POLITICAL PARTY AND CAMPAIGN FINANCING IN TRINIDAD &
TOBAGO

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Trinidad and Tobago achieved self governing status in 1956 and its political independence in 1962. Two parties dominated the political landscape between 1956 and 1986, the Peoples National Movement which is based on the Afro-creole population and the Democratic Labour Party (DLP) which was based on the Indo-creole element in the society. The latter party was replaced by the United National Congress in 1976 which was in turn replaced by the United National Congress in 1988. The ethnic base of the party remained essentially the same, and it could in fact be said that for most of its post-independence history, Trinidad and Tobago was and remains a two party system. The exception was 1986 when a new party appeared on the scene and swept the PNM from power. That party however was a coalition of elements that had broken away from the two mainstream parties. Its political shelf life was very limited. By 1988, it had ceased to be a significant political force even though it remained in office until 1991, when it was dislodged by the PNM. Several other small parties have appeared on the scene during the period, but these have not been able to breakthrough the constraints of the first-past the post system, the demographic realities of the society, and the party financing system which these realities helped to foster.

Elections in Trinidad and Tobago are privately funded. The system favours the old established parties which either control the state or can tap into the business community. The system privileges incumbents who can do both. The caps on what can be spent by candidates are extremely low (US$8,000) and are not adhered to. There is no limit to what funds parties can raise or spend, and there are no obligations on the part of donors to declare what they give or on the part of parties to declare what they receive. A free for all exists.

I. EFFECTS OF FINANCING SYSTEMS

Elections now cost a great deal of money, most of which is spent on television, radio and newspaper ads, and on bribing voters. Funds are channelled to the parties in cash donations or in kind (payment for advertising space, for transport, food, professional help, etc). Many firms contribute to all legitimate parties, but have their preferred candidates or party. In the past two years, financing has become more concentrated. A few individuals and firms have emerged which have contributed a disproportionate share of campaign funds, much of which are kick backs from publicly procured projects. A great deal of public attention was focussed on the issue of party financing, in the last 5 years, but there has been no sustained public demand for reform thus far.

II. ACCESS TO THE MEDIA

1 The opinions expressed in this document do not reflect the official position of the Organization of American States.
Access to the media is open, and while there are allegations about bias and partisanship, such bias as exists is in the main subtle. Ads are carried in the public and private media provided sponsors pay in advance and the ads meet media imposed standards of public decency. There is no state regulation of advertising content and no limitation of institutional propaganda by the state or its organs. Incumbent parties however use state and parastatal resources to publicise what they consider to be the achievements of the public sector.

III. Disclosure and Accountability

Most candidates or their agents however file expenditure reports on time and these are published in the media. Disclosure is however legalistic and little attention is paid to reports filed by candidates since all are agreed that these reports do not reflect what happens on the ground in respect of the funding of elections.

Many of the questions posed in the "guide" provided for the analysis of party and election campaign financing do not apply to Trinidad and Tobago. The following additional generalizations can however be safely made:

• Most of the funding that is available for election campaigning and the maintenance of parties in between elections go to the two ethnically based mass parties. The fact that parties are ethnically based and that the electoral system is of the first past the post variety serve to make it difficult for third parties to attract electoral support and therefore funding. If electoral support was forthcoming, funding would flow as was evidenced in the elections of 1986 which were won by a new coalition.

• There have been significant increases in the costs of elections, especially in the last 7 years. Elections have become more closely fought and hi-tech, and money is seen as an important resource. This has served to exaggerate the importance of wealthy donors and their cronies, and to marginalise reform minded parties. This was particularly the case in the elections of 1995, 2000, 2001 and 2002.

• Incumbents have a decided advantage in election campaigns because they have privileged access to financing in kind from firms in the state sector and these which depend on state contracts to ensure viability or increase profitability. Opposition parties complain about this nexus, but are powerless to do anything about it except complain.

• There are no laws which limit institutional propaganda by the state or government during elections. The media are however free and open to all parties which are in a position to pay for their advertisements. All parties, whether in government or opposition, complain of biased or inadequate courage during elections or in between elections. The opposition however complains more loudly.

• There is no regime of regulated slots in any media house. No authorities exist to regulate the content and extent of media coverage. Media houses
have however established a Complaints Council to which representations can be made year round. Few complaints are referred to this body.

- Disclosure levels are extremely low. Demands for reform are often heard, but are not sustained. Trinidadians are very tolerant of errant politicians. Such monitoring as there is by the Elections and Boundaries Commission, the body which supervises elections, and civil society groups is cosmetic. So far as can be determined, there has never been a case of a candidate or party being charged with an election funding offense and made to pay a penalty.

In sum, there is an ingrained culture of non-compliance with such laws as exist, in part because the law about donations and spending limits are unrelated to contemporary realities.

Trinidad and Tobago is a small parliamentary republic which gained its independence from the United Kingdom in 1962. It has a population of some 1.3 million people and an electorate of some 800,000 voters who have gone to the polls in 10 occasions since independence was achieved. There have been four electoral turnovers in those 40 post-independence years. These took place in 1986, 1991, 1994, and 2000.

Most of the laws and regulations for the financing of elections in Trinidad are contained in the Representation of the Peoples Ordinance (RPO) which was enacted into law in 1961. The rules were subsequently modified, the latest amendment being made in 2000. The changes were however minor and related mainly to the amount of money that candidates or their agents were allowed to spend. The pertinent sections of the RPO are contained in an Appendix. What the rules make evident is that candidates or their agents are only legally allowed to spend the princely sum of TT $50,000 (approx. US $8,000). The particular provision of the RPO reads as follows:

No sum shall be paid and no expenses shall be incurred by a candidate at an election or by his election agent on account of or in respect of the conduct or management of an election in excess of the amount of fifty thousand (TT $50,000.00) dollars in the case of a Parliamentary Election or twenty-five thousand (TT$25,000.00) in the case of a Municipal Council or Regional council Election.($US1 =TT6.30)

Candidates or their agents can receive gifts and other contributions for the conduct and management of elections up to a statutory limit of $5,000.00 for general elections. Candidates are also allowed personal expenses, not exceeding five thousand dollars, incurred in connection with the elections. The Ordinance prohibits the incurring of expenses by the promotion and advertisement of the candidate by persons other than the candidate, the election agent persons authorised by the election agent. The rules further require that financial claims against a candidate or his agent must be submitted within twenty-one days after the election result is declared and paid within 35 days. Candidates or their agents must also transmit to the Chief Elections Officer a statement of all payments made, together with bills and receipts within 21 days after the day on which the results of the election is declared.

The returns and declarations are retained by the chief officer and are open to public inspections for a period of two years on the payment of a nominal fee. The penalties for failure to comply or for knowingly making a false declaration are severe, though not in
monetary terms. Failure to file is deemed an "illegal practice" which is punishable by a fine of TT $1,500 and imprisonment for 6 months. The penalty for knowingly making a false declaration which is deemed a "corrupt practice", is a fine of TT $1,500 and imprisonment for 6 months on summary conviction and on indictment, a fine of TT $3,000 or imprisonment for 12 months.

Needless to say, the caps bear no relation to what is actually spent by candidates or by the party on his or her behalf. The rules in fact reflect the fact that when they were first enacted, independent candidates were still the norm and party politics not yet entrenched. While there was always a plethora of parties in Trinidad and Tobago, these were small and in the main personal followings of one or two notables. Nineteen fifty-six witnessed the introduction of disciplined party politics with the formation of the Peoples National Movement. The birth of the PNM brought into being other political formations which sought to match it organisationally. By 1996, independent candidates were the exception and party the rule. The RPO was however not altered to recognise the existence of parties. As such no limits exist as to how much money parties could raise or spend.

There have been frequently and persistent complaints that ruling parties are privileged on the state owned media. National Broadcasting Network, and there is some truth to the assertion. Unfairness and imbalance are alleged in relation to coverage of political meetings, the timing and content of news items, and to editorial or talk show commentary. All parties and their supporters accuse one another of partisanship, especially those in opposition. The government has indicated that it was willing to privatise the station and plans were put in place to effect the sale. The Government has however shelved the planned divestment after having determined that the cost of the severance packages which it would have to pay were prohibitive.

In terms of paid, political broadcasting, there is very little difference between the manner in which the state owned NBN operates and the privately owned radio and television stations. Political parties and friends are required to pay up front for whatever time they wish to purchase. There is no free political broadcasting. A party that fields candidates in one third of the seats is however allocated one free ten minute television and radio broadcast on the state owned National Broadcasting Network at a time pre-determined by the Network.

There is no limit to the amount of money that a party or a group can spend or radio or television during election periods, and parties spend a great deal of money to get their message across. Parties normally buy time on all stations, but do so disproportionately, depending on cost, market considerations, and ownership of the station.

There is some difference in terms of what is done on the two national television stations and on radio. While there are accusations of bias in terms of television coverage, both stations see themselves as being 'national' and try to maintain balance. In so far as there is bias, its incidence is subtle and disguised. The situation is not the same in respect of radio. There are some 14 radio stations, and each caters to different segments of the market which is divided in terms of ethnicity, class, and age. Supporters of the Indo-Trinidadian

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2 Michael Pinto-Duschinsky makes the valid point that spending limits on candidates make sense in first-past-the-post elections but not in elections where candidates are elected as part of a list. Under the list system, voting is for parties and not candidates. Political Financing in the Commonwealth, Commonwealth Secretariat, 2001
based UNC believe that the media was biased against the Indian Community and that the establishment in 1993 of a radio station catering exclusively to the Indo-Trinidadian population was responsible to a considerable degree for the coming to power of the UNC in 1995. The claim in respect of the relationship between the establishment of the station and the UNC's victory in 1995 might be exaggerated, but there is some measure of truth to it.

In the immediate post-independence era the parties received financial and other kinds of support from party membership dues, union contributions, and donations from minority group merchant trading elites who were seeking to constitute themselves as the invisible power brokers who controlled the party leaders. Party supporters also did a great deal of house to house campaign work on a voluntary basis. They believed they were working for a grand ideology or nationalist cause. The island circling motorcade or the whistle stop using railway trains were essential features of the old style "rum, roti and sardine" campaigns. (Ryan, 1972)

Much of that has since changed, and most of what has happened has to do with changes in the style and nature of election campaigns. As has occurred in the US and elsewhere, political campaigning has now become largely an "air war" that is fought via the media, especially newspapers, radio and television. In the 2001 general elections, the ruling United National Congress (UNC) on one day had 20 full page colour ads in two newspapers and 51 smaller ads in other dailies and weeklies. Funds were also expended on posters, handbills, manifestoes and other kinds of promotions by candidates, parties, and friends of parties and of "democracy".

While "ground wars" are still fought by a political infantry, that infantry is now largely a mercenary rather than a volunteer army. In the past much of the door to door campaigning was done by women. This was especially the case in respect of the PNM which had a formidable army which was colloquially known as The “Fat Arse Brigade ”. This phenomenon was less evident in the case of the Indian based parties which relied heavily on communal and trade union bases to rally the faithful and the loyal. Cadres now expect to be paid for work that was previously done because of loyalty to a leader, cause, organisation, or the expectation of a benefit or psychic income. Many underclass voters also expect to be paid, to cast their ballots. Many will not turn out to meetings or vote unless they are given a "T" shirt. These are usually of good quality and bear the image of the candidate and the logo of the party to which he or she belongs. The” T” shirt serves to identify the voter as a member of a political tribe in much the same way as a costume identifies members of carnival bands at carnival time. One should note that political campaigns in Trinidad and Tobago have been profoundly affected by carnival and are characterized by a great deal of music playing, dancing and other modes of merrymaking that are features of carnival.

Political campaigns in Trinidad and Tobago are now very capital intensive and market oriented, and funds to pay media elites, PR experts, spin doctors, and pollsters, many of whom are imported from the U.S. and the UK at high costs, have to be sourced and secured. Party officials estimate that on average, candidates each spend approximately TT $100,000 ($US13,000) instead of the TT $50,000($US8,000) that is allowed and that parties together spend approximately TT $25m($US4m). Much of the money is "wasted" as candidates and parties assume that the more money one spends ,the greater the likelihood of

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3 As an executive member of the Sanatan Dharma Maha Sabha (the majority voice of orthodox Hindus) opined, "no doubt, 103 FM augmented the ground swell of popular Indian support for the 150th Indian Arrival Day Celebrations that virtually launched the political campaign of the Indian based party- the United National Congress" (Newsday, July 8, 2003).
victory. This is of course not the case. Candidates and parties however spend in the hope of winning over voters, especially in closely contested constituencies of which there are only four or five in Trinidad, and one in Tobago.

There are several ways in which funds are secured and channeled to political parties and candidates in Trinidad and Tobago.

- At the most basic level, there are the social fund raisers which are organised by candidates or party groups. These take the form of dinners, parties, or some other type of social activity. These build loyalty and generate activism as they raise money, but the amounts earned are not substantial.

- In election years, major businesses routinely budget and allocate funds to all significant political parties. The justification given is that the competitive electoral system serves to provide the right environment for the conduct of business, and as such ought to be sustained. Democracy is recognized as being expensive. Much of the giving is also justified as prudential practice. One wants access to whichever party wins. The evidence indicates that the incumbent party is generally given more than the out party.

- Many family owned businesses tend to split their support between major parties. That way, the family is always "in power." These firms usually have their preferred parties, candidates, or political elites, and privilege one group more than the other. Businesses are also known to adopt or sponsor particular candidates. Ethnicity, past favours given or expected are factors that would determine the pattern of distribution, especially since there are no ideological differences that differentiate the political parties. Poll findings also influence spending patterns.

- Transfers may be effected in cash, by cheque, or by payment for services, such as advertising, transport, T-shirts, food or some other commodity. Provisions in kind allow some of the expenses to stay within the firm or the business group or to be written off for purposes of tax if the service provided can be disguised and lumped with legitimate business expenses such as advertising or transportation.

- The state or state owned corporations and statutory bodies normally provide jobs, services (advertising, transport, food, muscle) to the governing party or designated individuals or firms as opposed to cash donations.

- "Community leaders" who control inner city spaces (garrisons) and others quasi-urban constituencies provide muscle and "ballot fodder" for candidates and parties which in turn allocate lucrative contracts to manage unemployment relief or other social programmes which have the potential to mobilise voters. The state in effect thus indirectly pays for the election campaign of the ruling party. When parties alternate, new "community leaders" may be recruited, but some groups are strategically embedded in certain inner city enclaves and have been retained as the price of social peace. In recent years, turf wars have followed changes in political administrations, and the high homicide

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4 The President of the Chamber of Commerce (Trinidad) opined that "not everybody who puts money into a party is looking for favours. It's part of the process. How else will the parties put ads in the papers and get their message across? Most contributors don't have improper motives." (Trinidad Guardian, October 7, 2002).

5 Following the 2002 Trinidad elections, the Attorney General baulked at paying a bill of US$90,000 to an advertising firm for the production of documentary material and an ad campaign entitled "Let the People Decide." The Attorney General described the actions of her UNC predecessor as an "abuse of power and a misuse of state funds." (Newsday, October 31, 2002). Both parties however use state resources to fund election activities.
rate that now obtains in the socially disadvantaged areas of the capital city, is a by-product of those rivalries.

- Substantial donations are allegedly made to political parties and candidates by narco-traffickers and money launderers in return for being allowed to carry out illegal operations without fear of serious interference from the police. It is however difficult to quantify the extent of this narco-funding.

- Some parties insist that corporate donations be made directly to the party and insist on giving receipts and deposit slips to donors. Many businesses or individuals however make donations directly to the party leader or his nominee or "bagman", (whether spontaneously or on request of the leader) and no attempt is made to formalise the transaction or insist on accountability. The aim is to avoid paper trails and also to let the patriarchal leader know personally and directly that a donation has been made to him or to the political party, and to hint however subtly that reciprocity will be expected sometime in the future. In both parties, the party treasurer only receives a fraction of the money that is given in an election campaign. This was in fact confirmed by the former Treasurer of the Trinidad United National Congress (UNC). The Political Leader of the PNM also indicated his concern about the fact that many persons solicit money in the name of the party, and that the funds are not used for the purposes for which they were given.

- Party leaders usually make fund raising trips to cities in the USA, Canada, the United Kingdom and parts of the region where there are significant diaspora groups. Some of what is collected is given to the party leader for his discretionary use. Much of it is never accounted for to the party treasurer. Expenses incurred for hotels, travel etc. are said to be high and thus reduce the net benefit available for exercise.

The phenomenon of the personal gift to the maximum leader or his designated bag man or woman is of course not new, and is recognition of the fact that he is the "boss" and de facto "owner" of the party, and that reciprocal benefits are his to bestow. What is relatively new is the appearance on the Trinidad political scene of the type of professional political investor whose donations to the party leader are ostentatious, vulgar, substantial, sustained and designed to capture a substantial slice of the fiscal resources of the state, with or without having to go through the formal processes of transparent bidding and bid evaluation. The "investor" expects to make a quick return that far exceeds what is available elsewhere in the market through the pre-arranged award of public procurement contracts to deliver goods and services, or to build huge projects on behalf of the state. The investors in turn "kick back" an agreed percentage of the value of the contract to the political leader or designated party official. Party financing is thus a formula for the investor and his cronies and the politician to loot the Treasury.

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7 According to the former treasurer, "the only money I had to work with during that campaign (2000) was TTS$4m and TTS$200,000 I raised. . . . Persons were opening private accounts with the party's money and were using it at their whim and fancy. (Trinidad Mirror, November 1, 2002). The official was unable to provide any information about TTS$7m which was said to be missing from the party's coffers. It was said to have been stolen by a very high party official who acted like a "common thief" (Newsday October 28, 2002). The Treasurer noted that money's collected abroad came under the Political Leader. "Of all the foreign money that came in, I never saw a cent except f70. Whatever the figure is, it is high," (Guardian, October 7, 2002).
The addiction of political parties and their political leaders for money to feed their personal greed and their parties needs, poses very serious problems for democracy, good governance, and fiscal integrity. It is widely believed that bribery and corruption conservatively add 20 to 25 percent to the costs of government procurement. The leakage appears to be even greater on some projects. This seems to have been the case in the construction of the new Piarco Airport in Trinidad and Tobago, a project in which costs have skyrocketed beyond belief and where the leakage was phenomenal. The same is said about the construction of water and electricity generation plants, neither of which were necessary.

Needless to say, in the final analysis, the burden for financing parties falls on taxpayers in general and on the poorer ones in particular, who are denied other basic services which could have been provided if funds were not required to repay debts accumulated for overpriced mega projects, or projects that were chosen less because of genuine need and more because of the opportunities which they provide for criminal behaviour on the part of party elites.

While widespread concern has been expressed about the consequences of the present formulae for funding party needs, few serious proposals have as yet been forthcoming for changes to be made in the formula. A signature campaign was launched in 2002 by a civil society grouping in Trinidad and Tobago which calls itself the Constitutional Reform Forum, which has as one of the five point items in its Citizens' Agenda for Constitutional Reform, a far reaching proposal for campaign finance reform. The proposal calls for:

- Mandatory public registration of all financial contributions to parties above TT$500 - 1000 within one week of receipt.
- No receipts are to be legally permitted within the two final weeks of an election campaign.
- Significant contributors of more than TT$2500-TT$5000 could be excluded from receiving any state-related contracts and/or serving in any ministerial or other position that has the power to award contracts.
- Only local citizens residing abroad should make contributions, but with the same disclosure requirements for nationally-based citizens.
- The State should provide party financing.
- To avoid abuse, such party funds should be audited independently.
- The number of votes the party amassed in the previous election should influence the size of state funds.

An attempt was also made in 2001 by the Government of Trinidad and Tobago to put the issue of campaign finance on the national agenda. On the instructions of the Attorney General, the Law Reform Commission prepared a Preliminary Report on Political Parties and the Law (2001). The Association recommended as follows:

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8 These projects are now the subject of official inquiries in Trinidad and Tobago and it is possible that following the inquiries, legal proceedings will be brought against some of those involved. Six persons are currently before the courts for offenses committed during the construction of the Airport.
(1) That a system of registration of political parties be adopted in principle;

(2) That there be consultation with national stakeholders, including the Elections and Boundaries Commission and the Trinidad and Tobago League of Concerned Citizens to determine the criteria for registration, the statutory limitations on election expenditure, and the obligations on political parties to disclose their accounts and submit their returns for public inspection;

(3) That the Canadian model be considered as a prototype for Trinidad and Tobago;

(4) That the United Kingdom Registration of Political Parties Act be considered, with respect to the prohibition on broadcasting by a party which is not registered under the Act.

The report was circulated by the Law Reform Commission to members of parliament for comment, but none was forthcoming. It may well be that MP's viewed the exercise as cosmetic and as such did not believe it merited their attention, or they were overtaken by events of a more pressing nature.

IV. PUBLIC FUNDING OF PARTIES AND ELECTION CAMPAIGNS

Proposals for public funding of campaigns, whether in pure or hybrid forms, have encountered mixed responses wherever they have been seriously debated or introduced. Those opposed to public funding are concerned with having the state, use scarce resources which should be devoted to relieving poverty and meeting other basic needs to find political parties, especially parties that are viewed as being ethically challenged. They also argue that the states in places such as the Caribbean does not have technical and administrative capacity to audit and regulate the use of such funds which could therefore be used for all kinds of questionable and even personal activities. Ruling parties could well capture and manipulate these regulatory bodies and make them their milch cows. This is particularly so in political cultures where trust, transparency and law enforcement are not the norm, and where elites treat the state and its rules with impunity, as if they were their private preserve. Would parties declare only their legitimate expenses (within the limits given) or will they pad? Would they claim, that disclosure of electoral expenses is a violation of the fundamental right of voter secrecy, or, as is the case in the US, that limiting spending levels infringes freedom of speech! Or will it be, as is in Canada, that open disclosure is seen as a guarantee of transparency in political activity or the right of citizens to be informed about how their taxes are spent?

There is also the question as to what will be the penalty for infringement or non-compliance with the rules of public financing. Will errant candidates and/or parties be decertified or required to forfeit seats in the legislature, pay fines, forfeit funding, or the right to stand in future elections? Will violators be imprisoned? Some of these penalties are currently in place in Canada and Latin America. There is also the question of who will blow the whistle on violators. Does one depend on rival parties to lodge complaints or on aggrieved whistle blowers? What if parties conspire to defraud the system by not laying complaints against one another? Then too, who will bear the costs of litigation?

There are also problems relating to the timeliness of disclosures, whether funds should be allocated in advance of elections, or whether only part should be given up front.
with the rest being paid on submission of agreed expenses after elections are concluded. If funds are given prior to elections, might it not encourage the proliferation of political entrepreneurs who regard entry into the political ring as a business venture that has few risks? If expenses are reimbursed, does it not penalise those who cannot raise political venture capital up front? Does it also not penalise those who do not have name or brand recognition and cannot raise money?

Generally speaking, those who oppose public funding believe that it would not meet its declared democratic goals, and that in general, it would increase the total funds that are spent rather than reduce them. It would also in all probability increase the funds that are not reported officially since parties still solicit funds to give them the edge they think they need, especially in close contests. The arrangement might also to fragment parties or to bureaucratise them excessively. There is also serious concern that poor societies cannot afford to subsidence parties especially those whose reputations for probity leave a lot to be desired.

We return to our fundamental question. Does money determine electoral and policy outcomes in this the age of video politics? Would either the opposition UNC or the Citizen's Alliance of Trinidad and Tobago which was formed to contest the 2002 election have won the election if more money had been spent? It is true that "if you can't pay, you can't play?" Does money flow to candidates seen as likely to win or does it cause candidates to win? More importantly, can campaign finance reform by itself change anything without reform being effected in other critical areas? "It of course depends." In Trinidad and Tobago, many constituencies are not electorally competitive, and barring a major electoral swing such as occurred in 1986 (Ryan 1989), no amount of money can change an outcome in such constituencies. Money however talks loudly in swing or competitive constituencies, especially those in which face to face canvassing is difficult for one reason or another. The experience suggests that campaign finance reform legislation in most states does little more than stimulate the ingenuity of lawyers and political practitioners who are always one step ahead of the reformers. They find the loopholes and exploit them to the maximum.

Just the same, the difficulties notwithstanding, Trinidad and Tobago has to take a serious look at its laws in respect of campaign finance. As we have seen, there are no or laws which regulate or limit the manner in which, and the extent to which political parties are funded by either the private or public sector. What we have are rules which set limits on how much a candidate can spend. That limit is TT$50,000.00 (the equivalent of US $8,000.00) per candidate, a figure which bears no relation to how much is actually spent, or how much is required to do what needs to be done, particularly in competitive constituencies where millions are reportedly spent.
Bibliography

Ryan Selwyn. 1972. Race and Nationalism in Trinidad and Tobago, University of Toronto Press.

____________. 1989 The Disillusioned Electorate In print, Port of Spain


Pinto-Duschinsky- Political Financing in the Commonwealth Commonwealth Secretariat nd.