



Fraud and Integrity Plan

Electoral Services

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Introduction

In recent years there has been growing concern about maintaining the integrity of our electoral system. Recent cases of electoral fraud in some areas have identified much common ground, with fraud being more likely in areas with marginal contests, small electorates, and turn-outs and in areas with a history of allegations of malpractice. Tackling electoral fraud and malpractice is a priority for the Electoral Registration Officer (ERO), Returning Officer (RO) and the Electoral Services Team, who will continue to maintain best practice in this area.

This policy will be reviewed after each election by the Electoral Services Manager to ensure practice is in line with the latest legislation and guidance.

The strategy outlines the key areas of risk and sets out appropriate guidance and policies for staff in the handling of apparent challenges to integrity, specifically in respect of:

- Postal voting
- Activity in and around polling stations
- Security and transparency at the Count
- Safe storage and transport of official documents, including ballot papers

The strategy also sets out how allegations of fraud or malpractice will be recorded and passed on to relevant authorities.

Postal voting

~~Since 2006, t~~The Electoral Registration Officer ~~has been~~ required to collect and store 'personal identifiers' for each postal voter, comprising a date of birth and a specimen signature. When a postal vote is submitted, it is validated by the checking of a postal voting statement on which the elector is required to provide their date of birth and signature. There have been several cases in the UK relating to fraudulent applications to vote by post and the "harvesting" of completed postal vote packs by those seeking to influence the outcome of an election.

The following measures have been put in place to ensure that:

- Applications to vote by post have been completed by the elector, who is registered to vote at that address, and is qualified to be so.
- That the personal identifiers (date of birth/signature) are legitimate
- If the applicant is unable to sign the form, that good reason and supporting attestation are provided to provide the elector with a signature waiver.
- That postal voting packs are delivered to the correct address, and if sent to a different address to the registered address, the reasons for this are stated and appear to be legitimate.
- That completed postal voting packs are returned to the Council without delay or interference, or if handed in at polling stations, that they are logged and controlled appropriately.

Recent cases of fraud elsewhere in the country have involved those working on behalf of canvassers collecting and fraudulently amending postal voting packs. Candidates and their supporters have a vital role to play in encouraging electors to vote. However, they should not allow themselves to be intermediaries between the elector's vote and electoral staff.

~~Candidates, agents and canvassers should not touch or handle anyone else's postal ballot paper, before or after it has been marked, or act as courier for it irrespective of whether it is sealed in an official envelope.~~

The ERO supports the ~~EC's Electoral Commission's 'Code of conduct for campaigners: electoral registration, postal voting, proxy voting and polling stations'~~ *"Code of Conduct for political parties, candidates and canvassers on the handling of postal vote applications and postal ballot papers"* and this document is underpinned by the Code. ~~The Code~~² recommends that campaigners should not touch or handle anyone else's postal ballot paper, before or after it has been marked, or act as courier for it irrespective of whether it is sealed in an official envelope.

Candidates and agents are encouraged to assist in the process by alerting the RO to any incidents where an elector is having difficulty understanding the process or arranging the return of their postal vote.

¹ This came into force on 01.01.2007, but the date is probably not material

² This will need to be revised as and when section 5-6 of the Elections Act 2022 are brought into force.

Measures to ensure integrity of postal vote application process

1. The ERO will monitor requests for the sending of postal votes to an alternative address to ensure that multiple postal voting packs are not sent to a fraudulent address.
2. The ERO will monitor application forms for similar handwriting, signatures and will liaise with the SPOC if any concerns are raised.
3. Where partially completed forms are received, further information will be requested in writing from applicants to ensure clarity of information.
4. The ERO will monitor the pattern of delivery of postal vote applications and completed postal voting packs, for example, multiple deliveries by one individual.
5. The ERO will ensure that applications for a signature waiver are valid and have the appropriate supporting attestation, including the relationship of the person supporting the application and reason for waiver application.
6. The ERO will confirm an individual's absent voting arrangements in writing following their application or a change in their absent voting arrangements.

Measures to ensure integrity of postal vote receipt and processing

1. On receipt of completed postal ballot packs from the mail system or by individuals, the RO will ensure that they are receipted, accounted for and stored securely until such time that postal votes are to be opened.
2. Postal vote openers and scanning assistants will isolate any postal voting statements or envelopes where suspicions about electoral integrity are raised, for example, due to similar signatures or dates of birth, for further [comparison with other documents analysis](#).
3. The ERO will ensure that applicants for replacement Postal Ballot Papers are requested to come into the issuing offices to collect them, bringing in formal photographic identification, such as driving licence, passport or bus pass. They will be required to sign to confirm that their postal vote has been reissued. In all circumstances where replacement ballot papers are issued, [³steps will be taken to seek to ensure](#) the original ballot paper ~~will be cancelled and is~~ withdrawn from the election and recorded appropriately.
4. Those responsible for the adjudication of postal voting statements will be officially appointed as Deputy Returning Officers with powers to adjudicate on the validity of the postal voting statement. These staff will be trained on the verification of signatures, following the Electoral Commission's [Checking signatures at postal vote openings](#) ~~Guidance on verifying signatures~~.

³ [If the original ballot paper is said to be lost, I am not sure how it could be identified \(if returned\) other than by checking all the counterfoils of postal votes for the relevant electoral number.](#)

[Therefore, I have proposed to reflect this uncertainty in the wording.](#)

5. The RO will ensure that Candidates and agents are aware of the [relevant Electoral Commission Code of Conduct for Handling Postal Ballot Papers, which has been supported by the main political parties guidance](#).⁴
6. The RO will ensure that 100% of postal voting statements received are checked against existing records to ensure personal identifiers match against postal vote applications.
7. The RO will ensure that all Candidates, agents and postal voting agents are aware of the date, time and venue of all postal vote opening sessions so that they have the opportunity to attend and oversee the process.

Activity in and around polling stations

Before Polling Day, the RO will have taken steps to ensure that all electors are aware of the location of their polling station, that it is accessible and that the polling station location is fit for purpose. Presiding Officers will be aware that they may be asked to put the prescribed questions to any elector or their proxy by a candidate or their agents in the event of suspect personation. Presiding Officers play a central role as they are responsible for the security of the polling station. Voters expect polling stations to be run in a calm and orderly manner.⁵

The following measures will be put in place to ensure:

- Voters are able to easily access the polling station without undue interference and establish who is officiating at the polling station
- Any intimidation of voters (or the perception of) is dealt with by Presiding Officers, the RO or Polling Station Inspector without delay, is recorded and if necessary ~~provide~~ information [is provided](#) to the police.
- The eligibility of all electors to vote is established consistently and additional action taken where necessary by the Presiding Officer
- Voters can vote in secret and without undue influence
- Where necessary, assistance to voters is provided by the Presiding Officer in a consistent manner, in line with [EG Electoral Commission](#) guidance
- Presiding Officers ask the prescribed questions where necessary
- Any allegations of personation are recorded appropriately, and action taken where necessary.

~~In line with the law and Electoral Commission Guidance, staff working in polling stations will ensure that each elector is able to vote in secret and without undue influence. It is noted that t~~The [EG Electoral Commission](#) has re-affirmed guidance about the layout of polling stations and that each elector should go to the polling booth individually.

⁴ [This particular code appears to have been withdrawn](#)

⁵ [This may also need to be updated when the relevant provisions of the Elections Act 2002 comes into force.](#)

Measures to ensure integrity in and around polling stations

1. Ballot box lids will be sealed at the start of the poll and the slot sealed at the close of poll.
2. Presiding Officers and Polling Station Inspectors will monitor the conduct of any Candidates, Agents, campaigners or tellers outside their polling station to ensure that voters are not intimidated or unduly influenced.
3. Presiding Officers should make regular checks to the surroundings of the polling station to monitor the above.
4. Presiding Officers will be issued with guidance on how to address issues with campaigners and tellers around polling stations and report all issues to the Electoral Services Team.
5. Candidates and Agents will be issued with [Electoral Commission](#) guidance concerning Tellers and Presiding Officers will ensure that this guidance is adhered to.
6. Presiding Officers will ensure that any candidates, agents or their polling agents inside the polling station are afforded such information as they are entitled to but do not seek to influence voters or interfere with the process
7. Polling Station Inspectors will be in place to troubleshoot any potential disturbances and attend polling stations if disruption should occur.
8. In higher risk areas as deemed by the Returning Officer, police presence will be requested.
9. Presiding Officers will record any issues around suspected personation and report them to the Elections team. The matter will then be referred to the SPOC.

Safe transport and storage of ballot papers and other official documentation

Following the close of poll, the security of the ballot boxes, unused ballot papers and official documents such as the marked register of electors and corresponding numbers' lists (CNLs) is paramount. Ballot boxes are sealed at the close of poll and remain the responsibility of the Presiding Officer until they are handed to the Electoral Services Team at the count venue.

Ballot boxes must be transported to the count venue, accompanied by the Presiding Officer without delay and without interference from third parties.

The Electoral Services Team operate a "ballot box receipt" process to quickly receive and record safe receipt of the ballot boxes, unused ballot papers and official documentation.

Where any concerns are raised with a delay, the Electoral Services Team will liaise with the Presiding Officer, Polling Station Inspectors, and the police in order to locate and transport the ballot boxes and documentation.

Measures to ensure safe transport and storage of ballot boxes and other official documentation

1. The mobile phone details [and](#), home addresses of all presiding officers will be recorded and made available at the count in case any ballot boxes do not arrive in a timely manner.
2. Once all the ballot boxes have been receipted, the Electoral Services Team will check that copies of the marked register and sealed envelope containing the CNL have been returned for each polling station. If any documents have not been placed in the correct packet at the close of poll or if any documentation appears to be missing, Presiding Officers will be contacted without delay. The RO and his staff will take steps to find all documentation and parcel these up safely and securely.

Security and Transparency at the Verification and Count

The count is a high-profile aspect of the elections process, with increasing scrutiny from candidates, agents, campaigners and the media. It is imperative that these parties have confidence in the process and that pro-active steps are taken to address any potential fraud vulnerabilities.

Steps will be taken to ensure that clear information is given to candidates and agents to set expectations and to explain count processes. All staff will be aware of the role of candidates and agents to scrutinise the verification and count and will carry out their duties in such a way as to enable this.

Measures to ensure security and transparency at the Verification and Count

1. All attendees at the count will be by official appointment only.
2. In order to gain entry to the count venue, everyone must be on the official list, and everyone must sign in.
3. Count attendees will be identified by name badges and or wrist bands describing their role as Counting staff, Candidate, Election Agent, Counting Agent, Guest or Media.
4. All attendees at the count are to be issued with information on the count process and expectations for the count. This information will also be emailed to them prior to the count.
5. A separate media area is provided to ensure the media have appropriate facilities and to ensure clear flow of information.
6. The layout of the count venue will be such that the count staff, ballot papers and official documents will be segregated from count attendees.
7. Senior count staff will all receive training ahead of the count on their role and the count process. Those appointed as Deputy Returning Officers with powers to adjudicate on doubtful ballot papers will be trained using [Electoral Commission](#) guidance considering recent court cases on doubtful ballot papers.
8. Senior staff will be trained to ensure that candidates and agents are reminded of their role in observing the count without impeding the process, for example leaning on, or using count tables as desks.

9. Announcements will be made at regular intervals during the count to ensure that all present are aware [when](#) the various stages in the process [are taking place](#).
10. During verification, verified ballot papers will be stored in clear plastic boxes and empty ballot boxes will be stacked and removed from the count area.
11. Adjudication of doubtful ballot papers will be undertaken by senior count staff who have been appointed as Deputy Returning Officers with specific powers to adjudicate on doubtful ballot papers.

Returns of election expenses

The Proper Officer acts as the custodian of Returns and Declarations of Election Expenses after an election (care of Electoral Services); they have no powers to investigate or audit these documents. However, concerns may arise where candidates fail to make submissions and where irregularities are evident in the returns.

Where a candidate fails to make a return of election expenses, official notices will be published as per Section 88 of the Representation of the People Act 1983 and the police informed should the RO believe that an offence may have been taken place.

The returns and declarations are open to public inspection in accordance with Sections 88-89 RPA 1983, a fee of 20p for each side of each page of a copy may be charged in accordance with Reg.10(3) RPR 2001.

Liaison with the Police Single Point of Contact (SPOC)

The Council recognises the importance of liaison with the Police Single Point of Contact (SPOC) on matters relating to potential electoral fraud. The Electoral Commission issues guidance alongside the College for Policing on the shared responsibilities of the Commission, Police Force, Electoral Registration and Returning Officer.

Integrity training for staff

The Electoral Services Manager ensures that the Electoral Services Team are fully trained for their role in tackling electoral fraud and malpractice. As part of their continuing professional development, the Team attend courses run by the Association of Electoral Administrators (AEA) to ensure best practice is embedded in the team's work. The team also pro-actively work with other local authorities in the region to ensure consistency of approach.

Ahead of each election, the Electoral Services Team ensures that 100% of Presiding Officers have attended face to face training with the Electoral Services Team. This training is based on the best-practice template produced by the EC and includes information on the Presiding Officer's role in terms of integrity issues. This includes "what if" scenarios and tests.

In addition, all Presiding Officers receive a copy of the [EC Electoral Commission's](#) booklet for polling station staff, produced for each election, in addition to the Electoral Services manager's written instructions for that specific poll. Poll Clerks receive online training and have access to the Electoral Commission's polling station manual and have the Electoral Service Manager's written instructions. The training requirements of staff and any performance issues are monitored closely by the Electoral Services Team and any performance issues during the poll are dealt with by Polling Station Inspectors. All inspectors are senior council officers, and all Inspectors attend a face to face training session ahead of the election.

In line with the law, the Electoral Services Team and senior officers of the Council hold politically restricted posts and as such are apolitical. All staff working at the election sign a document confirming that they have read and will comply with the [relevant section of the RPA 1983 relating to the Secrecy requirements for the secrecy](#) of the ballot. All staff also sign to confirm that they will not be employed (paid or voluntarily) by or on behalf of any candidate or campaigner, including the signing of nomination papers.

Temporary staff working election duties are not able to actively campaign and work on behalf of political parties. They are also not able to subscribe to a candidate's nomination paper. These disclaimers are put in appointment letters and are monitored. If it comes to light that they have taken part in this activity, they will not be able to [work-undertake](#) election duties.

Philip Hardy, Electoral Services Manager

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