From: FOI
Sent: 10 May 2018 18:31
To: [redacted]
Subject: FOI 058/18 DUP Meetings Response

Dear [redacted],

Our Ref: FOI 058/18

Thank you for your email to the Electoral Commission dated 05 April 2018.

The Commission aims to respond to requests for information promptly and regrets that on this occasion we have not done so.

Your request is in bold below followed by our response.

1) The Electoral Commission held a meeting with DUP leader Arlene Foster on Thursday 18 May.

For this meeting, please provide the following:

- A full list of attendees, including the full names and titles of each attendee, as well as who each attendee represents

- The exact time, date and duration of when the meeting took place

- The location of the meeting

- A copy of the agenda for the meeting

- Materials that were handed out and received during the meeting, such as presentation slides, brochures, reports, and leaflets

- Minutes taken during the meeting, as well as any accompanying briefing notes and papers

2) Please indicate, from 1st September 2017 to the day this request is processed, any further meetings between representatives of the Electoral Commission and representatives of the DUP. For each meeting, please provide the following:

- A full list of attendees, including the full names and titles of each attendee, as well as who each attendee represents

- The exact time, date and duration of when the meeting took place

- The location of the meeting

- A copy of the agenda for the meeting

- Materials that were handed out and received during the meeting, such as presentation slides, brochures, reports, and leaflets

- Minutes taken during the meeting, as well as any accompanying briefing notes and papers

3) The Electoral Commission held a meeting with representatives of Sinn Fein around the same time as the meeting with DUP leader Arlene Foster (ie in or around May 2017).

For this meeting, please provide the following:

- A full list of attendees, including the full names and titles of each attendee, as well as who each attendee represents

- The exact time, date and duration of when the meeting took place

- The location of the meeting

- A copy of the agenda for the meeting

- Materials that were handed out and received during the meeting, such as presentation slides, brochures, reports, and leaflets

- Minutes taken during the meeting, as well as any accompanying briefing notes and papers

Our response is as follows:

We hold the information you have requested.

On 18 May 2017, Ann Watt (Head of the Electoral Commission, Northern Ireland) and Cahir Hughes (Senior Officer, Electoral Commission, Northern Ireland) met with Arlene Foster MLA at the DUP's offices in Parliament Buildings, Stormont. The meeting was at 11:30am and lasted around 30 minutes. An internal note of the meeting written by Ann Watt for Electoral Commission colleagues is attached.

The Electoral Commission holds regular quarterly meetings with representatives from the parties in the Northern Ireland Assembly. A DUP representative attends these meetings. The agenda, minutes and papers for these meetings on 3 October 2017 and 10 April 2018 are attached. The meetings are held at the Radisson Blu Hotel in The Gasworks in Belfast, beginning at 9:30am and lasting around one hour.

On 19 April 2018, Ann Watt and Roisin McDaid (Senior Officer, Political Parties Liaison, Northern Ireland) met with Timothy Johnston (DUP Chief Executive), Allan Ewart (DUP Councillor), Lee Reynolds (DUP Director of Policy), George Dorrian (DUP Senior Policy Officer) and Philip Weir (DUP Policy Officer) as part of the Electoral Commission's audit of the Policy Development Grant.

These were the only meetings the Electoral Commission held with DUP representatives during the period requested.

On 19 May 2017, Ann Watt and Cahir Hughes met with representatives from Sinn Fein (Paul Maskey MLA, Chris Hazzard MLA, Elisha McCallion MLA and Gary Fleming) at the Electoral Commission's office in Belfast. The meeting was at 10am and lasted around one hour. An internal note of the meeting written by Ann Watt for Electoral Commission colleagues is attached.

I trust that this information satisfies your request. The Commission strives to be an open, transparent authority.

If you are not satisfied with this response, please note that the Commission operates a review procedure, details of which can be found on the Commission website at: http://www.electoralcommission.org.uk/about-us/freedom-of-information-requests/how-do-I-make-an-foi-request

Please also note that if you have exhausted all internal Commission review procedures and you are still not satisfied you have the right to appeal to the Information Commissioner. Details of this procedure can be found on the ICO website: https://ico.org.uk/

Yours sincerely,

[redacted]
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Draft

Northern Ireland Assembly's Parties Panel
10 April 2018 – Radisson Blu Hotel, Belfast at 9.30 am

Present:

Alliance Party	Sharon Lowry
DUP	Lee Reynolds
SDLP	Catherine Matthews
Sinn Féin	Gary Fleming
Ulster Unionist Party	John Moore
The Electoral Commission	Anna Carragher, Commissioner Ann Watt, Head of Electoral Commission, Northern Ireland Ailsa Irvine, Director of Electoral Administration & Guidance Carol Sweetenham, Guidance and Strategy Leader Cahir Hughes, Senior Officer (Communications and Electoral Administration) Roisin McDaid, Senior Officer (Political Parties Liaison) Caralyn Morton, Business Support Officer
Electoral Office for Northern Ireland	Virginia McVea, Chief Electoral Officer for Northern Ireland

1 Welcome and introductions

1.1 The Chair, Anna Carragher, welcomed everyone to the meeting and in light of changes in party representation, round table introductions were made.

2 Notes of previous meeting on 3 October 2017

2.1 The Panel agreed the notes of the previous meeting.

Matters arising

2.2 A party representative said that he considered the Chief Electoral Officer's (CEO) comments recorded at para 7.7 of the notes of the previous meeting to be rather negative. This related to potential checks for those who applied for an absent vote in successive electoral events due to working away from home. The CEO responded that this had not been her intention, she had simply identified that she had a duty to reassure the public that all these people still met the criteria for being on the electoral register at the given address.

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2.3 There was a wider discussion on the differing legislative requirements in Northern Ireland and Great Britain for absent votes. One party representative said that it was unfair that the rules for applying for an absent vote in Northern Ireland were tougher than in Great Britain, including for the same electoral event. However when this had been reviewed by the Electoral Commission in 2002, there had been very little cross-party support for aligning the arrangements in Northern Ireland with those in Great Britain. Another party representative noted that the ease of access to absent votes in Great Britain was being challenged by some.

3 Issues raised by the political parties

3.1 No items had been raised by the parties in advance of the meeting.

4 Recent Commission publications

Review of first publication of donation and loans returns

4.1 Details of political donations and loans to Northern Ireland parties had recently been published for the first time, covering the period 1 July to 30 December 2017.

4.2 In future the Commission would publish quarterly information alongside that reported quarterly by parties in Great Britain, usually within a month of the submission deadline. The next publication would be in late May and feedback on the publication process would be welcomed.

4.3 Donations and loans reported by regulated donees would be published on the third Tuesday of each month.

4.4 The Chair advised that the Commission continued to lobby the Northern Ireland Office (NIO) for transparency to be back-dated to January 2014 as envisaged in the original primary legislation.

4.5 In response to a party query regarding foreign donations, Ann Watt said that the law relating to permissible donations in Northern Ireland was well-established.

Initial consultation on Codes of Practice on election spending

4.6 In early February the Commission had written to APP members advising that it was drafting two Codes on Practice on election spending: one for parties and one for candidates. Parties had initially been invited to comment by 26 February 2018. Views would continue to be welcomed ahead of a formal consultation process later in the year – parties should contact Denise Bottom at the Electoral Commission (dbottom@electoralcommission.org.uk).

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General Data Protection Regulations factsheet

4.5 Following a request for information at the last APP meeting, the Commission had produced a factsheet published on 9 April 2018. A hyperlink would be emailed to parties following the meeting. The guidance set out the responsibilities of the political parties and the role of the regulator, the Information Commissioner's Office. Party representatives discussed the practical implications of the Regulations, particularly in relation to local councillors.

5 Update from Chief Electoral Officer for Northern Ireland

West Tyrone Parliamentary by-election

5.1 The Chief Electoral Officer (CEO) reported that as of the meeting, there appeared to be six nominated candidates. Polling stations had been finalised and the count centre would remain Omagh Leisure Centre. She advised the Panel of the deadlines for absent voting, late registration and late evidence requests. She asked the parties to contact her with any issues or queries.

5.2 Absent votes for the by-election would be processed by a single team at EONI.

Online registration

5.3 As discussed at previous meetings, the introduction of online registration had been delayed because of uncertainty about whether there might be an imminent election. It was now anticipated this could be introduced in late June, following the local elections in GB.

5.4 The Electoral Office would be working with schools and young people ahead of this date. It was anticipated there would be a potential issue with duplicate registrations, if existing electors attempted to re-register online. The CEO had decided on balance that it would be less confusing for electors if the public message did not refer to individuals not applying if they were already on the register.

5.5 The CEO would contact parties to let them know whether a demonstration of the system would be possible.

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Schools project

5.6 The CEO highlighted that whilst the EONI were on standby for a possible Assembly election it had not been possible to visit all schools. As a priority a mailshot had gone to pupils at schools in the West Tyrone constituency and a further mailshot would subsequently be sent to pupils in other areas. The CEONI had been working closely with the Department of Education and NISRA to explore alternative digital formats for the schools programme once online registration was in place. This included using data and photos held by schools to invite online registration applications, as well as other ways to identify attainers.

The work with schools would be focussed on those attended by young people from disadvantaged backgrounds and/or from areas with low levels of participation, using free school meals data, registration and turnout data. One party representative warned against using free school meal data since in his view they included a bias.

5.7 She informed the Panel of a recent mock election and count with pupils at Hazelwood Integrated School. This had been very successful and had generated a list of pupils who had taken the test for counting staff, for possible future working at count centres.

6 Political finance – statutory return deadlines

6.1 Parties were reminded of the following deadlines:

To be submitted to the Commission by 30 April 2018:

- Quarter 1 2018 donation and loan returns
- Statement of accounts for parties with both income and expenditure of £250,000 or less
- Statement of accounts for Accounting Units with income or expenditure over £25,000 and up to £250,000

The Commission would also encourage parties to submit their annual confirmation of registered details (RP8) at the same time.

To be submitted by 7 July 2018

- Statement of accounts (audited with auditor's certificate) for parties with income or expenditure over £250,000

6.2 Party representatives were asked to download up-to-date reporting forms for the above reports from the Commission website. The donation and loan reporting forms had recently been updated following legislation changes.

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6.3 Roisin McDaid gave the Panel an overview of relevant deadlines for candidate spending and donation returns for the West Tyrone Parliamentary by-election. She asked parties with queries regarding spending to contact her direct. The regulated period begins the day after someone becomes a candidates (earliest date 16 January). Assuming the result is announced in the early hours of Friday 4 May, candidate returns will be due with the Returning Officer by 8 June.

7 Electoral Commission modernisation projects

Delivering modern guidance

7.1 Following her briefing to the October APP meeting, Carol Sweetenham updated the Panel on progress. The project was now considering the design of a blueprint for a new web-based modern guidance system. She talked the Panel through a potential way forward as illustrated on a handout. The aim was to produce a prototype in the next few months and she asked for a volunteer to join a user group of key interests which would help shape the new system. Sharon Lowry volunteered to join this forum.

7.2 It was anticipated that the first new-style guidance would be released in 2019 and thereafter in sequence with the electoral cycle.

Re-development of PEF Online

7.3 Carol also updated the Panel on the project to replace the existing PEF Online system. A supplier had recently been appointed and work would begin to build the new system on 23 April 2018. A key part of this construction would be the involvement of key users with the developer, to ensure the system does all that is needed and its processes are effective. Barbara Knox was nominated by a colleague for this role.

7.4 In order to gather wider party input, it was suggested that the system developer would hold individual meetings with party representatives in Belfast on a date to be confirmed. It was then anticipated that the test system could be demonstrated collectively to the APP, potentially at its October meeting, for further feedback.

8 2018 Meeting Dates – June and October

8.1 The Chair suggested the following replacement dates for the remaining 2018 meetings:

Monday 18 June and Tuesday 2 October (9.30am start)

These replace the previous dates of 19 June and 16 October.

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Party representatives were asked to speak to Caralyn Morton if there were any issues with these dates.

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List of agreed actions

Action	Responsible
CEO to contact parties if demo of online registration system is possible.	Electoral Office
Submit donation and loan returns for Quarter 1 by 30 April 2018 Submit annual statement and accounts by appropriate April/July deadline – see Point 6.1	Party representatives
Note revised June and October 2018 APP meeting dates. **Monday 18 June and Tuesday 2 October (9.30am start)**	Party representatives

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Northern Ireland Assembly Parties' Panel

Tuesday 10 April 2018 at 9.30am in the Zinc Room

Radisson Blu Hotel, the Gasworks, Belfast, BT7 2JB

Agenda

1 Welcome and introductions

2 Notes of previous meeting held on 3 October 2017

- Minutes of the last meeting
- Matters arising:

3 Issues raised by political parties in advance of the meeting

4 Recent Commission publications:

- Review of first publication of donation and loans returns
- Initial consultation on Codes of Practice on Election Spending
- General Data Protection Regulations – Factsheet

5 Update from Chief Electoral Officer for Northern Ireland

- West Tyrone Parliamentary by-election
- Online registration
- Absent votes
- Schools project

6 Political finance - statutory return deadlines

7 Electoral Commission modernisation projects

- Delivering modern guidance
- Re-development of PEF Online

8 AOB

9 2018 meeting dates – June and October

Northern Ireland Assembly Parties' Panel

Tuesday 3 October 2017 at 9.30am in the Zinc Room

Radisson Blu Hotel, the Gasworks, Belfast, BT7 2JB

Agenda

1 Welcome and introductions

2 Notes of previous meeting held on 19 June 2017

- Minutes of the last meeting
- Matters arising:
    - Review of deadline for co-option to the NI Assembly.
    - Commission policy on appointment of Deputy Nominating Officer

3 Issues raised by political parties in advance of the meeting

4 Commission reports on UK Parliamentary General Election

5 First publication of donation and loans returns

6 Electoral Commission modernisation projects
- Delivering modern guidance
- Re-development of PEF Online

7 Update from Chief Electoral Officer for Northern Ireland
- Online registration
- Absent votes

8 Political finance - statutory return deadlines

9 AOB

10 2018 meeting dates

Delivering Modern Guidance

NI APP

9 April 2018

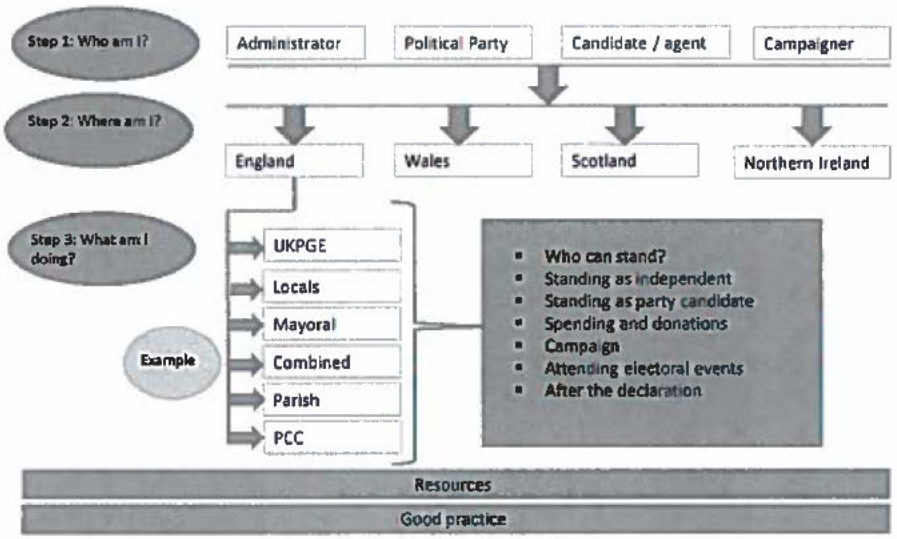
DMG: what we looked at

- Size and structure of the guidance
- Process and resilience
- User experience
- Best practice
- Technological options

Our conclusion: we should move to a web-based approach keeping the quality and comprehensiveness of the guidance but making it easier to navigate

Candidate and Agent Guidance

Proposed structure of new-style guidance



Delivering a new system

- Aim to prototype over the summer, with a view to starting rewrite in autumn
- Aim to release first new-style guidance in 2019 to allow time for iteration with users
- Thereafter sequence with electoral cycle
- Crucial to consult with users throughout: have set up a user group and will continue to consult with stakeholders

[redacted]

From: Ann Watt
Sent: 19 May 2017 15:37
To: Bob Posner; Ailsa Irvine; [redacted] Louise Edwards; Claire Bassett; [redacted]
Cc: [redacted]
Subject: Meeting with Sinn Fein, 19 May 2017

Categories: Transferred to SharePoint

At Sinn Fein's request, [redacted] and I met with a delegation from the party this morning (Paul Maskey MLA, Chris Hazzard MLA, Elisha McCallion MLA, Gary Fleming).

At the start of the meeting I made clear that Electoral Commission employees were by law not permitted to discuss any details of donations made to NI parties. We would therefore not be answering questions or making comments about any specific donation(s). We would however do what we could to help them understand the rules and the Commission's processes. We repeated that the Commission has long called for transparency in donations to NI parties.

Sinn Fein said that there was disquiet and concern about the £435k donation that the DUP said it had received from the Constitutional Research Council (CRC) to fund its EU referendum campaign spend. Sinn Fein said this was potentially undermining the democratic process. In particular, there was concern that CRC was not the original source of the donation, and that the original donor might not be permissible. There was speculation that this donation may have been made to deliberately subvert the rules on permissibility. They said that the Commission should be looking at the donation DUP said was from CRC, to assess whether CRC was the true source.

Sinn Fein also asked whether we had powers to examine donations retrospectively. They asked what international organisations we would contact when looking at donations.

We made the following points in response:

- We will not make any comment on any specific donation to a NI party. We will therefore not make any comment on any aspect of the donation that the DUP said it received from CRC. We made the point that DUP chose to reveal this donation, but nevertheless the Commission is still bound by the confidentiality rules;
- It is up to a party's Treasurer to do the necessary checks to make sure that all donations accepted are permissible, including doing checks to be sure about the true source of the donation;
- We take our regulatory role very seriously. The Commission does permissibility checks on all donations to NI parties;
- The Commission is not currently investigating donations to any NI party;
- We might investigate donations retrospectively if new information suggested we should do so;
- We did not think international organisations were relevant since a donation from outside UK/Ireland would not be permissible.

After this discussion, Sinn Fein raised some electoral administration issues:

- They were annoyed by press reports this week which were suggesting that the increase in proxy votes in March 2017 suggested fraud was taking place. Rather they felt the increase in proxy votes represented people being able to access their vote;
- Similarly they were annoyed by press reports about allegations of polling agents breaking the law in taking information out of polling stations. They said polling agents were fulfilling their function and had every right to be there;
- They raised issues about the capacity of EONI to process registration forms and absent votes (particularly given the removal of 60,000 entries from the register in December 2016). They claimed that EONI were turning down forms with trivial errors, and that they were not providing support for registration clinics due to lack of staff time;

- They said that Northern Ireland should have an absent vote regime much more similar to GB, so that it was easier for voters to get postal or proxy votes.

After the meeting, Sinn Fein briefed several media crews in the car park outside our office. They then issued this press statement .

Ann

Ann Watt
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Please consider the environment before printing this email.

[redacted]

From: Ann Watt
Sent: 19 May 2017 15:54
To: Ailsa Irvine; Bob Posner; [redacted]; [redacted] Louise Edwards; [redacted] Claire Bassett
Subject: Meeting with Arlene Foster, Thursday 18 May

Categories: Transferred to Skynet

Yesterday [redacted] and I met with Arlene Foster at her request.

She raised concerns about two electoral administration issues:

- Proxy votes – she noted the 50% increase in the number of proxy votes in March 2017, as set out in our election report published earlier in the week. We said that the checks required by the law were carried out on each application, and that we had not received any allegations of proxy vote fraud. In the context of increased turnout in March, the increase in proxy votes could just represent more electors having their say in the election. We said that she should provide evidence to the PSNI of any fraud.
- Polling agents – she said that polling agents in Fermanagh and South Tyrone were taking information out of polling stations about who had voted, in order to round up people to vote. She said this was happening particularly in rural polling stations. I said that again she needed to provide evidence of any alleged law breaking. I said that we would have a Commission representative in FST on polling day who would look at this issue particularly. I also said we would speak to CEONI about the instructions EONI give poll staff about polling agents, and Virginia has agreed to provide a note for staff on what polling agents can and cannot do. AF said that she would like to see polling agents abolished, which would require primary legislation. In this context she noted a possible future Elections Bill at Westminster. We said that in NI the Commission had considered this issue in some detail several years ago, but that there had been no consensus between the parties on it.

There was no mention of any donation, EU referendum or any other issue.

Ann

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The Electoral Commission

Northern Ireland Assembly Parties' Panel, 3 October 2017

Party Finance and Registration system project: replacing PEF Online

This paper updates the Assembly Parties' Panel on a new Electoral Commission project to replace the existing PEF Online system, and invites members to participate in the design of the new system. It covers:

- the case for the new system and how we envisage it being rolled out
- user-centred delivery and invitation to members of the APP to participate

i) The case for a new system

The Electoral Commission's PEF Online system provides a secure environment for the registration of political parties and campaigners and the submission of their statutory returns.

The current PEF Online system was ground-breaking when it was introduced nearly a decade ago. But expectations have now moved on. The system is built on elderly technology, with an estimated cost of £1m to bring it up to modern standards and even then a likely need for future spend. It was designed at a time when technology made it harder to factor in user needs interactively. It is complex and expensive to change. The result is that many parties do not use it because it is not compatible with their own systems, meaning time-consuming and tedious manual handling of information on both sides. For example, we are aware that only one Northern Ireland party uses PEF Online regularly.

Recent developments in technology such as the use of platforms and the widespread use of agile programming techniques mean that it is now much easier to design systems which put the needs of users at their heart and can be readily updated. This has clear advantages both for those using the system and for the Commission as the regulator.

Following a Gateway Review, the Electoral Commission has decided to commission a new system for online party registration and finance, working closely with users to ensure that the new system meets their and our needs. We plan to build a system that will meet user needs and therefore reduce (or eliminate completely) the need for returns in other formats (eg paper-based). The timescale and phasing of implementation will be discussed with users to ensure that they meet needs and do not affect the delivery of business as usual.

ii) User-centred delivery and invitation to participate

The Commission proposes to develop the new system using agile delivery, drawing on the methodology established by the Government Digital Service. This means that understanding, defining and capturing user needs are at the heart of the process. Users are asked to participate in the process from the start, and invited at regular intervals to comment on the extent to which the developing system is meeting their needs. To help us do this we will set up a User Group to represent the interests of users. We would welcome the participation of representatives from the Northern Ireland parties on this group.

Carol Sweetenham
Project Manager

Questions for discussion at APP

- What are the barriers preventing your current use of PEF Online?
- What would need to change to convince your party to use a new online system to submit statutory returns to the Electoral Commission, rather than paper-based returns?
- Would you be willing to participate in the User Group to help influence the development of the new system?

The Electoral Commission

Northern Ireland Assembly Parties' Panel, 3 October 2017

Delivering Modern Guidance Project: Update

1.1 The Electoral Commission's guidance is central to the delivery of elections, both for candidates and parties standing for election, and for those administering elections. It is widely respected both for its quality and its comprehensiveness. However it is not always easy to navigate and it does not make use of modern web-based technology. The Delivering Modern Guidance project has been set up to recommend a way forward which retains the quality and scope of the guidance but modernises its presentation.

1.2 This paper sets out:

- the work carried out to analyse the existing system of guidance
- the preferred way forward
- next steps

i) Analysing the existing system

2.0 The project looked at five aspects of how the Commission currently produces guidance:

a) Mapping the existing guidance

2.1 There are over 7,500 pages of Electoral Commission guidance presented largely as PDFs. Because this is organised by type of election there is significant repetition and overlap, and some material could be archived. The search function is poor and it is not always obvious where to look for information. The underpinning structure is clear and the quality of the guidance universally respected. But the volume, written style, inability to move round quickly and poor search function impede navigation.

b) Business process and working with stakeholders

2.2 There are increasing questions about resilience faced with such a large quantity of material, and over time this will pose an increasing risk both to users and to the Commission. Without radical change to the approach it will be hard to mitigate this risk.

c) User testing and user journeys

2.3 User testing was carried out with target audiences for the guidance covering a range of experience and knowledge. The aim was to understand how users approached the guidance for answers. The findings were strikingly uniform: even the most experienced users of the guidance sometimes struggled to find answers. What the guidance said was universally respected. The issue is with how it is presented. Delivery is not matched closely enough to audience need, and that means neither the Commission nor users are getting what they need.

d) Good practice elsewhere

2.4 The Electoral Commission needs to mirror modern good practice. Other regulators, and electoral bodies in other countries, have already adopted a web-based approach, and there is ample good practice both as to what this looks like and how to manage the transition.

e) Technological options

2.5 There is now a plethora of content management systems: it is entirely possible to have a system which is web-based but allows printing and downloading. Whatever system we adopt will need to be future-proofed for greater use with tablets and mobiles, and other future technologies.

ii) <u>The way forward</u>

3.1 The conclusion of the analysis so far is that the Commission could not maintain the status quo and continue to meet the needs of stakeholders or its own needs.

3.2 It would be possible to make modest gains by improvements to the existing system: for example better indexing of PDFs, reviewing drafting and reorganising

some sections. But it was not clear this would deliver the level of change required. The preferred option would be to move to a web-based approach. This would have significant advantages in terms of navigability, resilience and clarity. It would be crucial to ensure feasibility: the quality and comprehensiveness of the guidance must be maintained. So it is likely that different degrees of this approach will be needed in different parts of the guidance.

Next steps

4.1 The next steps are to test and develop this approach further, and to discuss it in more detail with stakeholders.

4.2 A provisional timetable might be:

- October 2017: develop proposals in more detail
- October-November 2017: in-depth discussion with stakeholders
- December 2017: decision on way forward
- January-March 2018: detailed design work in collaboration with stakeholders, covering both future proposals and implementation
- April 2018 onwards: phased implementation on a basis to be agreed.

Carol Sweetenham
Head of Delivering Modern Guidance Project

Questions for discussion at APP

1. As users of the Electoral Commission's guidance, do you agree with the conclusions of the project so far?
2. From your perspective, what are the priorities for a new system of Electoral Commission guidance?
3. Are there particular areas of the guidance which you think we need to review?