>
> Thank you again and hope you have a lovely weekend.
>
> Kind regards
>
> [redacted]
>
> On Fri, 13 Sep 2019 at 14:24, [redacted] <[redacted]> wrote:
>
> > Hi [redacted],
> >
> > Thanks for the email.
> >
> > Can I suggest that you email the questions to us, as we may have to discuss them with colleagues and consult legislation in order to provide you with clear guidance?
> >
> > We can then ensure that you have all the necessary information to assist you with any potential reporting that may be required.
> >
> > Kind regards,

[redacted]

[redacted]

Y Comisiwn Etholiadol, Cymru | The Electoral Commission, Wales
029 2034 [redacted]

comisiwnetholiadol.org.uk | electoralcommission.org.uk

Siaradwch gyda ni yn Gymraeg neu'n Saesneg
Talk to us in Welsh or English

From: [redacted] <[redacted]>
Sent: 12 September 2019 15:01
To: [redacted] <[redacted]>; [redacted] <[redacted]>
Subject: Couple of questions with regards to potential GE

Hello [redacted] and [redacted]

Hope you are both well and had a good summer. I am sure you are very busy now given what has been going on in Westminster.

I am just making sure that I have wrapped my head around the documents you kindly shared with me this summer. I've been looking in particular at the "UK Parliamentary general election 2017: Non-party campaigners" overview. I just have a couple of questions with regards to attributing spending with regards to parliamentary constituencies.

I also have been keeping an eye on our campaigns and taking into account the purpose test and public test. I would appreciate your advice please on a couple of judgement calls I have made. Is there a good moment to come and see you at all?

I am guessing you are very busy. Just in case this helps I am tied up next week but available between Weds 25th, Thurs 26th and Fri-27th September. And Weds 2nd October, Thursday 3rd and Friday 4th October.

Many thanks again

[redacted]

---------- Original Message ----------
From: PEF Inbox
Received: 26/11/2019 17:10
To: Kate Rodde; Katharine Rodde
Subject: RE: HELP on submission Re: Led By Donkeys – Registration confirmation CCM:0389292

Dear Kate

The responsibility for submitting pre-poll returns lies with the Responsible Person. This may be the reason why you are unable to submit.

For your information, there is no requirement for a non-party campaigner to submit a nil donations return. You only need to submit a donations return if you receive a reportable donation during a particular reporting period. If you do not receive a reportable donation, you do not need to submit a donations return.

There is no requirement for non-party campaigners to submit pre-poll transactions returns. Although you may see that PEF Online automatically generates pre-poll transactions returns for you, you do not need to submit any pre-poll transactions returns.

Best regards

[redacted]

[redacted]
[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Kate Rodde [redacted]
Sent: 25 November 2019 19:39
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: HELP on submission Re: Led By Donkeys – Registration confirmation CCM:0389292

Dear [redacted]

Thank you for processing the registration.

However I have a technical issue in submitting the first return and need your help please. See screenshot below with message saying "To submit the return contact your PEF Online Administrator or Responsible Person"
Does this mean that I need extra access or something, do I need you to submit on our behalf each time (this seems unlikely!)

Thanks for your urgent advice

Kate

On Fri, 22 Nov 2019 at 15:26, Partyreg <Partyreg@electoralcommission.org.uk> wrote:
Dear Kate and Oliver,

Registration of Led By Donkeys Ltd.
I write to inform you that we have processed and approved your notification to register **Led By Donkeys Ltd.** as a non-party campaigner which was submitted on 13 November 2019 and considered complete on 20 November 2019. Your registration is in effect from 20 November 2019.

You have been allocated reference [redacted], which should be quoted on all communications and returns sent to us. The reference is a safeguard so that we can be certain that any correspondence, returns etc. received in your NPC's name are genuine. We advise you no to publicise this number.

Non-party campaigner (NPC) contact details
We confirm the following details for your non-party campaigner registration. Please contact us if any of these details are incorrect or change.

The NPC's address, name, the names of the responsible person and secretary, and relevant participators will appear on the register. Other details such as addresses of individuals will not appear on the register.

Your entry on the register is:
http://search.electoralcommission.org.uk/English/Registrations/TP10353
(please allow a day for the entry to appear on the register)

	Post/Home address	Email	Telephone
Campaigner Headquarters	71-75 Shelton Street, London, Greater London, United Kingdom, WC2H 9JQ	[redacted]	[redacted]

Responsible person: Oliver Knowles	-	[redacted]	[redacted]
Secretary: Katharine Rodde	-	[redacted]	[redacted]
Names of relevant participators:	• Ben Stewart • James Sadri • Oliver Knowles • Will Rose		

Guidance

You can find our general guidance for NPCs here and our guidance for the 2019 elections here. If you have any questions about spending or reporting, please contact pef@electoralcommission.org.uk

Enforcement

Failure to comply with the obligations may be a criminal offence which can attract prosecution or civil sanctions, including a fine. You can find our enforcement policy here.

NPC renewal deadline

To remain registered you must submit renewal each year. This must be delivered between one month before and up to three months after, the anniversary of when the original notification was provided to us.

Your renewal deadline is 20 February 2021. You should set a reminder for this deadline if you intend to renew your registration. If your NPC is not renewed, it will be removed from the register. This can be completed either online or by using a TP3 form.

Electoral register

Legal restrictions apply on the use of the electoral register accessed by NPCs. It can only be used for electoral purposes and the control of donations. Breaching the restrictions on the use of the electoral register can result in an unlimited fine in England and Wales or a fine of up to £5,000 in Scotland.

Please contact us if you have any further questions.

Yours sincerely,

[redacted]

From: Kate Rodde [redacted]
Sent: 20 November 2019 16:43
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: FW: Led By Donkeys – receipt of notification CCM:0389282

Hi, Further to my call to [redacted] flagging an apparent system issue I have now managed to resolve the bug so please disregard my cry for help!

Regards
Kate Rodde
on behalf of Led by Donkeys Ltd

On Wed, 20 Nov 2019 at 14:54, Led By Donkeys <[redacted]> wrote:
Hi Kate

Here's the note from the Elec Commission. They are asking us to update three sections which we can now do ourselves.

Note that they say here, the person who signs should have overall administrative control of the company which is a bit different to how it was put on the call. I explained your role and they thought that was fine, so I think if you are happy then please sign. I was clear that we as the four company directors have overall responsibility for the outputs and compliance.

Give me a shout with any questions Kate. Many thanks.

Olly

---------- Forwarded message ---------
From: **Partyreg** <Partyreg@electoralcommission.org.uk>
Date: Tue, 19 Nov 2019 at 15:40
Subject: FW: Led By Donkeys – receipt of notification CCM:0389282
To: [redacted] <[redacted]>

Dear Oliver,

Thank you for your time in taking my call just now.

As discussed on the phone, I have rejected your notification in PEF Online. To amend the details of it, log back into the system and click the “amend rejected application” button.

You will then be able to address the points covered in my email below and in our telephone conversation, and then re-Submit the notification. This includes the following actions:

1. Amend the name of the company to “Led By Donkeys Ltd” under the “Organisation details” tab

2. Add yourself as a relevant participator under the “Relevant Participators” tab

3. Add the details of the company secretary (or similar) under the “Users” tab, and then assign them the role of secretary under the “User roles” tab

In line with point 3 above, it would be helpful if you could please respond to this email explaining how this person fulfils the role of secretary (or similar) for your company and how they therefore are authorised to sign the notification. This person who is the signatory should be the person who has overall administrative affairs of the company.

If you have any further questions then please get in touch.

Yours sincerely,

[redacted]

From: Partyreg
Sent: 15 November 2019 08:57
To: [redacted]' <[redacted]>
Subject: Led By Donkeys – receipt of notification

Dear Oliver Knowles,

Thank you for your notification to register as a non-party campaigner, which we received on 13 November 2019. Led By Donkeys is not registered until we confirm this in writing.

We have conducted an initial check of the notification and have identified matters that require your attention. We would be grateful if you could please address the matters raised below as soon as possible, and not later than Monday 18 November 2019.

Matters for consideration
It is your responsibility to determine the details of your notification and to ensure that it complies with the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA).

The following matters were identified on an initial check of your notification. You now have an opportunity to address them before the application is assessed in full.

Should the notification proceed to a full assessment against the PPERA requirements, further matters may be identified. Until a final decision is taken on your notification, we cannot confirm whether or not it will be successful.

Unless these issues are resolved, the notification may be refused.

Relevant participators

A notification to register a third party must specify the names of its relevant participators. For a company, these are the company's directors.

You are listed as a director for the company on companies house, but you have not been listed as a relevant participator in your notification.

Please confirm whether or not you are a company director. If you are, then the notification will need to be amended to reflect this.

Name of the company

You have applied to register as a company. The name of the company on the companies house register is "Led By Donkeys Ltd", whereas the name contained in your notification is simply "Led By Donkeys".

Please could you confirm that the correct name for your company is "Led By Donkeys Ltd"? If so, the notification can be amended accordingly.

Secretary

A notification to register a company as a third party must be signed by the company's secretary or, if the company doesn't have a secretary, the person who acts in a similar capacity for the company.

We note from companies house that your company is not registered with a secretary.

Therefore, could you please confirm that you are the secretary and, if you are not the secretary, how you act in a similar capacity and therefore authorised to sign the notification?

If you are not the correct person to sign the notification, then the notification will need to be re-signed.

Next steps

If you intend to amend your notification please do so as soon as possible and no later than 18 November 2019. **If you would like to make these changes online, please let us know.**

After that date we will review any amendments or additional information you provide to us. The Registration Team will check your notification to make sure that it meets the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA). The Director of Regulation will then take the final decision whether or not to approve your registration.

We aim to process a notification as quickly as possible after receipt of a complete and compliant notification.

You can find guidance in relation to registering a non-party campaigner, as well as the non-party campaigner spending rules for specific elections on our website.

Rules for non-party campaigners (NPCs)
If a non-party campaigner does not register, then it cannot spend more than £20,000 in England and £10,000 in Scotland, Wales and Northern Ireland on regulated campaign activity. The spending limits for registered non-party campaigners are set out in our guidance for non-party campaigners on our website.

A non-party campaigner cannot spend above the relevant threshold until it submits a registration notification to us that contains all of the information required by PPERA, and it should not spend above the threshold until we have confirmed its registration in writing. If you have already exceeded the registration threshold, you should not undertake any more regulated campaign spending until we have confirmed your registration in writing.

You can find the rules on imprints here.

Please note there are strict legal restrictions apply on the use of the electoral register accessed by a registered NPC. It can only be used by registered NPCs for electoral purposes and the control of donations.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

---------- Original Message ----------
From: MTCAE Limited
Received: 17/11/2019 01:57
To: [redacted]; Partyreg
Subject: Re: MTCAE Limited - Registration confirmation CCM:0462741

Dear [redacted],

Thank you for confirming that MTCAE Ltd is now registered. I am aware of the significant regulatory obligations this status places on us and will continue to seek specialised legal advice to guide all campaign activities.

Many thanks,
Ben

On Fri, 15 Nov 2019 at 10:57, Partyreg <Partyreg@electoralcommission.org.uk> wrote:

Dear Ben,

Registration of MTCAE Limited

I write to inform you that we have processed your notification to register **MTCAE Limited** as a non-party campaigner which was submitted on 07 November 2019. MTCAE Limited are now registered as a non-party campaigner – your registration is in effect as of 11 November 2019.

Your entry on the register is:

http://search.electoralcommission.org.uk/English/Registrations/TP11364

(please allow a day for the entry to appear on the register)

Contact us immediately if any of the details outlined below or in the campaigner's entry on the register are incorrect or are not what the campaigner intended.

Your non-party campaigner has been allocated the following unique reference [redacted], which should be quoted on all communications and returns sent to us. The reference offers a safeguard so that we can be certain that any correspondence, returns etc received in your non-party campaigner's name are genuine. It is therefore in your own interest to ensure that only those officers who need to communicate with us have access to the reference.

A registered non-party campaigner must comply with the controls and responsibilities set out in the Political Parties, Elections and Referendums Act 2000 (PPERA), particularly in relation to spending on regulated campaign activity. We urge strongly that you familiarise yourself with our guidance for non-party campaigners. Specific guidance on the rules relating to the UK Parliamentary general election 2019 can be found here.

Failure to comply with the obligations may be a criminal offence which can attract prosecution or civil sanctions, including a fine. You can find our enforcement policy here.

Non-party campaigner contact details

We confirm the following details for your non-party campaigner registration.

The campaigner's address and the names of the campaigner's responsible person and secretary will appear on the register, as will the names of the campaigner's relevant participators. Other details, including all email addresses and telephone numbers, will not appear on the register. The address provided for a campaigner registered as an individual will also not appear on the register.

	Post/Home address	**Email**	**Telephone**
Campaigner Headquarters	19-20 Bourne Court Southend Road Woodford Green Essex IG8 8HD	[redacted]	[redacted]
Responsible person: Ben Tait	[redacted]	[redacted]	[redacted]
Secretary: Ben Tait	[redacted]	[redacted]	[redacted]
Names of relevant participators:	• **Ben Tait**		

If your registered details change, you should notify us as soon as possible as this may affect who has responsibility for the campaigner's compliance with PPERA. It will also enable us to ensure that any reminders and information are sent to the correct person at the right address.

Non-party campaigner renewal deadline

In order to remain registered, a non-party campaigner is required to submit a notification of renewal each year. This must be delivered within a period beginning one month before and ending three months after the original notification to register was provided to us (unless the end of that period falls within a regulated period, under which circumstances different rules will apply).

This means that the first renewal notification can be delivered between 11 October 2020 and 11 February 2021. We urge strongly that you set yourself a

reminder to do this each year. If we do not receive a complete and compliant notification by the deadline we are required by law to remove the campaigner from the register.

This can be completed either online or by completing and returning a TP3 form to us.

Electoral register

Strict legal restrictions apply on the use of the electoral register accessed by a registered non-party campaigner. It can only be used by registered non-party campaigners for electoral purposes and the control of donations. Any person found breaching the restrictions on the use of the electoral register could face an unlimited fine in England and Wales or a fine of up to £5,000 in Scotland.

Please contact us if you have any further questions.

Yours sincerely,

[redacted]

[redacted]

The Electoral Commission

electoralcommission.org.uk

From:
To:
Cc:
Subject: Re: Non-party campaigner guidance CCM:0307194
Date: 12 July 2019 10:19:33

Dear [redacted] and [redacted],

Hope you're well Many thanks for your email and the chat on Wednesday. That is good news about not needing to submit a spending return.

Yes of course I will confirm the details of the spend by area.

I still haven't paid the invoice and will wait to hear back from you on that.

Kind regards

[redacted]

On 10 Jul 2019, at 15:01, [redacted] <[redacted]> wrote:

> [redacted],
> Thank you for your emails, and it was good to meet with you yesterday.
> I have spoken with my colleagues in Party and Election Finance today, and they have informed me that as you did not actually reach the threshold of £20,000 in England, or £10,000 in Wales, Scotland or Northern Ireland, you will not have to submit a spending return.
> What we do ask, is that you send an email to us to confirm the total amount that was spent on your campaign (and by area if possible), and to say that as you have not reached the spending thresholds, you will not be submitting a return to us.
> One thing I did want to check with you is that I noticed you have received the missing invoice we discussed. Can you tell me if you have paid this yet? If you have not made payment, I can provide you with some further advice regarding this prior to you paying it.
> I hope this information is helpful.
> Kind regards,
> [redacted].
> **From:** [redacted]
> **Sent:** 09 July 2019 21:13
> **To:** [redacted]; [redacted]
> <LWard@electoralcommission.org.uk>
> **Subject:** Re: Non-party campaigner guidance CCM:0307194
> Hello [redacted] and [redacted] again
> Just a quick update on my earlier email. I can't quite believe it but I've been sent the invoice - my phone calls and emails today seem to have worked! See attached - I will pay this straight away.
> Many thanks
> [redacted]
> On Tue, 9 Jul 2019 at 16:49, [redacted] <[redacted]> wrote:
>
> > Dear [redacted] and [redacted]
> > Many thanks for the meeting today. I really appreciated the support and you made things much clearer thank you for your time.
> > I got back and checked my spreadsheet straight away and we had in fact booked 6 boards through the supplier I was thinking of and the missing invoice is for £2116.80. I am sorry I should have realised I really feel disappointed in myself that I did not think of this until today.
> > I was right in remembering about the billboard in Cardiff through them that we never posted but I had not remembered that we had 5 other boards with them that were posted in London, Bristol and Birmingham. We use several different suppliers and I am sorry it was an incredibly stressful time when it all happened.
> > I have attached the budget confirmation I had from this supplier on the 15th May for £2116.80. That is the only outstanding invoice from the European Parliamentary elections. As I said with every other supplier we pay ahead of posting so this is the only supplier that hasn't been paid. Unfortunately this supplier is notoriously slow at invoicing.
> > I called the supplier straight away now and have asked for an urgent invoice so that I can pay it in the next day or two. He has promised that he will look into making sure the accounts department send me an invoice straight away. I am very sorry. Please let me know your thoughts and I do apologise again, I will make sure that doesn't happen again.
> > Kind regards
> > [redacted]
> > On Tue, 9 Jul 2019 at 15:04, [redacted] <[redacted]> wrote:
> >
> > > Hello [redacted]

Just to let you Know I am here just having my bike put in bike cage.
Many thanks
[redacted]

Sent from my iPhone

On 3 Jul 2019, at 09:51, [redacted] <[redacted]> wrote:

> Hi [redacted],
> Yes, I will inform security that you are meeting us, and will reserve you a parking space. If you then come to reception and let them know that you are meeting with the Electoral Commission, they will issue you with a pass, and I will come to meet you.
> Kind regards,
> [redacted].
> **From:** [redacted] <[redacted]>
> **Sent:** 02 July 2019 14:45
> **To:** [redacted]
> **Cc:** [redacted]
> **Subject:** Re: Non-party campaigner guidance CCM:0307194
> Hello [redacted]
> Thank you that's great see you then. Should I just come to the reception at Companies House?
> Many thanks
> [redacted]
> On Tue, 2 Jul 2019 at 10:48, [redacted] wrote:
>
> > Hi [redacted] a,
> > Let's go for 3pm next Tuesday.
> > Thanks,
> > [redacted].
> > **From:** [redacted]
> > **Sent:** 01 July 2019 17:41
> > **To:** [redacted]
> > **Subject:** Re: Non-party campaigner guidance CCM:0307194
> > Hello [redacted]
> > Many thanks for the email. On Tuesday I could meet at 3pm if that's convenient?
> > Kind regards
> > [redacted]
> > On Mon, 1 Jul 2019 at 14:02, [redacted] <[redacted]> wrote:
> >
> > > Hi [redacted],
> > > The Wednesday is a busy day for us. Do you have any other times available on the Tuesday?
> > > Thanks,
> > >
> > > [redacted]
> > > **From:** [redacted]
> > > **Sent:** 01 July 2019 13:56
> > > **To:** [redacted]
> > > **Cc:** [redacted]
> > > **Subject:** Re: Non-party campaigner guidance CCM:0307194
> > > Hi [redacted]
> > > Thanks for the email sorry just had a meeting scheduled for 10.30 on Tuesday. I could do 10am on Weds 10th if that's any good?
> > > Many thanks
> > > [redacted]
> > > On Mon, 1 Jul 2019 at 13:39, [redacted] <[redacted]> wrote:
> > >
> > > > Hi [redacted],
> > > > Thanks for letting us know. How about Tuesday 9 July at 11am?
> > > > Thanks,
> > > > [redacted].
> > > > **From:** [redacted]
> > > > **Sent:** 01 July 2019 13:34
> > > > **To:** [redacted]
> > > > **Cc:** [redacted]
> > > > **Subject:** Re: Non-party campaigner guidance CCM:0307194
> > > > Hello [redacted] and [redacted]
> > > > Hope you're well. I'm sorry to have to change the time of our meeting this week on the 4th July as I'm afraid I now have to go to London on that day.
> > > > Could you please let me know your availability for next week? I am free apart

from the 11th and 12th.
Apologies again

[redacted] 21 Jun 2019 at 14:15, [redacted] wrote:

> Hello [redacted]
> That's a perfect time thank you very much and I'll look at the information you've sent too.
> Many thanks again
> [redacted]
>
> On 21 Jun 2019, at 12:42, [redacted] <[redacted]> wrote:
>
> > Hi [redacted],
> > Shall we say Thursday 4th July at 10:30am, at our offices in Companies House in Cardiff?
> > To provide you with some assistance prior to the meeting, this is the link to our guidance document:
> > https://www.electoralcommission.org.uk/__data/assets/pdf_file/0016/252142/European-Parliament-NPC-2019.pdf
> > On page 20 of the guidance document, you will find the key deadline requirements. These deadlines are set out in law and must be met:
> >
> > • You must receive all invoices on or before **Monday 24 June**. (This coming Monday).
> >
> > • You must pay all invoices on or before **Monday 22 July**.
> >
> > • You must report your campaign spending by **Friday 23 August**.
> >
> > Kind regards,
> > [redacted].
> > **From:** [redacted]
> > **Sent:** 21 June 2019 12:08
> > **To:** [redacted]
> > **Subject:** Re: FW: Non-party campaigner guidance CCM:0307194
> > Hello [redacted]
> > Many thanks for your email and apologies for my late reply I was away from my desk this week. That is much appreciated that you are able to meet thank you.
> > I am free to meet on Thursday 4th July or Friday 5th July in the morning.
> > The week after I am very free on Monday 8, Tuesday 9th after 11.30am and before 2.30pm and Wednesday 10th currently flexible all day.
> > Many thanks again for your help.
> > Kind regards
> > [redacted]
> > On Mon, 17 Jun 2019 at 14:27, [redacted]:
> >
> > > Hello [redacted]
> > > [redacted] passed your email to me to contact you, as I am the main contact for regulatory assistance in the office in Cardiff.
> > > We'd be happy to meet with you and to provide you with some guidance.
> > > Can you send me some dates that are suitable for you, so that we can set something up?
> > > Kind regards,
> > > [redacted]
> > > **Y Comisiwn Etholiadol, Cymru | The Electoral Commission, Wales**
> > > 029 2034 [redacted]
> > > comisiwnetholiadol.org.uk | electoralcommission.org.uk
> > >
> > > Siaradwch gyda ni yn Gymraeg neu'n Saesneg
> > > Talk to us in Welsh or English

From: [redacted]
Sent: 13 June 2019 15:02
To: [redacted]
Subject: Re: Non-party campaigner guidance

Hello [redacted]

Hope you are well. I don't know if you remember me I got in touch before the European elections with regards to Led By Donkeys. We are now registered with the Electoral Commission and I am in the process of preparing our accounts to submit for the August deadline.

Given that this is the first time I have done this I would really appreciate any guidance available. Am I able to come and see anyone at the offices in Cardiff at all for a brief chat?

Many thanks

[redacted]

On Fri, 10 May 2019 at 14:46, [redacted] wrote:

> Hi [redacted],
>
> As discussed, here is our guidance on registering as a non-party campaigner:
> https://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/non-party-campaigners/2019-elections
>
> If you are planning to spend more than £20,000 in England or £10,000 in any of Scotland, Wales and Northern Ireland during a regulated period on regulated campaign activity, then you will need to register as a non-party campaigner.
>
> You can register online at https://pefonline.electoralcommission.org.uk/Default.aspx or by completing and returning a TP1 form.
>
> Regardless of whether or not you register as a campaigner, you will need to include an imprint on all campaign materials. You can read our guidance on imprints here.
>
> If you have any further questions after reading our guidance, please give me a call.
>
> Best regards
>
> [redacted]
>
> 029 2034 6807
> comisiwnetholiadol.org.uk | electoralcommission.org.uk
>
> Siaradwch gyda ni yn Gymraeg neu'n Saesneg
> Talk to us in Welsh or English

From: [redacted]
To:
Subject: Re: Non-party campaigner guidance
Date: 13 June 2019 15:02:10

Hello [redacted]

Hope you are well. I don't know if you remember me I got in touch before the European elections with regards to Led By Donkeys. We are now registered with the Electoral Commission and I am in the process of preparing our accounts to submit for the August deadline.

Given that this is the first time I have done this I would really appreciate any guidance available. Am I able to come and see anyone at the offices in Cardiff at all for a brief chat?

Many thanks

[redacted]

On Fri, 10 May 2019 at 14:46, [redacted] wrote:

> Hi [redacted],
>
> As discussed, here is our guidance on registering as a non-party campaigner:
>
> https://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/non-party-campaigners/2019-elections
>
> If you are planning to spend more than £20,000 in England or £10,000 in any of Scotland, Wales and Northern Ireland during a regulated period on regulated campaign activity, then you will need to register as a non-party campaigner.
>
> You can register online at https://pefonline.electoralcommission.org.uk/Default.aspx or by completing and returning a TP1 form.
>
> Regardless of whether or not you register as a campaigner, you will need to include an imprint on all campaign materials. You can read our guidance on imprints here.
>
> If you have any further questions after reading our guidance, please give me a call.
>
> Best regards
>
> [redacted]
>
> [redacted]
>
> [redacted]
>
> **Y Comisiwn Etholiadol, Cymru | The Electoral Commission, Wales**
> 029 2034 [redacted]

comisiwnetholiadol.org.uk | electoralcommission.org.uk

Siaradwch gyda ni yn Gymraeg neu'n Saesneg
Talk to us in Welsh or English

---------- Original Message ----------
From: Partyreg
Received: 20/11/2019 16:44
To: Mukesh Naker; Operation Dharmic Vote
Cc: Bharat Rana
Subject: RE: Operation Dharmic Vote - receipt of notification CCM:0462743

Dear Mukesh,

As discussed during our telephone conversation, please see the information below relating to relevant participators.

The notification must include the relevant participators of the body

- **Where the body has more than 15 members and has officers or a governing body, those officers or the members of that governing body;**
- **Otherwise the body's members.**

As discussed if we do not receive a response to all correspondence by 10am on 21 November 2019 the assessment of the notification will continue in its current form.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Partyreg
Sent: 19 November 2019 12:23
To: [redacted]
Cc: [redacted]
Subject: RE: Operation Dharmic Vote - receipt of notification CCM:0462743

Dear Mukesh,

As the deadline of 18 November 2019 has now passed. We will proceed with the assessment of the notification in its current form.

Yours sincerely,

[redacted]

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Partyreg
Sent: 15 November 2019 13:13
To: [redacted]
Cc: [redacted]
Subject: Operation Dharmic Vote - receipt of notification CCM:0462743

Dear Mukesh

Thank you for your notification to register as a non-party campaigner, which we received on 11 November 2019. **Operation Dharmic Vote** is not registered until we confirm this in writing.

We have conducted an initial check of the notification and have identified matters that require your attention. We will put your notification on hold until 18 November 2019 so that you can address the matters raised below.

Matters for consideration

It is your responsibility to determine the details of your notification and to ensure that it complies with the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA).

The following matters were identified on an initial check of your notification. You now have an opportunity to address them before the application is assessed in full.

Should the notification proceed to a full assessment against the PPERA requirements, further matters may be identified. Until a final decision is taken on your notification, we cannot confirm whether or not it will be successful.

Unless these issues are resolved, the notification may be refused

Relevant participators

The notification must include the relevant participators of the body. In this instance,

- where the body has more than 15 members and has officers or a governing body, those officers or the members of that governing body;
- Otherwise the body's members.

Could you please outline the body's members?

Secretary

Under the Political Parties, Elections and Referendums Act 2000 (PPERA), it is the secretary of an unincorporated association (or person who acts in a similar capacity) who must sign and submit the notification. Could you elaborate on your role in the organisation and why you are suitable to sign and submit the notification to the Commission?
If the notification is not signed by the secretary it must be signed by a person who acts in a similar capacity to a secretary in relation to the company.

Next steps

If you intend to amend your notification please do so as soon as possible and no later than 18 November 2019.

After that date we will review any amendments or additional information you provide to us. The Registration Team will check your notification to make sure that it meets the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA). The Director of Regulation will then take the final decision whether or not to approve your registration.

We aim to process a notification as quickly as possible after receipt of a complete and compliant notification.

You can find guidance in relation to registering a non-party campaigner, as well as the non-party campaigner spending rules for specific elections on our website.

Rules for non-party campaigners (NPCs)

If a non-party campaigner does not register, then it cannot spend more than £20,000 in England and £10,000 in Scotland, Wales and Northern Ireland on regulated campaign activity. The spending limits for registered non-party campaigners are set out in our guidance for non-party campaigners on our website.

A non-party campaigner cannot spend above the relevant threshold until it submits a registration notification to us that contains all of the information required by PPERA, and it should not spend above the threshold until we have confirmed its registration in writing. If you have already exceeded the registration threshold, you should not

undertake any more regulated campaign spending until we have confirmed your registration in writing.

You can find the rules on imprints here.

Please note there are strict legal restrictions apply on the use of the electoral register accessed by a registered NPC. It can only be used by registered NPCs for electoral purposes and the control of donations.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

---------- Original Message ----------
From: Operation Dharmic Vote
Received: 20/11/2019 17:30
To: [redacted] Partyreg
Cc: Bharat Rana; Mukesh Naker
Subject: Re: Operation Dharmic Vote - receipt of notification CCM:0462743

Dear [redacted],

Thank you for your help this afternoon.

As discussed, I have completed and updated the form. The fourth member of our Association, Mr Jitu Mistry has been added. As and when new members join, we will update the register of members.

Where our secretary is unable to update our records and details, I will be doing this in my role as the "responsible person" for Operation Dharmic Vote. Please confirm this is in order.

We look forward to having the registration confirmation asap.

Kind regards

Mukesh

On 15 November 2019 at 13:13 Partyreg wrote:

Dear Mukesh

Thank you for your notification to register as a non-party campaigner, which we received on 11 November 2019. **Operation Dharmic Vote** is not registered until we confirm this in writing.

We have conducted an initial check of the notification and have identified matters that require your attention. We will put your notification on hold until 18 November 2019 so that you can address the matters raised below.

Matters for consideration

It is your responsibility to determine the details of your notification and to ensure that it complies with the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA).

The following matters were identified on an initial check of your notification. You now have an opportunity to address them before the application is assessed in full.

Should the notification proceed to a full assessment against the PPERA requirements, further matters may be identified. Until a final decision is taken on your notification, we cannot confirm whether or not it will be successful.

Unless these issues are resolved, the notification may be refused

Relevant participators

The notification must include the relevant participators of the body. In this instance,

- where the body has more than 15 members and has officers or a governing body, those officers or the members of that governing body;

- Otherwise the body's members.

Could you please outline the body's members?

Secretary

Under the Political Parties, Elections and Referendums Act 2000 (PPERA), it is the secretary of an unincorporated association (or person who acts in a similar capacity) who must sign and submit the notification. Could you elaborate on your role in the organisation and why you are suitable to sign and submit the notification to the Commission?

If the notification is not signed by the secretary it must be signed by a person who acts in a similar capacity to a secretary in relation to the company.

Next steps

If you intend to amend your notification please do so as soon as possible and no later than 18 November 2019.

After that date we will review any amendments or additional information you provide to us. The Registration Team will check your notification to make sure that it meets the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA). The Director of Regulation will then take the final decision whether or not to approve your registration.

We aim to process a notification as quickly as possible after receipt of a complete and compliant notification.

You can find guidance in relation to registering a non-party campaigner, as well as the non-party campaigner spending rules for specific elections on our website.

Rules for non-party campaigners (NPCs)

If a non-party campaigner does not register, then it cannot spend more than £20,000 in England and £10,000 in Scotland, Wales and Northern Ireland on regulated campaign activity. The spending limits for registered non-party campaigners are set out in our guidance for non-party campaigners on our website.

A non-party campaigner cannot spend above the relevant threshold until it submits a registration notification to us that contains all of the information required by PPERA, and it should not spend above the threshold until we have confirmed its registration in writing. If you have already exceeded the registration threshold, you should not

undertake any more regulated campaign spending until we have confirmed your registration in writing.

You can find the rules on imprints here.

Please note there are strict legal restrictions apply on the use of the electoral register accessed by a registered NPC. It can only be used by registered NPCs for electoral purposes and the control of donations.

Yours sincerely,

[redacted]

[redacted]

The Electoral Commission

electoralcommission.org.uk

---------- Original Message ----------
From: Bharat Rana
Received: 22/11/2019 13:05
To: [redacted] Partyreg
Cc: Mukesh Naker; Mukesh Naker; Operation Dharmic Vote
Subject: Re: Operation Dharmic Vote - receipt of notification CCM:0462743

Hi there
I am very very confused. Please advise explicitly exactly what and where I must add information. The site is rather clumbsy. I am at work and it's so difficult with security limitations here on external websites that I cannot access to correct immediately..I have to do this after 6 on

Please use screen shots to show what's to be done.

Thank you for your patience. Much appreciated.
Regards Bharat

On Fri, 22 Nov 2019, 10:45 Partyreg, <Partyreg@electoralcommission.org.uk> wrote:

Dear Mukesh,

As Bharat is also a member of the association, Bharat will also need to be added to the list of relevant participators.

Please do this no later than 1pm.

Thanks,

[redacted]

From: Bharat Rana [redacted]
Sent: 21 November 2019 18:05
To: Partyreg <Partyreg@electoralcommission.org.uk>
Cc: [redacted]
Subject: Re: Operation Dharmic Vote - receipt of notification CCM:0462743

hello there,

i have just done this.

Bharat

[redacted]

On Thu, 21 Nov 2019 at 14:35, Partyreg <Partyreg@electoralcommission.org.uk> wrote:

Hi Mukesh,

Bharat will need to logon to the system and submit the application.

Please do this as soon as possible

Yours sincerely,

[redacted]

[redacted]

The Electoral Commission

electoralcommission.org.uk

---------- Original Message ----------
From: Partyreg
Received: 19/11/2019 12:22
To: Mukesh Naker; Operation Dharmic Vote
Cc: Bharat Rana
Subject: RE: Operation Dharmic Vote - receipt of notification CCM:0462743

Dear Mukesh,

As the deadline of 18 November 2019 has now passed. We will proceed with the assessment of the notification in its current form.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Partyreg
Sent: 15 November 2019 13:13
To: [redacted]
Cc: [redacted]
Subject: Operation Dharmic Vote - receipt of notification CCM:0462743

Dear Mukesh

Thank you for your notification to register as a non-party campaigner, which we received on 11 November 2019. **Operation Dharmic Vote** is not registered until we confirm this in writing.

We have conducted an initial check of the notification and have identified matters that require your attention. We will put your notification on hold until 18 November 2019 so that you can address the matters raised below.

Matters for consideration

It is your responsibility to determine the details of your notification and to ensure that it complies with the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA).

The following matters were identified on an initial check of your notification. You now have an opportunity to address them before the application is assessed in full.

Should the notification proceed to a full assessment against the PPERA requirements, further matters may be identified. Until a final decision is taken on your notification, we cannot confirm whether or not it will be successful.

Unless these issues are resolved, the notification may be refused

Relevant participators

The notification must include the relevant participators of the body. In this instance,

- where the body has more than 15 members and has officers or a governing body, those officers or the members of that governing body;
- Otherwise the body's members.

Could you please outline the body's members?

Secretary

Under the Political Parties, Elections and Referendums Act 2000 (PPERA), it is the secretary of an unincorporated association (or person who acts in a similar capacity) who must sign and submit the notification. Could you elaborate on your role in the organisation and why you are suitable to sign and submit the notification to the Commission?
If the notification is not signed by the secretary it must be signed by a person who acts in a similar capacity to a secretary in relation to the company.

Next steps

If you intend to amend your notification please do so as soon as possible and no later than 18 November 2019.

After that date we will review any amendments or additional information you provide to us. The Registration Team will check your notification to make sure that it meets the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA). The Director of Regulation will then take the final decision whether or not to approve your registration.

We aim to process a notification as quickly as possible after receipt of a complete and compliant notification.

You can find guidance in relation to registering a non-party campaigner, as well as the non-party campaigner spending rules for specific elections on our website.

Rules for non-party campaigners (NPCs)

If a non-party campaigner does not register, then it cannot spend more than £20,000 in England and £10,000 in Scotland, Wales and Northern Ireland on regulated campaign activity. The spending limits for registered non-party campaigners are set out in our guidance for non-party campaigners on our website.

A non-party campaigner cannot spend above the relevant threshold until it submits a registration notification to us that contains all of the information required by PPERA, and it should not spend above the threshold until we have confirmed its registration in writing. If you have already exceeded the registration threshold, you should not undertake any more regulated campaign spending until we have confirmed your registration in writing.

You can find the rules on imprints here.

Please note there are strict legal restrictions apply on the use of the electoral register accessed by a registered NPC. It can only be used by registered NPCs for electoral purposes and the control of donations.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

---------- Original Message ----------
From: Partyreg
Received: 01/11/2019 17:19
To: Parents Choice.UK; Richard Tracey
Subject: RE: ParentsChoice.UK - Receipt of notification CCM:0389257

Dear Richard Tracey,

We are currently considering your notification to register as a non-party campaigner.

To inform our assessment, we would be grateful if you could please answer the following questions:

1. What, if any, regulated campaign activity have you conducted (or intend to conduct) as an individual?
2. What, if any, regulated campaign activity has ParentsChoice.UK conducted (or intend to conduct) as an organisation?
3. What is the status of ParentsChoice.UK?
4. What is your association with, or role within, ParentsChoice.UK?

Please respond as soon as possible, if possible by Wednesday 6 November?

If you have any questions about this request then please get in touch.

Yours sincerely,

[redacted]

From: Partyreg
Sent: 30 October 2019 16:17
To: 'Richard TRACEY' [redacted]
Subject: RE: ParentsChoice.UK - Receipt of notification CCM:0389257

Dear Richard Tracey,

Thank you confirming this information. That is, that the name of the campaigner is “Richard Patrick Tracey” and not “ParentsCoice.UK” as originally indicated on the form.

We will continue to assess the information against the requirements of PPERA and let you know the outcome once we have made a decision.

If you have any further questions then please get in touch.

Yours sincerely,

[redacted]

From: Richard TRACEY [redacted]
Sent: 29 October 2019 14:50

To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: RE: ParentsChoice.UK - Receipt of notification CCM:0389257
Importance: High

Dear [redacted]

Thank you for your note below. I am sorry to have set out details incorrectly.

To answer the questions, I intend to campaign as an individual campaigner, so the information should register me as "**Richard Tracey**". The address I gave is correct and that is the address on the Electoral Register at which I am registered to vote. I hope this is complete information for your purposes. Please do come back to me if you require further information.

I look forward to hearing my registration is complete.

Good wishes

Richard Tracey

Sent from Mail for Windows 10

From: Partyreg <Partyreg@electoralcommission.org.uk>
Sent: Friday, October 25, 2019 5:14:02 PM
To: [redacted]
Subject: ParentsChoice.UK - Receipt of notification CCM:0389257

Dear Richard Tracey,

Thank you for your notification to register as a non-party campaigner (NPC), which we received on 24 October 2019. ParentsChoice.uk is not registered until we confirm this in writing.

We have conducted an initial check of the notification and have identified matters that require your attention. We will put your notification on hold until 1 November 2019 so that you can address the matters raised below.

Matters for consideration

It is your responsibility to determine the details of your notification and to ensure that it complies with the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA).

The following matters were identified on an initial check of your notification. You now have an opportunity to address them before the application is assessed in full.

Should the notification proceed to a full assessment against the PPERA requirements, further matters may be identified. Until a final decision is taken on your notification, we cannot confirm whether or not it will be successful.

Type of third party campaigner

Your notification indicates that you intend to register as an individual campaigner. However, the form also refers to "ParentsChoice.UK" as the name of the campaigner.

PPERA specifies that only certain types of individuals or organisations may register as NPCs. Depending on the type of individual or organisation you are/belong to will depend on the information you are required to provide to us.

Please confirm whether or not you intend to register as an individual campaigner as indicated on your form. If this is the case, please also confirm that [redacted] is your correct home address (and an address at which you are registered to vote in the UK). The name of the campaigner will be "Richard Patrick Tracey" and not "ParentsChoice.uk".

Alternatively, if you are intending to register an organisation then please let us know so that we can advise on the additional information you are required to provide. For instance, a company that intends to register is required to notify us of its registered company number, its registered address, as well as a list of its 'relevant participators' (i.e. its directors).

You can find guidance in relation to registering a NPC, as well as the NPC spending rules for specific elections on our website.

Next steps

Please address the matters raised above – i.e. to confirm the type of campaigner you intend to register as – **by 1 November 2019**. At present, we do not have enough information to process your notification. **If you do not respond then we will consider your notification closed.**

Should you provide the required information to us, then the Registration Team will check your notification to make sure that it meets the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA). The Director of Regulation will then take the final decision whether or not to approve your registration.

We aim to process a notification as quickly as possible after receipt of a complete and compliant notification.

Rules for NPCs

If a NPC does not register, then it cannot spend more than £20,000 in England and £10,000 in Scotland, Wales and Northern Ireland on regulated campaign activity. The spending limits for registered NPCs are set out in our guidance for NPCs on our website.

A NPC cannot spend above the relevant threshold until it submits a registration notification to us that contains all of the information required by PPERA, and it should not spend above the threshold until we have confirmed its registration in writing. If you have already exceeded the registration threshold, you should not undertake any more regulated campaign spending until we have confirmed your registration in writing.

You can find the rules on imprints here.

Please note there are strict legal restrictions apply on the use of the electoral register accessed by a registered NPC. It can only be used by registered NPCs for electoral purposes and the control of donations.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

---------- Original Message ----------
From: [redacted]
Received: 21/11/2019 12:38
To: [redacted]
Cc: [redacted]; Led By Donkeys; Led By Donkeys Ltd.; [redacted]; Oliver Knowles; [redacted]
Subject: RE: Private & Confidential: Led By Donkeys notes CCM:0237128

Hi [redacted] and everyone,

I'm really sorry, I've accidentally included some internal discussion and an earlier draft of our response in the chain below the actual response.

Please disregard everything below the actual response (where our answers are in blue).

Apologies,

[redacted]

From: [redacted]
Sent: 21 November 2019 12:18
To: [redacted]>
Cc: Led By Donkeys [redacted]>; [redacted]
Subject: RE: Private & Confidential: Led By Donkeys notes

Dear [redacted],

Thanks very much for this.

I've annotated your document in places, and answered you questions within the document too.

Please get back to us if you have any further questions.

Kind regards,

[redacted]

From: [redacted]
Sent: 14 November 2019 13:25
To: [redacted]
Cc: Led By Donkeys [redacted]>; [redacted]
Subject: Private & Confidential: Led By Donkeys notes

Dear [redacted]

Thanks so much for your time yesterday. We got a lot from the meeting! We have a few outstanding questions - but here below is our understanding of the meeting and what we discussed.

Please let us know if we have well understood all the points we discussed yesterday, we'd love to get your feedback.

very best wishes

[redacted]

Note for the attention of the Electoral Commission
Led By Donkeys

With many thanks for the meeting yesterday, Led By Donkeys wish to make sure we have understood all the different issues discussed. We would be grateful for the Electoral Commission's feedback on the points below.

1. **The new legal entity:** On 10 July 2019, Led By Donkeys incorporated as Led By Donkeys Ltd. The 'new' entity is now in the process of being registered with the Electoral Commission. The Led By Donkeys campaign will no longer exist, though the organisations will both be listed in parallel on the Electoral Commission website. We would like to confirm that, in the interests of transparency, and since had we not changed status in July we would have had to count our European election spend within the regulated period, **we will count the £18,298 we spent during the European election campaign towards our General Election regulated spend.**

   We have submitted the form online to the Electoral Commission to register Led By Donkeys Ltd as a non-party campaigner.

2. **Our spending limits:** We understand that this leaves us with a potential national spend of £566,519.07 (the £584,817.07 total spend minus the £18,298) but that this level of spend is only possible if the national limits and constituency limits have not been breached when all the spend is looked at as a whole (see point 9).

   The £584,817.07 figure assumes that all spending is national and split between all 650 constituencies equally. If you have done any spending which is not equal across all 650 constituencies, the total figure will be different. Your spending limits apply in each part of the United Kingdom and not as an overall total of these limits. You cannot exceed any limit in each part of the UK. These limits are:

   England £479,550

   Scotland £73,400

   Wales £55,259

Northern Ireland £37,550

If you wish to deduct the £18,298 amount from the EPEs from your UKPGE total, you should deduct this total as to how it attributes to each part of the UK and not the total sum.

As we said in the meeting, the £18,298 does not technically count towards the spending limits for Led By Donkeys Ltd. However, if you wanted to abide by the spirit of the rules as well as the letter, you might act as though it did count.

We understand that if we focus a part of the campaign spend (e.g. through social media such as Facebook advertising) on a group of seats across all four nations of the UK, the expenditure on the content will be divided between however many seats there are in the campaign but also taking into account the limits of the individual nations. We understand that for any single constituency in which more than £7800 is spent, a separate constituency report is needed.

3. **Our spending prior to 5 November 2019:** As discussed yesterday, none of our spending from 13 December 2018 to November 5 inclusive has been geared towards fighting a General Election campaign or asking people to vote a certain way, so we consider this as not counting towards the regulated spending limits. We have been through our back catalogue of content – the following images cover the range of content we have produced since the European elections and we think this clearly shows we have not had an election in mind.

https://twitter.com/ByDonkeys/status/1169235966365769732

https://twitter.com/ByDonkeys/status/1168223020936310785

https://twitter.com/ByDonkeys/status/1172072023272632320

4. As discussed yesterday however, the Electoral Commission requests that LBD Ltd submits accounts up to the period that LBD was still a UA (up to July 10). The electoral Commission would also like LBD to report how much expense has been incurred (even though unregulated spend) since incorporation on 10 July.

Not quite. You do not need to report any unregulated spending pre or post 10 July.

We requested that you report the regulated spending you incurred as a UA before 10 July, as a part of your spending return. This would be on a voluntary basis.

We also request that you submit accounts for the section of the regulated period before you incorporated – i.e. from 13 December 2018 to 10 July 2019. This would also be on a voluntary basis.

In the meeting you suggested that you would be happy with this approach. We are currently looking into some data protection issues relating to it. If it's ok with you we can return to this point with you nearer the time that you report your spending.

We were also interested in how much regulated spending you had incurred since becoming a company. You have told us that between incorporation and our meeting you have incurred no money on regulated activities.

5. **Confirming the £9750 limit is relevant for us, not the £700 RPA limit:** We are now crystal clear that the nature of our national campaign urging people to #GetJohnsonGone and #VoteTactically will mean we are subject to the £9750 constituency limits (as long as that spending comes within the UK-wide and national limits for the four nations). At this point we have no intention of running a separate campaign in an isolated constituency. We do intend to launch a national campaign. Where recommendations as to how to vote are made, if any, these will be for a clear and distinct group of seats following the clear logic of the national campaign: to #GetJohnsonOut.

    The targeted campaign rules do not apply to us as we will not be promoting one single political party or campaigning on behalf of any political party.

Targeted spending

We can confirm that from what you have said, the targeted spending rules will not apply, since you are not promoting a particular political party.

Local (£700 limit under RPA) vs general (PPERA) campaigning

Whether a campaign is a local or general campaign depends on the nature of the campaign. In most cases, your campaign, if regulated, will fall under one or the other. Spending on regulated activity will not count towards both at the same time.

Where a campaign is confined to one particular electoral area it is likely to fall under the local rules, particularly if it mentions particular candidates.

Where a campaign identifies particular candidates in more than one constituency and campaigns for or against them on the basis of an issue, it may not be clear to you whether this is a single campaign under the general rules, or a number of distinct campaigns under the local rules.

If the campaign is unified across the different constituencies – for example it carries the same messaging, or you use the same campaign material – then we will usually treat it as a single campaign under the general rules. From what you have said it sounds as if your campaign is of this type, and will fall entirely under the general campaign rules.

We would therefore only expect you to also account for spending under the local campaign rules if you engaged in separate activity that was distinct to your wider general campaign – for example if you were to run a number of separate distinct campaigns in separate constituencies concentrating more specifically on features of the particular candidates and less on the wider campaign.
The constituency limit of £9,750 is a part of the general rules.

6. **Content of our campaigns:** As discussed, the content of our campaign will follow the same style of Led By Donkeys Ltd work before, but with the clear call to action to #GetJohnsonGone and to vote tactically. The content we produce will be across the following 3 broad areas:

a. Embarrassing quotes of major politicians

b. A trade deal with the US

c. Explicit calls to GetJohnsonGone and Vote Tactically

The content of the campaigns may include some images used prior to the election being called, but the addition of the clear call to action to #GetJohnsonGone and Vote tactically renders this spend regulated as the content would be clearly be used to point people towards the election.

7. **Spending on stunts, projectors and billboards:** The style of campaigning involves spending up to five figure sums to deliver beach sculptures and drone and helicopter footage. However, as discussed, because we use the beach, billboard, or building as a canvas and we send the image out on social media afterwards which can be seen by the whole of the UK, and beyond, the content is in no way related to where it is rooted physically, and we can therefore confirm that all our billboard spend, our spending on stunts and projections will be counted as national campaign spend and divided between the 650 constituencies on the UK.

This is correct. Spending is only attributed to a single constituency if it has no significant effect outside of the constituency, and your social media campaign is clearly a significant effect.

8. **Facebook ads towards the end of the campaign:** As part of this unified campaign, we are likely to make voting recommendations towards the end of the campaign, which is another facet of the same campaign with the same goal of getting Johnson out. Under the terms of PPERA this would be part of the same general campaign.

The spending on this part of the campaign will be divided between the number of constituencies targeted. For example, if we spent £40,000 on 100 constituencies for this part of the campaign, we would assign £400 spending per constituency.
Follow up question for the electoral commission: would the spending definitely be divided between the group of seats spent (assuming no single seat expenditure goes over the £9750 limit) on ***or*** *would the amount spent in each constituency be logged as individual expenses? The guidance from you yesterday implied the former approach, but in previous elections actual spend per individual constituency has been counted.*

If the spending in each constituency is a different item of spending, then you can attribute the actual amount to each constituency. If the spending was all one item, then because of the way PPERA is worded, it must be split equally even if the spend was not in fact equal across all each constituency. If the spending was in different items, we would prefer to see it with the more accurate attributions.

9. **Purchasing of research:** We understand that if we purchase research relevant to a specific constituency to help with our targeting, that spend will come under the £9750 limit for each constituency. If this group of constituencies only cover e.g. 40 constituencies in England, then the total cost will also count towards the spending limit for England.

10. **Pre-polling reporting:** we understand from the new guidance that we only have to report on donations of £7500 and above in the weekly pre-polling reports. We need to take a note of donations of over £500 and make sure the donor is on the electoral register, but that information doesn't have to be part of the pre-poll reporting. We do have to either accept or reject the donation within 30 days.

    Follow up question: could you confirm this is correct please and also let us know if there is any possibility of accepting money during the campaign period destined for non-election regulated related spend?

    This is correct.
    The donations controls only apply to donations which are given for the purpose of meeting regulated spending. If you are given money with the express purpose that it be used for non-regulated spending after the election, then it would not fall under the donations controls.
    If this happens it would be good practice to keep clear records of where the money is and what it has been used for, and how you have ensured the money is not used to pay for regulated spending in the regulated period.

11. **Spending limits nationally, regionally and at the constituency level.**

    We understand that while there are clear limits for constituency level, regional and UK-wide spending, how the expenses interrelate is crucial. So any regulated national spend will have to be divided between all 650 constituencies, thus closing the gap on the upper limits of what can be spent at all three levels.

<table>
<tr><td rowspan="2">UK wide spending limit

£566,519.07</td><td rowspan="2">*

4 nation

limits cannot all be reached as added together they would breach the UK wide spending limit</td><td>England spending limit

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This is the overall limit to regulated spend for LDB Ltd during the forthcoming election period. However, crucially **within** this level of spending the limits at the level of the **four nations <u>and</u> constituency levels** cannot be breached	* ***All general UK-wide spend will be divided by 650 and allocated to each constituency's spending limits***	**Wales spending limit** **£55,259**	***nation's seats.*** * ***Buffers need to be in place within the constituency, nation and UK-wide budgets***	* ***40 seats*** *	**Constituency limit** **£9750**
		Northern Ireland spending limit **£37,550**		* ***18 seats*** *	**Constituency limit** **£9750**

The spending limit referred to in the first column would be for UK-wide spending where you had not incurred any non-UK-wide spending. That is the amount at which you would reach the spending limit in England (assuming your £18k you have already spent was all UK-wide spending). Even if you had reached that limit with UK-wide spending, you could spend more so long as you spent it without spending more in England – so it could not be UK-wide any more.
Similarly, you could spend up the 4 national limits, if you were doing separate campaigns in each part of the UK.
Since in reality your campaign will be mainly UK-wide spending with the potential for some extra ads targeted at specific constituencies, the actual end limit will fall somewhere in between these.

[redacted]

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[redacted]alcommission.org.uk>
[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

From: [redacted]
Sent: 14 November 2019 13:25
To: [redacted]
Cc: Led By Donkeys [redacted]; [redacted]
Subject: Private & Confidential: Led By Donkeys notes

Dear [redacted] and [redacted]

Thanks so much for your time yesterday. We got a lot from the meeting! We have a few outstanding questions - but here below is our understanding of the meeting and what we discussed.

Please let us know if we have well understood all the points we discussed yesterday, we'd love to get your feedback.

very best wishes

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Led By Donkeys

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   We have submitted the form online to the Electoral Commission to register Led By Donkeys Ltd as a non-party campaigner.

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   Not quite. We request you report regulated spending incurred as a UA pre 10 Jul. You do not need to report any unregulated spending pre or post 10 July.

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Similarly, you could spend up the 4 national limits, if you were doing separate campaigns in each part of the UK.
Since in reality your campaign will be mainly UK-wide spending with the potential for some extra ads targeted at specific constituencies, the actual end limit will fall somewhere in between these.

On 14 Nov 2019, at 09:35, [redacted] wrote:

Hi [redacted], [redacted] Olly and all,

Good to meet you yesterday, and glad to hear it was at least initially helpful.

Here is the link to the new guidance which talks about spending before the unscheduled election was announced:

https://www.electoralcommission.org.uk/non-party-campaigners-where-start/does-your-campaign-activity-meet-purpose-test/purpose-test-regulated-period-early-uk-parliamentary-general-election

This should help with your assessment of how much you've spent on regulated activity between 10 July 2019 and registering Led by Donkeys Ltd with us.

All the best,

[redacted]

From: [redacted]
Sent: 13 November 2019 15:50
To: [redacted]
Cc: Led By Donkeys [redacted]
Subject: Re: 12 December

Hi [redacted]

We've prepared this document with some key questions on to help our conversation today. See you shortly.

very best
[redacted]

On 13 Nov 2019, at 10:41, [redacted] wrote:

Morning all,

Can you please confirm who will coming in to the meeting today?

From our side we will have

[redacted]

Looking forward to meeting you at 16:30.

Best,

[redacted]

From: [redacted]
Sent: 12 November 2019 12:56
To: [redacted]
Cc: Led By Donkeys [redacted]
Subject: Re: 12 December

Dear [redacted]

That's great, I'll call you after 3pm.

Very best
[redacted]

Sent from my iPhone

On 12 Nov 2019, at 12:05, [redacted]> wrote:

Hi [redacted] and all,

Yes tomorrow 16:30 would be great.

[redacted] – I am free after 15:00 today if you'd like to arrange a call this afternoon?

[redacted]

From: Led By Donkeys [redacted]
Sent: 12 November 2019 11:38
To: [redacted]
Subject: Re: 12 December

Dear [redacted],

Thanks so much that's incredibly helpful. Can we go for 1630 tomorrow? If you have any last-minute cancellations ahead of that we'd appreciate it. I'm copying in [redacted] from our team too who'd love to give you a call ahead of that meeting to make sure we're well prepared.

Thanks again,

[redacted]

On Tue, 12 Nov 2019 at 11:27, S[redacted]> wrote:
Dear [redacted], [redacted], [redacted] and [redacted]

Thank you for getting in touch.

We were very sorry to hear about [redacted]'s illness, and wish her a speedy recovery. My colleague [redacted] is coordinating a response to [redacted]'s most recent email of questions, and we aim to get the response to you today.

We're very happy to have you in for a meeting at our offices at 3 Bunhill Row, EC1Y 8YZ.

Looking at rooms this week, could you do:

Wed 13 16:30-17:30

Thu 14 12:00-13:00
13:00-14:00

Fri 15 12:00-13:00
13:00-14:00
14:00-15:00

Otherwise we can arrange something next week.

Kind regards,

[redacted]

[redacted]

[redacted]

The Electoral Commission
[redacted]

electoralcommission.org.uk

From: Led By Donkeys <[redacted]>
Sent: 11 November 2019 16:21
To: PEF Inbox <pef@electoralcommission.org.uk>
Subject: 12 December

Dear Electoral Commission,

We are Led By Donkeys and we are keen to comply with all EC regulation. We would welcome a meeting in person at your convenience this week.

As a group that is likely to be spending near to the limit of what is legally allowed, we are keen to make sure we fully understand all the regulations and compliance requirements, particularly in view of the first wave of reporting coming up later in November. We will ask you about the following in the meeting:

1. Checking our understanding of the £700 spending limits and the larger limits per constituency and how the lobbying act overlays with electoral law.

2. How to avoid problems with a mobile banner touring across different constituencies as regards the overlap between national and local spending

3. Checking our first draft report on spending since last December, and checking that we can legitimately not claim any spend prior to the calling of the election as electoral spend since a General Election was not planned for December 2019 (except for our spending during the European elections).

We had made some headway in these questions and we have legal advice. However our colleague who was looking after this for us was taken ill so we are keen to make sure we are fully up to speed on all the rules we need to be.

Please let us know when we can meet at your earliest convenience

Very best wishes

[redacted] [redacted] and [redacted]

---------- Original Message ----------
From: Operation Dharmic Vote
Received: 06/12/2019 11:54
To: [redacted]
Subject: Re: RE: Re Urgent - Access to Electoral Registers - Operations Dharmic Vote CCM:0336942

Dear [redacted],

Many thanks for the reply and feedback.

So far only Nottingham has responded with a form which I have filled in, signed and return a scanned copy.

Appreciate this is a busy period for the Electoral Officers but is there a guide or legal duty within which time frame they need to supply the electronic copies by.

Kind regards

Mukesh

---- On 05/12/2019 05:17 PM <[redacted]> wrote ----

---- 05/12/2019 05:17 PM [redacted] wrote ----

Dear Mukesh,

I can confirm that registered non-party campaigners (NPC) are entitled to a copy of the electoral register for electoral purposes. Therefore, as a registered NPC, the responsible person is entitled to request, in writing, a copy of the relevant registers. Your registration details can be found here on our website. This is set out in under regulation 106 of the Representation of the People Regulations 2001 (as amended).

NPC's must only accept donations from certain permissible sources, for example, individuals on the electoral register. Therefore, registered NPC's are entitled to access this information so that they can carry out the required permissibility checks.

I hope this information has been helpful, please let me know if you have further queries on this matter or if you have had issues with any specific local authorities.

Kind regards,

[redacted]

[redacted]

The Electoral Commission
020 7271 [redacted]

electoralcommission.org.uk

From: Mukesh Naker [redacted]
Sent: 05 December 2019 16:46
To: [redacted]
Subject: Re Urgent - Access to Electoral Registers - Operations Dharmic Vote

Dear [redacted],
Re Urgent - Access to Electoral Registers - Operations Dharmic Vote

I have sent requests to various Election Officers for electronic copies of their electoral registers with follow up phone calls and getting nowhere.

Please suggest what we can do to have access to these?

Pranaam
Mukesh Naker
Operations Dharmic Vote
[redacted]

---------- Original Message ----------
From: [redacted]
Received: 27/11/2019 15:22
To: [redacted] Partyreg
Subject: RE: re[2]: URGENT!

Thanks [redacted]. Decision to register now made – I've added it to the assessment.
Ta,
[redacted]
From: Partyreg
Sent: 27 November 2019 11:18
To: [redacted]
Subject: FW: re[2]: URGENT!
Hi [redacted],
Please see the response from Operation Dharmic Vote.
Thanks,
[redacted]
From: Mukesh Naker [redacted]
Sent: 26 November 2019 18:13
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: re[2]: URGENT!

Dear [redacted]
That is how ODV did it in GE2015 & GE2017. But for GE2019, we have set up Operation Dharmic Vote as a separate an unincorporated association. The members are as per the names we have supplied inour application. A new web domain has also been registered and is in the process of being hosted. All ODV content will be transfered & hosted separately. Hope that clarifies the situation.
Kind regards
Mukesh

---------- **Original Message** ----------
From: "Partyreg"
To: "'Mukesh Naker'" , "'Bharat Rana'"
Cc:
Date: Tue, 26 Nov 2019 17:12:01 +0000
Subject: **RE: URGENT!**
Dear Mukesh,
Could you please outline the structure of the organisation?
From your website it appears that DSP is the UA and Operation Dharmic Vote is the campaign. Could you please confirm if this is correct?
Yours sincerely,
[redacted]
[redacted]
The Electoral Commission
electoralcommission.org.uk
From: Partyreg
Sent: 25 November 2019 12:03
To: 'Mukesh Naker' [redacted]; Bharat Rana [redacted]

Cc: [redacted]
Subject: URGENT!

Dear all,
The application has not been properly submitted. It is currently in a status which is 'sanctioned'. Please submit the application ASAP.
We cannot move forward with the assessment unless this is done.
Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Mukesh Naker [redacted]
Sent: 22 November 2019 18:59
To: Partyreg <Partyreg@electoralcommission.org.uk>; Partyreg <Partyreg@electoralcommission.org.uk>; Bharat Rana [redacted]
Cc: [redacted]
Subject: re[2]: Operation Dharmic Vote - receipt of notification CCM:0462743

Dear [redacted]
Many thanks for calling back this afternoon. As requested, Bharat has approved and submitted the application.
What happens next?
Kind regards
Mukesh.

---------- **Original Message** ----------
From: ""
To: Partyreg , "Bharat Rana"
Cc: [redacted]
Date: Fri, 22 Nov 2019 15:35:02 +0000 (GMT)
Subject: **RE: Operation Dharmic Vote - receipt of notification CCM:0462743**

[redacted],
Apologies, been out of the office and just saw this. We have added Bharat as requested and re-submit the application.
Not sure if this was mentioned earlier if so we seem to have missed it.
Any other issues, please call me on [redacted].
Kind regards
Mukesh
On 22 November 2019 at 10:45 Partyreg <Partyreg@electoralcommission.org.uk> wrote:

Dear Mukesh,

As Bharat is also a member of the association, Bharat will also need to be added to the list of relevant participators.

Please do this no later than 1pm.

Thanks,

[redacted]

From: Bharat Rana [redacted]
Sent: 21 November 2019 18:05
To: Partyreg <Partyreg@electoralcommission.org.uk>
Cc: [redacted]
Subject: Re: Operation Dharmic Vote - receipt of notification CCM:0462743

hello there,

i have just done this.

Bharat

[redacted]

On Thu, 21 Nov 2019 at 14:35, Partyreg <Partyreg@electoralcommission.org.uk> wrote:

Hi Mukesh,

Bharat will need to logon to the system and submit the application.

Please do this as soon as possible

Yours sincerely,

[redacted]

[redacted]

The Electoral Commission

electoralcommission.org.uk

From: [redacted]
Sent: 21 November 2019 11:50
To: Partyreg <Partyreg@electoralcommission.org.uk>
Cc: [redacted]
Subject: Re: Operation Dharmic Vote - receipt of notification CCM:0462743

Dear [redacted]

As per our phone conversation this morning, the role of the secretary is jointly undertaken by Bharat and myself as both of us are volunteers with other full time jobs in this project with ODV. And the intensity of this election means we need to respond to issues and detail as promptly as possible.

Both of us take the duties and responsibilities of a Secretary seriously and will at all times work to fulfil our responsibilities and obligations as fully as we can.

Please do not hesitate to ask for any further clarifications.

Kind regards

Mukesh Naker

On 15 November 2019 at 13:13 Partyreg <Partyreg@electoralcommission.org.uk> wrote:

Dear Mukesh

Thank you for your notification to register as a non-party campaigner, which we received on 11 November 2019. **Operation Dharmic Vote** is not registered until we confirm this in writing.

We have conducted an initial check of the notification and have identified matters that require your attention. We will put your notification on hold until 18 November 2019 so that you can address the matters raised below.

Matters for consideration

It is your responsibility to determine the details of your notification and to ensure that it complies with the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA).

The following matters were identified on an initial check of your notification. You now have an opportunity to address them before the application is assessed in full.

Should the notification proceed to a full assessment against the PPERA requirements, further matters may be identified. Until a final decision is taken on your notification, we cannot confirm whether or not it will be successful.

Unless these issues are resolved, the notification may be refused

Relevant participators

The notification must include the relevant participators of the body. In this instance,

- where the body has more than 15 members and has officers or a governing body, those officers or the members of that governing body;

- Otherwise the body's members.

Could you please outline the body's members?

Secretary

Under the Political Parties, Elections and Referendums Act 2000 (PPERA), it is the secretary of an unincorporated association (or person who acts in a similar capacity) who must sign and submit the notification. Could you elaborate on your role in the organisation and why you are suitable to sign and submit the notification to the Commission?

If the notification is not signed by the secretary it must be signed by a person who acts in a similar capacity to a secretary in relation to the company.

Next steps

If you intend to amend your notification please do so as soon as possible and no later than 18 November 2019.

After that date we will review any amendments or additional information you provide to us. The Registration Team will check your notification to make sure that it meets the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA). The Director of Regulation will then take the final decision whether or not to approve your registration.

We aim to process a notification as quickly as possible after receipt of a complete and compliant notification.

You can find guidance in relation to registering a non-party campaigner, as well as the non-party campaigner spending rules for specific elections on our website.

Rules for non-party campaigners (NPCs)

If a non-party campaigner does not register, then it cannot spend more than £20,000 in England and £10,000 in Scotland, Wales and Northern Ireland on regulated campaign activity. The spending limits for registered non-party campaigners are set out in our guidance for non-party campaigners on our website.

A non-party campaigner cannot spend above the relevant threshold until it submits a registration notification to us that contains all of the information required by PPERA, and it should not spend above the threshold until we have confirmed its registration in writing. If you have already exceeded the registration threshold, you should not undertake any more regulated campaign spending until we have confirmed your registration in writing.

You can find the rules on imprints here.

Please note there are strict legal restrictions apply on the use of the electoral register accessed by a registered NPC. It can only be used by registered NPCs for electoral purposes and the control of donations.

Yours sincerely,

[redacted]

[redacted]

The Electoral Commission

electoralcommission.org.uk

---------- Original Message ----------
From: Partyreg
Received: 26/11/2019 13:09
To: Parents Choice.UK; Richard Patrick Tracey; Richard Patrick Tracey - campaign name Parent's Choice; Richard Tracey
Subject: RE: Richard Patrick Tracey – Registration confirmation CCM:0389269

Dear Richard,

Apologies for the error in my email of 11 November – your correct registration date is 29 October 2019 and not 29 November.

If you have any further questions then please get in touch.

Yours sincerely,

[redacted]

From: Partyreg
Sent: 11 November 2019 10:34
To: [redacted]
Subject: Richard Patrick Tracey – Registration confirmation CCM:0389269

Dear Richard,

Registration of Richard Patrick Tracey
I write to inform you that we have processed your notification to register you as a non-party campaigner which was submitted on 24 October 2019 and considered complete and compliant on 29 October 2019. You are now registered as a non-party campaigner – your registration is in effect as of 29 ~~November~~ October 2019.

Your entry on the register is:
http://search.electoralcommission.org.uk/English/Registrations/TP10345
(please allow a day for the entry to appear on the register)

Contact us immediately if any of the details outlined below or in the campaigner's entry on the register are incorrect or are not what the campaigner intended.

Your non-party campaigner has been allocated the following unique reference [redacted], which should be quoted on all communications and returns sent to us. The reference offers a safeguard so that we can be certain that any correspondence, returns etc received in your non-party campaigner's name are genuine. It is therefore in your own interest to ensure that only those officers who need to communicate with us have access to the reference.

A registered non-party campaigner must comply with the controls and responsibilities set out in the Political Parties, Elections and Referendums Act 2000 (PPERA), particularly in relation to spending on regulated campaign activity. **We urge strongly that you familiarise yourself with our guidance for non-party campaigners.**

Specific guidance on the rules relating to the 2019 UK general election can be found here.

Failure to comply with the obligations may be a criminal offence which can attract prosecution or civil sanctions, including a fine. You can find our enforcement policy here.

Non-party campaigner contact details

We confirm the following details for your non-party campaigner registration.

The campaigner's address and the names of the campaigner's responsible person and secretary **will appear on the register**. Other details, including all email addresses and telephone numbers, will not appear on the register. The address provided for a campaigner registered as an individual will also not appear on the register.

	Post/Home address	Email	Telephone
Responsible person: Richard Patrick Tracey	[redacted]	[redacted]	[redacted]

If your registered details change, you should notify us as soon as possible as this may affect who has responsibility for the campaigner's compliance with PPERA. It will also enable us to ensure that any reminders and information are sent to the correct person at the right address.

Non-party campaigner renewal deadline

In order to remain registered, a non-party campaigner is required to submit a notification of renewal each year. This must be delivered within a period beginning one month before and ending three months after the original notification to register was provided to us (unless the end of that period falls within a regulated period, under which circumstances different rules will apply).

This means that the first renewal notification can be delivered between 29 September 2020 and 29 January 2021. We urge strongly that you set yourself a reminder to do this each year. If we do not receive a complete and compliant notification by the deadline we are required by law to remove the campaigner from the register.

This can be completed either online or by completing and returning a TP3 form to us.

Electoral register

Strict legal restrictions apply on the use of the electoral register accessed by a registered non-party campaigner. It can only be used by registered non-party campaigners for electoral purposes and the control of donations. Any person found breaching the restrictions on the use of the electoral register could face an unlimited fine in England and Wales or a fine of up to £5,000 in Scotland.

Please contact us if you have any further questions.

Yours sincerely,

[redacted]
[redacted]

The Electoral Commission
electoralcommission.org.uk

---------- Original Message ----------
From: [redacted]
Received: 22/11/2019 17:47
To: Alex Crowley; Alex Crowley
Subject: RE: Spending query REF: [redacted] CCM:0336909

Dear Alex,

Thank you for your email to the Commission.

To count as targeted spending, your spending must reasonably be regarded as intending to influence voters to vote for only one political party or any of its candidates (and not intended to influence voters to vote for any other party or any of its candidates). In almost all cases, your spending on regulated campaign activity will only count as targeted spending if you name a political party or its candidates in a way that can be regarded as intended to influence voters to vote for only that political party.

NPC's that campaign against certain parties without influencing voters to vote for a specific party, are likely to be covered by the general NPC spending rules and limits.

Please note, NPC's must not spend more than £9,750 in any particular constituency. If you would like further information on this point, please do let me know.

Kind regards,

[redacted]

[redacted]
[redacted]

From: Alex Crowley [redacted]
Sent: 22 November 2019 16:05
To: PEF Inbox <pef@electoralcommission.org.uk>
Subject: Spending query REF: [redacted]

Hi,

I have a question about what your guidance describes as the 'targeted spending' limit as it applies to registered third party campaigns. I want to make sure I have properly understand what my campaign can and cannot do, so we are following the law at all times.

I have read the guidance document, but I would grateful if you could provide some illustrative examples of what counts as influencing voters to support one particularly party or candidate. For example, I can see that naming a party or candidate and explicitly urging voters to vote for them might count. But what about campaigns that urge campaigns not to vote for a particular party or candidate (whilst remaining silent on who they should vote for instead)?

The guidance appears to be unclear on this.

Could you also tell me what the legislative basis is for such a 'targeted spending' limit, as it applies to registered third parties?

Many thanks,
--
Alex Crowley on behalf of the Fair Tax Campaign

---------- Original Message ----------
From: PEF Inbox
Received: 26/11/2019 15:48
To: Alex Crowley; Alex Crowley
Subject: RE: Submitting a nil pre-poll return

Dear Alex

Thank you for your email.

Regarding donations, there is no requirement for a non-party campaigner to submit a nil donations return. You only need to submit a donations return if you receive a reportable donation during a particular reporting period. If you do not receive a reportable donation, you do not need to submit a donations return.

There is no requirement for non-party campaigners to submit pre-poll transactions returns. Although you may see that PEF Online automatically generates pre-poll transactions returns for you, you do not need to submit any pre-poll transactions returns.

I hope this clarifies matters.

Best regards

[redacted]

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Alex Crowley [redacted]
Sent: 26 November 2019 15:37
To: PEF Inbox <pef@electoralcommission.org.uk>
Subject: Submitting a nil pre-poll return

Hi,

I have submitted a nil return for transactions for the pre-poll period 13th Nov - 19th Nov today. When I've tried to do the same for donations, the portal doesn't offer me the option of submitting a nil return, see the screen shot below:



Can you advise how I can submit a nil return for donations so I can meet today's deadline please?

Many thanks,

--
Alex Crowley

---------- Original Message ----------
From: Mukesh Naker
Received: 25/11/2019 12:54
To: Bharat Rana; [redacted] Partyreg
Cc: Mukesh Naker; Operation Dharmic Vote
Subject: re: URGENT!

[redacted]

Many thanks for your note below. I called in spoke with [redacted] who helped through the submission and and confirmed EC now has it and you will get to us if there is anything else.
Kind regards
Mukesh

---------- **Original Message** ----------
From: "Partyreg"
To: "'Mukesh Naker'" , "Bharat Rana"
Cc: "[redacted]"
Date: Mon, 25 Nov 2019 12:03:18 +0000
Subject: **URGENT!**
Dear all,
The application has not been properly submitted. It is currently in a status which is 'sanctioned'. Please submit the application ASAP.
We cannot move forward with the assessment unless this is done.
Yours sincerely,

[redacted]

[redacted]

The Electoral Commission
electoralcommission.org.uk
From: Mukesh Naker
Sent: 22 November 2019 18:59
To: Partyreg ; Partyreg ; Bharat Rana
Cc: [redacted]
Subject: re[2]: Operation Dharmic Vote - receipt of notification CCM:0462743

Dear [redacted]
Many thanks for calling back this afternoon. As requested, Bharat has approved and submitted the application.
What happens next?
Kind regards
Mukesh.

---------- **Original Message** ----------
From: ""
To: Partyreg , "Bharat Rana"
Cc: [redacted]
Date: Fri, 22 Nov 2019 15:35:02 +0000 (GMT)
Subject: **RE: Operation Dharmic Vote - receipt of notification CCM:0462743**

[redacted],
Apologies, been out of the office and just saw this. We have added Bharat as requested and re-submit the application.

Not sure if this was mentioned earlier if so we seem to have missed it.
Any other issues, please call me on [redacted].
Kind regards
Mukesh
On 22 November 2019 at 10:45 Partyreg <Partyreg@electoralcommission.org.uk> wrote:

Dear Mukesh,

As Bharat is also a member of the association, Bharat will also need to be added to the list of relevant participators.

Please do this no later than 1pm.

Thanks,

[redacted]

From: Bharat Rana <[redacted]>
Sent: 21 November 2019 18:05
To: Partyreg <Partyreg@electoralcommission.org.uk>
Cc: [redacted]
Subject: Re: Operation Dharmic Vote - receipt of notification CCM:0462743

hello there,

i have just done this.

Bharat

[redacted]

On Thu, 21 Nov 2019 at 14:35, Partyreg <Partyreg@electoralcommission.org.uk> wrote:

Hi Mukesh,

Bharat will need to logon to the system and submit the application.

Please do this as soon as possible

Yours sincerely,

[redacted]

[redacted]

The Electoral Commission

electoralcommission.org.uk

From: [redacted]
Sent: 21 November 2019 11:50
To: Partyreg <Partyreg@electoralcommission.org.uk>
Cc: [redacted]
Subject: Re: Operation Dharmic Vote - receipt of notification CCM:0462743

Dear [redacted]

As per our phone conversation this morning, the role of the secretary is jointly undertaken by Bharat and myself as both of us are volunteers with other full time jobs in this project with ODV. And the intensity of this election means we need to respond to issues and detail as promptly as possible.

Both of us take the duties and responsibilities of a Secretary seriously and will at all times work to fulfil our responsibilities and obligations as fully as we can.

Please do not hesitate to ask for any further clarifications.

Kind regards

Mukesh Naker

On 15 November 2019 at 13:13 Partyreg <Partyreg@electoralcommission.org.uk> wrote:

Dear Mukesh

Thank you for your notification to register as a non-party campaigner, which we received on 11 November 2019. **Operation Dharmic Vote** is not registered until we confirm this in writing.

We have conducted an initial check of the notification and have identified matters that require your attention. We will put your notification on hold until 18 November 2019 so that you can address the matters raised below.

Matters for consideration

It is your responsibility to determine the details of your notification and to ensure that it complies with the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA).

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Unless these issues are resolved, the notification may be refused

Relevant participators

The notification must include the relevant participators of the body. In this instance,

- where the body has more than 15 members and has officers or a governing body, those officers or the members of that governing body;

- Otherwise the body's members.

Could you please outline the body's members?

Secretary

Under the Political Parties, Elections and Referendums Act 2000 (PPERA), it is the secretary of an unincorporated association (or person who acts in a similar capacity) who must sign and submit the notification. Could you elaborate on your role in the organisation and why you are suitable to sign and submit the notification to the Commission?

If the notification is not signed by the secretary it must be signed by a person who acts in a similar capacity to a secretary in relation to the company.

Next steps

If you intend to amend your notification please do so as soon as possible and no later than 18 November 2019.

After that date we will review any amendments or additional information you provide to us. The Registration Team will check your notification to make sure that it meets the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA). The Director of Regulation will then take the final decision whether or not to approve your registration.

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You can find guidance in relation to registering a non-party campaigner, as well as the non-party campaigner spending rules for specific elections on our website.

Rules for non-party campaigners (NPCs)

If a non-party campaigner does not register, then it cannot spend more than £20,000 in England and £10,000 in Scotland, Wales and Northern Ireland on regulated campaign activity. The spending limits for registered non-party campaigners are set out in our guidance for non-party campaigners on our website.

A non-party campaigner cannot spend above the relevant threshold until it submits a registration notification to us that contains all of the information required by PPERA, and it should not spend above the threshold until we have confirmed its registration in writing. If you have already exceeded the registration threshold, you should not undertake any more regulated campaign spending until we have confirmed your registration in writing.

You can find the rules on imprints here.

Please note there are strict legal restrictions apply on the use of the electoral register accessed by a registered NPC. It can only be used by registered NPCs for electoral purposes and the control of donations.

Yours sincerely,

[redacted]

[redacted]

The Electoral Commission

electoralcommission.org.uk

---------- Original Message ----------
From: Mukesh Naker
Received: 22/11/2019 18:58
To: Bharat Rana; [redacted] Partyreg
Cc: Mukesh Naker; Operation Dharmic Vote
Subject: re[2]: Operation Dharmic Vote - receipt of notification CCM:0462743

Dear [redacted]
Many thanks for calling back this afternoon. As requested, Bharat has approved and submitted the application.
What happens next?
Kind regards
Mukesh.

---------- **Original Message** ----------
From: ""
To: Partyreg , "Bharat Rana"
Cc: [redacted]
Date: Fri, 22 Nov 2019 15:35:02 +0000 (GMT)
Subject: **RE: Operation Dharmic Vote - receipt of notification CCM:0462743**
[redacted],

Apologies, been out of the office and just saw this. We have added Bharat as requested and re-submit the application.

Not sure if this was mentioned earlier if so we seem to have missed it.

Any other issues, please call me on [redacted].

Kind regards

Mukesh
On 22 November 2019 at 10:45 Partyreg wrote:

Dear Mukesh,

As Bharat is also a member of the association, Bharat will also need to be added to the list of relevant participators.

Please do this no later than 1pm.

Thanks,

[redacted]

From: Bharat Rana
Sent: 21 November 2019 18:05
To: Partyreg
Cc: [redacted]
Subject: Re: Operation Dharmic Vote - receipt of notification CCM:0462743

hello there,

i have just done this.

Bharat

[redacted]

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Hi Mukesh,

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Please do this as soon as possible

Yours sincerely,

[redacted]

[redacted]

The Electoral Commission

electoralcommission.org.uk

From: [redacted]
Sent: 21 November 2019 11:50
To: Partyreg <Partyreg@electoralcommission.org.uk>
Cc: [redacted]
Subject: Re: Operation Dharmic Vote - receipt of notification CCM:0462743

Dear [redacted]

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Kind regards

Mukesh Naker

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Dear Mukesh

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We have conducted an initial check of the notification and have identified matters that require your attention. We will put your notification on hold until 18 November 2019 so that you can address the matters raised below.

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It is your responsibility to determine the details of your notification and to ensure that it complies with the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA).

The following matters were identified on an initial check of your notification. You now have an opportunity to address them before the application is assessed in full.

Should the notification proceed to a full assessment against the PPERA requirements, further matters may be identified. Until a final decision is taken on your notification, we cannot confirm whether or not it will be successful.

Unless these issues are resolved, the notification may be refused

Relevant participators

The notification must include the relevant participators of the body. In this instance,

- where the body has more than 15 members and has officers or a governing body, those officers or the members of that governing body;
- Otherwise the body's members.

Could you please outline the body's members?

Secretary

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Next steps

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After that date we will review any amendments or additional information you provide to us. The Registration Team will check your notification to make sure that it meets the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA). The Director of Regulation will then take the final decision whether or not to approve your registration.

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A non-party campaigner cannot spend above the relevant threshold until it submits a registration notification to us that contains all of the information required by PPERA, and it should not spend above the threshold until we have confirmed its registration in writing. If you have already exceeded the registration threshold, you should not undertake any more regulated campaign spending until we have confirmed your registration in writing.

You can find the rules on imprints here.

Please note there are strict legal restrictions apply on the use of the electoral register accessed by a registered NPC. It can only be used by registered NPCs for electoral purposes and the control of donations.

Yours sincerely,

[redacted]

[redacted]

The Electoral Commission

electoralcommission.org.uk

---------- Original Message ----------
From: Partyreg
Received: 05/12/2019 12:36
To: Campaign Against Corbynism
Cc: James Bickerton
Subject: Registration of Campaign Against Corbynism CCM:0462781

Dear James,

Registration of Campaign Against Corbynism
I write to inform you that we have processed and approved your notification to register **Campaign Against Corbynism** as a non-party campaigner which was submitted on 02 December 2019 and considered complete on 02 December 2019. Your registration is in effect from 02 December 2019.

You have been allocated reference [redacted], which should be quoted on all communications and returns sent to us. The reference is a safeguard so that we can be certain that any correspondence, returns etc. received in your NPC's name are genuine. We advise you no to publicise this number.

Non-party campaigner (NPC) contact details
We confirm the following details for your non-party campaigner registration. Please contact us if any of these details are incorrect or change.

The NPC's address, name, the names of the responsible person and secretary, and relevant participators will appear on the register. Other details such as addresses of individuals will not appear on the register.

Your entry on the register is:
http://search.electoralcommission.org.uk/English/Registrations/TP10334
(please allow a day for the entry to appear on the register)

	Post/Home address	Email	Telephone
Campaigner Headquarters	[redacted]	[redacted]	[redacted]
Responsible person: James Bickerton	[redacted]	[redacted]	[redacted]

Secretary: [James Bickerton	[redacted]	[redacted]	[redacted]
Names of relevant participators:	• James Bickerton • [redacted] • [redacted]		

Guidance

You can find our general guidance for NPCs here and our guidance for the 2019 elections here. Below we have highlighted some specific guidance. If you have any questions about spending or reporting, please contact pef@electoralcommission.org.uk

General campaign spending

The spending limits for registered NPCs are:

England - £479,550

Scotland - £73,400

Wales - £55,259

Northern Ireland - £37, 550

NPCs must not spend more than £9,750 per constituency. You can find our guidance about focussed constituency spending here.

However, please note that depending on how your spending is attributed, your spending limits may differ to those noted above. Further information on the attribution rules can be found on p12 of our guidance.

Targeted Spending

Targeted Spending is regulated campaign activity that can reasonably be regarded as intended to influence voters to vote for one particular registered party or any of its candidates. You can find our guidance for targeted spending here.

If the party you are campaigning for authorises you to incur an amount of targeted campaign spending, you may spend up to any limit (or 'cap') authorised by that party. However, you must not exceed the general spending limits.

If you are not authorised by the party, you must not spend more than the following limits on targeted spending:

England - £31,980
Scotland - £3,540
Wales - £2,400
Northern Ireland - £1,080

The constituency spending limits also still apply.

Local campaign spending
NPCs can spend up to £700 campaigning for certain candidates. You must be authorised by the candidate to exceed this limit. Any excess must be reported by the candidate and will be count towards their limit. You will also be required to submit a spending return to the local authority detailing spending related to the candidate's campaign.

Although we can provide advice about local campaigning, we do not regulated these rules – Breaches of these rules are dealt with by the police.

Donations
Registered NPCs must only accept donations, with a value of over £500, from certain permissible sources. You can find our guidance about donations here.
Permissible sources are:

- Most UK registered companies
- An individual registered on a UK electoral register, including overseas electors and those leaving bequests.
- UK registered trade union.
- UK registered building society.
- UK registered LLPs that carry on business in the UK.
- UK registered friendly society.
- UK based unincorporated association that carries on business or other activities in the UK.

Registered NPCs cannot accept donations from registered parties.

Reporting
Post-election, NPCs are required to report details of all spending incurred (or used) within the 12 month regulated period and all donations received in line with their campaign activity. The return must be accompanied by invoices for all payments with a value of over £200. You can find more information about this here.

Values for each of the following types of expenditure must be included in the return:

- Notional spending
- Unpaid claims
- Disputed Claims

The return must be submitted within 3 months of the election or within 6 months of the election if total spending is over £250,000. The later must also submit an independent auditors report.

Pre-poll reporting

NPCs must report certain donations to us on a regular basis before the poll. You can find our pre-poll reporting guidance here. You can make the reports via PEF Online or using the TP6 (ii) form.

You must record and report all donations you receive from a single source that add up to over £7,500. Money, goods property or services from a single source over £500 are considered donations.

Below I have set out the reporting periods for this election:

- 6 Nov-12 Nov: deadline 19 Nov.
- 13 Nov – 19 Nov: deadline 26 Nov.
- 20 Nov – 26 Nov: deadline 3 Dec.
- 27 Nov – 3 Dec: deadline 10 Dec.
- 4 Dec – 10 Dec: deadline 17 Dec.
- 11Dec – 12 Dec: deadline 19 Dec.

Enforcement

Failure to comply with the obligations may be a criminal offence which can attract prosecution or civil sanctions, including a fine. You can find our enforcement policy here.

NPC renewal deadline

To remain registered you must submit renewal each year. This must be delivered between one month before and up to three months after, the anniversary of when the original notification was provided to us.

Your renewal deadline is 02 March 2021 You should set a reminder for this deadline if you intend to renew your registration. If your NPC is not renewed, it will be removed from the register. This can be completed either online or by using a TP3 form.

Electoral register

Legal restrictions apply on the use of the electoral register accessed by NPCs. It can only be used for electoral purposes and the control of donations. Breaching the restrictions on the use of the electoral register can result in an unlimited fine in England and Wales or a fine of up to £5,000 in Scotland.

Please contact us if you have any further questions.

Yours sincerely

[redacted]

The Electoral Commission
electoralcommission.org.uk

---------- Original Message ----------
From: Partyreg
Received: 22/11/2019 13:09
To: Parents Choice.UK; Richard Patrick Tracey; Richard Patrick Tracey - campaign name Parent's Choice; Richard Tracey
Subject: Richard Patrick Tracey - campaign name CCM:0389291

Dear Richard Tracey,

I am writing with regards to your registration as a non-party campaigner.

You are registered with us as an individual under your own name.

We note that you ordinarily campaign, however, under the name “Parent's Choice”.

So that the information on our public register is as transparent as possible, we intend to amend slightly the details contained in it. This involves adding the following details to your registered entry:

Richard Patrick Tracey (campaign name: Parent's Choice)

We intend to implement this change at the end of today at 5pm. Please let us know before then if you have any questions or concerns about this approach.

Yours sincerely,

[redacted]

The Electoral Commission
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