[redacted]

From: FOI
Sent: 06 July 2021 15:31
To: [redacted]
Subject: FOI 060-21 - Response

Dear [redacted],

Our Ref: FOI-060-21

Thank you for your emails to the Electoral Commission dated 3 May 2021 and received by the Commission on 4 May 2021.

The Commission aims to respond to requests for information promptly and has done so within the statutory timeframe (inclusive of a 20-working-day extension to consider exemptions and the application of the Public Interest test).

Your requests are shown below, followed by our response:

Request 1: sent 3 May at 20:12
Please could you send me all correspondence, emails, forms or reports that you hold that relate to advice or guidance provided by the electoral commission to any representatives of the following campaign groups:

Young Unionists
Businesses For The Union
Divided We Fall
Exposing SNP
Mr Brian Monteith
SB supports the Union Ltd

I am particularly interested in emails that relate to any discussions that may have taken place about these groups formally registering with the Electoral Commission in any/all elections/referendums.

I am also interested in any discussions or advice provided by the Electoral Commission that relate to the declaration of large donations to these groups.

I appreciate that some documentation may need to redacted in order to mitigate against data protection concerns. Please send all responses in an electronic format to this email address.

Request 2: sent 3 May at 20:26
Please could you send me all correspondence, emails, forms or reports that you hold that relate to advice or guidance provided by the electoral commission to any representatives of the campaign group Capitalist Worker.

I am particularly interested in emails that relate to any discussions that may have taken place about whether the group formally registering with the Electoral Commission during the 2019 General election.

I am also interested in any discussions or advice provided by the Electoral Commission that relate to the declaration of large donations to this group.

I appreciate that some documentation may need to redacted in order to mitigate against data protection concerns. Please send all responses in an electronic format to this email address.

Request 3: sent 4 May at 10:39 via WhatDoTheyKnow
I would be grateful if you could send me the following information regards the Reclaim Party: http://search.electoralcommission.org.uk/English/Registrations/PP9050

1/ The constitution provided by the party to the EC in relation to its registration.
2/ Copies of any correspondence between the EC and representatives of the Reclaim Party in relation to its registration.
3/ Any other documentation provided by party representatives as part of the registration and/or Laurence Fox's campaign for London Mayor.

I understand it will be necessary to redact some parts of the requested materials in order to mitigate against disclosure of personal data.

Request 4: sent 4 May at 10:44 via WhatDoTheyKnow
Please could you send me all correspondence, emails, forms or reports that you hold that relate to advice or guidance provided by the electoral commission to any representatives of the campaign group Centre Point Strategies:
http://search.electoralcommission.org.uk/English/Registrations/TP11376

I am particularly interested in emails that relate to any discussions that may have taken place about the group formally registering with the Electoral Commission during any election or referendums.

I am also interested in any discussions or advice provided by the Electoral Commission that relate to the declaration of large donations to this group and the identities of donors.

I appreciate that some documentation may need to redacted in order to mitigate against data protection concerns. Please send all responses in an electronic format to this email address.

On 8 May 2021 you provided the following clarification:

Request 1
If possible could I request all correspondence between the Electoral Commission and the groups identified in this request.

The specific timeframe should be considered any correspondence relating to the 2021 Scottish Parliamentary elections.

For large donations £1000 and above.

Request 2
If possible could I request all correspondence between the Electoral Commission and the Capitalist Worker organisation and it's representatives.

The specific timeframe should be considered any correspondence relating to the 2019 UK General Election.

For large donations £1000 and above.

Request 4
If possible could I request all correspondence between the Electoral Commission and Centre Point Strategies and it's representatives.

For large donations £1000 and above.

Taking into account the above we have set out below how we have interpreted your request and our response:

Your request	**Our response**
Request 1: All correspondence between the Electoral Commission and the following bodies from the start of the regulated period for the 2021 Scottish Parliamentary elections (6 January 2021) to the date of your request (4 May 2021): Young Unionists Businesses For The Union Divided We Fall Exposing SNP Mr Brian Monteith SB supports the Union Ltd	We hold the information you have requested.
Request 2: All correspondence between the Electoral Commission and Capitalist Worker from the start of the regulated period for the 2019 UK Parliamentary General election to the date of your request (13 December 2018 – 4 May 2021).	We hold the information you have requested.
Request 3: The constitution provided by The Reclaim Party when the party name was changed from Brexit Express (BE) to The Reclaim Party. All correspondence between the Electoral Commission and The Reclaim Party in relation to the application to change the party name from Brexit Express (BE) to The Reclaim Party. Any other documentation provided by party representatives as part of the application to change the party name from	We hold the information you have requested. Part of your request relates to correspondence regarding the change of name of the Brexit Express (BE) party to The Reclaim Party. This correspondence has already been published and is included in the response to FOI 019-21 which is available on our website here. Part of your request relates to the constitution and financial scheme submitted by The Reclaim Party. These documents have already been published and are included in the response to FOI

Brexit Express (BE) to The Reclaim party and/or Laurence Fox's campaign for London Mayor.	082-21 which is available on www.whatdotheyknow.com here.
Request 4: All correspondence between the Electoral Commission and Centrepoint Strategies.	We hold the information you have requested.

Some of the information we hold is exempt from disclosure for the reasons explained below.

Exemption: Investigations and proceedings: Section 30(1)(a)(i) Freedom of Information Act 2000

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 an exemption from disclosure for 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.

Some of the information requested is held by the Commission in relation to such an investigation.

Public interest test

Application of the section 30 exemption is subject to the public interest test. There are a number of factors that must be weighed in the balance to consider whether the public interest in applying the exemption outweighs the public interest in disclosure.

Public interest factors in favour of disclosure

The Commission recognises that with regard to the disclosure of information generally, there should be a presumption in favour of disclosure. We also recognise that there is a general public interest in promoting transparency, accountability, public understanding and involvement in the democratic process. Flowing from that general public interest, there is a legitimate public interest in our carrying out investigations in an open and transparent way, and in promoting public understanding of the decisions we make as a regulator.

Public interest factors in favour of applying the exemption

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.

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 individuals and entities 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.

If information provided in the course of our investigations 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.

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 make public the outcomes of all of our investigations. In doing so we will again carefully consider the public interest in promoting understanding of our decisions.

Balance of the public interest

In assessing where the public interest balance lies in section 30(1) case relevant matters include:

(a) the stage a particular investigation or prosecution has reached;

(b) whether and to what extent the information is already in the public domain;

(c) the significance or sensitivity of the information requested; and

(d) whether there is any evidence that an investigation or prosecution has not been carried out properly which may be disclosed by the information.

In this case the investigation is ongoing. The information requested is not in the public domain, the information requested is in the Commission's view sensitive and significant, and no evidence appears to be put forward to suggest that the investigation is not being carried out properly. All of these factors add weight to the public interest in maintaining the exemption in the Commission's view.

The Commission considers that the balance of public interest in this case lies on the one hand in carrying out investigations in an open and transparent way, and in promoting public understanding of the decisions we make as a regulator; and on the other in our ability to conduct investigations effectively in future, as well as on our wider regulatory work.

The Commission considers that the 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 was met in part by the fact that we will make public the outcome. We will consider carefully the appropriate level of detail to disclose at that time to meet both our regulatory objectives and the public interest in promoting understanding of our decisions.

The Commission does not consider that disclosure of specific evidence in this case would add to any significant degree to public understanding of our decisions. In addition, we consider it likely that disclosure could lead to a significant impact on the voluntary cooperation of organisations and individuals involved in this case, and others regulated by the Commission, with a consequent impact on our ability to conduct investigations effectively in future, as well as on our wider regulatory work.

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

Exemption: Law enforcement: Section 31(1)(g) Freedom of Information Act 2000

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 s31(2)(a) of the FOI Act.

For the same reasons set out above in relation to s.30, the Commission is satisfied that the information requested would likely prejudice the exercise of the Commission's functions under PPERA to conduct investigations into potential breaches of the reporting requirements.

Further, again for the same reasons set out above in respect of s.30, the Commission is satisfied that in this case the public interest in preventing that prejudice outweighs the public interest in disclosure.

The Commission therefore considers the information you have requested and which we hold to be exempt from disclosure under section 31 to the extent that it not exempt under section 30.

Exemption: Information reasonably accessible by other means: Section 21 Freedom of Information Act 2000

Information is exempt under section 21 of the Freedom of Information Act 2000 if the information requested is reasonably accessible to the applicant by other means.

In relation to request three, we hold information in the scope of this request which has been released in response to other Freedom of Information requests. We consider this correspondence reasonably accessible to you by other means and have included links to the information in this letter.

We have therefore not disclosed these documents and information as part of this request.

Exemption: Personal information: Section 40(2) Freedom of Information Act 2000
You will notice that in the attached information, some of the information has been redacted. Information is exempt under section 40(2) of the FOIA if it constitutes the personal data of third parties (anyone other than the requester) where complying with the request would breach any of the principles in the UK GDPR. Personal information belonging to individuals that is not already contained on our public register, or that belongs to junior members of Commission staff, satisfies these qualities and therefore we have not disclosed it to you.

Not within the scope of your request
Some information has been redacted as it does not fall within the scope of your request.

To access the documents we are releasing, you will need to use our secure document-sharing site, Objective Connect:

You will receive an 'Invitation to Objective Connect Email Notification'. This notification will contain a link to enable you to start accessing your information. Please find below details on how to access 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 – 060-21’
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 **6 August 2021, at 5pm.**

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

Text sent to 'Exposing SNP' Facebook page and 'Young Unionists' Facebook page	Date 12/02/2021

Dear Sir/Madam

As part of our monitoring work during the Scottish Parliamentary election we have noticed you are placing ads/campaign material on Facebook. For this election, the Scottish Government has introduced a legal requirement for imprints on digital election material. An imprint tells voters who is authorising/promoting the material they are seeing.

Political parties and non-party campaigners must carry an imprint on all election materials (printed and digital) during the regulated period which runs from 6 January to 6 May 2021. Candidates must follow the rules from the point they officially become candidates. It is an offence to place digital material online during the regulated is period without an imprint and enforcement action may be taken where breaches occur.

We are drawing the requirement to your attention to allow you to comply in relation to any digital election material you may publish during the regulated period. To assist you, we have published guidance (see links below) on imprints for candidates, parties and NPCs on our website. There are also spending rules that parties, candidates and non-party campaigners must comply with. Again this information is on our website. Should you wish to discuss, please do not hesitate to get in touch. Meantime, I would be grateful if you would acknowledge receipt.

[redacted]

The Electoral Commission

NPC - https://www.electoralcommission.org.uk/media/7656
Party - https://www.electoralcommission.org.uk/media/7655
Candidate - https://www.electoralcommission.org.uk/media/7654

Dear Brian Monteith,

Registration of Mr Brian Monteith / ThinkScotland

I write to inform you that we have processed and approved your notification to register **yourself** as a non-party campaigner which was submitted on 24 March 2021 and considered complete on 31 March 2021. Your registration is in effect from 31 March 2021.

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.

Addresses of individual NPCs will not appear on the register.

Your entry on the register is:
http://search.electoralcommission.org.uk/English/Registrations/TP12817
(please allow a day for the entry to appear on the register)

	Post/Home address	Email	Telephone
Responsible person: Mr Brian Monteith **Campaign name:** ThinkScotland*	[redacted]	[redacted]	

*We include commonly-used campaign names in NPC entries on the register to ensure that voters can easily identify campaigners at elections, as well as ensure that campaign spending is transparent.

Guidance

You can find our general guidance for NPCs here and our guidance for the 2021 elections here. If you have any questions about spending or reporting, please contact us at infoscotland@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 a renewal notification 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 30 June 2022. 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

Dear Brian,

Thank you for your email.

I can confirm that the details of your notification have been put to the Decision Maker who will take the final decision on your notification to register. We expect to be able to notify you of the outcome early next week.

Yours sincerely,

[redacted]

From: Brian Monteith [redacted]>
Sent: 08 April 2021 17:06
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Mr Brian Monteith - receipt of notification CCM:0389494

Dear [redacted]

I thought I should write and ask if there's any possibility of expediting my application. I am keen to start campaigning again, as I currently have everything on hold as per the guidance. It's now 8th April and I have always replied promptly so nothing is being held up by me. Could you come back to me with news of progress?

Best regards

Brian

On Tue, 6 Apr 2021 at 12:54, Partyreg <Partyreg@electoralcommission.org.uk> wrote:

> Dear Brian Monteith,
>
> Thank you very much for providing this information. I will ensure that it is put to the Director of Regulation, who takes decisions to approve the registrations of NPCs. If there is any further information we need from you then we will be in touch again.
>
> And thank you for confirming that [redacted]. The home address details for individual NPCs are not published on our public register.
>
> Yours sincerely,
>
> [redacted]
>
> **From:** Brian Monteith [redacted]
> **Sent:** 06 April 2021 08:52
> **To:** Partyreg <Partyreg@electoralcommission.org.uk>
> **Subject:** Re: Mr Brian Monteith - receipt of notification CCM:0389494
>
> Dear [redacted]

Thank you for your e-mail. I trust you had a good Easter break and are now back at your desk wherever that may be.

Let me try and answer your questions so that we may proceed to complete the registration process.



There was initially a limited company registered at Companies House called Dunedin Public Relations Ltd but it was established only to protect the trading name and never actually traded. I later dissolved the company as it was no longer required. Dunedin Public Relations is therefore not a limited company nor is it an unincorporated association, as it is just me. I am the sole proprietor.

I (and therefore Dunedin Public Relations) own the domain name and full title to thinkscotland.org as an individual.

I therefore believed that it was the appropriate course of action to register as an individual.

If you believe that this is incorrect then the other option is, as you say, to register as an unincorporated association. Think Scotland is not currently an unincorporated association but it could be established quickly and the application be re-submitted on its behalf.

With regard to my home address where I am registered to vote it is:



The other address I provided is a trading address which I can be contacted at. For reasons of privacy and security I am keen that my home address is not published, but I understand from your documentation that it is undisclosed. I would appreciate it if you could confirm that. The imprint used on the Facebook adverts is the trading address, which ensures that people can contact me wherever I might be in the world.

I'd be grateful if this matter could be resolved as soon as possible.

Regards,

Brian

On Thu, 1 Apr 2021 at 18:05, Partyreg <Partyreg@electoralcommission.org.uk> wrote:

> Dear Brian Monteith,
>
> Thank you for your reply to my email of yesterday.
>
> I have considered the information in your email, and having spoken to a colleague in our Financial Reporting Team, it may be more appropriate to register the organisation as a NPC rather than yourself. Whilst the expenditure on materials is done by yourself, as you have described, it is done so on behalf of ThinkScotland and would therefore likely be classed as notional expenditure under the spending rules.
>
> As mentioned previously, only certain types of organisations can register as NPCs with us (outlined on page 6 of this guidance document). If you are able to provide a bit more information to us then we can advise further on what type of organisation is most suitable for the purposes of registration and what information you would be required to provide.
>
> For instance, I note from ThinkScotland's terms and conditions that ""ThinkScotland" is a not-for-profit trading name of Dunedin Public Relations". It would be helpful to know what the nature of Dunedin Public Relations' structure is and its relationship to ThinkScotland.
>
> Furthermore, the requirement for registering a UK registered company is that it is incorporated in the UK and carries on business in the UK. However, I have not been able to find any current company information about Dunedin Public Relations. Is this company still active and carrying on business in the UK?
>
> If you are not an incorporated body such as a registered company, then it is possible that you should register as an "unincorporated association" instead. An unincorporated association is defined as comprising "two or more persons … which carries on business or other activities wholly or mainly in the United Kingdom and whose main office is there." [redacted] If you are an unincorporated association for the requirements of registration then you would be required to provide us with the names of the associations members (or its officers or governing body if the association has more than 15 members) in addition to the association's main office address in the UK.
>
> If you are able to provide some further details with respect to the observations made above then we will be able to clarify the appropriate registration for you as a NPC (either as a company or unincorporated association, or as an individual).

Finally, thank you for confirming your voter registration address as:

[redacted]

The requirement for registering as an individual NPC is that you provide your home address in the UK. Should you be required to register as an individual NPC after all, we will need you to confirm that this is your correct home address as it is different to the one given in your notification.

Yours sincerely,

[redacted]

From: Brian Monteith [redacted]
Sent: 31 March 2021 16:44
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Mr Brian Monteith - receipt of notification CCM:0389494

Dear [redacted]

Thank you for your email. I can reply directly immediately.

I read and re-read your guidance before applying. ThinkScotland.org is an online political and cultural forum that occasionally produces reports – hence it is also described as an online thinktank, but publishing articles is its main activity. It is wholly owned by myself. I am the editor. it has existed since 2006 and I began editing it in 2009. All other people involved are either my part time technical help (one person paid under contract for uploading articles) or volunteers (authors). [redacted]

ThinkScotland publishes a wide variety of material from political articles (political theory, economics, party politics) to movie reviews, book reviews, a weekly Mummy's Diary, military recollections and general musing about life. It uses Facebook adverts and Tweets to promote what it publishes so that the audience might grow. It is not for profit and does not charge a subscription to readers but is free to all. Adverts are supported by appeals for donations.

The website does not support one particular party but it does support Scotland staying in the United Kingdom, as such its output regularly opposes the policies and record of the SNP and the SNP Government. Advertising of articles will most definitely go over £10,000 during the regulated period (but are below that at the moment and will not be allowed to go above it until I have registration approved in writing). Therefore I have applied for a personal registration as a non-party campaign individual. This is because the adverts are in my name and the imprint bears my name and registered address – and the payments are coming out of my credit card as I do not have a business credit card. I am not applying for all the other advertising expenditure of the

website's output which is not politically associated with opposing the SNP in the election. It is easy for me to track the advertising spending and provide records of the relevant political advertising for the EC to see my spending details. Facebook tracks and publishes all the advertising for public view so you are able to see that my records are accurate.

For instance, I published an article about Covid-19 in Venezuela in january [https://www.thinkscotland.org/thinkpolitics/articles.html?read_full=14410] – it was only about Venezuela – and I spent £50 advertising it. This is clearly not an election expense so I would not want ThinkScotland to have to record that within the spending limits. By registering as an individual campaigner I can separate out the non-election advertising from the election advertising.

I trust that this information reassures you that I had just reasons to apply as an individual non-party campaigner. If there are further problems please do not hesitate to contact me.

In addition, in the hope that it might help progress the speed of my application I attach a scan of my polling card for the forthcoming elections in May showing my electoral address.

Best regards

Brian Monteith
[redacted]

On Wed, 31 Mar 2021 at 15:33, Partyreg <Partyreg@electoralcommission.org.uk> wrote:

> Dear Brian Monteith,
>
> Thank you for your notification to register as a non-party campaigner, which we received on 24 March 2021. You are 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 07 April 2021 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.

Type of third party campaigner

Your notification indicates that you intend to register as an individual campaigner. You have also mentioned in your notification, however, that your website is https://www.thinkscotland.org/about-us/team/. This website belongs to a think tank called "Think Scotland" which appears to comprise of more than one individual.

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.

We would be grateful if you could clarify whether or not you intend to register as an individual campaigner, or register "Think Scotland" as a non-party campaigner.

If you intend to register as "Think Scotland", you must deliver a new notification and provide information depending on what type of organisation Think Scotland is.

Next steps

If you intend to amend your notification please do so as soon as possible and no later than 07 April 2021.

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

From: Brian Monteith
To: [redacted]
Cc: Partyreg; [redacted]
Subject: Re: Think Scotland
Date: 30 March 2021 11:29:01

Dear [redacted]

Further to my previous correspondence I thought it would be helpful if I wrote to confirm the following:

1) I applied online to the EC on 24 March 2021 to become registered as a third party individual campaigner to account for the political advertising that I am undertaking during the regulated election period of the Scottish Parliament. As I also advertise non-political articles it was not appropriate and could have been confusing to register as ThinkScotland.org.;

2) I have updated the existing contact details already carried by the Facebook advertising to now carry the address for the EC registration so that it all ties together and conforms with imprint requirements.

I look forward to hearing from the EC regarding the registration. I have currently suspended the advertising so that I do not cross over the £10,000 threshold.

Best regards

Brian

On Mon, 22 Mar 2021 at 16:44, [redacted] wrote:

> Brian
>
> Thanks for the speedy response. You will appreciate that the digital imprint requirements are new, hence we are trying to be proactive in making organisations that may be publishing regulated campaign activity aware of the rules.
>
> You can also find our guidance for non party campaigners on our website here
>
> https://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/non-party-campaigners/non-party-campaigner-2021-elections
>
> If you have any questions in relation to the imprint or non party campaigning rules, please do not hesitate to contact me.
>
> [redacted]
>
> [redacted]
>
> **The Electoral Commission**

electoralcommission.org.uk

From: Brian Monteith <[redacted]
Sent: 22 March 2021 16:23
To: [redacted]
Subject: Re: Contact form - Ticket number: #801052

Dear [redacted]

Many thanks for your communication. Both these issues are being attended to but I appreciate you taking the trouble to write and advise of the new legislation. We already carry details of who is promoting our Facebook adverts (which cover more than just articles about politics) but this is under regular review and I shall check against the advice you have provided a link for. We are also refreshing the design of the website and shall be ensuring that any necessary imprint is carried on that too. Similarly there shall be a registration now that it is clear that the spending threshold shall probably be crossed next month, a development that was not certain after our Facebook adverts were stopped due to erroneous complaints by opponents gaming the Facebook complaints system.

If you need to contact me this e-mail address will probably elicit a quicker response.

Best regards

Brian Monteith

Editor

From: ThinkScotland [redacted]>
Sent: 22 March 2021 12:52
To: [redacted]>
Subject: Contact form - Ticket number: #801052

Contact form

Name: [redacted]
Email: [redacted]
Comments: Dear Sir/Madam As part of our monitoring work during the Scottish Parliamentary election we have noticed you are placing ads/campaign material on Facebook. For this election, the Scottish Government has introduced a new legal requirement for imprints on digital election material. An imprint tells voters who is authorising/promoting the material they are seeing. Political parties, candidates and non-party campaigners must carry an imprint on all election materials (printed and digital) during the regulated period which runs from 6 January to 6 May 2021. This includes materials carried on websites, and digital platforms such as Twitter and Facebook. It is an offence to place digital material online during the regulated is period without an imprint and enforcement action may be taken where breaches occur. We are drawing the requirement to your attention to allow you to comply in relation to any digital election material you may publish during the regulated period. To assist you, we have published guidance (see links below) on imprints for candidates, parties and NPCs on our website. There are also spending rules that parties, candidates and non-party campaigners must comply with. Again this information is on our website. There are also spending rules that parties, candidates

> > and non party campaigners should be aware of. Should you wish to discuss, please do not hesitate to get in touch. Meantime, I would be grateful if you would acknowledge receipt. NPC - https://www.electoralcommission.org.uk/media/7656 Party - https://www.electoralcommission.org.uk/media/7655 Candidate - https://www.electoralcommission.org.uk/media/7654
>
> Ticket number: #801052
>
> ThinkScotland
>
> Email - [redacted]

Dear [redacted]

I can confirm that I am happy with the change of address.

Very best wishes,

Tom

On Thu, 15 Apr 2021 at 10:42, Partyreg <Partyreg@electoralcommission.org.uk> wrote:

> Dear Matt,
>
> Thank you for your email. We have found the following further matters for consideration.
>
> **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).
>
> Registered address
>
> An unincorporated association, when delivering a notification to be registered, must provide "the address of its main office in the United Kingdom" in the notification. This is stipulated under section 88(c)(i) and paragraph 2(10)(b) of Schedule 6 of the Political Parties, Elections and Referendums Act 2000 (PPERA).
>
> As noted below, if you do not have an office as in a dedicated business space from which you operate, then we advise that you provide us with an address from which the association's activity is primarily conducted. From the information provided you have stated that [redacted] is the principle place of activity currently. Please note, the address of an unincorporated association's main office will be published on our register if the notification is approved. **Could Mr Pridham confirm, by replying to this email, that he has authorised this change to the notification?**
>
> Relevant Participators
>
> A notification to register a unincorporated association as a non-party campaigner must include the names of the body's relevant participators.
>
> For an unincorporated association, 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. Otherwise, the relevant participators are the members of the association.
>
> **We have found information that suggests [redacted] and [redacted] may be associated with this unincorporated association, however these individuals are not named in the notification. Please could you provide information addressing this potential discrepancy?**
>
> **Next steps**
>
> If you intend to amend your notification please do so as soon as possible and no later than 19 April 2021. **Please let us know if you would like to amend your notification online. Otherwise you can reply with the relevant information to this email address (partyreg@electoralcommission.org.uk).**
>
> 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

From: Matthew Kilcoyne [redacted]
Sent: 12 April 2021 13:53
To: Partyreg <Partyreg@electoralcommission.org.uk>
[redacted]
Subject: Re: Businesses for the Union - further information needed CCM:0553300

Good afternoon [redacted]

Was just wondering if there was any update on the registration or any other issues that you'd like to raise that we can address?

Kind regards,

Matt

On Fri, Apr 9, 2021 at 1:04 PM Partyreg <Partyreg@electoralcommission.org.uk> wrote:

> Dear Matt,
>
> Thank you for getting back to me promptly. Please consider this as confirmation of receipt of the below email.
>
> Yours sincerely,
>
> [redacted]
>
> [redacted]
>
> **The Electoral Commission**
>
> electoralcommission.org.uk
>
> **From:** Matthew Kilcoyne [redacted]
> **Sent:** 08 April 2021 17:21
> **To:** Partyreg <Partyreg@electoralcommission.org.uk>
> **Cc** [redacted]
> **Subject:** Re: Businesses for the Union - further information needed

Hi [redacted]

Lovely to hear from you.

I'd put my long-term registered address in [redacted] as I'm continually contactable to and from there and was intending to be up in Scotland for the duration of the campaigning period. But as with current restrictions I'm stuck at [redacted]. I can put this address down as that's where I'm currently spending the vast majority of my day and is the principal place of activity right now.

[redacted]

However my main address remains: [redacted]

With regards the relevant participators:

As Director I run the day to day operations of the unincorporated association, including editorial control and spending decisions.

Tom Pridham in his role as secretary acts as a confirmatory party, ensuring that all receipts are accounted for and match amounts spent and declared.

Hope this helps, I'm happy to answer any and all questions via phone too [redacted]

Kind regards,

Matt

On Thu, Apr 8, 2021 at 3:53 PM Partyreg <Partyreg@electoralcommission.org.uk> wrote:

> Dear Matthew,
>
> Thank you for your notification to register as a non-party campaigner, which we received on 01 April 2021. **Businesses for the Union** 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 13 April 2021 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.
>
> Registered address
>
> An unincorporated association, when delivering a notification to be registered, must provide “the address of its main office in the United Kingdom” in the notification. This is stipulated under section 88(c)(i) and paragraph 2(10)(b) of Schedule 6 of the Political Parties, Elections and Referendums Act 2000 (PPERA).
>
> If you do not have an office as in a dedicated business space from which you operate, then we advise that you provide us with an address from which the association’s activity is primarily conducted. Please note, the address of an unincorporated association’s main office will be published on our register if the notification is approved. **Could you please confirm that the address you have provided is the address of your main office in the United Kingdom?**
>
> Relevant Participators
>
> A notification to register a unincorporated association as a non-party campaigner must include the names of the body’s relevant participators.

For an unincorporated association, 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. Otherwise, the relevant participators are the members of the association.

Could you please provide some further information about how the relevant participators listed in the notification are the list of relevant participators for the organisation?

Next steps

If you intend to amend your notification please do so as soon as possible and no later than 13 April 2021. **Please let us know if you would like to amend your notification online. Otherwise you can reply with the relevant information to this email address (partyreg@electoralcommission.org.uk).**

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

From: Partyreg
Sent: 07 April 2021 16:51
To: [redacted]
Cc: [redacted]
Subject: Businesses for the Union - confirmation of receipt

Dear Mr Kilcoyne,

Thank you for your notification to register as a non-party campaigner, which we received on 01 April 2021.

Next steps

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.

We may write to you during the assessment process seeking further information from you about the notification.

Otherwise, we will contact you again once we have made a decision.

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

Dear Matt,

Registration of Businesses for the Union

I write to inform you that we have processed and approved your notification to register **Businesses for the Union** as a non-party campaigner which was submitted on 01 April 2021 and considered complete on 15 April 2021. Your registration is in effect from 15 April 2021.

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/TP12818
(please allow a day for the entry to appear on the register)

	Post/Home address	Email	Telephone
Campaigner Headquarters	**8A Stirling Road Larkhall Clapham London SW9 9EE**	[redacted]	[redacted]
Responsible person: Matthew Kilcoyne	-	[redacted]	[redacted]
Secretary: Tom Pridham	-	[redacted]	[redacted]
Names of relevant participators:	• Matthew Kilcoyne • Tom Pridham		

Guidance

You can find our general guidance for NPCs here and our guidance for the 2021 elections here. Below we have highlighted some specific guidance. If you have any questions about spending or reporting, please contact us at 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 a renewal notification 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 15 July 2022. 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: Partyreg
To: "Divided We Fall"
Cc: PEF Inbox
Bcc: [redacted]
Subject: RE: Campaign group registering queries
Date: 29 January 2021 13:47:08

Dear [redacted],

Apologies for the delay in responding to your query.

You have enquired about whether the organisations mentioned in your email should be registered as separate groups.

If you work together with other non-party campaigners, this may affect the amount you have to spend towards the spending limit and whether you need to register as a non-party campaigner. You may decide to work together with other non-party campaigners on regulated campaigning as part of a coordinated plan or arrangement that is intended to achieve a common purpose. We call these campaigns 'joint campaigns'. There are a number of different ways you can work together with other campaigners as part of a joint campaign:

- you can be a non-party campaigner working with other campaigners
- you can be involved in a 'lead campaign' as either a 'lead campaigner' or a 'minor campaigner'
- you can be a non-party campaigner working with other campaigners where there is at least one lead campaigner and minor campaigner

If non-party campaigners work together as part of a joint campaign, their combined regulated campaign spending will count towards the spending limit of each non-party campaigner involved. Different rules will apply depending on how you work with other non-party campaigners in your joint campaign.

For more information on joint campaigns see our guidance. If you have further questions relating to joint campaigning please contact our Finance Team at pef@electoralcommission.org.uk (also copied into this email).

You also enquired about whether any personal addresses would be published on the register.

An notification to register a NPC must state the name and address of the individual or organisation. It is not a requirement for the responsible person to provide their home address when registering an organisation as an NPC.

As such, whilst the address of the organisation will be contained in its entry on the register, the home address for individuals will not (unless it happens to also be the organisation's address). For more information on registering as a non-party campaigner please see our guidance.

Yours sincerely,

[redacted]

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Divided We Fall <[redacted]>
Sent: 06 January 2021 07:28
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Campaign group registering queries

Dear Sir or Madam,

I'm attempting to register a new pan-UK unionist campaign group (Divided We Fall) ahead of May's Scottish Parliament elections and I have a couple of quick queries:

Firstly Divided We Fall runs a Scotland specific sub-group called Exposing SNP. The two work very closely together and will be submitting a joint spending return (if we manage to raise enough money for this to be necessary). I wanted to check should I register both Divided We Fall and Exposing SNP as separate groups or just Divided We Fall and list Exposing SNP as it's alternative name?

Also my understanding is whilst the registered address for the campaign will be published private addresses of our officers will be kept private - just wanted to check this is the case? Very happy for the Divided We Fall address to be available but would be pretty nervous about having my personal address (or those of our supporters) publicly available.

Thanks and best wishes,

[redacted]

Dear Robert Kilgour,

Thank you for your notification to register as a non-party campaigner, which we received on 17 March 2021. SB Supports the Union Limited 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 24 March 2021 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.

Carrying on business

In order to be registered as a non-party campaigner, a company must carry on business in the United Kingdom.

According to your company's latest filing history, the company appears to be dormant. This indicates that the not currently carrying out any business.

We would be grateful if you could confirm whether or not the company is dormant, or whether it is carrying on business in the UK.

We appreciate that you have indicated in your notification that:
The company represents Scottish business owners who support Scotland remaining as part of the United Kingdom.

If there is any further information you can provide explaining how the company carries on business in the UK then we would be grateful if you could provide it to us.

Next steps

Please provide the information requested above as soon as possible and no later than 24 March 2021.

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

Dear [redacted]

I am responding to your email to Robert Kilgour in my capacity as Responsible Person.

The company was set up in April 2017 when there was increasing talk of a second, highly divisive independence referendum for Scotland, following the Brexit referendum. This was considered by many Scottish business owners to be potentially damaging to their businesses, creating a great deal of anxiety and impacting on investment. There was no united voice for Scottish businesses at that time, and so the company was formed to provide that voice.

The company did not trade up to 30 April 2020, when the last dormant company accounts were submitted. It commenced trading after that date however, and the original core membership has increased from an Advisory Board of 12, to an Advisory Council of 49. It has received donations from supporters that have to date been mostly deployed on compiling and providing information to members and committed supporters, but it is the clear intention to get the company's message out to a wider audience in the run up to the May Holyrood election. It is likely that the expenditure on regulated campaign activity will quickly exceed the £10k threshold, hence the application to register.

As to whether the company is carrying on business, its modus operandi will be to seek donations from committed supporters which it will deploy in a variety of ways. Much of the expenditure will be on projecting the facts of what voting for an independent Scotland, separate from the rest of the UK will mean – in terms of currency issues, the alienation of Scotland's biggest trading partner, the difficulties an independent Scotland will face in seeking to become a member of the EU, the inevitable funding 'black hole' once support from Westminster ceases, etc. The Council members believe it is vitally important that the voting public are made aware of all of these issues before they cast their vote in the May election.

I trust this provides a sufficient additional explanation of what the company is seeking to do, and permits its application to proceed.

Yours sincerely,

Ian M P Condie

Ian M P Condie, Responsible Person

From: Partyreg [mailto:Partyreg@electoralcommission.org.uk]
Sent: 19 March 2021 10:58
To: [redacted]
Cc: [redacted]
Subject: SB Supports the Union Limited - receipt of notification CCM:0389482

Dear Robert Kilgour,

Thank you for your notification to register as a non-party campaigner, which we received on 17 March 2021. SB Supports the Union Limited 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 24 March 2021 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.

Carrying on business

In order to be registered as a non-party campaigner, a company must carry on business in the United Kingdom.

According to your company's latest filing history, the company appears to be dormant. This indicates that the not currently carrying out any business.

We would be grateful if you could confirm whether or not the company is dormant, or whether it is carrying on business in the UK.

We appreciate that you have indicated in your notification that:

The company represents Scottish business owners who support Scotland remaining as part of the United Kingdom.

If there is any further information you can provide explaining how the company carries on business in the UK then we would be grateful if you could provide it to us.

Next steps

Please provide the information requested above as soon as possible and no later than 24 March 2021.

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

Dear Ian Condie,

Registration of SB Supports the Union Limited

I write to inform you that we have processed and approved your notification to register **SB Supports the Union Limited** as a non-party campaigner which was submitted on 17 March 2021 and considered complete on 17 March 2021. Your registration is in effect from 17 March 2021.

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/TP12813
(please allow a day for the entry to appear on the register)

	Post/Home address	Email	Telephone
Campaigner Headquarters	Suite 2 Stuart House Eskmills Station Road MUSSELBURGH EH21 7PB	[redacted]	[redacted]
Responsible person: Ian Condie	-	[redacted]	[redacted]
Secretary: Robert Kilgour	-	[redacted]	[redacted]
Names of relevant participators:	• Robret Kilgour • Struan Stevenson		

Guidance

You can find our general guidance for NPCs here and our guidance for the 2021 elections here. Below we have highlighted some specific guidance. If you have any questions about spending or reporting, please contact us at infoscotland@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 a renewal notification 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 17 June 2022. 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

Date: 2019-11-18	Subject: Form TP1 registration
To: partyreg@electoralcommission.org.uk	From: [redacted]

Electoral Commission,

Please find attached form TP1 in respect of the unincorporated association Capitalist Worker.

Please let me know if you have any questions.

Regards,

Max Young

Partyreg,
Here is the information you requested, along with the original copy of our registration.
Relevant Participators
There are only three members: myself, Conrad Young and Brian Monteith, as specified the registration form TP1.
Campaign Activity
I attach some screenshots of the content we intend to publish – videos and articles.
I hope this is sufficient – do let me know if you need any more information.
Many thanks,
Max Young

From: Partyreg
Sent: 19 November 2019 11:49
To: [redacted]
Subject: Capitalist Worker - receipt of notification CCM:0462755

Dear Max,

Thank you for your notification to register as a non-party campaigner, which we received on 18 November 2019. **Capitalist Worker** 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 22 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.

Campaign Activity

Could you please provide some examples of the type of campaigning or campaign material that you intend to undertake or publish?

Relevant Participators

A notification to register a unincorporated association as a non-party campaigner must include the names of the body's relevant participators.

For an unincorporated association, 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. Otherwise, the relevant participators are the members of the association.

Could you please confirm how many members the association has?

Next steps

If you intend to amend your notification please do so as soon as possible and no later than 22 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

Dear [redacted]
Attached is the requested TP2 form that should confirm details changed.
Let me know if there's anything else you need.
Many thanks,
Max Young

From: Partyreg
Sent: 27 November 2019 17:17
To: Max Young
Subject: RE: Capitalist Worker - Registration confirmation CCM:0462763

Dear Max,
Thank you for providing an updated office address. This address will appear on the public register
Could you please complete a TP2 form as a matter of urgency.
Should you require further information, please do not hesitate to contact me.
Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Max Young
Sent: 27 November 2019 16:57
To: Partyreg
Subject: Re: Capitalist Worker - Registration confirmation CCM:0462763

Michaela,
As discussed earlier, here is the main office address for Capitalist Worker:
Capitalist Worker, 95 Mortimer Street, London W1W 7GB
Don't hesitate to contact me if there's anything else you need.
Many thanks,
Max Young

> On 27 Nov 2019, at 2:32 pm, Partyreg <Partyreg@electoralcommission.org.uk> wrote:
>
> Dear Max,
> Thank you for contacting the Electoral Commission
> An unincorporated association must register the address of the body's main office. The notification must include the name of the association's main office in the United Kingdom or Gibraltar.This is a requirement in law set out in the Political Parties, Elections and Referendums Act 2000 (PPERA). **As you are aware this address will appear on the public register**.
> You can change the NPCs registered address by completing a TP2 form. You can find the form here.
> Please read the explanatory notes carefully before completing the form. The form must be signed by yourself.
> Please note this must be the association's main office address. Before we process an application to amend the NPCs registered details we may ask for evidence of an office change.
> Should you require further information, please do not hesitate to contact me.

Yours sincerely,

[redacted]

The Electoral Commission

electoralcommission.org.uk

From: Max Young <[redacted]>
Sent: 27 November 2019 11:28
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: RE: Capitalist Worker - Registration confirmation CCM:0462763

Partyreg,

Many thanks for the confirmation of registration.

I would like to establish that my address, as below, is private, and I'd like to request that it not be published on the register.

Please do give confirmation of this.

Many thanks,

Max Young

From: Partyreg
Sent: 27 November 2019 11:01
To: Max Young
Subject: Capitalist Worker - Registration confirmation CCM:0462763

Dear Max,

Registration of Capitalist Worker

I write to inform you that we have processed and approved your notification to register **Capitalist Worker** as a non-party campaigner which was submitted on 18 November 2019 and considered complete on 18 November 2019. Your registration is in effect from 18 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/TP11379
(please allow a day for the entry to appear on the register)

	Post/Home address	Email	Telephone
Campaigner Headquarters	[redacted]	[redacted]	[redacted]

	[redacted]		
Responsible person: Maximilian Young		[redacted]	[redacted]
Secretary: Maximilian Young		[redacted]	
Names of relevant participators:	• Maximilian Young • Conrad Young • Brian Monteith		

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 18 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

Dear Max,

Further to our phone call earlier, attached is the excel version of the spending return. Please note, you will have to use the PDF version to report donations.

You will notice that there is a supplier tab. The '**upload** reference' on the **supplier** sheet should correspond with the '**supplier** reference' on the Individual Payment sheet. By ensuring that the **supplier** reference corresponds with the **upload** reference next to the relevant supplier name on the supplier sheet, the system will pull the details through. This means that you are not required to input supplier names and address each time you input a new line of expenditure.

Please note, the supplier reference and upload reference cannot contain any spaces or special characters and must not be more than 20 characters.

So, if you made 91 payments to a supplier, you must input 91 lines using the same supplier reference (e.g. Facebook) for each line.

The upload reference column on the **individual payment** sheet is not necessary for the upload, therefore you could either leave it blank or use the supplier reference.

Just to confirm, all payments must be represented individually on separate lines. Therefore, if 91 payments were made to FB you would have 91 lines of expenditure. Each line must include the correct incurred and paid dates for each payment.

You must include invoices for all payments over £200. Therefore, if 90 out of 91 of the payments were over £200, we would expect to see 90 invoices.

The invoices can be sent to use either by post or by email to pef@electoralcommission.org.uk – please ensure that the invoices are submitted alongside the spending and donations return.

PEF Online Account

I understand from our phone call and the information below that you do not intend to set up an account. This means you will not be able to submit the return using the system.

However, as noted above, if you intend to submit by email using the excel form it will not be necessary to create an account; the EC will be able to upload the information to the system.

I hope this is helpful, please let me know if you have any further queries relating to the spending and donations return.

Kind regards,

[redacted]

From: Max Young <[redacted]>
Sent: 02 March 2020 10:13
To: [redacted] <[redacted]>
Subject: RE: RE: Important information: NPC reporting reminder CCM:0336065

Dear [redacted]

I was wondering if you could provide some assistance on the matter of submitting a spending return. I'd like to complete the return using the PEF Online system, though I don't recall ever setting up an "account" for the Commission, instead registering through email with scanned forms. As such, I have no login details, but don't wish to register on the system as this is only for new parties or third parties. (https://pefonline.electoralcommission.org.uk/default.aspx)

Further to this, the link to the Nominate System Administrator form (https://www.electoralcommission.org.uk/__data/assets/pdf_file/0010/117793/form-pefo1.pdf) that seems to be required "if you are already registered as a party user and/or campaigner and you would like to start submitting your returns online" does not seem to function.

I've attempted to call the PEF help number, but have had no answer. Do you know what the problem might be?

Many thanks,

Max

From: [redacted]
Sent: 02 March 2020 09:23
To: Max Young
Subject: RE: Important information: NPC reporting reminder CCM:0336065

Dear Mr Young,

Thank you for confirming that Capitalist Worker spent over the registration threshold but not over £250,000 and so will submit on 12 March 2020.

Kind regards,

[redacted]

From: Max Young <[redacted]>
Sent: 28 February 2020 11:27
To: [redacted]
Subject: RE: Important information: NPC reporting reminder CCM:0336065

Dear [redacted]

I would like to confirm that total spend is not over £250,000.

Many thanks,

Max Young

From: [redacted]
Sent: 17 February 2020 15:49
To: [redacted]
Subject: Important information: NPC reporting reminder CCM:0336065

Dear Mr Young,

I am writing to explain your spending and donations reporting responsibilities as a registered non-party campaigner following the United Kingdom Parliamentary general election (UKPGE) 2019.

Do I need to complete a spending return?

You must complete a spending return if you spent above the registration threshold on regulated activity in any part of the UK during the regulated period that ran from 13 December 2018 to 12 December 2019. This is £20,000 in England, or £10,000 in either Scotland, Wales or Northern Ireland.

Action: If you did not spend above these thresholds, you do not need to complete a spending return, but should let us know by return email that this is the case confirming the amount you spent. Please respond by Friday 28 February.

Action: If you did spend above any of the registration thresholds, you must report your spending and donations to us in full not later than:

- **12 March 2020 if total spending was £250,000 or under**
- **12 June 2020 if total spending was over £250,000**

NPC's with a total spend of over £250,000 must also submit an independent auditors report.

Action: Please confirm, in your response to this email, whether or not your total spend is over £250,000. Please confirm this by Friday 28 February.

Failure to submit a complete return by the statutory deadline will be dealt with in line with the Commission's published Enforcement Policy.

How do I complete my return?

There are three methods by which you can complete the return:

- using our online database PEF Online

- by email - one form each for spending (form / explanatory notes) and donations (form / explanatory notes)
- on paper – one form each for spending and donations using the same forms as above

Please note that you must download the forms to your PC in the first instance in order to view their content.

Our email system will reject files larger than 7MB. If this is an issue, contact us to discuss an alternative.

What does my return need to include?

You must submit:

- A statement of all payments made including payments, notional expenditure, unpaid expenses and disputed claims
- Invoices for payments over £200
- A donation report, including details of:
  - all impermissible donations
  - all accepted donations over £7,500
  - all accepted donations that add up to over £7,500 from the same donor
  - the total of all other accepted donations that were worth more than £500 and less than or equal to £7,500. You do not need to provide details of these donations, just the total figure
- A declaration by the responsible person

The European Parliamentary elections took place during the regulated period for the UKPGE. This means that all general non-party campaign spending in the local government elections and for the European Parliamentary Elections will be counted against the spending limit for the UKPGE.

What do we publish?

After receipt of your return we publish it. Your return is the document that we receive/hold on the due date for returns. This is the document on which we undertake compliance checks and is the basis of any necessary enforcement action.

If we believe the return is inaccurate you may in some instances have the opportunity to amend it later but this will not alter the fact that the version delivered might lead to enforcement action. In other cases it may be published in the form in which it is submitted to us. You should therefore ensure it is accurate and invoices are easily referenced. We have attached a sheet of practical tips to assist you to make sure your return is correct

Do I need to submit a statement of accounts?

Certain organisations registered with us as a non-party campaigner must send us a statement of accounts following a UK Parliamentary general election.

The accounts must be submitted within 9 months of the election if your total campaign spending was £250,000 or less or within 12 months of the election if your total spending is over £250,000.

Some NPC's will be exempt from submitting accounts. You will be exempt from submitting a statement of accounts to us if:

- You are already legally required to submit a statement of accounts that we are able to inspect; and

- That statement of accounts contains the following information:
  - an income and expenditure account for the regulated period
  - a balance sheet, showing assets and liabilities of the organisation as at the end of the regulated period

Further information on how to complete a statement of accounts can be found here in our Overview of NPC Accounts.

What resources are available to help?

We have produced a suite of guidance documents on the rules that apply to non-party campaigners, and on how to complete your paperwork.

We are here to help, so if on reading the documents, you have further questions, please don't hesitate to contact us at pef@electoralcommission.org.uk.

Kind regards,

[redacted]

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

Date: 2020-03-02	Phone call: 2020-03-02 – Max Bruno Young PEF Online
To: Maximilian Young	From: [redacted]
Help setting up PEFO account to submoit NPC retrun	

PEF,

The last instalment (of 3) of the invoices is attached.

Apologies for the email complications.

Many thanks,

Max Young

On Sun, Mar 8, 2020 at 10:28 PM Max Young <[redacted]> wrote:

> PEF,
>
> The bulk of the second half of invoices is attached. Email is proving a more problematic form of sending these PDFs.
>
> Do let me know if it is a problem.
>
> Many thanks,
>
> Max Young
>
> On Sun, Mar 8, 2020 at 10:22 PM Max Young <[redacted]> wrote:
>
> > PEF,
> >
> > Attached are half of the invoices for Capitalist Worker over £200. The other half will be sent in a follow up email.
> >
> > Apologies for any inconvenience this causes.
> >
> > Many thanks,
> >
> > Max Young
> >
> > On Sun, Mar 8, 2020 at 10:18 PM Max Young <[redacted]> wrote:
> >
> > > PEF,
> > >
> > > I would like to submit spending and donation information for the NPC Capitalist Worker, reference [redacted], during the regulated period 18/11/2019-17/12/2019.
> > >
> > > Attached are the excel document, provided by the Electoral Commission, detailing all spending during the regulated period, TP4(ii) form detailing donations.
> > >
> > > Due to the file size limit for emails, I will send all invoices for spending over £200 in a reply email.
> > >
> > > I would much appreciate a confirmation of submission, and do let me know if there is anything else you need, or any issues at all.
> > >
> > > Many thanks,
> > >
> > > Max Young

Hi Max,

Thank you for sending the invoices again, I can confirm that we received the four emails containing 45 invoices. So in total, we have received 58 invoices.

Kind regards,

[redacted]

From: Max Young <[redacted]>
Sent: 11 March 2020 16:09
To: [redacted]
Subject: Re: Spending Return Submission Query CCM:0336127

Dear [redacted]

I've sent along the missing components in four separate emails. Hopefully the file size per email will be small enough to get through. If not, I think we'll have to come up with another way to get the files to you.

Do let me know if these get through to you.

Cheers,

Max

On Wed, Mar 11, 2020 at 2:42 PM [redacted] wrote:

> Hi Max,
>
> The invoices don't seem to have come through. Could you check to see if the emails are larger than 7 MB please? If they are, they may need to be split across a few more emails.
>
> Thanks,
>
> [redacted]
>
> **From:** Max Young <[redacted]>
> **Sent:** 11 March 2020 12:36
> **To:** [redacted]
> **Subject:** Re: Spending Return Submission Query CCM:0336127
>
> [redacted]
>
> Many thanks for confirming this. I've forwarded the first two instalments to the PEF email. I hope this sorts the issue out.
>
> Many thanks again,

Max

On Wed, Mar 11, 2020 at 11:47 AM [redacted] wrote:

> Hi Max,
>
> Apologies for not responding sooner. We received your spending and donations return on Sunday 08 March.
>
> It is possible that we have only received 1/3 of the invoices. I have the final batch of invoices in the third email. This email contains a chain implying that there were 2 other batches, however I don't seem to have received them. Could you please resend batch 1 and 2 to pef@electoralcommission.org.uk
>
> Kind regards,
>
> [redacted]
>
> **From:** Max Young <[redacted]>
> **Sent:** 11 March 2020 11:24
> **To:** [redacted]
> **Subject:** Spending Return Submission Query
>
> Dear [redacted]
>
> I'd just like to check, if it's possible, that the Commission has received the spending return, donor information and invoices I sent to the PEF email address. This is just because I asked in my email to them for a receipt of submission and haven't got anything back.
>
> I attach the excel spending return for reference, which I hope will be work for submission.
>
> Do you know if the Commission has received the information for Capitalist Worker? (Reference [redacted])
>
> Many thanks and apologies for any inconvenience caused,
>
> Max Young

Newsletter for parties and campaigners

30 April 2020

Like people up and down the country, here at the Commission, we are adapting to new ways of working during this challenging environment. With the welcome decision to postpone the May elections, our primary focus is to work in support of responses to the coronavirus outbreak from the Government, politicians and the wider electoral community. We are continuing to work on the annual electoral registers canvass and planning towards elections in May 2021, and to deliver a programme of support to assist parties and campaigners as well as voters and the electoral community.

We are mindful of the impact of COVID-19 on the regulated community. As you know, two major statutory deadlines for submitting financial data come at the end of April: both the statements of accounts for parties and accounting units with income under £250,000, and donation and loan reports for quarter one 2020 are due today. We have been working with many of you to understand any challenges you face in meeting these deadlines and are committed to finding suitable solutions. We are also in contact with parties ahead of the 12 June deadline for spending returns of over £250,000 from the 2019 general election. I hope you find this update useful. If you would like to discuss anything included here, or any other issue related to your legal responsibilities, please get in touch.

Louise Edwards, Director of Regulation

Political Finance Online

We are making good progress with our new online tool, Political Finance Online. The recent move to remote working has not impacted the project and we are still on track to roll it out in January 2021. The tool will make it quicker and easier for you to update registered details and to report financial information, making it even easier for you to comply with your statutory responsibilities. The tool will feature help text, reminders, guidance and pop up warnings, such as alerts for any donation under £500 which you report.

To make sure the tool is as user friendly as possible, we are extensively testing the system before it goes live. We committed to building in efficiencies and will provide you with a user guide before the system launches. If you have any questions, please contact Neil Tingay via pef@electoralcommission.org.uk.

A review of the 2019 general election

We have published our statutory report on the general election. It finds the poll was generally well-run, and that there were high levels of satisfaction with the processes of registering to vote and voting.

However, we also found evidence of challenges for the future, which should be addressed. Through our public opinion survey, a significant minority of nearly one in five people told us they were not confident in the way the election had been run, with the most common concerns relating to campaigning or the media. Through our survey of candidates, more than half of respondents (54%) said they had concerns about standing for election related to possible threats, abuse or intimidation. We also found that the significant strain under which electoral administration structures are operating is affecting the service received by voters, in some areas.

Our report sets out a number of specific improvements that would support trust and confidence in election campaigns and make a real difference to voters, candidates and campaigners:

1. Campaigners, candidates and political parties need to take greater responsibility for the presentation and content of campaigns they run and the impact of their activities on public confidence in elections.

2. Social media companies need to provide more detailed and accurate data about election campaigns and spending in ad libraries on their platforms so we and voters can see more information about who is campaigning.

3. Political parties and other campaigners, the UK Government and social media companies, working with the police and the Commission, must continue to take steps to tackle intimidation. It is vital that people are not discouraged from standing for election or campaigning because of the risk of abuse, threats or intimidation.

The report's findings have been informed by research carried out with members of the public, campaigners, candidates, electoral administrators and police force representatives.

Read our full report and recommendations

A new tool to compare candidate spending at elections

We have launched a new interactive tool which allows people to view and compare how candidates spent money at the 2019 UK general election. The tool provides greater transparency into how candidates spent money to influence voters. It allows users to find and analyse information and is pre-loaded with searches for candidates who spent the most and the least, and who received the most in donations. Users can also input their own search criteria and compare spending by majority, largest spend without winning a seat, constituency size, and compare the spend of party leaders.

Explore the data using our tool

2019 European Parliamentary elections spending returns

At the start of April we published the campaign spending returns of the eight political parties that spent over £250,000 during the 2019 European Parliamentary elections. Altogether, these parties reported spending of £11,471,082.

Of these eight parties, five submitted spending reports which are missing information that would give voters a complete picture of their campaign spending. We are now considering this in line with our Enforcement Policy.

2019 electoral fraud data

This month we published data on allegations of electoral fraud, covering all electoral events that took place in 2019.

The data continues to show that the UK has low levels of proven electoral fraud; 585 cases of alleged electoral fraud were investigated by the police during 2019. Of these, around half of cases resulted in no further action following an initial investigation, and 188 cases were locally resolved by the police.

Two cases led to a conviction, one for a nomination offence in Norfolk and one for using someone else's vote at a polling station in West Yorkshire. One individual in West Mercia was given a police caution for using someone else's vote.

As in previous years, more than half of all reported cases were campaigning offences. The majority of these were about campaigners not including an imprint on election material, or someone making false statements about the personal character or conduct of a candidate.

Explore the full data

Codes of Practice on election spending

This week, we have presented the finalised Codes of Practice to the Minister of the Constitution and Devolution, ahead of them being laid before Parliament. To improve the clarity and effectiveness of the Codes, they have been updated following further feedback from Government and from political parties.
The Codes will clarify for candidates, their agents and political parties what items of spending count towards the spending limits and are to be reported; when spending should be reported in a candidate return or a party return; and how to report spending, including on digital campaigning.
If approved by Parliament this year the Codes would then apply to candidates at elections in 2021 and subsequent years, and to parties at the next scheduled Northern Ireland Assembly election and UK Parliamentary general election in 2024.
We will shortly be submitting the Welsh Codes to the National Assembly for Wales, and the consultation on the Scottish Codes was launched last week and closes on 15 July 2020. The content of those Codes is the same as the UK Codes, except for aspects that describe the party list systems and the two ballots which voters cast at those elections. They are intended to be introduced in time to apply to the Scottish Parliament and National Assembly for Wales elections in May 2021. Once

enacted, these Codes will similarly improve transparency, fairness, and support voter confidence in political campaign finance.

Latest deadlines

Due date for donation and loans reports for Quarter 1 (January, February, March)	**Thursday 30 April 2020**
Due data for statements of accounts for parties and accounting units with income under £250,000	**Thursday 30 April 2020**
Last day for political parties and non-party campaigners who spent more than £250,000 at the 2019 UKPGE to submit campaign spending returns.	**Friday 12 June 2020**

If you have any questions please contact our team at pef@electoralcommission.org.uk

Cylchlythyr i bleidiau ac ymgyrchwyr

30 Ebrill 2020

Fel pobl ledled y wlad, yma yn y Comisiwn, rydym yn addasu i ffyrdd newydd o weithio yn ystod yr amgylchedd heriol hwn. Gyda'r penderfyniad i ohirio etholiadau mis Mai, ein prif ffocws yw gweithio i gefnogi ymatebion i'r achosion coronafirws gan y Llywodraeth, gwleidyddion a'r gymuned etholiadol ehangach. Rydym yn parhau i weithio ar ganfasio a chynllunio cofrestrau etholiadol blynyddol tuag at etholiadau ym mis Mai 2021, a darparu rhaglen gefnogaeth i gynorthwyo pleidiau ac ymgyrchwyr yn ogystal â phleidleiswyr a'r gymuned etholiadol.

Rydym yn ymwybodol o effaith COVID-19 ar y gymuned reoledig. Fel y gwyddoch, daw dau ddyddiad cau statudol mawr ar gyfer cyflwyno data ariannol ddiwedd mis Ebrill: mae'r datganiadau cyfrifon ar gyfer partïon ac unedau cyfrifyddu sydd ag incwm o dan £250,000, ac adroddiadau rhoddion a benthyciadau ar gyfer chwarter un 2020, yn ddyledus heddiw. Rydym wedi bod yn gweithio gyda llawer ohonoch i ddeall unrhyw heriau rydych chi'n eu hwynebu wrth gyflawni'r terfynau amser hyn ac rydym wedi ymrwymo i ddod o hyd i atebion addas. Rydym hefyd mewn cysylltiad â phleidiau, ynghylch y dyddiad cau ar 12 Mehefin,

sef y dyddiad cau ar gyfer ffurflenni gwariant o dros £250,000 o etholiad cyffredinol 2019. Rwy'n gobeithio y bydd y diweddariad hwn yn ddefnyddiol i chi. Os hoffech drafod unrhyw beth a gynhwysir yma, neu unrhyw fater arall sy'n ymwneud â'ch cyfrifoldebau cyfreithiol, cysylltwch â ni.

Louise Edwards, Cyfarwyddwr Rheoleiddio

Cyllid Gwleidyddol Ar-lein

Rydym yn gwneud cynnydd da gyda'n teclyn ar-lein newydd, "Political Finance Online". Nid yw'r sefyllfa diweddar o weithio o bell wedi effeithio ar y prosiect ac rydym yn dal i fod ar y trywydd iawn i'w gyflwyno ym mis Ionawr 2021. Bydd yr offeryn yn ei gwneud yn gyflymach ac yn haws i chi ddiweddaru manylion cofrestredig ac adrodd ar wybodaeth ariannol, gan ei gwneud hi'n haws fyth i chi gydymffurfio â'ch cyfrifoldebau statudol. Bydd yr offeryn yn cynnwys testun cymorth, nodiadau atgoffa, arweiniad a rhybuddion naid, fel rhybuddion am unrhyw rodd o dan £500 yr ydych chi'n eu hadrodd.

Er mwyn sicrhau bod yr offeryn mor hawdd ei ddefnyddio â phosibl, rydym yn profi'r system yn helaeth cyn iddi fynd yn fyw. Rydym wedi ymrwymo i gynnwys effeithlonrwydd a byddwn yn darparu canllaw defnyddiwr i chi cyn i'r system lansio. Os oes gennych unrhyw gwestiynau, cysylltwch â Neil Tingay pef@electoralcommission.org.uk.

Adolygiad o etholiad cyffredinol 2019

Rydym wedi cyhoeddi ein hadroddiad statudol ar yr etholiad cyffredinol. Mae'n dangos bod yr etholiad yn gyffredinol wedi cael ei redeg yn dda, a bod yno lefelau uchel o foddhad ar y broses o gofrestru i bleidleisio a phleidleisio ei hun.

Fodd bynnag, gwelsom hefyd dystiolaeth o heriau ar gyfer y dyfodol, y dylid mynd i'r afael â hwy. Trwy ein harolwg barn gyhoeddus, dywedodd lleiafrif sylweddol o bron i un o bob pump o bobl wrthym nad oeddent yn hyderus yn y ffordd yr oedd yr etholiad wedi'i gynnal, gyda'r pryderon mwyaf cyffredin yn ymwneud ag ymgyrchu neu'r cyfryngau. Trwy ein harolwg o ymgeiswyr, dywedodd mwy na hanner yr ymatebwyr (54%) fod ganddynt bryderon ynghylch sefyll mewn etholiad oherwydd pryderon am fygythiadau, camdriniaeth neu ddychryn posibl. Gwelsom hefyd fod y straen sylweddol y mae strwythurau gweinyddiaeth etholiadol yn gweithredu oddi tano yn effeithio ar y gwasanaeth a dderbynnir gan bleidleiswyr, mewn rhai meysydd.

Mae ein hadroddiad yn nodi nifer o welliannau penodol a fyddai'n cefnogi ymddiriedaeth a hyder mewn ymgyrchoedd etholiadol ac yn gwneud gwahaniaeth gwirioneddol i bleidleiswyr, ymgeiswyr ac ymgyrchwyr:

4. Mae angen i ymgyrchwyr, ymgeiswyr a phleidiau gwleidyddol gymryd mwy o gyfrifoldeb am gyflwyniad a chynnwys yr ymgyrchoedd mae nhw'n eu cynnal ac effaith eu gweithgareddau ar hyder y cyhoedd mewn etholiadau.

5. Mae angen i gwmnïau cyfryngau cymdeithasol ddarparu data manylach a chywir am ymgyrchoedd etholiadol a gwariant mewn llyfrgelloedd hysbysebu ar eu platfformau fel y gallwn ni a phleidleiswyr weld mwy o wybodaeth am bwy sy'n ymgyrchu.

6. Rhaid i bleidiau gwleidyddol ac ymgyrchwyr eraill, Llywodraeth y DU a chwmnïau cyfryngau cymdeithasol, gan weithio gyda'r heddlu a'r Comisiwn, barhau i gymryd camau i fynd i'r afael â bygwth. Mae'n hanfodol nad yw pobl yn cael eu hannog i beidio â sefyll mewn etholiad neu ymgyrchu oherwydd y risg o gam-drin, bygythiadau neu ddychryn.

Mae canfyddiadau'r adroddiad wedi cael eu llywio gan ymchwil a gynhaliwyd gydag aelodau o'r cyhoedd, ymgyrchwyr, ymgeiswyr, gweinyddwyr etholiadol, a chynrychiolwyr yr heddlu.

Darllenwch ein hadroddiad llawn a'n hargymhellion

Teclyn newydd o weld a chymharu gwariant ymgeiswyr mewn etholiadau

Rydym wedi lansio teclyn rhyngweithiol newydd sy'n caniatáu i bobl weld a chymharu sut y gwariodd ymgeiswyr arian yn etholiad cyffredinol 2019 y DU. Mae'r offeryn yn darparu mwy o dryloywder o ran sut y gwariodd ymgeiswyr arian i ddylanwadu ar bleidleiswyr. Mae'n caniatáu i ddefnyddwyr ddod o hyd i wybodaeth a'i dadansoddi ac mae wedi'i lwytho ymlaen llaw gyda chwiliadau am ymgeiswyr a wariodd y mwyaf a'r lleiaf, ac a dderbyniodd y mwyaf mewn rhoddion. Gall defnyddwyr hefyd fewnbynnu eu meini prawf chwilio eu hunain a chymharu gwariant yn ôl mwyafrif, gwariant mwyaf heb ennill sedd, maint etholaeth, a chymharu gwariant arweinwyr plaid.

Archwiliwch y data gan ddefnyddio ein teclyn

Ffurflenni gwariant etholiadau Seneddol Ewropeaidd 2019

Ar ddechrau mis Ebrill gwnaethom gyhoeddi enillion gwariant ymgyrch o'r wyth plaid wleidyddol a wariodd dros £250,000 yn ystod etholiadau Seneddol Ewropeaidd 2019. At ei gilydd, nododd y partïon hyn wariant o £11,471,082.

O'r wyth plaid hyn, fe wnaeth pump plaid gyflwyno adroddiadau gwariant sydd ddim gyda'r holl wybodaeth a fyddai'n rhoi darlun cyflawn o wariant ymgyrchu i bleidleiswyr. Rydym nawr yn ystyried hyn yn unol â'n Polisi Gorfodi.

Data twyll etholiadol 2019

Y mis hwn gwnaethom gyhoeddi data ar honiadau o dwyll etholiadol, gan gwmpasu'r holl ddigwyddiadau etholiadol a gynhaliwyd yn 2019.

Mae'r data yn parhau i ddangos bod gan y DU lefelau isel o dwyll etholiadol profedig; cafodd 585 o achosion o dwyll etholiadol honedig eu hymchwilio gan yr heddlu yn ystod 2019. O'r rhain, ni

arweiniodd tua hanner yr achosion at unrhyw gamau pellach yn dilyn ymchwiliad cychwynnol, a datryswyd 188 o achosion yn lleol gan yr heddlu.

Arweiniodd dau achos at gollfarn, un am drosedd enwebu yn Norfolk ac un am ddefnyddio pleidlais rhywun arall mewn gorsaf bleidleisio yng Ngorllewin Swydd Efrog. Cafodd un unigolyn yng Ngorllewin Mercia rybudd gan yr heddlu am ddefnyddio pleidlais rhywun arall.

Fel mewn blynyddoedd blaenorol, roedd mwy na hanner yr holl achosion yr adroddwyd arnynt yn droseddau ymgyrchu. Roedd y mwyafrif o'r rhain yn ymwneud ag ymgyrchwyr nad oeddent yn cynnwys argraffnod ar ddeunydd etholiad, neu rywun yn gwneud datganiadau ffug am gymeriad personol neu ymddygiad ymgeisydd.

Archwiliwch y data llawn

Codau Ymarfer gwariant etholiadol

Yr wythnos hon, rydym wedi cyflwyno'r Codau Ymarfer terfynol i'r Gweinidog Cyfansoddiad a Datganoli, cyn iddynt gael eu gosod gerbron y Senedd. Er mwyn gwella eglurder ac effeithiolrwydd y Codau, fe'u diweddarwyd yn dilyn adborth pellach gan y Llywodraeth a chan bleidiau gwleidyddol. Bydd y Codau yn egluro i ymgeiswyr, eu hasiantau a'u pleidiau gwleidyddol pa eitemau o wariant sy'n cyfrif tuag at y terfynau gwariant sydd i'w hadrodd; pryd y dylid adrodd ar wariant mewn ffurflen ymgeisydd neu ffurflen plaid; a sut i adrodd gwariant, gan gynnwys ar ymgyrchu digidol.
Os cânt eu cymeradwyo gan y Senedd eleni byddai'r Codau wedyn yn berthnasol i ymgeiswyr mewn etholiadau yn 2021 a'r blynyddoedd dilynol, ac i bleidiau yn etholiad nesaf Cynulliad Gogledd Iwerddon ac etholiad cyffredinol Seneddol y DU yn 2024.
Cyn bo hir, byddwn yn cyflwyno Codau i Gymru i Gynulliad Cenedlaethol Cymru, ac fe lansiwyd ymgynghoriad ar Godau'r Alban yr wythnos diwethaf sydd yn cau ar 15 Gorffennaf 2020. Mae cynnwys y Codau hynny yr un peth â Chodau'r DU, heblaw am agweddau sy'n disgrifio'r systemau rhestrau pleidiau a'r ddwy bleidlais y mae pleidleiswyr yn eu bwrw yn yr etholiadau hynny. Y bwriad yw eu cyflwyno mewn pryd i wneud cais i etholiadau Senedd yr Alban a Chynulliad Cenedlaethol Cymru ym mis Mai 2021. Ar ôl eu deddfu, bydd y Codau hyn yn yr un modd yn gwella tryloywder, tegwch, ac yn cefnogi hyder pleidleiswyr yng nghyllid ymgyrch wleidyddol.

Y dyddiadau cau diweddaraf

Dyddiad dyledus ar gyfer adroddiadau rhoddion a benthyciadau ar gyfer Chwarter 1 (Ionawr, Chwefror, Mawrth)	**Dydd Iau 30 Ebrill 2020**
Data dyledus ar gyfer datganiadau cyfrifon ar gyfer partïon ac unedau cyfrifyddu sydd ag incwm o dan £250,000	**Dydd Iau 30 Ebrill 2020**
Diwrnod olaf i bleidiau gwleidyddol ac ymgyrchwyr nad ydynt yn bleidiau a	**Dydd Gwener 12 Mehefin 2020**

wariodd fwy na £250,000 yn UKPGE 2019 i gyflwyno ffurflenni gwariant ymgyrchu.

Os oes gennych unrhyw gwestiynau, cysylltwch â'n tîm pef@electoralcommission.org.uk

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

Date: 2020-08-25	Subject: 2020-08-25 Reminder SOAs due
To: [redacted]	From: [redacted]

Dear Responsible person,

Registered non-party campaigners are required to submit statement of accounts to the Commission in certain circumstances.

If you spent under £250,000 at the UKPGE the deadline for the submission of statement of accounts is 12 September 2020. Please see our guidance on statement of accounts here to decide if you are required to submit accounts.

We note that some entities will still be having difficulties complying with statutory deadlines owing to the restrictions around Covid-19.
If it is not possible to meet a statutory deadline, please email us with an explanation as to why this is the case before the deadline passes. If we know that COVID-19 is affecting you getting your return in, we can support you and take the circumstances into account.
We recognise that a significantly different approach will be required to compliance and enforcement in this climate and we will be regulating appropriately.

Kind regards,

[redacted]

[redacted]

The Electoral Commission
electoralcommission.org.uk

Dear Max,

Thank you for letting us know. I have updated our records.

You are not required to provide any further information at this time.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Max Young <[redacted]>
Sent: 16 February 2021 21:36
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Capitalist Worker - RESPOND NOW TO REMAIN REGISTERED CCM:0553129

Dear Partyreg,

I am happy for Capitalist Worker, reference [redacted] to be deregistered.

Let me know if there's anything else you need.

Many thanks,

Max Young

On Tue, Feb 2, 2021 at 11:14 AM Partyreg <Partyreg@electoralcommission.org.uk> wrote:

> Dear Mr Young,
>
> **Please ignore the information in the previous email. Information regarding your non-party campaigner annual renewal for 2021 can be found below.**
>
> **Non-party campaigner annual renewal due to be delivered**
> In order to remain registered as a non-party campaigner, each year Capitalist Worker must submit a renewal notification to us.
>
> As the relevant signatory, you are responsible in law for delivering this notification. To allow time to resolve any issues with processing your notification we recommend that you do this as soon as possible. The deadline for delivering your notification is 18 February 2021. This deadline falls within the regulated period for the Scottish and Welsh parliamentary elections which runs from 6 January 2021 to 06 May 2021. If you are due to deliver returns for these elections, then the renewal deadline is extended to 6 May.

However, if you are not due to make a return then the deadline remains as **18 February 2021**

If we do not receive a complete notification that complies with the requirements outlined in the Political Parties, Elections and Referendums Act 2000 (PPERA) by the deadline, we are required in law to remove the campaigner from the register. This is not a discretionary decision by us.

Do you need to remain registered?
Before submitting a renewal, you should consider whether you need to remain registered at this time. Non-party campaigners are only required to register with us if they spend, or plan to spend, more than £20,000 in England or £10,000 in any of Scotland, Wales or Northern Ireland on 'regulated campaign activity' during a regulated period. You do not need to be registered if you are campaigning outside a regulated period. Please note that should a campaigner's registration lapse and they need to be registered in future, a fresh notification to register can be submitted to us at that time.

What you need to do to remain registered

Please submit the notification **by email, you can find the relevant TP3 form on** our website.
You can send a scanned copy by email to partyreg@electoralcommission.org.uk

Our COVID-19 arrangements
Ordinarily, we would accept notifications delivered to us either through our PEF Online system or by post. However, under the current COVID-19 arrangements, our office building is closed until further notice and all staff are working remotely.

This means that if you send any correspondence to us by post then it is at risk of not being received, and we may consider that you have not fulfilled your statutory obligation.

Please submit your notification online if possible. **If you need to submit by post then please get in touch so that we can make the necessary arrangements.**

Please ensure you read the instructions carefully to ensure the notification of renewal is completed correctly. In particular, if any of the campaigner's registered details have changed then you must amend these.

We aim to tell you about the outcome of your application within six weeks. If we don't receive a complete application that complies with PPERA by the deadline, we are required by law to remove a campaigner from the register.

If you need more information view our guidance on non-party campaigns or contact us.

Yours sincerely,

[redacted]

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Partyreg
Sent: 02 February 2021 09:55
To: [redacted]
Subject: Capitalist Worker - RESPOND NOW TO REMAIN REGISTERED CCM:0553129

Dear Mr Young,

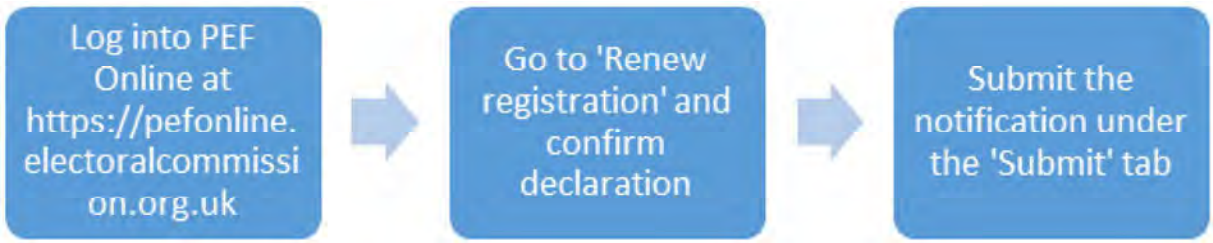
Non-party campaigner annual renewal due to be delivered
In order to remain registered as a non-party campaigner, each year Capitalist Worker must submit a renewal notification to us.

As the relevant signatory, you are responsible in law for delivering this notification. To allow time to resolve any issues with processing your notification we recommend that you do this as soon as possible. The deadline for delivering your notification is 18 February 2021.

If we do not receive a complete notification that complies with the requirements outlined in the Political Parties, Elections and Referendums Act 2000 (PPERA) by the deadline, we are required in law to remove the campaigner from the register. This is not a discretionary decision by us.

Do you need to remain registered?
Before submitting a renewal, you should consider whether you need to remain registered at this time. Non-party campaigners are only required to register with us if they spend, or plan to spend, more than £20,000 in England or £10,000 in any of Scotland, Wales or Northern Ireland on 'regulated campaign activity' during a regulated period. You do not need to be registered if you are campaigning outside a regulated period. There is no regulated period in operation in 2020 Please note that should a campaigner's registration lapse and they need to be registered in future, a fresh notification to register can be submitted to us at that time.

What you need to do to remain registered
The easiest way is to respond is on **PEF online**.



Should you prefer to submit the notification **by email you can find the relevant TP3 form on** our website.

You can send a scanned copy by email to partyreg@electoralcommission.org.uk

Our COVID-19 arrangements
Ordinarily, we would accept notifications delivered to us either through our PEF Online system or by post. However, under the current COVID-19 arrangements, our office building is closed until further notice and all staff are working remotely.

This means that if you send any correspondence to us by post then it is at risk of not being received, and we may consider that you have not fulfilled your statutory obligation.

Please submit your notification online if possible. **If you need to submit by post then please get in touch so that we can make the necessary arrangements.**

Please ensure you read the instructions carefully to ensure the notification of renewal is completed correctly. In particular, if any of the campaigner's registered details have changed then you must amend these.

We aim to tell you about the outcome of your application within six weeks. If we don't receive a complete application that complies with PPERA by the deadline, we are required by law to remove a campaigner from the register.

If you need more information view our guidance on non-party campaigns or contact us.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

Dear Mr Young,

Thank you for your call earlier.

I can confirm that we have received the below information and I have updated the notification accordingly.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Max Young <[redacted]>
Sent: 15 April 2021 14:56
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Not Recieved: TP1 Registration Confirmation

Dear [redacted]

Thank you for your email.

I would like to confirm that the unincorporated association Capitalist Worker has not conducted any regulated activity since December 2019 and that there are no plans to conduct further regulated activity.

I would also like to clarify that I am acting in a role equivalent to secretary of the unincorporated association Young Unionists. I am responsible for all communications and administration for Young Unionists.

In addition to this I would like to clarify that Heather Rainey's role in the unincorporated association is equivalent to researcher and does not handle communications. She does not act as secretary. I hope that this explains the situation adequately.

Do let me know if there is any more information that you need or if anything else needs to be clarified.

Many thanks,

Max Young

On 15 Apr 2021, at 2:21 pm, Partyreg <Partyreg@electoralcommission.org.uk> wrote:

Dear Mr Young,

Thank you for your notification to register as a non-party campaigner, which we received on 29 March 2021. **Young Unionists** 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 20 April 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.

Capitalist Worker

An individual cannot be appointed as the responsible person for more than one registered non-party campaigner.

We note that you are listed as the responsible person for Capitalist Worker. As this entity was registered on 18 November 2019, if there were no elections, then your registrations would have lapsed on 18 February 2021 (unless you had renewed). As we are now in a regulated period for a relevant UK election, however, the renewal deadline may be extended and the registration may still be in force.

To help determine whether your original notification for Capitalist Worker is still in force, we would be grateful if you could confirm at this stage what regulated activity Capitalist Worker has conducted thus far in Wales or in Scotland during the regulated period (which began on 6 January).

It is also open to you to nominate a different person to be the responsible person for Young Unionists.

Secretary

A notification to register an unincorporated association as a non-party campaigner must be signed be signed by the body's secretary or a person who acts in a similar capacity in relation to the body.

You have signed the submitted form in the position of secretary for the unincorporated association. The form also states that Heather Rainey is the unincorporated association's secretary. **Could you please provide some further information about who is the correct secretary for the unincorporated association?**

If you are not the secretary or acting in a similar capacity for your organisation then the form may need to be resubmitted and signed by the correct person.

Next steps

If you intend to amend your notification please do so as soon as possible and no later than 20 April 2021. **Please let us know if you would like to amend your notification online.**

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

From: Max Young <[redacted]>
Sent: 13 April 2021 11:11
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Re: Not Recieved: TP1 Registration Confirmation

Dear [redacted]

Thank you for your reply.

It has now been sixteen days since I submitted the application to register.

I would be grateful if you could confirm that the registration will be completed soon.

Many thanks,

Max

On 9 Apr 2021, at 3:53 pm, Partyreg <Partyreg@electoralcommission.org.uk> wrote:

Dear Mr Young,

Thank you for your notification to register as a non-party campaigner, which we received on 29 March 2021.

We may write to you during the assessment process seeking further information from you about the notification.

Otherwise, we will contact you again once we have made a decision.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Max Young <[redacted]>
Sent: 09 April 2021 15:46
To: Partyreg <Partyreg@electoralcommission.org.uk>
Subject: Not Recieved: TP1 Registration Confirmation

Partyreg,

I hope you are well. On the 29th March I submitted a TP1 NPC registration form for the NPC "Young Unionists" to your Scotland office. [redacted] informed me that it had been passed on to you but I have not been sent a receipt of submission.

One of your colleagues at the Scotland office informed me on the phone yesterday that you would begin to process the registration, however I have still received nothing from you.

Could you confirm that the TP1 form is being processed by Partyreg and when might I expect registration to be completed?

Many thanks,

Max Young

Dear Mr Young

Thank you for your email dated 29 March 2021 which I have passed on to our Party Registration team.

Yours sincerely

[redacted]

www.electoralcommission.org.uk

From: Max Young <[redacted]>
Sent: 29 March 2021 17:23
To: Infoscotland <Infoscotland@electoralcommission.org.uk>
Subject: Young Unionists TP1 Registration

Electoral Commission in Scotland,

I would like to register the unincorporated association "Young Unionists" as a non-party campaigner in Scotland.

Attached is the completed TP1 registration form.

Please let me know if there is anything else you need.

Many thanks,

Maximilian Young

Dear [redacted]

Happy to confirm my authorisation and my role as Secretary.

Please let me know if you need anything else.

All the best,

John

On 21 Apr 2021, at 16:38, Partyreg wrote:

Dear Max,
Apologies for missing your call earlier and thank you for your email.
In order to proceed with the notification I will need positive confirmation from Mr John Gill that he is the responsible person for "Capitalist Worker". He can provide this by replying to this email stating his authorisation and his role within the unincorporated association.
Yours sincerely,
[redacted]
The Electoral Commission
electoralcommission.org.uk
From: Max Young
Sent: 21 April 2021 16:29
To: Partyreg
Subject: Re: Young Unionists - NPC notification
Dear [redacted]
Thank you for your email.
In this reply I am nominating a new person to be the responsible person for Capitalist Worker.
The details of this person are as follows:
Title: Mr
First Name(s): John
Surname: Gill
Address: [redacted]
Town: [redacted]
Postcode: [redacted]
E-Mail: [redacted]
Tel: [redacted]
Position held: Secretary
I hope this is all the information you need. Let me know as soon as possible if you need anything else.
With my removal as the responsible person for Capitalist Worker, Young Unionists should be ready to register now that all problems have been resolved.
Thank you for confirming on the phone on Monday that this application is a priority.
Regards,
Max Young

On Wed, Apr 21, 2021 at 1:16 PM Partyreg <Partyreg@electoralcommission.org.uk> wrote:

> Dear Mr Young,
> Thank you for your notification to register as a non-party campaigner, which we received on 29 March 2021. **Young Unionists** is not registered until we confirm this in writing.
> We have identified further matters that require your attention. We will put your notification on hold until 28 April 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).
> You now have an opportunity to address the following matters before the application is assessed in full.
> 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.
> Capitalist Worker
> You are listed as the responsible person for Capitalist Worker. An individual cannot be appointed as the responsible person for more than one registered non-party campaigner. Therefore, your appointment as responsible person for Young Unionists is not compatible with your appointment as responsible person for Capitalist Worker.
> This is because the notification to register Capitalist Worker as a NPC is still in force. Capitalist Worker's registration would ordinarily have lapsed on 18 February 2021. However, as you will be aware, a regulated period is currently in place for the Scottish and Welsh parliamentary elections taking place this year.
> As the deadline for renewal falls within this relevant regulated period, under the law the deadline is extended to polling day: 6 May 2021. Therefore, Capitalist Worker is still registered as a non-party campaigner until its registration lapses. You should be aware that there are no provisions for the voluntary de-registration of a NPC.
> **If you intend for Young Unionists to be a registered NPC, then you must either:**
>
> - **nominate a new person to be the responsible person for Young Unionists as stated in the notification to register**
> - **nominate a new person to be the responsible person for Capitalist Worker.**
>
> Please confirm which of the above actions you intend to take. We cannot proceed with your notification to register Young Unionists until this matter is resolved.
> **Next steps**
> If you intend to amend your notification please do so as soon as possible and no later than 28 April 2021. **Please let us know if you would like to amend your notification online.**
> 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

Dear John,

Apologies for the misunderstanding earlier. I have now processed the change of Capitalist Worker's responsible person from Mr Maximilian Young to Mr John Gill.

The changes should appear on the Capitalist Worker's entry on the register from tomorrow.

If you have any further questions please do not hesitate to ask.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

Dear Max Young,

Apologies for the misunderstanding. I have updated the details below to reflect the information set out in your email. I will send an email to John Gill with the information regarding the changes to Capitalist Worker.

Registration of Young Unionists

I write to inform you that we have processed and approved your notification to register Young Unionists as a non-party campaigner which was submitted on 29 March 2021 and considered complete on 21 April 2021. Your registration is in effect from 21 April 2021.

Please note, I have set you up as a user for the NPC on PEF Online. Shortly, you will receive an email from us with a temporary log in and password. Please check your junk mail for this email. Further information can be found on our website.

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 not 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/TP12834
(please allow a day for the entry to appear on the register)

	Post/Home address	Email	Telephone
Campaigner Headquarters	101 Rose Street South Lane Edinburgh EH2 3JG	[redacted]	[redacted]
Responsible person: [Maximilian Young]	-	[redacted]	[redacted]
Secretary: [Maximilian Young]	-	[redacted]	[redacted]
	• Maximilian Young • Heather Rainey		

Names of relevant participators:	

Guidance

You can find our general guidance for NPCs here and our guidance for the 2021 elections here. Below we have highlighted some specific guidance. If you have any questions about spending or reporting, please contact us at 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 a renewal notification 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 21 July 2022. 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

RECEIVED
14 OCT 2020

The Electoral Commission

#000061

Application to alter an entry in the register of political parties

Important: the accompanying explanatory notes should be read before completing this form.

1 Details of registered party

Name of registered party

BREXIT EXPRESS (BE)

Party reference

PP9050

2 Detail(s) to be amended on register entry

Please indicate which section(s) of this form are enclosed:	(tick as appropriate)
Change of party name	☑
Change to the parts of Great Britain in which party is registered	☐
Addition or removal of statement of intent to contest one or more elections to the European Parliament in the combined region	☐
Change of emblems	☐
Addition/removal of campaigns officer post	☐
Change of declaration by a minor party	☐

3 Fee

	(tick as appropriate)	
Cheque/postal order for the sum of £25 made payable to The Electoral Commission enclosed?	☑ Yes	☐ No

4 Signatures

Registered party leader

Signed [redacted] Date 09 dd 10 mm 2020 yyyy

Printed name JEREMY HOSKING

Registered nominating officer

Signed [redacted] Date 09 dd 10 mm 2020 yyyy

Printed name STEPHEN HAZELL SMITH

Registered treasurer

Signed [redacted] Date 09 dd 10 mm 2020 yyyy

Printed name DAVID BAILEY

Additional signature(s)

Other registered officer

Signed Date dd mm yyyy

Printed name

Position in party

Other officer of party

I declare that I am authorised to sign on behalf of: (name)

the party's registered: (position in party)

who is unable to sign this form because: (reason)

Signed

Date dd mm yyyy

Printed name

Position in party

Please return the form to:

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

Tel: 020 7271 0616
Fax: 020 7271 0505
E-mail: pef@electoralcommission.org.uk
Website: www.electoralcommission.org.uk

For Electoral Commission Use

Date received dd mm yyyy

Date checked dd mm yyyy

Checked by

Entered on database

Date entered dd mm yyyy

Entered by

Entered on website

Date entered dd mm yyyy

Entered by

5 Change of party name

The (name of party) BREXIT EXPRESS (BE)

wishes to change its registered name to the following:

English RECLAIM

Welsh

Irish

Other language

English translation

6 Part(s) of GB in which party is registered

The (name of party)

is applying to change the part or parts of Great Britain in which it is registered to the following:

(please tick all the parts in which the party wishes to be registered)

England ☐ Scotland ☐ Wales ☐

7 Addition or removal of statement concerning intent to contest European Parliament election in the combined regions

I declare that the (name of party)

(intends) (does not intend) **(delete as applicable)** to contest one or more elections to the European Parliament in the combined region.

8 Change of emblem(s)

The (name of party)

wishes to:

(please tick the boxes) that applies)

Register a new party emblem ☐ Remove a registered party emblem ☐

(tick as appropriate)

Copy of emblem(s) to be added and/or deleted enclosed on separate sheet(s)? ☐ Yes ☐ No

9 Addition or removal of campaigns officer post

The (name of party)

wishes to register as a party with a campaigns officer.

Name of proposed campaigns officer

Title | First name(s) | Surname

Home address

Town | County | Postcode

Signature of proposed campaigns officer

I declare that I accept the position of registered party campaigns officer and confirm that I have not been convicted of any offence in connection with a relevant election or referendum at any time in the past five years.

Signed | Date dd mm yyyy

Printed name

or

The (name of party)

wishes to withdraw its statement that it is a party with a registered campaigns officer.

(tick as appropriate)

Revised financial scheme enclosed? ☐ Yes ☐ No

10

A. Change of declaration by a minor party

The (name of party) _____

wishes to cancel its declaration that it will contest only parish elections in England and/or community elections in Wales, and to make the following declaration:

(delete the two declarations that do not apply)

a) I declare that the (name of party) _____

intends to contest one or more relevant elections in Northern Ireland and one or more such electons in Great Britain and is accordingly applying to be registered (as two separate parties) in both the Northern Ireland register and in the following part(s) of the Great Britain register:

(tick as appropriate)

England ☐ Scotland ☐ Wales ☐

b) I declare that the (name of party) _____

intends to contest one or more relevant elections in Great Britain (which will not be confined to parish (England) or community (Wales) elections) and is accordingly applying to be registered in the following part(s) of the Great Britain register only:

(tick as appropriate)

England ☐ Scotland ☐ Wales ☐

c) I declare that the (name of party) _____

intends to contest one or more relevant elections in Northern Ireland only and is accordingly applying to be registered in the Northern Ireland register only.

B. Financial details

Financial details submitted? (tick as appropriate) ☐ Yes ☐ No

C. Accounting units

Details of accounting units submitted on appendix A? (tick as appropriate) ☐ Yes ☐ No

D1. Party treasurer

Title | First name(s) | Surname

Home address

Town | County | Postcode

I declare that I accept the position of registered party treasurer and confirm that I have not been convicted of any offence in connection with a relevant election or referendum at any time in the past five years.

Signed | Date dd mm yyyy

Printed name

D2. Campaigns officer

Title | First name(s) | Surname

Home address

Town | County | Postcode

I declare that I accept the position of registered party campaigns officer and confirm that I have not been convicted of any offence in connection with a relevant election or referendum at any time in the past five years.

Signed | Date dd mm yyyy

Printed name

E. Constitution

(tick as appropriate)

Copy of party's constitution enclosed? ☐ Yes ☐ No

F. Financial scheme

(tick as appropriate)

Copy of party's draft financial scheme enclosed? ☐ Yes ☐ No

G. Accounting units (AUs)

You should only complete the following details about accounting units if your party allows its affiliated and constituent parties to manage their own finances separately from the central party.

Total number of AUs

(tick as appropriate)

Details of individual AUs submitted on Appendix A? ☐ Yes ☐ No

Appendix A
Details of accounting units – GB/NI register

Important: Please list AUs in alphabetical order within individual categories (e.g. constituency, women's sections and regional groups) and number sequentially (i.e. 1,2,3 etc.) in the boxes.

AU details (please use continuation sheets as necessary)

Name of AU

Type of AU

Address (party headquarters or for correspondence if no HQ)

Town | County | Postcode

Telephone number

Fax number

Email address

Name of AU treasurer

Title

First name(s) | Surname

Name of second registered officer

Title

First name(s) | Surname

Privacy Statement

We will only use the information you give us to support our statutory functions. We will look after your personal information securely and we will follow data protection legislation. We will not share your personal information, or the personal information you may provide on other people, to anyone else unless we have to by law.

The lawful basis to collect the information in this form is that it is necessary for us to perform tasks carried out in the public interest and to exercise official authority vested in the Electoral Commission as set out in the Political Parties, Elections and Referendums Act 2000, the Representation of the People Act 1983, associated regulations and other electoral legislation.

Some of the information collected in this form is classified as special category personal data. We process this for reason of substantial public interest, which has a basis in UK law. To process this type of information the Data Controller must have a relevant policy document that sets out how this information will be handled.

The Electoral Commission is the Data Controller and its Data Protection Officer is Jo Crofton-Diggins (dataprotection@electoralcommission.org.uk).

You can read our privacy notice at https://www.electoralcommission.org.uk/privacy-notice for information about how we process personal data.

The Electoral Commission

Application to alter an entry in the register of political parties

Important: the accompanying explanatory notes should be read before completing this form.

1 Details of registered party

Name of registered party

BREXIT EXPRESS

Party reference

[redacted]

2 Detail(s) to be amended on register entry

Please indicate which section(s) of this form are enclosed: (tick as appropriate)

Change of party name	☑
Change to the parts of Great Britain in which party is registered	☐
Addition or removal of statement of intent to contest one or more elections to the European Parliament in the combined region	☐
Change of emblems	☐
Addition/removal of campaigns officer post	☐
Change of declaration by a minor party	☐

3 Fee

Cheque/postal order for the sum of £25 made payable to The Electoral Commission enclosed? (tick as appropriate)

☑ Yes ☐ No

4 Signatures

Registered party leader

Signed [redacted]

Date 13 dd 11 mm 2020 yyyy

Printed name LAVRENCE FOX

Registered nominating officer

Signed [redacted]

Date 11 dd 11 mm 2020 yyyy

Printed name STEPHEN HAZELL-SMITH

Registered treasurer

Signed [redacted]

Date 5 dd 11 mm 2020 yyyy

Printed name DAVID BAILEY

Additional signature(s)

Other registered officer

Signed

Date dd mm yyyy

Printed name

Position in party

5 Change of party name

The (name of party) BREXIT EXPRES

wishes to change its registered name to the following:

English THE RECLAIM PARTY

Welsh

Irish

Other language

English translation

6 Part(s) of GB in which party is registered

The (name of party) BREXIT EXPRESS

is applying to change the part or parts of Great Britain in which it is registered to the following:

(please tick all the parts in which the party wishes to be registered)

England ☑ Scotland ☑ Wales ☑

7 Addition or removal of statement concerning intent to contest European Parliament election in the combined regions

I declare that the (name of party)

(intends) (does not intend) **(delete as applicable)** to contest one or more elections to the European Parliament in the combined region.

8 Change of emblem(s)

The (name of party)

wishes to:

(please tick the boxes) that applies)

Register a new party emblem ☐ Remove a registered party emblem ☐

(tick as appropriate)

Copy of emblem(s) to be added and/or deleted enclosed on separate sheet(s)? ☐ Yes ☑ No

Good afternoon Ewen,

I am writing to obtain confirmation of your spending at the United Kingdom Parliamentary general election (UKPGE) 2019.

You are required to complete a spending return if you spent above the registration threshold on regulated activity in any part of the UK during the regulated period that ran from 13 December 2018 to 12 December 2019. This is £20,000 in England, or £10,000 in either Scotland, Wales or Northern Ireland.

However, if you did not spend above these thresholds, you are not required to complete a spending return. If this is the case please let us know by responding to this email with the amount you spent.

If we do not hear from you and we obtain evidence that you spent over the threshold, you may be referred for enforcement action under our enforcement policy.

May we please have a response by COB 20 May 2020.

If you have any questions or need any support please let us know.

Kind Regards,

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

image003.png

[redacted]

[redacted]

[redacted]

[redacted]

From: Ewen Stewart [redacted]
Sent: 21 May 2020 17:15
To: [redacted]
Cc: [redacted]
Subject: Re: Action required: Reporting requirements following the United Kingdom Parliamentary general election 2019

Dear [redacted]

I sent 5 files on 11th March as follows
CPS invoices 1 file size 27140KB
CPS invoices 2 file size 574kb
CPS invoices 3 file size 6436kb
Electoral Commission spending return 2019 TP4 file size 5397KB
Electoral Commission return of donations march 2020 file size 12615 KB

so total files sent as one email were 52 16 MB which was large and it might be it got stuck in your fire wall?

I attach a copy the initial email was below on 11th March and as I got no acknowledgement of receipt I sent a subsequent email on March 12th as shown

I am can resend the files if they have not got through your fire wall but please advise how I can send safley a file of 52MB to you and I will endeavour to do so

Kind regards,

Ewen Stewart
Centre Point Strategies

---------- Forwarded message ---------
From: **Ewen Stewart** [redacted]
Date: Wed, 11 Mar 2020 at 10:28
Subject: Centre Point Strategies- City Action campaign submission to Electoral Commission for donations and spending
To: Partyreg <Partyreg@electoralcommission org uk>

Dear Sirs,

Please find enclosed our submission for spending and donations as a non party campaigner for the 2019 General Election

I attach the relevant forms outlining

1 donations

2 spending

3 three files outlining all invoices over £200 signed in a google drive file and also two seperate files below

Please confirm this is in order and receipt

Yours faithfully,

Ewen Stewart

Director, Centre Point Strategies

and then on 12th

Dear Ewen,

Thank you for your email confirming that City Action (Centre-point Strategies) spent over the reporting threshold and that you will submit the spending return on or before 12 March 2020.

Kind regards,

[redacted]

From: Ewen Stewart <[redacted]
Sent: 19 February 2020 12:05
To: [redacted]
Subject: Re: Important information: NPC reporting reminder CCM:0336066

Dear [redacted]

Thank you for your email. Our spending was well under £250000 so we will report to you by 12th March as requested.

Please do not hesitate to contact me should you need any further clarification.

Kind regards,

Ewen Stewart

On Mon, 17 Feb 2020 at 15:52, [redacted] wrote:

> Dear Mr Stewart,
>
> I am writing to explain your spending and donations reporting responsibilities as a registered non-party campaigner following the United Kingdom Parliamentary general election (UKPGE) 2019.
>
> **Do I need to complete a spending return?**
>
> You must complete a spending return if you spent above the registration threshold on regulated activity in any part of the UK during the regulated period that ran from 13 December 2018 to 12 December 2019. This is £20,000 in England, or £10,000 in either Scotland, Wales or Northern Ireland.
>
> **Action: If you did not spend above these thresholds, you do not need to complete a spending return, but should let us know by return email that this is the case confirming the amount you spent. Please respond by Friday 28 February.**
>
> **Action: If you did spend above any of the registration thresholds, you must report your spending and donations to us in full not later than:**
>
> - **12 March 2020 if total spending was £250,000 or under**
> - **12 June 2020 if total spending was over £250,000**

NPC's with a total spend of over £250,000 must also submit an independent auditors report.

Action: Please confirm, in your response to this email, whether or not your total spend is over £250,000. Please confirm this by Friday 28 February.

Failure to submit a complete return by the statutory deadline will be dealt with in line with the Commission's published Enforcement Policy.

How do I complete my return?

There are three methods by which you can complete the return:

- using our online database PEF Online
- by email - one form each for spending (form / explanatory notes) and donations (form / explanatory notes)
- on paper – one form each for spending and donations using the same forms as above

Please note that you must download the forms to your PC in the first instance in order to view their content.

Our email system will reject files larger than 7MB. If this is an issue, contact us to discuss an alternative.

What does my return need to include?

You must submit:

- A statement of all payments made including payments, notional expenditure, unpaid expenses and disputed claims
- Invoices for payments over £200
- A donation report, including details of:
    - all impermissible donations
    - all accepted donations over £7,500
    - all accepted donations that add up to over £7,500 from the same donor
    - the total of all other accepted donations that were worth more than £500 and less than or equal to £7,500. You do not need to provide details of these donations, just the total figure
- A declaration by the responsible person

The European Parliamentary elections took place during the regulated period for the UKPGE. This means that all general non-party campaign spending in the local government elections and for the European Parliamentary Elections will be counted against the spending limit for the UKPGE.

What do we publish?

After receipt of your return we publish it. Your return is the document that we receive/hold on the due date for returns. This is the document on which we undertake compliance checks and is the basis of any necessary enforcement action.

If we believe the return is inaccurate you may in some instances have the opportunity to amend it later but this will not alter the fact that the version delivered might lead to enforcement action. In other cases it may be published in the form in which it is submitted to us. You should therefore ensure it is accurate and invoices are easily referenced. We have attached a sheet of practical tips to assist you to make sure your return is correct

Do I need to submit a statement of accounts?

Certain organisations registered with us as a non-party campaigner must send us a statement of accounts following a UK Parliamentary general election.

The accounts must be submitted within 9 months of the election if your total campaign spending was £250,000 or less or within 12 months of the election if your total spending is over £250,000.

Some NPC's will be exempt from submitting accounts. You will be exempt from submitting a statement of accounts to us if:

- You are already legally required to submit a statement of accounts that we are able to inspect; and

- That statement of accounts contains the following information:
    - an income and expenditure account for the regulated period
    - a balance sheet, showing assets and liabilities of the organisation as at the end of the regulated period

Further information on how to complete a statement of accounts can be found here in our Overview of NPC Accounts.

What resources are available to help?

We have produced a suite of guidance documents on the rules that apply to non-party campaigners, and on how to complete your paperwork.

We are here to help, so if on reading the documents, you have further questions, please don't hesitate to contact us at pef@electoralcommission.org.uk.

Kind regards,

[redacted]

[redacted]

The Electoral Commission

[redacted]

electoralcommission.org.uk

Dear Mr Stewart,

Please ignore the information in the previous email. Information regarding your non-party campaigner annual renewal for 2021 can be found below.

Non-party campaigner annual renewal due to be delivered
In order to remain registered as a non-party campaigner, each year Centre Point Strategies Ltd. must submit a renewal notification to us.

As the relevant signatory, you are responsible in law for delivering this notification. To allow time to resolve any issues with processing your notification we recommend that you do this as soon as possible. The deadline for delivering your notification is 18 February 2021. This deadline falls within the regulated period for the Scottish and Welsh parliamentary elections which runs from 6 January 2021 to 06 May 2021. If you are due to deliver returns for these elections, then the renewal deadline is extended to 6 May.

However, if you are not due to make a return then the deadline remains as **18 February 2021**

If we do not receive a complete notification that complies with the requirements outlined in the Political Parties, Elections and Referendums Act 2000 (PPERA) by the deadline, we are required in law to remove the campaigner from the register. This is not a discretionary decision by us.

Do you need to remain registered?
Before submitting a renewal, you should consider whether you need to remain registered at this time. Non-party campaigners are only required to register with us if they spend, or plan to spend, more than £20,000 in England or £10,000 in any of Scotland, Wales or Northern Ireland on 'regulated campaign activity' during a regulated period. You do not need to be registered if you are campaigning outside a regulated period. Please note that should a campaigner's registration lapse and they need to be registered in future, a fresh notification to register can be submitted to us at that time.

What you need to do to remain registered

Please submit the notification **by email, you can find the relevant TP3 form on** our website.
You can send a scanned copy by email to partyreg@electoralcommission.org.uk

Our COVID-19 arrangements
Ordinarily, we would accept notifications delivered to us either through our PEF Online system or by post. However, under the current COVID-19 arrangements, our office building is closed until further notice and all staff are working remotely.

This means that if you send any correspondence to us by post then it is at risk of not being received, and we may consider that you have not fulfilled your statutory obligation.

Please submit your notification online if possible. **If you need to submit by post then please get in touch so that we can make the necessary arrangements.**

Please ensure you read the instructions carefully to ensure the notification of renewal is completed correctly. In particular, if any of the campaigner's registered details have changed then you must amend these.

We aim to tell you about the outcome of your application within six weeks. If we don't receive a complete application that complies with PPERA by the deadline, we are required by law to remove a campaigner from the register.

If you need more information view our guidance on non-party campaigns or contact us.

Yours sincerely,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: Partyreg
Sent: 02 February 2021 10:56
To: [redacted]
Subject: Centre Point Strategies Ltd - RESPOND NOW TO REMAIN REGISTERED CCM:0553133

Dear Mr Stewart,

Non-party campaigner annual renewal due to be delivered
In order to remain registered as a non-party campaigner, each year Centre Point Strategies Ltd must submit a renewal notification to us.

As the relevant signatory, you are responsible in law for delivering this notification. To allow time to resolve any issues with processing your notification we recommend that you do this as soon as possible. The deadline for delivering your notification is 18 February 2021.

If we do not receive a complete notification that complies with the requirements outlined in the Political Parties, Elections and Referendums Act 2000 (PPERA) by the deadline, we are required in law to remove the campaigner from the register. This is not a discretionary decision by us.

Do you need to remain registered?
Before submitting a renewal, you should consider whether you need to remain registered at this time. Non-party campaigners are only required to register with us if they spend, or plan to spend, more than £20,000 in England or £10,000 in any of Scotland, Wales or Northern Ireland on 'regulated campaign activity' during a regulated period. You do not need to be registered if you are campaigning outside a regulated period. There is no regulated period in

operation in 2020 Please note that should a campaigner's registration lapse and they need to be registered in future, a fresh notification to register can be submitted to us at that time.

What you need to do to remain registered
The easiest way is to respond is on **PEF online**.



Should you prefer to submit the notification **by email you can find the relevant TP3 form on** our website.

You can send a scanned copy by email to partyreg@electoralcommission.org.uk

Our COVID-19 arrangements
Ordinarily, we would accept notifications delivered to us either through our PEF Online system or by post. However, under the current COVID-19 arrangements, our office building is closed until further notice and all staff are working remotely.

This means that if you send any correspondence to us by post then it is at risk of not being received, and we may consider that you have not fulfilled your statutory obligation.

Please submit your notification online if possible. **If you need to submit by post then please get in touch so that we can make the necessary arrangements.**

Please ensure you read the instructions carefully to ensure the notification of renewal is completed correctly. In particular, if any of the campaigner's registered details have changed then you must amend these.

We aim to tell you about the outcome of your application within six weeks. If we don't receive a complete application that complies with PPERA by the deadline, we are required by law to remove a campaigner from the register.

If you need more information view our guidance on non-party campaigns or contact us.

Yours sincerely,

[redacted]

The Electoral Commission

electoralcommission.org.uk