

# Final Internal Audit Report:

## Postal Votes

2021/2022



# 1 Executive Summary

## Introduction

An audit of postal votes was undertaken as part of the approved Internal Audit Plan for 2021/2022. For the May 2021 local elections there was 65% increase in postal votes compared to the previous local elections in 2019. The increase in postal votes has been primarily driven by the pandemic.

Voting by post is an alternative to voting in person at a polling station. An application to vote by post is required and can be for a particular election or referendum, for a set period of time or for all future polls. To apply for a postal vote, the applicant must be on the electoral register and be eligible to vote.

## 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 provide assurance that postal votes are administered and processed in accordance with the Electoral Commission's guidance.
Potential Risks:	Failure to comply with the Electoral Commission's guidance could see the Council being exposed to a number of risks such as: reputational damage, financial penalties, or potential postal fraud.
Scope:	The review will seek assurance that postal votes have been administered in accordance with the Electoral Commission's guidance and will focus on the recent elections that have taken place including: <ul style="list-style-type: none"><li>• Processing of postal vote applications;</li><li>• Changes to postal vote applications.</li><li>• Cancellation of postal vote applications;</li><li>• Receipt and verification of returned postal votes for the appropriate election.</li></ul>
Limitations to the scope of our audit:	The review will be limited to the above scope areas and will not cover the process around the counting of votes.

## 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 non-compliance 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.	<b>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.</b>

## **Key issues identified**

We did not identify any significant red or amber issues where improvements were required to be made.

Five issues classified as green were identified, where action is advised to enhance risk control or operational efficiency which are detailed in section two of this report.

## **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:

- The increased number of postal vote applications resulting from the pandemic were planned for by the Election Teams through the recruitment and training of additional temporary staff;
- Processes for receipting and processing of postal vote applications met the requirements of the Electoral Commission's guidance;
- The Electoral Commission's guidance had been met for address changes made for voters on the Elections system;
- Receipt and verification of returned postal votes for the appropriate election met the requirements of the Electoral Commission's guidance.

## **Acknowledgment**

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

**1. Cancelled Postal Votes – retention / evidence of application forms****Finding:**

Based on information provided by the Elections Team it was established that the application forms used for the cancellation postal votes, are scanned into the Election system. These documents appear in the absent vote queue for processing. Once processed, these are then deleted in the system. However, once the postal vote has been deleted all postal vote scanned images are subsequently deleted and a paper copy is not retained.

**Implication:**

In the absence of retained documents to support cancelled postal votes, evidence of instruction to cancel postal votes could not be provided which could expose the Council to accusations and reputational damage.

**Agreed Recommendation:**

The retention of Postal Vote Cancellation forms will be reviewed to ensure there is sufficient evidence in place should decisions be challenged or scrutinised.

The Elections System's software provided will be contacted to ensure the system supports the Council's retention requirements.

**Responsible Officer:**

Electoral Services Manager, Laura Noonan

**Target Date:**

31 December 2021

**2. Processing of postal vote applications****Finding:**

Testing was performed in respect of the processing of postal vote applications. The results of this testing identified one case out of a random sample of 20, where the applicant completed the application form to indicate they only wanted to vote by post for the May 21 election. However, a review of the system identified the individual's application requested had been incorrectly entered on the system resulting in them being permanently set to vote by post. The permanent postal vote was subsequently confirmed in writing to the applicant, who had not raised this as an error at the time of this review.

**Implication:**

Postal voting requests are not accurately processed which may lead to complaints and reputational damage.

**Agreed Recommendation:**

The error identified as part of this review will be rectified and the applicant will be notified of the amendments in writing.

**Responsible Officer:**

Electoral Services Manager, Laura Noonan

**Target Date:**

30 November 2021

**3. Postal votes - name changes****Finding:**

Testing of a sample of name changes identified that in two cases, out of five tested, a new postal vote application form was not sent to the voter to collect the applicant's new signature. Further enquiries made with the Elections Team established that system does not automatically flag the record for a form to be generated or add it to a queue to be actioned. At present a manual quarterly check is undertaken of name changes for postal voters so a new form can be sent out. However, it was noted that in one of the two cases a new signature was not collected for a period of more than three months.

**Implication:**

Changes of name applications actioned on the system without the collection of a new signature on a new postal voter application may result in a rejected vote.

**Agreed Recommendation:**

Enquiries will be made with the system provider for a potential fix to the Elections system (Civica Xpress System) so that an automatically flag to the record for a form will be generated and added to an action queue. In the interim a new postal vote application form for the collection of new signatures, will be sent to voters in order for records to be updated.

**Responsible Officer:**

Electoral Services Manager, Laura Noonan

**Target Date:**

31 December 2021

**4. Cancelled postal vote applications - audit trail / reports****Finding:**

It was not possible to obtain a report from the Elections system to separately identify and test the cancellation of postal vote applications. This was because reports from the system included automatic cancellations where postal voters did not renew their existing postal vote in place and postal votes where people had passed away or moved out of the City. Planned sample testing of cancellation postal vote applications has not therefore been possible.

**Implication:**

The absence of a report of cancel postal vote instructions does not provide a clear audit trail or reporting ability of cancellation instructions.

**Agreed Recommendation:**

A review with the system provider will be undertaken to see if a fix is available to develop a report of cancelled postal vote instructions from voters.

**Responsible Officer:**

Electoral Services Manager, Laura Noonan

**Target Date:**

31 December 2021

**5. Postal vote redirections****Finding:**

Based on information provided by the Elections Team it was established that reports are available from the Elections system to identify postal vote redirections. These reports are not currently extracted from the system, and interrogated, to identify unusual patterns which may imply fraudulent activity.

**Implication:**

Levels of postal vote redirections are not monitored to identify emerging patterns of redirections resulting from fraudulent activity.

**Agreed Recommendation:**

Regular reporting from the Elections System will be undertaken on redirections for review and monitoring. The Elections Team will liaise with the Council's Counter Fraud Team to seek advice on the checks that need to be made.

**Responsible Officer:**

Electoral Services Manager, Laura Noonan

**Target Date:**

31 March 2022

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### **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.

**Report distribution:** Laura Noonan, Electoral Services Manager  
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**Date:** 25 October 2021