

[REDACTED]

From: FOI
Sent: 09 August 2017 14:42
To: [REDACTED]
Subject: FOI 120/17 Campaigner Communications Repsonse
Attachments: FW Re Notification of Third Party status Voter Consultancy Ltd CCM 0324539.pdf; FW Confirmation of registration CCM 0324538.pdf; FW Deadline for renewal CCM 0288260.pdf; FW RE Deadline for renewal CCM 0288260.pdf; FW RE Quarterly Pre-Poll Reporting - Reminder CCM 0243011.pdf; FW Re Quarterly Pre-Poll Reporting - Reminder CCM 0324541.pdf; FW RE Registered Third Party - Change of Address CCM 0324543.pdf; FW Voter Consultancy Ltd - Lapse of registration as a Third Party CCM 0389082.pdf; FW Voter Consultancy Ltd CCM 0324540.pdf; FW Voter Consultancy Ltd CCM 0324544.pdf; 2016-01-19-Voter Consultancy Ltd-Registration Confirmation Letter.pdf; 2015-10-21-Voter Consultancy Ltd-Renewal Reminder.pdf

Dear [REDACTED]

Our Ref: FOI 120/17

Thank you for your email to the Electoral Commission dated **19 July 2017**.

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

Your request is in bold below followed by our response.

You have requested:

I'd like to request any communications that the Electoral Commission had with Thomas Borwick or Voter Consultancy Ltd, a registered third party campaigner.

Our response is as follows:

We hold the information you have requested and are attached to this response. The Commission has applied redactions where appropriate, in line with the Data Protection Act 1998.

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

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: <http://www.electoralcommission.org.uk/about-us/freedom-of-information-requests/how-do-i-make-an-foi-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: <http://www.ico.gov.uk>

Yours sincerely,

[REDACTED]

Senior Information and Knowledge Adviser

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

FOI@electoralcommission.org.uk

electoralcommission.org.uk

yourvotematters.co.uk

[Twitter](#) | [Facebook](#) | [Blog](#)

Thomas Borwick
Voter Consultancy Ltd
Office 120
77 Victoria Street
London
SW1 0HW

21 October 2015

Dear Thomas,

Registration of Voter Consultancy Ltd as a non-party campaigner

I am writing to remind you that your registration with us as a non-party campaigner is due to lapse on 12 December 2015.

Registration as a non-party campaigner lasts for 15 months. In order to remain registered, you must submit a renewal **before 12 December 2015**. If you do not submit a renewal before this date, your registration will lapse.

If you intend to spend more than £10,000 on regulated campaign activity during the regulated period for the Scottish Parliamentary, National Assembly for Wales or Northern Ireland Assembly elections in 2016, you must ensure that you are registered with us. If you do not submit a renewal during the time frame above, you will need to make a new application to register before you spend more than £10,000 on regulated campaign activity during the regulated period for any of these elections.

The regulated period for all of these elections begins on 5 January 2016, and ends on 5 May 2016.

You can now change your registration details, renew your registration, and submit spending and donations returns online. If you already have a user account, you can log in to PEF Online to submit your renewal by following this link:

<https://pefonline.electoralcommission.org.uk>

The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

Tel: 020 7271 0500
Fax: 020 7271 0505
info@electoralcommission.org.uk
www.electoralcommission.org.uk

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If you do not currently have a PEF Online user account and would like to submit your renewal online, please contact us at pef@electoralcommission.org.uk, and we will create an account for you and provide further advice about submitting the renewal online.

Alternatively, you can renew your registration by completing a form - available on our website at the link below – and returning it to:

Party and Election Finance
3 Bunhill Row
London
EC1Y 8YZ

http://www.electoralcommission.org.uk/_data/assets/pdf_file/0005/169457/form-tp3-ukpge.pdf

We have also recently published our guidance for non-party campaigners campaigning at the May 2016. It is available on our website here:

<http://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/non-party-campaigners/2016-elections>

If you have any questions or require any assistance in renewing your registration, please do not hesitate to contact us on 0333 013 1928, or at pef@electoralcommission.org.uk

[Redacted]

[Redacted]

[Redacted]

Party and Election Finance

The Electoral Commission

The Electoral Commission

Mr T Borwick
Voter Consultancy Ltd
Office 120
77 Victoria Street
London
SW1 0HW

19 January 2016

Dear Mr Borwick

Approval of registration as a non-party campaigner

Thank you for your application to register as a non-party campaigner. Your application was received on 11 January 2016.

I write to confirm that Voter Consultancy Ltd has been added to the register of third parties. Your date of registration is 11 January 2016. You can view your register entry at the link below:

<http://search.electoralcommission.org.uk/English/Registrations/TP3928>

It is important that you notify us of any error in these details immediately so they can be amended as soon as possible.

Registration normally lasts for 15 months, after which point it may lapse. If you wish to continue your registration beyond this date, we must receive a completed TP3 renewal of registration form during the four months immediately prior to the end of your registration. It is your responsibility to ensure we receive any renewal before the end of your registration.

The Political Parties, Elections and Referendums Act 2000 imposes a number of requirements on non-party campaigners, particularly in relation to spending on regulated campaign activity. These rules help to ensure the integrity and transparency of the electoral system. If Voter Consultancy Ltd does not follow these rules both Voter

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The Electoral Commission

Consultancy Ltd and you as the responsible person may be committing a criminal offence.

You can find more information on how to comply with the rules in our guidance:

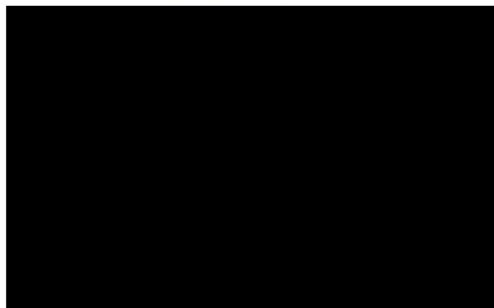
<http://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/non-party-campaigners>

You can now change your registration details, renew your registration, and submit spending and donations returns online. Register to use PEF Online and login at <https://pefonline.electoralcommission.org.uk>.

Please do not hesitate to contact us at the details below if you require any further assistance:

Party and Election Finance
The Electoral Commission
3 Bunhill Row, London EC1Y 8YZ
Tel: 020 7271 0616
Fax: 020 7271 0505
Email: pef@electoralcommission.org.uk

Yours sincerely



Party and Election Finance

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Dear Mr Borwick,
Please find your confirmation of registration as a non-party campaigner attached.
Please do not hesitate to get in contact if you have any questions.
Kind regards

[REDACTED]

The Electoral Commission
3 Bunhill Row
London, EC1Y 8YZ

[REDACTED]

www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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We welcome correspondence in Welsh and English

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We welcome correspondence in Welsh and English

[REDACTED]

[REDACTED]

Dear Electoral Commission

I am writing to confirm that Voter Consultancy Ltd has not spent any money on regulated campaign activity.

If you require any additional information, please do get in touch.

Kind regards,

Thomas Borwick

<http://VC-L.co.uk/>

Voter Consultancy Ltd

UK Registered Company at 1 Love Lane London EC2V 7JN

Company registration number 08656284

Phone: [REDACTED]

[REDACTED]

Dear [REDACTED]

Thank you for your email,

I would very much like to confirm we are actively working and demonstrating our services and have been meeting with candidate teams and donors in [REDACTED]

Our website is <http://vc-1.co.uk/> we will also registering for a VAT number and are looking forward to a very busy conference season!

Please let me know if you need any further information.

Kind regards,

Thomas Borwick
Director
VCL
1 Love Lane
London EC2V 7JN
[REDACTED]

On Wed, Sep 11, 2013 at 10:23 AM, [REDACTED] wrote:

> Dear Mr Borwick,

>

> Thank you for your recent application to register the above company as a third party.

>

> As you may be aware, companies that wish to register as third parties must meet the following criteria:

>

> - Be registered in the UK

> - Be incorporated in the EU

> - Be carrying on business in the UK

>

> I note from Companies House records that the Voter Consultancy Ltd is a UK registered company and incorporated in the UK, however I cannot find any evidence to suggest that the company is carrying on business in the UK. I am conscious that the company was only registered on 19 August 2013, meaning that no accounts are available. In addition, I could not find a company website or any further information about its activities.

>

> The fact that the company has only recently been registered is not necessarily a barrier to registration; however, in order for us to proceed with the registration, I would be grateful if you could provide some further information to demonstrate that the company is carrying on business in the UK.

>

> If you have any questions or would like to discuss, please let me know.

>

> Many thanks,

>

> [REDACTED]

>


> [REDACTED]

>

> Party and Election Finance

> The Electoral Commission

> 3 Bunhill Row

> London EC1Y 8YZ
> 
>
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>
> Make sure you are registered to vote<<http://www.aboutmyvote.co.uk/>>
> Follow us on Twitter<<http://twitter.com/ElectoralCommUK>>
>
> Putting Voters First
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>
>
>
>

[REDACTED]

[REDACTED]

Hi Thomas

I've set up an online account for you, you should have received an automatically generated email containing your password. The details are:

Name : Mr Thomas Borwick

Email : [REDACTED]

User name : [REDACTED]

You password will have gone to [REDACTED].

If you need any more assistance please contact me.

Regards

[REDACTED]
From: Thomas Borwick [REDACTED]

Sent: 07 January 2015 09:17

To: [REDACTED]

Subject: Re: Quarterly Pre-Poll Reporting - Reminder

Hello [REDACTED]

Please may I have the online access details for Voter Consultancy Ltd.

Kind regards,

Thomas

Thomas Borwick
Kanto Systems
1 Love Lane
London EC2V 7JN
[REDACTED]

On 6 January 2015 at 10:32, [REDACTED] wrote:

[REDACTED]

Dear Responsible Person

Why we are writing to you

As the responsible person for a registered non-party campaigner in the UK Parliamentary general election, you must submit pre-poll reports setting out all donations that you receive over a certain value given towards your regulated campaign activity. You must make these reports on a quarterly basis from the start of the regulated period until 30 March 2015; you must make weekly reports from that date on until polling day. The first quarterly pre-poll report is due on Saturday **17 January 2015**. You do not have to submit a

report if you do not receive any reportable donations during the relevant reporting period. This letter explains what you need to do and when you must do it.

What do you need to report for the quarterly reports?

The pre-poll reporting rules cover all donations that are given towards your regulated campaign spending even if you receive them before the start of the regulated period. Your quarterly reports must provide details of certain donations, and the total value of other donations, accepted or returned during the relevant reporting period. You must report donations over £7,500 or an aggregate of donations that you have accepted from a single source that add up to over £7,500.

You should read our [guidance](#) to understand what donations are covered and what information you need to include:

Donations to [non-party](#) campaigners

[UK Parliamentary general election 2015: Pre-poll reporting for non-party campaigners](#)

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

As the reporting deadline falls on a non-working day we suggest that you submit your return to us by the last working day before the reporting deadline.

When do you need to report?

You are required to submit quarterly reports up until the date of the dissolution of Parliament. You must submit pre-poll reports by the following dates:

Reporting period in which donations are received or loans entered into	Deadline for pre-poll reports
19 September 2014 -18 December 2014	17 January 2015
19 December -18 March 2015	17 April 2015
19 March - 30 March 2015	28 April 2015

These dates assume that Parliament will be dissolved on 30 March 2015. After the dissolution of Parliament you will be required to submit a weekly donation report. The deadlines for weekly reports are in our [guidance](#).

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

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

What happens if you do not submit on time?

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

Can We Help?

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

[Redacted]

[Redacted]

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

Yours sincerely

[Redacted]

Compliance
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

[Redacted]

www.electoralcommission.org.uk

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[REDACTED]

[REDACTED]

Hello [REDACTED]

Please may I have the online access details for Voter Consultancy Ltd.

Kind regards,
Thomas

Thomas Borwick
Kanto Systems
1 Love Lane
London EC2V 7JN
[REDACTED]

On 6 January 2015 at 10:32, [REDACTED] wrote:



Dear Responsible Person

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You should read our [guidance](#) to understand what donations are covered and what information you need to include:

Donations to [non](#)-party campaigners

[UK Parliamentary general election 2015: Pre-poll reporting for non-party campaigners](#)

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Can We Help?

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

- Stuart Langley: 020 7271 0644 or slangley@electoralcommission.org.uk
- Jack Percival: 020 7271 0567 or jpercival@electoralcommission.org.uk

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

Yours sincerely

[REDACTED]

[REDACTED]

The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

[REDACTED]

www.electoralcommission.org.uk

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[REDACTED]

[REDACTED]

Dear [REDACTED]

Thank you for notifying us of the change of registered address for Voter Consultancy Ltd.
We have now amended your register entry. You can view your profile [here](#). I would be grateful if you could check this carefully and notify us immediately if the amended details do not appear as you had intended.
Please also find attached a letter regarding your registration renewal.

Kind regards

[REDACTED]

The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

[REDACTED]

www.electoralcommission.org.uk

www.aboutmyvote.co.uk

Democracy matters

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From: [REDACTED]

Sent: 14 October 2015 15:59

To: PEF Inbox

Subject: Registered Third Party - Change of Address

Dear Sir/Madam,

We are a Registered Third Party called Voter Consultancy Ltd, reference number TP2153.

I wish to inform you of our change of registered address. Our new address is as follows:

Office 120,

77 Victoria Street,

Westminster, London,

SW1H 0HW

I have attached the relevant form, I hope this is satisfactory.

If there are any issues please let me know.

Kind regards,

Voter Consultancy Ltd.

<http://VC-L.co.uk/>

Voter Consultancy Ltd is a UK Registered Company at

Office 120, 77 Victoria street, Westminster, London, SW1H 0HW

Company registration number 08656284

Phone: [REDACTED]

[REDACTED]

Dear Thomas Borwick,

Removal of Voter Consultancy Ltd from the register of non-party campaigners

I am writing to inform you that Voter Consultancy Ltd's registration as a non-party campaigner has lapsed and accordingly Voter Consultancy Ltd has been removed from the register.

In order to remain registered, a non-party campaigner is required by law to submit a notification of renewal each year no earlier than one month prior to the anniversary of its original notification (which, for Voter Consultancy Ltd, was 11 January), and no later than three months after this date. This is unless the end of that period falls within a regulated period, under which circumstances different rules will apply. Given that the renewal deadline of 11 April 2017 fell within the regulated period for the 2017 UK Parliamentary general election, the notification deadline was extended to end of the regulated period which was 8 June.

We note that you submitted a notification of renewal on 19 June 2017. That notification came after the relevant deadline and is accordingly not effective.

As we did not receive a notification of renewal by the deadline this year, your non-party campaigner's registration has lapsed and has been removed from the register on 20 July 2017 (see s 88 of the Political Parties, Elections and Referendums Act 2000 (PPERA)). Accordingly, Voter Consultancy Ltd is no longer a recognised non-party campaigner for the purposes of PERA.

It is of course, open to Voter Consultancy Ltd to submit a new notification to apply to register as a non-party campaigner . Guidance for non-party campaigners can be found on our [website](#).

Please contact the Party Registration team on 0333 103 1928 or email partyreg@electoralcommission.org.uk if you have any questions.

Yours sincerely

[REDACTED]

The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

electoralcommission.org.uk

yourvotematters.co.uk

[Twitter](#) | [Facebook](#) | [Blog](#)

[REDACTED]

[REDACTED]

Dear Mr Borwick

Thank you for your submitting your renewal notification for Voter Consultancy Ltd on December 3rd.

I write to confirm that Voter Consultancy Ltd's entry on the register of third parties has been renewed.

Your registration will remain in force until 12 December 2015. If you wish to continue your registration beyond this date, we must receive a completed TP3 renewal of registration form during the four months immediately prior to this date. It is your responsibility to ensure we receive any renewal before the end of your registration.

Please do not hesitate to contact us if you require any further assistance.

Kind regards

[REDACTED]

Party and Election Finance
The Electoral Commission
3 Bunhill Row
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[REDACTED]

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[REDACTED]

[REDACTED]

Dear Mr Borwick

Thank you for your submitting your renewal notification for Voter Consultancy Ltd on December 3rd.

I write to confirm that Voter Consultancy Ltd's entry on the register of third parties has been renewed.

Your registration will remain in force until 12 December 2015. If you wish to continue your registration beyond this date, we must receive a completed TP3 renewal of registration form during the four months immediately prior to this date. It is your responsibility to ensure we receive any renewal before the end of your registration.

Please do not hesitate to contact us if you require any further assistance.

Kind regards

[REDACTED]

Party and Election Finance
The Electoral Commission
3 Bunhill Row
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[REDACTED]

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