Electoral Registration Contingency planner and risk register

Scottish Parliamentary general election 2011

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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.	2	3	6	Identify alternative polling place/order mobile polling station/portacabin		

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
1. Challenge to the election						
1.1 Legal action against the ERO (especially in regard to prisoner disenfranchisement)	2	3	6	• 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. • Effective training of senior staff to recognise potential issues • Lodging continuous "caveats" with local courts and Court of Session. • Liaise with other EROs and through EMB be aware of current campaigns and legal decisions	ERO	Nov 2010

2. Data security						
2.1 Loss of data in transit	2	3	6	• Ensure all transfer of data is encrypted • Use SFTP transfer to printers • Ask for personal collection of printed versions of the register (get receipt) • Any email or CD transfer must be encrypted (using 7zip rather than weaker formats) • Transfer on behalf of ERO to a supplier must be under a contractual relationship or legal requirement. • Any transfer on behalf of RO must be sanctioned by pre-agreed timing and to named supplier. Check that RO has a contractual relationship with the supplier • Make training provision to ensure all staff are aware of their legal responsibilities around the supply of information • Ensure that transfer of data between ERO and RO is via "HALAP" folders and ensure	Depute ERO (as Data Protection officer)	Oct 2010

				that only nominated RO staff have access to this folder • RO staff must remove data daily from "Halap" 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.		

3. External action						
3.1 Planned industrial action which would impact on the availability of some staff	2	2	4	• Ensure project plan allows for delays when some staff may not be available • Develop plan to identify alternative resources as far as possible to provide alternative staff cover. • Work out contingencies to cover the situation where industrial action is scheduled for key election dates	ERO/Depute ERO	Aug 2010
3.2 Lack of awareness and insufficient planning for new legislation and changes in legislation or guidance	1	3	3	Awareness of and input to Government policy through SAA & AEA. Good communications with appropriate departments such as Cabinet Office, Scotland Office,	ERO	ongoing

				Scottish Government for statutory functions and departments (e.g. Finance, HR/personnel, RO) of the 3 Councils for non-statutory matters. Encourage EROs' involvement in (Interim) Electoral Management Board. Keep software supplier (Halarose) aware of pending developments.		
3.3 Boundary changes	4	2	8	Ensure GIS within office can provide the required service. Liaise with ROs re requirements for Polling Scheme. Particular concerns with any changes to polling schemes as a result of the new Scottish Parliamentary boundaries due in 2010, as the boundary approval is expected to be delayed until Autumn 2010. Council Polling Schemes must be in place before publication of the register in the new boundaries can be achieved. Most Councils have agreed to do this before November 2010 but there is some doubt about Falkirk who may wish to carry out a full review which cannot be	Depute ERO	From June 2010

				completed until just before the election.		

4. Loss of premises						
4.1 Office (wholly or partly)	1	3	3	• Develop and improve the Business continuity plan • Prepare list of alternative venues, including making standby arrangements if necessary • Ensure that contingency arrangements are DDA compliant • Confirm access to communications (e.g. mobile coverage, available landline) • Check facilities (heating, power, toilets etc.) and fire and security arrangements • Share RO & ERO Business Continuity plans to ensure continuing contact	Assistant Assessor (West) and Office Manager	From June 2010

5. Failure of IT provision						
5.1 System failure	2	3	6	• Detailed comprehensive and strict back-up regime to disc and/or tape for storage in fire proof safe or off-site • Ensure hard copies of data are available • 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 • Halarose can access & provide service via VPN if required	Assistant Assessor (East)	ongoing
5.2 Network failure	2	3	6	• standby arrangements with contractor and in-house IT providers		
5.3 Printers / scanners malfunction	3	2	6	• Ensure printers and scanners have been fully serviced, spare toner available, etc. before election commences • Call out service for main printer (Apollo) • Use identified alternative printers and scanners within the building and ensure	Office manager/IT	ongoing

				• necessary network connections are in place • Have sufficient scanning capacity that a breakdown of one scanner will not delay processing unduly			
5.4 IT office affected by flood, fire, vandalism, etc.	1	3	3	• Review business continuity plan (BCP) and security arrangements • BCP plan pack held elsewhere e.g., senior officer's homes and Council office • Keep documentation on how to perform functions manually up to date • Consider more formal arrangement with supplier for alternative emergency accommodation	Assistant Assessors & Office Managers	August 2010
5.5 Telecom/fax failure	2	2	4	• 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	Office Manager	Jan 2011

6. Security and fraud issues						

6.1 Loss of key documentation papers, etc.	2	2	4	• Ensure office kept locked outside of office hours • use safe and locked cupboards for storage of key documentation	Office manager	ongoing
6.2 Unauthorised access to office	1	2	2	• Maintain a list of authorised key holders and others entitled to access the office • Change access codes whenever key staff leave.		
6.3 Any accusations of fraud	1	2	2	• Keep in touch with local SPOC at least once in the year • Make contact with local police SPOC in advance of the election period. • Develop media strategy for use in the event of accusations being made	ERO/Depute ERO	Sept 2010

7. Failure on part of contractor						
7.1 Printers (Poll cards and registers)	2	2	4	• Prepare list of approved contractors • Check out performance of	Depute ERO	From June 2010

				• potential suppliers, including any sub-contractors, with other major clients • Consider visiting selected printer premises to inspect capacity, set up and processes • Check printers project plan and quality management processes • Consider contingency arrangements to print products elsewhere in the event of non-delivery (including in house) • Ensure rigorous contracting arrangements are in place, also covering any sub-contractors • Ensure supplier is aware of and takes account of data protection issues • Even if continuing with previous printers, check/monitor as thoroughly as would with a new printer		
7.2 Stationery/equipment, etc.	1	1	1	• Review existing stock levels and prepare inventory • Place orders to replenish stocks • Arrange early planning meeting with provider to confirm overall	Office manager/ Depute ERO/	From June 2010

				requirements • Check wording of official documents to ensure compliance with legislation • Depute ERO to check that our website and stationary stock are current versions • Confirm that RO staff have 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	• Establish contact with Account Manager • Set up regular review meetings with Royal Mail • Ensure early receipt of business reply numbers, etc. •	Depute ERO/Office manager.	From August 2010

8. Poll cards						
8.1 Inclusion of inaccurate or incomplete information	2	2	4	• 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	Depute ERO/	From August 2010

				- Early agreement on wording for each version of poll-card. Final versions to be sent to printers immediately after the agreed deadline - 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) - Agree export formats with printer and selection criteria (whether overseas address selected separately or not) - Robust proofing procedures including ERO & each RO to have access to printer's SFTP site for data transfer and proof checking. - Include quality checks in contract or in any in-house arrangements prior to issue - Confirm contingency arrangements with supplier - Reprint poll cards or consider alternative means of notification of all relevant		

				details (e.g. by letter) • 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) • 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 is issued the old one cannot be withdrawn and an elector may mistakenly (or deliberately) turn up with the old card		
8.2 Problems (or past problems) with delivery	2	2	4	• Maintain regular contact with Royal Mail or other distributor • 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.		

9. Postal votes						
9.1Actions of Political canvassers	2	2	4	Attend any pre–election briefing by ROs for Parties and candidates to emphasise the importance of the relevant guidelines in safeguarding the voters' interests Through Electoral Commission and PPP raise awareness of potential problems with Absent votes	ERO	From March 2011 ongoing
9.2 Absent Vote data supply problems	3	3	9	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. 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.	ERO/Depute ERO	From August 2010

				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. Discuss with RO staff & printers proposed timetables for supply of any early list & system for pulls and additional postal vote data. The plan should include a procedure & 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) 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. 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. As in 2010 arrange overtime working 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, 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. 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 this to ERO.		
9.1 Verification of identifiers delaying the count	2	3	**6**	• As part of election plan ensure that Election teams request an	Depute ERO	January 2011

				early copy of images for testing and have an agreed timetable for such tests. • 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		
9.10 Major system failure (ROs system)	2	2	4	• Transfer data including images to "Halap" folders. Confirm that RO staff can then access a secure copy via any required laptop or other contingency. If "Halap" is unavailable for transfer of such large files copy to CD/DVD as necessary and hand deliver to named contact.	Depute ERO	April 2011

10. Staffing						
10.1 Insufficient competent staff	2	2	4	• Early agreement on staff availability • Well documented recruitment procedures • Comprehensive training programme carried out early	Depute ERO	August 2010
10.2 Insufficient staff to deal	2	2	4	• Daily monitoring of mail , e-	Depute ERO/	From

with registration applications received close to the 11 day deadline					mails etc - including assessor's portal addresses • Authorise overtime as required to ensure no backlog occurs • Second staff from Assessor and Councils if necessary • Ensure VJB staff have sufficient skills to be able to assist	ERO & Team Leader	August 2011
10.5 Mistakes by inexperienced staff or by staff not fully aware of changes to legislation	3	2	6	•	Training to be scheduled for all registration related staff to ensure competence to undertake duties. • Provide guidance notes to relevant staff • Carry out election refresher training for core staff during the six months prior to the election • Checking system is in place to ensure that every application is verified by 2 staff members • Share details of staff training documents between ERO & RO staff. PO's etc	Depute ERO	From Dec 2010
10.6 Over reliance on key staff	2	3	6	•	ERO and Depute ERO membership of SAA ER committee as source of advice on shared election issues. Dissemination of that advice to	Management Team	ongoing

				• other key staff • Similarly ERO Depute ERO and Assistant Assessors membership of AEA • Encouragement of Election teams to use ERO Team Leader as main point of contact for most issues (especially postal voting) • Team Leader to attend meetings with RO staff and with suppliers. • Identify named deputies for RO senior staff and obtain up-to-date structure lists. Share contact details with Election Teams. • 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 fully complete before the elector leaves the building • This checklist to be provided to Council staff for similar use.			
10.7 Problems with access rights to the Halarose Eros system	3	2	6	• There is a balance to be struck between access and security. Tighter control since 2009 by	ERO		July 2010

			the administrator has protected ERO and RO data but we should investigate the specific areas where control may now be capable of relaxation • Experience in 2009 was that access allowed for one reason resulted in damage to other Councils' and ERO's core areas. • ERO to identify areas where Halarose Eros access can be open to non administrators in ERO staff (subject to Halarose amending the system) • Depute ERO has previously requested RO staff to provide details where direct access is required. Minutes of SHUG meeting June 2010 requires all members to supply information by 31/07/10 for June Nelson (DABVJB) to collate. • Until such details are provided and Halarose supply a solution to access problems 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. • Ideally Councils should nominate local administrators for adding, deleting staff and password control. Halarose could then be asked to make appropriate changes to security for those actions		
10.8 Not closing down Eros processes; preventing later user login.				• 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. However as busier election times 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	Depute ERO	Jan 2010

				rectified or allow back-up processes to be temporarily rescheduled			

11. Polling day							
11.1 Polling day enquires from the public or from election staff	4	1	4	• Ensure expert staff available on election day • IT availability on election day depending on RO requirements • Ensure IT and other staff are aware of named contacts in Election Offices • Pre agree (well before the election) with election offices the procedures for correcting clerical errors	ERO/Depute ERO	From Dec 2010
11.2 Problems with voter dissatisfaction or aggressive behaviour	2	2	4	• Provide guidance to frontline staff, including FAQs to assist with giving answers to common queries • Provide guidance on dealing with aggressive customers, drawing on resources developed by other council departments	Team Leader	Dec 2010
11.3 Mistakes by RO staff, PO, & PC	3	2	6	• Suggest ERO staff are involved in pre-election training so that it covers relevant aspects of	Depute ERO	Aug 2010

			• registration and register display • Ask for draft of election notices and Council advertising of registration before publication. • 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" • Feedback forms from Election Day staff re problems to form part of post election review. • Post election review to be held within 14 working days of polling day	
11.4 Polling station fire or similar disruption during election day	2	3	6	• If register destroyed, duplicate can be provided by RO staff from original copy supplied, or can request Depute ERO to provide a fresh copy.	Election Team (Depute ERO if requested)	As required