Committee on Standards in Public Life
Review into the regulation of election finance

1. **Did you register at the 2015, 2017 or 2019 general elections? If yes, why did you register? (Was it because you intended to spend over the threshold for registration? Did you register as a precaution? Other reasons?)**

Yes, Friends of the Earth England, Wales and Northern Ireland (FOE) registered for each the 2015, 2017 and 2019 general elections.

Below the individual elections are taken one by one:

2015
Friends of the Earth registered for the 2015 General Election and spent almost£24,000 on regulated activity in England. As a result of activity during this election, Friends of the Earth was fined £1000 by the Electoral Commission for a breach of electoral law, whereby we exceeded the regulated spend threshold of £20,000 in England as a result of joint activity with another environmental organisation, without registering as a third party. An administrative error meant Friends of the Earth failed to complete the correct registration procedure. Friends of the Earth cooperated fully with the Electoral Commission, and this was noted by them.

Friends of the Earth's lack of familiarity with the, then, new system contributed to the errors which led to the fine. Unlike political parties which will stand in repeated elections, civil society organisations may or may not engage in campaigning activity during a regulated period. Only the largest and most active are likely to build an institutional experience of the system. If unfamiliarity is liable to contribute to non-compliance and a fine, this is evidently not workable as it leaves smaller or less experienced organisations discouraged to engage with it for fear of errors leading to the reputational damage that would accompany a breach or fines that they cannot afford.

2017
Friends of the Earth registered as a non-party campaigner and our regulated spend was £46,730.83, as submitted to the Electoral Commission in our return.
It should be noted that, on top of this, following that election we calculated that over £17,000 of staff time was spent on ensuring compliance with the Act, including briefings for all relevant staff members, reading and preparing guidance documents, and staff responsible for decision-making around regulated activity, interacting with the Electoral Commission and logging regulated spend, and completing returns.

After the 2017 election, Friends of the Earth were fined £250 by the Electoral Commission for late delivery of our spending return.

2019

Based on estimates of staff time spent on potentially regulated activity, Friends of the Earth took the decision to register on 22nd November 2019, as there was a significant likelihood of going over the £20,000 limit for registration. Our total regulated spend was £36,121.49, of which all but £480 was staff time.

2. What is your view of the guidance documents for non-party campaigners produced by the Electoral Commission?

We have worked closely with the Electoral Commission (EC) over the last few years, both as an individual organisation and through an an informal network of charities and campaign groups, who work together under the name Civil Society Voice to improve the environment for civil society campaigning. In particular we worked with the EC, by giving feedback on the draft guidance and agreeing to be a case study, to improve guidance for issues-based non-party campaigners (NPCs) following the 2017 election, which was then used for the 2019 election.

During both the 2017 and 2019 General Election campaign periods, we hosted an electoral law guidance session in our offices with representatives from the EC to talk through guidance and answer questions, with a wide range of civil society organisations attending.

Following the 2019 election, we felt, and fed back to the Electoral Commission, that the new guidance, with case studies included, was clearer and more applicable to the nature and intention of work by NGOs and NPCs. The Electoral Commission had clarified the two gateway tests for regulated spend, and the retrospectivity of the regulated period in a snap election as far as was possible, as well as making guidance more suitable for the type of issues-based campaigning that we do[1].

The new guidance attempts to clarify what meets the purpose test, to give confidence to issues-based NPCs to decide with greater certainty where spending is regulated. While it goes some way to achieving this, and is markedly better than the guidance received in previous years, any improvements and impacts on the well-established chilling effect on civil society campaigning are fundamentally limited by the flawed nature of the legislation itself(the issues with the legislation are explored in more detail in answer to question 5). This is particularly the case for the working together rules, which remain a huge barrier to coalition working that incurs regulated spending during an election. If anything, the guidance being somewhat clearer has only served to highlight how problematic the joint working rules are.

We also note that, despite improvements, it still required Friends of the Earth to devote a significant amount of staff time to ensuring compliance with the regulations. While we did not repeat the exercise to qualify our cost of compliance as we did after the 2017 election, the 2019 General Election required two members of staff to divert a significant proportion of their time to compliance.

[1] "Purpose Test: Campaigning on an issue", The Electoral Commission, last updated 23/09/2019, https://www.electoralcommission.org.uk/non-party-campaigners-where-start/does-your-campaign-activity-meet-purpose-test/purpose-test-campaigning-issue

However, the impression of Friends of the Earth, with our experience in this area and the ability to dedicate staff time, of the clarity and ease of navigation of new guidance is less important (especially as we fed back on the draft so were familiar with some aspects before it was published) than that of smaller organisations and those engaging with the process for the first time.

3. **Have you asked the Electoral Commission for advice? If so, what is your view of the quality and timeliness of the advice provided?**

At each general election since the passing of the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 we have had extensive interactions with the EC.

In both 2017 and 2019 elections staff from the EC engaged with us on a number of issues where we sought advice on whether specific activity could pass the purpose test, the retrospectivity in the regulated period and on the issue of apportionment, where for example only specific pages on our website were regulated.

In 2017, while engagement from the EC was good, there were problems with the quality advice, with advice on the same issue from an EC staff member changing over time and between interactions. Also, we had difficulty ensuring that advisors we were speaking to understood the nature of our work as inherently non-party political. In many cases the answer from the staff was that they didn't know, that we would need to use our judgement and we should read the legislation. This was inadequate.

Where they did give a steer, they were only able to go so far as to say it was "unlikely" they would seek enforcement over retrospectivity issues, which is not sufficient confidence. FOE staff involved with compliance are familiar with the legislation and guidance, and expected greater clarity from the EC. It is hard to tell how the EC are able to enforce compliance with the Act if they are not able to advise confidently whether activity will be considered regulated or not- especially as they were the organisation that would undertake enforcement. Overall, in 2017 the advice we received from the EC was not consistent and did not give sufficient clarity. Staff seemed inadequately familiar with the concept of non-party campaigning and the sort of activity we undertake and were insufficiently familiar with the legislation.

In the 2019 election our experience was much more positive, and responses were received in a timely manner. We sought specific advice from the EC on two issues – an appearance on a podcast and a company wishing to share our General Election work. On both issues the commission were able to give a fairly clear steer of whether the activity might be regulated or not, however there was still a reliance on only being able to go as far as to say that enforcement over certain activity would be "unlikely". There seemed to be a greater understanding of the nature of the work we undertake as a non-party political organisation, and broadly better grasp of the legislation. However, it is important to note that, by the time we were within the election period, we had been working with staff at the EC for a number of months on these issues, therefore had built up a good working relationship. We therefore

cannot comment on what the experience in terms of quality and timeliness might be for organisations that are less familiar with the EC, or whose work the EC are less familiar with.

The issues still remains however that, in most instances, our questions concern both retrospectivity and the purpose test, for which the EC is limited in interpreting badly written legislation within the Lobbying Act (Part 2 of the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 amending The Political Parties, Elections and Referendums Act 2000). This issue becomes fatally compounded where joint working is considered, as it relies on all organisations having a shared interpretation of the law, and receiving the same guidance from the EC, with any mistakes having potentially huge implications as organisations become liable for unexpected amounts of regulated spend potentially pushing putting them unintentionally into a breach of the regulations. We personally had experiences of working with organisations where we flagged that we had identified work as potentially regulated, when they had been through the same exercises as us and come out with a different answer.

The reality of the situation is such that, when organisations such as FOE contact the Electoral Commission, the body that will decide whether or not activity is regulated should an investigation occur, they are unable to give a clear answer and will only suggest certain activities are “likely” or “unlikely” to be regulated – even though they are the ones who will make the final judgement. While it is understandable that in some instances it will depend on the nature of the final product, where this pertains to, for example activity that has already occurred and needs to be considered retrospectively in a snap General Election, the answers still remain as “likely” or “unlikely”. For smaller organisations, especially those that are not in and of themselves “campaigning organisations”, or perhaps because they are primarily concerned with service delivery rather than advocacy and therefore unused to these levels of risk, this is not a reasonable environment for them to be operating in. Many organisations faced with the maximum reassurance that activity was ‘unlikely’ to be regulated may still decide not to proceed and be ‘chilled’.

4. **How confident is your organisation in navigating electoral law? Are there elements that you think are difficult to follow?**

Despite being a large campaigning organisation with dedicated and experienced public affairs staff we still find navigating electoral law a time consuming and often confusing process, which requires careful judgment and an organisational willingness to accept a level of risk of unintentionally breaching the legislation, in order simply to undertake campaigning and advocacy activity which is an essential part of a functioning democracy.

We have members of staff with a good grasp of responsibilities under PPERA as amended by the Lobbying Act, and have implemented systems and processes that allow for the organisation to ensure we are following it to the best of our ability.

However, there are a number of serious issues with electoral law that make it incredibly, and unnecessarily, onerous to follow, contribute to the well documented chilling effect e.g.[2,3,4], and at times impossible to feel confident you are doing the right thing:

- **The Fixed Term Parliament Act (FTPA) and regulated period.** Under PPERA, the regulated period for NPCs is 1 year before the date of the election. We believe this to be excessive as it hugely impacts the work of organisations who have no intention (and are often legally not allowed to, under the Charity Commission) of influencing voter intention, and it should be brought in line with the 4 month regulated period for devolved and European Parliament elections, as is recommended by Lord Hodgson in his 2015 review. While the period has always been too long, under the FTPA it should at least be predictable. However, despite the introduction of the FTPA in 2011, the 2015 General Election has been the only one held with a date dictated by the Act, and even then the regulated period was shortened to 7.5 months to allow campaigners time to familiarise themselves with the new regulations as a result of the Lobbying Act. The 2017 and 2019 elections were both called with less than 2 months' notice of the election date, and the current Government intends to repeal the FTPA legislation. This means that NPC's have at the 2017 and 2019 General Election faced the absurd task of looking backwards at activity already undertaken with no knowledge that an election would take place to see if it retrospectively constituted regulated spending. This creates the bizarre possibility that when an election is called an organisation could have already breached the regulations. EC guidance ahead of the 2019 GE made this less likely, however it remains a possibility, especially when the 'other relevant elections' rule is taken into account. This is explored more below.
- **The 'purpose test'.** The purpose test states that if activity "can be reasonably regarded as intended to influence voters to vote for or against a political party or category of candidates". FOE is explicitly not party-political. Both during and between electoral periods, part of the work of FOE is to push all political parties to be more ambitious in their environmental policy. This involves working with governing, official opposition and other parties. Despite this, activity can still fall under the purpose test. However, despite efforts from the EC to clarify with specific guidance for issues-based NPCs and case-study examples, it is a vague and grey concept which is open to interpretation in a number of different ways. This results in confusion and a chilling effect where NPCs shy away from activity they would normally undertake for fear of falling foul of electoral law.
- **Local Caps.** The stated intention of local caps is to prevent campaigns to unseat specific MPs by NPCs. However, the way they are administered is problematic with unintended consequences. The spending limit per constituency is £9,750. However, once this has been reached, it effectively halts all national campaign activity, as this is calculated as [money spent/no. constituencies], with that amount added to each constituency. If you have hit the spending limit for a particular constituency, spending

[2] The Lord Hodgson of Astley Abbots CBE, "Third Party Election Campaigning – Getting the Balance Right", 03/2016, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/507954/2904969_Cm_9205_Accessible_v0.4.pdf

[3] Sheila McKechnie Foundation, "The Chilling Reality", 08/2020, https://smk.org.uk/wp-content/uploads/2020/08/SMK_The_Chilling_Reality_Lobbying_Act_Research.pdf

[4] Commission on Civil Society and Democratic Engagement, "Non-Party Campaigning Ahead of Elections", 09/2015

any more nationally would therefore push you over the limit, even though local and national campaigning are markedly different. This becomes a particular problem where retrospectivity under a snap election is included, which will be explored further below.

- **Retrospectivity.** Under the terms of the Lobbying Act, even if there was no way for campaigners to know an election was going to be called, the regulated period is one year regardless, and therefore comes into effect retrospectively. The guidance from the EC ahead of the 2019 GE[5] somewhat clarified that, if activity was undertaken without the knowledge of the election it would be unlikely to be classed as regulated, which was missing from previous guidance[6] (though they are not able to offer certainty as there is no actual distinction made in the legislation, and it is therefore up to the ECs interpretation of the law at any one time[7]). However, in years where other elections or referenda have taken place within the retrospective regulated period (even those that are regulated under the RPA), activity around those will count towards regulated spend if they pass the public and purpose tests. This adds huge complexity. For example, the 2019 General Election was called on the 29th October 2019, with polling day on the 12th December 2019. The regulated period was therefore from 12th December 2018 to 12th December 2019. This then brought 2 other elections within the regulated period – the European Parliamentary election on 23rd May 2019 and the local elections held on 2nd May 2019[8]. While European Parliamentary elections are already covered by the Lobbying Act, local elections fall under the Representation of People Act (RPA). However, because of the snap election, campaigning activity undertaken during this election then came within the scope of the regulated period for the General Election. Essentially this means that at any election, whether it is specifically covered by the Lobbying Act or not, you may be incurring regulated spend if a snap General Election is subsequently called. When added to the issue of local caps, as outlined above, you could potentially have hit a local cap, without registration, during an election that wasn't previously regulated under the Lobbying Act, which means you have broken electoral law and are unable to undertake any national activity that is regulated. This is evidently an entirely unworkable aspect of the legislation.
- **Joint Working.** The nature of issues-based NPCs is such that they frequently work together and collaborate to better campaign on issues and support one another. This is particularly so for smaller grassroots organisations who will pool resources, or work with larger organisations on a specific issue. The aggregation of spend means that a small voluntary group with small or no funds working in coalition with other organisations in a coalition could end up breaching the registration threshold even if they only spent, say £50. Even large organisations will, in our experience, avoid undertaking joint working which incurs regulated spending during a regulated period. This serves to amplify all the above issues of struggles to interpret the law with any certainty and a complex and confusing way of apportioning cost, and merely results in

[5] "UK Parliamentary General Election 2017: Non-party campaigners", The Electoral Commission, 2017, https://www.electoralcommission.org.uk/sites/default/files/2019-11/Non-party%20campaigner%20UKPGE%202019.pdf

[6] "UK Parliamentary General Election 2019: Non-party campaigners", The Electoral Commission, 2019, https://www.electoralcommission.org.uk/sites/default/files/pdf_file/UKPGE-2017-Non-party-campaigner-election-specific.pdf

[7] The Electoral Commission, 2019, page 8

[8] The Electoral Commission, 2019, page 5

civil society organisations being shut out of campaigning at a time when it is crucial (examples of which can be found in Lord Harries 2015 Commission on Civil Society and Democratic Engagement report[9]), the voices of those they represent going unheard, and the stalling of work of coalitions and informal networks afraid to accidentally push each other over the registration limit. A report by the Sheila McKechnie Foundation found that a third of organisations "reported a negative effect on coalition building" as a result of the act, and that "several organisations identified the impact on coalition working as the biggest issue with the Act because it had directly stopped activity from happening. The impact was felt most acutely by smaller organisations and churches".[10] The working together rules are entirely unworkable and no amount of effort from the Electoral Commission will fix this without changes to the law. As Lord Harries wrote in his 2015 report "the current position strikes the wrong balance by having a disproportionate effect on the democratic ability of smaller groups to join together on issues that they have in common."[11]

Taken individually, each of these areas cause significant problems for issues-based campaigning organisations and charities, as they fundamentally misunderstand the nature of the work, however they are manageable. It is when they are taken together, as they necessarily are during regulated periods, that the legislation becomes disproportionately onerous and restrictive, leading to a chilling effect on civil society organisations (as evidenced in Lord Harries' report and the report by SMK [12] [13]).

5. **Should there be consolidation of the law that 'non-party campaigners' are required to follow in the Political Parties, Elections and Referendums Act (PPERA) and the Representation of the People's Act (RPA).**

We do not hold firm views on this matter, and it would be easier to respond to a specific proposal.

In his review, Lord Hodgson recommended moving to the RPA definition for regulated spending, which we will address in answer to question 9.

Friends of the Earth is a party-political impartial organisation and would not incur spending under the RPA.

6. **What are your views on the regulated period for general elections? Does this present any difficulties for you?**

Please see answer to Question 4. We would advocate the regulated period for General Elections be shortened to 4 months, in line with other elections regulated under PPERA, and

[9] Commission on Civil Society and Democratic Engagement, 2016
[10] Sheila McKechnie Foundation, 2020, page 6
[11] Commission on Civil Society and Democratic Engagement, 2016, page 14
[12] Sheila McKechnie Foundation, 2020
[13] Commission on Civil Society and Democratic Engagement, 2016

Lord Hodgson's recommendation. In the case of a snap election, the regulated period date should begin from the day the election is called if this is shorter than 4 months.

7. **What would be the impact on your organisation if the threshold for registration with the Electoral Commission was lowered?**

The threshold for registration with the EC is already low. FOE has registered with the EC for the last 3 elections and kept logs of regulated activity, therefore the impact would likely be minimal, though it would increase the likelihood of retrospective breaches.

However, the lowering of the threshold would likely mean that significantly more NPCs are required to register. Monitoring regulated activity takes up considerable resources – in the 2017 election the FOE staff member acting as compliance lead spent 5 ½ of the 7-week regulated period on compliance activities. This meant that her other work had to be paused and that her day-to-day, unregulated activities, could not be carried out. While this created problems and directed resources away from our core activities to compliance, FOE as an organisation was able to function. There are many, smaller NPCs where the burden of compliance requirements means they either must stop substantial amounts of work to redirect resources, or simply avoid undertaking regulated activity to avoid the possibility of registering. The knock-on impacts to unregulated work, and the chilling effect of the regulations, are already a substantial problem for the sector, and this would be worsened considerably by any lowering of the registration threshold.

8. **Do you have any views you would like to share on the Electoral Commission's approach to enforcement of electoral law?**

As we touched upon in our answer to question 3, one of the issues we encounter is that it feels as if the enforcement and advice functions are entirely separate. There may be some legitimate reasons for this, but it can impact on NPCs willingness to undertake regulated activity. When seeking advice, the best an organisation can usually hope for is that something is "likely" or "unlikely" to be regulated, faced with that uncertainty many organisations will err on the side of caution. As we state earlier in our submission, it is difficult to understand how the same body can be unable to give a clear answer on whether activity is considered regulated whilst also being responsible for making a judgement on this when it comes to enforcement.

The impression that we have had over the last few years, and one that feels common amongst civil society organisations, is that registering at all puts NPCs at risk as you are then on under scrutiny by the EC. Once you have registered, the process becomes complex, requiring multiple reports and accounts of spending. As is clear from our experience in 2015, it can be easy to slip up if you are not familiar with the regulations, and as you are already under the purview of the EC you will be pulled up for having broken electoral law for administrative errors. It is also our impression that the EC is constrained by a small budget, and therefore has a limited ability to investigate organisations that do not register at all. This can therefore put organisations who are seeking to follow the regulations to the best of their ability under an increased level of scrutiny, while those who would prefer to fly under the

radar are able to. It feels that, at times, the ECs approach to enforcement due to limited resources catches the low hanging fruit.

To understand the chilling effect that the regulations and accompanied threat of enforcement carry, the fundamental difference between the work of political parties and NPCs (specifically non-party political campaigning organisations and charities) is key. Political parties exist to seek election and must campaign to do so. For the NPCs who may also be a charity delivering services to vulnerable citizens, say, for whom campaigning or advocacy is not their primary purpose there is the option of non-engagement with an election period. However, to not engage in an election period will mean that organisations lose the ability to ensure that their issue, or the voices of those they advocate for, is heard, and addressed during the electoral period. How salient an issue is during an election and the airtime it gets are hugely impactful on the work of NPCs. The risk of engaging in the work and then being accused of breaking electoral law (even if just for a minor administrative infraction) is therefore one that can be shied away from, though it comes at a cost. This is particularly the case for organisations where they advocate for marginalised or vulnerable communities, or those who's campaigns conflict with the interests of the most powerful in society, or who's opponents have access to newspapers and other media from which to broadcast that the organisation has broken electoral law (again even if the infraction is minor). Organisations are therefore risking both a fine and reputational damage, which could impact on their ability to provide services to the community. All of this serves to create an environment where to engage in legitimate activity during an election feels illegitimate and risky, where a small mistake could lead to a fine, massive reputational damage, investigations by the Charity Commission and accusations of being party political. It is in this context that the regulations create a chilling effect on NPCs that is not felt by inherently political organisations or parties. FOE is a campaigning organisation, accustomed to dealing with robust opposition, and we are also not a charity with service provisions, so the risk for us is somewhat lower, but is still one of the largest concerns for us when dealing with these regulations.

Electoral regulation is clearly not up to the job of regulating campaigning around elections and referendums and this is primarily the fault of poorly drafted law rather than the Electoral Commission. The risk to issues-based, non-party political NPCs is clearly disproportionate, and the organisations that are struggling with it the most are not the organisations that would, or even are able to, seek to influence election outcomes as a result of spending.

9. **Are you aware of Lord Hodgson's 2016 report, *Third Party Election Campaigning - Getting the Balance Right?* Would you endorse any of his recommendations?**

The Hodgson report laid out a variety of recommendations, none of which were taken up by the government. It is of considerable disappointment that on an issue as fundamental as how civil society engages with the democratic process not only has the Government entirely ignored the findings of the statutory review of the legislation but has also ignored the recommendation of the House of Lords Select Committee on Charities that Lord Hodgson's

recommendations be implemented in full[14]. We endorse the central finding of Hodgson, that he "does not believe the right balance has been struck in the rules", but believe, with the experience of 2 further general elections to reflect on since the report, we should go back to the full report, along with the recommendations from Lord Harries, and the views of civil society organisations themselves, and look afresh at what changes need to be made.

That being said, we highlight below a few of Hodgson's recommendations on issues we see as essential to being changed to render the regulations fit for purpose.

We would particularly like to highlight that we endorse Lord Hodgson's first recommendation that restrictions are necessary on third party expenditure. FOE does not advocate for a complete removal of regulation for third party campaigners, however the focus of the 2014 legislation was entirely wrong. It means that lobbying still goes effectively unregulated, while a major new structure has been put in place for civil society. It is failing to deal with the real problem at elections, which include the large amount of uncontrolled spending, particularly on social media. This is legislation which has charities, campaigning organisations, and local association in knots, while well-funded lobbying organisations can continue broadly business as usual.

In recommendation 5 Hodgson asserts that the current exclusion for "committed supporters" is no longer workable due to the massively increased use of social media, while member communications should continue to be excluded from regulation. The actual definition of committed supporters versus members is one that is complicated for organisations such as Friends of the Earth, who have a network of local groups and climate action groups, supporters who pay a monthly donation, supporters who give ad hoc donations, supporters who regularly take all our online campaigning actions and those who are on our email lists for other reasons.

As we have addressed earlier in our submission, we endorse Lord Hodgson's recommendation 7, that the regulated period for general elections for third parties be reduced to 4 months, bringing it in line with that for the European elections and those to devolved legislatures

In recommendation 17, Lord Hodgson addresses the issue of joint campaigning, stating that "the current legislation governing joint campaigning needs to be reviewed in the light of the stated aims of what it seeks to achieve. The legislation should focus on preventing avoidance of the spending limits with as much clarity and simplicity as possible based on the proposals above". We agree with Lord Hodgson in this regard. The aim of the legislation in this area is anti-avoidance, to prevent organisations campaigning jointly but pretending not to in order to be able to spend more. As is clear from his report, the current regulations serve predominantly to prevent organisations going about their business-as-usual coalition work during regulated periods and chilling the ability of small organisations to become involved in campaigning periods.

[14] Select Committee on Charities, "Stronger charities for a stronger society", 2017, https://publications.parliament.uk/pa/ld201617/ldselect/ldchar/133/133.pdf

10. Do you have any additional comments that you wish to make or any additional information relevant to the CSPL review?

FOE has campaigned for changes to the Lobbying Act since it was first introduced as a Bill in 2013, we have been clear it is a problem from the outset. The conclusions of successive reviews, reports and inquiries have confirmed this analysis. The Lobbying Act did not address the need for regulation and transparency of lobbying while placing a significant barrier to legitimate civil society, charities, and campaigning organisations to speak out and advocate on crucial issues during elections. As stated above, the EC is in need of reform and greater resources, but this must be alongside reform of electoral law to ensure it addresses the real problems with our democracy such as the lack of regulation of online political advertising and social media (as well as a number of other potential loopholes[15]) rather than restricting civil society.

Dave Timms
Head of Political Affairs
Friends of the Earth England, Wales and Northern Ireland

Rosemary Harris
Political Campaigner
Friends of the Earth England, Wales and Northern Ireland

We should be grateful if you would send your reply to CSPL at public@public-standards.gov.uk by Friday 20 November.

[15] Electoral Reform Society, "Fair elections under threat? The Loophole List", October 2019, https://www.electoral-reform.org.uk/wp-content/uploads/2019/10/Fair-elections-under-threat-The-Loophole-List-1.pdf