Cabinet Office

Elections Funding Review Stakeholder Consultation Paper

1. Introduction

1.1. The current model for election funding was introduced in 2009 for national polls. The model has been used by Returning Officers (ROs) (or Counting Officers for referendums – RO is used here as a generic term) and their staff at the 2009 European Parliamentary (EP) election, the 2010 UK Parliamentary General Election, the 2011 Referendum on the Parliamentary voting system, and the 2012 Police Crime Commissioner (PCC) elections. The previous model had provided set amounts for each head of expenditure and was regarded as inflexible in terms of allowing ROs and their teams of administrators to take account of local circumstances with suppliers and costs. The current model introduced that flexibility, and whilst funding allocations were based on a series of calculations and assumptions on how much individual items cost, ROs are able to spend flexibly within those heads against a 'maximum recoverable amount' (MRA). Information on number of postal voters, polling stations (including whether they were permanent or temporary) and if the national poll was being combined with one or more local polls on the same day was used to calculate each voting area's allocation and the MRA was set out in the Fees and Charges Order related to the national poll.

1.2. A review of the funding mechanism which was introduced for national polls in 2009, based on data collected from 2009 and 2010 was part of the initial planning for assessing allocations and refining the model. The subsequent addition of the referendum on the voting system for UK Parliamentary elections in May 2011 and the PCC elections in November 2012 provided further opportunities to gain information and data and to put in place some of the changes that were already being discussed in 2010 such as reducing the timing for submission of claims and splitting the payment of RO fees in order to cover both completion of the poll and subsequent submission of the claim detailing the expenditure.

1.3. Historic issues with late completion of claims were also resolved during this period and the absence of scheduled national elections in 2013 has provided a window in which to undertake this review. Whilst the current funding system largely works well overall, the 'one-size-fits-all' nature of the formula raises issues and anomalies that have caused us to look again at the system and, rather than just 'tweaking' the process, to propose some significant change to how the MRAs are calculated, In particular we have identified a tendency in the current system towards 'overfunding' on a global basis, whilst some individual allocations are insufficient due to local circumstances. This feeds into a larger costs and financial management issue in requiring the Treasury to borrow more money (on which interest is payable) than is necessary. Therefore, the proposals in this paper, seek to improve the model so that we get closer to requesting a more accurate amount of funding for each poll.

1.4. However, it is important to note that the current model for funding elections has not led us to a position of overspending. The high level of scrutiny of claims, implemented to analyse underspends and overspends on a granular basis for further refinement of the model, has meant that issues and anomalies have been questioned and that overall only monies spent which were necessary for the efficient and effective running of the polls have been approved. Whilst this has been seen as an onerous process (and one in which the original aim to test and question the model has been overlooked by some), it has helped identify some issues with the transparency of how expenditure decisions are taken and accounting is completed. The monies spent on the administration of running national polls should be subject to a similar level of scrutiny as other areas of public expenditure. These are issues that we want to address for the future through clearer guidance and a revised process for recording claims information.

1.5. This consultation exercise builds on the thinking that started to emerge in initial analysis in 2010, the data from subsequent claims and funding consideration and, in particular, the review work that Cabinet Office began in February 2013 and utilises analysis of ROs expenses and claims data over the last three years, to review the effectiveness of the current funding model. We are very grateful to all the stakeholders we have spoken to so far as part of the review and their valuable input has helped us to shape this document. The consultation paper sets out a number of proposals for discussion and feedback around how the current system could be improved and revised to ensure greater transparency and value for money.

1.6. The proposed changes set out within this document reflect the positive and helpful conversations that we have already held with some stakeholders. Our aim is to stimulate debate amongst electoral administrators and other stakeholders within the electoral community. Our initial conversations with stakeholders have been productive but we are keen to learn more about how the current funding arrangements can be revised. This consultation exercise, directed towards interested parties, now seeks the further views of relevant stakeholders on the key issues and challenges around the funding of elections, and also to further deepen our understanding of the system. We are particularly keen to gauge the views of administrators on how the electoral funding system works at a local level, and how it might be improved.

1.7. This is a targeted stakeholder consultation of those with an interest in this area. This includes those who run elections – ROs and electoral administrators (including the Electoral Management Board for Scotland and the Election Office for Northern Ireland) and organisations with a particular interest such as the Electoral Commission (EC), the Association of Electoral Administrators (AEA) and the Society of Local Authority Chief Executives and Senior Officers (SOLACE). In addition, Government departments that have an interest in the funding process, such as the Treasury (HMT), the Department for Communities and Local Government (DCLG including the Elections Claims Unit) and the Home Office (HO). It will also be sent to the offices for Scotland, Wales and Northern Ireland as well as the Scottish Government, National Assembly for Wales and Northern Ireland Assembly.

Scope of the review

1.8. Since the initial intention of refining the funding model and the assumptions it produces, and in particular since work began earlier in the year, the scope of the review has widened significantly. The original purpose for setting a review point was to modify and adjust the existing formula to update the set of assumptions that underpin the calculations for allocations to each RO. As as can be seen within this document, one proposal is to base the allocation on actual, previously approved expenditure, moving away from a more theoretical series of assumptions and calculations as the primary calculation, but still retaining it to cater for and assess changes (such as in electorate or postal vote usage). The scope has also widened due to the complexity we have found amongst the different approaches to setting up and running an election, local authority (LA) governance and staffing structures and variations in how funding is utilised.

1.9. The Government accepts that it would not be desirable or possible to implement all proposals and findings that emerge from the consultation in time for the 2014 EP elections. We recognise that the coming year will be a busy period for electoral administrators and their teams, planning not only for the EP elections next year but gearing up for the transition to Individual Electoral Registration (IER). We propose to adopt a phased approach, with some changes brought in for the 2014 EP elections, whilst others will implemented on a longer term basis for the 2015 UK Parliamentary General election (the General election) and beyond. As the scope and scale of the review has changed, it has further re-enforced our view that the review should be split into two phases of work.

1.10. The first phase will be looking at what changes will be made to take effect at next year's EP elections in May 2014. It is our aim to adhere to the requests made by stakeholders to give them sufficient time to adjust to new legislation and processes, so that ROs and election officials have the legislation, the accompanying guidance and know how much funding they have to work with, six months ahead of the poll, i.e. November 2013.

1.11. Some areas of the review will require further work including analysis and stakeholder engagement before a change is brought in. This will form the basis for the second phase of the review. At this stage, the General election scheduled for May 2015 looks to be a logical time to implement any further changes.

Date	**Activity**
31 July	Stakeholder Consultation launched
6 September	Stakeholder Consultation period closed
September	Update to Elections Policy Co-ordination Group on review progress (10 Sept) Presenting to various AEA branch meetings Drafting the Fees and Charges Order and Account regulations
October	Revising RO expenses and claims guidance

November	Fees and Charges Order made Guidance published
December	Funding Review Report on progress so far and next steps for second phase of work

2. The Electoral Commission's Report on the Costs of the May 2011 referendum on the UK Parliamentary voting system

2.1. In this section, we have summarised the Electoral Commission's recommendations from its report, published in December 2012, about the costs of running the national referendum on the UK parliamentary voting system held in May 2011. We have also provided our brief response to those recommendations in areas that the funding review has looked at so far. We plan to provide a fuller Government response later in the year.

2.2. We have considered the recommendations raised in the Commission's report on its management of the funding allocated for the May 2011 referendum and agree with a number of them which fit with, and in some instances follow from, much of our own analysis over the past three years. The Commission's report has been utilised to feed into the work which Cabinet Office is taking forward as part of the funding review.

Recommendations

Estimating the costs of polls

2.3. We note the Commission's recommendation that funding legislation, alongside other legislative changes should be in place six months before a relevant election. We recognise the rationale for this and have previously said that we will aspire to meet this target in order to provide certainty for those participating in and administering elections:

"We agree that it is important to give administrators and electors as much time as possible to adjust to changes in the electoral system, so that elections can run smoothly and accurately reflect the views of the electorate. As far as is practicable, we will continue to introduce changes in line with this principle"[1]

2.4. However, we are also mindful of not making a blanket commitment when there could be positive cause for changes to be made closer to the date of the poll and with the practical and technical considerations around the passage of often complex legislation in mind.

[1] Cabinet Office, The UK Government's Response to Reports on the Administration of the 2010 UK Parliamentary General Election, September 2011, p.14

https://www.gov.uk/government/publications/government-response-to-reports-on-the-2010-general-election

2.5. We note the Commission's recommendation that the funding model for future national polls should be based on the evidence of past expenditure rather than average expenditure. As has already been noted above, we agree that previous expenditure can provide a useful basis to work from with regard to future allocations. This issue is considered further in section 3 of the consultation paper which is part of the process of working with relevant organisations and individuals to develop and implement change.

Managing the costs of polls

2.6. We note the Commission's recommendation that Government should publish full cost details for the 2009 EP elections and subsequent polls. Accounts including this expenditure have already been published as part of Departmental accounts from the Ministry of Justice and Cabinet Office[2]. We will consider whether there is a proportionate and cost-effective case for formally publishing more detailed information and how that may be undertaken.

2.7. We recognise the Commission's wider concerns around the overestimation of funding for elections and the need to drive value for money and efficiencies in all allocations. These issues were identified by Government in its initial analysis of the 2009 and 2010 claims and this is the central focus of the funding review. Ensuring that public funding for elections is well spent is imperative but we also have a duty to ensure that there is sufficient flexibility and capacity within the funding system.

2.8. We agree that ROs should retain responsibility for securing best value for goods and services, to help secure the most efficient allocation of resources. ROs are statutorily responsible for effective delivery of national polls and are best placed to identify and address local needs and issues.

Administering the reimbursement of costs

2.9. We note the Commission's recommendation around the administration of the reimbursement of election costs. This matter is addressed at section 3 of the consultation paper.

2.10. We agree with the Commission's recommendation that the deadline for the submission for reimbursement claims should be no later than eight months after polling day, and to examine how it may be brought down to six months. The twelve month deadline for claims was an issue that Government identified as part of its initial consideration of the process in 2010. This matter is addressed at section 6 where

[2] Cabinet Office, Returning Officers' Expenses England and Wales, Statement of Accounts 2011-12

http://www.official-documents.gov.uk/document/hc1213/hc06/0608/0608.pdf

Government proposes that the deadline should be no more than six months after polling day.

2.11. Cabinet Office agrees that there should be clear separation between any fees paid to ROs for their services in conducting polls, and the sums paid to reimburse the costs they incur in conducting polls and transparency of what is provided and spent. The splitting of a fee to drive completion of claims was a proposal identified by Government for use at future national polls as part of initial assessments of issues in 2010 with late submission of claims from previous elections.

2.12. We have noted the points that the Commission has made on the day-to-day operational work on the reimbursement process and analysis of claims. This issue is addressed at section 7. Cabinet Office was however pleased that the overall feedback on the claims assessment process, and the Elections Claims Unit's (ECU) contribution to that process, was generally positive.

Improving the framework for the reimbursement of costs

2.13. We will consider the recommendation that the UK Government, together with the Scottish, Welsh and Northern Ireland Governments, should consolidate the Fees and Charges legislation, and should include regulations concerning the time and manner in which accounts are to be submitted within future Charges Orders. We need to consider whether this is an area that the Law Commission will cover as part of its wider review of the system of electoral law in deciding how to approach any shorter term change.

2.14. We note the recommendation that the Commission should be given responsibility for the funding arrangements at future referendums held under the Political Parties, Elections and Referendums Act (PPERA) 2000 framework including agreeing the overall allocation with the Treasury (HMT). The Commission was given the role of disbursing and accounting for the monies in May 2011 but there are no plans to extend the Commission's role to agreeing the overall allocation with HMT as the norm but the Commission's role will be considered on a case by case basis.

2.15. We note the suggestion that there should be provision made for 'solely attributable costs' arising from one poll when combined with another. From previous discussions in 2011, we note that there is no agreed view on the current legislation with regard to this and we think that legislative change would be required to support this position. The Government has not taken a position on making such a change.

2.16. We note the Commission's recommendation that ROs fees should be subject to being withheld, in part or in full, if they do not perform their duties satisfactorily (including the proper and timely submission of their claims for reimbursement of costs). We have already moved in the direction of being able to reduce or withhold fees where there is unsatisfactory performance (on a recommendation from the Commission to the Secretary of State) in recent legislation for the 2011 referendum and in the Electoral Registration and Administration Act 2013. We are keen to understand how that may impact engagement and performance of ROs in the first instance. This will provide a mechanism for scrutinising the performance of ROs in a transparent manner to ensure they are delivering elections effectively.

2.17. Cabinet Office concurs with the Commission's view that ROs at future national polls should be provided with an indemnity against their liability (effectively agreeing to meet any proper claim from the public purse), instead of obtaining such cover through expensive commercial insurance. Cabinet Office is working with HMT on the practical and funding points around this issue.

2.18. We note the recommendations that advances and expenditure should be kept separate from LA funds and retained in interest bearing accounts. In looking at the various practices within LAs we have identified differing practices which can have a range of positive and negative points. Whilst current guidance is clear that this should be the case, we need to consider this matter further.

3. Funding Allocation – changing the model

3.1. The current funding model for calculating allocations at national elections has been in place since 2009. It is a model that is based on a series of calculations and assumptions. It has remained largely unchanged in the four national polls it has been used for: 2009 EP Election, the 2010 UK General election, the 2011 referendum on the parliamentary voting system and the 2012 PCC elections.

3.2. A new system was introduced in 2009 following changes introduced by the Electoral Administration Act 2006 for UK Parliamentary elections which were applied to EP elections by the European Parliamentary Elections (Amendment) Regulations 2009. The aim of the regulations was to increase the transparency of the system and bring more openness and accuracy to the process, whilst giving ROs greater flexibility and removing what was seen by ROs and electoral administrators as inflexible central direction.

3.3. The most significant change of the 2009 funding model was to give flexibility to the RO and the amounts identified for each budgetary head could be under or over spent as long as the overall claim did not exceed the Maximum Recoverable Amount (MRA). The accompanying claims guidance document for ROs stated:

> "You are free to disburse funds on the different functions specified in the Charges Orders as you see fit, provided you account for the expenditure properly and only spend on what is necessary for the efficient and effective conduct of the election."[3]

3.4. That system is certainly more transparent than the previous model in terms of the data which has been collected. For the first time, we now have a series of comprehensive data sets that allows us to see how much was claimed against each item both at an individual level and within the context of a region or nationally. The flexibility within the system has also been welcomed by ROs and electoral administrators. However, it has raised some issues, particularly when the data is looked at in the context of providing funding for a national poll:

- It operates on a one-size-fits-all basis, with no account of region, how urban or rural an area might be or any other local factors which can have a significant influence on the cost of running an election (other than for Inner and Outer London where uplifts are given for location).

- In estimating the cost of national elections, we have been over-bidding for funds to run the poll from HMT. For example, at the 2009 EP and 2010 General elections the actual expenditure was approximately £10m less than allocated for the conduct of the polls and in the 2011 referendum, actual expenditure was around £5m million less than the amount received from HMT. On a macro scale,

[3] Ministry of Justice, Returning Officers' expenses guidance notes, European Elections 2009, p. 4

this incurs additional costs as HMT borrows this money from the markets and pays interest on the amount.

- The system was also built on baselining a number of key functions of running an election in order to calculate the correct amount for each area. In practice, and as has been shown by the analysis and data elsewhere in this paper, there are significant variances in the costs paid for some particular goods and services.

3.5. What this system has allowed us to do through the claims and scrutiny process, is work towards getting the 'right' amount of funding for each area. ROs have submitted their claims, ECU has approved some heads, queried others, and reduced some claims where appropriate to end up with a sum of money that should be appropriate for that poll in that area.

3.6. It is proposed that we use that data to calculate and allocate each voting area's allocation using **what was approved last time** as a basis to work from. This should drive the model to a more equitable system that takes into account differences between voting areas. The two main sets of data that will be taken into account are from the 2009 EP Election and the 2011 Referendum. This is because these polls used counting areas most closely resembling those to be used at the forthcoming 2014 EP elections, taking into account changes since then within boundaries and local authorities

3.7. At present, one of the main drivers of value for money comes through the scrutiny of claims after the poll. Significant savings have been driven between original claims, scrutiny and settlement due to the identification of inappropriate expenditure or spending more than the MRA. This proposed model would see a shift towards the transparency and subsequent analysis of data to providing a significant driver of value for money. Dependent on changes to the scrutiny process, these two approaches could then work in tandem to provide greater assurance in the funding process.

3.8. There are two illustrations of how this model would work in practice below and the allocation would also take into account what is proposed elsewhere in this paper:

- On printing costs (ballot papers) those that have significantly overspent the allocated amount at the last EP elections in 2009, will not be given what was actually approved last time but an assumption based amount. The aim is to drive these current outlying areas in terms of cost towards greater value for money.

- All areas will not be able to claim higher than their allocated amount for general clerical costs (J1). In particular, those areas that overspent this amount previously will be reminded that any additional expenditure they have in this area, must be allocated to one of the other heads, even if this isn't necessarily always the neatest fit. This will help accountability and transparency of these costs.

3.9. We are currently in the process of collecting data from Local Returning Officers (LROs) (co-ordinated through the Regional Returning Officers (RROs)) to gain an updated set of figures for electorate size, registered postal voters, number of permanent and temporary polling stations and details of any other scheduled local polls for 2014.

3.10. This repeats similar exercises that have run in the past for national polls. We wrote to the RROs on 10 July to collect this information. Even though we might be moving away from a model solely based on assumptions and calculations, it is still important to collect this information to help us identify some voting areas that have gone through significant change in the last few years (some early returns are showing a significant increase to the number of postal voters registered to vote). Collecting the data early also allows us to continue to work towards our aim of completing the Fees and Charges order within six months of the poll. This data is due back from LROs by 5 August.

3.11. It is proposed that this data will then be taken into account when drawing up funding allocations. For example, if an area has changed dramatically since the last poll with an increased number of polling stations or size of the electorate then appropriate allowances will need to be made for this in the "allocation based on what was approved last time" model to ensure a greater degree of equity in the system.

3.12. Questions for consideration

- Within the theory and context set out above, would this method of funding allocation cause any practical issues or problems within your area?
- Following the ECU scrutiny process, does the amount of money you received feel like the "right" amount for running that particular national poll? Too much? Too little?
- Are there other areas which you feel should be addressed in value for money terms, where the product is similar nationwide and it is straightforward to make comparisons from area to area?
- Are there any other external factors which you think drive costs that need to be considered in relation to transparency and value for money or in general?

3.13. Illustrative Examples – How the proposed change to calculating allocations would work

In order to calculate each area's overall funding allocation for the 2014 EP elections, we propose to use the most recent set of data from the last time the same areas were used – the EP elections held in 2009. The below table highlights some key figures from "Area A" (based on a real example), figures rounded to nearest £1,000/1,000.

AREA A – 2009 EP election data	Total
Overall Funding Allocation set out in Fees and Charges Order	**£211,000**
Total Amount in Original RO Claim	**£176,000**
Total Settlement Amount	**£171,000**
Under spend against Funding Allocation	**£40,000**
Number of Electors	**133,000**
Postal Voters in Counting Area	**12,200**

As has already been proposed within this paper, we are also examining outlying areas on their printing costs, where it is clear that better value for money can be achieved. In Area A, the overall printing costs were £35,300 against an original allocation of £18,000. The table below shows that Area A overspent against two of the three printing expenditure heads:

AREA A – Expenditure Head	Allocated Total	Settled Total	Individual Cost
F11 Printing Ballot Papers	**£6,900**	**£24,100**	**18.1p per ballot paper**
G4 Postal Vote Printing	**£7,600**	**£5,700**	**46.7 per postal voter**
H3 Poll Card Printing	**£3,500**	**£5,500**	**4.1p per poll card**

Therefore, as Area A has exceeded the proposed threshold (by significantly exceeding the average unit cost for this item expended by others regionally and nationally) for printing their ballot papers, then it is proposed they will not be given their actual approved expenditure for that poll, but that element of the allocation will be adjusted to include an assumption based amount, for example, **8p** per ballot paper in the calculations (amount to be finalised before Fees and Charges order) rather than the actual expenditure on ballot papers last time. We will engage with any area that has exceeded the printing thresholds to re-confirm previous costs over the summer. There will still remain flexibility within the system. For example, we know that some areas are tied into long term contracts at higher amounts that they will not be able to exit before next year's elections.

Overall, this means that Area A's funding allocation under these proposals are set out below. These are based on 2009 data on the number of electors and postal voters, revised figures (which we are currently in the process of collecting) would be used to calculate the final exact amount.

AREA A – 2014 European Parliamentary Election Proposed	Total
Total Settlement Amount in 2009	£171,000
Inflation	£18,000
Proposed total allocation in 2014	**£189,000**
Expenditure changes from "what was approved last time"	
Fixed F11 Printing Ballot Paper cost	**£10,600**
Fixed J1 General Clerical	**£6,600**

Area B

To contrast this example, Area B has a smaller electorate size and slight over spend on its allocated total.

AREA B – 2009 EP election data	Total
Overall Funding Allocation set out in Fees and Charges Order	**£46,000**
Total Amount in Original RO Claim	**£47,000**
Total Settlement Amount	**£46,000**
Over spend against Funding Allocation	**£1,000**
Number of Electors	**27,800**
Postal Voters in Counting Area	**2,500**

On printing costs, Area B, were well within the thresholds for postal vote and poll card printing but was significantly over on ballot papers (19.3 per paper). This means their proposed 2014 allocation would look like:

AREA B – 2014 European Parliamentary Election Proposed	Total
Total Settlement Amount in 2011	£46,000
Inflation	£5,000

Proposed total allocation in 2014	**£51,000**
Expenditure changes from “what was approved last time”	
Fixed F11 Printing Ballot Paper cost	**£2,200**
Fixed J1 General Clercial	**£1,390**

4. Printing – achieving value for money

4.1. Whilst undertaking analysis of the significant amount of claims data that has been provided by ROs to the ECU since 2009, it is clear that the spend for each area is variable and attributable to a number of factors which may have no consistency with other similar areas.

4.2. The funding review has identified one area in particular – printing – where there is little to differentiate between the actual products across the UK but the unit cost paid has varied widely. There are, of course, several other areas of expenditure to consider and we will move onto these in the next phase of the review and use analysis of further data to drive value for money.

4.3. The three heads of expenditure within the model that include printing are:

F11 – Printing Ballot Papers

G4 – Postal Vote Printing and Stationery

H3 – Poll Card Printing and Stationery

4.4. Ballot Papers - The claims expenses guidance to ROs sets out the estimated cost to print per ballot paper. This was from the 2009 EP elections expenses guidance:

"It is assumed that one ballot paper can be produced for 5 pence (or £5 for a hundred), though it is appreciated that such costs can vary from area to area."[4]

4.5. Analysis (below) shows that when the actual expenditure for 2009 EP elections was examined at a regional level the costs ranged from 6-8p – an acceptable range given the regional variation caveat. However, taking the analysis down to the next level of granularity at individual local authority level shows that costs ranged from 1p to 23p per ballot paper. This, in some cases, is over four times the allocated amount and clearly raises questions over achieving value for money.

4.6. Poll Card Printing - The position on Poll Card printing is positive. Guidance from the 2009 EP elections stated that:

'10.2 - The printing costs have been calculated by reference to costs recorded for previous elections, uprated for inflation. The basis for the calculation of poll card printing is: Average cost of £250 per 10,000 electors'[5]

4.7. Analysis from the 2009 and 2011 national polls, shows very few areas that could be described as outliers. 290 areas at the 2009 EP elections printed their poll cards for 3p each or less. Similar voting areas were used at the 2011 Referendum and again, there are only a few outliers to look into further with 372 areas where printing poll card costs where either the allocated 4p per card or less.

[4] Ministry of Justice, Returning Officers' expenses guidance notes European Elections 2009, p.34

[5] Ibid, p.45

4.8. It is **proposed to try to specifically tackle some of these outliers through the allocation of an assumption amount based on national spend rather than based on the actual spend in that area in the previous relevant poll.** We have specifically selected printing for this proposal because it is an area where the product is similar (although not identical) from region to region. We propose that for the 2014 EP elections, any individual area that has exceeded one of the below thresholds (based on historical data from the last EP election in 2009) will be subject to further scrutiny of their printing costs and instead of receiving what was approved actual expenditure from last time will receive an assumption based amount.

4.9. The revised amount will be factored into the overall allocation but will remain flexible in terms of expenditure. These changes are designed to drive value for money and thus we would not expect to see an RO spend the previously high unit cost again and seek to offset that with savings elsewhere. In fact that would lead to a further reduction in allocation next time round – although that would not be a reason not to find value for money savings elsewhere in any event if they were available. It is appreciated there are a large number of individual areas that are already working hard to make improvements in this area and the proposals at this stage are looking to tackle outliers ahead of the EP elections next year.

4.10. As part of the phased approach of change, data from the 2012 PCC election and the 2014 EP election will be reviewed and analysed to help inform further change for national elections in 2015 and beyond.

4.11. It is appreciated that simply examining the data in combination with the thresholds will not be sufficient for a thorough analysis from which to draw future conclusions of each area's allocations. In conjunction with this stakeholder consultation, we will be reviewing the individual claims that would be described as outliers and getting in touch with them to verify what we have found. We have already learned from our initial analysis that there are a number of reasons that might trigger particular one off high costs, for example, paying for a complete reprint of all ballot papers due to an error in the original proofing of the draft. There are other reasons for these high costs such as a LA being tied into a fixed price, long term contracts and we would welcome any views as to region or area specific reasons why costs might be higher.

4.12. We are also conscious that the ballot paper for EP elections is usually more expensive than at other polls as the actual paper itself is longer due to a higher number of candidates that need to be included on the paper itself. We have spoken to both ROs and informally with suppliers to propose a realistic idea of an average amount that ballot papers could be printed for - that figure will be included in considerations with previous expenditure to ensure that the 'assumption amount' where used is realistic.

4.13. The table on the next page sets out the range of ballot paper costs and the number of ROs that paid that particular price for printing at the 2009 EP elections and 2011 referendum.

4.14. **Questions for consideration**

- What considerations are made when selecting a supplier to provide these services at a national poll?
- Are there other areas of procurement of goods or services that are common across all areas that could be examined to drive further value for money?
- Are there any problems in changing suppliers in order to gain a more competitive deal, for example is the local authority tied into a long term contract?
- Are there any region specific factors that influence higher costs that we have not considered as part of our thinking so far?

4.15.Printing Analysis

Cost per Printed Ballot Paper at 2009 EP elections and 2011 Referendum and the number of ROs that paid that cost

European Parliamentary Election 2009		Referendum on Parliamentary Voting System 2011	
Cost per ballot paper	**No. of Areas**	**Cost per ballot paper**	**No. of Areas**
20p+	3	20p+	1
17p – 19p	12	17p – 19p	1
14p – 16p	42	14p – 16p	5
11p – 13p	64	11p – 13p	18
8p – 10p	83	8p – 10p	55
5p – 7p	102	5p – 7p	205
1-4p	57	1-4p	154

Cost per Poll Card Printed at 2009 EP elections and 2011 Referendum and the number of ROs that paid that cost

European Parliamentary Election 2009		Referendum on Parliamentary Voting System 2011	
Cost per poll card	**No. of Areas**	**Cost per poll card**	**No. of Areas**
12p +	1	12p +	10
10p – 11p	4	10p – 11p	8
8p – 9p	7	8p – 9p	5
6p – 7p	10	6p – 7p	7
4p – 5p	47	4p – 5p	29
1p – 3p	290	1p – 3p	372

5. The future of the General Clerical (J1) expenditure head

5.1. For the last four national polls, the funding model has made an allocation for 'general clerical' costs for each RO. In the 2009 EP elections ROs expenses guidance, the definition of what could be claimed under this head was set out as:

"12.3 The costs are intended to cover all the general clerical costs associated with the European election which are not already covered elsewhere in the accounts. These might include clerical costs in relation to issuing notices, responding to queries from electors, dealing with correspondence specific to the election, overtime and so on. If it is possible to attribute activities to other heads of expenditure (polling stations, postal voting, poll cards or the count), you should do so."[6]

5.2. The method for calculating what this amount would be for each area was worked out as follows:

2009 European Parliamentary Election	Average cost per 10,000 electors of £500
2010 UK General Election	Average cost per 10,000 electors of £500
2011 Referendum on Parliamentary Voting System	Cost per elector of 5p
2012 Police Crime Commissioner Election	Cost per elector of 5p

5.3. Working on the basis of these calculations, a RO with an electorate population of 70,000 should be claiming no more than £3,500. Even for a much larger population, for example, an area of 150,000 electors, the allocated amount equates to £7,500. From the data available between 2009 and 2011, the overall general clerical claim at national level at each election has been greater than the original total amount allocated in the respective Fees and Charges order.

5.4. It is therefore difficult to tally and understand the huge variances in the amount claimed under this head in recent national polls (see next page for data and graphs). Some claims that are reflecting significantly more than the allocation for general clerical are actually significantly underspent in other areas, so when the claim is reviewed in the round, the claim is underspent overall and therefore approved and settled. However the overspends can be extremely large (more than twice / £30K above the allocation) and the items recorded are not transparent. In some instances, the general clerical head seems to be used to record expenditure without any consideration of it being appropriate to another head.

[6] Ibid, p. 57

5.5. As it is clear that each RO takes a different approach to expenditure in this area, **<u>we propose to make a number of changes in respect of this head of expenditure</u>**:

- To make this head a fixed amount, with no flexibility for over spending. For example, if the allocation is £3,500, no more than that can be claimed.
- Costs that would have previously have been claimed under this head, will have to be moved to one of the other expenditure heads (for example recorded under polling stations, poll card, count etc). It is appreciated that this is not always easy to allocate against but it will make it far easier to analyse this expenditure (between £2-3m UK wide) and identify the true costs of other elements of a poll.

5.6. Whilst by no means a universal issue, we have also had cause for concern in this area from anecdotal feedback from some stakeholders that this expenditure head is seen by some people as being for "staff bonus payments" and that it is "simply divided up and given to staff working on the election". Whatever the reality of this, it is obviously not something that we can ignore and we are keen to drive transparency in payments that are made. Clearly if this is being said, we need to have more transparent reporting for the future.

5.7. It should be noted that a number of ROs are claiming significantly under the general clerical allocation as well. The following table shows how the split of overspends and underspends maps out.

2009 EP elections – J1 General Clerical spend		**2010 General election – J1 General Clerical spend**	
	Number of Voting Areas		**Number of Constituencies**
Underspent	186	Underspent	250
Overspent	172	Overspent	308
Within £10 of allocation	9	Within £10 of allocation	15

5.8. The aim of the above proposed changes is to increase transparency, clarify what can and can't be claimed in this area and analyse where the monies for this head are reallocated to following the 2014 EP elections. From that data set it will be easier to work out if the allocations are currently incorrect and an increase to some heads and decrease to others might be necessary.

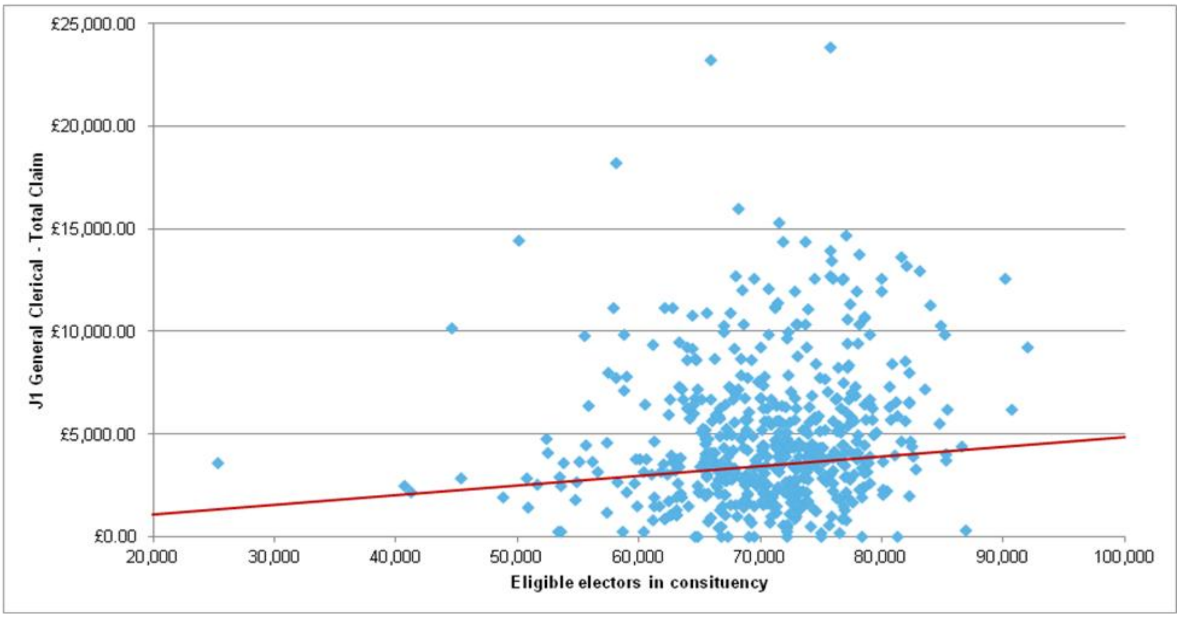
5.9. **<u>Questions for consideration</u>**

- What do you use the general clerical (J1) head for?

- What practical impacts on the running of the election would the above changes cause?
- Do you have a local election equivalent of this expenditure head and how does it work?

5.10. J1 General Clerical Analysis of Claims

The graph below shows the level of General Clerical claims made at the 2010 UK General election. Each plot represents a constituency. The red line is the allocated amount, based on the funding assumption of 5p per elector. For example, a constituency of 80,000 electors equates to a general clerical allocation of £4,000. Each plot above the red line indicates an over spend.



This issue has also arisen at other national elections, such as the 2009 EP election. Below are the highest 10 general clerical claims and their original allocated amounts. The right hand column shows that 9 out of 10 areas underspent their overall claim against funding allocation.

Area	Total Claimed (J1) (rounded to nearest £1,000)	Total Allocation in Fees & Charges (J1) (rounded to nearest £1,000)	Overall total settled amount, over or under spent against allocation (rounded to nearest £1,000)
1	£56,000	£20,000	Under £320,000
2	£53,000	£17,000	Under £99,000
3	£52,000	£36,000	Under £10,000

4	£37,000	£17,000	Under £16,000
5	£34,000	£27,000	Under £155,000
6	£33,000	£8,000	Under £62,000
7	£32,000	£11,000	Under £84,000
8	£30,000	£11,000	Over £9,000
9	£26,000	£8,000	Under £30,000
10	£24,000	£15,000	Under £15,000

6. Moving the Deadline for Claims Submission

6.1. At the last EP elections in 2009, ROs were given twelve months from the date of the poll to complete and submit their expenses claim. The same time timescale was set for the 2010 General election before the deadline was shortened for the two most recent national polls to **eight** months – the referendum in May 2011 and the PCC elections held in November 2012.

6.2. The shorter deadlines were introduced in order to add greater efficiencies to the process and to prevent any unnecessary delays to claims being received. A shorter period for submitting claims is also designed to fit in with the wider electoral timetable and to ensure that ROs and electoral administrators are not embroiled in issues with past claims when preparing for up and coming polls. We must also take into account the need for Government accounts to be settled within a timely period, with expenditure reported upon within a financial year if possible.

6.3. The Electoral Commission included within its report on the costs of running the referendum its own findings into how the change from twelve months to eight months made an impact. 64% of claims arrived within five weeks of the submission deadline and 22% arrived on the deadline date or after (the other 14% arrived more than five weeks before the deadline). As with other national polls, there was still a period of chasing up the outstanding claims after the deadline, but it was thought better to do this with an eight month deadline than a year long one. The Commission also analysed the claims that arrived on or after the deadline in more detail:

> "3.22 When we looked at these claims more closely, it appeared from the dates of documents, etc. that in a number of cases all the material included in the claim had been available well before the claim was actually submitted."[7]

6.4. The evidence that we have been repeatedly told that takes longest long time to obtain is invoices etc for internal recharges between different areas of a local authority (this was both in the Commission's report and has been told to us by a number of administrators). Given that ROs are usually senior figures within their local authority, it would be hoped that this should not be an issue and that evidence could be available at an earlier stage. More recently, we have heard that obtaining invoices and receipts from smaller external organisations (such as a church where a polling station is situated) is also an issue. We are open to suggestions as to how to tackle this problem and there may be some good practice that can be promulgated amongst administrators.

[7] The Electoral Commission, Costs of the May 2011 referendum on the UK Parliamentary voting system, December 2012, p. 40 www.electoralcommission.org.uk/ .../Costs-of-UK-May-2011-UKPVS-referendum.pdf

6.5. The Commission recommended that the option of moving the deadline from eight to **six** months be looked at:

> "3.23 If the slow provision of local authority recharge information can be addressed, then it appears that the deadline could be reduced to six months, which would mean the reimbursement process could be speeded up further."[8]

6.6. From our initial discussions with stakeholders so far there have been no significant difficulties raised from the suggestion of the deadline being changed to six months, with some administrators actively suggesting that they would welcome this move as it would act as an incentive to get the claim dealt with as quickly as possible. This change could also link into the following proposal around the scrutiny of claims, with some stakeholders stating that if they had to provide details of election costs but not link them to every single receipt or invoice, they could potentially submit the claim much earlier than they do and in advance of a six month period.

6.7. A proposed six month deadline could be a better fit with the financial year – particularly for scheduled polls that take place in May or June - and the necessary reporting that goes with it for ROs, LAs and the Government. Even for claims where there are queries, it is more realistic that they will be settled and completed by the end of the financial year than with an eight month deadline.

6.8. It is **proposed that the deadline for submission of ROs expenses claims for the 2014 EP elections is six months** from the polling date and would be **22 November 2014**.

6.9. Questions for consideration

- In recent national polls, what have been the barriers preventing an early submission of the claim? In particular, what causes the delays around obtaining internal local authority recharges?
- Are there any practical problems you envisage with completing and submitting the claim within six months?
- Does your Electoral Management System (EMS) have the capability to record and provide details of costs? If so, do you make use of it?
- For the PCC elections, have you made use of a book-keeper to help prepare your claim? (This was an allowance that the Home Office stated they would consider paying (under J4 materials and services) within the expenses guidance.

6.10. If the date was to move to a six month deadline, Cabinet Office would review the evidence of when claims where submitted from the 2014 EP Elections to help shape a decision on whether the 2015 General election and future national polls should have the same time period for claims submission.

[8] Ibid, page 41

7. The Scrutiny Process

7.1. Day to day operational responsibility for the scrutiny of election claims and the reimbursement process is managed by the ECU. ECU sits within the DCLG's Finance and Shared Services Division and is contracted by Cabinet Office to process election claims at national polls. The unit processes and scrutinises election claims as part of its case management role and works with local authorities to resolve any costs variances before the claims are settled and paid out. It is this data that has been collected and collated by ECU which has allowed us to undertake this review and detailed analysis of claims for the first time ECU has also worked in the same way on behalf of the Electoral Commission for the 2011 referendum and for the Home Office for last year's PCC elections.

7.2. The current scrutiny process has divided opinion. There is clearly a link between the length of time it takes for claims to be settled and the amount of scrutiny and assurance that has gone into looking at RO expenses claims at national polls since 2009. From initial conversations with stakeholders, there are two headline messages which have emerged so far:

(i) From the administrative perspective of ROs and their election teams, the process is too onerous and not proportionate. ROs, often also Chief Executives at a LA, are required to approve and verify expenditure to a very granular level when in their substantive jobs they are often dealing with significant sums for other purposes without having to report at this level. In comparison, the scrutiny and verification process can feel burdensome.

(ii) From a central Government perspective, the statistics show that the scrutiny process, administered by the ECU is cost effective. The table below shows the administration cost of running ECU versus the amount they have claimed back between claims and final settlement.

Year	Poll	ECU Cost	Difference between original claim total and final settlement total
2009	European Parliamentary Elections	£280,000	£400,000
2010	UK General election	£350,000	£887,000
2011	Referendum on the Parliamentary Voting System	£450,000	£730,000

7.3. Our aim is to find a balance that is both proportionate and fair but continues to provide an appropriate degree of scrutiny to the areas that need it. Any changes to the scrutiny approach need to be carefully considered against the current systems and processes that are in place. As previously mentioned, this review is initially about making relevant changes that will not have a substantive impact on the smooth running of elections whilst still ensuring transparency and a greater focus on value for money. Over a longer period and at elections beyond the 2014 EP elections, additional changes can be implemented, backed up by the evidence of further claims data. On this basis, it would not be wise to simply remove the scrutiny process altogether.

7.4. We are proposing that claims are considered in future under the provisions set out below:

i. Claims from areas where there have been issues at previous polls since the 2009 EP elections to be subject to scrutiny in the same way as the last few polls via the ECU. This includes:

   a. Areas that have previously exceeded their Maximum Recoverable Amount (MRA)

   b. Areas where there have been recurring problems in claiming for items that are not allowable under the guidance

   c. Areas that have had their claim significantly adjusted through the ECU scrutiny process. This will be calculated by working out the percentage difference between the claim amount and the settlement amount (using 2009 EP election figures), if adjusted down by more than 10% it will be included.

   d. An additional small random sample of claims

ii. In areas where no previous issues have been identified with claims a revised system could be introduced whereby:

   (a) Headline expenditure amounts will need to be provided against each head but ROs will not need to submit 100% of all accompanying vouchers, invoices and receipts. This will ensure that the Cabinet Office has the data on actual expenditure to measure whether the overall allocation process has been accurate and we continue to give ROs the right amount.

   (b) ROs will need to provide the Cabinet Office with a signed statement of assurance which sets out various specifics such as: (i) how the number of staff required for the poll has been identified (ii) how the rates of pay for these staff have been calculated and (iii) the mechanisms which are in place to ensure that staff are paid correctly (for example, monitoring time sheets etc.)

   (c) ECU will ask for a sample of hard copy invoices to be provided – for example, any for amounts of £5k or over. This idea would also ensure that all ROs are required to provide at least some form of evidence.

iii. Regardless of previous claims history, any 2014 EP election claim that exceeds the Maximum Recoverable Amount (MRA) will be subject to the full ECU scrutiny (option 1).

7.5. This is a proposal with very much a long term, continuous improvement aim. If following the 2014 EP elections, the claims data comes in on time, correctly and with fewer queries and overspent areas that will act as a catalyst for reducing the numbers of claims that need to go through the full scrutiny process next time at the General election in 2015 and the subsequent 2016 PCC elections.

7.6. <u>Questions for consideration</u>

- What are the most time-consuming aspects of completing and settling the claim at present?
- What do you think of the above outlined 3 options for scrutiny at the 2014 EP polls?
- Are there are other aspects of the full scrutiny process that could be removed or are unnecessary without adding value to the process?
- If you were one of the voting areas that did not have to provide 100% of your invoices, receipts and vouchers, within what time period could you submit your claim?

8. Fees and Payments to ROs and their staff

8.1. We are keen to better understand how monies are used to pay RO fees and make payments to staff in order to further consider how funding should be allocated in the future. The Cabinet Office receives regular enquiries as to how those running elections are remunerated, including from Parliament and we are keen to ensure there is clarity over payments made.

8.2. The transparency of the cost of running an election is an area which should be examined and improved. The public sector, both Government and LAs, have made significant efforts to demonstrate greater transparency and have become increasingly open about sharing data.

8.3. Examples of the kind of data that have been made available include:

- Organisation wide organograms released
- Senior Leaders and Management salaries disclosed
- All items of expenditure over £500 published on a quarterly basis
- Business plans and regular progress updates against them

8.4. ROs are paid a fee to reflect their statutory responsibility for the effective running of a poll. The fee represents their personal responsibility for delivery of the poll and liability to legal action in the event of issues arising, regardless of the appointment or delegation of duties to deputies. This possibility is understood and planned for through the provision of either insurance or indemnities (or a mixture of the two) to cover claims against the RO.

8.5. The fee for the Returning Officer at the 2009 EP elections was calculated as follows:

- The Regional Returning Officer (RRO) received a flat fee of £12,000.
- The Local Returning Officer (LRO) received £450 for every 10,000 electors.
- The LRO fee would be increased by 20% if the election was combined.
- London LROs received more, 25% more for inner London boroughs and 20% more for outer London boroughs.

8.6. The LRO rates remained the same for the subsequent 2010 UK General election, the referendum on the parliamentary voting system in 2011 and the PCC elections last year. For the upper tier positions of Regional Counting Officer (RCO) for the 2011 referendum the fee was matched to RRO levels - £12,000 and for the 2012 PCC elections, Police Area Counting Officers (PAROs) the fee was £8,000. These amounts cannot be exceeded and there is no flexibility to claim more as there is with other areas of expenditure.

8.7. During initial meetings with stakeholders so far we have learnt that the fee is not always solely taken by the RO. Some of the alternatives include:

- The fee is not taken at all
- The fee is taken and distributed to/between appointed Deputy Returning Officer(s)
- The fee is taken and distributed amongst the elections team more widely
- The fee is added to the monies made available for charges and claimable costs (drawn from other heads of expenditure) and distributed amongst deputies and election team members.

8.8. There is no defined way in law for these monies to be distributed, although adding the fee to the other monies and distributing it rather than taking it as a fee is not something that we support in terms of the claims process. The most recent guidance documentation for the PCC elections in November 2012 set out that:

"7.2 The usual practice is for Returning Officers to appoint deputies to act on their behalf and in those circumstances the Returning Officer may allocate all or part of his personal fee to any deputies."[9]

8.9. In order to provide greater transparency, it is proposed that for the 2014 EP elections, each RO will provide information on how their fee is taken and distributed, alongside a brief explanation of how that decision was taken. Cabinet Office will collate and analyse the data in further detail to further understand how the allocation of payments to staff could be improved to add transparency.

8.10. In addition to the variances in approach to distributing the ROs fees and how each area procures its goods and services to run the election, the other significant area in which there is a wide variety of views and approaches is payments to staff.

8.11. Legislation for national polls such as the UK Parliamentary general election and the EP elections is predicated on the premise that the local authority makes its resources available to the RO to help run the election. This policy theory is long-standing and based on our dispersed system of delivery for polls in the UK. LAs, as public bodies with a role in serving their communities, have traditionally undertaken the role of organising and delivering polls utilising staff and resources provided at public expense.

8.12. This commitment is being fulfilled in general terms but from our initial analysis and conversations with stakeholders there are some variances that we have identified:

[9] Home Office, Police and Crime Commissioner elections Police Area Returning Officers and Local Returning Officers Expenses Guidance Notes, November 2012, p. 38

https://www.gov.uk/government/publications/returning-officers-expenses-guidance

- Differentials in approach in making staff resources available. Some ROs use all or mainly internal LA staff for the running of polls whilst others bring people in to a large extent. Often these are ex-LA staff with experience of helping to run elections in the past.

- Differential in approach to how payments to staff (usually those not working within a dedicated registration /elections team) are dealt with, including:

    - Staff receiving payment from the RO for elections work and continuing to receive their normal salary payment

    - Staff receiving payment from the RO for elections work but having to use annual leave for absence from their usual job

    - Staff receiving payment from the RO for elections work but having to take unpaid leave

    - Staff receive payment from the RO for elections work and continuing to receive their normal salary payment plus getting time off in lieu

We are keen to understand these differences, and whilst salary payments and leave requirements within the LA are a matter for that authority, identify if they have any current or future impacts for the funding of national polls.

8.13. Payments to staff who work on registration and elections as all or part of their allocated duties are also inconsistent. Some areas have schedules of 'fees' for such officers who manage postal vote issue and opening, inspect polling stations and mange the count and others do not. Some regard work during office hours on national elections as part of their job whilst others argue it is not and should be separately reimbursed. In some cases work on national polls seems to be undertaken outside of office hours as and when necessary whilst others seem to plan the work for that time. Again, we need to understand why these differences arise and have clarity and transparency in how and why payments are made. Different ROs will have differing dedicated 'elections' resource availability and we understand the need to have experienced and reliable staff available and effectively reimbursed for additional hours worked but there is a need to have consistency in what is covered by the funding and how any payments are calculated.

8.14. The role of 'deputies' also needs further investigation. ROs usually appoint Deputies – ostensibly to take their place should they be unable to undertake their duties for some reason. In reality (and understandably given ROs' positions as senior officials of local authorities), deputies are often used to actually prepare for and run the poll and many are allocated 'full powers' to act for the RO. As such they are often, but not always, undertaking the RO's role. Current policy is that there is no allocation of monies to pay deputies and that, in undertaking the RO's duties, they can be paid monies from the RO fee for doing so. To pay a separate fee for deputies (acting in that capacity) could be regarded as funding that work twice. This again, is and area of consideration for the future and the data on how RO fees are utilised will assist in understanding how this is to be approached for the future.

8.15. <u>Questions for Consideration:</u> In order to consider all these issues under fees and payments to staff, in further detail it would be helpful to have your responses to the following questions:

- How is the RO fee allocated in your area? Do you run the same model at local elections?
- Do you propose to change that allocation or process for the 2014 EP elections?
- How are staff reimbursed in your area?
- Is there a 'scale of fees' for particular duties? If not, how are payments calculated?
- Do you structure the work on national elections in a particular manner (e.g. to take place out of office hours)? If so, what are the drivers for that (e.g. availability of staff resources / split of duties with other LA roles)?
- If, as recommended by the Electoral Commission, granular claims data including staff payments were to be published in the future, would that lead to any practical issues or sensitivities?
- Do you feel the level of the Returning Officer fee is fair?

9. Guidance

9.1. The role of guidance has been repeatedly raised throughout our discussions with ROs and administrators. In particular, they are looking for clarity in what is and is not permitted in terms of expenditure and in respect of how claims are to be completed and aspects of running a poll, accounted for in terms of costs.

9.2. For 2009, significant work was put into revising the forms for completion, including promoting the use of electronic forms, and updating the guidance. This process including taking more account of how IT plays a role in supporting today's elections (for example, in the payments towards licences in relevant years) and seeking to create more transparency on costs so that they could be effectively analysed – which takes us back to the start of this paper.

9.3. We are conscious of the need to revise the guidance to take account of the learning over the past 4 years and to seek to drive greater clarity for how expenditure is recorded in looking at the forms. We will undertake this work, in conjunction with colleagues in ECU and LAs over the next few months whilst further analysing the previous claims to calculate the MRAs for May 2014.

Questions

- What changes need to be made to the guidance to assist you?
- What areas do you feel unclear / uncertain about when committing expenditure / completing the claim and would be assisted by additional information in the guidance?

10. Overview

10.1. This paper is based upon considerations and feedback that has been collated over the period since the current funding system was introduced in 2009. Having utilised the process over four major polls and learned from the positive elements and areas identified as issues, we now think the time is right to make changes based on that input and the attendant analysis of the data but are also keen to have view on the proposals put forward in this paper.

10.2. The proposals aim for a leaner funding allocation and claims process, utilising hard data in the basis of allocations and seeking to address the issues with the detail and complexity of the claims process. In the proposed changes we are seeking to take the positives from the current system such as the flexibility of expenditure within the overall allocation and address the issues such as extensive scrutiny and missed deadlines for submission of claims. We are aiming to produce a balance that achieves less scrutiny whilst retaining the necessary rigour to ensure public money is spent carefully with accountability. This will need all relevant parties to buy in to the changes taken forward and ensure we have accurate and transparent reporting of costs that will support a more streamlined process.

11. Next Steps

11.1. This paper has set out a number of proposals for possible change to take effect for the 2014 EP elections. Following this short consultation and further meetings with stakeholders and subsequent Ministerial consideration, we may implement these changes now or on a different time track to take effect at future national polls.

11.2. We are keen to hear views on any of the questions or areas raised within this paper, plus any matters you think we have missed so far or would benefit from considering. We would also be happy to speak to anyone with views and have already received a number of invitations to speak at AEA branch meetings in September. We are happy to receive input by email, over the telephone or at any meetings that we attend.

11.3. Please send your responses to this paper to roy.williams@cabinet-office.gsi.gov.uk by **6 September 2013**. Roy can also be contacted on 020 7271 2757.

The information you send may need to be passed to colleagues within, or working on behalf of, the Cabinet Office or other government departments and may be published in full or in a summary of responses.

All information in responses, including personal information, may also be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004). If you want your response to remain private, you should explain why confidentiality is necessary and your request will be acceded to only if it is appropriate in the circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the department. Contributions to the consultation will be anonymised if they are quoted. Individual contributions will not be acknowledged unless specifically requested.