

[REDACTED]

**From:** FOI  
**Sent:** 31 May 2022 15:16  
**To:** [REDACTED]  
**Subject:** FOI 041-22 - Response

Dear [REDACTED],

**Our Ref: FOI-041-22**

Thank you for your email to the Electoral Commission dated 2 May 2022 and received by the Commission on 3 May 2022.

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.

*I wish to make a request under the Freedom of Information Act 2000. My request concerns the categories of campaign spending which political parties must report as part of their annual accounts. In particular, I would like to know:*

- 1) Whether political parties are required to identify the type of advertising they have purchased when reporting their annual accounts. For instance, are they required to identify entries relating to online/digital advertising?*
- 2) If political parties report their digital advertising spend, do they also need to identify what type of digital advertising, for instance search engine marketing, social media ads, display ads, native advertising, video advertising, web push, mobile advertising or other?*
- 3) If political parties do report the detail of their online/digital advertising spend as in 2) above, for the General Election in 2019, what was the breakdown in terms of how much was spent across all parties for, e.g.:*
  - a. instance search engine marketing,*
  - b. social media ads,*
  - c. display ads,*
  - d. native advertising,*
  - e. video advertising,*
  - f. web push, or*
  - g. mobile advertising?*
- 4) Finally, what happens when, in submitting its annual accounts to the Electoral Commission, a political party submits a receipt where the services/goods purchased are unclear? Does the Electoral Commission request further details from the political party?*

**Our response is as follows:**

We hold the information you have requested, and have included responses to each question below.

## **Question 1 – advertising and annual accounts**

Political parties must report the total amount of costs spent on campaigning in that financial year in their annual accounts, however they are not required to specify the category of campaigning in their accounts.

Parties must however report spending on activities to promote themselves during an election that falls under the Political Parties, Elections and Referendums Act 2000 (PPERA) (such as UK Parliamentary general elections, Scottish Parliament and Senedd elections), including spending on advertising of any kind. These costs are reported in their spending returns after the election, details of which are published on our [public registers](#).

An overview of the rules can be found [in the Commission's guidance](#) that we published for political parties ahead of the 2019 UK Parliamentary General Election to set out the laws they are required to follow.

## **Question 2 – digital advertising**

For each item of spending, parties are required to identify the full name and address of the supplier, amount of expenditure, and the date the expenditure was incurred and paid. Invoices must be included for any item of spending over £200. Using our online reporting system or our forms, parties report the spending under the appropriate category of expenditure under PERA (such as advertising of any kind; unsolicited material; press conferences; rallies and events).

No further detail on the category of expenditure is required.

However, there are limits on how much candidates, political parties and non-party campaigners can spend during election campaigns. These limits were set out in law by the UK Parliament. They apply to a range of campaigning activities, including online political advertising. There isn't a separate spending limit for online political ads – but, if campaigners choose to spend more on online political ads, then they have less to spend on printed campaign materials or any other activity during the regulated period.

## **Question 3 – breakdown of spend by political parties**

It is not possible to ascertain the spending by parties on different types of advertising as this is not required to be reported. Only the details of spending by parties on 'advertising of any kind' is publically available from the 2019 UK Parliamentary General Election spending data.

The data is available on the [public registers](#) and data has also been made available in [chart format](#). You can download and filter the data by spending category in the excel file.

## **Question 4 – annual accounts of political parties**

There is no requirement for invoices or receipts to be delivered with a party's annual accounts. However, for those parties whose income or expenditure is over £250,000, there is a requirement for the political party to have its annual accounts independently audited by a qualified external auditor.

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

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

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**The Electoral Commission**

[electoralcommission.org.uk](http://electoralcommission.org.uk)