

Decision Maker: GENERAL PURPOSES AND LICENSING COMMITTEE

Date: 26 September 2018

Non-Urgent

Non-Executive

Non-Key

Title: FEEDBACK ON THE 2018 LOCAL COUNCIL ELECTIONS & VOTER ID PILOT SCHEME

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Chief Officer: Doug Patterson, Chief Executive/Returning Officer

Ward: Not Applicable

1. Reason for report

To advise Members on the key issues relating to the Local Council elections held on Thursday 3 May 2018, the initial findings on the Voter ID Pilot Scheme, and to give Members the opportunity to comment on the electoral arrangements.

2. **RECOMMENDATION**

Members note the content of the report and consider whether there is any feedback they want to give the Returning Officer for him to take into account when planning for future elections or referenda.

Impact on Vulnerable Adults and Children

1. Summary of Impact: Not Applicable
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Corporate Policy

1. Policy Status: Not Applicable
 2. BBB Priority: Excellent Council
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Financial

1. Cost of proposal: Not Applicable:
 2. Ongoing costs: Not Applicable: Local Council Elections held every four years
 3. Budget head/performance centre: Conducting Elections
 4. Total current budget for this head: £500k
 5. Source of funding: London Borough of Bromley funds the Local Council Elections and the Cabinet Office funds the additional costs of the Voter ID Pilot Scheme
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Personnel

1. Number of staff (current and additional): 5 full time staff, 3 casual staff and approximately 1,500 temporary staff (recruited by the Returning Officer) for staffing polling stations, opening and verifying the postal votes, and counting the votes
 2. If from existing staff resources, number of staff hours: Not Applicable
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Legal

1. Legal Requirement: The Council is required to appoint one of its officers as Returning Officer for local council elections under the provisions of section 35 of the Representation of the People Act 1983. The Returning Officer is personally responsible for the conduct of elections.
 2. Call-in: Not Applicable:
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Procurement

1. Summary of Procurement Implications: Not Applicable
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Customer Impact

1. Estimated number of users/beneficiaries (current and projected): c240,000 registered electors, candidates, agents and staff
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Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: Not Applicable

3. COMMENTARY

- 3.1 Local Council elections were held in Bromley on Thursday 3 May 2018, electing sixty (60) councillors in twenty two (22) wards. These elections are held every four years, but unlike the last Local Council elections in 2014 (when the elections were combined with the European Parliamentary elections) and in 2010 (when the elections were combined with a UK Parliamentary (General) election) no other polls were held with these elections this year.
- 3.2 Reports identifying the proposed arrangements around polling stations, the appointment of staff, the counting of the votes and the voter identification pilot scheme were considered by this Committee on 12 September 2017, 6 February 2018 and (a briefing note) on 20 March 2018.
- 3.3 The delivery of these elections is the responsibility of the Returning Officer (the Chief Executive). His duties as a Returning Officer are separate from his duties as a local government officer. He is **not** responsible to the Council but is personally responsible for the conduct of the elections and is directly accountable to the courts as an independent statutory office holder.
- 3.4 Bromley was one of five local authorities along with Gosport, Swindon, Watford and Woking selected by the Cabinet Office to conduct Voter ID pilots at these elections on 3 May 2018. Further details are set out later in this report.

NOMINATIONS AND CANDIDATES

- 3.5 Nominations were accepted by the Returning Officer from Tuesday 27 March 2018 to Friday 6 April 2018. In total 228 candidates were validly nominated for these elections. The table below shows the number of candidates for each party:
- Conservative Party – 60
 - Green Party – 23
 - Independent – 3
 - Labour Party – 60
 - Liberal Democrat Party – 60
 - Libertarian Party UK – 1
 - The For Britain Movement – 1
 - UKIP – 19
 - Women’s Equality Party – 1
- 3.6 The greatest number of candidates (14) stood in Cray Valley West ward, and the least number (4) stood in the Darwin ward.

REGISTERING TO VOTE

- 3.7 The statutory deadline for registering to vote at these elections was Tuesday 17 April 2018 (12 working days before polling day).
- 3.8 Following experience at recent polls, it was anticipated that there would be a high number of applications for registration close to the deadline, as it is now easier and quicker for residents to register online.
- 3.9 The total number of registration applications received (online/paper/phone) between 1 March and 17 April 2018 was **6,283**, of which **2,062** were duplicate applications (i.e. an application can be matched to an individual already on the register at the same address). These figures

were significant lower than at last year's General Election when 22,007 registration applications were received with 7,918 duplicate applications.

POLL CARDS

- 3.10 Poll cards were sent out by Royal Mail to some 240,000 registered electors on Tuesday 27 March 2018. A further 7,000 or so were issued up to a week before polling day, to those residents who registered close to the relevant deadlines.
- 3.11 Two types of poll cards were issued to:
- Postal voters – printed in the traditional A5 card format with details of the elector and when/where their postal vote would be despatched
 - Polling station voters – printed in an A4 letter format (enclosed in an envelope) specifically designed for these elections with the usual information on the front (i.e. the elector's details, their allocated polling station, polling hours and any notes specific to that polling station), and information regarding the testing of ID on the back, with a full list of the acceptable forms of ID that could be taken to the polling station

APPOINTMENT OF STAFF

- 3.12 In the early stages of planning, it was agreed with the Cabinet Office that given the additional requirements of the Voter ID pilot to record information and the extensive list of forms of ID being tested, the Returning Officer would appoint extra poll clerks, to ensure that all polling stations ran smoothly. Cabinet Office agreed to fund these additional costs and most polling stations were adequately staffed with one presiding officer and three poll clerks.
- 3.13 The Returning Officer appointed to a total of 1,475 roles at these elections. Roles included those at the polling stations, opening & verifying postal votes and counting the votes. Several individuals fulfilled different roles, and approximately 900 different people were appointed. Only 150 of these were Bromley Council officers/employees.

POSTAL VOTING

- 3.14 **Issue of Postal Votes:** The total of number of postal vote packs issued at these elections was **37,341** with the bulk of these being sent out from the printers by first class post on Thursday 19 April 2018. Voters who had opted for permanent postal votes and those who had applied up until 4 April 2018 were included in this dispatch. Residents who applied after this date and up until the deadline of Wednesday 18 April 2018 (some 1,250 voters) received their postal votes a few days later.
- 3.15 A small number of complaints were received from residents about the non-receipt of their postal vote pack, and 36 replacement postal vote packs were issued (up to 5pm on polling day).
- 3.16 **Receipt and verification of Postal Votes:** As usual there was a good return of postal vote packs with 26,314 (70.47%) being returned at these elections by 10pm on Thursday 3 May 2018.
- 3.17 The personal identifiers (signature and date of birth) on every returned postal vote statement in each pack, must be checked and verified against those held on file from the original applications – this is a huge logistical operation requiring suitable accommodation (the Great Hall) for two weeks or so before polling day, and is totally dependent on IT systems and staff.

3.18 Over 26,000 personal identifiers were checked with 472 postal votes being rejected (in accordance with the Electoral Commission Guidance which has been developed by experts from the Forensic Science Service). The table below shows the details at ward level:

WARD	Postal Votes Issued	Postal Votes Returned	Returned %	Postal Votes Rejected
Bickley	2201	1559	70.83%	23
Biggin Hill	1013	720	71.08%	11
Bromley Common & Keston	2084	1479	70.97%	37
Bromley Town	2036	1420	69.74%	26
Chelsfield & Pratts Bottom	1764	1209	68.54%	26
Chislehurst	2388	1598	66.92%	28
Clock House	1631	1154	70.75%	22
Copers Cope	2163	1578	72.95%	30
Cray Valley East	1889	1271	67.28%	23
Cray Valley West	1607	1078	67.08%	35
Crystal Palace	1104	723	65.49%	18
Darwin	695	481	69.21%	6
Farnborough & Crofton	2057	1552	75.45%	24
Hayes & Coney Hall	1933	1378	71.29%	22
Kelsey & Eden Park	2036	1465	71.95%	20
Mottingham & Chislehurst N	862	551	63.92%	7
Orpington	1910	1341	70.21%	15
Penge & Cator	1489	1037	69.64%	29
Petts Wood & Knoll	1746	1304	74.68%	11
Plaistow & Sundridge	1573	1103	70.12%	13
Shortlands	1251	895	71.54%	21
West Wickham	1909	1418	74.28%	25
TOTAL:	37341	26314	70.47%	472

3.19 Personal identifiers are checked by scanning the relevant document (postal vote statement) so a match can be checked by the IT system. Where the system cannot make a match then a manual check of dates of birth and signatures is undertaken.

3.20 The Electoral Commission's advice is that staff should only reject postal voting statements when they cannot satisfy themselves that the statement has been duly completed with a genuine signature, and that a signature shows 'major and significant differences' before deciding they are not so satisfied. This is carried out by a core team of staff who are trained by fraud experts in the techniques required to decide whether to accept or reject a signature.

3.21 Once the personal identifiers were verified, the postal ballot papers were placed in ballot boxes, sealed and stored securely before being transported to the count venue on the evening of polling day

POLLING STATIONS

3.22 The following changes were made to the polling stations used at these elections:

New Venue – St Mary's Green Street Green Church Hall, Worlds End Lane in place of Green Street Green Primary School in Chelsfield and Pratts Bottom ward (following a request by the Head teacher)

New Venue – Neighbourhood Church, Cromwell Road in place of Balgowan Primary School in Clock House ward (following a request by the Head teacher)

New Venue – Darrick Wood Infant School, Lovibonds Avenue in place of Darrick Wood Community Centre in Farnborough and Crofton ward (as the previous arrangements at the Community Centre had not worked, as the premises were not suitable for the voters)

New Venue – Avenue Road Baptist Church Hall, 94 Avenue Road in place of St Michaels and All Angels Church in Clock House ward (following late notification of major building works)

Change of entrance – Mottingham Primary School in Mottingham and Chislehurst North ward (following a request by the Head teacher, and in order to assist her in keeping the school open, we agreed a change of building within the school grounds and a change of entrance from Ravensworth Road to Mottingham Road)

- 3.23 In all instances information was included on the poll cards to draw the changes to the attention of the voters prior to polling day, and signage was displayed at the previous polling place entrances, to remind voters of the change. The changes were also drawn to the attention of Councillors, candidates and agents.
- 3.24 Initial feedback from polling staff and voters indicates that arrangements at the new venues worked well.
- 3.25 However a number of verbal complaints were made on the day to the polling staff about the change of building/entrance at Mottingham Primary School, and a written complaint was made to the Returning Officer after the elections by the Labour party election agent about the changes.
- 3.26 The Returning Officer takes these complaints very seriously and responded with full details on how and why the changes were made to the polling arrangements at Mottingham Primary School. He is quite satisfied that the changes were adequately considered in advance of the elections and that the changes were drawn to the attention of all electors, Councillors, candidates and agents.
- 3.27 There were also incidents at the following Polling Stations:
- Leasons Hill Primary School – building works caused parking and access issues
 - One Head teacher initially refused delivery of polling equipment
 - The Mobile Unit at Leaves Green – generator temporarily ran out of fuel
- 3.28 Although the Returning Officer has the right by law to use a room in a school for polling purposes (and receives encouragement from successive Governments to do so), he will, if requested, work with Head teachers wherever possible to agree alternative arrangements to enable the school to remain open (as was the case with Mottingham Primary School, Edgebury Primary School, Valley Primary School). He will also consider suggested alternative premises (as was the case with Green Street Green Primary School and Balgowan Primary School). However, any changes must enable the voting arrangements to be as good as those previously particularly in regard to access, suitability and facilities.
- 3.29 A small number of Head teachers do make it difficult for the delivery/collection of polling equipment (polling booths, signage and ramps), and some restrict the use of kitchen and toilet facilities to the polling staff, or close off access gates. The Returning Officer will continue to work with Head teachers, but ultimately must put the welfare of his staff and the convenience

to the voters first which may lead to schools where there have been issues of this nature, closing on election day in the future.

- 3.30 The Returning Officer is required to review the current polling arrangements across the borough early next year. This is a formal process and will include widespread consultation. The Returning Officer will be pleased to receive representations at the appropriate time on the current arrangements and any prospective changes so as to ensure the best possible polling arrangements for the voters of Bromley are maintained.

THE VOTER ID PILOT SCHEME

Forms of ID:

- 3.31 The Returning Officer and his staff worked closely with the Cabinet Office to agree the extensive and readily available forms of ID to be accepted at the polling stations in Bromley on 3 May 2018. Regard was given to the Equalities Impact Assessment that had been carried out and scrutinised by the Cabinet Office, the Electoral Commission and the Association of Electoral Administrators. Voters were required to show either one form of photographic ID, or two forms of non photographic ID (one of which needed to include the registered address of the voter). The full list of accepted ID in Bromley is set out in **Appendix 1**.
- 3.32 If an elector was unable to provide any of the acceptable forms of ID, they could either apply for a postal or proxy vote by the appropriate statutory deadline, or the Pilot Scheme introduced a new arrangement where an elector could apply (free of charge) for a certificate of identity by 5pm on 2 May 2018 (the day before the Poll), if they were not able to satisfy the ID requirements thus ensuring that no one who was eligible to vote was prevented from voting because they didn't have the right ID.
- 3.33 Where a voter was unable to present the required form of ID at the polling station, they were refused a ballot paper and unable to vote. However, they were given a leaflet with details of the correct ID and had the opportunity to return to the polling station by 10pm.
- 3.34 A Pilot Order allowing the changes to the electoral process in Bromley was signed by the Minister of the Constitution in the Cabinet Office on 16 January 2018.

Public Awareness:

- 3.35 There was an extensive and targeted awareness campaign (funded by the Cabinet Office) to make sure that every eligible elector knew they needed to take ID to a polling station to vote – it wasn't in anyone's interest that people were disenfranchised.
- 3.36 Officers worked closely with the Cabinet Office agreeing the branding and logo of the public awareness materials. The message was kept short and simple 'Bring ID to vote on 3 May' and was used on posters, leaflets, billboards and all communications sent out in regard to the elections.
- 3.37 The campaign was launched in January using a wide range of mechanisms to get the message across to residents and included:
- Sending posters and leaflets to some 500 community organisations
 - Placing bill boards in prime locations in Bromley including bus stops, railway stations and shopping centres
 - Targeting use of social media - Facebook and twitter
 - Issuing regular local press releases

- Placing full page adverts in local newspapers and magazines
- Producing short video clips
- Spreading the word through Community Links with particular emphasis on hard to reach groups

3.38 However the main focus of the campaign was five ‘through the door’ communications to every household/elector in the borough through a Household Notification letter, a post card, a leaflet with the Council’s publication ‘Environment Matters’, a leaflet with the Council Tax billing and a re-designed poll card.

Evaluation:

3.39 As part of the evaluation process, the Cabinet Office and the Electoral Commission required the polling staff to record the types of ID produced, where an elector was turned away for having no ID or wrong ID, and where an elector returned to vote. This was recorded on a version of the polling station register designed to capture prescribed information. The register also captured information on voters who had originally attended without the correct ID but who subsequently returned with it to vote.

POLLING DAY

3.40 Polling day went smoothly with the Returning Officer and his Deputy visiting many polling stations throughout the day. They spoke to a large number of voters and were struck that most thought that producing ID to vote was a sensible idea and that it should definitely be rolled out. Feedback from polling staff was that the vast majority of voters knew what they had to bring in order to vote and were not dissuaded from voting by this measure.

3.41 There was occasional journalistic and social media traffic on the ID pilot during the day, some presented in a sensational way. A small number of voters took the opportunity to object to the pilot to polling staff.

3.42 The requirement of checking and recording the voters’ ID did not cause polling staff any significant issues at the polling stations, helped by the appointment of an additional poll clerk (funded by the Cabinet Office) at most polling stations to ensure that the process run smoothly and reduce the risk of queues forming.

3.43 Polling finished at 10pm and presiding officers returned their sealed ballot boxes together with other election equipment and materials to the Bromley Civic Centre where the ballot paper accounts were checked for arithmetical errors, and staff opened and verified the final postal votes which had been handed into the polling stations and Civic Centre by 10pm). The sealed ballot boxes were then loaded on to waiting vehicles and delivered to the count venue at Kent County Cricket Ground for the counting of the votes the next day on Friday 4 May 2018.

3.44 Overall turnout at these elections in Bromley was similar at 40% to the overall 41% recorded at the last Local Council elections in 2014 (combined with the European Parliamentary Elections). This overall turnout is higher than neighbouring London Boroughs:

London Borough	Overall Turnout 2018
Bexley	37%
Croydon	32%
Lambeth	34%
Lewisham	37%

3.46 The table below shows the turnout by ward in Bromley:

WARD	2014	2018
Bickley	42%	43%
Biggin Hill	41%	40%
Bromley Common & Keston	40%	36%
Bromley Town	37%	40%
Chelsfield & Pratts Bottom	47%	42%
Chislehurst	39%	39%
Clock House	42%	46%
Copers Cope	39%	45%
Cray Valley East	36%	32%
Cray Valley West	35%	29%
Crystal Palace	37%	35%
Darwin	48%	40%
Farnborough & Crofton	45%	44%
Hayes & Coney Hall	42%	41%
Kelsey & Eden Park	42%	42%
Mottingham & Chislehurst N	36%	33%
Orpington	43%	38%
Penge & Cator	40%	40%
Petts Wood & Knoll	46%	47%
Plaistow & Sundridge	37%	40%
Shortlands	44%	43%
West Wickham	44%	42%

THE COUNT

- 3.47 The Returning Officer was personally responsible for the verification and counting of the votes at these elections. The report to this Committee on 12 September 2017 outlined the factors on the timing of the count. Having taken Members comments into consideration, the Returning Officer decided on commencing the count the next morning (Friday 4 May 2018) at 8.30am.
- 3.48 The process took place at the Kent County Cricket Ground in Beckenham. The layout of the count was changed from previous electoral events held at this venue, in order to ensure that all the proceedings were carried out in clear view of the candidates and agents. Feedback received about this layout has been positive and the Returning Officer sees merit in using this layout at future elections.
- 3.49 Most counting staff appointed by the Returning Officer were well rested following polling day, reducing errors, mistakes and unnecessary re-counts and giving safe and accurate counts.
- 3.50 The Local Council election counts are the most difficult and complex to organise and manage as there are twenty two (22) ward counts that are run separately but simultaneously. In these elections, electors can, vote for up to three candidates in the majority of wards – the exceptions being Darwin (single vote) and Biggin Hill, Crystal Palace, Mottingham and Shortlands (up to two candidates).
- 3.51 A large number of voters use all their vote entitlement for the same political party (known as ‘block votes’). These votes are more straightforward to count and record. However some electors don’t use all their vote entitlement, or, split their votes between political parties – these votes (known as ‘split votes’) need to be separately identified and counted/logged on to counting sheets, making the process much more complicated and time consuming. Details of

the votes cast at ward level are set out in **Appendix 2**.

- 3.52 The first result (Darwin ward) declared was at about 11.30am and the last result declared (Hayes & Coney Hall ward) was at 3.15pm. There were two close results (Bromley Town and Mottingham & Chislehurst North wards) where candidates and agents requested further scrutiny of the ballot papers but the initial results were accurate and results were declared.
- 3.53 Following the declaration of result of each ward, the successful candidates accepted their Office and were provided with induction information in a separate room set aside for this purpose (upstairs).

KEY FINDINGS AND EVALUATION REPORTS

a) The Returning Officer's Findings

- 3.54 The Returning Officer collected information from the following sources to help evaluate the impact of the pilot scheme on voters in Bromley and the administration of the elections:
- Extensive data was collected by polling station staff on the day
 - Feedback from all polling station staff on the training provided
 - A survey (through Survey Monkey) of all polling station staff (shortly after the elections) (this was independent of the Electoral Commissions polling station staff survey completed on the day)
 - Feedback from observers and other stakeholders on polling day
 - Online Feedback form on the Council website before/after the election
 - Local authority data such as the number of Absent votes and certificate of identities issued
- 3.55 Key Findings from this information are:
- Most voters in Bromley were aware of and able to produce required ID on 3 May 2018
 - 92% of voters produced one form of photographic ID
 - 8% of voters produced a combination of 2 non-photographic forms of ID
 - Most popular forms of photographic ID produced:
 - Driving Licence – 54%
 - Passport – 24%
 - Freedom Pass – 15%
 - Most popular forms of non photographic ID produced:
 - Poll Card – 3%
 - Credit/Debit card – 2%
 - 569 voters turned up at polling station with no ID or the wrong ID
 - 415 voters returned to the polling station with suitable ID
 - 154 voters did not return to the polling station with correct ID
 - A detailed breakdown of the above information (at both Borough and ward level) is shown in **Appendix 3**
 - No evidence that ID requirements significantly deterred electors from voting
 - No impact on turnout (40% in 2018, 41% in 2014)
 - No certificate of identities issued – probably due to the extensive list of photo graphic and non photographic forms of ID tested
 - No evidence that hard to reach groups were disenfranchised
 - No increase in levels of postal voting (instead of polling station voting)
 - Most polling station staff were happy with the training they received and confident in delivering the requirements of Voter ID

- Most polling station staff agreed that the majority of voters were aware of and produced the correct form of ID
- The checking of ID slowed the process down slightly in a few polling stations and in one or two instances queues formed – however these were effectively managed by polling staff and no significant concerns were raised.

b) The Electoral Commission’s Evaluation

3.56 The Electoral Commission published an overall report and individual evaluations on each of the specific pilot schemes in July 2018. The Director of Communications and Research at the Electoral Commission reported that:

‘93% of polling station voters in Bromley said that they were aware that they had to take identification with them to the polling station to vote. This is a testimony to the hard work put in by Bromley Council staff. From the experience of voters to the staff delivering the pilots, the broad picture is a positive one.....’

3.57 The reports can be found at the following links:

https://www.electoralcommission.org.uk/_data/assets/pdf_file/0006/244950/May-2018-voter-identification-pilots-evaluation-report.pdf and

https://www.electoralcommission.org.uk/_data/assets/pdf_file/0010/244954/Voter-identification-pilot-Bromley-evaluation.pdf

3.58 A copy of the Summary of key findings in regard to the Bromley Voter ID evaluation is attached in **Appendix 4**.

c) The Cabinet Office’s Evaluation

3.59 The Cabinet Office published their report ‘Electoral Integrity Project – Local Elections 2018 – Evaluation’ in July 2018. This can be found at the following link:

<https://www.gov.uk/government/publications/electoral-integrity-project-local-elections-2018-evaluation>

3.60 A copy of the Executive Summary is attached in **Appendix 5**.

CONCLUSION

3.61 The Local Council elections in Bromley were delivered successfully without any major problems, legal challenges or allegations of fraud. The Voter ID pilot worked well, and although the Returning Officer regrets that 154 voters who turned up without ID or the wrong ID didn’t return to vote, most people in Bromley were aware of, and comfortable with, providing ID to vote. The Returning Officer is pleased that this evaluation will be taken into account and used to shape how the final policy will look when it is introduced.

3.62 Cabinet Office are now inviting expressions of interest from local authorities where Local Government elections are scheduled for 2 May 2019 to run further pilots to get a deeper understanding of how Voter ID will work on a wider scale and what works best for the voter.

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

4.1 There are no implications arising from this report for vulnerable adults and children.

5. POLICY IMPLICATIONS

5.1 None arising from this report.

6. FINANCIAL IMPLICATIONS

6.1 The Local Council elections are fully funded from Bromley's revenue budget. £500k was set aside in the Central Contingency to meet this cost, however the final costs are expected to be around £550k.

6.2 The Cabinet Office will fund the additional costs of the Voter ID Pilot Scheme. These costs include the public awareness campaign, additional staffing, training of the polling station staff, and the additional costs in regard to the printing and postage of the poll cards. These costs are expected to be about £210k.

7. PERSONNEL IMPLICATIONS

7.1 Some Council employees were recruited by the Returning Officer to help with various duties regarding the conduct of these elections. However, a majority of staff were recruited from other sources. The Returning Officer has a statutory right under section 35(6) of the Representation of the People Act 1983 to require the Council to provide as many staff as required for election purposes.

8. LEGAL IMPLICATIONS

8.1 The Council is required to designate one of its officers as Returning Officer for Local Council Elections under the provision of section 35(1) of the Representation of the People Act 1983. The Returning Officer is personally responsible for the conduct of elections.

8.2 The rules and regulations for the conduct of Local Council Elections are primarily contained in the Representation of the People Acts 1983, 1985 and 2000, the Representation of the People (England and Wales) Regulations 2001, the Electoral Administration Act 2006, the Electoral Registration and Administration Act 2013 and the Local Government Act 1972 and 2000, and the Local Elections (Principal Areas)(England and Wales) Rules 2006

9. PROCUREMENT IMPLICATIONS

Not Applicable

Non-Applicable Sections:	
Background Documents: (Access via Contact Officer)	