

# Quality Assurance of the production and delivery of election materials

## **Purpose**

This guidance is designed to help Returning Officers quality-assure the process of producing election materials and provides an overview of the key points that will need to be considered when working with suppliers. It is important to remember that when outsourcing the production of electoral material, you remain responsible for ensuring that all material is accurate and produced in accordance with the legislation. You should therefore ensure that you have arrangements in place which enable you to quality-assure the whole process.

More information on planning and managing the production of election materials can be found in Parts B, C and D of our <u>core guidance for Returning Officers</u>, and in our <u>contract development checklist</u>, <u>proof checking factsheet</u> and our <u>data protection resource</u>.

### Contractual arrangements

It is important to ensure that, following any formal procurement processes required, you establish a formal contract with all suppliers that you use to produce or deliver electoral material, and that you and your team are familiar with the details of the contract and have a copy you can refer to throughout the election period. As well as being required under current data protection legislation in relation to sharing and processing of data you hold, formal contracts ensure that both parties have clarity over their roles and responsibilities and promote a shared understanding of the work being delivered. This is key in providing you with a framework for quality-assuring the process.

Details of the standard areas that should be covered in contracts can be found in our resource on <u>contractual arrangements with suppliers.</u>

In addition to basic details regarding the products and services being delivered, such as specifications, quantities, timeframes and cost, you should check that your contract contains some specific information to support the quality assurance process:

- Details of business continuity plans (BCPs) which outline how your supplier will
  continue operating during an unplanned disruption in service. The detail may be held
  outside of your formal contract, but you should ensure that you get assurance that such
  BCPs exist, and ideally you should be able to view these for your own reference.
- Details of service level agreements (SLAs) which define exactly what services a supplier will provide and the required level or standard for those services. For example, this may include details of how quickly emails will be replied to, cover your rights to

access supplier premises for the purposes of carrying out quality assurance checks, agree the amount of slippage for any deadlines that is permitted by both sides under the contract, and how any failures to meet SLAs will be dealt with, both in terms of delivery and any related compensation. Such SLAs will help define what you can expect as a customer and how you and your supplier will work together.

- Details of data protection arrangements which cover the specifics of the data to be
  processed, including the types of data, the duration of the processing and the rights and
  obligations of both parties. This should also, include instructions for deleting data after
  the processing has been completed. It is a legal requirement under current data
  protection legislation to formalise the working relationship with suppliers contracted to
  process data you hold, in a written contract. Further guidance on data protection
  considerations when working with suppliers/contractors can be found in our data
  protection resource for ROs and EROs
- Agreement over the use of any sub-contractors for delivery of services. For election suppliers this could be in relation to production, fulfilment or delivery of materials. Whilst the use of sub-contractors is commonplace to many industries, and should not in itself be a cause of concern, it is important that you are aware of whether your suppliers utilise the services of sub-contractors and the quality assurance processes they have in place to ensure that any work delivered by third parties maintains the standards as set out in your contract with them, including data protection and secrecy requirements.

## Before the poll

As part of your preparations for the delivery of the poll, you should check in with suppliers to finalise arrangements well before the start of the election period. This is especially important if you have long-standing contracts in place and you should check that all contractual arrangements are still appropriate and fully meet your requirements, or if there have been changes of personnel on either side.

As part of the pre-poll check in you should cover:

- Who the key contacts are from each side, and who can be contacted when the primary contacts are not available (including out-of-hours) to ensure that work progresses without unnecessary delay
- The timeline for all stages of the work to be delivered, including:
  - When you will provide data and other information to the contractor
  - When each round of proofs will be provided to you for each item being produced, and the deadline for you to undertake your checks and respond for each
  - The printing and fulfilment windows for each item, including when and how quality assurance checks will take place at each stage
  - The despatch window for each item, including likely delivery dates given the delivery service to be used and the quantities being despatched on each date
  - The management of files of additional electors/electors to be removed from the data (where applicable)
- Any proposed use of sub-contractors; including in relation to the use of downstream access providers (DSAs) for the delivery of materials to electors
- The formats and communication channels to be used to provide information to suppliers (especially data from your EMS), share proofs and provide confirmation of receipt of data, items or sign-off of proofs etc. throughout the process, and for confirmation of despatch of items. This is important to agree in advance to support a clear audit trail of each stage of the process
- The exact specifications for each item being produced; items such as ballot papers must, by law, be printed in accordance with the directions for printing in the appendix to

- the relevant election rules. For example, you should check with your print supplier the maximum size of ballot papers that they can produce and what contingency arrangements will be in place should longer ballot papers be required
- How you will inform each other of any issues that arise, and the escalation process involved for decision making and resolution if needed.

Once you have agreed on all of the particular arrangements as above, you should produce a written document which contains all of the details and can be referred to throughout the process to ensure every stage is managed and delivered as per your mutually agreed specifications. It is important to remember that the agreed deadlines will apply to both parties, so you will need to make sure that you carry out all required actions on the dates agreed to support the completion of the work to the agreed timetable.

### Production and delivery

As you move into the production and delivery phase, you will be working very closely with your suppliers, often against demanding deadlines, and obviously alongside all of your other responsibilities for the delivery of the election as RO.

To help you quality assure each key phase of the production and delivery process, there are a number of things you can consider:

#### **Proof-checking**

- It is vital that you undertake careful and thorough checks of all draft proofs of your
  printed material before you sign it off ready to be printed and despatched. This is often
  a very time-consuming and time-critical stage of the process as your suppliers will be
  working to tight timetables and will likely give you hard deadlines, but to ensure the
  accuracy of materials it is important to consider the following:
  - Decide who from your team will be involved in the checking of proofs due to the number of proofs that may be involved it is possible that you will need a number of team members to play a role, and it may be helpful to involve others not as close to the raw data/candidate information or base proofs to ensure that nothing is missed
  - Where possible it is helpful to ensure that more than one person checks each set of proofs before approving them to ensure that errors are spotted – this is especially helpful in mitigating the risk of errors being made when turning around a large number of proofs in a short timeframe. You may find working in pairs or teams to be useful
  - o It can help to use a checklist of things to check for each type of proof to ensure that the proofing process is conducted consistently, and to train new staff on how to carry out the checks in practice. We have produced a <u>proof-checking factsheet</u> to support you in carrying out robust proof-checks of all election material
  - Ensure you check the 'base' text of all drafts carefully; this is the text that will not change regardless of contest, number or details of candidates, or elector information. You should not presume that this text is correct and does not need detailed checking; whilst suppliers will of course endeavour to provide accurate proofs, it is your responsibility to check all information is accurate and that the size, design and layout meets all legislative requirements
  - o For efficiency reasons, some suppliers may produce your proofs for the current set of polls from templates used in previous years – as such it's important that you check that all of the information included on the draft has been updated as needed and is current and correct. For example there may have been legislative changes or local boundary changes or changes to your contact information or other local notes to the elector since your last set of polls

- You should also pay particular attention to dates included in proofs as these will have changed from your last set of polls but at first glance may not be spotted as incorrect, especially if relating to scheduled May polls which have similar dates each year
- You will likely have many sets of proofs for the same item, such as poll cards or ballot papers, to check that variable text has been correctly included. It is helpful to have a spreadsheet of all of the variable text per version ready for checking against, for example, a sheet detailing all of your contested elections, number of vacancies, candidates' names and descriptions. It is important to pay particular attention to emblems as many may look similar at first glance. Any spreadsheets should have been carefully proofed against original data, such as nomination papers
- You should have in place a process for checking live proofs of all forms of election material at the print stage to check that there are no errors and that they are being printed to the required specification. This should include items that have smaller print runs too, such as tendered ballot papers, postal proxies or additional postal vote print runs to include those who applied after the initial data files were provided. In addition, carrying out all of the checks as detailed in the proof-checking factsheet at the live proof stage will allow staff to check that the print run reflects the latest approved version of the item, that there is no bleeding of ink and the print quality is good and consistent
- Make sure you keep a record of stationery that has been checked to provide a clear audit trail of the processes that have been undertaken and which you can refer back to should any issues subsequently arise

#### Final checks before despatch to electors or use at polling station

- To ensure that all materials have been printed, collated and prepared for despatch to
  electors or for use at polling stations are without errors, there are a number of basic
  quality assurance checks that can be undertaken
- You can carry out checks in person by attending the premises of your supplier and
  accessing your printed material directly, though some suppliers may offer to conduct
  these checks for you as part of their service instead. Alternatively, you may have
  materials sent to you for checking before they are despatched from your premises.
  Where you are using suppliers to conduct checks, you must ensure that you get a
  detailed breakdown of the checking process including:
  - What print quality checks are being undertaken this should include checking that the printed material is accurate by checking against a specimen copy of the final signed off live proof for each version of the material and, where necessary, checking that all personalised text has been printed correctly
  - What fulfilment checks are being undertaken this should include checking that ballot paper and PVS numbers align, personalised name/address information appears as expected in windows, and that each pack contains the correct items – for example that the correct ballot papers and reply envelope have been included
  - O How many items will be checked for each item/print-run/fill? As a minimum, for print checks, at least the first and last item for each version of the item should be checked to ensure that the print runs start and end as expected, and for checking of filled ballot packs, at least two packs pulled at random from each batch of 250 packs (which is roughly the equivalent of a full Royal Mail postal 'tray'). Random spot checks should also be carried out across all material/packs to ensure a representative cross-section has been checked. This includes ensuring that there are specific checks of any fills that include additional items, such as where a by-election means an additional ballot paper is being included

- Details of the audit-trail that will be kept of the quality assurance checks being undertaken on your behalf
- When carrying out in-person checks, you or your staff should ensure that you carry out
  the same level of checks as detailed above as a minimum, and that you have a clear
  audit trail of the checks you have carried out

#### Quality assurance of the delivery phase

- Where your supplier is despatching materials to electors on your behalf, it is important
  that you continue to liaise with them once final sign-off of all printed/filled material is
  completed and ready for despatch
- You should ensure that you get confirmation from your supplier once despatch has begun, confirmation of how many packs have been/will be despatched per day and an update on how long it will take for the despatch to be completed for each type of item/pack
- To support your quality assurance process, you should ask your supplier for a copy of the postal dockets for each despatch for adding to your formal audit trail of the process. These dockets should detail the number of items despatched per day, and confirm the postal services used. Photos/scanned images of the dockets will suffice for these purposes
- If you have agreed with your supplier that DSA providers will be used as part of the
  despatch and delivery process, you should get updates from your supplier on the
  progress of the delivery throughout
- All of these measures will help to identify any possible issues that may have arisen with regards to despatch, feed into any subsequent evaluation of contractor performance, and enable you to provide information to voters on dates that they should expect to receive material through your social media channels and call centres as appropriate
- You should also ensure you monitor the level of queries from electors being received through all channels as this will help to highlight any issues being experienced with the delivery of materials in practice

## Managing issues

Whilst having robust quality assurance measures in place will help to ensure that supplier services are delivered correctly, it is important to be prepared for managing any errors or issues that may arise.

- As soon as you are made aware of an issue, either through escalation from your supplier, or through contact with electors, it is important to talk to your supplier to try to understand the scale and scope of the issue, and consider your pre-existing contingency plans as appropriate, as this will impact on your decision making on how to resolve the issue
- Before making any decisions on what action to take, it is important that you <u>contact us</u>
   at the <u>Commission</u> so that we can discuss the issue with you and provide tailored
   advice and support in how to manage it
- Once you have all of the relevant information, have taken the appropriate advice and have made a decision on what action to take, you should agree plans with your suppliers accordingly and keep in close contact as these contingency plans are carried out. This may involve needing to re-check and approve proofs, or data figures or similar very urgently – but it is important that you still ensure that QA checks are carried out to prevent any further errors
- You will also need to consider what additional communications may be needed for electors or candidates and agents as a result of the issue; again this is something that

Commission contacts can help you think through so it is important that you contact us to discuss at the earliest opportunity.