From: FOI
Sent: 16 September 2025 16:21
To: [redacted]
Subject: FOI 056-25 - Response

Dear [redacted]

Our Ref: FOI 056-25

Thank you for your email to the Electoral Commission dated 21 May 2025.

The Commission aims to respond to requests for information promptly and regrets it has not done so within the statutory timeframe of twenty working days. We apologise for this delay.

Your request is in bold below followed by our response.

You have asked for the following information:

"Please provide the following records:
• All correspondence by Reform UK (and/or its representatives) and the Electoral Commission between September 1, 2024 and May 21 2025 in relation to its constitution and proposals for a new constitution.
• Minutes and dates of any meetings concerning the above"*.*

Our response is as follows:

We have understood your request to include all correspondence from Reform UK, and all correspondence from the Electoral Commission relating to the party's updated constitution; including any internal correspondence within the Electoral Commission about the party's constitution, and relevant external correspondence between the Electoral Commission and third parties.

We hold the information you have requested and have disclosed some of it in our response.

To access these documents, 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 your information. Please find below details on how to access the specific area we have set up for your documents.

1. Click on the link in the email.
2. You will be prompted to set up your username and password. Your username will be your email address, and your password can be whatever you like.
3. With your username and password, enter both details at the login screen and click 'login'.
4. You will now see your personal page, which will show the Share '**FOI 056-25**'.
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 **16 October 2025**.

The Commission has determined that some of the information within the scope of this request is exempt from disclosure under sections 36 and 42 of the Freedom of Information Act 2000 (FOIA). Information classified as personal data is also exempt from disclosure under section 40 of the FOI Act.

Exemption: section 36(2)(b)(i)-(ii), section 36(2)(c)

Information that you have requested is exempt from disclosure under s.36(2)(b)(i) and (ii), and s.36(2)(c) of FOIA.

Section 36(2)(b) exempts from disclosure information, which in the reasonable opinion of a qualified person, would, or would be likely to, inhibit

1. the free and frank provision of advice, and/or
2. the free and frank exchange of views for the purposes of deliberation.

Section 36(2)(c) exempts from disclosure information, which in the reasonable opinion of a qualified person, would otherwise prejudice, or would be likely otherwise to prejudice, the effective conduct of public affairs.

The qualified person (s.36(5)(o) FOIA) at the Electoral Commission is of the opinion that releasing the requested information would, or would be likely to, inhibit the free and frank provision of advice and the free and frank exchange of views, and it would otherwise prejudice, or would be likely otherwise to prejudice, the effective conduct of public affairs.

Public interest test

Section 36 is a qualified exemption which means that we must consider whether the public interest in applying the exemption outweighs the public interest in disclosure. There are a number of factors that are weighed in the balance to consider whether the public interest in applying the exemption outweighs the public interest in disclosure. The factors that we have considered are laid out below.

Public interest in favour of disclosure

The Commission recognises that there is a public interest in transparency and accountability for decisions made by a public body, and in understanding the reasons for the decision taken, including those based on the opinions and advice of internal officers.

Disclosure would improve public understanding and increase public trust in how the Commission makes fully informed, reasoned decisions, including its provision of advice and guidance.

Public interest against disclosure

Disclosure risks inhibiting free and frank exchange of views for the purpose of deliberations between Commission officers. Exchange of views internally is essential to the Commission's complex regulatory decision making.

The information contains deliberations about the requirements relating to political party governance documents and includes internal debates between Commission officers as they consider the proper application of those requirements. Commission officers need to be able to

deliberate without fear that discussions will be taken out of context and reported. Release of the information would compromise the ability of Commission officers to engage in free and frank deliberations on party registration matters.

Disclosure risks inhibiting free and frank exchange of views between Commission officers and political parties, and the provision of advice to those parties. Political parties need to be able to seek advice and Commission officers need to be able to provide advice without being inhibited by the concern that information could be taken out of context when released into the public domain. Disclosure could have a chilling effect where parties are dissuaded from seeking advice from the Commission. While releasing external correspondence with the applicant party may provide transparency on how it is governed and operated, doing so risks inhibiting free and frank exchange of views with the party in question and the provision of advice to them.

Release of this information would indicate to parties, and other regulated stakeholders, that they cannot reasonably expect that any draft documentation, or exchange of views, would not be disclosed. This, in turn, would inhibit external stakeholders from engaging with the Commission in a free and frank manner at an early stage, and reduce the effectiveness with which the Commission fulfils its legal duty to give advice and assistance to regulated entities.

The Commission must not prejudice its ability, or the ability of other public bodies to conduct their statutory functions effectively. Disclosure of the requested information would, or would be likely to, inhibit the ability of the Commission to engage in free and frank discussions and provide advice on complex and novel areas and otherwise prejudice its ability to effectively carry out its statutory functions effectively.

Conclusion

Following due consideration of the above, the qualified person is of the opinion that disclosure of the information would, or would be likely to, inhibit both the free and frank provision of advice, and the free and frank exchange of views for the purposes of deliberation. In addition, disclosure of the information would otherwise prejudice the effective conduct of public affairs.

It is also noted that the transparency gained by publishing correspondence with parties is less than the publication of the constitutional documents themselves. In this case, the constitution itself that is the subject of this FOI request is in the public domain on the party's website. The actual governance arrangements of Reform UK are not, therefore, concealed from the public by the application of the s.36 exemption.

We therefore judge the public interest in withholding the information to outweigh the public interest in disclosing the information.

Exemption: section 42(1) - legal professional privilege

Section 42(1) 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

Application of the section 42(1) exemption is subject to the public interest test. There are a number of factors that must be weighed in balancing 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

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 high quality and comprehensive legal advice is part of that accountability. There is a legitimate public interest in the transparency of our registration process. 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 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. Taking robust and legally sound decisions is in the public interest, and in some cases, this is reliant on the ability of the Electoral Commission to obtain confidential legal advice. The concept of non-disclosure of Legal Professional Privilege 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, disclosure of the material is not necessary in order to understand the outcome of the constitution registration process.

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 have determined, a strong and overriding public interest in maintaining the principle of legal professional privilege.

Exemption: Section 40(2) - Personal Data

You will notice that certain personal details have been redacted from the documents we are releasing. Section 40(2) 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.

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 Team
FOI@electoralcommission.org.uk

The Electoral Commission
www.electoralcommission.org.uk

From: Party Reg
To: "[redacted]"
Subject: 2025-01-07 [redacted] - Reform UK query
Date: 07 January 2025 15:50:21

Dear [redacted],

Thanks for your query.

When applying to register, a party must provide us with a copy of its constitution for assessment in which its structure must be outlined.

We have previously published the registered constitution of Reform UK through a previous FOI request on 11 November 2021, reference FOI 125-21. You can find this FOI here.
This remains the most up-to-date copy of the document that we hold.

The Commission is in discussion with Reform UK about updating its constitution and will ensure that any document submitted to us is consistent with the law, as per our statutory duties.

I hope this satisfies your query.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]
Sent: 07 January 2025 2:36 PM
To: Public Info <info@electoralcommission.org.uk>; Public Info <info@electoralcommission.org.uk>
Subject: other

Submitted on 7 January 2025

Submitted values are:

Name

First name
[redacted]

Last name
[redacted]

Your email
[redacted]

Your telephone number
[redacted]

Your postcode
[redacted]

Your region/country
[redacted]

I am...
a member of the public

What are you contacting us about?
other

Your question
I was wondering if you have a copy of Reform UK's governance structure as I believe they would needed to have provided this as part of their application to become a political party and if this available to the public. Thank you. [redacted]

From: Party Reg
To: [redacted]
Subject: 2025-01-22 [redacted] - Reform UK query
Date: 29 January 2025 16:05:45

Dear [redacted]

Thank you for your query.

When applying to register, a party must provide us with a copy of its constitution for assessment in which its structure must be outlined, as well as a financial scheme which must have been adopted.

Once registered, parties are required to maintain these documents as necessary, and should a party update its constitution in any given year, it must provide the Commission with an updated constitution as part of its next annual renewal/confirmation of details. We do not publish these documents.

We have previously published the currently-registered constitution of Reform UK through a previous FOI request on 11 November 2021, reference FOI 125-21. You can find this FOI here.

We can confirm that Reform UK submitted an updated constitution to the Commission in January 2025 which we are currently considering, alongside its renewal notification,.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]
Sent: 22 January 2025 2:52 AM
To: Public Info <info@electoralcommission.org.uk>; Public Info <info@electoralcommission.org.uk>
Subject: other

Submitted on 22 January 2025

Submitted values are:

Name

First name
[redacted]

Last name
[redacted]

Your email
[redacted]

Your postcode
[redacted]

Your region/country
[redacted]

I am...
a member of the public

What are you contacting us about?
other

Your question
Hello there

I appreciate that a party must register with you and also, once they have taken part in an election, must sharing financial documents also.

What other obligations to a political party have and are these other documents available on your website available to all in the public domain too?

I'm specifically interested in the constitution of the Reform UK party. If it has not yet been submitted, please could you inform me when it is available?

Many thanks for the work you do in keeping our democracy functioning,

Kindest regards

[redacted]

[redacted]

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: Briefing note - Reform UK current registration requirements
Date: 26 September 2024 12:01:36
Attachments: Briefing note FAO Reg Support - Reform UK current Registration Team reqs.docx

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Hi [redacted]

Please see attached.

Hopefully this outlines Reform UK's current registration requirements regarding their updated constitution and new nominating officer. Both have an impact on the party's next renewal but that deadline is 31 January 2025, so no immediate danger and not something I'm anticipating being an issue given their recent communication over both things.

As said over Webex, Registration will take a separate lead on the nominating officer change where there is the 14-day deadline, and we'll let you know if that has been resolved before any meeting you have with them.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

The Electoral Commission

Subject: Ongoing Registration requirements of Reform UK

FAO: Regulatory Support ahead of meeting with Reform UK

Briefing note:

1. **Updated party constitution**

As per numerous news reports and the party's own social media accounts, Reform UK's proposed updated constitution was ratified by party members at the recent party conference held from 20-21 September 2024. The party have since added a document to their website which can be viewed here and is different to the constitution held by the Commission, approved in 2021.

From a registration perspective, where we are made aware of a party updating their constitution, and in this instance we can be satisfied that threshold has clearly been met, it becomes a statutory requirement that this updated document be submitted alongside the party's annual renewal.

In short, Reform UK's next renewal will not be treated as compliant, unless it is submitted alongside, or we have already been in receipt of, an updated constitution.

As such, in any conversation regarding their updated constitution, it must be made clear to the party that there is a tangible impact on the party's registration status, should they fail to submit one.

For reference, the party's next renewal deadline is **31 January 2025**.

It should also be noted that, the party's renewal is not contingent on the constitution being deemed compliant, just that it be submitted alongside. If the eventual document is deemed to not be PPERA-compliant, the party's renewal will still have been pushed back another year.

2. **New nominating officer**

The party have recently changed nominating officer from [redacted] to Pete Durnell who was introduced to [redacted] at the party conference as 'our new nominating officer'.

Where Pete has taken over the role, this begins the 14-day period within which the party must inform the Commission of a change.

Party registration will be in contact separately with treasurer [redacted] (whose duty it is to inform us), but we will not be able to accept any submitted renewal as compliant before that change has been processed.

From: [redacted]
To: [redacted]
Subject: Fw: Meeting request
Date: 25 September 2024 14:07:57

Just a heads up.

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]
Sent: 25 September 2024 2:05 PM
To: [redacted]
Cc: [redacted] Party Secretary
[redacted]
Subject: Meeting request

Dear [redacted]

I'd like to introduce myself as the new COO of Reform UK. Having recently hosted [redacted] and [redacted] at the Reform conference I was hoping to meet you in person. We'd also very much like to discuss how we can work with the Electoral Commission to change our constitution.

Would you be available on Tuesday or Wednesday next week with me, [redacted] and [redacted] Very happy to come to your offices.

Best,

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

From: [redacted]
To:
Subject: FW: Reform UK - Receipt of renewal and updated constitution
Date: 20 February 2025 12:58:07

From: Party Reg
Sent: 30 January 2025 4:58 PM
To: [redacted]
Cc: [redacted]
Subject: Reform UK - Receipt of renewal and updated constitution

Dear [redacted]

Thank you for delivering the party's confirmation of registered details, which was received on 20 January 2025 and considered complete and compliant with the Political Parties, Elections and Referendums Act 2000 (PPERA) on 20 January 2025.

Owing to limitations of our online system, this confirmation will be processed as soon as we have a decision on your submitted Constitution. However, pleased be assured that your party's renewal has been considered compliant, and will your party therefore stay on the register even if it doesn't appear as 'processed' on our PEF Online system.

The party's next confirmation of registered details is due to be delivered by 07 January 2026. Should the party change its financial year end, or its total income or expenditure exceeds £250,000 in a financial year, then this deadline will change.

As the treasurer you are responsible in law for confirming your party's details are correct by the deadline each year. We suggest strongly that you set yourself a reminder to ensure you meet this deadline.

Constitution

We have also received your updated constitution. We will now consider it against the requirements of the Political Parties, Elections and Referendums Act 2000 (PPERA).

PPERA sets out that a constitution is the document or documents (of whatever name) by which the structure and organisation of the party is determined. Where the party is also registered as a company, we would expect the Memorandum and Articles of Association to form part of the constitution documents.

The constitution has also mentioned a party rulebook. Though it states that if any rules made in the rulebook that is repugnant to that of the constitution, the constitution would prevail, it may be usual if we had a copy of the rulebook in conjunction with the constitution for our assessment.

Could you please provide us with copies of these documents? We can then

consider how the documents interact with your requirements under electoral law, and provide relevant advice and guidance.

Additionally, I note in your last email to the Commission you stated that you did not yet have your new company number. If you could provide this new number when you receive it, that would be greatly appreciated.

Changes throughout the year

Throughout the year, you must also notify us if your party's registered details become incorrect. You must notify us **within 14 days** of changes to the named leader, treasurer, nominating officer, and campaigns officer or additional officer (if applicable) for the party if caused by the death or termination of the appointment of that officer. For other changes, such as changes to officer home addresses or the party's headquarters address, you must notify us **within 28 days**. Failing to update the party's registered details where they are not correct by the relevant deadline is a contravention of PPERA which may result in a fine. You can read our Enforcement Policy here.

Failing to update the party's registered details where they are not correct by the relevant deadline is a contravention of PPERA which may result in a fine. The required forms for changing your party's registered details are available in the resources section of our guidance on maintaining party details.

If you need more information view our guidance on registering and maintaining a party or contact us using the details below.

Yours sincerely,

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
To:
Subject: RE: Reform UK constitution
Date: 13 November 2024 12:45:50

Thanks [redacted] that's what I was looking for.

[redacted]

From: [redacted]
Sent: 13 November 2024 12:31 PM
To: [redacted]
Subject: RE: Reform UK constitution

Hi [redacted],

I'd rather we didn't get into the ins and outs of ongoing changes for other parties, in much the same way as the SNP wouldn't expect us to discuss their dealings with Reform.

That said, I'm happy for us to state some facts:

- We are aware that Reform UK voted to update their constitution at their recent conference
- If a registered party makes changes to their constitution, they are required to provide us with update before or alongside their annual renewal
- We have been in contact with Reform on this matter

For background info for [redacted] and Jackie, Reform's next renewal deadline is 31 January 2025, and we haven't yet received an update.

Hope that's helpful enough, give me a shout if there's anything else I can help with.

Cheers,

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 13 November 2024 11:19 AM
To: [redacted]
[redacted] UK constitution

Hi [redacted]

[redacted] and Jackie are meeting with SNP MSP Michelle Thomson on Monday after she requested a discussion following recent correspondence we've had with her (attached). [redacted] mentioned there have been recent discussions with Reform UK about them updating their constitution. Is there any information you can share with me for [redacted] Jackie to mention at the meeting?

Thanks

[redacted]

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

Press office: 0131 225 0211
Press out of hours: 07789 920414

From: [redacted]
To: Niki Nixon; [redacted] Jackie Killeen
Cc: Laura Douglas; Hannah Brown; Claire Robbie
Subject: RE: [redacted] Reform UK
Date: 15 January 2025 17:22:07

Thanks both – I'll send this and the other answers.

Cheers
[redacted]

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: Niki Nixon [redacted]
Sent: 15 January 2025 5:20 PM
To: [redacted]; Jackie Killeen
[redacted]
Cc: Laura Douglas [redacted] Hannah Brown
[redacted] Claire Robbie [redacted]
Subject: RE: [redacted] - Reform UK

Thank you, that works

From: [redacted]
Sent: 15 January 2025 5:13 PM
To: Niki Nixon [redacted] Jackie Killeen
[redacted]
Cc: Laura Douglas [redacted]; Hannah Brown
[redacted] Claire Robbie [redacted]
Subject: RE: [redacted] - Reform UK

Hi Niki,

I've provided some context to how we work with parties following our chat just now.

Hopefully a bit more softened. The question isn't really about the deregistration process so I'm content to focus on the constitution aspect. Hope that works for you.

The Commission engages with parties throughout the year, and ahead of relevant deadlines, to support them in maintaining their details and registration. We are in

active discussion with Reform UK about submission of their updated constitution. It is the responsibility of the party to submit an updated constitution for the purposes of meeting their requirements to remain registered.

In order to remain registered, every year a party must confirm that its registered details are correct, including submitting updates to its constitution, and pay a £25 fee. This is called the annual confirmation of registered details. Reform's next annual confirmation of registered details is due by 31 January.

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: Niki Nixon [redacted]
Sent: 15 January 2025 4:04 PM
To: Jackie Killeen [redacted]
Cc: Laura Douglas [redacted] Hannah Brown [redacted] Claire Robbie [redacted]
Subject: RE: [redacted] Reform UK

I'm in between meetings, so haven't had a chance to review this properly, but could we change the answer to that first question to soften it. It reads as a little antagonistic. I imagine we're not going to simply deregister Reform.

From: Jackie Killeen [redacted]
Sent: 15 January 2025 3:07 PM
To: [redacted] Niki Nixon [redacted]
Cc: Laura Douglas [redacted] Hannah Brown [redacted]; Claire Robbie [redacted]
Subject: RE: [redacted] - Reform UK

Hi [redacted]

In a work shop but at quick glance these look fine to me.

Jackie

From: [redacted]
Sent: 15 January 2025 2:26 PM
To: [redacted] Jackie Killeen [redacted] Niki Nixon [redacted]

Cc: Laura Douglas [redacted] Hannah Brown [redacted] Claire Robbie [redacted]
Subject: RE: [redacted] Reform UK
Importance: High

Thanks [redacted]

Hi Niki, Jackie, just looping you into this chain because the BBC came back to our previous answers last week about Reform updating its constitution. They are asking more questions about how Reform are registered as a party and also as a company (please see below).

I also wanted to check you're both happy with these responses since it's getting quite a bit of media interest. The journalist asked if we could get back to them by 3pm, but can be a little later if need be!

Thanks
[redacted]

//

What happens if Reform do not change their constitution with the electoral commission before 31 January?

If a party does not meet the requirements for renewing its registration, it would be deregistered, and then appear on the register of deregistered parties on our website.

What would the process be of closing down Reform UK Ltd if it is registered with the electoral commission? How long would that take?

Reform UK is registered as a political party with the Electoral Commission. Any company structure changes, from a regulatory perspective, would be a matter for Companies House and not the Electoral Commission. If a party's company arrangements are reflected in party documents such as a constitution and financial scheme, we would expect these documents to be updated to reflect any changes.

There is no specific timeframe for this, outside of the requirement for a party to submit any constitution changes to the Commission ahead of their next annual renewal deadline.

Could a Reform UK Ltd and a Reform UK CLG both be registered with the electoral commission?

Reform UK is registered as a political party with the Electoral Commission. A political party may choose to also be registered as a company, and this may inform internal party structures. Any company registration would be completed through Companies House. Any application to register a new political party would

be considered against the legal requirements.

What if they had the same leadership and office holders? What if they had different office holders?

A registered political party must have at least two individuals fulfilling the roles of leader, treasurer and nominating officer. There is no restriction on an individual being a registered officer of more than one party.

[redacted])

[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 15 January 2025 2:11 PM
To: [redacted]
Cc: Laura Douglas [redacted] Hannah Brown [redacted] Claire Robbie [redacted]
Subject: RE: [redacted] - Reform UK

Hi [redacted]

I've made some suggested changes to the questions below. It does seem like we're getting quite bogged down in questions about registering companies with us, which is not what is happening here. Hopefully the answer I've put together for the second question clarifies that a bit.

What happens if Reform do not change their constitution with the electoral commission before 31 January?

If a party does not meet the requirements for renewing its registration, it would be deregistered, and then appear on the register of deregistered parties on our website.

What would the process be of closing down Reform UK Ltd if it is registered with the electoral commission? How long would tat take?

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scheme, we would expect these documents to be updated to reflect any changes.

There is no specific timeframe for this, outside of the requirement for a party to submit any constitution changes to the Commission ahead of their next annual renewal deadline.

Could a Reform UK Ltd and a Reform UK CLG both be registered with the electoral commission?

Reform UK is registered as a political party with the Electoral Commission. A political party may choose to also be registered as a company, and this may inform internal party structures. Any company registration would be completed through Companies House. Any application to register a new political party would be considered against the legal requirements.

What if they had the same leadership and office holders? What if they had different office holders?

A registered political party must have at least two individuals fulfilling the roles of leader, treasurer and nominating officer. There is no restriction on an individual being a registered officer of more than one party.

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 07 January 2025 5:10 PM
To: Jackie Killeen [redacted] Niki Nixon [redacted] Laura Douglas [redacted] Hannah Brown [redacted] Claire Robbie [redacted]
Cc: Orla Hennessy [redacted]
Subject: RE: [redacted] - Reform UK

Hi all,

Niki's change wasn't accurate in all cases, and that sentence is covering the general rules on constitution updates. I've made a further tweak to bring the point in line with how the law is actually written.

Hopefully uncontroversial from me!

The Commission is in discussion with Reform UK about updating its constitution. We have not yet received an updated constitution from the party since its conference in September 2024. By law, a party must submit any changes to its constitution by the deadline of its next annual renewal confirmation. For Reform, this means the changes must be submitted by 31 January 2025.

Parties may also be subject to other laws, such as company law, and have structures in place to meet these requirements. Any company structure changes, from a regulatory perspective, would be a matter for Companies House and not the Electoral Commission.

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: Jackie Killeen [redacted]
Sent: 07 January 2025 5:07 PM
To: Niki Nixon [redacted] Laura Douglas [redacted] Hannah Brown [redacted] Claire Robbie [redacted]
Cc: Orla Hennessy [redacted]
Subject: Re: [redacted] - Reform UK

Hi [redacted]
This looks fine to me, I know Hannah and others have also seen.

Jackie

Sent from Outlook for iOS

From: Niki Nixon [redacted]
Sent: Tuesday, January 7, 2025 4:55:45 PM
To: [redacted] Douglas [redacted] Hannah Brown [redacted] Claire Robbie [redacted] Jackie Killeen [redacted]
Cc: Orla Hennessy [redacted]
Subject: RE: [redacted] - Reform UK

Thanks [redacted] the information about the deadlines was quite complicated. I've

simplified below, but do check this is still accurate.

Thanks, Niki

From: [redacted]
Sent: 07 January 2025 3:57 PM
To: Laura Douglas [redacted] Hannah Brown [redacted] Claire Robbie [redacted] Niki Nixon [redacted] Jackie Killeen [redacted]
Cc: Orla Hennessy [redacted]
Subject: RE: [redacted] - Reform UK

Thanks Laura!

Hi Niki, Jackie – just looping you in because we've had queries from the BBC and the Guardian about Reform UK proposing to change its constitution and if they are in contact with us about it. This has been getting some attention in the media, so I wanted to check if you both were happy with the below response? They have given us a deadline of EOD to respond.

Thanks
[redacted]

//

The Commission is in discussion with Reform UK about updating its constitution. We have not yet received an updated constitution from the party since its conference in September 2024. By law, a party must submit any changes to its constitution within six months of its annual accounts submission deadline. For Reform, this means the changes must be submitted by 31 January 2025.

Parties may also be subject to other laws, such as company law, and have structures in place to meet these requirements. Any company structure changes, from a regulatory perspective, would be a matter for Companies House and not the Electoral Commission.

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: Laura Douglas [redacted]
Sent: 07 January 2025 3:21 PM
To: [redacted] Hannah Brown [redacted] Claire Robbie [redacted]

Subject: RE: [redacted] - Reform UK

Hi thanks for sharing.

A few insertions in purple. One to make clear this is what all parties have to do, and the other as I think we need to be explicit about the deadline date so have inserted this in.

Also removed 'likely' from second paragraph.

Hope helpful.

Laura

Laura Douglas (she/her)
Head of Regulatory Support

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 07 January 2025 2:40 PM
To: Hannah Brown [redacted]; Claire Robbie [redacted] Laura Douglas [redacted]
Subject: RE: [redacted] - Reform UK

Thanks [redacted] and Hannah! We've also had a query from the [redacted] below which I think is in relation to this query. Their deadline is EOD today.

I've also just added a line in red about the deadline because we were asked about it last time.

Thanks
[redacted]

//

From the [redacted]
Can I check if you have received any application from Reform UK and/or Nigel Farage in relation to the Electoral Commission giving a green light to the reclassification of Reform UK?

Mr Farage has said today that paperwork was filed in early December with the Electoral commission.

Can I ask if that is the case and, if so, what is was the nature of the application?

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: Hannah Brown [redacted]
Sent: 07 January 2025 2:15 PM
To: Claire Robbie [redacted]; Laura Douglas [redacted]
Cc: [redacted]
Subject: RE: [redacted] - Reform UK

Hi - CC'ing both Heads on this for obvious reasons where Reform is mentioned.

I think the answer to the question here prepared by [redacted] is correct, but wondered if you wanted to finesse this to make sure we have joined up oversight of anything that references relationship with Reform and the Commission.

Hannah Brown
Head of Registration, Compliance and Transparency

The Electoral Commission
[redacted]

electoralcommission.org.uk

From: [redacted]
Sent: 07 January 2025 1:47 PM
To: [redacted]
Cc: Hannah Brown [redacted]
Subject: RE: [redacted] - Reform UK

Hi [redacted]

I've pulled together some lines below, largely based off what was said in a response to an FT request in December. I think we stay top line and avoid getting into discussion about the individual accusations from members. I've also added in some background info.

Copying in Hannah so she's aware there's continuing public interest in the matter. Hannah – if you do have any comment on the lines below could you let me know by COP today? Then we can get finalised lines to [redacted] by tomorrow morning latest.

STARTS

The Commission is in discussion with Reform UK about updating its constitution. We

have not yet received an updated constitution from the party since their conference in September 2024. Under the Political Parties, Elections and Referendums Act 2000 (PPERA), if a party has updated its constitution, it must submit constitution updates to the Commission by the time of its next annual renewal confirmation, which for all parties is six months after its deadline for submission of annual accounts. Reform has to submit it's documentation to the Commission by 31 January 2025.

Parties may also be subject to other laws, such as company law, and have structures in place to meet these requirements. Any company structure changes, from a regulatory perspective, would ~~likely~~ be a matter for Companies House and not the Electoral Commission.

ENDS

Notes for info:

1. Constitution updates do not fall under our statutory decision making in the same way in which party applications to register names, descriptions and emblems do. Constitution updates are not published for public comment as part of our considerations, and do not appear on our record of published decisions.
2. Every party must confirm their details registered details are up to date, and pay a £25 fee each year, to renew their registration. A party's renewal is due six months after its deadline for submission of annual accounts.

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 07 January 2025 12:13 PM
To: [redacted]
Subject: FW: [redacted] request - Reform UK

H[redacted]—

We've just had a query from the BBC about Reform's constitution, and if we have any comments about if they're working with us to dissolve their LLC status. I was wondering if we can say if they've contacted us about this?

I've just pulled out some previous lines below in case helpful, but I will tweak depending on the above.

Thanks!
[redacted]

//

Under electoral law, a party must provide a constitution that sets out the structure and organisation of the party, and we have published guidance for parties on the topics we expect a constitution to include. It is ultimately for a party to choose how to structure itself, so long as it still complies with the relevant legislation. Parties may also change their structure and update their constitution after registration.

The law does not prevent a party from also being a company. Where the law does not specify the rights of party members, this is therefore a matter for the party to determine. Parties may also be subject to other laws, such as company law, and have structures in place to meet these requirements. Our remit within this is to consider how any structures affect the ability of a party to meet the requirements under electoral law.

Regarding parties following their own constitutions, the Commission's role extends so far as to determine whether the structure set out in any document is consistent with electoral law and allows the party to comply with various statutory requirements at time of registration. Any concerns as to whether a party's constitution is being followed is a matter to raise with the party themselves.

The Electoral Commission's remit extends to assessing party applications against the statutory tests set out in the relevant law. Any changes to the law and to the Commission's remit are a matter for Parliament.

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 07 January 2025 12:03 PM
To: Press <press@electoralcommission.org.uk>
Subject: [redacted] - Reform UK

Good morning,

Reform UK claimed to be working with the Electoral Commission to dissolve their LLC status and establish a CLG with the commission - after voting on constitutional changes in September (https://www.bbc.co.uk/news/articles/c0r8q99vx1ko).

Do you have any comment? Or are you able to comment?

No applications have appeared on the Electoral Commissions website so far https://www.electoralcommission.org.uk/political-registration-and-regulation/political-party-registration/view-current-applications

I'm looking to publish a story on the delay in changing the party, following accusations by

members that the vote was “all smoke and mirrors” and the party has no plans to democratise, despite its public claims. The story is due to go out on the BBC News website later this week.

There is obviously huge public interest in this story, not least to the members who may wrongly believe they now have a say in the leadership and direction of the party.

Any help you could give, on or off-the-record to ensure my article is as accurate as possible would be greatly appreciated.

I’m on [redacted] if you’d like to discuss over the phone.

Best,
[redacted]

From: [redacted]
To: [redacted]
Subject: RE: DRAFT FOR APPROVAL - Reform UK updated constitution and new nominating officer
Date: 26 September 2024 10:42:55

Hi [redacted],

Please don't send this out, we are working on managing the relationship in Reg Support and there is a background to this invitation.

I will let you know whether we need your attendance, it is unlikely and also not that likely that we will discuss the constitution in the meeting.

[redacted]

From: [redacted]
Sent: 26 September 2024 10:24 AM
To: [redacted]
[redacted]
Subject: DRAFT FOR APPROVAL - Reform UK updated constitution and new nominating officer

Hi both – see below and suggest edits/approve as appropriate.

[redacted]et me know how involved you want to be in any conversations regarding updating the party's constitution – [redacted] is on leave next week and I'll be taking a lead on any eventual submission, but let me know how hands on/off you'd like to be. [redacted] and I are personally unconvinced how useful an in-person meeting will be, given how limited we are in advising on a constitution's acceptability outside of a full assessment. Welcome your thoughts, however.

STARTS

Hi [redacted]

Thanks for getting in contact.

By way of introduction, I'm [redacted] from the Commission's Registration team which carry out the assessments on party constitutions and will be taking a lead on any submission from yourselves.
As per various news reports, we're aware that Reform UK ratified a new constitution at their party conference last weekend, which we presume has sparked this conversation.

While we are happy to facilitate a meeting with yourselves, it would be great to get some clarity on precisely what you want to discuss.

If you're seeking clarity over the actual process of submitting an updated constitution to us for assessment, this is something I'd be happy to walk you through over the phone/via email.
If you're looking to discuss the particulars of an updated constitution, please be aware that we will be unable to provide any guarantees of acceptability in any

meeting, as a constitution's overall acceptability can only be determined as part of a full assessment.

We are happy to review any document you want to send our way and highlight any glaring issues or discrepancies you may wish to address ahead of a formal assessment, but please appreciate that it is only through said formal assessment that the document's overall acceptability can be determined.

New nominating officer

While not the initial subject of your email, we thought it would be helpful to highlight the party's responsibilities when it comes to informing the Commission of any change to its registered officers.

My colleague [redacted] was introduced to your new nominating officer, Pete Durnell, at your party conference last weekend, and by way of a reminder, party's have a duty to inform the Commision of any change in registered officers within 14 days of said changes occurring.
Mehrtash, as party treasurer, can initiate this process through our online portal, or alternatively I have attached the relevant RP4 form to this email should you prefer a paper approach. Please note that all officers, including the Alan Graves as the outgoing nominating officer, will need to be involved in this officer change for it to be considered properly authorised.

I look forward to hearing back from you, and if you have any questions about any of the above, please don't hesitate to get in touch.

ENDS

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

Cc: Press <press@electoralcommission.org.uk>
Subject: [redacted]

Hi [redacted] d team,

I hope you're keeping well.

In light of the above email exchange we had last month, I'm wondering if you can tell me whether the Electoral Commission has received an updated constitution from Reform UK ahead of the party's annual renewal confirmation on January 31?

I look forward to hearing from you.

Best wishes,
[redacted]

On Wed, 11 Dec 2024 at 14:29, [redacted] > wrote:

> Great, thanks for that [redacted]
>
> On Wed, 11 Dec 2024 at 14:22, [redacted] wrote:
>
> > Hi [redacted]
> >
> > No worries. It will be 31 January 2025.
> >
> > Best,
> > [redacted]
> >
> > [redacted]
> >
> > **The Electoral Commission**
> > electoralcommission.org.uk
> >
> > **From:** [redacted]
> > **Sent:** 11 December 2024 11:33 AM
> > **To:** [redacted]
> > **Cc:** Press <press@electoralcommission.org.uk>
> > **Subject:** Re: [redacted]
> >
> > That is helpful, thanks a lot [redacted]

When is Reform UK's next annual renewal confirmation due?

[redacted]

On Wed, 11 Dec 2024 at 10:42, [redacted] > wrote:

> Hi [redacted],
>
> The Commission is in discussion with Reform UK about updating its constitution. We have not received an updated constitution from the party since their recent conference. Under the Political Parties, Elections and Referendums Act 2000 (PPERA), if a party has updated its constitution, it must submit constitution updates to the Commission by the time of its next annual renewal confirmation.
>
> Parties may also be subject to other laws, such as company law, and have structures in place to meet these requirements. Regarding a change from a private limited company to a company limited by liability, this is a matter for Companies House and not the Electoral Commission.
>
> Also just for your information – constitution updates do not fall under our statutory decision making in the same way in which party applications to register names, descriptions and emblems do. Constitution updates are not published for public comment as part of our considerations, and do not appear on our record of published decisions.
>
> Hope this helps,
> [redacted]
>
> [redacted]
>
> **The Electoral Commission**
> electoralcommission.org.uk
>
> ---
>
> **From:** [redacted]
> **Sent:** 10 December 2024 4:45 PM
> **To:** [redacted]
> **Subject:** [redacted]
>
> Hi [redacted]
>
> I wonder if you can help me with something.
>
> You may remember that in September Nigel Farage said that he was going to give up ownership of Reform UK and put forward a new constitution.

As far as I can see, the party structure has not changed at all: Farage is still the person for with significant control: https://find-and-update.company-information.service.gov.uk/company/11694875/officers

Meanwhile, I can't see any evidence of Reform having applied to change its constitution: https://www.electoralcommission.org.uk/political-registration-and-regulation/political-party-registration/view-current-applications

***

Can you let me know whether Reform UK has submitted any documentation to the Electoral Commission to change its constitution?

And have you seen or received any evidence that the party is in the process of changing from a private limited company to a company limited by liability?

I would be grateful if you could get back to me on this today if possible. If not, tomorrow morning would be fine.

Best wishes,

--

[redacted]

[redacted]

[redacted]

[redacted]

From: Party Reg
To: [redacted]
Subject: [redacted]t
Date: 11 December 2024 10:08:16
Attachments: image001.jpg

Morning,

How are you with the following:

STARTS

The Commission is in discussion with Reform UK about updating its constitution and will ensure that any document submitted to us is consistent with the law, as per our statutory duties. Under the Political Parties, Elections and Referendums Act 2000 (PPERA), a party must provide a constitution that sets out the structure and organisation of the party, and we have published guidance for parties on the topics we expect a constitution to include. The Commission's role extends so far as to determine whether the structure set out in any document is consistent with electoral law and allows the party to comply with various statutory requirements.

Parties may also be subject to other laws, such as company law, and have structures in place to meet these requirements. Our remit within this is to consider how any structures affect the ability of a party to meet the requirements under electoral law.
Regarding the party's change from a private limited company to a company limited by liability, from a regulatory perspective, this is a matter for Companies House and not the Electoral Commission.

ENDS

This cribs off the last press query we had about Reform's constitution for consistency, but let me know what you think.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]
Sent: 11 December 2024 9:26 AM
To: Party Reg <Partyreg@electoralcommission.org.uk>
Cc: [redacted]

Hi all,

We've received a press query from the FT about Reform UK and if they have updated their constitution yet after saying they would. Just checking if we've received anything about this that I can say? Sorry for the tight turnaround they asked for a response this morning.

Thank you!
[redacted]

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 10 December 2024 4:45 PM
To: [redacted]
Subject: [redacted]

Hi [redacted]

I wonder if you can help me with something.

You may remember that in September Nigel Farage said that he was going to give up ownership of Reform UK and put forward a new constitution.

As far as I can see, the party structure has not changed at all: Farage is still the person for with significant control: https://find-and-update.company-information.service.gov.uk/company/11694875/officers

Meanwhile, I can't see any evidence of Reform having applied to change its constitution: https://www.electoralcommission.org.uk/political-registration-and-regulation/political-party-registration/view-current-applications

***

Can you let me know whether Reform UK has submitted any documentation to the Electoral Commission to change its constitution?

And have you seen or received any evidence that the party is in the process of changing from a private limited company to a company limited by liability?

I would be grateful if you could get back to me on this today if possible. If not, tomorrow

morning would be fine.

Best wishes,

[redacted]

[redacted]

From: Vijay Rangarajan
To: Orla Hennessy; [redacted]; [redacted]; Niki Nixon
Cc: Jackie Killeen; Hannah Brown; Laura Douglas; [redacted]
Subject: RE: [redacted] - Friday 29 November 2024
Date: 02 December 2024 10:14:45
Attachments: image001.png

Thanks. Agree we don't need to do this proactively. But good to set out in response to any questions that (as [redacted] says)

- We are discussing their constitution with Reform
- This needs to be done by 31 January
- It's part of a standard requirement on all parties for annual re-registration.

I'd like us to be ahead of the story – if it comes -that they don't meet the deadline, and then we have a problem registering them (as [redacted] says).

Vijay

Vijay Rangarajan
Chief Executive

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: Orla Hennessy [redacted]
Sent: 29 November 2024 12:41
To: [redacted] Vijay Rangarajan [redacted] Niki Nixon [redacted]
Cc: Jackie Killeen [redacted] Hannah Brown [redacted] Laura Douglas [redacted]
Subject: RE: In the News - Friday 29 November 2024

Thanks [redacted]. From my perspective I don't think proactively highlighting the date would be helpful as it will only invite questions and is not something we do for other party renewals. Helpful to have the below context though if the press team does get approached with any questions.

Orla

Orla Hennessy
Head of External Communications

From: [redacted]
Sent: 29 November 2024 12:30 PM

To: [redacted]; Vijay Rangarajan
[redacted] Niki Nixon
[redacted] Orla Hennessy
[redacted]
Cc: Jackie Killeen [redacted] Hannah Brown
[redacted] Laura Douglas
[redacted]
Subject: RE: In the News - Friday 29 November 2024

Hi all,

Thanks [redacted] for your update on this.

Just to put the legal requirements (and deadline) into wider context, and apologies if I'm going over old ground for anyone: all parties are required to confirm their registered details annually to effectively renew their registration. One of the requirements of a renewal is that a party must provide us with any updates to their constitution that have occurred since their last renewal notification.

Where we are aware of Reform updating their constitution (both having published it on their website but also through a well-publicised process at their recent conference), we are now expecting to have updates formally submitted to us before or alongside their upcoming renewal confirmation.

Vijay – to answer your question, I'm content for us to confirm (if asked) that we are in discussion with the party updating their constitution.

If we're specifically asked on the deadlines, then yes it's correct to say that in their case they need to do all of this by 31 January. I would want us to make clear though that the renewal process is a standard requirement for all parties, and one that is straightforward for all parties (Reform included) to meet. Keen to avoid any of this being misrepresented as us threatening to remove Reform from the register, with a looming deadline.

Happy to discuss if anyone has any questions.

Cheers,

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 29 November 2024 11:59 AM
To: Vijay Rangarajan [redacted] Niki Nixon
[redacted] Orla Hennessy
[redacted]

Cc: Jackie Killeen [redacted] Hannah Brown [redacted] Laura Douglas [redacted]
Subject: RE: In the News - Friday 29 November 2024

Hi Vijay,

I'm going to defer to [redacted] and [redacted] expertise on the more technical points and detail of what we might say, but yes we have advised them on the constitution. I do think there is an imperative that they have a draft to us by 31 January as they have a different version on their website to the version of the constitution we hold.

Will defer to Niki/Orla on how we would get the date out there.

[redacted]

From: Vijay Rangarajan [redacted]
Sent: 29 November 2024 11:29 AM
To: [redacted] Niki Nixon [redacted] Orla Hennessy [redacted]
Cc: Jackie Killeen [redacted] Hannah Brown [redacted] Laura Douglas [redacted]
Subject: Re: In the News - Friday 29 November 2024

Thanks! So if asked (and we may be) we can confirm that we are indeed in discussion with them on changing the constitution?

May be helpful to get that deadline out in public.

Copying Orla and Niki

Vijay

Vijay Rangarajan
Chief Executive
Electoral Commission

From: [redacted]
Sent: Friday, November 29, 2024 11:24 am
To: Vijay Rangarajan [redacted]
Cc: Jackie Killeen [redacted] Hannah Brown [redacted] Laura Douglas

[redacted]

Subject: RE: In the News - Friday 29 November 2024

Hi Vijay,

I've copied in [redacted]. [redacted] has sat in on recent meetings with Reform where we have discussed this and addressed this with them.

We have had several meetings with Reform, we are working with them to get an updated constitution. We have advised that their structure/organisation is a matter for them but their constitution and Financial scheme need to be reflective of their actual practice/organisation.

The change to company structure is a matter they would need to discuss with Companies house from a regulation perspective.

Their party renewal is due on 31 January, and they will need to submit their constitution alongside it as the one we hold is different to the one on their website.

[redacted] has advised as at this morning we don't have an updated constitution.

We have given advice and are managing the risk as the deadline gets closer.

[redacted]

From: Vijay Rangarajan [redacted]
Sent: 29 November 2024 10:59 AM
To: [redacted]
Cc: Jackie Killeen [redacted] Hannah Brown [redacted] Laura Douglas [redacted]
Subject: Fw: In the News - Friday 29 November 2024

[redacted]

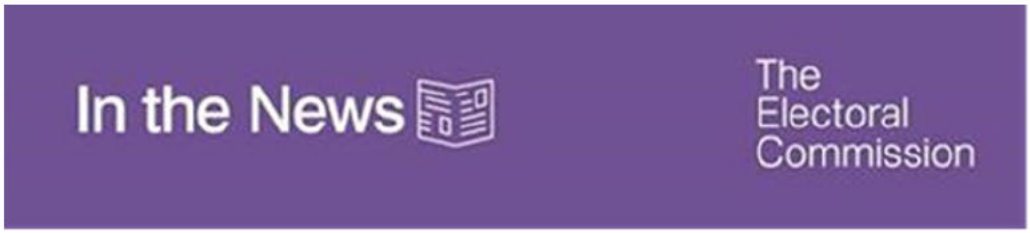
Is what Tice says accurate? That discussion has actually happened?

Vijay

Vijay Rangarajan
Chief Executive
Electoral Commission

From: [redacted]
Sent: Friday, November 29, 2024 10:10 am

To: All EC Staff including board [redacted] Commissioners Protected [redacted]
Subject: In the News - Friday 29 November 2024



Voter ID

Yesterday afternoon a motion was approved in the Lords Grand Committee to add the Veteran Card, the Scottish National Entitlement Card, and the Zimbabwean passport to the list of accepted forms of ID. You can find the full transcript of the debate here.

Party registration

Reform UK's former co-deputy leader, Ben Habib, was interviewed by GB News and TalkTV (both broadcast only) about leaving the party. He said one reason was due to the party not submitting an application to "democratise" the party constitution to the Electoral Commission.

Richard Tice MP, Reform UK's deputy leader, said on TalkTV (broadcast only) the party is working with the Commission to change the party's constitution to make it a "membership owned company limited by guarantee".

Irish general election

Polls have opened today for the Irish general election, which will elect 174 TDs to the Dáil, the leader of the largest party will become the Taoiseach (Prime Minister). As mentioned in Politico's London Playbook the final result may not be announced until Monday as most ballot papers are counted multiple times by hand.

Dis/mis-information

Coverage continues on the request for the European Commission to investigate TikTok about the platform's role in the first round of Romania's presidential elections. Politico reports on the EU's Digital Services Act which requires online platforms to "fight system risks including disinformation and election interference".

[redacted]

The Electoral Commission

electoralcommission.org.uk

From: [redacted]>
Sent: 18 February 2025 11:46 AM
To: Press <press@electoralcommission.org.uk>
Subject: MEDIA REQUEST - [redacted]

Good afternoon,

I hope you're keeping well.

Getting in touch to ask if you could please share what stage you are at in approving Reform UK from transferring over to become a party limited by guarantee from one limited by shares? It would be great to have a chat about how it all works if you're around this afternoon – I'm on [redacted]

Thanks ever so much,
[redacted]

[redacted]

From: [redacted]
To: [redacted]
Subject: RE: PRESS QUERY - URGENT: Comment on Reform UK change
Date: 27 September 2024 15:39:34

Many thanks for pulling this together [redacted] and for clearing [redacted], I'll issue to the journalist.

Thanks,
[redacted]

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]
Sent: 27 September 2024 3:01 PM
To: [redacted]
Subject: RE: PRESS QUERY - URGENT: Comment on Reform UK change

Hi [redacted]

1000 apologies for the delay, see below which has been approved by [redacted]

STARTS

Under the Political Parties, Elections and Referendums Act 2000 (PPERA), a party must provide a constitution that sets out the structure and organisation of the party, and we have published guidance for parties on the topics we expect a constitution to include. It is ultimately though for a party to choose how to structure itself, so long as it still complies with the relevant legislation. Parties may also change their structure and update their constitution after registration.

PPERA does not prevent a party from also being a company. Where PPERA does not specify the rights of party members, this is therefore a matter for the party to determine.

Parties may also be subject to other laws, such as company law, and have structures in place to meet these requirements. Our remit within this is to consider how any structures affect the ability of a party to meet the requirements under electoral law.

The Electoral Commission's remit extends to assessing party applications against the statutory tests set out in relevant law. Any changes to the law and to the Commission's remit are a matter for Parliament.

Regarding parties following their own constitutions, the Commission's role extends so far as to determine whether the structure set out in any document is consistent with electoral law and allows the party to comply with various statutory requirements at time of registration. Any concerns as to whether a party's constitution is being followed or not is a matter to raise with the party themselves.

ENDS

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]
Sent: 26 September 2024 10:09 AM
To: [redacted]
Subject: RE: PRESS QUERY - URGENT: Comment on Reform UK change

Just bringing this one to the top of inboxes this morning as would be good to get out the door today – let me know if you have any thoughts?

Thanks,
[redacted]

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]
Sent: 24 September 2024 5:15 PM
To: [redacted]
Subject: RE: PRESS QUERY - URGENT: Comment on Reform UK change

Hi [redacted],

As there isn't a strict deadline, I'll get back to you [redacted] on Thursday.

Cheers,

[redacted]

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 24 September 2024 4:16 PM
To: [redacted]
Subject: RE: PRESS QUERY - URGENT: Comment on Reform UK change

Hi again, realised you're both at an away day! There's not a strict deadline for this, so just looping in [redacted] as I'm on leave from tomorrow.

Thanks
[redacted]

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 24 September 2024 1:24 PM
To: [redacted]
Subject: RE: PRESS QUERY - URGENT: Comment on Reform UK change

Hi both,

Thanks for the help with this! We've had another query about Reform UK on the same issue which I've just added here:

"Reform UK announced a new Constitution at their recent conference, that was pretty much the same as the 2021 Constitution.

Can I ask a general question, more for understanding, not for a news item (feel free to respond saying it is just for advice)

When you have a party that comes to you with a constitution, that says the legal entity will be a Limited Liability Company, should part of what is agreed with the Electoral Commission be an agreement around the ownership of the party ?

The 2021 Reform constitution says that the members of the party are the shareholders, the updated version does show a more typical member structure.

Should there be changes in the Electoral Commission vetting to ensure that isn't allowed going forward ?

Also, if I have a concern that party has operated in a way that is not to the constitution, what should I do ?

This isn't meant to be criticism of the Electoral Commission, but I do have concern in what I see from Reform UK."

I've pulled from our previous response, but just tweaked it below this email to reply to this. Just checking if you had any thoughts or changes? Also if we have any remit if a party is not operating as per their constitution?

Thanks!
[redacted]

//

Response:

The rules for registering a political party are set out in electoral law, specifically the Political Parties, Elections and Referendums Act 2000 (PPERA). When Reform UK applied to register we assessed its constitution and were satisfied it met the legal requirements.

A party must provide a constitution that sets out the structure and organisation of the party, and we have published guidance for parties on the topics we expect a constitution to include. It is ultimately though for a party to choose how to structure itself, so long as it still complies with the relevant legislation. Parties may also change their structure and update their constitution after registration.

If a party makes changes to their constitution, they are required to submit these changes to the Commission, and we will assess any revised constitution against the statutory requirements.

[redacted])

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 20 September 2024 11:53 AM
To: [redacted]
Subject: RE: PRESS QUERY - URGENT: Comment on Reform UK change

Looks good to me!

[redacted] let's go with the two paragraphs below.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]
Sent: 20 September 2024 11:30 AM
To: [redacted]
Subject: RE: PRESS QUERY - URGENT: Comment on Reform UK change

Hi both,

I've tried to keep it as simple as possible and basically used the start and end of [redacted]draft below. Grateful if you could give it a sense check [redacted]as I'm about to go into a meeting.

The rules for registering a political party are set out in the Political Parties, Elections and Referendums Act 2000 (PPERA). A party must provide a constitution that sets out the structure and organisation of the party, and we have published guidance for parties on the topics we expect a constitution to include. It is ultimately though for a party to choose how to structure itself, so long as it still complies with the relevant legislation. Parties may also change their structure and update their constitution after registration.

If a party makes changes to their constitution, they are required to submit these changes to the Commission, and we will assess any revised constitution against the statutory requirements.

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: Party Reg <Partyreg@electoralcommission.org.uk>
Sent: 20 September 2024 11:17 AM
To: [redacted]

[redacted]
Subject: PRESS QUERY - URGENT: Comment on Reform UK change

Hi [redacted],

I've made some amends below in red.

[redacted] can you review and sign off?

STARTS

The rules for registering a political party are set out in the Political Parties, Elections and Referendums Act 2000 (PPERA). PPERA 26(9) requires that a party provide a constitution that sets out the structure and organisation of the party, and while our guidance sets out the topics we expect a constitution to include, this is not an exhaustive list, and indeed there are myriad ways that a party may choose to structure itself that still allow it to comply with the relevant legislation.

If a party makes changes to their constitution, they are required to submit these changes to the Commission to ensure it is compliant with the Political Parties, Elections and Referendums Act 2000 (PPERA). This is done alongside our Public Sector Equality duty. We consider our Public Sector Equality Duty with every application submitted to us.

As the registrar of political parties our role is to consider applications against the criteria set out in electoral law. PPERA does not specify how a party should structure itself and it is ultimately for a party to decide how it wishes to operate and what rights its members have. Parties are free to structure and re-structure themselves as they see fit, and we will assess any revised constitution for its continued compatibility with the relevant legislation.

ENDS

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]
Sent: 20 September 2024 10:43 AM
To: Party Reg <Partyreg@electoralcommission.org.uk>
Subject: FW: URGENT: Comment on Reform UK change

Hi all,

We've received a request for comment about Reform UK announcing that Nigel Farage is giving up ownership and they will adopt a new constitution.

They asked if its possible to overhaul a party system and if there will be any problems, and I have just pulled something together below. I can't see any existing or previous lines for this kind of query, so do let me know if I'm incredibly wrong!

Their deadline is COP today, also.

Thanks
[redacted]

//

When a party registers with the Commission, they must also provide a constitution that sets out the structure and organisation of the party. If a party makes changes to their constitution, they will need to submit these changes to the Commission to ensure it is compliant with the law.

As the registrar of political parties our role is to consider applications against the criteria set out in electoral law. This is done alongside our Public Sector Equality duty. We consider our Public Sector Equality Duty with every application submitted to us. To note, party constitutions are not routinely published by the Commission.

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 20 September 2024 8:04 AM
To: Press <press@electoralcommission.org.uk>
Subject: URGENT: Comment on Reform UK change

Good morning,

[redacted]e, I'm a journalist writing a piece for [redacted].

Nigel Farage has announced that he is giving up ownership of the party. Reform was established as a private limited company, with Farage holding the majority of shares. He said there will be a major overhaul as, for the first time, members will be able to vote on policy motions, including to adopt a new constitution, which sets out party rules and the responsibilities of the leadership.

Under the proposed new Reform UK constitution, members will be able to remove Farage -

or any other party leader - in a no-confidence vote. A vote can be triggered if 50% of all members write to the chairman requesting a motion of no confidence. Reform MPs can also force a vote if 50 of them, or 50% of them, write to the chairman requesting one. But this only applies if there are more than 100 Reform MPs in Parliament - a high bar.

Mr Farage said all changes subject to working with the electoral commission and that it wouldn't be a problem.

I wondered whether you might be able to send me comment by EOP today (Friday) regarding whether this is possible to overhaul a party system and if so, whether there will be any "problems"?

Thanks so much and kind regards,

[redacted]

--

[redacted]

From: [redacted]
To: Charlene Hannon; [redacted]
Subject: Re: Press query: constitutions
Date: 24 April 2025 16:10:08

Thanks both — sounds good to me, I'll remove that FOI line and will let you know if there's any follow up.

Thanks
[redacted]

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: Charlene Hannon [redacted]
Sent: 24 April 2025 15:59
To: [redacted]
Subject: Re: Press query: constitutions

Hi - thanks for sharing this

This looks fine, except i would remove references to the FOI process, feels out of place, especially when a version of the constitution has been published online by the party themselves

So we can just say that we do not publish party constitutions on our website, but if they are specifically looking for a copy of Reform Uks constitution, we understand they have published it online themselves and it can be found here....

No need to make this any more complicated i think

thanks,
C

From: [redacted]
Sent: 24 April 2025 15:01
To: [redacted] Charlene Hannon
Subject: Re: Press query: constitutions

Hi [redacted],

I'm happy with that. Charlene - would you mind taking a quick look? All fairly standard stuff I think but where it's a national I wouldn't mind a second pair of eyes.

Cheers,

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: Thursday, April 24, 2025 13:54
To: [redacted]
Subject: Re: Press query: constitutions

Thanks [redacted] — would you be alright with this version, which has just been simplified in some places?

Political party constitutions are not published on our website.

You may request information that we hold, or you believe we hold, under the Freedom of Information Act.

Alternatively, if its Reform UK that you are specifically interested in, they have published a copy of their constitution online and you can access it here. To note, the only change between this version and the one submitted to the Commission was the addition of a company number. The Electoral Commission approved registration of that version of the constitution on 21 March 2025.

Thanks
[redacted]

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 24 April 2025 12:51
To: [redacted]

Subject: Re: Press query: constitutions

Hi [redacted],

I've added some extra lines that we used in a response to an FOI requesting Reform's constitution. I know the query isn't actually asking for a copy of the constitution, but maybe helpful to confirm the version online is the version submitted to us, and the process leading to registration. Let me know if you're happy with that.

Constitution updates do not fall under our statutory decision making in the same way in which party applications to register names, descriptions and emblems do. Constitution updates are not published for public comment as part of our considerations, and do not appear on our record of published decisions, nor are they published on our website.

You may request information that we hold, or you believe we hold, under the Freedom of Information Act. Alternatively, Reform UK have published a copy of their constitution online, as submitted to the Commission on 20 January 2025, and you can access it here.

To note, the party provided an updated version of the constitution published on their website to the Electoral Commission, which also includes a company number – 16260766. This company number is also publicly accessible through Companies House. The Electoral Commission approved registration of this version of the constitution on 21 March 2025.

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: Thursday, April 24, 2025 10:59
To: [redacted]
Subject: Press query: constitutions

Hi both,

The FT has got in touch below about constitutions, Reform and if they are published on our website. I have just pulled together some lines and some we have used before, but just wanted to check if you had any edits or amends?

Thanks!

[redacted]

//

Constitution updates do not fall under our statutory decision making in the same way in which party applications to register names, descriptions and emblems do. Constitution updates are not published for public comment as part of our considerations, and do not appear on our record of published decisions, nor are they published on our website. A copy can be requested via a Freedom of Information request, or by contacting the party directly.

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 24 April 2025 10:50
To: Press <press@electoralcommission.org.uk>
Subject: constitutions

S[redacted]d this message don't often get email from [redacted]. Learn why this is important

Hello

I was just hoping to clarify a bit of electoral law with you.

I know political parties have to have a constitution and submit it to the Electoral Commission, but would that normally be published on your website?

It has been pointed out to me that Reform UK's constitution isn't currently publicly available and I'm not sure whether it's supposed to be.

Many thanks

[redacted]

Please don't leave voicemails, thankyou

[redacted]

[redacted]

From: Niki Nixon
To: [redacted]; Jackie Killeen; Claire Robbie; [redacted]
Cc: Laura Douglas; Hannah Brown; Orla Hennessy
Subject: RE: Press query: Reform UK current constitution
Date: 17 January 2025 17:05:22

Thanks [redacted], that's good to go

From: [redacted]
Sent: 17 January 2025 4:20 PM
To: Niki Nixon [redacted] Jackie Killeen [redacted] Claire Robbie [redacted]
Cc: Laura Douglas [redacted] Hannah Brown [redacted] Orla Hennessy [redacted]
Subject: RE: Press query: Reform UK current constitution

Thanks both.

With thanks to [redacted] we've just added a line to the second answer the below which hopefully helps to explain:

1. As the party has a new legal entity, how does it work changing its registration with the Electoral Commission (is it just a new registration) ?

The party's registration status has not changed, but as mentioned a party must submit any changes to its constitution by the deadline of its next annual renewal confirmation. For Reform, this means the updated constitution must be submitted by 31 January 2025.

2. The current Constitution says that members of the party must be shareholders. So claims from Reform that members are 170,000+ are not true, the number of members is 3. Would there be action from the commission based on a false claim ?

It is for a party to decide the processes and rules governing membership. The Commission does not regulate what parties say. Our regulatory powers apply to enforcing the political finance laws.

3. Reform have published a revised Constitution at a recent conference (September) and it was very much said that was the new Constitution. People are paying a subscription (believing that it is membership) and that they are joining a party with that new Constitution.

We are aware that Reform published a revised constitution and are in discussion with the party about its submission. We have not yet received an updated copy.

4. When you say in discussion, but haven't received an updated Constitution. Does that mean you have draft versions you are talking about, or does in discussion really mean that the commission are asking Reform to

submit the revision ?

The Commission engages with parties throughout the year, and ahead of relevant deadlines, to support them in maintaining their details and registration. We don't disclose the detail of the conversations we have with parties.

5. Can a person, stand and be elected as an MP for a party if they are not a member ?

-

Candidates that wish to stand on behalf of political party at an election must submit a certificate of authorisation as part of their nomination papers. The certificate must be signed by the registered Nominating Officer of the political party. Whether the candidate is required to be a member would be up to the party.

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: Niki Nixon [redacted]
Sent: 17 January 2025 3:00 PM
To: Jackie Killeen [redacted] Claire Robbie [redacted]
Cc: Laura Douglas [redacted] Hannah Brown [redacted] Orla Hennessy [redacted]
Subject: RE: Press query: Reform UK current constitution

Hi all,

I've made one change below and added a comment where I think we could say more to clear up a misunderstanding.

Thanks, Niki

From: Jackie Killeen [redacted]
Sent: 17 January 2025 11:01 AM
To: [redacted] Niki Nixon [redacted] Claire Robbie [redacted]
Cc: Laura Douglas [redacted]; Hannah Brown [redacted] Orla Hennessy [redacted]
Subject: RE: Press query: Reform UK current constitution

Morning [redacted]

Thanks, these look good to me. The only very tiny tweak I would make is to remove the 'only' from No 2 as technically (though not relevantly for this response we do have some wider regulatory responsibilities eg digital imprints).

Best wishes

Jackie

From: [redacted]
Sent: 17 January 2025 10:44 AM
To: Niki Nixon [redacted]; Claire Robbie [redacted] Jackie Killeen [redacted]
Cc: Laura Douglas [redacted] Hannah Brown [redacted] Orla Hennessy [redacted]
Subject: RE: Press query: Reform UK current constitution

Hi Niki, Jackie,

We have updated the answers on this to be more direct. Please do let me know your thoughts on the below.

Thanks
[redacted]

//

1. As the party has a new legal entity, how does it work changing its registration with the Electoral Commission (is it just a new registration) ?

The party's registration status has not changed, but as mentioned a party must submit any changes to its constitution by the deadline of its next annual renewal confirmation. For Reform, this means the updated constitution must be submitted by 31 January 2025.

2. The current Constitution says that members of the party must be shareholders. So claims from Reform that members are 170,000+ are not true, the number of members is 3. Would there be action from the commission based on a false claim ?

The Commission does not regulate what parties say. Our regulatory powers only apply to enforcing the political finance laws. [Is there anything we can say here about the difference between shareholders and members?]

3. Reform have published a revised Constitution at a recent conference (September) and it was very much said that was the new Constitution.

People are paying a subscription (believing that it is membership) and that they are joining a party with that new Constitution.

We are aware that Reform published a revised constitution and are in discussion with the party about its submission. We have not yet received an updated copy.

4. When you say in discussion, but haven't received an updated Constitution. Does that mean you have draft versions you are talking about, or does in discussion really mean that the commission are asking Reform to submit the revision ?

The Commission engages with parties throughout the year, and ahead of relevant deadlines, to support them in maintaining their details and registration. We don't disclose the detail of the conversations we have with parties.

5. Can a person, stand and be elected as an MP for a party if they are not a member ?

-

Candidates that wish to stand on behalf of political party at an election must submit a certificate of authorisation as part of their nomination papers. The certificate must be signed by the registered Nominating Officer of the political party. Whether the candidate is required to be a member would be up to the party.

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: Niki Nixon [redacted]
Sent: 16 January 2025 6:20 PM
To: Claire Robbie [redacted] Jackie Killeen [redacted]
Cc: Laura Douglas [redacted] Hannah Brown [redacted]
Subject: RE: Press query: Reform UK current constitution

Hi all,

Orla is going to have a look at the responses before I sign them off.

Thanks, Niki

From: Claire Robbie <[redacted]
Sent: 16 January 2025 3:47 PM
To: [redacted] Niki Nixon [redacted] Jackie Killeen [redacted]

Cc: Laura Douglas [redacted] Hannah Brown [redacted]
Subject: RE: Press query: Reform UK current constitution

Hi [redacted] – just to flag that Jackie is having issues with accessing emails on the train. Laura and Hannah are also both unwell today.

I have had a fresh read through and am happy, but will certainly defer to Niki for sign off.

Many thanks for all your work on this,
Claire

From: [redacted]
Sent: Thursday, January 16, 2025 3:39 PM
To: [redacted] Niki Nixon [redacted] >; Jackie Killeen [redacted]
Cc: Laura Douglas [redacted] Claire Robbie [redacted] Hannah Brown [redacted]
Subject: Press query: Reform UK current constitution

Hi Niki, Jackie,

One more Reform query! A local journalist from [redacted] asked some more questions about Reform's constitution and the process of registration below. Again, because this is featuring in the news a fair bit, I wanted to check you were also happy with the responses before I send?

Thanks again
[redacted]

//

1. As the party has a new legal entity, how does it work changing its registration with the Electoral Commission (is it just a new registration) ?

Any company structure changes, from a regulatory perspective, would be a matter for Companies House and not the Electoral Commission.

2. The current Constitution says that members of the party must be shareholders. So claims from Reform that members are 170,000+ are not true, the number of members is 3. Would there be action from the commission based on a false claim ?

The Commission is not responsible for regulating the content of campaign material. If a registered party was not acting in accordance with their constitution, this would likely be an internal party matter. You may wish to contact the party directly.

3. Reform have published a revised Constitution at a recent conference (September) and it was very much said that was the new Constitution. People are paying a subscription (believing that it is membership) and that they are joining a party with that new Constitution.

To date, we have not received an updated copy of the Reform UK constitution since their September 2024 conference. As stated previously, a party must submit any changes to its constitution by the deadline of its next annual renewal confirmation. For Reform, this means the updated constitution must be submitted by 31 January 2025

4. When you say in discussion, but haven't received an updated Constitution. Does that mean you have draft versions you are talking about, or does in discussion really mean that the commission are asking Reform to submit the revision ?

We are in active discussion with the party about the submission of their updated constitution. It is the responsibility of the party to submit an updated constitution for the purposes of meeting their requirements to remain registered.

5. Can a person, stand and be elected as an MP for a party if they are not a member ?

The Commission does not have a role in candidate selection. Internal party structures differ, and it is for the party to determine, so I would suggest contacting the party directly for their criteria.

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 14 January 2025 5:34 PM
To: [redacted]
Cc: Laura Douglas [redacted] Claire Robbie
[redacted]
Subject: RE: Press query: Reform UK current constitution

H[redacted]

Thanks for your email. I've drafted some answers below. No further comment from me on your suggestion for question 5.

Laura/Claire – did you want to add anything?

1. As the party has a new legal entity, how does it work changing its registration with the Electoral Commission (is it just a new registration) ?

Any company structure changes, from a regulatory perspective, would be a matter for Companies House and not the Electoral Commission.

2. The current Constitution says that members of the party must be shareholders. So claims from Reform that members are 170,000+ are not true, the number of members is 3. Would there be action from the commission based on a false claim ?

The Commission is not responsible for regulating the content of campaign material. If a registered party was not acting in accordance with their constitution, this would likely be an internal party matter. You may wish to contact the party directly.

3. Reform have published a revised Constitution at a recent conference (September) and it was very much said that was the new Constitution. People are paying a subscription (believing that it is membership) and that they are joining a party with that new Constitution.

To date, we have not received an updated copy of the Reform UK constitution since their September 2024 conference. As stated previously, a party must submit any changes to its constitution by the deadline of its next annual renewal confirmation. For Reform, this means the updated constitution must be submitted by 31 January 2025

[there isn't actually a question here, so not sure what they want here. Suggest we play it straight bat]

4. When you say in discussion, but haven't received an updated Constitution. Does that mean you have draft versions you are talking about, or does in discussion really mean that the commission are asking Reform to submit the revision ?

We are in active discussion with the party about submission of their updated constitution. It is the responsibility of the party to submit an updated constitution for the purposes of meeting their requirements to remain registered.

5. Can a person, stand and be elected as an MP for a party if they are not a member ?

The Commission does not have a role in candidate selection. Internal party structures differ and it is for the party to determine, so I would suggest contacting the party directly for their criteria.

[redacted]

The Electoral Commission

[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 13 January 2025 11:57 AM
To: [redacted]
Subject: Re: Reform UK current constitution

Hi [redacted]

Another question is.

Can a person, stand and be elected as an MP for a party if they are not a member ?

That would put doubt on all but two of the validity of the Reform MP's

Regards

[redacted]

From: [redacted]
Sent: 13 January 2025 10:09 AM
To: [redacted]
Subject: Re: Reform UK current constitution

Hi [redacted]

At the Reform conference, from party governance point of view, they announced that they had a new Constitution, that they published to members, and a change in legal ownership of the party from a limited company, with a few shareholders, to a plc limited by guarantee.

As a party that is saying that it is democratising, their revised constitution makes it difficult for the Leader to be changed - a fundamental part of democracy.

I think some of what I am seeing is very worrying. If OK, I will only publish with your agreement, meaning I would come back to you first.

Very happy to receive guidance/ non publishable.

1. As the party has a new legal entity, how does it work changing its registration with the Electoral Commission (is it just a new registration) ?

2. The current Constitution says that members of the party must be shareholders. So claims from Reform that members are 170,000+ are not true, the number of members is 3. Would there be action from the commission based on a false claim ?

3. Reform have published a revised Constitution at a recent conference (September) and it was very much said that was the new Constitution. People are paying a subscription (believing that it is membership) and that they are joining a party with that new Constitution.

4. When you say in discussion, but haven't received an updated Constitution. Does that mean you have draft versions you are talking about, or does in discussion really mean that the commission are asking Reform to submit the revision ?

Also, I have setup www.reformukwatch.co.uk which is very much a fledgling, but with the aim of just reporting objectively on Reform UK.

Happy to chat of course if easier than emails.

Regards

[redacted]

[redacted]

On 12/01/2025 13:45, [redacted] wrote:

> Hi [redacted]
>
> No worries.
>
> The Commission is in discussion with Reform UK about updating its constitution, which is the current one. We have not yet received an updated constitution from the party since its conference in September 2024. By law, a party must submit any changes to its constitution by the deadline of its next annual renewal confirmation. For Reform, this means the changes must be submitted by 31 January 2025.
>
> Best
> [redacted]
>
> [redacted]
>
> **The Electoral Commission**

electoralcommission.org.uk

From: [redacted]
Sent: 12 January 2025 1:41 PM
To: [redacted]
Subject: Re: Reform UK current constitution

Hi [redacted],

Thanks for coming back on a Sunday.

That was useful to see that version.

What I was trying to see was if the declared Constitution that Reform have said is currently is actually registered/ approved by the Electoral Commission.

Is that 2021 the most current version you hold from the party ?

Regards

[redacted]

On 12/01/2025 13:38, [redacted] wrote:

> Hi [redacted],
>
> Yes, party constitutions are not routinely published by the Commission, but the most recent version of Reform UK's constitution was released via a Freedom of Information request in 2021, which you can find here. This constitution was assessed and considered compliant.
>
> Best,
> [redacted]
>
> [redacted]
>
> **The Electoral Commission**
> electoralcommission.org.uk

From: [redacted]
Sent: 12 January 2025 1:29 PM
To: Press <press@electoralcommission.org.uk>
Subject: Reform UK current constitution

Hi,

I am still looking at Reform UK.

Would you be able to send me a copy of their current constitution ?

I know in the past you have said that you don't normally send out, does an FOI request make it easier to process?

Regards

--

[redacted]

[redacted]

[redacted]

[redacted]
[redacted]

[redacted]

[redacted]
[redacted]
[redacted]
[redacted]
[redacted]
[redacted]
[redacted]

[redacted]

From: Laura Douglas
To: [redacted] Hannah Brown
Cc: [redacted]
Subject: RE: Press query: [redacted]
Date: 24 January 2025 16:24:03

Hi,

Suggested a few tweaks and removal of final sentence in the second paragraph to avoid the obvious follow up question of is something wrong with it?

Laura

Laura Douglas (she/her)
Head of Regulatory Support

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 24 January 2025 3:22 PM
To: [redacted] Hannah Brown [redacted] Laura Douglas [redacted]
Cc: [redacted]
Subject: RE: Press query: The National

Hi [redacted],

I've made some adjustments as we are actually now in receipt of Reform's updated constitution. Hannah is off at the moment so perhaps Laura can review from a Head capacity.

By law, a registered party must submit any changes to its constitution to the Commission by time of its next annual renewal deadline. As part of its work to support its stakeholders, the Commission ~~will~~ provides advice and guidance to any registered party updating its constitution, on how the processes outlined in a constitution interact with a party's legal obligations under electoral law.

We can confirm that Reform UK submitted and updated constitution to the Commission in January 2024, alongside its renewal notification. We are currently considering the updates submitted~~, to inform any advice and guidance we may give to the party.~~

Any company structure changes, from a regulatory perspective, would be a matter for Companies House and not the Electoral Commission. If a party's company arrangements are reflected in party documents such as a constitution and financial scheme, we would expect these documents to be updated with the Commission to reflect any changes.

[redacted]

The Electoral Commission
[redacted].org.uk

From: [redacted]
Sent: 24 January 2025 2:44 PM
To: [redacted]>; Hannah Brown [redacted] Laura Douglas <[redacted]
Cc: [redacted]
Subject: Press query: [redacted]

Hi [redacted] Hannah, Laura,

We've had a call from the [redacted] about Reform's membership changes/making members shareholders at its conference in September. They've asked if something needs to be signed off by us, so I've pulled together our lines on the constitution below, and wanted to check these are still correct to issue?

They asked if we can get back to them as soon as possible. Also copying in [redacted] for info since it's from a Scottish paper.

Thanks
[redacted]

//

The Commission is in discussion with Reform UK about updating its constitution. We have not yet received an updated constitution from the party since its conference in September 2024. By law, a party must submit any changes to its constitution by the deadline of its next annual renewal confirmation. For Reform, this means the changes must be submitted by 31 January 2025.

Any company structure changes, from a regulatory perspective, would be a matter for Companies House and not the Electoral Commission. If a party's company arrangements are reflected in party documents such as a constitution and financial scheme, we would expect these documents to be updated with the Commission to reflect any changes.

[redacted])

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: Party Reg
To: [redacted]
Subject: RE: Reform UK - [redacted]
Date: 29 January 2025 10:24:48

Thanks [redacted],

[redacted] this is a line that's gone to a handful of press outlets including the FT.

I don't really see a reason to deviate from this but welcome your thoughts.

[redacted], can you reply when we get [redacted] sign-off? If we're sticking with this line I don't think Reg need to respond to it if he's come to you.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]
Sent: 29 January 2025 10:16 AM
To: Party Reg <Partyreg@electoralcommission.org.uk>; [redacted]
Subject: RE: [redacted]

Thanks [redacted] – this is the current line if you want to use this:

We can confirm that Reform UK submitted an updated constitution to the Commission in January 2025, alongside its renewal notification. We are currently considering the updates submitted.

Thanks
[redacted]

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: Party Reg <Partyreg@electoralcommission.org.uk>
Sent: 29 January 2025 10:13 AM
To: [redacted]

Subject: Reform UK - [redacted]

Morning [redacted]

Thanks for this.

Can you confirm for me what the line we sent to the FT was yesterday on this – I understand this was a repeat line from an earlier press query.
I suspect the same line will be perfectly fine here, but could you set it out and [redacted] and I will confirm.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]
Sent: 29 January 2025 10:10 AM
To: Party Reg <Partyreg@electoralcommission.org.uk>
Subject: FW: Reform UK

Morning all,

I've just received an email from [redacted] below. Are you able to pick this up please?

Thanks
[redacted]

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 29 January 2025 10:01 AM
To: [redacted]
Subject: Reform UK

Good morning [redacted]

I understand that Reform UK is obliged to have submitted its new constitution to the EC by 31 January. Please could I trouble you confirm this is the case and if they have yet made this submission?

Many thanks

Best wishes

[redacted]

[redacted]

From: [redacted]
To: [redacted]
Subject: RE: Reform UK constitution
Date: 20 February 2025 16:00:03

Thanks

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]
Sent: 20 February 2025 3:58 PM
To: [redacted]
Subject: Reform UK constitution

Hi [redacted],

Reform UK submitted an updated constitution to us on 20 January. We acknowledged receipt of this to the party on 30 January, and we are currently considering the constitution submitted. No formal decision has been taken.

Cheers,

[redacted]

[redacted]

The Electoral Commission

[redacted]

electoralcommission.org.uk

From: Claire Robbie
To: [redacted]; Laura Douglas; [redacted]
Cc: Orla Hennessy; Charlene Hannon
Subject: RE: Reform uk press query
Date: 14 March 2025 16:27:35

Thanks [redacted].

I have copied in [redacted] and Charlene for their information on Monday.

Best
Claire

From: [redacted]
Sent: Friday, March 14, 2025 4:12 PM
To: Laura Douglas [redacted] Claire Robbie [redacted]
Cc: Orla Hennessy [redacted]
Subject: FW: Reform uk press query

Hi both,

Just wanted to share the below press query for your information and not for sign-off. The Guardian has been in touch about Reform UK's constitution, and if there has been an outcome to our considerations.

We will be issuing the below, existing line:

We can confirm that Reform UK submitted an updated constitution to the Commission in January 2025, alongside its renewal notification. We are currently considering the updates submitted.

Thanks
[redacted]

[redacted]

The Electoral Commission
[redacted]

From: [redacted]
Sent: 14 March 2025 3:23 PM
To: Press <[redacted]>
Subject: Reform uk

Hello there

Could I please check if there has now been an outcome to the talks which the

electoral commission has been having with Reform Uk in relation to the constitution of the party and the legal basis on which it is constituted ?

[redacted]

[redacted]

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[redacted]

From: Party Reg
To: [redacted]
Subject: RE: Reform UK research
Date: 07 January 2025 16:28:54

Hi [redacted]

I emailed earlier this afternoon linking you to an FOI request released in 2021 which contains the latest registered constitution of Reform UK.

The party first registered as The Brexit Party in 2019, changing its name to Reform UK in 2021. An FOI disclosing the original application form for The Brexit Party can be found here: https://www.electoralcommission.org.uk/sites/default/files/2023-11/FOI%20155-23%20-%20Response%20%28redacted%29.pdf

The original constitution and financial scheme of the Brexit Party can be found in the following FOI 027-19: https://www.electoralcommission.org.uk/sites/default/files/2019-07/FOI%20027%2019%20Response.pdf

Before submitting further requests for documentation, please first check our FOI page to see if this has been disclosed in the past: https://www.electoralcommission.org.uk/about-us/freedom-information

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

-----Original Message-----
From: [redacted]
Sent: 07 January 2025 3:21 PM
To: Party Reg <Partyreg@electoralcommission.org.uk>
Subject: Reform UK research

Hello,

I am researching Reform UK and was hoping I could get a copy of their application to become a registered political party and any information they gave about their governance structure if this is available to the public.

Thank you.

[redacted]

From: [redacted]
To: Laura Douglas; Orla Hennessy
Cc: Charlene Hannon; [redacted]; Niki Nixon; [redacted]
Subject: Re: Reform UK updated constitution LTT
Date: 24 March 2025 14:09:44

Hi all,

Thanks for reviewing the LTT.

I've just informed the party that we've approved registration of their updated constitution.

Cheers,

[redacted]

The Electoral Commission
[redacted]

From: Laura Douglas [redacted]
Sent: 24 March 2025 13:31
To: Orla Hennessy [redacted]
Cc: Charlene Hannon [redacted]; Niki Nixon [redacted]
Subject: RE: Reform UK updated constitution LTT

Works for me. [redacted] will you confirm when you've sent to the party?

Thank you,

Laura

Laura Douglas (she/her)
Head of Regulatory Support

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: Orla Hennessy [redacted]
Sent: 24 March 2025 11:18 AM
To: [redacted] Laura Douglas
[redacted]
Cc: Charlene Hannon [redacted]

[redacted]; Niki Nixon [redacted]

Subject: Re: Reform UK updated constitution LTT

Hi all,

I've added one question to the document. [redacted]/Laura if you're happy with that, then happy for the letter to go.

Thanks
Orla

Orla Hennessy
Head of External Communications

From: [redacted]
Sent: Friday, March 21, 2025 17:24
To: Niki Nixon; [redacted]; Orla Hennessy
Cc: Charlene Hannon; Laura Douglas
Subject: Re: Reform UK updated constitution LTT

Thanks Niki. I've sent a holding response to the party for info.

Orla/[redacted] give me a shout if there's any questions on Monday, will make myself available.

Cheers,

[redacted]

The Electoral Commission
[redacted]

From: Niki Nixon
Sent: Friday, March 21, 2025 17:19
To: [redacted]; Orla Hennessy
Cc: Charlene Hannon; Laura Douglas; [redacted]

Subject: Fw: Reform UK updated constitution LTT

[redacted], Orla,

[redacted] and Laura are planning to update Reform on Monday regarding our decision on their constitution.

Please could you look at the LTT [redacted] has pulled together and finalise these by lunch time, so that they can make contact?

Thanks very much, Niki

From: [redacted]
Sent: Friday, March 21, 2025 13:07
To: Laura Douglas; Press
Cc: Charlene Hannon; Niki Nixon
Subject: Reform UK updated constitution LTT

Hi all,

Jackie has now taken a decision to approve registration of Reform UK's updated constitution. At time of writing, the party have not yet been informed but Laura and I are reviewing an email to inform them of this, with the intention of sending this afternoon.

Imagine we might get some wider public interest in this, so I have pulled together my starter for ten on some LTT on the topic. Imagine there is probably some crossover with existing LTT so grateful if someone from press could review to make sure things are standardised.

2025-03-21 Reform UK updated constitution LTT.docx

Niki - copying you in as I know Orla is on leave today.

Cheers,

[redacted]

The Electoral Commission

[redacted]

From: [redacted]
To:
Subject: RE: Reform uk
Date: 14 March 2025 16:25:49

Thanks [redacted]!

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 14 March 2025 3:55 PM
To: [redacted]
Subject: RE: Reform uk

Hi [redacted],

Yup, still the line, no change as of yet.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]
Sent: 14 March 2025 15:34
To: [redacted]
Subject: FW: Reform uk

Hi both,

[redacted] is asking about Reform's constitution below – just wanted to check this line is still right to use?:

We can confirm that Reform UK submitted an updated constitution to the Commission in January 2025, alongside its renewal notification. We are currently considering the updates submitted.

Thanks!
[redacted]

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 14 March 2025 3:23 PM
To: Press <press@electoralcommission.org.uk>
Subject: Reform uk

Hello there

Could I please check if there has now been an outcome to the talks which the electoral commission has been having with Reform Uk in relation to the constitution of the party and the legal basis on which it is constituted ?

[redacted]

[redacted]

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[redacted]

From: [redacted]
To:
Subject: RE: renewal of Party registration
Date: 20 January 2025 15:59:29

Hi [redacted],

Thanks for pulling this together. I've made a few tweaks below, mainly covering the order in which [redacted] will need to complete the steps through PEF Online. If you're happy with the text below please send this out today, and hopefully we'll get everything submitted shortly!

Dear [redacted],

My colleague [redacted] has passed on your email about completing your party's renewal application as the updated constitution is now ready for submission.

I see you have enquired about not having a new registered company number, I can confirm that you can leave this information and provide it to us at a later stage. This will not impact your ability for us to deem your renewal as compliant.

You can complete the renewal and upload the new constitution through PEF Online. If you are using PEF Online, please make sure you first click to 'renew registration' from the pink left hand menu, and then follow steps to amend details and upload a new constitution. Once you then progress to submission, you will be prompted to pay the renewal fee.

If you attempt to change details first, the system will not allow you to complete a renewal until the other changes have been processed.

If you have any questions regarding the renewal application or submitting the updated constitution, please do contact me on the information below.

Kind regards,

[redacted]

The Electoral Commission
[redacted]

From: [redacted]
Sent: 20 January 2025 2:34 PM
To: [redacted]
Subject: FW: renewal of Party registration

Dear [redacted]

We have received your email about completing your party's renewal application as the updated constitution is now ready for submission.

I see you have enquired about not having a registered company number, I can confirm that you can leave this section of the application blank.

You can complete the renewal and upload the new constitution as normal. We can receive a new company number at a later stage.

If you have any questions regarding the renewal application or submitting the updated constitution, please do contact me on the information below.

Kind regards,

[redacted]

The Electoral Commission

[redacted]

From: [redacted]>
Sent: 20 January 2025 1:39 PM
To: [redacted]>
Cc: [redacted]>; Party Reg <Partyreg@electoralcommission.org.uk>
Subject: Re: renewal of Party registration

Dear [redacted]
Many thanks. I hope to see you before I leave.
Kindest regards

[redacted]

On Mon, 20 Jan 2025 at 13:36, [redacted]> wrote:

> Hi [redacted]
>
> Thank you for the information, I have copied in the party registration team so they are aware and can respond as necessary.
>
> Kind regards,
>
> [redacted]

[redacted]

The Electoral Commission
[redacted]

From: [redacted]>
Sent: 20 January 2025 10:29 AM
To: [redacted]>; [redacted]
[redacted]>
Subject: renewal of Party registration

Dear [redacted] and [redacted]
I want to complete the Party registration renewal as the new Constitution has been completed now and I can upload it.

However, I do not have the new company registration number and I intend to leave it blank; and as soon as the new number is available I can add it to the new Constitution.

Kind regards

[redacted]

[redacted]

[redacted]

[redacted].

[redacted]

From: [redacted]
To: Orla Hennessy; Laura Douglas; [redacted]
Cc: Claire Robbie
Subject: RE: Request for comment: Reform UK Ltd corporate restructure
Date: 20 February 2025 15:53:34

Thanks all, I'll send that off and let you know of any follow ups.

[redacted]

[redacted]

The Electoral Commission
[redacted]

From: Orla Hennessy [redacted]
Sent: 20 February 2025 3:52 PM
To: [redacted]; Laura Douglas [redacted]
Cc: Claire Robbie [redacted]
Subject: RE: Request for comment: Reform UK Ltd corporate restructure

Happy with that, thanks all

Orla

Orla Hennessy
Head of External Communications

From: [redacted]
Sent: 20 February 2025 3:43 PM
To: Laura Douglas [redacted]; Orla Hennessy [redacted]
Cc: Claire Robbie [redacted]
Subject: RE: Request for comment: Reform UK Ltd corporate restructure

Thanks Laura! Just looping in Orla.

Hi Orla, just checking if you're also happy with the below response for [redacted]

Thanks
[redacted]

//

[redacted] *was the registered treasurer of Reform UK, and was replaced by Chalton Edwards on 17 February 2025. The party informed us of this change of officer in line with their requirements under electoral law, and this change is now reflected on their party register entry.*

Party secretary is not a legal officer position to register under electoral law, and is therefore not a role reflected on our register.

Any company structure changes, including changes to company secretaries, from a regulatory perspective, would be a matter for Companies House and not the Electoral Commission. Our regulatory powers apply to enforcing the political finance laws.

[redacted]

The Electoral Commission
[redacted]

From: Laura Douglas [redacted]
Sent: 20 February 2025 3:37 PM
To: [redacted]>; [redacted]
[redacted]>
Cc: Claire Robbie [redacted]
Subject: RE: Request for comment: Reform UK Ltd corporate restructure

Works for me

Thank you, and sorry I wasn't able to get to this before 3pm.

Laura

Laura Douglas (she/her)
Head of Regulatory Support

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 20 February 2025 1:54 PM
To: [redacted]>
Cc: Laura Douglas [redacted]
Subject: Re: Request for comment: Reform UK Ltd corporate restructure

Hi [redacted],

Thanks for sending this over. I've had time to re-read the original query and think they've misunderstood what's actually happened in practice. Namely, that [redacted] resigned as *company secretary* according to companies house, and party *treasurer* (according to us).

Not to get into this is any press response, but we know the party have a separate party secretary, who is still fulfilling this role.

I've tried to clarify the matter with some lines below. I'm not sure it's really worth getting into their questions properly at this point, when the crux of why they think the party has done something wrong is based on a misunderstanding.

Copying Laura in so that she's across press queries on this matter. Laura - to note there's a 3pm deadline on this.

[redacted] *was the registered treasurer of Reform UK, and was replaced by Chalton Edwards on 17 February 2025. The party informed us of this change of officer in line with their requirements under electoral law, and this change is now reflected on their party register entry.*

Party secretary is not a legal officer position to register under electoral law, and is therefore not a role reflected on our register.

Any company structure changes, including changes to company secretaries, from a regulatory perspective, would be a matter for Companies House and not the Electoral Commission. Our regulatory powers apply to enforcing the political finance laws.

[redacted]

[redacted]

The Electoral Commission

[redacted]

[redacted]

From: [redacted]
Sent: Thursday, February 20, 2025 12:33
To: [redacted]
Subject: FW: Request for comment: Reform UK Ltd corporate restructure

Hi [redacted],

Thanks for sense checking this! I've added our previous lines below that we mentioned, but please do let me know if anything needs amending.

I think I mentioned but they've given us a 3pm deadline.

Thanks!

[redacted]

//

The constitution you shared below is no longer the current constitution, the party are no longer required to follow it. We can confirm that Reform UK submitted an updated constitution to the Commission in January 2025, alongside its renewal notification. We are currently considering the updates submitted.

Any company structure changes, from a regulatory perspective, would be a matter for Companies House and not the Electoral Commission. Our regulatory powers apply to enforcing the political finance laws.

If a party is in breach of its own constitution, unless its within our regulatory remit, it is typically a party matter. For information, a new treasurer formally registered this week [can we say who it is?]. A party has 14 days after a new treasurer is appointed to notify the Commission, and we can confirm we have received this notification. It may take time for our website to be updated, but I would suggest contacting Companies House about their processes.

[redacted]

[redacted]

The Electoral Commission
[redacted]

[redacted]

From: [redacted] **On Behalf Of** press official
Sent: 20 February 2025 11:06 AM
To: Press <press@electoralcommission.org.uk>
Subject: Request for comment: Reform UK Ltd corporate restructure

Dear Press Team,

I am getting in touch from [redacted] - we're a legal campaigning organisation.

We're working with a newspaper on an article about Reform Party UK Ltd's recent corporate restructure.

As part of this, we note that Reform UK's secretary, [redacted] has resigned as party secretary. However, according to Companies House records he has not been replaced.

Our understanding is that under its current constitution, as part of its board structure, Reform UK must have a secretary who is a qualified solicitor/ barrister.

For reference, please see p.19 of this FOI doc of the party constitution, which states:

"The Party Secretary must be a fully qualified Barrister or Solicitor with a current practising certificate. Should the Party Secretary be suspended from practice or have their practising certificate withdrawn for any reason, they shall immediately cease to be Party Secretary and the Board must appoint a new Party Secretary."

https://www.electoralcommission.org.uk/sites/default/files/2019-07/FOI%20027%2019%20Response.pdf

In light of Reform UK's failure to register a new secretary, would it be possible to **by 3pm this afternoon** to:

1) Get clarity/comment on whether it is the Electoral Commission's understanding that the constitution that the Brexit Party agreed with the EC on registration (and which Reform UK has since adopted) has now been violated?

2) And whether this could be a breach of electoral law?

My apologies for the short notice of this complex request.

Many thanks for your help,

[redacted]

--

[redacted]

[redacted]

Website: [redacted]

[redacted] holds power to account. We believe in people-powered justice and fight for a fairer, greener future.We're committed to protecting your privacy. Find out more about how we take care of your data in our privacy notices.

From: [redacted]
To:
Cc: Press
Subject: RE: Reform UK constitution
Date: 14 February 2025 15:31:30

Dear [redacted],

Thank you for contacting the Electoral Commission.

We can confirm that Reform UK submitted an updated constitution to the Commission in January 2025, alongside its renewal notification. We are currently considering the updates submitted.

Kind regards,

[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]
Sent: 14 February 2025 3:02 PM
To: Press <press@electoralcommission.org.uk>
Subject: Reform UK constitution

Hi,

I am writing up a story today on some comments I have from Michelle Ballantyne, the former Scottish leader of Reform UK, criticising the party for announcing a new constitution at its autumn conference but then not actually doing anything to register it. She says no details have appeared on the Electoral Commission website and no documents are pending.
Can I please just check if this is the case? Has the Electoral Commission received a new constitution from Reform UK?

Many thanks,

[redacted]

[redacted]

[redacted]

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From: [redacted]
To: [redacted]
Cc: [redacted]; Party Reg
Subject: Re: renewal of Party registration
Date: 20 January 2025 13:39:37

Dear [redacted]
Many thanks. I hope to see you before I leave.
Kindest regards
[redacted]

On Mon, 20 Jan 2025 at 13:36, [redacted]> wrote:

> Hi [redacted],
>
> Thank you for the information, I have copied in the party registration team so they are aware and can respond as necessary.
>
> Kind regards,
>
> [redacted]
>
> [redacted]
>
> **The Electoral Commission**
>
> [redacted]

From: [redacted]>
Sent: 20 January 2025 10:29 AM
To: [redacted]>; [redacted]
Subject: renewal of Party registration

Dear [redacted] and [redacted]

I want to complete the Party registration renewal as the new Constitution has been completed now and I can upload it.

However, I do not have the new company registration number and I intend to leave it blank; and as soon as the new number is available I can add it to the new Constitution.

Kind regards

[redacted]

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From: [redacted]
To:
Subject: Reform LLC/PLC wording
Date: 10 January 2025 16:02:01

Hi [redacted],

The FT got in touch last year and me and [redacted] put something together between the following two sets of wording:

Wording 1:

The Commission is in discussion with Reform UK about updating its constitution and will ensure that any document submitted to us is consistent with the law, as per our statutory duties. Under the Political Parties, Elections and Referendums Act 2000 (PPERA), a party must provide a constitution that sets out the structure and organisation of the party, and we have published guidance for parties on the topics we expect a constitution to include. The Commission's role extends so far as to determine whether the structure set out in any document is consistent with electoral law and allows the party to comply with various statutory requirements.

Parties may also be subject to other laws, such as company law, and have structures in place to meet these requirements. Our remit within this is to consider how any structures affect the ability of a party to meet the requirements under electoral law.
Regarding the party's change from a private limited company to a company limited by liability, from a regulatory perspective, this is a matter for Companies House and not the Electoral Commission.

Wording 2:
The Commission is in discussion with Reform UK about updating its constitution. We have not received an updated constitution from the party since their recent conference. Under the Political Parties, Elections and Referendums Act 2000 (PPERA), if a party has updated its constitution, it must submit constitution updates to the Commission by the time of its next annual renewal confirmation.

Parties may also be subject to other laws, such as company law, and have structures in place to meet these requirements. Regarding the party's change from a private limited company to a company limited by liability, from a regulatory perspective, this is a matter for Companies House and not the Electoral Commission.

Between the two of these, I hope you find something useful.

Kind regards,

[redacted]

The Electoral Commission

electoralcommission.org.uk

[redacted]

From: Party Reg
Sent: 19 September 2024 10:26
To: [redacted]
Cc: [redacted]
Subject: Reform UK - Confirmation of changes to registered details CCM:0594404

Dear [redacted]

Thank you for clarifying the various matters enquired after. Please keep us informed as to when the nominating officer position is eventually changed, and whether the party intends to amend its constitution. Where a party does amend its constitution, it is a requirement for said constitution to be submitted alongside the party's annual renewal for it to be considered compliant.

Your application to change the registered details for your party which we received on 17/09/2024 has now been processed. We have confirmed the following changes:

- HQ address changed from [redacted] to City Place

Please notify us immediately if the amended details do not appear as you had intended.

You must notify us **within 14 days** of changes to the named leader, treasurer, nominating officer, and campaigns officer or additional officer (if applicable) for the party if caused by the death or termination of the appointment of that officer. For other changes, such as changes to officer home addresses or the party's headquarters address, you must notify us **within 28 days**. Failing to update the party's registered details where they are not correct by the relevant deadline is a contravention of PPERA which may result in a fine. You can read our Enforcement Policy here.

Your party's annual confirmation of registered details

You are now able to update your party's confirmation of registered details. You can find instructions on how to do so here.

Kind regards,

[redacted]

The Electoral Commission
electoralcommission.org.uk

From: [redacted]@reformparty.uk>
Sent: 17 September 2024 3:55 PM
To: Party Reg <Partyreg@electoralcommission.org.uk>
Cc: [redacted]@electoralcommission.org.uk>; [redacted]@reformparty.uk>
Subject: sundry matters and RP3

Dear sirs

I refer to your email communication of 10/09/2024 and please note the following:

Registered office
Regarding the new Registered office of the Party, I attach form RP3 that provides the details of the new address. The reason for the delay in notifying you is due to the protracted time that the new registered office providers have been taking to complete their ID clearance of the officer (given there are two PEPs).
In fact, they still have not quite completed it yet, and there is just one tiny item of a proof of address left to be carried out. However, they confirmed to me on the phone today that we could use the new address from now on anyway.

Our previous address at [redacted] had to be changed because there was a huge protest outside their offices against the Reform UK party in early August and consequently the operators of that registered office terminated our contract and asked us to leave. With some difficulty we found the new address, and had to notify Companies House of the new address, however as I mentioned in the paragraph above, the formality of ID clearance has not been completed 100% yet.

NNO
As [redacted] the incumbent NNO has already confirmed to you separately in his email of 16th September, he is still in the post, and when he is replaced we will notify the Commission.

Northern Ireland application
We note your communication of today informing us about the rejection of the application, and my apologies for not having replied to your previous communication on the matter earlier.

The Constitution
I await confirmation from the Party leadership if there are any planned changes to the constitution and I will revert back to you if there are any changes to the Constitution as soon as I learn the decision of the leadership on this matter.

With kind regards

[redacted]

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Company number 11694875 | Registered in England and Wales

Promoted by Reform UK Party Limited

From: Party Reg
To: [redacted]
Cc: [redacted]
Subject: Reform UK - Confirmation of changes to registered details CCM:0594419
Date: 01 October 2024 12:43:01

Dear [redacted]

Thank you for your notification to change the registered details for your party which we received in person on 01 October 2024. We consider this a complete and compliant notification and have now processed the following changes:

Position	Outgoing officer	Incoming officer	Post/Home address	Email	Telephone
Nominating officer	[redacted]	Peter Charles George Durnell	[redacted]	[redacted]	[redacted]

These changes are in effect as of today, but please allow a day for this to be reflected on your public registered entry, as the website refreshes overnight.

Please notify us immediately if the amended details do not appear as you had intended.

You must notify us **within 14 days** of changes to the named leader, treasurer, nominating officer, and campaigns officer or additional officer (if applicable) for the party if caused by the death or termination of the appointment of that officer. For other changes, such as changes to officer home addresses or the party's headquarters address, you must notify us **within 28 days**. Failing to update the party's registered details where they are not correct by the relevant deadline is a contravention of PPERA which may result in a fine. You can read our Enforcement Policy here.

Your party's annual confirmation of registered details

You are now able to update your party's confirmation of registered details You can find instructions on how to do so here.

As noted in our meeting today, any renewal will need to be accompanied by a copy of the party's updated constitution to be compliant. We therefore recommend that when the party is in a position to submit its constitution to us, it does so alongside its annual renewal. To reiterate what was said in the meeting, the constitution does not need to eventually be deemed compliant for the renewal to remain valid, it just needs to be submitted.

Please don't hesitate to contact the Registration team at this address with any questions you might have, but please be aware we will not be able to guarantee any document's acceptability outside of a full formal assessment.

Please let me know if you have any further questions.

Kind regards,

[redacted]

The Electoral Commission
[redacted]

From: Party Reg
To: [redacted]
Cc: [redacted]
Subject: Reform UK - Confirmation of changes to registered details
Date: 17 February 2025 15:59:31

Dear Charlton Edwards,

Thank you for your notification to change the registered details for your party which we received on 17 February 2025. We consider this a complete and compliant notification and have now processed the following changes:

Position	Outgoing officer	Incoming officer	Post/Home address	Email	Telephone
Treasurer	[redacted]	Charlton Edwards	[redacted]	[redacted]	[redacted]

These changes are in effect as of today, but will not appear on your public registered entry until tomorrow.

Please notify us immediately if the amended details do not appear as you had intended.

You must notify us **within 14 days** of changes to the named leader, treasurer, nominating officer, and campaigns officer or additional officer (if applicable) for the party if caused by the death or termination of the appointment of that officer. For other changes, such as changes to officer home addresses or the party's headquarters address, you must notify us **within 28 days**. Failing to update the party's registered details where they are not correct by the relevant deadline is a contravention of PPERA which may result in a fine. You can read our Enforcement Policy here.

New treasurer

When a party changes its treasurer, it must update its financial scheme where necessary. Your party has previously used our template scheme in the past. This template has been updated to reflect the new reporting thresholds that were introduced in January 2024, so we would recommend filing a revised scheme as soon as possible to ensure the party documents are up to date and reflect these new thresholds. You can find instructions throughout on how to correctly edit the document to reflect the party's financial arrangements.

Please submit this within two weeks of the change of treasurer. You can view the scheme we currently have registered for your party via the 'View details' page of the parties PEF Online account.

Any time a party updates its scheme, we will consider whether it continues to meet the requirements of the law and will undertake a short assessment to determine this. You can find out more information about schemes in our guidance.

We provide guidance on the role of the treasurer and their responsibilities under the law. We also provide guidance on:

- Party statement of accounts
- Donations and loan reporting
- Maintaining/changing your party details and instructions for common changes via PEF Online, including party renewals

Your party's annual confirmation of registered details

We have now also processed the party's annual renewal notification which was submitted to us alongside the party's updated constitution on 20 January 2025.

Please note: We are continuing to assess the constitution and may get in contact requesting further details as part of this.

Please let me know if you have any further questions.

Kind regards,

[redacted]

[redacted]

From: [redacted]
To:
Subject: Reform UK - Respond now to remain a registered party
Date: 17 January 2025 16:50:58

Hi [redacted]

Please see below a draft of the final renewal reminder to Reform.

….

Dear [redacted]

I'm writing in regards to your party's annual renewal in order to remain on the political party register.

To remain a registered party, every year your party must:

- confirm your party's registered details are correct
- pay the £25 registration fee.

As the treasurer you are responsible in law for confirming your party's details are correct. Please be aware that the final deadline for your party's registration renewal is on **31 January 2025. If we do not receive a complete and compliant confirmation by the final deadline, we are required by law to remove your party from the register.**

I note that you been in contact with my colleagues about the changes to your party's constitution. Please be aware that these changes must be completed and submitted to the Commission in order for us to process your party's renewal.

If you are registered with PEF Online you should be able to complete, and pay for, your party's annual renewal confirmation online by clicking this link. You can find instructions on how to complete your renewal here.

Alternatively, you can also confirm your party's registered details by completing an RP8 form and returning it by post to our London office, along with a cheque or postal order for £25 made payable to the Electoral Commission.

If you have any questions on submitting the renewal application or your party's updated constitution, please do contact me.

My email is [redacted] and my phone number is [redacted]

Yours sincerely

[redacted]

The Electoral Commission

[redacted]

From: Laura Douglas
To: [redacted]
Subject: RE: Request for information to inform Reform briefing
Date: 27 March 2025 08:45:22
Attachments: image001.png

Don't worry [redacted]. If you can have everything in there by COP today, that would be really helpful.

Thank you

Laura

Laura Douglas (she/her)
Head of Regulatory Support

The Electoral Commission
[redacted]

From: [redacted]
Sent: 27 March 2025 8:41 AM
To: [redacted]
Cc: Laura Douglas [redacted]
Subject: Re: Request for information to inform Reform briefing

Hi [redacted],

I didn't get as far as adding in links to relevant constitution documents in this briefing document and I'm at this conference today. Would you mind adding in some links today?

Also grateful if you could flesh out the part on the exchange we had clarifying matters with the party (a brief summary of what we asked and what we said should be fine, along with linking the exchange for anyone that wants to read it in full).

Copying Laura in if you have any questions. Laura - apologies this wasn't all sorted yesterday.

Cheers,

[redacted]

[redacted]

The Electoral Commission

[redacted]

[redacted]

From: Laura Douglas [redacted]
Sent: 24 March 2025 16:26
To: [redacted]
Subject: Request for information to inform Reform briefing

Hi all,

Jackie and Vijay are now meeting with Reform's new treasurer, Charlton Edwards next Wednesday. (2 April)

To inform and shape the briefing, I would appreciate if you can provide some information/intel. This will also ensure we can get the strategic pitch/objectives correct.

I've set up this document, and marked in some comments some rough steers.

Can you please have a look and insert accordingly? Please do insert anything else you think relevant, even if just for background information.

If you could do so by COP Wednesday (26th) that would be great.

Thanks

Laura

Laura Douglas (she/her)
Head of Regulatory Support

The Electoral Commission
[redacted]

From: [redacted]
To:
Subject: Fw: Reform UK
Date: 03 July 2025 14:58:29

[redacted]

The Electoral Commission

[redacted]

From: [redacted]
Sent: 07 January 2025 14:34
To: Press <press@electoralcommission.org.uk>
Subject: Reform UK

Hello

Hope you're all well.

Can I check if you have received any application from Reform UK and/or Nigel Farage in relation to the Electoral Commission giving a green light to the reclassification of Reform UK?

Mr Farage has said today that paperwork was filed in early December with the Electoral commission.

Can I ask if that is the case and, if so, what is was the nature of the application?

[redacted]

[redacted]

[redacted]

From: Laura Douglas
To: [redacted]
Subject: RE: Review of Reform correspondence
Date: 14 March 2025 13:37:24
Attachments: image001.png

Hi [redacted],

Thanks for sharing, looks good. I made a few style tweaks but nothing substantial. I took out the reference to upcoming meeting, as it's looking to be w/c31 March and I imagine they will want to get this sorted. It was due to be next week but has had to move.

Good to go.

Laura

Laura Douglas (she/her)
Head of Regulatory Support

The Electoral Commission
[redacted]
electoralcommission.org.uk

From: [redacted]>
Sent: 13 March 2025 6:00 PM
To: Laura Douglas [redacted]>
Subject: Review of Reform correspondence

Hi Laura

Please see attached to the email the draft email to Reform [redacted] and I have been working on in regards to the matters of consideration of their constitution.

I've put the draft in a word document in case you want to make any adjustments or have comments before it is sent out. 2025-03-11 Reform UK constitution correspondence.docx

I've attached the draft as a copy as well in case the link (for whatever reason) doesn't work.

I've also attached the party's amended constitution, the Articles of Association and the party's Rulebook in case you wish to view them.

As [redacted] is on leave tomorrow, I'm able to send this out to the party tomorrow if you are happy with the contents. Otherwise, I can send a holding email to them in the meantime letting them know we will send out the matters of consideration early next week.

If you have any questions, please do get in touch.

Many thanks

[redacted]
[redacted]

The Electoral Commission
[redacted]
electoralcommission.org.uk

Extracts of information being disclosed for FOI 056-25

Description of information	Extract of Information
04 November 2024 - Extract from internal document (minutes of meeting with Reform UK)	• [redacted] explains that we have seen several imprint issues, and we are trying to figure out if the constitution and financial scheme are reflective of what is going on. [redacted] • [redacted] confirms that the renewal deadline for Reform is 31st January and thus we need to be sure by then that the constitution is up to date. • [redacted]confirms that Reform's renewal deadline is 31st January, and it must be submitted with the constitution because it has changed. • [redacted]explains that the process for renewal and the updated constitution are treated separately, so if there is an issue with the constitution this will not affect the status of the renewal. • [redacted]notes that[redacted], [redacted] with expertise on electoral law, is involved in the redrafting of the constitution. • [redacted]notes that[redacted] has been emailed about the constitution. • [redacted]explains that the party's renewal and constitution update is still outstanding.
7th January 2025 – Extract from internal email summarising public queries	Some reference to the potential delay to council elections and some Reform membership/constitution questions, but nothing jumping out at me as an issue for the webinars next week.