[redacted]

From: FOI
Sent: 19 July 2021 10:29
To: [redacted]
Subject: FOI 090-21 - Response

Dear [redacted],

Our Ref: FOI-090-21

Thank you for your request under the Freedom of Information Act dated 25 May 2021, made via the Electoral Commission's Party Registration Team.

The Commission aims to respond to requests for information promptly and has done so within the statutory timeframe (20 working days, with an extension of a further 20 working days owing to our consideration exemptions and the Public Interest test).

Your request, which relates to three separate registration decisions, is shown below followed by our response.

Request 1: Request relating to the refusal of the application to change the party name from Alliance EPP UK to 'Alliance 4 Freedoms:

- *Please name all officers involved in this decision. Further, please regards this email as an FOI request for all matters relating to the application rejected by your email.*

Request 2: Request relating to the granting of the application to register the party name Alliance for Europe:

- *Please disclose all information, including names of officials, in the authorising of the party name 'Alliance for Europe'.*

Request 3: Request relating to the refusal of the application to change the party name from Both Unions Party to Alliance 4 Freedoms:

- *Please by return name all officers involved in this decision and explain the delay between deleting the application from your website and our getting your email. Further, please regards this email as an FOI request for all matters relating to the application rejected by your email.*

Our Response:

We hold the information you have requested. We are releasing some of the information to you. However, we consider some of it is exempt from release, as explained at the end of this email.

Please note that the following part of request 3 is not a request for information but a request for explanation and is accordingly not a request under the Freedom of Information Act 2000:

"*…explain the delay between deleting the application from your website and our getting your email.*"

However, we have provided some explanation later in this correspondence in response to request 3 in order to be helpful.

All registration applications are assessed by the Registration Team against the Political Parties, Elections, Referendums Act (2000) PPERA and put to our internal Approvals Board. That Board is made up of senior officers within the Commission. It was previously chaired by the Director of Political Finance & Regulation and Legal Counsel, Bob Posner. As Director of Regulation, the internal Approvals Board is now chaired by Louise Edwards.

Request 1: Request relating to the refusal of the application to change the party name from Alliance EPP UK to 'Alliance 4 Freedoms

Below is the information we are releasing in response to your request for the names of the officers involved in the decision on this application. You will note that in some cases we have not released the name of an individual as in our view it is exempt from disclosure. Please see the exemption under section 40, below.

Below is the Approval Board as it was at the time of the decision on the application:

- Bob Posner, Director of Political Finance & Regulation, and Legal Counsel
- Louise Edwards, Head of Regulation
- Tom Hawthorn, Head of Policy
- Ben Wilkinson, Head of Communications
- Andy O'Neil, Head of Electoral Commission Scotland
- Ann Watt, Head of Electoral Commission Northern Ireland
- Rhydian Thomas, Head of Electoral Commission Wales
- Senior Lawyer

We have also released the assessment document which contains the consideration and decision in relation to the application.

Request 2: Request relating to the granting of the application to register the party name Alliance for Europe

Below is the information we are releasing in response to your request for the names of the officers involved in the decision on this application. You will note that in some cases we have not released the name of an individual, as in our view it is exempt from disclosure. Please see the exemption under section 40, below.

Below is the Approval Board as it was at the time of the decision on the application:

- Bob Posner, Director of Political Finance & Regulation, and Legal Counsel
- Louise Edwards, Head of Regulation
- Tom Hawthorn, Head of Policy
- Warren Seddon, Head of Communications
- Andy O'Neil, Head of Electoral Commission Scotland
- Ann Watt, Head of Electoral Commission Northern Ireland
- Senior Lawyer

We have also released the assessment document which contains the consideration and decision in relation to the application.

Request 3: Request relating to the refusal of the application to change the party name from Both Unions Party to Alliance 4 Freedoms

We removed the party's details from the website shortly after a final decision was made. The short delay in processing the decision and notifying the party was due to clarification being sought for the decision on the party's emblem.

Below is the information we are releasing in response to your request for the names of the officers involved in the decision on this application.

Below is the Approval Board as it was at the time of the decision on the application:

- Louise Edwards, Director of Regulation
- Tom Hawthorn, Head of Policy
- Niki Nixon, Head of Communications
- Andy O'Neil, Head of Electoral Commission Scotland
- Rhydian Thomas, Head of Electoral Commission Wales
- Cahir Hughes, Head of Electoral Commission Northern Ireland
- Majella La Praik, Head of Registration and Reporting

We have also released:

- the assessment document which contains the consideration and decision in relation to the application
- an email relating to the translation of the proposed name and identity marks in line with fulfilling our obligation under the Welsh Language Measures
- an email seeking clarification on the final decision

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' (sent to the inbox of [redacted]). This notification will contain a link to enable you to start accessing your information. Please find below details on how to 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 090-21'.
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 **19 August 2021.**

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

Application of this exemption is subject to the public interest test.

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 our registration process 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 also lies in enabling the Commission to obtain confidential legal advice in order to make registration decisions based on a firm legal basis. A client's ability to speak freely and frankly with their legal adviser in order to obtain appropriate legal advice is a fundamental requirement of the English legal system. The concept of legal professional privilege protects the confidentiality of communications between a lawyer and client and safeguarding openness in those communications ensures access to full and frank legal advice.

Having carefully weighed the public interest relating to possible disclosure of the information requested under s 42(1), we are satisfied that it is not appropriate at this time to disclose the information that the Commission holds, given in particular that the general public interest inherent in applying the exemption will always be strong, and that the information concerns matters that are of ongoing relevance.

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

Some of the information contained in the requested information falls within the description of personal data because the information relates directly to an identifiable living individual. Disclosure of this information would breach the first data protection principle, which states the information must be processed fairly and lawfully. Any personal data that is not already in the public domain has been redacted. Under this provision, we have also redacted the names of Commission staff that are not or have not been part of our Senior Leadership Group. This is because those members of staff have a reasonable expectation that their personal details will not be made public.

Exemption under section 21:
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 requests one and three, we hold information in the scope of this request which is correspondence between Commission staff and the party. We consider this correspondence reasonably accessible to you by other means.

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

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

Application summary

PR 16/26 – 12 August 2016

The following table summarises the applications received by the Commission and the registration team's recommendations

Table 1: Director of Party and Election Finance and Legal Counsel delegated party registration decisions

Party name and proposed party identity marks (link to assessment note)	Registration team assessment
Alliance for Europe **Proposed party name:** Alliance for Europe / Cynghrair dros Ewrop **Proposed descriptions:** 1. Alliance for Europe in Wales / Cynghrair dros Ewrop yng Nghymru 2. The Alliance for Europe Candidate 3. Globalisation not isolation	• New party • All of GB application complete 10 August 2016 • Public comments close 24 August • Recommendation to approve all **Initial view** BP 14.8.2016: I am minded to approve the new party [name] and four descriptions applied for. **Approval Board Comments** WS: Agree to approve. RT: agree to approve LE: I agree with the recommendation to approve all [redacted] Agree to approve AON: Agree to approve. TH: I agree with the recommendation to approve the proposed name and three descriptions. AW: agree to approve **Final Decision** BP 24.8.2016: Approve the new party [name] and four descriptions [redacted]

Alliance for Europe

Application to register a new party

Political objectives/party information

- Aims and objectives of the party:
  - To preserve, strengthen and develop Britain's place in Europe, in European Union and on the Structural Council of Europe, championing the rights of citizens, free speech and integration in a modern multicultural society
  - To that end to win all seats in Parliament, currently held by Leave MPs.
  - To organize any legal and democratic activity which will publicize and further these aims, including a second Referendum on terms achieved in negotiations.
  - To provide absolute transparency in all its operations and to work towards achieving its aims in Government.
- There is currently no online presence for this party. They have provided a website but it has no content.
- The party is intending to stand candidates throughout GB
- Application, constitution, financial scheme

Recommendation

The issues of concern relating to the statutory tests are set out in Appendixes A and B below. I have set out how the following identifiers meet the statutory tests.

In determining my opinion I am required to consider whether the proposed party identifiers (names, descriptions and emblems) meet the statutory tests as set out in the Political Parties, Elections, and Referendums Act 2000. Except where indicated in Appendixes A and B I considered all of the proposed party identifiers below to have met the following the statutory tests.

That the name and descriptions are:

- Not the same as that of a currently-registered party identity mark
- Not likely to result in voters confusing it with a registered political party
- Not more than 6 words
- Not, in my opinion, obscene or offensive
- Doesn't contain words the publication of which would be likely to amount to the commission of an offence
- If a name or description doesn't include any script other than Roman script
- Does not contain any words prohibited by order of the secretary of state
- Is not likely to mislead voters as to the effect of their vote
- Is not likely to contradict or hinder instructions or guidance given for voting.

I recommend that the following identity marks be **approved** and entered onto the register of political parties in Great Britain.

- Alliance for Europe / Cynghrair dros Ewrop
- Alliance for Europe in Wales / Cynghrair dros Ewrop yng Nghymru
- The Alliance for Europe Candidate
- Globalisation not isolation
-

[redacted]
12 August 2016

A summary of the searches for similarity are included in Appendix C.

Appendix A: Proposed Name

Table A1

Proposed name and recommendation	Registration team assessment
Alliance for Europe / Cynghrair dros Ewrop Recommendation: Approve	1.1 In making my recommendation to approve the proposed party name I have considered the following issues 1.2 After searching the register, both current identity marks and those protected after deregistration, I concluded that there are other no party identity marks that this proposed name is confusingly similar with. 1.3 The identity marks that contained the same word/words were: • 'Alliance EPP: European People's Party UK'[1] • 'Alliance for London'[2] 1.4 All the key words of the proposed name are also in the 'Alliance EPP: European People's Party UK'. However, the registered name includes a number of other elements which makes them unlikely to be confusingly similar. 1.5 I also considered whether it was likely that the proposed name would be confusing with 'Alliance for London'.

[1] A party name
[2] A party name

	1.6 Both of these party names begin in the same way. There is a possibility that voters could consider one or the other as a branch of the other. 1.7 I do not however think this is likely. Both of the differentiating words are very different and are not obviously connected. 1.8 There are also another number of other parties that begin 'Alliance for'[3]. 1.9 There is precedent then for allowing 'Alliance for' names. I would therefore not consider this confusing. 1.10 I did not consider the name offensive or misleading. 1.11 I recommend approving this party name.

[3] 'Alliance for Green Socialism', 'Alliance for Britain's 4 Freedoms Future' etc.

Appendix B: Proposed descriptions

Table B1

Proposed descriptions and recommendation	Registration team assessment
Alliance for Europe in Wales / Cynghrair gyfer Ewrop yng Recommendation: Approve	2.1 In making my recommendation to approve party identity mark I have considered the following issues 2.2 After searching the register, both current identity marks and those protected after deregistration, I concluded that there are other no party identity marks that this proposed description is confusingly similar with. 2.3 The identity marks that contained the same word/words were: • 'Alliance EPP: European People's Party UK'[4] • 'Alliance for London'[5] 2.4 Two of the key words of the proposed name are also in the 'Alliance EPP: European People's Party UK'. However, the registered name includes a number of other elements which makes them unlikely to be confusingly similar. 2.5 I also considered whether it was likely that the proposed would

[4] A party name
[5] A party name

	be confusing with ‘Alliance for London’. 2.6 Both of these party names begin in the same way. There is a possibility that voters could consider one or the other as a branch of the other. 2.7 I do not however think this is likely. Both of the differentiating words are very different and are not obviously connected. 2.8 There are also another number of other parties that begin ‘Alliance for’ . 2.9 There is precedent then for allowing ‘Alliance for’ names. I would therefore not consider this confusing. 2.10 I did not consider the name offensive or misleading. 2.11 Wales is a prohibited word. It can only be used if the description does not include the name of an existing registered party, or the word party. ‘Alliance for Europe in’ is not a registered party. 2.12 I recommend approving this party name.
The Alliance for Europe Candidate Recommendation: Approve	2.1 In making my recommendation to approve the proposed party name I have considered the following issues 2.2 After searching the register, both current identity marks and those protected after deregistration, I concluded that there are other no party identity marks that this proposed name is

	confusingly similar with. 2.3 The identity marks that contained the same word/words were: • 'Alliance EPP: European People's Party UK'[6] • 'Alliance for London'[7] 2.4 Two of the key words of the proposed name are also in the 'Alliance EPP: European People's Party UK'. However, the registered name includes a number of other elements which makes them unlikely to be confusingly similar. 2.5 I also considered whether it was likely that the proposed would be confusing with 'Alliance for London'. 2.6 Both of these party names begin in the same way. There is a possibility that voters could consider one or the other as a branch of the other. 2.7 I do not however think this is likely. Both of the differentiating words are very different and are not obviously connected. They also use geographic names which we consider to provide substantial points of difference 2.8 There are also another number of other parties that begin 'Alliance for' . 2.9 There is precedent then for allowing 'Alliance for' names. I

[6] A party name
[7] A party name

	would therefore not consider this confusing. 2.10 I did not consider the name offensive or misleading. 2.11 I recommend approving this party name.
Globalisation not isolation Recommendation: Approve	2.12 In making my recommendation to approve party identity mark I have considered the following issues 2.13 After searching the register, both current identity marks and those protected after deregistration, I concluded that there are other no party identity marks that this proposed description is confusingly similar with. 2.14 The identity marks that contained the same word/words were: • 'The Globelization Liberation Dream Party '[8] 2.15 None of the above party identity marks are confusingly similar or likely to mislead a voter. 2.16 The word 'Isolation' does not appear on the register. 2.17 This description is not offensive. 2.18 I recommend approving this description.

[8] A party name

Appendix C – Searches for the same or similar names and descriptions

Table C1: Similarity score results

The following table lists those identifiers that were found to be similar to by an electronic matching process. The higher the value the higher the similarity between the proposed descriptions and the identifier listed below.

Proposed identity marks	Similar identifiers	Party Name of similar identifiers (if the same indicates the similar identifier is a party name)	Similarity
Alliance for Europe	Alliance EPP: European Peopleâ€™s Party UK	Alliance EPP: European Peopleâ€™s Party UK	0.6630
	for a socialist Europe	Left Unity	0.5869
	For real change in Europe	Conservative and Unionist Party	0.5651
	Strong Voice for Scotland in Europe	Scottish National Party (SNP)	0.5574
	Working for a peaceful prosperous Europe	Common Good	0.5560
	Working for Less Europe More Britain	We Demand A Referendum Now	0.5558
	Together for a peaceful prosperous Europe	Common Good	0.5531
Alliance for Europe in Wales	Liberal Party In Wales	The Liberal Party	0.5590
	For real change in Europe	Conservative and Unionist Party	0.5390

Proposed identity marks	Similar identifiers	Party Name of similar identifiers (if the same indicates the similar identifier is a party name)	Similarity
	Strong Voice for Scotland in Europe	Scottish National Party (SNP)	0.5299
The Alliance for Europe Candidate	The Independents Alliance Candidate	The Independents Alliance	0.7514
	The Independents Alliance	The Independents Alliance	0.6629

Tables C2 Party identity marks that contain words that appear in the proposed identity marks

Party names and descriptions that contain the word 'Alliance'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
People Before Profit Alliance	People Before Profit Alliance
Bournemouth Independent Alliance	Bournemouth Independent Alliance
Alliance for London	Alliance for London
The Independents Alliance	The Independents Alliance
East Devon Alliance	East Devon Alliance
Motorcycle Alliance	Motorcycle Alliance
Christian Peoples Alliance	Christian Peoples Alliance
Alliance EPP: European Peopleâ€™s Party UK	Alliance EPP: European Peopleâ€™s Party UK
Scottish Democratic Alliance	Scottish Democratic Alliance
Alliance For Green Socialism	Alliance For Green Socialism
Alliance - Alliance Party of Northern Ireland	Alliance - Alliance Party of Northern Ireland
UK Yorkshire Socialist Alliance Party	UK Yorkshire Socialist Alliance Party
The Independent Political Alliance Party	The Independent Political Alliance Party

Party names and descriptions that contain the word 'Alliance'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Stapleford Alliance	Stapleford Alliance
Socialist Alliance	Socialist Alliance
Moorlands Democratic Alliance	Moorlands Democratic Alliance
Equal Parenting Alliance	Equal Parenting Alliance
Deep Earth Ecosphere Preservation Alliance	Deep Earth Ecosphere Preservation Alliance
Alliance	Alliance - Alliance Party of Northern Ireland
Alliance for Britainâ€™s 4 Freedoms Future	Alliance EPP: European Peopleâ€™s Party UK
Alliance for Green Socialism - Save Homes	Alliance For Green Socialism
Alliance For Green Socialism - Save NHS	Alliance For Green Socialism
Alliance For Green Socialism - Save Schools	Alliance For Green Socialism
Alliance of East Devon Independents	East Devon Alliance
Alliance Party	Alliance - Alliance Party of Northern Ireland
Alliance Party - Shared Future	Alliance - Alliance Party of Northern Ireland
Alliance Party First Candidate	Alliance - Alliance Party of Northern Ireland
Alliance Party of Northern Ireland	Alliance - Alliance Party of Northern Ireland
Alliance Party Second Candidate	Alliance - Alliance Party of Northern Ireland
Alliance Party Third Candidate	Alliance - Alliance Party of Northern Ireland
Alliance Works - Tribal Politics Doesn't	Alliance - Alliance Party of Northern Ireland
Anti-Corruption Pro-Family Christian Alliance	War Veteran's Pro-Traditional Family Party
Bournemouth Independent Alliance	Bournemouth Independent Alliance
Christian Peoples Alliance - Cynghrair Pobl Gristnogol	Christian Peoples Alliance
Christian Peoples Alliance - Supporting Traditional Marriage	Christian Peoples Alliance
Cross-Community Alliance Party	Alliance - Alliance Party of Northern Ireland
East Devon Alliance of Independents	East Devon Alliance

Party names and descriptions that contain the word 'Alliance'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
East Devon Alliance: Working for you	East Devon Alliance
East Devon Independent Alliance	East Devon Alliance
Freedom Alliance	Motorcycle Alliance
Freedom of Movement Alliance	Motorcycle Alliance
Independent East Devon Alliance	East Devon Alliance
Left Green Alliance	Alliance For Green Socialism
Liberal Alliance Party	Alliance - Alliance Party of Northern Ireland
Motor Alliance	Motorcycle Alliance
Motorcycle Alliance	Motorcycle Alliance
Motorcycle Freedom Alliance	Motorcycle Alliance
Motoring Alliance	Motorcycle Alliance
People Before Profit Alliance	People Before Profit Alliance
Populist Alliance	Populist Party
Respect (George Galloway) â€“ Anti Cuts Alliance	The Respect Party
Scotland's Left Alliance	RISE - Respect, Independence, Socialism and Environmentalism
The Alliance Party	Alliance - Alliance Party of Northern Ireland
The Alliance Party of Northern Ireland	Alliance - Alliance Party of Northern Ireland
The Independents Alliance Candidate	The Independents Alliance

Party names and descriptions that contain the word 'Europe'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Alliance EPP: European Peopleâ€™s Party UK	Alliance EPP: European Peopleâ€™s Party UK

Party names and descriptions that contain the word 'Europe'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Independence from Europe	Independence from Europe
Yes 2 Europe	Yes 2 Europe
The European Citizens Party	The European Citizens Party
Europeans Party	Europeans Party
A modern, civilised, multicultural European Britain	Equal and Just Society
A peaceful prosperous Europe including Britain	Common Good
Abolish Assembly and leave European Union	Independence from Europe
Britainâ€™s future in Europe: 4 Freedoms	Alliance EPP: European Peopleâ€™s Party UK
EPP: European Peopleâ€™s Party	Alliance EPP: European Peopleâ€™s Party UK
Europe Needs Us	Common Good
Europe's Leading City Europe's Leading Party	Alliance EPP: European Peopleâ€™s Party UK
Europe's Leading Party Believes in London	Alliance EPP: European Peopleâ€™s Party UK
European Green Party	Green Party
for a socialist Europe	Left Unity
For real change in Europe	Conservative and Unionist Party
Giving Scotland a Voice in Europe	Scottish National Party (SNP)
In: peace and prosperity throughout Europe	Common Good
Less Europe More Britain	We Demand A Referendum Now
London's Future with Europe's Leading Party	Alliance EPP: European Peopleâ€™s Party UK
London's Voice in Europe's Leading Party	Alliance EPP: European Peopleâ€™s Party UK
Say no to European Union	UK Independence Party (UKIP)
Scotland's Team in Europe	Scottish National Party (SNP)
Strong Voice for Scotland in Europe	Scottish National Party (SNP)
Together for a peaceful prosperous Europe	Common Good
Vote No to European Union Membership	We Demand A Referendum Now
Welsh Sovereignty From Westminster And Europe	Cymru Sovereign

Party names and descriptions that contain the word 'Europe'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Working for a peaceful prosperous Europe	Common Good
Working for Less Europe More Britain	We Demand A Referendum Now

Party names and descriptions that contain the word 'Wales'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Because we can make Wales better	British National Party
Plaid Cymru - The Party of Wales	Plaid Cymru - The Party of Wales
A Sovereign Wales In The World	Cymru Sovereign
Because we can make Wales better	British National Party
Britain Our Island, Wales Our Country	Cymru Sovereign
Christian Party (Wales)	Christian Party "Proclaiming Christ's Lordship"
Constitutional Patriot Party Of Wales	Cymru Sovereign
For A Sovereign State Of Wales	Cymru Sovereign
Liberal Party In Wales	The Liberal Party
Not Anti Anyone, Just Pro Wales	Cymru Sovereign
People First - Fighting for Wales	People First - Gwerin Gyntaf
People First - Putting Wales First	People First - Gwerin Gyntaf
Plaid Cymru - For All of Wales	Plaid Cymru - The Party of Wales
Plaid Cymru - North Wales Voice	Plaid Cymru - The Party of Wales
Plaid Cymru - The Party of Wales	Plaid Cymru - The Party of Wales
Plaid Cymru: For North Wales	Plaid Cymru - The Party of Wales
Republican Socialist (Wales)	The Republican Socialist Party
Sovereign Wales	Cymru Sovereign
UK Independence Party Wales	UK Independence Party (UKIP)
UKIP Wales	UK Independence Party (UKIP)
Wales Communist Party	Communist Party of Britain

Party names and descriptions that contain the word 'Wales'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Wales Free From Westminster and Brussels	Cymru Sovereign
Wales Green Party	Green Party
Wales Independent Network	Independent Network

Party names and descriptions that contain the word 'Candidate'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Community Candidate Party	Community Candidate Party
Alliance Party First Candidate	Alliance - Alliance Party of Northern Ireland
Alliance Party Second Candidate	Alliance - Alliance Party of Northern Ireland
Alliance Party Third Candidate	Alliance - Alliance Party of Northern Ireland
An Independents at Swansea official candidate	Independents @ Swansea
An Independents@Swansea official candidate	Independents @ Swansea
An official Independents at Swansea candidate	Independents @ Swansea
An official Independents@Swansea candidate	Independents @ Swansea
Blue Party Candidate	The Blue Party
Candidate for the Moderate Group	The Moderate Group
Cannabis is Safer than Alcohol Candidate	Cannabis is Safer than Alcohol
Carlisle Socialist and Trade Union Candidate	Trade Unionist and Socialist Coalition
Co-operative Party Candidate	Co-operative Party
College Ward Residents Association Candidate	Residents Associations of Epsom and Ewell
Competency Standards for Election Candidates	Scottish Democratic Alliance
Conservative Party Candidate	Conservative and Unionist Party
Democratic Republican Party Candidate	Democratic Republican Party
East Wycombe Independent Candidate	East Wycombe Independent Party

Party names and descriptions that contain the word 'Candidate'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Ewell Village Residents Association Candidate	Residents Associations of Epsom and Ewell
Freedom Party Candidate	Freedom Party
Green Party candidate	Green Party
Green Party first choice candidate	Green Party
Green Party lead candidate	Green Party
Green Party second choice candidate	Green Party
Green Party third choice candidate	Green Party
Independent Blythe Ward Residents Association Candidate	Solihull and Meriden Residents Association
Independent Candidate for Bowerdean	East Wycombe Independent Party
Independent Candidate for Micklefield	East Wycombe Independent Party
Independent Candidate for Totteridge	East Wycombe Independent Party
Independent Candidate for your community	East Wycombe Independent Party
Independent Labour Group, Harrow First Candidate	Independent Labour Group
Independent Shirley Residents Association Candidate	Solihull and Meriden Residents Association
Independent Solihull Ratepayers Association Candidate	Solihull and Meriden Residents Association
Independent Solihull Residents Association Candidate	Solihull and Meriden Residents Association
Labour Party Candidate	Labour Party
Liberal Party - Steve Radford's Candidate	The Liberal Party
Liberal Party Candidate And Local Resident	The Liberal Party
Local Community Candidate	Newcastle upon Tyne Community First Party
New Dawn Party - British Candidate	New Dawn
New Dawn Party - Community Candidate	New Dawn
New Dawn Party - Community Candidate	New Dawn
New Dawn Party - Irish Candidate	New Dawn
New Dawn Party - Local Candidate	New Dawn
New Dawn Party - Local Candidate	New Dawn

Party names and descriptions that contain the word 'Candidate'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
New Dawn Party - Northern Irish Candidate	New Dawn
New Dawn Party Candidate	New Dawn
New Dawn Party Candidate	New Dawn
Nonsuch Independent Residents' Association Candidate	Residents Associations of Epsom and Ewell
Nonsuch Residents' Association Candidate	Residents Associations of Epsom and Ewell
Official Pirate Party Candidate	Pirate Party UK
Official Pirate Party UK Candidate	Pirate Party UK
Official Scottish Pirate Party Candidate	Pirate Party UK
People First Candidate	People First - Gwerin Gyntaf
Prerogatives Party Candidate	Prerogatives Party
Scottish Co-operative Party Candidate	Co-operative Party
Scottish Labour Party Candidate	Labour Party
The Blue Party Candidate	The Blue Party
The Change Party Candidate	The Change Party
The Co-operative Party Candidate	Co-operative Party
The Communist Party Candidate	Communist Party of Britain
The Conservative Party Candidate	Conservative and Unionist Party
The Green Party candidate	Green Party
The Independents Alliance Candidate	The Independents Alliance
The Independents at Swansea official candidate	Independents @ Swansea
The Independents@Swansea official candidate	Independents @ Swansea
The Labour Party Candidate	Labour Party
The Liberal Party Candidate	The Liberal Party
The Local Candidate representing Local People	The Independents Alliance
The Moderate Candidate	The Moderate Group
The official Independents at Swansea candidate	Independents @ Swansea

Party names and descriptions that contain the word 'Candidate'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
The official Independents@Swansea candidate	Independents @ Swansea
The Prerogatives Party Candidate	Prerogatives Party
The Scottish Co-operative Party Candidate	Co-operative Party
The Socialist Alternative Candidate	Socialist Alternative
Town Ward Residents' Association Candidate	Residents Associations of Epsom and Ewell
Trade Unionist and Socialist Candidate	Trade Unionist and Socialist Coalition
vote Roehampton candidate 1 of 2	Vote Roehampton
vote Roehampton candidate 2 of 2	Vote Roehampton
Vote Roehampton: Your local candidates	Vote Roehampton
Walsall Socialist and Trade Union Candidate	Trade Unionist and Socialist Coalition
Wells Independents Candidate	Wells Independents
Wells Independents candidate a fresh approach	Wells Independents
Wells Independents candidate non political approach	Wells Independents
Welsh Co-operative Party Candidate	Co-operative Party
Welsh Conservative Party Candidate	Conservative and Unionist Party
Welsh Labour Candidate	Labour Party
Welsh Labour Party Candidate	Labour Party
Whig Party Candidate	The Whig Party
Whitwell Residents Association Candidate	Whitwell Resident's Association
Your Decision County Councillor Candidate	Your Decision
Your Decision Devon County Councillor Candidate	Your Decision
Your Libertarian Candidate	Pro Liberty
Your local Communist candidate	Communist Party of Britain

Party names and descriptions that contain the word 'Glob'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)

Party names and descriptions that contain the word 'Glob'	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
The Globelization Liberation Dream Party	The Globelization Liberation Dream Party
Independent Green Voice - Localism Not Globalism	Independent Green Voice

Words that when searched, do not appear on the register:

- Isolation

Application summary

PR 17/23 – 18 September 2017

The following table summarises the applications received by the Commission and the registration team's recommendations

Table 1: Director of Political Finance & Regulation and Legal Counsel delegated party registration decisions

Party name and proposed party identity marks (link to assessment note)	Registration team assessment
Alliance EPP: European People's Party UK **Proposed new financial scheme and constitution** **Proposed name:** Alliance 4 Freedoms **Proposed descriptions:** 1. The Stop Brexit Party 2. The 4 Freedoms Party	• Existing Party • England application complete 15.09.17 • Public notice published 20.09.17 • Recommendation to approve the proposed name and proposed description 2. • Recommendation to reject proposed description 1. • Recommendation to reject the proposed financial scheme and constitution. **Initial view** BP 12.10.2017: **The submitted new Constitution** – The recommendation is to reject this because provisions in it purport to delegate or share responsibility for compliance with PPERA to officers beyond the Treasurer and this is contrary to PPERA. I consider the wording in the constitution on this would be better if it also made clear that the Treasurer is solely PPERA responsible, but on balance I don't think the wording is intended to over-ride or contradict PPERA. Rather, it is arguably (by them) looking to achieve internal to the party arrangements towards PPERA compliance. Therefore I am minded to accept the constitution as meeting PPERA, but that Registration Team when writing to the party with the outcome of their applications, should make clear to the party that the irrespective of their internal arrangements as set out in their constitution the Treasurer remains solely PPERA

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Application summary

PR 17/23 – 18 September 2017

The following table summarises the applications received by the Commission and the registration team's recommendations

Party name and proposed party identity marks (link to assessment note)	Registration team assessment
	responsible. **The submitted new financial scheme** - Registration Team recommend refusal due to some inserted words by the party to our 'pro-forma' scheme. See the Assessment. Whilst the inserted words may reflect what the party [wrongly] think about the Commission, I don't think the words are of any significant import and suggest that we do not take issue. However, I am concerned how it is we know whether they have adopted the new financial scheme. So, I would only be minded to approve the financial scheme if we can be satisfied on this point. **[registration team:** At the time we write to them about the outcome of their application, we will ask the party to confirm they have adopted their financial scheme**]** **Proposed change of party name**: The recommendation is to approve this. I note that the Assessment helpfully addresses whether 4 means 'four' or for'. It may be that it could represent a play on words / presentation such as to represent either or both? I don't think in this instance whichever it represents, or more importantly the voter would take it to be, would affect my minded to view. I also note that under our guidance *we may register a party identity mark that uses numerals in the middle of the name, depending on how they are used and whether it is likely to mislead voters*. I agree with the assessment that the name proposed here would not make it likely

Application summary

PR 17/23 – 18 September 2017

The following table summarises the applications received by the Commission and the registration team's recommendations

Party name and proposed party identity marks (link to assessment note)	Registration team assessment
	voters would have their understanding of voting instructions hindered if they saw the proposed name on a ballot paper. I also agree with the assessment that the proposed name 'Alliance 4 Freedoms' would not likely be confusing with 'Alliance for Europe'. However, I am concerned whether 'Alliance 4 Freedoms' would likely be confusing with the already registered description for Motorcycle Alliance of 'Freedom Alliance'. On a ballot paper the two have a level of similarity that a voter might well not distinguish. Is this 'likely'? On balance I think so, and **am minded to refuse this applied for description**. See my opposite comment. I will want to think on whether to refuse is right, and welcome views. **Proposed descriptions**: 1. **The Stop Brexit Party** – I agree with the recommendation that this is not a 'description' in terms of PPERA of the proposed party name (if approved) and would be minded to reject it for that reason. The voter would not know from the face of the ballot paper which party it related to. 2. **The 4 Freedoms Party** — If the applied for party name is approved, I agree with the recommendation that it sufficiently describes the party name and meets the statutory tests. So would be minded to approve it. **Approval Board Comments** LE: I agree with the initial view, except that I would approve the name. Irrespective of

Comment [BP1]: Registration team - The Motorcycle Alliance seem to be a virtually financially inactive party, but they are prior registered with the 'Freedom Alliance' description. Do we know if they field candidates? I ask this as it does seem perhaps unfair that an inactive party and description can stop ano her active party from using a similar descriptor as their wanted party name…but that is where the PPERA legislative regime seemingly takes us and this would not be the first instance where his type of scenario has arisen,

[redacted]**13/10** – The most recent elec ions I could find where the Motorcycle Alliance fielded a candidate were the Old Moat Ward election as part of the local elections in Manchester of 2014, as well as in the Langworthy ward in Salford in the same year.

Application summary

PR 17/23 – 18 September 2017

The following table summarises the applications received by the Commission and the registration team's recommendations

Party name and proposed party identity marks (link to assessment note)	Registration team assessment
	whether the Motorcyle Alliance has a genuine intention to stand candidates (which is a separate issue), I think while the words are obviously the same, the positioning is sufficient to distinguish the name Alliance 4 Freedoms from the Freedom Alliance. TH: On balance, I think that the ordinary reading of the numeral 4 in the proposed name would be as a substitute for the word 'for', rather than 'four': this substitution is frequently used in communications of all kinds. Taking the alternative reading – that it simply means 'four' - would rely on voters understanding that there was such a thing as 'Four Freedoms'. I do not believe there is widespread public understanding of this; further, if the party really meant the numeral only to have the meaning of 'four' they could have applied to register 'Alliance Four Freedoms'. I think the proposed name should therefore be rejected: in my opinion the name would be likely to result in electors confusing the party with an already registered party, the Freedom Alliance. It follows that I would also reject proposed description 2, and would agree with the recommendation and initial view to reject proposed description 1. BW: I agree with Tom's comments above. AW: I agree with Tom's comments [redacted]: I agree with Tom's comments AON: Agree with Tom.

Application summary

PR 17/23 – 18 September 2017

The following table summarises the applications received by the Commission and the registration team's recommendations

Party name and proposed party identity marks (link to assessment note)	Registration team assessment
	RT: I also agree with Tom's comments. **Final Decisions** BP 29.10.2017: Tom's analysis is persuasive. • Refuse the applied for change of party name as it would be likely to result in electors confusing the party with an already registered party, the Freedom Alliance. • No decisions are required on the applied for constitution and financial scheme, because they relate only to the applied for change of party name, which has now been refused. Note I would have approved both documents had the new name been approved by me, provided we could have been satisfied as to the adoption of the new financial scheme.. • Reject both applied for descriptions as neither are a 'description' in terms of PPERA of the existing party name. The voter would not know from the face of the ballot paper which party they related to. Note, had the change of party name been approved I would have rejected description 1 for the same reason, and refused description 2 for reason of likely confusion with the already registered Freedom Alliance.
[redacted]	[redacted]

Alliance EPP: European People's Party UK

Application to register a new name and new descriptions

Political objectives/party information

- The party's application to register a new name and two new descriptions is compliant with Schedule 4 of the Political Parties, Elections and Referendums Act 2000 (PPERA). The application was submitted on 14 September 2017.
    - The party had an application to amend its name to 'Alliance For Britain In Europe' rejected by the Commission on 15 August 2017 (Decision note).
    - The party submitted an application to register the name 'Alliance for Britain' on 10 September, although it later altered this to 'Alliance 4 Freedoms' (the name featured in the current application). The reason for the delay in assessment is largely due to the difficulties the party experienced amending this application to the current one (email chain).
    - As of now we have yet to receive amended versions of the party's financial scheme and constitution to reflect the proposed name change. [redacted] However, the party provided an amended constitution and financial scheme on 5 July 2017 to reflect the application of 8 May 2017 to change the party's name (which was ultimately unsuccessful). We advised the party that we would assess that financial scheme and constitution (email chain – see email of 8 September 2017). Should the current application to change the party's name be approved and the Commission comes to a decision that the substantive content of the constitution and financial scheme meet the requirements of PPERA, then we will seek updated documents that reflect the name of the party.
- The party is currently registered to stand candidates in all of Great Britain.
- The party currently have 12 registered descriptions. The party are applying to register two new descriptions in place of the following already registered descriptions:
    - Britain's future in Europe: 4 Freedoms
    - Remove all party political Electoral Commissioners
- The party objectives outlined in their constitution:

- The Party's purpose is to secure and sustain the national interest of the UK as a democratic, fair and prosperous society at peace with itself and its neighbours and, without discrimination and while protecting the vulnerable, offering the best possible opportunities for economic and other fulfilment to all its people.
- As part of this purpose, the Party is committed - in the interest of the UK and wider European Union - to the UK's effective and constructive participation within a democratic and sustainable EU and seeks close and mutually supportive involvement both within the European People's Party ("EPP") and with EPP's Members.
- The Party also believes the UK has for too long been over-centralised and that - in the interest of the sustainable unity of the UK and of more accessible democracy - more democratic decisions should be taken closer to more people. This belief will be reflected in the Party's evolving policies and structures.
- The Party will also advocate better regulation of electoral processes and continues to aspire to contest elections at all levels of government.

- The party has a website: http://www.4freedomsparty.eu/
- It is important to note that the party was previously registered under the name '4 Freedoms (UK EPP)'. A decision was made by the Commission in October 2014 to deregister the party name as it was deemed likely to hinder an elector's understanding of directions for voting given on the ballot paper (email with letter attachment). The party has been registered under its current name since 18 March 2015 (registration confirmation).

Constitution and Financial scheme

Constitution - link

Paragraph 5(1)(a), Schedule 4 of PPERA prescribes that a party must submit with their application to be registered a copy of their constitution. Section 26(9) of PPERA says that a constitution is the document or documents by which the structure and organisation of the party is determined. Accordingly, the constitution must set out sufficient detail to show the structure and organisation of the party.

As outlined above, this assessment considers the constitution and financial scheme provided on 5 July 2017, in the name that the party previously unsuccessfully applied to be registered under.

I am of the view that the Commission **cannot** be satisfied that the constitution included with the application meets those requirements because:

- The constitution reflects that the party is registered in Great Britain.
- Chapter 1 of the constitution outlines the party's aims and objectives.
- The constitution does not make explicit reference to an intention to stand candidates at specific elections. However, there the constitution does make reference to a procedure for selecting candidates (3(i)).
- Chapter 3 outlines the makeup of the Executive Committee, with Chapter 4 outlining the structure of the Council. This demonstrates the structure of the party. Chapter 3 also demonstrates who is responsible for managing the party, including the responsibility of the party officers, the terms of office and procedure for change of those officers.
- The constitution indicates that the party will hold several different types of meetings – in particular, Council meetings and, when appropriate, party conferences. A quorum is outlined for the Committee meeting, with timings set for the Committee meeting and Council meeting.
- Chapter 2 outlines the rules governing party membership.
- Chapter 3(i) states that '*compliance with the financial scheme registered with the Electoral Commission and consideration from time to time as to any modifications to/replacements of this scheme which should be registered*' are responsibilities held by the Committee which cannot be delegated. The same section of the constitution also states that '*ensuring that the Party is compliant with the Political Parties, Elections and Referendums Act, and such legislation, regulations, or measures amending, supplementing or replacing the Act*' is a responsibility which can be delegated by express decision of the Committee. The current members of the Committee, as set out in the constitution, are Mr Dirk Hazell, the registered leader and nominating officer, and Mr Brendan Donnelly, the registered treasurer.
- The Treasurer should be solely responsible for the party's reporting obligations under PPERA, as is stated at paragraph 6 of the financial scheme. There is a question therefore, as to whether this aspect of the constitution is inconsistent with the financial scheme.
- Chapter 7 states how the constitution can be amended and suggests how the party can be dissolved.

- The constitution largely contains the points which the Commission would expect to be covered in a viable constitution. It is also clearly structured, demonstrating clearly the governance and organisation of the party.
- The main issue that I identified concerns the party's financial reporting obligations which currently, as the constitution alludes, are not the sole responsibility of the registered treasurer. It could be argued that the relevant point in the constitution can be read as suggesting that the Committee is jointly responsible for ensuring that the scheme is adopted, thus checking that the Treasurer performs their function (as per the scheme). However, the constitution also clearly states that compliance with PPERA is a joint-responsibility which can be delegated.
- I recommend that this concern be addressed before the Commission can take a view that the constitution sets out the structure and organisation of the party.

Financial scheme - link

- The party's financial largely follows the Commission's template. There are, however, some deviations from our template.
    - Point 21 states (amendment in bold) 'We note that failure **caused other than by failure of the Commission's own systems** to submit our RP8 annual confirmation of registered details within the prescribed timescale will result in our statutory removal from the register of political parties.' This is not true, as the party will be removed from the register if it does not submit its annual confirmation within the prescribed time period, regardless of whether the party uses the Commission's system or not.
    - Paragraph 22 also deviates from the template, and reads 'The party understands that the Commission may **as permitted by law** impose civil penalties on parties that fail to comply with their legal obligations, including failures to submit statutory returns on time.' This is not problematic as the Commission is not permitted to impose sanctions beyond its remit outlined in PPERA.
- The financial scheme has not been signed, but it is referenced in the constitution.
- There is a question regarding whether or not the scheme has been adopted given the perceived inconsistency between the comments in the constitution regarding the Committee being responsible for compliance with the financial scheme and PPERA, rather than the treasurer.

Recommendation

In making my recommendation I have considered the requirements and statutory tests set out in the Political Parties, Elections and Referendums Act 2000 (PPERA).

I recommend that the following identity marks be **approved** and entered onto the register of political parties in Great Britain.

- Alliance 4 Freedoms
- The 4 Freedoms Party

I recommend that the following identity marks be **rejected** for the reasons as set out in this assessment.

- The Stop Brexit Party
- In relation to the constitution and financial scheme, I am of the view that the Commission **cannot** at this time be satisfied that they meet the requirements of PPERA.

A summary of the searches for similarity are included in **Appendix C**.

[redacted]
6 October 2017

Appendix A: Proposed Name

Proposed name: Alliance 4 Freedoms
Recommendation: Approve

1.1 In making my recommendation to approve the proposed party name I have considered the issues set out in the following paragraphs.

1.2 The proposed name is not the same as that of a party which is already registered in the register in which that party is applying to be registered.

1.3 I searched the register to examine whether this proposed name is likely to cause a voter to confuse it with another already registered identity mark or one that is protected after deregistration.

1.4 I have identified another registered identity mark which could be considered similar to the proposed name: 'Freedom Alliance', a registered description for Motorcycle Alliance since 1 February 2012.

1.5 I believe that the number '4' is being used in place of the word 'four'. This assumption is based on the information on the party's website: '*We support the 4 Freedoms in President FD Roosevelt's iconic 1941 Address: freedoms of speech and faith, freedoms from want and fear. We also support the 4 core EU freedoms of movement of people, goods, services and capital. This is no licence to defraud social security.*'

1.6 I have considered whether it is more likely that the typical voter would recognise the number '4' as representing the word 'four' in line with paragraph 1.5, or as representing the word 'for' (a common technique in internet slang). As the word 'Freedom' has been pluralised in the proposed name, I believe that the typical voter is more likely to read the proposed name as 'Alliance four Freedoms'. Whilst it can be argued that the opposite is true, I do not believe that it is likely to be the case.

1.7 I believe that the expression 'Alliance 4(/four) Freedoms' is not equivalent in meaning to 'Freedom Alliance'. This is because I believe that the concept of '4 Freedoms' (indicated in paragraph 1.4) is distinct from the general concept of 'Freedom'. I believe that the typical voter would recognise that they are distinct.

1.8 I am therefore satisfied that the proposed name is not likely to result in electors confusing that party with a party which is already registered in respect of the relevant part of the United Kingdom.

1.9 The proposed name is not more than six words.

1.10 The proposed name is not offensive. The proposed name is not obscene.

1.11 The proposed name does not include words the publication of which would be likely to amount to the commission of an offence.

1.12 I am satisfied that the proposed name is not likely, were it to appear on a ballot paper issued at an election to result in an elector being misled as to the effect of their vote. I cannot identify a reason why this would be the case.

1.13 I am satisfied that the proposed name does not contradict, or hinder an elector's understanding of, any directions for his guidance in voting given on the ballot paper or elsewhere.

1.14 Although the party name '4 Freedoms (UK EPP)' was deregistered as it was deemed likely to hinder an elector's understanding of directions for voting given on the ballot paper, I do not believe that the proposed name similarly fails the particular test. This is because the number '4' lies within the middle of the proposed name.

1.15 There is precedence for a numeral to feature within a registered identity mark – for instance 'Independence 4 Morecambe', a registered description for Morecambe Bay Independents.

1.16 Our guidance concerning party identity marks (see pages 15-16) states that 'We may register a party identity mark that uses numerals in the middle of the name, depending on how they are used and whether it is likely to mislead voters'. I do not believe that it is likely voters would have their understanding of voting instructions hindered if they saw the proposed name on a ballot paper.

1.17 I have also considered whether the proposed name could be misleading with the registered name Alliance for Europe. This is because the proposed name begins with 'Alliance 4', which is visually and phonetically similar to 'Alliance for'. As identified in paragraph 1.5 of this assessment, the proposed name connotes support for the European Union. The

already registered name also clearly expresses support for Europe. I have therefore considered whether the typical voter is likely to believe that ‘Alliance 4 Freedoms’ is affiliated to ‘Alliance for Europe’.

1.18 However, as I argued in paragraphs 1.5-1.6 of this assessment, I believe that the numeral ‘4’ in the proposed name represents the word ‘four’, and this meaning (‘4/Four Freedoms’) is clear to the typical voter.

1.19 This means that both of the identity marks illustrate that they are ‘Alliance(s)’ in favour of Europe/the EU. However, I believe that an identity mark containing reference to the concept of ‘4 Freedoms’ can be sufficiently differentiated from the identity mark ‘Alliance for Europe’. This is because I believe that the concept of ‘4 Freedoms’ is clear and specific. Whilst it falls within the broader ideology of support for the EU, I believe that the typical voter is likely to recognise that a party supporting the more specific ‘4 Freedoms’ is separate to another party advocating the EU more generally.

1.20 I therefore do not believe that it is likely that a typical voter would believe that the two parties are affiliated, and the proposed name is not misleading.

1.21 The proposed name does not include any script other than Roman script

1.22 The proposed name does not include any word or expression prohibited by order made by the Secretary of State.

Appendix B: Proposed descriptions

Proposed description 1: The Stop Brexit Party
Recommendation: Reject

2.1 In making my recommendation to reject the proposed description I have considered the issues set out in the following paragraphs.

2.2 I considered whether the proposed description is a description of the party and whether it links clearly to the party identity.

2.3 I am not satisfied that the proposed description constitutes a satisfactory description as I do not believe that a voter would be able to recognise the party from it. This is because the proposed description does not make reference to the party name, and the content of the description could not clearly identify the party otherwise. The proposed description should be rejected for this reason.

2.4 I have not considered the other statutory tests as I am of the view that the proposed description does not constitute a description under PPERA. If the decision maker was minded to conclude otherwise, the other statutory tests should be considered before any decision is made.

Proposed description 2: The 4 Freedoms Party
Recommendation: Approve

2.5 In making my recommendation to approve the proposed description I have considered the issues set out in the following paragraphs.

2.6 The recommendation outlined below is dependent on the approval of the proposed name ‘Alliance 4 Freedoms’. As outlined in Appendix A, I am minded to approve the proposed name. If the decision maker was minded to disagree, then the proposed description would not identify the party and thus would not meet the threshold of a party description.

2.7 I am satisfied that the proposed description constitutes a satisfactory description as I do believe that a voter would be able to recognise the party from the proposed description.

2.8 Although the proposed description does not contain the proposed party name in full, I believe that the expression '4 Freedoms' constitutes an important element in the party's identity. This assumption is based on the point made in paragraph 1.5 of this assessment. I also do not believe that the absence of the word 'Alliance' would prevent the identity of the party being made clear from the proposed description. Careful consideration of the Approvals Board is warranted on this aspect.

2.9 The proposed description is not the same as that of a party which is already registered in the register in which that party is applying to be registered.

2.10 I searched the register to examine whether this proposed name is likely to cause a voter to confuse it with another already registered identity mark or one that is protected after deregistration.

2.11 I have identified another registered identify mark which could be considered similar to the proposed description: Freedom Party, which has been registered since 23 March 2016.

2.12 I argued in paragraph 1.5 of this assessment that the number '4' is being used in place of the word 'four' in the party name. I also argued in paragraph 1.6 that the typical voter is more likely to read the proposed name as 'Alliance four Freedoms' rather than 'Alliance for Freedoms'. I believe that, similarly, the typical voter is likely to read the proposed description as 'The Four Freedoms Party' rather than some other meaning.

2.13 I believe that 'The 4(/Four) Freedoms Party' has a meaning which is sufficiently different to 'Freedom Party'. The proposed description revolves around the importance of 'Four Freedoms' – a distinct concept. The registered name indicates support for a broader concept of 'Freedom'.

2.14 For similar reasons outlined in paragraphs 1.3-1.8 of this assessment, I do not believe that the proposed description can be confused with 'Freedom Alliance', a registered description for Motorcycle Alliance.

2.15 I cannot identify any other registered identity marks which would be likely to be confused with the proposed description. I am therefore satisfied that the proposed description is not likely to result in electors confusing that party with a party which is already registered in respect of the relevant part of the United Kingdom.

2.16 The proposed description is not more than six words.

2.17 The proposed description is not offensive. The proposed description is not obscene.

2.18 The proposed description does not include words the publication of which would be likely to amount to the commission of an offence.

2.19 I am satisfied that the proposed description is not likely, were it to appear on a ballot paper issued at an election, to result in an elector being misled as to the effect of their vote.

2.20 I considered whether, given that the party name is not outlined in full within the proposed description, it is likely to mislead voters to think they are not voting for the applicant party. However, as I believe that the proposed description constitutes a satisfactory description of the party (see paragraphs 2.7-2.8), I do not think that the description is misleading.

2.21 I am satisfied that the proposed description does not contradict, or hinder an elector's understanding of, any directions for his guidance in voting given on the ballot paper or elsewhere. This is consistent with the points outlined in paragraphs 1.13-1.15 of this assessment.

2.22 The proposed description does not include any script other than Roman script.

2.23 The proposed description does not include any word or expression prohibited by order made by the Secretary of State.

Appendix C – Searches for the same or similar names and descriptions

Table D1: Similarity score results

The following table lists those identifiers that were found to be similar to by an electronic matching process. The higher the value the higher the similarity between the proposed descriptions and the identifier listed below.

Proposed identity marks	Similar identifiers	Party Name of similar identifiers (if the same indicates the similar identifier is a party name)	Similarity
Alliance 4 Freedoms	~~Alliance for Britain's 4 Freedoms Future~~	~~Alliance EPP: European People's Party UK~~	~~0.9067~~
	Freedom Alliance	Motorcycle Alliance	0.8930
	Freedom Party	Freedom Party	0.7490
	~~Britain's future in Europe: 4 Freedoms~~	~~Alliance EPP: European People's Party UK~~	~~0.7222~~
	Motorcycle Freedom Alliance	Motorcycle Alliance	0.5778
	Freedom Party Candidate	Freedom Party	0.5609
	Freedom of Movement Alliance	Motorcycle Alliance	0.5321
	UK Freedom Party	Freedom Party	0.5179
	Vote For Freedom	Space Navies Party	0.4812
The Stop Brexit Party	~~Stop Brexit~~	~~Alliance EPP: European People's Party UK~~	~~0.9571~~
	Brit Dems stop immigration leave EU	British Democratic Party	0.6453
	~~No Brexit~~	~~Alliance EPP: European People's Party UK~~	~~0.5467~~

Proposed identity marks	Similar identifiers	Party Name of similar identifiers (if the same indicates the similar identifier is a party name)	Similarity
	Building the People's Brexit	English Futures Party	0.5187
	Stop the war	Scottish Socialist Party	0.5022
	Equality at the top, fairness, justice	All People's Party	0.4455
	Stop the Cuts Defend Public Services	Communities Against the Cuts	0.4389
	Stop HS2	Independence from Europe	0.4136
	Brit Dems	British Democratic Party	0.4025
The 4 Freedoms Party	Freedom Party	Freedom Party	0.8616
	~~Alliance for Britain's 4 Freedoms Future~~	~~Alliance EPP: European People's Party UK~~	~~0.7288~~
	~~Britain's future in Europe: 4 Freedoms~~	~~Alliance EPP: European People's Party UK~~	~~0.7222~~
	Freedom Party Candidate	Freedom Party	0.6451
	Freedom Alliance	Motorcycle Alliance	0.6119
	UK Freedom Party	Freedom Party	0.5956
	Vote For Freedom	Space Navies Party	0.4812
	People Social Freedom Party	People Social Freedom Party	0.4241

Tables D2 Party identity marks that contain words that appear in the proposed identity marks

Words that were not searched:

- Party
- The

Party names and descriptions that contain the word 4	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
~~Alliance for Britain's 4 Freedoms Future~~	~~Alliance EPP: European People's Party UK~~
~~Britain's future in Europe: 4 Freedoms~~	~~Alliance EPP: European People's Party UK~~
Independence 4 Morecambe	Morecambe Bay Independents

Party names and descriptions that contain the word Alliance	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
~~Alliance EPP: European People's Party UK~~	~~Alliance EPP: European People's Party UK~~
~~Alliance for Britain's 4 Freedoms Future~~	~~Alliance EPP: European People's Party UK~~
Alliance for Europe	Alliance for Europe
Alliance for Europe in Wales	Alliance for Europe
Alliance For Green Socialism	Alliance For Green Socialism
Alliance for Green Socialism - Save Homes	Alliance For Green Socialism
Alliance For Green Socialism - Save NHS	Alliance For Green Socialism
Alliance For Green Socialism - Save Schools	Alliance For Green Socialism
Alliance for London	Alliance for London
Alliance of East Devon Independents	East Devon Alliance
Alliance Party For Harlow	Harlow Alliance Party
Alliance Party of Harlow	Harlow Alliance Party
Anti-Corruption Pro-Family Christian Alliance	War Veteran's Pro-Traditional Family Party
Bournemouth Independent Alliance	Bournemouth Independent Alliance
Christian Peoples Alliance	Christian Peoples Alliance
Christian Peoples Alliance - Cynghrair Pobl Gristnogol	Christian Peoples Alliance
Christian Peoples Alliance - Supporting Traditional Marriage	Christian Peoples Alliance

Party names and descriptions that contain the word Alliance	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Deep Earth Ecosphere Preservation Alliance	Deep Earth Ecosphere Preservation Alliance
East Devon Alliance	East Devon Alliance
East Devon Alliance of Independents	East Devon Alliance
East Devon Alliance: Working for you	East Devon Alliance
East Devon Independent Alliance	East Devon Alliance
Equal Parenting Alliance	Equal Parenting Alliance
Freedom Alliance	Motorcycle Alliance
Freedom of Movement Alliance	Motorcycle Alliance
Harlow Action Alliance Party	Harlow Alliance Party
Harlow Alliance Party	Harlow Alliance Party
Harlow Alliance Party (People's Initiative)	Harlow Alliance Party
Harlow Alliance Party People's Initiative (H.A.P.P.I.)	Harlow Alliance Party
Harlow Residents Alliance Party	Harlow Alliance Party
Independent Alliance North Lanarkshire	Independent Alliance North Lanarkshire
Independent East Devon Alliance	East Devon Alliance
Left Green Alliance	Alliance For Green Socialism
Motor Alliance	Motorcycle Alliance
Motorcycle Alliance	Motorcycle Alliance
Motorcycle Alliance	Motorcycle Alliance
Motorcycle Freedom Alliance	Motorcycle Alliance
Motoring Alliance	Motorcycle Alliance
New United Kingdom Voters Alliance	New United Kingdom Voters Alliance
North of England Community Alliance	North of England Community Alliance
Populist Alliance	Populist Party
Scotland's Left Alliance	RISE - Respect, Independence, Socialism and Environmentalism

Party names and descriptions that contain the word Alliance	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Scottish Democratic Alliance	Scottish Democratic Alliance
Socialist Alliance	Socialist Alliance
Stapleford Alliance	Stapleford Alliance
The Alliance for Europe Candidate	Alliance for Europe
The Alliance Party For Harlow	Harlow Alliance Party
The Alliance Party of Harlow	Harlow Alliance Party
The Harlow Alliance Party	Harlow Alliance Party
The Independent Political Alliance Party	The Independent Political Alliance Party
The Independents Alliance	The Independents Alliance
The Independents Alliance Candidate	The Independents Alliance
UK Yorkshire Socialist Alliance Party	UK Yorkshire Socialist Alliance Party

Party names and descriptions that contain the word Brexit	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Building the People's Brexit	English Futures Party
English Independence - Brexit Now	English Independence
~~No Brexit~~	~~Alliance EPP: European People's Party UK~~
No Referendum, Maintain Union, Pro-Brexit	British Union & Sovereignty Party
No Referendums, Maintain Union, Pro-Brexit	British Union & Sovereignty Party
~~Stop Brexit~~	~~Alliance EPP: European People's Party UK~~

Party names and descriptions that contain the word *Freedom*	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
~~Alliance for Britain's 4 Freedoms Future~~	~~Alliance EPP: European People's Party UK~~
~~Britain's future in Europe: 4 Freedoms~~	~~Alliance EPP: European People's Party UK~~

Party names and descriptions that contain the word *Freedom*	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Freedom Alliance	Motorcycle Alliance
Freedom of Movement Alliance	Motorcycle Alliance
Freedom Party	Freedom Party
Freedom Party Candidate	Freedom Party
Freedom to choose	Vapers in Power
Motorcycle Freedom Alliance	Motorcycle Alliance
People Social Freedom	People Social Freedom Party
People Social Freedom Party	People Social Freedom Party
Populist Action - New Dawn for Freedom	Populist Party
Scottish Democrats Freedom & Equality	Scottish Democrats
UK Freedom Party	Freedom Party
Vote For Freedom	Space Navies Party

Party names and descriptions that contain the word Freedoms	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
~~Alliance for Britain's 4 Freedoms Future~~	~~Alliance EPP: European People's Party UK~~
~~Britain's future in Europe: 4 Freedoms~~	~~Alliance EPP: European People's Party UK~~

Party names and descriptions that contain the word Stop	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Brit Dems stop immigration leave EU	British Democratic Party
British Democrats stop immigration leave EU	British Democratic Party
Green Party Stop Fracking Now	Green Party
~~Stop Brexit~~	~~Alliance EPP: European People's Party UK~~
Stop commercial banks owning Britain's money	Common Good

Party names and descriptions that contain the word Stop	Party Name of the similar identifier (if the same indicates the similar identifier is a party name)
Stop HS2	Independence from Europe
Stop the Cuts Defend Public Services	Communities Against the Cuts
Stop the war	Scottish Socialist Party
Stop Urban Sprawl	Formby Residents Action Group
Stopping destruction of Surrey's green spaces	Guildford Greenbelt Group

BOTH UNIONS PARTY

APPLICATION TO REGISTER IN GB

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Decision and Approval Board comments

Applicant party name: Both Unions Party (GB)

Application type: Application to register new descriptions

Relevant register: GB (England, Scotland, Wales)

Application details and recommendation	Decision and Approval Board comments
Proposed name: 1. Alliance 4 Freedoms (**R**) Proposed descriptions: 1. Alliance 4 Freedoms: British European Unity (**R**) 2. Alliance 4 Freedoms: promoting British unity (**R**) 3. Alliance 4 Freedoms: promoting European unity (**R**) 4. Alliance 4 Freedoms: European People's Party (**R**) 5. Alliance 4 Freedoms: Scotland Britain Europe (**R**) 6. Alliance 4 Freedoms: replace Electoral Commission (**R**) 7. Alliance 4 Freedoms: Mayday Save Britain (**R**) 8. Alliance 4 Freedoms: Mind the Gap! (**R**)	**Initial view (please add initials and date):** LE – 04/05/21 – As recommended I am minded to refuse the name for reasons of confusion with the Alliance for Democracy and Freedom, the Freedom Alliance – Integrity, Society and Economy (which appears to be known as the Freedom Alliance) and the Freedom Party. While each of these names is sufficiently dissimilar from each other, the applied for name takes elements from them all in a way that I am minded to conclude is confusing with each. This is, as set out in the assessment, in respect of the Welsh translation as well. I am therefore also minded to refuse the descriptions and emblem because of the likelihood of confusion. I do not immediately see the argument that the name is misleading. It seems to me that confusion is the right test to consider here. **Approval Board comments (please add initials and date):** AON – 10/5/21 – I agree with the minded view. CH 10/05/21: I agree with the recommendation and the initial view. RT 11/05/21: I agree with the recommendations and with the initial view. NN 12.05.2021: I agree with the recommendation and initial view. I was surprised to note that there already exists an Alliance for Democracy and Freedom and the Freedom Alliance – Integrity, Society and Economy. These seem very similar to each other without adding Alliance 4 Freedoms into the mix. MLP 14.05.21: I agree with the initial view. TH 14.05.2021: I agree with the recommendations and the initial view.

Application details and recommendation	Decision and Approval Board comments
9. Alliance 4 Freedoms: rejoin EU (R) Proposed emblems: 10.  (R)	**Decision (please add initials and date):** LE – 17/05/21 – I refuse the name, description and emblem.

Commented [redacted] Decision to refuse the emblem due to it likely to mislead on the basis that the name was deemed to be confusing with several other registered names.

Recommendation of Registration Team member

1. In making my recommendations I have considered the requirements and statutory tests set out in the Political Parties, Elections and Referendums Act 2000 (PPERA).
2. I recommend that the Commission **reject** party's application.
3. My recommendations in relation to each aspect of the application are set out as follows:

Name	Alliance 4 Freedoms	R	Likely to confuse with a registered party
Description 1	Alliance 4 Freedoms: British European Unity	R	Likely to confuse with a registered party
Description 2	Alliance 4 Freedoms: promoting British unity	R	Likely to confuse with a registered party Likely to mislead
Description 3	Alliance 4 Freedoms: promoting European unity	R	Likely to confuse with a registered party

Description 4	Alliance 4 Freedoms: European People's Party	**R**	Likely to confuse with a registered party
Description 5	Alliance 4 Freedoms: Scotland Britain Europe	**R**	Likely to confuse with a registered party
Description 6	Alliance 4 Freedoms: replace Electoral Commission	**R**	Likely to confuse with a registered party
Description 7	Alliance 4 Freedoms: Mayday Save Britain	**R**	Likely to confuse with a registered party
Description 8	Alliance 4 Freedoms: Mind the Gap!	**R**	Likely to confuse with a registered party
Description 9	Alliance 4 Freedoms: rejoin EU	**R**	Likely to confuse with a registered party
Emblem 1		**R**	Likely to confuse with a registered party

[redacted]

26 April 2021

Registration Team member assessment

Applicant party information

Link to party's registered entry	Link
Link to party accounts	Website, Twitter, Facebook

4. The party's entry on the public register can be found here.
5. Included in the application is an updated constitution and financial scheme to reflect the party's change of name.

Application history

Link to application docs	Application, Financial Scheme, Constitution, Emblem 1,	
Part of the register	GB (England, Scotland, Wales)	
Date first lodged	**Date considered complete**	**Date published for comment**
09 April 2021	09 April 2021	22 April 2021

6. The application was submitted via PEF online. A payment of £25 has been made.

Consideration of the Welsh Language Measure

7. As a public body operating in Wales, we are required to carry out our functions in line with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards. We are required to treat the Welsh language no less favourably than English in performing our functions in Wales.
8. I have considered these requirements insofar as they relate to our assessment of this registration application, including the application of the statutory tests under Part II of PPERA.
9. To this end, as the party has applied to contest elections in Wales, I have sought Welsh translations of all proposed English identity marks (and vice versa), including text contained in emblems. I have considered those translations and their relevance to each of the relevant statutory tests.

Type	ID Mark – English Version	ID Mark – Welsh Version	Translators comments
Name	Alliance 4 Freedoms	Y Cynghrair dros Ryddid Y Cynghrair dros Ryddfreiniau	In Welsh, the word for 'freedom' doesn't have a plural form, as such, because it is not a quantifiable, concrete noun. The closest translation here therefore literally means 'the Alliance for Freedom', which is very close, if not the same, as the translation for the Freedom Alliance, if I remember correctly. This uses an alternative word for 'freedom' (which also means 'privileges', but is still quite similar to the other party's name, unfortunately)
Description	Alliance 4 Freedoms: British European Unity	Y Cynghrair dros Ryddid: Undod Prydeinig Ewropeaidd	
Description	Alliance 4 Freedoms: promoting British unity	Y Cynghrair dros Ryddid: hyrwyddo undod Prydeinig	
Description	Alliance 4 Freedoms: promoting European unity	Y Cynghrair dros Ryddid: hyrwyddo undod Ewropeaidd	
Description	Alliance 4 Freedoms: European People's Party	Y Cynghrair dros Ryddid: Plaid Pobl Ewrop	
Description	Alliance 4 Freedoms: Scotland Britain Europe	Y Cynghrair dros Ryddid: Yr Alban, Prydain, Ewrop	

Description	**Alliance 4 Freedoms: replace Electoral Commission**	Y Cynghrair dros Ryddid: Disodli'r Comisiwn Etholiadol	
Description	Alliance 4 Freedoms: Mayday Save Britain	Y Cynghrair dros Ryddid: Argyfwng, Achubwch Brydain	
Description	Alliance 4 Freedoms: Mind the Gap!	Y Cynghrair dros Ryddid: Gofalwch rhag y Bwlch!	
Description	Alliance 4 Freedoms: rejoin EU	Y Cynghrair dros Ryddid: Ailymuno â'r UE	
Emblem		Y Cynghrair dros Ryddid Y Cynghrair dros Ryddfreiniau	In Welsh, the word for 'freedom' doesn't have a plural form, as such, because it is not a quantifiable, concrete noun. The closest translation here therefore literally means 'the Alliance for Freedom', which is very close, if not the same, as the translation for the Freedom Alliance, if I remember correctly. This uses an alternative word for 'freedom' (which also means 'privileges', but is still quite similar to the other party's name, unfortunately)

Application form

Link to application form	Application form
Recommendation	**Approve**
Summary reason	As far as I am aware there are no inconsistencies with the application form

10. I **am** satisfies that the required fee has been provided.
    a. The application was submitted via PEF Online with a £25 fee.
11. I **am** satisfied that the application has been properly authorised.

Name

Proposed name	Alliance 4 Freedoms
Translation of the name in Welsh	Y Cynghrair dros Ryddid / Y Cynghrair dros Ryddfreiniau
Recommendation	**Reject**
Summary reason	Likely to confuse with a registered party Likely to mislead a voter as to the effect of their vote

12. In undertaking this aspect of the assessment, I applied the statutory tests set out in section 28 of PPERA 2000. The relevant statutory excerpt is included here.

13. I have also given regard to the Commission's guidance when considering applications to register a party. This guidance is included here. Our guidance at page 11 states:

> *We cannot register an identity mark if, in the Commission's opinion, **it is likely** to result in a voter believing they are voting for an organisation that is not the party or connected to the party.*

14. I have also given regard to the Commission's guidance on interpreting the "confusing" and "misleading" tests as set out in section 28 of PPERA 2000. The guidance is included here (pages 11 and 12).

15. I have given regard to the meaning of "likely" in the context of my function as a Registration Officer with respect to the statutory tests. [redacted] I have borne these in mind when I have considered this aspect of the application.

16. As part of my consideration of the application As explained above, in considering the requirements of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards, I have sought a translation for this proposed name: **Y Cynghrair dros Ryddid / Y Cynghrair dros Ryddfreiniau**

17.. I have considered the relevance of the translation to each of the relevant statutory tests.

a. The record of the translation can be found here.

18. The proposed identifier **is not the same** as another identifier on the register.

19. I am of the view that registration of the identifier **is likely** to result in electors confusing the applicant party with another registered party.

a. I have considered whether there are any registered identity marks that could result in a voter confusing them with the applicant party. The results are shown in the Register Searches section below.

b. I have compared the proposed name to the most similar registered identity marks (in my view) in a ballot paper example below:

OAK, Mary (address in the Constituency) Alliance for Democracy and Freedom	
ASH, James (address in the Constituency) Freedom Alliance- Integrity, Society, Economy	
PINE, Susan (address in the Constituency) Alliance 4 Freedoms	
ELM, David (address in the Constituency) Freedom Party	

20. I shall address each identity mark in turn.

Alliance for Democracy and Freedom

a. With reference to the Commission's guidance on applying the statutory tests, I considered that the proposed identity mark is likely to cause confusion with the registered identity mark - **Alliance for Democracy and Freedom**

b. I have considered relevant accumulate factors such as:

- The fact that both parties share, some of the same values such as advocating for a coalition created to promote freedom in society
- Both parties are likely to appear on the same register

c. Taking into account the above, I consider that the inclusion of the word "Democracy" in the registered identity mark does not provide sufficient distance between the applicant and Alliance for Democracy and Freedom.

d. The proposed name is very visually and contextually similar to the registered name.

e. There are some minor visual differences compared to the registered identifier such as; the omission of the word "Democracy", the pluralisation of the word "Freedom" and the spelling of the word "for". I think it very likely that this would cause a reasonable voter confusion. In my view, a reasonable voter would find it difficult to discern which identity mark is for which party, without having extensive knowledge of the registered parties existing identity marks and the specific political history of the individuals. I think it very unlikely that a reasonable voter will have this knowledge.

f. Both phrases are contextually very similar as they describe an organisation which is a coalition created to promote freedom in society.

g. I am of the opinion that due to the visual and contextual similarities the proposed identifier is sufficiently similar to 'Alliance for Democracy and Freedom'.

Analysis of the translation - Y Cynghrair dros Ryddid / Y Cynghrair dros Ryddfreiniau

21. In fulfilling our obligations under the Welsh language measure, I have also considered the relevance of the statutory tests with respect to the translation of the proposed name in English. For the avoidance of doubt those translations are **Y Cynghrair dros Ryddid / Y Cynghrair dros Ryddfreiniau**

22. I note from the our internal translator there is, in essence two possible translations of the words "Alliance 4 Freedoms" being both **Y Cynghrair dros Ryddid / Y Cynghrair dros Ryddfreiniau (**see link here). Our Internal translator considered that "In Welsh, the word for 'freedom' doesn't have a plural form, as such, because it is not a quantifiable, concrete noun. The closest translation here therefore literally means 'the Alliance for Freedom', which is very close, if not the same, as the translation for the Freedom Alliance". I will discuss the similarities between the two names further down the document.

23. The identity mark 'Alliance for Democracy and Freedom' translates into Welsh as 'Y Cynghrair dros Ddemocratiaeth a Rhyddid' (see here).

24. Visually, both the first translation of the proposed name and the registered identifier are similar in that they both include the words "Y", "Cynghrair",

"Dros" and "Rhyddid". The translation of the registered identifier does include the word "Ddemocratiaeth" but contextually, I do not consider the word to provide any further distinction to mitigate the risk and likelihood of voter confusion. I have noted there are other alliance parties on the register such as Alliance for Green Socialism and Alliance for Europe, however, when used interchangeably in Wales, are sufficiently distinct and there is little or no likelihood of confusion. In my view, both names project a clearer, more distinctive brand and its own associations which avoid confusion with Alliance for Democracy and Freedom or any other registered party.

25. I considered how the translations of the proposed name and the name of the registered party would be in the minds of a voter. Given the interchangeable nature of the English and Welsh language in Wales, it is my view that the names are *so* similar that a voter would find it difficult to differentiate between the two parties thereby causing voter confusion.

26. It is my view, the proposed identifier is likely to cause confusion with an identity mark already registered,

Freedom Alliance – Integrity, Society and Economy

a. With reference to the Commission's guidance on applying the statutory tests, I considered that the proposed identity mark is likely to cause confusion with the registered party - **Freedom Alliance – Integrity, Society and Economy.**

b. I have considered relevant accumulate factors such as:

    - The fact that both parties share, some of the same values such as advocating for an organisation which is a coalition created to promote freedom in society

    - Both parties are likely to appear on the same register

c. The proposed name is very visually and contextually similar to the registered name.

d. There are some visual differences compared to the registered identifier. For example, the registered identifier includes several nouns summarising the issues championed by the party. I think it very likely that this would cause a reasonable voter confusion. In my view, a reasonable voter would find it difficult to discern which identity mark is for which party, without having extensive knowledge of the registered parties existing identity marks and the specific political history of the individuals. I think it very unlikely that a reasonable voter will have this knowledge.

e. Both phrases are contextually very similar as they describe an organisation which is a coalition created to promote freedom in society.

f. I am of the opinion that due to the visual and contextual similarities the proposed identifier is sufficiently similar to '**Freedom Alliance – Integrity, Society and Economy**'.

Analysis of the translation - Y Cynghrair dros Ryddid / Y Cynghrair dros Ryddfreiniau

27. In fulfilling our obligations under the Welsh language measure, I have also considered the relevance of the statutory tests with respect to the translation of the proposed name in English. For the avoidance of doubt those translations are **Y Cynghrair dros Ryddid / Y Cynghrair dros Ryddfreiniau**

28. I note from the our internal translator there is, in essence two possible translations of the words "Alliance 4 Freedoms" being both **Y Cynghrair dros Ryddid / Y Cynghrair dros Ryddfreiniau (**see link here). Our Internal translator considered that "In Welsh, the word for 'freedom' doesn't have a plural form, as such, because it is not a quantifiable, concrete noun. The closest translation here therefore literally means 'the Alliance for Freedom', which is very close, if not the same, as the translation for the Freedom Alliance".

29. The identity mark 'Freedom Alliance – Integrity, Society and Economy' translates into Welsh as '**Y Gynghrair dros Ryddid – Unionder, Cymdeithas, yr Economi**.

30. Visually, both the first translation of the proposed name and the registered identifier are similar in that they both include the words "Y", "Cynghrair/Gynghrair", "Dros" and "Rhyddid/Ryddid". The translation of the registered identifier does include the words "Unionder", "Cymdeithas", "yr" and "Economi" but contextually, I do not consider the words additionally provide any further distinction to mitigate the risk and likelihood of voter confusion. That is because the additional words are likely to be perceived as a strapline of the party. I have noted there are other alliance parties on the register such as Alliance for Green Socialism and Alliance for Europe, however, when used interchangeably in Wales, are sufficiently distinct and there is little or no likelihood of confusion. In my view, both names project a clearer, more distinctive brand and its own associations which avoid confusion with Freedom Alliance – Integrity, Society and Economy' or any other registered party.

31. I considered how the translations of the proposed name and the name of the registered party would be in the minds of a voter. Given the interchangeable nature of the English and Welsh language in Wales, it is my view that the names are *so* similar that a voter would find it difficult to differentiate between the two parties thereby causing voter confusion.

Freedom Party

32. With reference to the Commission's guidance on applying the statutory tests, I considered that this registered party was not going to cause confusion or mislead a voter. The reason I consider this to be case is because, whilst the name contains the word "Freedom", there is a clear visual difference to the proposed party name on the ballot paper. The registered party name also offers a very different conceptual position when considered directly besides the proposed name which is amplified by the inclusion of the word "Alliance". I consider that a voter is unlikely to be confused.

33. It is my view, the proposed identifier is likely to cause confusion with an identity mark already registered,
34. The proposed identifier **is not more** than six words.
35. The proposed identifier, in my view, **is not** obscene or offensive.
36. The proposed identifier, in my view, if published is **not likely** amount to the commission of an offence.
37. The proposed identifier, in my view, is **likely**, were it to appear on a ballot paper, to result in an elector being misled as to the effect of their vote.

Alliance for Democracy and Freedom

a. For similar reasons outlined in the confuse test, It is my opinion, having considered the application, translations of the identity marks and applied the statutory tests against the proposed name, that it is likely a voter could be misled as to the effect of their vote if the proposed name was to appear on a ballot paper in the relevant part of Great Britain. I consider this to be a real possibility.

Freedom Alliance – Integrity, Society and Freedom

a. Taking into account the above, I considered various other factors including the party's social media accounts. The social media accounts for the party consistently refer to the party as the 'Freedom Alliance'. The mailing letter for the party states refers to the party as 'Freedom Alliance'.
b. The party's website uses 'Freedom Alliance personal liberty and freedom the registered descriptions for the party.



c. I have also considered the party's registered descriptions. Each description is punctuated with a period, or full stop indication two separate phrases. The punctuation of each of the descriptions implies that 'Freedom Alliance' is the name of the party and the following statement a party policy or slogan. As such the party is likely to be known as '**Y Gynghrair dros Ryddid**' to Welsh speakers. This adds to the evidence that the party's name is generally accepted to be 'Freedom Alliance'.

I. Freedom Alliance. Dignity and Democracy
II. Freedom Alliance. The Real Alternative
III. Freedom Alliance. Make Britain Free.
IV. Freedom Alliance. Supporting Medical Freedom.
V. Freedom Alliance. No Lockdown. No Curfews.
VI. Freedom Alliance. Supporting Personal Freedom
VII. Freedom Alliance. Independent Britain.
VIII. Freedom Alliance. Personal Liberty and Freedom
IX. Freedom Alliance. Make Scotland Free
X. Freedom Alliance. People Matter
XI. Freedom Alliance. Liberty, Equality and Justice
XII. Freedom Alliance. Scotland's Opposition to Lockdown

38. It is my opinion, having considered the application, translations of the identity marks and applied the statutory tests against the proposed name that it is likely a voter could be misled as to the effect of their vote if the proposed name was to appear on a ballot paper in the relevant part of Great Britain. I consider this to be a real possibility.

39. The proposed identifier, in my view, is **not likely**, were it to appear on a ballot paper, to contradict, or hinder an elector's understanding of, any directions for their guidance in voting.

40. The proposed identifier **does not** include any script other than Roman Script.

41. The proposed identifier **does not** include a word or expression prohibited by order made by the Secretary of State.

Descriptions

Description 1

Proposed description	Alliance 4 Freedoms: British European Unity
Recommendation	**Reject**
Summary reason	Likely to confuse with a registered party Likely to mislead a voter as to the effect of their vote

42. In making my recommendation I have considered the factors set out in the following paragraphs.
43. As explained above, in considering the requirements of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards, I have sought a translation for this proposed description: **Y Cynghrair dros Ryddid: Undod Prydeinig Ewropeaidd**
    a. The record of the translation can be found here.
44. As my recommendation is that the proposed name is likely to confuse a voter and mislead a voter to the effect of their vote, I have not considered the statutory tests at this stage. If the delegated decision maker is satisfied that this amounts to a description under PPERA, the rest of the requirements will be considered at that point.

Description 2

Proposed description	Alliance 4 Freedoms: promoting British unity
Recommendation	**Reject**
Summary reason	Likely to confuse with a registered party Likely to mislead a voter as to the effect of their vote

45. In making my recommendation I have considered the factors set out in the following paragraphs.
46. As explained above, in considering the requirements of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards, I have sought a translation for this proposed description: **Y Cynghrair dros Ryddid: hyrwyddo undod Prydeinig**
    a. The record of the translation can be found here.
47. As my recommendation is that the proposed name is likely to confuse a voter and mislead a voter to the effect of their vote, I have not considered

the statutory tests at this stage. If the delegated decision maker is satisfied that this amounts to a description under PPERA, the rest of the requirements will be considered at that point.

Description 3

Proposed description	Alliance 4 Freedoms: promoting European unity
Recommendation	**Reject**
Summary reason	Likely to confuse with a registered party Likely to mislead a voter as to the effect of their vote

48. In making my recommendation I have considered the factors set out in the following paragraphs.
49. As explained above, in considering the requirements of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards, I have sought a translation for this proposed description: **Y Cynghrair dros Ryddid: hyrwyddo undod Ewropeaidd**
50. I have considered the relevance of the translation to each of the relevant statutory tests.
    a. The record of the translation can be found here.

51. As my recommendation is that the proposed name is likely to confuse a voter and mislead a voter to the effect of their vote, I have not considered the statutory tests at this stage. If the delegated decision maker is satisfied that this amounts to a description under PPERA, the rest of the requirements will be considered at that point.

Description 4

Proposed description	Alliance 4 Freedoms: European People's Party
Recommendation	**Reject**
Summary reason	Likely to confuse with a registered party Likely to mislead a voter as to the effect of their vote

52. In making my recommendation I have considered the factors set out in the following paragraphs.
53. As explained above, in considering the requirements of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards, I have sought a translation for this proposed description: **Y Cynghrair dros Ryddid: Plaid Pobl Ewrop**

54. I have considered the relevance of the translation to each of the relevant statutory tests.
    a. The record of the translation can be found here.
55. As my recommendation is that the proposed name is likely to confuse a voter and mislead a voter to the effect of their vote, I have not considered the statutory tests at this stage. If the delegated decision maker is satisfied that this amounts to a description under PPERA, the rest of the requirements will be considered at that point.

Description 5

Proposed description	Alliance 4 Freedoms: European People's Party
Recommendation	**Reject**
Summary reason	Likely to confuse with a registered party Likely to mislead a voter as to the effect of their vote

56. In making my recommendation I have considered the factors set out in the following paragraphs.
57. As explained above, in considering the requirements of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards, I have sought a translation for this proposed description: **Y Cynghrair dros Ryddid: Plaid Pobl Ewro**
58. I have considered the relevance of the translation to each of the relevant statutory tests.
    a. The record of the translation can be found here.
59. As my recommendation is that the proposed name is likely to confuse a voter and mislead a voter to the effect of their vote, I have not considered the statutory tests at this stage. If the delegated decision maker is satisfied that this amounts to a description under PPERA, the rest of the requirements will be considered at that point.

Description 6

Proposed description	Alliance 4 Freedoms: Scotland Britain Europe
Recommendation	**Reject**

Summary reason	Likely to confuse with a registered party Likely to mislead a voter as to the effect of their vote

60. In making my recommendation I have considered the factors set out in the following paragraphs.

61. As explained above, in considering the requirements of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards, I have sought a translation for this proposed description**: Y Cynghrair dros Ryddid: Yr Alban, Prydain**

62. I have considered the relevance of the translation to each of the relevant statutory tests.

    a. The record of the translation can be found here.

63. As my recommendation is that the proposed name is likely to confuse a voter and mislead a voter to the effect of their vote, I have not considered the statutory tests at this stage. If the delegated decision maker is satisfied that this amounts to a description under PPERA, the rest of the requirements will be considered at that point.

Description 7

Proposed description	Alliance 4 Freedoms: replace Electoral Commission
Recommendation	**Reject**
Summary reason	Likely to confuse with a registered party Likely to mislead a voter as to the effect of their vote

64. In making my recommendation I have considered the factors set out in the following paragraphs.

65. As explained above, in considering the requirements of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards, I have sought a translation for this proposed description: **Y Cynghrair dros Ryddid: Disodli'r**

66. I have considered the relevance of the translation to each of the relevant statutory tests.

    a. The record of the translation can be found here.

67. As my recommendation is that the proposed name is likely to confuse a voter and mislead a voter to the effect of their vote, I have not considered the statutory tests at this stage. If the delegated decision maker is satisfied that this amounts to a description under PPERA, the rest of the requirements will be considered at that point.

Description 8

Proposed description	Alliance 4 Freedoms: Mayday Save Britain
Recommendation	**Reject**
Summary reason	Likely to confuse with a registered party Likely to mislead a voter as to the effect of their vote

68. In making my recommendation I have considered the factors set out in the following paragraphs.
69. As explained above, in considering the requirements of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards, I have sought a translation for this proposed description: **Y Cynghrair dros Ryddid: Argyfwng, Achubwch Brydain**
70. I have considered the relevance of the translation to each of the relevant statutory tests.
    a. The record of the translation can be found here.

71. As my recommendation is that the proposed name is likely to confuse a voter and mislead a voter to the effect of their vote, I have not considered the statutory tests at this stage. If the delegated decision maker is satisfied that this amounts to a description under PPERA, the rest of the requirements will be considered at that point.

Description 9

Proposed description	Alliance 4 Freedoms: Mind the Gap!
Recommendation	**Reject**
Summary reason	Likely to confuse with a registered party Likely to mislead a voter as to the effect of their vote

72. In making my recommendation I have considered the factors set out in the following paragraphs.
73. As explained above, in considering the requirements of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards, I have sought a translation for this proposed description: **Y Cynghrair dros Ryddid: Gofalwch rhag y Bwlch!**
74. I have considered the relevance of the translation to each of the relevant statutory tests.
    a. The record of the translation can be found here.

75. As my recommendation is that the proposed name is likely to confuse a voter and mislead a voter to the effect of their vote, I have not considered the statutory tests at this stage. If the delegated decision maker is satisfied that this amounts to a description under PPERA, the rest of the requirements will be considered at that point.

Description 10

Proposed description	Alliance 4 Freedoms: rejoin EU
Recommendation	**Reject**
Summary reason	Likely to confuse with a registered party Likely to mislead a voter as to the effect of their vote

76. In making my recommendation I have considered the factors set out in the following paragraphs.

77. As explained above, in considering the requirements of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards, I have sought a translation for this proposed description: **Y Cynghrair dros Ryddid: Ailymuno â'r UE**

78. I have considered the relevance of the translation to each of the relevant statutory tests.

    a. The record of the translation can be found here.

79. As my recommendation is that the proposed name is likely to confuse a voter and mislead a voter to the effect of their vote, I have not considered the statutory tests at this stage. If the delegated decision maker is satisfied that this amounts to a description under PPERA, the rest of the requirements will be considered at that point.

Emblems

Emblem 1

Proposed emblem	 

Recommendation	**Reject**
Summary reason	Likely to confuse with a registered party Likely to mislead a voter as to the effect of their vote

80. In making my recommendation I have considered the factors set out in the following paragraphs.

81. As explained above, in considering the requirements of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards, I have sought a translation for the text contained in this proposed emblem: Y Cynghrair dros Ryddid / Y Cynghrair dros Ryddfreiniau.

82. I have considered the relevance of the translation to each of the relevant statutory tests.

    a. The record of the translation can be found here.

83. As my recommendation is that the proposed name is likely to confuse a voter and mislead a voter to the effect of their vote, I have not considered the statutory tests at this stage. If the delegated decision maker is satisfied that this amounts to a description under PPERA, the rest of the requirements will be considered at that point.

Register searches

Table 1: Similarity score results

84. The following table lists identifiers that are similar to the proposed name or descriptions according to an electronic matching process. The higher the value, the higher the similarity.

85. I undertook the search on the GB (England, Scotland, Wales) register.

Proposed ID Marks	ID Mark	Second name/translation	Type	Party registered to	Register	Protected until	Similarity
Alliance 4 freedoms	Freedom Party		Name	Freedom Party	Great Britain	-	0.7034
Alliance 4 freedoms	Freedom Alliance. Independent Britain.		Description	Freedom Alliance- Integrity, Society, Economy	Great Britain	-	0.5274
Alliance 4 freedoms	Alliance for Democracy and Freedom		Name	Alliance for Democracy and Freedom	Great Britain	-	0.5002
Alliance 4 Freedoms: British European Unity	Europeans Party		Name	Europeans Party	Great Britain	30/11/2021 00:00:00	0.7105
Alliance 4 Freedoms: British	All 4 Unity		Description	All For Unity	Great Britain	-	0.6171

European Unity							
Alliance 4 Freedoms: promoting British unity	All 4 Unity		Description	All For Unity	Great Britain	-	0.6163
Alliance 4 Freedoms: promoting European unity	Europeans Party		Name	Europeans Party	Great Britain	30/11/2021 00:00:00	0.7077
Alliance 4 Freedoms: promoting European unity	All 4 Unity		Description	All For Unity	Great Britain	-	0.6132
Alliance 4 Freedoms: European People's Party	Europeans Party		Name	Europeans Party	Great Britain	-	0.6132
Alliance 4 Freedoms: European People's Party	Freedom Party		Name	Freedom Party	Great Britain	-	0.8336
Alliance 4 Freedoms: European People's Party	Propel		Name	Propel	Great Britain	-	0.8096
Alliance 4 Freedoms:	Alliance 4 Freedoms:		Description	Alliance EPP (European	Great Britain	-	0.7192

European People's Party	European People's Party			People's Party) UK			
Alliance 4 Freedoms: European People's Party	Alliance 4 Freedoms: European People's Party		Name	Alliance EPP (European People's Party) UK	Great Britain	-	0.6282
Alliance 4 Freedoms: European People's Party	Alliance 4 Freedoms: European People's Party		Name	Christian Peoples Alliance	Great Britain	-	0.6030
Alliance 4 Freedoms: European People's Party	Freedom Party Candidate		Description	Freedom Party	Great Britain	-	0.5574
Alliance 4 Freedoms: European People's Party	UK Freedom Party		Description	Freedom Party	Great Britain	-	0.5574
Alliance 4 Freedoms: European People's Party	Freedom Alliance. People Matter		Description	Freedom Alliance- Integrity, Society, Economy	Great Britain	-	0.5223
Alliance 4 Freedoms: European People's Party	Freedom Alliance. Independent Britain.		Description	Freedom Alliance- Integrity, Society, Economy	Great Britain	-	0.7547

Alliance 4 Freedoms: European People's Party	Freedom Party		Name	Freedom Party	Great Britain	-	0.6733
Y Cynghrair dros Ryddid	Alliance for Europe	Cynghrair dros Ewrop	Name	Alliance for Europe	Great Britain	-	0.522
Y Cynghrair dros Ryddfreiniau	Alliance for Europe	Cynghrair dros Ewrop	Name	Alliance for Europe	Great Britain	-	0.5220
Alliance 4 Freedoms: Mayday Save Britain	UKIP Save Britain	-	Description	UK Independence Party (UKIP)	Great Britain	-	0.5864
Alliance 4 Freedoms: rejoin EU	Rejoin EU	-	Name	Rejoin EU	Great Britain	-	0.8953
Alliance 4 Freedoms: rejoin EU	Remain ! UK EU Party	-	Description	UK European Union Party (UKEUP)	Great Britain	-	0.6300

Table 2: Identity marks that contain words in the proposed identity marks

86. I have conducted a search to identify where words contained in the proposed descriptions and emblems appear on the registers.

87. I undertook the searches on the GB (England, Scotland, Wales) register.

88. The following words do not appear on the relevant register: freedoms, dros, Ryddid, Ewropeaidd, yrwyddo, Disodli'r Comisiwn Etholiadol â'r, UE, Gofalwch rhag y Bwlch!, rydain

Word searched for: Alliance			
ID Mark	**Second name / translation**	**Type**	**Party registered to**
Alliance	-	Description	Alliance - Alliance Party of Northern Ireland
Alliance - Alliance Party of Northern Ireland	-	Name	Alliance - Alliance Party of Northern Ireland
Alliance Party	-	Description	Alliance - Alliance Party of Northern Ireland
Alliance Party - Shared Future	-	Description	Alliance - Alliance Party of Northern Ireland
Alliance Party First Candidate	-	Description	Alliance - Alliance Party of Northern Ireland
Alliance Party of Northern Ireland	-	Description	Alliance - Alliance Party of Northern Ireland
Alliance Party Second Candidate	-	Description	Alliance - Alliance Party of Northern Ireland
Alliance Party Third Candidate	-	Description	Alliance - Alliance Party of Northern Ireland
Alliance Works - Tribal Politics Doesn't	-	Description	Alliance - Alliance Party of Northern Ireland
Cross-Community Alliance Party	-	Description	Alliance - Alliance Party of Northern Ireland
The Alliance Party	-	Description	Alliance - Alliance Party of Northern Ireland

The Alliance Party of Northern Ireland	-	Description	Alliance - Alliance Party of Northern Ireland
Alliance EPP (European People's Party) UK	-	Name	Alliance EPP (European People's Party) UK
Alliance for Democracy and Freedom	-	Name	Alliance for Democracy and Freedom
Alliance for Europe	Cynghrair dros Ewrop	Name	Alliance for Europe
Alliance for Europe in Wales	Cynghrair dros Ewrop yng Nghymru	Description	Alliance for Europe
The Alliance for Europe Candidate	-	Description	Alliance for Europe
Alliance For Green Socialism	-	Name	Alliance For Green Socialism
Alliance For Local Living (ALL)	-	Name	Alliance For Local Living (ALL)
Alliance for Local Living Independent Candidate.	-	Description	Alliance For Local Living (ALL)
Alliance for London	-	Name	Alliance for London
Alliance for London: all Londoners Together	-	Description	Alliance for London
Alliance for London: London in Europe	-	Description	Alliance for London
Alliance for London: Londoners First	-	Description	Alliance for London
Alliance for London: Londoners in Europe	-	Description	Alliance for London
Alliance for London: the London Party	-	Description	Alliance for London
Alliance for London: the Londoners' Party	-	Description	Alliance for London
Andover Alliance	-	Name	Andover Alliance
Christian Peoples Alliance	-	Name	Christian Peoples Alliance
Christian Peoples Alliance - Cynghrair Pobl Gristnogol	-	Description	Christian Peoples Alliance
Christian Peoples Alliance - Supporting Traditional Marriage	-	Description	Christian Peoples Alliance
Alliance of East Devon Independents	-	Description	East Devon Alliance
East Devon Alliance	-	Name	East Devon Alliance

East Devon Alliance of Independents	-	Description	East Devon Alliance
East Devon Alliance: Working for you	-	Description	East Devon Alliance
East Devon Independent Alliance	-	Description	East Devon Alliance
Independent East Devon Alliance	-	Description	East Devon Alliance
Alliance Party For Harlow	-	Description	Harlow Alliance Party
Alliance Party of Harlow	-	Description	Harlow Alliance Party
Harlow Action Alliance Party	-	Description	Harlow Alliance Party
Harlow Alliance Party	-	Name	Harlow Alliance Party
Harlow Alliance Party (People's Initiative)	-	Description	Harlow Alliance Party
Harlow Alliance Party People's Initiative (H.A.P.P.I.)	-	Description	Harlow Alliance Party
Harlow Residents Alliance Party	-	Description	Harlow Alliance Party
The Alliance Party For Harlow	-	Description	Harlow Alliance Party
The Alliance Party of Harlow	-	Description	Harlow Alliance Party
The Harlow Alliance Party	-	Description	Harlow Alliance Party
Independent Alliance – South Tyneside	-	Name	Independent Alliance – South Tyneside
Independent Alliance (Kent)	-	Name	Independent Alliance (Kent)
Local Alliance	-	Name	Local Alliance
People Before Profit Alliance	-	Name	People Before Profit Alliance
People Before Profit Alliance	-	Description	People Before Profit Alliance
Scottish Democratic Alliance	-	Name	Scottish Democratic Alliance
Socialist Alliance	-	Name	Socialist Alliance
Tunbridge Wells Alliance	-	Name	Tunbridge Wells Alliance
Freedom Alliance- Integrity, Society, Economy	-	Name	Freedom Alliance- Integrity, Society, Economy
South Devon Alliance		Name	South Devon Alliance
Alliance for Democracy and Freedom ADF	-	Description	Alliance for Democracy and Freedom

Alliance for Democracy and Freedom Bradford	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Doncaster	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Durham	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Hartlepool	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Herefordshire	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Hull	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Lincolnshire	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Salford	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Sedgefield	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Wakefield	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Warrington	-	Description	Alliance for Democracy and Freedom
Alliance For Green Socialism - Save NHS	-	Description	Alliance For Green Socialism
Alliance for Green Socialism - Save Homes	-	Description	Alliance For Green Socialism
Alliance For Green Socialism - Save Schools	-	Description	Alliance For Green Socialism
Alliance for Green Socialism - LGBT	-	Description	Alliance For Green Socialism
Alliance for Green Socialism - Environmental Socialists	-	Description	Alliance For Green Socialism
Alliance for Green Socialism and Environment	-	Description	Alliance For Green Socialism
Alliance for Green Socialism - Ecological Socialists	-	Description	Alliance For Green Socialism
Green Socialists - The Left Green Alliance	-	Description	Alliance For Green Socialism

Freedom Alliance. Dignity and Democracy	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. The Real Alternative	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Make Britain Free.	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Supporting Medical Freedom.	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. No Lockdowns. No Curfews.	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Supporting Personal Freedom	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Independent Britain.	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Personal Liberty and Freedom	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Make Scotland Free	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. People Matter	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Liberty, Equality and Justice	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Scotland's Opposition to Lockdown	-	Description	Freedom Alliance- Integrity, Society, Economy

Word searched for: 4			
ID Mark	**Second name / translation**	**Type**	**Party registered to**
All 4 Unity	-	Description	All For Unity
All 4 Unity - No to separatism	-	Description	All For Unity

Word searched for: Freedoms			
ID Mark	**Second name / translation**	**Type**	**Party registered to**
Alliance for Democracy and Freedom	-	Name	Alliance for Democracy and Freedom
Freedom Party	-	Name	Freedom Party
Freedom Party Candidate	-	Description	Freedom Party
UK Freedom Party	-	Description	Freedom Party
Scottish Democrats Freedom & Equality	-	Description	Scottish Democrats
The For Britain Movement, For Freedom	-	Description	The For Britain Movement
Vanguard Party championing Freedom of Speech	-	Description	Vanguard Party
Freedom Alliance- Integrity, Society, Economy	-	Name	Freedom Alliance- Integrity, Society, Economy
Alliance for Democracy and Freedom ADF	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Bradford	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Doncaster	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Durham	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Hartlepool	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Herefordshire	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Hull	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Lincolnshire	-	Description	Alliance for Democracy and Freedom

Alliance for Democracy and Freedom Salford	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Sedgefield	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Wakefield	-	Description	Alliance for Democracy and Freedom
Alliance for Democracy and Freedom Warrington	-	Description	Alliance for Democracy and Freedom
Freedom Alliance. Dignity and Democracy	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. The Real Alternative	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Make Britain Free.	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Supporting Medical Freedom.	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. No Lockdowns. No Curfews.	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Supporting Personal Freedom	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Independent Britain.	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Personal Liberty and Freedom	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Make Scotland Free	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. People Matter	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Liberty, Equality and Justice	-	Description	Freedom Alliance- Integrity, Society, Economy
Freedom Alliance. Scotland's Opposition to Lockdown	-	Description	Freedom Alliance- Integrity, Society, Economy

Word searched for: Cynghrair			
ID Mark	**Second name / translation**	**Type**	**Party registered to**
Christian Peoples Alliance - Cynghrair Pobl Gristnogol	-	Description	Christian Peoples Alliance
Cynghrair Pobl Gristnogol	-	Description	Christian Peoples Alliance

Word searched for: Undod			
ID Mark	**Second name / translation**	**Type**	**Party registered to**
Unity For Peace And Socialism	Undod Am Heddwch A Sosialaeth	Name	Unity For Peace And Socialism

Word searched for: Prydeinig			
ID Mark	**Second name / translation**	**Type**	**Party registered to**
Democrataidd Prydeinig	British Democrats	Description	British Democratic Party
Plaid Democratiadd Prydeinig	British Democratic Party	Description	British Democratic Party

Word searched for: Ewrop			
ID Mark	**Second name / translation**	**Type**	**Party registered to**
Alliance for Europe	Cynghrair dros Ewrop	Name	Alliance for Europe
Alliance for Europe in Wales	Cynghrair dros Ewrop yng Nghymru	Description	Alliance for Europe

Word searched for: Plaid			
ID Mark	**Second name / translation**	**Type**	**Party registered to**
Plaid Democratiadd Prydeinig	British Democratic Party	Description	British Democratic Party
British National Party - Plaid Genedlaethol Brydeinig	-	Description	British National Party
Gwlad – Plaid Annibyniaeth Cymru	Gwlad – The Welsh Independence Party	Description	Gwlad
Gwlad – Plaid Diddymu San Steffan	Gwlad – The Abolish Westminster Party	Description	Gwlad
Plaid Cymru - The Party of Wales	-	Name	Plaid Cymru - The Party of Wales
Plaid Cymru - Your Local Party	Plaid Cymru - Eich Plaid Leol Chi	Description	Plaid Cymru - The Party of Wales
Plaid Cymru - For All of Wales	Plaid Cymru - Dros Gymru Gyfan	Description	Plaid Cymru - The Party of Wales
Plaid Cymru: Llais Sir Gâr	Plaid Cymru: Carmarthenshire's Voice	Description	Plaid Cymru - The Party of Wales
Plaid Cymru: Achub ein Hysbyty	Plaid Cymru: Save our Hospital	Description	Plaid Cymru - The Party of Wales
Plaid Cymru - Voice of the North	Plaid Cymru - Llais y Gogledd	Description	Plaid Cymru - The Party of Wales
Plaid Cymru - Plaid Cymru Newydd	Plaid Cymru - New Wales Party	Description	Plaid Cymru - The Party of Wales
Plaid Cymru: O Blaid Cymru	Plaid Cymru - Vote for Wales	Description	Plaid Cymru - The Party of Wales
Plaid Cymru - The Party of Wales	-	Description	Plaid Cymru - The Party of Wales

Word searched for: Pobl			
ID Mark	**Second name / translation**	**Type**	**Party registered to**
Christian Peoples Alliance - Cynghrair Pobl Gristnogol	-	Description	Christian Peoples Alliance
Cynghrair Pobl Gristnogol	-	Description	Christian Peoples Alliance

Word searched for: Achubwch			
ID Mark	**Second name / translation**	**Type**	**Party registered to**
Green Party - Save Our Green Space	Plaid Werdd – Achubwch Ein Mannau Gwyrdd	Description	Green Party

Public comments

All comments are original and verbatim.

	Comment
DATE - NAME	Copy of text.

Commented [redacted] Arrange in date order, oldest to newest

Go to contents

---------- Original Message ----------
From: [redacted]
Received: 29/04/2021 13:11
To: [redacted]
Subject: RE: Traslation

Hello [redacted]

Not bad thanks, hope you're well too!

The translation for that would be:

"Y Cynghrair dros Ddemocratiaeth a Rhyddid".

Best regards,

[redacted]

[redacted]

Y Comisiwn Etholiadol, Cymru | The Electoral Commission, Wales
[redacted]
comisiwnetholiadol.org.uk | electoralcommission.org.uk

From: [redacted]
Sent: 29 April 2021 12:35
To: [redacted]
Subject: Traslation

Hey [redacted],

Hope you are well. Could you please translate the following party name for me?

"Alliance for Democracy and Freedom".

Kind regards,

[redacted]

[redacted]

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electoralcommission.org.uk

From: [redacted]
Sent: 20 April 2021 15:14
To: [redacted] <[redacted]>
Subject: RE: translations

Hello [redacted]

I'm not bad, thanks; hope you're well ☺

Here you go:

Identity mark type	English version	Welsh Version	Translator comments
[Name]	Alliance 4 Freedoms	Y Cynghrair dros Ryddid Y Cynghrair dros Ryddfreiniau	In Welsh, the word for 'freedom' doesn't have a plural form, as such, because it is not a quantifiable, concrete noun. The closest translation here therefore literally means 'the Alliance for Freedom', which is very close, if not the same, as the translation for the Freedom Alliance, if I remember correctly. This uses an alternative word for 'freedom' (which also means 'privileges', but is still quite similar to the other party's name, unfortunately)
[Descriptions]	1) Alliance 4 Freedoms: British European Unity 2) Alliance 4 Freedoms: promoting British unity	1) Y Cynghrair dros Ryddid: Undod Prydeinig Ewropeaidd 2) Y Cynghrair dros Ryddid: hyrwyddo undod Prydeinig	

	3) Alliance 4 Freedoms: promoting European unity 4) Alliance 4 Freedoms: European People's Party 5) Alliance 4 Freedoms: Scotland Britain Europe 6) Alliance 4 Freedoms: replace Electoral Commission 7) Alliance 4 Freedoms: Mayday Save Britain 8) Alliance 4 Freedoms: Mind the Gap! 9) Alliance 4 Freedoms: rejoin EU	3) Y Cynghrair dros Ryddid: hyrwyddo undod Ewropeaidd 4) Y Cynghrair dros Ryddid: Plaid Pobl Ewrop 5) Y Cynghrair dros Ryddid: Yr Alban, Prydain, Ewrop 6) Y Cynghrair dros Ryddid: Disodli'r Comisiwn Etholiadol 7) Y Cynghrair dros Ryddid: Argyfwng, Achubwch Brydain 8) Y Cynghrair dros Ryddid: Gofalwch rhag y Bwlch! 9) Y Cynghrair dros Ryddid: Ailymuno â'r UE	

Best regards,

[redacted]

.

[redacted] | [redacted]

Y Comisiwn Etholiadol, Cymru | The Electoral Commission, Wales

[redacted]

comisiwnetholiadol.org.uk | electoralcommission.org.uk

From: [redacted]>
Sent: 20 April 2021 11:39
To: [redacted]>
Subject: translations

HI [redacted],

Hope you are doing well? Could you please provide translations for the below identity marks?

Identity mark type	English version	Welsh Version	Translator comments
[Name]	Alliance 4 Freedoms		
[Descriptions]	1) Alliance 4 Freedoms: British European Unity 2) Alliance 4 Freedoms: promoting British unity 3) Alliance 4 Freedoms: promoting European unity 4) Alliance 4 Freedoms: European People's Party 5) Alliance 4 Freedoms: Scotland Britain Europe 6) Alliance 4 Freedoms: replace Electoral Commission 7) Alliance 4 Freedoms: Mayday Save Britain 8) Alliance 4 Freedoms: Mind the Gap!		

	9) Alliance 4 Freedoms: rejoin EU		

Thank you!

[redacted]

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---------- Original Message ----------
From: [redacted]
Received: 24/05/2021 15:00
To: [redacted]
Subject: FW: Both Unions Party decision

Hi [redacted] – please see the clarification from Louise below.

Would you mind please updating the draft decision letter on the basis of Louise's clarified decision? Could you also make sure that this is tracked to the relevant case in CCM and a short note added to the assessment (a comment to this effect will be fine).

Thanks

[redacted]

From: Louise Edwards
Sent: 24 May 2021 11:19
To: [redacted]
Subject: RE: Both Unions Party decision

Hi [redacted]

I see what you mean about the section on the emblem, although I took it from the use of 'R' in the summary section that a recommendation was being made, to refuse it. I did take a decision, that being to agree with the recommendation and refuse the emblem.

But I wasn't clear about the legal test being applied – apologies. It should be on the basis of the mislead test, because of the decision that the name was confusing. I ran the two tests together in my initial view and that has not helped with the clarity!

Thanks

Louise

From: [redacted]
Sent: 21 May 2021 16:48
To: Louise Edwards [redacted]
Subject: Both Unions Party decision

Hi Louise,

I've been helping [redacted] draft a decision letter for this party which you took a decision on recently (draft decision letter and assessment for reference). Would you be able to clarify something please before we go back to the party?

The decision was taken to refuse the emblem, the basis for which appears to be "because of the likelihood of confusion" (as you state in your initial view).

I admit that it isn't entirely clear from the assessment whether the recommendation was to refuse the emblem or not to take a decision on it. Paragraph 83 states:

> *As my recommendation is that the proposed name is likely to confuse a voter and mislead a voter to the effect of their vote, I have not considered the statutory tests at this stage. If the delegated decision maker is satisfied that this amounts to a description under PPERA, the rest of the requirements will be considered at that point.*

Irrespective of the fact that the recommendation refers to descriptions when it should have been talking about emblems, it is probably right that the emblem should be refused either because a) a decision didn't fall to be granted on it anyway because of the name refusal or b) because, given that the name was refused for confusion, the emblem (which contains the name) would be likely to mislead. The emblem cannot be considered confusing (at least because of the reasons given in the assessment) because emblems can only be considered confusing with other emblems, not with names or descriptions.

Would you mind then confirming please whether you did take a decision on the emblem and, if so, whether the basis was due to it being likely to mislead (on the subsequent basis that the name was deemed to be confusing with several other registered names)?

Happy to talk through on Monday.

Thanks

[redacted]

[redacted]
[redacted]

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