

# THE ELECTORAL MANAGEMENT BOARD FOR SCOTLAND (EMB)

## Annual Report 2021/22

*“...to deliver a result that will be trusted as accurate”*

**January 2023**

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## Foreword by the Convener of the Board

The Board's Annual Report for 2021/22 has a focus on both the preparation for and delivery of the Scottish Local Government Elections on 5 May 2022. All Elections have their complexities and demands, all within a context of immovable deadlines, but this set of polls was particularly challenging. Scotland was emerging at last from the restrictions imposed by the pandemic, a process even now not wholly complete, and accordingly planning, preparation and delivery was undertaken in a volatile environment in which there was great uncertainty as to the manner of delivery of the Elections and the level of restrictions that might be required.

It is a testament to the hard work, dedication and creativity of Returning Officers, Electoral Registration Officers and their staff across the country that the Elections were conducted successfully and professionally. Results were delivered to the scheduled time scales with no concerns about the conduct of the Elections and no challenges to the results. But there were many challenges along the path to that favourable outcome, some of which were issues of which we have been aware for several years, particularly the problems of delivering elections with limited resources and a reducing pool of election staff. The resource pressures were amplified for this period due to COVID with a greater number of staff unwilling or unable to undertake election work.

As we look to the future the EMB will be working with ROs and EROs to try to address these resource issues and will continue to engage with Scottish and UK Governments which have responsibility for setting the legislative framework in which we administer elections.

This report looks back on a difficult year but with satisfaction and pride in Scotland's electoral community - a body of professionals who once again ensured that elections were delivered to a high standard despite severe challenges. Looking ahead we face significant legislative change, particularly for UK Elections, and the EMB will once again be called on to assist ROs and EROs to adapt to those changes while constrained by the limited resources of the electoral community and Councils which support it. I have – on good grounds - confidence in the commitment of that community but there needs to be a wider recognition of the ongoing pressures that are faced by those looking to deliver the democratic process to the people of Scotland.

**Malcolm Burr**

Convener of the Electoral Management Board for Scotland

## Strategic Highlights: Delivering Elections in 2021/22

This report covers the financial year 2021/22 leading up to the delivery of the Scottish Local Government Elections on 5 May 2022 and includes for completeness commentary on the administration of these Elections. Strategically during the period the EMB was operating in a context still dominated by the COVID Pandemic and the impact of measures taken in reaction to it. The same period thankfully saw the reduction of these restrictions, with the happy position that by the time of the Scottish Local Government Elections on 5 May 2022 there were no restrictions in force.

### Moving on from the Pandemic

By the point at which RO teams were dealing with the key delivery elements of the 2022 Elections - nominations, polling, postal voting and the count - the broad Coronavirus restrictions had been lifted and there were no requirements for social distancing or the wearing of face-coverings. However, in the planning/preparation period leading up to the Elections the conditions were volatile, with significant uncertainty remaining as to the degree of restrictions that might be in place at polling and the counts. Plans at a national and local level had therefore to include contingencies to cater for measures that may have been introduced, primarily in terms of social distancing and the consequences for both polling and the count.

The Supplementary Guidance that had been produced by the EMB to support the delivery of the Scottish Parliament Election in May 2021 was reviewed and revised to inform the planning for the May 2022 polls, with input from PHS and Health and Safety advisers from Glasgow City Council.

While the enhanced measures around physical distancing, occupancy limits on polling stations and the use of Perspex screens were not deemed necessary some ROs chose to retain them to provide a degree of reassurance to voters, staff and candidates. Although restrictions were not in force at the time of the election, Covid continued to have an impact with large numbers of polling and count staff withdrawing from duty due to a positive test, or because of caution about the risks of the role.

### Limited Local Government Resources

A further key context for this period – and future elections - was the pressure on resources available to deliver the Elections. Previous Annual Reports and reviews of the delivery of recent polls have identified concerns as to the capacity of, and pressures on, the local government resource which is essential to deliver all elections in Scotland. While elections are the individual responsibility of the Returning Officers, they rely on the resources of Scotland's Councils to plan, prepare and deliver each election. However over recent years the resources at the disposal of local authorities have been eroded, particularly in the corporate service which provide the bulk of the support staff available to Returning Officers.

Returning Officers and their teams have repeatedly observed that it has become increasingly difficult to deliver elections with the reducing resources at their disposal. The 5 May 2022 Elections were no different, with the EMB noting concerns about the resilience of several Election Teams which struggled at times to resource the Elections as they would have wished. The basic underlying capacity of Councils to plan, prepare and administer elections is now much weakened and in the light of the designation of elections as fundamental national infrastructure their resilience should be a national concern.

## Operating Highlights

### Scottish Local Government Elections 5 May 2022

While outwith the financial year, the major work of the EMB during the period of this report was the planning of and preparation for the delivery of the Scottish Local Government Elections, held on 5 May 2022, for the election of 1226 councillors across 355 wards in our 32 Councils. The EMB activity to coordinate the delivery of the elections, promoting best practice, as required by the Electoral Administration Scotland Act (2011) covered what has become the standard programme of briefings, the issue of support materials and the directions given to ROs and EROs.

### eCount Project

Since the introduction of STV in council elections in Scotland in 2007 votes have been counted electronically for all ordinary elections. The management of the eCount project for the 32 councils is a major workstream of activity. Covering a period of over 3 years, the project oversaw the procurement of the eCount system, its development and testing and the implementation across the 32 local authorities. This work was overseen by a discrete Project Board chaired by the Convener of the EMB with the contract operated and managed on behalf of the Returning Officers by the Scottish Government.

### Preparation Seminar

A joint seminar with the Electoral Commission was held on 27 January 2022 for ROs and EROs to support their planning for the 5 May Elections. The format consisted of a series of presentations followed by discussion among the ROs/EROs covering the key operational challenges of the Elections, especially given the challenging strategic context, due to the pandemic, as described above. The Seminar included a section focussed on accessibility issues with input from voters with disabilities because of which many RO teams revised their approach to dealing with accessibility issues, with positive feedback from voters as a result.

### Directions

To provide a consistency in key voter facing elements of the Elections and ensure adequate contingency planning, the Convener of the EMB made several Directions to ROs and EROs, as has become the standard practice for the EMB for all recent electoral events. Following formal consultation, as required by law, within the EMB and with the Electoral Commission these Directions were issued on 5 November 2021, 6 months ahead of the election. The Directions can be found on the EMB website at <https://www.emb.scot/downloads/file/851/directions-to-ros-and-eros-from-the-convener-of-the-emb-4-november-2021>

### Partnership with Public Health Scotland (PHS)

Throughout the planning of and preparation for the elections EMB representatives met with the consultants from Public Health Scotland (PHS) who were responsible for the production of workplace guidance around the control of Coronavirus. This allowed ongoing review of all proposed activities across nominations, postal vote processing, polling and the count to ensure that these would be conducted in a safe manner given the prevailing and changing public health situation. PHS were also able to provide advice on specific queries where necessary to support individual RO teams.

### Partnership with Police Scotland

As at all recent electoral events in Scotland the EMB worked closely with Police Scotland to advise and inform their planning for their support for the elections. In partnership with the Electoral Commission and the ERC of the SAA (representing the EROs) the EMB briefed all Police SPOCs (Single Points of Contact – the lead police officers allocated to liaise with each Council) at a national event on 10 February 2022. The EMB and Electoral Commission also held monthly meetings with the Silver Command for Police Scotland and were included in their national monitoring activity through polling day to provide operational input where needed.

### Liaison with Royal Mail

Following the successful delivery of the May 2021 polls the same protocol was applied for these Local Government Elections with regular meetings held between Royal Mail and EMB representatives to monitor activity at key points in the election timetable so that any issues could be identified, addressed and resolved. As in 2021 this was a successful approach allowing any problems to be identified and resolved quickly without impacting voters.

### Scottish Parliament Political Parties Panel (SP PPP)

The EMB engaged with the political parties represented in the Scottish Parliament through the SP PPP, to ensure that there was effective and timely communication around all elements of election preparation and planning, including the directions issued by the Convener.

### Detailed reports on the May 2022 election

A full analysis of results is available from the EMB website at

<https://www.emb.scot/news/article/50/scottish-local-government-results-2022-analysis>

Feedback from stakeholders and the formal report from the Electoral Commission indicated that the Elections of 5 May 2022 were managed well with results that were accepted by all. The Electoral Commission found that *“the vast majority of voters (97%) were satisfied with the process of voting; Almost everyone who voted was able to use their preferred method and found it easy to fill in their ballot paper. Polling station voters felt confident that they could vote safely in person”*. No concerns about process or integrity were reported.

With respect to registration, the Electoral Commission found that *“82% of respondents said they were satisfied with the process of registering to vote. .... Of the 10% of respondents who expressed dissatisfaction with the process, the main reason given was that they thought voter registration should be automatic (32%) or that it should be compulsory (23%).”*

Broad feedback from candidates, agents, media, and voters was that the Elections were professionally and effectively delivered in what continued to be challenging circumstances due to the aftermath of the pandemic. The successful conduct of the Election was only possible due to immense effort of RO and ERO staff and the support of many different stakeholders across the councils, Police Scotland, Public Health Scotland, the Electoral Commission and others.

Several actions have been identified for the future to ensure that lessons from this event can inform the conduct of future elections in Scotland. These include:

- A review of the design of nomination papers to support candidates in accurately completing their paperwork;
- A review of public awareness activity to minimise the number of rejected votes at polling places and via postal voting; and
- A review of resourcing – especially staffing – given pressures on local government resources and increasing difficulties in the recruitment of staff.

The Electoral Commission also noted that “*while the level of spoilt ballots across Scotland has declined since the 2017 council elections, they increased in some wards; further action is needed to address this.*”

The Electoral Commission’s own Report on the May 2022 Scottish council elections is available from their website at <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/past-elections-and-referendums/scotland-local-council-elections/report-may-2022-scottish-council-elections>

With respect to the work of the EMB, it noted that:

The Electoral Management Board continued to support consistency in the delivery of elections

*The Electoral Management Board (EMB) has statutory responsibility for supporting the delivery of council elections in Scotland, including a power to direct Returning Officers and Electoral Registration Officers in respect of their duties at these elections.*

*Directions issued by the Convener of the EMB at this election (Opens in new window) included timings for the dispatch of poll cards and postal votes and also for counts.*

*Electoral administrators and the wider electoral community continue to value the role that the EMB plays in providing support and advice for the delivery of local elections.*

*“Directions of the Convener of EMB invariably helpful and well timed.”*

*“Everything worked well. Directions were helpful without being overly prescriptive or heavy-handed.”*

The EMB’s review identifying lessons from the delivery of the election is available at <https://www.emb.scot/downloads/file/991/emb-review-of-the-2022-scottish-local-government-elections> . The lessons identified are forming part of the EMB’s work programme for the coming year.

## Engagement with Governments

During the period of the report the EMB has continued to engage with Scottish and UK Governments on the development of and implementation of new electoral legislation.

### Scottish Government

The EMB has continued to advise Scottish Ministers and the Scottish Government during this period. While the focus of work with Governments was the support of the May 2022 elections, given the important role that the Scottish Government had in the contract for the eCount project, the EMB continued to advise on several workstreams including work on improving the accessibility of elections, further electoral reform and a revision to the funding of Scottish elections.

### UK Government

The EMB was represented on several of the consultative bodies advising UK Government on the implementation of the measures in the Elections Act 2022. This will bring a wide-ranging set of changes to the administration of UK elections including the introduction of photographic voter ID at polling stations. The EMB throughout this period provided sustained expert advice to Government as they prepared the associated secondary legislation. Operationally the introduction of photographic voter ID will have significant impacts on staffing, staff training, polling venues, polling processes and communication activity.

The EMB has also been involved in advising the UK Government on their review of their approach to the funding of elections.

## Looking Ahead

There are no scheduled elections in the period of 2022/2023 with the next electoral event anticipated to be a UK Parliamentary General Election, which must be held by mid-January 2025, but could come at any time following the repeal of the Fixed-term Parliaments Act 2011. The sector needs to maintain a state of readiness, being prepared to deliver an electoral event at short notice should that be needed.

With no immediate event around which to work, the EMB's work programme and activities for the coming year are shaped around the basic focus of supporting preparedness and developing capacity among ROs and EROs. In addition the Board is working with UK and Scottish Governments on the development and implementation of electoral legislation.

However EROs across Scotland do have immediate and demanding work pressures through 2022/23 as they are required to implement the Voter ID elements of the UK Elections Act 2022. This is a major and complex piece of work with a new IT portal being rolled out to allow the production of Voter Authority Certificates, with the portal active from early 2023.

### A Potential Referendum

The Referendum on Independence potentially scheduled for 19 October 2023 will not take place following the decision of the UK Supreme Court on the powers of the Scottish Parliament to legislate for such an event, but the EMB's advice to ROs and EROs is to maintain a state of readiness for an Independence Referendum given the prominence of the issue within Scottish and UK politics. An Independence Referendum would dominate the EMB's work at the relevant time as the Convener would be the Chief Counting Officer.

### Supporting preparedness and developing capacity

#### Lessons from May 2022

Following a review of the delivery of the Local Government Elections in May 2022 the EMB has agreed a work programme to be undertaken throughout 2023 and beyond. These include actions to be taken by the EMB alone, such as revisions to the website at [www.emb.scot](http://www.emb.scot) and others on which the EMB will work with ROs, EROs, the Electoral Commission and governments. These are detailed in the EMB's review of the Elections, available on the website.

#### Realising Efficiency

As detailed earlier in this report there are increasing challenges in the delivery of elections due to limited resources across local authorities. With tight budgets ROs are finding it difficult to allocate the staff, funds and resources to allow electoral events to be delivered. An important workstream for the EMB in the coming year is therefore considering creatively how additional efficiency can be realised within the sector to give ROs and EROs the resilience needed to continue to deliver elections of the high standards maintained hitherto and which voters deserve.

#### Accessibility

Accessibility of elections is an issue on which the EMB has been working for several years, in partnership with the Electoral Commission and both Governments. The UK Government's Elections Act makes changes to the way disabled people are supported in the polling station at UK Parliament elections by replacing the prescription of what must be provided, including TVDs, with a



requirement for Returning Officers to take all reasonable steps to support disabled voters to vote independently and in secret. This has the potential to improve the range and quality of support available and should speed up the process of providing additional support when a gap is identified, as legislation would no longer be required to allow the use of new technology. The Scottish Government is also considering ways to increase the accessibility of elections in its own electoral reform work. The EMB through a dedicated sub-group will continue to work on this to ensure that there are no barriers to participation in elections in Scotland, allowing all to vote secretly and independently.

### Working Groups

Much of this work will be undertaken through a series of EMB subgroups, pulling together officers from across the country to work on themes around Election Forms and Documents, Election Funding and Accessibility.

### Work with the Electoral Commission

The Electoral Commission's review of the May 2022 elections and the EMB's own review both identified work to be undertaken to resolve concerns that were identified. These included efforts to address high rates of spoilt ballots in some wards and problems with the completion of nomination papers. The EMB and the Electoral Commission will work together to identify actions to address these and other issues.

### Work with Governments

The EMB also has a programme of work in the coming year engaging with both UK and Scottish Governments on electoral legislation.

Work with the Scottish Government continues, noting their intention to review the funding of elections in Scotland. Again, the EMB will advise with the aim of protecting the interests of the voter through ensuring that elections are adequately resourced. The EMB is also supporting the electoral community to navigate the consequences of devolution in elections and the necessary divergence that is taking place in various areas.

As noted throughout this report the resourcing of elections remains a major concern with the erosion of local government budgets and limited capacity to support electoral events. Scottish Government's consultation on further electoral reform in Scotland has now been launched, and again the EMB will contribute to that work to ensure that the interests of the voter are paramount and the practicalities of electoral registration and administration are recognised.

There is significant work underway with the UK Government, both advising them and advocating for the electoral community in Scotland with respect to the implementation of the Elections Act 2022 and its implications, especially around the introduction of photographic voter ID and the change in absent voting arrangements.

The UK Government is also revising its approach to the funding of elections and the EMB is again advising Civil Service, seeking to ensure that adequate resources are preserved to allow safe, accessible and effective elections.

## Reviewing the role of the EMB

Over recent years, especially through the 'pandemic elections' of 2021 and 2022 it has become increasingly clear that the role of the EMB has matured and that its functional role has changed from that which it had at its creation in 2011.

Recently the EMB and its Convener have led, directed and advocated for ROs and EROs in a way that had not been necessary or required previously. In particular ROs and their staff are turning to the EMB for guidance, support and intervention around many practical issues. There has been a shift in expectation that the EMB is not simply *co-ordinating* RO and ERO activity; there is an assumption that the EMB is leading the delivery of elections in Scotland.

This change in perception and expectation had not been pursued by the EMB but is a result of the successful work of the EMB since 2011, recently emphasised by the need for clear and expert leadership during the crisis of the Covid pandemic. However, while what is expected of the EMB has developed, the legal structure, resourcing and formal remit remain as they were at its establishment a decade ago. These structures may limit the ability of the EMB to fulfil the role increasingly expected of it and put at risk the Board's ability effectively to support elections in future.

That these questions are being considered is a signal of the success of the EMB, not its failure. It is due to the high esteem with which the EMB is viewed that its limits are becoming apparent. The electoral community expects much from the EMB, and the EMB is delighted to offer the necessary support and leadership, as the electoral community itself expects and requests. Steps need now to be taken to ensure that the EMB can continue to deliver what is needed. These steps need also to develop our work with the broader stakeholder community in the electoral management in Scotland and their respective roles, including the Electoral Commission and the Scottish Government.

The EMB is therefore considering its formal role, remit and structure to ensure that it can continue to support the electoral community at a time of increasing pressure on those charged with administering elections. The EMB will present proposals to the Scottish Government to be considered in its Electoral Reform Consultation which will consider a development of the role of the EMB.

## Building Capacity and Adding Resilience

The review of the May 2022 elections identified a series of key risks facing the electoral community in the coming years. The EMB work programme will address these risks. A major element as noted above is the basic underlying capacity of Councils to plan, prepare and administer elections is now much weakened due to limited and diminishing resources in local government at the disposal of Returning Officers. As elections are a fundamental national infrastructure their resilience should be a national concern.

There is also awareness of the turnover of Returning Officers and their teams and the EMB is planning opportunities to train and support all those involved in and responsible for the delivery of elections.

## Financial Statement

Financial reports are available directly to the Scottish Government for monitoring purposes.

	2017/18	2018/19	2019/2020	2020/2021	2021/22
	Actual	Actual	Actual	Actual	Actual
<b>Expenditure</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>
Staff Secondees	81	60	65	65	66
Other Staff Costs					
Property Costs	6	6	6	6	6
Communications Support					
Website	3	1			
Other Expenditure	1	6	4	5	10
e-Counting Project	14		10	18	33
<b>Total Expenditure</b>	<b>105</b>	<b>73</b>	<b>85</b>	<b>94</b>	<b>115</b>
<b>Income</b>					
Scottish Government	111	79	101	121	130
Total Income	111	79	101	121	130
<b>Net Expenditure</b>	<b>-6</b>	<b>-6</b>	<b>-16</b>	<b>-27</b>	<b>-15</b>

## Board Membership

Further details are provided on the EMB website in the “About Us” section under “Members”.

<b>Convener</b>	<b>Malcolm Burr</b>	<b>Returning Officer for Na h-Eileanan Siar</b> <i>appointed 1 July 2018, reappointed July 2022</i>
<b>Returning Officer Members</b>	<b>Steve Grimmond*</b>	<b>Returning Officer for Fife</b> <i>appointed 1 October 2018, reappointed August 2022</i>
<b>*Current Member</b>	<b>Andrew Kerr*</b>	<b>Returning Officer for the City of Edinburgh</b> <i>appointed October 2015, re-appointed October 2019</i>
	<b>Kenneth Lawrie*</b>	<b>Returning Officer for Falkirk</b> <i>appointed November 2019</i>
	<b>Jim Savege*</b>	<b>Returning Officer for Aberdeenshire</b> <i>appointed October 2016, re-appointed October 2020</i>
	<b>Joyce White</b>	<b>Returning Officer for West Dunbartonshire</b> <i>appointed January 2021, retired June 2022</i>
	<b>Annemarie O'Donnell*</b>	<b>Returning Officer for the Glasgow City Council</b> <i>appointed June 2022</i>
<b>Electoral Registration Officer Members</b>	<b>Kate Crawford</b>	<b>Electoral Registration Officer for Renfrewshire</b> <i>appointed June 2017, retired July 2021</i>
<b>*Current Member</b>	<b>Ian Milton</b>	<b>Electoral Registration Officer Grampian</b> <i>appointed October 2013 re-appointed October 2017, retired June 2021</i>
	<b>Pete Wildman*</b>	<b>Electoral Registration Officer for Central</b> <i>appointed June 2015, reappointed June 2019</i>
	<b>Jim Doig*</b>	<b>Electoral Registration Officer Dumfries and Galloway,</b> <i>appointed July 2021</i>
	<b>Mark Adam*</b>	<b>Electoral Registration Officer Grampian,</b> <i>appointed June 2022</i>

## About us

### Our History

The EMB was established by the Local Electoral Administration (Scotland) Act 2011. This Act gives the Board “the general function of co-ordinating the administration of local government elections in Scotland.” The Scottish Elections (Reform) Act 2020 extended the remit of the Board to cover elections to the Scottish Parliament.

The EMB is independent of both Scottish and UK Governments and political parties and is accountable to the Scottish Parliament. The Convener is appointed by Ministers and leads a Board consisting of Returning Officers, their Deputies and Electoral Registration Officers.

Advisors include the professional associations: the Association of Electoral Administrators (AEA), the Electoral Registration Committee of the Scottish Assessors Association (SAA), the Elections Working Group of the Society of Local Authority Lawyers & Administrators in Scotland (SOLAR), and Scottish and UK Governments, and the Electoral Commission.

The EMB’s prime focus is ensuring that the interests of the voter are kept at the centre of all election planning and administration. The work of the EMB assumes the close community of electoral professionals in Scotland and accordingly the Board seeks to operate by consensus rather than formal direction, wherever possible. However, the Convener does have a power to issue directions to Returning Officers and Electoral Registration Officers in relation to their duties around Scottish Parliament and Local Government elections as required, and this power has been exercised in recent elections with the consent and wish of the electoral community.

The EMB has assisted in the coordination of the work of ROs and EROs in the delivery of European Parliamentary Elections, UK Parliamentary General Elections, Scottish Parliament Elections, Scottish Local Government Elections and UK and Scottish Referendums. Where the Convener does not have a legal power of direction the Board has made recommendations to achieve consistency and support adequate contingency planning across the country. Since its creation, the EMB has had an increasingly important role in promoting a consistent delivery approach, acting as a single point of contact for stakeholders and providing a source of professional expertise and support to the electoral community.

### Our Role

The EMB’s “**general function of co-ordinating the administration of local government and Scottish Parliament elections**” involves two specific roles:

- (a) assisting local authorities and other persons in carrying out their functions in relation to local government elections; and
- (b) promoting best practice in local government elections by providing information, advice or training (or otherwise).

The over-riding goal is to ensure that the interests of the voter are kept at the centre of all election planning, delivery and administration.

## Our Objective

With respect to specific electoral events this function translates into a single clear objective: “**...to deliver a result that will be trusted as accurate.**” The currency of elections is **trust**. Confidence in the result is fundamental to the democratic process and is predicated on confidence in all stages of the process of planning and delivering an electoral event.

## Our Principles

The EMB shapes its work around four key principles:

- **Accessibility** - there should be no barriers to any voter taking part;
- **Consistency** - voters should have the same experience wherever they are in Scotland;
- **Efficiency** - electoral events will be administered efficiently; and
- **Integrity** - electoral events will produce results that are accepted as accurate.

## Our Approach

The Board has the privilege of supporting a close and mutually supportive community of electoral professionals in Scotland. The preferred approach is always to operate through a progression of **consensus** where possible, **guidance** where helpful and **direction** if necessary.

## Contact Details

The EMB can be contacted through its Secretary:

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Full details of the EMB's work are provided on the website [www.emb.scot](http://www.emb.scot)