

From: compliance@libdems.org.uk

Date: Wed, 28 Feb 2024 at 10:00

Subject: Compliance Training Day 28 - Frequently Asked Questions

COMPLIANCE
AND DATA
PROTECTION

Liberal
Democrats

Dear Chairperson / Treasurer,

On the penultimate day of the February Compliance Challenge, we bring you a Q&A on donation reporting. Please read on for answers to ten common queries.

Frequently Asked Questions

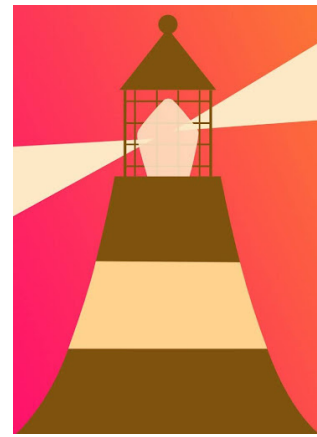


1) What are the donation reporting thresholds?

It is mandatory for treasurers to declare any donations or gifts valued at **£500 and above** and check they are from **permissible donors**.

It is recommended (for internal and audit purposes) that you record items valued **over £100** on Lighthouse. It is not compulsory to include them in the monthly report, so a nil return may be submitted (provided there are no donations of £500 or more). You do not need to check whether such a donation has come from a permissible source, though it's good practice to do this anyway for larger amounts.

2) How do I get help with Lighthouse?



For Lighthouse issues, please consult:

- The [user manual](#)
- Your local Lighthouse **superuser(s)**
- Raise a problem report within Lighthouse
- support@libdems.org.uk
- Your **Chairperson** - since they're jointly responsible for Compliance, they should have the necessary user access to submit returns if the Treasurer is unable to do so by the monthly deadline (**10th**).



3) **PPERA only covers donations above £500, so why do we have to include items that are £500 too?**

Whilst the law states “*over £500*,” the Compliance Team specifies **£500 and over**. This is because the Lib Dems need to demonstrate to the Electoral Commission that we’re checking donors are not deliberately engineering payments of exactly £500 to get around the law and evade permissibility checks.

IMPORTANT: the Electoral Commission's advice is not given with individual treasurers in mind. **The Compliance Team is your first point of contact**, so do let us know if you have any questions.



4) How do I record a donor's total contributions over a year?

Treasurers should treat donations as separate items and not combine them.

The only exception is if they are from the same donor on the same day. (thus report as a single donation to the local party).

Treasurers are required only to record donations as received, no need to keep track of a cumulative/running total for the year.

Aggregation is dealt with at our end so treasurers are to report as above and leave the rest to us.

The Electoral Commission requires HQ (the Compliance Team) to be responsible for aggregation and have processes in place to track reported donations across all the accounting units of the Liberal Democrats (local/regional/state/federal parties and organisations).



5) How do I report a donation from a company / organisation?

For **Limited Companies**, all three conditions must be met to be a **permissible donor**:

1. Search the [Companies House](#) website for their Registration Number
2. Check their Registered Office is in GB & NI
3. Provide evidence that they are actively trading

For **Council Groups** - the address needs to be that of the Council Offices.

For others, please

email: compliance@libdems.org.uk



6) We have a potential donor who wishes to remain anonymous. What can we do?

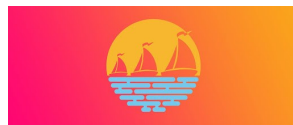
It is not possible to keep a donation / donor's identity secret, as they must be recorded for legal reasons.

This should be explained to the prospective benefactor - if they insist on anonymity (i.e. their

donation details not be reported to the Electoral Commission), then you would have to return / reject the donation(s).

Conspiracy to disguise a donation is a criminal offence - including discussing with the donor ways to make donations below the mandatory reportable threshold so they are not declared.

Regardless of the amount (and especially when it's a significant contribution), it's safer not to accept the donation(s) where the patron does not wish for their identity to be revealed.



7) How do I deal with online donations?

Donations received via a Fleet webpage are automatically entered into Lighthouse for you. However, **you still need to carry out a permissibility check** for donations of £500 or more.

NOTE: donations are paid over to your local party / group once a month, together with the membership rebate, minus transaction fees.

Please consult Lighthouse (***Finances > Membership Rebates***) for a summary of this, as well as the Tech Team's [guide](#).

Queries about online donations should be directed to: support@libdems.org.uk.

8) Which boxes should I tick when declaring my monthly return?

→ For **nil returns** - Box 1 needs to be ticked (or all three)

→ For **reporting donations** - Box 2 should be chosen (or you can tick Boxes 2 and 3)

→ For **reporting loans** - Box 3 must be marked as a minimum

*I certify that this Accounting Unit did not receive any recordable or declarable donations or credit facilities during the month of this PPERA record (stated above) **[NIL RETURNS]***

*I certify that this is a true and accurate record of all transactions covered by PPERA for my Accounting Unit for the above period **[REPORTED DONATIONS]***

*I certify that this is a true and accurate record of any changes to regulated credit facilities during the above period **[LOANS etc]***

9) Why is the status of my donation report showing as “submitted” but not “approved”?

The *approved* status is something we sometimes use internally - so long as it's showing as either *submitted* or *approved*, it's fine as we treat them as the same. Once a return has been sent through to us, your job is done.



10) I'm a Treasurer and will be away so I'll miss the next deadline. Can I just complete the monthly declaration upon my return?

No - as the **Chairperson has joint legal responsibility** for Compliance, they should be submitting PPERA reports in the Treasurer's absence.

As always, if you have any questions, please contact: compliance@libdems.org.uk

Best wishes,



Nazmin Khan (she/her)

Compliance and Data Protection

Administrator

Liberal Democrats

You can find resources from the recent Treasurer Training Day by clicking here:

[View Resources](#) →

And you can view all the emails from the February Compliance Challenge so far by clicking here:

[View previous emails](#) →

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