

[REDACTED]

From: FOI
Sent: 01 February 2018 17:01
To: [REDACTED]
Cc: FOI
Subject: FOI 004/18 Details of Scotland in Union - Response
Attachments: Internal correspondance REDACTED.pdf; 2015-16 correspondance with SIU REDACTED.pdf; 2017-18 correspondance with SIU REDACTED.pdf

Dear [REDACTED]

Our Ref: FOI 004/18

Thank you for your email to the Electoral Commission dated **07 January 2018**, received by the Commission on **08 January 2018**.

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.

Please supply all items of information held by the Electoral Commission in relation to Scotland in Union.

<http://search.electoralcommission.org.uk/English/Registrations/TP6513>

This group has declared spending at the 2015 and 2017 general elections and 2016 Scottish election.

<http://bit.ly/2m5foMr>

The information should include, but not be limited to, all paperwork filed with the Commission which is not already available through PEF Online, all correspondence between the Commission and Scotland in Union or its agents, and all complaints lodged in respect of Scotland in Union.

In order to fulfil this request as cheaply and efficiently as possible, it is suggested that copies of original files are released in PDF format.

I understand there may be a charge for this information.

Our response is as follows:

We hold the information you have requested and it is contained in the attached documentation.

An e-mail on 6 June 2017 between Commission staff and Scotland in Union references a meeting which took place between the Commission and Scotland in Union on 19 June 2017. The purpose of the meeting was to discuss reporting requirements for non-party campaigners at the 2017 UK Parliament election. A handwritten note was made of the meeting, however, this has not been retained.

You will note that in an internal e-mail dated 5 January 2018, the Electoral Commission's Senior Financial Reporting Adviser raised concerns that Scotland in Union may potentially have exceeded the spending limit at the June 2017 UK Parliament election. This issue has now been assessed by the Commission and - given that the unexpected nature of the election meant that the spending rules applied retrospectively and taking into account Scotland in Union's prompt steps to register with us, and the fact that they desisted from further campaigning after the election was called - we have concluded that it would not be appropriate or proportionate for us to take any enforcement action in this regard.

You will also note that in an internal e-mail dated 5 January 2018, the Electoral Commission's Senior Financial Reporting Adviser raised concerns that Scotland in Union may potentially have exceeded the spending limit at the June 2017 UK Parliament election. This issue has now been assessed by the Commission and - given that the unexpected nature of the election meant that the spending rules applied retrospectively and taking into account Scotland in Union's prompt steps to register with us, and the fact that they desisted from further campaigning after the election was called - we have concluded that it would not be appropriate or proportionate for us to take any enforcement action in this regard.

Complaints lodged in respect of Scotland in Union

The Electoral Commission has received one complaint in relation to Scotland in Union details of which are already in the public domain: <https://wingsoverscotland.com/a-request-for-clarification/#more-100696>

Please note, some of the information contained in the attachments to this response is personal data such as the names, and contact details of junior staff at the Electoral Commission and Scotland in Union which is exempt under section 40 of the FOI Act. These documents have been redacted prior to release. Further explanation of the section 40 exemption is provided below.

Section 40(2) and (3)(a)(i) of the FOI Act

Section 40(2) provides for an exemption where the information requested constitutes personal data as defined by the Data Protection Act 2000 (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 section 1 of the DPA because the information relates directly to an identifiable living individual. Release of this information would breach the first data protection principle, which states the information must be processed fairly and lawfully.

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: <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: <https://ico.org.uk/>.

Yours sincerely,



Information Management Adviser

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

electoralcommission.org.uk

yourvotematters.co.uk

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E-mail

RE: Scotland in Union...

Sent Date 27/04/2017 10:00

E-mail

From: [redacted] Cc:
To: [redacted] Bcc:
Subject: RE: Scotland in Union expenses

Hi [redacted]

Yes, feel free to add it to the RIG agenda, and I'll have a look at the text as well.

It would be great if you could both have an initial look, and we will have a discussion about the impact of the message of the campaign in this office, and perhaps we could have a quick meeting about it tomorrow or Monday?

[redacted]

From: [redacted]
Sent: 26 April 2017 14:59
To: [redacted]
Subject: FW: Scotland in Union expenses

Thanks [redacted]

This will take a bit of thinking through. I will add it to the RIG issues log – perhaps I'll tell you when I've done so and you can check I've represented it correctly.

Since whether or not it will count as non-party campaigner spending is dependent on the political situation in Scotland I'm guessing the steer will have to come from you to a large extent – perhaps me you and [redacted] and anyone else you think ought to come should get together to talk about it.

Forwarding to [redacted] too so she can take a look.

Thanks,

[redacted]

From: [redacted]
Sent: 25 April 2017 15:40
To: [redacted]
Subject: FW: Scotland in Union expenses

Attached is the email from Scotland in Union that I received today.

From: [REDACTED]
Sent: 25 April 2017 15:28
To: [REDACTED]
Subject: FW: Scotland in Union expenses

Hi [REDACTED]

As discussed. The email below lists the activities undertaken by Scotland in Union since June last year.

The main activities undertaken in the lead up to the council elections are:
Leaflets (200,000) – delivered to some households on 22 March
<http://skynet/dm/Functions/ta/Comms/ScotlandinUnion.zip> (has both a copy of the newspaper article and leaflet)
Report – March 2017 <http://www.scotlandinunion.co.uk/factbook>
Newspaper article – 18 April 2017
<https://twitter.com/scotlandinunion/status/854210372575924224>
Scotland wide day of campaigning 15 March 2017

This is the statement that they will not be doing any campaigning for the LGE and the UKPGE. http://www.scotlandinunion.co.uk/election_statement

The other activities have been monitored on SIU's twitter:
<https://twitter.com/scotlandinunion> and facebook page:
<https://www.facebook.com/scotlandinunion>

From: [REDACTED]
Sent: 25 April 2017 14:47
To: [REDACTED]
Subject: Scotland in Union expenses

Looking at the expenses that SiU have incurred in the year run-up to the UKPGE:
Multiple sign up/action days (at least 11 overall in St. Andrews, Glasgow, Kirckaldy, Edinburgh, Dundee and Edinburgh)
11th Nov - "The Global Economy, Business and the Union: A Conversation with Jack Perry" - The Marquee, Royal Exchange Square, Glasgow
Quebec Neverendum? Lecture
Scotland and UK flag badged Billboard
"No more referendum" boards and signs - some red and some blue lettering.
'Change the Record' billboard
SiU christmas projections on Stirling Castle, Glasgow Science Centre, Forth Rail Bridge, Finnieston Crance, Perth Bridge, Tay Bridge and Arthur's Seat
Party Conference leaflet
Leaflets from 9th Feb
Scotland spoke earplugs
#Projectlisten event
200,000 leaflets - "Referendumb"
Day of Campaigning across Scotland for Referendumb
Merchandise

"NO to another referendum. YES to a united Scotland" signs

13 Youtube videos

SiU factbook

Page advert in the Herald - 18th April

<http://skynet/dm/Functions/ta/Comms/Scotland%20Office/Scotland%20in%20union%20advert%201.pdf>

<http://skynet/dm/Functions/ta/Comms/Scotland%20Office/Scotland%20in%20union%20advert%202.pdf>

<http://skynet/dm/Functions/ta/Comms/Scotland%20Office/Scotland%20in%20union%20leaflet%201.pdf>

<http://skynet/dm/Functions/ta/Comms/Scotland%20Office/Scotland%20in%20union%20leaflet%202.pdf>

<https://twitter.com/scotlandinunion>



Elections Officer

The Electoral Commission

Lothian Chambers

59-63 George IV Bridge

Edinburgh EH11RN

Tel:

Fax:

electoralcommission.org.uk

yourvotematters.co.uk

 EC Scotland Email signature - voter info

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Regarding  2017-04-25 Campaign activities by Scotland in Union

Owner  

Keywords

Duration Priority Normal

Due

Category Sub-Category

PEF Directorate Categories

Mette Christensen

From: Mathias Rosengren
Sent: 07 November 2017 17:54
To: [REDACTED]
Cc: John Franks
Subject: RE: UKPGE referrals

Thanks [REDACTED]

From: [REDACTED]
Sent: 07 November 2017 17:53
To: Mathias Rosengren; [REDACTED]
Cc: John Franks
Subject: RE: UKPGE referrals

These have all been assigned apart from CPA, which I have drafted and will be assigned to [REDACTED] as soon as [REDACTED] has completed the compliance checklist first thing.

From: Mathias Rosengren
Sent: 07 November 2017 10:50
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: UKPGE referrals

Importance: High

Hi both

I've had a very quick discussion with [REDACTED] just now, and we have whittled down the list of assessments to below cases.

After discussing it further with [REDACTED], we agreed that the following allocation seems fair:

1. [REDACTED]
- [REDACTED]
- [REDACTED]
2. [REDACTED]
- [REDACTED]
- **Scotland in Union (no donations return)**
- [REDACTED]
- [REDACTED]

[REDACTED]

Many thanks
Mathias Rosengren
Enforcement Manager
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: [REDACTED]
electoralcommission.org.uk
yourvotematters.co.uk
Twitter | Facebook | Blog

From: [REDACTED]
Sent: 06 November 2017 16:27
To: Mathias Rosengren

Cc: [REDACTED]

Subject: UKPGE referrals

Hi Mathias,

[REDACTED] and I have discussed this afternoon, and in addition to the ones we referred last month, we are intending to refer the following campaigners to you for assessment. I wanted you to have the list this afternoon, and I will go ahead and make the cases with full details tomorrow.

Bold = NPCs, other = parties

[REDACTED]

- **Scotland in Union (no donations return)**

[REDACTED]

Thanks,

[REDACTED]

Senior Financial Reporting Adviser

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

[REDACTED]

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[REDACTED]

From: [REDACTED]
Sent: 13 November 2017 12:12
To: John Franks
Cc: Mathias Rosengren
Subject: Compliance referral - A063004 - Scotland in Union - missing donations return

John,
I'm referring this matter to you to be dealt with as a compliance matter.

You'll see from the assessment ([FTT A063004 - Scotland in Union - missing donations return-UKPGE 2017](#)) that albeit there is evidence of breach, we concluded it was not proportionate or in the public interest for the Commission to open an investigation in view of the particular circumstances of the case.

[REDACTED]

Mette Christensen

From: Louise Edwards
Sent: 08 January 2018 09:49
To: [REDACTED]
Cc: Mathias Rosengren; John Franks
Subject: RE: Referral: Scotland in Union

Hi [REDACTED]
I'm aware that there were developments. Frustratingly I'm in back to back meetings for most of the day but I will come and find you in the gaps to discuss this. In the first instance re the donation return could you please dig out the assessment for me (or ask whoever did the assessment to send me a link)?

Thanks
Louise

From: [REDACTED]
Sent: 05 January 2018 12:24
To: Louise Edwards
Cc: Mathias Rosengren; John Franks
Subject: Referral: Scotland in Union
Importance: High

Hi Louise,

I am referring to you, in Mathias' absence, **Scotland in Union** who it appears may have overspent the Scotland limit for non-party campaigners at the 2017 UKPGE. The spending limit for NPCs in Scotland was £55,400, and they have reported £73,818.

We also previously referred them for not completing a donations return, and it was decided to take no further action at assessment stage. Should this be reconsidered alongside this matter?

I will create a CCM case on this now, if you can let me know who to assign this to.

Kind regards,

[REDACTED]
Senior Financial Reporting Adviser

The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

[REDACTED]
electoralcommission.org.uk
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E-mail

Letter of approval CC...

Sent Date 12/02/2015 16:28

E-mail

From



Cc

To

SIU Info

Bcc

Subject

Letter of approval CCM:0256421

Dear Mr Cameron

Please find attached a letter to you from Andy O'Neill regarding your application to become a registered third party for the UK Parliamentary General Election.

If you have any questions about the content of the letter, do not hesitate to contact me.

The Compliance team asked me to forward you the following message as well:

cid:image001.png@01D02908.8E5385E0

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. 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 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:

-
-



Alternatively you can contact our Party & Election finance advice line on [redacted] or email pef@electoralcommission.org.uk

Regarding  Scotland In Union

Owner 

Keywords

Duration Priority Normal

Due

Category Sub-Category

PEF Directorate Categories

PEF Parent Category PEF Category

Attachments

E-Mail Attachments Activity Attachment Associated View		
<input type="checkbox"/> File Name	<u>File Size (Bytes)</u>	
<input type="checkbox"/> image002.png	7,011	
<input type="checkbox"/> Scotland in Union letter of approval.pdf	199,572	
1 - 2 of 2 (0 selected)		
Page 1		

Status Reason Sent

The Electoral Commission

Mr Alastair Cameron
Scotland in Union
272 Bath Street
Glasgow
G2 4JR

12 February 2015

Non-Party Campaigner Reference: **RTP1497805**

Dear Mr Cameron,

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 26 January 2015.

I write to confirm that Scotland in Union has been added to the register of third parties. Your date of registration is 26 January 2015. I enclose a copy of Scotland in Union's entry as it appears on the register. 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 Scotland in Union does not follow these rules both the organisation 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>

The Electoral Commission
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Tel: 0131 225 0200
Fax: 0131 225 0205
infoscotland@electoralcommission.org.uk

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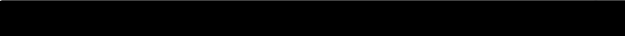


The Electoral Commission

In particular, I draw your attention to the rules on imprints for non-party campaigners. Whenever election material is produced, it must contain certain details (which we refer to as an 'imprint') to show who is responsible for the production of the material. This helps to ensure there is transparency about who is campaigning. Our guidance on imprints sets out what you must include and is available on our website at the address above.

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:


Referendum Officer
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh, EH1 1RN
Tel: 
Email: 

Kind regards


Andy O'Neill
Head of Office - Scotland

Dear Mr Cameron,

Thank you for your email.

The name and address that should appear in the imprint is the name and address of whoever in fact printed out the material.

If a leaflet is designed to be printed out at home, then you should leave a space for the person who prints the leaflet to add their details. For example:

"Printed by _____ of _____ (please fill in as applicable).

Promoted by Alastair Cameron of Scotland In Union, both of 272 Bath Street, Glasgow, G2 4JR."

I trust this is helpful. Please get back in touch if you have any further questions.

Kind regards,

[REDACTED]

Guidance Adviser
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: [REDACTED]
Fax: [REDACTED]
www.electoralcommission.org.uk

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P Please consider the environment before printing this email

From: Alastair Cameron [REDACTED]
Sent: 30 March 2015 21:25
To: PEF Inbox
Subject: Re: Non-party campaigner guidance

Dear Sir/ Madam

Having read the fact sheet on imprints, I have a further question on imprints, with which I hope you can help:

If we produce a leaflet design, but our supporters then download it and print their own (e.g. on their own home printers), can we even do that, and what do we do about the imprint wording? I was imagining that perhaps we might be able to put something like:

'Printed locally by individuals. Promoted by Alastair Cameron of Scotland In Union, both of 272 Bath Street, Glasgow, G2 4JR.'

I am of course very keen that we don't fall foul of any regulations in this regard, so please could you let me know what to do in this situation (and indeed whether we can do it at all!).

Many thanks
Alastair Cameron

On Fri, Feb 6, 2015 at 10:34 AM, PEF Inbox <PEF@electoralcommission.org.uk> wrote:
Dear Mr Cameron

Further to our telephone conversation, please see this [factsheet](#) on imprints.

I hope the above is helpful to you. If you do have any further questions, please do not hesitate to contact the party and election finance advice line on [REDACTED] or e-mail the party and election finance inbox at pef@electoralcommission.org.uk.

Kind regards

[REDACTED]
Guidance Advisor
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

Please consider the environment before printing this email.

--
Alastair Cameron

Dear Mr Cameron,

Thank you for your email.

1. Yes, the weekly pre-reporting for non-party campaigners are for donations only. You must report your campaign spending to us after the election. If your campaign expenditure is £250k or below, the report is due within 3 months of the election. If your campaign expenditure is over £250k, the report is due within 6 months of the election. Further information on the post-poll return can be found in our [guidance](#). The table below sets out the deadline dates for the weekly **pre-poll** donation reports before the 2015 election.

Reporting period	Deadline for pre-poll report
30 March 2015 – 5 April 2015	12 April 2015
6 April 2015 – 12 April 2015	19 April 2015
13 April 2015 – 19 April 2015	26 April 2015
20 April 2015 – 26 April 2015	3 May 2015
27 April 2015 – 3 May 2015	10 May 2015
4 May 2015 – 7 May 2015 (shorter than 7 days)	14 May 2015

2. Registered third parties are not required to submit a nil return as long as they did not receive any reportable donations during the regulatory period. If you do not provide a donation return, this assumes that Scotland in Union did not receive reportable donations.

I hope the above is helpful to you. If you have any further questions, please do not hesitate to contact the party and election finance advice line on [REDACTED] or e-mail the party and election finance inbox at pef@electoralcommission.org.uk.

Kind regards

[REDACTED]
Guidance Adviser

Party and Election Finance

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

Tel: [REDACTED]

Fax [REDACTED]

www.electoralcommission.org.uk

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Putting Voters First

P Please consider the environment before printing this email.

From: Alastair Cameron [REDACTED]

Sent: 04 April 2015 19:49

To: PEF Inbox

Subject: Re: Scotland In Union - income and expenditure reporting

Hello again (sorry, more questions!)

Having established as below that we only need to declare donations if they are specifically for our electoral campaigning; and that we should declare all our expenditure on electoral campaigning, I was about to fill in our first return on PEF Online, but now I just need to check a couple of things again, please!

1. For the quarterly and weekly returns, are they only for donations, and not for expenditure? I thought they would be for both, but the way PEF is configured it appears that they are only for donations, and the expenditure is just a single report within three months of 7th May - is that correct?

2. How do I submit a 'nil return' for donations? All of our donations so far have been to the organisation, with no strings attached, so thus far we have no donations which we would need to declare. However, I don't want to fail to report, so I was assuming I would submit a return but with a total sum of zero - should I be doing something like that, and if so how, please?

I hope those questions make sense and are easy to answer by email. If not, do please give me a call on [REDACTED]

Many thanks
Alastair Cameron

On Fri, Mar 20, 2015 at 11:41 PM, Alastair Cameron [REDACTED] wrote:

Thank you very much; that is very helpful (as always) - and thanks for the prompt response, too.
Regards
Alastair

On Fri, Mar 20, 2015 at 11:37 AM, PEF Inbox [REDACTED] wrote:
Dear Mr Cameron,

Thank you for your email.

1. A) A donation is money, goods, property, or services with a value over £500 given towards regulated campaign spending. A donation received by Scotland In Union that is not given for the purpose of and used for regulated activity is not regulated by the Electoral Commission.

B) When you receive any donation of more than £500 for regulated campaign activities, you must immediately make sure that you know who the donor is and that the donation is from a permissible source. In the case of individual donors, they must be on the electoral register to be permissible. Information for checking permissibility can be found in section 6 of our [guidance](#).

2. A) In all cases you should make an honest assessment, based on the facts, to whether the activity can reasonably be seen as regarded to influence voters to vote for or

against one or more political parties or a category of candidates. Further information on applying the purpose test can be found in section 6 of our [guidance](#). Campaign activity must directed at the public to be regulated. Please see pages 7-8 for more details on the public test.

The Electoral Commission does not designate specific staff for each stakeholder. If you have any further questions, please do not hesitate to contact the party and election finance advice line on [REDACTED] or e-mail the party and election finance inbox at pef@electoralcommission.org.uk.

Kind regards

[REDACTED]
Guidance Adviser
 Party and Election Finance
 The Electoral Commission
 3 Bunhill Row
 London EC1Y 8YZ
 Tel: [REDACTED]
 Fax: [REDACTED]
www.electoralcommission.org.uk

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Putting Voters First

P Please consider the environment before printing this email.

From: Alastair Cameron [REDACTED]
Sent: 19 March 2015 21:22
To: PEF Inbox
Subject: Scotland In Union - income and expenditure reporting

Sir/ Madam

We in Scotland In Union have just launched, and we have a few questions to confirm previous conversations and to make sure we stay on the right side of the regulations. I hope you can help - please let me know if we should be directing our enquiries to a specific person.

1. Income.

a. Before we set up, I spoke a few times with members of your team (who were very helpful) to confirm that as we have long-term aims not related to the election, we could accept donations without them being regulated, as long as those donations are not specifically for the election campaign. The analogy your staff gave was a trade union or pressure group, which would have some regulated and some unregulated expenditure. Could you please just confirm that this understanding is correct, i.e. we don't have to report income unless it's specifically for the election?

b. Regardless of point a, I presume we have a duty to check where donations come from. Do we still have to check that people are on the electoral roll, and if so do we have to do that ourselves?

2. Expenditure

In line with 1a, above, I gathered from your staff that we should make a judgement as to which expenditure, under your 'purpose test' counts as regulated. I just wanted to check that our understanding is correct, i.e. that we should judge (erring on the side of caution, and reporting if in doubt), what to report?

Finally, is there a person who is our 'account manager' or similar, whom we should be contacting, or do we just use this email address for future questions?

Thank you very much - I hope that all makes sense, and will look forward to hearing from you soon

Yours faithfully
Alastair Cameron

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Alastair Cameron
Scotland In Union


Scotland In Union is registered in Scotland, Number 492324.

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Alastair Cameron
Scotland In Union


www.scotlandinunion.co.uk

Scotland In Union is registered in Scotland, Number 492324.

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Alastair Cameron
Scotland In Union


www.scotlandinunion.co.uk

Scotland In Union is registered in Scotland, Number 492324.

Dear Mr Cameron

Apologies as I thought your group was registered for the referendum.

The answer is actually the same for non-party campaigners – any donation below £500 is not subject to the donations rules so you do not need to report it.

I hope the above is helpful to you. If you do have any further questions, please do not hesitate to contact us [REDACTED] or e-mail the party and election finance inbox at pef@electoralcommission.org.uk.

Kind regards

[REDACTED]
Guidance Advisor
The Electoral Commission
3 Bunhill Row
London
EC1Y 8YZ
Tel: [REDACTED]
Fax [REDACTED]
www.electoralcommission.org.uk
www.aboutmyvote.co.uk

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^ We welcome correspondence in Welsh and English

 Please consider the environment before printing this email.

From: Alastair Cameron [REDACTED]
Sent: 15 May 2015 13:21
To: PEF Inbox
Subject: RE: Additional item to report

Thanks for your prompt response.

Could I please just check one thing? Your note below says 'referendum campaigners', but my question was about the general election. Is it the same rule which applies?

Thanks
Alastair

On 15 May 2015 13:10, "PEF Inbox" [REDACTED] wrote:
Dear Mr Cameron

Thank you for your enquiry.

Donations to registered referendum campaigners over £500 must be checked for permissibility and reported to the Electoral Commission if over £7,500.

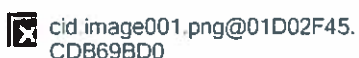
As the donation you mention is below £500, it is not legally considered a donation and is not subject to the donation rules. You therefore do not need to report it to the Electoral Commission.

I hope the above is helpful to you. If you do have any further questions, please do not hesitate to contact us on [REDACTED] or e-mail the party and election finance inbox at pef@electoralcommission.org.uk.

Kind regards

[REDACTED]
Guidance Advisor
The Electoral Commission
3 Bunhill Row
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' We welcome correspondence in Welsh and English

Please consider the environment before printing this email.

From: Alastair Cameron [REDACTED]
Sent: 15 May 2015 13:00

To: PEF Inbox

Subject: Additional item to report

Hello

Scotland In Union is a registered non-party campaigner for the recent UK general election.

We recently completed our (only) weekly donations report, but I have just realised that we should probably also have included a donation in kind of approximately £50, as one of our volunteers sent bundles of leaflets for us and does not want to be reimbursed.

Please could you let me know (1) whether we need to declare this (2) if so, how we can do so now that we are beyond the reporting date and already submitted our return?


Many thanks
Alastair Cameron

E-mail

RE: Electoral Commis...

Sent Date 01/07/2015 16:34


E-mail

From  PEF Inbox **Cc**
To  Alastair Cameron **Bcc**
Subject RE: Electoral Commission enquiry


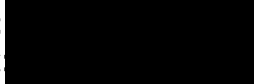
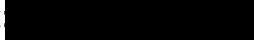
Dear Mr Cameron,

Thank you for your email.

For the Scottish Parliamentary election, the regulated period for non-party campaigners will be the 6 January 2016, four months before the poll. Further information and guidance will be available in October 2015.

I hope the above is helpful to you. If you have any further questions, please do not hesitate to contact the party and election finance advice line on  or e-mail the party and election finance inbox at pef@electoralcommission.org.uk.

Kind regards


Guidance Adviser
Party and Election Finance
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 
Fax 
www.electoralcommission.org.uk

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P Please consider the environment before printing this email.

From: [REDACTED]
Sent: 30 June 2015 21:54
To: info_inbox
Subject: New contact form submission

Your name: Alastair Cameron
Your email: [REDACTED]
Your telephone number: [REDACTED]
Your region/country: Scotland
I am a...: a member of a registered third party
Comment/enquiry type: candidate/party spending/funding

Comments:
 Hello Scotland In Union will probably be spending on regulated activity during the restricted period for the 2016 Scottish Parliament election. Please could you let me know when the restricted period will start - or if not yet decided, at what point will we know the dates of the restricted period? Many thanks Alastair Cameron

Eich Enw:
Eich e-bost:
Eich rhif ffôn:
Eich rhanbarth/gwlad:

Regarding  2015-07-01 - Alastair Cameron - Third party campaigning

Owner [REDACTED]

Keywords

Duration **Priority** Normal

Due

Category **Sub-Category**

PEF Directorate Categories

PEF Parent Category **PEF Category**

Attachments

E-Mail Attachments Activity Attachment Associated View	
<input type="checkbox"/> <u>File Name</u>	<u>File Size (Bytes)</u>
No E-Mail Attachment records are available in this view.	
0 - 0 of 0 (0 selected)	

Thank you, [REDACTED]

We had no donations over £7,500. I was led to believe we therefore didn't need to complete a nil return, so please let me know if we do need to.

Regards
Alastair

On 27 Jul 2015 11:51, [REDACTED] wrote:

Dear Mr Cameron

Thank you for your campaign expenditure return which we received on 10/06/2015.

I have noted that we are yet to receive your post-poll donations return. As you have reported campaign expenditure you must submit this to us by 7 August 2015. If you have received no donations over the £7,500 reporting threshold then this will be a 'nil' return.

If you have any questions then please contact me using the contact information below.

[REDACTED]
Compliance
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

Tel: [REDACTED]
Fax [REDACTED]

www.electoralcommission.org.uk

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Please consider the environment before printing this email


E-mail

RE: Staff costs

Sent Date 13/08/2015 18:11

E-mail

From  Alastair Cameron **Cc**

To  PEF Inbox **Bcc**

Subject RE: Staff costs

Dear 

Thank you very much for this - it's clear, detailed and very helpful.

We will obviously need to do some maths to make sure we report appropriately, but at least we understand how to do that!

And yes, you are correct in assuming I was asking about 2016 Holyrood election in particular.

Many thanks
Alastair

On 13 Aug 2015 09:07, "PEF Inbox"  wrote:

Dear Mr Cameron,

Thank you for your email.

As you know, spending on a campaign activity is regulated if the activity passes two tests: the purpose test and the public test. The purpose test is met if the activity can reasonably be seen as intended to influence voters to vote for or against one or more political parties or category of candidates (see Overview of regulated non-party campaigning pages 5-6). The public test is met if the activity is directed at the public. Your members and committed supporters do not count as the public (see pages 7-8).

The regulated period for the general election to the Scottish Parliament will begin in January. We will be publishing guidance specifically for campaigners in that election on our website in the autumn.

Question 1:

The costs of any staff time that is spent on regulated campaign activity will count towards your organisation's regulated spending total. In many cases this amount will be difficult to judge exactly, in which case you should make an honest and reasonable assessment of the amount that needs to be counted. In your spending return you do not need to report the staff costs for each particular activity, but rather one total of all of your staff costs on regulated activity over the whole regulated period.

I will give some examples of splitting spending below:

- **Supporters' newsletter** – Any material which is distributed only to your members or committed supporters will not be a regulated campaign activity, since it will not meet the public test. If you send the newsletter to a mailing list, and you know that 80% of the people on the list are your members or committed supporters, then (assuming that the newsletter meets the purpose test) you should include 20% of the staff time spent on the newsletter towards your regulated spending total.

- **Maintaining a website** – A website will usually meet the public test. Suppose you decide that 60% of the content of the website also meets the purpose test. You have a member of staff employed from the beginning of September to the beginning of May, so that 4 months are before the regulated period and 4 months are in it, and they spend 10% of their time maintaining the website. You should therefore include 3% of their salary over those 8 months as regulated spending:

$$60\% \text{ (purpose test)} \times 50\% \text{ (regulated period)} \times 10\% \text{ (proportion of time)} = 3\%$$

- **Fundraising** – Fundraising is not in itself one of the 5 types of regulated activity (see page 4 of Overview of regulated non-party campaigning), and therefore money spent on fundraising will not usually be regulated. It will only be regulated if it is also one of the 5 types of regulated activity.

For example, if you run a fundraising campaign in a regulated period, 15% of which is effectively election material which meets the purpose and public tests, then you should include 15% of the campaign's staff costs towards your regulated spending total. This is in addition to the costs of the election material itself.

Question 2:

Registered non-party campaigners must report any donations of over £7,500 which are given for the purpose of regulated campaign spending. If the donor is aware that the staff member will spend at least some of their time on regulated campaign activity, then the donation is being given at least partly with this purpose.

Unlike for this year's UK Parliamentary general election, there are no requirements for quarterly pre-poll donations returns for non-party campaigners in Scottish Parliamentary elections. There is a post-poll donations return which accompanies the spending return. In this return you must report any donations that were given and used for regulated campaign activity, no matter when they were received.

This means that, for the purpose of reporting donations, you do not need to know in advance the proportion of the staff member's time that will be spent on regulated campaign activity. By the time you fill in your post-poll donation return you will be able to estimate what proportion of the staff member's time was in fact spent on regulated campaign activity, and you can report that amount.

- **Example A** – You received a donation of £20,000 towards a member of staff, and you employed someone for a year for £40,000. Four months of that year were in the regulated period, which is 33% of the year. Even if the staff member spent all of their time during the regulated period working on regulated campaign activity, 33% of £20,000 is £6,667, which is below the reporting threshold. You would therefore not need to report the money received for the staff member as a donation.

- **Example B** – You received a donation of £20,000 to employ a staff member for 3 months of the regulated period. You determine that 60% of their time was spent on regulated campaign activity, so you declare £12,000 as a donation.

I hope this is helpful. I have assumed that you are making reference to the regulated period in Scotland next year. If this is not correct, or if you have any further questions, please get in back in touch.

Kind regards,



Guidance Adviser

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

Tel: [REDACTED]

Fax: [REDACTED]

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Please consider the environment before printing this email

From: Alastair Cameron [REDACTED]
Sent: 11 August 2015 23:17
To: PEF Inbox
Subject: Staff costs

Hello

Scotland In Union is a registered non-party campaign group. We are planning to recruit some staff, and considering how that would need to be reported.

Some of our activity is non-regulated (for example, we organise events which are non-political, outside the restricted periods) and some of our activity is definitely regulated (for example, political leafleting). We understand the difference between these activities, but were wondering about splitting of staff time, and also about declaring donations for staff.

1. I have read Page 9 of your guide on non-party spending (http://www.electoralcommission.org.uk/_data/assets/pdf_file/0019/105940/sp-manage-spending-npc.pdf), but would just like to clarify something: the guide refers to staff time producing electoral material, but what about other staff time which could be construed as either our routine activity or campaigning - I'm thinking of areas such as our regular supporters' newsletter, maintaining our website, and fundraising. Would they need to be counted?
2. I also had a question about donations which are specifically for staff costs, as we have some donors who are prepared to help with staff costs now, at a time when we are not campaigning for a specific election. Do we need to declare those donations, if these staff subsequently become involved in regulated activity? I'm just thinking it could be difficult to split exactly how much of a donation needed to be declared - probably harder than splitting the spending on staff. Would we need to declare part of a donation, for example?

As an example of the paragraph above, what if someone gave us £20,000 for staff costs. We employed someone for a year and it cost £40,000. During that year, the person worked on both regulated and non-regulated activity - let's say for three months. Would we need to declare the £20,000 donation, or a part of it, because the staff member had spent some of their time on campaigning? And would we just need to pro rata it or something? This could matter to us now, because we'd be securing the donations now.

I hope those questions are clear, but do please get back to me if not.

Many thanks

Alastair Cameron

-

Alastair Cameron

Scotland In Union



www.scotlandinunion.co.uk

Scotland In Union is registered in Scotland, Number 492324.

Regarding 2015-08-11 - Alastair Cameron - Staff time, splitting and donations

Owner Sam Nicholson

Keywords

Duration Priority Normal

Due

Category Sub-Category

PEF Directorate Categories

PEF Parent Category PEF Category

Attachments

E-Mail Attachments Activity Attachment Associated View	
<input type="checkbox"/> File Name	File Size (Bytes)
No E-Mail Attachment records are available in this view.	
0 - 0 of 0 (0 selected)	Page 1



Status Reason Sent

E-mail

Re: Post-poll report f...

Sent Date 25/05/2016 22:59

E-mail

From  Alastair Cameron Cc
To  PEF Inbox Bcc
Subject Re: Post-poll report for Scottish Parliament 2016 election

Dear 

Thank you very much for your prompt and helpful reply. On point 2, I'm just going to look through our expenditure again, taking a cautious view, before I confirm we were sub £10k.

Many thanks
Alastair

On Wed, May 25, 2016 at 4:40 PM, PEF Inbox  wrote:

Dear Mr Cameron,

Thank you for your email.

1. When a non-party campaigner registers, their registration is valid for 15 months. In the last three of those months the registration can be renewed for a further year.

Scotland in Union was originally registered on 26 January 2015. Your registration would therefore have expired on 26 April 2016. However since that date fell in the regulated period for the elections in Scotland, Wales and Northern Ireland, Scotland in Union remained registered until the end of the regulated period, which was 5 May 2016.

We will update the register to reflect the fact that Scotland in Union's registration has now lapsed. This will not affect your ability to submit returns, should that be necessary.

2. You are right that if you spent less than £10,000 in the regulated period you do not need to submit a spending return. If this is the case for Scotland in Union, we would be grateful if you would confirm this to us by email.

3. You are right that to be reportable, a donation has to be both given for and used for regulated campaign activity.

4. Your donations and spending do not necessarily have to match up. If the donations were not given for use on regulated activity then they do not need to be reported. If you spent over £10,000, all spending on regulated activity must be reported regardless of whether a regulated donation funded it.

I trust this is helpful. If anything is unclear or if you have any further queries, please do not hesitate to get back in touch.

Kind regards,

[REDACTED]

Guidance Adviser

The Electoral Commission

3 Bunhill Row

London EC1Y 8YZ

Tel: [REDACTED]

Fax: [REDACTED]

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P Please consider the environment before printing this email

From: Alastair Cameron [REDACTED]
Sent: 24 May 2016 23:09
To: PEF Inbox
Subject: Post-poll report for Scottish Parliament 2016 election

Dear Sir/ Madam

I am the Director of Scotland In Union, and we were registered as a non-party campaign group for the 2016 Scottish Parliament election. I'm just looking at the reporting requirements, and had a few questions before we submitted a return. Please could you help with the enquiries below?

1. Please can you confirm we are automatically de-registered now the election has passed?

2. Reading your guide for non-party campaigners, Page 15, it seems to say that if we spent less than £10,000 on regulated activity, we may not need to report at all, despite having registered as a precautionary measure. Is that correct? I need to go through our spending, but we really did very little actual campaigning, and I don't think we will hit £10k (we did some online posts which could be deemed regulated, and we organised a hustings, but most of our activity during the period was our normal business and not aimed at the election).

3. For donations, we didn't receive any donations which were specifically for regulated campaign activity during that time - we are an organisation with a long-term mission, and donations during the period were just to us as an organisation. (Unlike for the 2015 general election, when we did receive some donations which the donors specifically asked to be used for that campaign.) So, I think we don't actually have any donations to declare - would that be correct?

4. Finally, if we do need to report our expenditure (even though under £10k total), do we need to somehow show donations which match it, or is it OK just to report the expenditure if the donations were general donations but we then decided how to use them? (Does that make sense? We got donations which were unconditional, but we did spend money on a hustings, for example.)

Many thanks - I hope those questions are clear, but if not do please get back to me, and I will look forward to hearing from you.

Yours sincerely

Alastair Cameron

--

Alastair Cameron

Scotland In Union



www.scotlandinunion.co.uk

Scotland In Union is registered in Scotland, Number 492324.

--

Alastair Cameron

Scotland In Union

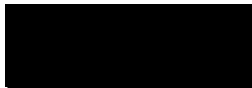


www.scotlandinunion.co.uk

Scotland In Union is registered in Scotland, Number 492324.

Regarding  2016-05-24 - Alastair Cameron - Third party reporting

Owner



Keywords

Duration

Priority

Normal

Due

Category

Sub-Category

PEF Directorate Categories

PEF Parent Category

PEF Category

The Electoral Commission

Mr A Cameron
Scotland In Union
272 Bath Street
Glasgow
G2 4JR

30 August 2016

Dear Mr Cameron,

Political Parties, Elections and Referendums Act 2000 (PPERA) Registration of Scotland In Union as a non-party campaigner

I am writing to notify you that your registration with us as a non-party campaigner lapsed on 6 May 2016.

Registration as a non-party campaigner usually lasts for 15 months. In order to remain registered, you are required to submit a notification of renewal no earlier than 1 month prior to the anniversary of your original notification which was 26 January 2016, and no later than three months after this date. Although we did not receive a notification within this time from you, Scotland In Union automatically remained registered until up to and including 5 May 2016 as the anniversary of your original notification fell within the regulated period for the May 2016 Elections.

If you wish to re-register with us as a non-party campaigner, you can make an application to do so at any time. However, you are only **required** to register with us before spending £20,000 in England or £10,000 in any of Scotland, Wales or Northern Ireland on regulated campaign activity in a regulated period in the run-up to an election. There are currently no scheduled elections in 2017 or 2018 at which the non-party campaigner rules under PPERA will apply, so registration is not a requirement at this time.

Our guidance on registering as a non-party campaigner and links to the forms you will need to re-register, should you wish to, are available on our website at the link below.

The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ

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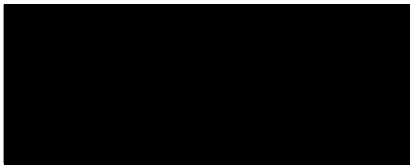


The Electoral Commission

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

If you have any questions about this letter or registering with us as a non-party campaigner, please do not hesitate to contact the Party and Election Finance team at pef@electoralcommission.org.uk or on [REDACTED]

Yours sincerely,



Andrew Whyte
Senior Adviser (Advice Service)
Party and Election Finance

[REDACTED]

From: Bob Posner
Sent: 05 January 2018 17:40
To: Andy O'Neill; Louise Edwards; John Franks; [REDACTED]
Cc: [REDACTED]
Subject: Scotland in Union query

I spoke by telephone with Pamela Nash. In summary:

- PN commenced by referring to information stolen from their organisation and the police were considering. I said we were not seeking this apparently stolen information from those organisations who might have received it, but would be writing to her organisation to establish whether they had complied with the rules as a NPC and I hoped that they would be able to satisfy us in that regard.
- PN considers we should have responded to her email today and that our media line today is misleading.
- I explained that we were not obliged to provide an advice service by immediate response, but in the context of this matter as statutory regulator we were considering the issues consistent with our enforcement Policy, and as indicated would be writing to her organisation next week. Our reply would take into account and address the points PN had raised in her email as part of that.
- Also that our media line is not misleading, it is in fact accurate, irrespective of her concern on how some elements of the media might choose to report matters. I also said nevertheless in view of her concern we would reflect on this sort of standard media line, but I thought it was right in view of our role as regulator and I trusted PN would respect that we have to proceed consistent with our Enforcement Policy process.
- I also corrected her assertion that we had been pro-actively speaking to the media, explaining that our Comms Team had simply responded to media query received, with what is a brief standard type line.
- PN thought we should apologise for not responding to her email and our media line. I said I could not see that was appropriate as we are doing our job as regulator in a normal way. PN said she might or would complain further. I said we have a complaints process. I said that I respected her concerns, but I doubted I would be able to allay them from her perspective. I said we were not responsible for how the media accurately or otherwise report matters.
- The line went dead at PNs end of the line.

PN sent an email to James saying her line had failed and could I ring back. I did twice, but got voicemail twice. I left a message I had called back.

Bob.

[REDACTED]

From: [REDACTED]
Sent: 05 January 2018 17:30
To: [REDACTED]
Subject: FW: FW: In Confidence

Hi Pamela, Bob tried to call back a couple of times but couldn't get through. He's left for the day now.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 05 January 2018 17:08
To: 'Pamela Nash'
Subject: RE: FW: In Confidence

Hi Pamela, what's the best number for you and he'll call you again

From: Pamela Nash [REDACTED]
Sent: 05 January 2018 17:04
To: [REDACTED]
Subject: Re: FW: In Confidence

Dear James

I have just been speaking to your director Bob, but the call appears to have been cut off.

I do not have a number for him or an email address to contact him again, but I would appreciate if you would let him know that he can call me to discuss this further, but if not I will be in touch with the Electoral Commission.

Kind regards
Pamela

Pamela Nash
Chief Executive
Scotland in Union

[REDACTED]
www.scotlandinunion.co.uk
t: @scotlandinunion f: <https://www.facebook.com/scotlandinunion>

Scotland in Union look forward to welcoming you to our Burns Night in Glasgow on 2nd February 2017, get your tickets [here!](#)

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On 5 January 2018 at 16:11, [REDACTED] wrote:

Dear Pamela,

Thank you for your email, I understand you have also telephoned.

To confirm, we are reviewing your questions and will respond to your queries in due course.

Kind regards,

[REDACTED]

[REDACTED]

Senior Financial Reporting Adviser

The Electoral Commission

3 Bunhill Row
London EC1Y 8YZ

[REDACTED]

electoralcommission.org.uk

yourvotematters.co.uk

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From: Pamela Nash [REDACTED]
Sent: 05 January 2018 12:32
To: [REDACTED]
Subject: In Confidence

Dear [REDACTED]

I understand that you have previously advised our Executive Director on our registration requirements. I would be grateful if you confirm the following points:

- The dates during which it is required that non-party campaigners report their donations over a certain value for the General Election 2017 (I understand this to be 3rd May 2017 to 8th June 2017).
- The exact threshold of donation to be reported to the Electoral Commission during the election period (I understand this is over £7500, donations of £7500 and under do not need to be reported).

I would be grateful if you could also clarify the rules around successful auctions bids at fundraising events for non-party campaigners. We have not received any in the reporting periods, but I am interested to know how they should be recorded (is the whole bid considered a donation by the Electoral Commission or should costs of the event where the auction is taking place and the cost of the prize be removed)? If the auction item is donated, are both the value of the donation and the successful bid considered donations?

Thank you for your advice.

Best wishes

Pamela

Pamela Nash

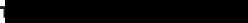
Chief Executive

Scotland in Union


www.scotlandinunion.co.uk

t: @scotlandinunion f: <https://www.facebook.com/scotlandinunion>

Scotland in Union look forward to welcoming you to our Burns Night in Glasgow on 2nd February 2017, get your tickets [here!](#)

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Hi [REDACTED]

Please see attached, which I hope all makes sense, and is in order!

1. XML submission.

2. Detailed workings, which consist of an updated version of the salary return (first tab) and then apportionment of each month's salary allocation to the relevant categories, thus giving the totals which appear in the XML submission. As you can see, because the team's duties overlap considerably, I think the best way to make a fair estimate has been to do the initial gross allocation at the individual level, then sum the total for the month, and then consider which the key regulated activities were in that month in order to allocate to categories.

I believe this is now as fair and comprehensive an estimate which I can make, and hope that it fits the bill. Please do get back to me if you have any questions or clarifications, otherwise thank you in advance for doing the upload, as it's certainly helped me to be able to use the XML.

Many thanks
Alastair

On 5 September 2017 at 11:11, [REDACTED]

Good morning Alastair

The spreadsheet you provided entitled 'SIU salary return GE2017 – corrected' is sufficient evidence of your workings. We will of course redact personal information before publication.

With regards to the actual return, if you would rather use the XML spreadsheet that we provided that is not a problem. I confirm that we will delete the single-line entry and upload the new items of expenditure to PEF Online on your behalf.

In answer to your first question, you should use the relevant category (i.e. Canvassing or Market Research) in Column C, as you have entered in under Example 1. Please do not enter Staff and Overheads in Column C.

I hope this helps. Please let us know if you have any further questions.

Best Regards

[REDACTED]

Financial Reporting Adviser

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London EC1Y 8YZ

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From: Alastair Cameron [REDACTED]
Sent: 04 September 2017 18:34
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: UK Parliamentary General Election 2017 spending return

Thanks [REDACTED] (and [REDACTED] with whom I recently discussed this too)

I'd arrived at the previous total by considering what proportion of each staff member's time could be reasonably said to be on activities which could be construed to pass purpose/ public tests. For example, for [REDACTED] I'd estimated 50% of his time should be declared, as much of his role is on social media, contacting volunteers and running stalls etc, and for our Press Officer I'd put the same, as much of his work is public (but he also writes newsletters and has other duties, so definitely not 100%). I can now try to re-estimate based on categories and then each staff member per category, but it will be only an estimate as with a small team people's roles do overlap somewhat, and unlike a political party quite a lot of our activity doesn't pass public or purpose tests.

I think I understand the ask below more clearly now, though - for (say) 'Events' I will have to consider what proportion of each staff member's time should be allocated that month. I think I will need to produce a data table of month/ staff member/ category/ amount, which would also be the detailed breakdown you need, and then do a pivot table (month/ category/ amount) and copy the totals by category into the return. This still feels pretty onerous, particularly compared to the requirement for Scottish Parliament Election 2016, but on the assumption that everyone's having to do it, and that it provides a useful degree of transparency, of course we will comply.

I would rather use the spreadsheet, I think, thanks, as otherwise it's more laborious entering into PEF, and also I won't be able to check whether it matches overall, so I'll do that. I think my only remaining questions therefore are:

1. Whether in Column C I should be using the Category (see Example 1 in attached), or using 'Staff and Overheads' in Column C and noting the category in Column G (see Example 2 in attached); and
2. To confirm that someone will delete the single-line entry which is in our return currently, and upload the data in the submission spreadsheet instead.

Many thanks

Alastair

On 4 September 2017 at 18:00, [REDACTED] wrote:

Dear Alastair,

[REDACTED] is away just now, so am picking this up.

I appreciate this is additional admin that you hadn't anticipated. Both [REDACTED] and myself will be available throughout this week to help you if needed, don't hesitate to contact us if we can be of assistance.

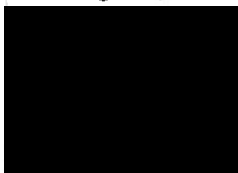
On the return, you should have an item for staff costs where relevant against each category – transport, election material etc. In this case, the supplier's name would be the organisation's name, you do not need to do a line on the return for each individual and they will not be named when we publish the return. As you must do a statement of all individual payments, it follows that each payroll will be a payment made, if there was regulated activity during that month. It may well be that there was not regulated activity in each month, in which case you needn't put an item.

So you are correct, there is a maximum of 12 x 5 items to add. In reality, this may not be this many.

In terms of a breakdown, if you can then provide to us in a spreadsheet or email, a demonstration of your workings, so that will include a breakdown of your costs by staff member. We will redact personal information before publishing.

Our IT team are checking if your return can be re-opened on PEF Online. Alternatively, you can enter the items into the spreadsheet attached and we will merge this into your return on your behalf, which may be the easier option.

Kind regards,



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From: Alastair Cameron [Redacted]
Sent: 29 August 2017 21:05
To: PEF Inbox
Subject: RE: UK Parliamentary General Election 2017 spending return

Thanks for this.

I'll do my best by 8th September, but please note that I submitted a return very promptly, and have only just had your note below.

I won't be in a position to log into PEF until 5th September, so I am a bit concerned about response times if I encounter any issues and need to ask any further questions. Therefore, please can you confirm in advance:

1. Do I need to enter this in PEF as one entry per month (so 12 entries, as the period covers 12 months)? (Rather than just emailing to you, for example.)
2. Is SIU's return now re-opened in PEF, i.e. not showing as submitted? If so, do I need to delete the original item and then add the 12 new items?
3. When I go into PEF online have I understood correctly that for each monthly entry, I need a breakdown by staff member (five or so) and by category (five or so), so that for each month there will be c25 lines in a spreadsheet/pdf, and thus 12 x 25 (total 300) lines of data in total? I'm just asking this because it seems a pretty major admin burden for a small organisation, but that's what it seems to imply in your emails below.

Thanks

Alastair

On 24 Aug 2017 4:53 pm, "PEF Inbox" [REDACTED] wrote:

Hi Alastair

Thanks for your email.

Non-party campaigners that spent below £250,000 on regulated activity must submit a complete return no later than Friday 8 September 2017, so you should aim to provide the requested information to us by that date.

Please note that for the payment dates, you should be able to use the payroll dates. You must enter each separate payroll date as a separate individual payment on PEF Online i.e. one each for April 2017, May 2017 etc.

A spreadsheet or a PDF of the breakdowns is sufficient, one each per payroll date.

Once again, please get back in touch if you have any further questions.

Best Regards

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From: Alastair Cameron [REDACTED]
Sent: 23 August 2017 07:51
To: PEF Inbox
Subject: Re: UK Parliamentary General Election 2017 spending return

Hello

Sorry, I missed that requirement - I think last time we did a return, it wasn't needed. I can do this estimated breakdown by staff member and category, but I am currently on holiday in France without my PC.

I hope it's OK to do this on my return, probably 10th/ 11th September (I return on 5th September but will be straight back to my paid work)?

Also, can I just provide you with a spreadsheet/ pdf document of the breakdown?

Thanks

Alastair

On 22 Aug 2017 6:13 pm, "PEF Inbox" [REDACTED] wrote:

Dear Mr Cameron

Thank you for submitting the spending return for Scotland in Union on PEF Online.

I note that you have entered staff costs of £27,532.06 under reference SP0320338 but have not provided documentary evidence for this item of expenditure of over £200. Please refer to the following for guidance on submitting staff costs.

You are required to report staffing costs in respect of relevant categories. We ask that you make an honest and reasonable assessment of the amount of staff time, and therefore costs, attributable to each category. So, in each category – say, events – you will have an item for staff costs, and again for election material etc. In the return you do not need to break down each individual staff member as a supplier, as we will not publish this anyway for data protection reasons.

For evidence, we do not require staff payslips. A statement detailing the name of each staff member and your calculations on the time they spent on regulated activity will suffice. For example:

Staff	Total regulated spend	Category	
Name of person 1	£10,000	Travel	Nil
		Events	£5,000
		Election material	£5,000
		Etc	
		Etc	

We will always redact information which can identify an individual's identity as part of our process prior to publication. We will still publish the totals you submit next to each category and the totals which appear on the evidence you provide. Please do not redact any information yourself. We will apply the redactions prior to publication.

When you submit your return, please include the totals (for relevant staff) against each category, which we will publish. For the payment dates, you should be able to use the payroll dates (I presume they are all the same for all staff).

I hope that is clear, but don't hesitate to contact us further if you have any queries.

Best regards


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--

Alastair Cameron

Scotland In Union

www.scotlandinunion.co.uk

Scotland In Union is registered in Scotland, Number 492324.

--

Alastair Cameron

Scotland In Union

www.scotlandinunion.co.uk

Please come to one of our fundraising dinners - in Edinburgh on Thursday 26th October 2017, and in London on Wednesday 15th November 2017, and support our campaign, making the positive case for Scotland in the UK.


Scotland In Union is registered in Scotland, Number 492324.

E-mail

RE: Spending return

Sent Date 10/08/2017 09:57

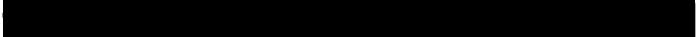
E-mail

From  Alastair Cameron **Cc** 
To  **Bcc** 
Subject RE: Spending return

Phew.

Funny that I couldn't see it myself, but maybe I was looking under the wrong entry too, or perhaps I can't access it once it's been submitted but not yet published? Anyway, as you have confirmed it's submitted successfully, I'll relax now!

Thanks
Alastair

On 9 Aug 2017 8:29 am, 

Dear Mr Cameron,

Thank you for your email. I can now confirm the Scotland in Union return for the 2017 UKPGE has been submitted on PEF Online. Please accept my apologies for the confusion – I had accidentally looked at the previous regulated entity profile for Scotland in Union (registered 26 January 2015 to 06 May 2016) rather than the current one (registered 26 May 2017).

Thanks again,





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 cid:image001.jpg@01D29672.633D0FF0

From: Alastair Cameron [REDACTED]
Sent: 07 August 2017 22:16
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Spending return

Hello [REDACTED] (and [REDACTED] as I know [REDACTED] is on leave)

I am confused and concerned by this.

I know I submitted an expenditure return, and I received an acknowledgement email and saved all the details. I have forwarded the confirmation email to you [REDACTED] separately, and will now forward to [REDACTED] as well, and I attach here the details which I downloaded after receiving confirmation.

However, I have this evening logged back into PEFonline, and it shows as 'in progress' with no details submitted at all. It would appear that the PEF database has lost all the information I entered, which took many hours of painstaking work.

Please could someone look into this as a matter of urgency, and check the situation around the time on 16th July when I completed and submitted my return (having repeatedly saved along the way)? I presume there is some kind of edit or version history which would enable this investigation, and that the information can be recovered.

I look forward to hearing from you urgently.

Thank you

Alastair Cameron

On 7 August 2017 at 09:32, Mette Christensen [REDACTED] wrote:

Dear Alastair

Thank you for your query to the Electoral Commission regarding submitting the spending return for Scotland in Union for the UK Parliamentary general election.

I have checked with colleagues, who has informed me that your return is 'in progress', which means that you will need to log back in to PEF online and click 'submit' to complete the submission.

If you need anything further then please let me know.

Kind regards

[Redacted]

Senior Adviser Elections and Campaigners

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Mob: [Redacted]

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--

Alastair Cameron

Scotland In Union

[Redacted]

www.scotlandinunion.co.uk

Scotland In Union is registered in Scotland, Number 492324.

Regarding  Scotland In Union

Owner [Redacted]

From: PEF Inbox
Sent: 03 August 2017 16:42
To: PEF Inbox
Subject: Action required: Reporting requirements following the UK Parliamentary General Election
Attachments: XML Third Party Campaign Expenditure.xls

Dear Responsible Person,

I am writing to explain your spending and donations reporting responsibilities as a registered non-party campaigner following the UK Parliamentary General Election on 8 June 2017.

Do I need to complete a spending return?

You must complete a spending return if you spent above the registration threshold on regulated activity in any part of the UK during the regulated period that ran from 9 June 2016 to 8 June 2017. This is £20,000 in England, or £10,000 in either Scotland, Wales or Northern Ireland.

If you **did not** spend above this threshold, **you do not need to complete a full spending return, but should let us know by return email that this is the case and the amount you spent.**

If you did spend above any of the registration thresholds, **you must report your spending and donations to us in full.** The deadlines for this are as follows:

- If you spent £250,000 or below on regulated activity, you must submit your spending return not later than **Friday 8 September 2017**
- If you spent more than £250,000 on regulated activity, you must submit your spending return not later than **Friday 8 December 2017**. You must also have your return audited and submit an auditor's report alongside the return

It is a legal requirement to submit a complete return and all relevant invoices or receipts for individual payments over £200. If you do not submit your return by the statutory deadline, you will be liable for enforcement action, in line with the Commission's published Enforcement Policy.

How do I complete my return?

There are three methods by which you can complete the return:

- on paper, one form each for spending (form / explanatory notes) and donations (form / explanatory notes)
- using our online database PEF Online
- XML spreadsheet attached (for spending only. You should use PEF Online or the paper form to submit donations)

For shorter returns, you may find it easier to use the paper form or enter the data line by line into PEF Online yourself.

For ease and particularly for larger returns, we recommend you use the XML spreadsheet to capture your spending, and return it to us to manage uploading it into the PEF Online system on your behalf.

Please note our email system cannot accept messages larger than 10MB. If this is going to be an issue, please contact us to discuss alternatives.

What does my return need to include?

Your return must include:

- A statement of all payments made, including payments, notional expenditure, unpaid expenses and disputed claims
- Invoices for payments over £200
- A donation report, including details of:
 - all impermissible donations
 - all accepted donations over £7,500
 - all accepted donations that add up to over £7,500 from the same donor
 - the total of all other accepted donations that were worth more than £500 and less than or equal to £7,500. You do not need to provide details of these donations but just the total figure
- Audit report if your regulated spending exceeds £250,000
- A declaration by the responsible person (see wording below)

Declaration

I declare that I have examined the information in this return and that, to the best of my knowledge and belief, it is a complete and correct return as required by law, and that all expenses shown in it as paid have been paid by me or by a person authorised under section 90 of the Political Parties, Elections and Referendums Act 2000.

Submitted by the responsible person.

Signed:

Printed Name:

Date:

What resources are available to help?

We have produced a suite of guidance documents on the rules that apply to non-party campaigners, and on how to complete your paperwork.

We are here to help, so if on reading the documents, you have further questions, please don't hesitate to contact us on 0333 103 1928 or pef@electoralcommission.org.uk.

E-mail

Re: Registering after I...

Sent Date 26/05/2017 23:20

E-mail

From  Alastair Cameron **Cc** [Redacted]
To [Redacted] **Bcc** [Redacted]
Subject Re: Registering after lapse - Scotland In Union

Thanks, [Redacted] and for your help on the phone earlier today.

Notwithstanding recent email conversation with [Redacted] in which I have indicated that we believe we do not need to register, I have now registered SIU as new, as discussed, so that we can complete a post-poll expenditure report for the relevant activities as discussed with [Redacted]

Thanks for your help.
Alastair

On 26 May 2017 at 12:28, [Redacted] wrote:

Alastair,

Thank you for our conversation today. I can confirm that you need to create a new entity in PEF Online. In our conversation you said that you were going to do the application this evening. As Monday is a bank holiday I will review your application on Tuesday and confirm receipt with you.

Regards

[Redacted]
Senior Adviser – Registration

The Electoral Commission

3 Bunhill Row

London, EC1Y 8YZ

Tel: [Redacted]

Fax: [Redacted]

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-

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-



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From: [REDACTED]
Sent: 26 May 2017 11:01
To: [REDACTED]
Subject: FW: Registering after lapse - Scotland In Union

We received this email from SIU

From: Alastair Cameron [REDACTED]
Sent: 25 May 2017 23:34
To: PEF Inbox
Cc: [REDACTED]
Subject: Registering after lapse - Scotland In Union

Hello

I am the Responsible Person for Scotland In Union, a non-party campaign group. We have previously been registered via PEFonline, but deliberately let our registration lapse after the 2016 Scottish Parliament election, as at the time we intended taking no part in the Council elections in 2017 (and of course didn't know a General Election might be called).

In correspondence with the Electoral Commission office in Scotland, I believe we may now need to register again, but when I log into my PEFonline account I can't see how to re-activate registration. Please could you either let me know what to do, or change the status of Scotland In Union to being registered rather than lapsed?

Many thanks

Alastair Cameron

[REDACTED]

--

Alastair Cameron

Scotland In Union



www.scotlandinunion.co.uk

Scotland In Union is registered in Scotland, Number 492324.

--

Alastair Cameron
Scotland In Union



www.scotlandinunion.co.uk

Scotland In Union is registered in Scotland, Number 492324.

Regarding  2017-04-25 Campaign activities by Scotland in Union

Owner 

Keywords

Duration Priority Normal


Due

Category Sub-Category

PEF Directorate Categories

PEF Parent Category PEF Category

Attachments

 E-Mail Attachments Activity Attachment Associated View		
<input type="checkbox"/> File Name	File Size (Bytes)	
<input type="checkbox"/> image003.jpg	3,444	
1 - 1 of 1 (0 selected) Page 1		

Status Reason Received

Thank you, [REDACTED] - that's very helpful.

We will take a look at this and discuss it at our Management Meeting on Monday, then decide how to proceed. We may need to come back for some clarifications, which I hope will be OK.

Regards
Alastair

On 21 April 2017 at 10:14, [REDACTED] wrote:

Dear Mr Cameron

Thank you for your enquiry on Wednesday regarding the rules for non-party campaigners at the forthcoming UKPGE.

We have now published core guidance for NPCs, which you are able to find here:
<http://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/non-party-campaigners/2017-elections>

Once you have had a chance to read the guidance, then please get in touch if you have any further questions.

Kind regards

[REDACTED]
Senior Adviser Elections and Campaigners

The Electoral Commission

Lothian Chambers

59-63 George IV Bridge

Edinburgh EH11RN

Tel: [REDACTED]

Mob [REDACTED]

Fax: [REDACTED]



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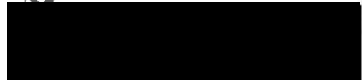
E-mail

Re: RE: FW: Scotland i...

Sent Date 11/06/2017 20:09

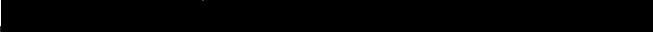
E-mail

From  Alastair Cameron Cc 

To  Bcc 

Subject Re: RE: FW: Scotland in Union CCM:0256579

Thank you, Mette. I will look forward to meeting you then.
Kind regards
Alastair

On 6 June 2017 at 12:28  wrote:

Dear Alistair

Thank you for your reply.

Monday 19 June at 14:00 at our office would be fine.

Kind regards



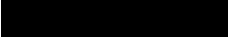
Senior Adviser Elections and Campaigners

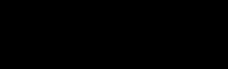
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EC GE English Email signature

From: Alastair Cameron [REDACTED]
Sent: 05 June 2017 22:19
To: [REDACTED]
Cc: Graeme Pearson
Subject: Re: RE: FW: Scotland in Union CCM:0256579

Thanks [REDACTED]

I did wonder whether 9th June might have been a challenge!

I'm keen that we don't delay our return, so was wondering whether Monday 19th might be possible (10am or 2pm)?
If not, then perhaps Friday 23rd at 2.30pm?

We have put in returns for Scottish Parliament 2016 and UKGE 2015 before, so I think we'd be OK, but just think it could be worth taking up your kind offer if possible.

Many thanks

Alastair

On 5 June 2017 at 14:35, [REDACTED] wrote:

Dear Alastair

Thank you for your reply.

Unfortunately, we will not be able to meet on Friday, due to post election work on that day.

We would, however, be able to meet any time on 16, 23 or 27 June. Alternatively, if there is any date, which suits you better, then please let me know and I can suggest a suitable time.

Kind regards

Senior Adviser Elections and Campaigners

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EC GE English Email signature

From: Alastair Cameron
Sent: 01 June 2017 22:05
To:
Cc: Graeme Pearson
Subject: Re: RE: FW: Scotland in Union CCM:0256579

Dear

Thank you very much for this clarification; it's very helpful. I now understand we will have to go back through the whole period and determine which of our expenditure is on activities which pass the public and purpose tests, in order to submit our post-poll expenditure report. It seems slightly ironic that we are going to have to report so much, when we deliberately stayed out of the local elections, and have done no campaigning for the UK general election, but at least we now know what we need to do, so that's very useful.

While I think we have now clarified the main point which we were concerned with, which was the time period and the impact (or lack thereof) of us not participating since the GE was called, it is kind of you to offer to meet for advice, and I'd like to take that offer up if possible. I'm currently on in Edinburgh on certain days of the week, so the next

opportunity for me would be on Friday 9th June; I could meet any time up to 10.30am, or between 2.30pm and 3.30pm. I imagine half an hour would be sufficient? Do any of those times work for you, despite it being the day after the election itself?

Many thanks

Alastair

On 31 May 2017 at 16:28, [REDACTED] wrote:

Dear Alastair

Thank you for your reply.

Firstly, I thought it might be helpful to clarify the section in the 'Overview of Regulated Non-Party Campaigning' guidance, which you cited in your email. That section would only apply in cases where a political party has changed their position on an issue that you are campaigning for, as the campaign previously would not have been for or against a political party, or particular categories of candidate, including campaigns on policies or issues closely associated with a particular party or category of candidates. It is our view that parties in Scotland do have a clear position on the issue that you have been campaigning for, and that they have maintained that position during your campaign. The rules for non-party campaigners would therefore apply to some of your previous campaign activities not because there has been a change in party policy, but because the rules for a UK Parliamentary election has changed the context of your campaign.

Secondly, thank you for confirming that you intend to register with the Commission as a non-party campaigner, and I understand that you submitted an application on Friday. Once registered you will need to:

- submit weekly pre-poll donation reports, which will start from the day that you register. The reporting dates are set out on our website here: <https://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/non-party-campaigners>
- submit a spending return to the Commission within 3 months of the election if the regulated activity that you have undertaken amount to more than £10,000.

The Commission offers an advice and guidance service in order to support campaigners to comply with the rules. In that respect we would be happy to meet with you in the next few weeks to discuss your campaign activities in further detail. Do let me know if you would be interested in a meeting.

If you have any further questions about the rules at this stage, then please let me know.

Kind regards

[REDACTED]
Senior Adviser Elections and Campaigners

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EC GE English Email signature

From: Alastair Cameron [REDACTED]
Sent: 24 May 2017 23:58
To: [REDACTED]
Cc: [REDACTED] Graeme Pearson
Subject: Re: RE: FW: Scotland in Union

Dear [REDACTED]

Thank you for your guidance, below, on how Scotland In Union should consider registration for the UK General Election. [REDACTED] has forwarded it on to me as the Director responsible, and because I have managed our registration and returns previously.

Scotland In Union suspended our public activity when the General Election was announced on 18 April 2017. We believe we are not required to report retrospectively, based on Page 16 of the Electoral Commission's 'Overview of Regulated Non-Party Campaigning' guidance:

Sometimes, a political party may publicly adopt policies that you are already campaigning for.

If your campaign was not previously regulated, your subsequent campaign activity is unlikely to become regulated campaign activity simply because a

party has changed its position. However, it may become regulated campaign activity if, for example, you:

- publicise the political party's support in your subsequent campaigning, or***
- alter or increase your campaigning activity on the policy as a result of their support.***

We believe that our campaign for Scotland in the UK, and against a second referendum, falls under this description.

As we have carried out no campaigning activity which is relevant to the General Election since the election was announced on 18 April 2017, we have nothing to report since then. We note, however, your highlighting of the Council elections period. SIU deliberately took no direct part in the Council election campaign, as we believe that the issue of the future of the UK Union should not be relevant to local elections. We did continue some of our own campaign activities during the period, without touching on matters of Local Government responsibility. That said, some people and organisations did appear to make the UK Union part of their Council campaigns, so I presume that is why the period is of particular interest to you.

Thus, we think we need to consider the period between the start of the regulated period of the Council elections (which we are taking as being 22 March 2017, as the first day a candidature could have been declared) and 18 April 2017, which was when the General Election was announced and the point at which we suspended our campaign activities. We believe that our expenditure in this period on activity which could potentially be considered to pass the public and purpose tests will be under £10,000 in total. (I believe it will consist of the costs of one newspaper advert of c£1,500, some staff time, some paid design work, and the costs of some leaflets which we did give out during that period, but I need to contact our staff to confirm this.)

Notwithstanding our view that we therefore are likely to be under the threshold (subject to working out the exact amounts), in the interests of transparency and following your email, we will now register as a non-party campaign group, and we will declare in our post-poll expenditure return any of our activities which we believe pass the purpose and public tests between 22 March 2017 and 18 April 2017 (or indeed 8 June 2017).

We hope that we have interpreted the various guidance correctly, and that we have correctly defined the period which would be of interest. Please could you let me know as soon as possible if there is anything in the rationale above which you believe means we have missed something? We are of course very keen to ensure that we comply with all relevant regulation and legislation.

Many thanks, and I look forward to hearing from you. I will go ahead and register Scotland In Union using PEFonline tomorrow, Thursday 25 May 2017, and we will adopt the approach described above, unless you have any further points which you think might be relevant.

Thank you again for your assistance.

Kind regards

Alastair Cameron

Director

On 24 May 2017 at 15:40, [REDACTED] wrote:

----- Forwarded message -----

From: [REDACTED]
Date: 24 May 2017 3:26 p.m.
Subject: RE: FW: Scotland in Union
To: [REDACTED]@scotlandinunion.co.uk>
Cc: [REDACTED]

Dear [REDACTED]

Thank you for your response. We note your comments regarding the retrospective period and would refer you to our guidance regarding spending before the UKPGE was announced.

Our specific concerns relate to campaigning undertaken by yourselves just prior to and during the candidate regulated period of the Scottish council elections. We are aware that during this period, you

- produced and distributed leaflets
- took out a newspaper advertisement.

Please note that campaigning in and around the council elections for or against a particular party or category of candidates will count towards your spending, despite the fact that the UKPGE had not been called at that point.

This spending will have been regulated if it meets the public and the purpose test. Please confirm that you have specifically considered the application of the rules to these activities and confirm that the amount spent was below £10,000 (the threshold for registering for spending in Scotland). In the event that the spending on these activities meets both tests and is over this amount, you must register with us. Registering will ensure that your spending is reported and therefore transparent, and that there is no risk of you committing any further offence.

We are unlikely to consider enforcement action against non-party campaigners that have taken prompt steps to register, even if their regulated spending is in excess of the registration threshold, prior to the UKPGE being called.

If you are not sure about whether spending is regulated, you should consider whether registering will remove the risk of your breaking the spending rules. We are happy to discuss this further.

May we please have a response by cob Friday 26 May 2017.

Kind regards

[REDACTED]
Senior Adviser Elections and Campaigners
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge

Edinburgh EH11RN

Tel: [REDACTED]

Mob [REDACTED]

Fax: [REDACTED]

electoralcommission.org.uk

yourvotematters.co.uk

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EC GE English Email signature

From: [REDACTED]
Sent: 22 May 2017 13:54
To: [REDACTED]
Subject: Re: FW: Scotland in Union

Dear [REDACTED]

Thanks for your email last week. Apologies for my delayed response - [REDACTED] so I was working from home all last week.

As you know, we are very conscientious about our activities and ensuring that we always do the right thing. Along with every other campaign group and charity, we obviously had no idea that a snap election would be called in May so it is somewhat a surprise to learn that the electoral campaign period can be backdated retrospectively.

In light of your email, our CEO, Graeme Pearson held a discussion with the team and we do not currently identify activities coming within your remit, but we will review the earlier period of the year and will be in contact should that view change.

I hope this answers your question, but do of course get in touch if not.

All best wishes

Please note my usual working hours are 9am-5pm Monday to Thursday only.

[REDACTED]

Research and Events Manager

Scotland In Union

www.scotlandinunion.co.uk

Scotland In Union is registered in Scotland, Number 492324.

On 10 May 2017 at 16:17, [REDACTED] wrote:

Dear [REDACTED]

Thank you for your email, and for making us aware of your campaign intentions.

The regulated period for non-party campaigners at the 2017 UK Parliamentary General Election (UKPGE) began on 9 June 2016 and will end on polling day, 8 June 2017. This means that campaign activities that you have undertaken between 9 June 2016 and the date that you decided to stop campaigning could potentially be considered regulated activity, if they meet the purpose and the public test.

During the UKPGE regulated period non-party campaigners are subject to limits on their spending on 'regulated campaign activity'. These limits and the activities that are considered regulated campaigning are set out in further detail in our guidance for non-party campaigners, which you are able to find here:
<http://www.electoralcommission.org.uk/i-am-a/party-or-campaigner/non-party-campaigners/2017-elections>

As part of the Commission's ongoing monitoring approach we have observed that you have undertaken a number of campaign activities during this period, and that these have intensified in the last few months. You will therefore need to consider each of the activities that you have already undertaken in the context of what would be considered regulated campaign activity for the UKPGE or any of the other elections that were held during the regulated period.

Once you have assessed whether you believe prior campaign activities undertaken during the regulated period could be considered regulated campaigning, then we would be grateful if you could confirm which activities you consider to be regulated (if any), and the cost of the activities that you consider regulated.

Kind regards

[REDACTED]
Senior Adviser Elections and Campaigners

The Electoral Commission

Lothian Chambers

59-63 George IV Bridge

Edinburgh EH11RN

Tel: [REDACTED]

Mob: [REDACTED]

Fax: [REDACTED]

electoralcommission.org.uk

yourvotematters.co.uk

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EC GE English Email signature

From: [REDACTED]
Sent: 25 April 2017 10:05
To: [REDACTED]
Subject: Re: FW: Scotland in Union

Dear [REDACTED]

Lovely to hear from you again!

This is just a note to let you know we will not be campaigning in the general election (or council elections), and are going to take a step back until after June 8th. A note is going on our website today to inform people of our position. We are therefore not planning to register with the Electoral Commission.

Please let me know if this is ok?

I look forward to hearing back from you

[REDACTED]

Please note my usual working hours are 9am-5pm Monday to Thursday only.

[REDACTED]
Research and Events Manager

[REDACTED]
Scotland In Union

[REDACTED]
www.scotlandinunion.co.uk

Scotland In Union is registered in Scotland, Number 492324.

On 20 March 2017 at 16:08, [REDACTED] wrote:

Dear [REDACTED]

Thank you for your email, which has been forwarded to me for response.

Non-party campaigners that intend to spend more than £10,000 on regulated campaigning ahead of a UK Parliamentary general election, Scottish Parliamentary election, Welsh Assembly election or a Northern Irish Assembly election are required to register with the Electoral Commission. Any campaigner at a referendum who intends to spend more than the threshold set out in the referendum legislation would also need to register with the Commission.

The next scheduled poll at which non-party campaigners may be required to register with the Commission would be the UK Parliamentary election in 2020. However, in the event that a referendum place before then, the detailed rules for campaigners would be set out in the referendum legislation and we would be happy to meet with you to discuss the rules once they have been agreed by the relevant parliament.

If you need any further advice at this stage, then please let me know.

Kind regards

[REDACTED]
Senior Adviser Elections and Campaigners

The Electoral Commission

Lothian Chambers

59-63 George IV Bridge

Edinburgh EH11RN

Tel: [REDACTED]

Mob [REDACTED]

Fax [REDACTED]

EC Scotland Email signature

From: [REDACTED]
Date: 6 March 2017 17:05:07 GMT
To: Susan Bruce [REDACTED]
Cc: Andy O'Neill [REDACTED]
Subject: Re: Scotland in Union

Dear Dame Susan

Many thanks for your response. I will wait to hear back from you in due course.

All best

[REDACTED]

Please note my usual working hours are 9am-5pm Monday to Thursday only.

[REDACTED]

Research and Events Manager

[REDACTED]

Scotland In Union

[REDACTED]

www.scotlandinunion.co.uk

Scotland In Union is registered in Scotland, Number 492324.

On 4 March 2017 at 00:12, Susan Bruce [REDACTED] wrote:

Dear [REDACTED]

Thank you for your email. I am happy to arrange a follow up to your enquiry. I have copied in my colleague, Andy O'Neill who heads up the Scotland Office of the Electoral Commission. I will discuss this with him to enable us to offer the most appropriate advice on registration.

Either Andy or I will come back to you in early course.

Your sincerely,

Sue Bruce

Dame Sue Bruce
Electoral Commissioner, Scotland
The Electoral Commission
Lothian Chambers
59-63 George IV Bridge
Edinburgh
EH1 1RN

[REDACTED]

Sent from my iPad

On 2 Mar 2017, at 12:14, [REDACTED] wrote:

Dear Dame Susan

I am writing from pro-UK campaign group, Scotland in Union. We are a non-party organisation campaigning against another referendum and making the positive case for staying part of the UK.

Our Chief Exec, Graeme Pearson, has indicated that he would value your advice going forward, ahead of any pressing need to seek it should things develop. We understand there is no need for us to register with the Electoral Commission ahead of the council elections as we have no involvement there.

Graeme would be more than happy to come and discuss this face to face if that would be convenient to you, alternatively perhaps we could schedule a phone call?

I look forward to hearing back from you

[Redacted]

Please note my usual working hours are 9am-5pm Monday to Thursday only.

[Redacted]

Research and Events Manager

[Redacted]

Scotland In Union

[Redacted]

www.scotlandinunion.co.uk <<http://www.scotlandinunion.co.uk>>

Scotland In Union is registered in Scotland, Number 492324.

--

Alastair Cameron

Scotland In Union

[Redacted]

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Alastair Cameron

Scotland In Union

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