[redacted]

From: FOI
Sent: 01 March 2022 11:29
To: [redacted]
Subject: FOI 008-22 - Response
Attachments: FOI 008-22 documents for release.zip

Dear [redacted],

Our Ref: FOI-008-22

Thank you for your two requests made under the Freedom of Information Act, both dated 2 February 2022. As advised in our acknowledgement of receipt, we have treated them as one request.

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

Your request is shown below followed by our response.

Please provide all correspondence with Business For Scotland, and correspondence with Scotland In Union, ahead of the 2014 independence referendum; the 2015 general election; the 2016 Scottish parliamentary election; 2017 general election; 2019 general election; and 2021 Scottish parliamentary election. This should include emails, or any other electronic correspondence, as well as any minutes or notes from verbal conversations.

Our response is as follows:

We hold the information you have requested.

Business for Scotland

Our correspondence with Business for Scotland at the Scottish independence referendum has previously been subject to a Freedom of Information (FOI) request (FOI 115-15) and has been previously released. However, that file is no longer on our website and the file named ‘BFS file 1’ (attached) contains that correspondence.

Our correspondence with Business for Scotland ahead of the elections in 2015, 2016 and 2017 has been previously released in FOI 023-18.

We had no correspondence with Business for Scotland ahead of the 2019 UK Parliament election.

Our correspondence with Business for Scotland ahead of the 2021 Scottish Parliament election can be found in the attached file named ‘BFS file 2’.

Scotland in Union

All our correspondence with Scotland in Union up to, and including, the 2017 UK Parliament election has been previously released in the following FOI’s:

- FOI 003-18
- FOI 004-18
- FOI 020-18
- FOI 023-18
- FOI 034-18

We had no correspondence with Scotland in Union ahead of the 2019 UK Parliament election.

Our correspondence with Scotland in Union ahead of the 2021 Scottish Parliament election is contained in the file attached, named ‘SIU’.

Exemptions under Section 40 of the FOI Act

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

Information held for the purpose of any investigation
We also hold information which was used for the purposes of assessing allegations that the SNP and Business for Scotland were ‘working together’ in the manner defined in the Scottish Independence Referendum Act 2013. On 15 October 2015 we issued a media statement explaining that we had concluded our assessment and had decided not to investigate this matter.

While this information is relevant to your request, it falls within the scope of exemptions set out in the Freedom of Information Act 2000 and we are not releasing it to you.

Section 30(1) (a) (i) of the Freedom of Information Act provides for exemption from disclosure of information which has been held at any time by a public authority for the purpose of any investigation which the authority has a duty to conduct with a view to it being ascertained whether a person should be charged with an offence. The section 30 exemption applies to information that is held at any time, whether or not the investigation is on-going. This exemption extends to an assessment, as it is a formal enquiry stage of our investigative process.

We consider that disclosure of this information would prejudice the exercise of our statutory functions and our ability to conduct investigations such as in this matter.

Applications of the section 30 and 31 exemption are both subject to the public interest test. There are a number of factors that must be considered and weighed in the balance. These factors are that:

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

- We are robust and fair in our regulatory decisions. We acknowledge that there is a legitimate public interest in carrying out assessments and investigations in an open and transparent way, and in promoting public understanding of the decisions we make as a regulator. These are matters we acknowledge and take into account, including when deciding whether to disclose information, whilst ensuring proper regulation of party political funding.

When this information was first considered for potential disclosure as part of FOI 115-15 we carefully weighed the public interest relating to possible disclosure of the information requested under Sections 30(1) (a) (i), we were satisfied that it was not appropriate at that time to disclose the information which we hold. We were satisfied that maintaining the exemption outweighed the public interest in disclosure.

In light of your request we have considered the public interest again in relation to this release but are satisfied that the exemption remains relevant.

I trust that this information satisfies your request. The Commission strives to be an open, transparent authority, but in some circumstances we cannot responsibly release requested information, and we ask for your understanding in this regard.

If you are not satisfied with this response, please note that the Commission operates a review procedure, details of which can be found on the Commission website at: 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

E-mail

Business for Scotland...

Sent Date 27/01/2015 16:03

E-mail

From [redacted] **Cc**

To [redacted] **Bcc**

Subject Business for Scotland Scottish Independence Referendum Return

Hello [redacted]

Thank you for returning my phone call earlier today. As I mentioned on the phone, there are a few issues with the expenditure return submitted by Business for Scotland for the Scottish Independence Referendum. I suspect that most of these are just a case of figures getting muddled up during IT issues and will be easy to solve.

There is a section of the return that currently reads like this:

Supplier	Value of expenditure
Web Print Shop	£860.16
Web Print Shop	£2,400.00
Wetherby Bed and Breakfast	£1,020.00
Written Words	£129.00
Yes Scotland Shop	£300.00
BfS Staff subsistence and travel	£271.99

However, the invoices you have supplied read like this:

Supplier	Value of expenditure
Web Print Shop (just one invoice supplied)	£1,020.00
Wetherby Bed and Breakfast	No invoice supplied
Written Words	£300.00
Yes Scotland Shop	£271.99
Bfs Staff subsistence and travel	No invoice supplied

As you are probably aware from your work on the return, we only require invoices for expenditures over £200. I suspect that is why you have you not

provided invoices for Wetherby Bed and Breakfast and Bfs Staff subsistence and travel. Would I be correct in thinking that this section of the return should actually read like this:

Supplier	Value of expenditure
Web Print Shop (should appear just once)	£1,020.00
Wetherby Bed and Breakfast	£129.00
Written Words	£300.00
Yes Scotland Shop	£271.99

Could you please confirm or correct these amounts and also let me know the amount spent on "Bfs Staff subsistence and travel"? If this amount was over £200, we will require an invoice.

The other issues with the return are the following:

- **We have three expenditure entries and three invoices for the supplier Dynamic Earth. However, the figures on the return and on the invoices don't match. The figures on the return are:**
  - **£1,374.00**
  - **£1,152.00**
  - **£2,049.75**

  Whereas the values on the invoices are:
  - **£2,198.90**
  - **£1,536.00**
  - **£2,733.76**

- **We are missing an invoice for Johnston Press Falkirk Herald - £1,426.80. A document was supplied for Johnston Cash Processing but it isn't an invoice. There are no dates or values listed, just bank account details to transfer money into.**

- **We are missing an invoice for British Telecommunications Plc - £3,256.57**

- **We have two invoices from Trinity Mirror Publishing Ltd. (£2,400.00 and £860.16) but these expenditures do not appear on the return.**

- **We have two invoices for Flings & Things but only one entry on the return. The two invoices are identical so I suspect it was mistakenly included twice. If so, can you please confirm this?**

- **We have an invoice for Printing.com but this is listed as a notional expenditure and therefore does not require a receipt. I would generally assume that this had been included by mistake. However, the amount on the return and invoice do not match. The value listed on the return is for £1,482.00 whereas the invoice is totalled at £1,538.30. Could you please confirm whether this was a notional expenditure and what it's value was?**

Hopefully you can shed some light on these issues. Please feel free to contact me by email or telephone if you have any questions or concerns.

Many thanks,

[redacted]

The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
www.electoralcommission.org.uk
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Description: Description: http://skynet/dm/Functions/internalcomms/Initiatives/e-news%

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Regarding	Business for Scotland Ltd
Owner	[redacted]
Keywords	
Duration	**Priority** Normal
Due	
Category	**Sub-Category**

PEF Directorate Categories

PEF Parent Category	**PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
image001.png	21,381

1 - 1 of 1 (0 selected) Page 1

Status Reason Sent

E-mail

Changes to the Electo...

Sent Date 15/12/2014 14:56

E-mail

From [redacted] Cc

To [redacted] Bcc [redacted]

Subject Changes to the Electoral Commission's leave to pay guidance CCM:0256388

Dear All

To ensure transparency in paying referendum expenses the Scottish Independence Referendum Act 2013 sets out deadlines for the issuing and payment of invoices. As a permitted participant at the Scottish Independence Referendum you are aware that all invoices relating to referendum expenses must have been received by 18 October and paid no later than 17 November 2014. Paying invoices after the deadline is an offence under Schedule 4 paragraph 15(3)(b) without a reasonable excuse.

The Electoral Commission has amended the Leave to Pay guidance. The guidance now includes additional guidance on applying for leave to pay when an invoice is received on time but not paid within the deadline of 17 November 2014. For more information on Leave to Pay please see our guidance.

If you need to apply for Leave to Pay please use this form:
http://www.electoralcommission.org.uk/__data/assets/pdf_file/0020/170084/FormLTP1_FINAL_290714.pdf

and return it to either:

scotreferendum@electoralcommission.org.uk

or post it to:

The Electoral Commission, Lothian Chambers

59-63 George IV Bridge

Edinburgh, EH1 1RN

If you have any questions on the amended Leave to Pay guidance, do not hesitate to contact me.

Yours sincerely

[redacted]
Referendum Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
www.electoralcommission.org.uk

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Regarding

Owner [redacted]

Keywords

Duration **Priority** **Normal**

Due

Category **Sub-Category**

PEF Directorate Categories

PEF Parent Category **PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	

0 - 0 of 0 (0 selected) Page 1

Status Reason Sent

E-mail

RE: Leave to Pay CCM...

Sent Date 04/12/2014 10:38

E-mail

From [redacted] Cc Business for Scotland Ltd; Gordon MacIntyre-Kemp

To [redacted] [redacted]

Subject RE: Leave to Pay CCM:0256380

Not a problem, [redacted]

[redacted] fill in the return make sure to cross reference the invoice both under 'Disputed Claims' (under 'action' state 'leave to pay granted') and 'Payments made' with the same item number.

Best regards

[redacted]
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
www.electoralcommission.org.uk

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From: [redacted]
Sent: 03 December 2014 20:34
To: [redacted]
Cc: [redacted]
Subject: Re: Leave to Pay CCM:0256380

[redacted]

Thank you for your assistance with this. I will ensure that it is paid before the 11th.

Kind regards
[redacted]

Sent from my iPhone

On 3 Dec 2014, at 16:12, [redacted]@electoralcommission.org.uk> wrote:

[redacted],

Please find attached a letter regarding your application for Leave to Pay.

If you have any questions do not hesitate to contact us.

Yours sincerely

[redacted]
Referendum Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
www.electoralcommission.org.uk

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<Business for Scotland Leave to Pay letter.pdf>

Regarding

Owner [redacted]

Keywords

Duration **Priority** Normal

Due

Category **Sub-Category**

PEF Directorate Categories

PEF Parent Category **PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	

0 - 0 of 0 (0 selected) Page 1

Status Reason **Sent**

The Electoral Commission

[redacted]
Business for Scotland
Clyde Offices
2nd Floor
48 West George Street
Glasgow
G2 1BP

3 December 2014

Dear [redacted]

The Electoral Commission has received an application for leave to pay from Business for Scotland on 24 November 2014 to pay an invoice from Communicate Mailing Solutions Ldt for £4,359.60.

Payment of a claim after 17 November is an offence under the Scottish Independence Referendum Act 2013, Schedule 4 para 15(3)(b) *if payment is made "without reasonable excuse"*. When assessing the application from Business for Scotland the Electoral Commission noted that the invoice had been issued on 22 September and received well ahead of the deadline. We also took into consideration that the Operation's Manager had been transparent about the invoice by contacting us as soon as she received it on 17 November. The reason for failing to pay the invoice before 17 November appears to be due to an administrative error, and not an attempt to circumvent the spending requirements of the Act 2013.

Based on the above the Electoral Commission has decided to grant Business for Scotland leave to pay the invoice to Communicate Mailing Solutions Ltd no late than 11 December 2014.

Yours sincerely

[redacted]

Andy O'Neill
Head of Office – Scotland
[redacted]

The Electoral Commission
Lothian Chambers
59–63 George IV Bridge
Edinburgh EH1 1RN

Tel: 0131 225 0200
Fax: 0131 225 0205
infoscotland@electoralcommission.org.uk
www.electoralcommission.org.uk

E-mail

FW: Leave to pay CC...

Sent Date 25/11/2014 10:51

E-mail

From [redacted] **Cc** Andy O'Neill; Andy O'Neill

To [redacted] **Bcc**

Subject FW: Leave to pay CCM:0216096

For info

-----Original Message-----
From: [redacted]
Sent: 25 November 2014 10:31
To: [redacted]
Cc: [redacted]; Gordon MacIntyre-Kemp
Subject: RE: Leave to pay CCM:0216096

Hi [redacted]

Thanks for this.

As discussed the process for not paying an invoice is different from what I advised originally having spoken to our legal team so apologies for any confusion.

The Commission has no powers under the Scottish Independence Referendum Act 2013 to grant leave to pay when an invoice for referendum expenses has not been paid by 17 November. In these circumstances it would be an offence to pay the invoice and the Commission can impose a civil sanction or the Crown Office can decide to prosecute.

As I mentioned on the phone we have contacted the Crown Office asking if they wish to demit this issue to us. If they agree to this we would open an initial assessment of the case. The assessment would be based on the reasons you gave for non-payment, whether there was any advantage to be gained by non-payment and mitigating factors such as when you informed us of the non-payment and any other information you provided.

The Commission looks to take a proportionate approach to regulation and there would be no exception in this case.

I will contact you again once we have made progress.

Kind Regards

[redacted]

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

From: [redacted] [mailto [redacted]]
Sent: 24 November 2014 12:44
To: [redacted]
Cc: [redacted]; Gordon MacIntyre-Kemp
Subject: RE: Leave to pay

[redacted]

Please find attached leave to pay form and related invoice. As I explained on the phone and in the body of the form, this was purely an administrative error. However, should you require any additional information from me please do not hesitate to contact me.

Kind regards
[redacted]

Regarding	Business for Scotland Ltd
Owner	[redacted]
Keywords	
Duration	**Priority** Normal
Due	
Category	**Sub-Category**

PEF Directorate Categories

PEF Parent Category	**PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	

0 - 0 of 0 (0 selected) Page 1

Status Reason Sent

E-mail

Leave to Pay

Sent Date 18/11/2014 16:07

E-mail

From [redacted] **Cc** Business for Scotland Ltd; Gordon MacIntyre-Kemp;

To [redacted] **Bcc**

Subject Leave to Pay

Hi [redacted]

Thanks for your call.

As I understand it you have an invoice for referendum expenses which was received before 18 October but that has not yet been paid. As you are aware the deadline for paying referendum expenses was yesterday 17 November.

As you say the invoice was received before 18 October you can apply to the Commission for leave to pay the invoice. The links below take you to our guidance on leave to pay and the form you need to fill in.

http://www.electoralcommission.org.uk/__data/assets/pdf_file/0019/170092/Leave-to-pay-guidance.pdf

http://www.electoralcommission.org.uk/__data/assets/pdf_file/0020/170084/FormLTP1_FINAL_290714.pdf

You should tell us when the invoice was received and include a copy of the invoice in your submission. You should also tell us why it was not paid and provide any other information you think would be helpful.

Once you have submitted this We will assess your claim and inform you of our decision within 14 working days.

Kind Regards

[redacted]

[redacted]

Senior Referendum Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN

[redacted]

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Regarding

Owner [redacted]

Keywords

Duration **Priority** Normal

Due

Category **Sub-Category**

PEF Directorate Categories

PEF Parent Category **PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	
0 - 0 of 0 (0 selected)	Page 1

Status Reason Received

E-mail

RE: Follow up to mee...

Sent Date 17/11/2014 16:54

E-mail

From [redacted] **Cc**

To [redacted] [redacted] **Bcc**

Subject RE: Follow up to meeting

Thanks [redacted]

Ian

Kind regards

[redacted]

[redacted]

[redacted]

image001.png [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

From: [redacted]**@electoralcommission.org.uk]**
Sent: 17 November 2014 15:04
To: [redacted]
Cc: Gordon MacIntyre-Kemp; [redacted]
Subject: RE: Follow up to meeting

[redacted] thanks for that.

Sorry for the delay in getting back I was off last week.

You have to put in the address of every supplier my compliance colleagues tell me.

Thanks for confirming your understanding of the meeting.

I said I would come back to you with our consideration of what you need to report in relation to the annual dinner and conference.

The Commission's view is that you should apportion costs for the conference in terms of the assessment you make of what part of it was related to the referendum. This is because based on what you have told us and on the information publicising the event the content was clearly wider than just the referendum.

In terms of the dinner we will require you to apportion the whole cost of the event. This is consistent with advice we have given others who were holding an annual dinner with a high profile political speaker, who supported an outcome in the referendum, in the referendum period.

I hope this is clear but if you need any more information please let me know.

Kind Regards

[redacted]

From: [redacted] [mailto:[redacted]
Sent: 12 November 2014 13:22
To: [redacted]
Cc: Gordon MacIntyre-Kemp; [redacted]
Subject: Fwd: Follow up to meeting

[redacted]

Thank you for your note below. I am happy that this is an accurate account of what we discussed at our meeting. To be clear we did send out a media call for the events, but as far as we are aware we did not get any coverage in the press.

Would you be able to get back to me as to whether we need to manually enter into the form the full address of every supplier who provided goods and services to us during the campaign period. This will be quite time consuming, so we may need to enlist an extra resource.

Please let me know if you need anything else from me.

Kind regards
[redacted]

From: [redacted]
Sent: 03 November 2014 10:46
To: [redacted]Gordon@businessforscotland.co.uk
Cc: [redacted]**; Andy O'Neill**
Subject: Follow up to meeting

Hi [redacted]**/Gordon**

It was good to meet you last week. Also could you pass this on to [redacted] **as I have left his card at home.**

I said I would drop you an email with our understanding of the meeting.

Overall you were happy with the process for reporting and with what referendum spending and donations need to be reported to the Commission.

We discussed the Business for Scotland annual conference which was held at Dynamic Earth on 6 August and the annual dinner held at the Marriot Hotel on 21 August.

You indicated that you were intending to report 50% of the cost of each event as referendum expenditure. This was because you felt that:

- **The events were not solely about the referendum**
- **These were both annual events and you would be intending to hold them on that basis**
- **It was for members only**
- **There was no media coverage of the events and that as far as you could recall you had only out a press release to announce that the dinner had raised around £51,000 for charity**
- **Neither of the events were political rallies and were not designed to convince people to vote in a particular way**

You asked if there was a precedent in terms of what needs to be reported and I highlighted that we had required another campaigner to report the whole cost of a dinner event which was also an annual event and not solely about the referendum. At the same time I said I would discuss your intended approach with colleagues which I will do once you have confirmed that this is a correct understanding of the meeting or if there is anything else you wish to add.

You also confirmed that should the Commission indicate that you need to report the whole cost of the events you would still be within the £150,000 spending limit for registered campaigners.

Kind Regards

[redacted]

[redacted]
Senior Referendum Officer

[redacted]
Senior Referendum Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Regarding	[redacted] Business for Scotland Ltd
Owner	[redacted]
Keywords	
Duration	**Priority** Normal
Due	
Category	**Sub-Category**

PEF Directorate Categories

PEF Parent Category	**PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
image001.png	10,311
image002.png	189

1 - 2 of 2 (0 selected) Page 1

Status Reason Received

E-mail

Re: Tables at event

Sent Date 09/10/2014 10:41

E-mail

From [redacted] **Cc**

To [redacted] [redacted] **Bcc**

Subject Re: Tables at event

Thanks [redacted]

On Thu, Oct 9, 2014 at 10:37 AM, [redacted] electoralcommission.org.uk> wrote:

Hi [redacted]

You were asking yesterday about people buying tables at the Business for Scotland dinner and whether this would be a donation.

I've had a look through our guidance and had a word with colleagues and a purchase of this type would be a donation. There is a section in our paper on Sponsorship **which says:**

"For payments for a place or table at a dinner organised by a party or other regulated organisation or individual, the difference between the value of the dinner and the amount paid is a donation."

If you have a look at our guidance on donations and loans **page 9 you will see how to value donations of this type. Whilst the guidance talks about people buying a ticket for the event we would look at buying a table in the same way. Have a look at the example and swap the 'amount paid for ticket' for amount paid for table.**

Once you have carried out the calculation it will be a donation if it's value is more than £500.

Hope this helps.

[redacted]

[redacted]
Senior Referendum Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
[redacted]
[redacted]
www.electoralcommission.org.uk
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Regarding	Business for Scotland Ltd
Owner	[redacted]
Keywords	
Duration	**Priority** Normal
Due	
Category	**Sub-Category**

PEF Directorate Categories

PEF Parent Category	**PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	

0 - 0 of 0 (0 selected) Page 1

Status Reason	**Received**

E-mail

Re: Reciepts etc

Sent Date 08/10/2014 16:11

E-mail

From [redacted] **Cc**

To [redacted] [redacted] **Bcc**

Subject Re: Reciepts etc

Thanks.

Caroline

On 8 Oct 2014, at 16:10, [redacted]@electoralcommission.org.uk> wrote:

[redacted]

On auctions this may help:

http://www.electoralcommission.org.uk/__data/assets/pdf_file/0010/155566/Expert_Paper_Auction_prizes.pdf

Essentially it will be a donation if the item is worth more than £500. It will also be another donation if the difference between the items worth and what is paid for it is more than £500.

I'll get back to you on your other point about tables.

[redacted]

From: [redacted] **[mailto:** [redacted] **]**
Sent: 08 October 2014 12:17
To: [redacted]
Subject: Re: Reciepts etc

[redacted]

Perfect.

Thanks
[redacted]

On 8 Oct 2014, at 12:16, [redacted]@electoralcommission.org.uk> wrote:

Hi [redacted]

You can send receipts to:

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

Best Wishes

[redacted]

[redacted]
Senior Referendum Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Regarding	Business for Scotland Ltd
Owner	[redacted]

[redacted]

Duration		Priority	Normal
Due			
Category		Sub-Category	

PEF Directorate Categories

PEF Parent Category	PEF Category

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	

0 - 0 of 0 (0 selected) Page 1

Status Reason Received

The Electoral Commission

Mr Gordon MacIntyre-Kemp
Business for Scotland Ltd.
[redacted]

2 October 2014

Dear Mr MacIntyre-Kemp

Reporting spending, donations and loans after the referendum on independence for Scotland

I am writing to you as the responsible person for Business for Scotland Ltd.

As Business for Scotland Ltd. was a permitted participant in the referendum on independence for Scotland you will be aware that you are required to report referendum spending, donations and loans to the Commission.

If your campaign expenditure was £250,000 or less you must report to us by midnight on **18 December 2014**

If your campaign expenditure was more than £250,000 you must report to us by midnight on **18 March 2015.**

If you have spent less than £10,000 during the referendum period you must submit a nil return by **18 December 2015**.

Meeting

It is your responsibility to submit a complete and correct return as required by the Scottish Independence Referendum Act 2013

The Electoral Commission
Lothian Chambers
59–63 George IV Bridge
Edinburgh EH1 1RN

Tel: 0131 225 0200
Fax: 0131 225 0205
infoscotland@electoralcommission.org.uk
www.electoralcommission.org.uk

INVESTOR IN PEOPLE
POSITIVE ABOUT DISABLED PEOPLE

If you have spent £250,000 or less on campaigning we would like to meet you before the end of November 2014 to run through the reporting requirements and to answer any questions that you may have.

If you have spent more than £250,000 we would like to meet with you in December 2014.

To arrange a time to do this can you please contact me on [redacted]@electoralcommission.org.uk or [redacted]

Guidance

Our guidance for campaigners sets out what spending you must report and what you must report in relation to donations and loans. You can see the guidance on spending here:

http://www.electoralcommission.org.uk/__data/assets/pdf_file/0008/164393/to-ref-spending.pdf

Our guidance on donations and loans and the permissibility of donations and can be found at the following links.

http://www.electoralcommission.org.uk/__data/assets/pdf_file/0006/164391/to-ris-ref-donations.pdf

http://www.electoralcommission.org.uk/__data/assets/pdf_file/0007/164392/to-ris-ref-loans.pdf

http://www.electoralcommission.org.uk/__data/assets/pdf_file/0011/164396/sp-ris-permissibility.pdf

You may also wish to look at our expert paper on splitting spending which can be found here:

http://www.electoralcommission.org.uk/__data/assets/pdf_file/0008/155564/Expert_Paper_Splitting_campaign_spending.pdf

Forms

You can find the forms for reporting spending here:

The Electoral Commission

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

Leave to Pay

You must receive all invoices from your suppliers by 18 October. Any invoices received after this date cannot be paid and you will have to apply to us to get permission to pay them. Our guidance on this can be found here:

http://www.electoralcommission.org.uk/__data/assets/pdf_file/0019/170092/Leave-to-pay-guidance.pdf

Yours sincerely

[redacted]
Senior Referendum Officer
[redacted]@electoralcommission.org.uk
[redacted]

E-mail

RE: Meeting

Sent Date 12/09/2014 11:03

E-mail

From [redacted] **Cc** Andy O'Neill; Andy O'Neill; Business for

To [redacted]

Subject RE: Meeting

Hi [redacted]

Happy with this note on our meeting.

Kind regards

[redacted]

On 12 Sep 2014 10:31, "Eddie Follan" <EFollan@electoralcommission.org.uk> wrote:

> **Hi** [redacted]
>
> **Andy says he spoke to you and you were extremely busy.**
>
> **Is there any chance you could take a minute to have a look at this again and drop me an email?**
>
> **Thanks**
>
> [redacted]
>
> ---
>
> **From:** [redacted]
> **Sent: 01 September 2014 10:25**
> **To:** [redacted]@businessforscotland.co.uk)
> **Cc:** [redacted]**; Andy O'Neill**
> **Subject: Meeting**
>
> **Hi** [redacted]

Thanks for meeting with us recently and apologies for the delay in setting this out.

As we said at the meeting we are looking to meet with those campaigners who are involved in significant campaigning.

This is just a quick follow up note outlining what we talked about. Can you let me know that you are happy with our understanding of the meeting.

- **We talked about your various campaign activity and you confirmed that you were within the £150,000 spending limit.**
- **In general you were happy with the support provided by the Commission but that the pre-poll reporting process and, in particular, the forms could be clearer. I said I would feed this back to our team in London and I have done so.**
- **We went over the post poll responsibilities for registered campaigners including reporting and Leave to Pay guidance.**

If there is anything else I can help with or you have any queries please get in touch.

Kind Regards

[redacted]

[redacted]
Senior Referendum Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
[redacted]
[redacted]
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Regarding No Borders Campaign

Owner [redacted]

Keywords

Duration **Priority** Normal

Due

Category **Sub-Category**

PEF Directorate Categories

PEF Parent Category **PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	

0 - 0 of 0 (0 selected) Page 1

Status Reason Received

E-mail

Registration and abse...

Sent Date 01/09/2014 10:30

E-mail

From [redacted] Cc

To Business for Scotland Ltd; Gordon MacIntyre-Kemp Bcc

Subject Registration and absent voting forms CCM:0256084

Dear Mr MacIntyre-Kemp

As a registered campaigner in the referendum on independence for Scotland you may have collected registration forms and absent vote application forms. The deadlines by which these forms have to arrive at each elector's local Electoral Registration Office are set out below:

- **Electoral Registration Forms – must arrive with local Electoral Registration Office by midnight on Tuesday 2 September 2014.**
- **Postal, Proxy and Postal Proxy Application Forms – must arrive with local Electoral Registration Office by 5pm on Wednesday 3 September 2014.**

However, Electoral Registration Offices need time to process applications and sort out, with the elector, any anomalies on the relevant form. The more time they have to do this before the deadlines, the less likely it is that any such anomalies will result in an elector being disenfranchised. Accordingly, we are asking that you pass registration forms and absent voting application forms to the relevant local Electoral Registration Office as soon as possible and do not leave this until right before the deadlines.

Thank you in advance.

[redacted]
Referendum Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
www.electoralcommission.org.uk

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Regarding Business for Scotland Ltd

Owner [redacted]

Keywords

Duration **Priority** Normal

Due

Category **Sub-Category**

PEF Directorate Categories

PEF Parent Category **PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	
0 - 0 of 0 (0 selected)	Page 1

Status Reason Sent

E-mail

FW: Reminder: Pre-p...

Sent Date 27/08/2014 14:22

E-mail

From PEF Inbox **Cc**

To **Bcc** [redacted]

Subject FW: Reminder: Pre-poll 3 return due 28/08/2014

Dear Permitted Participant/Responsible Person,

Don't forget, the deadline for the third pre-poll donations and transactions returns is tomorrow. Remember:

- **These are two separate returns.**
- **You only need to report any donations or loans received over £7,500 in value.**
- **You need to submit a "nil return" even if you have not received any reportable donations or loans.**
- **You can submit these returns using PEF Online, and can email pef@electoralcommission.org.uk if you don't already have a PEF Online account.**

If you have any questions, or need any help submitting your returns you can contact us on 020 7271 0616, or by emailing pef@electoralcommission.org.uk.

Kind regards,

[redacted]

Compliance Officer
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
[redacted]
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Please consider the environment before printing this email.

From: PEF Inbox
Sent: 22 August 2014 12:33
Subject: Reminder: Pre-poll 3 return due 28/08/2014

Dear Permitted Participant/Responsible Person

You can now submit Donation and Transaction reports covering the period 25 July to 21 August. If you are a newly registered campaigner, you must tell us about any donations to, or transactions entered into, by your organisation since 18 December 2013 that exceed the reporting threshold. The reports must be submitted to the Commission by Thursday 28 August, however you do not have to wait until then and we encourage you to complete these returns as soon as possible.

Why we are writing to you

The registered responsible person for a registered campaigner in the referendum on independence for Scotland, is required to submit both a donation and transaction report - even if you haven't received any donations or transactions. The next report is due by Thursday 28 August. This email explains what you need to do and when you must do it.

You should read our guidance to understand what donations and transactions are covered and what information you need to include:

Overview of donations for referendum campaigners
Overview of transactions for referendum campaigners

We do encourage you to use our interactive website, PEF Online, to submit these reports. However, should you require paper forms for reporting, these can be found here.

What do you need to do?

You must submit your reports to us that list any donations that you receive that are over £7,500.

You must also report to us any transactions over £7,500 that you enter into. A regulated transaction is loans of money, credit facilities such as credit cards and overdrafts, and securities or guarantees for your obligations to someone else. If you have not received any reportable donations or entered into any reportable transactions, then you must tell us by sending us a nil return for each reporting period.

When do you need to report?

You must submit pre-poll reports or nil reports by the following dates:

Reporting period in which donations are received or loans entered into	Deadline for pre-poll reports

25 July – 21 August	**Thursday 28 August**
22 August – 5 September	**Friday 12 September**

How do I submit a pre-poll return to the Commission?

We recommend that you complete and submit pre-poll reports online using our interactive website, PEF Online. In order to use the system, the responsible person will need access to the participant's online account. If you do not have an account registered with the Commission, please email pef@electoralcommission.org.uk to request that an account be set up. If you are unable to use the online system you can email, fax or post completed forms to the Commission.

Useful Information

We have produced user guides designed to help you use our online system. There are user guides for submitting nil donation and nil transaction returns:

- Creating and submitting a nil pre-poll donations return online
- Creating and submitting a nil pre-poll transactions return online

If you do have lots of donations to report, you can use an XML file. Alternatively you can use the online system to record various donations and regulated transactions. If you require assistance with using the online facility, please call us and ask to speak to a member of the Compliance Team.

What happens if you do not submit on time?

It is a legal requirement to submit pre-poll reports on time. If you submit your report late, you may be subject to sanctions including a penalty of at least £200. Failure to submit a pre-poll report on time may also result in you being referred to the Commission's Enforcement Team in line with our enforcement policy:

Please ensure that you are aware of these deadlines.

Can We Help?

If you have any queries regarding the content of this letter, or about submitting your pre-poll reports, please contact a member of the Commission's Compliance Team:

- [redacted]

Alternatively you can contact our Party & Election finance advice line on 020 7271 0616 or email pef@electoralcommission.org.uk

Yours sincerely

[redacted]
Compliance Manager
Party and Election Finance
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
[redacted]
www.electoralcommission.org.uk

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Please consider the environment before printing this email

Regarding [redacted]

Owner [redacted]

Keywords

Duration **Priority** Normal

Due

Category **Sub-Category**

PEF Directorate Categories

PEF Parent Category **PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	

0 - 0 of 0 (0 selected) Page 1

Status Reason Sent

E-mail

Notification of Appoi...

Sent Date 08/08/2014 17:17

E-mail

From ScotReferendum Cc

To Bcc [redacted]

Subject Notification of Appointment of Referendum Agents for the Referendum on Independence for Scotland - REMINDER CCM:0220171

Dear Responsible Person,

Further to my previous e-mail to you as shown below, I am writing to remind you that the deadline by which you must notify counting officers of the appointment of referendum agents is noon on Thursday 14 August 2014.

Please be aware that an original hard copy of the attached form must be provided to the counting officer by the deadline – an electronic copy alone is not sufficient.

Yours sincerely,

[redacted]
Senior Electoral Practice and Performance Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
www.electoralcommission.org.uk

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Please consider the environment before printing this email.

Dear Responsible Person,

I am writing to you on behalf of the Chief Counting Officer in your capacity as the named responsible person for a registered permitted participant in the referendum on independence for Scotland.

As you may be aware, each permitted participant is entitled to appoint a referendum agent for each of the 32 local counting areas, who will be entitled to do the following:

- **Attend the receipt and opening of postal ballot papers and/or appoint postal ballot agents to do so on their behalf.**
- **Attend polling stations on polling day for the purpose of detecting personation and/or appoint polling agents to do so on their behalf.**
- **Attend the counting of votes and/or appoint counting agents to do so on their behalf.**

To appoint a referendum agent for each local counting area, the responsible person must provide notification in writing to the counting officer for that area and I have attached a form for this purpose. An original hard copy of the form must be provided to the counting officer; a scanned copy sent by e-mail alone is not sufficient to satisfy this requirement, although you may send an electronic copy in addition to a hard copy if you wish.

The notification must be signed by the responsible person and must be provided to the counting officer before noon on 14 August 2014. After this time, it will not be possible for permitted participants to appoint referendum agents and, if no referendum agent has been appointed in any local counting area, the permitted participant in question will not be able to appoint postal ballot agents, polling agents or counting agents for that area.

It is possible for the attached notification form to be signed by someone other than the responsible person. However, any notification form completed in this manner must be accompanied by a written declaration from the responsible person, authorising the person who has signed the form to discharge their duties on their behalf.

You may appoint the same referendum agent for more than one local counting area and you can have the same referendum agent for all 32 local counting areas if you wish. However, you must still send a separate notification form to the counting officer in each counting area. The postal address for each counting officer is included on the attached contact details document and this is the address your forms should be sent to. Please do not send these forms to the Electoral Commission, as we will not be able to process them on your behalf.

If you have any questions about the notification process, please contact the Chief Counting Officer's team at [redacted] If you have any questions about local arrangements, please contact the relevant Counting Officer using the details on the attached contact sheet.

Yours sincerely,

[redacted]

Senior Electoral Practice and Performance Officer

The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
www.electoralcommission.org.uk

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Regarding

Owner [redacted]

Keywords

Duration **Priority** Normal

Due

Category **Sub-Category**

PEF Directorate Categories

PEF Parent Category **PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
Counting Officers Contact Details.doc	108,546
Form 6b - Notification of Appointment of Referendum Ag...	42,498

1 - 2 of 2 (0 selected) Page 1

Status Reason Sent

E-mail

Scottish Independenc...

Sent Date 04/08/2014 12:21

E-mail

From ScotReferendum **Cc**

To **Bcc** [redacted]

Subject Scottish Independence Referendum: Authorising Release of Contact Information to Counting Officers and Electoral Registration Officers CCM:0220164

Dear Responsible Person,

I am writing to you in your capacity as the named responsible person for a registered permitted participant in the referendum on independence for Scotland.

As we move closer to polling day, there are several aspects of the referendum process which may require you to contact Electoral Registration Officers (EROs), Counting Officers (COs) and their respective teams. Likewise, EROs and COs may require to contact you. For example:

- **EROs have been receiving requests from permitted participants for a copy of the register of local government electors. When these requests are not received from the nominated responsible person, the ERO may need to check that the request is genuine.**
- **COs may require to correspond with permitted participants in relation to arrangements for matters such as the appointment of referendum agents (further to my recent e-mail to you).**

The contact information which is publicly displayed on the Electoral Commission's register of permitted participants is limited to the name of the responsible person and the registered postal address for the permitted participant; e-mail addresses and telephone numbers are not shown. For the purposes of administrative matters, such as those mentioned above, it would likely be beneficial to all parties if EROs and COs has access to full contact details for the responsible person.

For data protection reasons, the Commission cannot use certain information for any purpose other than that for which it was collected. With this in mind, I would be grateful if you could reply to this e-mail as soon as possible to confirm you are content for the Commission to release the following information to EROs, COs and their respective teams only:

- **E-Mail address for the responsible person.**
- **Telephone number for the responsible person.**

In order to receive this information, all EROs and COs will be required to confirm they will use this information solely for purposes in relation to the administration of the referendum on independence for Scotland and will manage the information appropriately in accordance with the Data Protection Act.

Please be aware that, without your authority, the Commission cannot release this information to EROs and COs. Accordingly, this may affect the ability of the EROs and COs to deal with any correspondence from you, or sent on your behalf, in relation to the referendum.

If you have any queries with regard to this e-mail, please do not hesitate to contact me by telephone on [redacted] or by e-mail at [redacted]@electoralcommission.org.uk.

Yours sincerely,

[redacted]
Senior Electoral Practice and Performance Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
www.electoralcommission.org.uk

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Regarding	The Referendum on Independence for Scotland 2014
Owner	[redacted]
Keywords	
Duration	**Priority** Normal
Due	
Category	**Sub-Category**

PEF Directorate Categories

PEF Parent Category	**PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	

0 - 0 of 0 (0 selected) Page 1

Status Reason Sent

E-mail

Notification of Appoi...

Sent Date 18/07/2014 17:26

E-mail

From ScotReferendum Cc

To Bcc [redacted]

Subject Notification of Appointment of Referendum Agents for the Referendum on Independence for Scotland - CORRECTION CCM:0220150

Dear Responsible Person,

I am writing to correct an error contained in my e-mail to you of 17 July 2014 (attached).

My e-mail incorrectly stated that referendum agents, or postal ballot agents appointed by referendum agents, could attend the issue of postal ballot papers. In fact, only counting officers , their staff, Electoral Commission representatives and accredited observers may attend the issue of postal ballot papers as per Schedule 2, Paragraph 20(1) of the Scottish Independence Referendum Act 2013. However, referendum agents, or postal ballot agents appointed by referendum agents, may attend the receipt and opening of postal ballot papers.

Please accept my apologies for any confusion caused by the error in my original e-mail.

Yours sincerely,

[redacted]
Senior Electoral Practice and Performance Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
www.electoralcommission.org.uk

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Please consider the environment before printing this email.

From: ScotReferendum
Sent: 17 July 2014 18:05
Subject: Notification of Appointment of Referendum Agents for the Referendum on Independence for Scotland CCM:0220149

Dear Responsible Person,

I am writing to you on behalf of the Chief Counting Officer in your capacity as the named responsible person for a registered permitted participant in the referendum on independence for Scotland.

As you may be aware, each permitted participant is entitled to appoint a referendum agent for each of the 32 local counting areas, who will be entitled to do the following:

- **Attend the issue, receipt and opening of postal ballot papers and/or appoint postal ballot agents to do so on their behalf.**
- **Attend polling stations on polling day for the purpose of detecting personation and/or appoint polling agents to do so on their behalf.**
- **Attend the counting of votes and/or appoint counting agents to do so on their behalf.**

To appoint a referendum agent for each local counting area, the responsible person must provide notification in writing to the counting officer for that area and I have attached a form for this purpose. An original hard copy of the form must be provided to the counting officer; a scanned copy sent by e-mail alone is not sufficient to satisfy this requirement, although you may send an electronic copy in addition to a hard copy if you wish.

The notification must be signed by the responsible person and must be provided to the counting officer before noon on 14 August 2014. After this time, it will not be possible for permitted participants to appoint referendum agents and, if no referendum agent has been appointed in any local counting area, the permitted participant in question will not be able to appoint postal ballot agents, polling agents or counting agents for that area.

It is possible for the attached notification form to be signed by someone other than the responsible person. However, any notification form completed in this manner must be accompanied by a written declaration from the responsible person, authorising the person who has signed the form to discharge their duties on their behalf.

You may appoint the same referendum agent for more than one local counting area and you can have the same referendum agent for all 32 local counting areas if you wish. However, you must still send a separate notification form to the counting officer in each counting area. The postal address for each counting officer is included on the attached contact details document and this is the address your forms should be sent to. Please do not send these forms to the Electoral Commission, as we will not be able to process them on your behalf.

If you have any questions about the notification process, please contact the Chief Counting Officer's team at [redacted]. If you have any questions

about local arrangements, please contact the relevant Counting Officer using the details on the attached contact sheet.

Yours sincerely,

[redacted]
Senior Electoral Practice and Performance Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
www.electoralcommission.org.uk

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Regarding

Owner [redacted]

Keywords

Duration **Priority** **Normal**

Due

Category **Sub-Category**

PEF Directorate Categories

PEF Parent Category **PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	

0 - 0 of 0 (0 selected) Page 1

Status Reason	**Sent**

E-mail

Re: Campaign Material

Sent Date 27/05/2014 18:51

E-mail

From [redacted] Cc [redacted]

To [redacted] Bcc

Subject Re: Campaign Material

Thanks [redacted] Can you clarify whether or not the postcode and date of printing has to be included?

Thanks.

[redacted]
On 27/05/2014 16:47, [redacted] wrote:

> [redacted] that looks fine as it is.
>
> Eddie

From: [redacted] **| Business for Scotland**
[redacted]
Sent: 27 May 2014 16:08
To: [redacted]
Subject: Re: Campaign Material

Hi [redacted]

Can I just double check what the exact wording has to be.

Promoted by Gordon MacIntyre-Kemp, Business for Scotland, 290 Bath Street, Glasgow, G2 4JR, printed by Printing.com, 995 Argyle Street, Glasgow, 27 May 2014. Do we have to include postcode and the date the material was printed?

[redacted]
On 27/05/2014 14:32, [redacted] wrote:

> Hi [redacted]
>
> Its fine to use these leaflets if you put the relevant details on manually.
>
> If you could scan a leaflet and send it to me that would be helpful. Its really just if someone complains and we know which leaflet we have said its acceptable to do this with.

Hope that helps but get in touch if you need anything else.

Kind Regards

[redacted]

From: [redacted] **| Business for Scotland** [redacted]]
Sent: 27 May 2014 12:09
To: infoscotland
Subject: Campaign Material

For the attention of Eddie:

We have around 300 leaflets that we would like to use in the short period. Unfortunately the leaflets do not have the promoted by, printed by etc information on them. I have made enquiries and it would appear that it would not be possible to feed the leaflets through a printer to rectify this. Alternatively, we could print 300 labels (89mm x 10mm) and adhere the labels with the information onto the leaflets manually. Would this be permissable under the rules?

--
[redacted]

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cid:i c

www.businessforscotland.co.uk

bfslogo (250x97)
(150x58)

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The contents of any e-mail and related attachment may contain software viruses, which could damage your own computer system. Whilst Business for Scotland has taken every reasonable precaution to minimise the risk, we cannot accept liability for any damage which you sustain as a result of software viruses. You should carry out your own virus checks before opening the email or attachment.

--

[redacted]

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--

[redacted]

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(150x58)

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Regarding Business for Scotland Ltd

Owner [redacted]

Keywords

Duration **Priority** Normal

Due

Category **Sub-Category**

PEF Directorate Categories

PEF Parent Category **PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
ATT00001.png	1,584
ATT00002.jpg	1,260
ATT00003.jpg	44,496
ATT00004.png	1,584
ATT00005.jpg	1,260
ATT00006.jpg	44,496

1 - 6 of 6 (0 selected) Page 1

Status Reason Received

E-mail

Staff

Sent Date 20/05/2014 15:07

E-mail

From [redacted] Cc

To [redacted] Bcc

Subject Staff

Hi [redacted]

Apologies again for the delay in coming back to you.

As I suggested on the phone yesterday our position is that only people in an employment relationship (whether temporary or permanent) are covered by the exclusion in the legislation. Campaigners are required to report their spending on consultants and independent contractors.

If you need anything else don't hesitate to get in touch.

Best Wishes

[redacted]

[redacted]
Senior Referendum Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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Please consider the environment before printing this email.

Regarding [redacted] Business for Scotland Ltd

Owner

Keywords

Duration **Priority** Normal

Due

Category **Sub-Category**

PEF Directorate Categories

PEF Parent Category **PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	

0 - 0 of 0 (0 selected) Page 1

Status Reason Sent

E-mail

RE: AD01

Sent Date 14/05/2014 16:36

E-mail

From [redacted] Cc

To [redacted] [redacted] Bcc

Subject RE: AD01

[redacted]

Please find attached completed AD01 form, as promised. It will be in the post to the registrar tonight.

Thank you for your patience.

Kind regard

[redacted]

cid:C426DCDC-EE8D-4C4D-AD2D-EB98665622D3

Business for Scotland (BFS) is a trading name of Business for Scotland Limited, a company limited by guarantee, registered in Scotland SC430989.

Business for Scotland may monitor and read all e-mails as it is presumed that they are sent or received in connection with Business for Scotland. BFS also monitors e-mails for security reasons to ensure that there is no unauthorised disclosure of Business for Scotland's confidential information is passed via the e-mail system.

This email and any attachments are confidential. It is intended for the recipient only. If you are not the intended recipient, any use, disclosure, distribution, printing or copying of this email is unauthorised. If you have received this e-mail in error, please immediately notify the sender by replying to this e-mail and delete the email from your computer.

The contents of any e-mail and related attachment may contain software viruses, which could damage your own computer system. Whilst Business for Scotland has taken every reasonable precaution to minimise the risk, we cannot accept liability for any damage which you sustain as a result of software viruses. You should carry out your own virus checks before opening the email or attachment.

Regarding	Business for Scotland Ltd		
Owner	[redacted]		
Keywords			
Duration		**Priority**	Normal
Due			
Category		**Sub-Category**	

PEF Directorate Categories

PEF Parent Category	**PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
photo.JPG	573,864

1 - 1 of 1 (0 selected) Page 1

Status Reason Received

E-mail

Re: Office Address

Sent Date 14/05/2014 12:40

E-mail

From [redacted] [redacted]

[redacted] [redacted] [redacted] **Bcc**

Subject Re: Office Address

[redacted]

It was lovely to meet you yesterday and I really enjoyed our meeting. Finding out more about the EC rules and regulations was fascinating and no doubt we will be speaking again over the coming months.

Sorry I ended up getting caught up in a few other matters yesterday. It's on my list for this afternoon. I will get it through to you by the end of the day.

Thank you in advance for you patience.

Kind regards

[redacted]

Business for Scotland (BFS) is a trading name of Business for Scotland Limited, a company limited by guarantee, registered in Scotland SC430989.

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The contents of any e-mail and related attachment may contain software viruses, which could damage your own computer system. Whilst Business for Scotland has taken every reasonable precaution to minimise the risk, we cannot accept liability for any damage which you sustain as a result of software viruses. You should carry out your own virus checks before opening the email or attachment.

On 14 May 2014, at 12:04, Eddie Follan <EFollan@electoralcommission.org.uk> wrote:

Hi [redacted]

Good to meet you on Monday and hope the dinner went well.

I have a couple of things to get back to you on and will do that shortly.

You mentioned you will send me something confirming you asked Companies House to change the registered address. Could you send something over when you get a chance.

Many thanks

[redacted]

[redacted]
Senior Referendum Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh EH1 1RN
[redacted]
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

Putting voters first

Please consider the environment before printing this email.

Regarding	[redacted] Business for Scotland Ltd
Owner	[redacted]
Keywords	
Duration	**Priority** Normal
Due	
Category	**Sub-Category**

PEF Directorate Categories

PEF Parent Category	**PEF Category**

Attachments

E-Mail Attachments Activity Attachment Associated View

File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	

0 - 0 of 0 (0 selected) Page 1

Status Reason	Received

E-mail

Office Address

Sent Date 09/05/2014 12:29

E-mail

From Business for Scotland Ltd **Cc** [redacted]

To [redacted] **Bcc**

Subject Office Address

Hi Eddie

Just to confirm that it is our intention to change the address that is registered with Companies House to 290 Bath Street at the earliest possible convenience and so please maintain the 290 Bath Street address on the Electoral Commission registration.

many thanks

Gordon

Gordon MacIntyre-Kemp
Chief Executive

[redacted] cid:7FFB29CB-EE5E-432D-AE00-4F5FE6D20283

M[redacted]
Follow us on twitter at @BizforScotland
https://www.facebook.com/BusinessforScotland
www.businessforscotland.co.uk

Vote YES and Scotland's economy will thrive

Regarding Business for Scotland Ltd

Owner [redacted]

[redacted]

Duration **Priority** Normal

Due

Category **Sub-Category**

PEF Directorate Categories

PEF Parent Category **PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
image002.jpg	44,496

1 - 1 of 1 (0 selected) Page 1

Status Reason Received

E-mail

RE: Business for Scotl...

Sent Date 09/05/2014 12:28

E-mail

From [redacted] **Cc**

To Business for Scotland Ltd; Gordon MacIntyre-Kemp **Bcc**

Subject RE: Business for Scotland

Thanks Gordon.

See you on Monday.

Best Wishes

[redacted]

From: Gordon MacIntyre-Kemp [mailto:[redacted]]
Sent: 09 May 2014 12:24
To: [redacted]
Cc: [redacted]
Subject: Re: Business for Scotland

Hi [redacted] yes i believe that has all been confirmed - apologies that didn't get through to you

Gordon

On 9 May 2014, at 11:23, [redacted] wrote:

[redacted]

Are you and Gordon able to do the meeting on Monday?

Thanks

[redacted]

From: [redacted] [mailto [redacted]
Sent: 06 May 2014 10:49
To: [redacted]

Cc: [redacted]
Subject: Re: Business for Scotland

[redacted]

That's fine with me, but I'll wait to see if Gordon is free then before confirming. [redacted] will also attend.

[redacted]

[redacted]

On 6 May 2014 10:46, [redacted]@electoralcommission.org.uk> wrote:
[redacted]

We can do 3pm at our office if that works?

[redacted]

From: [redacted]
Sent: 06 May 2014 10:27
To: [redacted]

Cc: [redacted]
Subject: Re: Business for Scotland

[redacted]

Happy to come to you. I'm busy 12.30 to 2.30 but otherwise pretty clear. I'll need to check timings with Gordon. What time would suit you?

[redacted]

[redacted]

[redacted]

On 6 May 2014 10:24, [redacted]@electoralcommission.org.uk> wrote:

[redacted]

Should be possible. Where do you want to meet at your office or ours?

[redacted]

From: [redacted]
Sent: 06 May 2014 09:54
To: [redacted]
Cc: [redacted]
Subject: Re: Business for Scotland

[redacted]

Is there any chance of meeting with Gordon and me next Monday, 12th May?

regards

[redacted]

[redacted]

On 30 April 2014 17:04, [redacted]@electoralcommission.org.uk> wrote:

[redacted]

I've spoken to Gordon MacIntyre-Kemp as I wrote to him this morning confirming Business for Scotland as a permitted participant in the referendum. As such I was seeking a meeting with him. I suggested that it would be good if I met with both of you at the same time and we can go over the campaign rules in general, the working together provisions and discuss any other issues you may have.

Could you co-ordinate with Gordon and let me have some dates when we could do this.

Many thanks

[redacted]

-----Original Message-----
From: [redacted] [mailto[redacted]
Sent: 30 April 2014 15:49
To: [redacted]
Subject: Business for Scotland

Dear [redacted]

I have a number of questions and scenarios on the detailed application of the working together provisions. Would it be possible to meet with you to discuss?

regards

[redacted]

[redacted]

-
-
-

Gordon

Gordon MacIntyre-Kemp
Chief Executive

cid:image001.jpg@01C F6B82.39859510

[redacted]
Follow us on twitter at @BizforScotland
https://www.facebook.com/BusinessforScotland
www.businessforscotland.co.uk

Vote YES and Scotland's economy will thrive

Regarding	Business for Scotland Ltd
Owner	[redacted]
Keywords	
Duration	**Priority** Normal

Due

Category **Sub-Category**

PEF Directorate Categories

PEF Parent Category **PEF Category**

Attachments

E-Mail Attachments **Activity Attachment Associated View**

File Name	File Size (Bytes)
image001.jpg	44,496

1 - 1 of 1 (0 selected) Page 1

Status Reason Sent

The Electoral Commission

Mr Gordon Macintyre-Kemp
Business for Scotland
[redacted]

29 April 2014

Dear Mr MacIntyre-Kemp

Confirmation of referendum campaigner status
Referendum on independence for Scotland – 18 September 2014

Thank you for your application for **Business for Scotland** to be registered as a referendum campaigner in the referendum on independence for Scotland to be held on 18 September 2014.

I am pleased to tell you that your application has been accepted and Business for Scotland has been added to our register of campaigners.

Please see your details below as they will appear on the register. It is important that you check them immediately and notify us of any errors, so that they can be amended as soon as possible. If we have not heard from you within 10 days of the date of this letter we will assume that the details are correct.

Permitted Participant: Business for Scotland
Responsible Person: Mr Gordon MacIntyre-Kemp
Address: 290 Bath Street
Glasgow
G2 9JR

Guidance for Campaigners

As a campaigner, there are rules, set out in the Scottish Independence Referendum Act 2013 that you must follow on:

The Electoral Commission
Lothian Chambers
59–63 George IV Bridge
Edinburgh EH1 1RN

Tel: 0131 225 0200
Fax: 0131 225 0205
infoscotland@electoralcommission.org.uk
www.electoralcommission.org.uk

- donations
- spending
- reporting to the Electoral Commission.

We have produced a series of guidance documents to help you comply with the campaign rules. These are available from:

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

Requesting electoral registration documents

As a registered campaigner in the referendum you are entitled to request the electoral registration documents set out below:

- The full latest version of the register of local government electors and any notice setting out an alteration to that register
- The postal voters list
- The list of proxies
- The proxy postal voters list

These can be requested by submitting a form to the relevant Electoral Registration Officer (ERO). The form can be requested directly from them or be downloaded from

http://www.electoralcommission.org.uk/__data/assets/word_doc/0003/164469/form-ris-request.docx

http://www.electoralcommission.org.uk/__data/assets/pdf_file/0011/164468/form-ris-request.pdf

Once completed it should be submitted to relevant ERO. The contact details for ERO's can be found here:
http://www.saa.gov.uk/saacontacts.php

The Electoral Commission

Meeting

We are offering all of those individuals and organisations who register with us a meeting to go through the guidance in detail and answer any questions you may have. If you would like to take this opportunity please contact me on 0131 225 0202 or email us at scotreferendum@electoralcommission.org.uk

Yours sincerely

[redacted]
Senior Referendum Officer
[redacted]@electoralcommission.org.uk
[redacted]

Electoral Commission use:

The Electoral Commission

Application to register as a campaigner: Referendum on independence for Scotland 2014

Section 1 – Details of the referendum outcome

Outcome you intend to campaign for	**Yes**

Section 2 – Details of the individual or organisation applying for registration

Name of individual or organisation	Business for Scotland Ltd
Address	290 Bath Street
Town	Glasgow
Postcode	G2 4JR
Telephone number	0141 332 0334
Email address	[redacted]

Section 3 – Status

Individual	Go straight to section 6 – the declaration
Registered political party	Go to section 4 – details of party officers
Other organisations	Tick the appropriate box for your organisation and go to section 5 – the details of your responsible person

	Minor political party	Limited liability partnership
	Building society	Friendly society
	Trade union	Unincorporated association
X	Company	

Company registration number (if applicable) 430989

Section 4 – Notification of the responsible person for your organisation

Title Mr First Name(s) Gordon

Surname MacIntyre-Kemp

Address [redacted]

Town Glasgow Postcode [redacted]

Telephone number [redacted]

Email address [redacted]

Section 5 – Declaration and signatures

I hereby give notification to the Electoral Commission that the individual, or organisation, named here wishes to register as a campaigner and become a permitted participant for the purposes of schedule 4 of the Scottish Independence Referendum Act 2013

I declare that, to the best of my knowledge and belief, the information I have provided on this form is true and that I am the named individual, or I am authorised to sign this application on behalf of the above named organisation.

Signed [redacted]

Name Gordon MacIntyre-Kemp

Position held CEO Date April 23rd 2014

Signed

Name

Position held Date

For Electoral Commission use

Date of receipt	Checked by
Date entered in database	File reference number

---------- Original Message ----------
From: Business for Scotland Ltd
Received: 09/04/2021 14:44
To: [redacted]
Cc: [redacted]
Subject: Re: Campaign activity - URGENT FROM ELECTORAL COMMISSION

You are welcome [redacted]

Just noticed a small typo the sentence >> However, I can also assure you that the combined cost of all of our spending on billboards, that happens to delete to activity within the regulated campaign period, will not amount to more than £10,000 in any case.<<

should read >>However, I can also assure you that the combined cost of all of our spending on billboards, that happens to relate to activity within the regulated campaign period, will not amount to more than £10,000 in any case.<<

Many thanks

Gordon

On 9 Apr 2021, at 14:37, [redacted]@electoralcommission.org.uk> wrote:

Gordon

Many thanks for your prompt response. Please do not hesitate to contact me if you have any questions going forward.

[redacted]
Senior Elections and Campaigners Adviser

The Electoral Commission
electoralcommission.org.uk

From: Gordon MacIntyre-Kemp <[redacted]>
Sent: 09 April 2021 13:59
To: [redacted] <[redacted]@electoralcommission.org.uk>
Subject: Fwd: Campaign activity - URGENT FROM ELECTORAL COMMISSION

Hello [redacted]

Thank you for getting in touch, I am aware of the regulations and confirm that Business for Scotland Ltd, the organisation that runs Believe in Scotland, does not meet the criteria to register as a non-party campaign with the Electoral Commission.

We are an umbrella organisation offering support to local, non-party affiliated, pro-independence groups and we draw our support and membership from across the political spectrum. We have no connection to any political party and are not supporting any candidate or any political party to win in the upcoming Holyrood elections, nor will we host any hustings style events.

Our activities make the case for Scottish independence and also lobby for our policies to be adopted, but never for any specific election outcome and our activities have been continuous

since 2011. Our billboards are therefore, a continuation of our ongoing influencing and lobbying activities. However, I can also assure you that the combined cost of all of our spending on billboards, that happens to delete to activity within the regulated campaign period, will not amount to more than £10,000 in any case.

I was the registered, responsible person for Business for Scotland Ltd's independence campaigning activities during the 2014 referendum, when one of your colleagues informed us they felt we had set the gold standard in reporting during that campaign. If there is to be another independence referendum in the future, we will, under those circumstances, register with the Electoral Commission and once again set out to report our activities in an exemplary manner.

Gordon

Gordon MacIntyre-Kemp
Founder and Chief Executive

<image001.png>

The Campaigning Business Network

Twitter: @BizforScotland
Facebook: www facebook.com/BusinessforScotland
Web: www.businessforscotland.com

---------- Forwarded message ---------
From: [redacted]@electoralcommission.org.uk>
Date: Thu, 8 Apr 2021 at 09:43
Subject: Campaign activity
To: info@believeinscotland.org <info@believeinscotland.org>

Dear Sir / Madam

As part of our monitoring activity for the Scottish Parliament election, we have been made aware of billboards promoted by Believe in Scotland that may constitute regulated campaign activity.

There are rules that non party campaigners (individuals and organisations that campaign at elections but do stand candidates) must follow during the regulated period for the Scottish Parliament election which began on 6 January 2021 and will end on polling day. You can find the rules here on our website. If you intend to spend more than £10,000 in Scotland on regulated activity during the regulated period you will have to register with the Commission.

Separately all campaigners must ensure that they include an imprints on election materials and there are specific new rules in Scotland in relation to online materials including websites and contents on social media platforms. You can find our guidance on imprints for non party campaigners on the above page.

We are bringing this to your attention at this point to ensure you are aware of the rules.

[redacted]

Senior Elections and Campaigners Adviser

The Electoral Commission
electoralcommission.org.uk

From: Partyreg
Received: 26/04/2021 15:32
To: Pamela Nash; Pamela Nash
Cc: SIU Info
Subject: Scotland in Union – Registration confirmation CCM:0553343

Dear Pamela Nash,

Registration of Scotland in Union
I write to inform you that we have processed and approved your notification to register Scotland in Union as a non-party campaigner which was submitted on 20 April 2021 and considered complete on 21 April 2021. Your registration is in effect from 20 April 2021.

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

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

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

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

Your entry on the register is:
http://search.electoralcommission.org.uk/English/Registrations/TP12833
(please allow a day for the entry to appear on the register)

	Post/Home address	**Email**	**Telephone**
Campaigner Headquarters	272 Bath Street Glasgow G2 4JR	info@scotlandinunion.co.uk	[redacted]
Responsible person: [Pamela Nash]	-	[redacted]	[redacted]
Secretary: [Pamela Nash]	-	[redacted]	[redacted]
Names of relevant	• Johanna Baxter • Shelia Elizabeth Cannell		

participators:	• Alastair James Cameron • Carole Louise Ford • Patrick Harkness • David Sands

Guidance

You can find our general guidance for NPCs here and our guidance for the 2021 elections here. Below we have highlighted some specific guidance. If you have any questions about spending or reporting, please contact us at pef@electoralcommission.org.uk.

Enforcement

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

NPC renewal deadline

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

Your renewal deadline is 20 July 2022. You should set a reminder for this deadline if you intend to renew your registration. If your NPC is not renewed, it will be removed from the register. This can be completed either online or by using a TP3 form.

Electoral register

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

Please contact us if you have any further questions.

Yours sincerely,

[redacted]
Registration Adviser

The Electoral Commission
electoralcommission.org.uk

From: Pamela Nash
Received: 20/04/2021 13:37
To: [redacted]
Subject: Scotland in Union Application

Hi [redacted]

Thank you for speaking to me just now. Here is our application for registration as a Non-Party Campaigner.

I can be contacted on [redacted] should there be any questions.

Many thanks,

Pamela

Pamela Nash
Chief Executive

Scotland in Union

[redacted]

www.scotlandinunion.co.uk

t: @scotlandinunion f: https://www.facebook.com/scotlandinunion

Electoral Commission use:

The Electoral Commission

Notification to register as a non-party campaigner

Section 1 – Details of the individual or organisation applying for registration

Name of organisation or individual who is applying to register. This is the name that will appear on the register.

SCOTLAND IN UNION

Commonly-used campaign name

SCOTLAND IN UNION

Address: 272 BATH STREET

Town: GLASGOW

Postcode: G2 4JR

Telephone number: /

THERE IS NO PUBLIC CONTACT NO, ELECTORAL COMMISSION CAN CONTACT [redacted]

Email address: info@scotlandinunion.co.uk

Section 2 – Status		
I am registering as:		
Individuals		
An Individual If you are registering as an individual you must be on the electoral register or resident in the UK Are you on the electoral register? ☐ Are you resident in the UK? ☐ Go to Section 6 – the declaration	☐	
Registered political parties (Not minor parties)		
A Registered political party	☐	Go to Section 8 – the declaration
Companies		
A Company Company Registration Number: SC492324	☒	Go to Section 3 the responsible person and additional information
Other types or organisation		
A Minor political party	☐	Go to Section 3 the responsible person and additional information
A Building society	☐	Go to Section 3 the responsible person and additional information
A Trade union	☐	Go to Section 3 the responsible person and additional information
A Scottish partnership carrying on business in the UK	☐	Go to Section 3 the responsible person and additional information
A UK charitable incorporated organisation	☐	Go to Section 3 the responsible person and additional information
A Limited Liability Partnership	☐	Go to Section 3 the responsible person and additional information
A Friendly Industrial or Provident society	☐	Go to Section 3 the responsible person and additional information
An Unincorporated Association	☐	Go to Section 3 the responsible person and additional information
A body incorporated by Royal Charter	☐	Go to Section 3 the responsible person and additional information

Section 3 – Notification of the responsible person for your organisation (all organisations excluding registered political parties)*

Title	MISS
First Name(s)	PAMELA
Surname	NASIT
Address	[redacted]
Town	[redacted]
Postcode	[redacted]
Telephone number	[redacted]
Email address	[redacted]
Position held in organisation	CHIEF EXECUTIVE

Section 4– Are you carrying on a business in the UK?

If you are required to carry on a business in the UK as part of your registration, please outline your current activities in the box below:

SCOTLAND IN UNION IS A NON-PARTY, NOT-FOR-PROFIT ORGANISATION CAMPAIGNING TO MAKE THE POSITIVE CASE FOR SCOTLAND IN THE UK.

* Some organisations must also provide the names of the individuals that make up their governing bodies or committees. In law these individuals are called 'relevant participators'. If you are a body listed in the table on page three of the explanatory notes to this form, please use the continuation sheet to provide the names of your organisation's relevant participators. The continuation sheet is at the end of this document.

Section 5 – Other documentation in support of your application

Are you submitting any other documentation in support of your application:

Yes ☐

Please list these documents on a separate sheet

Section 6 – Declaration and signatures (individuals)

I hereby give notification to the Electoral Commission that the individual named in section 1 wishes to register as a campaigner for the purposes of Part VI of the Political Parties, Elections and Referendums Act 2000.

By signing this declaration, I confirm that the information contained on this form is true and accurate. I understand that by making a false declaration on this form may result in prosecution.

I also understand that by signing this declaration, I am responsible for all liabilities and duties attributed to me as a non-party campaigner and this may also include liabilities and duties attributed to a responsible person.

I am the person applying to be a non-party campaigner ☐

Signed

Name

Date

Section 7 – Declaration and signatures (Other organisations, excluding registered political parties)

I hereby give notification to the Electoral Commission that the organisation named in section 1 wishes to register as a campaigner for the purposes of Part VI of the Political Parties, Elections and Referendums Act 2000.

By signing this declaration, I confirm that the information contained on this form is true and accurate. I understand that by making a false declaration on this form may result in prosecution.

I also understand that by signing this declaration, I am responsible for all liabilities and duties attributed to me as a non-party campaigner and this may also include liabilities and duties attributed to a responsible person.

I am the secretary, or acting in similar capacity as secretary of the organisation named in section 1 ☒

Signed [redacted]

Name PAMELA NUASH

Position CHIEF EXECUTIVE

Date 19/4/21

If you are not the company secretary, please explain how you are acting in a similar capacity to a company secretary

Section 8 – Declaration and signatures (registered political parties)

I hereby give notification to the Electoral Commission that the political party named in section 1 wishes to register as a campaigner for the purposes of Part VI of the Political Parties, Elections and Referendums Act 2000.

By signing this declaration, I confirm that the information contained on this form is true and accurate. I understand that by making a false declaration on this form may result in prosecution.

I also understand that by signing this declaration, I am responsible for all liabilities and duties attributed to me as a non-party campaigner and this may also include liabilities and duties attributed to a responsible person.

I/We are the responsible officers of the above-named political party ☐

Signed (Registered Leader)

Name

Position Held

Date

Signed (Nominating Officer/Additional Officer- if Nominating Officer and Leader are the same person)

Name

Position Held

Date

Section 8 (continued) – Additional party officer (if applicable)

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

the party's registered: (position in party)

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

Signed: Date: (dd-mm-yyyy)

Printed name:

Position:

Section 9 – Declaration and signatures (Responsible person)

By signing this declaration, I confirm that the information contained on this form is true and accurate. I understand that by making a false declaration on this form may result in prosecution.

I also understand that by signing this declaration, I am responsible for all liabilities and duties attributed to me as a responsible person and this may also include liabilities and duties attributed to a non-party campaigner.

Signed [redacted]

Name PAMELA NASH

Position Held CHIEF EXECUTIVE

Date 19/4/21

Form TP1: Continuation sheet

Organisation name: SCOTLAND IN UNION

The relevant participators for the above named organisation are listed below.

Name	Position
ALASTAIR CAMERON	DIRECTOR OF THE COMPANY
SHEILA CANNELL	"
PATRICK HARKNESS	"
DAVID SANDS	"
CAROLE FORD	"
SOHANNA BAXTER	"

Privacy Statement

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

The lawful basis to collect the information in this form is that it is necessary for us to perform tasks carried out in the public interest and to exercise official authority vested in the Electoral Commission as set out in the Political Parties, Elections and Referendums Act 2000, the Representation of the People Act 1983, associated regulations and other electoral legislation.
Some of the information collected in this form is classified as special category personal data. We process this for reason of substantial public interest, which has a basis in UK law. To process this type of information the Data Controller must have a relevant policy document that sets out how this information will be handled.

The Electoral Commission is the Data Controller and its Data Protection Officer is [redacted] (dataprotection@electoralcommission.org.uk).

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

For Electoral Commission use only			
Date of receipt		Checked by	
Date entered in database		File reference number	

From: Pamela Nash
Received: 10/03/2021 16:03
To: [redacted]
Subject: Re: SP Elections May 2021

Hi Martin

3pm on Tuesday is good for me. Zoom invite below. See you then!

Pamela Nash is inviting you to a scheduled Zoom meeting.

Topic: SIU and EC Meeting
Time: Mar 16, 2021 03:00 PM London

Join Zoom Meeting
[redacted]

[redacted]

Best wishes,

Pamela

Pamela Nash
Chief Executive

Scotland in Union

[redacted]

www.scotlandinunion.co.uk

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On Wed, 10 Mar 2021 at 14:53, [redacted]@electoralcommission.org.uk> wrote:

Pamela

I have a meeting at 2pm but it is a daily thing and subject to cancellation. So possibly can make that. Otherwise I am free from 3pm onwards if that suits. Just send me a Zoom invite.

[redacted]

From: Pamela Nash <p[redacted]
Sent: 10 March 2021 14:50
To: [redacted]@electoralcommission.org.uk>
Subject: Re: SP Elections May 2021

Hi [redacted]

Thank you for getting back to me so quickly. Monday is busy for me so Tuesday afternoon will be ideal. Shall we say 2pm?

I would like to clarify a couple of points about donations and get some more information about expenditure and what to include (for example are there guidelines on salary inclusion). Nothing more complicated than that!

Best wishes,

Pamela

Pamela Nash

Chief Executive

Scotland in Union

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On Wed, 10 Mar 2021 at 10:15, [redacted]@electoralcommission.org.uk> wrote:

Pamela

More than happy to meet with you but unavailable this week I am afraid. My calendar is full. How about afternoon on either Monday or Tuesday next week?

If you can give me a note of what you want to cover off, I can decide whether I need a colleague to attend.

Thanks.

[redacted]

From: Pamela Nash <[redacted]>
Sent: 09 March 2021 16:24
To: [redacted]@electoralcommission.org.uk>
Subject: SP Elections May 2021

Hi [redacted]

I hope you are well! I am sure this is an extremely busy time for you at the moment!

I would be grateful if you have time to have a short zoom meeting as soon as possible to discuss the advice for Non-Party Campaigners. My time is pretty flexible at the moment, so if you could suggest some times when you are free that would be great.

Best wishes,

Pamela

Pamela Nash

Chief Executive

Scotland in Union

[redacted]

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