

Vijay Rangarajan
Chief Executive
Electoral Commission

By email: pef@electoralcommission.org.uk

20 September 2025

Dear Vijay,

LABOUR TOGETHER: REQUEST FOR INVESTIGATION

I am writing, on behalf of the Conservative Party, to request that the Electoral Commission opens an investigation into the alleged actions of Morgan McSweeney and the members' association, Labour Together.

New information has come to light that raises the question of whether a criminal offence has been committed, such that the Electoral Commission would wish to initiate a formal inquiry and then to refer the incident to the police.

The previous investigation for hiding donations

Morgan McSweeney was Secretary of Labour Together – the role responsible for compliance and administration, from 10 July 2017 to 4 April 2020.¹

As you will be aware, in September 2021, the Electoral Commission found that Labour Together broke the law by failing to report £739,492 of political donations. The Commission fined Labour Together £14,250 for (a) failure to deliver donation reports within 30 days of accepting donations, (b) inaccurate reporting of a donation, and (c) failure to appoint responsible persons within 30 days of accepting donations.²

These funds were used by Labour Together in a sustained political campaign to bring down Jeremy Corbyn and secure the election of Keir Starmer as leader of the Labour Party. Only after Keir Starmer had seized control of the Labour Party, in November 2020, and after Morgan McSweeney had joined the Labour Party as Starmer's Campaigns Director, did Labour Together approach the Electoral Commission to report the late donations.

The lawyers representing Labour Together blamed “human error and administrative oversight” and that their client had been as “open and transparent” as possible.³ The Electoral Commission will hold the full copy of this letter, which has not previously been placed in the public domain.

¹ Companies House, *Labour Together LTD*, ([link](#)).

² Electoral Commission, *Monthly update – concluded investigations (September 2021)*, September 2021, ([link](#)).

³ Letter from Gerald Shamash of Edwards Duthie Shamash to the Electoral Commission, cited in the *Sunday Times*, 12 November 2023, ([link](#)).

New information on how the Electoral Commission was misled

The Conservative Party has now seen the internal correspondence between Morgan McSweeney (corresponding from a Labour Party email account) and Gerald Shamash⁴ of solicitor Edwards Duthie Shamash. We assume that this email has been passed from within the Labour Party to outside sources. This correspondence relates to how the Electoral Commission should be handled after the Commission had initiated its formal investigation.

On 3 February 2021, Mr Shamash advises Morgan McSweeney:

- “The amounts of the late reported donations is £739,492 and there are in my view, no easy way to explain how LT [Labour Together] finds itself in this situation.”
- “The legislation is clear that notwithstanding LT should have reported.”
- “The advice from the EC was that LT as a members association LT needed to continue to register.”
- In that light, he recommends a strategy where “best to simply base our case as to the non-reporting down as admin error.”
- The current Home Secretary, Shabana Mahmood, is quoted that she recalled a meeting with Labour MPs in early 2019, where Morgan McSweeney told them that donations to Labour Together had to be, and were being, reported to the Electoral Commission.
- But, based on information from Shabana Mahmood and Steve Reed [current Local Government Secretary, who is in charge of electoral law], he notes that the intent of Labour Together was otherwise – to hide the donations “to protect Trevor [Chinn] as donor and director”.
- Discussion is made of a legal strategy to hide Morgan McSweeney’s name – “we need to be careful”, “I hope [to] minimise publicity”, and steps are taken “without raising their [EC's] suspicions”.
- There is discussion of a notional conversation with the Electoral Commission in 2018 (incidentally, of which the Electoral Commission has no record⁵), where it is recommended should not be referenced given it would result in a “defensive approach” by the Electoral Commission; the advice is also that such an approach would be inconsistent with the reporting of a donation in August 2018.

I believe there is a strong public interest that this information is available in the public domain, given it seemingly contradicts previous statements made by Labour Together, and relates to the breach of political finance laws.

⁴ Now Lord Shamash, having been made a Labour Party peer, nominated by Keir Starmer, in February 2024 (*Downing Street press release*, 9 February 2024, [link](#)).

⁵ As evident from Electoral Commission, *Reference FOI-166-23*, December 2023, ([link](#)).

Alongside this, the Electoral Commission has released under the Freedom of Information Act⁶ details of a phone call (rightly logged by the Electoral Commission under their case management system) of 14 November 2017 making clear that donations had to be reported.

“Labour Together have not been reporting donations to us, Mr McSweeney was under the impression that Labour Together did not have to report because they do not campaign. However, Labour Together is a registered MA on our system. Mr McSweeney says they are not a members association and so this is where the confusion started... I advised him to report the donations to us with a cover letter saying why they had not been reported sooner and said that if the details in the system are wrong, we can review it.”

In addition, the FOI shows that this was followed by an email of 6 December 2017 to Morgan McSweeney making this totally explicit.

“During our conversation on this matter (14/11/17), I said I would look into the question of whether Labour Together is a Members Association.

“The definition of a Members Association is: an organisation that is not a political party, but it is wholly, or mainly, made up of the members of a political party. As the board of Labour Together is mainly made up of Labour Party Members, it is considered to be a Members Association.

Under the Political Parties, Elections and Referendums Act 2000 (PPERA) there are rules that certain organisations must follow in relation to donations and loans that they receive in connection with their political activities, which include such activities as promoting or developing policies for adoption by a political party, or promoting the candidacy of an individual for internal party office. Groups that are wholly or mainly made up of members of a registered political party but exist outside that party’s constitution are subject to these rules. Under PERA, members associations fall under ‘regulated donee’ rules.

Members associations do not need to register with the Commission. However, they can only accept a donation or enter into a loan over a certain value if it comes from certain, mainly UK-based sources... For any permissible reportable donation, a members association has up to 30 days from the day they accept it to report the donation to the Electoral Commission if the value is over £7,500 (or the donation is over £500 and aggregates with others from the same donor to over £7,500).”

Schedule 7 of PERA is crystal clear that the members’ association must report donations if they are engaged in:

*“(a)promoting or procuring the election of any person to any position in, or to any committee of, the party in question;
(b)promoting or procuring the selection of any person as the party’s candidate for election to a relevant elective office; and
(c)promoting or developing policies with a view to their adoption by the party.”⁷*

Labour Together met each of those tests, in particular, helping secure the election of Keir Starmer as Labour Party leader. Unreported donations received by Labour Together include

⁶ Ibid.

⁷ Legislation.gov.uk, ([link](#)).

£147,500 of donations during the period of the 2020 Labour Party leadership election when Morgan McSweeney was Secretary.⁸

In this new evidence which has come to light, there is discussion of Morgan McSweeney's 'defence' that "LT was not at that time a campaigning organisation, was inward facing, had no public meetings, acted as a think tank without a Twitter account". But the lawyers are then explicit that "the legislation is clear" and "LT should have reported" the donations. The statutory tests above are obvious that just being 'inward facing' does not exempt one from the requirements to report donations.

The implications of this new revelation

Taken together, one could draw the following inferences:

- Labour Together and Morgan McSweeney were told they needed to report donations.
- They chose not to report those donations, as they did not want the Corbyn-led Labour Party to know who was bankrolling their secretive political campaigning, and to keep their work below the political radar. Whilst their donors could have faced intimidation from the hard-left, that is not justification for breaking the law.
- Once the Electoral Commission was investigating the case, a false excuse of administrative errors was concocted to minimise the sanctions they faced and the bad publicity. Morgan McSweeney's name was airbrushed out of the picture.
- The Home Secretary and the Local Government Secretary (in charge of criminal law, and political finance law, respectively) have been embroiled in this cover-up.
- The Electoral Commission was knowingly misled.

Potential for a criminal investigation

The Political Parties Elections and Referendums Act 2000 provides for a criminal offence under paragraph 13(3), Schedule 19B, of knowingly or recklessly providing false information to a person authorised to investigate possible offences under PPERA.⁹ There is no risk of double jeopardy in this case, given it would clearly be a separate offence to the substantive failure to report political donations (that was subject to the £14,250 variable monetary penalty).

In addition, for a members' association, under Schedule 7, Part II, Section 9, (Evasion of restrictions on donations), alongside Section 61, a person commits an offence if they knowingly "does any act in furtherance of, any arrangement which facilitates or is likely to facilitate, whether by means of any concealment or disguise or otherwise, the making of donations."¹⁰

Schedule 20 of PPERA provides that providing false information is an "either way" offence; there is therefore no time limit for bringing proceedings.¹¹

Section 153 of PPERA provides that any officer of an unincorporated association may be liable of being guilty of an offence if the act was committed "with the consent or connivance of, or to be attributable to any neglect" of the officer.¹²

⁸ Now listed on the Electoral Commission website (reported late in December 2020), with references C0526176, C0526179, C0526178, C0526184.

⁹ Electoral Commission, *Offences and proposed sanctions*, ([link](#)). and *Legislation.gov.uk*, ([link](#)).

¹⁰ *Legislation.gov.uk*, ([link](#)), ([link](#)).

¹¹ *Legislation.gov.uk*, ([link](#)).

¹² *Legislation.gov.uk*, ([link](#)).

I believe there is sufficient evidence for the Electoral Commission to consider this new evidence which has come to light, and whether a criminal offence has been committed in this case, and if so, refer the matter to the police. Given such a potential offence would directly relate to hindering the Electoral Commission, the police would need to rely on all information held by the Electoral Commission, to be read alongside this new evidence.

We seek your reassurance that the Electoral Commission will not hesitate to use its statutory powers under Schedule 19B of the Act to compel Morgan McSweeney, Sir Keir Starmer, Shabana Mahmood, Steve Reed, the Labour Party, and any other individuals or organisations involved, to provide an explanation together with information and documents for the purposes of this investigation.

I am placing a copy of this letter in the public domain. I look forward to your response.

Yours sincerely,

A handwritten signature in black ink that reads "Kevin Hollinrake". The signature is written in a cursive, flowing style.

Kevin Hollinrake MP

Chairman of the Conservative & Unionist Party

Attached: the new evidence