

**Manchester City Council
Report for Information**

Report to: Resources and Governance Scrutiny Committee – 10 January 2023

Subject: Election Act 2022

Report of: The Chief Executive

Summary

To outline the planning and governance arrangements for the implementation of the Elections Act in Manchester, with specific focus on voter registrations, polling station accessibility and voter ID requirements.

Recommendations

The Committee is recommended to note:

- The progress that is being made by the Elections Team and the Election Steering Group in relation to changes that will be introduced by the Election Act 2022 for the Local Elections 4 May 2023.
 - The communication plan for local residents with regard to the changes for the May 2023 polls
 - The changes that will be introduced for polls after the local elections 2023.
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Wards Affected: All

Environmental Impact Assessment - the impact of the issues addressed in this report on achieving the zero-carbon target for the city

The legislative changes brought about by the Elections Act, will have a negative impact on achieving the zero-carbon target across the city.

To date the changes will require a greater number of polling stations across the city to handle longer transaction times, as a result more staff will be travelling across the city to work in stations, some staff are required to use their cars for the role they carry out on polling day.

In addition, it is understood that more paperwork will be required in stations to capture voter information to report back to Department for Levelling Up, Housing & Communities (DLUHC).

The Electoral Services unit are aware of the impacts the Elections Act changes will bring and will continue to actively try to reduce the impact wherever possible.

Equality, Diversity and Inclusion - the impact of the issues addressed in this report in meeting our Public Sector Equality Duty and broader equality commitments

An Equality Impact Assessment has been completed by DLUHC for the changes brought about by the Elections Act 2022. Full details can be found here [Elections Bill equality ass \(parliament.uk\)](https://www.parliament.uk/elections-bill-equality-ass)

It is believed that the introduction of Voter ID in polling stations brought about by the implementation of the Elections Act could impact on protected or disadvantaged groups. The Electoral Services Unit is working with Equalities Specialists in the Equality, Diversity and Inclusion team to review and update the existing Equality Impact Assessments for Polling Stations across the city with regards to both Accessibility and Voter ID in Polling Stations.

Voter Authority Certificates (free Voter ID requests) will be completed via a new Government Portal and has not been included as part of the Equality Impact Assessment as this is not a site or process that the Electoral Services unit have control over.

Manchester Strategy outcomes	Summary of how this report aligns to the OMS/Contribution to the Strategy
A thriving and sustainable city: supporting a diverse and distinctive economy that creates jobs and opportunities	<p>The Our Manchester Strategy sets out the vision for the city to 2025.</p> <p>Local elections provide the opportunity for eligible Manchester residents to elect Councillors to represent them and therefore to influence how the strategy is delivered.</p>
A highly skilled city: world class and home grown talent sustaining the city's economic success	
A progressive and equitable city: making a positive contribution by unlocking the potential of our communities	
A liveable and low carbon city: a destination of choice to live, visit, work	
A connected city: world class infrastructure and connectivity to drive growth	

Full details are in the body of the report, along with any implications for:

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

Financial Consequences – Revenue

The introduction of the Electoral Integrity Programme will place a burden on the local authority in various ways, including, for example, the time administrative staff will need to process applications for Voter Authority Certificates, additional equipment that may be required for some offices or polling stations, and additional poll clerks that will need to be hired for polling day. DLUHC are responsible for providing funding for this additional burden.

Funding will be provided through a hybrid approach comprising of grant payments and Justification Led Bids (JLB). Grants will enable a proportion of the allocation to be distributed via a single grant payment. Justification Led Bids will release funds retrospectively on the basis of evidence of spend.

Manchester have now received their initial grant funding of £79,496. A further grant payment will be provided in April 2023 of £127,431 and again in April 2024 – amount still to be confirmed. The JLB window for local authorities to retrospectively claim additional funding will be in Summer/Autumn 2023 and 2024.

At this stage it is difficult to project the additional costs with any certainty however it is anticipated that the grants and the payments received from the JLB will not cover the full costs of the implementation of the Elections Act. In order to ensure that progress will not be delayed due to lack of funding £200k underspend in the Elections budget in 2021/22 has been carried forward to provide cashflow support until the funding is received

Financial Consequences – Capital

None

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Background documents (available for public inspection):

The following documents disclose important facts on which the report is based and have been relied upon in preparing the report. Copies of the background documents

are available up to 4 years after the date of the meeting. If you would like a copy please contact one of the contact officers above.

Draft SI's – Voter ID Laid 03 November 2022

Elections Act Implementation Timeline

Process map – Voter Authority Certificate application process

Process map – Polling Station Process, Vote in person

1.0 Introduction and Background

- 1.1 The Elections Act 2022 has been introduced to make new provision for and amendments to existing electoral law, which claims to ensure that UK elections remain secure, fair, modern, inclusive, and transparent. This allows the Government to meet some of its 2019 manifesto commitments.
- 1.2 A significant number of different legislative changes relating to both electoral registration and the delivery of elections will come into effect over the next two years. This will impact on the delivery of the Local Elections in 2023, the Local and Mayoral Elections in 2024, and the next Parliamentary General Election, which could happen any time up until January 2025. (Please note - It is anticipated that if a Parliamentary General Election was called after autumn 2023, this would take place on new constituency boundaries). These changes will place significant additional responsibilities and resourcing pressures on Electoral Registration Officers (ERO) and Returning Officers (RO), and their local authorities in the widest sense.
- 1.3 The main changes and timescales for their implementation are:
- 1.4 The changes planned for May 2023 include:
 - Voter ID – Requirement for voters to show an approved form of photo ID at polling stations before a ballot paper is issued.
 - Accessibility Provisions – These relate to the requirement to provide reasonable equipment to assist voters with disabilities in polling stations,
- 1.5 Further provisions will come into effect from July 2023 onwards, and these include
 - Allowing all British citizens living overseas to vote in UK Parliamentary elections, regardless of when they left the UK, with applications required every 3 years
 - Enabling electors to apply online for an absent vote, with both online and paper applications requiring the applicant's identity to be verified
 - Requiring postal voters to reapply every three years, replacing current rules of refreshing their signature every five years
 - Further limit to the number of people an elector may act as proxy for
 - Restricting the handling of postal votes – political campaigners will no longer be permitted to handle postal votes, and the number of postal votes an individual can hand in at a polling station will be limited.
 - EU citizens - a review of the eligibility to vote for some EU citizens
- 1.6 A Schedule setting out the planned changes and their scheduled implementation is attached at Appendix A
- 1.7 This report will set out the work to implement the planned changes, focussing on those that need to be in place for May 2023, namely the Voter ID requirements and Accessibility provisions.

- 1.8 The report also includes the planned approach to communications and ensuring that all residents are aware of the planned changes so they are able to vote.

2.0 The Planned Changes for May 2023

2.1 Voter ID

- 2.1.1 The Voter ID requirements and will be implemented for the May 2023 polls. Requirement for voters to show approved form of photo ID at polling stations before a ballot paper is issued. A list of suitable ID can be found in Appendix B
- 2.1.2 The voter registration / application service for a Voter Authority Certificate (VAC) will be provided centrally by the government digital service, similar to registering to vote. The application process will be handled by a separate portal that is not linked to the Electoral Management System.
- 2.1.3 Whilst full details of how the process will operate are awaited, it is understood that once an application is made, a real time ID check takes place, using national records. The application is then made available to the Electoral Registration Officer (ERO) in the relevant local authority area. Elections staff will then need to determine and process the application before it can be authorised. This will involve checking the applicant is registered to vote (via an API register checking service linked to the ERO's Electoral Management Software provider) and that their photograph is of an acceptable quality. In more complex cases, it will involve checking whether additional identity documents such as uploaded household bills are acceptable forms of evidence of identity. Once an application is approved, the VAC will be printed centrally through a government print contract and despatched directly by Royal Mail. The Voter Authority Certificate will be an A4 paper certificate, with built in security features.
- 2.1.4 The deadline for applications to be made by electors will be 6 working days ahead of polling day. After this cut off, there will also be a provision in exceptional circumstances to enable the ERO to issue a temporary certificate up to 5pm on polling day, where an elector has not received their Voter ID. Electors who report their existing acceptable ID as lost, stolen, destroyed or damaged beyond use after the application date will be able to appoint an emergency proxy up until 5pm on polling day.
- 2.1.5 The new government portal is expected to accept applications from electors from the 16 January 2023. An online training session has been delivered by DLUHC for all administrative staff (Wednesday 14 December) demonstrating the portal. Repeat sessions will be held in January for those unable to attend, but access to the portal is not expected until the new year.
- 2.1.6 Written training information has not been provided to date, however once training documentation has been received, Senior Elections officers, will work through applications to design how the process will work in practice and

subsequently create training guides that can be distributed across the team. A number of dedicated focus sessions will be held by Senior Elections Officers to work through the processes step by step to ensure a full understanding is gained by all staff, prior to processing applications independently. Experienced Officers will be on hand throughout, to assist and support newer staff members who lack knowledge of the overall process.

- 2.1.7 Work is well underway within the Council to plan the 'front door' access, and what is required for the electors' journey and processing of their enquiry. The initial point of contact will be with the Contact Centre/Customer Service Centre. Work has already commenced to consider anticipated transaction and call volumes, the type of enquiries expected, as well as training and support. Work has also been undertaken to review historic demand placed on the Customer Contact Centre over various time periods and covering different types of elections. This work will inform the additional resource required to meet this expected demand. Recruitment for four additional staff members has already started to ensure the demand can be met.
- 2.1.8 Alongside this, work is being undertaken on the Electoral Registration Officer functions, focusing on the back office processes for dealing with VAC applications, as well as Returning Officer functions which includes changes to statutory notices such as poll cards, and what the changes will mean for polling day requirements (inclusive of staffing, management and the setting up of polling stations), command and control arrangements taking into account the increased number of queries Voter ID will generate from stations.
- 2.1.9 DLUHC have advised that transaction times in polling stations will be longer. The elections team have reviewed the likely implications and considered electors in person and the turnout for a local only poll.
- 2.1.10 To determine what transaction volumes could look like, modelling work has been undertaken with the support of Performance, Research and Intelligence (PRI) to support workstreams one and two to estimate demand, by looking at the city's demographics and characteristics, overlaid with electoral turnout and funding assumption transaction times for processing applications. This information is being used to model resourcing requirements for both workstreams, with a focus on requirements between January and May 2023, and to support the communications and engagement work required.
- 2.1.11 Staff numbers have been increased per station to allow for the additional requirements of Voter ID and reporting requirements. An additional five stations have been added to polling places where historical information shows a larger turnout. As yet, the detail of the 'customer journey' in a station has not been finalised and shared by central government, nor have the processes that staff will be required to take, to check ID and capture the necessary information.
- 2.1.12 All staff will receive a variety of training once the information has been received to make them aware of new processes and procedures to enable

them to confidently deliver an efficient and effective service with their polling station.

2.2 Accessibility

2.2.1 The Assistance with Voting for Persons with Disabilities (Principal Area, Parish and Greater London Authority Elections) (Amendments) Rules 2022 came into force on 29 December 2022 and will apply to elections held after 3rd May 2023. These rules introduce a requirement of Returning Officers to provide “equipment as it is reasonable to provide for the purposes of enabling, or making it easier for, relevant persons to vote independently”. These rules also make changes to who will be allowed to be a companion of a disabled voter.

2.3 Reasonable equipment and processes at Polling Stations

2.3.1 The Elections Strategic Lead for Greater Manchester is currently leading on a project to seek a consistent approach at all Polling Stations across the ten Greater Manchester Districts. An officer from the Manchester elections team and an Equalities Specialist Officer from Policy, Performance and Reform are involved with these discussions and meetings are taking place with GM Disabled persons groups to take their views on what can be delivered and how to communicate these provisions to disabled voters.

2.3.2 Draft reasonable equipment provisions suggested by the Electoral Commission and legislative provisions that are being considered as a consistent approach across GM polling stations are detailed below. Those items marked with an asterix* are already routinely provided in Manchester Polling stations.

- Large sample copy of ballot paper displayed in polling station and sample hand held copies for voters to use*
- Tactile Voting Device to assist visually impaired voters to mark their vote on a ballot paper*
- Braille copy of ballot paper*
- Ramps to allow access and egress where required and relevant signage for access *
- Appropriate lighting *
- Chair / seating for voters who cannot stand for long periods
- Magnifiers to increase size of text on a document *
- Polling booth at wheelchair level*
- Name badges for polling station staff so voters are clear who are members of staff
- Here to help signs
- Large chunky pencils
- Pencil grips
- Where available, parking spaces for disabled voters*
- Temporary doorbells where doors are closed and where it may be difficult to get assistance from staff – or workable alternative
- Access to audio versions of ballot papers

- Hearing loops where available / temporary provision to be considered
- Electors may use any specialist devices or Apps that electors may bring with them require to assist them to cast their vote independently*

2.3.3 Other considerations that are also being looked into:

- What can be provided in all stations versus on request in relation to more specialist equipment
- Guide about voting and what assistance is available – including easy read / web versions
- Message on poll cards to request adaptations / equipment

2.3.4 Training for all staff working in Polling Stations to increase awareness / understanding / purpose of equipment.

2.3.5 The Electoral Commission are currently undertaking a statutory consultation from 5 December 2022 until 16 January 2023, on the guidance document they are required to provide to Returning Officers to assist in these provisions.

2.4 Companions of disabled voters

2.4.1 Current rule states that a companion of a disabled elector must also be a registered elector over the age of 18. From 4 May 2023 polls, disabled voters who make a declaration in the Polling station, that they require assistance, will be able to bring any person over the age of 18 as a companion to assist them to cast their vote, thus removing the requirement of being registered to vote.

2.5 Community Engagement and Communications

2.5.1 In order to support the changes outlined for May 2023, a comprehensive communications and engagement campaign is required from January 2023, following the launch of the VAC application portal (expected to go live on 16 January 2023) through to polling day on 4 May 2023.

2.5.2 The EC has responsibility for promoting public confidence and participation in democratic processes, to ensure their integrity and to ensure that voters have all the information they need to vote. EROs also have a responsibility to have in place effective local public engagement strategies to identify people who are not registered and encourage them to register to vote, whilst ROs are responsible for taking appropriate steps to encourage the participation of electors in elections.

2.5.3 Ahead of the local elections in 2023 and once the VAC application portal is in operation, the EC will be running a high-profile national campaign focusing on raising awareness of the requirement for Voter ID, targeting those who may not already have the required photographic ID, so they understand how/where to apply, and ensuring electors know they need to take Voter ID with them in order to vote.

2.5.4 It is proposed that there is GM wide approach to amplify the EC's national campaign to ensure that the key messages are consistently disseminated

widely across Greater Manchester, with each local authority contributing a proportion to purchase GM wide advertising channels to supplement Electoral Commission messaging at a local level.

- 2.5.5 This will include making EC partner materials accessible to a wider audience, for example, additional language translations and/or accessible formats. Effective local engagement activity will be required at a neighbourhood level, utilising local knowledge and local community networks via Neighbourhood Teams, to ensure engagement with underrepresented groups and key target audiences. Learning and experience from previous city-wide engagement activities will be taken on board to ensure a sound approach.
- 2.5.6 The local campaign will mirror the EC's campaign timings and will commence in GM once the VAC portal goes live (this is expected to go live on 16 January 2023).
- 2.5.7 A GM wide channel plan has been drafted to ensure coverage across local channels in all 10 local authority areas. A Manchester specific channel plan will sit alongside this with a focus on Manchester only advertising sites, digital channels, community networks, free and partner channels.
- 2.5.8 A communications plan has been drafted and the approach shared with GM colleagues. The Local Elections 2023 communications approach can be found in Appendix C

2.6 Governance and Capacity

- 2.6.1 A Strategic Elections function has been established, based at Greater Manchester Combined Authority (GMCA) to provide the 10 Greater Manchester districts and GMCA with specialist knowledge and dedicated strategic resource for the next 2 years. The purpose of this function is to provide GM authorities with the knowledge and understanding to prepare for the extensive and complex legislative changes arising from the implementation of the Elections Act 2022, including voter ID requirements, overseas electors' 'votes for life' and online postal vote applications. In addition, the wider implications arising from the Dissolution and Calling of Parliament Act 2022 and the outcomes of the current Parliamentary Boundary review
- 2.6.2 An Elections Act Steering Group has been in place since June 2022 to provide support to the Elections team. The work is supported by a clear project plan covering two phases – Phase one from now until May and Phase two from May onwards. A number of wider services support this work including HROD, ICT, Comms, Neighbourhoods, PRI, risk and finance, working through the significant interdependencies that exist across the different workstreams to ensure these are reflected in the thinking. As part of wider work, the Elections Strategic Lead for Greater Manchester is also in attendance at this Steering Group focusing on areas where close joint working arrangements are desirable for consistency.

- 2.6.3 The resource requirements in the core elections team are being strengthened with additional resource of 6 to support the work required. In addition, a 'bank' of internal MCC staff are also being recruited to provide additional capacity and assist with managing peaks in demand as and when required for example in the 6-week election period.
- 2.6.4 Resources to aid engagement will be provided, these will include:
- A printable leaflet for voters (Translation and easy read will be available)
 - A summary 2-sided leaflet
 - A guide for staff and volunteers
 - Posters and social media assets
- 2.6.5 Wider partner materials are also being developed by the EC which are aimed at specific demographic audiences – those most at risk of not having acceptable photographic ID and so needing to be aware of the free voter ID option, such as 85+, the homeless, people with sight-loss or learning disabilities – which have been co-created with key charities and NGOs.
- 2.6.6 The staffing requirements for May 2023 poll are currently under review, taking into consideration, that there is the potential that additional stations may be needed due to the anticipated increase of transactions times, hence more staff required. Staff who have worked in previous elections will be contacted and allocated to roles from early January. Staff have been notified of next year's poll via Broadcasts, encouraging staff members without a role to get in touch.
- 2.6.7 As Elections is a corporate priority it is a requirement for staff to work or be available if necessary. For this reason staff are made aware that leave should not be booked for both Polling day and the Count. A withdrawal process will be in place for exceptions, which is managed by HR in conjunction with Strategic Leads.
- 2.6.8 Initially members will be briefed at the start of the year on the changes that are being implemented as part of the Elections Act. Focus will be initially around the changes that will affect May 2023 polls. The Member Working Group will also be re-established to provide regular updates as more information becomes available.

3.0 Recommendations

- 3.1 The Committee is recommended to note:
1. The progress that is being made by the Elections Team and the Election Steering Group in relation to changes that will be introduced by the Election Act 2022 for the Local Elections 4 May 2023.
 2. The communication plan for local residents with regard to the changes for the May 2023 polls
 3. The changes that will be introduced for polls after the local elections 2023.

4.0 Appendices

Appendix A - Scheduled implementation plan of the provisions of the Election Act
Appendix B - List of Acceptable ID
Appendix C - Local Elections 2023 communications approach