

# 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:

<b>Number of applications received:</b>	<b>922</b>
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:	<ul style="list-style-type: none"> <li>• The Council does not comply with legislation</li> <li>• The elections process is legally challenged and has to be re-run</li> <li>• Delays in election results</li> <li>• Reputational risk to the Council</li> </ul>
Scope:	<p>This review focussed on the following areas:</p> <ul style="list-style-type: none"> <li>• The governance arrangements for overseeing the implementation of voter ID</li> <li>• The resourcing for the processing of VACs and temporary VACs</li> <li>• Publicity and awareness campaigns</li> <li>• The resourcing of polling stations to implement voter ID checks</li> <li>• Post election feedback and lessons learnt</li> </ul>

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.
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**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>

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:

<p><b>Red</b></p> <p>Action is imperative to ensure that the objectives for the area under review are met</p>	<p><b>Amber</b></p> <p>Action is required to avoid exposure to significant risks in achieving objectives</p>	<p><b>Green</b></p> <p>Action is advised to enhance risk control or operational efficiency</p>
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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 placed 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:

Laura Noonan, Electoral Services and Scrutiny Manager

#### Target Date:

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:**

Laura Noonan, Electoral Services and Scrutiny Manager

**Target Date:**

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:

Laura Noonan, Electoral Services and Scrutiny Manager

#### Target Date:

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:**

Laura Noonan, Electoral Services and Scrutiny Manager

**Target Date:**

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.

<b>Report distribution:</b>	David Pattison, Chief Operating Officer (FINAL)
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<b>Date:</b>	26 June 2023