

## **General**

The WECB was established to develop consistency and cooperation in the management of elections and electoral registration across Wales. It benefits from strong support from the electoral services community within Local Government, Association of Electoral Administrators, The Electoral Commission and Welsh Government and is committed to making a full contribution to electoral reform. WECB believes that further consideration of its status could impact positively on the role it could fulfil in this process.

WECB welcomes any proposals to consolidate and simplify the rules for National Assembly and local government elections.

## **Proposals to extend the franchise**

- WECB is only concerned with the practical implications of the proposals to extend the franchise
- Associated primary and secondary legislation should be in place 6 months before the annual canvas (by Jan 2021 for July 2021) in readiness for local government elections in 2022
- WECB values the quality and consistency of EC advice and guidance to ERO's and RO's and RRO's. Six months is the minimum time required to refresh the guidance
- WECB members believe six months' notice for user testing is a minimum
- WECB recognises that the proposed franchise would result in different electoral registers for Welsh and Parliamentary elections resulting in potential challenges for voters (in understanding the differences and what they mean) and for electoral administrators (in dealing with two separate registers)

## **Duty to Promote Awareness**

- WECB notes that many Councils already have engagement and participation strategies in place. However, in the interests of consistency and cooperation, it favours a national framework, appropriately resourced which should build on the experience already gained. ERO's do not currently have the resources to implement public awareness on the scale necessary here within the time available
- WECB supports separate awareness campaigns for the annual canvas in 2021 and for the election in 2022
- WECB recommends that the EC be involved in the development of educational/awareness resources to further promote a consistent approach.

## **Introduction of two different voting systems**

- WECB believes this will result in potential voter confusion (how to cast a vote), increased administrative risks (new procedures for managing the count, additional training for staff)
- WECB believes this will result in potential challenges for Candidates, agents and parties
- WECB believes this will result in potential challenge to the EC (publication of two sets of guidance for ERO's, RO's, Candidates, Parties) and will impact on awareness campaigns
- WECB believes this will adversely impact on consistency of approach and could have impacts on regional working, collaboration and Corporate Joint Committees

- Different voting systems would have an adverse impact on planning on a national basis

#### **Consultation with The electoral Commission**

- WECB believes that in the interests of consistency and independence, Welsh Ministers should be required to consult with the EC on a range of issues:- Any regulations made under the Representation of the Peoples Act, 1983; before making an order to change the day of an election; before publication of any Returning Officers' Charges Order; the design of any pilot scheme and framework for evaluation; the production of guidance

#### **Qualification for Membership of a local authority**

- WECB notes the potential for serving Council Officers to stand for election and would not wish to compromise the fundamental principle of independence and impartiality of advice and support. Management of matters arising from such officers standing for election (successfully or not) will require careful consideration and emphasises the need for a distinction between the role carried out by electoral administrators during an election event and their employment by the LA
- WECB has a view that legislation concerned with 'disqualification' should include provision for the suspension of payment at least from the date of any relevant criminal conviction to the date of disposal of an appeal and that payment be made in a lump sum in the event of a successful appeal

#### **Database of electoral registration information**

- WECB believes that proposals should be the subject of consultation with the general public and the Information Commissioner's Office

#### **Election Pilot Schemes**

- WECB would prefer a single source of guidance and the service received from the EC provides for a consistent and independent approach. The potential for two sources of guidance on a single function is likely to confuse

#### **Expenditure of returning officers**

- WECB believes that:- RO's must be independent from national and local governments; The role should be independently remunerated to demonstrate this as they are not employed by their host Authority for this purpose; they are accountable to the courts in this role (not their employer); alternative proposals would weaken independence; separation of roles is important in maintaining appropriately skilled and experienced personnel

#### **Additional considerations**

- WECB supports the views of the EC with regard to Digital Imprints; exemption for disability expenses (encourage diversity); exemption for translation costs (welsh /English) and publication of candidate spending returns