



Allegations of electoral fraud in Tower Hamlets in 2012

Report on the outcome of investigations

March 2013

Translations and other formats

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Summary

There were a number of reports of alleged electoral fraud during the months leading up to the May 2012 elections in London. These reports largely focussed on two wards of the London Borough of Tower Hamlets where local government by-elections were held in April and May 2012.

On 23 and 25 April 2012 the Electoral Commission received two sets of specific allegations of electoral fraud from local councillors from Tower Hamlets. We referred these allegations immediately to the Metropolitan Police Service (MPS) for investigation. Other cases of alleged electoral fraud were also reported directly to the MPS by local councillors.

The MPS has now confirmed that it has concluded investigations into each of the cases of alleged electoral fraud reported to it in relation to Tower Hamlets. This report sets out our analysis of the outcome of the MPS investigations into these allegations, highlights key issues relating to cases of alleged electoral fraud in Tower Hamlets in 2012, and sets out our conclusions and recommendations for actions to improve integrity and confidence for future elections in Tower Hamlets.

Key findings

- The MPS recorded and investigated a total of 64 cases involving 154 separate allegations of electoral fraud in relation to elections in Tower Hamlets in April and May 2012.
- The MPS identified three cases involving five allegations where there was evidence to suggest that an offence may have been committed, but where there was insufficient evidence to prove an offence or identify a suspect. No further action was able to be taken in these cases.
- The MPS identified 13 cases involving 44 allegations of false registrations where the information held by the ERO was found to be accurate, and there was no evidence of any offences having been committed.
- The MPS identified 48 cases involving 105 allegations where there was no evidence that an offence appeared to have been committed.

Recommendations

Our analysis of the cases of alleged electoral fraud reported in Tower Hamlets in 2012 highlights the need for some significant changes in the approach to reporting and investigating allegations in future. These changes will require action from the ERO and RO in Tower Hamlets and also from the MPS, but

they will also need to be supported by commitments from political parties, candidates and campaigners.

Without taking steps now to begin rebuilding confidence and trust between the key participants in the election process, we are concerned that the May 2014 local elections will again be damaged by allegations of electoral fraud.

- The **Electoral Registration Officer and Returning Officer for Tower Hamlets** should immediately commence a review of all current electoral registration and election integrity processes to identify opportunities for further improvements to monitor potential electoral registration or voting fraud; to increase their capacity to respond to allegations of electoral fraud; and to improve transparency about their electoral integrity approach.
- The **MPS** should review its plans for policing elections in 2014 in conjunction with the ERO and RO for Tower Hamlets. It should ensure that the plans published by the ERO and RO reflect the specific role of the MPS in relation to both operational policing in the Borough during the pre-election period, and also in dealing with and investigating allegations of electoral fraud. Given the considerable public interest in allegations of electoral fraud, the MPS should also review its communication strategy for future elections to ensure there is an appropriate balance between informing individual complainants about the outcomes of investigations, and providing more general assurance that the police are responding to concerns about electoral fraud and thoroughly investigating allegations.
- **Elected representatives, political parties, candidates and campaigners in Tower Hamlets** should immediately make a clear public commitment to following the Electoral Commission's Code of conduct for campaigners, which sets out what is, and is not, considered acceptable behaviour at polling stations and in the community during the lead-up to polling day, and also recommends a process for raising and dealing with complaints or allegations about electoral fraud.
- **The Electoral Commission** will monitor closely the plans and approach of the ERO and RO in Tower Hamlets and the MPS during the 12 months leading up to the May 2014 elections, to ensure that what they propose will be an effective response to improve confidence in the integrity of future elections. We will review and comment on any plans published by the ERO and RO for Tower Hamlets, including actions agreed with the MPS, and will monitor progress towards delivering that plan.

If we are not satisfied that the right measures have been identified or implemented in response to the recommendations set out in this report, we will make clear what further actions need to be taken by the ERO, RO or by others. We will publish our first progress report on the actions taken by the ERO and RO for Tower Hamlets by the end of July 2013.

1 Background

1.1 There were a number of reports of alleged electoral fraud during the months leading up to the May 2012 elections in London. These reports largely focussed on two wards of the London Borough of Tower Hamlets where local government by-elections were held: polling day for the Spitalfields and Banglatown ward by-election was 19 April; polling day for the Weavers ward by-election was on 3 May, the same day as polling for the 2012 Mayor of London and Greater London Assembly elections. Appendix A provides details of the results of the two by-elections

1.2 During February and April 2012 a number of press articles and blogs were published referring to allegations of electoral fraud in Tower Hamlets. Although the specific details generally related to the local government elections, the allegations were often placed in the context of the May 2012 London Mayoral election. They included three articles containing specific allegations of electoral fraud, published by the London Evening Standard and the Daily Telegraph, but those making these allegations had not reported them directly to the police at that time.¹ Other reports, published by both local and national media between 26 April and polling day, contained non-specific references to allegations of electoral fraud.

1.3 On 23 and 25 April 2012 the Electoral Commission received two sets of specific allegations of electoral fraud from local councillors from Tower Hamlets. We referred these allegations immediately to the Metropolitan Police Service (MPS) for investigation. Other cases of alleged electoral fraud were also reported directly to the MPS by local councillors or political parties.

1.4 This report sets out our analysis of the outcome of the MPS investigations into these allegations, highlights key issues relating to cases of alleged electoral fraud in Tower Hamlets in 2012, and sets out our conclusions and recommendations for actions to improve integrity and confidence for future elections in Tower Hamlets.

The law, roles and responsibilities for ensuring electoral integrity

1.5 The Representation of the People Act (RPA) 1983 sets out the broad framework for the administration of elections, and specifies a number of criminal offences relating to electoral malpractice.

¹ 21 February 2012: Evening Standard, *Voter fraud fears are exposed in run-up to election*; 21 April 2012: Telegraph, *Ken Livingstone's supporters accused of 'harvesting' postal ballot papers*; 23 April 2012: Telegraph, *Tower Hamlets: dead and incarcerated people vote*

Electoral Registration Officers

1.6 Electoral Registration Officers (EROs) are responsible for maintaining accurate and complete electoral registers for a specific local authority area. They are also required to provide information about changes to the electoral register and lists of postal and proxy voters to elected representatives, political parties and candidates. EROs are appointed by the local authority.

Returning Officers

1.7 Returning Officers (ROs) are responsible for administering the poll in their specific area. ROs are normally either the same person as the local authority ERO, or someone appointed by the authority. ROs and EROs are not specifically responsible for investigating allegations of electoral fraud, but may be able to provide information to help confirm whether or not an offence may have been committed, and to refer the allegations to the police for investigation where appropriate.

Greater London Returning Officer

1.8 The Greater London Returning Officer is responsible for the administration and co-ordination of the Mayor of London and London Assembly elections. Like EROs and ROs, the GLRO is a statutory officer, and the role is currently carried out by an officer of the Greater London Authority.

The Metropolitan Police Service

1.9 Any allegations of electoral fraud made in relation to elections in London outside the City of London would be investigated by the Metropolitan Police Service.² Anyone who has evidence that an offence may have been committed should report this to the police. Every police force in the UK has an officer who is responsible for dealing with allegations of electoral fraud.

The Electoral Commission

1.10 The Electoral Commission sets standards and provides guidance and training for EROs and ROs to prevent and detect electoral fraud. We also work closely with and regularly meet ROs and EROs, political parties, Royal Mail, the police and prosecutors to support electoral integrity. The Commission carries out checks to ensure that its standards are being met, and will provide extra scrutiny and support if not, particularly in areas where there has been a history of allegations of electoral fraud. The Commission also publishes reports on the administration of certain elections.

1.11 The Commission works with the UK's Associations of Chief Police Officers and the Crown Prosecution Service to provide regular training and guidance for police forces in preventing and detecting electoral fraud. We also provide support to the network of police force single point of contact officers, and publish data and analysis of cases of alleged electoral fraud recorded by the police each year.

² Any allegations of electoral fraud in relation to elections in the City of London would be investigated by the City of London Police.

1.12 The Commission is not responsible for investigating allegations of electoral fraud. Where a specific allegation is raised with us, we will refer it on to the relevant police force for further investigation.

Campaigners

1.13 Local campaigners, including elected representatives, candidates and political party activists, can play an important role in highlighting potentially inaccurate electoral registration records or identifying suspicions about possible electoral fraud. They are entitled to receive copies of electoral registers and lists of postal voters, which they can use to monitor the accuracy of registration information as well as supporting their campaign activities.

1.14 Campaigners who are concerned or think that electoral fraud may have taken place should raise the matter with their election agent or local party, or with the relevant Electoral Registration Officer or Returning Officer for the area. They may be able to explain whether or not an election-related crime has been committed, and refer it to the police if appropriate or provide details of the police contact for the relevant area so that campaigners can report their allegation directly.

Reporting on investigations into allegations of electoral fraud in Tower Hamlets in 2012

1.15 In our July 2012 report on the May 2012 elections in London we said that we would continue to track the cases of alleged electoral fraud in Tower Hamlets, and report on the outcome of cases once the police have concluded their investigations.

1.16 We have tracked the progress of investigations by the MPS into these allegations. This is our usual practice – each year we work with the Association of Chief Police Officers (ACPO) and the Police National Information and Coordination Centre (PNICC) to ensure a consistent and complete record of all cases of alleged electoral fraud reported to the police throughout the year. Each police force sends PNICC a monthly return detailing any cases of alleged electoral fraud, and the outcome of their investigations.

1.17 The MPS has now confirmed that it has concluded investigations into each of the cases of alleged electoral fraud reported to it in relation to Tower Hamlets. This report sets out information about the outcome of those investigations, and Appendix B provides summary information about each case.

1.18 The ERO and RO for Tower Hamlets has also prepared a report for members of the local authority on the outcome of allegations of electoral fraud from 2012.

Review of electoral fraud vulnerabilities in the UK

1.19 In October 2012 we began a comprehensive review of potential vulnerabilities within the current voting system and processes across the UK as a whole, which will aim to achieve consensus about the best balance between ensuring the integrity and the accessibility of electoral processes.

1.20 Our review will consider whether any changes to legislation or practice are needed to ensure confidence in the integrity of elections in the UK. We have previously recommended changes to improve the integrity of elections, including introducing individual electoral registration in Great Britain and new personal identifier checks on postal vote applications and returned postal ballot packs which were introduced in 2006. We have also recommended since 2010 that the UK Government should consider the case for requiring electors voting in person at polling stations to provide some form of photographic ID.

1.21 We intend to publish the conclusions and recommendations from this review in time for legislation to be brought forward during the current UK Parliament if necessary. We also intend to publish in May 2013 comprehensive information about all cases of alleged electoral fraud reported to UK police forces during 2012, based on the data collected by ACPO and PNICC.

2 Cases of alleged electoral fraud in Tower Hamlets in 2012

2.1 The MPS has now confirmed that it has concluded investigations into each of the cases of alleged electoral fraud which were reported in relation to Tower Hamlets in 2012. Appendix B provides summary information about each case, agreed with the MPS and based on their monthly returns submitted through PNICC.

2.2 This section provides a summary analysis of the key issues relating to cases of electoral fraud in Tower Hamlets in 2012.

The MPS recorded and investigated a total of 64 cases involving 154 separate allegations³ of electoral fraud in relation to elections in Tower Hamlets in April and May 2012.

2.3 The overall number of cases recorded by the MPS in relation to the 2012 elections in Tower Hamlets was larger than the number recorded by any other UK police force during 2012. The next largest number of cases recorded by a single force in 2012 was 33, recorded by Cambridgeshire Police. While the MPS has recorded all specific concerns or allegations of fraud referred to it in the return submitted to PNICC, it is likely that many would not warrant recording as crimes because no offences were actually identified.

2.4 The type of cases recorded by the MPS in relation to the 2012 elections in Tower Hamlets was not typical of the pattern seen in other areas during 2012. Whereas approximately 40% of all cases of alleged electoral fraud recorded by forces overall related to campaign offences, no such cases were recorded in relation to Tower Hamlets.

2.5 Cases relating to alleged postal voting offences accounted for 30% of all cases in Tower Hamlets, compared with just over 11% of cases recorded by forces overall. Cases relating to alleged false or inaccurate electoral register entries accounted for 52% of cases in Tower Hamlets, compared with just over 18% of cases recorded by forces overall. Cases relating to alleged false applications to vote by post accounted for 19% of cases in Tower Hamlets, compared with just over 4% of cases recorded by forces overall.

³ The term 'allegation' in this report relates to the number of instances where an individual vote, statement or action is alleged to have been the subject of electoral fraud. For example, where there is a property with eight electors and it is alleged that six voters may not be resident this would be treated as one case with six allegations.

2.6 The vast majority of cases of alleged electoral fraud investigated by the MPS were reported by local councillors from Tower Hamlets. Some individual allegations were duplicated between complaints from different councillors, and the specific allegations referenced in the media in April 2012 were also included in the cases reported by councillors.

2.7 The total number of cases recorded by the MPS in relation to the 2012 elections in Tower Hamlets and reported to PNICC is slightly larger than the number referenced in the report prepared by the ERO and RO for Tower Hamlets. This is because of some differences in the recording methodology, which means that one case of a group of allegations included in the report prepared by the ERO and RO for Tower Hamlets is listed as five separate cases in the report submitted to PNICC.

The MPS identified three cases involving five allegations where there was evidence to suggest that an offence may have been committed, but where there was insufficient evidence to prove an offence or identify a suspect.

2.8 These cases involved allegations that six postal votes had been cast by non-existent or fictitious electors. Investigation by the MPS did not identify potential suspects, and the MPS considered that submitting the returned postal ballot packs for forensic analysis would be unlikely to assist identification of suspects.

2.9 In one of these cases the residents of the property where two postal votes were alleged to have been sent to and returned from were visited by officers investigating the allegation. They denied that they had applied to vote by post but would not agree to assist further with the enquiry. While it was possible that an offence may have been committed, the MPS was unable to substantiate the allegations or identify any potential suspects.

2.10 In a second case, the property where two postal votes had been sent to and returned from contained individually rented rooms with a high turnover of residents. The personal identifiers provided on the postal voting statements which were returned with the ballot papers for the 19 April by-election did not match those held by the ERO on the original application to vote by post – the ballot papers were therefore not counted. While the MPS investigation confirmed that the two electors whose postal ballot packs were returned were no longer resident at the address, it was not able to identify any potential suspects.

2.11 In the third case, the property where two postal votes had been sent to and returned from was confirmed as empty by the MPS investigation. It was not possible, however, to identify any potential suspects.

The MPS identified 13 cases involving 44 allegations of false registrations where the information held by the ERO was found to be accurate, and there was no evidence of any offences having been committed.

2.12 In these cases investigation by the MPS involving visits to properties confirmed that complaints about the electoral register containing false or inaccurate entries were not correct, and that the electoral registration or postal vote information held by the ERO was in fact accurate.

2.13 In two cases those making these allegations appear to have been using electoral registers or lists of postal voters used for canvassing by campaigners that were not the most recent versions and were therefore inaccurate. In two further cases the MPS investigations required the use of an interpreter, and interviews with alleged victims using an interpreter contradicted the original allegations.

2.14 The MPS confirmed that they could find no evidence that offences had been committed in these cases.

The MPS identified 48 other cases involving 105 allegations where there was no evidence that an offence appeared to have been committed.

2.15 In these cases investigation by the MPS, involving visits to properties and interviews with residents, confirmed that the alleged offences had not taken place. These included cases where it was alleged that electors who were contacted at their homes by campaigners during the weeks before polling day for the May 2012 elections had claimed that they were not aware of having applied to vote by post; that electors' uncompleted postal ballot packs had been collected by rival campaigners; and that electoral register entries were either false or inaccurate.

2.16 In five of these cases the MPS investigations required the use of an interpreter, and interviews with alleged victims using an interpreter contradicted the original allegations. In 12 cases those making these allegations appear to have been using electoral registers or lists of postal voters (also used for canvassing by campaigners) that were not the most recent versions and therefore inaccurate.

2.17 In 16 of these cases, the MPS investigation indicated that electoral register entries appeared to be inaccurate. However, information provided by the RO for Tower Hamlets confirmed that no votes had been cast by or on behalf of the electors to whom these inaccurate entries related. Five cases related to addresses where subsequent enquiries established that the registered voters had moved out after completing the annual canvass form in autumn 2011 and prior to the 2012 elections.

2.18 The MPS found no evidence to support two specific cases referred to in a number of media reports involving allegations of a prisoner casting a vote and a vote being cast by a dead voter. Specific allegations were reported on 21 April 2012 that a prisoner on remand awaiting trial had cast a vote in the

Spitalfields and Banglatown ward by-election on 19 April. The blog also alleged that another person who had voted in the by-election was said to have died before the election. These two allegations were repeatedly referenced in other reports published during April and May 2012, and were also referred to in one of the complaints submitted directly to the Electoral Commission.

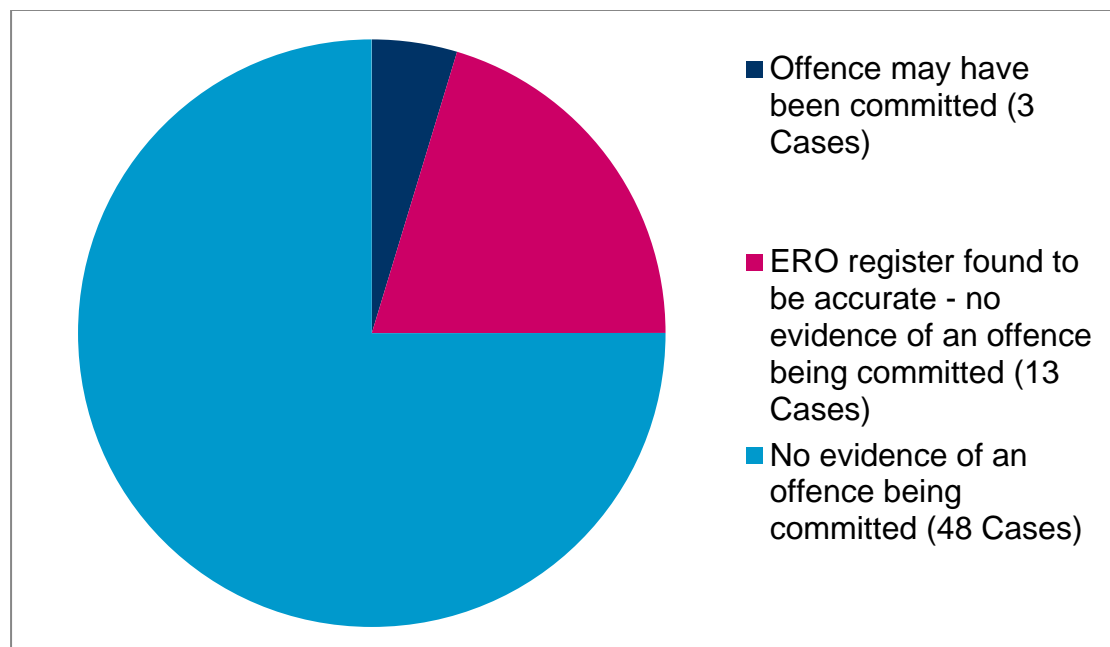
2.19 Investigation by the MPS, which included liaison with the prison service, established that a previous resident at the address referred to in the blog was on remand awaiting trial. As this individual was no longer resident or registered to vote in Tower Hamlets, no offence was found to have been committed. In any event, prisoners on remand are entitled to vote until they are convicted.

2.20 Following interviews with the family of the voter said to have died before the election, the RO for Tower Hamlets found that the elector had gone abroad after having completed and returned his postal ballot, and had died while abroad. As such, no offence was found to have been committed.

2.21 The MPS confirmed that they could find no evidence that offences had been committed in either of these cases.

2.22 Chart 1 below shows the breakdown of outcomes for the 64 cases investigated by the MPS in relation to Tower Hamlets in 2012.

Chart 1: Breakdown of outcomes for cases of alleged electoral fraud in relation to Tower Hamlets in 2012



3 Key issues arising from our analysis

3.1 We have identified a number of relevant issues arising from our analysis of the MPS investigations into the cases of electoral fraud reported in relation to Tower Hamlets in 2012.

Scale of investigation into the allegations

3.2 Investigations into the 64 cases of alleged electoral fraud in Tower Hamlets in 2012 involved a significant commitment of resource from both the MPS and the staff of the ERO and RO for Tower Hamlets. Each allegation was investigated individually over a period of several months.

3.3 The investigations involved visiting more than 60 properties where offences were alleged to have been committed, and interviews with residents, victims and alleged suspects. Police also sought information from the ERO and RO for Tower Hamlets, and local agencies including housing associations, charities and the prison service. The ERO and RO for Tower Hamlets also carried out checks on local authority council tax records and conducted enquiries at addressees.

Scale of evidence of electoral fraud

3.4 Despite the large number of cases of alleged electoral fraud in Tower Hamlets which were reported to and investigated by the MPS, only a small number of allegations have been substantiated by evidence or statements by victims or witnesses. Investigations by the MPS and the ERO and RO for Tower Hamlets has identified no evidence to suggest that there was any large scale attempt to affect the outcome of any of the April and May 2012 elections in Tower Hamlets.

3.5 Nevertheless, it is important to recognise that the MPS did identify three cases where they thought electoral fraud may have taken place in relation to the April and May 2012 elections in Tower Hamlets. In those cases two legitimate electors may have been deprived of their right to vote, and close election results could have been subject to challenge.

3.6 It is also important to recognise that even one case of proven electoral fraud can damage confidence in the integrity of elections.

Allegations based on misunderstandings or out of date information

3.7 Many allegations investigated by the MPS in relation to the 2012 elections in Tower Hamlets may have resulted from misunderstandings in

initial conversations between campaigners and individual electors, or from campaigners using out of date electoral registers and lists of postal voters to check the eligibility of electors.

3.8 In particular, some concerns about electors who it was alleged had been registered as postal voters without their knowledge arose from campaigners legitimately scrutinising the electoral register and absent voters list, but it was found that the versions of those lists that they used were out of date.

3.9 Elected representatives, candidates, registered political parties and local constituency parties can request copies of the current version of the absent voting record during the period leading up to the election, and are also entitled to receive copies of the final list to be used at a particular election. Mistaken allegations are less likely to be made if campaigners ensure they have requested the most up to date lists of postal voters from the ERO when they canvass properties. EROs could also take a more proactive approach to providing updated information to campaigners in order to avoid these kinds of misunderstandings in future. The ERO for Tower Hamlets would also have been able to provide information directly to campaigners to confirm or dismiss these allegations if concerns had first been raised with them.

Local demographic factors

3.10 The MPS investigation into the allegations made in Tower Hamlets has highlighted the challenges of maintaining complete and accurate electoral registers in an area which is densely populated with an often transient population. Census data indicates that Tower Hamlets is ranked 4th highest among local authorities in England and Wales for density of population (at 128.5 people per acre).⁴ The borough is also ranked highly for population mobility, with estimates of nearly a quarter of residents changing address each year. Some properties in Tower Hamlets have a large number of residents who are legitimately registered to vote, which can lead to suspicions of fraudulent activity.

3.11 The nature of the population in Tower Hamlets also appears to have had an impact on allegations reported to the police in relation to the April and May 2102 elections. The borough has a very diverse population, including nearly a third of residents who are Bangladeshi. Some allegations appear to have resulted from conversations between campaigners and residents which were subsequently contradicted by the residents when interviewed by police investigators using interpreters. Other allegations that individuals had multiple entries in the electoral registration for the same address were investigated by the MPS, but were found to relate to different people who were each individually eligible to be registered, who had identical first names and surnames but different middle names.

⁴ Based on 2011 census data.

Responding to allegations

3.12 Elected representatives and the media were rightly concerned about allegations of electoral fraud in Tower Hamlets, and it was important to highlight the nature of those concerns where they were raised.

3.13 However, the MPS and the ERO and RO for Tower Hamlets were not always able to respond directly to allegations which were referenced in media articles but which had not been reported to them. Police forces require specific complaints to be made to be able to open formal investigations, and without substantiated allegations it may be difficult for those complaints to be fully investigated. Police forces are also reluctant to comment on on-going investigations once specific allegations have been made.

3.14 Similarly, the ERO and RO for Tower Hamlets attempted to provide information directly in response to specific allegations about inaccurate electoral registers or lists of postal voters, but in many cases this was only possible after the allegations had already been published. Specific concerns or allegations had not always been made directly to the ERO or RO at the time they were referenced in media articles.

3.15 We have recently issued a revised code of conduct for campaigners, which has been agreed with the political parties represented on the House of Commons Parliamentary Parties Panel.⁵ The revised code makes clear that campaigners who are concerned or think that electoral fraud may have taken place should first raise the matter with their election agent or local party, or with the relevant ERO or RO for the area. They may be able to explain whether or not an election-related crime has been committed, and refer it to the police if appropriate or provide details of the police contact for the relevant area so that campaigners can report their allegation.

Key relationships

3.16 We have heard concerns about a breakdown in confidence and trust between some elected representatives and the ERO and RO for Tower Hamlets, and scepticism about the MPS investigations. We recognise that some of these tensions may have arisen from local political disagreements, but it is clear that these wider tensions also had an impact on the election campaign environment in April and May 2012.

3.17 This apparent breakdown in trust appears to have intensified concerns about allegations of electoral fraud in Tower Hamlets, and limited the capacity of the ERO and RO and police to respond to allegations and provide reassurance about their approach to preventing and detecting electoral fraud.

⁵ See Appendix C. Also available to download from the Electoral Commission's website at: http://www.electoralcommission.org.uk/_data/assets/pdf_file/0006/154176/Code-of-conduct-campaigners-2013.pdf

4 Recommendations for improving trust and confidence in the integrity of elections in Tower Hamlets

4.1 Our analysis of the cases of alleged electoral fraud reported in Tower Hamlets in 2012 highlights the need for some significant changes in the approach to reporting and investigating allegations in future. These changes will require action from the ERO and RO in Tower Hamlets and also from the MPS, but they will also need to be supported by commitments from political parties, candidates and campaigners. Without taking steps now to begin rebuilding confidence and trust between the key participants in the election process, we are concerned that the May 2014 local elections will again be damaged by allegations of electoral fraud.

4.2 This section sets out our recommendations for the ERO and RO for Tower Hamlets, for the MPS, and for candidates, political parties and campaigners. It also sets out the actions the Electoral Commission will be taking to support and monitor the progress of these recommended changes.

Recommendations for the ERO and RO in Tower Hamlets

4.3 We reviewed the plans and approach of the ERO for Tower Hamlets in March 2012, and found that the necessary plans and procedures were in place to identify patterns of activity that might indicate electoral malpractice, and that the ERO took reasonable and necessary steps to ensure that the register was as complete and accurate as possible. We noted that the procedures in Tower Hamlets exceeded current practices in the majority of other London boroughs and local authorities throughout the UK. We nevertheless identified several areas where further improvements could be made, including strengthening procedures for removing names from the register and highlighting the ability for existing electors and others to object to entries on the register.

4.4 However, there are further lessons to be drawn from the police investigations and the ERO and RO for Tower Hamlets now need to take further steps to ensure their approach to preventing and detecting electoral fraud is as thorough and robust as possible. They also need to take specific steps to improve confidence in their approach for future elections, particularly among elected representatives, candidates and campaigners.

Recommendation 1: Improving electoral registration and election integrity processes in Tower Hamlets

The Electoral Registration Officer and Returning Officer for Tower Hamlets should immediately commence a review of all current electoral registration and election integrity processes to identify opportunities for further improvements to monitor potential electoral registration or voting fraud; to increase their capacity to respond to allegations of electoral fraud; and to improve transparency about their electoral integrity approach.

This review should include both year-round procedures for monitoring electoral registration and postal or proxy vote applications, as well as election-specific activities:

- Planning and staffing electoral registration canvass activities
- Thresholds and triggers for further checks on registrations and postal or proxy vote applications
- Use of objections and review process for registration applications and existing entries
- Risk and threat assessment for individual polling stations
- Operational planning with the MPS in advance of elections
- Providing accessible information about monthly alterations to the electoral register and lists of absent voter to elected representatives and others who are entitled to receive them
- Establishing agreed procedures for receiving, investigating and escalating complaints about electoral register inaccuracies
- Communicating widely and publicly a joint commitment with the MPS to preventing and detecting electoral fraud, supported by information about electoral integrity plans.

To provide assurance to elected representatives, political parties and campaigners in Tower Hamlets, the ERO and RO should provide regular updates on progress towards making these changes. This information should be made publicly available wherever possible, to support improved transparency about the integrity of electoral registration and election processes.

The Electoral Registration Officer and Returning Officer for Tower Hamlets should publish details of their plans for reviewing electoral registration and electoral integrity activities for the May 2014 elections **not later than the end of May 2013**.

We will review these plans **by the end of July 2013** and identify clearly and publicly any additional actions we think are needed (see also Recommendation 4 below).

Recommendations for the Metropolitan Police Service

4.5 It is important to respect the operational independence of the MPS, and not to undermine its capacity to thoroughly investigate serious allegations. It should not be the Commission's role to comment on on-going investigations, but a more open and responsive approach by the MPS to informing complainants about their response to concerns about electoral fraud could help support confidence in the response to future allegations of electoral fraud.

4.6 We recognise that the MPS cannot initiate investigations into general allegations which are not supported by evidence or statements by witnesses or victims. We also understand that it is neither practical nor appropriate for the MPS to comment on every allegation made either directly or indirectly. People who have concerns about electoral fraud, however, will look to the MPS for reassurance that their complaints are dealt with appropriately.

Recommendation 2: Supporting confidence in future police investigations into allegations of electoral fraud

The MPS should review its plans for policing elections in 2014 in conjunction with the ERO and RO for Tower Hamlets. It should ensure that the plans published by the ERO and RO reflect the specific role of the MPS in relation to both operational policing in the Borough during the pre-election period, and also in dealing with and investigating allegations of electoral fraud. In particular, the MPS should, with the ERO and RO for Tower Hamlets, develop and publish a protocol for handling allegations of electoral fraud.

Given the considerable public interest in allegations of electoral fraud, the MPS should review its communication strategy for future elections to ensure there is an appropriate balance between informing individual complainants about the outcomes of investigations, and providing more general assurance that the police are responding to concerns about electoral fraud and thoroughly investigating allegations.

The MPS should ensure that it has completed an initial review of its plans in time to influence the review of planning by the ERO and RO for Tower Hamlets by the end of May 2013.

Recommendations for candidates, political parties and campaigners in Tower Hamlets

4.7 Campaigners are an essential element of a healthy democracy, and their right to put their arguments to voters should be supported and protected. It is equally important to ensure that the activities of campaigners do not bring into question or undermine the integrity of the electoral process.

4.8 We also recognise the important role of local campaigners in identifying electoral register inaccuracies and highlighting suspicious patterns of registration or absent vote applications. It is important however, to ensure that concerns are not escalated in a way which could undermine confidence in the electoral process, without first having been subject to appropriate initial checks to establish whether offences may in fact have taken place.

Recommendation 3: Ensuring consistent high standards for campaigners in Tower Hamlets

Elected representatives, political parties, candidates and campaigners in Tower Hamlets should **immediately make a clear public commitment** to following the Electoral Commission's *Code of conduct for campaigners*, which we have recently revised and re-issued.

The Code provides a guide for campaigners, electoral administrators and police forces to what is, and is not, considered acceptable behaviour at polling stations and in the community during the lead-up to polling day. It covers the role of campaigners in dealing with postal and proxy vote applications and postal voting ballot packs. The revised Code now also covers campaigning outside polling places.

The Code also sets out a recommended process for raising and dealing with complaints or allegations about electoral fraud, so that initial investigations can be carried out at the appropriate level by the ERO or RO before deciding to escalate complaints to the police.

The Code has been agreed by the political parties represented on the House of Commons Parliamentary Parties Panel, and has been sent to all registered political parties in Great Britain. We have asked ROs to ensure that all candidates and parties contesting elections are aware that the Code applies to them, including independent candidates, and we expect the RO for Tower Hamlets to do so in advance of the May 2014 elections.

We will consider any concerns raised with us that the Code has been breached, and will agree appropriate actions to remedy or prevent a reoccurrence of any breach where necessary. We will publish details of any breaches of the Code in our annual election reports.

Individual candidates at future elections should also make a public commitment to following the Code.

Actions for the Electoral Commission

4.9 The Electoral Commission has a unique role in relation to allegations of electoral fraud: we are not responsible for delivering electoral administration processes, nor are we responsible for investigating allegations. Nonetheless, we recognise that people may look to us to provide assurance that effective procedures are in place to prevent and detect electoral fraud, and that allegations are treated with the seriousness they deserve.

Recommendation 4: Improving accountability for the effectiveness of electoral integrity activity

We will monitor closely the plans and approach of the ERO and RO in Tower Hamlets and the MPS during the 12 months leading up to the May 2014 elections, to ensure that what they propose will be an effective response to improve confidence in the integrity of future elections.

We will review and comment on any plans published by the ERO and RO for Tower Hamlets in May 2013, including actions agreed with the MPS, and will monitor progress towards delivering that plan.

If we are not satisfied that the right measures have been identified or implemented we will make clear what further actions need to be taken by the ERO, RO or by others.

We will publish our first progress report on the actions taken by the ERO and RO for Tower Hamlets **by the end of July 2013**.

We will also share the key lessons learned from this analysis with EROs, ROs, police forces and campaigners through our regular electoral integrity roundtable meetings. We will also incorporate the lessons into our framework of guidance and standards for EROs and ROs, and in our guidance for police forces.

Appendix A – Results of by-elections in Tower Hamlets April and May 2012

Spitalfields and Banglatown by-election, 19 April 2012

Kirsty BLAKE	Green Party	99 votes
Richard Alan MACMILLAN	Liberal Democrats	39 votes
Gulam ROBBANI	Independent	1,030 votes
Matthew James SMITH	Conservative Party	140 votes
Ala UDDIN	Labour Party	987 votes

Turnout 31.4%

Weavers ward by-election, 3 May 2012

Alan DUFFELL	Green Party	373 votes
Caroline June KERSWELL	Conservative Party	415 votes
Azizur RAHMAN	Liberal Democrats	208 votes
Abjol MIAH	Respect	1,260 votes
John Paul PIERCE	Labour Party	1,544 votes
Oli ROTHSCHILD	Independent	36 votes

Turnout 44.6%

Appendix B – Cases of electoral fraud recorded by the Metropolitan Police Service in relation to Tower Hamlets 2012

Case number ⁶	Category	Summary title and RPA 1983 reference	Outcome	Allegations	Election type	Metropolitan Police Service case summary
Case 05	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	1	Local government by-election	Alleges elector had voted although he was prison. A previous resident at the address was on remand but now lives in another borough and is no longer on the electoral register for Tower Hamlets. The elector did not vote. No offence.

⁶ Refers to the case number within the overall set of cases recorded by the Metropolitan Police Service across London and reported through the Police National Information Coordination Centre (PNICC). The numbering of cases in this table may not be consistent with other reports of cases in relation to Tower Hamlets. Cases 1 to 4 and cases 20 and 32, which are not shown in this table, relate to other London boroughs. Case 19 was a duplicate of case 18, and is therefore not shown in this table.

Case 06	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	1	Local government by-election	Alleges elector had died abroad during by-election yet had voted by post. The local authority checked with the family and found that the elector had gone abroad after having cast his postal vote and died whilst overseas. The vote is considered to be properly cast. No offence.
Case 07	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	1	Local government by-election	Alleges false application to vote by post as elector at property was not aware of being a postal voter. Police, through an interpreter, established that the elector had voted by post without any problems. No offence.
Case 08	Registration	13D (1A) False application (i) postal voting	No further action - undetectable	2	Local government by-election	Alleges occupant said that two electors, shown on register as postal voters, did not reside at property. Two postal votes were cast at by-election. The ballot papers were rejected but not suitable for forensic testing. Police called at the property and spoke to two occupants but were unable to identify a potential suspect. No further action - undetectable. No elector at the property voted in the GLA elections. Current occupants are ineligible foreign nationals.

Case 09	Registration	13D (1) False information	No further action - no offence	4	Local government by-election	Alleges four electors, registered to vote by post, do not reside at a property. This was confirmed by residents. The owners have moved out temporarily to care for sick relative but still regard the property as their main residence and vote by post. Referred to the CPS who assessed no offence had been committed on the evidence provided. The persons were entitled to vote from the address.
Case 10	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	2	Local government by-election	Alleges two people voted by post from property that appears empty. The empty property is indistinguishable from an adjoining block which has a different name. The two named electors live in the adjoining block where they are registered. Possibly an administrative error. No offence.

Case 11	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - undetected	2	Local government by-election	Alleges postal votes were cast by two people who appear on the register as living at an empty property. Police confirmed that the property appeared empty and two votes were cast. The investigation concluded that the inclusion of these names on the register may be due to an administrative error. The names have been removed from the register. No further action - undetectable.
Case 12	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - undetected	1	Local government by-election	Alleges the two electors named on the register as postal voters were not resident at the property. Council pre-printed 2011 canvass forms were signed and returned. Both residents deny they signed the forms. This is an offence however the victims would not assist police and the offenders may be undetectable. Names removed from register.

Case 13	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	8	Local government by-election	Alleges only two people reside at property where eight people are registered. This allegation was highlighted in both the broadcast and written media and made on more than one occasion. Council staff visited property shortly before the election and were told that all eight still reside. Police visited the property with an interpreter and also concluded that eight people resided there. Although all were registered to vote by post, records show that no vote was cast in the name of any of these electors in either the by-election or local elections. No offence.
Case 14	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	1	Local government by-election	Alleges postal vote application by elector who had married and moved away. Police called at property. Elector has been spoken to with an interpreter. Elector says that they married 18 months ago and their in-laws live in another borough. Elector resides at the property but not full time. Elector did vote by post, signed the form and posted it personally. No offence.

Case 15	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	1	Local government by-election	Alleges people collecting the registered occupier's postal vote. Alleged victim spoke to by police with an interpreter. Elector stated that they did vote by post voluntarily. No allegations made and voter had no problems. No offence. Although it is against the Code of conduct to collect postal ballots, it is not an offence.
Case 16	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	4	Local government by-election	Councillor alleges an irregularity with the votes of two people arising from a complaint by their son. Police spoke to the occupier with the aid of an interpreter who said that it was a misunderstanding by the councillor. His parents had voted properly. There was no offence.
Case 17	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	2	Local government by-election	Alleges an irregularity where someone had told the occupier to sign a form and took the form away. The police spoke to the occupier who said that all electors at the property have voted without any problems and there are no allegations made. No offence.

Case 18	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	2	Local government by-election	Alleges possible error in electoral register and an elector claiming that somebody had used their vote. Police enquiries confirmed that this was not the case and that the elector had cast their vote correctly. No offence. No further action.
Case 21	Registration	13D (1) False information	No further action - no offence	4	GLA and local government by-election	Alleges the four electors named on the register as postal voters were not resident at the property. Electoral records show four electors voting by post at GLA and local elections in May. Council tax records show four electors vacating property in July 2012. They were deleted from register in August 2012. No offence.
Case 22	Registration	13D (1) False information	No further action - no evidence	9	Non-election specific, e.g. rolling registration	Alleges nine electors registered at two properties may not reside. One name deleted effective from August 2012. One polling station voter and seven electors voted by post at by-election. None voted at GLA elections. Seven of the named electors still resident at property on 2013 Register. No evidence.

Case 23	Registration	13D (1) False information	No further action - no evidence	3	Non-election specific, e.g. rolling registration	Alleges three electors registered to voter by post at one property may not reside. All three voted at the GLA and by-election. Three electors plus one confirmed on 2013 Register. Police enquiries show no offences identified. No offence.
Case 24	Registration	13D (1) False information	No further action - no evidence	7	Non-election specific, e.g. rolling registration	Alleges seven electors, four of whom are registered to vote by post, at one property may not reside. None voted in the GLA elections and six voted in the by-election. All seven electors confirmed at property for 2013 register. No offence identified.
Case 25	Registration	13D (1) False information	No further action - no evidence	8	Non-election specific, e.g. rolling registration	Alleges eight electors, four of whom are registered to vote by post, at one property may not reside. None voted in the GLA elections but four voted in the by-election. Four electors confirmed at property for 2013 register. No offence identified.
Case 26	Registration	13D (1) False information	No further action - no evidence	6	GLA and local government by-election	Alleges six electors all registered to vote by post at one property may not reside. All six voted in the GLA elections and the by-election. Two names deleted effective August 2012. Remaining four named electors confirmed at property for 2013 register. No offence identified.

Case 27	Registration	13D (1) False information	No further action - no evidence	3	Local government by-election	Alleges three electors all registered to vote by post at one property may not reside. All three voted in by-election and none voted in the GLA elections. Three electors confirmed at property for 2013 register, two named electors are unchanged. No offence identified.
Case 28	Registration	13D (1) False information	No further action - no evidence	4	Non-election specific, e.g. rolling registration	Alleges four electors at one property may not reside. Four voted in by-election and three in GLA elections. 2013 canvass shows three named electors still reside and one has been deleted. No offence
Case 29	Registration	13D (1) False information	No further action - no evidence	3	Non-election specific, e.g. rolling registration	Alleges three electors at one property may not reside. 2012 canvass confirmed the three named electors were still in residence. No offence.
Case 30	Registration	13D (1) False information	No further action - no evidence	1	Local government by-election	Alleges that party workers visited a property, spoke to the electors, opened the postal ballots and encouraged the occupants to vote. Possible breach of Code of conduct by party workers. Occupants unwilling to provide statements to Police. No offences disclosed. No further action.

Case 31	Registration	13D (1) False information	No further action - no offence	1	Local government by-election	Alleges next door neighbour's registration was inaccurate as there was only one person living at the address. No vote was cast. No offence.
Case 33	Registration	13D (1) False information	No further action - no evidence	1	GLA and local government by-election	Alleges two people on register voted by post in GLA and local election but did not reside at property. Property found to be vacant. No response to 2013 canvass. Names removed from register. No evidence to suggest occupants were not entitled to vote at the time. No offence apparent.
Case 34	Registration	13D (1) False information	No further action - no offence	5	Non-election specific, e.g. rolling registration	Alleges five people on register to vote by post at one property had moved away. Council records show them still paying council tax in May 2012. No offence.
Case 35	Registration	13D (1) False information	No further action - no offence	5	Non-election specific, e.g. rolling registration	Alleges five people on register to vote by post at one property had moved away. Four of five were registered to vote by post. Moved Nov 2011 (Council tax noted). No postal voters voted. One person who was entitled to vote did so at polling station. Five names deleted from register in Jun 2012 - property empty.

Case 36	Registration	13D (1) False information	No further action - no offence	7	GLA and local government by-election	Alleges seven people registered to vote at property who no longer reside. Four names deleted effective for May elections. No vote cast in any of the seven names at May elections. No offences.
Case 37	Registration	13D (1) False information	No further action - no offence	4	Non-election specific, e.g. rolling registration	Alleges four people registered to vote at property do not reside. New registration cards sent to address. Four electors voted at polling station. One person shown on council tax (does not say if sole resident). No offence.
Case 38	Registration	13D (1) False information	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges one person registered twice. Investigations showed two electors at same property with same first and last name but different middle names. No offence.
Case 39	Registration	13D (1) False information	No further action - no offence	2	Non-election specific, e.g. rolling registration	Alleges one person registered three times at one property. Investigations showed three electors at property with same first and last name but different middle names. No offence.
Case 40	Registration	13D (1A) False application (i) postal voting	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges that resident was unaware of anyone using postal vote at property. Register checked and nobody registered to vote by post at property. No offence.

Case 41	Registration	13D (1A) False application (i) postal voting	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges that resident was unaware of anyone using postal vote at property. Register checked and nobody registered to vote by post at property. No offence.
Case 42	Registration	13D (1) False information	No further action - no offence	6	Non-election specific, e.g. rolling registration	Alleges one person registered three times at one property. Police investigations showed three electors at the property with same first and last name but different middle names. No offence. Allegation queries that there are nine electors at property. One person deleted before May 2012 elections. One person underage - administrative error. Two electors deleted in August 2012. Five valid electors confirmed at 2012 canvass. No-one voted in person or by post at the 2012 elections.
Case 43	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	8	GLA and local government by-election	Alleges postal ballot packs were left in communal hallway serving eight flats and therefore at risk. Postal ballot packs delivered by Royal Mail to flats. No offences alleged.

Case 44	Registration	13D (1) False information	No further action - no offence	6	Non-election specific, e.g. rolling registration	Alleges six residents had moved away but were still on register. None of six names were marked as having cast a vote in 2012 elections. Non-response at 2012 canvass. All deleted as non-responders. No offences apparent.
Case 45	Registration	13D (1A) False application (i) postal voting	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges a postal voter was registered at address without the resident's knowledge. No postal vote registration for this address. No offence.
Case 46	Registration	13D (1A) False application (i) postal voting	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges resident was unaware of a postal vote recorded for the address. Register shows residents as polling station voters. No response to 2012 canvass and electors removed. No offences apparent.
Case 47	Registration	13D (1A) False application (i) postal voting	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges the resident was unaware they were shown as a postal voter. Police spoke to elector with an interpreter. They stated that they were registered to vote as a postal voter and had had no difficulty in voting. No offence.

Case 48	Registration	13D (1A) False application (i) postal voting	No further action - no offence	2	Non-election specific, e.g. rolling registration	Alleged there were persons resident at these establishments who were shown as postal voters. Electoral services visited spoke to the manager and several residents. All details confirmed as correct. No offences identified.
Case 49	Registration	13D (1) False information	No further action - no offence	2	Non-election specific, e.g. rolling registration	Party workers reported that the previous occupants had moved out. No allegation. Electoral services made enquiries, deleted two registered electors and sent out new registration forms to the address. No elector voted from this address. 2012 canvass shows new resident. No offence.
Case 50	Registration	13D (1) False information	No further action - no offence	6	Non-election specific, e.g. rolling registration	Party workers reported that six registered electors had moved out of the property. Electoral services deleted all residents from the register before elections and sent out new registration forms. Nobody voted from this property at May elections. No offences.
Case 51	Registration	13D (1) False information	No further action - no offence	3	Non-election specific, e.g. rolling registration	Alleges that three electors were due to leave the country. Four names deleted from register. None voted in the elections. No offences were identified.

Case 52	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	1	GLA and local government by-election	Alleges elector at a property had not received their ballot paper. No offences alleged. Electoral services delivered replacement postal vote to the address in time for the elections. No offence.
Case 53	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	1	GLA and local government by-election	Alleges elector at a property had not received their ballot paper. No offences alleged. Electoral services delivered replacement postal vote to the address in time for the elections. No offence.
Case 54	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	1	GLA and local government by-election	Alleges elector at a property had not received their ballot paper. No offences alleged. Electoral services delivered replacement postal vote to the address in time for the elections. No offence.
Case 55	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	1	GLA and local government by-election	Alleges elector at a property had not received their ballot paper. No offences alleged. Electoral services delivered replacement postal vote to the address in time for the elections. No offence.

Case 56	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	1	GLA and local government by-election	Alleges electors at a property had not received their ballot paper. Electoral services delivered replacement postal votes to the address in time for the elections. No offences alleged. No offence.
Case 57	Registration	13D (1) False information	No further action - no offence	3	Non-election specific, e.g. rolling registration	Party workers stated that previous residents were still listed on the register. Electoral services spoke to residents and confirmed accuracy of register. No allegations of crime made. No offence.
Case 58	Registration	13D (1A) False application (i) postal voting	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges that elector at property was not aware of being a postal voter. Electoral services confirmed the occupant was not registered as a postal voter. No offence
Case 59	Registration	13D (1) False information	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges that registered elector at a property had died. Electoral services removed elector's name from the register. It was also alleged that the elector was listed as a postal voter but this was incorrect. No offences.
Case 60	Registration	13D (1A) False application (i) postal voting	No further action - no offence	2	Non-election specific, e.g. rolling registration	Alleges that two residents at a property were allegedly unaware of being registered as postal voters. Electoral services confirmed that neither was registered to vote by post. No offence.

Case 61	Registration	13D (1) False information	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges that elector at property has died. Electoral services stated they had already removed the name from the register. It was also alleged that the elector was listed as a postal voter but this was incorrect. No offences.
Case 62	Registration	13D (1) False information	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges the electoral register was inaccurate. Police enquires discovered one occupant had recently moved out. Information passed to electoral services and name removed from the register for May 2012. No-one voted in the Spitalfields by-election or at May elections.
Case 63	Registration	13D (1) False information	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges possible register inaccuracy as no response to party workers at one property. Four residents voted by post in the Spitalfields by-election. Currently no registrations to vote at this address. No offences apparent.
Case 64	Registration	13D (1) False information	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges possible register inaccuracy as no response to party workers at one property. Referred to Electoral services. No associated resident voted in by-elections or GLA elections. No offences.

Case 65	Registration	13D (1) False information	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges possible register inaccuracy as no response to party workers at one property. Referred to Electoral services. No associated resident voted in by-elections or GLA elections. No offences.
Case 66	Registration	13D (1) False information	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges that occupant was deceased but registered to vote as postal voter. Electoral services updated the register. No vote cast in deceased's name in the elections. No offences apparent.
Case 67	Registration	13D (1A) False application (i) postal voting	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges that party worker called at property and occupant stated postal voters did not reside. Police attended the address. 12 people were resident. Some had resided at address for two years and were registered to vote at polling station. Others were found to be transient. No evidence of any offences under the Representations of Peoples Act. No postal votes were cast. Two votes were cast by electors who were resident at the time. No offences apparent.

Case 68	Voting	60-62 and 62A Personation/legal incapacity to vote/multiple voting (i) Postal vote	No further action - no offence	1	GLA and local government by-election	Alleges two party workers called at property and took away family's polling cards. Police spoke to occupant who stated these party workers and others called at the address asking about voting. Occupant confirmed nobody took away any polling cards. The family at the address voted and had no problems. No offences identified.
Case 69	Registration	13D (1A) False application (i) postal voting	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges that six postal voters are registered at a property although it is empty. Register updated by local authority. No postal votes associated with this address were cast. No offences.
Case 70	Registration	13D (1A) False application (i) postal voting	No further action - no offence	1	Non-election specific, e.g. rolling registration	Alleges that occupant of property was unaware they were registered as a postal voter. Electoral services confirmed the occupant was not registered as a postal voter. No offence.

Case 71	Registration	13D (1) False information	No further action - no offence	2	Non-election specific, e.g. rolling registration	Alleges two people on register voted in GLA and local election but did not reside at property, one was registered to vote by post. Electors moved out in Jan 2012. No vote cast in either name. Third person on register is resident and voted in person. No further action. No offence.
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Appendix C – Code of conduct for campaigners: postal voting, proxy voting and polling stations

Campaigners are an essential element of a healthy democracy, and their right to put their arguments to voters should be supported and protected. It is equally important, however, to ensure that the activities of campaigners do not bring into question the integrity of the electoral process.

This Code provides a guide for campaigners, electoral administrators and police forces to what is, and is not, considered acceptable behaviour at polling stations and in the community during the lead-up to polling day.

As a guiding principle, if there is any doubt about a particular activity, campaigners should ask themselves “What would a reasonable observer think?”

More detailed guidance about electoral offences can be found in the full guidance published jointly by the Electoral Commission and the UK’s Associations of Chief Police Officers, which is available on our website at:

<http://www.electoralcommission.org.uk/guidance/resources-for-electoral-administrators/integrity-guidance/electoral-events>

This Code has been agreed by the political parties represented on the House of Commons Parliamentary Parties Panel and the panels for the Scottish Parliament and the National Assembly for Wales, and is endorsed by the members of the Electoral Commission’s UK Electoral Advisory Board of senior Returning and Electoral Registration Officers and Electoral Integrity Roundtable.

The Code has been sent to all registered political parties in Great Britain, and Returning Officers will draw it to the attention of all candidates and parties contesting elections.

Scope of this code

This code covers all those actively involved in campaigning in elections or referendums in Great Britain. All references to campaigners in this code include:

- Candidates standing at an election, their agents and their staff and supporters
- Political party officers, members and supporters campaigning at an election
- Other people and organisations campaigning for or against a candidate, a group of candidates or a party at an election
- People and organisations campaigning for or against a particular outcome at a referendum

Compliance with this code

Any concerns that this code has been breached should be raised first with the candidate, political party or campaigner in question.

Any further concerns should be drawn to the attention of the Electoral Commission. The Commission will raise them with the relevant party or campaigner if appropriate, and will agree appropriate actions to remedy or prevent a reoccurrence of any breach.

1 Postal and proxy vote applications

- 1.1 Campaigners should ensure that any bespoke postal or proxy voting application forms conform fully to the requirements of electoral law, including all the necessary questions and the options open to electors.**

Campaigners can download a template form from our website at:

https://www.aboutmyvote.co.uk/register_to_vote/postal_vote_application/blank_postal.aspx

- 1.2 Campaigners should always explain to electors the implications of applying to vote by post or appointing a proxy.**

It is important that electors understand that they will not be able to vote in person on polling day if they or their proxy apply for and are granted a postal vote, and will not be able to vote in person if their appointed proxy has already voted on their behalf. To avoid duplication and unnecessary administrative pressures for Electoral Registration Officers, campaigners should try to ensure that electors who are included in current postal or proxy voter lists, or have already applied for a postal or proxy vote for a particular poll, do not submit an additional application.

Postal vote applications

- 1.3 Campaigners should not encourage electors to have their postal ballot pack redirected to anywhere other than the address where they are registered to vote.**

Electors should take care to protect their ballot paper and postal ballot pack, and they will be best able to do so at their home address unless there are compelling reasons why receiving the postal ballot pack at the address where they are registered to vote would be impractical. Electors must state on the application form the reason why they need their postal ballot pack sent to another address.

1.4 Campaigners should ensure that the local Electoral Registration Officer's address is provided as the preferred address for the return of absent vote application forms.

To minimise the risk of suspicions that completed applications could be altered or destroyed, campaigners should always provide the relevant Electoral Registration Officer's address as the preferred return address, even if an alternative address is also given.

1.5 Campaigners should send on unaltered any completed application forms given to them to the relevant Electoral Registration Officer's address within two working days of receipt.

To minimise the risk of absent vote applications being refused because completed forms arrive with the Electoral Registration Officer after the statutory deadline before a poll, campaigners must ensure that there is no unnecessary delay in forwarding on application forms which have been received directly.

Proxy vote applications

1.6 Electors should be encouraged to explore other options for people to act as a proxy – including relatives or neighbours, for example – before a campaigner agrees to be appointed as a proxy.

To minimise the risk of suspicions that campaigners may be seeking to place undue pressure on electors, electors should not be encouraged to appoint a campaigner as their proxy.

2 Postal voting ballot papers

2.1 Campaigners should never touch or handle anyone else's ballot paper.

If you are asked for assistance in completing a ballot paper, you should always refer the voter to the Returning Officer's staff at the elections office who may be able to arrange a home visit if necessary. Assistance will also be available for electors at polling stations.

2.2 Campaigners should never observe voters completing their ballot paper. If you are with a voter when they complete their ballot paper, remember they should always complete it in secret.

Equally, you should ensure that the voter seals both envelopes personally and immediately after completing their ballot paper and postal voting statement. If you are asked to give advice, it is acceptable and often helpful to explain the voting process, but do not offer to help anyone to complete their ballot paper.

2.3 Campaigners should not ask or encourage voters to give them any completed ballot paper or ballot paper envelope.

Wherever practical, the voter should be encouraged to post or deliver the completed ballot paper themselves. While campaigners may be approached for help by a voter who is unable to post their ballot paper or make arrangements for it to be returned in time, other options for delivering the postal ballot pack – including relatives or neighbours, for example – should be explored before a campaigner agrees to deliver a postal ballot pack.

2.4 If asked by a voter to take a completed postal ballot pack on their behalf, campaigners should immediately post it or take it directly to the office of the Returning Officer or to a polling station.

To ensure completed postal ballot papers are received by the Returning Officer before the close of poll, and to minimise the risk of suspicions that they could be altered or destroyed, campaigners should ensure that there is no delay in forwarding on postal ballot packs which have been given directly to them. Campaigners should not allow large numbers of completed postal ballots to accumulate before forwarding them to the Returning Officer or handing them in at an appropriate polling station.

3 Campaigning outside polling places

3.1 Campaigners should be allowed to put their messages to voters on polling day, including in public spaces outside polling places.

Polling station staff and police officers should not seek to discourage or remove campaigners who are otherwise peacefully communicating with voters, as long as they are not within or impeding access to the grounds of the polling place. Campaigners should be careful, however, to ensure that their approach is proportionate and should recognise that groups of supporters may be perceived as intimidating by voters.

3.2 Campaigners should keep access to polling places and the pavements around polling places clear to allow voters to enter.

The Presiding Officer is responsible for maintaining order in the polling place, and campaigners who appear to be impeding access by voters to a polling place may be asked to move by polling station staff or police officers.

4 Complaints and allegations about electoral fraud

4.1 Campaigners should be prepared to give the police a statement and substantiate any allegations of electoral fraud they make.

The police will investigate allegations where someone is prepared to provide evidence or a statement in support of the complaint, but unsubstantiated claims about electoral fraud have the potential to damage confidence in the integrity of the electoral process. Campaigners should ensure they are confident that evidence can be provided to the police before considering whether it is appropriate to publicise any specific allegation.

4.2 Campaigners who are concerned or think that electoral fraud may have taken place should raise the matter with their election agent or local party, or with the relevant Electoral Registration Officer or Returning Officer for the area.

They may be able to explain whether or not an election-related crime has been committed, and refer it to the police if appropriate or provide details of the police contact for the relevant area so that campaigners can report their allegation. Concerns about breaches of the political finance rules should be raised directly with the Electoral Commission.

4.3 Any campaigner who has actual evidence of an electoral offence having been committed should report it directly and without delay to the police.

If appropriate, the police will investigate the matter. Every police force has designated a Single Point of Contact (known as a SPOC) to lead on election matters and who will deal directly with the matter or give advice to local police officers. The Electoral Commission can help provide contact details for local police force SPOCs.

Agreed and effective from March 2013

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website.

We are an independent body set up by the
UK Parliament. We regulate party and
election finance and set standards for well-
run elections. We work to support a healthy
democracy, where elections and
referendums are based on our principles of
trust, participation, and no undue influence.

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