

TOWER HAMLETS ELECTIONS 2015 -

LEGACY REPORT

A joint report of the Returning Officer for Tower Hamlets and the partner agencies involving in delivering and overseeing the elections

1. INTRODUCTION AND PURPOSE OF THE REPORT

1.1 Elections took place in Tower Hamlets during May and June 2015 as follows:-

7th May 2015: UK Parliamentary General Election, constituencies of Bethnal Green & Bow and Poplar & Limehouse.

11th June 2015: Tower Hamlets Mayoral election and Stepney Green Ward Council by-election.

1.2 The planning and delivery of the 7th May elections drew on a range of best practice, experience and lessons learnt at previous elections in the borough. A number of initiatives were developed jointly by the Returning Officer and the partner agencies involved in delivering the events to ensure a free and fair contest, efficient management of the elections and an orderly poll and count in each case.

1.3 In turn the planning work for the 11th June 2015 elections drew on further lessons learnt in the process of delivering the 7th May polls.

1.4 As a result of this work, the elections in Tower Hamlets in May and June 2015 were delivered successfully and without any challenge to the outcome. The arrangements in place at each of the elections, particularly in relation to the management of the polling stations and the count, have attracted positive feedback from a number of sources and favourable comparisons with previous electoral contests in the borough.

A legacy for Tower Hamlets

1.5 A new Chief Executive will take up post with Tower Hamlets Council in October 2015, who will become the Returning Officer and Electoral Registration Officer for the borough. The purpose of this report is to review each aspect of the delivery of the May and June 2015 elections and issues arising from the earlier Election Court judgement; and to record lessons, measures that were particularly successful and areas where further improvement is still required, in order to provide a legacy for future elections.

Recommendations for wider consideration

- 1.6 It is considered that many of the measures introduced in Tower Hamlets in recent years will be of interest also to those with responsibility for delivering elections elsewhere, particularly in areas which have experienced similar issues to those locally. This report therefore identifies a number of best practice recommendations of more general application, for the consideration of Returning Officers, Police forces and partner agencies across the UK.

The Electoral Fraud Review and the wider legislative framework

- 1.7 Finally, the review has identified a number of areas in which the Returning Officer and partner agencies consider that the current legislative framework governing elections could have impeded their efforts to ensure an efficient, free and fair election or to deal quickly with issues or allegations raised. The Law Commission is currently undertaking a review of electoral law. In addition the Rt. Hon Eric Pickles MP, in his capacity as UK Government Anti-Corruption Champion, is leading an Electoral Fraud Review and has issued a call for evidence in connection with that review with a deadline of 8th October 2015. This report therefore also makes recommendations for consideration of possible changes to the law in a number of areas and these will be submitted as evidence to that review.
- 1.8 A summary of all of the recommendations made, by category and in bullet point form, is set out at Appendix A.

Preparation of the report

- 1.9 This report has been prepared in discussion between the Returning Officer/Electoral Registration Officer and the partner agencies that were involved in delivering or overseeing the 2015 elections locally, including the Metropolitan Police (both Tower Hamlets Police and the Special Enquiry Team at Scotland Yard), the Electoral Commission, the DCLG Commissioners and their appointed representative Mr Barry Quirk.
- 1.10 The Returning Officer has also in the normal way consulted the Election Agents of candidates at the 2015 elections for their feedback on how the elections were conducted and responses received have been incorporated into this report.
- 1.11 The General Purposes Committee of Tower Hamlets Council has responsibility on behalf of the Council for certain functions in relation to electoral matters. The Committee received a presentation from the Returning Officer on 24th September 2015 and were invited to comment on the draft report.

2. CONTEXT AND BACKGROUND

- 2.1 For a number of years, elections in Tower Hamlets have presented challenges both in terms of logistics and ensuring integrity, arising from

allegations of fraud by candidates or their agents; and the conduct of campaigners during the campaign, at polling stations and at the count. Prior to 2014 cases of fraud had not been substantiated but the complaints and allegations were nevertheless damaging to the confidence that some electors, candidates and political parties had in the electoral process locally.

Elections 2012

- 2.2 Following the London Mayor and London Assembly elections in May 2012 and two Council ward by-elections in April and May of that year, the Electoral Commission published a report¹ which found that the Metropolitan Police Service (MPS) had recorded and investigated a total of 64 cases involving 154 separate allegations of electoral fraud in relation to the 2012 elections in Tower Hamlets.
- 2.3 In only three of those cases (involving five allegations) did the MPS find there was evidence to suggest that an offence may have been committed, and in each of those there was insufficient evidence to prove an offence or identify a suspect, so no further action was able to be taken.
- 2.4 The Electoral Commission report nevertheless highlighted some key issues relating to cases of alleged electoral fraud and made a number of recommendations to the Returning Officer/Electoral Registration Officer, the MPS and elected representatives, political parties, candidates and campaigners for actions to improve integrity and confidence for future elections in Tower Hamlets, particularly the need for some significant changes in the approach to reporting and investigating allegations in future.

Elections 2014

- 2.5 In response to these recommendations, the preparations for the combined European Parliamentary, Tower Hamlets Mayor and Council elections on 22nd May 2014 featured a much closer working partnership between the Returning Officer and the Metropolitan Police both locally and at Scotland Yard, and a range of initiatives were introduced to ensure the integrity of the electoral register and the elections; improve communications and build confidence. These measures included, and were summarised in, the Tower Hamlets Local Protocol that all parties and candidates standing in the elections were invited to sign.
- 2.6 In the event, the May 2014 combined elections in Tower Hamlets gave rise to a total of 164 allegations of electoral fraud and malpractice which were investigated by the Metropolitan Police Special Enquiry Team. 80% of these allegations were made by rival candidates or their agents. The majority of the remainder were received from members of the public in response to an appeal by the Returning Officer after the election for anyone who had witnessed problems at a polling station to come forward.

¹ 'Allegations of electoral fraud in Tower Hamlets in 2012 - Report on the outcome of investigations' (March 2013) – available at http://www.electoralcommission.org.uk/_data/assets/pdf_file/0019/154531/Tower-Hamlets-report-2013.pdf.

- 2.7 Following the Police investigations, two individuals were cautioned (one for Malicious Communication and one for Personation) and one further individual is awaiting trial for a candidate nomination offence.
- 2.8 The combined verification and count for the May 2014 elections was a protracted affair which attracted criticism and was the subject of a report by the Electoral Commission². The report recommended that the Returning Officer should take a number of actions including considering a wider range of potential count venues for future elections, including if necessary venues outside the borough.
- 2.9 The election of Mayor Lutfur Rahman on 22nd May 2014 was subsequently successfully challenged in the election court due to corrupt and illegal practices that were found to have been committed by the elected candidate and his agents. The petitioners named the Returning Officer as second respondent to the election petition but on the first day of the trial they withdrew all allegations of wrongdoing against the Returning Officer and his staff and in his judgement issued on 23rd April 2015, Richard Mawrey QC (presiding at the Election Court) exonerated the Returning Officer.
- 2.10 The election court judgement identified a number of specific cases of alleged false registration and other issues that have been followed up by the Returning Officer and have helped to develop the anti-fraud measures used in 2015. The MPS Special Enquiry Team (SET), which is the Single Point of Contact for elections and the electoral process within the MPS, and sits within the SCO1 Homicide and Major Crime Command, identified 5 offences from 2014 in the Election Court judgement not previously reported to police. In addition 47 offences that had previously been reported to police had the potential for fresh evidence to be considered, making a total of 52 offences to be reviewed/(re)investigated.

3. THE ELECTIONS IN TOWER HAMLETS IN MAY AND JUNE 2015

- 3.1 The UK Parliamentary General Election took place on 7th May 2015. In Tower Hamlets the constituencies of Bethnal Green & Bow and Poplar & Limehouse were contested.
- 3.2 As referred to above, on 23rd April 2015 a judgment of the Election Court avoided the Tower Hamlets Mayoral election of May 2014 and disqualified from office the former Mayor and a Councillor for Stepney Green Ward. As a result, a fresh Mayoral election and a ward by-election were held on 11th June 2015, just five weeks after the UK Parliamentary General Election.
- 3.3 Whilst the contingency planning work for the UK Parliamentary General Election took into account from the beginning the possibility that following the Election Court judgement there could be a need for a Mayoral election either

² ('Delays at the verification and count for the May 2014 elections in Tower Hamlets' (July 2014) – available at http://www.electoralcommission.org.uk/_data/assets/pdf_file/0008/169199/Our-report-on-elections-held-in-Tower-Hamlets-in-May-2014.pdf

combined on the same date or shortly before or after the UKPGE, the planning, management and implementation of two major elections in a five week period represented a major challenge for the Electoral Services team and all staff involved, and it is a tribute to those staff that the elections were delivered successfully and with significant improvements over the May 2014 polls in all areas.

Aims and objectives

- 3.4 The objectives of the Acting Returning Officer and the joint planning team for the May 2015 elections were:-
- To have in place all necessary measures to ensure that the election was delivered fully in accordance with the law;
 - To draw on lessons learned at the May 2014 and previous elections, on Electoral Commission recommendations and guidance, and on best practice elsewhere;
 - To ensure that the electoral register was as accurate as possible, that the election was free and fair and that every elector was able to cast his or her vote freely and without interference or intimidation;
 - To ensure that any allegations made during the election period were properly and efficiently investigated;
 - That the declared results of the elections truly reflected the will of the electors who voted; and
 - That those results were accepted by all concerned to be accurate and that there was no subsequent challenge or election petition.

The DCLG Commissioners

- 3.5 On 17th December 2014 the Secretary of State for Communities and Local Government issued Directions to Tower Hamlets Council to secure the authority's compliance with Part 1 of the Local Government Act 1999. The Directions provided that certain specified functions of the authority would be exercised until 31 March 2017 by Commissioners nominated by the Secretary of State. Amongst the specified functions were the functions under section 112 of the Local Government Act 1972 in relation to the appointment or dismissal of any person to the statutory offices of Electoral Registration Officer or Returning Officer for local elections (paragraph 4 of Annex B to the Directions).
- 3.6 The Commissioners did not exercise their power to make an appointment or dismissal but they monitored closely the work undertaken in preparation for the May 2015 elections and also appointed Mr Barry Quirk, Chief Executive of Lewisham Council, to provide management support and oversight to the Returning Officer in the planning and delivery of those elections. An Elections Best Value Action Plan, focussing primarily on the delivery of the elections in May and June 2015, was prepared by the Returning Officer and subject to regular reporting to the Commissioners as part of their wider monitoring work to ensure that the Council was meeting its Best Value duty.

Assessment of the May/June 2015 elections and lessons learnt

- 3.7 The management and implementation of the elections incorporated a number of significant improvements over previous practice in Tower Hamlets as set out below. Strengthened arrangements were put in place for the UK Parliamentary Elections on 7th May, particularly around ensuring good order at the polling stations, integrity of the electoral process and efficiency of the count. These arrangements were in turn maintained and further improved for the Mayoral election on 11th June.
- 3.8 At both elections positive feedback was received from candidates, agents and others on the improvements introduced and complaints to the Returning Officer and the Metropolitan Police were significantly reduced compared with 2012 or 2014. In relation to the 2015 elections, the MPS Special Enquiry Team received the following numbers of allegations of fraud and malpractice:-
- In connection with the UK Parliamentary General Election on 7th May - 10 allegations.
 - In connection with the Tower Hamlets Mayoral Election on 11th June – 48 allegations. Of these 35 were made by rival candidates or their agents, 15 by one individual.
- 3.9 None of the 2015 allegations have resulted in any criminal case disposal to date. The following paragraphs summarise some of the lessons learned and actions taken in relation to specific areas of the electoral process.

4. JOINT WORKING

- 4.1 The Returning Officer worked jointly with partner agencies to deliver the successful elections. A Joint Election Planning Group met fortnightly from January 2015 to plan the 7th May event, including representatives of all relevant Council services, the Metropolitan Police (Tower Hamlets and the SET), the Electoral Commission, DCLG Commissioners and Barry Quirk.
- 4.2 Risks, contingencies, milestones and key actions were updated regularly until election day. All pre-election milestones were completed and the Electoral Commission's requirements met. The Commission has subsequently commented favourably on the close liaison and planning between the Returning Officer and the Police.
- 4.3 Management expertise and capacity was enhanced through the procurement of an experienced external resource as consultant to oversee key aspects of the plans including staff training and co-ordination of the verification/count.
- 4.4 Following the UK Parliamentary General Election on 7th May, the planning arrangements were reviewed and a formal Silver Command Group established, chaired by Tower Hamlets Police 'Silver', to coordinate security planning for the Mayoral election on 11th June and support the Returning Officer in the planning and implementation process. A dedicated event

manager was identified for the count, who attended the Silver Command and other planning meetings.

Best Practice Recommendations to Returning Officers and Partner Agencies

Joint working – The Returning Officer should work closely with the local Police force and other partner agencies to plan for the delivery of the elections. Joint meetings should commence well in advance of the elections and should facilitate a shared project plan, priorities and intelligence. In the case of security or integrity concerns a formal Gold/Silver/Bronze command structure should be established across the partner agencies.

5. REGISTRATION

- 5.1 As is usual in the run up to an election, the Electoral Services Team were very busy in the weeks prior to 7th May and 11th June 2015. Over 10,000 alterations (deletions, additions and amendments) were made to the register in the two months prior to the deadlines. In addition hundreds of telephone queries were received and responded to, and all late applications were checked for additional supporting information to confirm identity.
- 5.2 The team coped well but on occasion backlogs of telephone enquiries developed which required return calls. The need to provide constant telephone cover for registration work meant that some election duties had to be undertaken outside office hours, leading to additional working time for staff. For the 11th June elections, eight additional council staff temporarily joined the team and were added to the 'hunt group' to answer enquiries from the public and deal with voicemail messages. This proved to be successful. The incoming Returning Officer should seek to agree with the Council's Corporate Management Team a similar arrangement at future elections, or negotiate an increased role for the Contact Centre in handling routine enquiries.
- 5.3 The online Individual Electoral Registration (IER) process presented some difficulties as a number of online applicants had received a reference code which they took to be confirmation of their registration, when in fact it was simply confirmation of receipt of their application. In some cases additional evidence was required and the resident was found not to be registered.
- 5.4 In other cases at the Parliamentary General Election, overseas electors contacted the office to say that they had not received their postal ballot papers – on investigation it transpired that they assumed they were awarded a postal vote at the time of requesting a form when registering online and were found not to have completed an application form or requested to vote by post. Late applications from overseas electors to register did not allow enough time to for the office process late postal vote applications and send the postal vote pack abroad. The electoral services team have subsequently sent postal vote applications to 646 overseas electors.

It is recommended that the incoming Returning Officer should consider undertaking additional and earlier communications activity at future elections to provide information to electors – including overseas electors on the process for applications for registration and postal votes; and the timescales for issue and return of postal vote – including a suggestion that overseas electors may wish to apply instead for a proxy vote where necessary.

- 5.5 Immediately prior to the UK Parliamentary General Election, media activity occurred in relation to a residential building that had been decanted for redevelopment but to which it was claimed postal voting packs had been sent. The number of packs was small and no evidence was found of any fraud, but one of the Election Agents has proposed that all Housing Providers should be under a duty to inform the Returning Officer of any empty or demolished buildings in their ownership.

Recommendations to UK Government

The information provided to electors seeking to register online under Individual Electoral Registration (IER) should be improved, in particular to explain that confirmation of receipt of their application does not mean they are registered and that further information may be required by the local authority before they are confirmed on the electoral register.

6. INTEGRITY MEASURES AND THE LEGAL FRAMEWORK

- 6.1 A range of measures were introduced by the Returning Officer/Electoral Registration Officer to ensure the integrity of the 2015 elections, including:-
- A special canvass involving personal visits by the Electoral Registration Officer's staff to all addresses where 6 or more electors were registered, to check the accuracy of the register. In total approximately 3,500 properties were visited during the special canvass.
 - Additional supporting information was required as proof of residency from all late applications to register
 - Confirmation letters with the current register entry was sent to all addresses
 - The Electoral Registration Officer reviewed fortnightly the list of postal votes being sent to any address other than that at which the elector is registered to vote. Any concerns to be investigated, including any address to which more than two postal votes were being redirected.
 - Written guidance (in English and Bengali, supplemented by illustrations), was included in postal packs to emphasise the secrecy of the ballot and the need to ensure that no other person is permitted to interfere in the voting process.

- Polling station staff were not permitted to advise electors or address each other or any other person in any language other than English inside the polling station.
- 6.2 The above measures were summarised in the Tower Hamlets Local Protocol which was updated in consultation with partners and interested parties and re-launched on 30th March 2015. A copy of the Local Protocol, 2015 is attached at Appendix B. As well as setting out the enhanced integrity measures around registration and the election, the Local Protocol proposed clear standards of conduct required of candidates, agents and campaigners, to complement the Electoral Commission's own revised Code of Conduct for 2015. All candidates and parties contesting the elections were invited to sign the protocol and undertake to observe these standards, which included:-
- Campaigners and canvassers not to collect completed postal or proxy application forms from electors for delivery to the Electoral Registration Officer (ERO).
 - Candidates and agents not to cause or allow to be published any material that misrepresents any person or includes derogatory statements about another candidate.
 - Candidates not to allow more than one campaigner per party or independent candidate to be present outside any entrance to the polling place at any one time.
- 6.3 The Returning Officer again provided a dedicated e-mail account and telephone hotline for any complaints of possible fraudulent activity. Any allegations submitted via this route were guaranteed a response within one working day, and if referral to the Police was required, the Police would contact the complainant within a further two working days.
- 6.4 The Electoral Commission lent its support to the Local Protocol. To ensure full understanding of the process, rules, standards of conduct expected and the Local Protocol, a total of four Candidates and Agents meetings were held. A Communications Plan was agreed with the Council's media team to ensure effective communication of key messages regarding the election and in particular security/integrity of the vote. Publicity was co-ordinated with partner agencies. In addition reactive work and social media monitoring continued through to election day and beyond.
- 6.5 The Local Protocol was a voluntary agreement and not all candidates or parties signed it. It did however still represent a useful statement of the standards of conduct expected and the commitment of the partner agencies to address the issues covered and to challenge some aspects of the culture locally in relation to electoral campaigning. The incoming Returning Officer is therefore invited to consider utilising a similar protocol at future elections.
- 6.6 From subsequent comments made by the Commissioners and noted by the Returning Officer, it is suggested that earlier and more extensive communications are required, particularly focussing on the integrity measures and targeted at specific hard-to-reach groups and communities.

- 6.7 It is suggested that the information should be presented in distinct phases, with the earliest phase publicising the timelines and various deadlines (registration, absent vote etc) leading up to the election. This would be followed by a second phase highlighting the practicalities of the voting process; and then a third focussing on integrity messages such as the secrecy of the process, postal and other votes to be completed without interference, the need for vigilance in the case of e.g. shared letter boxes.

Allegations and evidence

- 6.8 The Metropolitan Police Service (MPS) has advised that in both 2014 and 2015 there were instances of allegations being made against individuals by political rivals with no evidence to back them up. On occasion there is no named informant for the police to interview or the person named is unwilling to follow the matter up. As well as being a waste of police time such allegations can, if they receive publicity, unjustifiably damage public confidence in the electoral process. Even where specific information was provided, including in relation to some matters that were subsequently raised again in the Election Court, the Crown Prosecution Service found in many cases that the evidence presented did not meet the test to allow a prosecution.
- 6.9 Many allegations are the result of a misunderstanding of what is an offence. Whilst not being an offence, some actions may represent a breach of the Electoral Commission's Code of Conduct. Although it may not be appropriate or practicable for alleged breaches of the Code to be referred to the Commission or subject to any sanction, this can be a problem particularly where an independent candidate does not have a party machinery to which code violations can be referred. The Returning Officer should consider whether he could usefully publicise in his post-election report the number and type of allegations that were made of a breach of the Code.
- 6.10 Potentially instances of fraudulent registration can be brought to light as a result of an investigation of another matter, for example housing benefit or council tax fraud. Relevant information held by the local authority's Audit team and other investigatory functions should be routinely shared with the Returning Officer.

Individual Electoral Registration (IER)

- 6.11 The introduction of IER has without doubt increased the security and accuracy of the electoral register. The system requires each elector to register individually and to provide his/her date of birth and National Insurance Number (NINO) which are checked against Department of Work and Pensions records. However, IER relies on the security of the NINO in the first instance, and does not necessarily provide a firm link to a particular address. Further measures are required to improve the process, especially where an elector has more than one address

The nominations process

- 6.12 It can occur that there are doubts about the accuracy of information contained in a candidate's nomination papers. The Returning Officer's powers in this regard are very limited. The Electoral Commission has previously recommended that the Returning Officer should have express powers to reject a sham nomination, and that the law should set out the powers and duties of a Returning Officer for all elections. The Metropolitan Police Service have suggested that there could usefully be changes to the nomination form template to provide more detail and clarity – including guidance notes in layman's terms on what is required and the consequences of false information (e.g. using terms such as 'home' address, giving specifics of ineligibility criteria and asking the candidate to confirm that none apply to him/her).
- 6.13 One of the election agents at the 2015 Mayoral election has proposed that any documents (e.g. nomination registers, absent vote lists) provided to prospective candidates before the election should be returned after the poll or a fine imposed. Electronic information should be provided with a time-limited password.
- 6.14 The Returning Officer notes that the Electoral Commission has previously advised that the complexity of electoral law can produce obstacles & delays in the investigation of electoral offences; and recommended that this should be addressed, e.g. by dispensing with the division between corrupt and illegal practices, simplifying the offence of bribery and scrapping the separate offence of treating. There is also some ambiguity regarding the timing of electoral offences.
- 6.15 The Returning Officer endorses these points and would add that the relatively large number of allegations received of relatively minor breaches of the 'imprint' rules can have the effect of (i) inflating the number of allegations to be investigated and (ii) diverting resources from potentially more serious matters.

Best Practice Recommendations to Returning Officers and Partner Agencies

Returning Officers may wish to consider undertaking a special canvass of all addresses in their area where more than a certain number of electors are registered, to ensure the accuracy of the electoral register used at polling stations.

The list of 'away' addresses for postal votes should be reviewed on a regular basis to identify any address to which more than a certain number of postal packs are to be sent, and those addresses subject to additional checks.

Postal voting packs should include written guidance to emphasise the secrecy of the ballot and the need to ensure that no other person is permitted to interfere or influence the voting process.

Returning Officers and partner agencies may wish to consider adopting local codes, to supplement the Electoral Commission's Code of Conduct for Campaigners by addressing local issues such as (where relevant) Candidates and campaigners collecting completed postal or proxy application forms from electors; publishing negative campaign material about another candidate; or allowing crowds of campaigners to gather outside polling places.

Communication is crucial in order to build confidence in the electoral process and the anti-fraud measures – a dedicated e-mail and/or telephone 'hotline' for any allegations of fraud or malpractice, with a guaranteed response time, is helpful in this regard.

Agents and Candidates should be reminded of the provision of the Electoral Commission Code of Conduct which states that complainants making allegations of fraud should be prepared to provide evidence and give the police a statement on the matter.

The Returning Officer should carry out basic checks of the information provided before passing an allegation to the Police, in case the matter is simply an administrative error. The Local Authority has ready access to data sets that may indicate if an offence has been committed.

Information about investigations being undertaken by the local authority's Audit team and other investigatory functions that could have relevance to the accuracy of the electoral register should be routinely shared with the Returning Officer.

Recommendations to UK Government

Consideration should be given to the Electoral Commission's recommendation that the complexity of electoral law should be addressed, e.g. by dispensing with the division between corrupt and illegal practices, simplifying the offence of bribery and scrapping the separate offence of treating.

The law should set out the powers and duties of a Returning Officer for all elections.

Returning Officers should have express powers to reject a sham nomination.

The recommended nomination form templates should be reviewed to provide more detail and clarity for candidates including guidance notes in layman's terms on what is required and the consequences of false information (e.g. using terms such as 'home' address, giving specifics of ineligibility criteria and asking the candidate to confirm that none apply to him/her).

Consideration should be given to requiring that any documents (e.g. nomination registers, absent vote lists) that are provided to prospective candidates before the election are returned after the poll or a fine imposed. Electronic information should be provided with a time-limited password.

The IER checking process should be strengthened to provide a firmer link between the individual and the registration address(es). Returning Officers should also be provided with additional information and training on the documents that may be provided in support of an application to register, e.g. European nations' identity documents.

7. POSTAL VOTING

- 7.1 Over 26,500 postal votes were issued for the Parliamentary election, of which approximately 70% were returned. The figures for the Mayoral election, for which a different franchise applies, were c. 28,500 and 60% respectively. Discussions were held with the Royal Mail regarding measures to ensure security of delivery. All postal vote statements were scanned and verified at Postal Vote Opening Sessions run by a dedicated Deputy Acting Returning Officer (DARO). All staff involved in adjudication of personal identifiers were trained on Electoral Commission forensic handwriting guidance. Procedures and staff instructions were reviewed and agents advised that no 'tallying' was permitted.
- 7.2 Between the two elections, the Returning Officer and Deputy Returning Officer reviewed the process and the criteria for adjudication of personal Identifiers to ensure full compliance with Electoral Commission guidance. The notification letters to postal voters whose Personal Identifiers were rejected at the Parliamentary General Election were despatched in time for them to refresh their details prior to the 11th June.
- 7.3 The postal vote operation was a very efficient process including the final two opening sessions which were held at the count venue on each of the election days. The incoming Returning Office is recommended to retain the arrangements made to process postal votes in 2015 and to consider a further possible improvement of splitting each of the postal vote opening sessions into two distinct parts – (i) opening and checking; and (ii) opening the ballot paper envelopes – in order to minimise down time for staff.
- 7.4 The rejection rate for personal identifiers (mostly signature mismatch) at the May Parliamentary General Election was c.8% and at the June Mayoral Election c. 7%. This is slightly lower than at previous elections in Tower Hamlets but still higher than the national average. It is recommended that discussion be held with neighbouring boroughs' Returning Officers to confirm consistency of practice in adjudicating signatures and that the forensic handwriting guidance to D(A)ROs should be supplemented by attendance at a suitable training course. Communications activity should also be undertaken to improve information to electors on the process for verifying personal identifiers – including the need to use their customary signature regardless of language.

Best Practice Recommendations to Returning Officers and Partner Agencies

In order to avoid unnecessary rejection of genuine postal votes, publicity should be undertaken to tell electors to use their normal signature on all forms relating to the election, whether or not this is in English script.

Recommendations to UK Government

The Returning Officer and the Metropolitan Police Service Special Enquiry Team would support a review of the law around postal and proxy voting. In particular there is support for proposals consulted on by the Law Commission regarding an offence of handling another person's completed postal vote application.

8. POLLING STATIONS

- 8.1 111 polling stations were used, in a total of 76 polling places at each election. Double polling stations utilised a single ballot box to simplify the process for electors and to expedite the delivery and verification processes.
- 8.2 Polling stations were all visited and surveyed in advance of polling day by the Returning Officer's staff and Police officers and plans made for access and egress routes, layout and areas to be kept clear at the entrances, which were then marked out by hazard tape on the day.
- 8.3 Presiding Officers and police on duty were trained jointly in advance to ensure better communication and a common understanding of the rules, roles and responsibilities. This was a very successful initiative which addressed criticism at the 2014 elections that staff had failed to intervene when confronted with unacceptable behaviour due to a lack of clarity about their role; and provided a useful briefing for the police officers on a specialist area of law that is not covered in existing syllabuses. Police officers were thus better equipped not to panic if an allegation came to them and could check with the presiding officer in the first instance whether, for example, the matter had arisen from an administrative error.
- 8.4 Polling Places were ranked Red, Amber or Green according to a risk assessment and Tower Hamlets Police provided cover for all polling stations throughout the day with locally based officers (2 x police officers on 'Red' assessed stations, including in some cases a body-cam equipped officer, 1 x officer on others, a PCSO on some 'Green' stations). In a further improvement over 2014, all police officers on duty were required to complete a quality-assured duty statement before being released, to ensure evidence was available if subsequently required.
- 8.5 A joint Returning Officer/Police bid to Cabinet Office funds available to 17 high risk authorities to address integrity resulted in funds for enhanced electoral

registration activity and extended police hours on the Parliamentary General Election polling day. The local authority and the Metropolitan Police Service both applied significant resources to the 2015 elections and all of the agencies involved in funding the activities described in this report should be commended for the priority that they accorded the work.

- 8.6 All polling station staff were required to confirm that they are not affiliated to any political party or candidate and all staff were appointed to work at a polling station outside their home constituency and where they had not previously worked. This was designed to avoid accusations that had occurred previously of overfamiliarity between staff and certain candidates or agents. The Returning Officer also instructed that staff speak only English in the polling station and count. This provision was included in staff instructions and training.
- 8.7 After the Parliamentary General Election and before the Mayoral by-election, the Returning Officer and Police colleagues reviewed the arrangements in place at polling stations with a view to making further improvements e.g. to the extent of the marked-out areas. Three presiding officers whose performance had been inadequate were replaced and two new polling places were identified to replace venues that were unavailable on 11th June. A briefing was prepared for presiding officers to highlight issues that had arisen on 7th May and the differences in the 11th June poll including the ballot paper/Supplementary Vote system. Presiding officers were given photographs of the area to mark outside the polling place and the process was explained when they collected their ballot box and sundry equipment the day before the poll.
- 8.8 There was significantly positive feedback from the public, candidates and agents on both the organisation of the polling stations and the policing operation. In comparison with 2014, very few complaints were received about conduct at the polling stations. The incoming Returning Officer is recommended to consider repeating the measures taken at future elections within available resources. This is likely to require a more stringent prioritisation of polling places to target more limited available resources, including police staff, on the highest risk sites according to a rigorous risk assessment and ranking of polling places. In relation to the marked restricted areas outside polling places, the Returning Officer should consider the best way of marking these out, and the provision of an area for Tellers, in the case of inclement weather.

Personation allegations

- 8.9 Five allegations of potential personation were received in total after the two election days which were passed to the Police for investigation. In this regard the MPS Special Enquiry Team has advised that in some cases the presiding officer did not complete the personation statement and records provided little evidence for investigation. There was no CCTV at most polling stations. The Returning officer will wish to address these points for future elections. It may be useful for Presiding Officers to annotate the corresponding number list

periodically (e.g. hourly) to provide an approximate time point for the issue of each ballot paper in the case of any subsequent query.

- 8.10 Each of the agencies involved in delivering the elections has made the point that requiring electors to produce some proof of identity at the polling station would substantially address the risk of personation, and this is recommended to the UK Government for consideration.
- 8.11 A small number of misprinted ballot papers were discovered at the UK Parliamentary General Election count, together with 7 x tendered papers from 3 x stations and a number of postal ballots in their envelopes. The Returning Officer is recommended at future elections to emphasise at the Presiding Officer training:-
- In the event of misprinted ballots – do not issue and alert the Returning Officer
 - Reminder of procedure for tendered papers
 - Postal ballots only in dedicated receptacle.

Best Practice Recommendations to Returning Officers and Partner Agencies

Returning Officers should consider whether any of the initiatives successfully introduced in Tower Hamlets in 2015 would be beneficial in relation to some or all of their own polling stations, including joint training of presiding officers and the police officers who would be on duty at their polling stations; clear marking of access and egress routes including ‘hatching’ of any areas to be kept clear in order to avoid obstruction of voters; and improved record keeping by presiding officers of the timing of each ballot paper being issued, to assist with any subsequent investigation of personation.

Utilising a single ballot box at each polling place, including those where the register is divided between two polling stations, can simplify and speed up the delivery and verification processes.

Recommendations to UK Government

A requirement for electors to produce proof of identity at the polling station before being issued with a ballot paper would improve the security of the process and substantially reduce the risk of personation. Such a requirement is recommended for serious consideration.

9. VERIFICATION AND COUNT

- 9.1 The verification and count for both the 7th May and 11th June elections took place at the ExCeL Centre, London. The venue was chosen at a time when

there was a possibility of the elections being combined and due to its capacity/size and facilities to ensure security and crowd management as well as a more efficient count.

- 9.2 A range of improvements were introduced to the layout and count procedures including double-width counting tables; Tensa barriers to mark out areas reserved for authorised agents and candidates; external security staff on the reception desk; security wristbands rather than lanyards for all attendees; and a requirement for photographic proof of identity.
- 9.3 The counting procedures were streamlined by measures such as using a single ballot box at double stations and count supervisors initiating recounts without referral to the accountants. The Deputy (Acting) Returning Officers, senior count supervisors and other key staff were equipped with radio microphones to ensure efficient communications.
- 9.4 All attendees were required to sign a code of conduct as a condition of entry. CCTV was operational in the venue. Consultation was undertaken in advance on the count arrangements and Agents and Candidates briefings were used prior to election day to explain to interested parties the arrangements for the count and the standards of conduct required.
- 9.5 A full review of count procedures and paperwork was conducted and instructions to count staff redrafted. Count training was enhanced including a 'dress rehearsal' in situ approximately three hours before the start, and a higher ratio of count supervisors to assistants ensured more efficient management of the process. No writing implements were provided to the counting assistants and all necessary count documentation was completed by the supervisors. Count staff were not permitted to communicate in any language other than English within the count venue.
- 9.6 Overall, the Parliamentary General Election count went well and was an efficient and especially well-ordered event relative to previous counts in the borough. The venue was spacious and provided a more orderly context than previous venues. The new arrangements described above worked well. The declaration times of 4.55 a.m. (Poplar & Limehouse) and 5.25 a.m. (Bethnal Green & Bow) were close to those estimated and significantly earlier than at previous elections.

Further improvements from 7th May to 11th June

- 9.7 However, the Acting Returning Officer and observers identified a number of aspects of the count that could be improved for the 11th June event, which in the Tower Hamlets political context was likely to prove more challenging. These included:-
 - enhanced security measures and a new approach to security of the event to ensure resilience;

- changes to the layout of the room which because of its size made it difficult for management/the Acting Returning Officer to see, and be seen from, all parts of the count at once; and
- measures to further speed up the count. Specifically the Acting Returning Officer identified three main sections of the count where time was lost and improvements were possible:- (i) the final postal vote opening session (up to 2,000 postal votes were received on the final day, including more than 1,000 handed in at the polling stations or collected by the Royal Mail sweep and arriving at the count after 10.00 p.m.); (ii) Queues at the ballot box receipt point; and (iii) reducing the number of doubtful papers set aside for final adjudication by the Acting Returning Officer.

- 9.8 Supervisors were asked to provide feedback on the performance of their team members and some staff identified who were not used on 11th June.
- 9.9 Overall, although there were additional management resources in place and additional planning activity, it was still the case that too much of the detailed management was handled by the Acting Returning Officer and in particular the Deputy ARO.

The Mayoral and Stepney Green by-election counts, 11th June 2015

- 9.10 Pursuant to the above, a formal Silver Command Group was established, chaired by the Tower Hamlets Police 'Silver' to take forward the security planning for 11th June and support the Returning Officer in the planning and implementation of the event. A statement of expectation was agreed to clarify roles and a Dedicated Event Manager was identified in consultation with LBTH Facilities Management – to take overall responsibility for the logistics of the external planning of the event and work to the Returning Officer as client for the count planning work and venue/police liaison for the Mayoral election.
- 9.11 In consultation with the Returning Officer and Police, the Venue management provided additional facilities for the 11th June count including:-
- No public access to the entire venue from 8.00 p.m. and a sterile area around count hall.
 - Additional security staff and larger desks, revised arrangements for wristbands, separate entrances for staff and others, queueing barriers as required.
 - Restricted entry point to the count hall only and separate security entrance to the Postal Vote opening.
 - Bag searches
 - No alcohol on sale at catering outlets
- 9.12 Improved instructions and directions were issued to presiding officers regarding the delivery of ballot boxes and they were encouraged to undertake a dry run of the route in advance. A dedicated manager was identified in advance to plan and take control of the delivery and receipt process, including more staff/runners at access points to direct presiding officers and take boxes to holding area and avoid delays.

- 9.13 The Returning Officer made changes to the layout of the count venue in response to the issues identified at 9.7 above. A smaller total area was used compared to 7th May (6,000 sq mtrs compared to 9,000) with a single large horseshoe layout for the Mayoral contest and a separate secure area for the ward by-election. 120 count assistants worked in teams of 6 for the verification and count. Additional staff were provided for the final postal vote opening session.
- 9.14 Staff were allocated seats at the count and were not permitted to sit with their friends.
- 9.15 The Returning Officer implemented a number of efficiency measures to limit downtime for staff including commencing the 'count' stage of the Mayoral count before the 'verification' statement had been completed, and with the agreement of candidates starting to sort the second preference votes for the two leading candidates in advance of the announcement of the detailed first preference votes.
- 9.16 Doubtful ballot papers rejected at Deputy Returning Officer adjudication were stamped rejected at the count table and removed from the final Returning Officer adjudication.
- 9.17 The measures described were successful and the incoming Returning Officer is recommended to incorporate the learning points above into the planning for future counts. The declaration time for the Mayoral election (4.30 a.m.) was exactly as estimated and significantly earlier than at previous elections.
- 9.18 However further improvements are possible. For example the layout of the count venue could be further improved by moving the postal vote opening session closer to the ballot box delivery point. An even more flexible approach to the sharing of work between count teams would further reduce down time for count staff. More importantly, the Electoral Commission has identified that the unused and spoilt ballot papers were not verified prior to the count for the 11th June election and the Returning Officer will need to ensure that this is addressed at future elections.
- 9.19 In the event, as a result of the timing of the Election Court judgement, the UK Parliamentary General Election and the Mayoral election were not combined in Tower Hamlets. If they had been combined on the same day, drawing on the experience of the 2014 combined elections, the (Acting) Returning Officer would have proposed a two-stage count event, with the combined verification and the counting of the UK Parliamentary General Election papers taking place overnight, with a brief interval before commencing the Mayoral election count with a fresh team of staff the following day. The incoming Returning Officer is recommended to consider such an approach in the case of future combined elections.

Best Practice Recommendations to Returning Officers and Partner Agencies

Returning Officers should consider whether some or all of the initiatives successfully introduced at the Tower Hamlets counts in 2015 would be beneficial in relation to their own elections. Measures that were particularly successful in the Tower Hamlets context included the revised layout of the venue, increased ratio of count supervisors to counting assistants, a flexible application of the procedures and allocation of work to teams to minimise down time, radio communications between senior staff and staff sitting in pre-allocated places both for the training run-through and the count itself.

In relation to security of the event, successful measures included a dedicated events manager/logistics lead; use of non-transferable security wristbands, proof of identity and a signed Code of Conduct as a condition of entry.

10. CHALLENGING ELECTION RESULTS

- 10.1 In the light of experience of the Election Petition and subsequent court judgement in connection with the 2014 Tower Hamlets Mayoral Election, the Returning Officer and partner agencies have a number of recommendations for review of the process for challenging election results.
- 10.2 The Statutory Timetable including the late registration deadline presents a serious challenge in relation to the investigation and resolution of complaints pre-election; and there are a number of factors that work against the swift investigation and prosecution of offenders.
- 10.3 The Electoral Commission has previously recommended that challenges should be simpler, more modern and follow less formal rules of procedure; that Returning Officers should have powers to bring petitions; and that the issue of a public interest petitioner should be investigated.
- 10.4 The Metropolitan Police Service Special Enquiry Team has told this review that they would favour a complete review of the election petition process, potentially bringing the process to a criminal standard of proof and reducing the costs to petitioners which can currently be prohibitive.

Recommendations to UK Government

The arrangements for challenging an election result should be reviewed, taking into account the points raised above by the Electoral Commission and the MPS Special Enquiry Team.

Any new arrangements and/or adjustments to the statutory election timetable should adequately allow for complaints to be investigated prior to the poll or in good time afterwards; and any fraud to be remedied in a timely fashion after the result of the election is declared. In this regard consideration could be given to building in a

longer period between the declaration of the result and the elected candidate(s) taking office.

11. CONCLUDING REMARKS

- 11.1 The elections on 7th May 2015 and 11th June 2015 in Tower Hamlets were delivered successfully. The counts for each of the elections were orderly and more efficient than at previous elections in the borough.
- 11.2 Far fewer complaints were received than in May 2014 and no doubt has been cast on the declared results nor any election petition challenge mounted.
- 11.3 The Returning Officer for Tower Hamlets was part of the sample of Returning Officers whose performance was monitored by the Electoral Commission in respect of the May 2015 polls. A series of monitoring returns were submitted. The Commission has confirmed (by letter on 25th June 2015) that further to a review of their proposed assessments by a panel of members of the UK Electoral Advisory Board and senior members of the Electoral Administration Team at the Commission, the Returning Officer has been assessed as having met the required standards.
- 11.4 The measures and learning points outlined in this paper should inform any future elections in Tower Hamlets in order to further build on the successes of 2015 and address any remaining areas for improvement. The challenge will be to repeat this within the resources likely to be available, particularly in respect of the policing operation at the polling stations and the identification of a suitable count venue. The Returning Officer would however point out that effective anti-fraud measures and sensible precautions inevitably give rise to certain costs and this must be recognised by the respective agencies responsible for providing a future Returning Officer/Electoral Registration Officer with the appropriate resources. The successful initiatives implemented in 2015 by the 17 'higher risk' authorities eligible for the additional Cabinet Office funding demonstrate why such a programme is required.
- 11.5 All action points identified should be incorporated into project planning for the May 2016 Greater London Authority and subsequent elections. It is important that a project management and risk assessment approach is once again utilised, with ownership of all actions assigned and time-bound. A post-election review, in consultation with agents, candidates and other interested parties, will be undertaken in each case to identify further improvements.

SUMMARY OF FINDINGS AND RECOMMENDATIONS

1. TOWER HAMLETS-SPECIFIC ISSUES AND SOLUTIONS: CHECKLIST OF RECOMMENDATIONS TO THE INCOMING RETURNING OFFICER**Joint Working**

- Maintain close liaison and advance planning work with the MPS and partner agencies as described in section 4 of the report.
- All action points identified should be incorporated into project planning for the May 2016 Greater London Authority and subsequent elections. A project management and risk assessment approach should again be utilised, with ownership of all actions assigned and time-bound.
- Undertake a post-election review, in consultation with agents, candidates and other interested parties to identify further improvements.

Registration

- Agree with the Corporate Management Team to provide additional council staff to temporarily join the Electoral Services Team in the run up to each election, or negotiate an increased role for the Contact Centre in handling routine enquiries, in order to increase telephone capacity.
- Consider undertaking additional and earlier communications activity to provide information to electors – including overseas electors on the process for applications for registration and postal votes; and the timescales for issue and return of postal votes – including a suggestion that overseas electors may wish to apply instead for a proxy vote where necessary.

Integrity Measures and the Legal Framework

- Consider again utilising a Local Protocol, building on that in place in 2014 and 2015, at future elections.
- Maintain the measures described in section 6 of the report, including the special canvass 6+ elector check; confirmation of residency letters; proof of residency for late applications; regular review of the 'away addresses' postal vote list; written guidance to electors on the integrity of the poll; polling station and count staff to speak only English whilst on duty.
- Provision of a dedicated e-mail account and telephone hotline for any complaints of possible fraudulent activity, with guaranteed response times.
- Early briefings for Candidates and Agents to explain the procedures and establish standards of conduct required.
- Earlier and more extensive communications activity, particularly focussing on the integrity measures and targeted at specific hard-to-reach groups and communities – information phased as suggested at section 6.7
- Draw the attention of agents and candidates to the provisions of the Electoral Commission's Code of Conduct and in particular that persons making allegations

should be prepared to make a statement to the Police; and consider publishing in his post-election report the number and type of allegations that were made of a breach of the Code.

- Make arrangements with the local authority's Audit team and other investigatory functions to ensure that relevant information arising from investigations should be routinely shared with the Returning Officer.

Postal Voting

- Enhance the successful arrangements in place for the opening of postal votes in 2015 as described in section 7 of the report.
- Discuss the rejection rate for postal voters' personal identifiers with neighbouring boroughs' Returning Officers to confirm consistency of practice; and supplement the forensic handwriting guidance to D(A)ROs with attendance at a suitable training course.
- Undertake communications activity to improve information to electors on the process for verifying personal identifiers – including the need to use their normal signature regardless of language or script used.

Polling Stations

- In planning for future elections, consider repeating the measures taken in 2015 at future elections, including using a single ballot box at double stations to simplify the delivery and verification processes; advance survey of polling stations and clear hatching of entry and exit areas to be kept clear (subject to further consideration of the best method for marking these out, and the provision of a marked area for Tellers, in the case of inclement weather); joint training of presiding officers and police who will be on duty at the polling stations; polling station staff to confirm that they are not affiliated to any political party or candidate; and staff appointed to work at a polling station outside their home constituency and where they have not previously worked.
- In relation to police attendance at polling stations, to undertake a more stringent risk assessment and prioritisation of polling places to target more limited available resources on the highest risk sites.
- Presiding officer training to emphasise additional points including the need to complete the personation statement in all relevant cases; if misprinted ballots are found these should not be issued and the Returning Officer should be alerted; a reminder of the procedure for tendered papers; and that any postal votes handed in at the station should be placed only in the dedicated receptacle.
- Consider the provision of CCTV at some polling stations, and possible requirement for presiding officers to annotate the corresponding number list periodically (e.g. hourly) to provide an approximate time point for the issue of each ballot paper in the case of any subsequent query.

Verification and Count

- In planning for future elections, consider the efficiency and security measures introduced for the 2015 count as described in detail at section 9 of the report and including:- selection of a venue of sufficient capacity to enable an orderly and

efficient verification and count for the election in question whilst still being a manageable size for the Returning Officer and his deputies; double-width counting tables; Tensa barriers to mark out areas reserved for authorised agents and candidates; external security staff on the reception desk; security wristbands rather than lanyards for all attendees; and a requirement for photographic proof of identity and a signed Code of Conduct as a condition of entry.

- Senior count and facilities staff to again be equipped with radio microphones to ensure efficient communications. Maintain the higher ratio of count supervisors to assistants and repeat the full run through of the count procedures with staff in place prior to the start of the event. No writing implements to be provided to the counting assistants. Count staff to be pre-allocated seating at the event.
- A dedicated Event Manager to be identified to take overall responsibility for the logistics of the event and work to the Returning Officer as client for the count planning work and venue/police liaison for the Mayoral election.
- Layout of the event to be reviewed and the postal vote opening session to be close to the ballot box delivery point.
- Further review of the count procedures including adjudication of doubtful papers and a more flexible approach to the sharing of work between count teams in order to further reduce down time for count staff.
- Unused and spoilt ballot papers to be verified prior to the count in accordance with legal requirements.
- In the event of combined elections in future , that consideration be given to a two-stage approach, with the combined verification and the counting of the primary election taking place overnight, followed by a brief interval before commencing the count for the other election(s) with a fresh team of staff.

2. SUMMARY OF BEST PRACTICE RECOMMENDATIONS TO RETURNING OFFICERS AND PARTNER AGENCIES

Joint Working

- The Returning Officer should work closely with the local Police force and other partner agencies to plan for the delivery of the elections. Joint meetings should commence well in advance of the elections and should facilitate a shared project plan, priorities and intelligence. In the case of security or integrity concerns a formal Gold/Silver/Bronze command structure should be established across the partner agencies.

Integrity Measures

- Returning Officers may wish to consider undertaking a special canvass of all addresses in their area where more than a certain number of electors are registered, to ensure the accuracy of the electoral register used at polling stations.
- The list of 'away' addresses for postal votes should be reviewed on a regular basis to identify any address to which more than a certain number of postal packs are to be sent, and those addresses subject to additional checks.
- Postal voting packs should include written guidance to emphasise the secrecy of the ballot and the need to ensure that no other person is permitted to interfere or influence the voting process.
- Returning Officers and partner agencies may wish to consider adopting local codes, to supplement the Electoral Commission's Code of Conduct for Campaigners by addressing local issues such as (where relevant) Candidates and campaigners collecting completed postal or proxy application forms from electors; publishing negative campaign material about another candidate; or allowing crowds of campaigners to gather outside polling places.
- Communication is crucial in order to build confidence in the electoral process and the anti-fraud measures – a dedicated e-mail and/or telephone 'hotline' for any allegations of fraud or malpractice, with a guaranteed response time, is helpful in this regard.
- Agents and Candidates should be reminded of the provision of the Electoral Commission Code of Conduct which states that complainants making allegations of fraud should be prepared to provide evidence and give the police a statement on the matter.
- The Returning Officer should carry out basic checks of the information provided before passing an allegation to the Police, in case the matter is simply an administrative error. The Local Authority has ready access to data sets that may indicate if an offence has been committed.

- Information about investigations being undertaken by the local authority's Audit team and other investigatory functions that could have relevance to the accuracy of the electoral register should be routinely shared with the Returning Officer.

Postal Voting

- In order to avoid unnecessary rejection of genuine postal votes, publicity should be undertaken to tell electors to use their normal signature on all forms relating to the election, whether or not this is in English script.

Polling Stations

- Returning Officers should consider whether any of the initiatives successfully introduced in Tower Hamlets in 2015 would be beneficial in relation to some or all of their own polling stations, including joint training of presiding officers and the police officers who would be on duty at their polling stations; clear marking of access and egress routes including 'hatching' of any areas to be kept clear in order to avoid obstruction of voters; and improved record keeping by presiding officers of the timing of each ballot paper being issued, to assist with any subsequent investigation of personation.
- Utilising a single ballot box at each polling place, including those where the register is divided between two polling stations, can simplify and speed up the delivery and verification processes.

Verification and Count

- Returning Officers should consider whether some or all of the initiatives successfully introduced at the Tower Hamlets counts in 2015 would be beneficial in relation to their own elections. Measures that were particularly successful in the Tower Hamlets context included the revised layout of the venue, increased ratio of count supervisors to counting assistants, a flexible application of the procedures and allocation of work to teams to minimise down time, radio communications between senior staff and staff sitting in pre-allocated places both for the training run-through and the count itself.
- In relation to security of the event, successful measures included a dedicated events manager/logistics lead; use of non-transferable security wristbands, proof of identity and a signed Code of Conduct as a condition of entry.

3. SUMMARY OF RECOMMENDATIONS TO UK GOVERNMENT

Registration

- The information provided to electors seeking to register online under Individual Electoral Registration (IER) should be improved, in particular to explain that confirmation of receipt of their application does not mean they are registered and that further information may be required by the local authority before they are confirmed on the electoral register.

Integrity Measures and the Legal Framework

- Consideration should be given to the Electoral Commission's recommendation that the complexity of electoral law should be addressed, e.g. by dispensing with the division between corrupt and illegal practices, simplifying the offence of bribery and scrapping the separate offence of treating.
- The law should set out the powers and duties of a Returning Officer for all elections.
- Returning Officers should have express powers to reject a sham nomination.
- The recommended nomination form templates should be reviewed to provide more detail and clarity for candidates including guidance notes in layman's terms on what is required and the consequences of false information (e.g. using terms such as 'home' address, giving specifics of ineligibility criteria and asking the candidate to confirm that none apply to him/her).
- Consideration should be given to requiring that any documents (e.g. nomination registers, absent vote lists) that are provided to prospective candidates before the election are returned after the poll or a fine imposed. Electronic information should be provided with a time-limited password.
- The IER checking process should be strengthened to provide a firmer link between the individual and the registration address(es). Returning Officers should also be provided with additional information and training on the documents that may be provided in support of an application to register, e.g. European nations' identity documents.

Postal Voting

- The Returning Officer and the Metropolitan Police Service Special Enquiry Team would support a review of the law around postal and proxy voting. In particular there is support for proposals consulted on by the Law Commission regarding an offence of handling another person's completed postal vote application.

Polling Stations

- A requirement for electors to produce proof of identity at the polling station

before being issued with a ballot paper would improve the security of the process and substantially reduce the risk of personation. Such a requirement is recommended for serious consideration.

Challenging Election Results

- The arrangements for challenging an election result should be reviewed, taking into account the points raised by the Electoral Commission that challenges should be simpler, more modern and follow less formal rules of procedure, that Returning Officers should have powers to bring petitions, and that the issue of a public interest petitioner should be investigated; and by the Metropolitan Police Service Special Enquiry Team regarding a complete review of the election petition process, potentially bringing the process to a criminal standard of proof and reducing the costs to petitioners which can currently be prohibitive.
- Any new arrangements and/or adjustments to the statutory election timetable should adequately allow for complaints to be investigated prior to the poll or in good time afterwards; and any fraud to be remedied in a timely fashion after the result of the election is declared. In this regard consideration could be given to building in a longer period between the declaration of the result and the elected candidate(s) taking office.