From:	FOI
To:	[redacted]
Subject:	FOI 073-22 - Response
Date:	04 October 2022 13:01:18
Attachments:	Tower Hamlets Integrity meeting 20120306.pdf Note of Gold Command Group Meeting 040913_Redacted.pdf Note of Meeting with Tower Hamlets 150713_Redacted.pdf Notes of integrity meeting at LB Tower Hamlets_Redacted.pdf

Dear [redacted],

Our Ref: FOI-073-22

Thank you for your email to the Electoral Commission dated 1 September 2022.

The Commission aims to respond to requests for information promptly and regrets that it has not done so within the statutory timeframe of twenty working days.

Your request is shown below followed by our response.

The Commission had numerous meetings with election staff of the London Borough of Tower Hamlets leading up to the disastrous 2014 Mayoral Election in that borough, apparently to discuss the security of the ballot.

1. On what dates did these meetings take place?

2. Who attended the meetings?

3. Please make available the minutes of these meetings and all other papers connected with them.

Our response is as follows:

We hold some information that is relevant to your request. Our records show that Electoral Commission staff attended meetings with election staff of the London Borough of Tower Hamlets on the following dates ahead of the May 2014 elections:

- 6 March 2012, attended by one member of Commission staff
- 15 July 2013, attended by the Electoral Commission's Head of Policy and one other member of Commission staff
- 4 September 2013, attended by the Electoral Commission's Director of Electoral Administration and one other member of Commission staff

We have also identified that we hold information relating to these meetings. These include notes prepared by Commission staff for internal purposes, which are not formal minutes of the meetings. Please see the attached documents.

You will notice that some details have been redacted from the documents we are releasing. Section 40(2) of the Freedom of Information Act 2000 (FOIA) provides for an exemption where the information requested constitutes personal data as

defined by the Data Protection Act 2018 (DPA), and where release of the information requested would breach one of the data protection principles.

Some of the information contained in the requested information falls within the description of personal data as defined by the DPA because the information relates directly to an identifiable living individual. Under this provision, we have also redacted the names and job titles of Commission staff that are not, or have not been part of, our Senior Leadership Team (Head of Service level). This is because those members of staff have a reasonable expectation that their personal details will not be made public.

I trust that this information satisfies your request. 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: https://www.electoralcommission.org.uk/freedom-information/make-a-freedom-information-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

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The Electoral Commission
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Electoral Services

Annual Canvass

Tower Hamlets employs over 130 canvassers to make personal visits for stage one and stage two (10 weeks) of the annual canvass. Most other authorities only need to make one personal visit. Our annual canvass return for 2011 was 86.36%. Each non responding property had at least 3 canvass forms and we conduct a further special canvass for all low responding areas.

All canvassers are assigned a supervisor who is responsible for quality checking their work to ensure the forms are being completed correctly. When the forms are delivered to the office, a further check with our internal databases is carried out to ensure the information provided is correct and up-to-date.

At March 2012, Tower Hamlets has 113,659 properties and 173,178 electors. During the canvass period (August to November), over 46% of our properties had changes to the information provided on the canvass form. We have problems with our private gated blocks because the concierge refuses us entry into the buildings. The canvass forms are sent out via Royal Mail and during the 2011 canvass, only 64% were returned.

Each year we prosecute residents who fail to provide information during the annual canvass period.

We have 1,370 company lets where residents are there short term, whilst on business in this country.

Over 5,000 properties are listed as foreign nationals, who are not eligible to register.

We currently have 5,373 void properties, these are periodically checked against our internal databases.

Rolling Registration

The revised Register of Electors 2012 was published on 1 December 2011. Since then there have been 9,860 alterations to the register, representing a 5.69% change.

We receive on average 1500 forms per month with additions, deletions and alterations made to the register.

During the rolling registration period a check list is available to record if more than 5 residents are already listed. All previous residents are then checked against our council tax system to see if they have moved on. If the monthly status shows more than eight residents, we conduct a personal visit to confirm the current status.

A form requesting further information about previous residents is sent out with all new registration forms. The form asks if the new people have moved in with residents already registered or if they are new residents and all previous residents have moved out. This information keeps the register up-to-date and accurate.

The web household registration form contains a tick box asking the residents to confirm if they are new residents and none of the previous residents live at the property.

We attend Citizenship ceremonies twice a week to register new British citizens.

Elections

Before the start of the statutory timetable before an election, we conduct a personal check of all properties with more than eight residents. Canvassers are employed to visit each property to confirm if all the residents still reside there. A signature is obtained from each property to confirm the current status. A total of 57 properties, with 516 electors were visited during the weekend of 25/26 February 2012, results as follows:

113 = Electors deleted (21.89%)
22 = No change to property details
6 = Electors added (registration forms completed on the doorstep)
5 = No response from property – further visit required
4 = Name changes
2 = Registration forms left at property to complete

Due to the registration allegations made recently, we are conducting further visits this weekend on properties with 6 or more residents. The results of the canvass will be shared.

When the statutory monthly revision date has passed and up to the 11 day provision for registration in the election timetable, all new application forms received are placed in a separate box. All new additions are checked against other council records for validity. If there are discrepancies, the residents are written to asking for proof of residency.

During the timetable period, the team are tasked to observe handwriting patterns on all registration forms received. If there are irregularities, the forms are passed on the manager for investigation.

Polling Stations

All polling station staff receive specific training regarding the procedures to follow if they or a polling agent suspects personation. All staff will be required to look at shoes, rings and clothing for electors wearing hajibs.

Absent Votes

During our postal vote opening sessions, we conduct a 100% check of all personal identifiers, signature and date of birth, against the original postal vote application received. A consistent verification approach is adopted by the two appointed deputies.

Any irregularities found are recorded and checked again in the office. A quality check is performed for elderly residents asking them to complete a fresh application form.

Performance Standards

Tower Hamlets ERO meets 4 and is above 6 of the 10 performance standards set by the Electoral Commission. The Commission have visited our offices in previous years and are happy with the self assessment submitted.

The Electoral Commission

Note of Gold Command Group Meeting at Bethnal Green Police Station

4 September 2013

Present:

[redacted], Borough Commander, MPS ([redacted])
[redacted], MPS ([redacted])
[redacted], MPS ([redacted])
[redacted], Tower Hamlets ERO/RO ([redacted])
[redacted], Tower Hamlets ESM ([redacted])
[redacted], Tower Hamlets ([redacted])
Andrew Scallan, Electoral Commission (AS)
[redacted] Electoral Commission ([redacted])

Outstanding actions

[redacted] confirmed [redacted] is now again in contact with Councillor [redacted], who [redacted] is due to meet with in October/November. [redacted] will be meeting with all parties individually rather than holding a mass meeting.

AS requested that we check with Comms team as to what Councillor [redacted] has said to the Commission in [redacted] most recent correspondence with us.

Code of Conduct

The local protocol was discussed and AS raised the question as to who would own the protocol on the back of comments by [redacted]. MPS/TH agreed that the protocol would still be owned by TH with the Police being a signatory. [redacted] agreed that there was benefit and a need for the protocol to be signed both locally at [redacted] level and also centrally by the MPS.

[redacted] suggested that the protocol be signed up to in December. It is due to be put before the TH Overview & Scrutiny Committee (just for information), in October.

[redacted] also requested that the Commission contribute a paragraph to the protocol pledging support. AS felt that adding another paragraph to the protocol was unnecessary but that a couple of sentences endorsing the approach may be more appropriate. [redacted] suggested that the approach in TH could be disseminated by the Commission as good practice – AS explained that there would have to be a period of assessment and review of the approach before we could advocate it for other areas.

[redacted] mentioned the SPOC conference in January and said that if the TH protocol was successful, we could share that learning at this event.

EC Action: To review the TH local protocol and send our responses to [redacted] by 13/09/13, including a short endorsement statement.

Timeline

[redacted] stated that the timeline had been completed but that an earlier, incomplete version appeared to have been circulated with the papers, in error. [redacted] agreed to ensure that the updated version will be circulated with the minutes of today's meeting.

AS queried whether all actions appeared to be on the timeline and raised concerns that it was important that milestones were reached or there was a risk they would be concertinaed together making it more difficult for them to be met.

****AS requests that we review and insert actions into the TH timeline as there is a risk that not all actions have been captured and we may need to lead rather than anticipate that TH will think of all the necessary actions.***

[redacted] confirmed that on a local basis, the MPS will attend the meetings with agents.

AOB

AS mentioned our guidance document that we had prepared for the parties – TH indicated interest in including this in nomination packs.

[redacted] gave a quick update as to the ACPO work.

[redacted] mentioned that [redacted] has now left TH.

Date of next meeting

October 2013 – exact date TBC

[redacted]

5 September 2013

Note of Meeting with Tower Hamlets (LBTH)

15 July 2013

Present:

[redacted], Tower Hamlets ERO/RO ([redacted])
[redacted], Tower Hamlets ESM ([redacted])
Tom Hawthorn, Electoral Commission (TH)
[redacted] Electoral Commission ([redacted])

TH queried the progress against the plan that TH had recently submitted to the Commission and what actions were being undertaken.

[redacted] stated that the local protocol was on-going work. [redacted] was anticipating this would be ready for a draft to be placed before LBTH GP Committee at its September meeting of the General Purposes (GP) Committee at the same time that the department would be reporting back on the polling districts review.

[redacted] said that information as to the processes and procedures put into place as a result of the report would be provided to all parties.

[redacted] Queried as to whether, as part of the LBTH strategy to tighten up on the accuracy of the electoral register if the refresh could be carried out earlier. TH suggested that if the refresh was brought forward he was uncertain as to the legal implications as to whether voters could be removed from the register. [redacted] to check the legal position.

[redacted] agreed that a draft of the local protocol would be made available to the Commission by mid-august to enable us to comment, prior to submission to the LBTH GP Committee meeting in September.

[redacted]
18 July 2013

Notes of integrity meeting at LB Tower Hamlets

Tuesday 6 March 2012

Present: [redacted] (Head of Democratic Services), [redacted] (Electoral Services Manager), [redacted] (Democratic Services Officer), [redacted] (London Elects), [redacted] (Electoral Commission)

[redacted] presented a summary document outlining procedures and processes in respect of dealing with canvass registration forms, rolling registration application forms, postal voting application forms, and the process followed between the close of the statutory monthly alterations and the 11 day registration deadline during an election period. The document also referred to the particular problems encountered with canvassing private gated properties. (Document attached).

The document gives good overarching summary detail of the steps taken to ensure a complete and accurate register, and at the meeting we went through the document, asking questions and expanding upon detail where necessary. Additional points arising from discussions and not covered in the document are highlighted below:

- Comparison had been carried out with Lewisham and Newham on alterations to the published register since December 2011. Those authorities reported between 1.2% and 1.4% level of alterations, compared to Tower Hamlets 5.69%.
- We spoke about the personal canvass carried out over the weekend of 25/26 February of some 57 properties with over 8 electors. TH intended to carry out a further exercise on all properties with over 6 electors registered over the weekend of 10/11 March and had identified a further 600 properties. Results will be shared with us.
- They will be carrying out a data matching exercise against Council Tax records after the election. TH believe this will demonstrate further the high mobility rate in the Borough.
- TH would normally send out confirmation of registration letters in February as a mini-audit exercise, This has not been carried out this year due to budget constraints.
- The local SPOC is very engaged and supportive according to TH. They pass on any concerns to him, although they did comment that it was usually the case that action or investigation would only take place after an election rather than before polling day. They confirmed that no allegations had been reported to police in respect of the recent newspaper coverage.
- TH were in close contact with Newham in respect of the GLA and Mayoral elections (Newham are constituency lead for City and East). TH will attend the agents meeting to try and allay any fears caused by press coverage.

- They reported a good working relationship with the local agents and political parties.
- We spoke about instances of alleged intimidation at polling stations. TH are well aware of the issue and have identified particular polling stations to police who will cover with roving patrols. TH also have their own Enforcement Officers and 18 will be allocated to potentially difficult polling stations in addition to polling staff. Visiting Officers are also employed and allocated to a group of polling stations, and they will visit each throughout polling day and report back any problems.
- I gave feedback to TH on steps taken by other London Boroughs in relation to Integrity issues (email attached summarising what they had reported to us through Performance Standards). There was nothing reported that had not already been considered or was otherwise covered or in place.

In summary it is clear to me that Tower Hamlets have all of the processes and procedures in place to merit being above standard in respect of ERO integrity requirements.

While not relevant to allegations of too many people being registered, there are actions that TH should consider to tighten up procedures. These include ensuring that the procedures followed for removing electors comply with the requirements of the review process. TH could also consider how they could further utilise the framework of the review process to both remove entries and also require further information and evidence from electors attempting to register.

TH might also consider whether it was worthwhile to publicise more widely the ability for registered electors in the borough to object to register entries. This would enable allegations of false registrations to be properly focussed through the mechanisms available to challenge entries.

I would like to write to the ERO of Tower Hamlets confirming that we are happy to verify that they exceed the requirements of our performance standard in respect of integrity. I believe that TH have processes and procedures in place to do all they can within the current framework and given available resources to both prevent and detect potential fraudulent registrations.