CITY OF WOLVERHAMPTON COUNCIL

Ethics and Governance **Committee**

6 July 2023

Public Meeting? Type of meeting Time 2.00 pm Yes Advisory

group

Committee Room 3 - 3rd Floor - Civic Centre Venue

Membership

Chair Cllr Rita Potter (Lab) Cllr Jacqui Coogan (Lab) Vice Chair

Labour Conservative

Cllr Milkinderpal Jaspal **Cllr Lovinyer Daley** Cllr Zee Russell **Cllr Rohit Mistry** Cllr Anwen Muston Cllr Susan Roberts MBE

Cllr Wendy Thompson Cllr Jonathan Crofts

Quorum for this meeting is three Councillors.

Information for the Public

If you have any queries about this meeting, please contact the Democratic Services team:

Contact Donna Cope

Tel/Email 01902 554452 or Email: donna.cope@wolverhampton.gov.uk Democratic Services, Civic Centre, 1st floor, St Peter's Square, Address

Wolverhampton WV1 1RL

Copies of other agendas and reports are available from:

Website http://wolverhampton.moderngov.co.uk/ democratic.services@wolverhampton.gov.uk **Email**

Tel 01902 550320

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Some items are discussed in private because of their confidential or commercial nature. These reports are not available to the public.

Agenda

Part 1 – items open to the press and public

Item No.	Title
1	Apologies for absence
2	Declarations of interest
3	Minutes of the previous meeting (Pages 3 - 8) [To approve the minutes of the previous meeting held on 16 March 2023 as a correct record].
4	Matters arising [To discuss any matters arising from the minutes of the previous meeting].
5	Changes to the Constitution (To Follow) [To consider the amendments to the Constitution – Report to follow].
6	Conferring the Title of Honorary Alderman (Pages 9 - 12) [To consider conferring the title of Honorary Alderman].
7	Update on the 2023 Annual Canvass (Pages 13 - 18) [To note the timetable for the 2023 annual canvass and provide feedback].
8	Evaluation of May 2023 Elections (Pages 19 - 40) [To provide feedback on the May 2023 local elections].

CITY OF WOLVERHAMPTON C O U N C I L

Governance and Ethics No: 3 Committee

Minutes - 16 March 2023

Attendance

Members of the Governance and Ethics Committee

Cllr John Reynolds (Chair)

Cllr Jonathan Crofts (Vice-Chair)

Cllr Celia Hibbert

Cllr Dr Paul John Birch J.P.

Cllr Louise Miles

Cllr Phil Page

Cllr Milkinderpal Jaspal

Cllr Rita Potter

Cllr Simon Bennett

Cllr Wendy Thompson

Employees

David Pattison Chief Operating Officer
Laura Gittos Head of Governance
Tim Clark Civic Support Manager

Laura Noonan Electoral Services & Scrutiny Manager
Jas Kaur Democratic Services & Systems Manager

Donna Cope Democratic Services Officer

Part 1 – items open to the press and public

Item No. Title

1 Apologies for absence

There were no apologies for absence.

2 Declarations of interest

There were no declarations of interest.

3 Minutes of the previous meeting

That the minutes of the previous meeting held on 12 January 2023 be approved as a correct record.

4 Matters arising

There were no matters arising from the minutes of the previous meeting.

5 Municipal Calendar of Meetings 2023-2024

David Pattison, Chief Operating Officer, introduced the report: Municipal Calendar of Meetings 2023-2024. The annual report outlined the proposed timetable for Council and committee meetings for the next Council Municipal Year (2023-2024).

Jaswinder Kaur, Democratic Services and Systems Manager, outlined the report, highlighting the key points. It was noted that there would be an additional Scrutiny Board in March 2024, and at the request of the Finance Team, the February 2024 Cabinet meeting was scheduled to take place in half term week.

The report was considered by Committee, and David Pattison, Chief Operating Officer, responded to questions asked.

Resolved:

That Council be recommended to:

1. Approve the City of Wolverhampton Council Municipal Calendar of Meetings for 2023-2024.

That Governance & Ethics Committee:

- 1. Approved consultation with the political groups on the City of Wolverhampton Council Municipal Calendar of Meetings for 2023-2024.
- 2. Delegated any amendments to the City of Wolverhampton Council Calendar of Meetings for 2023-2024 to the Chair of Governance and Ethics Committee in consultation with the Chief Operating Officer following consultation with political groups.

6 Local Election Fees and Charges 2022-2023

David Pattison, Chief Operating Officer, introduced the report: Local Election Fees and Charges 2022-2023. The report outlined the proposed schedule of election fees for May 2023 and highlighted the key changes. The fees and charges had to be set locally and were regularly reviewed across the West Midlands region to ensure consistency.

Laura Noonan, Electoral Services and Scrutiny Manager, outlined the report and summarised key changes from the previous year. The fees had largely remained the same except for polling staff pay and training fees in order to reflect the additional responsibilities as a result of the Election Act.

The report was considered by Committee.

Resolved:

That Governance & Ethics Committee:

1. Approved the proposed schedule of fees for May 2023.

7 Update on Preparations for Local Elections

David Pattison, Chief Operating Officer, introduced the report: Update on Preparations for Local Elections. The report provided an update on the preparations underway for the local elections taking place on 4 May 2023.

The Chief Operating Officer welcomed further suggestions from members on the current arrangements and thanked the Elections Team for their hard work.

Laura Noonan, Electoral Services and Scrutiny Manager, outlined the report, noting that since the agenda had been published the number of Voter Authority Certificate (VAC) applications had increased to 376 and Voter ID leaflets had been printed in the most widely spoken languages across the city.

The report was considered by Committee, and members commended the Elections Team on their hard work. The Electoral Services and Scrutiny Manager responded to questions asked and it was noted that:

- The recommendation to publicise the most common forms of acceptable voter ID would be raised with the Communications Team and fed back to the Chair of Governance.
- Posters advertising the acceptable forms of voter ID and other key election information were currently displayed in libraries, leisure centres and other council venues.
- A list of acceptable voter ID was located inside each polling card.
- British Sign Language students from Wolverhampton University had been recruited to some polling stations across city, and details of these locations could be viewed on the council website.
- The Elections Team proposed to incorporate banners at the bottom of all council internal and external emails, detailing key information regarding voter ID and postal votes.
- Letters would be sent out to those who had not yet returned their annual postal vote signature refresh.
- Following consultation with the Leader, the Leader of the Opposition, and ward councillors, all polling stations were now in place.
- The training for count assistants was scheduled for early April, and as requested by committee, would be filmed, and shared with members.
- Food arrangements would be in place for staff during the election count, and the use of plastic water bottles would be considered.
- Additional measures, including extra staff and venues, had been put in place for processing postal votes to ensure a more efficient approach.

Resolved:

That Governance & Ethics Committee:

1. Noted and provided feedback on the preparations underway for the forthcoming elections.

8 Councillor Enquiry Unit Update

David Pattison, Chief Operating Officer, introduced the Councillor Enquiries Unit (CEU) Update. It was noted that delays were still being experienced with individual service areas and these were being addressed.

Laura Gittos, Head of Governance, presented an overview of cases received by the CEU over the last municipal year and thanked members for utilising the system.

The update was debated by Committee, and although some members thought the CEU worked well, other members queried the data presented and felt it could be misleading.

The Head of Governance and Chief Operating Officer, replied to questions asked and it was noted that:

- The data obtained by the CEU was used to highlight areas of concern and seek to improve council performance in those areas.
- To avoid confusion, CEU cases that had not been resolved entirely at that time, could be marked as 'paused' instead of 'closed'.
- Digital developments of the CEU system were being looked into and a report on the matter would be taken to the Councillor Development Advisory Group.

Resolved:

That Governance & Ethics Committee:

1. Noted the Councillor Enquiries Unit update.

9 Councillor Induction Programme and Handbooks (Councillor and Mayoral) 2023-2024

David Pattison, Chief Operating Officer, introduced the report: Councillor Induction Programme and Handbooks (Councillor and Mayoral) 2023-2024.

The report outlined the proposed roll out of the new Councillor Induction Programme 2023-2024 for new and existing councillors to take place after the local elections held on 4 May 2023.

Laura Gittos, Head of Governance, outlined the report, highlighting key improvements, including additional Councillor sessions and the introduction of city tours. Copies of the new Councillor and Mayoral Handbooks were provided, and the Head of Governance welcomed feedback from members.

The report was considered by Committee, and members thanked officers for their hard work. The importance of Councillor training was acknowledged, and the Chair requested that during their induction, new Councillors be encouraged to access papers via their electronic device.

Resolved:

That Governance & Ethics Committee:

- 1. Approved the City of Wolverhampton Councillor Induction 2023-2024.
- 2. Approved the City of Wolverhampton Councillor Handbook 2023-2024.
- 3. Approved the City of Wolverhampton Mayoral Handbook 2023-2024.

10 Schedule of Petitions

David Pattison, Chief Operating Officer, introduced the report: Schedule of Petitions. The report provided an overview of petitions received by the Council over the last six months and outlined the actions taken.

Jaswinder Kaur, Democratic Services and Systems Manager, outlined the report, highlighting the key points. It was noted that petitions were dealt with in line with council's Petitions Scheme, and in cases where the number of signatures was not met, officers would contact residents offering guidance on the requirements.

The report was debated by Committee.

The Democratic Services and Systems Manager responded to questions asked and it was agreed that future reports on the schedule of petitions would include details of what had been done by the service area as a result of the petition.

Resolved:

That Governance & Ethics Committee:

1. Noted the actions taken in relation to all petitions received by the Council during the last year.

11 Monitoring Officer Update

David Pattison, Chief Operating Officer, provided the following verbal update:

- A workshop to consider the Constitution would be arranged over the next two
 weeks for members of the Governance and Ethics Committee. This would
 allow for any changes to be implemented before the next Governance and
 Ethics Committee in July 2023. The workshop would be hybrid, allowing
 members to attend physically or online.
- The webcasting equipment in the Council Chamber would be updated at the end of May 2023, and the equipment in there currently would be moved into Committee Room 3, thus allowing the webcasting of meetings from both rooms.

The update was considered by committee, and the Chief Operating Officer responded to questions asked.

Resolved:

That Governance & Ethics Committee:

1. Noted the update from the Monitoring Officer.

12 Presentation on Fairtrade Provision

The presentation on Fairtrade Provision had been withdrawn from the agenda.

The Chair closed the final meeting of the Municipal Year by thanking Members and officers for their support throughout the previous twelve months. The Committee reciprocated it's thanks to the Chair.

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Agenda Item No: 6

CITY OF WOLVERHAMPTON COUNCIL

Governance and Ethics Committee

6 July 2023

Report title Conferring the Title of Honorary Alderman

Cabinet member with lead

responsibility

Councillor Ian Brookfield

Leader of the Council

Accountable director David Pattison, Chief Operating Officer

Originating service Governance

Accountable employee Jaswinder Kaur Democratic Services and Systems

Manager

Tel 01902 550320

Email Jaswinder.kaur@wolverhampton.gov.uk

Report to be considered

by

Council 19 July 2023

Recommendation for decision:

The Governance and Ethics Committee recommends that Council:

1. Convene an extraordinary meeting on the 19 July 2023 to confer the title of Honorary Alderman on former Councillors Philip Page and Jonathan Yardley.

1.0 Purpose

1.1 To consider whether to confer the title of Honorary Alderman on former Councillors Philip Page and Jonathan Yardley who ceased to be a Members of the Council in May 2023.

2.0 Background

- 2.1 In July 1998 the Council agreed to establish a policy for the appointment of Honorary Aldermen, for which there is provision in the Local Government Act 1972 (Section 249). Subsequently, in September 1998, the then Policy and Resources Committee endorsed a procedure for reporting to Council on this matter and determined the eligibility criteria. The service criterion was reduced from 24 years to 20 years by resolution of full Council on 14 July 2010.
- 2.2 Under the provisions of the Council's Constitution, the function of advising full Council on the conferment of the title of Honorary Alderman rests with the Governance and Ethics Committee, and therefore, the Committee is asked to consider this proposal.
- 2.3 Honorary Aldermen are invited to attend full Council meetings in a non-participating capacity and are also invited to various functions such as Civic and Remembrance Sunday and other appropriate civic events. The names of Honorary Aldermen are inscribed on a roll of honour board on the ground floor of the Civic Centre.
- 2.4 The Local Government Act 1972 Act provides that an extraordinary Council meeting be convened for the purpose of conferring the title and the necessary resolution must be passed by not less than two thirds of the Members voting. It is proposed that the extraordinary meeting be convened prior to the ordinary Council meeting on 19 July 2022.

3.0 Conferment of the title of Honorary Alderman

- 3.1 Mr Page has a total of 20 years' distinguished service. During this time, he has not only served the residents of Bilston North Ward, but also held many important positions within the Council impacting on the lives of the citizens of our whole City. They are too numerous to mention, but in particular he was the Mayor of the City of Wolverhampton in 2018-2019 and the Cabinet Member for Schools, Skills and Learning. He Chaired Statutory Licensing Committee, Regulatory Committee, Health Scrutiny Panel and Human Resources Panel. He was Vice Chair of Human Resources Appeal Panel. He had also taken an active part on the other regulatory committees, scrutiny panels and reviews and advisory bodies he served on.
- 3.2 Mr Page's service meets the criterion for eligibility for conferment agreed by the Council. Following consultation with the political groups on the Council it is proposed that the title of Honorary Alderman is bestowed on him.
- 3.3 Mr Yardley has a total of 20 years' distinguished service. During this time, he has not only served the residents of Tettenhall Regis Ward, but also held many important positions within the Council impacting on the lives of the citizens of our whole City. They

are too numerous to mention, but in particular he was Cabinet Member for Neighbourhoods and Community Safety and Chaired Planning Committee. He Chaired Planning Committee. He was Vice Chair of Planning Committee, Superannuation Committee, Enterprise and Business Scrutiny Panel, Stronger City Economy Scrutiny Panel and Audit and Risk Committee. He had also taken an active part on the other regulatory committees, scrutiny panels and reviews and advisory bodies he served on.

3.4 Mr Yardley's service meets the criterion for eligibility for conferment agreed by the Council. Following consultation with the political groups on the Council it is proposed that the title of Honorary Alderman is bestowed on him.

4.0 Financial implications

4.1 As was the case with previous Honorary Aldermen it is the intention to present the former Councillor with a badge of office. These will be drawn from an existing stock of badges purchased prior to this financial year. A small cost will be incurred in inscribing the name of the Honorary Alderman on the badge, and also on the roll of honour board, but this can easily be accommodated within existing Democratic Services budgets. [SR/19062023/B]

5.0 Legal implications

- 5.1 Section 249 of the Local Government Act 1972 enables a local authority to confer the title of Honorary Alderman on "persons who have, in the opinion of the Council, rendered eminent services to the Council as past Members of the Council but who are not then members of the Council".
- 5.2 [TC/12062023/B]
- 6.0 Equalities implications
- 6.1 There are no direct equalities implications arising from the recommendation of this report.
- 7.0 All other Implications
- 7.1 There are no other implications arising from the recommendation of this report.
- 8.0 Schedule of background papers
- 8.1 None
- 9.0 Appendices
- 9.1 None



Agenda Item No: 7

CITY OF WOLVERHAMPTON COUNCIL

Governance and Ethics Committee

06 July 2023

Report title Update on the 2023 Annual Canvass

Cabinet member with lead

responsibility

Councillor Paula Brookfield

Cabinet Member for Governance and Equalities

Accountable director David Pattison, Chief Operating Officer

Originating service **Electoral Services**

Accountable employee Alice Peacock **Deputy Electoral Services Manager**

> 01902 550551 Tel

Email Alice.Peacock@wolverhampton.gov.uk

Report has been considered by

Election Board

19 June 2023

Recommendation for action or decision:

The Governance and Ethics Committee is recommended to:

1. Note the timetable for the 2023 annual canvass and to provide feedback on the approach.

1.0 Purpose

1.1 To outline the approach and timescales for the 2023 Annual Canvass.

2.0 Background

- 2.1 It is a legal requirement for the Electoral Registration Officer (ERO) to carry out an annual canvass to ensure that the electoral register is up to date.
- 2.2 This is the fourth year of the reformed annual canvass. The annual canvass started with a national data match of the electoral register with Department for Work and Pension (DWP) records to categorise properties into route one matched properties (indicating no change in household composition), or route two no match (indicating a change in household composition). This allows the ERO to take a flexible approach and target resources on properties where there is a change.
- 2.3 Route one properties receive a 'light touch' canvass, where they are sent a canvass communication but only need to respond if there is a change. The route two properties must respond and are sent multiple different types of communications including a door knock to elicit a response. There is also a route three for properties with a senior responsible officer who can respond on behalf of the residents. In Wolverhampton, Care Homes with a senior responsible officer are assigned to route three.
- 2.4 The earliest the annual canvass can start by 3 July and conclude by 1 December for the publication of the revised register. Wolverhampton started contacting electors as part of the annual canvass on 4 July 2023.

2.5 The timetable is set out below:

Communication	Date	Detail
Route 1 Canvass Communication A (CCA) Email	4 July	To matched households where an email address is held. They must respond to this.
Route 1 CCA Letter	7 August	To matched households where an email address is not held or where a response was not received to the email. They only need to respond if there is a change. Printed on green paper.
Route 2 Canvass Communication B (CCB) Letter	10 July	To not matched households. Response required. No prepaid envelope – encourage response online. Printed on yellow paper.

Route 2 Canvass form	15 August	To not matched households who have not responded to CCB form. Response required. Pre-paid envelope provided
Route 2 CCB Telephone canvassing	10 August-7 September	To not matched households where a telephone number is held.
Route 2 Door Knock	13 September-30 October (with potential to extend)	20 canvassers will be employed to carry this out.
Route 3 Contacting responsible officers	1 August-30 November	For Care Homes with lead officers to confirm resident's details

3.0 Data match

- 3.1 Before commencing the annual canvass, Electoral Services ran a data matching exercise with national Department for Work and Pensions records, and local council tax and customer service records. The match rate returned for this year was 81% (94,321) of properties that indicated no change in household composition, which was the same match rate as the 2022 annual canvass.
- 3.2 Our data match continues to be above the national average reported by the Electoral Commission which recorded a national match rate of 74.4% in 2022 and 75% in 2021. On a local level our match rate is currently above the 2022 average of 74.2% recorded for the West Midlands, evidencing a high level of accuracy and completeness in the electoral register.

4.0 Route One

- 4.1 Properties in Route 1 only need to respond if there is a change, except for those who received an initial email as they are required to respond to ensure that the communication has reached the property.
- 4.2 Households without email addresses and those who do not respond to the email will be sent a Canvass Communication Form A (CCA) which is a two-sided A4 letter without a pre-paid envelope. The CCA form shows the names of people registered at the address and will invite them to respond online only if there are changes required. However, the aim with Route 1 properties is not receive 100% response as a response is only required if there is a change.
- 4.3 Emails will be sent to 46,201 properties this year compared to 42,838 in 2022 and 15, 507 in 2021. This shows the steady increase in electors submitting their email addresses as part of the electoral registration process. The increase in electors that are contacted via this method reduces the printing costs and administration tasks for Electoral Services allowing for more time to target non-responders in other routes.

- 4.4 In 2022 there were some queries from residents checking whether the email was legitimate as they had not been contacted in this way before. To reduce queries this year communications will be put out in residents' newsletters and on the website to inform residents that they may receive this email.
- 4.5 The table below shows the breakdown of current contact details held for Route 1 electors.



5.0 Route Two

- 5.1 All households in this route are required to respond and the ERO is required to contact these households three times and one of these must be a personal canvass such as a telephone call or door knock.
- 5.2 Where telephone numbers are held, telephone canvassing will be undertaken by customer services employees to deliver this service. There are currently 4,926 electors that can be targeted by telephone in Route 2 for this year's canvass.
- 5.3 The table below shows the breakdown of current contact details held for Route 2 electors.



5.4 Twenty canvassers will be employed to cover the door knock stage for each ward. They will attend each property for the minimum two required visits and will return to properties that require more targeted canvassing.

5.5 This year the door knock stage has been brought forward one month from last year, the feedback from canvassers was that they preferred working September – October due to the weather and daylight hours. Further extension of the door knock stage can be implemented on a case-by-case basis.

6.0 Route Three

6.1 Route 3 properties are care homes where there is a senior responsible officer who can respond on behalf of all the residents. From August, Electoral Services will take a more targeted approach to generating responses from Route 3 properties including emailing and calling senior responsible officers up to three times. Electoral Services have brought forward the dates for contacting Route 3 properties to allow more time for responsible officers to respond.

7.0 Financial implications

7.1 The annual canvass process is funded from the current electoral registration net expenditure budget of £378,380. [SR/19062023/A]

8.0 Legal implications

8.1 All of the preparations outlined in this report meet the statutory provisions for the annual canvass. [SZ/20062023/P]

9.0 Equalities implications

9.1 The nature of the reformed Annual Canvass enables Electoral Registration Officers to focus resources on the wards where the data indicates that there has been a change in household composition.

10.0 All other Implications

10.1 There are no other implications arising from this report at the current time.

11.0 Schedule of background papers

11.1 Evaluation of Annual Canvass 2022, Governance and Ethics Committee, 12 January 2023



Agenda Item No: 8

CITY OF WOLVERHAMPTON COUNCIL

Governance and Ethics Committee

6 July 2023

Report title Evaluation of May 2023 Local Elections

Cabinet member with lead

responsibility

Councillor Paula Brookfield

Accountable director David Pattison, Chief Operating Officer

Originating service Electoral Services

Accountable employee Laura Noonan Electoral Services and Scrutiny Manager

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Report has been considered by

Election Board

20 June 2023

Recommendation for action:

The Governance and Ethics Committee is recommended to:

1. Provide feedback on the May 2023 local elections.

The Governance and Ethics Committee is asked to note:

- 1. The timeline for the next changes to be implemented in the Elections Act.
- 2. The date for the next statutory review of polling districts and polling stations.
- 3. The final parliamentary boundary proposals must be reported to the House of Commons by 1 July 2023. An update report will be brought to Governance and Ethics Committee with further detail.

1.0 Purpose

- 1.1 To provide a summary of the areas of success and areas for improvement following the evaluation exercise undertaken on the local elections that took place on 4 May 2023.
- 1.2 To provide an update on the further legislation changes to be introduced under the Elections Act.
- 1.3 To provide an update on the next statutory review of polling districts and polling places.

2.0 Background

- 2.1 Following each election, a comprehensive evaluation exercise is undertaken to ensure that lessons are learned to continue to improve on the conduct of elections. Feedback has been captured from the following stakeholders:
 - Returning Officer and Deputy Returning Officers
 - Candidates and Agents
 - Electoral Services Team
 - Voter ID Team
 - Internal teams that support elections ICT, Customer Services, Communications, Events, Audit
 - Polling Station Staff
 - Count Staff
- 2.2 This was a particularly considerable election to conduct because all 60 Councillor seats were up for election on the new ward boundaries. As a result of the new ward boundaries there was also a significant number of changes to polling station venues.
- 2.3 These were also the first elections to be held since the introduction of Voter ID and the new accessibility requirements for polling stations.
- 2.4 Due to the complexity of these elections, a decision was taken by the Returning Officer to count the votes the next day on Friday 5 May.
- 2.5 There were 185,122 electors eligible to vote at this election, and a total of 48,206 votes were cast. The overall turnout was 26%.
- 2.6 There were 34,061 postal voters, which is 18% of the electorate. 19,063 postal ballot papers were included in the count, which equates to 40% of the total votes.
- 2.7 There were 168 electors who were initially turned away on Voter ID grounds 113 of these returned with an acceptable form of ID. There were 55 electors who were refused a ballot paper on Voter ID grounds.
- 2.8 There were 65 proxy voters and one emergency proxy appointed.

- 2.9 There were 126 polling stations. A total of 15 schools were used as polling stations, which is a reduction of 9 from the 24 used as the 2022 local elections. There were 6 temporary polling stations, an increase of 3 since the 2022 local elections.
- 2.10 A total of 840 roles were recruited to work on the elections across polling stations, the count and postal vote opening.
- 2.11 There were 153 candidates and 29 election agents.
- 2.12 Wolverhampton received £113,342 Election Act grant funding.
- 2.13 A total of 813 Voter Authority Certificates were issued by the deadline of 25 April.

3.0 Evaluation summary

- 3.1 A total of 222 surveys were completed from key stakeholders. Election Board and key internal services also contributed to evaluation feedback meetings.
- 3.2 Overall, the local election was considered to have been conducted well. The two key areas for improvement identified in the evaluation of the May 2022 elections relating to postal vote opening time and the challenge of recruiting Presiding Officers were very much improved for this election. Overall, there was very positive feedback received on the implementation of the new Election Act measures Voter ID and Accessibility.
- 3.3 The evaluation is presented below against the following eight key areas to summarise the key successes and areas for improvement:
 - Candidates and Agents
 - Staffing and training
 - Postal vote opening
 - Election printing
 - Polling Stations
 - Verification and Count
 - Voter ID
 - Accessibility

4.0 Candidates and Agents

4.1 Success:

Candidates continue to be happy with the information provided by the Returning Officer throughout the election period with 100% of Candidates and Agents who responded to the survey either very satisfied or satisfied with the information provided through the

candidates and agents briefings, guidance and weekly emails, including the new information on Voter ID and accessibility. 100% of candidates and agents found the nomination process either excellent, good or very good.

4.2 Area for improvement:

Just 9 out of 183 candidates and agents responded to the evaluation survey. It is recommended that candidates and agents will be reminded of the post-election survey in the candidates and agents briefings to ensure that as many candidates and agents have the opportunity to have their say and contribute to the evaluation exercise.

Councillors were provided with leaflets and Voter ID banners early in the year to assist with raising awareness of the new requirement. A small number of councillors collected their pack. Therefore in future, councillors who wish to use their communication packs will be able to request them rather than being provided upfront.

The nomination period was an intense period for Electoral Services. The vast majority of nominations were not completed accurately first time and many nomination papers were handed in towards the end of the nomination period. Electoral Services will consider producing a video guide to assist candidates with completing their nomination packs as many candidates reported that the video on the count methods was useful.

5.0 Staffing and Training

5.1 Success:

One of the recommendations made last year was that more senior managers across the council should be recruited to work election duties to assist with the complexity of this election and to train up a pool of employees as Presiding Officers for future elections. A total of 46 heads of service/Directors worked election duties with 19 of these working in polling stations and the rest at the count.

Following the elections last year, over 60 poll clerks were recommended as Presiding Officers by Presiding Officers and Polling Station Inspectors, but some of them needed further encouragement to feel confident to step up to the role. An additional support session was held in December 2022 ahead of appointment letters going out to encourage them to apply. There were 8 poll clerks who stepped up to work as Presiding Officers this year as a result of this support session. Another session will be arranged for this year for the 60 poll clerks who were recommended as Presiding Officers to continue to develop this pool of staff.

A number of Presiding Officers were recruited from authorities that did not have elections this year. However these volunteers will not be available next year where they will be required at their substantive authority.

A total of 23 training sessions were delivered to staff including 8 mock count sessions. 100% of staff who responded to the surveys says that they received sufficient training to carry out their role and there was a lot of positive feedback from staff on the training they received. A video was also produced for candidates and agents to demonstrate the multi-member count.

5.2 Area for improvement:

There were over 150 people who had been recruited to work at the election early in January who dropped out, with many of these dropping out in the week of the election. The reasons for drop out have been reviewed and those without a suitable reason will not be recruited in future. The difficulty to recruit and retain staff to work election duties is experienced nationally and has been reported in the Electoral Commission and Association of Electoral Administrators evaluation reports as it is becoming increasingly apparent fewer people are willing to take on evermore complex polling station roles.

6.0 Postal Vote Opening

6.1 Success:

The improvements implemented this year helped to speed up the postal vote opening process on election day. There was an earlier collection made from the Royal Mail sweep and an earlier opening session on polling day. The count taking place the next day helped to ease pressure on the postal vote opening team.

6.2 Area for improvement:

The postal vote opening process takes time to complete and it's important that accuracy comes before speed. Further process improvements will be made to continue to drive efficiency.

7.0 Election Printing

7.1 Success:

The postal vote pack design was much improved as a one-piece mailer. There was less confusion from electors. A video guide on how to complete was also created and a link included in the postal vote pack.

7.2 Area for improvement:

The new requirement to list all of the acceptable forms of ID required a new design of the poll card. Many councils changed their poll cards to enveloped letters. Our brief to the printer was for the poll card to still look like the poll cards electors are used to. This did require electors to open the seal. The quality of the paper and sealing was poor and easily ripped. This has been fed back to the print supplier and this will be improved for the next elections.

8.0 Polling Stations

8.1 Success:

96% (155) of polling station staff who responded to the survey said that the polling stations were very good or good. Staff found the information providing in the Presiding Officer folders very useful to carry out their duties on the day.

Every station was provided with Voter ID requirement information in the top 10 languages spoken in the city, produced in conjunction with the equalities team. Polling station staff found this very useful and provided positive feedback.

8.2 Area for improvement:

There were a high number of complaints on temporary polling stations from electors and staff. These will be reviewed as part of the next statutory review. The Electoral Commission staffing ratio guidance increased the number of poll clerks by one to assist with Voter ID. There was feedback from staff that they felt like there were too many members of staff in some of the polling stations. The numbers of poll clerks will be reviewed for some stations for standalone local elections.

9.0 Verification and Count

9.1 Success:

100% (60) of staff who responded to the survey said that they found the count very good or good, and that they had enough information to carry out their role.

Counting the next day was much better and led to more accurate results – there were only a small number of recounts required after verification of each box. 89% of candidates and agents and 87% of staff were very satisfied or satisfied with the count taking place the next day.

The sound and the AV equipment was much improved from last year with the new supplier based in Wolverhampton.

10.0 Voter ID

10.1 Success:

The statutory instrument for Voter ID and supplementary Electoral Commission guidance was published at a very late stage, and access to the ERO portal to process applications for Voter Authority Certificates was granted at the same time as being launched publicly in January, with many of the necessary processing functionality features not ready at launch and continually amended up until close to the VAC deadline day. All of this

created a lot of risk for Returning Officers. The One Council approach to elections was a huge success in implementing Voter ID safely.

A dedicated Voter ID team was established as Improvement Managers and Graduates were deployed to support processing applications for voter authority certificates (VAC) and running drop-in sessions.

Daily drop in sessions were held in the Civic Centre from March up until the deadline, as well as 10 drop in sessions across the city in libraries and leisure centres. A total of 134 electors applied for a VAC at a drop-in session and hundreds of electors were engaged with as part of the awareness raising contact during these sessions.

Internal Audit closely monitored the roll-out of Voter ID and their report concluded that there is substantial assurance over the adequacy of the controls reviewed.

The key aspects that support this conclusion are:

- Appropriate governance and decision making processes for the acceptance and rejection of photos for VACs. There was some ambiguity around the initial requirements i.e. clear plain background. This was later relaxed to allowing photos as long as there was a clear full face image. Regularly meetings were held with the Monitoring Officer, in his capacity as Deputy Returning Officer (DRO), to discuss any images that did not strictly meet the Electoral Commission's original guidance. The Monitoring Officer had the final decision on whether a photo was accepted or not. This was further supported by advice given by the Council's Equalities team. This was also supported by a record of this decision.
- A clear audit trail was maintained in respect of cases where the initial photo
 was rejected, where there was no national insurance number match, where the
 applicant was not on the electoral register, duplicate applications, and those
 cases where an application was received after the VAC deadline.
- Appropriate internal processes and procedures which set out the checks to be undertaken for new VAC applications.
- At the time of this email there were appropriate arrangements in place for the processing, printing and issuing of temporary VACs.
- There were two cases where the Elections Team identified a potential fraudulent application, both these cases were reported to the Police for further investigation. To date neither case has resulted in a prosecution, however both applications were rejected.
- In terms of the checking of voter IDs at polling stations detailed guidance has been produced for the presiding officers and poll clerks on the types of ID that will be accepted, examples of what each type of VAC looks like (including temporary and anonymous ones). The training also covers the various

scenarios that could arise if the elector cannot provide the required ID at the polling station, such as applying for proxy vote up to 5pm on the day of the election.

 There is a provision at each station whereby ID checks that require the removal of a religious face covering can be performed in private.

Please see Appendix 1 for more information.

A comprehensive local communications campaign was launched to amplify the national Bring ID to Vote campaign primarily via digital channels in a direct and cost-effective way, while supporting it with traditional communication channels and activities. Activity was shared across the following channels:

- Media releases
- Social media posts (Facebook, Twitter, Instagram and LinkedIn accounts)
- Social media headers
- Residents e-newsletters
- Councillor updates
- All councillor briefing sessions
- MP communication
- Leaflets for all councillors and prospective candidates
- Display banners distributed to councillors
- Leaflets and banners displayed at council buildings across city
- Leaflet included in council tax booklet to all homes
- Leaflet included in Wolverhampton Homes rent letter
- Digital traffic signage across city
- Digital displays at Civic Centre
- Wolverhampton Chronicle wrap full back page advert
- Community radio
- Leaflets distributed to all care homes
- All CWC internal communications channels

There was a lot of feedback from staff in the survey that the majority of electors voting on the day were aware of the requirement as electors brought their ID.

10.2 Area for improvement:

The take up of daily drop-in sessions at the Civic Centre low. Future drop-in sessions would be focused more around libraries where there was higher demand.

11.0 Accessibility

11.1 Success:

Despite the challenges of late legislation on accessibility being made on 29 December 2022, and Returning Officer guidance being issued in February 2023, a working group was established in Wolverhampton well ahead of schedule in September 2022. The working group represented the views of people with hearing loss, sight loss and learning disabilities and they co-produced the local improvements that were made in addition to the Electoral Commission guidance. One of the most useful introductions was the development of an accessible signage pack on yellow background for people with sight loss and the recruitment of 10 British Sign Language students from the university who were recruited to work in polling stations. This has been shared with the AEA and Electoral Commission as good practice and the working group fed back that they were very impressed with the work that had been undertaken in the short timescales.

11.2 Area for improvement:

An accessibility event was booked for March to invite people with disabilities to the Civic Centre to find out more about voting and to walk through a polling station to experience the voting procedure. There was little interest in this event and the feedback was that we need to offer smaller more targeted sessions with various disability groups.

12.0 Business Continuity

- 12.1 This year a detailed review and plan was produced to ensure that from the period December to May we have appropriate contingency in place should anything occur.
- 12.2 The plan this year also reviewed the electronic system used in the electoral services team, and further work is planned to review this.

13.0 Elections Act - Next Steps

- 13.1 The Combined Authority Mayoral and Police and Crime Commissioner elections taking place in May 2024 will now be on the first past the post system, not the Supplementary vote.
- 13.2 Draft postal and proxy voting legislation has been published which seeks to:
 - Limit the total number of electors for whom a person may act as a proxy to four, of which no more than two can be for 'domestic' electors for all electoral areas.

- Political parties and campaigners will be banned from handling postal votes
- An identity check will be introduced for all applications for a postal or proxy vote.
 This will bring the absent vote application process in line with the individual electoral registration process.
- Postal votes will need to reapply for a postal vote every three years replacing the current five-year signature refresh.
- Electors will be able to apply for a postal or proxy vote online.
- 13.3 The 15-year limit on voting rights for British citizens living overseas will be removed and the registration period will be increased to 3 years instead of one year.
- 13.4 Automatic candidacy and voting rights will cease for EU citizens. Two groups of EU citizens will retain their rights qualifying EU citizens and EU citizens with retained rights.

14.0 Statutory Review of Polling Districts and Polling Stations

- 14.1 The next compulsory statutory review of polling districts and polling stations must take place between October 2023 and January 2025. The last polling district review took place in 2022 following the local government boundary review, where substantial changes were made. Therefore, It is expected that this review will see fewer changes.
- 14.2 It is proposed that it will be conducted in October 2023 so that changes are in place for the May 2024 elections. The proposed timetable has been presented below:

Activity	Month
Conduct preliminary review inviting feedback from councillors and prepare schedule of polling districts and places for consultation	August - September
Publish a notice of the holding of the review	2 October 2023
Publish ARO representation	2 October 2023
Public consultation period	2 October 2023– 13 October 2023
Analyse responses and prepare recommendations	16 – 18 October
Governance and Ethics Committee to consider	26 October 2023
representations and make recommendations to Full Council	
Full Council to consider recommendations from Governance and Ethics Committee	8 November 2023

Amend the electoral software to reflect new polling district and place scheme	November 2023
Publish revised register with new polling districts	1 December 2023

15.0 Financial implications

- 15.1 The cost of running local elections to the Council in any year is dependent on whether they are standalone or combined with Parliamentary, Police and Crime Commissioner or Combined Authority Mayoral elections. Combined elections costs are effectively shared, part funded by Government or the Combined Authority.
- 15.2 In the event of combined elections or fallow years, significant underspends against the local elections budget have provided scope for contributions to the Elections Reserve which can be drawn upon in years with increased costs.
- 15.3 The budget for local elections in 2023-2024 is £277,000. As a standalone election, additional funding will also be drawn from reserves as appropriate. This election was forecast to be higher than usual due to the implementation of Voter ID and that it was an all out election. The Council was awarded £113,342 Election Grant funding spanning the 2022-2023 and 2023-2024 financial years. The full cost of the implementation of Voter ID and Accessibility is still being assessed and there is scope to apply for additional funding relating to Voter ID.

[LD/27062023/W]

16.0 Legal Implications

16.1 All recommendations arising from the report are in line with the statutory provisions covering the delivery of electoral registration and delivering elections activity.

[SZ/20062023/P]

17.0 Equalities implications

17.1 The elections complied with the public sector equality duty. Reasonable adjustments to voter were made for electors with disabilities in the polling stations and the Returning Officer went above and beyond the Electoral Commission guidance on the Accessibility measures within the Election Act. Polling staff received adequate training on Accessibility.

18.0 All other Implications

18.1 There are no other implications arising from this report at the current time.

19.0 Schedule of background papers

19.1 Evaluation of May 2022 Elections, Governance and Ethics Committee, 7 July 2022

- 19.2 Preparations for May 2023 Local Elections, Governance and Ethics Committee, 12 July 2023
- 19.3 Update on Preparations for Local Elections, Governance and Ethics Committee, 16 March 2023
- 19.4 The Representation of the People (Postal and Proxy Voting etc.) (Amendment)
 Regulations 2003. Available at: <u>Draft Statutory Instrument: The Representation of The People (Postal And Proxy Voting Etc.)(Amendment) Regulations 2023</u>
 (publishing.service.gov.uk)
- 19.5 Voter ID at the May 2023 local elections in England: interim analysis, Electoral Commission, 19 June 2023: Voter ID at the May 2023 local elections in England: interim analysis | Electoral Commission
- 19.6 AEA 2023 Post Polls Review. Under pressure: increased demand on the UK electoral system, Association of Electoral Administrators, June 2023: <u>AEA-2023-Post-Polls-Report-27-June-2023.pdf</u> (aea-elections.co.uk)

20.0 Appendices

20.1 Appendix 1: Audit Report on Implementation of Voter ID

Internal Audit Report:

Elections Voter ID

2023/2024



1 Executive Summary

Introduction

An audit of Council's arrangements for the implementation of elections voter ID was undertaken as part of the approved Internal Audit Plan.

On 28 April 2022 the UK Parliament passed the Elections Act 2022, introducing voter identification for in-person voting. This required voters in Great Britain to show a form of photographic identification ('photo ID') before being given their ballot paper in polling stations in certain elections. The first elections this would be implemented on in Wolverhampton were the local elections that took place in May 2023. Electors without a valid form of ID are able to apply for free photo ID called a Voter Authority Certificate (VAC). Each local authority Registration Officer is required to process VAC applications made via the government portal, and to make provision for electors to apply for a VAC by post or in person). The Council were also required to publicise the new voter ID requirements and ensure appropriate arrangements were in place to verify ID at polling stations before the elector was issued a vote.

For the May 2023 elections the deadline for the successful processing of VAC applications was close of play on 25 April 2023. Details around the number of applications received and processed were:

Number of applications received:	
Number of applications processed and sent for print:	813
Number of applications on hold (i.e. awaiting additional information):	22
Number of applications rejected:	72
Number of applications in progress (i.e. not registered to vote in time):	15

It should be further noted that the Council only issued one temporary VAC following the deadline date of 25 April 2023.

Objectives, potential risks and scope of audit work

Our audit was conducted in conformance with the Public Sector Internal Audit Standards and considered the following:

Objectives:	To ensure the Council has suitable arrangements in place to implement the new requirements set out in the Elections Act 2022.
Potential Risks:	 The Council does not comply with legislation The elections process is legally challenged and has to be re-run Delays in election results Reputational risk to the Council
Scope:	 This review focussed on the following areas: The governance arrangements for overseeing the implementation of voter ID The resourcing for the processing of VACs and temporary VACs Publicity and awareness campaigns The resourcing of polling stations to implement voter ID checks Post election feedback and lessons learnt

Limitations to the scope of our audit:

The was a high level review of the process and no testing was performed for the processing of individual VAC applications.

Overall Conclusion

Our audit provides **substantial** assurance over the adequacy of the controls reviewed as part of the process to mitigate risks to an acceptable level.

No Assurance	Limited	Satisfactory	Substantial
Immediate action is required to address fundamental gaps, weaknesses or noncompliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.

The assurance opinion was given due there being no major issues arising from the changes to the local elections in May 2023. It should be noted there was only one issue where a voter was incorrectly refused a vote due to presenting a Romanian passport as a form of ID. This was due to the presiding not following the guidance presented to them or contacting their polling station inspector.

Key issues identified

We rate each issue identified based on the following:

Action is imperative to ensure that the objectives for the area under review are met

Amber

Action is required to avoid exposure to significant risks in achieving objectives

Green

Action is advised to enhance risk control or operational efficiency

We have identified no red or amber issues where improvements could be made. However, we have raised four issues classified as green which are further detailed in section two of this report.

The key issues arising from this report may be included in summary form to the Audit and Risk Committee.

Examples of good practice identified

During our review we identified the following examples of good practice in the management of risk, as achieved through the effective design and application of controls:

Governance Arrangements

- A project group was established to oversee the implementation of the changes under the new elections act and support the elections team.
- Due to the ambiguity around the guidance given for acceptable VAC photos, weekly meetings
 were established with the Council's Chief Operating Officer in their capacity as Deputy
 Electoral Registration Officer to give a final decision on whether a photo should be accepted or
 rejected. These meetings moved to daily on the run up to the VAC deadline date. These
 meetings were also attended by officers from the Councils Equalities and Diversity Team to
 provide support to the process, where required.
- Regular updates were provided to the Council's Strategic Executive Board (SEB) in respect of progress made in respect of the changes.

Resourcing of VACs and temporary VACs

- The Council had a designated team, which was sufficiently resourced to process VACs applications.
- All team members received appropriate training on the processing of applications and acceptance criteria.
- The Council provided a gold level service in terms of following up applications where there was incomplete information. This involved sending follow-up emails and also phone calls to chase applicants for outstanding information in order to complete their applications.
- A clear audit trail was maintained in respect of cases where the initial photo was rejected, where there was no national insurance number match, where the applicant was not on the electoral register, duplicate applications, and those cases where an application was received after the VAC deadline.
- There were two cases where the Elections Team identified a potential fraudulent application, both these cases were reported to the Police for further investigation. To date neither case has resulted in a prosecution, however both applications were rejected.

Publicity and awareness campaigns

- A detailed communications plan was produced which set out the campaign for informing residents of the city of the new changes and the requirement to provide ID when voting.
- Awareness leaflets were included in the annual Council Tax bills to residents and Wolverhampton Homes rent letters.
- The team visited various Council buildings, including leisure centres and libraries, informing
 residents of the new changes and the requirement to produce voter ID. This correlated with the
 number of VAC applications following these events.
- Provided details around the requirements for voter ID on poll cards
- Adverts were place in local newspapers and chronicles.
- Voter ID awareness material, produced by Government, was printed for all candidates up for election, which could be used as part of their canvassing campaign.
- Awareness posters were also displayed in all Council buildings and a banner was placed on the Council's website.

Resourcing of polling stations

- All polling station staff received detailed training and guidance on the acceptable forms of ID required to vote. This was evidenced by the fact that little if no issues were raised or reported to the polling station supervisors.
- Privacy screens were present at all polling stations
- The Council appointed a number of Voter ID Polling Station Inspectors from Legal Services in addition to Polling Station Inspectors who were available during polling day to resolve any issues raised by Presiding Officers particularly in respect photo ID queries.

Resourcing of polling stations

- The elections team held a lessons learnt exercise to review the outcomes of the current elections to identify where improvements could be made.
- All staff involved in the elections were sent a survey to ascertain their experience of the process and ascertain if there were any issues.

Acknowledgment

Several employees gave their time and co-operation during this review. We would like to record our thanks to all those concerned.

2 Findings and Recommendations

Action is advised to enhance risk control or operational efficiency

Green

1. Future resourcing of voter ID applications

Finding:

As this was the first election where voter ID was implemented the Council established a project team to oversee the processing of Voter Authority Certificate (VAC) applications. In the words of the Elections Team they provided a gold level of service and support to applicants, which involved follow-up emails and phone calls to chase outstanding information required to complete the processing of their application. This also involved the use of manual processes in terms of logging, recording and monitoring the progress of each application, which the team described as being resource intensive. In some cases the team were supporting residents to register to vote as well.

In addition to the processing of VAC applications the team were also involved in awareness campaigns across the city this involved visiting the Council's libraries and leisure centres, which saw surge in applications after these events.

Following the May 2023 local election this team was disbanded, and the processing of VACs has reverted to business as usual. However, going forward, there was uncertainty around the level of support required for future elections and the resourcing requirements, particularly for the next General Election.

Implication:

Insufficient resources are in place to respond to demand on the run up to an election

(Agreed) Recommendation:

- (i) An options paper will be developed which will set out the future levels of support the Council can provide to promoting and supporting VAC applications along with the resourcing requirements for each option. This should be presented to SEB for approval of the preferred support option.
- (ii) In order to reduce the manual processes for future elections consideration will be given to developing an automated internal solution, alongside the portal, to assist with the processing of VAC applications.

Responsible Officer:	Target Date:
Laura Noonan, Electoral Services and Scrutiny Manager	30 December 2023

2. Notifications via the Government Portal

Finding:

Based on a post review of elections by the Elections Team one area of improvement identified for future elections was the use of the government portal for sending notifications out to applicants. As part of the process the elections team were not utilising the notifications facility on the portal to inform applicants that their application had been processed successful and their VAC was being printed and posted. By using this facility applicants would able to look out for their certificate in the post and alert the Council if it was not received. This in turn would have reduced the number of calls received in chasing up their application.

Implication:

Ineffective use of resources in responding applicant update queries.

(Agreed) Recommendation:

For future elections and business as usual, the notification function on the government portal will be utilised to inform applicants on the progress of the VAC application.

Responsible Officer:	Target Date:
Laura Noonan, Electoral Services and Scrutiny Manager	30 June 2023

3. Potential budget savings

Finding:

As this was the first election where voter ID was implemented the Council put a number of measures in place to promote and ensure compliance with voter ID requirements.

This included printing material for candidates to use as part of the electoral canvassing campaigns. However, there was a low uptake by candidates for the use of this printed material, which resulted in there being surplus stock.

It was also noted the Council appointed a number of Voter ID Polling Station Inspectors (PSIs) to support polling station presiding officers should any queries arise in respect of any forms of ID being presented. Based on information provided by the Elections Team Voter ID PSIs were not called upon during the day of the election, which is testament to the training and guidance given to Presiding Officers and Polling Station Inspectors, and Electoral Services were able to sufficiently respond to Voter ID queries received throughout the day without needing to refer.

Implication:

Inefficient use of the elections budget

(Agreed) Recommendation:

- (i) For future elections a promotions pack will be developed, which can be ordered by candidates, in for order material to be printed as required, thus reducing elections printing costs.
- (ii) The need for Voter ID PSIs for future elections will be reviewed based on the feedback received from the elections in May 2023.

Responsible Officer:	Target Date:
Laura Noonan, Electoral Services and Scrutiny Manager	31 March 2024

4. Retention of VAC application data

Finding:

Based on information provided by the Elections Team it was established the VAC application data is being kept longer than the specified 28 day retention period recommended by The Electoral Commission. Currently, data is retained longer than 28 days to allow for weekly updates on the total number of applications received processed, rejected and on hold for further information.

Implication:

Potential information governance risk in that the Council is retaining elections data longer than the recommended period.

(Agreed) Recommendation:

The Council will review elections data currently held by the Council to ensure it does not exceed the recommended 28 day period specified by the Electoral Commission. If weekly updates are still required, the Council will investigate whether this data can be obtained directly from Government sources.

Responsible Officer:	Target Date:
Laura Noonan, Electoral Services and Scrutiny Manager	31 July 2023

Limitations inherent to the internal auditor's work

This report has been prepared solely for the Council in accordance with the terms and conditions set out in the terms of reference. Internal audit does not accept or assume any liability of duty of care for any other purpose or to any other party. This report should not be disclosed to any third party, quoted or referred to without prior consent. Internal audit has undertaken this review subject to the limitations outlined below.

Internal control

 Internal control systems, no matter how well designed and operated, are affected by inherent limitations. These include the possibility of poor judgement in decision making, human error, control processes being deliberately circumvented by employees and others, management overriding controls and the occurrence of unforeseeable circumstances.

Responsibilities of management and auditors

- It is management's responsibility to develop and maintain sound systems of risk management, internal control and governance for the prevention and detection of irregularities and fraud. Internal audit work should not be seen as a substitute for management's responsibilities for the design and operation of these systems.
- Internal audit endeavours to plan audit work so that it has a reasonable expectation of
 detecting significant control weakness and if detected, will carry out additional work
 directed towards identification of consequent fraud or other irregularities. However, internal
 audit procedures alone, even when carried out with due professional care, do not
 guarantee that fraud will be detected.
- Accordingly, these examinations by internal auditors should not be relied upon solely to disclose fraud or other irregularities which may exist.

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