

## Caitlin Lindenberg

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**From:** FOI  
**Sent:** 07 June 2016 13:43  
**To:** [REDACTED]  
**Subject:** FOI 48/16 - EU Referendum Fraud  
**Attachments:** Higher risk area profiles May 2016.pdf

Dear [REDACTED]

### **Our Ref: FOI 48/16**

Thank you for your request under the Freedom of Information Act 2000 dated **10<sup>th</sup> May 2016**.

The Commission aims to respond to requests for information promptly and has done so within the statutory timeframe of twenty working days.

Your request is in bold below followed by our response.

You have requested:

**\* Please provide copies of all reviews/assessments made in relation to the risk of fraud in the 2016 EU Referendum.**

**\* Please provide copies of all policy documents in relation to preventing fraud in the 2016 EU Referendum.**

**If no such policy documents exist, please disclose the measures taken and to be taken by the commission to prevent fraud in the referendum.**

Our response is as follows:

We have identified that we hold some information which is relevant to your request.

Electoral Registration Officers and Returning Officers are responsible for planning and managing the delivery of electoral fraud prevention plans, working closely with police forces to assess and monitor electoral fraud risks in the areas for which they are responsible. We provide guidance and set performance standards which aim to ensure that EROs and ROs have thoroughly analysed the risk of electoral fraud locally and that their plans represent an effective response to tackle those risks.

We focus our support and monitoring work in areas where there has been a history of allegations of electoral fraud and where the risk of further allegations arising is higher. These areas currently include: Birmingham; Blackburn with Darwen; Bradford; Bristol; Burnley; Calderdale; Coventry; Derby; Hyndburn; Kirklees; Luton; Oldham; Pendle; Peterborough; Slough; Tower Hamlets; Walsall; Woking.

Police forces, EROs and ROs in these areas have significant experience of preventing and detecting electoral fraud, and they work harder to minimise the risk of allegations arising.

We scrutinise their plans and help to identify where they might be able to improve their approaches, including working with peers to implement new procedures and safeguards. We will

also continue to share learning and experience from these areas with other ROs and EROs to help them plan to minimise the risk of electoral fraud.

This focussed work with those in areas at a higher risk of further allegations arising is in addition to the risk-based performance monitoring that we undertake in relation to our performance standards for ROs and EROs, which focusses on ensuring that electoral registration and administration services are well run across the UK.

As part of this work, we monitor key information and data about elections and the local political context which are relevant to these areas, ahead of and during election time. We carried out this monitoring ahead of the May 2016 polls, and will continue to monitor the risk of fraud in the lead-up to the June referendum on the UK's membership of the EU.

I have enclosed a copy of the monitoring information which was updated immediately before the May 2016 polls.

We have also published a number of policy and guidance documents which set out the measures which should be taken to prevent and detect electoral fraud at the referendum on the UK's membership of the European Union. These are available on our website at the following links:

- [Guidance for Counting Officers \(Part B: Planning and organisation\)](#)
- [Authorised Professional Practice on policing elections and referendums, published by the College of Policing on their website](#)
- [Guidance on preventing and detecting electoral fraud for the police in Scotland](#)
- [Guidance on preventing and detecting electoral fraud for the police in Northern Ireland](#)
- [A pocket guide on preventing and detecting electoral fraud for police officers in England and Wales](#)
- [A Welsh language pocket guide on preventing and detecting electoral fraud for police officers in England and Wales](#)
- [Code of Conduct for campaigners](#)
- [Postal voting – A quick guide for campaigners](#)
- [Postal voting – A quick guide for Royal Mail drivers and delivery staff](#)
- [Protocol for sharing information about allegations of electoral fraud at the EU referendum](#)

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: <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: <http://www.ico.gov.uk>

Yours sincerely

**Paul O'Malley**  
**Information Adviser (Records Management)**

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[www.electoralcommission.org.uk](http://www.electoralcommission.org.uk)

[www.aboutmyvote.co.uk](http://www.aboutmyvote.co.uk)

Putting voters first



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# High Risk Profiles

## Region: North of England

### Blackburn

Political control: Labour

Labour party: 47

Conservative party: 14

Liberal Democrats: 3

Electoral cycle: 64 seats (33 for a majority)

Election by thirds

**Statement of persons nominated borough council election (Audley):**

<https://www.blackburn.gov.uk/Lists/DownloadableDocuments/Local-Candidates-2016.pdf>

**Statement of persons nominated PCC:** <https://www.blackburn.gov.uk/Lists/DownloadableDocuments/PCC-Candidates-2016.pdf>

Ward (1 seat each unless stated)	Currently /winner at last election	Background and electoral data
Audley	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 16%</b> (national average = 3.8%, local average = 10%)
Bastwell	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 14%</b> (national average = 3.8%, local average = 10%)
Beardwood With Lammack	<b>Conservative (hold)</b>	<b>Postal vote rejection rate = 7%</b> (national average = 3.8%, local average = 10%)
Corporation Park	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 17%</b> (national average = 3.8%, local average = 10%)
Little Harwood	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 10%</b> (national average = 3.8%, local average = 10%)
Shear Brow	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 14%</b> (national average = 3.8%, local average = 10%)

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/ mitigation to date	Plans for further EC action /escalation
Allegations of fraud	3 cases reported in 2015 but all resolved as no further action.				
Media and other local issues					
ERO/RO and police relationships and plans	<p>Strong relationship between the Lancashire SPOC and the authority, with regular county-wide meetings.</p> <p>Responsibility for integrity work sits at a senior level within the authority, and Blackburn work to lead and coordinate integrity approaches across the county.</p>				
List of further work needed to comprehensively assess risk & build assurance	<p>Plans for PCC and local elections are county-wide and are adapted from longstanding plans tested at all types of election and reviewed in previous years. No concerns during issue of postal votes (w/c 25 April) and no other specific issues raised.</p>				

# Bradford

Political control: **Labour Control**

Total seats + 90 (46 for a majority)

Political make up:

Labour: 46

Conservative: 23

Liberal Democrat: 9

Bradford Independent Group: 4

Green Party: 3

The Independents: 2

Independent: 1

Queensbury Ward Independents: 1

UK Independents Party: 1

Electoral cycle: **Elections by thirds – 30 seats**

Most recent local authority elections: 2014

Most recent comparable elections in wards: 2010

**Statement of persons nominated parish council elections:**

[http://www.bradford.gov.uk/bmdc/government\\_politics\\_and\\_public\\_administration/democracy\\_and\\_elections/statement\\_of\\_persons\\_nominated\\_election\\_of\\_parish\\_councillors](http://www.bradford.gov.uk/bmdc/government_politics_and_public_administration/democracy_and_elections/statement_of_persons_nominated_election_of_parish_councillors)

**Statement of persons nominated district council election:**

[http://www.bradford.gov.uk/bmdc/government\\_politics\\_and\\_public\\_administration/democracy\\_and\\_elections/statement\\_of\\_persons\\_nominated\\_local\\_elections](http://www.bradford.gov.uk/bmdc/government_politics_and_public_administration/democracy_and_elections/statement_of_persons_nominated_local_elections)

**Statement of persons nominated PCC:** <https://policinginsight.com/wp-content/uploads/2016/04/West-Yorkshire-PARO-SOPN.pdf>

Ward (1 seat each unless stated)	Currently /winner at last election	Background and electoral data
Bowling & Barkerend	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 7%</b> (national average = 3.8%, local average = 5%)
Bradford Moor	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 10%</b> (national average = 3.8%, local average = 5%)
City	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 8%</b> (national average = 3.8%, local average = 5%)

Keighley Central	<b>Conservative (gain from Labour)</b>	<b>Postal vote rejection rate = 7%</b> (national average = 3.8%, local average = 5%)
Little Horton	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 8%</b> (national average = 3.8%, local average = 5%)
Manningham	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 11%</b> (national average = 3.8%, local average = 5%)
Toller	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 8%</b> (national average = 3.8%, local average = 5%)

### Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/mitigation to date	Plans for further EC action /escalation
Allegations of fraud	<p>31 cases recorded in 2015, 7 of which are unresolved – 4 are awaiting prosecution advice and 3 are still under investigation. Remaining 24 resulted in no further action.</p> <p>Of the unresolved cases, 5 relate to a s. 106 (1) False statements as to candidates, 1 to s.66 Requirement of secrecy (Bradford West) and 1 s. 75 – 85 Return of expenses (Bradford Keighley).</p>				

Media and other local issues					
ERO/RO and police relationships and plans	New WYP SPOC from November 2015. New SPOC will be from Bradford. Close working relationships between Bradford and West Yorkshire police.				
List of further work needed to comprehensively assess risk & build assurance	Plans for PCC and local elections are adapted from longstanding plans tested at all types of election and reviewed in previous years. No concerns during issue of postal votes (w/c 25 April) and no other specific issues raised.				



# Burnley

Political control: Labour  
 Labour party: 29  
 Liberal Democrats: 10  
 Conservative: 5  
 UKIP: 1  
 Electoral cycle:

## Statement of persons nominated PCC:

<http://www.burnley.gov.uk/sites/default/files/PCC%20Statement%20as%20Persons%20Nominated.pdf>

## Borough election statement of persons nominated:

<http://www.burnley.gov.uk/sites/default/files/Burnley%20Council%20Statement%20as%20to%20Persons%20Nominated.pdf>

Ward (1 seat each unless stated)	Currently / Winner at last election	Background and electoral data
Daneshouse With Stoneyholme	Labour (hold, uncontested)	Uncontested in 2015 but with historically high probability of electoral fraud allegations
Queensgate	Labour (gain from Lib Dem)	Postal vote rejection rate = 5% (national average = 3.8%, local average = 4%)

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/mitigation to date	Plans for further EC action /escalation
Allegations of fraud	No cases reported in 2015.				
Media and other local issues					

ERO/RO and police relationships and plans	Burnley are part of the Lancashire partnership of authorities, working together to address integrity issues (lead by Blackburn)		Leaflets in postal vote packs – as in Pendle, Community work .		
List of further work needed to comprehensively assess risk & build assurance	Plans for PCC and local elections are county-wide and are adapted from longstanding plans tested at all types of election and reviewed in previous years. No concerns during issue of postal votes (w/c 25 April) and no other specific issues raised.				

# Calderdale

Political control: No overall majority

Labour Party: 24

Conservative party: 21

Liberal Democrats: 5

Independent: 1

Electoral cycle: elections in thirds, 3 seat wards.

**Statement of persons nominated:** <http://www.wakefield.gov.uk/Documents/elections/2016/2016-pcc-statements-persons-nominated.pdf>

**Statements of persons nominated (individual links) local election:** <http://www.calderdale.gov.uk/council/democracy/election-information/notices/local-election/persons-nominated/index.html>

Ward (3 seat each unless stated)	Current / winner at last election	Background and electoral data
Elland	<b>Conservative</b>	<b>Postal vote rejection rate = 6%</b> (national average = 3.8%, local average = 5%)
Park	<b>Labour</b>	<b>Postal vote rejection rate = 7%</b> (national average = 3.8%, vs local average = 5%)

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/mitigation to date	Plans for further EC action /escalation
Allegations of fraud	8 cases reported in 2015 but all resolved as no further action (4 of which recorded as 'Other' and not RPA offences).				

Media and other local issues					
ERO/RO and police relationships and plans					
List of further work needed to comprehensively assess risk & build assurance	<p>Plans for PCC and local elections are adapted from longstanding plans tested at all types of election and reviewed in previous years.</p> <p>No concerns during issue of postal votes (w/c 25 April). Highlighted candidate who has previously been convicted of electoral fraud in 2007 standing in one ward, but no specific issues raised to date..</p>				

# Hyndburn council

Political control: **Labour control**

Total seats 35 (18 for a majority)

Labour Party: 23 seats

Conservative Party: 8 seats

Independents in Hyndburn: 2 seats

UK Independence Party: 2 seats

**Statements of persons nominated local elections:** [http://www.hyndburnbc.gov.uk/site/scripts/download\\_info.php?fileID=4947](http://www.hyndburnbc.gov.uk/site/scripts/download_info.php?fileID=4947)

**Statement of persons nominated PCC:** [http://www.hyndburnbc.gov.uk/site/scripts/download\\_info.php?fileID=4945](http://www.hyndburnbc.gov.uk/site/scripts/download_info.php?fileID=4945)

Electoral cycle:

Ward (1 seat each unless stated)	Currently /winner at last election	Background and electoral data
Barnfield	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 7%</b> (national average = 3.8%, local average = 5%)
Rishton	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 5%</b> (national average = 3.8%, local average = 5%)

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/mitigation to date	Plans for further EC action /escalation
Allegations of fraud	No cases reported in 2015.  Postal / Proxy voting issue – historic  Deputy Council leader – false registration allegations – historic				

Media and other local issues	Clear statements in Press regarding process for concerns etc.				
ERO/RO and police relationships and plans	Good relationship with SPOC – part of Lancashire partnership – good connection between PARO RO.  New ESM.		RO is Legal services so v. aware of integrity issues.		
List of further work needed to comprehensively assess risk & build assurance	Plans for PCC and local elections are county-wide and are adapted from longstanding plans tested at all types of election and reviewed in previous years. No concerns during issue of postal votes (w/c 25 April) and no other specific issues raised. Authority receiving support from wider Lancashire partnership.				

## Kirklees council

Political control: No overall control

Labour (including Labour + Cooperative): 34

Conservative: 18

Liberal Democrats: 10

Greens: 4

Valley Independent: 3

TOTAL: 69 seats

Electoral cycle: **Elections by thirds – 23 seats / year**

Most recent local authority elections: 2015

**Statement of persons nominated PCC:** <http://www.wakefield.gov.uk/about-the-council/elections/current-elections/pcc>

**Statement of persons nominated local elections:** <https://www.kirklees.gov.uk/beta/council-and-democracy.aspx#>

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/ mitigation to date	Plans for further EC action /escalation
Allegations of fraud	<p>3 cases reported in 2015 and all resolved with no further action or locally.</p> <p>1 case reported relating to 2016 has been reported for Kirklees (false information on registration form) and is still under investigation.</p> <p>Allegations around prominent local candidates common.</p>				
Media and other local issues					



<p>ERO/RO and police relationships and plans</p>	<p>Pro-active, strong relationships with Police. CE is v. aware of integrity issues.</p> <p>Rob Vincent – new commissioner previously at Kirklees – lots of background.</p> <p>2015 RAG rating for polling stations linked to policing presence</p>				
<p>List of further work needed to comprehensively assess risk &amp; build assurance</p>	<p>Plans for PCC and local elections are adapted from longstanding plans tested at all types of election and reviewed in previous years. No concerns during issue of postal votes (w/c 25 April) and no other specific issues raised.</p>				

# Pendle Council

Political control: No overall control  
 Conservative Party: 19  
 Labour Party: 18  
 Liberal Democrats: 11  
 British National Party: 1  
 Electoral cycle: 49 seats (25 for a majority)

**Statement of persons nominated PCC:** [http://www.pendle.gov.uk/downloads/file/8834/statement\\_of\\_persons\\_nominated\\_-\\_5\\_may\\_2016](http://www.pendle.gov.uk/downloads/file/8834/statement_of_persons_nominated_-_5_may_2016)

**Statement of persons nominated Borough election:**  
[http://www.pendle.gov.uk/downloads/download/2918/notices\\_and\\_statements\\_-\\_borough\\_elections](http://www.pendle.gov.uk/downloads/download/2918/notices_and_statements_-_borough_elections)

Ward (1 seat each unless stated)	Currently / Winner at last election	Background and electoral data
Bradley	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 9%</b> (national average = 3.8%, local average = 6%)
Brierfield	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 8%</b> (national average = 3.8%, local average = 6%)
Reedley	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 7%</b> (national average = 3.8%, local average = 6%)

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/mitigation to date	Plans for further EC action /escalation
Allegations of fraud	4 cases reported in 2015 and all resulted in no further action.				

Media and other local issues	<p>Allegations often feature in press.</p> <p>R4 report on electoral integrity 2015</p> <p>Parties have been reluctant to sign up to local protocol in past</p> <p><a href="http://m.lancashiretelegraph.co.uk/news/14428939.Council_leader_calls_for_police_presence_at_polling_stations_amid_threats_of_knee_cappings/">http://m.lancashiretelegraph.co.uk/news/14428939.Council_leader_calls_for_police_presence_at_polling_stations_amid_threats_of_knee_cappings/</a></p> <p>Allegations of threatened 'knee capping' raised by candidate in local press. RO aware and happy to deal with this locally.</p>				
ERO/RO and police relationships and plans	Part of Lancashire partnership.		Leaflets in postal vote packs on keeping vote safe.		
List of further work needed to comprehensively assess risk & build assurance	Plans for PCC and local elections are county-wide and are adapted from longstanding plans tested at all types of election and reviewed in previous years. No concerns during issue of postal votes (w/c 25 April) and no other specific issues raised, other than those listed above.				

# Oldham

Political control: Labour

Labour party: 45

Liberal Democrats: 10

Conservative: 2

UK Independence Party: 2

Independent: 1

Electoral cycle: 21 seats (11 for a majority)

**Statement of persons nominated Borough elections:**

[http://www.oldham.gov.uk/downloads/file/4100/statement\\_of\\_persons\\_nominated](http://www.oldham.gov.uk/downloads/file/4100/statement_of_persons_nominated)

NO PCC elections for Greater Manchester 2016

Ward (1 seat each unless stated)	Currently /winner at last election	Background and electoral data
Alexandra	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 8%</b> (national average = 3.8%, local average = 5%)
Coldhurst	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 8%</b> (national average = 3.8%, local average = 5%)
St. Marys	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 6%</b> (national average = 3.8%, local average = 5%)
Werneth	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 8%</b> (national average = 3.8%, local average = 5%)

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/ mitigation to date	Plans for further EC action /escalation
Allegations of fraud	No cases reported in 2015				

<p>Media and other local issues</p>	<p>UKIP chairman in Oldham was agent for Phil Woolas in 2010 election which resulted in petition for 106 False Statement. Also, produced “Guide to committing election fraud” leaflet in 2015: <a href="http://www.oldham-chronicle.co.uk/news-features/8/news-headlines/86029/ukip-accused-of-gutter-politics-on-election-eve">http://www.oldham-chronicle.co.uk/news-features/8/news-headlines/86029/ukip-accused-of-gutter-politics-on-election-eve</a></p> <p>UKIP have produced leaflet designed to look like Labour material: <a href="http://www.sunnation.co.uk/fight-for-oldham-west-seat-gets-dirty-with-fake-election-leaflet/">http://www.sunnation.co.uk/fight-for-oldham-west-seat-gets-dirty-with-fake-election-leaflet/</a></p>	<p><b>R</b></p>	<p>Early intervention press strategy worked well in 2015. Advice on keeping vote safe.</p> <p>05/11/15 - Oldham are putting press releases out on a theme of keeping your vote safe and are also bringing in a member of staff on secondment to focus on postal voting integrity during the postal voting period . They are also giving to the police so they are aware of when postal votes are arriving so that the police can work to identify any issues and respond to complaints about postal voter intimidation.</p> <p>Plan to send out letter to postal voters – ‘keep your vote safe’.</p> <p>Clarity as to which Reg to use from ERO vital – 05/11/05: advice clarified on 03/11/15 and supplemented yesterday with practical guidance.</p>	<p>EC could publicise code of conduct / or support RO in emphasising responsibility to follow code of conduct. Conversation between AS and RO.</p> <p>05/11/2015 – Veronica to contact Carolyn Wilkins’ office and arrange telephone conversation with AS. Will be welcomed by Oldham.</p> <p>Potential for EC to contact national parties contesting election.</p>	
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ERO/RO and police relationships and plans	GMP relationship with RO is positive, SPOC is pro-active.		Team has experience of short notice by-election: Phil Woolas by-election in 2010	EC staff available to respond to queries / issues on polling day, review need for EC staff presence closer to polling day.	
List of further work needed to comprehensively assess risk & build assurance	Plans for PCC and local elections are county-wide and are adapted from longstanding plans tested at all types of election and reviewed in previous years. No concerns during issue of postal votes (w/c 25 April) and no other specific issues raised. Oldham have paid for police support or Royal Mail workers distributing postal votes, and have brought in a member of their Revenues & Benefits team to act as an auditor and spot and patterns and trends in postal vote returns/activities.				

# Region: West Midlands

## Birmingham

Political control:

Labour party:

Conservative party:

Liberal Democrats:

Electoral cycle: 120 seats (61 for majority)

**Elections by thirds – 40 seats**

**Statement of persons nominated for local elections:** <http://www.birmingham.gov.uk/local-elections>

**Statement of persons nominated for PCC:** <http://www.westmidlandspcc.info/news/statement-of-persons-nominated/>

Ward (1 seat each)	Currently held by / Winner at last election	Background and electoral data
Acocks Green	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 5%</b> (national average = 3.8%, local average = 5%)
Aston	<b>Labour (hold)</b>	Historic allegations of election fraud in ward.
Bordesley Green	<b>Labour (hold)</b>	Historic allegations of fraud from ward
Hodge Hill	<b>Labour (hold)</b>	Was flagged as higher risk in 2015 - subject to election petition in 2015
Soho	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 10%</b> (national average = 3.8%, local average = 5%)
Sparkbrook	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 6%</b> (national average = 3.8%, local average = 5%)
Washwood Heath	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 8%</b> (national average = 3.8%, local average = 5%)

**Aston, Soho and Perry Bar** (new) are contiguous and allegations are likely. It is anticipated that allegations will be more likely about bias of polling station staff (like the 2014 Hodge Hill vexatious complaint that Robert Connolly investigated and found to be groundless). Other expected allegations - staff opening ballot boxes and allowing more than one person into polling booth at same time. **Ladywood** is worth monitoring (vexatious complainant previously at Hodge Hill). (RJ 29/4. SPOC advice)

**Note: Sutton Parish Council** – large number of independents who are unfamiliar with election process are giving some cause for concern (RJ 29/4. SPOC advice)

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/ mitigation to date	Plans for further EC action /escalation
Allegations of fraud	9 cases reported in 2015 and all resolved as no further action. For info – 4 cases (24 allegations) relate to s. 13D False information (registration) but NFA as undetectable.				



<p>Media and other local issues</p>	<p>Political background changed in Birmingham – LA is under examination by DCLG.</p> <p>Devolution agreement – Elected Mayors in future.</p> <p>PCC by-election held August 2014</p> <p>Potential PCC allegation - (anti-Semitic, anti-Nazi) – Flynn (Independent candidate) likely to get high media profile. (RJ 29/4. SPOC advice)</p>		<p>RO – very aware of need to monitor interaction between PCC + local polls</p> <p>WM integrity plan is being drawn up by the RO.</p>		
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<p>ERO/RO and police relationships and plans</p>	<p>LA has very close working relationship with WMP. Some discussion of plans to ban other languages from polling stations.</p> <p>Gold commander is ACC Beale. Silver commander is Supt Darren Myles. (RJ 29/4. SPOC advice).</p>		<p>Post-election reviews after each election.</p> <p>Thorough risk assessments.</p>		
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List of further work needed to comprehensively assess risk & build assurance

A third of Birmingham city council's 120 seats are being contested in May 2016. This will be the last election by thirds, with the City Council having been ordered to switch to all-out polls once every four years from 2018.

The 2016 elections will be the first following the Kerslake Review, which exposed decades of inadequate leadership and poor decision making at the council and resulted in the imposition by the Government of the Birmingham Independent Improvement Panel. There have been a number of critical reports from the Improvement Panel about slow progress in delivering the Kerslake review recommendations and clear warnings from the Government that Commissioners might have to be sent in to run the council if things did not improve rapidly. A change in political leadership led to Sir Albert Bore standing down and Cllr John Clancy replacing him. The City Council has to make significant spending reductions of about £90 million in 2016-17 and £250 million over the next four years.

Starting position on the council: **Lab 78, Con 30, LD 11, Ind 1**

Labour are defending 28 seats, the Conservatives 8 seats and the Liberal Democrats 4 seats.

Hard fought seats are likely to be **Weoley** (a two vote majority in 2012), **Northfield, Springfield, Kingstanding, Edgbaston, South Yardley, Aston, Soho and Perry Barr.**

A comprehensive Integrity Plan is in place and there is very close and effective working between the Council and West Midlands Police on integrity issues.

Authority will be using the Crimestoppers electoral fraud material in its public awareness work and has a well-developed media strategy.

# Coventry

Political control: Labour

Labour Party: 43

Conservative party: 11

**Statement of persons nominated PCC:** <http://www.westmidlandspcc.info/news/statement-of-persons-nominated/>

**Statement of persons nominated local (including parish) elections:**

[http://www.coventry.gov.uk/info/8/elections\\_and\\_voting/2687/police\\_and\\_crime\\_commissioner\\_city\\_council\\_and\\_finham\\_parish\\_council\\_-\\_elections\\_5\\_may\\_2016](http://www.coventry.gov.uk/info/8/elections_and_voting/2687/police_and_crime_commissioner_city_council_and_finham_parish_council_-_elections_5_may_2016)

Electoral cycle: 54 seats (28 for majority)

Ward	Currently /winner /at last election	
Foleshill	<b>Labour (hold)</b>	Traditionally a higher risk ward – Petition + Prosecution in 2005 (check date)

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/ mitigation to date	Plans for further EC action /escalation
Allegations of fraud	4 cases reported in 2015, 3 resolved as no further action and 1 caution but caution relates to theft case and not RPA offence.		Plans are good. Aware of local issues.		
Media and other local issues					

<p>ERO/RO and police relationships and plans</p>	<p>LA has very close working relationship with WMP.</p> <p>Nothing of note. (RJ 29/4. SPOC advice).</p>				
<p>List of further work needed to comprehensively assess risk &amp; build assurance</p>	<p>Labour is defending a large majority at Coventry City Council on May 5 but could face challenges over several issues including development on the Greenbelt and budget reductions.</p> <p>In terms of “hard fought “ wards <b>Westwood, Woodlands and Bablake</b> are likely to see close contests because of unpopularity over the Labour council’s desire to build houses on up to 10 per cent of the city’s Greenbelt – to increase population and make Coventry a “top ten city”.</p> <p>The Trade Unionist and Socialist Coalition is standing in all 18 seats too, on an anti-austerity platform. Its leader Dave Nellist will again stand in the inner-city ward of <b>St Michael’s</b> which he has represented in the past.</p> <p>A comprehensive Integrity Plan is in place and there is very close and effective working between the Council and West Midlands Police on integrity issues.</p> <p>The authority will be using the Crimestoppers electoral fraud material in its public awareness work and has a well-developed media strategy. The Authority has confirmed that they are publicising the initiative and will also be retweeting the Crimestoppers campaign.</p> <p>General communication plans – and plans between police and LA</p>				

# Derby City Council

Political control: Labour

Labour party: 27

Conservative party: 14

Liberal Democrats: 7

UK Independence Party: 2

Independent: 1

Electoral cycle: **Elections by thirds – 17 seats**

**Statement of persons nominated PCC:** <http://www.derby.gov.uk/council-and-democracy/councillors-democracy-elections/2016-pcc-election/>

**Statements of persons nominated local council election:** <http://www.derby.gov.uk/council-and-democracy/councillors-democracy-elections/local-elections-2016/>

Derby are PARO for Derbyshire

Ward (1 seat each)	Currently held by / Winner at last	Background and electoral data
Normanton	Labour (hold)	Postal vote rejection rate = 11% (national average = 3.8%, local average = 6%)

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/mitigation to date	Plans for further EC action /escalation
Allegations of fraud	1 case reported in 2015 but not relating to an RPA offence.		Whistleblower issue 2014. But electoral fraud aspect was minimal.		
Media and other local issues					

<p>ERO/RO and police relationships and plans</p>	<p>V. good relationship with Police.  Econ crime unit very involved in election planning</p>		<p>RO goes on patrol with Police on election day.  RO first time PARO, very aware of local election issues so lots of work on cross authority working.</p>		
<p>List of further work needed to comprehensively assess risk &amp; build assurance</p>	<p>Labour currently hold 29 out of the 51 seats on the Council. Local Elections are taking place in all 17 wards across the City together with the PCC Elections. The Returning Officer at Derby is also the PARO for Derbyshire and this will be the first time that Derby have undertaken this role. There are no particular wards in the City which are expected to be particularly hard fought.</p> <p>Following the prosecutions for electoral fraud involving a poll clerk, and others, in the 2012 elections the Returning Officer has developed very close links with the Police and all allegations are taken very seriously. A detailed Integrity Plan is in place and the Police have been involved with planning for the May 2016 elections. The PARO and each LRO have excellent working relationships with both Operational and SPOC police colleagues and they provide advice and guidance and attend planning meetings and C&amp;A Meetings in the planning phase in the lead up to these elections. A Police Area Integrity Plan has been developed and circulated across the county. Logs of concerns and incidents are kept by the PARO and each LRO and reviewed regularly. Presiding Officers are also provided with a copy of Fast Action Guide where personation or integrity issues arise at polling stations.</p> <p>We are aware of an investigation regarding an election agent presenting a nomination form for a candidate in the local election which allegedly contains false signatures. The SPOC has confirmed there are issues with all eight forms submitted by this particular agent. The police are working very closely with the RO who is fully aware of progress.</p>				

# Walsall

Political control: **NOC**

Labour Party: **27**

Conservative party: **25**

Liberal Democrats: **2**

UK Independence Party: **3**

Independent: **2**

Independent Labour:

Democratic Labour 1

Electoral cycle: **Elections by thirds – 20 seats**

**Statement of persons nominated PCC election:** [http://cms.walsall.gov.uk/index/council\\_and\\_democracy/elections.htm](http://cms.walsall.gov.uk/index/council_and_democracy/elections.htm)

**Statement of persons nominated local election:** [http://cms.walsall.gov.uk/index/council\\_and\\_democracy/elections.htm](http://cms.walsall.gov.uk/index/council_and_democracy/elections.htm)

Ward (1 seat each)	Currently /winner at last election	Background and electoral data
Palfrey	<b>Labour (hold)</b>	Historically high risk of fraud allegations
Pleck	<b>Labour (hold)</b>	Historically high risk of fraud allegations

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/mitigation to date	Plans for further EC action /escalation
Allegations of fraud	No cases reported in 2015.				
Media and other local issues					



<p>ERO/RO and police relationships and plans</p>	<p>Members of WM partnership</p> <p>Nothing of note (RJ 29/4. SPOC advice).</p>		<p>Staff accustomed to working with Birmingham.</p> <p>Good RO and key staff are well experienced. (RJ 29/4. SPOC advice)</p>		
<p>List of further work needed to comprehensively assess risk &amp; build assurance</p>	<p>The Council is currently run by the Conservative Party supported by UKIP and the Independents giving them an overall majority. Elections are taking place in all 20 of the wards in the Borough.</p> <p>There are likely to be “hard fought” contests in the <b>Bloxwich West, Brownhills and Willenhall North</b> wards.</p> <p>A comprehensive Integrity Plan is in place and there is very close and effective working between the Council and West Midlands Police on integrity issues. Walsall also works closely with Birmingham and Coventry on integrity issues.</p> <p>Note for post 2016 - consider deleting Coventry and adding:</p> <p><b>Sandwell</b> (not one of 18 high risk areas but worth keeping an eye on St Paul’s ward – has had problems).  <b>Wolverhampton</b> (not one of 18 high risk areas but has had problems and experienced ESM has left).</p>				

## Region: Eastern and South East

### Woking (SE)

Political control: Conservative

Conservative party: 24

Liberal Democrat: 9

Labour Party: 2

Independent: 1

Electoral cycle: Election by thirds; 36 seats up in 2016 (19 for majority)

**Statement of persons nominated PCC:** <http://www.woking.gov.uk/council/election/forthcomingelections/pccsopn>


**Borough statement of persons nominated borough election:**

<http://www.woking.gov.uk/council/election/forthcomingelections/spn2016>

Ward (1 seat each unless stated)	Currently / winner at last election	Background and electoral data
MAYBURY & SHEERWATER	Liberal Democrat	Old boundaries have been revised, but still potential risk of allegations

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/ mitigation to date	Plans for further EC action /escalation
Allegations of fraud	<p>3 cases reported in 2015 but all resolved</p> <p>RO: Outcome of Petition has had calming effect on allegations, people feel warned of potential outcome to attempts at fraud.</p>				
Media and other local issues					

<p>ERO/RO and police relationships and plans</p>	<p>Experienced SPOC – successful petition has increased awareness within police force.</p>		<p>Woking's integrity plan and risk register for the May polls:</p> <p style="text-align: center;">             Integrity_Plan_2016.docx         </p>	<p>EC going to meet RO &amp; SPOC 4/12/15. PS update 15/4/16: PS &amp; RJ met the RO; ESM and SPOC. Very positive meeting, RO reported a positive impact locally as a result of the petition case outcome however emphasised strongly that he is not complacent and will work hard to promote integrity at the May polls. Meeting notes: <a href="http://skynet/dm/Programmes/May2016/May%202016/Notes%20of%20meeting%20at%20Woking%20Borough%20Council.docx">http://skynet/dm/Programmes/May2016/May%202016/Notes%20of%20meeting%20at%20Woking%20Borough%20Council.docx</a></p>	
<p>List of further work needed to comprehensively assess risk &amp; build assurance</p>	<p>General communication plans – and plans between police and LA</p>				

## Peterborough (E)

Political control: No overall control

Conservative Party: 26

Labour Party: 12

Independents: 7

Liberal Democrats: 4

Liberals Party: 3

UK Independence Party: 4




Electoral cycle: thirds; however following an electoral review all seats (60) are up for election in 2016. Following this the Council will revert to electing by thirds. [Peterborough Electoral Changes Order](#)

**Statement of persons nominated for local elections:** <https://www.peterborough.gov.uk/council/elections/election-details/>

**Statement of persons nominated for PCC:** <https://www.peterborough.gov.uk/council/elections/police-and-crime-commissioner-election/>

Ward (1 seat each unless stated)	Currently / winner at last election	Background and electoral data
Central	<b>Liberal (gain from Conservative)</b>	<b>Postal vote rejection rate = 21%</b> (national average = 3.8%, local average = 10%)
Park	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 13%</b> (national average = 3.8%, local average = 10%)
Ravensthorpe	<b>UKIP / Conservative (hold)</b>	<b>Postal vote rejection rate = 16%</b> (national average = 3.8%, local average = 10%)

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/ mitigation to date	Plans for further EC action /escalation
Allegations of fraud	<p>4 cases reported in 2015 but all resolved as no further action or were resolved locally.</p> <p>Quiet election in 2015, but there were some concerns about a rise in Proxy votes, and some voters reported being unaware that they had been appointed a proxy.</p>		<p>Peterborough's integrity plan:</p>  <p>Integrity Plan 2016.docx</p> <p>Elections Project plan:</p>  <p>Project Plan version 1 2016.docm</p> <p>Risk Register:</p>  <p>Risk-register 2016.doc</p>	<p>JW meeting with Stewart Jackson MP in September to discuss range of concerns including integrity.</p>	
Media and other local issues					

<p>ERO/RO and police relationships and plans</p>				<p>PS &amp; RJ met with the RO; ESM; Director and Compliance Manager (Governance) on 13/1/16. Positive meeting that provided reassurance re the RO's planning for the May polls. PS notes:</p> <p><a href="http://ecscrm11/CM/userdefined/edit.aspx?etc=4201&amp;id=%7b65AEB0E8-BCDE-E511-B9A5-005056A70053%7d">http://ecscrm11/CM/userdefined/edit.aspx?etc=4201&amp;id=%7b65AEB0E8-BCDE-E511-B9A5-005056A70053%7d</a></p>	
<p>List of further work needed to comprehensively assess risk &amp; build assurance</p>	<p>General communication plans – and plans between police and LA</p>				

# Slough (SE)

Political control: Labour

Labour Party: 32

Conservative Party: 9

UK Independence Party: 1

Electoral cycle: thirds; 42 seats up in 2016

**Statement of persons nominated for combined borough council and PCC elections:** <http://www.slough.gov.uk/council/voting-and-elections/2016-combined-police-and-crime-commissioner-and-local-elections.aspx>


<b>Ward (1 seat each unless stated)</b>	<b>Currently / Winner at last election</b>	<b>Background and electoral data</b>
Baylis & Stoke (3 Cllrs)	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 9%</b> (national average = 3.8%, local average = 6%)
Wexham Lea (3 Cllrs)	<b>Labour (hold)</b>	<b>Postal vote rejection rate = 8%</b> (national average = 3.8%, local average = 6%)



## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/ mitigation to date	Plans for further EC action /escalation
Allegations of fraud	2 cases reported in 2015. 1 case resolved as no further action and 1 still undergoing investigation which relates to s.65(A) 1 (i) False statement on nomination form		Resources are challenge for ESM. High staff turnover. Dates for meeting in Jan. Discuss Pborough Unitary authority so data sharing easier than some.		

<p>Media and other local issues</p>	<p>V. mobile population</p> <p>No PARO appointed for TV EC will need to meet when appointed to highlight local &amp; PCC risks. PAROs need to be alive to risk of ineligible PCC candidates due to prior convictions.</p> <p>2015 case highlighted in media about politician handed suspended sentence for fraud:  <a href="http://www.sloughobserver.co.uk/news/14436699">http://www.sloughobserver.co.uk/news/14436699</a>  <u>.Politician handed suspended sentence for electoral fraud/</u></p>				
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<p>ERO/RO and police relationships and plans</p>	<p>SPOC in TVP is v. experienced.</p>		<p>Pro-active measures in place in 2015, hopefully repeat 2016. Slough's integrity plan and risk register:</p>  <p>Integrity Plan 2016 with Risk Register Jar</p>	<p>PS &amp; RJ met the RO and ESM on 20/1/16. Positive meeting. NB ESM is leaving the authority on 15/4/16. An AEA consultant is in place for the May polls. PS notes:</p> <p><a href="http://ecscrm11/CM/userdefined/edit.aspx?etc=4201&amp;id=%7b5994AD20-BCDE-E511-B9A5-005056A70053%7d">http://ecscrm11/CM/userdefined/edit.aspx?etc=4201&amp;id=%7b5994AD20-BCDE-E511-B9A5-005056A70053%7d</a></p>	
<p>List of further work needed to comprehensively assess risk &amp; build assurance</p>	<p>General communication plans – and plans between police and LA</p>				

# Luton council

Political control: Labour

Labour Party: 35

Liberal Democrats: 8

Conservative Party: 5

Electoral cycle (2 seat wards unless stated): full council elections every 4 years; next local elections 2019

**Statement of persons nominated PCC:** [http://www.luton.gov.uk/Council\\_government\\_and\\_democracy/Local-democracy/Elections/Pages/Police-and-Crime-Commissioner-%28PCC%29-Elections.aspx](http://www.luton.gov.uk/Council_government_and_democracy/Local-democracy/Elections/Pages/Police-and-Crime-Commissioner-%28PCC%29-Elections.aspx)

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/ mitigation to date	Plans for further EC action /escalation
Allegations of fraud	<p>1 case reported in 2015 – no further action and not RPA offence</p> <p>Added by PS 15/4/16; PS' telecon with the RO Trevor Holden in February 2014:  <a href="http://ecscrm11/CCM/userdefined/edit.aspx?etc=4202&amp;id=%7bC714942A-8798-E311-BDF9-005056A70053%7d">http://ecscrm11/CCM/userdefined/edit.aspx?etc=4202&amp;id=%7bC714942A-8798-E311-BDF9-005056A70053%7d</a></p>				
Media and other local issues					

<p>ERO/RO and police relationships and plans</p>	<p>Beds Police relied on PCSOs at poll stns but many fewer in 2016. Red rated stations have more visits - not full-time presence.</p> <p>6 polling stations in Luton are red rated by police.</p>		<p>PS is seeking an updated integrity plan from Luton, to be added here once received.</p> <p>Only PCC elections – not seen as big risk, all is very quiet. SPOC expects no more than poster theft or damage allegations (3/5).</p>		<p>PCSO cuts likely prob in busier years.</p>
<p>List of further work needed to comprehensively assess risk &amp; build assurance</p>	<p>General communication plans – and plans between police and LA</p>				

Region: London

## Tower Hamlets Council

Political control:

Labour Party:

Tower Hamlets First Party:

Conservative Party:

Electoral cycle: full council elections every 4 years

**Statement of persons nominated:**

[http://www.towerhamlets.gov.uk/lgnl/council\\_and\\_democracy/elections\\_voting/election\\_2016/Election\\_2016.aspx](http://www.towerhamlets.gov.uk/lgnl/council_and_democracy/elections_voting/election_2016/Election_2016.aspx)

## Risk summary table

Category	Description of risk / issue	Risk rating (RAG)	Local Authority/Police action/mitigation in place for managing risk	EC action/ mitigation to date	Plans for further EC action /escalation
Allegations of fraud	32 cases reported in 2015 and 5 cases are still unresolved Of the unresolved cases, 1 relates to s.115 undue influence and awaits prosecution advice. 3 of the 4 remaining unresolved cases relate to personation at polling station and the final case is recorded as 'Voting - Other' and does not relate to an RPA offence. 27 cases have been resolved locally or recorded as no further action.				
Media and other local issues					

<p>ERO/RO and police relationships and plans</p>	<p>John Williams retired from LB Tower Hamlets at the Oct 2015. Will Tuckley (former Chief Exec at LB Bexley) has now taken up his position as Chief Exec at Tower Hamlets and will also be the new ERO and Returning Officer.</p>				
<p>List of further work needed to comprehensively assess risk &amp; build assurance</p>	<p>General communication plans – and plans between police and LA</p>				



# Region: South West

## Bristol

Political control: No overall control

Labour Party: 30

Conservative Party: 16

Green Party: 14

Liberal Democrats 9:

UKIP: 1

Electoral cycle (2 seat wards unless stated): 70 seats (36 for majority) Elections all seats for first time 2016

**Statement of persons nominated PCC, mayoral and local elections:** <https://www.bristol.gov.uk/voting-elections-legal-notice-for-may-5-elections>

<b>Ward (1 seat each unless stated)</b>	<b>Currently /winner at last election</b>	<b>Background and electoral data</b>
Ashley	Green (hold)	Contains St. Pauls area where issues arose in 2015 i.e allegations from last May included fraud targeted at the population of Somali origin who form one of the three main minority ethnic groups in St Pauls.
Easton	Green (gain)	Issues raised regarding foreign languages spoken in polling station
Eastville	Labour (hold)	High proportion of residents have English as 2 <sup>nd</sup> language
Lawrence Hill	Labour (hold)	Somali candidates – Lab & Con – Somali community was focus of potential alleged fraud attempt in 2015 (St. George E & W)
St George East	Labour (hold)	Historic affecting Somali groups
St George West	Labour (hold)	Historic affecting Somali groups

Risk Summary Table

<b>Category</b>	<b>Description of risk / issue</b>	<b>Risk rating (RAG)</b>	<b>Local Authority/Police action/mitigation in place for managing risk</b>	<b>EC action/ mitigation to date</b>	<b>Plans for further EC action /escalation</b>
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<p>Allegations of fraud</p>	<p>9 cases reported in 2015, 6 of which are not RPA offences. Of the remaining 3 cases, 2 have been resolved as no further action and 1 relating to personation at a polling station remains under investigation.</p> <p>Allegations of false application to vote by post in 2015 – found to be unsubstantiated</p> <p>Personation case was investigated for 9 months but dropped by the CPS in Feb 2016 owing to insufficient evidence.</p>	<p><b>A</b></p>	<p>DRO, a senior manager in the council, held a meeting with Party Group Leaders and the elected mayor on 29/01/16 to alert them to the major integrity issue of the 2015 polls (allegations of false applications) and to reiterate required standards of conduct by party candidates. The candidate in question is standing again in 2016 but for a different party. The Police and Commission attended the meeting to endorse the message.</p> <p>ES provides bulletin for candidates &amp; agents weekly &amp; daily during campaign.</p> <p>Whilst the personation case was dropped by the CPS in early 2016, Bristol plan to publicise it as a warning about electoral fraud.</p> <p>Consideration of historical integrity issues, including proxy voting fraud at 2003 elections, and breach of S66 cautions in 2010 for tweeting has been given in terms of development of the current plan.</p>	<p>Commission has met with DRO and police representative in Dec 15 and Jan 16 to discuss the Bristol integrity strategy and plan in the run up to the May 2016 polls. We have provided guidance to the DRO on production of an integrity plan and have provided samples of other RO/ERO plans to inform their own document. DRO keeps us regularly updated on emerging issues</p>	
<p>Media and other local issues</p>	<p><u>Was reported in press</u></p>				

<p>ERO/RO and police relationships and plans</p>	<p>The DRO and ESM have been liaising closely with DC Niki White at Avon and Somerset Police regarding the May 2015 integrity investigations. Meetings have also taken place with DC White for integrity planning in the run up to the May 2016 poll including review of the RO/ERO integrity plan</p>				
<p>List of further work needed to comprehensively assess risk &amp; build assurance</p>	<p>General communication plans – and plans between police and LA</p>				