[redacted]

From: FOI
Sent: 11 September 2023 14:56
To: [redacted]
Subject: FOI 121-23 - Response
Attachments: 2023-07-10-Carlton Club Political Committee-MA1 and UA1_Redacted.pdf; 2023-02-01-Carlton Club Political Committee-RD1A_Redacted.pdf; 2023-04-11-Carlton Club Political Committee-MA1_Redacted.pdf

Dear [redacted]

Our Ref: FOI-121-23

Thank you for your email to the Electoral Commission dated 11 August 2023.

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 copies of any written correspondence (sent or received) that the Electoral Commission has had, between the dates 01 January 2023 and 10 August 2023, with:

A) The Carlton Club
B) The Carlton Club Political Committee

This should include any notifications about donations or other registration requirements.

Our response is as follows:

We hold the information you have requested and we have attached it to this email.

The material we are disclosing all consists of submissions by the Carlton Club to the Commission. There has been no correspondence sent by the Commission to the Carlton Club within the timeframe specified in your request.

Section 40(2):

You will notice that certain personal details have been redacted from the documents we are releasing. Section 40(2) of the Freedom of Information Act 2000 provides for an exemption where the information requested constitutes personal data as defined by the Data Protection Act 2018 (DPA), and where release of the information requested would breach one of the data protection principles. Some of the information contained in the requested information falls within the description of personal data as defined by the DPA because the information relates directly to an identifiable living individual.

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
FOI@electoralcommission.org.uk

The Electoral Commission
electoralcommission.org.uk

Electoral Commission use:

RECEIVED
10 JUL 2023

The Electoral Commission

Form MA1

Quarterly nil report of gifts received by a members' association after a political contribution was made

Section 1 Details

Name of association	Carlton Club Political Committee
Address	69,St James's Street
Town	London
Postcode	SW1A 1PJ
Telephone number	[redacted]
Email address	[redacted]
Reference number	

Quarter: 1 ☐ 2 ☑ 3 ☐ 4 ☐

Year: 2023

Section 2 Statement of nil return or compliance

No gifts have been received that we are required to report to the Electoral Commission under Part IX of the Political Parties, Elections and Referendums Act 2000 ☑

We have already reported all of the gifts we have received to the Electoral Commission as part of our reporting responsibilities under Parts IV and IVA of the Political Parties, Elections and Referendums Act 2000 ☐

Section 3 Declaration and signatures

I am the person authorised to make this declaration under Part IX of the Political Parties, Elections and Referendums Act 2000. I hereby declare, to the best of my knowledge and belief, that the above statement of nil return is accurate and that during the above reporting period no gifts have been received by the above named association.

Signed [redacted]

Printed name [redacted]

Position held [redacted]

Date 6th July 2023

For Electoral Commission use

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

Electoral Commission use:

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10 JUL 2023

The Electoral Commission

Form UA1

Notification of an unincorporated association making a political contribution

Section 1 Details of unincorporated association submitting the notification

Name of association	CARLTON CLUB POLITICAL COMMITTEE
Address	69, ST. JAMES'S STREET
Town	LONDON
Postcode	SW1A 1PJ
Telephone number	[redacted]
Email address	[redacted]

Section 2 Your status

We are also a members association Yes ☑ No ☐

Section 3 Responsible person authorised by unincorporated association

Title [redacted] First Name(s) [redacted]

Surname [redacted]

Address [redacted]

Town [redacted] Postcode [redacted]

Section 4 Declaration and signatures

I hereby give notification to The Electoral Commission that the body named here has made political contributions for the purposes of Part IX of the Political Parties, Elections and Referendums Act 2000

Signed [redacted]

Printed name [redacted]

Position held [redacted] Date 6th July 2023

For Electoral Commission use

Date of receipt

Checked by

Date entered in database

File reference number

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01 FEB 2023

The Electoral Commission

Reporting a donation or visit

The completion notes contain guidance on filling in the numbered boxes.

Section A Your details (to be completed by all) [1]

Name [redacted]

Telephone number [redacted]

Email address [redacted]

Address [1]
CARLTON CLUB
POLITICAL COMMITTEE
69, ST. JAMES'S STREET
LONDON
Postcode SW1A 1PJ

I am (please tick)
an MS ☐ an MSP ☐ a councillor ☐
other UNINCORPORATED ASSOCIATION

Section B Donation details (if reporting a visit, go straight to Section C)

Name of donor: STRANDBROOK LIMITED

Address of donor [2]
8, SACKVILLE STREET
LONDON
Postcode W1S 3DG

Donor status [3] (please tick)

individual	☐	registered party	☐
building society	☐	trade union	☐
friendly society	☐	unincorporated association	☐
limited liability partnership	☐	company (please give the company registration number below)	☑

Company registration number: 06278422

public funds (for members associations only) ☐

Provision under which public funds made

Section B Donation details (continued)

If the donor has an anonymous entry in an electoral register, I confirm that I have seen the prescribed evidence to verify this [4] (please tick) ☐

Date donation received [5]

2 4 0 1 2 0 2 3

Date donation accepted

2 4 0 1 2 0 2 3

This should be no later than 30 calendar days after the date of receipt.

Donation type (please tick and complete the amount for cash donations, and the nature and value for non-cash donations)

Cash donation ☑ ➤ Amount £ 50,000—

Non-cash donation ☐ ➤ Nature of donation

Value of donation £

Please tick all of the following that apply

The donation is being reported as an aggregation [6] ☐

The donation is a bequest ☐

The donation is sponsorship [7] ☐

Section C Visit details (if reporting a donation, go straight to Section D)

Start date of visit

End date of visit

Place(s) visited

Purpose of the visit

Name of person/organisation funding the visit

Address of person/organisation funding the visit

Value of the visit £

I have not been able to ascertain the value of the visit, but I believe it to be more than £1,500 [8] ☐
(only tick if there is no clear commercial equivalent)

Postcode

Section D Declaration (to be completed by all)

I confirm, to the best of my knowledge and belief, that the donation was from a permissible donor (please tick) ☑

I declare, to the best of my knowledge, that the information provided on this form is accurate.
Important: a person commits an offence if they knowingly or recklessly make a false declaration.

Signed [redacted]

Date 30 01 2023

Print name [redacted]

Individuals must sign this personally. No one else can do this on your behalf.

In the case of a members association, the association's treasurer or the person responsible for managing the donations to the association must sign.

Please return this form to:

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

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

Electoral Commission use only

Date received D D M M Y Y Y Y On time? Yes ☐ No ☐

Referred to enforcement team? Yes ☐ No ☐ ➤ Date D D M M Y Y Y Y

Date received back from enforcement team D D M M Y Y Y Y

Date logged D D M M Y Y Y Y

Electoral Commission use:

RECEIVED
11 APR 2023

The Electoral Commission

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Telephone number	[redacted]
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Reference number	

Quarter: 1 ☑ 2 ☐ 3 ☐ 4 ☐

Year: 2023

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Section 3 Declaration and signatures

I am the person authorised to make this declaration under Part IX of the Political Parties, Elections and Referendums Act 2000. I hereby declare, to the best of my knowledge and belief, that the above statement of nil return is accurate and that during the above reporting period no gifts have been received by the above named association.

Signed	[redacted]		
Printed name	[redacted]		
Position held	[redacted]	Date	5th April 2023

For Electoral Commission use

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