



Report on performance standards for Returning Officers in Great Britain

European Parliamentary elections 2009

Translations and other formats

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Summary

We want people who are entitled to vote to be confident that voting is as straightforward, accessible and secure as possible. We also want them to receive a consistently high-quality service wherever they live. It is the responsibility of Returning Officers (ROs) across Great Britain to provide this high-quality service.

The Electoral Commission's role is to monitor performance through our performance standards framework, to highlight where elections are well run and to challenge ROs where the service received by electors is below standard. We provide support and guidance to enable improvements in electoral practice.

This report is our first assessment of ROs' performance against a series of standards published in March 2009. This is the first time that information about the performance of ROs has been collected, analysed and made available across Great Britain.

The performance standards framework

Seven performance standards were developed following extensive consultation with practitioners and stakeholders, drawing on a baseline data collection and analysis exercise conducted after the England and Wales local government and Greater London Authority elections in May 2008. The standards are grouped into three subject areas representing the most important areas that ROs should focus on to ensure elections are well run.

- Planning and organisation (standards 1–3)
- Integrity (standard 4)
- Participation (standards 5–7)

ROs were asked to assess their own performance against each of the seven standards, following the European Parliamentary elections held across Great Britain in June 2009. We received returns from all 378 ROs in Great Britain.

ROs assessed their performance against clear guidelines set by the Commission and were subject to a significant level of checking to ensure that the assessments were consistent and accurate. The process was broadly in line with other self-assessment frameworks used across the public sector.

Performance against the standards

Overall the first self-assessment against the standards paints a positive picture of performance by ROs across Great Britain, but it also points to areas where improvements need to be made before the United Kingdom Parliamentary general election in 2010.

- Nearly all ROs (just over 96%) either met or exceeded the first standard relating to *Skills and knowledge of the Returning Officer*.
- The majority (just over 90%) of ROs met or exceeded all three of the standards relating to 'Planning and organisation' ('Skills and knowledge of the Returning Officer', 'Planning' and 'Training').
- The majority (over three quarters) of ROs met or exceeded standard 4: 'Integrity'. However one in five ROs said that they did not meet this standard, the highest proportion of all the seven standards. This is an area that ROs need to improve before the next set of elections.
- Just over three quarters of ROs met or exceeded all three standards in the 'Participation' area.
- The main reason for performing 'Below the standard' was the lack of formalised planning procedure. This was most apparent for standard 4: 'Integrity' and standard 7: 'Public awareness'. This was an area for improvement identified in our analysis of performance of Electoral Registration Officers (EROs).

Following our analysis of the performance of EROs earlier this year, there is still a lack of written documented plans for election processes, although to a far lesser extent than was found for EROs. Our discussions with ROs, EROs and electoral services managers over the last year also suggest that ROs adopt a more 'hands on' approach to election planning than EROs apply to registration planning, due primarily to the high profile and public nature of the role. Although it is encouraging that ROs ensure they have the correct procedures and documentation in place to carry out a successful election, a similar approach should also be carried out for registration processes.

We have been encouraged both by the overall level of performance against the standards, and by the willingness of ROs and their teams to use the performance standards framework as a basis for continued improvement. However there are still areas which require immediate improvement and we will issue specific guidance to ROs on what they need to do in order to meet the standards, starting with the UK Parliamentary general election and beyond, focusing specifically on work relating to integrity, participation and planning. We have already started this work by publishing templates for ROs to use to enable them to meet the minimum requirements of the standards. We look forward to working with ROs to support continued improvements in performance.

Information about the performance of individual ROs is available on our website, where anyone can review performance against the standards in an accessible chart-based format. This tool also enables comparison of performance with ROs for other local authorities, and in future will allow

comparison with past performance. This information can be found on our website at www.electoralcommission.org.uk/performance-standards.

1 Introduction

1.1 The Electoral Commission is an independent body set up by the UK Parliament under the Political Parties, Elections and Referendums Act 2000 (PPERA). Our aim is to ensure integrity and public confidence in the democratic process. Our corporate plan sets out our strategic direction over the five years from April 2009. Our four core objectives are:

- integrity and transparency of party and election finance
- complete and accurate electoral registers supported by a well-run electoral registration process
- well-run elections and referendums which produce results that are accepted
- fair boundary arrangements for elections in England

1.2 We want people who are entitled to vote to be confident that voting is as straightforward, accessible and secure as possible. We also want them to receive a consistently high-quality service wherever they live. It is the responsibility of Returning Officers (ROs) across Great Britain to provide this high-quality service.

1.3 Our role is to monitor performance through our performance standards framework, to highlight where elections are well run and to challenge ROs where the service received by electors is below standard. We provide support and guidance to enable improvements in electoral practice.

1.4 The Electoral Administration Act 2006 (EAA) amended PERA¹ to give us powers to set standards of performance for ROs, Electoral Registration Officers (EROs) and Referendum Counting Officers in Great Britain.² Under these provisions, we may:

- determine and publish standards of performance for relevant electoral officers in Great Britain (ROs, EROs and Referendum Counting Officers)
- direct relevant officers to provide us with reports regarding their performance against the published standards
- publish our assessment of the level of performance by relevant officers against the published standards

The role of the Returning Officer

1.5 Central to the successful delivery of any election are the many individuals who are responsible for planning and managing the administration of postal voting, polling stations and count centres. At the June 2009 elections this included Regional Returning Officers (RROs), Local Returning Officers (LROs), EROs and electoral administrators across the UK.

¹ Sections 9A and 9B, PERA, as amended by Section 67 EAA.

² The performance standards provisions introduced by the EAA do not apply in Northern Ireland or local government elections in Scotland.

1.6 European Parliamentary elections are complicated because of the extent of the coverage of the electorate, but they are the most coordinated and administered. They are run using the simplest management structure in which the RRO is responsible for their region and the LROs deliver. LROs are responsible for most aspects of delivery in their own area. Consequently planning and management assumes even greater importance.

1.7 RROs were responsible for the overall management of the European Parliament election within each electoral region. They were specifically responsible for receiving nominations from political parties and independent candidates, determining the form of the ballot paper and for collating the election results from across the region before declaring the result and the candidates elected for the electoral region.

1.8 For each local authority in England and Scotland, and each Parliamentary constituency in Wales, the delivery of the elections was the responsibility of the LRO. Their key functions included publishing the notice of election as directed by the RRO; the conduct of the poll, including the issue and receipt of postal votes and the printing of ballot papers; and the verification of ballot papers and the count. In Northern Ireland, the Chief Electoral Officer as RO was responsible for the overall conduct of the European Parliamentary election, and was supported by eight Deputy Returning Officers.

1.9 The Representation of the People Act 1983 sets out the responsibilities of the RROs and LROs in conducting the election. We published guidance to both RROs and LROs. RROs have powers in each region to direct LROs in relation to the discharge of their functions. LROs were under a duty to comply with whatever directions they received.

Performance standards for Returning Officers

1.10 On 16 March 2009 we published performance standards for ROs. The standards were developed after extensive consultation with government departments, specifically the Ministry of Justice and Communities and Local Government, local authorities, electoral administrators and other organisations such as the Association of Electoral Administrators, the Society of Local Authority Chief Executives and Scope. Following the English local government and Greater London Authority elections in May 2008, we also carried out a baseline survey of all ROs which provided an initial picture of performance and supported the development of the final standards.

1.11 The seven performance standards for ROs are grouped within three broad subject areas: 'Planning and organisation' (standards 1–3); 'Integrity' (standard 4); 'Participation' (standards 5-7). The standards are outlined in detail in Chapter 3.

1.12 We have been pleased with the positive and constructive way in which electoral administration professionals have engaged with us during the development of these standards, and we are confident that the standards are supported and valued across the profession.

1.13 Prior to the development of this performance standards framework, information on the performance of ROs had not been collected or analysed consistently nationwide, and there was no mechanism available to assess the performance of ROs. By setting these standards, we are now able to collect performance information from ROs in order to assess progress against the key objective of well-run elections. ROs will be able to compare their performance with other officers across Great Britain and in future be able to share areas of good practice to improve the processes involved in carrying out an election.

1.14 This report provides our first analysis of ROs' performance against the standards. Information about performance across England, Scotland and Wales is provided in Chapter 3, and a more detailed analysis of the three subject areas can be found in Appendices A–C.

1.15 Information about the performance of individual ROs is also available on our website, where anyone can review performance against the standards in an accessible chart-based format. This tool also enables comparison of performance with officers for other local authorities, and in future will allow comparison with past performance. This information can be found on our website at www.electoralcommission.org.uk/performance-standards.

Request for information from Returning Officers

1.16 On 16 March 2009 we issued a circular, directing ROs³ to make an assessment of their performance against the seven performance standards. The direction was to all Local Returning Officers (LROs) at European Parliamentary elections in Great Britain and Deputy Returning Officers at county council elections in Great Britain. LROs who were also DROs at county council elections in England were asked to complete the performance return once only and, where appropriate, make a distinction between roles using the free-text box.

1.17 We also published guidance to assist the completion of these forms (Part I – Managing a European Parliamentary election in Great Britain). We also invited the officers to provide commentary or further information to support their performance returns.

1.18 This is the first collection of performance returns against the standards from ROs. The deadline for submission was 26 June 2009. We received performance assessments from all 378 LROs in Great Britain, ensuring that the analysis was based on a complete set of information.

1.19 During the development of our performance standards framework, some practitioners and other bodies raised concerns about the additional burden that the standards assessment would have on ROs and their staff. Having concluded this first exercise, we are confident that the exercise did not represent a significant or undue administrative burden, although we recognise

³ EC05/2009, Direction to Report under Section 9B (1) PPERA 2000 – Performance Standards for ROs in GB.

that our performance framework is likely to involve some time and effort on the part of ROs. Officers who already had the necessary plans and procedures in place said that they had less difficulty assembling the evidence.

1.20 We have been encouraged by the willingness of ROs and their teams to use the performance standards framework as a basis for continued improvement.

Verification of self assessments

1.21 After receiving performance returns from ROs, we undertook a sample-based verification exercise to ensure that the performance return had been completed accurately and consistently across Great Britain. The self-assessment and sample verification approach is one which has been used in other public sector performance frameworks, including the Audit Commission's Comprehensive Performance Assessment and new Comprehensive Area Assessment frameworks for local government in England. During the verification process we examined the evidence which supported an RO's performance return and judged it against the criteria in our guidance.

1.22 In order to assess the RO fully, and ensure that the assessment process was as robust as possible, we met a number of ROs to discuss their performance and looked at the relevant evidence used to justify the return. For performance standard one, we met a quarter of all ROs (95 in total) across Great Britain. For the remaining standards we asked a further 62 ROs across Great Britain to submit evidence to us, which we then reviewed. If we decided that the evidence was not sufficient to support the assessment, we either asked for further evidence to be submitted or arranged a visit to discuss the assessment further.

1.23 In a small number of cases (17), we asked ROs to reconsider their assessments on the grounds that they did not appear to meet the criteria suggested in our guidance and had either been assessed too high or too low. Of these, 15 ROs agreed to move their initial assessment up a level, while the remaining two agreed to downgrade their assessment.

1.24 Carrying out the verification process in this way has served three distinct purposes. Firstly and most importantly, as this was the first time that the Commission had requested assessments against the standards, we were able to ensure that ROs completed the forms consistently. Secondly, we were able to check whether the guidance we provided was sufficient for officers to complete their assessments. Finally, we have started to identify evidence and documentation that might provide the basis for 'good practice' advice, which in due course can be shared with other ROs.

Using this performance information

1.25 The information that we have collected has been analysed to identify where performance could be improved, and to help support ROs. In order to

use the information that we have collected effectively, we intend to undertake more detailed follow-up analysis on specific issues as we continue the development of our performance standards framework.

1.26 The seven performance standards for ROs are divided into three distinct subject areas, which should be considered alongside one another to provide a full picture of performance.

1.27 During the development of these standards, we decided against developing a single composite measure of performance (similar to the 'star' ratings used in other frameworks) to maintain transparency and simplicity, and avoid the use of complicated formulae. Aggregating the total number of standards not met, met, or exceeded across all seven standards may not give an accurate picture of performance. The analyses in Chapters 2 and 3 show that performance varies across all three subject areas for a number of reasons.

2 Performance against the standards

2.1 The performance standards are grouped into three subject areas representing the most important areas that Returning Officers (ROs) should focus on to maintain a well-run election.

Table 1: Performance standards for ROs in Great Britain

Subject area	Performance standards
Planning and organisation	PS1. Skills and knowledge of the Returning Officer PS2. Planning processes in place for an election PS3. Training
Integrity	PS4. Maintaining the integrity of an election
Participation	PS5. Planning and delivering public awareness activity PS6. Accessibility of information to electors PS7. Communication of information to candidates and agents

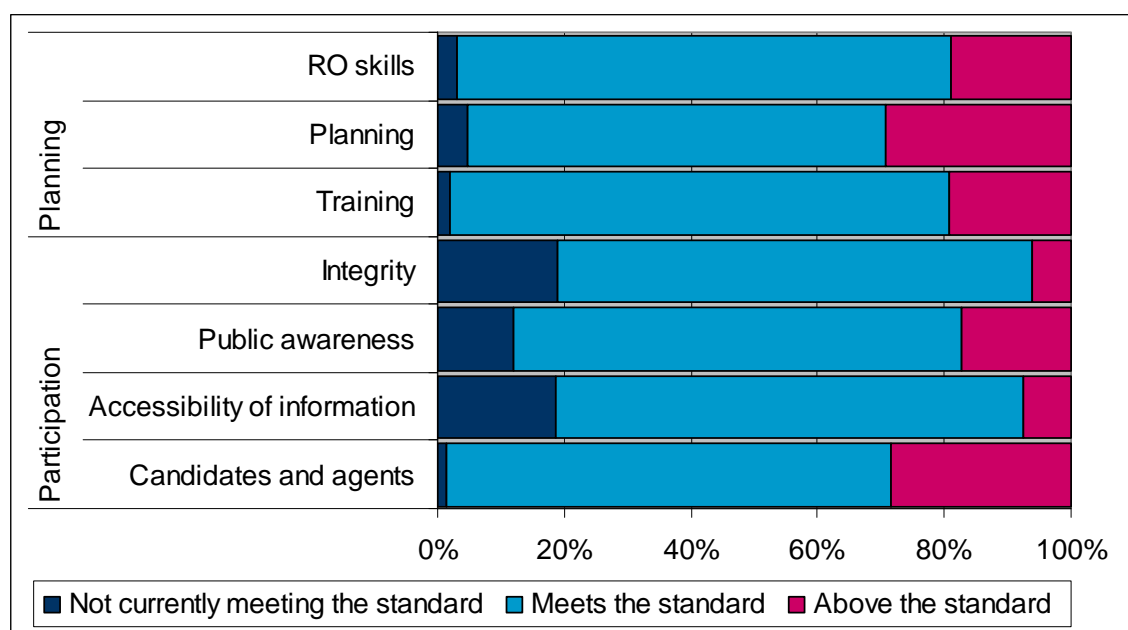
2.2 ROs were asked to assess themselves according to three different categories: 'Not currently meeting the standard', 'Performance standard', and 'Above the performance standard'. For standards 3 and 4 there are two levels of performance in the 'Not currently meeting the standard' section, and for standard 5, two levels of performance in the 'Above the standard' section.

2.3 Within the 'Not currently meeting the standard' section, the lower level indicates that the officer does not carry out any activities towards meeting the standard, while the second level indicates that some of the activities we would expect are being carried out, but not sufficiently to meet the standard. For the purpose of the analysis which follows, we have used only the three categories of performance ('Not currently meeting the standard', 'Performance standard', and 'Above the performance standard'), and have not illustrated findings relating to the levels within each category.

Summary of performance across Great Britain

2.4 The overall performance of ROs in Great Britain is illustrated in Chart 1, which shows the proportion of officers who meet each standard. The key findings and analysis are outlined in more detail in the remainder of this report.

Chart 1: Performance of ROs in Great Britain



2.5 Our analysis of the performance standards assessments has identified these key findings:

- Just over 90% of ROs met all three of the standards in the Planning and organisation subject area.
- ROs are more likely to have formal planning processes in place for elections as opposed to the registration process.
- Just over three quarters of ROs met all standards in the participation subject area.
- Some ROs are lacking formal documentation in relation to integrity and public awareness and are not providing a simple and user friendly way for electors to access information.
- One in five ROs assessed themselves below the integrity standard. This was primarily due to the lack of a written plan to tackle instances of electoral malpractice.
- There are still a significant number of officers who do not have plans in place for public awareness activities, an area that was also highlighted in the Electoral Registration Officer (ERO) performance standards analysis.

2.6 The majority of ROs meet or exceed all three of the standards in the first subject area relating to planning and organisation ('Skills and knowledge', 'Planning', 'Training'). Only one RO failed to meet all three standards in this area. However, performance across the other two subject areas is more varied, with a particular weakness showing in standard 4: 'Maintaining the integrity of an election' and Standard 6: 'Accessibility of information to electors'.

2.7 The most common explanations given by ROs who have not met performance standard 4: 'Integrity' was the lack of a written plan; however

there were a very small minority who said they had difficulty engaging with their Police service contact (Single point of contact (SPOC)).

2.8 The majority of officers met all the standards in the participation area, but overall this was the poorest performing subject area. There were a number of reasons given for not meeting performance standard 5: 'Public awareness', although the main reason was the lack of a documented public awareness strategy.

2.9 On 17 September 2009 we issued Circular EC20/2009 – Essentials of effective election management: Planning for a UK Parliamentary general election. This Circular highlighted the publication of election planning templates, which have been developed to support ROs in working towards meeting those performance standards that require plans to be provided as evidence of meeting the standard. In addition to this, we plan to work with ROs who do not currently meet these standards to work on areas to be improved prior to the UK Parliamentary general election.

Planning and organisation

2.10 This subject area includes the first three performance standards which cover the planning and organisation skills of the RO. Performance against each of these three standards was strong:

- nearly all ROs (just over 96%) said that they met or exceeded standard 1: 'Skills and knowledge of the Returning Officer', with a fifth of these saying they exceed the standard.
- similarly, nearly all ROs met or exceeded standard 2: 'Planning' and standard 3: 'Training' (95% and just under 98% respectively)
- only one RO assessed themselves below all three of the standards in this area

2.11 Running an effective election is a major logistical project involving both permanent and temporary staff from both inside and outside the local authority; outsourcing and contract management of IT equipment and printers as well as security and media handling carried out under severe time constraints (one day). Therefore planning is of the utmost importance. It is, therefore, encouraging that the majority (90%) of ROs across Great Britain either say they meet or perform above all three standards in this subject area.

2.12 However, there are still 35 ROs who did not meet one or more of the three standards in this subject area, and one officer who did not meet any of the three standards.

2.13 Nearly all ROs met or exceeded standard 1: 'Skills and knowledge' with a very small number (12) assessing themselves below the standard. As part of our verification process Commission representatives met 95 ROs across Great Britain to ensure their assessment was accurate. Of these, we recommended 6 ROs amend their assessment to a higher level as they had met the criteria we had outlined.

2.14 Just over 95% of ROs assessed themselves at or above standard 2: 'Planning' with just under a third of these being 'Above the standard', the highest proportion of all seven standards. This is in contrast to our findings on the performance standards for EROs where on the equivalent standard although over three quarters said that they met the standard, over a fifth across Great Britain said they were below. The main reason given was the lack of a documented plan.

2.15 A higher proportion of ROs reported that they met or exceeded standard 3: 'Training', than the other two standards in this subject area. A small minority (10) of ROs across Great Britain said that they were 'Below the standard' and thereby provided only basic training for permanent members of staff only to ensure awareness and understanding of legislative requirements.

Integrity

2.16 The second subject area includes one standard which covers the processes used by ROs to ensure integrity in the election.

Although a large percentage of ROs meet standard 4: 'Maintaining integrity of an election', just under a fifth of ROs (71) said that they did not meet this standard, the highest proportion of all the 7 standards.

2.17 In common with our findings after the analysis of the ERO assessments after the 2008 annual canvass of electors⁴ (published in April 2009), a significant number of EROs failed to meet the standard relating to maintaining the integrity of registration and absent vote applications. The vast majority of those ROs who assessed themselves below this standard said that this was principally due to the lack of a formalised planning procedure.

2.18 Nearly all ROs meet the remainder of the criteria to achieve the standard, having contact with their police service single point of contact (SPOC) and ensuring that work with political parties and independent candidates is carried out. However, they fail to meet the standard because of the absence of a plan outlining what steps are to be taken to deal with concerns about electoral malpractice.

2.19 Although there were no legal challenges to the results of these elections and a relatively small number of allegations of electoral malpractice, a significant number of voters still have concerns about the safety of electoral processes from fraud and abuse. Each election brings new and different risks, and ROs in particular need to recognise the need to be able to identify and manage the risk of electoral malpractice, even in areas where historically there may be no prior track-record of allegations. Our priority is to ensure that people have confidence in the results of elections and in the integrity of electoral registration and voting processes.

⁴ Performance standards for Electoral Registration Officers in Great Britain
www.electoralcommission.org.uk/performance-standards/results_and_analysis.

Participation

2.20 The third subject area includes three standards which cover the processes used by ROs to encourage participation in the registration process. There were some variations in performance against the three standards:

- The majority of ROs (just over three-quarters) met or exceeded the participation standards. The vast majority of ROs (just under 90%) met or exceeded standard 5: 'Planning and delivering public awareness activity'.
- Just over four-fifths of ROs met or exceeded standard 6: 'Accessibility of information to electors'. However a significant number did not meet this standard (69 ROs), the second highest proportion across all seven standards.
- Nearly all officers met or exceeded standard 7: 'Communication of information to candidates and agents'.

2.21 Section 69 of the Electoral Administration Act 2006 requires that an RO must 'take such steps as he thinks appropriate to encourage the participation by electors in the electoral process in the area for which he acts'. With greater demands now being placed on officers to promote participation and a wide range of activities and media by which to do so, officers are expected to document how they intend to carry out these activities. For public awareness activities and participation issues in general, there is substantial help available through our Do Politics website. The information includes press release forms, planning templates and other resources which would help ROs to meet standard 5: 'Public awareness'. These resources are free to download from www.dopolitics.org.uk.

2.22 Slightly less than 90% of ROs across Great Britain said that they either meet or exceeded this standard. This was in direct contrast to the equivalent standard for registration where two-thirds of EROs assessed themselves 'Below the standard'. The main reason being the lack of a documented plan for public awareness activities. A similar reason was cited by the small number of ROs who said they were 'Below the standard'.

2.23 Over four-fifths of ROs in Great Britain say that they either met or exceeded standard 6: 'Accessibility', however, due to the high proportion of officers assessing themselves 'Below the standard', it is the worst performing standard within this subject area. From the verification exercise and narrative text accompanying the assessments, it appears that most ROs have in fact done some research into the demographic of the local area or identified the target audience by means of equality impact assessments or work undertaken by the local authority, but felt that this was not sufficient to meet the standards as specified in our guidance.

2.24 Nearly all officers met or exceeded standard 7: 'Candidates and agents'. The high profile and public nature of elections means that it is important to have a good relationship with both candidates and agents. Of those that assessed themselves 'Above the standard' (over a quarter of ROs) the

feedback we received showed that the majority of those evaluated their communication with candidates and agents. The main methods were actively seeking feedback from candidates and agents after the election, seeking their views on the information supplied to them and also providing them with copies of our guidance.

3 Performance in England, Scotland and Wales

3.1 This chapter provides information and analysis of trends and variations in performance by Returning Officers (ROs) between and within England, Scotland and Wales.

England

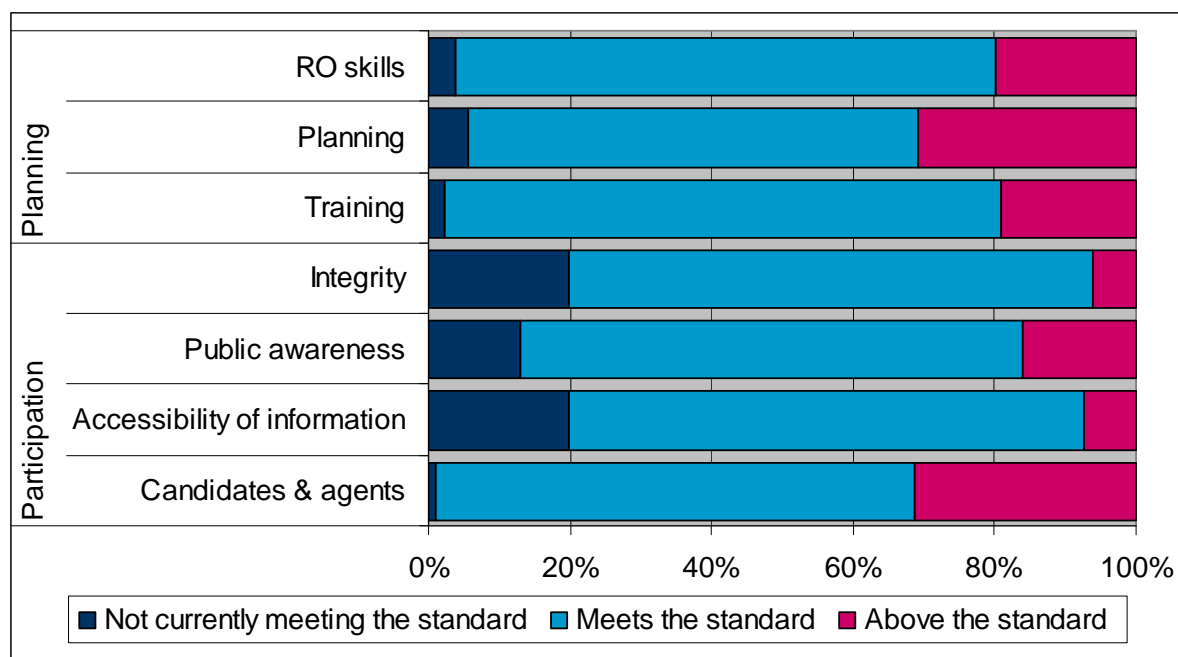
3.2 In England, the elections were administered on local authority boundaries and the Local Returning Officer was the Returning Officer for a district council, unitary authority or a London borough, or the Returning Officer for the City of London or the Isles of Scilly.

3.3 Performance against the standards by the 378 ROs in England is shown in Chart 3. The results for England are broadly similar to performance across Great Britain as a whole, which would be expected given the larger number of ROs in England compared to Scotland (32) and Wales (22). We have, therefore, not provided a comparison of performance between ROs in England and Great Britain.

3.4 Overall performance is positive, however there are some variations in performance by ROs in England between the 7 standards:

- Over 90% of ROs met all three standards within the first subject area 'Planning and organisation' while over three quarters met the last subject area 'Participation'.
- Over 95% of officers in England reported that they either met or exceeded standard 1: 'Skills and knowledge of the RO'.
- Only three ROs in England said that they did not currently meet standard 7: 'Accessibility and communication to candidates and agents' and seven ROs did not meet standard 3: 'Training'.
- However, one in five ROs in England said that they did not meet standard 4: 'Maintaining the integrity of an election' and standard 6: 'Accessibility of information to electors'.

Chart 2: Performance of ROs in England



3.5 Local authorities in England are classified according to a number of different authority types (unlike in Scotland and Wales where all councils are the same type). These are metropolitan districts, unitary authorities, London boroughs and district councils. There is some variation in the performance of ROs in different types of authorities in England. These variations and other relevant findings are outlined in more detail below. Although it may be possible to speculate about the reasons for any trends or variations in performance, we have not done so here. Nevertheless, during the coming year, we will ensure that we learn from ROs in both higher and lower performing authorities and understand what underpins their levels of performance.

Planning and organisation

Skills and knowledge of the Returning Officer

3.6 ROs in England performed strongly in relation to this standard with nearly all officers assessing themselves either 'Performance standard' or 'Above the standard'. However 12 ROs in England reported that they were 'Below the standard', the only officers to do so across Great Britain. As part of our verification process we spoke with 94 ROs to discuss their assessment and found that nearly all officers assessed themselves accurately and in accordance with the guidance supplied by the Commission

3.7 The majority of ROs across England also held the position of Chief Executive of the local authority. One of the reasons given by ROs in London for an assessment 'Above the standard' was the overall relationship between Chief Executives within London, specifically the London Chief Executive meetings where electoral issues were often discussed. Unitary councils had

the highest proportion of ROs who have assessed themselves 'Below the standard' (almost half of the total officers below the standard across Great Britain).

3.8 Those ROs who held the position of Chief Executive of the local authority also had the advantage of a regular meeting structure as well as the ability to command council resources more easily for the running of the election. However ROs who did not have the additional responsibility of acting as Chief Executive were able to have a more detailed and active involvement in planning and training for the election.

Planning and training

3.9 Performance was fairly consistent across the remaining two standards in this area and again some broad themes emerged. Overall, the performance of ROs in England was strong against standard 2: 'Planning' and standard 3 'Training'. Just under 94% of officers met or exceeded Standard 2, while 97% met or exceeded standard 3, both of which were similar to the proportions across Great Britain.

3.10 Although performance of ROs across England was fairly consistent for both standards, officers from district councils were more likely to assess themselves below standards 2 and 3. Just over 6% of officers said they were below standard 2 (representing two-thirds of the total number who assessed themselves in this way) and all 10 officers assessing themselves below standard 3 across Great Britain came from district councils. However it is important to note that the majority of local authorities in England are district councils.

3.11 ROs from Metropolitan Borough councils were less likely than officers across Great Britain as a whole to report that they did not meet standard 3 (just over 3% compared with just under 5%). ROs in London boroughs appear to have performed particularly strongly in relation to both standards with half of officers in London assessing themselves 'Above the standard' for each. As outlined above, only officers from District councils assessed themselves below standard 3: 'Training'.

Integrity

3.12 Just over 80% of ROs in England met or exceeded this standard. Compared with the performance of ROs across Great Britain as a whole, officers from district councils were less likely to report that they did not meet standard 4: 'Integrity' (just under 28%) compared with just under a fifth of officers across Great Britain. Officers from London boroughs and metropolitan districts were more likely to report that they did meet the standard, while the performance of officers from unitary authorities were consistent with that of officers across Great Britain as a whole.

Participation

3.13 There was again some variation in performance by ROs in different types of local authorities in England in relation to the three standards concerned with activities promoting participation in the European elections.

3.14 Compared with the performance of ROs across Great Britain as a whole, officers from unitary councils in England were more likely to be below in standards 5 and 6 'Public awareness' and 'Accessibility of information' to electors, while officers from London boroughs were more likely to report that they were above both these standards. Officers from metropolitan districts were more likely to report that they either did not meet, or performed above standard 7 'Communication of information to candidates and agents'.

3.15 In general, performance for standard 7: 'Candidates and agents' was strong across England with nearly all officers across all authority types saying they either met or exceeded the standard. Officers from metropolitan and London boroughs as well as district councils had higher proportions of officers reporting they performed above this standard than the Great Britain average, with officers from unitary authorities marginally below.

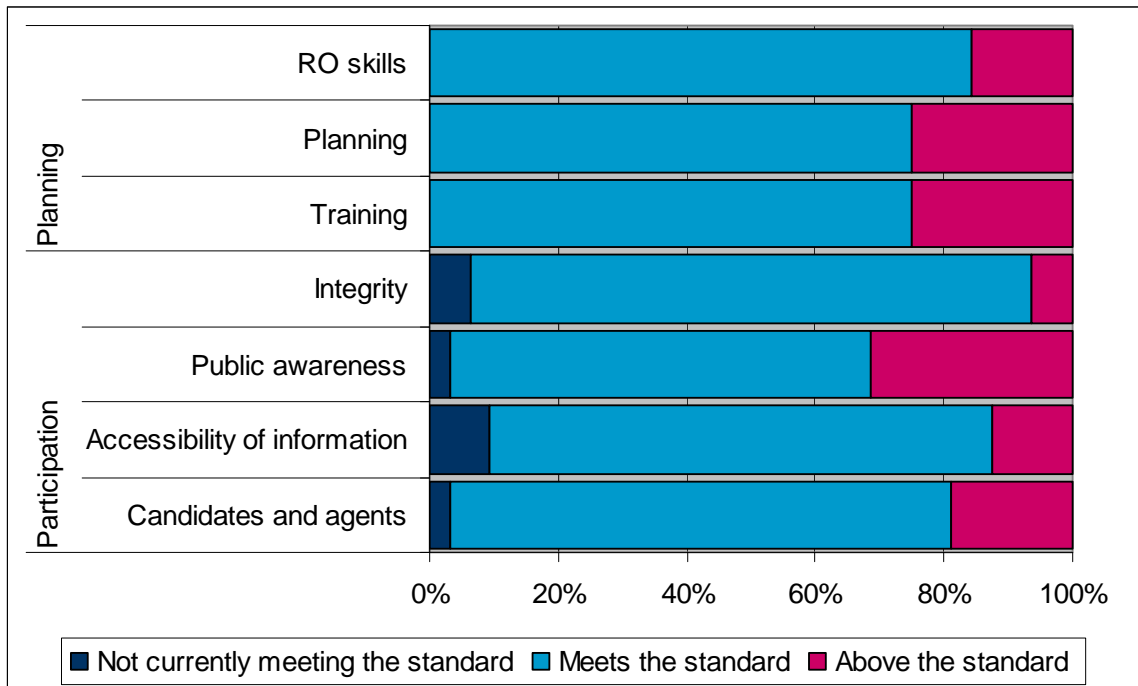
Scotland

3.16 The European Parliamentary elections in Scotland in 2009 were conducted on a local government basis through an amendment to the European Parliamentary Election Regulations 2004.

3.17 Performance against the standards by the 32 ROs in Scotland is shown in Chart 4. As is the case across Great Britain as a whole, overall performance across the seven standards by ROs in Scotland gives a positive picture:

- the ROs for all 32 Scottish councils met or exceeded the first three standards
- a quarter of ROs said they were above the standard for standard 2: 'Planning', standard 3: 'Training' and just under a third for standard 5: 'Public awareness'
- two ROs failed to meet Standard 4: Integrity and three failed to meet standard 6: Accessibility of information

Chart 3: Performance of ROs in Scotland against the standards



3.18 As a whole, ROs for Scottish councils performed strongly when compared with the performance of ROs across Great Britain: a higher proportion of officers for Scottish councils met or exceeded the standard for all the performance standards than counterparts in England and Wales.

Planning and organisation

Skills and knowledge of the Returning Officer

3.19 ROs for Scottish councils performed strongly in relation to this standard with all officers assessing themselves either at or above the standard. As part of our verification process we met with a quarter of ROs in Scotland (eight in total) to discuss their assessment. All the ROs we spoke to were Chief Executive of their local council.

3.20 Following our report on *Electoral administration in Scotland* in August 2008, the Regional Returning Officer for Scotland (RRO) established an Interim Electoral Management Board (IEMB) to provide a strategic focus for election management in Scotland.

3.21 The IEMB engaged with ROs through meetings of groups of authorities to discuss their planning for the European Parliamentary elections and other major electoral issues. The IEMB also sought to improve consistency of practice across Scotland and this was reinforced by the use of the RRO's power of direction where necessary. This structure ensured that ROs in Scotland had the necessary plans and processes in place to carry out the election, and meet the standard.

Planning and training

3.22 Performance by ROs for Scottish councils against standard 2: 'Planning' was similar to that of officers across Great Britain as a whole. Three-quarters of ROs in Scotland met the standard for planning for the European elections, and the remaining quarter reported that they exceeded the standard. There were no ROs who said they were 'Below the standard'. The assessments and verification visits indicate that all councils had a written plan for the election. Many ROs had also used an adapted version of the Commission template for risk and contingency planning to reflect local conditions.

3.23 Performance by ROs for Scottish councils against standard 3: 'Training' was also consistent with performance across Great Britain as a whole. All ROs either met or exceeded the performance standard. four ROs said they performed 'Above the standard'. Of those that assessed themselves 'Above the standard', one of the areas identified is recognising and planning for the training needs of permanent staff.

Integrity

3.24 Two ROs (just under 7%) reported that they did not currently meet standard 4: 'Maintaining the integrity of an election', however performance in Scotland compares favourably with that of officers across Great Britain as a whole. This standard had the highest number of ROs assessing themselves below the standard (19%) across Great Britain.

3.25 Feedback suggests that although informal checks and procedures were in place, the absence of a written plan was the main reason the RO assessed themselves as below standard.

3.26 We cooperated closely with the Association of Chief Police Officers in Scotland (ACPOS) and electoral administrators this year to encourage greater understanding of electoral malpractice and partnership working. We were pleased that the verification of this standard showed stronger relationships being built between police forces and ROs in Scotland and plans developed to maintain the integrity of elections.

Participation

3.27 All but one RO in Scotland said that they performed either at or above the standard for standard 5: 'Public awareness'. This is in contrast to the performance of EROs where just over half (17 out of 32) said they did not currently meet this standard. Ten ROs said they were 'Above the standard' compared to no EROs. Key issues identified through the verification process were about having a strategic approach to public awareness activity, evaluating individual activities and using that evaluation to inform planning.

3.28 The majority of ROs said that they met standard 6: 'Accessibility of information to electors', but three ROs reported that they did not (the largest number below any of the seven standards in Scotland). As a result of our verification process we have identified the need to use local demographic

information to improve access to information not only for those electors whose first language may not be English but also for those electors with different communication needs.

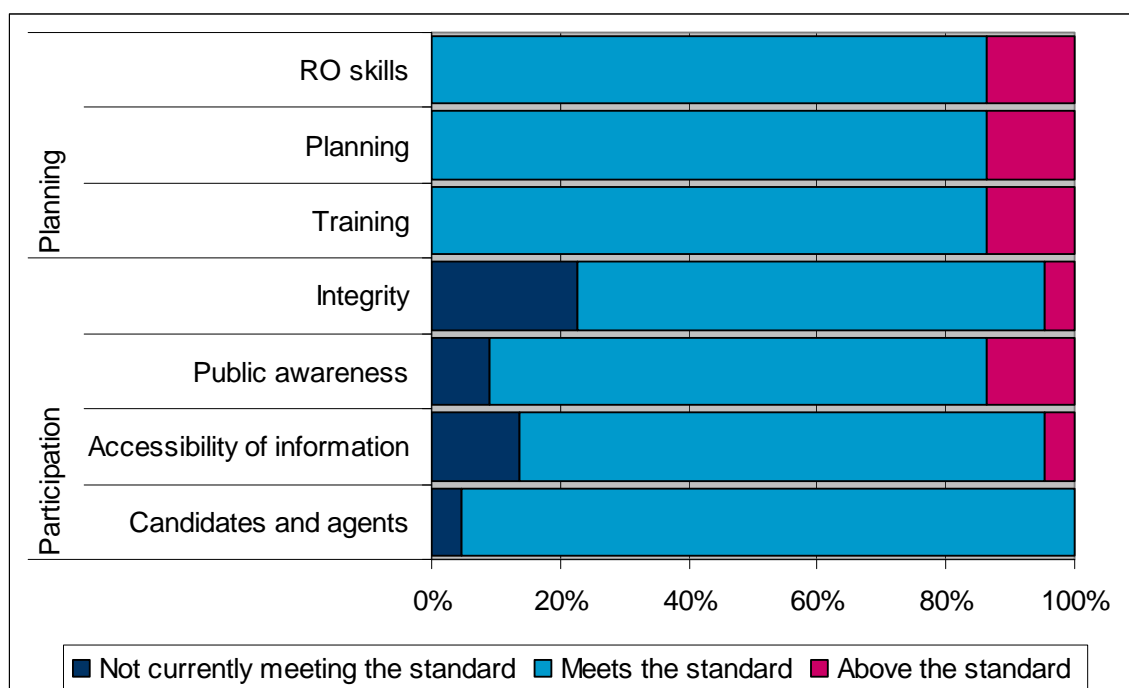
3.29 All ROs but one met the final performance standard: 'Communication of information to candidates and agents' with six ROs saying that they exceeded the standard. Evidence to support this was limited as only the Regional Returning Officer for Scotland dealt directly with candidates and received nominations this year. Some ROs provided a briefing for local party agents and activists while others offered a drop-in service to supplement written information which reflects the differing nature of the European Parliamentary election.

Wales

3.30 The European Parliamentary elections in Wales in 2009 were conducted on the basis of Parliamentary constituencies. Over half of these constituencies span local authority boundaries to some degree. This poses logistical issues that have to be overcome, especially in relation to the management of postal voting. These issues are explained in more detail in our report on the election.

3.31 Advance planning, coordination and cooperation between ROs with shared boundaries were particularly important in Wales in 2009, in order to help overcome logistical challenges. The analysis shows that ROs performed better than the GB-wide average in these areas. Chart 4 shows performance against the standards for the ROs in Wales.

Chart 4: Performance of ROs in Wales against the performance standards



3.32 As is the case across Great Britain as a whole, overall performance across the seven standards by ROs in Wales gives a very positive picture. Areas for improvement relate particularly to encouraging participation and the integrity of the election:

- the ROs for all 22 local authorities in Wales met or exceeded the first three standards.
- a quarter of officers (5 in total) said they were 'Below the standard' for standard 4: 'Maintaining the integrity of an election'
- a small number of ROs said that they did not meet standards 5, 6 and 7 (the three standards relating to participation).

3.33 As a whole, ROs in Wales performed strongly when compared with the performance of ROs across the rest of Great Britain: a higher proportion of ROs in Wales met or exceeded all the standards.

Planning and organisation

Skills and knowledge of the Returning Officer

3.34 ROs in Wales performed strongly against this standard with the majority of officers assessing themselves at standard, and three saying they were 'Above the standard'. As part of our verification process, we held personal discussions with more than a quarter of ROs and in all cases found that the self-assessments were accurate.

3.35 At the European Parliamentary elections, 14 of the 22 ROs in Wales were Chief Executives of their local authorities. They often cited the ability to command council resources more easily as an advantage of this position. ROs who did not have the additional responsibility of acting as Chief Executive tended to be more actively involved in operational activities. In our verification discussions, an RO who is not a Chief Executive and assessed as 'Above standard', cited more active involvement, specialist knowledge, and the backing of their local authority in being able to command additional resources, as features of their role.

Planning and training

3.36 Performance by ROs in Wales against standard 2: 'Planning' was strong. Over 86% (19 officers) of ROs met the standard for planning for the European Parliamentary election and the remainder exceeded the standard. There were no officers who said they were 'Below the standard'. All officers had written plans and procedures in place.

3.37 Similarly, all 22 ROs in Wales reported that they met or exceeded standard 3: 'Training'. Three ROs said they exceeded the standard and this was corroborated by verification.

3.38 The strength across Wales in these areas reflected the emphasis put on advance planning by the RRO, who had requested copies of draft plans from local Returning Officers by the end of 2009. The RRO had also emphasised the importance of training of polling station staff. Pre-election seminars and discussions jointly held by the RRO and the Commission in November 2008 and early 2009 had aimed at achieving consistency amongst local ROs in planning and training.

Integrity

3.39 Five ROs reported that they did not currently meet standard 4: 'Maintaining the integrity of an election'. Proportionally, this is higher than we have found across Great Britain in general, although across Great Britain, performance at this standard showed the highest number of ROs assessing themselves below the standard (19%).

3.40 Feedback suggests that nearly all of the ROs who assessed themselves 'Below the standard' have informal checks and procedures in place to detect electoral malpractice, but do not document their practice. Thirteen EROs (59%) reported that they did not currently meet the equivalent standard saying that they did not have formal documented plans in place as the reason for rating themselves below the standard. Nevertheless, they fulfilled most of the other criteria for the standard. Improvement at this standard would be achieved by the use of better documented plans and we have recently introduced templates for local adaptation that can assist.

Participation

3.41 The majority of ROs in Wales said that they performed either at or above the standard for standard 6: 'Public awareness'. Three ROs said they did 'Not currently meet' the standard. This is contrast to the performance of EROs where over three quarters of all Welsh local authorities (17 out of 22) said they did not currently meet the equivalent standard. Three ROs said they were 'Above the standard'. Again, failure to meet this standard in part reflects the absence of formally documented public awareness strategies, an issue already highlighted in the ERO performance assessment. Template plans are available on the DoPolitics website www.dopolitics.org.uk

3.42 Nearly all ROs in Wales reported that they met or exceeded standard 6: 'Accessibility and communication of information'. Three officers said that they fell below the standard. Similarly to the feedback received by EROs, (where all officers said they either met or exceeded the standard) ROs suggest that there is less need for a large variety of publications in different languages than England and Scotland, because there is not the same demand for the service. All documents are produced in English and Welsh.

3.43 The majority of ROs reported that they met standard 6: 'Accessibility and communication'. Through our verification process, we have identified the need for better use of local demographic information to improve access to information, not only for voters whose first language is not English or Welsh but also for voters with disabilities.

3.44 All but one officer met standard 7: 'Communication of information to candidates and agents'. No officers assessed themselves 'Above the standard', in that they did not carry out an evaluation of the effectiveness of the information provided to candidates and agents. However, in the European Parliamentary elections, candidate nominations and political party lists are received by the RRO, not by local ROs, so in 2009 this was a lower priority area of activity for them.

4 Conclusions

4.1 Overall the first self-assessment against the performance standards for Returning Officers (ROs) paints a positive picture of performance across Great Britain. Although there are important areas where improvements are required before the UK Parliamentary general election, we feel confident that there is a sound basis of performance on which to build.

4.2 We have been encouraged both by the overall level of performance against the standards and by the willingness of ROs and their teams to use the performance standards framework as a basis for continued improvement. However there are still areas within two particular standards, 'Maintaining the integrity of the elections' and 'Accessibility of information to electors' where improvements need to be made.

4.3 Where we had previously found for electoral registration that there appeared to be a particular weakness in performance against standards which require evidence of formal documented plans, this was not replicated for election management. However, the main reason for falling below the two standards outlined above, as well as performance standards 5: 'Public awareness' was the lack of a documented plan.

4.4 Planning and preparation is the key element to providing a successful election process, minimising the risks to a complex process. Comprehensive written plans, which can be easily followed, will help ROs plan their duties and create a more efficient process to run an election. For this reason, ROs should refer to the significant amount of resource and support material we have already made available, such as the guidance manuals and the Do Politics website www.dopolitics.org.uk.

4.5 In the meantime we will take positive steps, using the findings of this analysis, to provide further targeted support and guidance to help ROs who do not currently meet the standards to improve their performance.

4.6 Firstly, as highlighted in paragraph 2.8, we have already published election planning templates, which are available for download from our website at: www.electoralcommission.org.uk/guidance/resources-for-electoral-administrators/uk-parliamentary-elections. Secondly we will engage with those ROs failing to meet certain key standards, notably integrity and participation, to ensure that they have the plans and processes in place prior to the UK Parliamentary general election. We expect to carry out this work alongside the verification of the ERO performance standards between January and February 2010.

Appendix A – ‘Planning and organisation’

1. The first subject area looks at planning and organisation skills of the Returning Officer (RO). Running an effective election is a major logistical project involving both permanent and temporary staff from both inside and outside the local authority; outsourcing and contract management of IT equipment and printers as well as security and media handling. Therefore planning is of the utmost importance.
2. There are three standards in this area, which are:
 - standard 1 – ‘Skills and knowledge of the Returning Officer’ (‘Skills’)
 - standard 2 – ‘Planning processes in place for an election’ (‘Planning’)
 - standard 3 – ‘Training’
3. Although all three of the above standards fall into the ‘Planning and organisation’ subject area, the following analysis deals with each standard separately. This is of particular importance for the first standard which relates personally to the role of the RO.
4. The majority of the work for the remaining two standards in this subject area, and in fact the remaining six standards overall, although under the overall accountability of the RO, will most likely be carried out by the electoral services manager, or for the purpose of the European Parliamentary elections, the deputy Local Returning Officer (LRO). In addition, both standards 2 and 3 require the RO to have a written plan to be assessed at ‘Performance standard’.
 - Nearly all ROs (just over 96%) said that they either met or performed above the first standard. Just over three-quarters met the standard with a fifth saying they were ‘Above the standard’. Fewer than 4% (12 ROs) said they did not meet the standard.
 - Similarly, nearly all ROs met or exceeded standards 2: ‘Planning’ and standard 3: ‘Training’ (just under 95% and just under 98% respectively). The relative proportions of ROs who assessed themselves below these standards was very low.
 - No Returning Officers from either Scotland or Wales assessed themselves below any of the three standards.
 - Only one RO assessed themselves below all three of the standards in this area.

Standard 1: ‘Skills and knowledge of the Returning Officer’

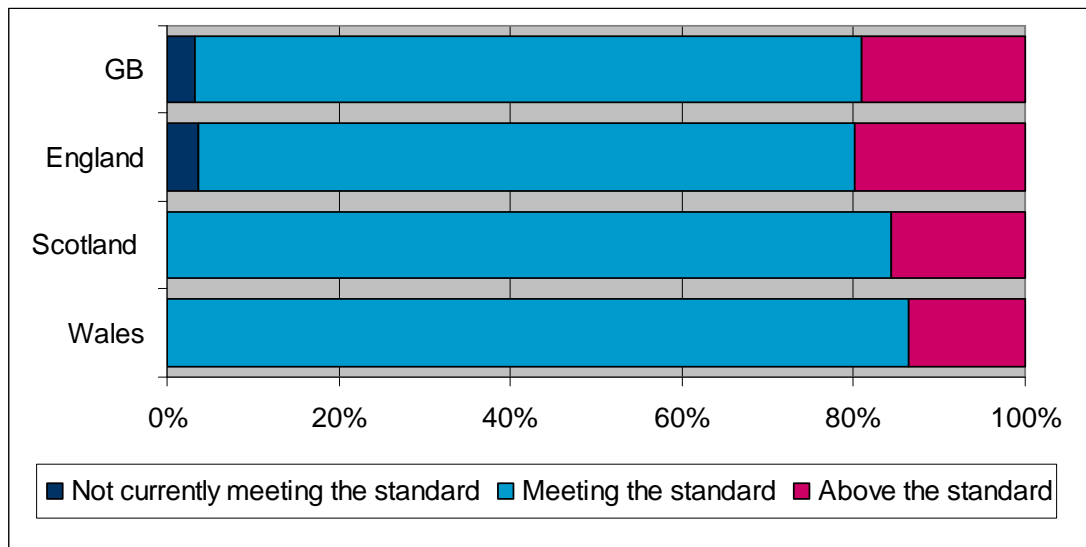
5. The first standard looks at the skills and knowledge of the Returning Officer (RO). For the purposes of the European Parliamentary elections, we asked each Local Returning Officer to submit a return to ensure that one was received from each local authority area. In some cases, the Local Returning Officer was also the Regional Returning Officer for the elections.

6. In order to meet the ‘performance standard’ the RO should meet all the requirements as outlined in the standard. This includes:

- having a working knowledge of the legislation to conduct the election
- identifying and overseeing the necessary actions to rectify any errors in procedure
- commanding the necessary staff and resources for a well-run election
- supporting the staff administering the election
- overseeing the planning and risk management of an election
- ensuring that the election accounts are completed in a timely manner

7. In order to be assessed ‘Above the performance standard’, in addition to the requirements outlined above, the RO should be able to demonstrate that they have a strong knowledge of electoral law and both existing and developing practice, and that they undertake continuous professional development in regards to election management. Specifically, they should be able to provide a record of training and briefing events attended as evidence to support the assessment.

Chart A1: Breakdown of standard 1: ‘Skills and knowledge of the Returning Officer across Great Britain’



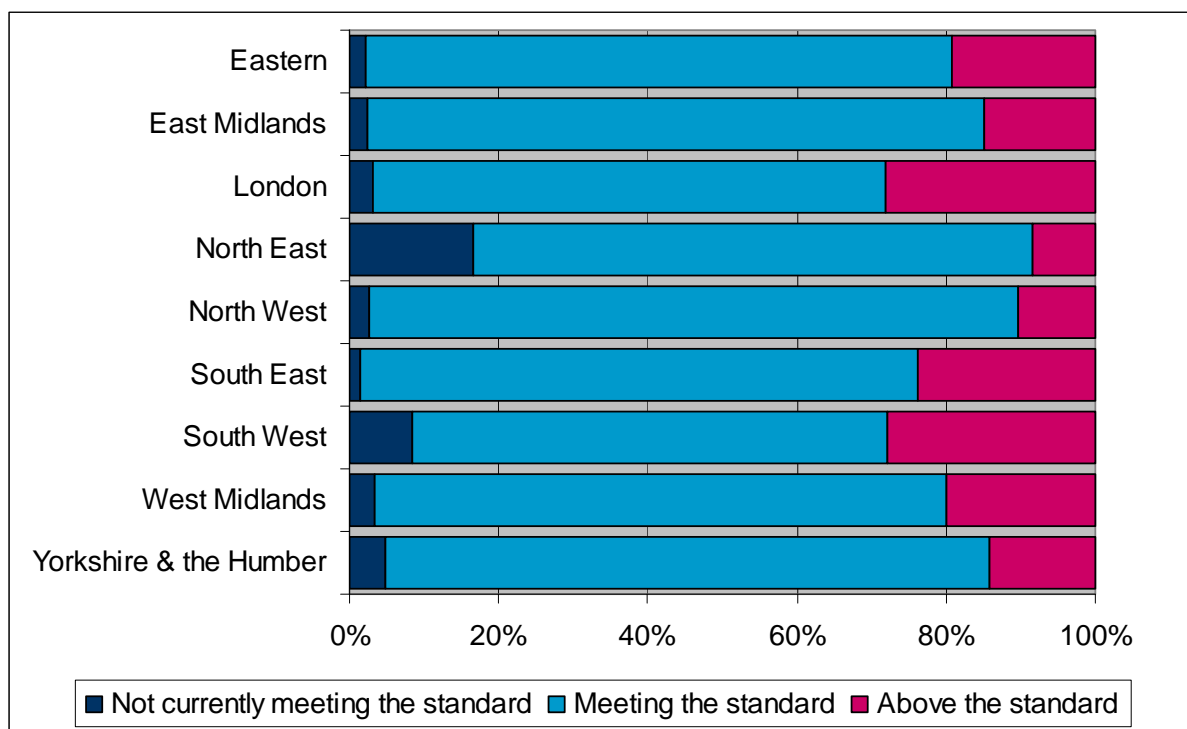
8. Chart A1 shows that nearly all ROs either meet or exceed the standard, with a very small number (13) assessing themselves ‘Below the standard’. A similar proportion of officers from Scotland and Wales say they are above the standard while only England has officers who have assessed themselves below it.

9. As part of our verification process to assess the reliability and accuracy of these assessments, Commission representatives met with approximately a quarter of the ROs in each region across Great Britain. Of those that we visited, the majority of ROs held the position of Chief Executive of the local authority. There was no evidence to suggest that ROs who were not at Chief Executive level were more likely to assess themselves below the standard.

However ROs who also acted as Chief Executive were more likely to be able to command council resources more easily for the running of the election.

10. In addition we found that in larger authorities, the Chief Executive generally adopted a less ‘hands on’ approach to the European elections with the general planning, training and operational aspects of the election being carried out by the deputy RO. Although the majority of ROs were heavily involved in the detailed planning of the election, those who were new to the role or new to the authority were more ‘hands on’ than others. Chart A2 gives a further breakdown by English local authority type.

Chart A2: Breakdown of performance standard 1: ‘Skills and knowledge of the Returning Officer’ by European Parliamentary region



11. ROs in London represent the highest proportion ‘Above the standard’ although the relative proportions at this level are fairly similar across half of the regions. One of the reasons given was the overall relationship between Chief Executives within London, specifically the London Chief Executive meetings where electoral issues were often discussed. However it is important to note that ROs who were not Chief Executives do not have the advantage of this structure.

12. Other initiatives given to be assessed ‘Above the standard’ included the RO personally attending pre- and post-election briefing sessions; attendance at SOLACE and Association of Electoral Administrators training courses and being a member of the Association of Council Secretaries and Solicitors, the professional association for managers of corporate governance (to keep up to date with legislative changes).

13. More ROs in the South West assessed themselves below this standard (four in total) which represented just under a third of the total number 'Not currently meeting the standard' across Great Britain. This was due to variety of reasons. Two ROs highlighted the fact that there was no official RO appointment or supporting documentation available as evidence. Another RO in a new unitary authority reported that he was new to elections and had no prior working knowledge of the electoral process or of electoral law. Another RO, in an authority where electoral services were outsourced under the operation of a private contractor, stated that part of the requirements for meeting the standard was met but not all.

Standard 2: 'Planning for an election'

14. This standard looks at the process the RO had in place to plan for the European election. This standard has three levels and in order to meet the standard the RO should have a written plan for managing the election and ensure that contracts (and contingency arrangements) were in place for all functions that have been outsourced. The plan should cover the following areas:

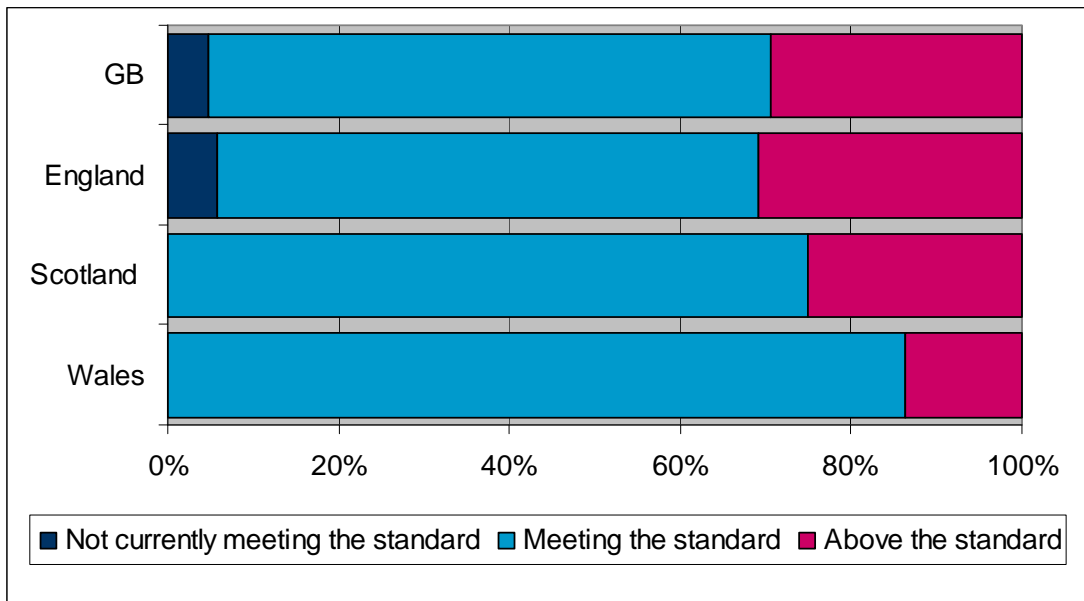
- clearly defined objectives and success measures
- detail of tasks and deadlines
- risks – identification and mitigation
- recruitment of temporary/permanent staff where needed
- business continuity arrangements to cover for loss of election staff, loss of service and loss of venue during the election period
- consideration of physical and communication accessibility including a plan of the layout of the count premises
- an outline of the roles and duties of all the staff present at the count

15. In order to be 'Above the performance standard', in addition to having a fully documented plan, the RO should carry out a thorough evaluation of all processes outlined in the plan, seeking feedback from stakeholders and amending the plan, where necessary, for future elections. An evaluation plan and documented feedback should be available as evidence to support the assessment.

16. Particular parts of the process which may be considered as part of the evaluation may include:

- polling places and polling stations
- contract management
- staffing
- equipment and supplies
- finance
- count arrangements
- the management of postal voting

Chart A3: Breakdown of standard 2: ‘Planning across Great Britain’

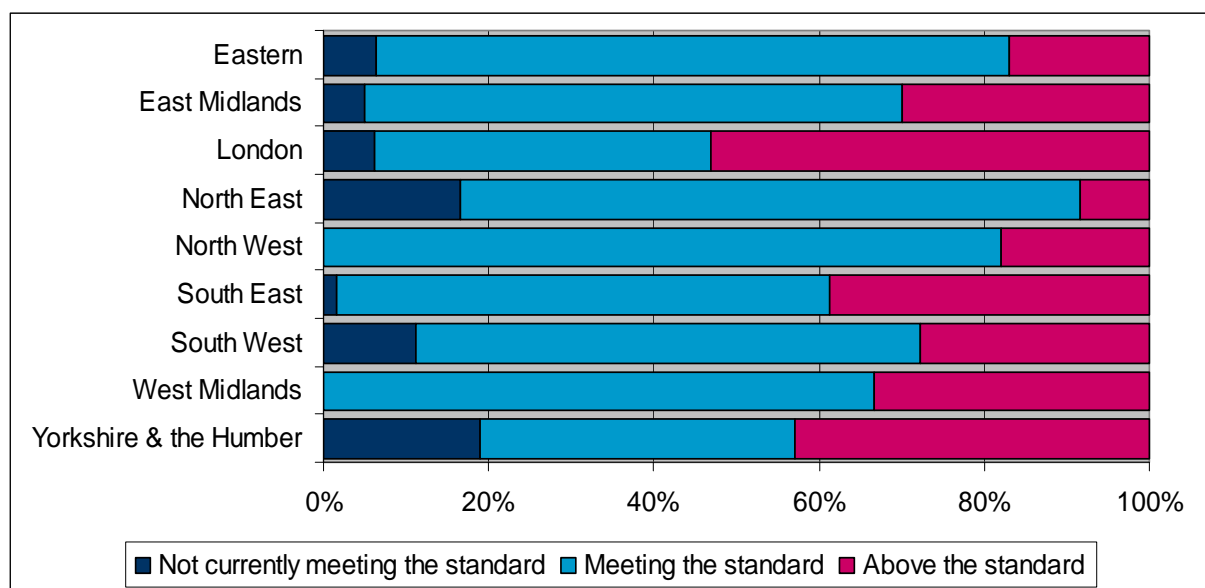


17. Chart A3 shows that nearly all ROs say that they are at ‘Performance standard’ or ‘Above the standard’ with just under a third saying that they performed ‘Above the standard’, the highest proportion of all seven standards. Similarly to the first standard, all the ROs who say that they are ‘Below the standard’ (20 in total) are from England. This is in direct contrast to our findings on the performance standards for Electoral Registration Officer (ERO) where although over three-quarters of EROs said that they met the planning standard, over a fifth across Great Britain (91 in total) said they were below standard, primarily due to the lack of a written plan.

18. During the verification process we were able to meet a number of electoral administrators and see the types of plans that were being used to plan the election. It is clear that the general planning process for elections is fairly robust, largely due to the more substantial direct involvement on the part of the RO and the more public and high-profile nature of both the role and the results. This is again in contrast to our findings for the annual canvass and rolling registration planning which we found had less direct involvement from the ERO, possibly due to the lower profile of registration compared to elections.

19. Across the English European Parliamentary regions, on average, just over 80% of ROs say that they have a plan. However, as Chart A4 shows, there is a small proportion across each region that does not. Just over half of ROs in London say that in addition to a formal written plan (which in most cases is a collection of the various documents covering specific areas), they carry out a full evaluation including receiving feedback on the planning process from staff, voters, candidates and agents. However there is still little evidence of a written evaluation plan.

Chart A4: Breakdown of standard 2: ‘Planning by English European Parliamentary region’



20. Just under a fifth of ROs in the North East and Yorkshire and Humber assessed themselves below standard. Overall, of those that assessed themselves below standard, nearly all said that they had a plan in place, but did not feel that they satisfied the criteria for a comprehensive written plan as specified in our guidance.

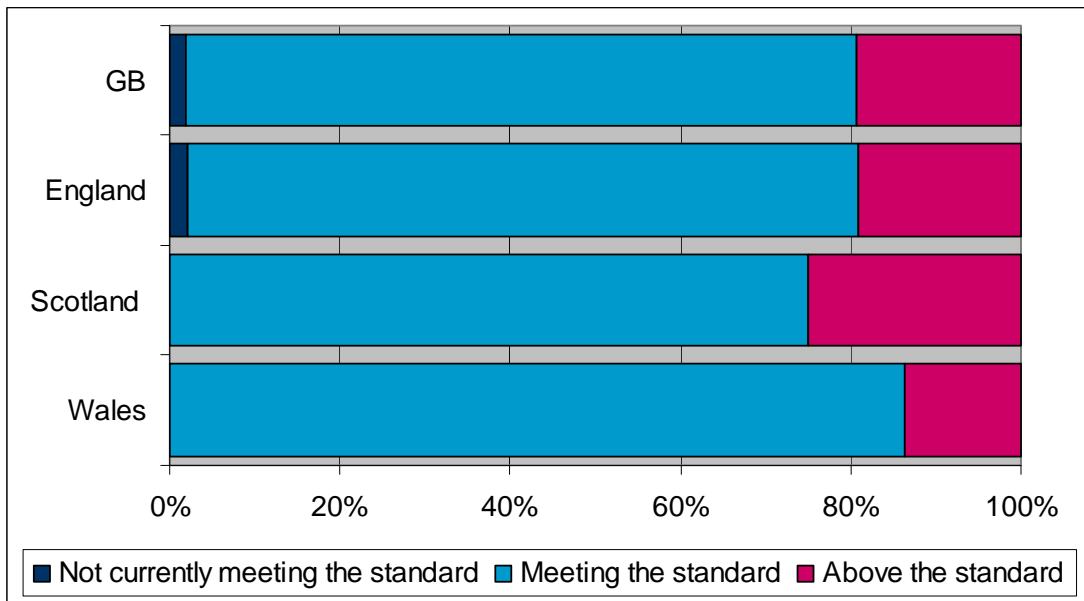
Standard 3: ‘Training’

21. The third standard aims to ensure that ROs have provided appropriate training for staff to deliver the election. This applies to both permanent and temporary staff within the electoral services team as well as polling station and count staff.

22. This standard has four levels, with two levels below the standard. The lowest level in the ‘Not currently meeting the standard’ category indicates that the RO does not carry out any activities towards meeting the standard, while the second level indicates that some of the activities we would expect are being carried out, but not sufficiently to meet the standard. For the purpose of the analysis which follows, we have used only the three categories of performance (‘Not currently meeting the standard’, ‘Performance standard’, and ‘Above the performance standard’), and have not illustrated findings relating to the levels within each category.

23. In order to meet the standard, ROs should have a written schedule of training activities for all staff involved in the election process and carries out an evaluation of training activities every year. In addition all staff, particularly polling station and count staff should receive training on access issues and disability awareness. Part B, ‘Preparing for a European Parliamentary election’, Section 7, ‘Staffing’ provides information on training of election staff.

Chart A5: Breakdown of Standard 3: 'Training across Great Britain'

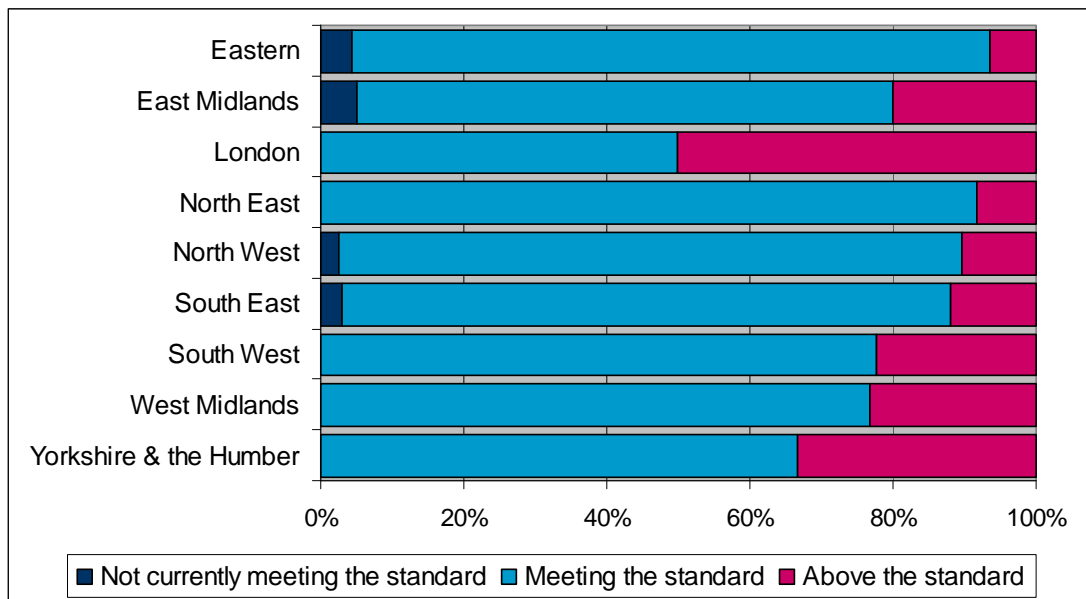


24. Chart A5 shows that across Great Britain nearly all ROs say that they meet the standard and thereby have a written schedule of training activities. In Scotland and Wales, all ROs meet the standard with seven officers in Scotland and three officers in Wales saying they are 'Above the standard'.

25. A small minority of ROs (10) across Great Britain (all from England) said that they were 'Below the standard'. This meant that they only provided basic training for permanent members of staff to give an understanding of legislative requirements. Our analysis of the narrative boxes on the self-assessment forms and face-to-face visits with electoral services teams suggests that the primary reason for an assessment below the standard is the lack of a written schedule of training activities, rather than lack of training. Almost all ROs offer some form of basic training to their staff. However we did find that in a number of cases, the training plan is part of the overall plan for the election covered in standard 2: 'Planning processes in place for an Election'.

26. This is again in contrast to the performance of EROs against the equivalent standard (standard 10) where just under a quarter of officers said that they did not meet the standard. This was largely due to the lack of a written schedule of training activities. Our discussions with administrators identified that there does appear to be significantly more momentum for elections training than for registration and canvassing activity, largely due to the very high profile and public nature of the role and the increased number of staff required to run an election.

Chart A6: Breakdown of Standard 3: 'Training by English European Parliamentary region'



27. Looking in more detail at the English Parliamentary regions, Chart A6 shows that the vast majority of ROs are either at 'Performance standard' or 'Above the standard'. Half of ROs in London and just under a third in Yorkshire & the Humber say that they are 'Above the standard'. From the evidence verified in some areas (for example the South West and London) it was clear that the training was weighted more towards polling station staff than postal vote and counting staff.

28. However, just under 10% of officers in the Eastern region have assessed themselves in the 'Not currently meeting the standard' category.

Appendix B – ‘Integrity’

1. The Electoral Commission has monitored issues around electoral malpractice since the first Commission report on elections in 2001. We have carried out this work within the context of our overarching powers to keep electoral law and practice under review⁵ and to report on major elections. However, the introduction of the performance standards framework has enabled us to look in more depth at some of the processes Returning Officers (ROs) have in place to tackle electoral malpractice. There is one standard in this area:

- standard 4 – ‘Maintaining the integrity of an election’ (‘Integrity’)
2. One in five ROs assessed themselves below standard 4: ‘Integrity’. These ROs said that this was principally due to the lack of a written plan. Nearly all officers meet the remainder of the criteria to achieve the standard.

Standard 4: ‘Maintaining the integrity of an election’

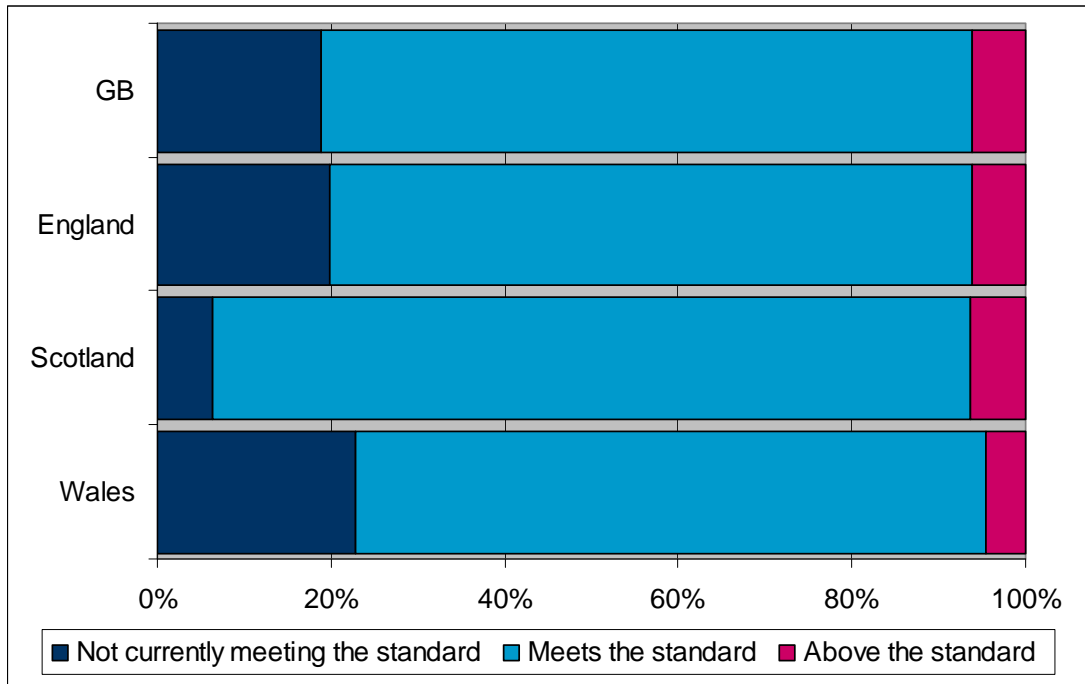
3. It is vital that the public has confidence in the integrity of the electoral process. ROs should be taking comprehensive steps and working with the police to minimise the potential for possible electoral malpractice in the electoral process. They should also involve the political parties and, where possible, independent candidates in preparing their plans. A planned and positive approach to maintaining the integrity an election is essential.

4. The aim of this standard is to ensure that ROs have a process in place to identify any patterns of activity that might indicate electoral malpractice and any security issues that may arise. The standard is divided into four levels, with two levels being below the standard and one level above. The lowest level in the ‘Not currently meeting the standard’ category indicates that the RO does not carry out any activities towards meeting the standard, while the second level indicates that some of the activities we would expect are being carried out, but not sufficiently to meet the standard. For the purpose of the analysis which follows, we have used only three categories of performance (‘Not currently meeting the standard’, ‘Performance standard’, and ‘Above the performance standard’), and have not illustrated findings relating to the levels within each category.

5. To meet the standard, ROs are expected to have a written plan which demonstrates how they deal with concerns about electoral malpractice as well as identify any risks. The standard also requires that the RO has ensured that links have been developed with the local police/single point of contact (SPOC) and that the RO ensures that work with political parties and independent candidates is carried out.

⁵ Section 6, Political Parties, Elections and Referendums Act 2000 (PPERA).

Chart B1: Breakdown of standard 4: 'Integrity across Great Britain'



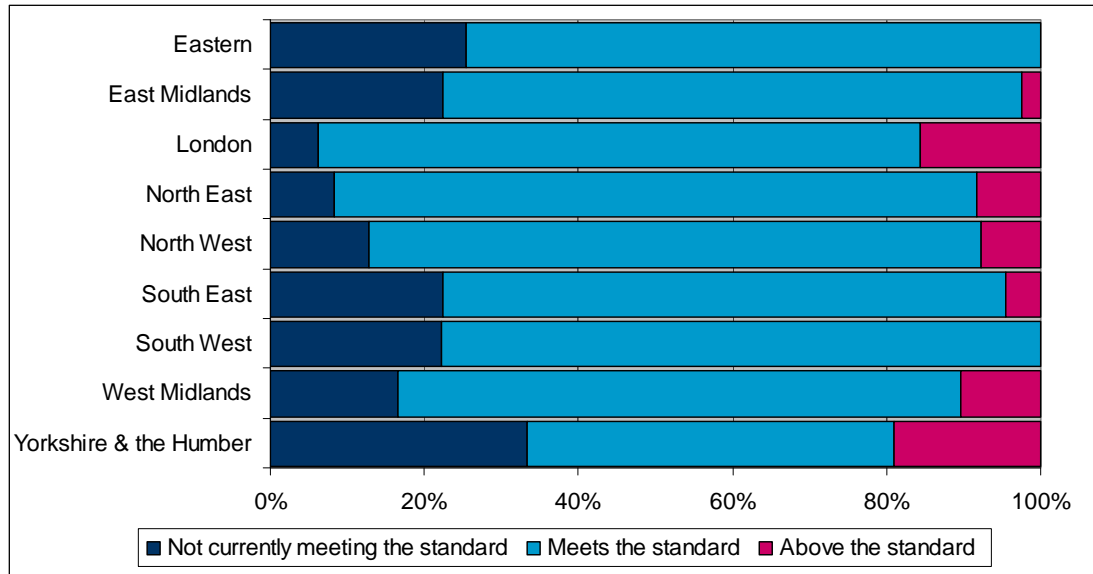
6. Chart B1 shows that the majority (just over 80%) of ROs in Great Britain say that they meet or exceed the standard. However just under a fifth of ROs said that they did not meet this standard, the highest proportion at this level across all the seven standards. The vast majority of those ROs who have assessed themselves below this standard said that informal systems are in place to deal with issues of electoral malpractice, but these are not documented. Most have contact with their SPOC and work with political parties and independent candidates. However, they fail to meet the standard due to the lack of a documented plan. No ROs assessed themselves at the lowest level in the 'Not currently meeting the standard' category where no systems are in place to assess risks of electoral malpractice when planning for an election.

7. Nearly all ROs in Scotland say they meet the standard, the highest proportion across Great Britain. A small but significant number of ROs assessed themselves above the standard in Great Britain, with performance across England and Scotland being the same as that across Great Britain and 5% of ROs assessing themselves as above the standard in Wales. Just under a fifth of ROs in England say that they are 'Not currently meeting the standard', with just over a quarter in Wales and a smaller proportion (6.9%) in Scotland.

8. The findings above correspond with those that were found following the analysis of the ERO assessments where there was a significant proportion (just over 36%) of EROs who failed to meet the standard relating to maintaining the integrity of registration and absent vote applications. Again the vast majority of those EROs who assessed themselves below this

standard said that informal systems were in place, but these were not documented.

Chart B2: Breakdown of standard 4 by English European Parliamentary regions



9. The majority of ROs across all regions in England say that they have a written plan outlining steps to be taken to deal with concerns about electoral malpractice. However Chart B2 shows that there are significant numbers across all regions who say they fall below the standard. London has the highest percentage of ROs meeting or exceeding this standard with 94%, of which 16% said they were 'Above the standard'. A similar proportion of ROs in Yorkshire & the Humber assessed themselves as 'Above the standard' however they also have the highest proportion of officers, just under a third, 'Not currently meeting the standard'.

10. Our verification process found that across Great Britain, the plans greatly varied in quality. Authorities are not complacent about instances of electoral integrity but those that had first-hand experience of electoral fraud tended to have much more comprehensive plans in place than those who did not. Nearly all ROs had good working relationship with the SPOCs but the main reason for falling below the standard was not having a formal written plan to tackle integrity issues.

Appendix C – ‘Participation’

1. The final subject area looks at the Returning Officers (ROs) responsibility under Section 69 of the Electoral Administration Act 2006 to take appropriate steps to encourage participation of electors in the electoral process. This area also looks at the accessibility and communication of information to electors, candidates and agents. There are three standards in this area:

- standard 5: ‘Planning and delivering public awareness activity’ (‘Public awareness’)
- standard 6 – ‘Accessibility of information to electors’ (‘Accessibility’)
- standard 7 – ‘Communication of information to candidates and agents’ (‘Communication’)

2. All of these areas play a key role in encouraging voters to participate in the electoral process and ensuring elections are well run.

3. The self-assessment returns for ROs across Great Britain show that the vast majority of them are meeting or exceeding the participation standards.

- Just over three quarters of ROs met or exceeded all three standards in this subject area. One RO failed to meet any of the three standards.
- The vast majority of ROs (just under 90%) met or exceeded standard 5: ‘Public awareness’.
- Just over 80% of ROs met or exceeded standard 6: ‘Accessibility’.
- Nearly all ROs met or exceeded standard 7: ‘Communication’.

Standard 5: Planning and delivering public awareness activity

4. A public awareness strategy is the bedrock of public awareness work, setting out the aims, audiences, timelines, actions and evaluation measures of any awareness activity carried out. This helps to avoid isolated, granular or reactive activity that is not properly planned or evaluated. It helps to ensure value for money and continuity planning. Most importantly, it ensures that ROs have considered all parts of their local population, and are planning appropriate and measurable activity that is tailored to their electors.

5. This standard is divided into four levels with two levels above the standard. The lowest level in the ‘Above the performance standard’ category indicates that the RO records meetings, discussions and correspondence with external bodies, as well as records appropriate public awareness activity undertaken.

6. To meet the ‘performance standard’, the RO must have a written strategy. It is important to note that this does not have to be a separate strategy from the strategy required to meet performance standard 6 of the Commission’s *Performance standards for Electoral Registration Officers*.

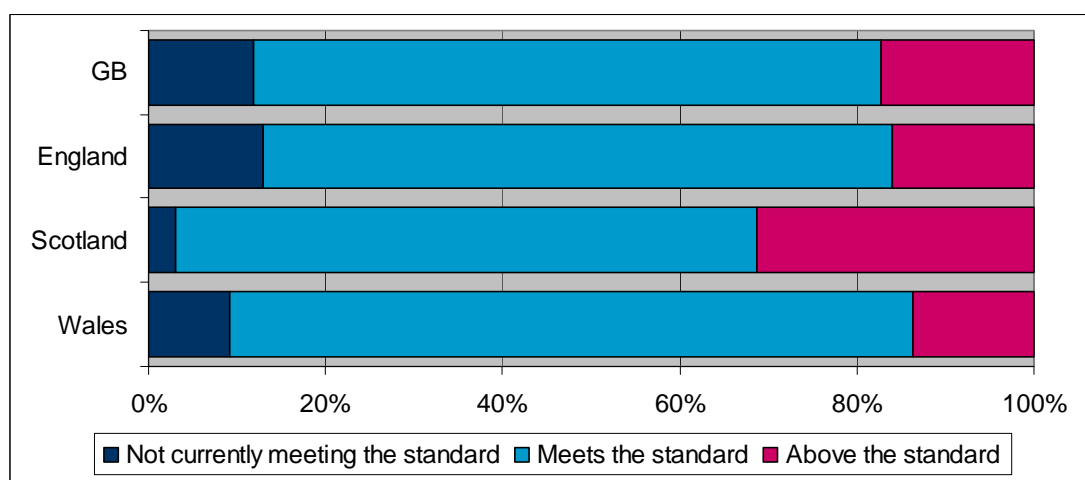
Depending on the structure and split of responsibilities of the local registration and elections functions, there may well be benefits in a joint strategy for both registration and elections, given the obvious overlap between the two in terms of participation and communication activity. A joint strategy may also encourage effective working partnerships between Electoral Registration Officers (EROs) and ROs, communications teams and others within the council.

7. Regardless of how the strategy is produced and formatted, it should contain a clear plan for the effective delivery of election information to electors, including:

- identifying target audiences
- clearly defined objectives and success measures
- risks – identification and mitigation
- resources (financial and staffing)

8. To meet the ‘Above the performance standard’ the RO must have engaged with external bodies regarding working with partners and should be able to provide records of meetings/correspondence and a record of work undertaken to support the assessment.

Chart C1: Breakdown of standard 5: ‘Planning and delivering public awareness activity’ across Great Britain



9. Just under 90% of ROs across Great Britain said that they either met or exceeded this standard. A similar proportion of ROs assessed themselves above and below the standard in England and Wales, while one officer in Scotland assessed themselves ‘Below the standard’. Just under a third of officers in Scotland assessed themselves ‘Above the standard’, the highest proportion across Great Britain.

10. This was in direct contrast to the equivalent standard for registration where two-thirds of EROs assessed themselves ‘Below the standard’. The main reason being the lack of a documented public awareness strategy. As mentioned previously, the high profile of elections accompanied with the direct

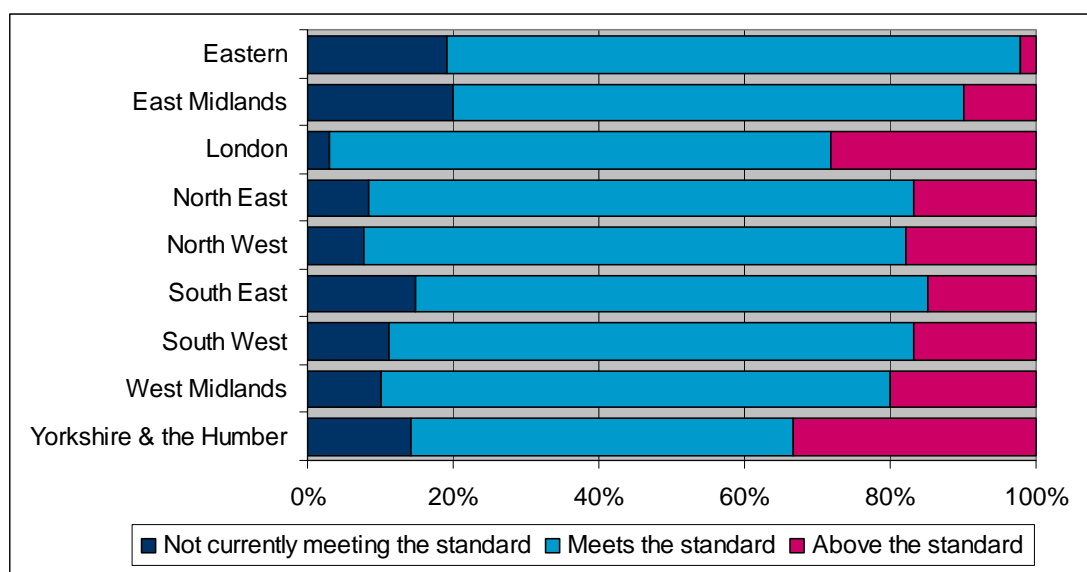
involvement of the RO suggests that greater care is taken to all aspects of planning and documentation for elections, including public awareness.

11. The verification visits and analysis of evidence submitted for this standard have highlighted that there are some good public awareness activities taking place. However in some cases, the RO only has informal plans in place. Those ROs assessing themselves 'Above the standard' have produced detailed plans clearly identifying the target audience, clear division of responsibility as well as identifying potential risks.

12. The majority of ROs also make use of council facilities, such as the council newsletter, leaflets and website to promote awareness. Others also use local media.

13. ROs who are not meeting the standard have given a variety of reasons such as lack of time, money and resources; however the main reason was the lack of a formal plan for public awareness work. Some ROs were able to provide detailed lists of initiatives they had undertaken, but these were not documented in way that they could be easily followed or evaluated. These responses are very similar to those provided for the corresponding standard for EROs.

Chart C2: Breakdown of standard 5 by English European Parliamentary regions



14. London has the highest number of ROs either meeting or exceeding the standard while a greater proportion of ROs in Yorkshire & the Humber assessed themselves 'Above the standard'. However, there is a small but significant proportion of ROs who assessed themselves 'below the standard' across all regions.

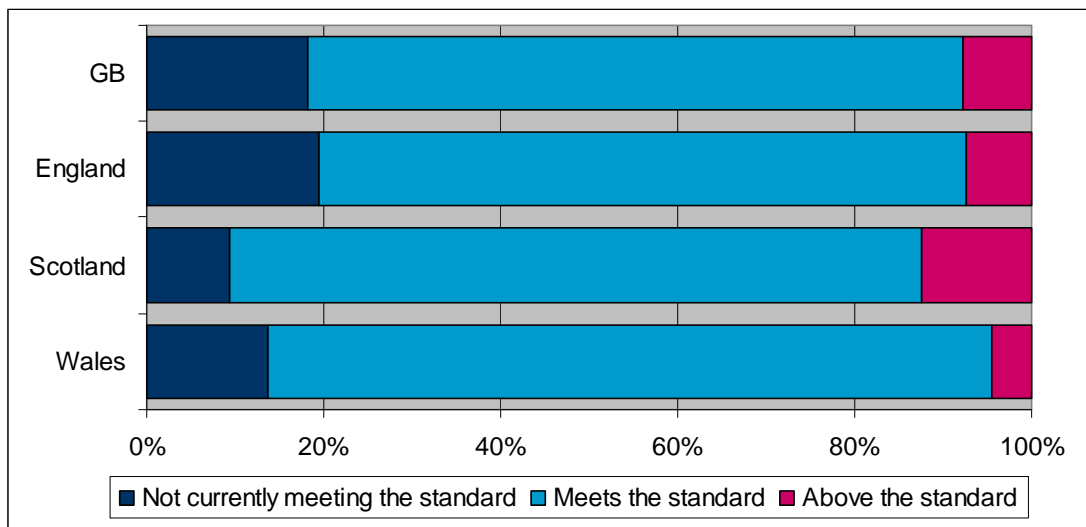
Standard 6: Accessibility of information to electors

15. The aim of this standard is to ensure that ROs provide a simple and user-friendly way for electors to access information. This standard has three levels, 'Not currently meeting the performance standard', 'Performance standard' and 'Above the standard'.

16. In order to meet the standard ROs must have examples of how the appropriate languages and formats have been decided, details of demographic monitoring and dissemination methods and records of polling station inspector reports on signage. In order to be 'Above the standard', ROs should have, in addition to the above, recorded the meetings/discussions/correspondence with those they have consulted.

17. The purpose of this standard is to highlight that some audiences need to be approached differently, and a single communication method or format may not necessarily be sufficient to reach all audiences. There are also a number of legal provisions regarding signage and information provided to polling stations which are summarised in Part B of our manual for ROs, *Managing a European Parliamentary election in Great Britain*, Section 6, 'Venues for election activities'. However, in addition, if the RO thinks appropriate, all election notices and documentation, except for the ballot papers provided to polling stations, may be provided in alternative languages.

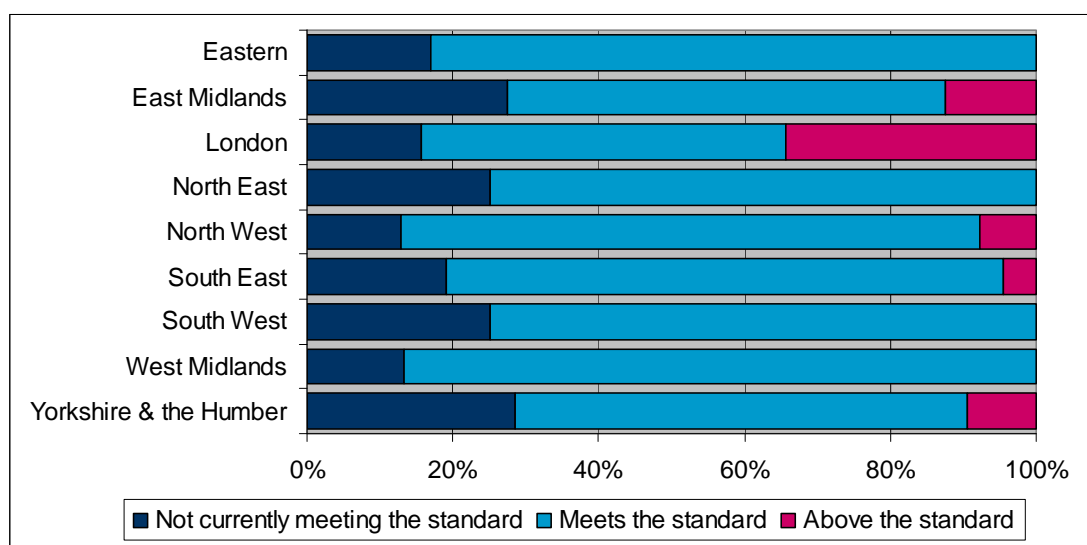
Chart C3: Breakdown of standard 6: 'Accessibility of information to electors across Great Britain'



18. Over four-fifths of ROs in Great Britain say that they either met or exceeded the standard, however, due to the high proportion of officers assessing themselves 'Below the standard'; it is the worst performing standard within this subject area. Scotland has the fewest number of ROs assessing themselves 'Below the standard' while Wales has the fewest number of ROs assessing themselves 'Above the standard'. The overall proportions are similar to the equivalent ERO standard (standard 8).

19. The narrative detailing reasons as to why ROs are below standard is similar to that provided for the ERO standards. Primarily this is not undertaking the required research into the need to translate materials into alternative languages. One reason provided is that the demographic of the area suggest this is not needed. Most ROs have in fact done some research into the demographic of the local area or identified the target audience by means of equality impact assessments or work undertaken by the local authority.

Chart C4: Breakdown of standard 6 by English European Parliamentary regions



20. Chart C4 shows that there are a significant number of ROs who have assessed themselves 'Below the standard' across all regions in England. However over a third of officers in London have assessed themselves 'Above the standard'.

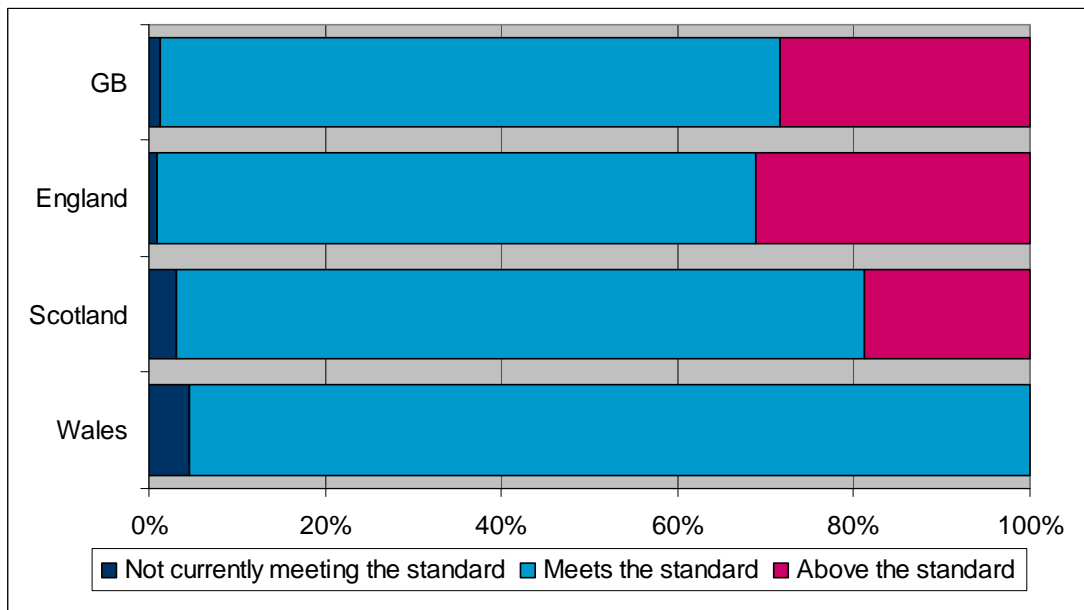
Standard 7: Communication of information to candidates and agents

21. This standard aims to ensure that ROs effectively communicate election information to candidates and agents. To meet the 'Performance standard' the RO should be able to provide examples of information given to candidates and/or agents to explain all aspects of the election process.

22. The 'Meet the standard' section contains two statements of which the second, 'The Returning Officer ensures that candidates have the opportunity to have their nomination papers informally checked prior to formal submission of their nomination' did not apply to Local Returning Officers for the purposes of the European Parliamentary elections. As such, Local Returning Officers could meet this standard by satisfying the first criteria only.

23. To be assessed 'Above the performance standard', in addition to the above, the RO should also evaluate the effectiveness of all information provided to candidates and agents and the communication methods used. This may include inviting candidates and agents to comment on the information provided.

Chart C5: Breakdown of standard 7: 'Accessibility and communication of information across Great Britain'

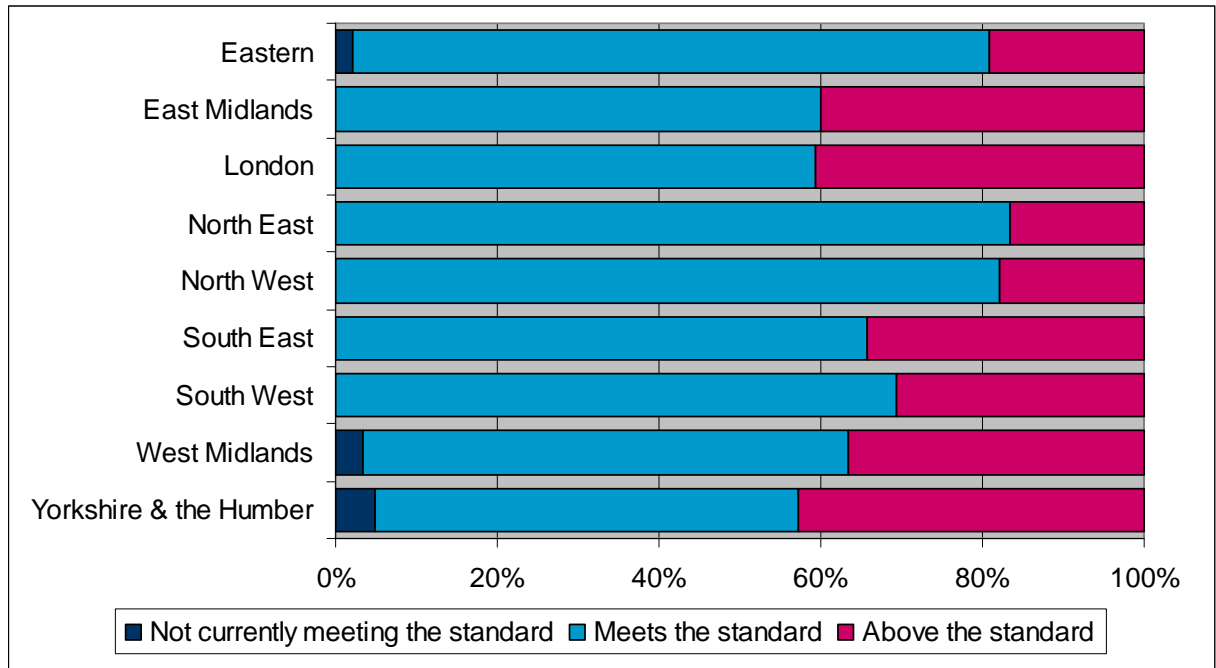


24. Chart C5 shows that nearly all ROs across Great Britain met or exceeded this standard, with over a quarter of these assessing themselves 'Above the standard', the highest proportion across all seven standards. Five ROs across Great Britain assessed themselves 'Below the standard' with three from England and one each from Scotland and Wales.

25. The high profile and public nature of elections means that it is important to have a good relationship with both candidates and agents. Our discussions with administrators and ROs have highlighted this is a high priority for them prior to the elections. Although the issue of nominations was carried out by the Regional Returning Officer, the vast majority of ROs gave personal pre-election briefings to candidates and agents.

26. Of those that assessed themselves 'Above the standard' the feedback we received showed that the majority of those also sought feedback from candidates and agents after the election seeking their views on the information supplied to them and also providing them with copies of the Commission's guidance. Chart C6 shows the high proportions of officers assessing themselves 'Above the standard' is fairly consistent across all regions.

Chart C6: Breakdown of standard 7 by English European Parliamentary regions



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see inside back cover for details.

We are an independent body set up by
the UK Parliament. Our aim is integrity and
public confidence in the democratic process.
We regulate party and election finance and
set standards for well-run elections.

Democracy matters