

05 March 2026

Matt Western MP
Chair
Joint Committee on the National Security Strategy

Sent by email

**Angela Craggs
T/Commander**

New Scotland Yard
Victoria Embankment
London
SW1A 2JL

Dear Matt,

Thank you for your letter to the Commissioner of 12 February 2026 regarding the risks of foreign interference in the UK's political finance system. I am replying as T/Commander for Central Specialist Crime, which has responsibility for the Special Enquiries Team.

The MPS welcomes the Committee's interest in this important issue and the opportunity to assist with your work.

The MPS – specifically, the Special Enquiries Team – plays a key role in enforcing the political finance regime. Protecting the integrity of the UK's democratic processes is a matter we take extremely seriously, and we remain committed to working with partners across law enforcement and government to ensure the system is robust and effective.

For ease, we have set out our responses to the Committee's specific questions in the annex to this letter. As you will appreciate, some of the matters raised by the Committee inevitably touch on sensitive operational arrangements. Should it be helpful, we would of course be happy to provide further detail in a confidential setting.

Yours sincerely,



**Angela Craggs
T/Commander**

ANNEX

1. What role does the MPS (and specifically the Special Enquiries Team) play in investigating suspicions of foreign money in political finance? Please include reference to party donations, contributions to individual members or candidates, campaign spending and regulated third-party spending.

The Special Enquiries Team (SET) investigates alleged breaches of electoral and political finance laws within the MPS area. It also picks up cases that are particularly sensitive or high profile, such as those involving donations to political parties, candidates or third-party campaigners.

In recent years, many of SET's political finance investigations have included some form of international element. This can range from foreign nationals donating through UK-based intermediaries to UK nationals using overseas banking systems. The extent and significance of this international involvement vary from case to case, and it is important to note that an overseas link does not, on its own, indicate any connection to a hostile state.

2. What is the relationship between the Special Enquiries Team and Counter Terrorism Policing (CTP) units working on state threats?

a) Please could you explain how the Special Enquiries Team engages with CTP if a political donation appears to involve a foreign source of funds, or a foreign individual?

The involvement of a foreign donor or foreign funds does not, in itself, trigger engagement with CTP. SET is able to investigate these matters in full, including working with the National Crime Agency where cases involve complex structures or cross-border financial activity.

SET would only engage CTP where there are clear indications that a case may involve hostile state activity. In the absence of those indicators, foreign links alone are not sufficient to prompt CTP involvement.

b) Is such engagement generally limited to formal investigations, or do you operate regular joint intelligence sharing mechanisms outside formal investigations?

SET/CTP engagement is determined by the facts of the case, occurring only where the relevant national-security criteria are met.

c) How does this engagement compare to your relationship with MI5 more widely? (We note these issues are sensitive. We can facilitate a sensitive private response from you if that would be helpful).

The MPS maintains appropriate contact with the Security Service vis-à-vis matters that involve potential state-threat activity. Given the sensitivity of these arrangements, we would be happy to provide further detail in a confidential setting if required.

3. What is the Special Enquiries Team's relationship with other relevant police bodies, for example, the National Police Chiefs' Council, and the National Lead for policing elections?

The City of London Police is the national lead force for policing elections and delivers national guidance and training through the Economic and Cyber Crime Academy, including specialist courses on investigating electoral fraud. SET works closely with the NPCC and benefits from this national capability.

4. How does this relate to the role played by local police forces?

a) At what stage would local police escalate the matter to the MPS or others?

Local police forces are responsible for investigating allegations that arise within their own jurisdictions. Complexity or sensitivity does not, on its own, lead to a case being escalated to the MPS; escalation only occurs where the jurisdiction or particular sensitivities fall within the MPS remit. All forces follow national crime-recording standards and established pathways for escalation where appropriate.

5. Would it be helpful to have a single national law enforcement body in charge of political finance?

Responsibility for enforcing political finance rules is currently shared across several bodies, including the MPS, local police forces, the National Crime Agency and the Electoral Commission. A single national enforcement body could, in principle, offer greater consistency, capability and coordination. Any move in that direction, however, would require clear statutory responsibilities, appropriate resourcing and careful consideration of how best to integrate existing expertise across agencies.

6. Since 2015, how many political finance referrals have you received from:

- a) the Electoral Commission;*
- b) other public sector organisations;*
- c) other sources?*

Due to the way data was previously recorded on legacy systems, we are unable provide historic figures. In 2023, SET introduced a new recording framework to address these limitations and improve the consistency and accuracy of its data.

Since then, SET has recorded between 50 and 60 allegations relating to political funding. These have covered a range of suspected offences, including:

- Impermissible donations
- Suspicious funding structures
- Misuse of political funds
- Unreported campaign spending
- Money-laundering concerns or investigations initiated by SARs
- Financial misconduct connected to political office

In 2025, the Electoral Commission submitted a batch of 45 referrals concerning candidate or agent expenses from the 2024 General Election. Of the remaining cases, a further four have also been referred by the Electoral Commission, with the remainder originating from other public sector organisations.

7. What proportion of political finance cases that come to your attention involve suspicions of foreign money or foreign individuals?

A notable proportion of the more complex cases referred to SET feature some form of international element. This may involve donors based overseas, the use of international banking systems or cross-border movements of funds. The nature and scale of any foreign connection vary from case to case.

8. To what extent do you conduct proactive investigations without a referral from other bodies?

Most investigations undertaken by SET arise from referrals made by political parties, the Electoral Commission, other public bodies or members of the public. Proactive investigations are undertaken where appropriate but are necessarily limited by legislative thresholds and the need to prioritise resources. However, where the legal tests are met and the circumstances justify it, SET does initiate proactive activity.

9. Would law enforcement benefit from changes to the Political Parties, Elections and Referendums Act 2000 to ensure that the threshold for investigating criminality would only require 'reasonable grounds to suspect' wrongdoing?

- a) *If so, do you have specific suggestions on which parts of the legislation might benefit from changes of this nature? (For example, Section 54, Section 83, Section 123 or similar?)*

Changes to legislation are a matter for Ministers and Parliament, and it would not be appropriate for the MPS to comment further.

10. We have heard that law enforcement might be able to deploy more intrusive investigative tools and capabilities if there were higher sentences for criminal breach of political finance rules. Would you support higher sentencing? If so, do you have recommendations on which penalties should be increased?

- a) *What level of penalty would be required to facilitate the use of more intrusive investigatory tools? And what would be disproportionate?*

Some political finance offences currently carry relatively low maximum penalties, which can limit our ability to deploy certain investigative powers. Raising the maximum penalties for the most serious offences could enhance access to appropriate investigative tools and, in turn, strengthen the overall enforcement framework, provided proportionality is maintained.

11. We note that the NCA has some particularly helpful powers, such as Unexplained Wealth Orders. However, the NCA typically only deals with a very small proportion of political finance cases. What options are there for the MPS to work jointly with the NCA and Electoral Commission to examine the source of wealth for potentially suspicious donations?

- a) *Would it be feasible to create a standing mechanism for the Electoral Commission / MPS to highlight concerns to the NCA, which then issues an Unexplained Wealth Order to a donor?*

Existing legal gateways already enable information sharing between the MPS, the NCA and the Electoral Commission, and there is established precedent for joint working. A dedicated referral mechanism could be considered, though its design would need to be carefully developed to ensure it remains proportionate, targeted and genuinely adds value.

- b) *Would it be feasible for the relevant information to then be shared back with the MPS / Electoral Commission, or would new information-sharing agreements be required?*

Information sharing arrangements exist that permit controlled onward disclosure by the NCA.

c) *What would be the risks of such an approach (for example chilling effects, or resource implications)?*

Unexplained Wealth Orders are primarily a civil recovery mechanism aimed at addressing unexplained assets, rather than assessing the permissibility of political donations. Applying UWOs in political finance cases would represent a marked departure from established practice and could carry unintended consequences

12. How prepared is the MPS to investigate the use of crypto in political donations, including those obfuscated through mixers or foreign exchanges?

a) *Are there staff within the Special Enquiries Team or related teams with specialist expertise in this area?*

SET has access to specialist financial investigation capabilities and to wider MPS expertise on cryptocurrency. This enables us to investigate matters involving crypto assets, including attempts to conceal the source of donations through anonymity-enhancing technologies or the use of overseas crypto exchanges.

13. We note that foreign entities may move illicit funds into the UK using crypto services, and then convert this into ostensibly legitimate fiat before making a donation. We appreciate that the wider issues around illicit finance are complex and extensive. Do you have recommendations for making such upstream activity more difficult, in order to make it harder for illicit funds to be used in downstream donations?

- a) *If so, would you require any changes to your powers, capabilities, information sharing arrangements or the legislative framework?*
- b) *How much of this do you believe might reasonably fall within the scope of the elections Bill?*

The following activity could assist in preventing illicit crypto-derived funds entering political finance:

- Enhanced due-diligence requirements for political parties on higher-risk donations, including stronger source-of-funds expectations.
- Restricting political donations to UK-registered or regulated crypto-asset service providers.
- Requiring rapid conversion of crypto assets to fiat currency for transparency and auditability.
- Introducing a statutory reporting obligation for political parties where concerns arise regarding a donor's source of funds.



**Joint Committee
on the National
Security Strategy**

12 February 2026

**Commissioner Sir Mark Rowley
Metropolitan Police Service**

[By email]

Political finance and foreign interference

Dear Sir Mark,

The Joint Committee on the National Security Strategy is examining risks of foreign interference in the UK's political finance system. You will be aware of the wider context relating to this work, including the forthcoming Bill on elections.

We took oral evidence from industry experts on 8 September 2025 and 12 January 2026. On 9 February the Committee took evidence from the Director General of the National Crime Agency (NCA) and the Director of the National Economic Crime Centre.¹

We note that the Metropolitan Police Service (MPS) plays a key role in the enforcement of the political finance regime and we regret that a representative was not able to attend the February session. We would therefore be grateful for responses to the following questions:

Governance

1. What role does the MPS (and specifically the Special Enquiries Team) play in investigating suspicions of foreign money in political finance? Please include reference to party donations, contributions to individual members or candidates, campaign spending and regulated third-party spending.
2. What is the relationship between the Special Enquiries Team and Counter Terrorism Policing (CTP) units working on state threats?
 - a. Please could you explain how the Special Enquiries Team engages with CTP if a political donation appears to involve a foreign source of funds, or a foreign individual?
 - b. Is such engagement generally limited to formal investigations, or do you operate regular joint intelligence sharing mechanisms outside formal investigations?

¹ JCNSS, [Defending Democracy](#)



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- c. How does this engagement compare to your relationship with MI5 more widely? (We note these issues are sensitive. We can facilitate a sensitive private response from you if that would be helpful).
3. What is the Special Enquiries Team's relationship with other relevant police bodies, for example the National Police Chiefs' Council, and the National Lead for policing elections?
4. How does this relate to the role played by local police forces?
 - a. At what stage would local police escalate the matter to the MPS or others?
5. Would it be helpful to have a single national law enforcement body in charge of political finance?

Activity

6. Since 2015, how many political finance referrals have you received from:
 - a. the Electoral Commission;
 - b. other public sector organisations;
 - c. other sources?
7. What proportion of political finance cases that come to your attention involve suspicions of foreign money or foreign individuals?
8. To what extent do you conduct proactive investigations without a referral from other bodies?

Legislation

We have heard that law enforcement may be hampered by deficiencies in legislation - including limited penalties (which may restrict the use of intrusive investigative tools), and high thresholds for proving intent.

9. Would law enforcement benefit from changes to the Political Parties, Elections and Referendums Act 2000 to ensure that the threshold for investigating criminality would only require 'reasonable grounds to suspect' wrongdoing?²
 - a. If so, do you have specific suggestions on which parts of the legislation might benefit from changes of this nature? (For example, Section 54, Section 83, Section 123 or similar?)

² We note that this language may be similar to that contained in anti-money laundering requirements. See for example CPS, [Money Laundering Offences](#), April 2024



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10. We have heard that law enforcement might be able to deploy more intrusive investigative tools and capabilities if there were higher sentences for criminal breach of political finance rules. Would you support higher sentencing?
- If so, do you have recommendations on which penalties should be increased?
 - What level of penalty would be required to facilitate the use of more intrusive investigatory tools? And what would be disproportionate?

Joint work on investigations

The Government has proposed requiring donors to have generated sufficient income in the UK (or Ireland) to cover the cost of their donation.³ However, we note that a foreign state-backed entity might still seek to use a permissible UK-based corporate donor as an intermediary. For example, the foreign entity might pay the UK-based company large ‘fees’ for bogus ‘advisory’ services (or similar). This would generate apparently legitimate UK profits which could then be donated. Without targeted scrutiny it remains unclear whether such schemes would be readily apparent, even with Know Your Donor checks in place.

11. We note that the NCA has some particularly helpful powers, such as Unexplained Wealth Orders. However, the NCA typically only deals with a very small proportion of political finance cases. What options are there for the MPS to work jointly with the NCA and Electoral Commission to examine the source of wealth for potentially suspicious donations?
- Would it be feasible to create a standing mechanism for the Electoral Commission / MPS to highlight concerns to the NCA, which then issues an Unexplained Wealth Order to a donor?
 - Would it be feasible for the relevant information to then be shared back with the MPS / Electoral Commission, or would new information-sharing agreements be required?
 - What would be the risks of such an approach (for example chilling effects, or resource implications)?

Crypto donations

12. How prepared is the MPS to investigate the use of crypto in political donations, including those obfuscated through mixers or foreign exchanges?
- Are there staff within the Special Enquiries Team or related teams with specialist expertise in this area?

³ Ministry of Housing, Communities and Local Government, [Restoring trust in our democracy](#), 17 July 2025



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13. We note that foreign entities may move illicit funds into the UK using crypto services, and then convert this into ostensibly legitimate fiat before making a donation. We appreciate that the wider issues around illicit finance are complex and extensive. Do you have recommendations for making such upstream activity more difficult, in order to make it harder for illicit funds to be used in downstream donations?
- If so, would you require any changes to your powers, capabilities, information sharing arrangements or the legislative framework?
 - How much of this do you believe might reasonably fall within the scope of the elections Bill?

In line with usual practice, I will be placing a copy of this letter and your response in the public domain in due course. I would be most grateful for your response by 12 noon on 26 February.

Yours sincerely,

Matt Western MP
Chair, Joint Committee on the National Security Strategy