[redacted]

**From:** FOI
**Sent:** 12 December 2023 11:39
**To:** [redacted]
**Subject:** FOI 156-23 - Response

Dear [redacted],

**Our Ref: FOI-156-23**

Thank you for your email to the Electoral Commission dated 17 October 2023.

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

Your request is shown below followed by our response.

*Please may you provide me with:*

*All information and correspondence you hold on Patriotic Alternative or that mentions Patriotic Alternative.*

*I suggest that you remove from my request any documents that are public, any documents that you have already provided to myself or Patriotic Alternative in any form and any correspondence between our organisations or myself.*

*In short: the purpose of this enquiry is to see internal communications about Patriotic Alternative or me as well as third party external communications that involve Patriotic Alternative.*

*The time frame we require is from January 1st of this year* [2023] *for six months.*

**Our response is as follows:**

We hold information relevant to your request and we are disclosing some of that information.

To access the documents we are releasing you will need to use our secure document-sharing system Objective Connect. You will receive an 'Invitation to Objective Connect Email Notification' (sent to the inbox of [redacted]). This notification will contain a link to enable you to start accessing the documents. Please find below details on how to access the specific area we have set up for your documents.

1. Click on the link in the email.
2. You will be prompted to set up your username and password. Your username will be your email address, and your password can be whatever you like.
3. With your username and password, enter both details at the login screen and click 'login'.
4. You will now see your personal page, which will show the Share 'FOI 156-23'.
5. By clicking on the name of the share, you will find your documents.

6. You may view any of these documents
7. In addition you may download a copy to your personal computer by selecting the 'download' option and then 'save'.

This service will be closed one month from our response date, this is the **12 January 2024**.

Some of the information we hold is exempt from disclosure and we have explained the reasons for that below:

**Exemption: Section 40(2) - personal information**
You will notice that certain personal details have been redacted from the documents we are releasing. Section 40(2) of the Freedom of Information (FOI) 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. This includes names and contact details of individuals in some instances. The individuals in some cases are junior staff members and they would not reasonably expect their information to be released.

**Exemption: Section 31(1)(a) - the prevention or detection of crime**
Section 31(1)(a) of the FOI Act exempts from disclosure information that would or would be likely to prejudice the detection and prevention of crime. Section 31(1)(a) can apply to information on general policies and methods adopted by law enforcement agencies. We have redacted some information because we consider that it relates to general policies and methods adopted by law enforcement agencies. Disclosure of information that would directly identify the law enforcement agencies would, in our view, be likely to prejudice the exercise of the functions of those agencies, which involves the prevention and detection of crime.

**Public interest test**
Application of the section 31 exemption is subject to the public interest test. There are a number of factors that must be weighed in the balance to consider whether the public interest in applying the exemption outweighs the public interest in disclosure.

The factors we have considered are set out below.

**The arguments considered in favour of disclosure**
The Commission recognises that with regard to the disclosure of information generally, there should be a presumption in favour of disclosure. However, it doesn't necessarily follow that it is in the public interest to disclose information regarding the prevention and detection of crime.

We also recognise that there is a general public interest in promoting transparency, accountability, public understanding and involvement in the democratic process. Stemming from that, there is a legitimate public interest in promoting public understanding of the decisions we make as a regulator.

**The arguments considered against disclosure**
The public interest also lies in enabling law enforcement agencies to conduct their regulatory functions effectively and efficiently. There is a public interest in ensuring the integrity and effectiveness of law enforcement agencies to prevent and detect crime. The release of information that would disclose policies and methods adopted by law enforcement agencies would inhibit the

ability of an agency to conduct their functions effectively, and impact on the prevention and detection of crime. Allowing disclosure of information of public policies and methods adopted by law enforcement agencies would allow use of that knowledge to circumvent the prevention and detection of crime.

**Conclusion**
We consider that the balance of public interest in this case lies on the one hand in carrying out our regulatory functions in an open and transparent way, and in promoting public understanding of the decisions we make as a regulator; and on the other in the ability of law enforcement agencies to conduct regulatory work effectively and efficiently.

Having carefully weighed the public interest relating to possible disclosure of the information requested under section 31(1)(a) we are satisfied that it is not appropriate at this time to disclose the relevant information which the Commission holds. The Commission is satisfied that maintaining the exemption outweighs the public interest in disclosure.

**Exemption: section 42(1) – legal professional privilege**
We have redacted and withheld some of the information relating to this request under section 42(1) of the FOI Act. Section 42 provides an exemption for information that is protected by Legal Professional Privilege (LPP). This exemption protects communications between lawyers and their clients for the purpose of obtaining legal advice, or documents created by or for lawyers for the purpose of litigation.

**Public interest test**
We have considered the public interest test, for and against release of the information you request.

**The arguments considered in favour of disclosure**
There is a general presumption in favour of disclosure and there is a general public interest in authorities being accountable for the quality of their decision-making. Ensuring that decisions have been made on the basis of good quality legal advice is part of that accountability. There is a legitimate public interest in our registration process and it being transparent. Transparency in the decision-making process and access to the information upon which decisions have been made can enhance this accountability, as well as public understanding and involvement in the democratic process. It could also be seen that there is a public interest in some cases in knowing whether or not legal advice has been followed.

**The arguments considered against disclosure**
Section 42 reflects a strong public interest in the Electoral Commission being able to communicate freely and frankly with its legal advisers to provide and receive advice in confidence. Public authorities require high quality and comprehensive legal advice for the effective conduct of their business. The ability of the Electoral Commission to obtain confidential legal advice so it can take robust and legally sound registration decisions is in the public interest.

There is a very strong element of not disclosing in the public interest inbuilt into the concept of Legal Professional Privilege and this has long been recognised, by the Information Commissioner, the Information Tribunal and the courts, and it reflects the importance of legal advice being sought, and given, in confidence. Moreover, the legally privileged material relates to a relatively recent decision of the Commission. Disclosure of the material is not necessary in order to understand the Commission's registration decision in this instance.

**Conclusion**

After carefully considering the opposing public interest arguments in favour of engaging the exemption and in favour of releasing the information, there is, we believe, a strong and overriding public interest in maintaining the principle of legal professional privilege.

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

The Electoral Commission

**Meeting with Patriotic Alternative: minutes**

**Date:** 10 January 2023

**Time:** 09:30 – 10:30

**Attendees:** Mark Collett, National Chair and proposed Leader (**MC**)

[redacted], Head of Admin and proposed Nominating Officer ([redacted])

[redacted] proposed Treasurer ([redacted])

Louise Edwards (**LE**)

[redacted] ([redacted])

**Reference documents:** [redacted]; September 2022 registration assessment note

1. **LE** gave background on registration process and framework
2. [redacted] suggested that decision making has been inconsistent between applications, citing emblems and financial schemes that have remained consistent but have had different minded to decisions.
    a. **LE** – decisions are taken on a case by case basis, considering all relevant factors at the time.

    Where an application to register is refused on the basis of not being considered complete, minded to decisions are offered on identity marks. These are not views guaranteed on future applications.
3. [redacted] referred to minded-to decisions on emblems including acronyms, where 'PA' has been minded to be refused while 'DUP' and 'SNP' are in registered identity marks.
    a. **LE** – acronym use is only permitted is acronym is considered commonly known by voters. If it is not well known and not spelled out in full, we consider that this is likely to mislead an elector.

b. [redacted] – proposed emblem includes ‘PA’ as acronym of Patriotic Alternative, which [redacted] suggested is often used in media reports in place of the name and should be considered well known.

c. **LE** – we won’t guarantee any future decisions; registration of an emblem is subject to the legal requirements. It is open to the party to resubmit an emblem and provide representations on the usage. LE also noted that an emblem is an optional identity mark to register, and that a party can be registered even if the emblem contained in the application is refused.

4. **MC** – Commission has taken decisions based on speculation of how Equality Act will be applied by party.[1]

    a. **LE** – EqA overlaps PPERA, concerned with how membership provisions impact potential members with protected characteristics. Commission must take decisions in line with carrying out its Public Sector Equality Duty. It is for a party to determine how to structure itself, but it must be compliant with EqA requirements.

    b. Party confirmed they were now structured with members after previously submitting an application which did not contain membership provisions.

5. [redacted] – party has made amendments to application on basis of September decision correspondence. Party has also been in contact with Britain First to discuss their 2021 application to register.

    a. [redacted] – party now has card carrying membership and is structured as an unincorporated association.

    b. Candidate selection provisions have been revised.

    c. Provisions on officer changes and appointment of officers have been amended in line with PPERA requirements.

    d. **LE** – considerations and decisions are taken on a

6. [redacted] – party intends to submit a fresh application to register ahead of the 20 January advisory deadline, in order to have a decision taken ahead of the close of nominations for May polls.

    a. [redacted] – party would like a named point of contact ahead of submission, to provide feedback and initial views on revised application.

---

[1] Likely a reference to this decision correspondence.

NB we do not agree with MC’s interpretation of the correspondence.

b. **LE** – party registration team does not have capacity to offer this service, and registration advisers cannot guarantee future decisions on initial views or feedback. Applications are assessed first come first served.

   Party can request updates on progress of application, but registration team will not comment on likelihood of an application being approved or not. Decisions are taken on a case by case basis, taking into account all relevant information.

c. [redacted] – We cannot guarantee that we will make a decision in time on applications submitted after 5pm on 20 January 2023. For elections taking place on 4 May 2023, new parties must be registered on Friday 31 March, ahead of the close of nominations at 4pm on Tuesday 4 April.

7. [redacted] – applicant parties are now subject to requirements on assets and liabilities

   a. [redacted] – parties with A/L £500 or less must make a declaration as such, and parties with A/L over £500 must submit a record. This was not a requirement when the party last applied to register.

   b. [redacted] – party aware of this new requirement but could not find template record on website.

   c. [redacted] – guidance and link to template would be sent to party following meeting.[2]

[2] This was sent on 12 January 2023.

# PATRIOTIC ALTERNATIVE

## APPLICATION TO REGISTER IN GB

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## Decision and Approval Board comments

**Applicant party name:** Patriotic Alternative

**Application type:** Application to register in GB

**Relevant register:** GB (England, Scotland, Wales)

| **Application details and recommendation** | **Decision and Approval Board comments** |
|---|---|
| Constitution (**R**)<br><br>Financial scheme (**R**)<br><br>Proposed party name:<br>Patriotic Alternative (**A**) | **Initial view (please add initials and date):**<br><br>LE – 09/03/23 – As recommended I am minded to refuse the constitution and financial scheme.<br><br>Constitution – incomplete information<br><br>PPERA requires the party to have a constitution, which is defined as "the document or documents (of whatever name) by which the structure and organisation of the party is determined" (PPERA 26(9)).<br><br>By Schedule 4 paragraph 5(1), an application must be accompanied by a copy of the party's constitution.<br><br>The party's constitution says:<br><br>1.1.1 The Party exists as a Limited Liability Company registered with Companies House, Registration Number: 12759841 in accordance with the Companies Act 2006 and its Certificate of Incorporation.<br>1.1.2 The Limited Company has a Board of three directors [redacted].<br><br>Patriotic Alternative Ltd (12759841) is registered with Companies House as a private company limited by guarantee. Its current registered directors are Steven Blake, Mark Collett and Laura Tyrie.<br><br>Companies House guidance describes the articles of association of a limited liability company as follows:<br><br>*A company's articles of association are its internal rulebook, chosen by its members. Every company is required to have articles, which are legally binding on the company and all of its members. The articles help to ensure the company's business runs as smoothly* |

| Application details and recommendation | Decision and Approval Board comments |
|---|---|
| | *and efficiently as possible and will set out how decisions are taken by the members and directors as well as various matters connected with the shares.*<br><br>Where a party is also a limited liability company, therefore, the articles of association is one of the documents by which the structure and organisation of the party is determined. In failing to provide this document with its application, I am minded to conclude that the party has failed to meet the requirement of Schedule 4 paragraph 5(1) and the application should therefore be refused.<br><br><u>Initial views on other areas identified of potential constitutional non-compliance</u><br><br>There are then further considerations about whether the partial documents provided – ie what the party calls its 'constitution' – are compliant with PPERA. I have reviewed the points put forward in the assessment on this. My initial view is as follows:<br><br>• With regard to the 'deputy leader', as the assessment notes the duties of this post-holder are not set out in the constitution. There is, in paragraph 9, a reference to other 'party officers' being appointed, which could conceivably include a deputy leader. The difficulty with this particular role, though, is that as a director of the company they have responsibilities in relation to party funds. Without the articles of association, we cannot see what these duties are or how they are carried out, or whether they should be reflected in the constitution as well.<br><br>I am not however convinced that we should assume the deputy leader would naturally become the leader in the event of a vacancy, contrary to the constitution. We should take the constitutional provisions at face value on officer replacements, subject to the fact that we can't see whether anything in the articles of association says anything different.<br><br>• The lack of an AGM quorum in itself I would not consider sufficient to refuse a constitution. |

| Application details and recommendation | Decision and Approval Board comments |
|---|---|
| | However, as per the assessment, it is an area where the constitution is not clear. It is also another area where we can't see if the articles of association address it.<br><br>• I agree with the assessment that the provisions for the appointment/election of the National Leader are inconsistent. In terms of the eligibility criteria for the National Chairman, I am minded to agree with the assessment that the requirement for continuous membership of two years puts the party in an impossible position. This is because between February 2022 and January 2023 the party did not, on its own account, have any members. Combined with the issue of how the National Chairman is appointed/elected, and exactly when the two years' of Mr Collet's leadership begins versus the constitutional cycle of elections to the National Chairman position, I am minded to conclude that the constitution lacks sufficient clarity around the appointment/election of the National Chairman for us to be satisfied that it is compliant with PPERA.<br><br>• I am more sympathetic to the provisions around the appointment of a new National Chairman should the incumbent die or become incapacitated. The reference to 14 days is clearly an attempt to be clear that the party understands the requirement to notify us. It could give itself more time to make the notification by pulling that forward, but it isn't in itself inconsistent with PPERA. I read the reference to someone assuming the role on a day to day basis as a backstop provision to keep the party running in an unforeseen situation.<br><br>• The position of officers being appointed as directors is unclear, but it is similarly unclear whether this is a constitutional issue or one that simply requires some good administrative provisions sitting under the constitution. Perhaps if we had the full constitution including |

| Application details and recommendation | Decision and Approval Board comments |
|---|---|
| | the articles of association, we would be able to tell.<br><br>• I am minded to agree that there is reason to consider the lack of any reference to how party regional branches operate means the constitution does not set out the structure and organisation of the party accurately.<br><br>• I don't read the constitution as allowing the National Chairman to delegate their responsibilities. Paragraph 11.2 relates to someone acting as chair of a meeting rather than as chair of the party.<br><br>• I don't see a contradiction in the responsibilities of the National Chairman and the National Council. I read them as expecting collaboration, and for decisions to be taken as per the standing orders in paragraph 11.<br><br>• In term of dissolution, the party has limited itself to that only being possible at an AGM, as the only type of general meeting set out in the constitution (noting that other types of general meeting might well be set out in the articles of association). This seems restricting, but is not in consistent with PPERA.<br><br>As noted in the assessment, there are other areas where adding in further detail might assist the party. Of course, this might already be in the articles of association.<br><br><u>Financial scheme</u><br><br>I am minded to refuse the financial scheme. A number of the provisions highlighted above as problematic relate to there being a registered leader in place, and to control over party funds. Of particular concern is that the party's funds may be held in accounts registered to the company, so without the articles of association we are missing key information to determine whether the financial scheme has been adopted. |

| Application details and recommendation | Decision and Approval Board comments |
|---|---|
| | ALR<br><br>As per the assessment I am minded to conclude this meets the legal requirements.<br><br>Name<br><br>As per the assessment I am minded to conclude this meets the tests for registration.<br><br>Taking previous applications into account<br><br>As the assessment notes, a number of these issues have been raised with the party previously. We must consider each application afresh, but we can start with checking whether guidance issued previously has been considered. We aim to offer a comprehensive response to applications highlighting all areas of issue, but it may be proportionate for us in certain cases to focus on key known issues and if as a result it is clear that the application is not compliant then the assessment can stop there. We must still, however, make a new decision based on the application before us.<br><br>**Approval Board comments (please add initials and date):**<br><br>CW 14/03/2023 – I agree with the initial view and am grateful for the thoroughness of the supporting consideration and recommendations. It is clear that the articles of association are a key (though not sole) barrier. I support the suggested approach to any future assessments, as articulated in the initial view; but on the understanding that we offer additional engagement / advice – in responding to this application – to support the applicants to understand the current and repeat barriers experienced.<br><br>AON 15/3/23 – I have read the Registration Team report and the minded view of the decision taker. I have considered the matter and agree with the initial view. I support the proposal that we seek to advise the applicant in the future. |

| Application details and recommendation | Decision and Approval Board comments |
|---|---|
| | DA 16/3/23: I also agree with the initial view in its entirety, including the views expressed on each aspect. I have considered the assessment and reviewed the constitution and financial scheme. It is a concern that matters previously pointed out to the party remain unresolved, and whilst I do think further support is sensible, we should also be mindful of the potential resource commitment involved balanced against the party's apparent failure to recognise the same issues previously despite advice. If the party is unable to organise its administration for the purposes of its application, it does not bode well for its compliance should it become registered.<br><br>RT 16/03/23: Having read the assessment and the initial view, I am content to support that minded view. I think also helpful to communicate to the party what kind of support we can provide but also mindful of the limitations in place, as outlined by DA.<br><br>TH 16.03.2023: The assessment provides a comprehensive review of the application, and the initial view helpfully summarises the key considerations. I agree with the recommendations and the initial view. It is clear that we have already provided substantial advice and assistance to the applicants over a significant period of time. Obtaining the articles of association would be a sensible starting point for considering whether the most significant outstanding concerns can be addressed, before moving to full consideration of any further application. I think it is worth noting that, as far as I can see, many of the issues identified in this assessment (and previous assessments) are similar to issues that we have regularly identified with other applications.<br><br>CH 20/03/23: I have read the assessment and the initial view and am supportive of the recommendation made by both. I note comments from other in relation to communicating with the applicants, which although may be limited given previous communications, would nevertheless be helpful. |

| Application details and recommendation | Decision and Approval Board comments |
|---|---|
| | **Decision (please add initials and date):**<br>LE – 20/03/23 – I am not satisfied that the applicant has delivered the complete documents comprising its constitution under PPERA, or that what has been delivered is compliant with PPERA. I am also not satisfied that the financial scheme is compliant with PPERA, in part because of the absence of parts of the constitutional documents. For these reasons I refuse the application.<br>For completeness, should the application have been complete and a decision been required on the name, then based on the current context I would have approved the name. |

## Recommendation of Registration Team member

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

| | | | |
|---|---|---|---|
| **Application** | - | **A** | Meets the PPERA requirements |
| **Asset and liability declaration** | - | **A** | Meets the PPERA requirements |
| **Constitution** | - | **R** | - Is not consistent with the scheme<br>- is not consistent with PPERA<br>- does not properly set out the structure of the party |
| **Financial scheme** | - | **R** | Has not been adopted |
| **Name** | Patriotic Alternative | **A** | Meets the PPERA requirements |
| **Broader recommendation**<br>4. As part of this assessment, I have collated and summarised the reasons for rejection in the previous 6 applications. As noted below, there are | | | |

some matters in this application that have been reasons for rejection in other applications. This is not the first instance where a matter previously raised as reason for rejection, has not been addressed in a subsequent application.

5. Given the number of applications we have received from the party, the large amounts of guidance we have given them as to the requirements, and that this issue has occurred multiple times, it is my view that we take this into account in any future application.
6. I recommend that if a matter raised in either this decision (if the decision is to reject the application) or a past decision, is not addressed in a subsequent submission the application is rejected out of hand, without detailed consideration. I recommend that we advise the party of this in any decision for this application if the decision is made to reject this application.

[redacted]

08 March 2023

# Registration Team member assessment

## Applicant party information

| | |
|---|---|
| **Link to party's registered entry** | n/a |
| **Link to party accounts** | Website, Wikipedia |

7. It appears that the party no longer uses mainstream social media and most accounts appear to have been deleted.
8. Mark Collett, [redacted] used the Bitchute [1]
9. The following [redacted]
   a. Mark Collett – [redacted]
   b. [redacted] – Nominating officer
   c. Treasurer – [redacted]
10. [redacted] – Mark Collett was formerly chairman of the Young BNP, the youth division of the British National Party (BNP). He was later expelled from the party.
11. There are a number of new articles relating to Mark Collett and his time as a member of the BNP party.[2] [3] [4] [5] [6] [7]
12. In 2007 an investigation by the Guardian into the British National Party revealed that the fund raising group 'Civil Liberty' which was allegedly separate from the party, transferred money donated via its website to the party. [8] [9]
13 [redacted]
14 [redacted]

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[1] https://www.google.co.uk/url?esrc=s&q=&rct=j&sa=U&url=https://www.bitchute.com/channel/markcollett/&ved=2ahUKEwja9rL16cX2AhUMa8AKHbQ4DKkQFnoECAoQAg&usg=AOvVaw1fDNsN7UsqJi0tqFhO9bX7

[2] Accessed on 18 March 2022

[3] Accessed on 18 March 2022

[4] Accessed on 18 March 2022

[5] Accessed on 18 March 2022

[6] Accessed on 18 March 2022

[7] Accessed on 18 March 2022

[8] https://www.theguardian.com/politics/2007/apr/12/thefarright.politics

[9] https://www.theguardian.com/uk/2007/feb/03/partyfunding.thefarright

15 [redacted]

16. The Mirror and the Independent have published online articles about Patriotic Alternative.
17. During August 2020, the group unfurled "White Lives Matter" banners across the United Kingdom. [11] [12] [13]
18. The party's website states that in September 2020, the group beamed a "Migrants not Welcome" slogan off the cliffs of Dover.
19. Additional open sources information is included annex 1.

## Application history

| **Link to application docs** | Application, Financial Scheme, Constitution | |
|---|---|---|
| **Part of the register** | GB (England, Scotland, Wales) | |
| **Date first lodged** | **Date considered complete** | **Date published for comment** |
| 20 January 2023 | 27 February 2023 | 27 January 2023 |

20. Application received via PEF Online on 20 January. This is a resubmission but
21. Party contacted on 10 February for clarification on ALR provided, deadline of 24 February for response.
22. 22 February, party provided response.
23. 27 February, in light of correspondence party amended ALR.

| **Applications** | Date received | Date rejected |
|---|---|---|
| **1st Application** | 18th October 2019 | 03 February 2020 |
| **2nd Application** | 29th February 2020 | 28th April 2020 |
| **3rd Application** | 02 October 2020 | 11 January 2021 |
| **4th Application** | 10 February 2021 | 14 July 2021 |

[10] [redacted] h2eH2AhUOQkEAHTilBAcQFnoECAEQAg&usg=AOvVaw38F3hVmvRibVzJQV9Lbkd4

[11] https://www.independent.co.uk/news/uk/home-news/far-right-black-lives-matter-protests-racism-patriotic-alternative-hope-not-hate-a9672401.html

[12] https://www.sussexlive.co.uk/news/sussex-news/white-lives-matter-campaign-banners-4412960

[13] https://www.buxtonadvertiser.co.uk/news/people/right-wing-group-unfurl-huge-white-lives-matter-banner-mam-tor-2909936

| | | |
|---|---|---|
| **5th Application** | 11 February 2022 | 01 April 2022 |
| **6th application** | 05 May 2022 | 30 September 2022 |

24. We wrote to the party on 12th May 2022 to confirm receipt of the application.
25. All correspondence with the party throughout this application process can be viewed in the RP1 case.

## Consideration of the Welsh Language Measure

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

| **Type** | **ID Mark – English Version** | **ID Mark – Welsh Version** | **Translators comments** |
|---|---|---|---|
| Patriotic Alternative | Party Name | Dewis Amgen Gwladgarol | Dewis Amgen Gwladgarol<br><br>[The translation literally means ‘Patriotic Alternative Choice’. This is because there is no noun in Welsh which means ‘[an] alternative’; rather, we have an adjective – ‘amgen’ – which means ‘alternative’. When a noun is needed in this connection – i.e. an alternative ‘something’ - the usual order of things is to use ‘dewis amgen’ (alternative choice). |

## Intention to stand candidates

29. Paragraph 2.4 explains that the party will stand candidates at every level in Great Britain. This includes standing candidates in local, county and parliamentary elections in England, Scotland and Wales.

## Application form

| | |
|---|---|
| **Link to application form** | Application |
| **Recommendation** | **Approve** |
| **Summary reason** | Meets the PPERA requirements |

30. I **am** satisfied that the required fee has been provided.
31. I **am** satisfied that the party have provided the address of the headquarters, or that where they have provided a correspondence address, that there is no evidence that the party has a headquarters.
32. I **am** satisfied that the party have applied to register the overall leader of the party, or where the party does not have an overall leader, the leader is registered for a particular purpose.
33. I **am not** aware of any convictions for electoral fraud within the last 5 years for the proposed treasurer, having conducted open source searches.
34. I **am** satisfied that the officer roles applied for are compliant with PPERA.
35. I **am** satisfied the party has provided home addresses for all responsible officers.
36. I **am** satisfied that the application has been properly authorised.
37. I **am** satisfied the party has applied for a financial year end that matches that applied for in their financial scheme.

## Constitution

| | |
|---|---|
| **Link to constitution** | Constitution |
| **Recommendation** | **Reject** |
| **Equality Act issue identified** | - |
| **Summary reason** | Does not set out the structure in practice, is not consistent with the scheme, is not consistent with PPERA |

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

39. In my view the constitution **does not** show the structure and organisation of the party.

**Summary and recommendation.**

40. There are a number of issues with the constitution. Some of these issues are fundamentally related to how the party structures itself and have been entirely omitted.

41. Because of the number of issues, I have not made considerations against the topics, as is usually the case. I have instead captured all of the reasons for rejection that I could determine.

42. I have not made considerations against the Equality Act due to the large number of PPERA matters considered here. I note previous assessments not finding any issues in relation to these provisions, however this does not take into account any new context. Any future assessment must consider any new or relevant context in relation to this.

**Matters rejected in previous assessments**

43. Two matters have been previously raised with the party and were cause for rejection:

    d. 1.1.1 states that the party exists as a company. The constitution reflects the structure of an unincorporated association that is separate from the company articles. The constitution does not set out relationship between the two entities.

        i. Does not make clear the structure is practice and we were not able to determine adoption.

        ii. This was reason for rejection in our decisions on 30 September and 1 April 2022. (applications 5 & 6)

e. 6.7 references a regional structure and the website details a number of party branches, but the constitution does not include any details about branch structure.

i. Does not make clear the structure is practice.

ii. This was reason for rejection in our decision on 1 April 2022 (application 5)

**Other reasons for rejection**

44. *Deputy leader* – role and responsibility omitted.

f. Does not allow us to determine adoption of the scheme and does not does not make clear the structure in practice.

45. *Annual general meeting* – No quorum or decision-making details

g. Does not make clear the structure in practice

46. *National Chairman selection* – not clear if appointed by NC or elected by AGM.

h. Does not make clear the structure in practice

47. *National Chairman, replacement in event of death etc.* – not able to replace the leader within 14 days in some circumstances. Appears to co-opt to the leader's role without registration.

i. Not consistent with the scheme

j. Requires clarification on co-opting an officer

48. *National Chairman eligibility criteria* – 2 year continuous membership requirement not possible.

k. Does not make clear the structure in practice and not consistent with the scheme

49. *National Chairman, term period* – constitution creates a situation where no leader is in post

l. Does not make clear the structure in practice

50. *Officers as directors* – some officers must be directors but does not detail at what point an individual becomes a director and, for the treasurer, does not detail how any gap in responsibility will be avoided.

m. Does not make clear the structure in practice

51. *Delegation of National Chairman responsibilities* – leaders role can be delegated, does not specify any exemption for PPERA responsibilities.

n. Not consistent with PPERA.

52. *National Council meetings* – no quorum requirements or decision-making details.

o. Does not make clear the structure in practice

53. *General meeting* – mentioned but no details included

| | |
|---|---|
| | p. Does not make clear the structure in practice<br><br>**Clarification required**<br>54. *National Chairman term, number of years* – constitution appears to give conflicting term periods.<br>q. Request party clarify this in any future submission |

**Reasons for rejection**

**Company provisions**

55. 1.1.1 states that the party exists as a company.
56. In our previous assessment we concluded that the company forms part of the party, but that the constitution did not outline the structures linking the two organisations, particularly in relation to how they interact and the nature of the company in relation to the party. We were not satisfied that simple mention of the company was sufficient.
57. This matter remains unresolved.
58. This is fundamental structure that must exist but has been omitted. Its omission does not allow us to determine if the structures of the party are consistent with the scheme.
59. I recommend rejection because the **constitution does not allow us to determine adoption of the scheme** and because the **constitution does not set out the structure and organisation of the party in practice**.

**Deputy Leader**

60. 1.1.2 states that the party [redacted] director of the company.
61. According to Patriotic Alternatives website, "*Patriotic Alternative is run by two people; Mark Collett, who is the leader of Patriotic Alternative, and Laura Towler, who is the Deputy Leader*"
62. That officer's role is not set out anywhere in the constitution.
63. The party sets out provisions at 5.4 and 5.9.c to deal with the termination of appointment of the leader by various means. Neither of these provisions mention the deputy leader acting in an interim position, instead a National Council member is co-opted (the deputy leader is not a member of the NC).
64. I am not satisfied the constitution is compliant with the act on two counts in relation to this matter:
    a. It fails to set out the role and responsibility of the deputy leader and we therefore cannot determine adoption of the scheme where this information is missing.
    b. The natural reading of the role of the deputy leader would be to take on the role of the leader, were their position terminated. Where the role of the deputy leader is omitted, I am not satisfied that the provisions set out in 5.4 and 5.9.c reflect how the party operates in practice. It seems very likely to me that were any of the scenarios covered by 5.4 and 5.9.c to occur, the deputy leader would in fact become interim leader. Currently, this appears not to be possible at all.

65. I recommend rejection because the **constitution does not allow us to determine adoption of the scheme** and because the **constitution does not set out the structure and organisation of the party in practice**.

**Annual General Meeting**

66. There are no quorum requirements for the AGM.
67. All members can vote but the constitution does not set out what level of support is required for an agenda item to be approved – it must have a specific level in practice.
68. It is not clear if, for example, all items are by a simple majority or if some items have a higher threshold.
69. Whilst these matters are minor, they apply to its highest-level meeting, and the party *must* have these structures to operate.
70. I recommend rejection because the **constitution does not set out the structure and organisation of the party in practice.**

**National chairman selection**

71. 5.4 of the constitution states that the chair is appointed by the National Council.
72. 5.6 states that the chair is elected by the members.
73. 5.8 goes onto to detail an election process for the chair.
74. These provisions demonstrate that the constitution is inconsistent with itself.
75. I recommend rejection because the **constitution does not set out the structure and organisation of the party in practice.**

**National Chairman, replacement in event of death etc.**

76. 5.4 states the following:

> *"If the National Chairman dies in office or through illness or other circumstances becomes unable to continue in office, the National Council will be convened as soon as is practically possible, but no later than 14 days of the date of the National Chairman being declared incapacitated, to appoint a successor. Until that official appointment one of the other officers, in consultation with the entire National Council will assume the role on a day to day basis in accordance with PPERA."*

77. The requirement under 31(4) is that a notification must be given to the Commission within 14 days of the death or termination of appointment of an officer. Convening "not later than 14 days" to appoint a successor leaves the party with little or no time to make a notification to us, as required, if the party meets on the 14th day.
78. The latter provision appears to be redundant and not consistent with PPERA. The NC will co-opt a member to be chair until a successor is appointed. However, they appear to require a meeting to do that. Given that the NC will convene "*as soon as is practically possible*", it would be the case that a successor is appointed before this provision is even required.
79. Additionally, this appears to empower an officer with the role of leader, without registering them with us. Otherwise, the party is in a situation of needing to register 2 officers. If the party is

passing the leaders responsibility, even temporarily to someone else, they must be registered with us. This does not appear to be the case.

80. I recommend rejection because the **constitution is not consistent with the financial scheme in relation to officer change time frame.**

81. I recommend that the party clarify the co-option process in light of the requirement that any officer taking on this role must be registered. This will likely require amendment in line with role of the deputy leader.

**National Chairman eligibility criteria**

82. 5.7 requires that a candidate for chair must have 2 years continuous membership. This section goes on to state that this is not required for first 2 years of the party's existence and Mark Collett will be chair.

83. This latter provision only relates to the appoint of Mark Collett in this period and does not account for potential of him resigning as chair, or his appointment terminating in some other way, during the 2 years from February 2023.

84. In the party's previous two applications, it has not had any membership requirements. Whilst the party had membership requirements prior, between 11 February 2022 and 20 January 2023, the party did not have official membership. It is therefore not possible for any individual to have 2 years of *continuous* membership and the event of the termination of appointment of Mark Collett inside the first 2 years, no other member is eligible to be the chair.

85. As such, the party *must* have some other process or structure around this matter, otherwise the party would be unable to fill the role of leader until a member has reached the required 2 years of membership. This is inconsistent with the scheme and PPERA which require an officer to be replaced within 14 days of the termination of appointment.

86. I recommend rejection because the **constitution does not set out the structure** and **organisation of the party in practice and because the constitution is not consistent with the scheme.**

**National Chairman, term period**

87. The constitution is dated 17 January 2023 and we can assume this is the date that the provisions of this constitution have effect from.

88. 5.7 states that Mark Collett will serve as Chair for the first 24 months of the party's existence. We can take that to have effect from 17 January 2023, to 17 January 2025.

89. 5.9.a "*The position of National Chairman shall be valid for TWO years*".

90. 5.8 states that the election process for the Chair states on 1 July and concludes on 1 August. If it is uncontested it concludes on 1 July.

91. There is therefore a period between 18 January and 1 July 2025 at the earliest, where the term limit for Mark Collett expires and the next term begins. In this period the party would have no overall leader.

92. This is not compatible with PPERA. The constitution state who is the leader throughout this period.

93. 5.9.c has similar issues. This paragraph sets out the process for replacing the chair in event of their resignation. Within the 14 days an interim chair is selected by the NC and an election must be carried out within 90 days.

94. 5.9.c does not state any further details about the length of this term, so we must conclude that 5.9.a applies.

95. It is very unlikely that the resignation of the chair would line up with the election timetable set out in 5.8 and again the party would have an effective period without a leader in post once their term ends after 2 years.

96. Either, the chair remains in post during this period or an interim is appointed. In any event, this is not set out in the constitution, as is required.

97. I recommend rejection because the **constitution does not set out the structure and organisation of the party in practice.**

**Officers as directors**

98. [redacted]

99. It appears to me that an individual cannot be eligible to be one of these officer roles unless they are made a director prior to appointment.

100. This is particularly relevant to the treasurer. If the company holds any property or assets on behalf of the party (we do not know, as the constitution does not explain this), it is not clear how the treasurer will discharge their PPERA duties and obligations over any property or assets.

101. The constitution must set out at what point in the process they are made directors, and how long this will take. In the case of the treasurer, they will need to make clear how the party intends to deal with any gap in directorship. How the party deals with this is for the party to determine.

102. I recommend rejection because the **constitution does not set out the structure and organisation of the party in practice.**

**Branch structure**

103. 6.7 – *"The treasurer is a signatory on all regional accounts and has oversight over all regional accounts where applicable."*

104. This paragraph makes clear that that the party has branch structures in some form.

105. The party website similarly describes a branch structure. Below I have included some examples[14] [15] [16]:

c. "*At present, Mark, Laura and our Regional Organisers are the only official representatives of Patriotic Alternative, although Patriotic Alternative enjoys support and promotion from the wider nationalist community in Britain*."

*d. "we have smaller, regional groups scattered across the country who hold local events."*

[14] https://www.patrioticalternative.org.uk/about

[15] https://www.patrioticalternative.org.uk/regional_contacts_page

[16] Archived pages, accessed 07/03/2023 – About; Regional Contacts

e. *"We currently have regional groups in every region in Britain and we're currently in the process of setting up a group in Northern Ireland."*

f. *"Regional fitness clubs"*

*g. "We hold regular fitness events across the country. Contact your Regional Organiser to get involved!"*

106. The party appears to have a regional branch structure, as well as other groups which amount to constituent organisations.

107. Such internal organisations must be included and defined so that we can determine whether they amount to accounting units or not, and whether the scheme provided is appropriate and adopted.

108. In our decision of 6 April 2022, in relation to the party's 5th application, we state the following:

*h. Based on information contained on the party's website, it appears that the party is structured with branches. This is no, however, reflected in the constitution and therefore the constitution does not properly determine the party's structure. We also cannot satisfy ourselves that the constitution is consistent with the party's financial scheme where this information is not included.*

109. We have previously determined that this omission requires the application to be rejected.

110. I recommend rejection because the **constitution does not allow us to determine adoption of the scheme** and because the **constitution does not set out the structure and organisation of the party in practice**.

**Delegation of National Chairman responsibilities**

111. 11.2 – the party can select someone to act in their place in their absence.

112. 9.4 – non-PPERA officers can have their roles rescinded by acting chairs.

113. It does not appear there is any separation for an acting chair from the leaders PPERA responsibilities. Such separation is required, otherwise the leader's role can be delegated, and the party no longer has an overall leader. The application states the party has an overall leader.

114. So that the party is able to comply with PPERA 24(2), it must amend the above provisions.

115. I recommend rejection because the **constitution is not consistent with PPERA.**

National Council meetings

116. 5.3 – Chair, in conjunction with the NC, responsible for day-to-day management.

117. 8.8 – responsibilities of the NC

118. It is clear from the constitution that the NC has decision making powers. It is also clear that the Chair individually has some responsibility for these decisions. The constitution does not set out *how* decisions are made. For example, are decisions made by a simple majority? Does the NC only advise the Chair and they make the decisions? Do some decisions require a consensus or more than majority support?

119. These meetings do not contain any quorum requirements.

120. Where decision making processes and quorum requirements must exist and are not included, the structure of the party is not properly set out.

121. I recommend rejection because the **constitution does not set out the structure and organisation of the party in practice**

**General Meeting**

122. 14.1, in relation to dissolution of the party, makes clear that members must approve dissolution at a "general meeting".
123. The party has no EGM process.
124. This either refers to the AGM or another type of meeting. As the AGM can only be held once a year, it may be the case that the party would have to wait most of a year to authorise dissolution. It seems unlikely that that would be case.
125. As the party appears to have another meeting type that is not set out, I am not satisfied that structure is properly set out.
126. I recommend rejection because the **constitution does not set out the structure and organisation of the party in practice**

**Clarification required**

**National Chairman term, number of years**

127. 5.4 states that the chair serves a two-year term.

128. 5.8 states that "*Each year when the Office of National Chairman is up for renewal*". This appears to read that the chair position is elected *every* year.

129. 5.9.a states that the position of chair is a two-year term.

130. I recommend that we suggest the party clarify this matter in any amended application.

**Considerations made, no rejection or clarification required**

**Treasurer and nominating officer appointment**

131. 6.1 – the treasurer is appointed by the chair.

132. 8.14 states that changes to any PPERA officers must be compliant with PPERA.

133. Usually, the process of selecting a new officer must be set out wholly and with time frames, so that we can determine consistency with the scheme. In this instance, as the process is simply one individual selecting another, without the requirement for a meeting to be held or other officers consulted or party to the decision, I am satisfied that this will meet the PPERA requirements in terms of timing – the party *have* set out the whole process. Where a process involves more steps, a meeting, or more than one officer, it is reasonable for it to set out time frames.

134. On the basis of 8.14, which states the change will be PPERA compliant, it is reasonable to assume that this simple process can be concluded within 14 days, as no other arrangements are required.

135. This similarly applies to the nominating officer (7.1).

**Candidate selection**

136. Our guidance says that a constitution should include "*the candidate selection process (or at least a statement that the party will have one).*"

137. In the previous constitution, 2.4 stated that "*Candidates for election will be chosen by a selection process overseen by the National Council.*" This is now 2.5 in the current constitution.

138. 6.8.c--f of the previous constitution, and 8.9.c-f of the current say that the NC will drawn up and maintain, as and when required, rules for candidate selection at a number of elections.

139. The previous assessment concluded that it was "*not clear how individuals can become candidates*" and that this resulted in the structure and organisation of the party not being properly set out.

140. I do not agree with this conclusion. Our guidance states that a party merely state that it has a candidate selection process, which I am satisfied it has done, on the basis of 2.5 and 8.9.c-f.

141. Where these provisions remain in place and unchanged, I recommend that we do not consider them reason for rejection.

## Financial scheme

| | |
|---|---|
| **Link to scheme** | Financial Scheme |
| **Recommendation** | **Reject** |
| **Summary reason** | Is not consistent with the constitution and therefore has not been adopted |

142. Pursuant to section 26 of PPERA, a party may not be registered unless it has adopted a scheme which sets out the arrangement for regulating the financial affairs of the party for the purposes of PPERA.

143. I am of the view that the scheme **does** set out the arrangements for regulating the financial affairs of the party of the purposes of PPERA.

r. The scheme uses our template and includes the name of the party and treasurer throughout.

s. I note that the constitution excludes a number of structures, particularly in relation to branches. Any future assessment will need to consider whether branch structures are in line with these arrangements.

144. Based on the information available to me, I am of the view that the party **has not adopted** the scheme.

t. For the reasons set out in the assessment of the constitution, the scheme is not consistent with the constitution. Where that is the case, I am not satisfied that the scheme is adopted.

u. For the reason set out in paragraph I cannot be satisfied that the financial scheme has been adopted.

v. One way to donate to the party is by cash payment sent to the party's PO Box.[17]

w. Parties can only accept donations from permissible sources as defined in PPERA. The party must verify that donations above a specified threshold are from permissible sources.

x. I have concerns on how the party will check the permissibility of donations (and loans). Particularly as it is open for individuals to anonymously send donations.

y. Under section 54(1) of PPERA, registered political must not accept a donation from an impermissible donor. Parties have 30 days to check that a donor is permissible and then either accept the donation or return it if it is an impermissible donor. Section 54(2) of PPERA defines permissible donors to registered political parties.

z. Although this arrangement is not by definition inconsistent with PPERA requirements, I am of the view that further clarification and assurances should be sought from the party in relation to their abilities to comply

[17] https://www.patrioticalternative.org.uk/donation

with their legal responsibilities, before any application to register the party is approved.

145. The party's financial year end **does** match the financial year end indicated on the application form.

## Asset and Liability Declaration

| | |
|---|---|
| **Link to record**<br>**Recommendation**<br>**Summary reason** | ALR, supporting information<br>**Approve** |
| Pursuant to section 28(3B) of PPERA, a party may not be registered unless it has made a declaration that it the asset/liability is or is not met. Has the party has made a declaration under 28(3B)? | |
| Declaration has been made and states that an ALR is required. I have made further considerations below. | 1. Having considered the available information, I am satisfied that an ALR is required. |
| 28(3D) requires that a record of assets and liabilities be provided if the declaration states the condition is met. Where the party has provided an ALR, I have considered whether in my view the record properly reflects the assets and liabilities of the party, at the point of submission. | |
| 2. I am satisfied that the asset and liability record is properly made. | 3. Having conducted searches of the available information, I have found information that suggests the record is improperly made.<br>a. I highlighted to the party of a number of matters in relation to information on their website which indicated that the party may have further assets or liabilities that had not been recorded.<br>4. The party has provided additional information/ amendments to its record. I have made considerations of this below.<br>a. After highlighting this information to the party and some additional clarification of terms, the party provided an amended ALR, alongside an explanation of other matters raised in correspondence.<br>b. Addendum to ALR<br>c. correspondence<br>d. I am satisfied, on the basis of the information provided, that the party have addressed all matters raised.<br>5. I recommend that the record be approved |

## Name

| | |
|---|---|
| **Proposed name** | Patriotic Alternative |
| **Recommendation** | **Approve** |
| **Summary reason** | Satisfies requirements of a party name |

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

147. As explained above, in considering the requirements of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards, I have sought a translation for this proposed name: **Dewis Amgen Gwladgarol**

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

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

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

150. I am of the view that registration of the identifier **is not likely** to result in electors confusing the applicant party with another registered party.

bb. I conducted similarity tests between the proposed name and other registered identity marks on the GB register or ones that are protected after de-registration. I have set out these examples in ballot paper form

| | |
|---|---|
| **OAK, Mary**<br>(address in the Constituency)<br>Freedom Alliance. The Real Alternative | |
| **ASH, James**<br>(address in the Constituency)<br>Patriotic Alternative | |
| **PINE, Susan**<br>(address in the Constituency)<br>Freedom Alliance. Real People. Real Alternative | |

cc. The word ‘Patriotic’ does not appear on the register.

dd. There are no registered identity marks that contain the word ‘Patriotic’. There are several identifiers that contain the word Alternative alongside another word. However, in my view none of these identity marks would likely be confused with the party name. This is because the proposed name contains the word Patriotic which does not currently appear on the register. I think this makes the identity mark sufficiently distinct with respect to other registered identity marks which contain the word Alternative.

151. The proposed identifier **is not more** than six words.

152. The proposed identifier, in my view, **is not** obscene or offensive.

153. The proposed identifier, in my view, if published is **not likely** amount to the commission of an offence.

154. The proposed identifier, in my view, is **not likely**, were it to appear on a ballot paper, to result in an elector being misled as to the effect of their vote.

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

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

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

## Register searches

### Table 1: Similarity score results

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

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

k. The search did not yield any results

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

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

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

n. The word Patriotic does not appear on the relevant register

| **Word searched for: Alternative** | | | |
|---|---|---|---|
| **ID Mark** | **Second name / translation** | **Type** | **Party registered to** |
| Freedom Alliance. The Real Alternative | - | Description | Freedom Alliance- Integrity, Society, Economy |
| Freedom Alliance. Real People. Real Alternative | - | Description | Freedom Alliance- Integrity, Society, Economy |

## Public comments

None received for this submission.

Previous public comments received in relation to past applications:

| Commenter | Comment |
|---|---|
| **For application received 10 February 2021** | |
| **26 March 2021 -** [redacted] | Third, Patriotic Alternative, on the grounds it is potentially offensive. The proposed emblem consists of PA where the A is stylised as a Greek capital letter Lambda. The Lambda is frequently used as an identifying symbol for white supremacists and white nationalists (see the American Defamation League hate symbol database: https://www.adl.org/education/references/hate-symbols/identitarian-lambda) and given Patriotic Alternative's publicly available output (e.g. references to the racist "white replacement" conspiracy theory on their website) I strongly believe this is the intended use of the symbol. |
| **For application received 02 October 2020** | |
| **23 December 2020 -** [redacted] | Dear Sir or Madem<br><br>I am objecting to the registration of the above party, on its discrimative nature<br><br>It is against the Jews<br>It is against coloured people and advocates repatriation of coloured people to the country of their forefathers if they were born in the uk of coloured parents<br><br>regards |

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## Annex 1 - Open source material into the parties activities

158. There are a number of reports by Hope not Hate into the party's activities can be found on the groups website.[18] [19] [20]

159. [redacted] This has been taken from the party's website (links included below). The materials do not appear to be produced by the party. Evidence of materials being posted on the party's website that may be considered to promote white supremacist values.

Music videos are hosted on the PA website here but not produced by the group (the PA website says they "beneficial for those studying Music or Musical Production and parents may wish to discuss with their children.")

The music videos produced by Erberderber YouTube account and hosted on PA website;

London Has Died

https://odysee.com/@EasternPatrioticAlternative:3/banner_drop_parliament:1[21]

- Describes ideas of race replacement and describes 'multiculturalism' as 'genocide' and 'ethnocide' (see timestamp 2:40) which almost certainly promotes white supremacist conspiracy theories.

Rabbit Hole - https://odysee.com/@erberderber:a/rabbit-hole:5

In the video 'Rabbit Hole' several conspiratorial anti-Semitic memes and images are shown presenting Jewish people and Israel as part of a harmful elite as well as a graph claiming black people have inferior IQs to white people (I've attached screenshots). The video presents a message that rapid demographic change imminently threatens the white race.

More broadly;

- PDF of 'Be Proud of YOUR People' document, which is pitched as reading material, is attached. This is not overtly extremist, rather alluding to white nationalist and supremacist themes by idolising the white race. There is a sense of deniability in the tone. E.g. lists inventions by white people and includes sub textual references e.g. image of 'okay' hand gesture almost certainly reference to supremacist internet culture where the symbol is used to denote the saying 'it's OK to be white'.

[18] https://hopenothate.org.uk/wp-content/uploads/2020/08/HnH_Patriotic-Alternative-report_2020-08-v3.pdf

[19] https://hopenothate.org.uk/wp-content/uploads/2021/11/patriotic-alternative-report-2021-11-v3.pdf

[20] https://hopenothate.org.uk/2022/04/26/patriotic-alternative-what-you-need-to-know-about-the-nazis-exploiting-the-media/

[21] Must be accessed outside of the virtual PC

- All content can be found in 'education' tab of PA website https://www.patrioticalternative.org.uk/ where it also outlines education objectives in the tab 'our plan'. An example of these objectives - "Children who do not speak English (or Welsh in Wales or Gaelic in Scotland) will not be eligible for state education and state funded schools will not pay for interpreters."

160. [redacted]

ee. Times article

ff. Britain's Growing Far-Right Party Is a Serious Threat | Novara Media

161. The below table includes media reporting relating to the party.

| Date | Media reports |
|---|---|
| 3 March 2023 | The Ferret – 1 March [redacted] who has previously hosted a party podcast with [redacted] and other Scotland branch organisers, pled guilty to disseminating terrorist publications. He is reported to have shared manifestos of far right terrorists on social media. [redacted] is allegedly a former member of banned group National Action. He faces a sentence up 15 years.<br><br>The Press Association, via North Norfolk News, reported on the case on 1 March.<br><br>BBC also reports on this matter on 1 March. |
| 24 February 2023 | Hull Daily Mail - reports a party organiser [redacted] was charged with stirring up racial hatred. [redacted] The report notes [redacted] was charged with one offence under Public Order Act, section 19 and one offence under Serious Crime Act, section 44. |
| 13 February 2023 | Daily Mail – in the wake of Merseyside riot, report on PA. Describes leader as Neo-Nazi. |
| 13 February 2023 | The Times – PA involved in leafleting local area before Merseyside riot. |
| 10 February 2023 | The Guardian – report on demonstrations in Knowsley, allegedly organised by the party (the party denies this), which resulted in arrests for violent disorder.<br>Further reporting on suggests far-right supporters set a police van on fire. |
| 31 January 2023 | The Ferret – PA Scotland, accused by critics of stirring racial hatred in Erskine. |
| 19 November 2022 | Daily Post - reports the party leafleting in opposition to asylum seekers in the area. |
| 16 November 2022 | The Ferret - reports that [redacted] was found guilty and admonished for what appears to be minor firearms offences. |

| | |
|---|---|
| 03 July 2022 | The Guardian – report of a submariner linked to PA. "*navy sources said it was "highly likely" that* [redacted] *would now be removed from the service and that Police Scotland had been contacted over the matter."* |
| 22 May 2022 | The Ferret – [redacted] is reported as calling "National Socialist" to join the party. Members of the Telegram group shared weapon making guides, as well as photographs posing with weapons. |
| 09 May 2022 | The Independent - reported the party delivering mock leaflets of the Labour and Conservative Party, as filmed in a Dispatches by channel 4. |
| 18 April 2022 | Daily Record – party accused of delivering leaflets attempting to stir up racial hatred. |
| | |

**From:** [redacted]
**To:** [redacted]
**Subject:** Application dates to complete
**Date:** 10 March 2023 14:38:21

Hi all,

As I mentioned at the team meeting this morning, [redacted] has flagged that some applications are missing some dates of when they were progressed.

Below is a table from the last 6 months or so, with the missing info highlighted (you might have to zoom out on your email). As I said, some of these are live applications where the info is missing because the app hasn't progressed to the relevant stage. Also [redacted] generated this info last week so possible that some of this missing info has been filled in during that time anyway. Hopefully this shouldn't be a particularly arduous task.

| Title | Lead | Application type | Application status | Date received | Date complete | Date sent to AB | Date Finalised | Application Summary | Complex? (for KPI) | KPI Date |
|---|---|---|---|---|---|---|---|---|---|---|
| [redacted] | | | | | | | | | | |
| Patriotic Alternative | [redacted] | RP1 | 2 - Pending assessment | 20/01/2023 | 20/01/2023 | | | | Yes | 10/03/2023 |
| [redacted] | | | | | | | | | | |

Please can you go through **by the end of Thursday** and add dates directly into the items on sharepoint? If the applications is no longer live you might need to find it from the all items view, and click to 'edit item' from the drop down option next to the party/campaigner name.

Also can this please be a gentle reminder to make sure that relevant dates are being added and updated as applications progress.

Thank you!

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

# Extracts of information being disclosed for FOI 156-23

| Description of information | Extract of information |
|---|---|
| 09 January 2023 – Extract from internal email summarising organisational updates | Louise and [redacted] will be meeting with representatives from Patriotic Alternative tomorrow |
| 04 April 2023 – Extract from internal note on completion of work tasks | [redacted] has recently assessed an application from Patriotic Alternative |
| 25 January 2023 – Extract from internal email sent scheduling publication for applications being considered by the registration team | I flagged to Niki that we would be publishing a large number of applications, including Patriotic Alternative, and she asked that we don't leave this until Friday afternoon in case there are external enquiries about the applications. Friday morning is fine though! |
| 31 March 2023 – Extract from internal email summarising directorate activities | With processing the decision on Patriotic Alternative on Thursday, we have now met our guarantee to take decisions on all applications received ahead of our 20 January deadline. |
| 06 January 2023 – Extract from internal email summarising directorate updates | [redacted] and Louise are meeting remotely with Patriotic Alternative on Tuesday, to discuss the most recent decision taken to refuse their application to register. |
| 10 May 2023 – Extract from internal email summarising directorate updates | The team has now received an application from Homeland offshoot of Patriotic Alternative |
| 03 April 2023 - – Extract from internal email summarising directorate updates | With processing the decision on Patriotic Alternative on Thursday, we have now met our guarantee to take decisions on all applications received ahead of our 20 January deadline. |

**From:** [redacted]
**To:** Binnie Goh; [redacted]
**Subject:** FW: Patriotic alternative - decision draft CCM:0288359
**Date:** 30 March 2023 15:31:48
**Attachments:** Patriotic Alternative - Decision CCM0288361.msg

---

Hi both,
Please see attached decision sent to PA, for reference. If we receive any response which concerns legal we'll let you know straight away.
Cheers,

[redacted]

**The Electoral Commission**

[redacted]

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**From:** [redacted]>
**Sent:** 30 March 2023 3:01 PM
**To:** Louise Edwards [redacted]
**Subject:** RE: Patriotic alternative - decision draft CCM:0288359

It is now sent. [redacted] is working on publication of the decision for this afternoon

[redacted]

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**From:** [redacted]
**Sent:** 30 March 2023 1:44 PM
**To:** Louise Edwards <[redacted]>; [redacted]
**Cc:** [redacted]
**Subject:** RE: Patriotic alternative - decision draft CCM:0288359

Hi All,
[redacted] and I have both proofread this and accepted all the changes and it's now ready to go.
[redacted] has confirmed with me that there are comms lines ready and we are just waiting for the website to be updated then I will send this.
Cheers,

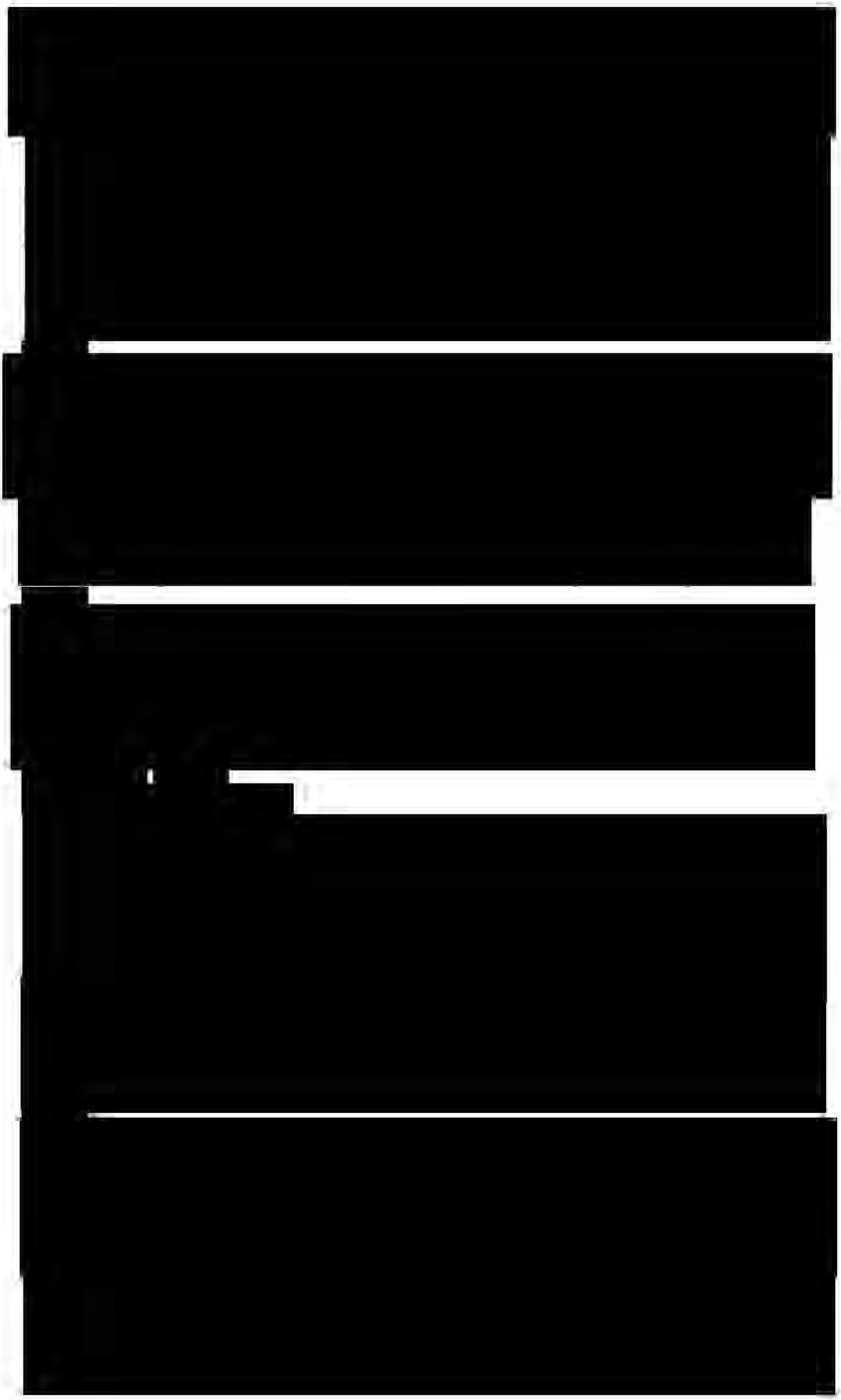
[redacted]

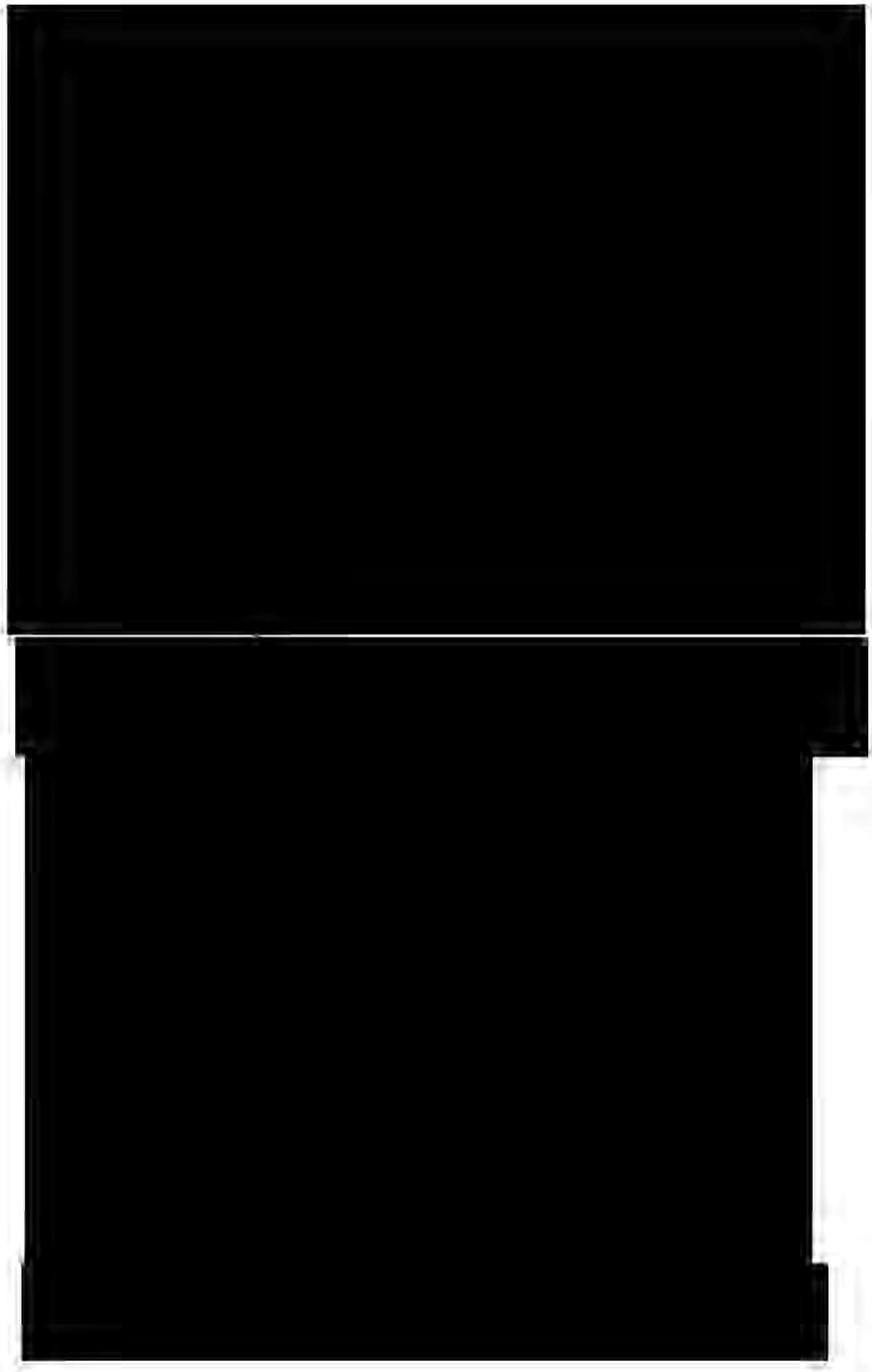
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electoralcommission.org.uk

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[redacted]







[redacted]

**From:** Partyreg <Partyreg@electoralcommission.org.uk>
**Sent:** 20 March 2023 12:23 PM
**To:** Louise Edwards [redacted]>
**Subject:** RE: PR23-12 comments due by Friday 17th March CCM:0497161

Hi Louise,

The application below is ready for a final decision. Can you let us know when you've provided this?

Thanks,

[redacted]

**The Electoral Commission**

[redacted]

electoralcommission.org.uk

**From:** Partyreg
**Sent:** 10 March 2023 11:39 AM
**To:** [redacted]>
**Subject:** PR23-12 comments due by Friday 17th March CCM:0497161

Dear all,

Louise has come to an initial view on the below application (link below) and we would now be grateful for your views by **noon Friday 17th March**. It is worth noting that this is one of our longer assessments, thus do keep time constraints in mind.

| **Party name** | **Type of assessment** |
| --- | --- |
| | |

| | |
|---|---|
| Patriotic Alternative | New party application |

Below is a list of resources for approvals board members:

| **Approvals Board resources** | |
|---|---|
| Briefing paper – The party registration approval board | This document sets out the registration process, role of the board and the legislative tests and policy framework. |
| Party Registration Decision Database | This document contains a number of historic or complex decisions (2015 onwards) that have helped define our approach to the statutory tests. |
| Party registration Legal Advise Log | A log of legal advice requested by the registration team, including advice relevant to the interpretation of the statutory tests and for assessments. |
| Finalised Decisions | Our published registration decisions from 2015 onwards. |
| 2023 application summaries | Links to all of our assessments for 2023.<br>Includes the 3 most recently finalised summaries: PR23-07, PR23-08, PR23-09. |

If you are unable to provide your views by **noon Friday 17th March** due to other commitments, please inform the party registration team and make arrangements with your delegate listed in the table below.

| **Board Member** | **Delegate** |
|---|---|
| **Director of Regulation (delegated decision maker)** | Director of Electoral Administration |
| Senior Lawyer (Regulation) | Head of Legal |
| Head of Policy | Head of Research |
| Head of Registration and Reporting | Head of Enforcement and Monitoring |
| Head of External Communications | Director of Communications |
| Head of Commission, Scotland | Manager, Scotland |
| Head of Commission, Northern Ireland | Manager, Northern Ireland |
| Head of Commission, Wales | Manager, Wales |

Thanks,

[redacted]
**The Electoral Commission**
[redacted]
electoralcommission.org.uk

**From:** [redacted]
**To:**
**Subject:** FW: Patriotic Alternative and Homeland query
**Date:** 25 April 2023 16:43:00

---

[redacted] happy with the below. For any follow-ups on stealth, he'd prefer we handle these over the phone and just explain that the idea of applying by stealth is ultimately something the group hs come up with, we assess all applications against the same criteria set in law and make inquiries on a case by case basis depending on the facts of an application

Thanks, [redacted]

---

**From:** [redacted]
**Sent:** Tuesday, April 25, 2023 3:39 PM
**To:** [redacted]
**Subject:** Patriotic Alternative and Homeland query

Hi [redacted],

We've had a query from a journalist at Vice writing about Patriotic Alternative and Homeland. They wanted in writing information about every single time the PA application has been rejected as well as info on Homeland. Specifically they wanted info on whether an application by stealth would be something we can detect, if it's against electoral law, and if it is indeed easier to change a party's name.

I've drafted a response below, please can you take a quick look? I'm not sure how to address that point re:stealth?

Deadline is EoD today.

Thanks,
[redacted]

##

Hi [redacted],

Thanks for your call earlier. Below is some background information which I hope you will find useful. There is more information about how political parties are registered on our website. If a party is registered with us, its entry can be found on the public registers of political parties. You can search for entries on the registers on our website. We also publish the details of applications which we are currently considering on our website, as well as the details of our decisions once they have been made.

**Background information on Patriotic Alternative**

- Patriotic Alternative has applied to be registered as a political party seven times. We refused its last application (submitted in January 2023) as the

party's constitution and financial scheme were not compliant with the law. The constitution did not accurately set out the structure and organisation of the party, and the financial scheme was not properly adopted.

- The party has applied to be registered six times previously: in October 2019, February 2020, October 2020, February 2021, February 2022 and May 2022.

- On the first and second applications, we were not satisfied that the party's submitted constitution and financial scheme met the requirements set out in law. We refused the party's third and fourth applications because the submitted constitution did not adhere to equalities law, in that it contained provisions that would indirectly discriminate against persons with protected characteristics from becoming members of the party. On the fifth and sixth applications, we were not satisfied that the party's submitted constitution and financial scheme met the requirements set out in law.

**Background information on Homeland**

- It is not currently registered as a party with us, and we have not received an application to register a party under this name.

**On the process for registering parties**

- All applications to register a political party are subject to detailed assessment against the criteria set out in law, including on whether the party's application and identity marks met the criteria set out in electoral law, as well as legal obligations under equality laws. As part of this process, we assess whether the party's constitution and membership policy would breach equalities law.

- An application to register a new political party must specify the names of the people the party intends to be registered as the party's officers. If the application is approved then the party officers' names will be listed on their entry on the register. However, party officers' names would not be publicly available during the assessment process as it is considered personal data.

- It is legal for a party to apply to be registered under a certain name, and then submit an application to change its name once it has been registered. When we receive an application to register a new party name, the details of the new name are published online so members of the public can input their views. Views can be submitted on this page of our website. All applications to register a new party name are subject to detailed assessment against legal criteria

- It is not for the Commission to assess or comment on a party's political views or policies. That is for voters to decide. The Political Parties, Elections and Referendums Act 2000 (PPERA) sets out criteria that parties must meet in order to register. If an application meets those tests, the Commission must register the party.

[redacted]
[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 26 May 2023 1:32 PM
To: Press[redacted]@electoralcommission.org.uk>
Subject: White nationalist

Hi,

I'm writing an article about the white nationalist group Homeland, which split from Patriotic Alternative (PA), having applied to become a political party.

The group has made an application to the Electoral Commission under the name Homeland Party, which is currently under review.

Please can you comment on the above by close of play today, if that's enough time?

Thanks for your help,

[redacted]

**Details**

We recently reported how [redacted], a former British National Party (BNP) Scottish organiser and election candidate, who [redacted], led a breakaway faction to form a Homeland after the fracturing of PA, according to a report by Red Flare.

The Ferret understands the split was owed to a fallout between [redacted] and PA's leader Mark Collett, also a former BNP figurehead. [redacted] and allies were apparently frustrated by PA's repeated failure to gain registration as a political party, as well as a focus on online, rather than real-life activism.

This is the second split within a month at PA, according to anti-fascist magazine, Searchlight, after Hitler lookalike, [redacted], broke away to form a military style splinter group, the National Support Detachment.

Earlier in May, we reported that [redacted] is billed as a keynote speaker in a rally in Elgin on 17 June by the extremist Highland Division – yet another PA splinter group.

Last year The Ferret gained access to a private chat group where a man, who claimed to be from [redacted], shared a picture of a weapons collection. It included 13 knives – one of which featured the Nazi swastika – two axes and a knuckleduster.

[redacted] used the private chat group to recruit the man – who later left to form Highland Division – and other users to PA Scotland.

--

[redacted]

[redacted]
The Ferret
[redacted]

*To email me securely, sign-up to Protonmail for end-to-end encryption. My Protonmail address is:* [redacted]

The Ferret is an investigative journalism platform owned by its writers and subscribers. Please consider subscribing from just £3 per month: https://theferret.scot/subscribe/

**From:** [redacted]
**To:**
**Subject:** FW: [redacted] - Patriotic Alternative CCM:0288374
**Date:** 29 June 2023 15:29:53

---

[redacted]

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electoralcommission.org.uk

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**From:** [redacted]
**Sent:** Tuesday, May 2, 2023 6:24 PM
**To:** Partyreg <Partyreg@electoralcommission.org.uk>
**Subject:** Re: [redacted] - Patriotic Alternative CCM:0288374

[redacted]

Thank you for the reply. It was just according the audio recording of their former admin officer they had presented information in their last application stating they only had one bank account whereas the admin officer, [redacted] personal account was being used for PA payments. Donations would be received through the website and those donations would then go to his account. Then they would be transferred back to the PA account or one of the directors.

PA were not able to receive payments via their website as such after their banking facility had been removed hence the unorthodox arrangement that developed in August 2022.

Also, each PA region had it's own bank account, usually, two, though usually in a manner which it would not be possible to tell as it would be usually in the name of a regional officer.

The regions being PA Scotland, PA North East, PA North West, PA Wales, PA West Mids, PA East Mids, PA East of England, PA South East and PA South West. PA London were already defunct.

As nearly all the regional officers would have left during this split in the group it is unclear what banking facilities remained.

So it's not so much about funding, etc...but statements they made during the application process and given the number of times they have attempted to apply to be a political party I thought it was something to be aware of should they choose to do so again.

Also, within the audio recording , the former PA admin officer who has set up another organisation, Homeland Party, will attempt to register as political party, it did not sound entirely orthodox as how they would be applying. Though this has already been reported in the media so you are probably aware of this situation.

Kind regards,

[redacted]

[redacted]

------- Original Message -------
On Tuesday, May 2nd, 2023 at 18:09, Partyreg <Partyreg@electoralcommission.org.uk> wrote:

Dear [redacted]

Thank you for providing this information.

We are not currently in receipt of an application for Patriotic Alternative. Where Patriotic Alternative are not currently registered with us, they do not fall within our regulatory regime and as such rules around donations and recording of funds do not apply. Where that is the case, we cannot take any action relating to this information at this time.

If we receive any relevant applications in the future, then we will consider this information as part of our formal assessment process.

When applications are received, we publish them for public comment on our website. You are welcome to subscribe to notifications for updates to this page which happen weekly and comment on any applications that we receive.

If you wish to discuss this matter further, please feel free to contact us via this email address.

Kind regards,

[redacted]

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electoralcommission.org.uk

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**From:** [redacted]
**Sent:** 22 April 2023 8:37 AM
**To:** Public Info <info@electoralcommission.org.uk>; Public Info <info@electoralcommission.org.uk>
**Subject:** other

Submitted on 22 April 2023

Submitted values are:

## Name

**First name**
[redacted]

**Last name**
[redacted]

**Your email**
[redacted]

**Your region/country**
[redacted]

**I am...**
a member of the public

**What are you contacting us about?**
other

**Your question**
There is an audio recording with regards to two political organisations which I think the EC need to listen. They refer to Patriotic Alternative who have had their application rejected multiple times. The recording is made by the former admin officer, [redacted] and has been posted on a former PA members YouTube channel - [redacted] was essentially third in command of PA. In it makes claims how PA had multiple bank accounts and even one [redacted] set up himself PA payments yet it seems the EC were only told about one.

Also, talks about "hiding" donations, couldn't quite pick up what was meant by that, but I think it refers to how donations from the web page, then encrypted. I couldn't follow it.

[redacted] has formed his own group, Homeland, and they have or applied to be political party but in the recording he states that it will be done by 2/3 people who are unknown to the EC, i.e. not appeared in numerous newspaper headlines for being involved in the far right such as [redacted] -

Background to the split -
https://www.searchlightmagazine.com/2023/04/breaking-news-patriotic-alternative-split/

Link to audio on a Youtube channel (it has been leaked in numerous other locations)

https://www.youtube.com/watch?v=RB6P8bv29TA

Morning [redacted],

If you have the time, would it be okay to pull this an hour forward?

Just have a query on 23-12 and PA that I would like to resolve asap!

Thanks,

[redacted]

[redacted]

**From:** [redacted]
**Sent:** 10 January 2023 16:50
**To:** [redacted]
**Subject:** PA

Hi [redacted]

I hope the meeting this morning went okay and without any difficulties, and things were resolved as well as could be.

Thanks

[redacted]

[redacted]

**The Electoral Commission**
[redacted]

electoralcommission.org.uk

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***If you need to serve any documents on the Commission, please contact me to arrange service. We do not accept service electronically***

[redacted]

**From:** [redacted]
**Sent:** 17 January 2022 14:46
**To:** [redacted] Press
**Subject:** RE: Campaign leaflets - Southend West - BBC Essex

Hi [redacted],

Thanks for the email and for sharing these links.

As I mentioned on the phone, the Commission's remit when it comes to campaign material relates to whether printed material has an imprint. The law (Political Parties, Elections and Referendums Act 2000) requires all printed election material to carry an imprint, setting out the source of the material. An imprint includes the name and address of the printer and promoter (the person who authorised the material to be printed). It must be included on all printed material such as posters, placards and leaflets so that voters can see the source of the campaign material. It is an offence not to include an imprint on printed election material. The Commission regulates party and campaigner compliance with this rule. As you point out in your email, the leaflets seem to have an imprint included.

We encourage all campaigners to undertake their role responsibly and to support transparency but under electoral law there are no controls on the content or presentation of campaign material so we don't have a role in regulating how the material is designed.

Best wishes,
[redacted]

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

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**From:** [redacted]
**Sent:** 17 January 2022 13:29
**To:** Press <press@electoralcommission.org.uk>
**Subject:** Campaign leaflets - Southend West - BBC Essex

Hi there,

[redacted], I just spoke to one of the team.

These leaflets have apparently been posted in doors in Southend West:

- https://twitter.com/forgetcape/status/1482345872797184004/photo/1
- https://www.echo-news.co.uk/news/19852033.bogus-election-leaflets-delivered-southend/

It is designed so that it appears to be Conservative Party material, but as it says in the small print on the second page, it's 'printed and published by the Campaign for Truth in Politics'. It's the same registered address as a group named Patriotic Alternative.

Have you had any reports and is it something the Electoral Commission acts upon?

Can I please have a response before 4.45pm? My colleagues are going to mention it on the radio.

Best,

[redacted]

[redacted]

**From:** [redacted]
**Sent:** 25 April 2023 14:20
**To:** [redacted]; Press
**Subject:** RE: Daily Record: 'False' applications

Hi [redacted]

Good to speak just now. As discussed, I've included some broad background information on how we assess applications for new parties which may help for whatever you write.

Homeland is not currently registered as a party with us, and we have not received an application to register a party under this name.

All applications to register a political party are subject to detailed assessment against the criteria set out in law, including on whether the party's application and identity marks met the criteria set out in electoral law, as well as legal obligations under equality laws. As part of this process, we assess whether the party's constitution and membership policy would breach equalities law.

If a party is registered with us, its entry can be found on the public registers of political parties. You can search for entries on the registers on our website. We also publish the details of applications which we are currently considering on our website, as well as the details of our decisions once they have been made.

For further context, an application to register a new political party must specify the names of the people the party intends to be registered as the party's officers. If the application is approved then the party officers' names will be listed on their entry on the register. However, party officers' names would not be publicly available during the assessment process as it is considered personal data.

There is more information about how political parties are registered on our website.

All the best

[redacted]

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

[redacted]

**From:** [redacted]
**Sent:** Tuesday, April 25, 2023 12:07 PM
**To:** Press <press@electoralcommission.org.uk>
**Subject:** Daily Record: 'False' applications

Afternoon all,

[redacted] from the Daily Record here - hope you're well. I'm getting in touch with regards to a recent report by anti-fascist researchers Red Flare into Homeland, a new political organisation linked to Patriotic Alternative. Recordings obtained by Red Flare, verified by the Daily Record, state that Homeland intends to register with the Electoral Commission under a fake name with "squeaky clean" officers in order to legitimise what is alleged to be a far-right fascist organisation with goals of political office. (Red Flare's report can be read here: https://redflare.info/Homeland_British_fascism_fractures-RF.pdf)

In a recording, [redacted], a former regional organiser with PA, said: "We'll be putting in an application that does not look like it's connected to anybody else, and it won't even be under the Homeland name, initially. It is far easier to change a political party's name after the fact than it is to get it registered, and I think if we went straight in with "Homeland" and well known personalities, we'd probably face exactly the same struggles as Patriotic Alternative."

With regards to this - and by means of a **general comment** on applications in this vein: would such an application, in theory, be a breach of the rules on political party registration, and would it amount to a breach of the law?

Grateful for any assistance you can offer with my query for close of play today (Tuesday) for publication in a story tomorrow. Many thanks in advance - I'm on [redacted] if you have any queries.

Kind regards,

[redacted]

--

[redacted]

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[redacted]

**From:** Louise Edwards
**Sent:** 08 March 2023 15:56
**To:** Partyreg; [redacted]
**Subject:** RE: Patriotic Alterative - assessment

Thanks [redacted], that's really helpful. I'll have a read through now to start pondering the issues, and then pick it up again tomorrow when you've had a chance to finish it.

Louise

---

**From:** Partyreg <Partyreg@electoralcommission.org.uk>
**Sent:** 08 March 2023 2:03 PM
**To:** Louise Edwards [redacted]
**Subject:** Patriotic Alterative - assessment

Hi Louise,

Given there will be a bit of time in your diary with the directorate meeting cancelled, thought I'd try and get in a first look at this assessment.

http://skynet/dm/Functions/PEFreg/New%20Applications/2023-02-03-Patriotic%20Alternative-RP1.docx?web=1

This assessment is not finished yet, but I'm aware that it will take some time to look at. Below is where each item that requires a recommendation is at:

| Item | status |
|---|---|
| Application form | complete |
| Asset and liability record | Pending, will likely concluded compliant |
| Constitution | Assessment finalised, summary in progress |
| Financial scheme | Pending, likely conclude it is not consistent with the constitution and therefore not adopted. |
| name | complete |

I'll have it finished by COB. I will be recommending rejecting the constitution on a number of grounds and I recommend reading that section as its over 7 pages and relatively detailed.

Cheers,

[redacted]

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[redacted]

**From:** [redacted]
**Sent:** 17 January 2023 18:06
**To:** [redacted]
**Subject:** RE: PA assessment

Hi [redacted],

Just to add to [redacted] list, here is the correspondence that I sent to PA outlining the points they raised in the meeting. Here is a link to the meeting note for internal use. Happy to chat through any of it if that would help.

[redacted] – happy with that in terms of approach, agree that there's a benefit to being upfront about length of time but that we do still intend to have a decision before close of noms. If the party were to submit a complex application on 20 January, the 45 working day KPI date would be 24 March, which is a week before the final 31 March date for registration of new parties ahead of close of noms.

Also agree about not seeking amendments – we told the party in the meeting that we were unlikely to be in a position to do this, and they had opportunity through the meeting itself to ask questions.

FYI I spoke with [redacted] today in the office. If we need legal advice or views, he's happy to assist if available.

Cheers,

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

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**From:** [redacted]
**Sent:** 13 January 2023 4:55 PM
**To:** [redacted]
**Subject:** RE: PA assessment

Hi [redacted],

I have added documents to the table below. In terms of conversations about crypto and financial matters with the party, Maj and Louise suggested at the time we keep them very generic. Happy to discuss this further with you.

| Theme | Link to documents |
|---|---|
| [redacted] | |

| | |
|---|---|
| [redacted] | [redacted] |
| [redacted] | |
| [redacted] | |
| [redacted] | |
| Email regarding party's financial procedures | Link |
| Last decision Letter | Link |

Thanks,

[redacted]

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**From:** [redacted]
**Sent:** 12 January 2023 5:12 PM
**To:** [redacted]
**Subject:** PA assessment

Hi both,

[redacted] told me following his meeting with the party, they are likely to submit prior to the 20 Jan deadline. I would appreciate it both of you could provide me with any relevant documents to past assessments and from the intervening time.

I am particularly interested in:

- [redacted]
- any discussions with the party around crypto or any other financial matters
- notes from the recent meeting with the party
- a summary of our recent conversations with the party.

Anything else you think might be useful would be appreciated. With the new ALR requirements, I anticipate that this will likely be one of the most complex assessments we have carried out.

[redacted] – given your expertise on this party, I will likely need to contact you about certain aspects for additional context and or explanation. I imagine this will be more the case early on. I'll try and book something into diaries if necessary.

[redacted] – Although we haven't received the application yet, I think we need to be upfront with the party regarding timing of a decision. Once received, I will send an acknowledgement receipt. I will then spend a day or two reviewing the application with the intention of determining whether it is indeed complex. If it is, my plan will be to set this out to the party and that a decision will likely be made near the close of nominations and outside of our usual 6/7 weeks target.

Can you confirm if there are issues with this approach?

Given that timing will be an acute issue, I am unlikely to seek amendments from the party on any elements of their application. Currently, I am satisfied that we can justify such an approach on the basis that the complexity of the application will likely mean that it pushes the close of nominations without any unforeseen delays and that the party have already received heightened levels of guidance via your meeting with them.

Again, can you confirm if there any issues with this approach?

Cheers,

[redacted]

**The Electoral Commission**
electoralcommission.org.uk

[redacted]

**From:** Louise Edwards
**Sent:** 09 March 2023 12:44
**To:** Partyreg; [redacted]
**Subject:** RE: Patriotic Alterative - assessment

Hi [redacted]

Thanks for your message letting me know this assessment was complete. I have now added my initial views.

It's one of our longer assessments – worth flagging that to the AB members so they can put a little time aside for it.

Thanks

Louise

---

**From:** Partyreg <Partyreg@electoralcommission.org.uk>
**Sent:** 08 March 2023 2:03 PM
**To:** Louise Edwards [redacted]
**Subject:** Patriotic Alterative - assessment

Hi Louise,

Given there will be a bit of time in your diary with the directorate meeting cancelled, thought I'd try and get in a first look at this assessment.

http://skynet/dm/Functions/PEFreg/New%20Applications/2023-02-03-Patriotic%20Alternative-RP1.docx?web=1

This assessment is not finished yet, but I'm aware that it will take some time to look at. Below is where each item that requires a recommendation is at:

| Item | status |
|---|---|
| Application form | complete |
| Asset and liability record | Pending, will likely concluded compliant |
| Constitution | Assessment finalised, summary in progress |
| Financial scheme | Pending, likely conclude it is not consistent with the constitution and therefore not adopted. |
| name | complete |

I'll have it finished by COB. I will be recommending rejecting the constitution on a number of grounds and I recommend reading that section as its over 7 pages and relatively detailed.

Cheers,

[redacted]

**The Electoral Commission**
electoralcommission.org.uk

[redacted]

**From:** [redacted]
**Sent:** 29 March 2023 15:53
**To:** [redacted]
**Subject:** RE: PA

Hi [redacted],

I've tweaked the lines a bit to reflect the decision reasons, and updated the past applications to bring all dates consistent to when the party applied to register.

[redacted] and [redacted] are ironing out a few last points on the decision correspondence to the party, and then we'll be ready to process. I've asked [redacted] to make sure that ext. comms are informed once a decision has been processed.

Cheers!

## Patriotic Alternative

**Decision – March 2023**

We refused Patriotic Alternative's application to register as a political party as the party's constitution and financial scheme were not compliant with the law. The constitution did not accurately set out the structure and organisation of the party, and the financial scheme was not properly adopted.

**Past applications:**

The party has applied to be registered six times previously: in October 2019, February 2020, October 2020, February 2021, February 2022 and May 2022.

On the first and second applications, we were not satisfied that the party's submitted constitution and financial scheme met the requirements set out in law. We refused the party's third and fourth applications because the submitted constitution did not adhere to equalities law, in that it contained provisions that would indirectly discriminate against persons with protected characteristics from becoming members of the party. On the fifth and sixth applications, we were not satisfied that the party's submitted constitution and financial scheme met the requirements set out in law.

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

**From:** [redacted]
**Sent:** 28 March 2023 10:58 AM
**To:** [redacted]
**Subject:** PA

# Patriotic Alternative

**Decision – October 2022**

We refused Patriotic Alternative's application to register as a political party as the party's constitution and financial scheme were not compliant with the law. The constitution did not accurately set out the structure and organisation of the party, and the financial scheme was not properly adopted and did not properly set out arrangements for regulating the financial affairs of the party.

**Past applications:**

The party has applied to be registered five times previously: in October 2019, February 2020, October 2020, February 2021 and April 2022.

On each occasion, we were not satisfied that the party's constitution met the requirements set out in law. In addition, we refused the party's application in July 2021 because the constitution did not adhere to equalities law. It contained provisions that would indirectly discriminate against persons with protected characteristics from becoming members of the party.

[redacted]

**The Electoral Commission**
electoralcommission.org.uk

[redacted]

[redacted]

**From:** [redacted]
**Sent:** 12 January 2023 16:49
**To:** Louise Edwards
**Subject:** RE: PA meeting email

Thanks for looking at this so quickly! Will send now.

---

**From:** Louise Edwards [redacted]
**Sent:** 12 January 2023 4:40 PM
**To:** [redacted]
**Subject:** RE: PA meeting email

Yep easily accessed and that looks great. Comprehensive and clear with links to all the necessary guidance. Go ahead and send when you're ready.

Thanks for this.

Louise

---

**From:** [redacted]
**Sent:** 12 January 2023 4:31 PM
**To:** Louise Edwards [redacted]
**Subject:** PA meeting email

Hi Louise,

See attached. Hoping onedrive will let you access easily – shout if not.

Cheers,

[redacted]

[redacted]
electoralcommission.org.uk

**From:** Partyreg
**To:** [redacted]
**Subject:** RE: Account Deletion CCM:0288391
**Date:** 17 May 2023 11:48:19

---

Dear [redacted]

I can confirm that your user account has been removed from the Patriotic Alternative party account.

Yours sincerely,

The Registration Team

**The Electoral Commission**
electoralcommission.org.uk

---

**From:** [redacted]
**Sent:** Saturday, May 13, 2023 8:54 AM
**To:** PEFinbox <pefinbox@electoralcommission.org.uk>
**Subject:** Account Deletion

Dear Sir/Madam,

I currently have an account set up on pefonline.electoralcommission.org.uk with the username [redacted] but I am unable to delete that account.

I am no longer associated with the organisation Patriotic Alternative, for which that account was set up and wish to be removed from the application process for them and have that account profile deleted.

I no longer have access to the [redacted] email, but the address and telephone numbers associated with that account are still my own.

Please confirm when this account is deleted from your system and that the organisation above will no longer see my personal information associated with Patriotic Alternative when they log in.

Thanks in advance.

Regards,

[redacted]

[redacted]

**From:** Louise Edwards
**To:** [redacted]
**Cc:**
**Subject:** RE: Patriotic alternative - decision draft CCM:0288359
**Date:** 30 March 2023 17:10:12

---

Thanks all for this. I believe it signifies the meeting of our guarantee to take decisions on applications received by 20 January before close of nominations, which is not a small achievement by the team. Well done.

Louise

---

**From:** [redacted]>
**Sent:** Thursday, March 30, 2023 4:15 PM
**To:** [redacted]
**Cc:** [redacted]
**Subject:** RE: Patriotic alternative - decision draft CCM:0288359

This is now live on our decisions page - https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/party-registration-applications/party-registration-decisions

Dated 20 March as the date of decision.

Cheers,

[redacted]

**The Electoral Commission**
electoralcommission.org.uk

---

**From:** [redacted]
**Sent:** 30 March 2023 3:01 PM
**To:** [redacted]
**Cc:** [redacted]
**Subject:** RE: Patriotic alternative - decision draft CCM:0288359

It is now sent. [redacted] is working on publication of the decision for this afternoon

[redacted]

**The Electoral Commission**
electoralcommission.org.uk

**From:** [redacted]
**Sent:** 30 March 2023 1:44 PM
**To:** Louise Edwards [redacted]
**Cc:** [redacted]
**Subject:** RE: Patriotic alternative - decision draft CCM:0288359

Hi All,

[redacted] and I have both proofread this and accepted all the changes and it's now ready to go.

[redacted] has confirmed with me that there are comms lines ready and we are just waiting for the website to be updated then I will send this.

Cheers,

[redacted]

**The Electoral Commission**
electoralcommission.org.uk

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

**From:** Partyreg <Partyreg@electoralcommission.org.uk>
**Sent:** 20 March 2023 12:23 PM
**To:** Louise Edwards [redacted]
**Subject:** RE: PR23-12 comments due by Friday 17th March CCM:0497161

Hi Louise,

The application below is ready for a final decision. Can you let us know when you've provided this?

Thanks,

[redacted]

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

**From:** Partyreg
**Sent:** 10 March 2023 11:39 AM
**To:** Party Registration Approval Board
[redacted]
**Subject:** PR23-12 comments due by Friday 17th March CCM:0497161

Dear all,

Louise has come to an initial view on the below application (link below) and we would now be grateful for your views by **noon Friday 17th March**. It is worth noting that this is one of our longer assessments, thus do keep time constraints in mind.

| **Party name** | **Type of assessment** |
|---|---|
| Patriotic Alternative | New party application |

Below is a list of resources for approvals board members:

| **Approvals Board resources** | |
|---|---|
| Briefing paper – The party registration approval board | This document sets out the registration process, role of the board and the legislative tests and policy framework. |
| Party Registration Decision Database | This document contains a number of historic or complex decisions (2015 onwards) that have helped define our approach to the statutory tests. |
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| 2023 application summaries | Links to all of our assessments for 2023.<br>Includes the 3 most recently finalised summaries:<br>PR23-07, PR23-08, PR23-09. |

If you are unable to provide your views by **noon Friday 17th March** due to other commitments, please inform the party registration team and make arrangements with your delegate listed in the table below.

| **Board Member** | **Delegate** |
|---|---|
| **Director of Regulation (delegated decision maker)** | Director of Electoral Administration |
| Senior Lawyer (Regulation) | Head of Legal |
| Head of Policy | Head of Research |
| Head of Registration and Reporting | Head of Enforcement and Monitoring |
| Head of External Communications | Director of Communications |
| Head of Commission, Scotland | Manager, Scotland |

| | |
|---|---|
| Head of Commission, Northern Ireland | Manager, Northern Ireland |
| Head of Commission, Wales | Manager, Wales |

Thanks,

[redacted]

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

**From:** [redacted]
**To:**
**Subject:** RE: Patriotic Alternative
**Date:** 15 May 2023 14:51:11

---

OK. Cheers

---

**From:** [redacted]@electoralcommission.org.uk>
**Sent:** Monday, May 15, 2023 2:07 PM
**To:** [redacted]@electoralcommission.org.uk>
**Cc:** [redacted]@electoralcommission.org.uk>
**Subject:** RE: Patriotic Alternative

Hi [redacted]

I'm not sure but I can't see it anymore either. Perhaps only available to people in the posters network.

Not the end of the world as we've taken a note from it and the video was referenced in the media.

Cheers,

[redacted]

**The Electoral Commission**
electoralcommission.org.uk

---

**From:** [redacted]es@electoralcommission.org.uk>
**Sent:** 15 May 2023 1:54 PM
**To:** [redacted]@electoralcommission.org.uk>
**Cc:** [redacted]@electoralcommission.org.uk>
**Subject:** Patriotic Alternative

Hi [redacted]

In reference to your request for a transcript of the YouTube video featuring the conversations on the Patriotic Alternative split, the link to the video says it is unavailable and private – could it have been taken down?

Thanks

[redacted]

[redacted]

**The Electoral Commission**
[redacted]

electoralcommission.org.uk

**From:** [redacted]
**To:**
**Subject:** RE: PR23-12 comments due by Friday 17th March CCM:0497161
**Date:** 16 March 2023 08:28:30

---

Thanks for sending this out [redacted]

I'll keep an eye on the comments today (we have a couple so far) and will chase up any that are needed later this afternoon.

Cheers,

[redacted]

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

---

**From:** Partyreg <Partyreg@electoralcommission.org.uk>
**Sent:** 14 March 2023 5:27 PM
**To:** Party Registration Approval Board
[redacted]
**Cc:** [redacted]
**Subject:** RE: PR23-12 comments due by Friday 17th March CCM:0497161

Hi all,

Just a reminder that comments on this application are due on Friday, and none have been added yet. As this application is complex and has a high level of risk attached, I would urge board members to give themselves adequate time to engage fully with the analysis in the assessment.

If it would be helpful to have some time put in your calendars to consider the assessment, please contact [redacted] about this. [redacted] is the case owner for this application and so [redacted] can arrange timings when [redacted] is also free, and can be on hand to answer questions you might have.

Cheers,

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

---

**From:** Partyreg <Partyreg@electoralcommission.org.uk>
**Sent:** 10 March 2023 11:39 AM

**To:** Party Registration Approval Board

[redacted]

**Subject:** PR23-12 comments due by Friday 17th March CCM:0497161

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| Head of Policy | Head of Research |

| | |
|---|---|
| Head of Registration and Reporting | Head of Enforcement and Monitoring |
| Head of External Communications | Director of Communications |
| Head of Commission, Scotland | Manager, Scotland |
| Head of Commission, Northern Ireland | Manager, Northern Ireland |
| Head of Commission, Wales | Manager, Wales |

Thanks,

[redacted]

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

**From:** Craig Westwood
**To:** [redacted]
**Cc:** [redacted]; Niki Nixon
**Subject:** RE: PR23-12 comments due by Friday 17th March CCM:0497161
**Date:** 14 March 2023 19:22:07

---

Thanks [redacted] – and thanks [redacted] for the detailed, excellent assessment. I have added comments.

Craig

---

**From:** Partyreg <Partyreg@electoralcommission.org.uk>
**Sent:** Tuesday, March 14, 2023 5:27 PM
**To:** Party Registration Approval Board
[redacted]
**Cc:** [redacted]
**Subject:** RE: PR23-12 comments due by Friday 17th March CCM:0497161

Hi all,

Just a reminder that comments on this application are due on Friday, and none have been added yet. As this application is complex and has a high level of risk attached, I would urge board members to give themselves adequate time to engage fully with the analysis in the assessment.

If it would be helpful to have some time put in your calendars to consider the assessment, please contact [redacted] about this. [redacted] is the case owner for this application and so [redacted] can arrange timings when [redacted] is also free, and can be on hand to answer questions you might have.

Cheers,

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

---

**From:** Partyreg <Partyreg@electoralcommission.org.uk>
**Sent:** 10 March 2023 11:39 AM
**To:** Party Registration Approval Board
[redacted]
**Subject:** PR23-12 comments due by Friday 17th March CCM:0497161

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Louise has come to an initial view on the below application (link below) and we would now be grateful for your views by **noon Friday 17th March**. It is worth

noting that this is one of our longer assessments, thus do keep time constraints in mind.

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| Head of External Communications | Director of Communications |
| Head of Commission, Scotland | Manager, Scotland |
| Head of Commission, Northern Ireland | Manager, Northern Ireland |
| Head of Commission, Wales | Manager, Wales |

Thanks,

[redacted]

[redacted]

**The Electoral Commission**

[redacted]

electoralcommission.org.uk

**From:** Tom Hawthorn
**To:** [redacted]
**Cc:**
**Subject:** RE: PR23-12 comments due by Friday 17th March CCM:0497161
**Date:** 14 March 2023 17:29:02

---

Thanks [redacted], just to reassure I've spent some time reviewing the application summary already, and planning to come back to it again on Thursday to add my comments.

Cheers,

Tom

**Tom Hawthorn**
Head of Policy

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

---

**From:** Partyreg <Partyreg@electoralcommission.org.uk>
**Sent:** Tuesday, March 14, 2023 5:27 PM
**To:** Party Registration Approval Board
[redacted]
**Cc:** [redacted]
**Subject:** RE: PR23-12 comments due by Friday 17th March CCM:0497161

Hi all,

Just a reminder that comments on this application are due on Friday, and none have been added yet. As this application is complex and has a high level of risk attached, I would urge board members to give themselves adequate time to engage fully with the analysis in the assessment.

If it would be helpful to have some time put in your calendars to consider the assessment, please contact [redacted] about this. [redacted] is the case owner for this application and so [redacted] can arrange timings when [redacted] is also free, and can be on hand to answer questions you might have.

Cheers,

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

---

**From:** Partyreg <Partyreg@electoralcommission.org.uk>

**Sent:** 10 March 2023 11:39 AM
**To:** Party Registration Approval Board
[redacted]
**Subject:** PR23-12 comments due by Friday 17th March CCM:0497161

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| Senior Lawyer (Regulation) | Head of Legal |

| | |
|---|---|
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| Head of External Communications | Director of Communications |
| Head of Commission, Scotland | Manager, Scotland |
| Head of Commission, Northern Ireland | Manager, Northern Ireland |
| Head of Commission, Wales | Manager, Wales |

Thanks,

[redacted]

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

**From:** [redacted]
**To:**
**Subject:** RE: Regulatory Intelligence Bulletin - 25.02.2023 - 03.03.2023
**Date:** 09 March 2023 08:47:15
**Attachments:** image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
image008.png
image009.png
image010.png

---

OK

**From:** [redacted]@electoralcommission.org.uk>
**Sent:** 08 March 2023 5:20 PM
**To:** [redacted]@electoralcommission.org.uk>
**Subject:** RE: Regulatory Intelligence Bulletin - 25.02.2023 - 03.03.2023

Yes, I think it would be very useful for future assessments to have this available. I won't need anything for this assessment (it's finalised) but there will likely be others and it could be more relevant then.
Thanks!

[redacted]

**The Electoral Commission**
electoralcommission.org.uk

**From:** [redacted]@electoralcommission.org.uk>
**Sent:** 03 March 2023 1:13 PM
**To:** [redacted]@electoralcommission.org.uk>
**Subject:** RE: Regulatory Intelligence Bulletin - 25.02.2023 - 03.03.2023

[redacted]

Yes, we did get wind that you were looking at the PA – I have not created a specific search word for Patriotic Alternative – but am very happy to do so if it helps in the future. Also we are creating compliance profiles on a lot of parties and campaigners at the moment, I can add Patriotic Alternative to the list of those to do if you wish, it would be ready to view next week, if that's OK.
There are a few articles in the archive that I have taken over the last few months:

17.01.2022 - **Bogus election leaflets being delivered in Southend** (Basildon, Canvey and Southend Echo)
02.04.2022 - **Labour councillor confronts men delivering 'racist' leaflets in Plymouth** (Plymouth Herald)
18.04.2022 – **MSP hits out at "attempts to stir up racial hatred" as far right leaflets posted in Dumbarton** (Daily Record)
09.05.2022 - **Far-right group 'distributed fake Labour and Tory leaflets in bid to influence by-elections** (The Independent)
22.05.2022 – **Revealed: Supporters of Scots far-right group possess weapons** (The Ferret)
19.11.2022 – **Far right group posts hundreds of leaflets opposing use of Snowdonia hotel** (Daily Post)
16.11.2022 - **Patriotic Alternative leader guilty of firearms charges** (The Ferret)
Hope this helps

Thanks
[redacted]

**From:** [redacted]@electoralcommission.org.uk>
**Sent:** 03 March 2023 12:45 PM
**To:** [redacted]@electoralcommission.org.uk>
**Subject:** RE: Regulatory Intelligence Bulletin - 25.02.2023 - 03.03.2023

Hi [redacted]
Saw the Patriotic Alternative mention in this. Wondered if your team had any more intel on the party from the last few months? Not sure if you'd been tracking them. I'm currently doing an assessment on them and it would be useful context.
Cheers,

[redacted]

**The Electoral Commission**
electoralcommission.org.uk

---

**From:** [redacted]@electoralcommission.org.uk>
**Sent:** 03 March 2023 11:46 AM
**To:** RAP [redacted]@electoralcommission.org.uk>; Regulation Directorate [redacted]@electoralcommission.org.uk>; Policy Team [redacted]@electoralcommission.org.uk>; Research Team [redacted]@electoralcommission.org.uk>; Legal [redacted]@electoralcommission.org.uk>; Northern Ireland Team [redacted]@electoralcommission.org.uk>; Scotland Team [redacted]@electoralcommission.org.uk>; Wales team [redacted]@electoralcommission.org.uk>
**Cc:** Niki Nixon [redacted]@electoralcommission.org.uk>; [redacted]@electoralcommission.org.uk>; [redacted]@electoralcommission.org.uk>
**Subject:** Regulatory Intelligence Bulletin - 25.02.2023 - 03.03.2023

**Far right leader who led Hull demo charged with ‘stirring racial hatred’ by anti-terrorism police.**
**24.02.2023**
Hull Daily Mail reports that Counter Terrorism Policing North East has charged Sam Melia, a Yorkshire organiser with Patriotic Alternative with publishing and distributing material with the intention to stir up racial hatred. Melia, husband of the organisation’s deputy leader Laura Towler, is alleged to have organised a campaign to stir up protest against the relocation of asylum seekers in the Hull area. Separately The Ferret reports that James Costello, also a member of Patriotic Alternative and a white supremacist organisation called the Creativity Movement, was seen in Knowsley, Merseyside at a violent disturbance outside a hotel housing asylum seekers.

**From:** [redacted]
**To:**
**Cc:**
**Subject:** RE: Urgent comment request - Fascist party attempting to register by stealth
**Date:** 24 April 2023 15:40:11

Hi both,

Sorry just got out of a meeting.

Happy with those lines, with the small amend that party officer names will only go on the party's register entry (see red text in your email).

Give me a shout if there's anything else/further interest in this story.

Cheers,

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

**From:** [redacted]
**Sent:** 24 April 2023 2:56 PM
**To:** [redacted]
**Cc:** [redacted]
**Subject:** RE: Urgent comment request - Fascist party attempting to register by stealth

Hey [redacted],

What do you think of the below? Adding [redacted] for speed so we can send this on quickly. [redacted], the story is up as well: https://novaramedia.com/2023/04/24/fascist-party-patriotic-alternative-in-messy-break-up/

Thanks,
[redacted]

[redacted]

Homeland is not currently registered as a party with us, and we have not received an application to register a party under this name.

All applications to register a political party are subject to detailed assessment against the criteria set out in law, including on whether the party's application and identity marks met the criteria set out in electoral law, as well as legal obligations under equality laws. As part of this process, we assess whether the party's constitution and membership policy would breach equalities law.

If a party is registered with us, its entry can be found on the public registers of political parties. You can search for entries on the registers on our website. We also publish the details of applications which we are currently considering on our website, as well as the details of our decisions once they have been made.

For further context, an application to register a new political party must specify the names of the people the party intends to be registered as the party's officers. If the application is approved then the party officers' names will be listed on ~~our website~~ their entry on the register. However, party officers' names would not be publicly available during the assessment process as it is considered personal data.

There is more information about how political parties are registered on our website.

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**From:** [redacted]
**Sent:** Monday, April 24, 2023 1:38 PM
**To:** [redacted]
**Subject:** RE: Urgent comment request - Fascist party attempting to register by stealth

Hi [redacted],

There are some lines below that should come in handy in terms of the application, and when we do and don't confirm who is involved in party registrations.

I would also like us to take the opportunity to refute the suggestion from [redacted] that our reasons for rejecting PA have been because of their personnel. I've included some lines for info on our reasons for rejecting PA applications in the past.

Do you want to give me a ring once we're both free to chat through this?

**Homeland application**

*Homeland is not currently registered as a party with us.*

*If a party is registered with us, its entry can be found on the public registers of political parties. You can search for entries on the registers on our website.*

*We also publish the details of applications which we are currently considering on our website, as well as the details of our decisions once they have been made.*

*As you may be aware, an application to register a new political party must specify the names of the people the party intends to be registered as the party's officers. Should we approve an application to register a political party, then the party's entry shall include the names of these officers.*

*However, prior to registration, information relating to the names of proposed party officers is not publicly available and so is normally considered to be personal data protected under the Data Protection Act 2018. We do not, therefore, ordinarily disclose the names of the named proposed officers for applicant parties.*

*We assess every application that we receive on case by case basis against the statutory tests, taking into account relevant information and circumstances at the relevant time.*

***Patriotic Alternative***
*Patriotic Alternative has applied to be registered seven times: in October 2019, February 2020, October 2020, February 2021, February 2022, May 2022 and January 2023.*

*On the first and second applications, we were not satisfied that the party's submitted constitution and financial scheme met the requirements set out in law. We refused the party's third and fourth applications because the submitted constitution did not adhere to equalities law, in that it contained provisions that would indirectly discriminate against persons with protected characteristics from becoming members of the party. On the fifth, sixth and seventh applications, we were not satisfied that the party's submitted constitution and financial scheme met the requirements set out in law.*

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

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**From:** [redacted]
**Sent:** 24 April 2023 1:02 PM
**To:** [redacted]
**Subject:** FW: Urgent comment request - Fascist party attempting to register by stealth

Hi [redacted],

We've received the below press query about an application to register a political party called Homeland. Have we received an application wanting to register a party under Homeland?

The query below also looks at a party's plans to register themselves 'under the

radar' but I think we can just explain the registration requirements and what we evaluate.

Thanks,
[redacted]

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**From:** [redacted]>
**Sent:** Monday, April 24, 2023 12:46 PM
**To:** Press <press@electoralcommission.org.uk>
**Subject:** Urgent comment request - Fascist party attempting to register by stealth

Hi there,

I'm a journalist from Novara Media. I'm writing about a new fascist political party, "Homeland", which has been started by former members of neo-Nazi party Patriotic Alternative, which has just undergone a messy split.

At an inaugural meeting of Homeland, audio of which has been leaked online, [redacted], a former Patriotic Alternative activist who led the split, said that he plans to get the party registered with the electoral commission by stealth.

He said: "We have got a team of people who are putting an application [the the electoral commission] in at the moment that are not well-known nationalists who might be on the radar."

"We'll be putting in an application that does not look like it's connected to anybody else, and it won't even be under the Homeland name, initially. It is far easier to change a political party's name after the fact than it is to get it registered, and I think if we went straight in with 'Homeland' and well known personalities, we'd probably face exactly the same struggles as PA... The tactic is basically to get registered essentially with unknowns."

Could you confirm whether you have had such an application? And could you please comment on this fascist party attempting to register itself under the radar as soon as possible today?

We will be running a report on the split shortly - my report is based off of an embargoed publication and I'm in a race to get it out. Sorry about the tight turnaround. If I can clarify anything, do please let me know.

Kind regards,

[redacted] | Novara Media
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**From:** [redacted]
**To:** [redacted]; Louise Edwards; [redacted]
**Cc:**
**Subject:** RE: [redacted] - Patriotic Alternative CCM:0288374
**Date:** 10 May 2023 15:59:16

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Hi [redacted]

Thank you for this and sorry for the delay in responding – just got back from leave.

[redacted] is already keeping an eye on both PA/Homeland and will look into [redacted] more thoroughly and pass on any intelligence worth flagging.
As per the video transcript, I don't think you can download it but we can definitely copy paste it into a document a keep a record for future reference.

Hope it's helpful.

Thanks,
[redacted]

[redacted]

**The Electoral Commission**
[redacted]
electoralcommission.org.uk

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**From:** [redacted]@electoralcommission.org.uk>
**Sent:** Tuesday, May 9, 2023 3:27 PM
**To:** Louise Edwards [redacted]@electoralcommission.org.uk>; [redacted]
[redacted]@electoralcommission.org.uk>
**Cc:** [redacted]@electoralcommission.org.uk>; [redacted]
[redacted]@electoralcommission.org.uk>
**Subject:** RE: [redacted] - Patriotic Alternative CCM:0288374

Hi Louise,

Just to let you know that we have now officially received an application from Homeland with [redacted] as leader. It's been allocated to me but I haven't had a chance to look through it yet. I'll drop you a line if there is anything that needs raising but I intend to deal with this through the usual process if there isn't.

Cheers,

[redacted]

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electoralcommission.org.uk

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**From:** Louise Edwards [redacted]@electoralcommission.org.uk>

**Sent:** 03 May 2023 9:37 AM
**To:** [redacted]@electoralcommission.org.uk>; [redacted]
[redacted]@electoralcommission.org.uk>
**Cc:** [redacted]@electoralcommission.org.uk>; [redacted]
[redacted]@electoralcommission.org.uk>
**Subject:** RE: [redacted] - Patriotic Alternative CCM:0288374

Thank you, [redacted] and I appreciate you and [redacted] going through the recording to get any relevant intel for us.

As the recording is open source we can, if we think it reasonable if we receive an application from PA or Homeland, choose to ask questions off the back of it. Of course, judging whether that is reasonable will depend on the context of any such application. The whole thing about a new application seems a bit off-point. As with any application we'd be looking at the constitutional and financial structures so applying under a different name really doesn't impact anything other than that we'll have to consider a change of name application shortly after registration.

[redacted]

Thanks

Louise

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**From:** [redacted]@electoralcommission.org.uk>
**Sent:** Tuesday, May 2, 2023 6:25 PM
**To:** Louise Edwards [redacted]@electoralcommission.org.uk>; [redacted]
[redacted]@electoralcommission.org.uk>
**Cc:** [redacted]@electoralcommission.org.uk>; [redacted]
[redacted]@electoralcommission.org.uk>
**Subject:** RE: [redacted] - Patriotic Alternative CCM:0288374

This time with a link to the notes… -
http://skynet/dm/Functions/PEFreg/_layouts/15/WopiFrame.aspx?sourcedoc={ff18cd9b-0b92-4438-bdf9-6c12ec04f531}&action=view&source=http%3A%2F%2Fskynet%2Fdm%2FFunctions%2FPEFreg%2FCorrespondence%2FForms%2FDefault%2520view%2Easpx%3FInitialTabId%3DRibbon%252ERead%26VisibilityContext%3DWSSTabPersistence

[redacted]

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**From:** [redacted]
**Sent:** 02 May 2023 6:23 PM
**To:** Louise Edwards [redacted]@electoralcommission.org.uk>; [redacted]
[redacted]@electoralcommission.org.uk>
**Cc:** [redacted]@electoralcommission.org.uk>; [redacted]
[redacted]@electoralcommission.org.uk>
**Subject:** FW: [redacted] - Patriotic Alternative CCM:0288374

Hi both,

We have received an email forwarding a recording of a meeting, headed by [redacted] (now former PA officer). It describes the recently reported split in PA. As noted in the email, there are a number of matters raised in the recording that relate to financial matters that would likely be of concern, were an application to come from PA or this new group, provisionally called Homeland.

[redacted] and I have taken some rough notes from the recording (it is very long) highlighting some issues that would likely be relevant to an application. Particularly, I note that [redacted] is looking at having an application submitted to us under a different name and with "unknown" members of their organisation. This appears to be an attempt to avoid perceived scrutiny from us during an assessment.

For now, I do not think any action is required from the registration team as we are not in receipt of any relevant applications.

Louise[redacted] – happy to discuss further if you would like but I think the note contains most of the relevant points.

[redacted] – Two quick questions, I can see that there is a transcript in the YouTube video – is there a way to download this? And can I ask that your team keep an eye out for any relevant information relating to [redacted] and Homeland? The video notes that they have a domain name set up and it sounds like they intend to move quite quickly so it would be useful if any news around them that appears could be picked up.

Cheers,

[redacted]

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**From:** Partyreg
**Sent:** 02 May 2023 6:09 PM
**To:** [redacted]
**Subject:** [redacted] - Patriotic Alternative CCM:0288374

Dear [redacted]

Thank you for providing this information.

We are not currently in receipt of an application for Patriotic Alternative. Where Patriotic Alternative are not currently registered with us, they do not fall within our regulatory regime and as such rules around donations and recording of funds do not apply. Where that is the case, we cannot take any action relating to this information at this time.

If we receive any relevant applications in the future, then we will consider this information as part of our formal assessment process.

When applications are received, we publish them for public comment on our website. You are welcome to subscribe to notifications for updates to this page which happen weekly and comment on any applications that we receive.

If you wish to discuss this matter further, please feel free to contact us via this email address.

Kind regards,

[redacted]

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**From:** [redacted]
**Sent:** 22 April 2023 8:37 AM
**To:** Public Info <info@electoralcommission.org.uk>; Public Info <info@electoralcommission.org.uk>
**Subject:** other

Submitted on 22 April 2023

Submitted values are:

## Name

**First name**
[redacted]

**Last name**
[redacted]

**Your email**
[redacted]

**Your region/country**

[redacted]

**I am...**
a member of the public

**What are you contacting us about?**
other

**Your question**
There is an audio recording with regards to two political organisations which I think the EC need to listen. They refer to Patriotic Alternative who have had their application rejected multiple times. The recording is made by the former admin officer, [redacted] and has been posted on a former PA members YouTube channel - [redacted] was essentially third in command of PA. In it makes claims how PA had multiple bank accounts and even one [redacted] set up himself PA payments yet it seems the EC were only told about one.

Also, talks about "hiding" donations, couldn't quite pick up what was meant by that, but I think it refers to how donations from the web page, then encrypted. I couldn't follow it.

[redacted] has formed his own group, Homeland, and they have or applied to be political party but in the recording he states that it will be done by 2/3 people who are unknown to the EC, i.e. not appeared in numerous newspaper headlines for being involved in the far right such as [redacted] -

Background to the split -
https://www.searchlightmagazine.com/2023/04/breaking-news-patriotic-alternative-split/

Link to audio on a Youtube channel (it has been leaked in numerous other locations)

https://www.youtube.com/watch?v=RB6P8bv29TA