

# **Electoral Registration** Contingency planner and risk register

## Local Authority Elections 2012

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## Defining the level of impact and likelihood of risk

The risk assessment grid

	Impact		
Likelihood	High (3)	Medium (2)	Low (1)
High (4) (certain)			
High (3) (probable)			
Medium (2) (possible)			
Low (1) (unlikely)			

The risk assessment process requires a subjective judgement to be made on the potential impact and likelihood of the risks identified in the risk register. When this is completed, the likelihood should be multiplied by the impact to provide a rating for each risk. **For example:**

Risk description	Likelihood	Impact	Rating	Contingency/action	Responsible officer	Review date
Loss of polling place – school destroyed by fire prior to election. Example only	2	3	6	Identify alternative polling place/order mobile polling station/portacabin Contact electors, erect signage		

### Electoral Registration Service contingency planner and risk register.

Some elements of these risks are at the interface between Registration and Election Management and should be co-ordinated with the Election Management contingency plans

Risk description	Likelihood	Impact	Rating	Contingency/action	Responsible officer	Review date
<b>1. Challenge to the election</b>						
1.1 Legal action against the ERO (especially in regard to prisoner disenfranchisement)	2	3	6	<ul style="list-style-type: none"> <li>Legal support – monitor awareness of issues among currently available legal team. Currently Clacks Legal Services are very well aware of the issues and have been involved in defending the EROs decisions on this matter at the highest level.</li> <li>Effective training of senior staff to recognise potential issues</li> <li>Lodging continuous “caveats” with local courts and Court of Session.</li> <li>Liaise with other EROs and through EMB be aware of current campaigns and legal decisions</li> </ul>	ERO	Feb 2012

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2. Data security						
2.1 Loss of data in transit	2	3	6	<ul style="list-style-type: none"> <li>• Ensure all transfer of data is encrypted</li> <li>• Use SFTP transfer to printers</li> <li>• Ask for personal collection of printed versions of the register (get receipt)</li> <li>• Any email or CD transfer must be encrypted (using 7zip rather than weaker formats)</li> <li>• Transfer on behalf of ERO to a supplier must be under a contractual relationship or legal requirement.</li> <li>• Any transfer on behalf of RO must be sanctioned by pre-agreed timing and to named supplier. Need for RO to approve in advance that ERO may transfer data directly to named service provider if necessary. Check that RO has a contractual relationship with the supplier. Ensure that data protection matters are covered by the contract between RO and Printer</li> </ul>	<p>Depute ERO (as Data Protection officer)</p> <p>Returning Officer for any council contracts</p>	<p>From Oct 2011</p> <p>Feb/Mar 2012</p>

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				<ul style="list-style-type: none"> <li>• Particular care with this in view of Scottish Government contract with Logica</li> <li>• Make training provision to ensure all staff are aware of their legal responsibilities around the supply of information</li> <li>• Ensure that transfer of data between ERO and RO is via "HALAPP" folders and ensure that only nominated RO staff have access to this folder</li> <li>• RO staff must remove data daily from "Halapp" folders or when advised and save to a secure location. As such data can cause back-up failure it will be removed as part of the overnight back-up procedures. Remind RO staff of this.</li> </ul>		
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3. External action						
3.1 Planned industrial action which would impact on the availability of some staff	2	2	4	<ul style="list-style-type: none"> <li>• Ensure project plan allows for delays when some staff may not be available</li> <li>• Develop plan to identify</li> </ul>	ERO/Depute ERO	From Aug 2011

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				<p>alternative resources as far as possible to provide alternative staff cover.</p> <ul style="list-style-type: none"> <li>• Work out contingencies to cover the situation where industrial action is scheduled for key election dates</li> </ul>		
3.2 Lack of awareness and insufficient planning for new legislation and changes in legislation or guidance	1	3	3	<p>Awareness of and input to Scottish Government policy through SAA &amp; AEA. Good communications with appropriate UK Departments such as Cabinet Office, Scotland Office for statutory functions that may affect the election (e.g. prisoners) and departments (e.g. Finance, HR/personnel, RO) of the 3 Councils for non-statutory matters.</p> <p>Encourage all EROs' involvement in the Electoral Management Board. Keep software supplier (Halarose) aware of pending developments.</p>	ERO	ongoing

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3.3 Boundary changes	4	2	8	Ensure GIS within office can provide the required service. Persuade Councils to have all reviews concluded, published and implemented before 1 <sup>st</sup> November 2011. Falkirk review implemented for 1 <sup>st</sup> December.	Depute ERO	From June 2011
				ROs should double check any boundary changes (Falkirk PD review), per Electoral Commission report of October 2011 into Scottish Parliamentary Elections, to ensure boundary changes feed through correctly to polling places allocation.	Falkirk Election Team/ Depute ERO	Dec 2011 onwards

<b>4. Loss of premises</b>						
4.1 Office (wholly or partly)	1	3	3	<ul style="list-style-type: none"> <li>Develop and improve the Business continuity plan</li> <li>Prepare list of alternative venues, including making standby arrangements if necessary</li> <li>Ensure that contingency arrangements are DDA compliant</li> </ul>	Assistant Assessor and Office Manager	From June 2011

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				<ul style="list-style-type: none"> <li>• Confirm access to communications (e.g. mobile coverage, available landline)</li> <li>• Check facilities (heating, power, toilets etc.) and fire and security arrangements</li> <li>• Share RO &amp; ERO Business Continuity plans to ensure continuing contact</li> </ul>		
<b>5. Failure of IT provision</b>						
5.1 System failure	2	3	6	<ul style="list-style-type: none"> <li>• Detailed comprehensive and strict back-up regime to disc and/or tape for storage in fire proof safe or off-site</li> <li>• Ensure hard copies of data are available</li> <li>• Maintain a duplicate system capable of replacing the original at short notice or if unaffected by the initial failure to be available almost immediately as a mirror</li> <li>• Halarose can access &amp; provide service via VPN if required</li> <li>• Upgraded Pervasive database in Nov 2011</li> </ul>	Depute Assessor  Depute ERO, IT, Office Manager	ongoing



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5.2 Network failure	2	3	6	<ul style="list-style-type: none"> <li>standby arrangements with contractor and in-house IT providers</li> </ul>		
5.3 Printers / scanners malfunction	3	2	6	<ul style="list-style-type: none"> <li>Ensure printers and scanners have maintenance agreements and serviced if necessary, spare toner available, etc. before election commences.</li> </ul> <p>Printer serviced in December 2010 and warranty renewed. New call out warranties established for the two main scanners – service was not required for the warranty. A third stand alone scanner is in use on top floor.</p> <p>We need two scanners to cope with the expected workload, the provision seems adequate – however review the provision in late March early April, as unnecessary early servicing can itself be a risk.</p> <ul style="list-style-type: none"> <li>Check on service for main printer (Apollo) February 2012</li> <li>Call out service warranty renewed in December 2011</li> <li>Use identified alternative printers and scanners within the building and ensure</li> </ul>	Office manager/IT	ongoing

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				<p>necessary network connections are in place by Feb 2012.</p> <ul style="list-style-type: none"> <li>One additional dedicated scanner (for canvass use) to be purchased in February 2012 and will then have sufficient scanning capacity that a breakdown of one scanner will not delay processing unduly.</li> </ul>		
5.4 IT office affected by flood, fire, vandalism, etc.	1	3	3	<ul style="list-style-type: none"> <li>Review business continuity plan (BCP) and security arrangements</li> <li>BCP plan pack held elsewhere e.g., senior officer's homes and Council office</li> <li>Keep documentation on how to perform functions manually up to date</li> <li>Consider more formal arrangement with supplier for alternative emergency accommodation</li> </ul>	Assistant Assessor & Office Manager	Dec 2011

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5.5 Telecom/fax failure	2	2	4	<ul style="list-style-type: none"> <li>In the quarter before election date as part of BCP set up redirection service to mobile phones or alternative location (FAX). For short notice election set up a partial redirection service immediately.</li> <li>Follow up on 31 January 2011 email from Office Manager to Clive Madge of THUS to follow up on previous advice. Then confirm position remains the same</li> </ul>	Office Manager	Jan 2012
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<b>6. Security and fraud issues</b>						
6.1 Loss of key documentation papers, etc.	2	2	4	<ul style="list-style-type: none"> <li>Ensure office kept locked outside of office hours</li> <li>use safe and locked cupboards for storage of key documentation</li> </ul>	Office manager	ongoing
6.2 Unauthorised access to office	1	2	2	<ul style="list-style-type: none"> <li>Maintain a list of authorised key holders and others entitled to access the office</li> <li>Change access codes regularly and whenever staff leave.</li> </ul>	Office manager	ongoing

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6.3 Any accusations of fraud	1	2	2	<ul style="list-style-type: none"> <li>• Keep in touch with local SPOC at least once in the year (previous contact June 2011) plus contact regarding registration issues in Sept 2011</li> <li>• Make contact with local police SPOC in advance of the election period. contacted Feb 2012</li> <li>• Develop media strategy for use in the event of accusations being made</li> </ul>	ERO/Depute ERO	Sept 2011
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<b>7. Failure on part of contractor</b>						
7.1 Printers (Poll cards and registers)	2	2	4	<ul style="list-style-type: none"> <li>• Prepare list of approved contractors</li> <li>• Check out performance of potential suppliers, including any sub-contractors, with other major clients</li> <li>• Consider visiting selected printer premises to inspect capacity, set up and processes</li> <li>• Check printers project plan and quality management processes</li> <li>• Consider contingency arrangements to print products</li> </ul>	Depute ERO	From June 2011

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				<p>elsewhere in the event of non-delivery (including in-house)</p> <ul style="list-style-type: none"> <li>• Ensure rigorous contracting arrangements are in place, also covering any sub-contractors</li> <li>• Ensure supplier is aware of and takes account of data protection issues</li> <li>• Even if continuing with previous printers, check/monitor as thoroughly as would with a new printer</li> <li>• Test files to be provided and approved</li> </ul>		
7.2 Stationery/equipment, etc.	1	1	1	<ul style="list-style-type: none"> <li>• Review existing stock levels and prepare inventory</li> <li>• Place orders to replenish stocks</li> <li>• Arrange early planning meeting with provider to confirm overall requirements ) (Dec 1011)</li> <li>• Check wording of official documents to ensure compliance with legislation</li> <li>• Depute ERO to check that our website and stationary stock are current versions</li> <li>• Confirm that RO staff have</li> </ul>	Office Manager/ Depute ERO/	<p>From June 2011</p> <p>Oct 2011</p> <p>Nov 2011</p>

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				checked that only current versions of forms are provided in libraries and available via Council websites		
7.4 Royal Mail (Poll Cards )	2	2	4	<ul style="list-style-type: none"> <li>• Establish contact with Account Manager</li> <li>• Set up regular review meetings with Royal Mail</li> <li>• Ensure early receipt of business reply numbers, etc.</li> </ul>	Depute ERO/Office Manager.	From August 2011

<b>8. Poll cards</b>						
8.1 Inclusion of inaccurate or incomplete information	2	2	4	<ul style="list-style-type: none"> <li>RO staff to check their polling scheme files before advising Depute ERO when to extract files. Any addresses not in polling scheme cannot be extracted for printers</li> <li>Early agreement with election offices on issue date of polling cards. Early issue is recommended. Latest date has been directed by EMB (by 2 April 2012)</li> <li>Early agreement on wording for each version of poll-card. Final</li> </ul>	Depute ERO/  Election Office Stirling on behalf of all	From Dec 2011  From Nov 2011

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				<p>versions to be sent to printers immediately after the agreed deadline. (Feb 2012)</p> <ul style="list-style-type: none"> <li>• Have alternative wording on standby.</li> <li>• Decide as part of election planning whether certain poll cards will be printed “in-house” or as part of contract with supplier (proxy poll cards, postal proxy poll cards, anonymous poll cards)</li> <li>• Agree export formats with printer and selection criteria (whether overseas address selected separately or not)</li> <li>• Robust proofing procedures including ERO &amp; each RO to have access to printer’s SFTP site for data transfer and proof checking.</li> <li>• Include quality checks in contract or in any in-house arrangements prior to issue</li> <li>• Confirm contingency arrangements with supplier</li> <li>• Reprint poll cards or consider alternative means of notification of all relevant</li> </ul>	<p>three Councils</p> <p>Depute ERO/</p>	<p>From Oct 2011</p>
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				<p>details (e.g. by letter)</p> <ul style="list-style-type: none"> <li>• Ensure our own large printer is available as contingency (to issue by letter) or to use for anonymous or other unusual cards if not part of suppliers service (IBM call out service in place)</li> <li>• Ensure RO and polling staff are aware of the fact that details on the issued poll card can be changed in the register by election day. Although a new card or letter may be issued the old one cannot be withdrawn and an elector may mistakenly (or deliberately) turn up with the old card</li> <li>• <del>(Falkirk intends to review their polling scheme in time for publication date of 1<sup>st</sup> December. However there is a risk of delay which may require re-publication of the Falkirk register in February or March. ERO has written to Depute RO with details of the disruption caused to users of the register by re-publication just before an election and DERO has given indication of the cost. The main issue is disruption to users and this is understood by DRO.)</del> Falkirk PD scheme approved by Council in October 2011.</li> <li>• Start testing systems in January/February 2012 (see email from RT to 3 election</li> </ul>	<p>ERO/ Depute ERO</p>	
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				offices 17 January 2011 for template). Test again after any re-publication		
8.2 Problems (or past problems) with delivery	2	2	4	<ul style="list-style-type: none"> <li>• Maintain regular contact with Royal Mail or other distributor</li> <li>• Discuss alternative options for emergency hand delivery, in limited problem area, with Returning Officer staff or any other alternative provider. For example to cover the loss of a polling station.</li> </ul>	Depute ERO/	From August 2011

<b>9. Postal votes</b>						
9.1 Actions of Political canvassers	2	2	4	<p>Attend any pre-election briefing by ROs for Parties and candidates to emphasise the importance of the relevant guidelines in safeguarding the voters' interests</p> <p>Watch for suspected improper use of business reply</p>	ERO	From March 2012 ongoing

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				Through Electoral Commission and PPP raise awareness of potential problems with Absent votes		
9.2 Absent Vote data supply problems	3	3	9	<p>Work out a detailed plan to ensure that data is supplied as early as possible. Agree this plan with ROs; indicating where the risks lie.</p> <p>For example set a time limit by which no more input of postal votes received on the last day will be accepted. Check and produce a register at that time, store and produce the absent vote list from that register and send data to each supplier.</p> <p>After data is accepted, resume input of any outstanding absent votes to produce the “pull out” list. This ensures that data is sent as early as possible but can result in additional “pull out” work for printers ROs and ERO.</p> <p>The EMB has indicated (November Election Bulletin) that all postal votes should be issued by 23 April 2012. (This is potentially in conflict with legislation and EC guidance, but probably just means the main or bulk</p>	ERO/Depute ERO	From August 2011

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				<p>issue rather than literally “all”)</p> <p>Discuss with RO staff &amp; printers proposed timetables for supply of any early list &amp; system for pulls and additional postal vote data. The plan should include a procedure &amp; solution with RO staff re changes in register up to midnight after absent list closes at 5pm for electors with postal votes (Name changes and /or address changes)</p> <p>Need to establish number of data transfers to printers</p> <p>Once agreed, any later suggestions from RO staff, for example regarding “pull outs”, that are incompatible with this plan should be referred to the ERO and the appropriate RO.</p> <p>It is important to note that the time taken by the system to produce a register, store absent vote lists, and to verify receipt of data can be several hours; so it may be necessary to set the “no more update” limit close to, or earlier than, the 5pm deadline for applications, depending on the data receipt “slot” agreed by ROs.</p>		
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				<p>As in 2010 and 2011 arrange overtime working where necessary to ensure that all postal vote applications are added to the system on day of receipt - including weekend working to prevent backlog building up on Saturdays. This worked well in 2010, during an upsurge in interest and if repeated will mean that an early cut off will only affect applications received on the last day, although that could still be considerable numbers. As in 2011 if there is no surge in interest overtime can be scaled back.</p> <p>Obtain written confirmation of requirements in data format direct from the printer/supplier – do not rely only on information from RO staff or memory of previous elections. Where there is a difference report it to ERO.</p>		
9.3 Verification of identifiers delaying the count	2	3	6	<ul style="list-style-type: none"> <li>As part of election plan ensure that Election teams request an early copy of images for testing and have an agreed timetable for such tests.</li> </ul>	Depute ERO	January 2012

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				<ul style="list-style-type: none"> <li>Suggest that after the election those rejected which need further investigation to be forwarded to SPOC and or Team Leader as necessary within 30 days</li> </ul>		
9.4 Major system failure (ROs system)	2	2	4	<ul style="list-style-type: none"> <li>Transfer data including images to “Halapp” folders. Confirm that RO staff can then access a secure copy via any required laptop or other contingency. If “Halapp” is unavailable for transfer of such large files copy to CD/DVD as necessary (encrypted) and hand deliver to named contact.</li> </ul>	Depute ERO	April 2012

<b>10. Staffing</b>						
10.1 Insufficient competent staff	2	2	4	<ul style="list-style-type: none"> <li>Early agreement on staff availability</li> <li>Well documented recruitment procedures</li> <li>Comprehensive training programme carried out early</li> </ul>	Depute ERO	August 2011
10.2 Insufficient staff to deal with registration applications	2	2	4	<ul style="list-style-type: none"> <li>Daily monitoring of mail , e-mails etc - including</li> </ul>	Depute ERO/ ERO & Team	Generally from

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received close to the 11 day deadline				<ul style="list-style-type: none"> <li>assessor's portal addresses</li> <li>• Authorise overtime as required to ensure no backlog occurs</li> <li>• Second staff from Assessor and Councils if necessary. Secondment of other VJB staff to electoral duties worked well in 2011 and should be repeated in 2012</li> <li>• Ensure VJB staff have sufficient skills to be able to assist by secondment at canvass time in 2011</li> </ul>	Leader	August 2011 Practice in place from January 2012
10.5 Mistakes by inexperienced staff or by staff not fully aware of changes to legislation	3	2	6	<ul style="list-style-type: none"> <li>• Training to be scheduled for all registration related staff to ensure competence to undertake duties.</li> <li>• Provide guidance notes to relevant staff</li> <li>• Carry out election refresher training for core staff during the six months prior to the election</li> <li>• Checking system is in place to ensure that every application is verified by 2 staff members</li> <li>• Share details of staff training documents between ERO &amp; RO staff. PO's etc</li> </ul>	Depute ERO	From Dec 2011
10.6 Over reliance on key staff	2	3	6	<ul style="list-style-type: none"> <li>• ERO and Depute ERO</li> </ul>	Management	ongoing

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				<p>membership of SAA ER committee as source of advice on shared election issues. Dissemination of that advice to other key staff</p> <ul style="list-style-type: none"> <li>• Ongoing development of procedures manuals/instructions</li> <li>• Similarly ERO Depute ERO and Assistant Assessors membership of AEA</li> <li>• Encouragement of Election teams to use ERO Team Leader as main point of contact for most issues (especially postal voting)</li> <li>• Team Leader to attend meetings with RO staff and with suppliers.</li> <li>• Identify named deputies for RO senior staff and obtain up-to-date structure lists. Share contact details with Election Teams.</li> <li>• All VJB staff to be provided with a checklist to allow completeness checks on hand delivered application forms so that they can be verified as</li> </ul>	Team	
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				<ul style="list-style-type: none"> <li>fully complete before the elector leaves the building</li> <li>This checklist to be provided to Council staff for similar use.</li> </ul>		
10.7 Problems with access rights to the Halarose Eros system	3	2	6	<ul style="list-style-type: none"> <li>There is a balance to be struck between access and security. Tighter control since 2009 by the administrator has protected ERO and RO data but we should investigate the specific areas where control may now be capable of relaxation</li> <li>Experience in 2009 was that access allowed for one reason resulted in damage to other Councils' and ERO's core areas.</li> <li>ERO to identify areas where Halarose Eros access can be open to non administrators in ERO staff (subject to Halarose amending the system) (Halarose upgrade November 2011 amended to limit to "offices")</li> <li>Depute ERO has previously requested RO staff to provide details where direct access is required. Ensure all are aware</li> </ul>	ERO	<p>July 2011</p> <p>Nov 2011</p>



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				<p>of the Halarose arrangements for "Office" demarcation for security.</p> <ul style="list-style-type: none"> <li>• Until satisfied that the demarcation system is secure and reliable any requests can be made via Depute ERO (as system administrator) for consideration of the potential impact on ERO data and other Councils' data. The IT team and Halarose (via VPN) can also act as administrators to carry out the specific task in the absence of the Depute ERO.</li> <li>• Ideally Councils should nominate local administrators for adding, deleting staff and password control.</li> </ul>		
10.8 Not closing down Eros processes; preventing later user login.				<ul style="list-style-type: none"> <li>• This caused several problems early in the 2010 election as RO staff began to set up elections. Halarose has implemented a solution suggested by the IT team and this seems to have removed the problem fro 2011. However as busier election times</li> </ul>	Depute ERO	Jan 2012

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				approach all staff (ERO and RO) should be reminded to close down processes or if unable to do so for some reason, report this to the ERO's IT team so that any ensuing problem can be rectified or allow back-up processes to be temporarily rescheduled		
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11. Polling day						
11.1 Polling day enquires from the public or from election staff	4	1	4	<ul style="list-style-type: none"> <li>• Ensure expert staff available on election day</li> <li>• IT availability on election day depending on RO requirements</li> <li>• If not requested – prompt ROs to prevent late request</li> <li>• Ensure IT and other staff are aware of named contacts in Election Offices</li> <li>• Pre agree (well before the election) with election offices the procedures for correcting clerical errors</li> </ul>	ERO/Depute ERO	From Dec 2011
11.2 Problems with voter dissatisfaction or aggressive	2	2	4	<ul style="list-style-type: none"> <li>• Provide guidance to frontline staff, including FAQs to assist</li> </ul>	Team Leader	Dec 2011

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behaviour				<ul style="list-style-type: none"> <li>with giving answers to common queries</li> <li>• Provide guidance on dealing with aggressive customers, drawing on resources developed by other council departments</li> </ul>		
11.3 Mistakes by RO staff, PO, & PC	3	2	6	<ul style="list-style-type: none"> <li>• Suggest ERO staff are involved in pre-election training so that it covers relevant aspects of registration and register display (agreed with Stirling for 2012)</li> <li>• Ask for draft of election notices and Council advertising of registration before publication.</li> <li>• Avoid using registration “jargon” when dealing with inexperienced RO staff. They may not hear what you think you are saying and this can lead to mistakes or misunderstandings. For example the Halarose activity “Storing Postal Votes” at the very end of postal voting processing may be wrongly interpreted as “stockpiling postal vote applications”</li> <li>• Feedback forms from Election</li> </ul>	Depute ERO	Aug 2011

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				<ul style="list-style-type: none"> <li>Day staff re problems to form part of post election review.</li> <li>Post election review to be held within 6 weeks of polling day</li> </ul>		
11.4 Polling station fire or similar disruption during election day	2	3	6	<ul style="list-style-type: none"> <li>If register destroyed, duplicate can be provided by RO staff from original copy supplied, or can request Depute ERO to provide a fresh copy.</li> <li>Alternative polling station, contact press, electors, signage</li> </ul>	Election Team (Depute ERO if requested)	As required