



14 September 2018

Dear Sir/Madam

A meeting of the Governance, Audit and Standards Committee will be held on Monday, 24 September 2018 in the New Council Chamber, Town Hall, Foster Avenue, Beeston NG9 1AB, commencing at 7.00 pm.

Should you require advice on declaring an interest in any item on the agenda, please contact the Monitoring Officer at your earliest convenience.

Yours faithfully

Chief Executive

To Councillors: E H Atherton (Vice-Chair)
S A Bagshaw
T P Brindley
J C Goold
J W Handley (Chair)

J M Owen
J C Patrick
K E Rigby
R S Robinson
A W G A Stockwell

AGENDA

1. APOLOGIES FOR ABSENCE
2. DECLARATIONS OF INTEREST

Members are requested to declare the existence and nature of any disclosable pecuniary interest and/or other interest in any item on the agenda.

3. MINUTES

PAGES 1 - 4

The Committee is asked to confirm as a correct record the minutes of the meeting held on 23 July 2018.

4. ANNUAL AUDIT LETTER 2017/18

The Council's external auditors KPMG have issued an annual audit letter for 2017/18. The letter is circulated separately with the agenda.

5. INTERNAL AUDIT PROGRESS REPORT

PAGES 5 - 18

To inform the Committee of the recent work completed by Internal Audit.

6. REVIEW OF STRATEGIC RISK REGISTER

PAGES 19 - 26

To recommend approval of amendments to the Strategic Risk Register and the action plans identified to mitigate risks.

7. VOTER ID PILOTS 2019

PAGES 27 - 28

To confirm support to the Council's participation in the 2019 voter ID pilots.

8. LOCAL GOVERNMENT OMBUDSMAN AND HOUSING OMBUDSMAN SERVICE ANNUAL REVIEW LETTERS

PAGES 29 - 34

To present the Local Government Ombudsman's annual review letter and the Housing Ombudsman Service annual report to the Council and thereby promote all the Council's objectives.

9. WORK PROGRAMME

PAGES 35 - 36

To consider items for inclusion in the Work Programme for future meetings.

CIRCULATIONS

PAGES 37 - 148

These documents were circulated separately with this agenda

GOVERNANCE, AUDIT AND STANDARDS COMMITTEE

23 JULY 2018

Present: Councillor J W Handley, Chair

Councillors: J S Briggs (substitute)
T P Brindley
D Elliott (substitute)
J C Goold
S Kerry (substitute)
W J Longdon (substitute)
J M Owen
M Radulovic
K E Rigby

Apologies for absence were received from Councillors E H Atherton, R S Robinson and A W G A Stockwell.

7. DECLARATIONS OF INTEREST

There were no declarations of interest.

8. MINUTES

The minutes of the meeting held on 21 May 2018 were confirmed and signed, subject to the deletion of Councillor J Briggs as being in attendance as a substitute.

9. AUDIT OF ACCOUNTS AND ASSOCIATED MATTERS

Members were informed that the external auditors, KPMG, had examined the Council's draft Statement of Accounts 2017/18 and set out their findings in their External Audit Report 2017/18. The external auditors were present at the meeting and reported that the Council had produced a complete set of accounts by the 31 May 2018 deadline. Subject to all outstanding queries being resolved to their satisfaction, KPMG anticipated that an unqualified opinion would be issued before 31 July 2018.

In response to a question regarding the level of the Council's reserves, it was confirmed that the General Fund balance at 31 March 2018 was in excess of £6m.

The Chair thanked KPMG and officers for their work in producing and auditing the accounts in line with the deadlines.

RESOLVED that:

- 1. The Statement of Accounts 2017/18 as circulated be approved.**
- 2. The letter of representation be approved.**
- 3. The response to those matters identified within the External Audit Report 2017/18 be approved.**

10. INTERNAL AUDIT REVIEW

In accordance with the Public Sector Internal Audit Standards, developed by the Chartered Institute of Public Finance and Accountancy and the Chartered Institute of Internal Auditors, the Chief Audit and Control Officer must deliver an annual internal audit opinion and report which can be used by the Council to inform its Annual Governance Statement. The Committee considered the report which detailed the work undertaken by Internal Audit during 2017/18 and stated that it is the opinion of the Chief Audit and Control Officer that the current internal control environment is satisfactory such as to maintain the adequacy of the governance framework. In terms of the audits completed, it was found that services are operating with appropriate internal controls and, where actions have been agreed, progress is largely being made for their implementation.

A question was raised regarding the audits of stores and procurement the Interim Procurement and Contracts Officer was looking into Stores contracts which needed to be updated. The Chief Audit and Control Officer explained that an updated Procurement Strategy and contracts register were being prepared.

11. INTERNAL AUDIT PROGRESS REPORT

The Committee noted a report on the recent work completed by Internal Audit and progress against the agreed Internal Audit Plans for 2017/18 and 2018/19.

Regarding the review of the systems and procedures operating in respect of the Construction (Design and Management) Regulations 2015, officers stated that online training had been launched which would be undertaken by all officers with responsibilities for procuring and commissioning construction related work. The Intranet page had also been updated and the matter had been raised at a team briefing.

In response to a question regarding the checking of benefits claims, officers explained that this had stopped due to the member of staff who had been trained to carry out this work leaving the Council. However, the Head of Revenues and Benefits Shared Service was keen to reinstate the second checks as soon as possible.

The Interim Deputy Chief Executive explained in relation to CCTV management and control that an apprentice had been appointed to Parking Services who would undertake some of the section's more routine work. This would enable the Parking Services Manager to progress the outstanding actions from the audit.

12. COMPLAINTS REPORT 2017/18

The Committee noted a report detailing the complaints which had been made against the Council in 2017/18. Further information was requested on the complaints about unacceptable standards of service and whether social media had had an influence on the number of complaints received over the last 10 years. This would be circulated to members of the Committee.

13. REVIEW OF POLLING DISTRICT AND POLLING PLACES

The Committee considered a report on the arrangements for the review of polling districts and polling places to be carried out later in the year. Suggestions as to alternative venues which could be used as polling stations instead of the temporary units would be welcome.

The working group which had considered these issues previously would not be reconvened. Members would however be able to raise concerns about proposed changes and these would be reported back to the Committee in December for consideration before a recommendation is made to full Council.

14. WORK PROGRAMME

The Committee considered the Work Programme for future meetings.

RESOLVED that the Work Programme be approved.

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Report of the Chief Audit and Control Officer

INTERNAL AUDIT PROGRESS REPORT1. Purpose of report

To inform the Committee of the recent work completed by Internal Audit.

2. Detail

Under the Council's Constitution and as part of the overall corporate governance arrangements, this Committee is responsible for monitoring the performance of Internal Audit.

A summary of the reports issued and progress against the agreed Internal Audit Plan for 2018/19 is included at appendix 1. A brief narrative of the work completed by Internal Audit since the previous meeting of this Committee is also included.

Internal Audit has undertaken a review of progress made by management in implementing agreed actions within six months of the completion of the respective audits. Details of this follow-up work is included at appendix 2. Where agreed actions to address significant internal control weaknesses have not been implemented this may have implications for the Council. A key role of the Committee is to review the outcome of audit work and oversee the prompt implementation of agreed actions to help ensure that risks are adequately managed.

Further progress reports will be submitted to each future meeting of this Committee. A final report will be prepared for Members' consideration after the end of the financial year detailing the overall performance and productivity of Internal Audit for 2018/19.

Recommendation

The Committee is asked to NOTE the report.

Background Papers

Nil

APPENDIX 1

INTERNAL AUDIT REPORTS ISSUED SINCE APRIL 2018

No	Audit Title	SIA	Report Issued	Opinion	Actions		IA Plan 2018/19 Complete
					Significant	Merits Attention	
29	Gas Safety Servicing and Maintenance	CF	20/04/18	Substantial	0	1	-
01	Erewash BC – Risk Management	CF	24/04/18	-	-	-	-
02	Erewash BC – Crematorium	CF	04/05/18	-	-	-	-
30	Financial Resilience	CF	14/05/18	Substantial	0	0	-
31	CDM Regulations	CF	18/05/18	Reasonable	1	0	-
32	Human Resources	CF	22/05/18	Substantial	1	1	-
03	Procurement	CF	07/06/18	LIMITED	1	1	3%
33	Benefits	WL	12/06/18	Reasonable	1	0	-
34	Risk Management	CF	25/06/18	Substantial	0	3	-
04	Cemeteries	CF	25/06/18	Substantial	0	1	5%
4a	Erewash BC – Cemeteries	CF	25/06/18	n/a	-	-	-
35	Parks and Grounds Maintenance	WL	28/06/18	Substantial	0	1	-
36	Choice Based Lettings	CF	30/06/18	Substantial	0	1	-
05	LAHS Return	WL	31/08/18	n/a	-	-	-
37	Serious and Organised Crime	WL	05/09/18	Reasonable	0	6	-
06	Right to Buy	CF	06/09/18	Substantial	0	3	8%
07	Asset Register	CF	06/09/18	Substantial	0	0	11%
08	Legionella Prevention and Testing	WL	11/09/18	Reasonable	0	5	14%
09	Sundry Debtors	WL	14/09/18	Reasonable	1	0	16%
10	Creditors and Purchasing	CF	14/09/18	Reasonable	0	2	19%

REMAINING INTERNAL AUDIT PLAN 2018/19

No	Audit Title	SIA/ Days	Progress	IA Plan Complete
	Payroll (including Officers Allowances)	WL	Draft report issued	22%
	Cash Receipting	WL	Draft report issued	24%
	Transport (Fleet Management)	CF	Draft report issued	27%
	Commercial Properties (All)	CF	Draft report issued	30%
	Garden Waste Collection	CF	Ongoing (Nearing completion)	32%
	Electrical Testing	CF	Ongoing	35%
	Computer/ICT	WL	Ongoing	38%
	Section 106 Agreements	WL	Commenced	41%
	Bramcote Leisure Centre	CF	Commenced	43%
	Events (including Play Leadership)	CF	Commenced	46%
	Licensing (including Taxi Licences)	WL	Commenced	49%
	Safeguarding	8	Expected to commence in Q2	51%
	Commercialisation/Business Strategy	8	Expected to commence in Q3	54%
	Information Governance	8	Expected to commence in Q3	57%
	Corporate Governance (incl. Ethics)	8	Expected to commence in Q3	59%
	Tenancy Management (incl. ASB)	10	Expected to commence in Q3	62%

REMAINING INTERNAL AUDIT PLAN 2018/19 (CONTINUED)

No	Audit Title	SIA/ Days	Progress	IA Plan Complete
	Beeston Town Centre Redevelopment	6	Expected to commence in Q3	65%
	Lifeline (Aids and Adaptations)	5	Expected to commence in Q3	68%
	Treasury Management	6	Expected to commence in Q3	70%
	Energy (including Procurement)	8	Expected to commence in Q3	73%
	Homelessness	10	Expected to commence in Q3/4	76%
	Risk Management (Risk Assessment)	8	Expected to commence in Q3/4	78%
	NNDR	10	Expected to commence in Q3/4	81%
	Rents (including Evictions)	12	Expected to commence in Q3/4	84%
	Choice Based Lettings	12	Expected to commence in Q4	86%
	Bank Reconciliation	3	Expected to commence in Q4	89%
	Key Reconciliations	2	Expected to commence in Q4	92%
	Benefits	20	Expected to commence in Q4	95%
	Council Tax	12	Expected to commence in Q4	97%
	Human Resources	8	Expected to commence in Q4	100%

COMPLETED AUDITS

A report is prepared for each audit assignment and issued to the relevant senior managers at the conclusion of a review that will:

- include an overall opinion on the adequacy of controls within the system to provide assurance that risks material to the achievement of objectives are adequately managed – the opinion being ranked as either ‘Substantial’, ‘Reasonable’, ‘Limited’ or ‘Little’ assurance;
- identify inadequately addressed risks and non-effective control processes;
- detail the actions agreed with management and the timescales for completing those actions, and;
- identify issues of good practice.

The recommendations made by Internal Audit are risk assessed, with the agreed actions being categorised accordingly as follows:

- Fundamental – urgent action considered imperative to ensure that the Council is not exposed to high risks (breaches of legislation, policies or procedures)
- Significant – action considered necessary to avoid exposure to significant risk.
- Merits Attention (Necessary Control) – action considered necessary and should result in enhanced control or better value for money.
- Merits Attention – action considered desirable to achieve enhanced control or better value for money.

The following audit reports have been issued with key findings as follows:

1. Local Authority Housing Statistics Return

Internal Audit has reviewed the Local Authorities Housing Statistics return to independently examine and confirm that the statistics had been appropriately and accurately compiled and verified prior to submission to the Ministry of Housing, Communities and Local Government (MHCLG).

Overall, the review concluded that the methods used to produce the data were appropriate and that the figures presented provided a true and fair view of the Council's position. Internal Audit made two recommendations which, if implemented, should improve the efficiency and accuracy of data collected.

2. Serious and Organised Crime Assurance Opinion – **Reasonable**

Internal Audit has reviewed the procedures operating to mitigate the risk of serious and organised crime being perpetrated against the Council.

The Local Government Association (LGA) produced a document entitled 'Tackling Serious and Organised Crime – A Local Response' and established a number of local pilot studies to examine the effects of serious and organised crime on local authorities. Following these studies, a guide was produced for local authorities to use to audit their processes for the prevention and detection of serious and organised crime.

Using the LGA guidelines, Internal Audit has evaluated the approaches taken to mitigate the risk of serious and organised crime being perpetrated against the Council. The report identified a number of actions that, if addressed, should help with the following:

- Raising awareness of the ways that criminals can target local authorities and the methods used; helping officers to identify vulnerabilities in processes that could be exploited by criminals and assist in identifying suspicious activity that will improve prevention and detection.
- Providing clear pathways for reporting concerns and guidance for the collection and preservation of evidence that could be of use in an investigation or criminal prosecution.

Internal Audit proposed six 'Merits Attention' recommendations (including five 'Necessary Control' actions) namely to:

- Produce a Serious and Organised Crime Policy which identifies key risk areas and sets out the process for the investigation, evidence gathering and preservation, intelligence sharing and reporting of such cases.
- Provide further targeted awareness training for managers and front-line staff in service areas that are at the highest risk and for updates/warnings to be provided via email and/or the Intranet by the Community Safety team.

- Complete a risk and impact assessment of serious and organised crime to determine whether the risk should be included on operational risk registers and/or the Strategic Risk Register.
- Consider the risk of serious and organised crime as part of the ongoing reviews of the procurement and commissioning strategy and procedures.
- Update the Whistleblowing Policy to include the Chief Audit and Control Officer as an independent person who can receive complaints under the Policy.
- Review recruitment processes to ensure that the appropriate checks are made for all appointments in relation to references and clearances.

The review findings were supported and an action plan duly agreed with the Chief Executive and the Head of Public Protection.

3. Right to Buy Assurance Opinion – **Substantial**

This review sought to confirm whether adequate management control exists to provide assurance that Right to Buy applications/transactions are processed in an accurate and timely manner and that robust arrangements are in place for the prevention of fraud.

Internal Audit reports that the Council has an appropriate framework in place for the administration of Right to Buy applications. The review did indicate areas for improvement and three Merits Attention 'Necessary Control' actions were proposed relating to the documentation and review of the discount calculations; improvements to fraud prevention measures and updating privacy notices.

The actions were duly agreed and implemented by the Interim Senior Housing Manager and her team.

4. Asset Register Assurance Opinion – **Substantial**

Internal Audit sought to confirm that the assets held by the Council, including Housing Stock, are recorded and presented correctly in the Annual Statement of Accounts; and that adequate records of assets are maintained.

It was reported that the Council continues to maintain an appropriate framework for the administration of operations in respect of the Asset Register. An earlier issue relating to the registration of Cavendish Lodge had been resolved, with HM Land Registry accepting the Council's application as the proprietor and duly completing its registration.

Internal Audit also noted a recommendation from the external auditors, KMPG, regarding the engagement of an external valuer to assist with the preparation of the annual Statement of Accounts which will be adopted by management in order to ensure full compliance with the Royal Institution of Chartered Surveyors (RICS) Professional Standards.

No significant areas of concern were noted during the course of the audit. The findings arising from this review did not indicate any significant areas for improvement and, accordingly, Internal Audit issued a clearance report.

5. Legionella Prevention and Testing Assurance Opinion – **Reasonable**

Internal Audit has reviewed the systems and processes operating in respect of Legionella management. The audit sought to confirm whether adequate management control exists to provide assurance that:

- Proper policies are in place in relation to Legionella management to ensure compliance with legislative requirements.
- All relevant properties are identified and included in a suitable testing regime.
- Appropriate contractual and tendering arrangements are in place for contractors hired to carry out testing and their respective qualifications, safety procedures and insurance cover are reviewed.
- Arrangements in relation to properties managed by Liberty Leisure are defined and the responsibilities for testing clearly determined.
- Appropriate records of testing are maintained.
- Reporting and escalation processes in the event of detection of Legionella have been clearly determined.

Internal Audit is of the opinion that the Council has taken appropriate steps towards preventing outbreaks of Legionella and that officers are applying appropriate testing regimes locally. There were weaknesses noted in relation to policy and management that need to be addressed to ensure that the Council fully complies with the legislation, provides improved internal control and is consistently applying best practice in all cases. Five 'Merits Attention - Necessary Control' actions were proposed relating to:

- Updating the Legionella Policy, maintained by Health and Safety, and ensuring that the nominated 'Responsible Persons' are aware of policy requirements and how it affects them in terms of their responsibilities.
- Carrying out annual Health and Safety audits of Legionella prevention and detection processes and to report the findings to General Management Team and the Safety Committee.
- Defining responsibilities for arranging training courses and managing appropriate training records to ensure compliance.
- Reviewing the corporate approach for commissioning Legionella testing, risk assessment, cleaning, chlorination and training services, with a view to ensuring compliance with procurement regulations and obtaining value-for-money.

- Producing a Legionella Policy for Liberty Leisure which defines the responsible persons, risk assessment and testing procedures, reporting lines and escalation protocols.

The proposed actions were agreed by the Head of Property Services; Interim Senior Housing Manager; Health and Safety Manager; and the Managing Director – Liberty Leisure. Internal Audit will complete appropriate follow-up work at six months from the date of the audit report and will report back to Committee accordingly.

6. Sundry Debtors Assurance Opinion – **Reasonable**

The Council has an appropriate framework in place for the administration of operations in respect of Sundry Debtors. It was pleasing to note that steps had been taken that should ensure that uncollectable debts are recognised and written off more efficiently than previously; and that attempts are being made to improve collection rates and reduce costs by using the Council's collection agents to pursue all debts before court action is contemplated.

There was one 'Significant' action relating to the need to complete a regular, prompt and adequate reconciliation between the Sundry Debtors system and the Civica Legal module, as follows:

Objective

Internal Audit sought to ensure that invoiced amounts are efficiently collected and accounted for correctly.

Findings – Reconciliations

Internal Audit has previously expressed concerns regarding the failure to complete an adequate formal reconciliation between the Civica Legal module and the Sundry Debtors system.

The failure to reconcile the number of cases and the value of individual debt on the two systems could result in a case not being identified where recovery action has been suppressed. It could also lead to a failure to identify cases where costs and receipts have not been allocated to the correct accounts.

Internal Audit is still not satisfied that the number of cases and the total value of outstanding debt on both systems align. The continuing failure to complete a formal reconciliation means that the affected cases have not been identified and corrected.

There are clearly issues with individual accounts, some of which date back to the implementation of the Civica Legal module. The current difference in the total outstanding debt figure between the systems is around £1,500. This variation is likely to include individual cases where:

- Legal costs included within Civica Legal are not being fully recognised in individual accounts in Sundry Debtors
- The value of individual write-offs in Sundry Debtors not being fully replicated in Civica Legal (likely due to the costs allocation issues)
- There were potentially errors in the original transfer of data from the former legal ARMS system.

It is noted that work has restarted in earnest to resolve these matters. Going forward, there should be a reduction in caseload appearing on Civica Legal as a result of the decision to now refer all cases to collection agents as part of recovery action. More cases may now be written-off at this stage, without referral to Legal Services for court action to be considered. A major case review is ongoing and write-offs are now being proposed for approval on a quarterly basis. Any differences should be highlighted and actioned as part of this review work and the ability to reconcile the two systems thereafter should be an easier process.

Agreed Actions (Significant)

A full review of outstanding debt on the Civica Legal module is currently being undertaken by the Business Support Team Leader with co-operation from the recovery team. Progress is being made with any remaining differences between the Civica Legal module and the Sundry Debtors system should be identified, investigated and corrected.

Thereafter, a regular monthly reconciliation should be promptly completed by the Business Support Team with the statements being reviewed and approved by an appropriate senior officer in Legal Services.

Managers Responsible

Chief Solicitor and Deputy Monitoring Officer
Sundry Debtors Performance Group

Target Date: 31 March 2019

The actions were agreed by the Chief Solicitor and Deputy Monitoring Officer and the Sundry Debt Performance Monitoring Group.

7. Creditors and Purchasing Assurance Opinion – **Reasonable**

The Council has an established framework in place for the administration of operations in respect of creditors and purchasing. The audit did indicate areas for improvement and further recommendations were proposed in order to ensure that the processes and controls in place are effective. Two 'Merits Attention – Necessary Control' actions were proposed in respect of:

- The need to ensure that the appropriate officers are approving orders and authorising invoices for payment; and
- The requirement to ensure that orders are issued as appropriate and in a timely manner in accordance with Financial Regulations.

These proposed actions also link in with the external auditors recommendations regarding 'three-way match' control to ensure that expenditure is tightly controlled in line with best practice approval principles.

The Council is currently progressing with new project to introduce intelligent scanning that will refine the processes relating to purchase ordering and invoice payment systems. This should help to resolve the issues relating to the matching of purchase orders and the prompt and consistent scanning of invoices.

The actions were duly agreed by the Head of Finance Services and the Chief Accountant.

Further reviews in respect of Cash Receipting, Commercial Properties, Computer, Garden Waste Collection, Electrical Testing, Payroll (including Officers Allowances) and Transport (Fleet Management) are ongoing and the reports have yet to be finalised. These will be included in the next progress report to Committee.

Current Audit Performance

Overall 32% of planned audits for 2018/19 are near to completion. This level of performance is similar to what was achieved at this stage in the previous year and the target of 90% is expected to be achieved.

APPENDIX 2

INTERNAL AUDIT FOLLOW-UP

Internal Audit has undertaken a review of progress made by management in implementing agreed actions within six months of the completion of the audit.

The table below provides a summary of the progress made with agreed actions for internal audit reports issued between September 2015 and February 2018 (i.e. within six months of completion), excluding clearance reports. Those audits where all actions have previously been reported as completed have also been excluded from this list.

No	Audit Title	Report Issued	Opinion	Number of Actions (Significant in brackets)	Progress
10	CCTV 2015/16	09/09/15	LIMITED	3 (2)	See below
36	Household Refuse/Bulky Waste 2015/16	06/06/16	Reasonable	5 (1)	Completed
12	Members Allowances 2016/17	06/10/16	Substantial	3	1 Outstanding
33	Information Management 2016/17	12/05/17	Reasonable	4	Completed
06	Creditors and Purchasing 2017/18	15/09/17	Reasonable	3 (1)	Next Audit
18	Housing Repairs 2017/18	22/01/18	Reasonable	3 (1)	2 Outstanding
20	HiMO Licences 2017/18	23/01/18	Substantial	4	1 Outstanding
21	Stores 2017/18	31/01/18	LIMITED	3 (2)	1 Outstanding
24	Council Tax 2017/18	20/02/18	Substantial	1	Completed

Further details of progress being made with agreed actions that have not yet been fully implemented are included below along with comments from management reflecting any updates on progress. Evidence of implementation will not be routinely sought for all actions as part of this monitoring process. Instead, a risk-based approach will be applied to conducting further follow-up work.

Where the agreed actions to address significant internal control weaknesses have not been implemented this may have implications for the Council. A key role of the Committee is to review the outcome of audit work and oversee the prompt implementation of agreed actions to help ensure that risks are adequately managed.

OUTSTANDING ACTIONS

1. CCTV September 2015, Limited Assurance, Agreed Actions – 3 (with 2 Significant)	
1.1 CCTV Management and Control	Progressing
1.2 CCTV Policy	Progressing
<p><u>Agreed Actions (Significant)</u></p> <p>There is consideration of establishing a central management and control function in respect of CCTV at Broxtowe, with the proposal to create this expertise under the revised remit of the Parking Manager.</p> <p>A comprehensive policy/guidance document covering the operation of CCTV systems across the Council will be created having due regard to the relevant legislation, regulations and codes of practice.</p> <p>To support this process, the Parking Manager will initially complete a schedule of visits to all satellite sites with CCTV systems to offer guidance and support. These visits will include a summary review of the respective systems in place and, where appropriate, immediate restrictions will be applied if found to be necessary.</p> <p>Whilst the Parking Manager will be the direct contact for advice and support, a responsible officer will be identified for individual systems at each site.</p> <p><u>Managers Responsible</u> Head of Property Services Parking Manager</p>	<p><u>Management Progress Report of the Head of Property Services</u></p> <p>Centralised management has taken place for 90% of the Council’s camera surveillance stock. All sites have been visited with the purpose and need for each system being reviewed. Recommendations have been made regarding the appropriateness, centralisation and continued monitoring responsibilities of each system. All officers associated with surveillance systems have received guidance on appropriate use in line with the Government’s Camera Surveillance Commissioner’s principles.</p> <p>The Council is working in accordance with Government guidance, but policies need updating to reflect changes in circumstances.</p> <p>The Parking Manager has made progress with centralisation and has advised Liberty Leisure on its operations. Centralising all systems is difficult and will require further dedicated resources to fully complete this process. A lack of officer resources does not allow an alternative site visit-based monitoring and enforcement option. Some savings have been achieved by reducing monitoring costs for the shared service. Negotiations in relation to shared control room and CCTV maintenance management is taking place. This will hopefully secure funding for additional resource to support CCTV, Security and Parking Services.</p> <p>The process of developing updated and more accurate comprehensive policies to reflect surveillance activities has been delayed.</p> <p>Internal Audit recommends that this action has been completed as far as practically possible and the risks should be reconsidered as part of a proposed audit of CCTV in 2019/20.</p>

2. MEMBERS ALLOWANCES		October 2016, Substantial Assurance, Agreed Actions – 3
2.1 Motor Insurance – Business Use		Progressing
<p><u>Agreed Action</u> (Merits Attention)</p> <p>Members will be asked to provide annual confirmation to the Council that their motor insurance policy provides cover for 'business use' wherever appropriate. This will be provided via Democratic Services.</p> <p><u>Managers Responsible</u> Head of Administrative Services/Chief Audit and Control Officer</p>	<p><u>Management Progress Report of the Head of Administrative Services</u></p> <p>This matter is being considered as part of a wider review of the Driving at Work Policy. Any requests for information will be supported by Democratic Services.</p>	
3. HOUSING REPAIRS		January 2018, Reasonable Assurance, Agreed Actions – 3 (including 1 'Significant')
3.1 Performance Management Framework		Progressing
<p><u>Agreed Action</u> (Merits Attention – Necessary Control)</p> <p>The new Performance Management Framework produced for Housing Repairs is being considered for wider adoption by the Housing department to support the link into its business planning processes.</p> <p>Whilst some points have already been adopted by Housing Repairs, it is anticipated that the new framework will be finalised, approved and scheduled for implementation by the target date.</p> <p><u>Managers Responsible</u> Interim Senior Housing Manager Housing Repairs Manager</p> <p style="text-align: right;">Target Date: 30 April 2018</p>	<p><u>Management Progress Report of the Interim Senior Housing Manager</u></p> <p>There have been some delays in fully implementing all aspects of the performance management framework, following the departure of the Housing Repairs Manager. It is expected that full implementation will be achieved across the department by the end of Quarter 3.</p> <p>The implementation of an upgraded Open Housing system will greatly assist performance monitoring across the repairs service. Phase 1 of the project, which includes Repairs Total Mobile, is due for completion in December 2018.</p>	

3. HOUSING REPAIRS (Continued)	
3.2 Overdue Contract Tenders	Progressing
<p><u>Agreed Action (Significant)</u> All expired and soon-to-be expiring contracted works will be reviewed and subject to the appropriate tender at the earliest opportunity.</p> <p>Significant progress has been made in priority areas in terms of contract/ design specification, schedule of rates and consultations on the suitability of tending through established frameworks. The support of the new Procurement and Contracts Officer will be important for the priority and high-complexity tenders. A suitable timetable for completing the review and renewal of these contracts will be agreed with the Procurement team.</p> <p><u>Managers Responsible</u> Interim Senior Housing Manager/Housing Repairs Manager Procurement and Contracts Officer Target Date: 30 June 2018</p>	<p><u>Management Progress Report of the Interim Senior Housing Manager</u> Progress has been made and a corporate timetable for contract procurement is being developed in partnership with the Interim Procurement and Contracts Officer. The Cleaning and Voids Works contract has been procured and the new contract is effective from September 2018.</p>
4. HOUSES IN MULTIPLE OCCUPANCY LICENCES January 2018, Substantial Assurance, Agreed Actions – 4	
4.1 Licence Fees - Charging Regime	Progressing
<p><u>Agreed Action (Merits Attention)</u> The current cost of providing the service will be ascertained and the appropriate licence fee determined. This review will be linked to the changes to legislation that are anticipated during 2018.</p> <p><u>Managers Responsible</u> Head of Public Protection Senior Private Sector Housing Officer Target Date: 31 December 2018</p>	<p><u>Management Progress Report of the Head of Public Protection</u> Benchmarking of fees charged has been undertaken against other local authorities.</p> <p>A report has been prepared for the Housing Committee that will consider new legislation relating to Houses in Multiple Occupancy. This will require more properties to be licensed. A new appointment will support the additional work that will be required. This will include completing the review of costs and licence fees in 2018/19.</p>

5. STORES		January 2018, Limited Assurance, Agreed Actions – 3 (including 2 ‘Significant’)
5.1 Procurement of Stores Items		Progressing
<p><u>Agreed Action (Significant)</u></p> <p>Management will review all procurement and purchasing activity relating to Stores with a view to establishing a programme of retendering work to ensure that requirements are met in full.</p> <p>There will be consideration of using established procurement frameworks for these contracts. The support of the new Procurement and Contracts Officer will be important for the priority and high-complexity tenders. A suitable timetable for completing the review and renewal of these contracts will be agreed with the Procurement team.</p> <p><u>Managers Responsible</u> Head of Environment Transport and Stores Manager</p>	<p><u>Management Progress Report of the Transport and Stores Manager</u></p> <p>Work is ongoing to review all procurement activity relating to the Stores. Contract opportunities are being retendered as appropriate to ensure compliance with the Public Contract Regulations (PCR) and the Council’s Standing Orders. The Interim Procurement and Contracts Officer is supporting this process and has supplied details of relevant framework agreements to support this activity.</p>	<p>Target Date: 30 June 2018</p>

Report of the Interim Deputy Chief Executive

REVIEW OF STRATEGIC RISK REGISTER1. Purpose of report

To recommend approval of amendments to the Strategic Risk Register and the action plans identified to mitigate risks.

2. Detail

Further to earlier reports to this Committee and in accordance with the timescales set out in the Risk Management Strategy, the Strategic Risk Management Group met on 8 August 2018 to review the Strategic Risk Register. The General Management Team (GMT) has since considered the proposals from the Strategic Risk Management Group. The objectives of the review were to:

- Identify the extent to which risks included in the Strategic Risk Register are still relevant
- Identify any new risks to be included in the Strategic Risk Register
- Review action plans to mitigate risks.

Details of proposed amendments to the Strategic Risk Register and action plans resulting from the above process are attached in the appendix. A risk map is also included in the appendix to assist the understanding of scores allocated to risks within the Strategic Risk Register.

A revised copy of the Strategic Risk Register incorporating the proposed amendments is available on the intranet. Details of further reviews of the Strategic Risk Register will be reported to future meetings of this Committee.

Recommendation

The Committee is asked to RESOLVE that the amendments to the Strategic Risk Register and the action plans to mitigate risks as set out in the appendix be approved.

Background papers

Nil

APPENDIX

Risk Map

High	<p><u>Important risks</u> - which may potentially affect the provision of key services or duties</p> <p style="text-align: right;">6</p>	<p><u>Key risks</u> - which may potentially affect the provision of key services or duties</p> <p style="text-align: right;">7</p>	<p><u>Immediate action</u> - to prevent serious threat to provision and/or achievement of key services or duties</p> <p style="text-align: right;">9</p>
Impact	<p><u>Monitor as necessary</u> - less important but still could have a serious effect on the provision of key services or duties</p> <p style="text-align: right;">3</p>	<p><u>Monitor as necessary</u> - less important but still could have a serious effect on the provision of key services or duties</p> <p style="text-align: right;">5</p>	<p><u>Key risks</u> - which may potentially affect the provision of key services or duties</p> <p style="text-align: right;">8</p>
Low	<p><u>No action necessary</u></p> <p style="text-align: right;">1</p>	<p><u>Monitor as necessary</u> - ensure being properly managed</p> <p style="text-align: right;">2</p>	<p><u>Monitor as necessary</u> - less important but still could have a serious effect on the provision of key services or duties</p> <p style="text-align: right;">4</p>
	Low	Likelihood	High

Summary of proposed amendments to strategic risks and action plans

Inherent Risk – Gross risk **before** controls and mitigation

Residual Risk – Risk remaining **after** application of controls and mitigating measures

STRATEGIC RISK REGISTER

List of risks in order of significance

Risk	Inherent Risk	Residual Risk	Changes
1. Failure to maintain effective corporate performance management and implement change management processes	9	5	An action is added to present an annual review of the Corporate Plan to the Policy and Performance Committee.
2. Failure to obtain adequate resources to achieve service objectives	9	9	<p>New actions have been added to:</p> <ul style="list-style-type: none"> • Address the areas identified in the Local Government Association review of the Council's finances. • Assess the potential outcome of the Fair Funding Review and the Spending Review 2019 upon the Council's finances. • Evaluate proposals submitted for the future of the Town Hall. • Progress the disposal of the Cavendish Lodge site. • Support the application by Nottinghamshire local authorities to become a business rates retention pilot area from 2019/20. <p>The actions to assess the impact upon the Council of the introduction of the National Living Wage and to adopt a new Economic Regeneration Strategy can be deleted.</p>
3. Failure to deliver the Housing Revenue Account (HRA) Business Plan	9	7	<p>The Garage Management Policy, Right to Buy Policy and Allocations Policy are added as key controls. An action to assess any potential implications from the Social Housing Green Paper has been added.</p> <p>The following actions are completed:</p> <ul style="list-style-type: none"> • Implement the restructure of the Housing Department agreed by Policy & Performance Committee. • Commission an independent review of the Retirement Living Service. • Draft a new Allocations Policy and complete appropriate consultation. • Seek approval for a new Repairs Policy.

Risk	Inherent Risk	Residual Risk	Changes
4. Failure of strategic leisure initiatives	9	9	An action to undertake a detailed property condition survey at Bramcote Leisure Centre has been added. The action to appoint a new Managing Director for Liberty Leisure has been completed.
5. Failure to complete the re-development of Beeston town centre	9	9	No change.
6. Not complying with domestic or European legislation	9	7	The action to assess and address any requirements resulting from the implementation of the General Data Protection Regulations is complete.
7. Failure of financial management and/or budgetary control and to implement agreed budget decisions	9	7	An action to prepare annual accounts in accordance with corporate and legislative timescales including the requirement under the Accounts and Audit Regulations 2015 to complete and publish the final accounts by 31 May and 31 July respectively for the 2017/18 financial year was achieved. This action has now been updated to prepare annual accounts in accordance with corporate and legislative timescales.
8. Failure to maximise collection of income due to the Council	9	7	The action to monitor the impact of the social housing size criteria on council house rent income is deleted.
9. Failure of key ICT systems	9	6	No change.
10. Failure to implement Private Sector Housing Strategy in accordance with Government and Council expectations	9	5	The number of unlicensed Houses in Multiple Occupation (HMOs) requiring mandatory licences has been added as a risk indicator. The results of private sector stock condition surveys and the number of vulnerable people living in non-decent private sector homes can be deleted as risk indicators. An action point to ensure a revised mandatory licensing regime for HMO is properly implemented is added. The action points to seek funding for, and implement, energy saving initiatives and to reduce the number of people living in non-decent private sector homes can be deleted.
11. Failure to engage with partners/community to implement the Broxtowe Sustainable Community Strategy 2010 – 2020	9	5	The Local Enterprise Partnership (LEP) has been deleted as a key control.
12. Failure to implement effective Crime and Disorder	9	5	An action point has been updated to maximise usage of Police and Crime

Risk	Inherent Risk	Residual Risk	Changes
Reduction Strategy			Commissioner funding. The action point to develop and deliver a neighbourhood action plan for Eastwood South is amended to include Stapleford. The actions to develop and deliver a domestic violence and abuse action plan and to implement the ECINS case management and data sharing system for all anti-social behaviour cases referred to Council departments have been deleted.
13. Failure to provide housing in accordance with the Local Development Framework	9	9	The action to establish a Housing Delivery Company has been deleted.
14. Natural disaster or deliberate act, which affects major part of the Authority	9	7	No change.
15. Failure to mitigate the impact of the Government's welfare reform agenda	9	7	Two actions added to utilise the services of Citizens Advice Broxtowe in providing personal budget support for Universal Credit claimants and to host a series of stakeholder workshops before the full rollout of Universal Credit.
16. Failure to maximise opportunities and to recognise the risks in shared services arrangements	9	7	No change.
17. Corporate and/or political leadership adversely impacting upon service delivery	9	7	An action to implement a committee management system is added
18. High levels of sickness	8	7	No change
19. Lack of skills and/or capacity to meet increasing initiatives and expectations.	8	5	No change.
20. Inability to attract or retain key individuals or groups of staff	8	5	No change.
21. Failure to fully utilise investment in ICT infrastructure	7	5	No change.
22. Processes or procedures not followed leading to ill informed decisions and/or abuse of Council facilities	7	5	The Alcohol and Drugs Misuse Policy is added as a key control. The action to assess and address any requirements resulting following the implementation of the General Data Protection Regulations is complete.
23. Failure to comply with duty as a service provider and employer to groups such as children, the elderly,	7	5	The following actions have been added/updated: <ul style="list-style-type: none"> Set up a task and finish group to capture the Council's approach to

Risk	Inherent Risk	Residual Risk	Changes
vulnerable adults etc.			<p>those with mental health issues.</p> <ul style="list-style-type: none"> • Implement the agreed changes following the review of the Retirement Living Service. • Provide a guidance document for staff when dealing with people who threaten suicide. • Implement a care leavers' council tax reduction scheme. <p>The following completed actions can be removed:</p> <ul style="list-style-type: none"> • Audit the provision of training on the recognising and reporting of child abuse and adults at risk. • Produce a Child Poverty Action Plan 2016-19.
24. Failure to ensure appropriate levels of data quality	7	5	No change.
25. Unauthorised access of data	7	5	No change.
26. High volumes of employee or client fraud	6	5	No change.
27. Failure to effectively communicate either externally or internally	5	5	A new action is added to rollout the use of the Broxtowe Communications Toolkit.

Further Details

The following items are highlighted for the attention of Members.

1. Risk Management Policy Statement and Risk Management Strategy

During reviews of the Strategic Risk Register, the continuing validity of the current nine score matrix (3x3) for the Risk Map has been questioned. In some cases the inherent risk score remains at the same level as the residual risk score despite the raft of control measures and mitigating actions that have been put in place. This could, in theory, bring into question the cost and benefits of applying the various controls and mitigating actions.

As the Risk Management Policy Statement and Risk Management Strategy were last updated in June 2016, now would be an appropriate time to review these documents to include consideration of the Risk Map. A number of alternatives are available including the application of a 20 score matrix (5x4) or a 25 score matrix (5x5) for the Risk Map to allow for risks to be more accurately scored. The support and advice of the Council's insurers, Zurich Municipal, is being sought to assist utilising the Risk Management Fund that they maintain for initiatives at the Council. This work will include refreshing the Risk Management Policy Statement and Strategy, providing risk management training to managers and validating or testing business continuity plans.

It is intended that a revised Risk Management Policy Statement and Risk Management Strategy be presented to a forthcoming meeting of the Strategic Risk Management Group. Any feedback received will be incorporated before the documents are presented to the Governance, Audit and Standards Committee for approval.

2. Risk of Failure of Liberty Leisure

The Strategic Risk Management Group agreed that the risk of failure of the Liberty Leisure Trading Company should be regarded as a separate strategic risk in addition to 'Failure of Strategic Leisure Initiatives' (Risk 4). A risk owner, inherent and residual risk scores, key controls, risk indicators and action points have been assigned to the new risk which will be fully considered at the next meeting of the Strategic Risk Management Group.

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Report of the Interim Strategic Director

VOTER ID PILOTS 20191. Purpose of report

To confirm support to the Council's participation in the 2019 voter ID pilots.

2. Background

Voter ID is an integral part of the government's agenda to deliver a clear and secure democracy. Pilots were carried out in 5 local authorities at the local elections in May 2018 requiring voters to produce ID before they could be issued with a ballot paper. Three types of ID were piloted:

- photographic
- non-photographic e.g.: Council Tax bill, utility bill
- poll cards

Despite negative publicity in the media about the pilots, the Returning Officers who took part have indicated that the pilots were a successful test of the implementation of voter ID with the experience being overwhelmingly positive. In Swindon voter turnout increased by 6% from the previous local elections. Gosport also saw an increased turnout. Of the 234,000 electors across the five authorities taking part, 340 electors failed to return with the correct ID. The majority of those who turned up to vote without ID later returned with ID without issue. Of the 62,191 who visited a polling station in Swindon, only 25 chose not to return with the relevant ID, ie: 0.04%; in Gosport only 44 voters did not take the necessary ID with them. A copy of the evaluation reports produced by the Electoral Commission and Cabinet Office are circulated separately with the agenda.

Cabinet Office has announced that further pilots will be held in 2019 which will enable the models trialled this year to be refined, implemented with different partners and provide additional evidence for national roll out. Further testing will also help in understanding how to deliver a policy which best suits voters, local authorities and the Cabinet Office's commitment to introduce measures to improve the integrity of democracy in the United Kingdom. The Electoral Commission in its report evaluation agreed that it would be useful to collect more evidence from further pilots in 2019, with a wider range of councils running pilot schemes.

Further details of the pilot schemes and the rationale in support of an application to become a pilot are set out in the appendix.

3. Financial implications

Funding for the net additional costs of participating in a 2019 voter ID pilot will be provided by the Cabinet Office.

Recommendation

The Committee is asked to RESOLVE that the application to take part in the 2019 voter ID pilots be approved.

Background papers: Nil

Advantages of taking part in the pilots

- The pilots are a good opportunity to introduce voters to the idea of having to produce ID before it becomes compulsory from the next parliamentary election in 2022.
- It would give Electoral Services an opportunity to experience running elections where voter ID is required before it becomes compulsory. Full support would be available from Cabinet Office, not only for Electoral Services, but also for the Communications team.
- A pilot would give polling staff the opportunity to experience voter ID before the next parliamentary election.
- The cost of the pilots is met by Cabinet Office, including polling staff training.
- It is uncertain whether pilots will be continued after 2019.

Pilot process

The Returning Officer has submitted a formal application to Cabinet Office to take part in the pilots on the basis of voters being required to provide poll cards before they can vote, subject to confirmation by this Committee. All applications will be agreed by the Cabinet Office Electoral Integrity Project Board which comprises representatives of the Electoral Commission and the Association of Electoral Administrators. The decision to approve the pilots rests with the Minister for the Constitution who will need to be satisfied that the authority applying meets the criteria set out in the Electoral Integrity Pilots Prospectus.

Prospective pilot areas will be notified of the decision by 17 September 2019. If the Council is successful, discussions will begin with Cabinet Office in October. A programme of communications will also be drawn up so that electors are kept fully informed of the pilot and the fact that they will be required to take ID with them to vote at a polling station next year.

Report of the Interim Strategic Director

LOCAL GOVERNMENT OMBUDSMAN AND HOUSING OMBUDSMAN SERVICE ANNUAL REVIEW LETTERS

1. Purpose of report

To present the Local Government Ombudsman's (LGO) annual review letter and the Housing Ombudsman Service annual report to the Council and thereby promote all the Council's objectives.

2. Detail

The annual review letter from the Local Government Ombudsman is summarised at appendix 1. The annual report of the Housing Ombudsman Service is summarised at appendix 2.

Recommendation

The Committee is asked to NOTE the report.

Background papers

Nil

LOCAL GOVERNMENT OMBUDSMAN ANNUAL REVIEW LETTER

1. In 2017/18 the LGO received ten complaints about the Council. Of these, nine decisions were made, none were determined to be incomplete or invalid, two were provided with advice and three were referred back to the Council for local resolution; we have no way of knowing if these complainants did contact the Council. Annex A provides a breakdown of the complaints received and the decisions made. Annex B provides a comparison with neighbouring authorities
2. The purpose of the LGO annual letter is to help ensure that learning from complaints informs scrutiny at the local level. Supporting local scrutiny is one of the LGO's key business plan objectives. Its corporate strategy is based on remedying injustice and improving public services. The LGO has produced a complaints manual for Complaints Officers to assist their understanding of how the LGO investigate complaints. The manual can be found at www.lgo.org.uk/link-officers.
3. The LGO's *Annual Review of Local Government Complaints* shows that it upheld 0% of detailed investigations in 2017/18 – showing an improvement from the 75% upheld rate in 2016/17.

Local authority report – Broxtowe Borough Council – For the period ending – 31/03/2018

Complaints and enquiries received

Local Authority	Adult Care Services	Benefits and tax	Corporate and other services	Education and children’s services	Environmental services and public protection	Highways and transport	Housing	Planning and development	Other	Total
Broxtowe BC	0	0	0	0	3	1	5	1	0	10

Decisions made

Detailed investigations carried out									
Not Upheld	Upheld			Uphold Rate	Advice given	Closed after initial Enquiries	Incomplete/Invalid	Referred back for local resolution	Total
0	0			0%	2	4	0	4	9
Complaints Remedied									
By LGO	Satisfactorily by Authority before LGO involvement	Compliance Rate							
0	0	0%							

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Comparison with neighbouring authorities

The table shows how many complaints the LGO received and determined about neighbouring authorities.

Authority	Complaints received	Complaints determined	Complaints investigated & upheld	Complaints investigated & not upheld
Ashfield District Council	16	5	1	4
Bassetlaw District Council	18	6	3	3
Broxtowe Borough Council	9	0	0	0
Gedling Borough Council	7	0	0	0
Mansfield District Council	17	5	2	3
Newark & Sherwood District Council	16	0	0	0
Nottingham City Council	98	15	4	11
Nottinghamshire County Council	106	45	25	20
Rushcliffe Borough Council	11	3	3	0

HOUSING OMBUDSMAN SERVICE ANNUAL REPORT

The report sets out a year of significant change and positive achievement. The Housing Ombudsman has led an organisational review that is transforming the organisation with a new strategy based on her vision, *Housing Matters: Fairness Matters*.

The Housing Ombudsman Service (HoS) ensures the fair resolution of housing complaints, locally if possible. It works with landlords and residents to resolve individual complaints within the landlord's complaint procedure. If things go wrong they seek to put them right and encourage learning from outcomes. The HoS works with landlords and residents and facilitates improvements to complaint handling and service delivery. It aims to role model the service it expects of others.

The key highlights of the year are:

- It dealt with 14,445 complaints and enquiries, seeing a reduction from 15,112 for the 2017/18 period. Productivity increased significantly resulting in more cases being closed during the year than were received.
- In 2017/18, 79% of the complaints received were concluded without requiring a formal determination.
- Responsive repairs has continued to be the largest category of complaint received at 37% of the overall number.
- Timeliness has improved with a reduction in the average case time for complaints in our formal remit from nine months to eight months, and we continue to work towards achieving our six-month target. 100% of cases were determined within 12 months.
- The HoS have high levels of compliance with our orders – 99% are implemented within three months and 100% within six months.

The Housing Ombudsman said: *“Over the year we have successfully completed a range of activities to further develop our service for the benefit of our customers and made real progress against our targets. We carry forward a strong desire to improve further the service we provide and to use our experience and unique perspective of housing complaints to help shape better systems of redress for the future.”*

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Report of the Interim Strategic Director

WORK PROGRAMME

1. Purpose of report

To consider items for inclusion in the Work Programme for future meetings.

2. Background

Items which have already been suggested for inclusion in the Work Programme of future meetings are given below. Members are asked to consider any additional items that they may wish to see in the Programme.

3 December 2018	<ul style="list-style-type: none"> • Internal Audit Progress Report • Review of Strategic Risk Register • Proposals from Polling District Review • Member Induction Programme – May 2019 • Standards complaint update • Apprenticeship Strategy
18 March 2019	<ul style="list-style-type: none"> • Internal Audit Plan 2019/20 • Internal Audit Progress Report • External Audit Plan 2018/19 • Review of Strategic Risk Register

3. Dates of future meetings

The dates for future meetings have been confirmed as follows:

3 December 2018

18 March 2019

(All meetings to start at 7.00 pm)

<u>Recommendation</u>

The Committee is asked to CONSIDER the Work Programme and RESOLVE accordingly.

Background papers

Nil

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Annual Audit Letter 2017/18

**Broxtowe
Borough Council**

August 2018



A group of business professionals in a meeting, looking at documents. The image is a close-up, slightly blurred, showing several people in business attire. A woman with dark hair is on the left, looking down. A man with grey hair is in the center, also looking down. Another woman is on the right, partially visible. They appear to be in a meeting or conference room, looking at documents or a screen. The overall tone is professional and focused.

Section one

Summary for Governance, Audit & Standards Committee

Section one:

Summary for Governance, Audit & Standards Committee

This Annual Audit Letter summarises the outcome from our audit work at Broxtowe Borough Council ("the Authority") in relation to the 2017-18 audit year.

Although it is addressed to Members of the Authority, it is also intended to communicate these key messages to key external stakeholders, including members of the public, and will be placed on the Authority's website.

This is KPMG's last Annual Audit Letter to the Authority. We would like to take this opportunity to thank the Authority's officers and the members of the Governance, Audit and Standards Committee for their support throughout the six years of our audit appointment.

Audit opinion

We issued an unqualified opinion on the Authority's financial statements on 31 July 2018. This means that we believe the financial statements give a true and fair view of the financial position of the Authority and of its expenditure and income for the year. The financial statements also include the consolidated financial statements for Authority's Group, which consists of the Authority itself and Liberty Leisure.

Financial statements audit

Our audit procedures are designed to identify misstatements which are material to our opinion on the financial statements as a whole. Materiality for the Authority's accounts was set at £1 million which equates to around 1.8 percent of gross expenditure. We design our procedures to detect errors in specific accounts at a lower level of precision.

We report to the Governance, Audit and Standards Committee any misstatements of lesser amounts, other than those that are "clearly trivial", to the extent that these are identified by our audit work. In the context of the Authority, an individual difference is considered to be clearly trivial if it is less than £50,000 for the Authority.

Our audit work was designed to specifically address the following significant risks:

- **Valuation of PPE** - The Authority has adopted a rolling revaluation model which sees all land and buildings revalued over a five year cycle. As a result, assets may not be revalued for four years, creating a risk that the carrying value of those assets not revalued in year differs materially from the year end fair value. We determined that the valuation of land and buildings recognised in 2017-18 are appropriate.
- **Pensions Liabilities** - There is a risk that the assumptions and methodology used in the valuation of the Authority's pension obligation are not reasonable. As a result of our work, we determined that the valuation of pensions liabilities recognised in 2017-18 are appropriate. We identified that the Authority had taken advantage of making a lump sum payment in the year. As part of our audit an adjustment was required to the accounting treatment as the Authority had recognised a prepayment in its draft accounts which was inconsistent with the treatment adopted by the other members of the Pension scheme.
- **Faster Close** - Revised deadlines required draft accounts by 31 May and final signed accounts by 31 July. The Authority presented its accounts for audit on the required deadline and provided the supporting information to conduct an audit within the required timeframes.

Other information accompanying the financial statements

Whilst not explicitly covered by our audit opinion, we review other information that accompanies the financial statements to consider its material consistency with the audited accounts. This year we reviewed the Annual Governance Statement and Narrative Report. We concluded that they were consistent with our understanding and did not identify any issues.

Section one:

Summary for Governance, Audit & Standards Committee (cont.)

Whole of Government Accounts

The Authority prepares a consolidation pack to support the production of Whole of Government Accounts by HM Treasury. We are not required to review your pack in detail as the Authority falls below the threshold where an audit is required. As required by the guidance we have confirmed this with the National Audit Office.

Value for Money conclusion

We issued an unqualified conclusion on the Authority's arrangements to secure value for money (VFM conclusion) for 2017-18 on 31 July 2018. This means we are satisfied that during the year the Authority had appropriate arrangements for securing economy, efficiency and effectiveness in the use of its resources.

To arrive at our conclusion we looked at the Authority's arrangements to make informed decision making, sustainable resource deployment and working with partners and third parties.

Value for Money risk areas

We undertook a risk assessment as part of our VFM audit work to identify the key areas impacting on our VFM conclusion and considered the arrangements you have put in place to mitigate these risks.

Our work considered the a significant risk in respect of Financial Resilience. The Authority continues to face similar financial pressures and uncertainties to those experienced by others in the local government sector, such as the future of business rate distribution. We considered the Authority's Medium Term Financial Strategy, updated in February 2018, in which the Authority identified a potential shortfall in resources of £1.530m for the period 2018/19 to 2021/22, after including significant assumptions relating to achieving £1.0m of savings per annum and a vacancy saving of £0.3m. This requires the Authority to have significant focus on identifying and implementing its savings plans and addressing the residual shortfall over the medium term. The Authority has, however, underspent against budget in 2017-18 and is due to reflect this underspend and initial reduced pressure on its General Fund balances in its revised MTFS in October 2018.

High priority recommendations

We raised one high priority recommendation as a result of our 2017-18 work:

- **Embedded Procurement Arrangements** - The Authority should ensure that it has robust contract monitoring arrangements in place to retrospectively review contracts that expired in 2017-18 and for those contracts due to expire to be able to proactively fulfil obligations to initiate competitive tenders where applicable.

This is detailed in Appendix 1 together with the action plan agreed by management.

Section one:

Summary for Governance, Audit & Standards Committee (cont.)

Certificate

We issued our certificate on 31 July 2018. The certificate confirms that we have concluded the audit for 2017-18 in accordance with the requirements of the Local Audit & Accountability Act 2014 and the Code of Audit Practice.

Audit fee

Our fee for 2017-18 was £46,503 excluding VAT (2017: £86,269). Further detail is contained in Appendix 3.

Exercising of audit powers

We have a duty to consider whether to issue a report in the public interest about something we believe the Authority should consider, or if the public should know about.

We have not identified any matters that would require us to issue a public interest report.

In addition, we have not had to exercise any other audit powers under the Local Audit & Accountability Act 2014.

Acknowledgements

We would like to take this final opportunity to thank all officers and Members for their help and assistance over the many years that we have provided the external audit service to Broxtowe BC, and wish your organisation all the very best for the future.



Appendices

A close-up photograph of a person's hand holding a silver pen, writing on an orange sticky note attached to a whiteboard. The whiteboard is covered with several other colorful sticky notes in shades of pink, purple, and green. The background is a soft, out-of-focus blue.

Appendix 1:

High risk recommendations

This appendix summarises the high risk recommendations raised as a result of our audit.

High risk recommendations are defined as those issues that are fundamental and material to your system of internal control. We believe that these issues might mean that you do not meet a system objective or reduce (mitigate) a risk.

Details of lower risk recommendations can be found in our *ISA260 Report 2017-18*.

No.	Risk	Issue & Recommendation	Management Response
1	1	<p>Embedded procurement arrangements</p> <p>We sought to undertake testing of the Authority's contract register during our interim audit.</p> <p>We identified that following the departure of the Authority's Procurement Officer on 30 June 2017 the post had remained vacant throughout the remainder of the year. As a result the Authority's contract register was not up to date at the point of our review. Where contracts had expired or were due to expire, the Authority had made temporary arrangements to extended existing service provision. We note that since the end of the financial year the Authority now has a substantive Procurement and Contracts officer in post.</p> <p>Recommendation</p> <p>The Authority should ensure that it has robust contract monitoring arrangements in place to retrospectively review contracts that expired in 2017-18 and for those contracts due to expire to be able to proactively initiate competitive tenders where applicable.</p>	<p>The Council has appointed an interim Procurement and Contracts Officer with significant knowledge and expertise. He has been assigned a number of responsibilities including:</p> <ul style="list-style-type: none"> liaising with departments to ensure arrangements are put in place for contracts that have either expired or are due to; ensuring that effective contract management arrangements are embedded across the organisation; and refreshing the Council's Commissioning and Procurement Strategy. <p>The interim appointment commenced in May 2018 for an initial six month period whereupon consideration will be given to how the Council should proceed with ensuring that its procurement arrangements are effective and robust.</p> <p>Responsible Officer</p> <p>Head of Finance Services</p> <p>Implementation Deadline</p> <p>31 December 2018</p>

Follow up of previous recommendations

As part of our audit work we followed up on the Authority's progress against previous audit recommendations. The Authority has taken appropriate action to address the issues that we have previously highlighted through high priority recommendations, except for the three-way match control which is partially implemented. The Authority has taken steps to further remind teams of their responsibilities.

Our audit strategy in 2017-18 did not place reliance on three way match controls as the Authority seeks to strengthen compliance in these areas with the adoption of new systems.

Appendix 2:

Summary of reports issued

This appendix summarises the reports during the year. We issued our prior year Annual Audit Letter in March 2018. These reports can be accessed via the Governance, Audit and Standards Committee pages on the Authority's website at <https://www.broxtowe.gov.uk>.

Certification of Grants and Returns

This report summarised the outcome of our certification work on the Authority's 2016-17 grants and returns.

External Audit Plan

The External Audit Plan set out our approach to the audit of the Authority's financial statements, and to support the VFM conclusion.

Report to Those Charged with Governance

The Report to Those Charged with Governance summarised the results of our audit work for 2017-18 including key issues and recommendations raised as a result of our observations.

We also provided the mandatory declarations required under auditing standards as part of this report.

Auditor's Report

The Auditor's Report included our audit opinion on the financial statements along with our VFM conclusion and our certificate.

Annual Audit Letter

This Annual Audit Letter provides a summary of the results of our audit for 2017-18.

2018

January

February

March

April

May

June

July

August

September

October

Appendix 3:

Audit fees

This appendix provides information on our final fees for the 2017-18 audit.

External audit

Our final fee for the 2017-18 audit of the Authority was £46,503. This is in line with the Public Sector Audit Appointments Limited (PSAA) scale fee for 2017-18.

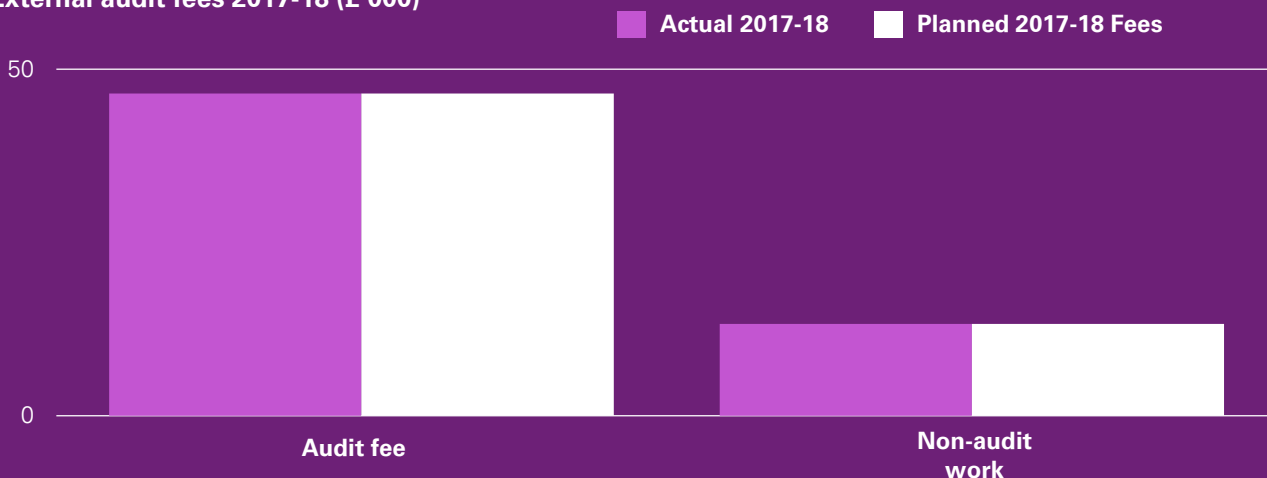
The PSAA scale fee for 2016-17 was £46,503. We raised an additional fee of £39,766 in 2016-17. This related to additional work we had to undertake in respect of the purchase of leasehold interest in Beeston Square and the production of Group accounts and other delays incurred in resolving issues during the course of the 2016/17 audit.

Other services

Under our terms of engagement with PSAA we undertake prescribed work in order to certify the Authority's 2017-18 housing benefit grant claim. This certification work is still ongoing, and the certification deadline is 30 November 2018. The PSAA scale fee for this work is £9,670 and the final fee will be confirmed through our reporting on the outcome of that work in January 2019.

We also charged £3,600 for Pooling of Housing Capital Receipts (work planned for September). This work was not related to our responsibilities under the Code of Audit Practice and was agreed through a separate Engagement Letter.

External audit fees 2017-18 (£'000)





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This report is addressed to the Authority and has been prepared for the sole use of the Authority. We take no responsibility to any member of staff acting in their individual capacities, or to third parties. We draw your attention to the Statement of Responsibilities of auditors and audited bodies, which is available on Public Sector Audit Appointment's website (www.psaa.co.uk).

External auditors do not act as a substitute for the audited body's own responsibility for putting in place proper arrangements to ensure that public business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively.

We are committed to providing you with a high quality service. If you have any concerns or are dissatisfied with any part of KPMG's work, in the first instance you should contact Andrew Cardoza the engagement lead to the Authority, who will try to resolve your complaint. If you are dissatisfied with your response please contact the national lead partner for all of KPMG's work under our contract with Public Sector Audit Appointments Limited, Andrew Sayers, by email to Andrew.Sayers@kpmg.co.uk. After this, if you are still dissatisfied with how your complaint has been handled you can access PSAA's complaints procedure by emailing generalenquiries@psaa.co.uk by telephoning 020 7072 7445 or by writing to Public Sector Audit Appointments Limited, 3rd Floor, Local Government House, Smith Square, London, SW1P 3HZ.

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Cabinet Office

Electoral Integrity Project - Local Elections 2018 - Evaluation

Elections Division
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Alternative format versions of this report are available on request from cg-analysis@cabinetoffice.gov.uk.

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We are also grateful for the support provided to each pilot site by their Electoral Management System provider and we thank them for their contributions to this evaluation.

Thanks go to the members of the Electoral Commission for their collaborative approach to the research who were integral to the design and evaluation of the pilots.

We are also appreciative of the support of the Association of Electoral Administrators and we thank them for their input.

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Executive Summary

During local elections in 2018, electoral administrators from eight Local Authorities (LAs), working alongside the Cabinet Office, the Electoral Commission and their Electoral Management Software (EMS) suppliers delivered voter ID and postal vote pilots as part of the Electoral Integrity Project (EIP). Five LAs participated in pilots with the aim to inform future design of the ID requirements and delivery mechanism for implementing the Government’s manifesto commitment for the national roll out of voter ID requirements in polling stations across Great Britain. Three LAs piloted measures to improve the security of the postal and proxy vote process.

Three models of ID were trialled at polling stations - the poll card model in Watford and Swindon, the mixed ID (photographic and non-photographic) model in Gosport and Bromley, and the photographic ID model in Woking. Three other sites, Peterborough, Tower Hamlets and Slough, piloted the postal/proxy vote process.

The models trialled were based on recommendations made by Sir Eric Pickles in his independent review into electoral fraud. We measured the impact of the voter ID requirement through a number of evidence strands: a pre and post election day public opinion survey; a polling station staff survey; data collected at polling stations; cost data collected by LAs; and qualitative interviews with electoral service teams in the participating LAs. We measured the impact of the postal/proxy measures through: a post election day public opinion survey; cost data collected by LAs; and qualitative interviews with electoral services teams. These data sources have also been used by the Electoral Commission in their independent evaluation.

To fully assess the different dimensions of the ID requirement, Cabinet Office evaluated the pilots through four themes: Integrity; Democracy and Equality; Delivery; and Affordability.

Overall, Integrity measures consistently increased in the photographic ID model, and showed varied results across sites in the mixed ID and poll card models. Confidence in how to go about casting a vote and satisfaction with the process of voting significantly increased post election day in the photographic ID model. Levels of confidence significantly increased in one of the two poll card model sites (Watford), but satisfaction remained

INTEGRITY	DEMOCRACY & EQUALITY
<i>We aimed to understand the impact of the ID requirement on public confidence in the security of the electoral system.</i>	<i>We aimed to understand the impact of the requirement on people’s participation in the democratic process.</i>
DELIVERY	AFFORDABILITY
<i>We aimed to understand the best mechanisms for delivery of the policy.</i>	<i>We aimed to understand the additional costs of rolling out the requirement in Great Britain.</i>

unchanged. In contrast, confidence remained unchanged in both mixed ID models, yet satisfaction significantly increased in one of the two mixed ID models (Gosport).

The perception of the occurrence of electoral fraud at a local level has significantly decreased, and perception of electoral fraud at a GB level significantly increased in the photographic ID and mixed ID models (although Gosport remains unchanged on perceptions of fraud at a GB level). In contrast, perceptions of levels of electoral fraud at a local level

significantly increased in one of the two poll card model sites (Swindon), and at a GB level (Watford).

Democracy and Equality measures were consistent across each authority. Based on the public opinion survey there is no indication that the ID requirements impacted the reasons for not voting for any specific demographic group across the participating authorities. The predominant reason cited for not voting, among those reported they did not vote in the May 2018 local elections, in all pilot models was 'too busy/other commitments'.

The most cited communication channel for awareness of the pilot was predominantly the poll card for the poll card model and the mixed ID model sites, with only electors in the photographic ID model citing a leaflet from the local council as being the most referenced communication source. All models found direct local sources to be the most effective communication method.

The most popular ID used was a driving licence in both the photographic and the mixed ID models, with the passport being the second most popular. The poll card was most popular in the poll card model, with a driving licence being used as a second favourite option.

Based on feedback from electoral services teams, most of the pilot requirements were able to be delivered in conjunction with business as usual activities for an election. Piloting authorities highlighted the importance of having enough time to plan for the extra requirements. Most piloting authorities were able to integrate voter ID training into the standard training and guidance given to polling station staff.

Perceptions of election day were largely positive across all models, with polling station staff giving positive feedback on the process, particularly in the poll card sites.

LAs would largely pilot the same approach again, with one of the mixed models (Bromley) citing they would reduce the number of ID options. The poll card model sites reflected that their model would need less of a behaviour change, with one citing that electors already bring their poll card to vote (Watford).

The central role that Cabinet Office and the Electoral Commission play were seen as being integral to further pilots or national roll out. All local authorities stated that a communication campaign would have to be centrally delivered, with one set of requirements nationally.

In order to assess the affordability of each ID pilot model, we have produced estimates for the additional costs of rolling out each model for a national poll. We have standardised the costs to allow comparisons to be drawn, and have omitted costs that were pilot-specific. There is an inherent degree of uncertainty in these estimates, primarily due to the small sample of participating Local Authorities. This is particularly acute for the Poll Card model, which required the use of technology in polling stations which was developed specifically for this pilot.

1. Context

1.1. Overview

In his review of electoral fraud¹ Sir Eric Pickles made 50 recommendations for tackling electoral fraud across polling station conduct, postal voting, and proxy voting. This included requiring voters to provide a form of identification at polling stations before voting, and six specific recommendations to address the potential for electoral fraud in postal voting².

The report recommended that the Government should consider options for electors to have to produce ID before voting at polling stations, noting that the Government may wish to pilot different methods. The Government included a commitment to national roll out of voter ID requirements across Great Britain in their manifesto. The Electoral Commission welcomed the pilots as a positive first step towards implementing its own recommendation that an accessible, proportionate voter identification scheme should be introduced in Great Britain

Currently, staff working in polling stations may ask two statutory questions to further establish the identity of a voter they suspect of a personation offence:

- Are you the person registered in the register of electors for this election as follows?
- Have you already voted here or elsewhere at this election, otherwise than as proxy for some other person?

These limited checks in polling stations mean that electoral fraud is hard to prevent and detect, and the lack of a mechanism for verifying voter identities was cited as the main vulnerability of polling station voting by respondents surveyed by the Electoral Commission.³

1.1.1. Reported Incidents of Electoral Fraud⁴

There were 336 reported incidents of alleged electoral fraud across the UK at the elections in 2015⁵. Nearly half of these cases (165) related to campaigning offences, over a quarter of the reported incidents (104) were related to fraudulent voting, and the remaining incidents related to nomination offences (25) and registration offences (36).

The most frequently reported type of voting fraud related to the offence of personation (i.e. voting as someone else). Of these incidents, 28 were reported as occurring at the polling station, and 22 when using a postal vote. In addition, there were 13 cases related to the offences of personation by proxy. The remaining 41 voting cases related to the offence of undue influence (14), breaches of secrecy requirements (8), attempts to tamper with ballot papers (3), alleged bribery (8), and treating (8).

¹ Cabinet Office (2016) Securing the ballot: review into electoral fraud <https://www.gov.uk/government/publications/securing-the-ballot-review-into-electoral-fraud> (accessed June 2018)

² Annex A contains the recommendations taken forward by Cabinet Office for piloting.

³ Electoral Commission, Electoral fraud in the UK, January 2014 http://www.electoralcommission.org.uk/_data/assets/pdf_file/0008/164609/Electoral-fraud-review-final-report.pdf

⁴ Electoral Commission, Analysis of cases of alleged electoral fraud in the UK in 2015, March 2016 http://www.electoralcommission.org.uk/_data/assets/pdf_file/0011/198533/Fraud-allegations-data-report-2015.pdf

⁵ Elections included: a UK Parliamentary election, elections for local councillors in metropolitan boroughs, district authorities and unitary authorities in England, elections for Mayors in six English local authorities, and a Parliamentary by-election.

Of these personation offences, it is possible that the requirement of photographic ID at the polling station could have prevented the perpetrator from voting as someone else in person. It is not clear what the impact of non-photographic identification would have had upon these offences, or upon offences of personation conducted by postal vote or proxy.

Government has been clear that electoral fraud is not a victimless crime, and worked with the Electoral Commission and Crimestoppers to support the 'Your Vote is Yours alone' campaign that ran alongside the local elections to encourage the reporting of suspected electoral crime.

1.1.2. Public Confidence

In 2014, the Electoral Commission⁶ commissioned research to find out more about public attitudes towards electoral fraud. Their research found that people do not have a deep understanding about electoral fraud but they do have a general concern about the possibility of fraud taking place.

The most recent report from the Electoral Commission Winter Tracker⁷ found that in general voting was considered to be safe from fraud or abuse by 84% of respondents, however greater confidence was placed in the safety of voting at a polling station (88%) than by post (73%). Additionally, when asked what single measure would be most effective in preventing electoral fraud, over a third of respondents supported a requirement to show photographic ID at the polling station (37%). Only 6% of respondents supported stopping postal voting on demand, yet 19% believed political parties, candidates, canvassers and campaigners should not be allowed to handle postal vote applications and postal ballot papers.

1.1.3. Research Need

Five LAs participated in pilots with the aim to inform future design of the ID requirements and delivery mechanism for implementing the Government's manifesto commitment for the roll out of voter ID requirements in polling stations across Great Britain. Three LAs piloted measures to improve the security of the postal and proxy vote process.

The pilots enabled electoral service teams to test a variety of photographic and non-photographic ID, the use of poll cards and the inclusion of additional information in a postal pack. The Cabinet Office communications team worked closely with each LA to ensure all electors were aware of the requirement to produce ID at the polling station.

⁶ Electoral Commission, Electoral fraud in the UK, January 2014
http://www.electoralcommission.org.uk/_data/assets/pdf_file/0008/164609/Electoral-fraud-review-final-report.pdf

⁷ Electoral Commission, Winter Tracking Research, March 2018
https://www.electoralcommission.org.uk/_data/assets/pdf_file/0015/244041/Winter-Tracker-Topline-findings-2018.pdf

Therefore research was needed to:

- Provide Parliament and other stakeholders with evidence of the effectiveness of proposed reforms to the statutory requirements of polling station and postal voting
- Inform policy decisions and provide considerations for implementation of changes to voting legislation where appropriate

In doing so we aim to make a comprehensive and evidence-based assessment of the impact of implementing new ID practices. We will determine how successful each model is in delivering the defined outcomes, in order to facilitate an informed decision about which measures should be implemented.

1.2. Report Overview

The next section introduces the overall aims and objectives of the pilots. This is followed by a section on the design of the pilots that details the models tested and areas involved in the pilots. The subsequent three sections present the methodology design, our findings by each model, and our conclusions.

2. Aims

2.1. ID Pilot Aims

Following the Government's commitment to rolling out voter ID requirements across Great Britain, the aims for the pilots were to inform the future design of the ID requirements and delivery mechanism for implementing national roll out of voter ID requirements in polling stations across Great Britain and to pilot measures to improve the security of the postal and proxy vote process

2.2. ID Pilot Policy Objectives

With the above aims considered, the agreed primary policy objectives for the pilots were to identify options for ID requirements and delivery mechanism for a voter ID process that:

- Will reduce in person electoral fraud
- Have a clear solution for each elector
- Can be used for all types of polls
- Can be delivered in any polling station
- Will enhance public confidence in the electoral system
- Are most straightforward for local authorities to deliver
- Result in the fewest numbers or particular groups of electors not turning out
- Result in the fewest numbers or particular groups of electors being unable to vote
- Minimise disruption or delays at polling stations
- Are least expensive
- Will not introduce new opportunities for electoral fraud
- Are most easily understood by the electorate
- Will minimise change

2.3. Postal Pilot Aims and Policy Objectives

Following the Government's commitment to piloting the inclusion of guidance in postal ballot packs on the secrecy of the vote and how to report electoral fraud, the following aims and policy objectives were agreed in Slough and Tower Hamlets:

- Reduce allegations and perception of postal voting fraud;
- Increase voters confidence in contacting the Returning Officer, police or Crimestoppers if they suspect fraudulent activity;
- Establish that postal voters complete and return their own postal ballot papers

Peterborough agreed the following aims and policy objectives:

- Improve the electoral process and take a tough stance in deterring individuals from committing electoral fraud;
- Assess different options aimed at reducing the possibility of electoral fraud relating to postal and proxy voting in order to uphold the integrity of the electoral system;
- Raise high level of awareness in relation to electoral fraud, ensuring that each elector casts their own vote without interference

3. Design

3.1. Legislative Requirements

The powers to make the pilot scheme orders are in section 10 of the Representation of the People Act 2000⁸ which was passed by Parliament. The powers enable changes to be made to the rules regarding the conduct of all local elections in England and Wales. The powers were exercised in the local elections in relation to all eight pilots. The Orders were not subject to Parliamentary process.

Two Statutory Instruments (SIs)^{9,10} were brought before Parliament to allow electoral pilot schemes to be run at Local Authority Mayoral and Combined Authority Mayoral elections. There is already provision for electoral pilot schemes to be run at local council elections. The SIs allowed the planned pilot schemes in two areas during May 2018 to go ahead, where these authorities held local mayoral elections along with their council elections.

The two SIs were debated and approved in the Commons and Lords in December 2017, after a deferred division on the floor in the House of Commons. The SIs were signed by Chris Skidmore MP, then Minister for the Constitution and made into law.

Four of the enabling voter ID pilot Orders were signed by the Chancellor of the Duchy of Lancaster and Minister for the Cabinet Office, and one pilot Order was signed by the Minister for the Constitution, and were published on 6 March 2018¹¹. The enabling legal instruments for the postal vote pilots were signed by the Minister for the Constitution and published on 18 April 2018¹².

The Electoral Commission is required under section 10 of the Representation of the People Act 2000 to evaluate every electoral pilot scheme, and report its findings within three months of the election.

3.2. Local Authority Areas

For the 2018 pilots, eight LAs piloted a mixture of ID and postal vote requirements. The ID requirements were piloted by five areas:

- Bromley
- Gosport
- Swindon
- Watford
- Woking

The postal vote and proxy requirements were piloted by three areas:

⁸ Representation of the People Act 2000

<https://www.legislation.gov.uk/ukpga/2000/2/contents>

⁹ The Combined Authorities (Mayoral Elections) (Amendment) Order 2018

<https://www.legislation.gov.uk/uksi/2018/19/contents/made>

¹⁰ The Local Authorities (Mayoral Elections) (England and Wales) (Amendment) Regulations 2018

<https://www.legislation.gov.uk/uksi/2018/20/contents/made>

¹¹ Cabinet Office (2018) Voter ID pilots for the local election in May 2018

<https://www.gov.uk/government/publications/voter-id-pilots> (accessed June 2018)

¹² Cabinet Office (2018) Postal and proxy vote pilot schemes in May 2018

<https://www.gov.uk/government/publications/postal-and-proxy-vote-pilot-schemes> (accessed June 2018)

- Peterborough
- Slough
- Tower Hamlets

3.3. Selection Process

The opportunity to pilot voter ID in May 2018 was offered to all LAs in Great Britain and five committed to do so. An Electoral Integrity Pilots prospectus¹³ was published on GOV.UK in March 2017. It confirmed the approach to piloting and set out how authorities could submit an expression of interest. The Cabinet Office then worked closely with interested authorities to develop realistic research criteria and practical delivery plans.

Following initial discussions, authorities were invited to submit a formal application if committed to participating and if they met selection criteria. These formal applications were agreed by the Cabinet Office Electoral Integrity Project Board which includes representatives from the Electoral Commission and the Association of Electoral Administrators (AEA), with the Minister for the Constitution approving the final selected authorities.

Annex C contains further detail on the selection criteria.

3.4. Delivery Partners

The key delivery partners for these pilots were the electoral service team in each LA and the Electoral Management System (EMS) supplier teams.

3.4.1. EMS Supplier Delivery

EMS suppliers developed the functionality for Returning Officers (ROs) to administer the pilots. They amended registers for polling station staff to record essential data for evaluation, such as the types of ID used.

They also delivered functionality for the technology enabled pilots in Swindon and Watford. Poll cards included barcodes that were scanned using tablets on election day for validation. Polling station staff also used the tablets to record data for the evaluation.

The suppliers provided electoral service teams in the pilot authorities with training and ongoing support, including on election day.

3.4.2. RO Delivery

While EMS functionality allowed automated reporting on poll card outcomes, we were reliant on the electoral service teams to record key data relating to election day and the monetary and resource costs of administering the ID and postal requirements.

3.4.3. Electoral Commission

The Electoral Commission has a statutory duty to evaluate every electoral pilot scheme, and report its findings within three months of the election. The Electoral Commission provided support and scrutiny as part of the development of the pilots, and Cabinet Office worked closely with the Electoral Commission during the design and evaluation of the ID and Postal/Proxy voting pilots.

¹³ Cabinet Office (2017) Prospectus on Electoral Integrity Pilots in May 2018
<https://www.gov.uk/government/publications/prospectus-on-electoral-integrity-pilots-in-may-2018>
 (accessed June 2018)

3.4.4. Cabinet Office

The Cabinet Office helped with the set-up and running of the pilots, and recorded qualitative data on the electoral service teams experience of managing the pilots to help obtain evidence for the pilot research objectives.

3.5. ID Pilot Models

The Cabinet Office worked closely with LAs to design and deliver the voter ID pilots, and locally issued council ID was made available free of charge whenever an elector was unsure they were able to produce the required ID. Annex D contains the full list of accepted photographic and non-photographic ID for each piloting authority, and the deadlines for issuing council ID.

3.5.1. Poll Card Model

Swindon and Watford tested a poll card model, whereby electors were required to provide their poll card. Limited back up IDs (photographic ID for Swindon, and both photographic and non-photographic ID for Watford) were accepted in the absence of a poll card.

In Swindon specifically, if an elector did not have their poll card or other acceptable ID, they were able to bring someone with them to attest their identity. The person attesting needed to be registered at the same polling station, and have proved their identity by presenting their poll card or other form of specified ID. If an elector was unable to present the specified ID, or have someone attest to their identity, they were refused a ballot paper and were unable to vote.

3.5.2. Mixed ID Model

Bromley and Gosport tested a mixed model, whereby electors were required to provide photographic ID, or a combination of two forms of non-photographic ID, from a pre-approved list. If an elector was unable to present this ID, they were refused a ballot paper and were unable to vote.

3.5.3. Photographic ID Model

Woking tested a photographic ID only model, whereby electors were required to provide a valid form of photographic ID from a pre-approved list (e.g. a UK, EU or Commonwealth passport, or a UK Driving Licence). If an elector was unable to present this ID, they were refused a ballot paper and were unable to vote.

3.6. Postal and Proxy Pilot Models

3.6.1. Peterborough

Peterborough included a leaflet in all postal vote packs to inform electors about the secrecy of the vote and provided details of the relevant organisation to contact if fraud was suspected.

A selection of postal voters had their postal ballot packs personally delivered by council staff to ensure the right person received their vote.

Peterborough also tested ID at polling stations for proxy voters. Only proxy voters providing photographic ID from a pre-approved list would be issued a ballot paper and allowed to vote. Annex D contains the full list of accepted IDs.

3.6.2. Slough

Slough included a leaflet in all postal vote packs to inform electors about the secrecy of the vote and provided details of the relevant organisation to contact if fraud was suspected. A sample of postal voters were contacted to complete a face-to-face survey shortly after postal vote dispatch to confirm receipt.

3.6.3. Tower Hamlets

Tower Hamlets included a leaflet in all postal vote packs to inform electors about the secrecy of the vote and provided details of the relevant organisation to contact if fraud was suspected. A random sample of postal voters were contacted to complete a telephone survey shortly after postal vote dispatch to confirm receipt. A second survey was conducted after each opening session to confirm if the elector had completed and returned the pack.

4. Methodology

We decided to conduct a process evaluation as the overarching framework for evaluating the pilots, to help understand how local areas and electoral services teams would respond and implement ID requirements if they were rolled out nationally.

4.1. Research Objective

Considering the overall aims and policy objectives outlined in section 2, our primary research objective was to understand:

What ID requirements and delivery mechanism should be rolled out nationally?

4.2. Research Questions

To understand the full scope of the ID and delivery mechanism required for national roll out, we considered four themes: Integrity; Democracy and Equality; Delivery; and Affordability. Each theme had multiple research questions that helped frame our research design, analysis and evaluation and were considered alongside limitations of methodology. These research questions are noted in Annex E.

4.3. Data Sources

We used a number of evidence strands to address each theme.

4.3.1. Polling station data (ID pilot only)

This data was manually collected data recorded by polling station staff on election day. It was collected on paper by Gosport, Bromley and Woking, and electronically by Swindon and Watford. It includes key metrics such as ID used, electors turned away, and electors that returned to vote.

4.3.2. Local Authority data (ID pilot only)

This data was collected by LAs through the course of the pilots. It includes measures of new activity as a result of the pilot, such as the amount of local IDs issued by councils, as well as standard measures collected during an election, such as the overall turnout for each piloting authority.

4.3.3. ID Pilots public opinion survey - pre and post election day (ID pilot only)

Cabinet Office commissioned Bostock Marketing Group (BMG) Research to conduct a survey to assess public opinion and understanding of the ID requirements, and the impact it could have on voting behaviour and confidence in the electoral system.

The survey was conducted via face-to-face interviews in two waves: pre election day and post election day. This allowed us to understand if the requirements trialled had any impact on perceptions and claimed behaviour. “Comparator” authorities, matched with each LA based on demographic indices, were surveyed to provide a baseline for measurement of perceptions, and to indicate potential impact of the requirements.

The sample of the survey was representative of age, gender, ethnic group and socio-economic grade in each of the participating LAs, and also included a group that is demographically representative of England. This allowed us to understand any impact of the

requirement on particular groups and give a national benchmark. A breakdown of each sample size achieved in each pilot area is noted below (Table 1).

Table 1: Number of people interviewed in the ID pilots public opinion survey

ID pilot local authority				
	Pre Election day	Margin of Error (-/+%)	Post Election day	Margin of Error (-/+%)
Swindon	516	4.31	507	4.35
Watford	501	4.36	505	4.35
Bromley ¹⁴	625	3.91	500	4.38
Gosport	511	4.32	502	4.36
Woking	503	4.36	502	4.36
Comparators				
	Pre Election day	Margin of Error (-/+%)	Post Election day	Margin of Error (-/+%)
Bexley	253	6.16	251	6.18
Redditch	251	6.17	251	6.17
Richmond	255	6.13	252	6.17
England National Comparator	504	4.37	506	4.36

The Electoral Commission also conducted a pre and post election day public opinion survey.

4.3.4. Postal Pilots public opinion survey - post election day (Postal pilot only)

We commissioned BMG research to conduct a survey to assess confidence in the electoral system and understanding of the leaflet included in postal packs in Peterborough, Slough and Tower Hamlets. Specifically, the survey sought to understand how the guidance included in the postal packs impacted elector awareness of the secrecy of the vote, to what extent electors understood the guidance, and elector understanding of the mechanisms for reporting suspicion of fraudulent postal voting.

The survey was conducted via post with a random sample of 2,000 postal voters in each authority, after election day. A breakdown of each sample size achieved in each pilot area is noted below (Table 2).

¹⁴ Higher sample size due to additional days of fieldwork

Table 2: Number of returned postal pilot questionnaires from public opinion survey

Postal pilot local authority	
Peterborough	487
Slough	334
Tower Hamlets	323

4.3.5. Electoral service team interviews

We conducted in depth interviews with electoral service staff in the weeks following election day. These interviews provide rich qualitative data on the planning of the pilot, and the wider impact and delivery of the ID requirements.

4.3.6. Polling station staff survey (ID pilot only)

This survey was conducted by the Electoral Commission. Polling station staff filled in the survey on election day and indicated their views on their experience of polling day as a staff member and for electors. The survey was completed by 1,425 polling station staff across each of the piloting LAs (307 in Swindon, 135 in Watford, 733 in Bromley, 137 in Gosport, and 116 in Woking).

4.3.7. Postal vote data (Postal pilot only)

This data was collated by LAs on the number of people contacted, the number of people that provided information, the number of people that confirmed they did not apply for a postal vote, the number of people that confirmed that did not receive a postal ballot pack, the number of cases referred to the police in relation to postal vote fraud and the number of postal ballot packs issued but not returned. These evaluation metrics were defined in the postal order.

4.3.8. Cost data

LAs manually recorded the costs incurred while delivering the pilots, and provided estimates of the costs they incurred. We additionally collected cost data directly from the pilot authorities and supplemented it with data from Elections Claims Unit and detailed wage data from the Cabinet Office Electoral Registration Officer (ERO) cost survey.

4.4. Limitations of Approach

The limitations outlined below were taken into consideration when conducting the research. Although the limitations were taken into consideration, there was clear rationale and advantages to the approaches taken. The combination of the different research methods also improved understanding as a variety of sources could be taken into account when reporting the key findings. The measures provide the foundations, and a benchmark for, a broader evidence base to be developed to understand how the ID requirement will impact electors and mechanisms for delivery broadly.

4.4.1. Capturing perceptions

Perceptions of fraud are difficult to capture in an unbiased way, in that asking about fraud may cause people to believe the problem is endemic. We cannot track changes in

perceptions to a specific policy, as short- or long-term changes can be a result of events which cannot be controlled for, including media reporting or the introduction of counter-fraud policies.

4.4.2. Proving causation

We have compared the number of cases of alleged electoral fraud during the May 2018 election with previous years¹⁵. We are not able to compare cases of proven electoral fraud, as these have not progressed from allegations by the time of this publication. It is not possible to directly attribute any change in number of allegations or proven cases of electoral fraud to the introduction of the ID requirements. It is highly unlikely we would be able to attribute any change in numbers of postal voting fraud to the introduction of awareness methods (enclosing leaflets in postal packs or Crimestoppers contact details) and extra checks (door knocking or telephone calls) as this data is slow to emerge. We are reliant on evidence from the public opinion survey and self-reporting from electoral service teams, to indicate likely outcomes but these will be inferred and will not be able to prove cause and effect.

4.4.3. Generalising results

While we are confident in the robustness of the findings within each participating authority, there are limitations to the extent to which the findings of the evaluation can be generalised to indicate outcomes across Great Britain. The LAs participating in the pilots do not involve areas in Wales or Valuation Joint Boards (VJBs) in Scotland, and there are very few areas in total participating. Participating authorities share many characteristics and are not nationally representative¹⁶. We have not been able to assess the impact on all types of areas or electors. Further to this, we cannot say what the long-term impact could be when a policy beds in.

There are also limitations as to whether we can say a specific set of requirements would have the same impact or outcomes elsewhere. Each LA is trialing unique ID requirements, and we will not be able to generalise our results to other LAs/VJBs, with different characteristics and different population demographics and contexts.

Finally, these pilots were conducted during Local Elections, and we have not be able to generalise our results to other types of polls, notably UK Parliamentary General Elections (UKPGE) where a different electorate is eligible to vote, and a different group of electors may intend to vote.

4.4.4. Data source limitations

4.4.4.1. Polling station data

As outlined in section 4.3, we used a number of different data sources to evaluate the success of the pilot and to address the research objective. Our analysis of polling station data was supplemented with different qualitative and quantitative research approaches.

A key source of data was information received from polling stations, which provided data on the types of ID used, number of electors turned away, and number of electors that returned

¹⁵ At the time of publication, no allegations of electoral fraud had been received in the piloting authorities. Previous cases of alleged electoral fraud can be found in Annex B.

¹⁶ All piloting authorities broadly share the same characteristics, with the exception of Watford that has a large net BAME population of 28.08%. Swindon and Gosport also have the highest percentage of no passport held (18.26% and 21.38% respectively).

with correct ID. There remains a burden on polling station staff to record large volumes of information at the polling station, so we only included data collection we felt was justified in answering the research questions without putting a considerable amount of additional pressure on staff.

4.4.4.2. Cost data

LAs were asked to provide detailed accounts of all the additional costs incurred by the running of the pilot, and these were supplemented by standardised cost data forms. This allowed costs to be separated into definable categories, to identify costs that were pilot-specific (and therefore would not be incurred if requirements were rolled out nationally), and isolate the net additional costs of introducing new identification requirements.

The standardised forms were provided to ensure that there was an exhaustive ledger of additional costs, and to provide a consistent basis to draw comparisons between different models. This data is self-reported, and not receipt-based; as such, there is the potential for inaccuracy, though based upon our discussions with administrators we believe the scope for inaccuracy is limited.

The cost data evidence base was collated from five LAs across the three models. This is too small a sample to be nationally representative. As such, we have employed sensitivity analysis (i.e. variation in costs) to account for the level of uncertainty in calculating the additional costs of each model type when rolled out nationally. The uncertainty arising from such a small sample is mitigated in part by the detailed cost data from previous elections provided by the Elections Claims Unit, allowing us to account for differences in costs across the country. This was supplemented by an extensive cost survey of over 240 EROs across England, Scotland and Wales. The steps taken to utilise this data and to lessen the impact of these limitations are outlined in Annex F.

Several costs incurred during the pilot will be specific to the running of the pilot, and would not be relevant if ID requirements were rolled out nationally. For example, there were significant additional expenses incurred on local advertising and communication campaigns relative to a usual election, though we have excluded these on the basis that the need for additional advertising would diminish with the presence of a coordinated national advertising campaign. Details of costs that have been omitted in our estimates are explored in Annex F.

4.4.4.3. Electoral service team interviews

We supplemented the polling station data with qualitative research, such as interviews. The interviews used semi-structured topic guides, which included a list of topics to cover that would help address the key research objective and questions. The semi-structured nature of the sessions meant that LA staff were given flexibility to expand on topics they felt were important, allowing us to gain greater insights into individual experience and how the pilots were delivered within different authorities.

Qualitative research is criticised for being subjective and open to biases during the analysis of data. To overcome this limitation to some extent, we shared our initial analysis with electoral service teams to allow them to feedback on the findings and conclusions that had been drawn.

4.4.4.4. Pre and post election day public opinion survey

Electors would have had limited exposure to the policy given traditionally low turnout for local elections, meaning any conclusions drawn from the survey may have limited experiential evidence value. Further to this, we cannot prevent misleading responses or reporting that deliberately seeks to undermine the policy.

4.5. Ethical Considerations

The pilot orders were supported by Equality Impact Assessments that were completed by each piloting authority to ensure the ID requirements did not impact adversely on particular groups with protected characteristics. These assessments took into account the needs of different communities and wherever possible, LAs worked with any groups that were concerned about the impact of the ID requirements.

Not all types of identification are universally held by individuals who are eligible to vote in polls in GB¹⁷, and it was important that we maintained the accessibility of the polls. At the same time, we aimed to enhance electors' confidence in the system in which they are participating on election day. The types of ID that we tested through these pilots aimed to balance these two requirements. As a result, any elector unable to comply and produce the necessary identification were offered another available option for proving their identity. Locally issued council ID was made available whenever an elector was unsure they were able to produce the required ID, be it photographic or not.

When conducting the research, ethical and data issues were considered. For example, informed consent was obtained from each participant who took part in an interview prior to recording. When conducting survey and interview research, electoral service teams, polling station staff, and the public were first made aware of what their data would be used for and who it would be shared with. We also informed participants that all data would be anonymised and not used in a manner that would allow identification of individuals.

All research participation was optional and participants could withdraw their consent at any point during the process. The public opinion survey fieldwork was carried out under the guidelines set out by the Market Research Code of Conduct.

¹⁷ Census data indicates that passports are not held for 18.3% of the population in Swindon, 10.1% in Watford, 9.6% in Bromley, 21.4% in Gosport, and 9.3% in Woking. Across England and Wales, 16.9% of the population do not hold a passport.

5. Findings

The below sections outline how to interpret findings, and gives an overview of key findings followed by detailed analysis of each model piloted¹⁸.

5.1. Interpreting Findings

5.1.1. Themes

Our research questions were split across four themes: Integrity; Democracy and Equality; Delivery; and Affordability. These are defined below in Table 3.

Table 3: Themes across pilots

Theme	Definition	Key Measures
Integrity	Ensuring public confidence in the security of the electoral system remains high	Perceptions of the voting process (confidence in knowing how to vote, voting satisfaction) and perceptions of electoral fraud (safeguards and secrecy of the vote, polling station security, and occurrence of fraud in local area versus Great Britain)
Democracy and Equality	Ensuring that the ID requirements being trialled do not prohibit electors from voting where eligible, and do not create more barriers for participation in the democratic process	Awareness of the pilot (recall of ID requirements and channel communications), voting behaviour (reasons for not voting and ID used), and attitudes towards the pilot requirements
Delivery	Ensuring that the ID requirements can be delivered successfully	Electoral service teams planning and resourcing considerations, delivery of training , and working with delivery partners
Affordability	Measuring changes, if any, to the monetary cost of delivering elections with ID requirements, including implementation and ongoing delivery	Affordability through cost modeling of national roll out including costs of hiring additional members of staff, training staff members, any additional facilities required, and the cost of issuing ID.

¹⁸ Unless otherwise stated, all averages referred to represent the arithmetic mean of averages.

5.1.2. Dictionary of Terms

Table 4 below refers to the terms categorising key points of information used throughout the report.

Table 4: Dictionary of Terms

Term	Definition
Awareness	Awareness among all people aged 18 or older and were eligible to vote in the local election
Ballots Issued	The number of people who were issued a ballot paper
Comparator Local Authority	Non-piloting Local Authority matched on the Indices of multiple deprivation score with piloting Local Authority. Bromley, Swindon and Watford were matched with Bexley, Gosport was matched with Redditch and Woking was matched with Richmond
Election Day	3rd May 2018 polling day in the UK
Electoral Service Team	Council staff who oversaw the pilots - including Electoral Returning Officer, and Electoral Service Manager
Eligible Elector	An individual who can register to vote as they meet the eligibility requirements of age and nationality
England Comparator	Responses from randomly sampled Local Authorities across England ¹⁹ to provide comparative results at a national level
Indices of Multiple Deprivation	A combined measure of deprivation based on a total of 37 separate indicators that have been grouped into seven domains, each of which reflects a different aspect of deprivation experienced by individuals living in an area
Low/central/high estimate	Cost modelling assumptions have been varied to include a low and high estimate in order to account for any uncertainty
No ID	The number of people that brought no ID
People checked	The addition of the number of people who were issued a ballot paper and the number of people who experienced process handling
People who did not return	The number of people who were originally turned away who did not return
Polling Station Staff	Presiding Officers, Poll clerks and Polling Station Inspectors
Process Handling	The number of people who were not issued a ballot on their first

¹⁹ Amber Valley, Birmingham, Calderdale, Cambridge, Carlisle, Cheltenham, Croydon, Daventry, Exeter, Hartlepool, Kensington and Chelsea, Manchester, Merton, Oxford, Plymouth, Redbridge, Solihull, Thurrock, Wakefield, Welwyn Hatfield, West Oxfordshire, Wigan, Worcester, Worthing.

	attempt because they did not comply with the ID requirements
Returned	The number of people who were originally turned away who returned and cast their vote
Socio-Economic Grouping	A classification that groups people with a similar social and economic status. Breakdown of groups is as follows: SEG A refers to people from an upper middle class background, SEG B refers to people from a middle class background, SEG C1 refers to people from a lower middle class background, SEG C2 refers to people from a skilled working class background, SEG D refers to people from a working class background, SEG E refers to people from a non-working background
Wrong ID	The number of people that brought the wrong ID

5.1.3. Statistical Significance

When comparing the results between sites and pre/post election day waves in the commissioned survey we have noted where the difference is statistically significant. A result is said to be statistically significant if it is likely not caused by random chance but is instead more likely to be attributable to differences between the sites or waves. We tested for statistical significance where $p < 0.05$.

Where a result is not statistically significant we cannot be certain that the difference was not caused by chance.

5.2. Poll Card Model

The poll card requirement was piloted by Swindon and Watford.

Key Findings

Integrity

Swindon and Watford showed mixed results, with Watford showing more positive movement on electors attitudes towards the Integrity measures after election day than Swindon.

- **Confidence in knowing how to vote:** significantly increased post election day in Watford (91% to 95%) but did not change in Swindon (96%)
- **Satisfaction with the voting process:** did not change in both Swindon (85%) and Watford (86%)
- **Sufficient safeguards to prevent electoral fraud:** significantly increased post election day in Watford (38% to 53%) but did not change in Swindon (47%)
- **Belief that polling stations are safe from fraud and abuse:** significantly increased post election day in Watford (83% to 88%) but did not change in Swindon (80%)
- **Perception that photographic ID would stop electoral fraud:** significantly increased post election day in Watford (61% to 71%) but did not change in Swindon (73%)
- **Perception that non-photographic ID would stop electoral fraud:** significantly increased post election day in Watford (41% to 49%) but did not change in Swindon (33%)
- **Perception of local fraud occurring:** significantly increased post election day in Swindon (4% to 7%) but did not change in Watford (7%)
- **Perception of fraud in GB occurring:** significantly increased post election day by eight percentage points in Watford (16% to 24%) but did not change in Swindon (21%)

Democracy and Equality

Awareness in the poll card model was significantly higher in Swindon.

- **The number of people who did not return to vote:** 67 across both pilot sites (0.11% of people checked). In Swindon 25 people did not return (0.06% of people checked) and in Watford 42 people did not return (0.22% of people checked)
- **Awareness of the ID requirements:** 79% in Swindon and 58% in Watford among eligible electors post election day
- **Most cited channel for finding out about the ID requirement:** the poll card in both Swindon (56%) and Watford (50%), with direct channels having a greater impact than indirect resources
- **Reason for not voting among those who reported they did not vote:** 'Too busy/other commitments' was the most popular reason in both Swindon (26%) and Watford (52%)

Delivery

Polling station staff were generally confident in the delivery of the poll card model and electoral service teams thought the poll card model would need the least behavioural change among electors.

- **Most popular ID type used:** poll card in both Swindon (95%) and Watford (87%)
- **Polling station staff confidence in delivering the requirements:** was 99% in Swindon and 97% in Watford

Affordability

The poll card model is expected to cost between £4.3m and £20.4m per UKPGE excluding the cost of IT equipment required in polling stations.

5.2.1. Integrity

Perceptions of the voting process

The public opinion survey results indicate that the requirement to show ID had significantly increased confidence in knowing how to vote post election day in Watford by four percentage points (91% to 95%). In contrast, confidence did not significantly change post election day in Swindon (96%) but the level was significantly higher than the England comparator group (92%). In Swindon, BAME groups show lower confidence (90%). This is independent of the ID requirements as confidence was in line with pre election day levels (83%).

Levels of satisfaction with the process of voting in both poll card pilots post election day remained the same in Swindon (85%) and Watford (86%). There was a significant difference between the poll card model and the comparator LA where the pilot sites were significantly more satisfied in the voting process than the comparator LA (78%, Bexley). Those from a lower socio-economic background, SEG C2, were less satisfied with the process of voting in Swindon (77%). This is independent of the ID requirements as satisfaction was in line with pre election day levels (80%).

Perceptions of electoral fraud

There have been no historical electoral fraud allegations in Swindon but a small proportion in Watford (Annex B). There have been no allegations made for the 2018 Local Elections, in either area, at the time of this publication.

The proportion of electors who believed there were sufficient safeguards in place to prevent electoral fraud in polling stations significantly increased in Watford post election day by 15 percentage points (38% to 53%). There was no significant change post election day in Swindon (47%). Electors in the comparator LA group were less likely to agree with the statement than in Watford (45%, Bexley).

The proportion who feel that voting in polling stations is safe from fraud and abuse significantly increased in Watford post election day by five percentage points (83% to 88%). In Swindon sentiment towards this did not significantly change following the pilot (80%).

The perception that having to produce photographic ID in polling stations would be an effective measure to prevent electoral fraud significantly increased post election day in Watford by 10 percentage points (61% to 71%) but did not change in Swindon (73%). Similarly, the perception that having to produce non-photographic ID in polling stations would be an effective measure to prevent electoral fraud significantly increased post election day in Watford by eight percentage points (41% to 49%) but did not change in Swindon (33%).

Perception of fraud being prevalent locally significantly increased post election day in Swindon by three percentage points (4% to 7%) but remained unchanged post election day in Watford (7%). In contrast, perception of electoral fraud occurring in GB significantly increased post election day by eight percentage points in Watford (16% to 24%) but remained the same in Swindon post election day (21%).

Overall, polling station staff found that the ID requirements made the process of voting in the poll card pilots more secure. The polling station staff survey results indicate that 75% of

polling station staff in Watford and 64% in Swindon agreed with the statement that voting was more secure because voters had to prove their identity.

5.2.2. Democracy and Equality

Awareness of the pilot

Awareness of the pilot requirements among all eligible electors was significantly higher in Swindon (79%) than in Watford (58%). It is unclear what is driving the lower level of awareness in Watford. As noted below, turnout in Watford increased compared to 2016 local elections, and the proportion of people who did not return to vote was in line with other piloting authorities.

Most electors in Swindon (56%) and Watford (50%) found out about the pilot through their poll card. 24% of people who took part in the public opinion survey recalled receiving a leaflet from Swindon Borough Council and 39% of people reported receiving a leaflet from Watford Borough Council. Hearing about the pilot through local media was recalled slightly more often than national media in Swindon (21% and 13% respectively) and in Watford (36% and 29% respectively). In Swindon, eight percent of eligible electors recalled finding out about the pilot on a poster from the local council, whereas in Watford this figure was much higher (21%).

In both LAs, polling station staff reported being confident that voters were aware they would be required to present ID before being issued their ballot paper (94% in Swindon and 96% in Watford).

Intention to vote

The public opinion survey showed that in pilot areas the ID requirements did not have an impact on most electors reported intention to vote.

While it is not possible to link the introduction of voter ID to actual turnout, official turnout figures for the 2018 local election was 39.43% in Swindon (up 5.40% percentage points from the 2016 election; the highest increase in turnout of all pilots) and 39.28% in Watford (up 2.57% percentage points from the 2016 local elections).

In total, the number of people who did not return to vote across both pilots was 67, which represented 0.11% of people checked. This breaks down to 25 people in Swindon (0.06% of people checked), and 42 in Watford (0.22% of people checked)²⁰ not returning to vote. These levels are in line with other pilots, with Swindon marginally lower than any other pilot site.

On election day, 99% of polling station staff in Swindon and 98% in Watford agreed that the majority of voters were able to provide a correct form of ID.

Those who reported not voting in the 2018 local elections cited a variety of reasons for not voting (Annex G). The most cited reason was 'too busy/other commitments' (26% in Swindon and 52% in Watford).

In both pilot areas it was clear that the majority of people followed the primary requirement to bring their poll card to cast their vote (95% in Swindon and 87% in Watford). The second

²⁰ 24 people in Watford were recorded as entering the polling station without the ID requirements but left no details, so were unable to be tracked to check if they were eligible or returned.

most common form of ID used was a driving licence (4% in Swindon and 8% in Watford). The third most common form of ID used in Swindon was a passport, that was used in one percent of cases, whereas in Watford this was a debit/credit card, used in three percent of cases.

The poll card acted as council issued ID; with Swindon issuing 66 replacement poll cards and Watford issuing 3 replacement poll cards in total. In addition, Swindon offered attestation at the polling station for people who did not comply with the ID requirements. In total, 107 people cast their vote on election day in Swindon through attestation (0.25% of ballots issued).

5.2.3. Delivery

Planning and resourcing

In both Swindon and Watford almost all polling station staff agreed or strongly agreed that they had successfully delivered the ID requirements in their polling stations on election day (99% and 97% respectively).

During the electoral service team interviews, both pilot sites were interested in piloting the poll card as they saw it as more “inclusive”, with Watford seeing the requirements as a natural progression of a practice already taking place in polling stations. They emphasised that a behaviour change would not be needed as electors already come to vote with their poll card in a lot of instances. Their key assumption when planning which requirements to use was that being on the register acts as an identity proof, and that the poll card is a verification of that process and a logical next step.

The majority of polling station staff in Swindon and Watford agreed or strongly agreed they had everything they needed on election day to deliver the pilots, both in terms of space and equipment (98% and 93% respectively).

Training

Both pilot areas took different approaches to train their polling station staff to deliver the technology requirements in advance of election day.

Swindon included a bespoke four day EMS supplier training on the technology in addition to standard training. They reflected that the training was lengthy but necessary to ensure all staff were trained to use the tablets. Feedback from staff highlighted that they were initially apprehensive, but following training were really positive about the process. This was reflected in their overall perception of the day, with staff giving Swindon positive feedback on using the tablets, and even suggested incorporating the Corresponding Number List (CNL) as well as the register on the tablet. Swindon also noted that by collecting the information offline they removed the risk caused by any issues with the wifi.

Watford ran training on the technology in a face-to-face format focusing on issues that could arise on election day. Overall, feedback from training was positive with staff noting that training would become more integrated with regular training procedure as they became more familiar with the requirements. Feedback was very positive on election day, with Watford citing that staff coped well with the requirements on the day.

The polling station staff survey results also indicate that the majority felt that the instructions on how to deliver and use the technology were clear, with 93% of polling station staff agreeing or strongly agreeing in Swindon, and 92% of staff in Watford.

Working with delivery partners

Reflecting on election day, the electoral service team in Swindon were positive about the possibility of delivering the poll card model again, even mentioning that some polling station staff may find it difficult to revert back to the old process. Similarly, Watford felt they would pilot the poll card again, citing that their requirements were a good compromise for electors.

Both sites felt the system worked well on election day - with Swindon citing an example of a husband and wife accidentally trying to use the same poll card, but the system spotted and flagged this. The Watford team felt that the technology made the poll card feel more secure and sped up the process.

Both poll card pilots stressed that the EMS suppliers were integral to the success of delivering the requirements, with Swindon emphasising that the EMS supplier training was crucial. Swindon also stressed that although there were upfront development costs, another benefit of the technology may be reducing polling station staff levels in future. Watford noted that the EMS suppliers should adopt the wording used by the council rather than their own terms to ensure the software is more user friendly for staff.

In terms of communications campaigns, Swindon emphasised that simplicity of the requirements is key, with a universal set of requirements across LAs. Similarly, Watford suggested that messaging had to be straightforward and universal across LAs, and that a long list of ID requirements would be confusing to communicate to electors.

5.2.4. Affordability

National roll out of the poll card model is difficult to estimate from these pilots. The majority of costs incurred for the running of the pilots were for the purchase and/or hire of IT equipment (both software and hardware) required alongside the poll cards. The costs of hiring additional staff members and training them to use the new equipment also made up a significant proportion of total costs. The production and issuance of scannable poll cards was also a significant proportion of total costs.

The cost of IT equipment - specifically, the cost of software licenses, hiring devices and other equipment - varied significantly between Watford and Swindon. Taken on a per-polling station basis, the average cost in Watford was £332, and in Swindon £659. It should be noted that there was no additional software license cost for Watford. Both LAs chose to hire their equipment for the pilot.

We have not made an attempt to estimate the cost of IT equipment if it were required for a UKPGE. The predominant reason for this is the lack of evidence and certainty in producing such an estimate. While both Watford and Swindon chose to hire their equipment, it is plausible that Local Authorities would choose to invest in purchasing the relevant IT equipment. Furthermore, it is also possible that Local Authorities would face lower rental prices as suppliers benefit from economies of scale. In either case, we cannot predict with

certainty the likely market suppliers' pricing structures based on the limited evidence from the pilot.

Staff costs, which include both polling station staff costs and administrative staff, are expected to range from £0.7m to £8.9m. Swindon reported that around 515 extra administrative hours were required for its 42 polling stations, equating to approximately 5 hours additional administrative staff resource per polling station. Watford did not report any additional administrative resource, reflecting that the amount of additional resource required is dependent on factors pertaining to each authority. As such, we have varied this assumption, assuming that authorities require no additional administrative resource per polling station in the low estimate and 10 hours in the high estimate, double what Swindon required.

Both Swindon and Watford required polling station inspectors (PSIs) to help assist the Presiding Officers (POs) and other polling station staff to identify and solve any problems arising. In Swindon, 10 additional PSIs were required for its 102 polling stations, and in Watford, 2 were required for its 48 polling stations. This equates to approximately 0.1 PSI per polling station for Swindon, and 0.04 for Watford. Our expectation is that, on average, an additional 0.1 PSIs will be required. To account for uncertainty, we have ranged this assumption from a low of 0.04, in line with Watford, up to 0.16.

Additionally, based on reports from Swindon that 6 pilot supervisors were required for its 42 polling stations, we have assumed that there are 0.06 pilot supervisors for each polling station. Again, it is plausible that authorities may require a greater or lesser number of additional staff dependent on their circumstances, so we have included a range of 0.02 to 0.1.

Training costs are expected to range from £2.1m to £3.4m. Using feedback from Swindon and Watford, we have assumed that all polling station staff receive 1 hour 15 minutes training, which, based on detailed wage data collected by Cabinet Office, will cost £20. We have varied the amount of time taken to deliver this training to include a low estimate of 1 hour and a high estimate of 1 and a half hours, reflecting different approaches to training staff between authorities.

Under this model, scannable poll cards were issued to all electors who had not opted for a postal vote. As of the 2017 General Election, 82% of electors had not opted for a postal vote, and would therefore require a scannable poll card. As such, this is the minimum benchmark of required scannable poll cards. Our central expectation is a conservative one: 90% of voters may require a poll card - reflecting the possibility that those registered for postal votes may opt-in for a scannable poll card in the run up to a UKPGE.

To account for a scenario in which all voters request a scannable poll card, we have also modelled a high scenario. The additional cost of producing scannable poll cards, relative to existing poll cards, is approximately £0.03, with an additional £0.05 for delivery²¹. Both of these have been based on reports from Swindon, and adjusted for relative price differences across the country based on extensive ERO cost data held by the Cabinet Office. The total cost of issuing scannable poll cards is therefore estimated to range from £1.5m to £5.6m.

²¹ The additional cost for delivery of scannable poll cards is borne out of the requirement that deliverers recorded additional information, and that cancelled poll cards were re-delivered.

5.3. Mixed ID Model

The mixed ID requirement was piloted by Bromley and Gosport.

Key Findings

Integrity

Bromley and Gosport showed mixed results in terms of elector's attitudes after election day.

- **Confidence in knowing how to vote:** did not change post election day in either Bromley (97%) or Gosport (94%)
- **Satisfaction with the voting process:** significantly increased post election day in Gosport (80% to 85%) but did not change in Bromley (84%)
- **Sufficient safeguards to prevent electoral fraud:** significantly increased post election day in both Bromley (50% to 62%) and Gosport (35% to 41%)
- **Belief that polling stations are safe from fraud and abuse:** significantly increased post election day in Gosport (81% to 86%) but did not change in Bromley (89%)
- **Perception that photographic ID would stop electoral fraud:** significantly increased post election day in Bromley (61% to 71%) but did not change in Gosport (58%)
- **Perception that non-photographic ID would stop electoral fraud:** significantly decreased post election day in Gosport (41% to 33%) but did not change in Bromley (51%)
- **Perception of local fraud occurring:** significantly decreased post election day in both Bromley (13% to 8%) and Gosport (12% to 7%)
- **Perception of fraud in GB occurring:** significantly increased post election day in Bromley (21% to 26%) but did not change in Gosport (31%)

Democracy and Equality

Awareness of the requirement in the mixed ID model was in line with other models.

- **The number of people who did not return to vote:** across both was 208 (0.25% of people checked). In Bromley 154 people did not return (0.22% of people checked) and in Gosport 54 people did not return (0.37% of people checked)
- **Awareness of the ID requirements:** 80% in Bromley and 77% in Gosport among eligible electors post election day, with those aged 18-34 were less likely to be aware in Bromley (68%) and Gosport (67%)
- **Most cited channel for finding out about the ID requirement:** the poll card in both Bromley (63%) and Gosport (55%), with direct channels having a greater impact than indirect resources
- **Reason for not voting among those who reported they did not vote:** 'Too busy/other commitments' was the most popular reason in Bromley (40%)

Delivery

Polling station staff were generally confident in the delivery of the mixed ID model on polling day but had the greatest issues with the data capture form due to long list of ID.

- **Most popular ID type used:** driving licence in both Bromley (52%) and Gosport (54%)
- **Polling station staff confidence in delivering the requirements:** was 99% in both Bromley and Gosport

Affordability

The mixed ID model is expected to cost between £4.6m and £17.1m per UKPGE.

5.3.1. Integrity

Perceptions of the voting process

Piloting the mixed ID approach had no significant impact on eligible electors confidence in how to go about casting their vote in either Bromley or Gosport, with the overall level of confidence in how to go about casting a vote remaining high post pilot (97% and 94% confident respectively). Those from lower socio-economic groups, SEG DE, showed less confidence than the general sample in both Bromley (96%) and Gosport (92%). This is independent of the ID requirements as confidence was in line with pre election day levels in both Bromley (93%) and Gosport (90%).

The public opinion survey results highlighted a difference in levels of satisfaction with the voting process between the two pilot sites.

In Bromley there was no significant impact on the level of satisfaction towards the process of voting following election day. The overall level of satisfaction post pilot remained high (84%), and six percentage points higher than the comparator group (78%, Bexley). This significant difference versus the comparator, but not against the pre pilot results, suggests that voters were already more likely to be satisfied with the voting process before the main voter ID communications campaign took place. In contrast, eligible electors in Gosport were significantly more satisfied with the voting process following election day. They saw an increase in satisfaction from 80% to 85%, and also a significant difference to the comparator site (77%).

Having administered the pilots, 79% of polling station staff in both Bromley and Gosport agreed that that voting was more secure because voters had to prove their identity, and over 9 in 10 in each site reported no incidences where they felt people were asking to vote whose identity they were unsure about.

Perceptions of electoral fraud

There have been no historical electoral fraud allegations in either Bromley or Gosport. There have also been no allegations made for the 2018 Local Elections, in either area, at the time of this publication.

Significantly more eligible electors agreed that there were sufficient safeguards in place to prevent electoral fraud in polling stations in both pilot areas after election day: this increased by six percentage points in Gosport (35% to 41%) and 12 percentage points in Bromley (50% to 62%).

Post election day, significantly more eligible electors felt that voting in polling stations was safe from fraud or abuse in Gosport (81% to 86%). In comparison, in Bromley, 9 in 10 eligible electors agreed that voting was very or fairly safe from fraud or abuse, and there was no significant change post election day (89%).

Post election day, a significantly lower proportion of eligible electors in both sites felt that electoral fraud was very common in the area they lived (8% in Bromley and 7% in Gosport, with a decrease of five percentage points in each pilot). In Bromley there was no change in level of agreement that it would be easy to get away with electoral fraud in Great Britain, and a higher proportion agreed post election that electoral fraud is a problem in Great Britain (21% to 26%).

In Gosport, a lower proportion of eligible electors felt that it would be easy to get away with electoral fraud in Great Britain (40% to 33%) and there was no change in the perception that electoral fraud is a problem in Great Britain (31% post pilot).

Showing photographic ID appears to be, from an eligible elector's perspective, a more effective form of ID to use in order to stop electoral fraud. In both sites, significantly more eligible electors agreed that showing photographic ID would stop electoral fraud in polling stations after the election.

Responses from the polling station staff survey results also show that 99% of staff in Bromley, and 100% of staff in Gosport, reported that at no point during election day did they feel there were suspected cases of electoral fraud.

5.3.2. Democracy and Equality

Awareness of the pilot

Awareness of the ID requirements were in line with levels in other pilot sites. The majority of eligible electors were aware of the new requirements to bring either one form of photographic ID or two non-photographic IDs in both Bromley (80%) and Gosport (77%). Polling station staff reported being very confident or somewhat confident that voters were aware they would be required to present ID before being issued their ballot paper (97% in Bromley and 96% in Gosport), with the majority feeling very confident (66% in Bromley and 60% in Gosport).

Finding out about the pilot through their poll card was the most common channel cited in both Bromley (63%) and Gosport (55%). Local communications campaigns were more effective raising awareness among electors than the wider national media channels; 44% of eligible electors who took part in the public opinion survey recalled receiving a leaflet from Bromley, and so did 48% of people in Gosport. Hearing about the pilot through local media was recalled slightly more often than through national media (28% in Bromley and 26% in Gosport), and 27% of people in Gosport recalled finding out about the pilot on a poster from Gosport Council. In Gosport, 16% of electors recalled finding out about the pilot through national media, while this figure was higher in Bromley (27%).

Intention to vote

The additional ID requirements did not have an impact on most elector's reported intention to vote. Those who reported not voting in the 2018 local elections cited a variety of reasons for not voting (Annex G). As in other authorities 'too busy/other commitments' was the most cited reason why they did not vote in the commissioned survey (40% in Bromley and 30% in Gosport).

On election day, 99% of polling station staff in Bromley and Gosport agreed that the majority of voters were able to provide a correct form of ID. The requirement did not seem to impact actual turnout. Official turnout figures for the 2018 local election was 39.95% in Bromley (down 0.88 percentage points from the 2014 election²²) and 33.29% in Gosport (up 1.31 percentage points from the 2014 elections²³).

²² Most recent comparative Local Election to the 2018 Bromley Local Election

²³ Ibid.

In total the number of people who did not return to vote across the two pilots was 208 or 0.25% of people checked. In Bromley 154 people did not return to vote (0.22% of people checked), and in Gosport this was 54 (0.37% of people checked).

A driving licence was the most common form of ID used across the two pilot areas (52% in Bromley and 54% in Gosport). The second most common form of ID used was a passport (23% in Bromley and 21% in Gosport). There was little variation in the types of IDs people chose to bring to the polling station, even with the extensive list seen in Gosport. Neither Bromley or Gosport provided any elector with a certificate of identity or electoral identity letter (council issued ID).

5.3.3. Delivery

Planning and resourcing

In both Bromley and Gosport, 99% of polling station staff agreed that they had successfully delivered the ID requirements in their own polling stations.

In qualitative interviews with electoral services teams, both sites noted their interest from an early stage to participate in the pilot schemes. In particular, Gosport recognised that the pilots provided an opportunity for them to take part in wider discussion on ID requirements at polling stations, and to ensure their views were taken into account in the trial stages of the policy. Both LAs felt it was important to ensure the list of IDs made available to electors for use on election day was inclusive of all their residents. For example, Gosport noted the high number of military personnel present in their local area, and how this specific knowledge about demographic in their area influenced their choice of ID types to pilot.

Bromley felt they had enough time and resource to implement the policy requirements, even with a change in council leader midway through the process. Gosport mirrored this view, and felt that if they were to run the pilot ID requirements again they would be able to reduce some of the time and resources allocated in the 2018 election, given they now had templates and experience from the pilots. For Gosport, it was important to pilot the new requirements in a non UKPGE year, where turnout would be expected to be lower, to ensure that any issues were highlighted in this context first.

The majority of polling station staff (97% Bromley and 94% in Gosport) agreed that they felt they had everything they needed on election day to deliver the pilots, both in terms of space and equipment.

In terms of planning, Bromley recognised from an early stage the need to take on additional polling station staff, although they noted they would reduce this number in future, and the need for commissioning additional requirements from their suppliers, especially in regards to printing.

Gosport considered the Electoral Commission's guidance when planning for the number of staff they would have at each polling station on the day of polling, whereas in previous years they had used historical turnout figures for local elections. They also highlighted the need to have a private area away from the main polling station space, and mirrors²⁴ for elector use.

²⁴ Government issued guidance recommended that following the removal of headwear, the elector must be given the opportunity to use a mirror, and to have privacy and time to put the covering back on.

There was a general consensus that there was no need to consider different buildings to the sites historically used as polling stations in order to accommodate the ID requirements.

Gosport were disappointed the final printed register that was used on election day was not aligned with their expectations. The printed register was particularly difficult to use for data entry, more so in Gosport as it had to accommodate a longer list of IDs. This had an impact on the experiences of polling station staff, and would ideally be rectified if the pilot requirements were considered again, as Gosport intend on keeping the the list of IDs relatively broad.

Both Bromley and Gosport informed their local police forces of their desire to pilot the ID requirements early on in the process, and were supported throughout by them. Bromley noted that the local police advised them on the communication channels they had planned to use. Gosport also noted the positive impact the local police had, in an advisory capacity, on the planning of the pilots, and they were able to integrate this into their usual planning for the elections. In Gosport specifically, the police did raise the need to plan for people who might attend the polling station to try and disrupt the ID checking process on the day, although they noted that this did not materialise on the day itself.

Training

Bromley and Gosport approached training for polling station staff differently. Bromley, ahead of their training sessions, let staff know about their intention to pilot the ID requirements in a letter. They also updated the guidance set out in the Electoral Commission's handbook they provided to polling station staff. It was noted that the Electoral Commission should take the lead on updating this guidance if the ID requirements were taken forward in future elections, as opposed to the LAs themselves.

Bromley noted that holding a “live” session where staff could have feedback and interacted with the training facilitators would have been beneficial, but the logistics of this would have been difficult at the time. Bromley felt their training was well received given they had no negative feedback from staff. They did note that a handful of staff, before the training had taken place, had already decided to not take part as they felt the new ID requirements would be too difficult to administer.

Gosport expanded their existing face-to-face training to include the new ID requirements. It was noted that there was significant preparation involved in creating the materials beforehand, but the specific delivery of the training was not particularly arduous. They also updated the handbook provided to each poll clerk with additional guidance. Polling station staff aired some concerns about the additional questions electors might have because of the new circumstances, but these concerns were addressed in the training Gosport provided. It was noted that after training staff were less worried about the process.

Working with delivery partners

Following the pilots, electoral services teams in both Bromley and Gosport felt there were clear roles that Cabinet Office, EMS suppliers, and the Electoral Commission could play. Gosport noted that the Electoral Commission should maintain overall oversight of the ID requirements whilst the Cabinet Office support LAs.

Gosport noted the need for templates to help with the delivery, and for the Cabinet Office to consider the number of data points requested as part of the ID pilot evaluations. It was felt that at times the requests put additional strain on polling station staff resources. Bromley also suggested more support was needed to capture the data, but did not specify where this support should come from. Bromley also noted that they would reduce the list of ID in future to aid with delivery of the requirements.

Bromley also noted the positives of meeting with other LAs who were piloting the ID requirements, as they offered an opportunity to share learnings and understand where each other was along the process.

5.3.4. Affordability

National roll out of the mixed ID model is expected to range in cost from £4.6m to £17.1m. As shown, the costs are driven primarily by hiring additional polling station staff, administrative support, and training those staff on the new responsibilities of checking ID.

The estimated cost of hiring additional polling station and administrative staff is between £2.9m and £5.8m, constituting 39% of the total in the central estimate. We expect that authorities will require one additional poll clerk (PC) at each polling station, based on information that Bromley required an additional 185 PCs for its 185 polling stations, and Gosport an additional 42 for its 48 polling stations. We therefore expect that 1 additional PC will be required per polling station, but acknowledge that some polling stations may be adequately staffed, and others may even require a second PC. As such, we have accounted for a variation between 0.8 and 1.2 PCs per polling station.

We have also assumed that the additional administrative support required by authorities will range from twelve minutes to around two and a half hours per polling station. This wide range is a consequence of the difference in quantity of extra resource required in the two pilot authorities. Bromley required 296 hours of additional administrative resource, whilst Gosport required just eight hours. This is likely a result of the considerably smaller size of Gosport compared to Bromley.

Both Bromley and Gosport hired an additional two PSIs, despite having significantly different numbers of polling stations (185 and 48 respectively), reflecting the difference in approach taken by the two authorities. This means that the effective number of additional polling station inspectors required at each polling station was 0.01 and 0.04. We have used these guidelines as our low and high estimate, and used the midpoint between them as our central estimate.

The estimated cost of training new and existing staff ranges from £1.7m to £3.8m, which constitutes 24% of total costs in the central estimate. This is based on the expectation that training existing staff will take approximately 30 minutes more than the current training of 2 hours. For new staff hired as a result of the new requirements, we have included training costs of two and a half hours, as the training required under normal circumstances is considered additional. Time taken to train staff depends on their level of experience, which varies between LAs and election years. To account for this, we have varied our assumptions to include both a low and high estimate, which assume that the additional training varies from 15 minutes to 45 minutes.

The estimated cost of issuing ID ranges from £0 to £4.9m, constituting 22% of costs in the central estimate. In Bromley and Gosport, there were no requests for council ID, and therefore, no costs were incurred. However, given that this is based on a local election, it may not accurately reflect a UKPGE. As such, we have assumed that 0.03% of the electorate would request council ID, with a low estimate reflective of the piloting authorities experience (i.e. no ID ordered), and a high estimate of 0.06%. The costs of producing council ID consist of the staff time taken to deal with the process, (electoral staff member checking application, producing certificate, marking internal records and handing to elector) estimated at around half an hour, and the cost of printing, which we have based on detailed data from EROs across the country at £0.11. This ultimately results in a unit cost of £8.08 per issued council ID - considerably more expensive than the poll card and mixed ID models - due to the labour-intensive production process.

5.4. Photographic ID Model

The photographic ID requirement was piloted by Woking only.

Key Findings
<p><u>Integrity</u> <i>Woking was the only pilot site which showed consistent positive movement on electors' attitudes towards the Integrity measures after election day.</i></p> <ul style="list-style-type: none">• Confidence in knowing how to vote: significantly increased post election day (92% to 96%)• Satisfaction with the voting process: significantly increased post election day (82% to 90%)• Sufficient safeguards to prevent electoral fraud: significantly increased post election day (30% to 58%)• Belief that polling stations are safe from fraud and abuse: significantly increased post election day (72% to 80%)• Perception that photographic ID would stop electoral fraud: significantly increased post election day (63% to 69%)• Perception of local fraud occurring: significantly decreased post election day (21% to 16%)• Perception of fraud in GB occurring: significantly increased post election day (29% to 42%) <p><u>Democracy and Equality</u> <i>Awareness of the requirement in the photographic ID model was in line with other models.</i></p> <ul style="list-style-type: none">• The number of people who did not return to vote: 51 (0.27% of people checked)• Awareness of the ID requirements: 72% among eligible electors post election day• Most cited channel for finding out about the ID requirement: a home delivered leaflet from Woking Borough Council (47%), with direct channels having a greater impact than indirect resources• Reason for not voting among those who reported they did not vote: 'Too busy/other commitments' was the most cited reason (32%) <p><u>Delivery</u> <i>Polling station staff were generally confident in the delivery of the photographic ID model on polling day but had some issues with the data capture form.</i></p> <ul style="list-style-type: none">• Most popular ID type used: driving licence (60%)• Polling station staff confidence in delivering the requirements: was 99% <p><u>Affordability</u> <i>The photographic ID model is expected to cost between £5.9m and £17.9m per UKPGE.</i></p>

5.4.1. Integrity

Perceptions of the voting process

There was a significant change in elector confidence in knowing how to cast their vote in Woking, with post election day confidence levels rising by four percentage points post election day (92% to 96%). This was also four percentage points higher than the England control group. Those significantly less likely to be confident were from a lower

socio-economic background, SEG C2 (86%). This is independent of the ID requirements as confidence was in line with pre election day levels (93%). In addition, satisfaction with the process of voting increased significantly post election day (82% to 90%). This was eight percentage points higher than the England control group which suggests that overall, taking part in the photographic ID model had a positive impact on perceptions of the voting process.

Perceptions of electoral fraud

There have been a small proportion of historical electoral fraud allegations in Woking (Annex B). There have been no allegations made for the 2018 Local Elections at the time of this publication.

Following the election, there was a significant rise in the level of agreement that sufficient safeguards are in place to prevent electoral fraud in polling stations, from 30% pre election to 58% post election. This was also 14 percentage points higher than the England control group. Similarly, eight in 10 people agreed that voting in polling stations was very or fairly safe from fraud or abuse, eight percentage points higher post election day (72% to 80%).

There was also a significant change in perceptions towards electoral fraud post election day. The belief that electoral fraud is common in Woking had significantly decreased by five percentage points post polling day (16% to 11%). The belief that electoral fraud is common locally was also significantly higher in the comparator LA (Richmond) by eight percentage points, and the England control group by 10 percentage points.

The view that electoral fraud is a problem in Great Britain significantly increased by 13 percentage points (29% to 42%). This was also significantly higher than the comparator LA and England control group by 10 and 23 percentage points respectively. Yet, levels of agreement that it would be easy to get away with electoral fraud in polling stations in Great Britain pre and post election remained at 43%.

The public opinion survey results highlight that there was a significant increase in agreement that requiring people to show photographic ID would prevent fraud in polling stations (63% to 69%).

Having administered the pilots, 77% of polling station staff in Woking agreed that voting was more secure because voters had to prove their identity, and over 9 in 10 reported no incidences where they felt people were asking to vote whose identity they were unsure about (92%).

5.4.2. Democracy and Equality

Awareness of the pilot

Awareness among all eligible voters, of the requirement to show ID in polling stations in the May local elections, was 72% following election day. Only Watford reported a lower awareness of the ID requirements (58%) but awareness in Woking was broadly in line with the other pilot sites. Polling station staff reported being confident that voters were aware they would be required to present ID before being issued their ballot paper (99%), with the majority feeling very confident (74%).

Almost half of eligible electors recalled finding out about the pilot through a leaflet sent to them by Woking Borough Council (47%), with poll cards being the second most recalled source (44%). This suggests that direct communications were more effective in Woking than indirect sources. National media was recalled more than local media (22% and 17% respectively), and just over 1 in 10 found out about the pilot from posters displayed by Woking Borough Council (14%).

Intention to vote

Official Woking turnout figures for the 2018 local election was 37.75%, down by 0.83 percentage points in comparison to 2016 local elections.

In the public opinion survey those who reported not voting in the 2018 local elections cited 'too busy/other commitments' as the main reason (32%) for not voting (Annex G).

On election day, 100% of polling station staff in Woking agreed that the majority of voters were able to provide a correct form of ID.

In total, the number of people who did not return to vote in Woking was 51 (0.27% of people checked), comparatively the second highest figure across the pilots. The most common ID requirement used was a driving licence, used in six out of 10 cases (60%). The second most common ID type was a passport (25%), and the third was a Surrey Senior Card (12%). Woking used local elector cards as their council issued ID and received 64 applications, of which 63 cards were issued as one application was made by a postal voter.

5.4.3. Delivery

Planning and resourcing

In Woking, 99% of polling station staff agreed or strongly agreed that they had successfully delivered the ID requirements in their polling stations.

In qualitative interviews, the electoral services team highlighted they participated in the pilots to trial the Northern Ireland approach, with a focus on photographic ID. They kept their list of acceptable IDs short to make the process straightforward, and as a result found the data capture process easier than authorities trialing the mixed model.

Woking opted to use local elector cards as their council issued ID, and these were issued free of charge to electors who did not have the specified documents on the ID list. Woking undertook 'roadshows', where they took photographs of electors and allowed them to upload photos from smartphones, in order to apply for a local elector card. Local elector cards were issued to ten people who were homeless, and one transgender person. Homeless electors were also able to use the cards to register at the local job centre.

The electoral service team in Woking planned for additional resourcing to ensure they could deliver the standard election process as well as pilot specific tasks, such as creating the local elector cards. On average, the turnaround time to produce a local elector card took one day from the application. And the majority of polling station staff in Woking agreed they had everything they needed on election day to deliver the pilots in terms of space and equipment (99%).

Woking noted that they ideally would have liked approximately six months planning time to integrate the extra requirements and clarity in terms of responsibilities and overarching objectives.

Training

Training was mandatory for all polling station staff and was delivered in two sessions on the same day. The electoral services team also included a briefing session on the Monday before election day as a refresher exercise. Woking felt that the training went well, and measured understanding of the process through a group exercise. Staff needed initial reassurance about concerns over using their discretion to accept or reject ID, and were able to call the council office for extra support when rejecting IDs on the day. Another worry that staff cited was unfamiliarity with some of the photographic documents, such as Spanish ID cards.

Working with delivery partners

Woking were extremely positive about the delivery of the pilots and the list of ID requirements they used. They suggested that additional administrative support put in place was to ensure that as a pilot they had all the resources required, with one extra member of staff in the planning team being used to support additional workloads. Polling station staff levels were likely to be reduced back to pre-pilot levels although it was noted that polling station staff felt that the process was a lot easier to manage with the additional staff.

Qualitatively, Woking noted that despite some feedback that some less commonly held IDs were not permissible they felt that increasing the list of accepted IDs was not justifiable, as it would be at the expense of delivering a simple set of requirement for electors to follow. Overall, they felt that they received a lower number of complaints on the day, and subsequent days after polling day, than usual. They did not feel that any groups were impacted, and they worked hard to consider this through working with outreach groups to ensure eligible electors were aware of the requirements.

Woking noted that overseas electors would have to be considered in future awareness campaigns. They acknowledged that although the registers were much bigger (in terms of number of sheets), this was the best format to collate the data (as opposed to having a separate data collection form). They raised that Cabinet Office would be able to provide a more defined role in delivering one set of requirements, but they emphasised that each LA would have different demographics, and the final list of accepted IDs would have to take this into account.

5.4.4. Affordability

The photographic ID model is expected to range in cost from £5.9 to £17.9m, which is marginally more expensive than the mixed ID model. The main drivers of costs were additional staff costs, especially additional administrative staff costs, training costs, facilities costs and the cost of producing and issuing local elector cards.

The estimated cost of hiring additional staff ranges from £3.7m to £9.9m, which comprises 59% of the total cost in the central estimate. The main driver of staff costs is additional

administrative staff, of which we have assumed that authorities will require an additional 13.95 hours per polling station. This is based on information from Woking that an extra 600 hours of administrative resource was required to support the process and issue local elector cards across its 43 polling stations.

We expect that authorities will require 0.14 PCs per polling station, which is based on the fact that Woking needed 6 additional PCs for its 42 polling stations. The mixed ID model has an inclusive list of acceptable IDs, resulting in less scope for elector confusion. As such, fewer PCs were required to be on hand to deal with issues and queries. The precise staff requirement may potentially vary between LAs, and as such, we have varied this assumption to include a low estimate of 0.08 and high estimate of 0.2 PCs per polling station.

The estimated cost of training new and existing staff ranges from £1.2m to £2.6m, which constitutes 17% of the total cost in the central estimate. This cost is based on the assumption that training POs and PCs on the new responsibilities arising from ID requirements will take approximately one hour 15 minutes and 40 minutes respectively. We have assumed implicitly that it will take a further two hours to train new staff, as the standard election training would be an additional cost. As above, time taken to train staff is dependent on authority-specific factors such as experience of staff and the overall approach taken by the RO. To account for these factors, we have varied the additional time spent on training required for POs and PCs. The low and high estimate for POs is 1 hour and 1 hour and a half respectively. The low and high estimate for PCs is 30 minutes and 50 minutes respectively.

Additional facilities for the pilot are expected to range from £0m to £2.5m, constituting 15% of the total cost in the central estimate. This is based on the assumption that authorities will require approximately one privacy screen and one mirror per polling station, based on information provided by Woking. Some authorities will already have this equipment and capacity to allow voters to vote in private, and so will not require as many or any additional facilities. Conversely, others will be under-equipped and will require more. To account for this uncertainty, we have varied these assumptions to include low and high estimates assuming that authorities either need no additional facilities at all, or that they require an additional one privacy screen and mirror at each polling station.

The estimated costs of issuing the local elector cards ranges from £0.9m to £3m, accounting for 10% of the total costs in the central estimate. This cost is dependent on the percentage of the electorate that will require a local elector card. Woking reported that 0.08% of the electorate needed a local elector card. Given that turnout is generally lower at local elections, we use this as our low estimate, and 0.2% for our high estimate to account for a scenario in which more electors than expected require an elector card. Total costs are also based on the production and postage costs per local elector card, which are based on information provided by Woking.

5.5. Postal Vote Pilots

The postal vote pilot was undertaken by Peterborough, Slough, and Tower Hamlets. Peterborough additionally trialled a photographic ID requirement at polling stations for proxy voters.

Key Findings
<p><u>Integrity</u></p> <p><i>Perceptions of local fraud being prevalent through postal voting was higher in Tower Hamlets but was not the majority view in all three pilot sites.</i></p> <ul style="list-style-type: none">● Perception of local fraud occurring through postal voting: 16% of registered postal voters surveyed in Peterborough, 14% of registered postal voters surveyed in Slough and 31% of registered postal voters surveyed in Tower Hamlets agreed.
<p><u>Democracy and Equality</u></p> <p><i>Awareness and messaging of the postal voting leaflet was widely understood across all pilot sites with electoral service teams noting they would consider sending the leaflet again.</i></p> <ul style="list-style-type: none">● The number of proxy voters who did not return to vote in Peterborough was 1 (0.76% of people checked).● Incidents of ballot paper refusal in postal voters: there were no incidents in all three pilot sites.● Message of the postal voting leaflet: ‘Your vote is yours alone’ was noted as the main message across all three sites the majority of the time.● Rating of the postal voting leaflet: positively rated in terms of language used, layout, clarity of message and ease of understanding across all three sites
<p><u>Delivery</u></p> <p><i>All three piloting authorities felt they had delivered the requirements successfully.</i></p> <ul style="list-style-type: none">● Additional training: carried out across all three pilot sites for staff who would be carrying out the additional checks in a face-to-face format, received positively by staff.● Staff selection: was targeted at staff who were already experienced in interacting with electors/customers through call centre/canvass work in all three pilot sites.
<p><u>Affordability</u></p> <p><i>The total costs of the postal vote pilots were made up of the cost of hiring additional staff, producing and distributing anti-fraud leaflets, and the cost of any additional facilities.</i></p> <ul style="list-style-type: none">● Peterborough: Over 90% of total cost in Peterborough was accounted for by the cost of hiring additional staff.● Slough: Over 90% of total cost in Slough was accounted for by the cost of hiring additional staff.● Tower Hamlets: The cost of hiring additional staff; producing and distributing anti-fraud leaflets; and additional facilities each accounted for approximately one third of the total cost in Tower Hamlets.

5.5.1. Peterborough

5.5.1.1. Integrity

Perceptions of electoral fraud in postal voting

In Peterborough there were no incidents where an elector was refused their ballot paper. A total of 6,040 postal votes were delivered to electors, 3,224 of which were delivered by hand. Of the total postal votes, 3,412 people were contacted within 10 days of their ballot paper

being delivered to them. At this checkpoint 41 people confirmed, when contacted, they had not applied to vote by post, and three people confirmed they had not received their postal ballot paper at this point. At the second checkpoint, no less than three days before polling, 575 people were contacted. And at this checkpoint there were no cases in which people confirmed they had not applied for their postal vote or that they had not received their postal ballot paper. There were no cases in which people confirmed they had not returned their postal ballot paper and postal voting statement and where these documents had been returned to the Returning Officer. There were also no incidences where people were referred to the police relating to postal voting fraud.

In Peterborough 95% of registered postal voters who took part in the commissioned survey felt confident in knowing how to go about casting their vote at an election, and 86% noted they were satisfied with the electoral process during elections. Most electors remained unsure about electoral fraud being a problem in postal voting for Peterborough (62% unsure). Sixteen percent agreed that postal voting fraud is a problem, and 18% agree that it is a problem elsewhere in the UK (69% don't know).

The level of agreement that voting through a postal vote is safe is indicatively higher in Peterborough than the other pilot locations (not significantly), although only a minority agree that there are sufficient safeguards in place to prevent electoral fraud through postal voting (36%). This is reflected by an appetite for stronger identity checks for postal voting to ensure electoral fraud is prevented, with over half agreeing with this sentiment (63%).

Planning and resourcing

Having delivered the pilot Peterborough remained unconvinced that the new process was more secure. They noted that their staff felt confident in delivering the pilots to their best of their ability. However, they pointed out that improved communication between delivery partners would be important when planning the proportion of postal votes they had planned to check.

Qualitatively, Peterborough staff noted they felt there were fewer mismatches (the wrong ballot paper in the wrong envelope) than in previous years, which they attributed to the fact they processed these in-house. They also noted that for specific areas where face-to-face checks were completed, the levels of rejection were on par with previous years. On the whole they reported no cases in which the additional process was questioned, although electors did have some questions, and that translating the leaflets into multiple languages helped increase the level of understanding amongst their electorate.

When planning the pilot, they decided to carry out face-to-face checks as opposed to telephone, as they felt they didn't have enough telephone numbers to ensure the pilot would be delivered effectively. They also felt the face-to-face checks would provide a more visual step for the electorate towards the prevention of fraud.

5.5.1.2. Democracy & Equality

Evaluating the postal voting leaflet

Approximately eight in 10 (76%) postal voters surveyed recalled receiving a leaflet in their postal pack directly from Peterborough, with those who reported themselves as voting being

more likely to recall the leaflet. The majority of those surveyed agreed that the layout, the language used within the leaflet, and the clarity of the message was very good or good (87%, 91%, and 88% respectively). Nine in 10 (89%) noted they were able to understand the leaflet, and significantly more postal voters noted the leaflet had very good or good clear formatting and layout in comparison to Tower Hamlets or Slough. A minority also highlighted that the fact the leaflet was available in multiple languages was a good thing (5%).

The message 'Your vote is yours alone' was noted as the key message by 51% of those who responded to the commissioned survey. 'Your vote matters, don't lose it' (18%) and 'You should report suspicions of electoral fraud' (14%) were also highlighted as key messages, albeit to a lesser extent.

Qualitatively, the electoral service team felt their electorate were already used to contacting their council or police if they were concerned about electoral fraud. The commissioned survey reported that having read the leaflet, the majority (91%) would report electoral fraud; 48% noting they would report the fraud to their local council, and 41% to the RO. Significantly fewer noted they would report incidences of electoral fraud to the police, Electoral Commission, or to Crimestoppers than other pilot sites (32%, 16%, and 11% respectively)²⁵.

5.5.1.3. Delivery

Postal voting

The Peterborough electoral service team noted they would have liked to receive the finalised pilot order earlier in the process, to avoid making the subsequent deadlines feel rushed. They involved their local police force from an early stage, who helped hold talks with Royal Mail staff on best practices when carrying out the pilot instructions.

When planning, Peterborough recognised they would need additional resources in order to visit all the wards they felt necessary. They invited staff who would be carrying out the pilot to a face-to-face training session. The team noted the value in enlisting housing officers and parking enforcement officers, who were already familiar with completing door-to-door activities for the council.

Proxy voting

In total, one person was not issued their proxy voting ballot out of 132 people (or 0.76% of people checked). Qualitatively, Peterborough noted that given the steady rise in the relative number of proxy voter applications, they saw an opportunity to evaluate a form of ID requirement at the same time as the postal pilot. There was also an element of wanting to pilot ID requirements on a smaller scale, and they noted the importance they felt in keeping a broad list of IDs available to proxy voters to provide identification. As with the postal pilots, communication of the ID requirements occurred across many different channels, and the electoral service team reached out to a number of community leaders to ensure proxy voters were made aware. Training was carried out at the same time as the postal training. Overall,

²⁵Overall the communications campaign 'Your Vote is Yours Alone' generated 15 pieces of information that were reported to Crimestoppers during the campaign.

the electoral service team could not provide any negative feedback on the proxy pilot itself and would be receptive to the idea of piloting again.

5.5.1.4. Affordability

Postal voting

The postal vote model in Peterborough is estimated to have cost approximately £0.06m, or £2.93 per registered postal voter. This cost refers exclusively to the postal vote pilot; it excludes any costs associated with both the postal vote and the proxy vote pilot such as RO costs and legal counsel on the pilot Order. Rather, it includes only the costs of hiring additional staff, producing and distributing anti-fraud leaflets and any facilities costs such as stationery and printing costs.

The main driver of costs is staff cost, which includes the hiring of the visiting officers, postal vote issuing staff, administrative staff and any additional equipment associated with visiting officers, such as ID badges and high-visibility clothing. Production and distribution of anti-fraud leaflets and additional facilities are estimated to account for under 10% of total costs.

Proxy voting

As shown, the proxy voting model in Peterborough is estimated to have cost approximately £12k, or £90.07 per registered proxy voter. This cost refers exclusively to the proxy voter pilot and therefore, as above, excludes any costs associated with both the proxy vote pilot and the postal vote pilot. Rather, it includes only the costs of hiring additional staff and any additional facilities required such as CCTV, mirrors for polling stations and police support. Additional facilities account for approximately 75% of the estimated total costs and the cost of hiring additional staff account for the remainder.

5.5.2. Slough

5.5.2.1. Integrity

Perceptions of electoral fraud in postal voting

In Slough, 600 people were contacted from a random selection of postal voters, 374 of which provided information upon request. There were zero incidents in which a person, when contacted, confirmed they had not applied to vote by post, and there were no cases in which a person was referred to the police in relation to postal voting fraud.

No elector was refused a ballot postal paper as a result of the additional requirements, although 11 people did confirm they had not received their postal ballot paper at the time of being contacted.

In Slough the level of confidence in how to go about casting a vote in an election was high (93%) among those surveyed. Electors were also satisfied with the process of voting (83%).

As with Peterborough, the majority of those who took part in the public opinion survey were unsure whether or not postal voting electoral fraud is a problem in their local area or elsewhere in the UK (63% and 72%, respectively). This is reflected in the limited agreement that electoral fraud through postal voting could affect an election, with 40% agreeing it would

be easy to get away with postal voting electoral fraud, and 43% agreeing that there could be sufficient electoral fraud to impact an election result. There was limited agreement that there are sufficient safeguards to halt electoral fraud (40%). The majority agreed that stronger identity checks for postal votes would be necessary to prevent electoral fraud (57%).

Planning and resourcing

In the qualitative interviews, the Slough electoral service team reported feeling they had delivered the postal pilots to a high standard, despite being later than other authorities to sign up to delivering the pilots.

They did not receive any negative feedback from electors, but did receive some request for clarification on why they were doing the additional checks at this local election.

Overall the team noted their confidence had not necessarily increased because of the additional processes put in place as a result of the pilot. For instance, they noted their communications are already focussed on messaging around the appropriate completion of your vote. However, they did recognise that it was important to be seen to be addressing electoral fraud, which was a benefit of conducting the pilots.

5.5.2.2. Democracy & Equality

Evaluating the postal voting leaflet

There was high recall (82%) amongst postal voters surveyed of receiving the postal voting leaflet from Slough Borough Council. The majority of people evaluated the leaflet positively in terms of language used, layout, ease of understanding, and clarity of the messages (88%, 84%, 86%, and 87% believing it was very good or good). 'Your vote is yours alone' was highlighted as the main message of the leaflet by just over half of those who took part in the commissioned survey (53%), with the majority agreeing with this sentiment (86%).

Other key messages were pulled out less frequently; 16% noted 'You should report suspicions of electoral fraud' and 10% noted 'There is help available to complete your vote' as the main messages of the leaflet sent to them with their postal vote. The majority agreed they would report electoral fraud in some capacity; 43% to their local council, 41% directly to the police, and 36% to the RO. Crimestoppers and the Electoral Commission were less commonly cited (23% and 18% respectively)²⁶.

5.5.2.3. Delivery

The Slough electoral service team highlighted the central role that the Cabinet Office should take on to ensure consistency in the Pilot Orders between LAs.

As with Peterborough, Slough chose to carry out face-to-face checks as they were not confident they had a sufficient number of telephone contacts. Once the pilot Order had specified that a proportion of applicants should be visited (something they considered important for future postal application checks), based on prior canvass experience they

²⁶ Full evaluation of 'Your Vote is Yours Alone' campaign and Crimestoppers activity is awaiting publication - with breakdown of activity split by location

worked out how many people could be visited in an hour or so, and planned their pilot timing around this.

Slough stressed the need for additional planning time to deliver the requirements. They appointed a pilot canvasser manager who was available to check in with by staff if they experienced a problem on the doorstep. A consultant interim Electoral Services Manager (ESM) also worked on the pilot for two days a week which increased the staff's confidence in delivering the pilot, as they felt supported and knew that there was someone to answer their queries.

Training was conducted through a face-to-face session. They also provided staff with a step-by-step guidance booklet, and pilot Order itself, to help with answering questions they had on an ongoing basis. Staff were selected on the basis that they had prior experience interacting with postal voters, so that they could use this experience during the face-to-face checking stage. They received positive feedback from the staff that attended the training.

5.5.2.4. Affordability

The postal vote model in Slough is estimated to have cost approximately £11k, or £0.84 per registered postal voter. Consistent with the cost evaluation of the postal vote model in both Peterborough and Tower Hamlets, these costs exclude publicity and communication costs. As shown in Figure 6, the main driver of the total cost was of hiring additional staff, which was made up of six additional visiting officers, one senior visiting officer and overtime incurred by an electoral services manager (AEA consultant). The cost of producing and distributing anti-fraud leaflets and canvasser material is estimated to have accounted for less than 10% of the total cost.

5.5.3. Tower Hamlets

5.5.3.1. Integrity

Perceptions of electoral fraud in postal voting

At the first telephone checkpoint Tower Hamlets contacted 2,134 electors, of which 950 answered. Five postal voters confirmed they had not applied for a postal vote - this response was related to electors who already had postal voted but had inadvertently asked for applications again and so were not taken to indicate occurrence of fraud. At the second telephone checkpoint 1,883 electors were contacted, of which 711 confirmed they had received their postal vote ballot, and 693 confirmed they had filled in their postal vote themselves. Possible reasons why a person had not directly recorded their vote themselves related to accessibility issues and requiring help to fill in the form. There were also incidents where a language barrier between the caller and the elector created confusion. There were no incidences where electors were referred to the police or refused a postal ballot.

Postal voters surveyed within Tower Hamlets were confident in the process of voting (95%) and were satisfied overall with the electoral process (82%). Compared to electors in other pilot sites, there were fewer who were unsure that electoral fraud through postal voting is a problem in their local area (54%). A significantly higher proportion of those who took part in the commissioned survey agreed with the sentiment that electoral fraud is a problem in their local area (31%).

The majority of those who responded to the survey agreed that postal voting is safe from fraud and abuse (56%). This is a lower proportion than in other postal voting pilots, which could reflect a wider awareness of historical allegations of fraud in the area.

The majority noted they would report electoral fraud (86%), with 45% noting they would inform the police, 36% the RO, and 29% the local council, or the Electoral Commission. As with other pilot sites, there was agreement that stronger identity checks for postal votes are necessary to prevent electoral fraud (55%), but only a minority agreed there are currently sufficient safeguards in place to prevent this through the current postal voting process (31%).

Planning and resourcing

Overall, the team felt that the pilot was carried out well, but the measures of the pilot did not were more of a reassurance process than a deterrence of electoral fraud. The existing process they had in place for tracking complaints made directly to the police was viewed as more effective than the pilot because it was more efficient than the local council themselves having to pass on complaints. They felt the value of the pilot came with the opportunity to interact with electors directly.

The team also raised concerns that by drawing attention to the pilots in the communication campaigns, it would raise perceptions that more fraud was taking place than in reality. They remained unconvinced that the new requirements would be the most effective way of getting to the root issues they perceived in electoral fraud through postal voting.

Tower Hamlets chose to call individuals during the pilot. It was noted they were often using the same number to contact multiple people in one household. They were also unsure whether a particular group was impacted more or less by the additional requirements, as there was not the opportunity or time to ask specific demographic questions. They received positive feedback from electors in terms of being seen to be doing something to prevent fraudulent behaviour.

Despite concerns over how effective the new process was, the electoral service team noted that if they were to pilot again they would not change the requirements asked of them, but they would work more towards stakeholder engagement; for example, in setting expectations for the relationship between Cabinet Office, Electoral Commission and LA.

5.5.3.2. Democracy & Equality

Evaluating the postal voting leaflet

Electors recall of receiving the leaflet in the postal pack was high, with eight in 10 registered postal voters noting they had received a leaflet from Tower Hamlets Council (81%). The majority also agreed that the language used, the clarity of the message, and the layout was good or very good (85%, 81%, and 73% respectively), and that the leaflet was easy to understand (81%).

Just under half of electors recalled 'Your vote is yours alone' as the key message from the leaflet (49%). 'You should report suspicions of electoral fraud' was recalled significantly more often as a key message of the leaflet than in the other pilots (24%).

5.5.3.3. Delivery

Planning for the pilots fell within the overall planning for the election, rather than as a separate initiative. The team felt they were planning throughout the process rather than upfront. In future, they would prefer the pilot Order to be signed earlier, to allow for more preparation time.

Tower Hamlets also chose to call households rather than running face-to-face checks, as opposed to Peterborough and Slough, based on previous experience with door knocking that had been resource intensive.

The team carried out two separate training sessions; one for the team co-ordinating the activity in the office, and another for those making the phone calls. The training felt relatively straightforward to administer and the requirements simple to explain. The team noted that they used professional call centre workers to conduct the phone calls with electors, and they believed them to be competent in carrying out their task. They felt using experienced call centre staff added value as they were able to input on making the script more accessible for those they were calling.

Some electors questioned where callers got their telephone numbers from, and some electors were confused when they received the call after they had already sent back the postal pack. Overall, the team noted that delivery of the requirements was a positive process.

5.5.3.4. Affordability

The postal vote model in Tower Hamlets is estimated to have cost approximately £19.8k, or £0.71 per registered postal voter. Consistent with the cost evaluation of the postal vote model in both Peterborough and Slough, these costs exclude publicity costs. As shown, the main driver of the total cost was of facilities, which was made up of IT software required for the telephone survey and additional room hire. This made up 36% of total costs. The cost of hiring additional staff and the cost of producing and distributing anti-fraud leaflets each made up 32% of total costs.

6. Conclusion

While the findings are robust in indicating the impact of the ID requirements within each piloting authority, there are limitations to the extent to which the findings presented here can be generalised to understand behaviour across Great Britain, and to different types of elections. The measures provide the foundations, and a benchmark for, a broader evidence base to be developed to understand how the ID requirement will impact electors and mechanisms for delivery more broadly.

Integrity measures consistently increased in the photographic ID model, and showed varied results across sites in the mixed ID model and poll card model. Confidence and satisfaction in the process of voting significantly increased post election day in the photographic ID model. Levels of confidence significantly increased in one of the two poll card models (Watford) but satisfaction remained unchanged. In contrast, confidence remained unchanged in both mixed ID models but satisfaction significantly increased in one of the two mixed ID models (Gosport).

The belief that there are sufficient safeguards and that polling stations are safe from fraud and abuse has significantly increased post election day in the photographic ID model. Perceptions of there being sufficient safeguards increased in both mixed ID models, but the belief that polling stations are safe from fraud and abuse only significantly increased in one of the two mixed ID models (Gosport). Similarly, perceptions of sufficient safeguards and the belief that polling stations are safe from fraud and abuse has only significantly increased in one of the two poll card models (Watford).

The view that photographic ID was an effective measure to reduce electoral fraud significantly increased in the photographic ID model, one of the two mixed ID models (Bromley) and one of the poll card models (Watford). The perception that non-photographic ID was effective increased in one of the poll card models (Watford) but decreased in one of the mixed ID models (Gosport).

The perception of electoral fraud has significantly decreased at a local level and significantly increased at a GB level in the photographic ID model and the mixed ID model (although Gosport remains unchanged on perceptions of fraud at a GB level). In contrast, perceptions of levels of electoral fraud significantly increased at a local level in one of the two poll card models (Swindon) and at a GB level (Watford).

We cannot generalise the impact that the requirements had on measures of integrity. Further research would be required to understand what is driving these differences across LAs. While having a measure of these perceptions is useful in considerations for policy creation for further pilots, or for national roll out, it would be misleading to apply these figures to populations of other LAs, to the national population, or to another type of poll. **The results for the Democracy and Equality measures are more consistent across piloting authorities.** Based on the public opinion survey there is no indication that the ID requirement impacted the reasons for not voting for any specific demographic group across the participating authorities. Some groups were generally less confident in how to go about casting a vote and were generally less satisfied in the process of voting - this is independent of the ID requirement and this score did not significantly change pre/post pilot.

The most cited communication channel for awareness of the pilot was predominantly the poll card (both the poll card model and the mixed ID model) with only the

photographic ID model citing a leaflet from the local council as being the most referenced communication source. All models found direct local sources to be the most effective communication.

The most popular ID used was a driving licence in both the photographic model and the mixed ID model, with the passport being the second most popular. The poll card was most popular in the poll card model with a driving licence being used as a second favourite option in this model.

There was also consistency among authorities in terms of Delivery measures. Based on feedback from electoral services teams, most of the pilot requirements were able to be delivered in conjunction with business as usual activities for an election. While most piloting authorities would have preferred more time to plan for the delivery of the requirements most were able to integrate voter ID training into the standard training and guidance given to polling station staff.

Perceptions of election day were largely positive across models, with polling station staff giving positive feedback on the process, particularly in the poll card sites. The mixed ID model and photographic ID model found that the printed A3 data capture form was difficult to use in practice, with the mixed model finding this more of an issue due to a bigger list of ID requirements.

LAs would largely pilot the same approach again, with one of the mixed models (Bromley) citing they would reduce the number of ID options. The poll card models reflected that their model would need less of a behaviour change, with one citing that electors already bring their poll card to vote (Watford).

The central role that Cabinet Office and the Electoral Commission play were seen as being integral to further pilots or national roll out. All local authorities stated that a communication campaign would have to be centrally delivered, with one set of requirements nationally.

Electoral services teams delivering the postal pilots were not confident that the requirements piloted would decrease electoral fraud. However, LAs did note that there was value in the pilot as an elector engagement exercise, given the positive feedback they received from electors in reaction to being contacted. One authority felt that it was important to be visible in taking steps to address electoral fraud. The accompanying leaflet was well received by postal voters and across pilots the electoral services teams thought it was a welcome addition.

In terms of Affordability, the Poll card model was less expensive than the others in terms of non-technology costs. The Mixed ID and Photographic ID models were broadly in line with each other in terms of affordability.

7. Annex A - Sir Eric Pickles' Electoral Fraud Review

In 2016, Sir Eric Pickles published a review into electoral fraud in Great Britain²⁷. 50 recommendations for tackling electoral fraud were made, and the Government has committed to further consideration of 48²⁸, including requiring voters to provide a form of identification at polling stations before voting.

The report recommended that the Government consider voters and proxy voters producing personal identification (**R8 and R24**) and enhance measures to protect the integrity of the postal vote process (**R23**).

The Cabinet Office offered all local authorities in Great Britain the opportunity to pilot voter ID in their May 2018 local elections to enable the Cabinet Office to identify the best way to implement voter ID nationally.

Woking, Gosport, Bromley, Swindon and Watford piloted voter ID. Tower Hamlets, Slough and Peterborough piloted measures to improve the integrity of the postal and proxy vote process.

The following section contains the recommendations presented in Sir Eric Pickles' review into electoral fraud that have been taken forward by Cabinet Office for piloting.

7.1. Recommendations

- **R8** - The Government should consider the options for electors to have to produce personal identification before voting at polling stations. There is no need to be over elaborate; measures should enhance public confidence and be proportional. A driving licence, passport or utility bills would not seem unreasonable to establish identity. The Government may wish to pilot different methods. But the present system is unsatisfactory; perfection must not get in the way of a practical solution.
- **R23** - It should be standard practice for local authorities to provide guidance in postal ballot packs on the secrecy of the vote and how to report electoral fraud.
- **R24** - The provisions on an ID requirement in polling stations should apply to those casting a vote as a proxy on behalf of a voter.

²⁷ Cabinet Office (2016) Securing the ballot: Review into electoral fraud <https://www.gov.uk/government/publications/securing-the-ballot-review-into-electoral-fraud> (accessed June 2018)

²⁸ Cabinet Office (2016) A democracy that works for everyone: a clear and secure democracy <https://www.gov.uk/government/publications/a-democracy-that-works-for-everyone-a-clear-and-secure-democracy> (accessed June 2018)

8. Annex B - Research into Electoral Fraud

Currently, staff working in polling stations may ask two statutory questions to further establish the identity of a voter they suspect of a personation offence:

- Are you the person registered in the register of electors for this election as follows?
- Have you already voted here or elsewhere at this election, otherwise than as proxy for some other person?

These limited checks in polling stations mean that electoral fraud is hard to prevent and detect, and the lack of a mechanism for verifying voter identities was cited as the main vulnerability of polling station voting by respondents surveyed by the Electoral Commission²⁹

8.1. Reported Incidents of Electoral Fraud³⁰

Despite difficulties in detection, there were 336 reported incidents of alleged electoral fraud across the UK at the elections in 2015³¹, however of these incidents nearly two thirds (207) were found to either not be an offence, or had insufficient evidence to support the claim of fraud.

Nearly half of these cases (165) related to campaigning offenses, which could include failure to include details about the printer, promoter and/or publisher on election material, making false statements of fact about the personal character or conduct of a candidate, or failure to submit a return of elections expenses.

Over a quarter of the reported incidents (104) were related to fraudulent voting, which could include personation (voting as someone else), breaches of the secrecy requirements, tampering with ballot papers, bribery or treating, or undue influence.

The remaining incidents related to nomination offences (25), which could include false statements or signature made on nomination forms; and registration offences (36), which could include providing false information in a registration or absent vote application form.

8.1.1. Fraudulent Voting

A more in-depth look at the 104 reported incidents involving fraudulent voting allows us to identify which of these could possibly have been prevented by voter ID being introduced at the polling station.

The most frequently reported type of voting fraud is related to the offence of personation (i.e. voting as someone else) (Table 5). 28 of these incidents were reported as occurring at the polling station, and 22 when using a postal vote. In addition, there were 13 cases related to the offences of personation by proxy. The remaining 41 voting cases related to the offence of undue influence (14), breaches of secrecy requirements (8), attempts to tamper with ballot papers (3), alleged bribery (8) and treating (8).

²⁹ Electoral Commission, Electoral fraud in the UK, January 2014

http://www.electoralcommission.org.uk/_data/assets/pdf_file/0008/164609/Electoral-fraud-review-final-report.pdf

³⁰ Electoral Commission, Analysis of cases of alleged electoral fraud in the UK in 2015, March 2016

http://www.electoralcommission.org.uk/_data/assets/pdf_file/0011/198533/Fraud-allegations-data-report-2015.pdf

³¹ Elections included: a UK Parliamentary election, elections for local councillors in metropolitan boroughs, district authorities and unitary authorities in England, Elections for Mayors in six English local authorities, and a Parliamentary by-election.

Table 5: Reported offences of personation during 2017 elections

Method	In person	Postal vote	By proxy
Number of incidents	28	22	13

Of these personation offences, it is possible that the requirement of photographic ID at the polling station could have prevented the perpetrator from voting as someone else in person. It is not clear what the impact of non-photographic identification would have had upon these offences, or upon offenses of personation conducted by postal vote or proxy.

It is important to note that for the majority of these cases (74) the police took no further action following their investigations. In 22 cases this was because investigations suggested that no offence had been committed, and in 23 cases there was insufficient evidence to prosecute. In 24 cases it was not possible to identify a suspect, and in 4 cases the police identified that the offence did not involve electoral fraud.

8.2. Previous Allegations of Electoral Fraud in Piloting Authorities³²

At the time of publication, no allegations of electoral fraud had been received in the ID piloting authorities for 2018. Previous cases of alleged electoral fraud were found in Watford (Table 6) are Woking (Table 7). There were no historical allegations of electoral fraud in Swindon, Bromley and Gosport. Historical allegations of electoral fraud are also noted for the postal pilot local authorities (Tables 8-10) and for 2018, accurate at time of publication.

Table 6: Historical Allegations of fraud in Watford (2014-2018)

Year	Total Allegations	Allegations Voting	Reason: personation/legal incapacity to vote/multiple voting
2014	0	0	0
2015	3	2	2
2016	1	0	0
2017	7	5	4
2018	0	0	0

Table 7: Historical Allegations of fraud in Woking (2014-2018)

Year	Total Allegations	Allegations Voting	Reason: personation/legal incapacity to vote/multiple voting
2014	1	0	0
2015	3	2	2
2016	3	1	1
2017	0	0	0
2018	0	0	0

³² All historical allegations of fraud are from the Electoral Commission's electoral fraud data and analysis:

<https://www.electoralcommission.org.uk/find-information-by-subject/electoral-fraud/data-and-analysis>

Table 8: Historical Allegations of fraud in Peterborough (2014-2018)

Year	Total Allegations	Allegations Voting	Reason: personation/legal incapacity to vote/multiple voting
2014	1	0	0
2015	3	2	2
2016	3	1	1
2017	0	0	0
2018	3	3	3

Table 9: Historical Allegations of fraud in Slough (2014-2018)

Year	Total Allegations	Allegations Voting	Reason: personation/legal incapacity to vote/multiple voting
2014	2	0	0
2015	2	1	0
2016	0	0	0
2017	0	0	0
2018	2	0	0

Table 10: Historical Allegations of fraud in Tower Hamlets (2014-2018)

Year	Total Allegations	Allegations Voting	Reason: personation/legal incapacity to vote/multiple voting
2014	54	24	13
2015	31	18	9
2016	2	2	2
2017	16	3	2
2018	50 ³³	N/A	N/A

8.3. Public Confidence

In 2014, the Electoral Commission³⁴ commissioned research to find out more about public attitudes towards electoral fraud. Their research found that people do not have a deep understanding about electoral fraud but they do have a general concern about the possibility of fraud taking place.

Additionally, evidence from the research showed that the views of the public are rarely influenced by first-hand experience of electoral fraud, but instead by cases reported in the

³³ Of which 5 of these are allegations of registration offences which fall under false registration for a postal vote (under investigation). Data collected from the police force in each LA on the 5th July 2018.

³⁴ Electoral Commission, Electoral fraud in the UK, January 2014

http://www.electoralcommission.org.uk/_data/assets/pdf_file/0008/164609/Electoral-fraud-review-final-report.pdf

media and their own set of assumptions. Importantly, they found a small ‘research effect’ whereby asking about the topic of electoral fraud and discussing potential vulnerabilities in the system in more detail increased concerns.

The most recent report from the Electoral Commission Winter Tracker³⁵ found that in general voting was considered to be safe from fraud or abuse by 84% of respondents, however much greater confidence was placed in the safety of voting at a polling station (88%) than by post (73%). Additionally, when asked what single measure would be most effective in preventing electoral fraud, over a third of respondents supported a requirement to show photographic ID at the polling station (37%).

In 2014 the Electoral Commission commissioned an additional sample of BAME respondents for the Winter Tracker³⁶. Three quarters of those surveyed (76%) thought that registering to vote was safe from fraud or abuse, a steady decrease from the previous two years for BAME audiences (2013: 77%; 2012: 81%). Considerably more (18%) had heard about electoral fraud happening from someone they know compared to the wider population in 2014 (9%) and one in twenty (5%) said they had first-hand experience of seeing electoral fraud (compared to 3% of the overall population at the time). BMEs (15%) were also considerably more likely than the wider population (6%) to say that electoral fraud is very common where they live.

8.4. Availability of Photographic ID in Great Britain

The types of voter ID in the pilots were not restricted to passports or driving licences – but typically included poll cards and bank statements. No-one needed to purchase identification documents to be able to vote in these pilots. Local authorities provided alternative methods, free of charge, to ensure that everyone who was registered had the opportunity to vote. The full list of ID accepted in the different pilots is set out in Annex D.

The Electoral Commission³⁷ have previously recommended that if ID were to be implemented in polling stations, only forms of photographic ID which possess certain security features, and an adequate level of verification to obtain should be accepted. This included:

- Photographic driving licence
- Passport
- Proof of Age Standards Scheme (PASS) card
- Military identification card
- Police identification card and firearms licence
- Certain photographic public transport passes (e.g. Oyster)

³⁵ Electoral Commission, Winter Tracking Research, March 2018
https://www.electoralcommission.org.uk/_data/assets/pdf_file/0015/244041/Winter-Tracker-Topline-findings-2018.pdf

³⁶ Electoral Commission, Winter Track Research Survey: BME Booster, December 2014
http://www.electoralcommission.org.uk/_data/assets/pdf_file/0010/183079/Winter-Tracker-2014-BME-Booster-Survey-Topline.pdf

³⁷ Electoral Commission, Delivering and costing a proof of identity scheme for polling station voters in Great Britain, December 2015
http://www.electoralcommission.org.uk/_data/assets/pdf_file/0004/194719/Proof-of-identity-scheme-updated-March-2016.pdf

The Electoral Commission estimated that approximately 3.5m electors (7.5% of the GB electorate) would have no forms of the above photo ID, and limiting the list to passports and photographic driving licences would see potentially 11 million electors (24% of the electorate) without acceptable ID. Reducing the list to only passports, photographic driving licences and Oyster photocard would reduce the number of electors without ID to 6m (13% of the electorate).

The Electoral Commission's research also highlighted that certain groups are less likely than the general population to hold an eligible passport, including: older people, people who are 'White: Gypsy or Irish Traveller' and people who are 'Mixed/multiple ethnic groups: White and Black Caribbean'.

8.5. Voter ID in Northern Ireland

The requirement for voter ID at the polling station has been in operation since 1985 in Northern Ireland, with photographic ID required from 2003 onwards. Before 2003 voters could present non-photographic identity documents, however this system was considered to still be vulnerable to fraud because of the ease with which identity documents could be falsified and the fact that non-photographic identity documents were regarded as providing insufficient proof of identity.

The list of acceptable photographic ID is supported by the availability of a voluntary elector ID card for people (free of charge). The Northern Ireland scheme requires voters to produce one of the following documents to confirm their identity:

- A UK, Irish or EEA driving licence (photographic part).
- A UK, Irish or EU passport (EU passports are not accepted at UK Parliamentary elections).
- A specified public transport pass.
- An Electoral Identity Card issued by the Chief Electoral Officer for Northern Ireland.

The document does not need to be current, but the Presiding Officer must be satisfied that the photograph is of a good enough likeness. A report by the Electoral Commission³⁸ on the 2007 Northern Ireland Assembly election found that 99% of voters surveyed had experienced no difficulties with electoral ID on election day.

Almost 100,000 Electoral Identity Cards were issued during the first year of implementing the new requirement for photographic ID, less than 10% of the registered electorate at that time. On average, 25,000 new or replacement cards are issued annually of which half are provided to those registering to vote at schools for the first time.

There were significant initial setup costs in implementing the Electoral Identity Card scheme, including: data capture and validation as well as card production and distribution. Additional costs were also associated with public awareness campaigns by the Electoral Commission. It is estimated that initial setup costs were approximately £1.7m³⁹.

³⁸ Electoral Commission, Electoral fraud in the UK, January 2014
http://www.electoralcommission.org.uk/_data/assets/pdf_file/0008/164609/Electoral-fraud-review-final-report.pdf

³⁹ Electoral Commission, Delivering and costing a proof of identity scheme for polling station voters in Great Britain, December 2015

Since the introduction of photographic ID at polling stations there have been no reported cases of personation, and the Chief Electoral Officer's 2003-04 report concluded that the photographic identification scheme in Northern Ireland had "almost entirely removed the opportunity for personation".

http://www.electoralcommission.org.uk/_data/assets/pdf_file/0004/194719/Proof-of-identity-scheme-updated-March-2016.pdf

9. Annex C - Pilot Selection Criteria

Cabinet Office were interested in taking forward a small number of pilots in authorities representing a diverse range of relevant socio-economic and demographic conditions and different types of area (e.g. metropolitan, rural, urban).

Local Authorities were asked to submit an expression of interest and formal application for piloting if they met, or expected to meet, the requirements outlined below:

- have local elections scheduled for May 2018;
- demonstrate there is local support for the pilot;
- be able to demonstrate understanding of the Government's objectives for the project and how the pilot fits with these objectives;
- be able to demonstrate the feasibility of delivering the pilot within the available time frame;
- demonstrate that there are effective planning management arrangements in place and sufficient resources and capacity in the local authority to deliver the pilot, including availability of staff after the election to contribute to the evaluation process;
- be able to demonstrate any management of service suppliers;
- be able to demonstrate understanding of the contingencies needed to be in place particularly to protect the security and integrity of the election;
- be able to present a clear and comprehensive communications plan covering all stakeholders;
- demonstrate the Electoral Commission's evaluation process will be fully supported;
- demonstrate the pilot has an effective business case and offers value for money;
- be able to demonstrate there is learning value to be gained from conducting the pilot and there is a clear means of testing the impact of the innovation;
- demonstrate that any innovation is at least as secure as conventional electoral practices; and
- demonstrate that the pilot will maintain public confidence in the electoral process, that key risks and issues have been identified, and that a plan has been drawn up for managing them.

10. Annex D - List of Accepted IDs at Polling Station

10.1. IDs Accepted

Bromley, Gosport, Swindon, Watford, and Woking required all electors to present a form of ID at the polling station in order to vote. Peterborough only required proxy electors to present a form of ID at the polling station in order to vote.

BROMLEY:

One of the following:

- a passport issued by a Commonwealth country or a member state of the European Union;
- a photocard driving licence (including a provisional licence) issued in the United Kingdom or by a Crown Dependency, or by a member State of the European Union;
- an electoral identity card issued under section 13C (electoral identity card: Northern Ireland) of the Representation of the People Act 1983;
- a biometric immigration document issued in the United Kingdom in accordance with regulations made under section 5 of the UK Borders Act 2007;
- an identity card issued in the European Economic Area;
- an Oyster 60+ London Pass;
- a Freedom Pass (London);
- a PASS scheme card (national proof of age standards scheme);

Or two of the following (one of which must show the registered address):

- a valid bank or building society debit card or credit card;
- a mortgage statement dated within 3 months of the date of the poll;
- a bank or building society statement dated within 3 months of the date of the poll;
- a bank or building society cheque book;
- a credit card statement dated within 3 months of the date of the poll;
- a council tax demand letter or statement dated within 12 months of the date of the poll;
- a utility bill dated within 3 months of the date of the poll;
- a Form P45 or Form P60 dated within 12 months of the date of the poll;
- a poll card for the poll;
- a birth certificate;
- a marriage or civil partnership certificate;
- an adoption certificate;
- a firearms certificate granted under the Firearms Act 1968;
- the record of a decision on bail made in respect of the voter in accordance with section 5(1) of the Bail Act 1976;
- a driving licence (including a provisional licence) which is not in the form of a photocard.

Or, a certificate of identity.

GOSPORT:

One of the following:

- a passport issued by a Commonwealth country or a country within the European Economic Area;
- a photocard driving licence (including a provisional licence) issued in the United Kingdom or by a Crown Dependency, or by a member State of the European Union;
- an electoral identity card issued under section 13C (electoral identity card: Northern Ireland) of the Representation of the People Act 1983;
- a biometric immigration document issued in the United Kingdom in accordance with regulations made under section 5 of the UK Borders Act 2007;
- an identity card issued in the European Economic Area;
- an Oyster 60+ London Pass;
- Disclosure and Barring Service certificate showing the voter's registered address
- an identity card issued by the Ministry of Defence which bears a photograph of the elector.
- a defence privilege card issued by the Ministry of Defence
- a concessionary travel photo card issued by any local authority within the County of Hampshire.

OR two of the following (one must show their registered address):

- Driving licence without photo;
- a birth certificate;
- an adoption certificate;
- a marriage or civil partnership certificate;
- a valid bank or building society debit/credit card;
- Financial statement, such as a bank or mortgage statement (issued within 12 months of voting day);
- Council tax demand letter or statement (issued within 12 months of voting day);
- Utility bill (issued within 12 months of voting day);
- P2, P6, P9, P45 or P60 (issued within 12 months of voting day);
- Statement of benefits or entitlement to benefits. (issued within 12 months of voting day);

SWINDON:

- Voters' poll card;
- a passport issued by a Commonwealth country or a member State of the European Union;
- a photocard driving licence (including a provisional licence) issued in the United Kingdom or by a Crown Dependency, or by a member State of the European Union;
- an electoral identity card issued under section 13C (electoral identity card: Northern Ireland) of the Representation of the People Act 1983;
- a biometric immigration document issued in the United Kingdom in accordance with regulations made under section 5 of the UK Borders Act 2007;
- an identity card issued in the European Economic Area.

As a last resort, if an elector did not have their poll card or other acceptable ID, they were able to bring someone with them to **attest to their identity** and allow them to vote. The person attesting needed to be registered at the same polling station and have already voted themselves or have the ability to vote by presenting their poll card or other form of ID.

WATFORD:

- a poll card;
- a passport issued by a Commonwealth country or a member State of the European Union;
- a photocard driving licence (including a provisional licence) issued in the United Kingdom or by a Crown Dependency, or by a member State of the European Union;
- an electoral identity card issued under section 13C (electoral identity card: Northern Ireland) of the Representation of the People Act 1983;
- a biometric immigration document issued in the United Kingdom in accordance with regulations made under section 5 of the UK Borders Act 2007;
- an identity card issued in the European Economic Area; or
- a valid bank or building society debit card or credit card.

WOKING:

- a passport issued by a Commonwealth country or a member State of the European Union;
- a photocard driving licence (including a provisional licence) issued in the United Kingdom or by a Crown Dependency, or by a member State of the European Union;
- an electoral identity card issued under section 13C (electoral identity card: Northern Ireland) of the Representation of the People Act 1983;
- a biometric immigration document issued in the United Kingdom in accordance with regulations made under section 5 of the UK Borders Act 2007;
- an identity card issued in the European Economic Area;
- a Senior Bus Pass issued by Surrey County Council;
- a Disabled People's Bus Pass issued by Surrey County Council;
- a Student Fare Card issued by Surrey County Council;
- 16 - 25 Railcard issued by the Association of Train Operating Companies;
- a railway season ticket photocard;
- a local electoral card.

PETERBOROUGH:

Peterborough tested **photographic ID** for **proxy voters**.

- a passport issued by a Commonwealth country, a country within the European Economic Area or Switzerland;
- a photocard driving licence (including a provisional licence) issued in the United Kingdom or by a Crown Dependency or by a member State of the European Union;
- an electoral identity card issued under section 13C (electoral identity card: Northern Ireland) of the Representation of the People Act 1983);
- a biometric immigration document issued in the United Kingdom in accordance with regulations made under section 5 of the UK Borders Act 2007;
- an identity card issued in the European Economic Area which bears a photograph of the voter;
- a disabled person’s bus pass issued by Peterborough City Council;
- an identity card issued by the Ministry of Defence which bears the voter’s photograph.

10.2. Locally Issued IDs

Any elector unable to comply and produce the necessary identification were offered another available option for proving their identity. Locally issued ID was made available, free of charge, whenever an elector was unsure they were able to produce the required ID, be it photographic or not. Table 11 below demonstrates the each local authority deadline for requesting a locally issued ID.

Table 11 - Deadlines for issuing council IDs

Locally issued ID and deadline for issue					
Bromley	Gosport	Swindon	Watford	Woking	Peterborough (proxy voters)
Certificate of Identity 5pm the day before poll	Electoral Identity Letter (with photo) 5pm day of poll	Poll card for the poll 9pm day of poll	Poll card for the poll 9pm day of poll	Photographic local elector card 5pm the day before poll	Electoral identity letter 5pm on the day of poll

11. Annex E - Research Questions

11.1. ID Research Questions

These questions helped to frame our research design, analysis and evaluation, and were considered alongside limitations to data collection.

Integrity

- What is the [likely] impact on incidences of in-person electoral fraud?
- How do requirements impact public confidence in the security of the electoral system and perceptions of fraud?

Democracy & Equality

- To what extent do requirements affect the proportion of all electors, overall and in key groups, who are able to vote?
- To what extent are electors aware of the requirements, overall and for key groups?
- To what extent do requirements affect accessibility?
- To what extent do requirements affect turnout, overall and for key groups?
- To what extent do requirements affect the proportion of electors wanting to vote, who are able to do so, overall and in key groups?
- To what extent do requirements affect proportion of electors turning out to vote who are able to do so, overall and in key groups?
- To what extent do electors understand the requirements, overall and for key groups?

Delivery

- To what extent are requirements straightforward, practical and workable for those who manage and administer elections, including Returning Officers and polling station staff?
- What, if any, practical arrangements or process changes are needed to deliver the requirements successfully?
- What training is needed for polling station staff?
- Are Local Government, Electoral Service teams and polling station staff, and Central Government, able to meet one-off implementation, annual and ongoing delivery requirements?
- What, if any, disruptions or delays occur to the process as a result of the requirements?
- Can the requirements be delivered in the context of all types of poll?
- Can the requirements be delivered in any/all polling stations nationwide?

Affordability

- What is the monetary cost of the requirements to Central Government and Local Government, including one-off implementation and annual and ongoing delivery for elections?
- Do requirements result in any changes in costs to Central or Local Government of related processes (e.g. registration)?

11.2. Postal Vote Research Questions

Integrity

- How do the requirements for guidance in postal packs impact the awareness of the secrecy of the vote?

- To what extent do the requirements increase the Electoral Service team's confidence in administering the system of postal voting?

Democracy & Equality

- To what extent do electors understand the guidance in postal packs and the mechanism for reporting any suspicion of fraudulent postal voting?

Delivery

- To what extent are requirements straightforward, practical and workable for those who manage and administer postal voting?
- What additional training is needed for staff?

Affordability

- What is the resource and cost of the requirements to Central and Local Government?

12. Annex F - Cost Data Methodology

12.1. Cost Categories

To make costs consistent and comparable between each pilot model, costs were separated into the categories detailed below. Costs for the mixed ID model are based on cost data provided by local authorities Bromley and Gosport; costs for the photographic ID model are based on cost data provided by Woking; and costs for the poll card model are based on cost data provided by Swindon and Watford. Only costs included within those categories were scaled-up in order to model costs of a national roll-out. As mentioned, some reported costs were specific to the running of the pilot and would not be incurred during a national election - these costs are identified in the section below.

Although communications costs were a large cost for each pilot authority, they were not included as a category. This is because during a general election, the Electoral Commission typically undertakes centralised national publicity campaigns before all major polls. We expect that the messaging surrounding the new requirement for ID would result in limited additional costs due to the mature and developed communication channels that the Electoral Commission has in place. Local authorities often incur additional expenditure on publicity using their own budgets; again, we expect that this activity would incorporate messaging for ID requirements and therefore will not result in additional costs.

12.2. Staff Costs

12.2.1. *Included and Excluded Costs*

Only costs incurred by the hiring of additional polling station staff and additional administrative support staff were included. Excluded costs include fees paid to staff to test IT software; higher fees paid to polling station staff; staff travel and accommodation costs; emergency staff costs; additional days of management; and any other costs considered discretionary.

12.2.2. *Scale-Up*

Additional staff per polling station variables were constructed, based on information that both authorities provided us with. This could be applied to all constituencies across the UK, and then multiplied by the cost of staff in each authority. Regional variation in differences in staff costs was accounted for by the regional cost index.

12.3. Training Costs

12.3.1. *Included and Excluded Costs*

Only costs of training new or existing polling station staff on their additional responsibilities were included. Excluded costs include any training resource considered discretionary or unnecessary in the event of a national roll-out, such as the hiring of training venues and handbooks for polling station staff.

12.3.2. *Scale-Up*

As above, additional training per polling station variables were constructed, based on information that both authorities provided us with. This could be applied to all constituencies across the UK, and then multiplied by the cost of training in each authority.

12.4. Facilities Costs

12.4.1. Included and Excluded Costs

Only costs incurred by the purchase of legally required additional facilities for the purpose of the pilot were included. Excluded costs include anything that was not legally required for the running of the pilot or that would not be needed for the running of the pilot as a business-as-usual election, for example 'wait here' signs and polling station register printing. The latter was needed only to record data required for evaluation of the pilots.

12.4.2. Scale-Up

Local authorities were mandated by the pilot orders to provide privacy screens and handheld mirror for electors to remove and adjust any headwear. Only one authority provided information on the cost and number required of these. From this information, a number required per polling station variable and a cost per unit were constructed. As above, this could be applied to all constituencies across the UK.

12.5. Council Issued ID

12.5.1. Included and Excluded Costs

Costs incurred in the production and delivery of the ID specific to each authority were included. None of these costs were considered to be inessential for a national roll-out and therefore none were excluded.

12.5.2. Scale-Up

In each pilot authority, a new form of council issued ID was used as either the primary form of identification, or the form of identification that could be requested if an elector could not source any of the primary forms. The costs associated with these were reached by calculating a percentage share of the electorate that requested ID, and the postage and production costs per ID. Each of these could be applied to all constituencies across the UK based on the size of the electorate in each.

12.6. IT (Poll Card Model Only)

12.6.1. Included and Excluded Costs

Only costs incurred in the purchase of software licenses and accompanying hardware were included. Excluded costs include any costs incurred in software product development, which would be incurred by suppliers of those products, and, in the event of national roll-out, would not be relevant to government.

12.6.2. Scale-Up

A per polling station variable for the cost of IT equipment was calculated based off of information from authorities that used IT equipment, and applied to all constituencies across the UK.

12.7. Accounting for Regional Variation

To account for the regional variation in costs, we have utilised data from the Elections Claims Unit. The Elections Claims Unit handles claims for fees and charges for UK Parliamentary and PCC elections in England and Wales. This has allowed us to vary staff and training costs across the UK based upon the typical costs within each constituency during previous elections.

13. Annex G - Public Opinion Answers

Table 12 - Q12B: Thinking about the 3rd May 2018 local elections specifically, why did you not vote?

	Bromley	Gosport	Swindon	Watford	Woking
I forgot	5%	6%	7%	6%	5%
Too busy/didn't have time e.g. at work, studies*	28%	16%	15%	36%	23%
Away at the time e.g. on holiday, working away*	10%	12%	9%	15%	9%
Couldn't be bothered/wasn't interested/apathy	9%	18%	9%	8%	10%
Didn't know anything about it	0%	1%	3%	1%	1%
Didn't know who to vote for	0%	4%	1%	2%	*%
Just didn't want to vote	3%	3%	1%	2%	4%
Ill health/disability prevented me	5%	5%	1%	3%	4%
Didn't receive a polling card	1%	*%	2%	1%	0%
Just moved to the area	1%	1%	3%	3%	4%
Family responsibilities/looking after children*	2%	2%	1%	2%	1%
I never vote	1%	1%	2%	2%	1%
I had to show ID/didn't have any photo ID	4%	5%	1%	1%	1%
Didn't have enough information	4%	4%	6%	4%	3%
Nothing gets done/it's all talk but no action/they don't listen	4%	3%	2%	-	*%
They're all the same/as bad as each other	2%	2%	1%	0%	1%
It wouldn't make any difference/there's no point/waste of time	4%	3%	3%	2%	1%
Don't vote in local elections	0%	2%	2%	1%	2%
Don't trust the candidates/they tell lies	1%	4%	3%	1%	1%
Don't understand politics	0%	3%	1%	1%	1%
Not registered/eligible to vote	5%	*%	6%	2%	3%
Not relevant in this ward/no voting in this area	0%	0%	5%	0%	0%
Disillusioned/fed up with politics	1%	-	2%	3%	-
No party/candidate represented my views	0%	2%	0%	1%	-
Answered incorrectly	2%	1%	3%	1%	18%
Other	5%	6%	12%	4%	3%
No particular reason	0%	-	2%	1%	1%

Can't remember	2%	-	0%	2%	2%
Not answered/ prefer not to say	2%	3%	5%	2%	6%

Number who did not vote: Bromley 127, Gosport 247, Swindon 214, Watford 192, Woking 272

**Too Busy/ Other Commitments - a summary code, grouping together: Too busy/didn't have time e.g. at work, studies, Away at the time e.g. on holiday, working away, and Family responsibilities/looking after children*

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May 2018 voter identification pilot schemes

Findings and recommendations

July 2018

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Summary of key findings

Overall, the voter identification requirements trialled in May 2018 worked well. Nearly everyone in the five pilot scheme areas who went to vote in their polling station was able to show identification without difficulty. The number of people who did not vote because they couldn't show identification was very small.

People in the areas where the pilot schemes took place were significantly less likely to think that electoral fraud took place than people in other areas with elections in May 2018. Returning Officers and their staff in polling stations were able to run the new processes well and without any significant problems.

These pilot schemes have provided useful and important initial evidence about how a voter identification requirement in Great Britain might work in practice. They have also highlighted areas where further work is needed, because there is not yet enough evidence to fully address concerns and answer questions about the impact of identification requirements on voters.

The authorities in England that took part in the 2018 pilot schemes were not sufficiently varied to be representative of the different areas and groups of people across the rest of Great Britain. This means that we can't be sure whether people in other areas would have problems showing identification.

We also know from previous analysis and feedback from other organisations such as Mencap and RNIB that some groups of people may find it harder than others to show a passport, driving licence or travel card as part of a photo identification scheme. We have some limited evidence from these pilots that younger people and those who don't always vote were less likely to say that they would find it easy to show identification. More work is needed to make sure these people can easily get the right kind of identification to be able to vote.

Further work and future pilot schemes

When the UK Government invited local councils to run pilot schemes in May 2018, it also said that it was open to looking at piloting in future elections. We agree that it would be helpful to collect more evidence from further pilot schemes at elections in 2019.

These pilots have shown that there may be several different ways of delivering a voter identification scheme in Great Britain. The UK Government should now focus on what further evidence they need to answer questions and address concerns about the more detailed impact of a voter identification requirement, and how the design of future pilot schemes will help to provide that evidence.

We have identified some important lessons from the 2018 pilot schemes in this report and made recommendations for further work and future pilot schemes. These recommendations, listed on pp 19-21 below, would help

provide the best possible evidence base for any decisions about identification requirements for voters at polling stations in Great Britain.

Our main recommendation is that the UK Government should encourage a wider range of local councils to run pilot schemes in May 2019. These should include a mixture of rural areas and large urban areas, and areas with different demographic profiles. This would help make sure there is more detailed evidence about the impact of voter identification on different groups of people.

Background

The May 2018 pilot schemes

1.1 Voters at polling stations in Great Britain do not need to show any identification before they are allowed to vote. In 2014 we recommended that voters in Great Britain should be required to show a form of identification before they vote at polling stations in future.¹ Voters in Northern Ireland have been required to show photographic identification at polling stations since elections in 2003. We have found little evidence to suggest that the scheme applied in Northern Ireland presents difficulties for people in terms of accessibility.

1.2 In 2016, the UK Government said that it would ask local councils to run pilot schemes in May 2018 to test different ways of identifying voters at polling stations.² It said that pilot schemes would help to see what the impact would be for voters and electoral administrators, and would help them to decide how to design a scheme that could be used for UK Parliament elections and local elections in England.

1.3 Five local councils were selected to run voter identification pilot schemes at their elections on Thursday 3 May 2018:

- Bromley
- Swindon
- Woking
- Gosport
- Watford

1.4 Each pilot scheme had specific rules for how they should work which were agreed between the UK Government and the local Returning Officer. Voters in some areas had to show identification with their photo on; in other

¹ We explained our views in this report: [Electoral Commission \(2014\) *Electoral fraud in the UK: Final report and recommendations*](#)

² The Government explained its views in this report: [Cabinet Office \(2016\) *A Democracy that Works for Everyone: A Clear and Secure Democracy – Government response to Sir Eric Pickles' review of electoral fraud*](#)

areas, voters could show identification without their photo. The Returning Officer for each area ran the processes for the schemes.

1.5 The Cabinet Office, which is part of the UK Government, oversaw all of the pilot schemes in May 2018. The law says that we have to independently evaluate each of the schemes within three months of the elections.³

This report

1.6 This report sets out what we found when we looked at the results of the May 2018 pilot schemes. It also looks beyond these pilot schemes at the implications for the future, and what we think the UK Government should do next.

1.7 To do this, we have looked at the impact of the pilot schemes on voters and on the administration of the elections. We have also looked at the impact of the pilot schemes on public confidence and on the security of the elections.

1.8 We collected information from different sources to help us reach these findings, including:

- A survey asking people what they thought of the schemes.
- A survey of people who worked in polling stations.
- Data about what identification people showed when they voted, and the number of people who were turned away because they didn't have the right identification.
- Inviting feedback from organisations that represent different groups of voters.

1.9 As well as this overall report, we have also written individual evaluations of each of the [specific pilot schemes](#).⁴ These reports have looked at specific questions that the law says we have to consider which are:

- the turnout of voters was higher than it would have been if the scheme had not applied
- voters found the procedures provided for their assistance by the scheme easy to use
- the procedures provided for by the scheme led to any increase in personation or other electoral offences or in any other malpractice in connection with elections
- those procedures led to any increase in expenditure, or to any savings, by the authority

³ The rules for the pilot schemes are set out in Section 10 of this law: [The Representation of the People Act 2000](#)

⁴ [Read these reports and look at the detailed information we collected to help us evaluate the 2018 pilot schemes.](#)

1.10 We have also considered the UK Government's own objectives for the voter identification pilot schemes:

- That proposed 'ID at polling stations' policy measures are proportional to the policy objective of reducing the opportunity for electoral fraud.
- That the proposed 'ID at polling stations' policy measures enhance public confidence in the security of the electoral system.⁵

What we're not able to say in this report

1.11 We can evaluate these schemes against the statutory criteria and the Government's objectives using the data and information we have gathered. However, we are not able to draw definitive conclusions from these pilots on how a voter identification requirement would operate in the future across Great Britain, or at polls with higher levels of turnout.

1.12 This is partly because the available evidence is drawn from only five local authority areas which are not representative of many other areas of Great Britain. There would be different challenges in areas with different demographics.

1.13 These pilots also took place at local elections where turnout is significantly lower than other polls, such as UK Parliamentary general elections. Many people who do not normally vote at local elections will vote at a general election. These people also tend to have different demographic backgrounds to those who normally vote at local elections.

1.14 Further pilot schemes at local elections are unlikely to provide more evidence about the impact of an identification requirement on voters and electoral administration at higher turnout elections. Returning Officers cannot run pilot schemes at UK Parliament elections, so the UK Government may need to look for other sources of evidence about the impact at elections where turnout is likely to be higher. This could include qualitative research with irregular voters and the less politically engaged to test likely reactions to an identification requirement.

Impact on voters

1.15 The evidence we have collected suggests that nearly everyone who wanted to was able to vote in the pilot scheme areas:

- Nearly nine in ten of people who voted in polling stations were aware that they had to take identification with them to the polling station to vote.
- Nearly everyone who went to vote at their polling station was able to show the right identification.

⁵ The Government explained these questions in this document: [Cabinet Office \(2017\) *Electoral Integrity Pilots: Prospectus*](#)

- The number of people who wanted to vote at their polling station who did not have the right identification was very small; many of them came back with the right identification, but some did not.
- There is no evidence that levels of turnout in the pilot scheme areas were significantly affected by the requirement for polling station voters to show identification.

1.16 There were a small number of people who were unable to vote because they did not have, or did not bring with them, the right type of identification. It was not possible to collect demographic data on these people and so we have no evidence to suggest particular demographics were more affected than others. More work is needed to make sure that an identification requirement doesn't stop people who are eligible and want to vote in future elections.

Overall findings from the pilot schemes

Awareness of the identification requirements

1.17 Most people in the pilot scheme areas knew about the identification requirements. Our research found that nearly nine out of ten (86%) of people who voted at polling stations said they were aware beforehand that they had to show identification to vote at their polling station.

1.18 Some groups of people were less likely to say they knew about the identification requirements. Polling station voters in the C2DE social grade were less likely to say they knew beforehand (18% said they did not know about the requirement compared to 9% of ABC1s). In the population as a whole, some groups were less likely to say they had heard something about the pilot. This included people aged under 35, C2DEs, those who said they were generally less politically active, and those who said that they didn't vote in the elections.

1.19 People in Swindon and Watford were also less likely to say they were aware that they needed to show identification. This may be because they didn't consider the requirement to show a poll card as 'identification', although we cannot confirm this from the available data.

1.20 Returning Officers in the pilot scheme areas ran public awareness campaigns before the elections, and awareness about the identification requirements improved between January and May 2018. In January, 36% of people in the pilot scheme areas said they had seen or heard something about the requirement, and by May this had risen to 55%.

Types of identification that voters used

1.21 In Bromley, Gosport and Woking most voters were able to show either their passport or photo driving licence to vote at their polling station. Local travel passes were the third most frequently shown type of identification.

1.22 In Swindon and Watford, the vast majority of voters showed their poll card to vote at their polling station. A small proportion of people showed their photo driving licence, passport, debit or credit card instead of their poll card.

Table 1: Most frequently shown types of identification in each pilot area⁶

	Most frequently shown	2nd most frequently shown	3rd most frequently shown
Bromley	Photo driving licence (54%)	Passport (24%)	Freedom pass (15%)
Gosport	Photo driving licence (55%)	Passport (21%)	Concessionary travel card (17%)
Swindon	Poll card (95%)	Photo driving licence (4%)	Passport (1%)
Watford	Poll card (87%)	Photo driving licence (8%)	Debit card (3%)
Woking	Photo driving licence (60%)	Passport (25%)	Surrey Senior travel card (12%)

1.23 Very few people applied to use the alternative options provided for those who did not have the required identification. No one in Bromley and Gosport applied for a Certificate of Identity or Electoral Identity Letter. Feedback from the Returning Officers in both these areas suggests that most people who contacted them to ask about the alternative option found that they did actually have one of the acceptable forms of identification.

1.24 In Woking, 64 people applied for a Local Elector Card before polling day and 43 voters showed their card as identification at their polling station.

1.25 Voters in Swindon and Watford could show their poll card as part of the required identification, and they were able to apply for a replacement poll card before polling day. Returning Officers issued 66 replacements to voters in Swindon and 3 to voters in Watford. Voters in Swindon could also ask another elector at the same polling station to 'attest' their identity, and 107 voters used this option.

1.26 Although all of the pilot schemes allowed voters to show their identification in private (for example because they were registered to vote anonymously or if they normally covered their face for religious reasons), we are not aware that anyone used this facility. We therefore cannot draw any conclusions about how this process would work in practice.

Impact on turnout and participation

1.27 Although nearly everyone in the pilot scheme areas who went to their polling station to vote was able to show the required identification, a small number did not have the right identification with them and were not given a

⁶ Appendix A sets out the full list of identification requirements for each pilot scheme. [View the full datasets on the identification used at electoral ward level.](#)

ballot paper. Many of these people returned later with the right identification, but some did not.

Table 2: People who did not return to their polling station to vote

Bromley	Gosport	Swindon	Watford	Woking
569 without right identification	120 without right identification	64 without right identification	194 without right identification	89 without right identification
154 did not return	54 did not return	25 did not return	42-66 did not return	51 did not return
0.2% of all polling station voters did not return	0.4% of all polling station voters did not return	0.06% of all polling station voters did not return	0.2% of all polling station voters did not return	0.3% of all polling station voters did not return

1.28 There is little evidence that the voter identification requirements had a direct impact on turnout in the May 2018 pilot scheme areas. In three areas turnout at the local authority level was no more than 1 percentage point lower than the most recent comparable elections. Turnout in the other two areas was higher than, including in Swindon where turnout was 5 percentage points higher. Overall turnout across England in 2018 was the same, at 36%⁷, as at the last comparable set of elections in 2014.

1.29 There were some larger changes in turnout at the individual ward level in the pilot scheme areas. These ranged from an increase of 12 percentage points in one ward in Swindon to a decrease of 8 percentage points in one ward in Bromley.

1.30 The data on turnout and participation cannot tell us much about people who may have decided not to go to their polling station at all because of the identification requirement. However, our research with people in the pilot scheme areas found that 2% of those who didn't vote in May 2018 said it was because they didn't have the right identification. Many more people said they didn't vote because they were too busy (27%), didn't know who to vote for (13%), were away on holiday (12%) or were not interested (10%).

1.31 Most people in the pilot areas (79%) said the requirement to show identification made no difference to whether or not they voted in May 2018, and overall 3% of people said it made them less likely to vote. However, our research did confirm that non-voters were more likely than voters to say that it had made them less likely to vote: 5% of non-voters said it made them less

⁷ Based on turnout from 1,161 wards

likely to vote, and 2% said that they wouldn't have been able to vote because they didn't have any identification.

1.32 Before the May 2018 pilot schemes, accessibility organisations raised concerns that some groups of people would find it harder to vote because they would not easily be able to access the right types of identification. This included concerns about disabled people and people from black and minority ethnic communities, who are also less likely to participate in elections in general.

1.33 Overall, we found no clear pattern of decreased turnout based on the different demographic profiles of specific wards in the May 2018 pilot scheme areas. The relatively small size of the May 2018 pilot schemes, the level of turnout and the limited demographic variation across wards of the pilot schemes means that it is difficult to systematically identify examples of a negative impact for particular groups of people. The limitations of sample-based surveying also mean that we did not get enough responses from specific groups of people to be able to report experiences or views across those groups.

1.34 In Watford we did find a correlation between the proportion of a ward's population that is Asian/British Asian and the number of electors both initially turning up without identification and not returning.⁸ We need to be cautious in drawing conclusions from this analysis as it is based on a small number of data points (only 12 wards in one local authority area). However, this does show that it would be helpful to have more pilots with more diverse populations in order to explore this further.

Beyond the pilots: implications for voters at future elections

1.35 Although we have found that most people who wanted to were able to vote in the pilot scheme areas in May 2018, we have also seen some evidence that particular groups of voters might find it harder to show identification at future elections.

1.36 Our research with people across all elections that took place in May 2018 found that most people (88%) said they would find it easy or very easy to show identification if they had to at future elections. However, we did find that younger people aged 34 and below were slightly less likely (83%) to say they would find it easy. There were no notable differences in responses based on other demographic factors, including social grade, disability or ethnicity.

1.37 We know that more people vote at other types of elections: some people who don't normally vote at local elections often vote at UK Parliament elections, for example. This means, that at other kinds of elections in the

⁸ [Read our evaluation report on the Watford pilot scheme.](#)

future, more people who want to vote could find it difficult to show identification.

Accessibility and equality implications

1.38 Organisations representing the interests of different groups of people raised concerns with us about whether they would have easy access to the right identification if this requirement was applied at more elections in the future.⁹ For example, Mencap, RNIB and Stonewall highlighted the following concerns:

“People with learning disability often do not have ID such as a passport as they are unable to travel abroad or cannot afford it. Almost none will have a driving licence and in some cases will not even have access to utility bills or other forms of ID.”

Mencap submission

“The lack of driving licenses amongst blind and partially sighted people, meaning that they had fewer options of what they could provide at the polling station.”

RNIB submission

“Trans and non-binary people may have been particularly vulnerable to these ID requirements as the photo on their ID may not reflect their gender expression or identity.”

Stonewall submission

1.39 Several organisations also raised concerns with us about the public awareness campaigns that Returning Officers ran in the pilot scheme areas. They were concerned about whether the campaigns did enough to target people from groups that were less likely to have the right identification. For example, both Mencap and RNIB felt that activities to raise awareness with the people they represent did not begin early enough in the May 2018 pilot scheme areas.

1.40 This wider evidence suggests that further work is needed to make sure that an identification requirement doesn't stop people who are eligible and want to vote in future elections. More research and analysis is needed to identify which types of identification will be easiest for people to show, and how those who do not currently have identification can get it.

1.41 This is particularly important for people who may find it harder to show the more common forms of photo identification such as passport, photo driving licence or travel card. We have previously recommended that any photographic voter identification scheme should include a free of charge photographic elector card for people who do not have any other acceptable form of identification.

⁹ [Read all the views sent to us from organisations representing different groups of people.](#)

1.42 More work is also needed to find further ways to tell people about any identification requirement. Again, this should focus on how best to communicate any new requirement to people who are less likely to vote often and those who may find it harder to show one of the more common forms of identification.

Impact on electoral administration

1.43 The Returning Officers and their staff who were responsible for the May 2018 elections successfully ran the pilot schemes in all of the five pilot areas:

- Polling station staff told us that they had no difficulty checking people's identification.
- They were confident that they could do this again at a future election.
- Across all areas, additional staffing and training were required for the pilot.

1.44 These schemes were run at polls with a low turnout, with fewer people voting and showing identification in polling stations. As shown below there are clear lessons that can be learned for future polls where turnout is higher with more people voting in polling stations.

1.45 Delivering the identification requirement has specific implications for the administration of the poll and these are set out in more detail in our individual reports on each pilot scheme. We have considered the administrative impact across four aspects of delivery of the polls below.

Overall findings from the pilot schemes

Staffing and training

1.46 All of the areas increased their staffing in order to deliver the pilot. There were varying approaches to this, ranging from employing ten extra polling station inspectors in Swindon to using one third more polling station staff in Bromley. Clearly there were also additional costs associated with increased staffing. For example, across the pilots the additional staff and training costs ranged from very little to a third of the usual costs at local elections.

1.47 However, in feedback after polling day the pilot areas told us that this increase in staffing would not be required to administer voter identification at future local elections. This is because additional pilot elements, such as the collection of data on polling day (required to inform the evaluation), would not need to take place. A few areas also did not think they would need additional staff at every polling day, even for a higher turnout poll such as a UK parliamentary general election.

1.48 More and/or longer training sessions were also required to support staff in delivering the pilot. However, feedback from electoral administrators in the pilot areas indicated that, while this training required planning and preparation, it did not present a significant challenge for them in running the pilot. We also know that the training was delivered well. Our survey of polling stations staff found that, on average, 94% rated the training they received as good or excellent. Close to 100% of polling staff also told us they were confident about the process they had to follow in order to check voters' identification.

Local identification

1.49 The 2018 pilots offered a limited test of the process and cost of issuing local identification to electors. Three pilots (Bromley, Gosport and Woking) offered a form of local identification but only Woking needed to issue any. This is likely to be because Woking had a narrower identification requirement where electors were slightly more likely to need to use a local option.

1.50 Woking issued 63 local elector cards and their feedback indicates that this process was manageable for them to deliver. However it did incur some additional costs associated with the production and delivery (where needed) of the cards. Gosport did raise a concern in their feedback about their ability to resource the local identification route if it had been significantly used. This was mainly because, as a small local authority, they would have limited flexibility in drawing on resources from other teams.

The impact of IT

1.51 Swindon and Watford both used IT in the polling stations to scan QR codes on electors' poll cards. In both pilots the systems worked well and there were no notable issues on polling day related to the IT. Also, the systems provided Returning Officers with useful, live information on turnout at polling stations that they would not normally have access to.

1.52 However, planning and setting up these IT systems required a significant amount of time and resource commitment from the electoral administration teams, the software suppliers and Cabinet Office. This commitment of time and resource stems largely from the level of security needed to run these systems, which hold significant personal data, as well as the level of assurance and resilience needed to ensure no problems arise on polling day.

1.53 While much of the work was associated with the development of the software, and would not necessarily be needed in the future, there would still be a sizeable level of commitment needed from software suppliers to support any local authorities sites using these systems at future polls. There would also be ongoing costs which local authorities would need to meet in order to use these systems. These include software licensing, hardware (tablets/scanners) and additional staff training.

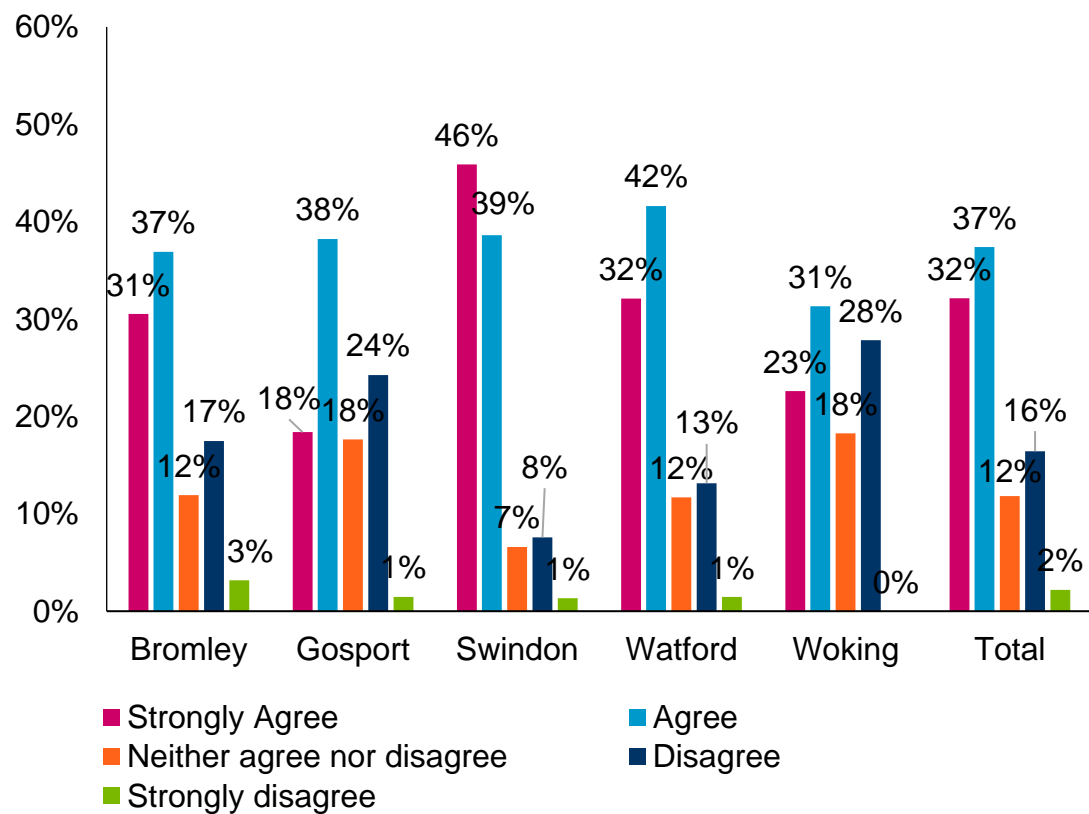
1.54 Given the cost and time needed to support the use of these systems, the merits of including any IT-enabled pilots in future schemes needs to be weighed against the ability to scale up these systems across Great Britain. It

is also not clear from these pilot schemes that additional IT in polling stations (for example to scan barcodes or QR codes) is absolutely necessary to support the use of the poll card as a form of identification.

Polling day

1.55 Feedback from Returning Officers and their staff indicate that delivering the identification requirement on 3 May did not present significant challenges. In response to our survey, 77% of polling station staff said they were very satisfied with how polling day went. This agrees with the feedback we received from Returning Officers which said that few issues had arisen on polling day and that they had received few or no negative responses from the public. These findings also agree with the observations made by Electoral Commission staff on polling day across the five areas. We saw few issues and largely observed processes working well.

Chart 1: Thinking back to your experiences.....asking voters to prove their identity had little or no impact on our work on polling day



1.56 A high proportion of staff (69%) also agreed with the statement that asking voters to prove their identity had little or no impact on their work on polling day. This also suggests that the variation in identification requirements did not make the task in polling stations notably easier or more difficult. Staff in Swindon and Watford (using poll card scanning) were more likely to agree there was little impact but there was little difference across the other areas. The difference in the quantity of different acceptable identification types

between Bromley/Gosport and Woking do not, for example, appear to have made a significant difference to staff.

1.57 We also asked polling station staff if they would feel confident about replicating the requirement to show identification at a future poll and 97% said they would be confident in doing so.

Beyond the pilots: the impact on administration at future elections

1.58 The evidence we have gathered shows that the polls in the pilot areas on 3 May were well run and that the administrative challenges presented by the voter identification requirement were met by the Returning Officers and their staff. Looking beyond the pilots, there could be different administrative challenges which these pilots have not tested, including the need to process and deliver significant volumes of local electoral identification cards/letters.

1.59 The impact and risks for people running the elections could be different at elections with higher turnout with more people voting and showing identification in polling stations, such as a general election.

1.60 Turnout at the May 2018 elections, as is usually the case for local government elections, was relatively low, meaning that the pilots were run on a different scale than might be the case at a UK parliamentary general election. At these local elections between 20-30% of the electorate voted at a polling station whereas at a UK parliamentary election over 50% often vote at a polling station.

1.61 For example, staff in some polling stations in Watford said that scanning the poll card caused delays and queues which could be longer with more people voting. In areas such as Woking, which had a more limited choice of identification, more local elector cards may need to be processed and issued putting pressure on local authority election teams.

1.62 No applications were made in Bromley for the certificate of identity or in Gosport for the electoral identity letter, which means that the pilot did not test the resources required to process applications and issue certificates or letters.

1.63 The Returning Officers and their staff in Bromley and Gosport told us that if the list of acceptable identification was reduced they would expect the number of applications for certificates and letters to increase. They had some concerns about the pressure this could put on an already stretched elections team. This was particularly true for Gosport which, as a smaller authority, has less flexibility in the size of the elections team and their ability to draw on resources from elsewhere in the council.

1.64 One particular issue which the pilots in 2018 were ready to test was how to ensure privacy for voters who show photo identification but need to remove, for example, a head scarf to allow polling station staff to confirm their identity.

1.65 However, several of the pilot areas do not have significant British Asian populations. In Woking, which does have a significant Asian or British Asian population, no-one requested to show their identification in private. In Watford, where some wards also have a significant British Asian population, the availability of poll cards as part of the identification requirement meant that people may have been less likely to need to use this facility. Ensuring voters have the privacy they need could be a more significant administrative challenge in some areas and that should be a consideration for future testing.

Impact on public confidence

1.66 There is some evidence to suggest that requiring voters to show identification had a positive impact on public confidence in the May 2018 elections:

- People in areas where the pilot schemes took place were less likely to think that electoral fraud took place at the May polls than those in other areas where elections were also held in May 2018.
- Across the pilot areas as a whole people were more likely to say they thought electoral fraud was not a problem than they were in January 2018.
- People who voted in polling stations in the pilot scheme areas, and therefore experienced the process of showing identification, were more confident in the security of the voting system than non-voters in those areas.

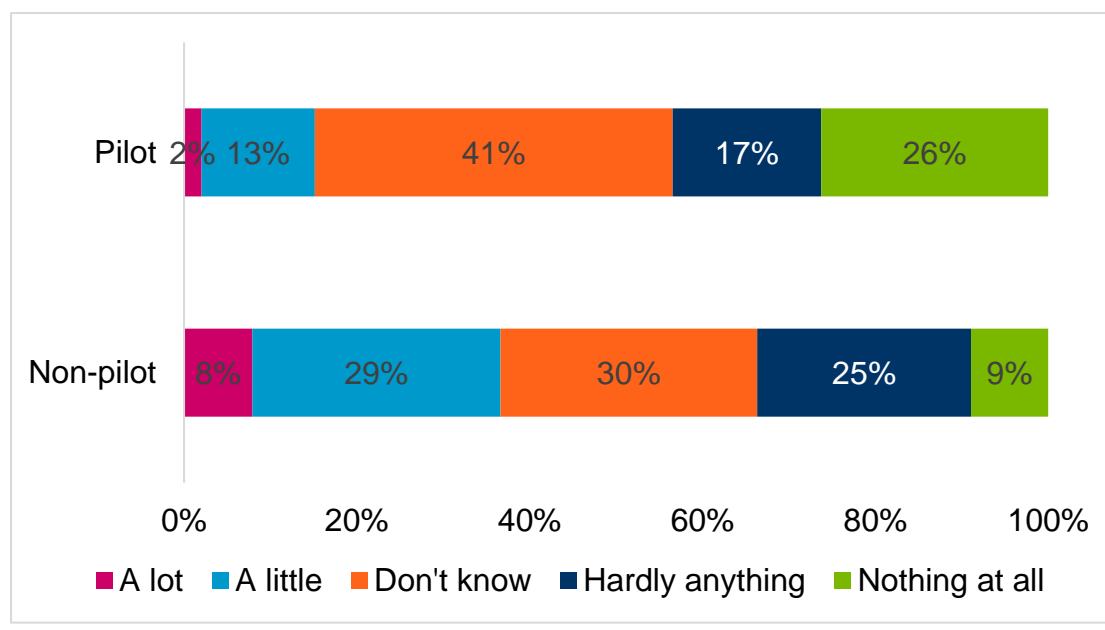
1.67 However, this picture is not consistent within the individual pilot areas and there is evidence that wider local circumstances also have an impact.

Overall findings from the pilot schemes

Perceptions of electoral fraud

1.68 People in the pilot scheme areas were significantly less likely than those in other areas with elections in May 2018 to say that fraud took place at the elections.

Chart 2: How much electoral fraud or abuse, if any, do you think took place at the 3rd May elections?¹⁰



1.69 Our research also showed that in the pilot scheme areas there was a notable increase in the proportion of respondents saying that electoral fraud was not a problem between January and May 2018 (24% compared with 42%). At the same time, fewer people saw it as a serious problem (19% compared with 9%).

1.70 This significant change in views between before and after polling day was not seen in other areas with elections in May 2018. In these areas the number of people who thought that electoral fraud was not a problem remained broadly consistent between January and May (37% compared with 33%). This was also the case for people who thought that electoral fraud was a problem (24% compared with 29%).

1.71 The extent to which people’s views about electoral fraud changed between before and after polling day also varied by individual pilot areas. People in Bromley and Watford were significantly more likely to say that electoral fraud was not a problem after polling day than before (increasing from 21% to 57% in Bromley and 34% to 57% in Watford). In the other three areas there was only a small increase in the proportion who said electoral fraud was not a problem.

1.72 There is some evidence to suggest that local circumstances may affect the changes we can see in these surveys. For example, in our January survey, out of the five pilot scheme areas, people living in Woking were much more likely to say that they thought that electoral fraud was a problem than in

¹⁰ Source: GfK Social and Strategic Research for The Electoral Commission: *Public opinion surveys 2018*. Base (unweighted) Pilot (663), Non-pilot (1000).

the other areas. This could reflect relatively recent high profile cases of electoral fraud in Woking.

Perceptions of voting in polling stations being safe from fraud and abuse

1.73 The proportion of people in the pilot scheme areas saying that voting in polling stations was safe from fraud and abuse did not change significantly between January and May 2018 (90% and 86%).¹¹ Across the pilot areas as a whole, the strength of confidence did increase between January and May: the proportion of people saying it was very safe increased from 43% to 57%.

1.74 There was no evidence of a similar change in the other areas with elections in May 2018, which suggests some effect from the pilots. However, it is worth noting that we did not find this increase in Watford either, where the proportion saying that voting in a polling station is very safe from fraud and abuse fell between January and May 2018.

1.75 Our survey results also show that people who voted in the pilot areas, and therefore experienced showing their identification, were more likely to say voting in a polling station was very safe from fraud and abuse than those who didn't vote (64% compared with 43%).

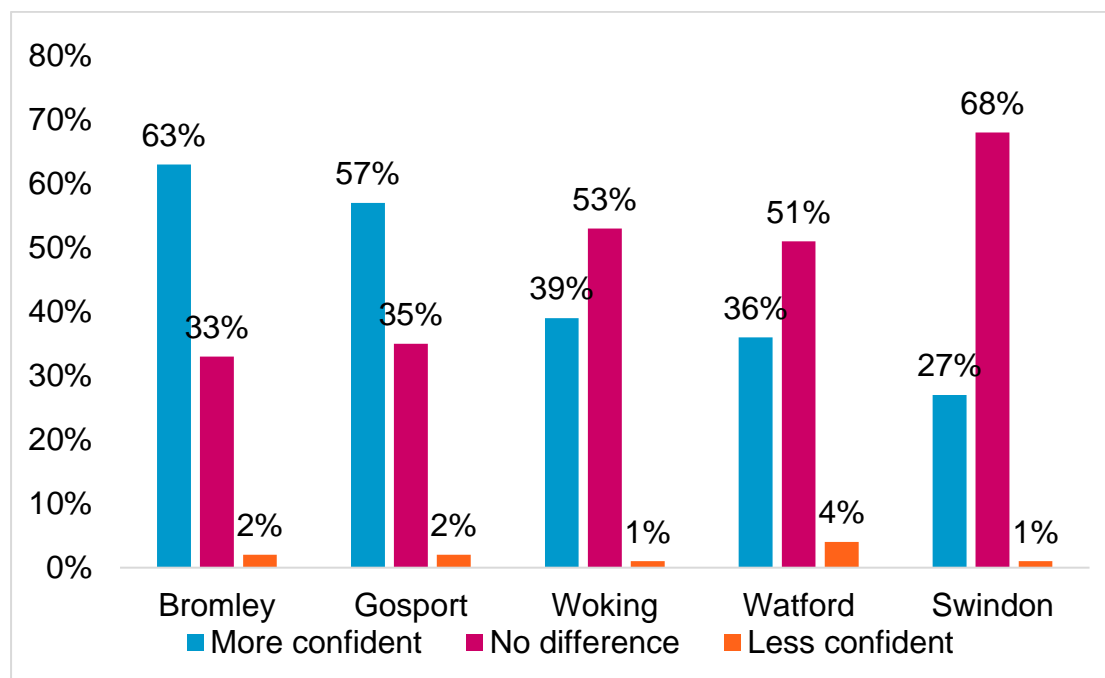
Overall impact of an identification requirement

1.76 There is inconsistent evidence from the May 2018 pilot schemes about whether a requirement to show identification at polling stations in Great Britain would improve confidence in the security of the voting system overall.

1.77 There were some significant differences between the pilot scheme areas. A majority of people in Bromley (63%) and Gosport (57%) said that an identification requirement would make them more confident in the security of the voting system. In the other three areas a majority of people said it would make no difference, although around a third of people did say it would make them more confident.

¹¹ This difference is not statistically significant.

Chart 3: Would a requirement to show identification at polling stations make you more or less confident in the security of the voting system, or no difference?¹²



1.78 The experience of showing identification may have had a positive effect on levels of public confidence. People who voted in polling stations in pilot areas were more likely than those who didn't vote to say that the requirement to show identification would make them more confident in the security of the voting system (52% compared with 37%).

1.79 Forty seven per cent of people in the pilot scheme areas thought that a requirement to show identification would make them feel more confident in the security of the voting system, and 62% thought this in the other areas where there were elections in May 2018.

Beyond the pilots: the impact on public confidence at future elections

1.80 The evidence from the pilot schemes suggests that showing identification in polling stations may have had some positive impact on the level of public confidence in the security of the system. Overall, however, the evidence is mixed as the impact was not consistent across all of the pilot areas.

1.81 It is worth noting again the impact of the relatively low levels of engagement with local elections. As set out above, voters who engaged with

¹² Source: GfK Social and Strategic Research for The Electoral Commission: *Public opinion surveys 2018*. Base (unweighted) Bromley (129), Gosport (138), Woking (131), Watford (131), Swindon (134).

the election were more likely to be more confident than non-voters and it may be that any potential impact on confidence from an identification requirement is limited when turnout at polling stations is low.

1.82 Further work, including in future pilot schemes, would be needed to help the Government and Returning Officers better understand any connection between a voter identification requirement and public confidence in the election.

Impact on security

1.83 There is very limited evidence from the May 2018 pilot schemes about whether the identification requirement had a direct impact on the security of election procedures. In particular, it is not possible to evaluate whether the requirements actually prevented attempts to commit electoral fraud at elections.

Overall findings from the pilot schemes

1.84 In the areas where the pilot schemes took place, the local police forces have told us that there were no complaints about electoral fraud at polling stations for the May 2018 elections. However, it is not possible to assess whether the identification requirement prevented any actual attempts to commit impersonation fraud.

1.85 In other areas where elections took place in May 2018 there were three complaints about electoral fraud taking place at polling stations. The police forces for those areas told us that they have investigated two of these cases but they did not need to take any further action. They are still investigating the other case.

1.86 There is no direct evidence to suggest that this difference was because of the identification requirements in areas where pilot schemes took place.

1.87 However, the pilot scheme requirements did introduce new identification checks where there have previously been no checks. Because of this, we can conclude that the pilot scheme requirements are likely to have had some positive impact on reducing the **potential** for electoral fraud by impersonation at polling stations.

1.88 We cannot make any assessment from the available data about the nature or extent of this impact, however. Nor can we make any assessment from the data from these pilot schemes about whether there was any difference in the impact on security between the different requirements in each of the pilot scheme areas.

Beyond the pilots: the impact on security at future elections

1.89 Further pilot schemes may not help to provide more robust evidence about the impact of an identification requirement on the security of future elections. This is because it is not possible to evaluate whether the requirements actually prevented attempts to commit electoral fraud at elections.

1.90 However, more work should be carried out before any further pilot schemes to further assess the relative security of different approaches to checking the identity of voters. It would be particularly useful to gather more evidence on the levels of assurance about someone's identity provided by different types of documents.

1.91 For example, the security of different types of identification documents needs to be balanced against the availability of those forms of identification. This balance should be considered further before future pilot schemes and any decision to implement a voter identification requirement in Great Britain.

Our recommendations

1.92 When the UK Government invited local councils to run voter identification pilot schemes in May 2018, it also said that it was open to looking at further piloting in future elections.

1.93 We agree that it would be helpful to collect more evidence from further pilot schemes at elections in 2019. This will help the Government and Parliament to decide whether or not to introduce an identification requirement for future elections, and how any such requirement should be designed.

1.94 This first round of pilots has shown that there could be several different ways of delivering a voter identification scheme in Great Britain. It is right that the Government should now focus on the detail of what further evidence they need, and how the design of future pilot schemes will help to provide that evidence.

1.95 We have some limited evidence from these pilots that younger people and those who don't always vote were less likely to say that they would find it easy to show identification. We think that more work is needed to look at evidence about the impact of different schemes on these people, and to identify what additional steps can be taken to minimise the risk that they are not able to vote in future.

1.96 We have identified some important lessons from the 2018 pilot schemes in this report and we have set out our recommendations for further work and future pilot schemes below. These recommendations would help provide the

best possible evidence base for any decisions about identification requirements for voters at polling stations in Great Britain in the future.

Recommendation 1: The UK Government should ensure that a wider range of local councils run pilot schemes in May 2019

These should include a mixture of rural and urban areas, and areas with different demographic profiles. This would help make sure there is more evidence about the impact of voter identification requirements on different groups of people.

Recommendation 2: The UK Government should set out more specifically how pilot schemes in May 2019 should be designed and run

The Government should take a stronger role in setting the design of pilot schemes in 2019, instead of allowing Returning Officers as much flexibility to design their own schemes as in 2018. This would help to make sure there is a good range of evidence to test the impact of different options in different parts of England. Too many different schemes will make it harder to identify the impact of requirements on different groups of people.

Recommendation 3: The UK Government and Returning Officers should work with the Equality and Human Rights Commission and organisations that represent people with different needs to carry out robust Equality Impact Assessments for future pilot schemes

This would help to make sure that the Government and Returning Officers think carefully about the potential impact of different voter identification requirements for different groups of people. It would also help Returning Officers to identify the most effective ways to communicate the requirements to different groups of people in their areas.

Recommendation 4: Future pilot schemes should continue to include options for people who don't have any of the required forms of identification

This will make sure that no-one who is eligible is prevented from voting because they don't have the right identification. Although only a small number of people in the 2018 pilot schemes used alternative options, it will still be important to offer these or similar options in future pilot schemes. It will also be important to promote these options more widely and to test the practical impact if they are used by larger numbers of voters.

Recommendation 5: The UK Government should carry out further work to identify what kinds of alternative identification are available for people who would find it harder to show their passport, driving licence

or travel pass, particularly people with protected characteristics as defined by the Equality Act

Most voters in the 2018 pilot schemes that required either photo or non-photo identification were able to show their passport, driving licence or travel card, but some groups of people are less likely to have these documents. Further work, which could include research as well as more pilot schemes, should look at whether these groups in particular would find it helpful to show other types of identification, and should also look at the impact on polling station staff.

Recommendation 6: The UK Government should carry out further work to gather more evidence on the levels of identity assurance provided by different types of documents

This would help the Government and Parliament to assess the relative security benefits of different types of identification, and consider those against the potential impact on voters.

Recommendation 7: The UK Government should carry out further work to establish whether poll cards could be included as acceptable identification without needing scanning technology in polling stations

This would help to establish whether this could be a cost-effective and affordable part of a future identification scheme. The pilot schemes in Swindon and Watford were significantly more expensive than those in Bromley, Gosport and Woking. This was because of the extra cost of the scanners and technology that staff used in the polling stations. Further work, which could include more pilot schemes, should explore whether it would be possible to check poll cards without using such expensive technology.

Appendix A: Summary of identification requirements

Bromley

Voters in Bromley had to take either one piece of photo identification or two pieces of non-photo identification to be able to vote at their polling station.

Photo identification

- a passport issued by the United Kingdom, a Commonwealth country or a member state of the European Union
- a photocard driving licence (including a provisional licence) issued in the United Kingdom or by a Crown Dependency, or by a member State of the European Union
- an electoral identity card issued under section 13C (electoral identity card: Northern Ireland) of the Representation of the People Act 1983
- a biometric immigration document issued in the United Kingdom in accordance with regulations made under section 5 of the UK Borders Act 2007
- an identity card issued in the European Economic Area
- an Oyster 60+ London Pass
- a Freedom Pass (London)
- a PASS scheme card (national proof of age standards scheme)

Non-photo identification

- a valid bank or building society debit card or credit card
- a poll card for the poll
- a driving licence (including a provisional licence) which is not in the form of a photocard.
- a birth certificate
- a marriage or civil partnership certificate
- an adoption certificate
- a firearms certificate granted under the Firearms Act 1968
- the record of a decision on bail made in respect of the voter in accordance with section 5(1) of the Bail Act 1976
- a bank or building society cheque book
- a mortgage statement dated within 3 months of the date of the poll
- a bank or building society statement dated within 3 months of the date of the poll
- a credit card statement dated within 3 months of the date of the poll
- a utility bill dated within 3 months of the date of the poll
- a council tax demand letter or statement dated within 12 months of the date of the poll
- a Form P45 or Form P60 dated within 12 months of the date of the poll

People in Bromley who did not have any of the identification listed above could apply to the Returning Officer for a Certificate of Identity which could be shown to vote at their polling station.

Gosport

Voters in Gosport had to take either one piece of photo identification or two pieces of non-photo identification to be able to vote at their polling station.

Photo identification

- UK or EU passport (UK, Commonwealth, EEA)
- photocard driving licence, full or provisional (UK, crown dependency or EU)
- Northern Ireland electoral identity card
- biometric immigration document
- European Economic Area identity card
- Disclosure and Barring Service certificate showing your registered address
- MoD photographic identification card
- MoD Defence Privilege Card
- photo bus/travel pass from any Hampshire council

Non-photo identification

- driving licence without photo
- birth certificate
- adoption certificate
- marriage or civil partnership certificate
- bank or building society debit/credit card

Non-photo identification issued within 12 months of voting day:

- financial statement, such as a bank or mortgage statement
- council tax demand letter or statement
- utility bill
- P2, P6, P9, P45 or P60
- statement of benefits or entitlement to benefits

People in Gosport who did not have any of the identification listed above could apply to the Returning Officer for an Electoral Identity Letter which could be shown to vote at their polling station.

Swindon

Poll card

Voters in Swindon had to take their poll card to be able to vote at their polling station.

Photo identification

Voters who had lost their poll card or did not take it with them to the polling station could show one piece of photo identification:

- Passport (UK, EU, Commonwealth) (can be expired or unexpired)
- Photocard driving licence including a provisional licence (UK, Crown Dependency or EU)
- Northern Ireland Electoral Identity Card
- Biometric Immigration Document
- EEA Identity Card

Attestation

People in Swindon who did not have any of the identification listed above could bring someone with them to their polling station to confirm who they were. This person had to be registered to vote at the same polling station and have already voted themselves or could vote by showing their poll card or other form of identification.

Watford

Poll card

Voters in Watford had to take their poll card to be able to vote at their polling station.

If someone lost their poll card or forgot to bring it with them to the polling station they could show:

- Valid British, European or Commonwealth passport
- UK or EU photo-card driving licence (full or provisional)
- Valid credit or debit card
- Biometric Residence Permit
- EEA Identity Card
- Northern Ireland Electoral Identity Card

Woking

Voters in Woking had to take one of the following types of photo identification to be able to vote at their polling station.

- Passport (UK, EU, Commonwealth)
- UK Photo Driver's Licence (full or provisional)
- EU Driver's Licence
- European Economic Area photographic identification card
- UK Biometric Residence Permit
- Northern Ireland Electoral Identity Card
- Surrey Senior Bus Pass
- Surrey Disabled People's Bus Pass

- Surrey Student Fare Card
- 16 - 25 Railcard
- Rail Season Ticket Photocard

People in Woking who did not have any of the identification listed above could apply to the Returning Officer to be issued with a photographic Local Elector Card.

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