

Draft performance standards for Returning Officers and updated performance standards for Electoral Registration Officers

Deadline 26.August 2022

Response on behalf of Learning Disability Wales

Learning Disability Wales is a national charity representing the learning disability sector in Wales. We work with people with a learning disability and their families, Welsh Government, local authorities, disabled people's organisations and the voluntary sector to create a better Wales for all people with a learning disability.

Contact

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Or response

- Are the standards focussed on the right outcomes? If not, what outcomes should be reflected?

We believe that the standards chosen overall are good ones and that it is important that everyone who is eligible is enabled to vote and stand for election. However, we are somewhat concerned that there may be too much emphasis on trust and perceived reliability and not enough on inclusivity.

- Will the proposed approach to how the Commission will use the standards to engage with ROs enable the identification and provision of effective support and challenge?

The overall guidance seems partially suitable to the goals set out. However, the guidance is often quite vague and does not specify what concrete measures will be taken to enable people from all backgrounds to take part in the democratic process.

We are also concerned that the guidance does not acknowledge that not everyone faces the same obstacles to voting or standing for election. The

guidance should acknowledge these different obstacles for people accessing voting and standing for election. It would be good for this guidance to include specific measures designed to support marginalised people to participate in elections.

It is also important to recognise that while many people struggle to take part in elections, not everyone struggles for the same reasons. It is therefore important that a variety of people and groups are consulted on how to make the democratic process more accessible.

In this guidance we would like to see plans to reach out to marginalised communities and make sure everyone has information that is accessible to them. It is disappointing not to see more concrete guidance here. It is important to note that in order to ensure everyone eligible to vote or stand for election will be able to do so, it will be necessary to actively engage with communities that face different forms of discrimination and marginalisation (for example racism, disablism, and sexism).

- Is there anything more or different the Commission should be using the standards to do?

As outlined above, we think the standards should have more of a focus on supporting people who have often been excluded from the democratic process. We also think the standards could be more concrete in making sure accessibility is given a more central role.

Within outcome 2 you write about different ways to provide information to voters as well as producing election material. We would like to you to add a specific point in here about how ROs should pay special attention to disability accessibility and making information simple to understand. While specific disability accessibility is important here, we would also like to see a commitment to produce all material in plain English and plain Welsh.

- Do you think the proposed approach to reporting would support transparency, promotes confidence that elections are well-run and enable the sharing of good practice?

It would be good to clarify that you want the election process to be well managed and the results to be accurate, not just that people *perceive* them to be. This might seem like a minor difference, however I think it is a difference worth pointing out. Technically, in their current form the fourth outcome is only that “everyone has confidence” in the process, not that the process is reliable in itself.

While it is good to make sure that people are well informed about how elections work, there is a need to balance trust in elections with inclusion. This will be particularly important in the face of the new requirement to present ID when voting. This change [will make it much harder for poorer people or people from marginalised communities to take part in voting](#). The Electoral Commission should be committed to trying to address some of these inequalities.