

Committee(s): Policy and Resources Committee	Dated: 7 November 2024
Subject: Review of Polling Districts and Polling Places	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	3 & 4
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Comptrollers & City Solicitor	For Decision
Report author: Alice Loynes - Comptrollers & city Solicitors Dept	

Summary

As required by the Representation of the People Act 1983 (as amended by the Electoral Administration Act 2006) the City of London Corporation is undertaking a statutory review of the Corporation's polling districts and polling places. The Corporation must undertake and complete a review of all polling districts and polling places in its area within a 16 month period commencing from 1 October 2023 to 31 January 2025. The last review was completed in 2019.

Having followed the statutory process, this report make recommends no changes for the future arrangements for polling stations and polling places in the City to be used in National and London-wide elections.

The existing City of London Ward boundaries and the polling places used for City Ward elections are not included in the scope of this review.

Recommendation(s)

The Committee are asked to:

- Agree the recommendations in the (Acting) Returning Officer's Report (set out in Appendix 1), that no change should be made to the boundaries of the polling districts, and that no change should be made to the location of the polling places within the polling districts.
- Approve any changes to Polling Places to be made under Delegated Authority by the Comptroller and City Solicitor, in consultation with the chair and deputy chairman, where a venue is unavailable and an election is called at short notice.

Main Report

Background

1. As required by the Representation of the People Act 1983 (as amended by the Electoral Administration Act 2006), all local authority Returning Officers must undertake a statutory review of polling districts and polling places.
2. The Electoral Registration and Administration Act 2013 introduced a change to the timing of compulsory reviews of UK Parliamentary polling district and polling places. Returning Officers must undertake and complete a review of all polling districts and polling places in its area within a 16 month period commencing from 1 October 2023 to 31 January 2025. The last review undertaken by the City of London Corporation was completed in 2019.
3. The City of London electoral area is currently geographically divided into four polling districts. Polling district AL is situated in the Western part of the City and covers the Bread Street, Castle Baynard, Cordwainer, Farringdon Within, Farringdon Without, Queenhithe and Vintry Ward areas. Polling district BL is situated the North of the City and covers the Aldersgate, Bassishaw, Coleman Street and part of the Cripplegate Ward areas. Polling district CL is located in the Eastern side of the City and covers Aldgate, Billingsgate, Bishopsgate, Bridge and Bridge Without, Broad Street, Candlewick, Cornhill, Dowgate, Langbourn, Lime Street, Portsoken, Tower and Walbrook Ward areas. Polling district DL in the North of the City and consists of the Golden Lane Estate in the Cripplegate Ward.
4. Electors in the AL polling district currently vote at St. Bride Foundation, 14 Bride Lane, London, EC4Y 8EQ. Electors of the BL polling district currently vote at St. Giles Cripplegate Church, Fore Street, Barbican, EC2Y 8DA. Electors in the CL polling district currently vote at the Portsoken Community Centre, 20 Little Somerset Street, London, E1 8AH. Electors in the DL polling district currently vote at the Sir Ralph Parring Centre, Golden Lane Estate, London, EC1Y 0SH. Appendix 3 shows a map of the current polling districts and polling places.

Current Position

5. The Chief Executive of Westminster City Council, is the (Acting) Returning Officer for the Cities of London and Westminster Parliamentary constituency and has asked that Ian Thomas CBE, Town Clerk and Chief Executive of the City of London, act on his behalf to submit a report on the review relating to the City of London Corporation.
6. The (Acting) Returning Officer's report recommended that the arrangements in terms of the boundaries of the four polling districts remain unchanged, and that the locations of the polling places across the City of London remain unchanged.

7. Upon publication of the report, In accordance with the statutory requirements contained in Schedule A1 for the Representation of the People Act 1983, the City of London Corporation took the following steps:
 - Consulted with the (Acting) Returning Officer for the Cities of London and Westminster, Stuart Love, on the existing arrangements and proposals for the report. He asked the Town Clerk to act on his behalf and produce a report on the arrangements in the City of London. The report of the (Acting) Returning Officer (Appendix 1) was published and considered issues including polling place access, facilities and location of polling places. It also considered current elector numbers, and residential developments in the City that had received planning permission.
 - Published a Notice of Review on 22 August 2024 (Appendix 2). This was published on the City of London website and hard copies posted on all Ward Notice Boards. The notice advised that the (Acting) Returning Officer's report had been published and that registered electors in the Parliamentary Constituency could make representations regarding the existing and proposed arrangements by no later than Friday 4 October 2024.
 - Contacted all Members, the constituency MP Rachel Blake, the GLA constituency representative Unmesh Desai, and local constituency political parties via email regarding publication of the Notice and the (Acting) Returning Officer's report, advising that they could make representations regarding the existing and proposed arrangements by no later than Friday 4 October 2024.
 - Contacted the Equity Equality Diversity and Inclusion (EEDI) Team and City of London Access Group (COLAG), to review the report and consider any access issues that could cause difficulties for electors.
8. As part of the Review, an audit of all the existing polling places was conducted. The audit examined the suitability of the polling places in terms of facilities and access for all voters including disabled voters. The polling places in polling districts CL and DL have good disabled access with flat entrance from the street to the polling station. Access to the polling place in polling district BL, St Giles Cripplegate Church, is via either steps or a ramp leading to the entrance to the polling station, providing good disabled access to the building. Access to the polling place in AL, St Bride Foundation, is accessible from the entrance on Salisbury Court. Directions are provided on poll cards and signage is displayed directing voters to this entrance.
9. The current polling places were most recently used at the UK Parliamentary election on 4 July 2024. No issues were reported regarding accessibility at any of the polling places for this election.
10. In response to the various consultation notices (i.e. website, Ward Notice Boards, emails to Members etc.) the City of London Corporation can confirm it received nil return.

11. A further consideration is that the Electoral Commission recommends that the number of electors allocated to each polling station should not exceed 2,500. Currently, the electorate allocated to each polling station falls well within that limit at each polling station. As part of the review the level of residential development that had been granted planning permission was looked at. While there is due to be some residential development in all four polling districts, this development will not increase the electorate at each polling station to a level higher than the Electoral Commission's recommendation.
12. Finally, in addition, since the last review in 2019, there have been two snap Parliamentary elections held. The Electoral Services Team must hold an election in a 5 week timetable. This can make it impossible to guarantee all Polling Stations will be available to able to accommodate a polling station. For example, in 2019 St Giles Cripplegate was unable to accommodate a polling station, and the City of London School for Girls were available so were used instead. In these circumstances, it is proposed that decisions can be made under delegated authority by the Comptroller & City Solicitor where appropriate, in consultation with the chair and deputy chairman. This is to ensure that the most suitable venue to can be booked and electors can be given the maximum amount of notice possible. Delays to decisions on polling stations can stop poll cards being sent on the earliest possible date.
13. If approved today, the review of Polling Districts and Polling Places will conclude. Certain persons have a right to make representations to the Electoral Commission to appeal the decisions made. Details of the appeals process can be found on the Electoral Commission website:
<https://www.electoralcommission.org.uk/reviews-polling-districts-polling-places-and-polling-stations/polling-place-review-appeals-process>.

Options

14. Approve the suggested schedule of Polling Districts and Polling Places (as set out in the (Acting) Returning Officer's Report at Appendix 1) to remain until the next review in 5 years. Allow for any one off changes to Polling Places to be made under Delegated Authority where a venue is unavailable and an election is called at short notice. Members could approve the schedule, but reject the request for delegated authority, however, in doing so – in the event that a one-off change is required, it is likely that a request would be required under urgency in any event.
15. Reject the suggested schedule of Polling Districts and Polling Places (as set out in t (Acting) Returning Officers report, however as there are no recommended changes, the schedule of Polling Districts and Polling Places would remain the same as enacted in 2019.

Proposals

16. The report of the (Acting) Returning Officer recommended that no changes be made to the boundaries of the four polling districts. No responses were

received during the consultation period advising that any of the boundaries should be altered.

17. The report of the (Acting) Returning Officer considered the polling places that are currently used in Parliamentary Elections in the City of London. The locations of the polling places in the polling districts is shown on the map in Appendix 3. One of the principles of the City of London Corporation's approach to review was to retain, as far as possible, the current location of polling places to minimise disruption to the voters. No responses were received during the consultation period to advise that the current polling places were not suitable for use as polling places, or to suggest alternative venues.
18. It is therefore proposed that there are no changes to the four polling places used in the City of London, and they continue to be St. Bride Foundation, St. Giles Cripplegate Church, Portsoken Community Centre and the Sir Ralph Perring Centre.
19. Since the last review in 2019, there have been two snap Parliamentary elections held. The Electoral Services Team must hold an election in a 5 week timetable. This can make it impossible to guarantee all polling places will be available to be able to accommodate a polling station. In these circumstances, it is proposed that decisions can be made under delegated authority where appropriate.

Corporate & Strategic Implications

Financial implications – None.

Resource implications – None.

Legal implications – In relation to the proposals surrounding the Schedule of Polling Districts, the legal position is set out in the main report. In relation to the specific request for delegated authority, if approved, it will mitigate the risk associated with failing to secure suitable polling station in good time. If we are unable to secure a suitable polling station, this will happen...

Risk implications – Reputational risks associated with the issues set out within the legal implications.

Equalities implications – Due consideration to the Equalities Act 2010 was exercised throughout the necessary consultation and is considered at all times when undertaking work to deliver statutory elections. An Equalities Impact Assessment is not required as there are no changes proposed to service provision.

Climate implications – None.

Security implications – None.

Conclusion

20. A review into the polling districts and polling places of the City of London has been carried out in accordance with the Representation of the People Act 1983 (as amended by the Electoral Administration Act 2006).

21. During the review, an audit of the current polling places was carried out, which identified no issues that would prevent the Corporation from continuing to use the current polling places for future elections.
22. Members are therefore asked to agree the recommendations in the (Acting) Returning Officer's Report, which recommends that no change is required to the boundaries of the polling districts, and that no change is required to the location of the polling places within the polling districts.
23. Members are also asked to approve changes to polling places be made under Delegated Authority by the Comptroller and City Solicitor, in consultation with the chair and deputy chairman, in cases where an election is called at short notice and a current polling place is unavailable.

Appendices

- Appendix 1 – (Acting) Returning Officer's Report
- Appendix 2 – Polling District Review Notice
- Appendix 3 – Map of Polling Districts and Polling places

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