[redacted]

From: FOI
Sent: 01 June 2021 15:34
To: [redacted]
Subject: FOI 063-21 - Response

Dear [redacted],

Our Ref: FOI-063-21

Thank you for your email to the Electoral Commission dated 6 May 2021.

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

Your request is shown below followed by our response.

A copy of the correspondence received by the Electoral Commission between 1 January 2020 and 06/05/2021 from the Conservative Party to notify the Electoral Commission of any donations by Lord Brownlow of Shurlock Row.

Please note I am requesting a copy of the documents which should show details including but not limited to the sender, the recipient, the date and the message, along with any supporting documentation.A copy of any replies sent in relation to any of the correspondence in Q1 above also.

If you need to redact information please tell me what and why and please don't include the time involved in redacting in any calculation about the cost of fulfilling the request.

Our response is as follows:

We hold some of the information you have requested.

Between 1 January 2020 and 6 May 2021 Lord Brownlow made a number of donations to the Conservative and Unionist Party, specifically to the Maidenhead and Southport local parties.

This information is exempt from disclosure under section 21 of the Freedom of Information Act 2000. Section 21 provides for an exemption where the information requested is reasonably accessible to you by other means. You can view the details of these donations here on our website (we have applied a search using the name ‘Brownlow’ for you: http://search.electoralcommission.org.uk/?currentPage=1&rows=10&query=brownlow&sort=AcceptedDate&order=desc&tab=1&et=pp&et=ppm&et=tp&et=perpar&et=rd&isIrishSourceYes=true&isIrishSourceNo=true&prePoll=false&postPoll=true&register=gb&register=ni&register=none&optCols=Register&optCols=CampaigningName&optCols=AccountingUnitsAsCentralParty&optCols=IsSponsorship&optCols=IsIrishSource&optCols=RegulatedDoneeType&optCols=CompanyRegistrationNumber&optCols=Postcode&optCols=NatureOfDonation&optCols=PurposeOfVisit&optCols=DonationAction&optCols=ReportedDate&optCols=IsReportedPrePoll&optCols=ReportingPeriodName&optCols=IsBequest&optCols=IsAggregation

Registered parties report donations to the Electoral Commission quarterly using a standard form. That can be submitted by post, email, or inputted directly to our online system. We publish all of the data provided on our website. As such, there is generally no correspondence by which donations are reported other than the form itself. All of the information on the form is published, except where any data protection restrictions prevent that.

The relevant quarterly donations reports received by the Commission are set out below, with the date received.

Quarter	Date report received
Q1 2020	30/04/2020
Q2 2020	24/07/2020
Q3 2020	29/10/2020
Q4 2020	27/01/2021
Q1 2021	27/04/2021

I can confirm that we hold accompanying correspondence for each of these reports but nothing relating to donations from Lord Brownlow, so they are not within the scope of your request.

In each case the sender was an officer of the Conservative and Unionist Party from the party's Compliance team. We are not disclosing their names as that information falls within the description of personal data; relating directly to an identifiable living individual. Disclosure of this information would breach the first data protection principle, which states the information must be processed fairly and lawfully. This information is therefore exempt under section 40(2) of the Act.

In each case the report and accompanying correspondence was sent to an automated mail box the Commission makes available to parties for this purpose.

In each case an acknowledgement was sent to the sender by a member of Commission staff. The Commission's policy is not to disclose the names of staff below senior leadership level for the same reasons as set out below in relation to an external organisation's staff. This information is therefore exempt under section 40(2) of the Act.

The quarter 2 report for 2021, covering April to June, is due to be delivered by 30 July and will be published as soon as practicable after receipt.

Exemption under section 40(2):

Information is exempt under section 40(2) of the Freedom of Information Act 2000 (FOIA) where release of the information would breach one of the data protection principles in the GDPR. One of the principles states that personal data must be processed fairly and lawfully.

Any personal data that is not already in the public domain has been redacted.

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