



BCE/2018/1st meeting

BOUNDARY COMMISSION FOR ENGLAND

Notice of meeting

A meeting will be held at 35 Great Smith Street, London on Thursday 22 February 2018, at 14.00.

Agenda

1. Welcome (AN)
2. Programme update (14.05) - **Paper 1** (TBe)
3. Evaluation of communications strategy in revised proposals consultation period (14.20) - **Paper 2** (SH)
4. General Data Protection Regulations and information management review (14.45) - **Paper 3** (TBe)
5. Arrangements for closing stages of 2018 Review (15.15) - **Paper 4** (TBe)
6. Regional summaries of revised proposals consultation responses (16.00) - **Paper 5** (TBo)

Close (17.00)

Sam Hartley
Secretary to the Commission

15 February 2018

2018 Review Programme Update

1. Programme documentation will be provided to Commissioners for all scheduled Commission meetings, and will also be sent to them at regular intervals in between. The standard suite of documentation will be as set out in this paper.

Update since the last meeting

2. Commissioners last met formally to consider general business on 4 May 2017 (with specific meetings in July to agree your substantive revised proposals). The operational highlight since that meeting has been publication of the revised proposals for constituencies on 17 October 2017, followed by eight weeks statutory public consultation, supported by our consultation website and significant publicity work (see separate paper for analysis of publicity activity). Final count of responses to the revised proposals consultation was 10,729.

Timetable (Project plan)

3. The timetable for the remainder of the 2018 Review is set out at **Annex A** in the form of a project plan. The project plan is a 'living document', which is expected to reflect changes in the timetable as they are required. Dates and the description of activities will therefore generally be more broad the further away they are in time, becoming more specific and detailed as they come closer.
4. Commissioners at their meeting of 25 April 2016 approved the 'baseline' plan for the review. Annex A is the most recent update to that baseline. We are pleased to report that progress of the review to date has been on track with that anticipated in the baseline plan. New information in this updated version therefore lies in the added detail of target dates inserted for the final stages of the review, i.e. steps of development of the final recommendations, and production and submission to Government of your final report on the 2018 Review.
5. A separate paper for this meeting considers in more detail the arrangements for concluding the 2018 Review and submission of the final report.

Risk register

6. Good management of the review involves use of a specific risk register to expressly identify and track both the key risks to the success of the project, and the mitigating actions taken to keep those risks within acceptable levels.
7. The risk register for the 2018 Review is at **Annex B**. Whilst this remains pitched at a strategic level appropriate for Commissioners' consideration, we have sought to add some additional detail to ensure the document is sufficiently comprehensive for Commissioners to have a good understanding of the nature of the main risks the review faces, mitigation action taken, the current severity of each, the trend (i.e. getting better or worse), and what level of risk is considered acceptable for each. As with the project plan, the risk register is also maintained as a 'living document', with new risks added as they may arise, and ongoing risks modified as they decrease/increase.
8. The most significant current risk to successful delivery of the 2018 Review (albeit one which we have no realistic ability to influence) is that the Private Member's Bill from Afzal

Khan MP is passed, the effect of which would be to terminate the current review, and restart afresh (using amended rules).

Highlight report

9. The Highlight report at **Annex C** is the key 'one-pager' summary document where Commissioners can see at a glance all the most recent developments in relation to the project, whether that be new activities, changes to significant risks, and/or shifts in the projected delivery dates for certain activities or milestones.


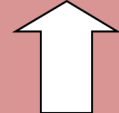
Frequency

10. In addition to issuing all three documents for scheduled Commission meetings, as agreed at the previous meeting, the project plan and risk register are issued to Commissioners on a quarterly basis, and the highlight report issued monthly. Any matters of a particularly notable or pressing nature are, of course, raised with Commissioners directly outside of this regular information stream, via the Secretary or other member of the senior staff.

2018 Review Project Plan											
		2017	2018								
		Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Review work											
	Collate data, check and publish figures (24 Feb)										
	Teams develop outline schemes										
	Teams review outline schemes with senior management										
	Teams refine schemes and draft initial proposals paper										
	Walk Commissioners through initial proposals (w/c 13 June)										
	Finalise initial proposals and prepare for publication										
	Publication and 12-week consultation 13 Sept - 5 Dec										
	Prepare responses for publication										
	Publish responses and four-week consultation 28 Feb - 27 Mar										
	All responses entered into consultation portal by 7 April										
	Review teams brief SLT 18 Apr-12 May										
	Review teams brief ACs (inc determining site visits) 2-26 May										
	Lead AC meeting with SLT w/c 5 June										
	Review team and AC site visits 8-30 June										
	Commission meetings to agree revised proposals w/c 10, 11, 17 & 18 July										
	Revised proposals reports to Commission by 28 July for clearance with DE and NP 31/7 & 1/8										
	Reports text cleared and to printer by 11 August for typeset and print										
	Hard copy reports in office by 18 Sept for dispatch preparation										
	Publish revised proposals then eight-week consultation 17 Oct - 11 Dec	X									
	Analysis of responses to revised proposals	X	X	X							
	Region teams work with lead Commissioner to develop recommendations - meetings 22 February, and 1,5,6,26-29 March			X	X						

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2018 Review Project Plan											
		2017	2018								
		Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
	Run public hearings										
	Website hosting transition to GDS										
Comms											
	Note to EROs about local boundary changes, PD mapping, and register output										
	Agree policies with Commission										
	Pre-launch meeting(s) with political parties										
	Agree and publish UK figures with other PBCs										
	Prepare 'Guide to 2018 Review'										
	Publish 'Guide to 2018 Review'										
	Consult on initial proposals (statutory) 13/9 - 5/12 (PH 11/10 - 21/11)										
	Secondary consultation (statutory) 28/2 - 27/3										
	Consult on revised proposals (statutory) 10/10 - 4/12	X									
	Statutory annual progress update		X								
	Publish Annual Report							X			
	Publish final report and recommendations (Sept 2018)										X
Finance											
	Spending Review 2015 negotiations										
	Build budget for coming financial year		X	X	X						
	Finalise figures for previous financial year					X	X				

Strategic Risk Register: 2018 Review of Parliamentary Constituencies															
1	2	3	4	5,6,7 - Inherent Risk			8	9	10	11,12,13 - Residual Risk			14	15	16
Risk ID	Title	Description / Indicators	Owner	Impact	Likelihood	Severity level	Response	Controls	Mitigation status	Impact	Likelihood	Severity level	Risk trend and status	Appetite	Actions required
	Broad title	Description of risk and / or indicators	CLT member	Severe; significant; moderate; minor; insignificant	Negligible; remote; possible; likely; almost certain	Red; amber; green	Transfer; tolerate; treat; terminate	Internal controls	Red; amber; green.	Severe; significant; moderate; minor; insignificant	Negligible; remote; possible; likely; almost certain	Red; amber; green	Trend: Reducing; increasing; static; new	Red; amber; green	Actions required to ensure that residual risk = appetite
1	Legal challenge to BCE	A legal challenge to the review policies or procedures delays the delivery timetable and/or demands additional staff / financial resource to address	SH	Significant	Possible	12	Treat	1. Review of all internal policies and procedures; 2. production of Guide clearly outlining policies, practices and legal obligations or interpretations; 3. Equality Analysis conducted; 4. legal advice sought when appropriate (e.g. GDPR implementation); 5. Commission meetings and associated communications with qualifying political parties; 6. regular quality assurance of internal procedures		Significant	Remote	8		8	
2	Legislative change	Changes are made to the primary legislation governing the structure of the Commission and/or the procedures for a review, potentially terminating an ongoing review. Afzal Khan MP's PMB achieved Second Reading 1 December 2017, and if passed would terminate 2018 Review.	SH	Severe	Possible	16	Tolerate	Good communications with Government (sponsor team) and political party representatives to ensure earliest possible knowledge of any prospective changes, and that parties and individual MPs understand consequences of their actions.		Severe	Possible	16		9	As legislative change is ultimately a matter for Parliament, there is realistically little mitigating action that the Commission can (or should) take to prevent it.

Strategic Risk Register: 2018 Review of Parliamentary Constituencies															
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3	Human resource	Insufficient numbers and expertise levels of Commissioners, Assistant Commissioners and staff inhibit the delivery of the review	TBe	Severe	Possible	16	Treat	1. Regular review of staffing needs against resource plan; 2. close working with CO to fill vacancies that arise; 3. engagement of staff through staff survey; 4. broaden knowledge and capacity of retained staff; 5. capture knowledge of departing staff; 6. contingency planning for premature loss of key staff		Moderate	Remote	6	↔	8	
4	Financial, physical and data resource	Inadequate budget, physical accommodation or information management leads to inability to deliver review to quality and timescale required	TBe	Significant	Possible	12	Treat	1. initial budget against project plan; 2. monthly review and reconciliation meetings with CO finance; 3. scrutiny of spend requirements to ensure value for money; 4. forward planning of accommodation needs and clear advance communication of those to CO; 5. clear information management policies communicated regularly to staff and enforced		Significant	Negligible	4	↔	5	
5	Technology	Hardware and/or software (particularly GIS and consultation website) unfit for purpose, leading to significant delay to the timetable and/or reputational damage	TBo	Severe	Possible	16	Treat	1. clear and detailed supply and maintenance contracts with suppliers; 2. ongoing review of appropriate enhancements and improvements to software.		Significant	Negligible	4	↓	4	

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Programme management - BCE 2018 Review Highlight Report 26

January 2018

Achieved / delivered (Good news/highlights)	Key risks / issues (Including mitigation)	Forward look (Activity over the next period, update on whether on track in the immediate/long term and status of significant milestones)
Schemes and Representations		
<ul style="list-style-type: none"> Finalise initial high-level analysis of final consultation responses, and prepare briefing papers for Commissioners. 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Commence detailed analysis of responses in individual regions with lead Commissioners.
Communications and Stakeholder Management		
<ul style="list-style-type: none"> PACAC hearing evidence session on 9 January for all four Commissions (plus follow-up letter clarifying certain points) 	<ul style="list-style-type: none"> Afzal Khan MP's Private Member's Bill to restart review with amended rules achieved Second Reading on 1 December: maintain factual line that review must continue until such time as primary legislation stops it. Statutory process for final report may inhibit BCE's ability to control publication and awareness-raising activity: seeking formal handling agreement with Cabinet Office. 	<ul style="list-style-type: none"> Relatively low-level outward-facing comms activity during this internal working and analysis period. Continuing discussions with Cabinet Office about final report handover/laying/publication co-ordination.
Human and Corporate Resource		
<ul style="list-style-type: none"> Detailed internal budget planning for 2018/19 financial year, pending formal negotiations with CO to settle budget. 	<ul style="list-style-type: none"> Further review staff departures may impact capacity: mitigating through working more flexibly across teams. Commissioners need some form of formal performance assessment: Secretary to agree procedure with Commissioners and CO sponsor. Framework Agreement needs to be signed off by CO sponsor. 	<ul style="list-style-type: none"> Continued planning and preparation for May implementation of General Data Protection Regulation.



**Boundary
Commission
for England**

**Communications evaluation:
Revised proposals publication and
consultation**

17 October - 11 December 2017

February 2018

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1. Introduction

The Boundary Commission for England (BCE) is currently conducting the 2018 review of Parliamentary constituencies in England, with the final report due to be submitted to Parliament in September 2018. As part of preparing our recommendations we have held several public consultations to ensure our recommendations both meet the requirements of the legislation and include consideration of public opinion. The last of these consultations ran from 17 October 2017 (when our revised proposals were published) to 11 December 2017. Before and during this period, as we have done throughout the review, we wanted to raise awareness of the review and encourage engagement with the consultation process. This paper evaluates the revised proposal consultation campaign. A full evaluation of the 2018 Boundary Review communications activity will be provided at the end of the review, with overall lessons learned and recommendations for future reviews.

1.1. What we did

Building on the approach used during the first two consultations, a more proactive approach to communications was employed than has traditionally been the case for boundary reviews. In past reviews traditional forms of advertising were used, mainly publication of adverts in key national papers, media interviews were approached with caution, and digital communications weren't considered or initially even an option. For the 2018 Boundary Review we want to ensure awareness of the review is raised and encourage people to contribute to the consultation. In addition, we want the majority of contributors to make representations via the portal (which we are using for the first time). We set an initial target of 70% of all representations being submitted through the portal, rather than email or in hard copy.

1.1.1. Objectives

The aim of the communications throughout was to - 'Inform, engage and educate, while reassuring citizens':

Inform: Ensure key audiences are aware the review is happening. Let as many people as possible know they have the opportunity to have their say and how to do this.

Engage: Encourage citizens to go online or come to face to face hearings to view proposals and discuss and share local ties. Position local people and communities as the experts needed to help shape local areas, ensuring local ties are taken into consideration.

Educate: Reinforce that the boundary review is a fair and trustworthy, process. Convey that the consultation is genuine and does not have a predetermined outcome.

Reassure citizens that 'day-to-day life' won't change for instance their bin collection and local schools.

1.1.2. Strategy

The communications approach utilised multiple channels to reach a wide audience – we primarily wanted to engage those who are currently eligible to register to vote but were also aware there was a secondary audience in those who will become eligible to register to vote between now and the next general election, when boundary review changes would be instigated. With this in mind we chose to proactively engage with national and regional media, place adverts in national newspapers and on radio, support our own social media content with promoted posts on Facebook and Twitter, advertise on local newspaper sites and local council sites and engage with key stakeholders. Each of these is considered in more detail below.

1.1.3. Key messages

- The key messages we wanted to deliver through our revised proposal communications were:
 - The Boundary Commission for England is an independent body that is reviewing proposals to reduce the number of constituencies in England to make them more of an equal size.
 - We need the help of local people and communities to help shape areas ensuring they take into account important local ties.
 - It's easy to help us and have your say. You can view the proposed changes online and have your say in a couple of minutes.
 - You can find out more about the review and the different ways to get involved online at www.bce2018.org.uk.

1.2. Key results

The number of consultation responses during the eight-week revised proposal consultation period can be broken down by how they were received, indicating that **10,749** contributions were made through the portal with only **397** via email and post. Therefore, during the revised consultation **96%** of responses were made directly through the consultation portal. This was an increase on representations made through the consultation portal during the last two consultations, noting that during the initial proposals **88%** of representations were made via the portal during this consultation. Overall, across the three consultations **90%** of all responses were received directly via the consultation portal, far exceeding the target set at the beginning of the review of **70%**.

Online engagement in general was good. The click through rates (CTR - the percentage of people who see our adverts who then click on them) for our paid-for advertising was higher than the average seen in government campaigns and statistics suggest numbers who went on search their postcode was also good. Again this reflects well on our aim to encourage engagement with the review process, although as will become clear the performance dipped slightly during the revised proposal consultation.

As was the case during the initial and secondary consultation periods, the vast majority of media coverage was balanced, helping to present the Commission as trustworthy and independent. Coverage in regional papers made the review relevant to local communities, again encouraging engagement.

These results show that the campaign achieved its objective of encouraging engagement in the review process. Unfortunately, we are unable to track changes in awareness levels. However, it can be expected that awareness of Boundary Reviews was low before the 2018 Review was launched because it's not a campaign about policy or legal obligations that people should already be adhering to (e.g. speed limits, tax returns). Good engagement following the launch of the review would therefore indicate some degree of increase in awareness - although we are unable to put any figures to this. As agreed after the initial consultation, the awareness level was not tracked for the secondary and revised consultation, as there was probably little value to be gained in tracking the levels without an indication of the awareness levels before, during and after the first consultation. Tracking awareness levels during future boundary reviews could be considered if the benefit of the additional insight was likely to improve our communications and evaluation and could justify the spend.

1.3. Key lessons learnt

This report considers the successes and areas for improvement identified in our communications around the publication of our revised proposals and the consultation on these. Our key lessons learnt during the first two consultation periods were:

- Plan early – allow plenty of time to plan communications, both paid-for and in-house. This avoids last minute rushes and allows plenty of time for narrative development and testing.
- Dedicated professional communications support is needed early in the process, throughout the duration of the first consultation and thereafter. This allows them to contribute to planning, implementation and evaluation.
- Measurable objectives should be established for all channels (not just paid-for) to support good evaluation.
- Advertising works well and driving engagement and awareness – especially on local newspaper sites and Facebook.
- Regional media should be considered as important as national media – regional journalists often ran our content when it was tailored.
- Brief hard from the outset – making it clear the Commission is politically impartial and neutral from the outset worked in our favour, ensuring coverage portrayed neutrally.
- The partner pack did not generate as much stakeholder engagement as hoped, questioning whether it is worth the resources. However, dedicating time to building ties with local councils and the Local Government Authority proved more beneficial – these stakeholders were far more supportive than the wider third sector.

The key lessons learnt from the revised proposals consultation are:

- Graphics and moving image digital/social advertising are the most effective.
- Targeting our core audiences is more likely to yield engagement in the review than taking a broader more inclusive approach.
- The highest aim of the advertising campaign should be to drive traffic to our website - experiments with awareness-raising by starting twitter conversations were not as successful.
- Digital radio would have been more effective in targeting particular regions where there was less engagement or particular issues that require more evidence.

2. Media

2.1. What we did

We expected both national and regional media to be interested in the publication of our revised proposals on 17 October, so planned media activity at the beginning of October to focus on gaining national coverage. This included a pre-publication media briefing, circulation of an embargoed press release and allowing media access to the revised proposals the day before publication via a secure website. We then ensured spokespeople (Secretary to the Commission, Deputy Secretary to the Commission, Head of Reviews and two experienced Review Managers, all of whom had undergone media training) were available for all national and regional interview bids from 17 October onwards.

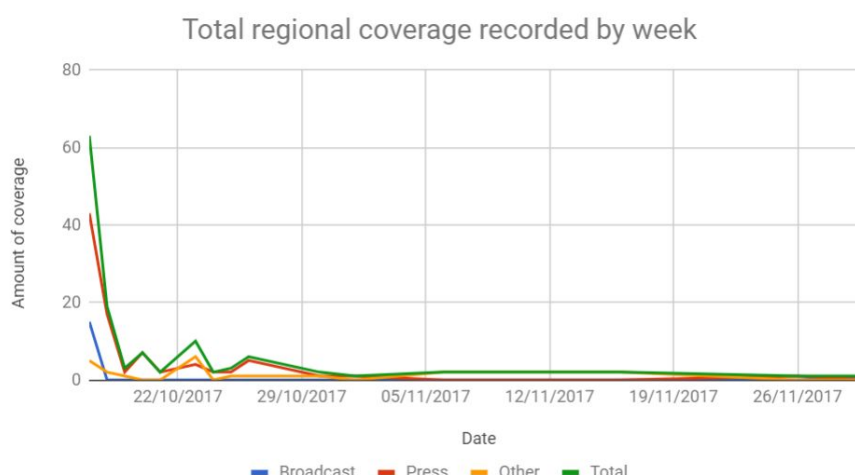
It should be noted throughout that the context of the review had changed somewhat. The general election held in June 2017, and the consequent loss of the government's majority, led to much speculation (and indeed misinformation) that the review was automatically cancelled, or at the least had no chance of ever being implemented. We can only assume or surmise that this had an effect on the engagement and participation rates for the revised consultation period, and indeed media interest.

We anticipated that after 17 October, the national media's interest in the review would wane although that of regional media continue to grow throughout October into November. We therefore focussed on regional radio adverts throughout October and November and "2-weeks to go" press release in late-November on twitter and facebook. There were fewer requests for interviews with local media outlets as the impact of the revised proposal and consultation was not as great as the initial proposal and consultation which included the public hearings.

2.2. Evaluation

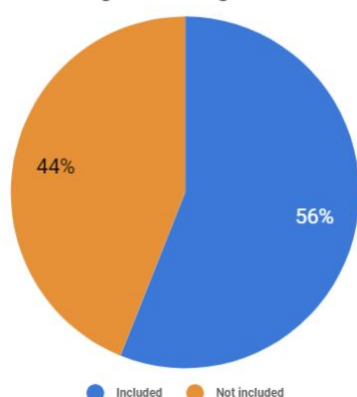
2.2.1. Outputs

Between 17 October and 11 December, we recorded 132 pieces of coverage (this is what we managed to record – there may have been more). This breaks down to 95 pieces in newspapers (online and print), 20 pieces on radio and TV and 17 pieces appearing in other outlets. Over three quarters of this coverage ran in the week commencing 16 October, coinciding with publication of our revised proposals, and almost 70% appeared in regional media, in the preceding weeks to the end of October.

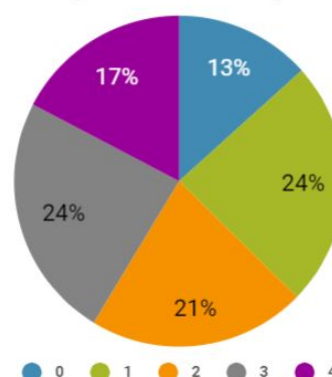


Throughout the consultation the majority of coverage portrayed the Commission in a neutral light. Although the political aspect of the review was reported on in the majority of coverage, it was done so in a way that displayed the Commission’s independence from the political outcomes. Regional coverage was more likely than national coverage to encourage audiences to “have their say” and carry our website address, with over half the coverage carrying all four of our key messages and our website address.

% national coverage including website address/link



% of regional coverage that carried, 1, 2, 3 or 4 of our key messages either in full or partially

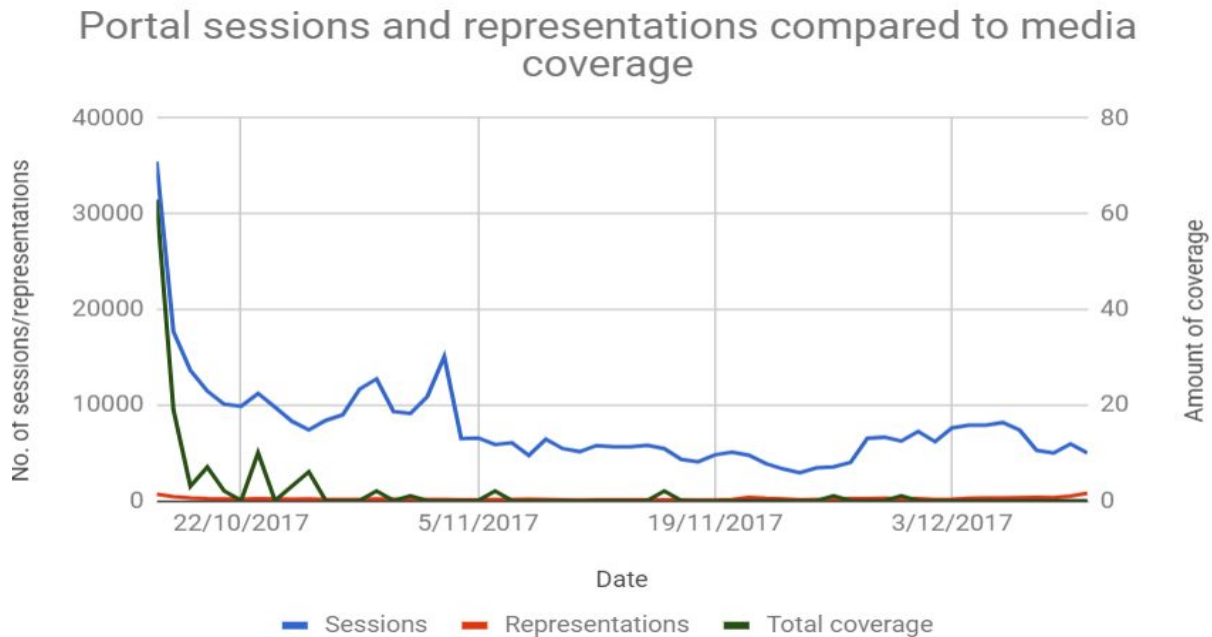


2.2.2. Impact

The impact of our media work is to some extent anecdotal as we are unable to track awareness or compare coverage figures from this review with previous reviews as the data is not available. However, staff who have worked on previous reviews are confident we have received more balanced coverage during this consultation than during past consultations – that the majority of coverage portrayed us in a neutral light and respected our political impartiality supports this.

We are also able to compare levels of coverage with portal sessions and representations made via the portal. The correlation is not very strong, but you can see increase in sessions coincided with increase in coverage at the start of the consultation; although the lack of strength suggests people may read about the review but not necessarily take action straight away. Interestingly, there is a peak in traffic coming directly to

the portal on the 3 November with 15,050 sessions. This was followed by a steady flow in representations.



2.2.3. Lessons learnt

As with the previous consultations, regional media was the most successful channel in terms of quantity of coverage and also produced coverage that resonated on a local level helping to highlight how the changes could affect the public – making them more relatable. National coverage at the start of the consultation was beneficial, as can be seen from the number of portal sessions on the first day of the consultation driven by the national media and online presence. The highest number of portal sessions, by far, was seen on the 17 October (35,461). Unlike the initial consultation, the majority of sessions (152,668) on the portal were directed to the site from the social advertising - it had previously been from the BBC News landing page. Interviews with our spokespeople featured on a number of the BBC's national programmes including Radio 4 Today Programme, Daily Politics and BBC News at One and ITV Evening News. Attaining coverage with both channels should be invested in – the importance of regionals should not be overlooked.

During the intense media coverage, there was more interest in comments from political activists, local MPs etc. But despite this, both national and regional media consistently separated political observations from the Commission's work, showing that our hard briefing from the outset that we were impartial, independent and would not comment on political outcomes was successful. Spokespeople were rarely asked about political outcomes and in many cases reporters acknowledged that the politics was out of our hands.

There is also a Private Member's Bill currently going through Parliament, which would affect the conduct and timing of the boundary review.. The first debate took place a couple of days before the end of the consultation which brought the focus of the national media back on the review.

3. Social media

3.1. What we did

3.1.1. Organic

Following the success of the Commission's Facebook and Twitter presence during the last two consultations, we began by developing a comprehensive social media plan to ensure we produced and shared content on Facebook and Twitter on a more regular basis throughout the consultation period. This was focused on key activity each week so we could increase awareness of upcoming events to drive engagement with the consultation. Content was varied and included graphics, a video and links to blogs from members of staff. Variety was key in appealing to a range of audiences and visual content/links will always perform best. This also helped drive visits to our consultation website.

3.1.2. Paid-for

We again engaged a creative agency to amend and refine our brand and adverts for use on social media (writing the copy ourselves) and an advertising agency to deploy these as promoted posts and Tweets (biddable adverts) throughout the consultation period (October - December). This was intended to increase our audience reach – engaging a wider range of individuals. The audiences we targeted via Facebook were all over the age of 16 with specific interests or in various groups such as residents of multicultural communities or retired. The target audience on Twitter was those over 18 who had lived in England for over six years and were residents of mixed communities. This paid-for activity intended to drive as much traffic as possible to our website. Our learning from the initial proposals was that this was the most effective way of driving traffic to our website, and we therefore ran this element of the campaign throughout the whole eight weeks of the consultation.

3.2. Evaluation

3.2.1. Outputs

We continued to increase our organic output on social media with 4 Facebook posts and 76 Tweets between 17 October and 11 December. Content included graphics produced by Kindred, and staff blogs and videos. Posts and Tweets that consistently achieved higher engagement were those with a clear call to action and links. Addition of deadline reminders in late November also promoted engagement.

It is worth noting this Review has spent less than previous reviews and also updated its communications approach, making better use of online channels – saving money and producing results.

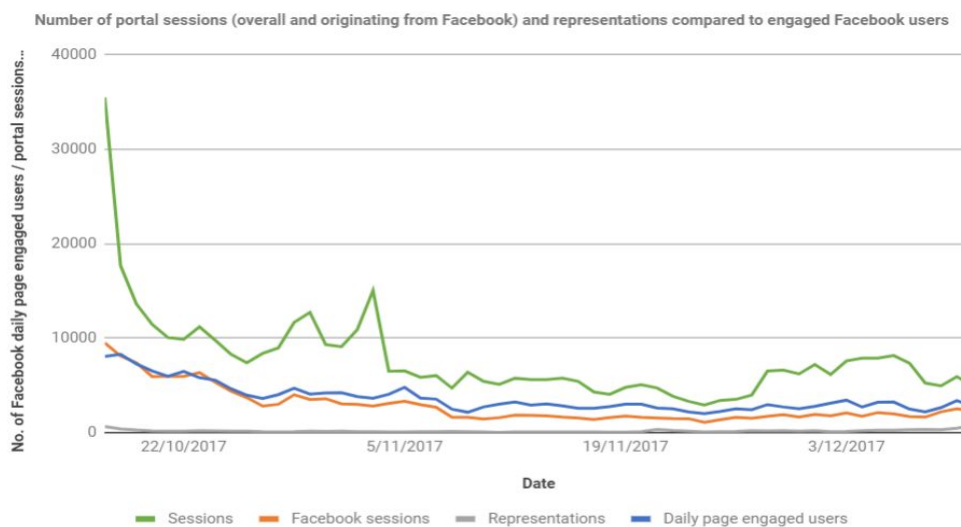
3.2.2. Impact

In addition to a marked increase in Facebook Likes (from 5,037 in October to 6,850 by the end of November) and Twitter Followers (410 by the end of November), engagement, as expected, increased following the publication of our revised proposals and the start of our paid-for content at the same time.

The biddable adverts on Facebook and Twitter performed better than expected for this campaign, although not as strongly as the initial consultation. Facebook adverts were clicked on more often than Twitter, a total of 204,647 times (exceeding the 172,827 more than originally planned). This translated as a click through rate (CTR) of 2.98%, impressive when the average for government campaigns is 1%. Although not as good as Facebook, our graphics still performed well on Twitter, with a CTR 0.88%, still higher than 0.28% planned.

This good performance in biddable boosted aspects of engagement with our social media channels in general with clicks, reach and impressions for all our social media content peaking during the period when adverts appeared on social media. The majority of those who saw our Facebook posts in October and December saw paid-for content rather than organic content; additionally Twitter impressions. Our Tweets earned 5.4M impressions over the 56 day period between 17 October and 11 December, with our top Tweet on the 23 November earning 698,526 impressions with total engagement of 9,229.

Engagement translated into portal sessions, with the majority of sessions coming from Facebook once paid-for content started. Changes in session numbers also correlated with the number of engaged users on Facebook.



3.2.3. Lessons learnt

For a relatively unknown organisation paid-for advertising on social media helped to raise our profile and greatly increase engagement with us on social media. This in turn drove users to our portal.

Our biddable advertising delivered good value for money with the cost per click coming in lower than expected. Carat's overarching recommendation was to replicate the main framework of the campaign due to its success. This means targeting the same audiences, using the same channels and choosing messaging with a strong call to action. However, there is always room to do more depending on budget. The most interesting suggestions included using the Facebook pixel to create customer audiences so we can retarget people that have already been engaged with our activity, this could be beneficial in a process like the Review where there are several stages individuals can get involved at.

For this consultation the weakest performing social media posts were those that were designed to start a twitter conversation (called 'conversation cards') - we tried this aspect as a way of comparing relative performance. We learnt from the low levels of engagement with these cards that the map-based graphic adverts that linked direct to the website were those most likely to drive traffic, and ultimate engagement, to the site.

4. Advertising

4.1. What we did

We ran a combination of adverts in printed press, on radio and online.

Adverts (25cm x 4cols) developed with Kindred were placed in the national media on 17 October (including the Express, Guardian, Mail, Mirror, Sun, Telegraph, Times, Evening Standard, Metro and City AM) to maximise the achievable coverage and awareness on one single day. In addition adverts were placed in specialist media throughout the consultation to reach under-represented audiences, such as disability publications. We secured better prices for the adverts in the specialist media by taking unfilled spots close to copy deadlines and negotiating inclusion of online advertising and editorial pieces.

There were some errors in the placement and timings of the adverts in the first week. These were due entirely to errors by the newspapers and full compensation (including extra adverts being run for free) was received.

Radio adverts ran from 17 – 31 October and the final week of the consultation across regional stations. As our campaign was focussed on England audiences alone, we missed some potential audiences due to not being able to advertise on UK wide stations, which tend to have growing audiences. There were also errors by certain stations in the playout of the adverts, which for a short time were also heard in Northern Ireland. Again, compensation was achieved for these errors.

We worked with Carat to buy advertising space online targeted at key audiences. Biddable advertising began in October and focused on Google Search, Facebook and Twitter (Facebook and Twitter is covered in section 3. Social Media). Digital Display advertising also ran throughout the consultation and consisted of open marketplace (OMP) advertising using audience targeting, contextual targeting and keyword targeting (most adverts were delivered through keyword targeting within OMP and overall); and private marketplace (PMP) advertising on local newspaper sites and local council advertising. We also trialled new 'avid' video advertisements on a small scale, in order to test their effectiveness.

4.2. Evaluation

4.2.1. Outputs

We planned to run adverts in ten papers but due to an error (mentioned above) the Daily Telegraph and Daily Mirror failed to run the advert on the launch day. Adverts appeared in The Times, Financial Times, Daily Mail, The Sun, Guardian, Daily Express, Evening Standard, Metro and City AM. All eight papers ran the adverts in their first half, with 29% running adverts in the first quarter of their publications. 23% of insertions were upgraded from a first half guarantee to appear in the 1st 25%, three insertions appeared 1st in format and Page 3 of the Financial Times was secured. The adverts were seen by almost 2 million people.

Two bursts of radio adverts were aired on 20 channels covering the first two weeks of the campaign and the final week before the deadline, reaching almost 4 million listeners (better than expected). However, opportunity to hear the advert was higher in the North East (56%) and the lowest reach in the Eastern Region on 32%. A combination of networks and smaller regional stations, including BAME stations to ensure strong coverage throughout England.

Under biddable, we spent the least on Google. The search volume peaked on 17 October at the launch of the revised proposal, with some additional smaller peaks in the days leading up to the deadline. In general,

search volume for the topic is incredibly low, showing good awareness by those searching for the boundary review of the BCE's url, and website.

Digital Display adverts succeeded in surpassing the impressions target of around 26 million by 11%, achieving over 29 million impressions.

4.2.2. Impact

Unlike online advertising it is more difficult to assess the impact of either printed. We are able to tell how many people saw or heard adverts but not how they acted following this without relying on individuals to tell us how they heard about the review. On the radio adverts, the overall strong level of reach of over 10 million and frequency despite limitations of advertising within England only boundaries.

The regional issues on playout error from First Radio and Bauer have resulted in overhauls of processes from both their sides to ensure that the issues do not occur again.

Our paid search results drove 13,832 clicks at a strong click through rate of over 14% (well above the government average), of which 12,264 landed on the home page. 66% of these lands then carried out a postcode search - suggesting a fairly good quality of engagement even if volumes were low.

The impact of digital display was better than expected, with almost 32,500 clicks on the adverts (84% higher than expected). This meant value for money was delivered, as the cost per click was almost 50% lower than expected, although it was not as low-cost as biddable. However, the engagement delivered by these adverts was of a high quality, with over 40% of those driven to the website going on to carry out a postcode search - and this doesn't include those who searched by region or navigated to other pages.

4.2.3. Lessons learnt

Carat highlighted ways to improve volume on Google Search ads but the value of this is questionable as our website was appearing first in organic searches, which cost us nothing. It would be worth considering whether to use this channel again in future review.

Carat highlighted that for future campaigns digital radio could be utilised in order to target particular postcode segments that may be affected by boundary changes.

5. Stakeholders

5.1. What we did

As we did prior to the initial and secondary consultations, we worked with Kindred to refine and develop our partner pack for stakeholders. This included a guide to the review, posters, social media infographics, news release templates, blog templates and a factsheet. This was placed on our website and we contacted stakeholders (a mix of local government and third sector stakeholders) ahead of the publication to ask them to help promote the Review either by using the resources in the pack or through social media. In addition we worked with the Local Government Authority (LGA) to raise awareness of the review through their channels and encourage local councils to support our communications by using the pack, including writing a blog that was published in local council publications LGA First and the Municipal Journal.

5.2. Evaluation

5.2.1. Output

Local Government were most supportive with various councils using the resources provided to post on Facebook and Twitter as well as following us on social media and sharing our posts. They would have received the resources directly from us but also via LGA who ran a feature in their magazine and carried several reminders and calls for support in their communications bulletin. LGA felt this was one of the best instances of joint-up working between local and central government.

5.2.2. Impact

The impact of our stakeholder work was two-fold, with the real value perhaps less in the promotion of the review and more in the development of good working relations. Firstly, our messages were endorsed by trusted sources (local councils) in a public domain (social media) potentially increasing our reputation. Secondly, and as highlighted above perhaps more importantly, our relationship with the Local Government Authority developed throughout the campaign, with them providing valuable communications support and providing positive feedback on our approach to working with them.

In addition also, quite a number of local authorities had our key messages and links to our website on their websites and were encouraging locals to have their say.

5.2.3. Lessons learnt

It is hard to measure the effectiveness or take-up of the partner pack. However, engagement with local council stakeholders is relatively resource-low and increases the profile of the Commission, so there is value in continuing with this approach in the future.

6. Conclusion and forward look

Lessons learnt from the last two campaigns resulted in a more coordinated approach to communications throughout this consultation, which has led to steady balanced media coverage and strong social media engagement. This has driven visits to our website and we know anecdotally has raised awareness. We have successfully encouraged the majority of people who took part in the consultation to make representations online and generated discussion around the review on social media.

It is clear that the changed context of the review may have affected the levels of interest and engagement. While the number of representations was high (at over 10,000 it was significantly more than at the same stage at the last review), and the performance of the social media and digital advertising was stronger than industry standards, it had reduced from the initial consultation stage. This may be down to campaign fatigue, or due to more of the public assuming that the review had either been cancelled or would not get implemented.

While we reached a lot of people through online advertising and social media, there will remain a clear need for more traditional forms of communications as not everyone uses the internet. This made the media coverage we secured valuable, especially in terms of encouraging people to find out more. The value for money of the printed and radio adverts is questionable, it is likely the value in these lies in their use at the beginning of the review to raise initial awareness and that they don't need repeating throughout the review. Their potential value should be thoroughly considered before using at future reviews, as an ever digitising world could reduce their impact in the future.

General Data Protection Regulations and information management review

1. The European Union's General Data Protection Regulation will come fully into force from 25 May 2018, updating legal requirements as to the collection and processing of personal data (currently grounded in the Data Protection Act 1998). Although the BCE's work - being constitutional in nature - is outside the area of EU competence, a new Data Protection Bill currently before Parliament will extend these requirements to all areas of public administration not directly covered by the GDPR (other than law enforcement and the intelligence services), in an 'applied GDPR' scheme. A summary of the new requirements, and how BCE meets (or proposes to meet) those (in relation to its two key sets of personal data), is set out at Annex A.
2. This paper considers the implication for BCE's data protection arrangements and, in particular, recommends certain changes in order to secure compliance with the new requirements. It also takes the opportunity to refresh the BCE's broader records retention periods.

BCE as data controller

3. The BCE has for some years been registered (independently of Cabinet Office) as a data controller, a role on which most of the ultimate responsibility for ensuring proper processing of personal data crystallizes. Our understanding from previous legal advice was that there was no legal obligation on BCE to be a controller, but as an independent arm's length body we could take that role. We have done so to date, on the basis that Commissioners have felt it appropriate that that data be legally in the control of ourselves rather than a sponsor Government department, given the purpose of the collection of data, and our independent nature.
4. With the impending introduction of a revised data protection regime, we have sought clarification on whether that previous position still holds. Initial advice is that as BCE does not have its own 'legal personality', it could not be its own data controller. This would leave us as being in the uncomfortable position of not being the legal controller of the data we collect for our statutory purposes, and we are therefore seeking to gain firm confirmation on this fundamental point.
5. Even were BCE able to continue as its own data controller, **we recommend that BCE seek to be a data controller only for personal data processed in relation to its specific statutory responsibilities, i.e: a) data from the full electoral registers, which is sent to us annually; and b) data from the responses to consultations we conduct during a constituency review.** Other data that is collected and processed as part of more generic public administration (e.g. staff data, and data from general public correspondence) should default to the sponsor department as data controller. The reasoning for this is partly the very limited resource (particularly between active reviews) and expertise available in the Secretariat to properly fulfil the duties (particularly in between active reviews). Primarily, however, the reason for leaving control of personal data processed within these 'general public administration' tasks with the sponsor department is that it reflects the reality of the arrangement: in common with many business units within that department's aegis, such data will both be generated and handled in accordance with departmental policies, and held on IT systems provided by

the department.

Control of a separate data processor

6. GDPR gives specific recognition and responsibility to the role of a 'data processor', recognising that this role may be distinct from the data controller. In practical terms, this recognises that the body that actually holds and processes the data may not be the same as the legal data controller, but must therefore act under the authority (and instruction) of the latter. In order to demonstrate that the processor is acting under the enforceable instruction of the controller, the data controller must ensure that appropriate data protection requirements are written into the contract with the supplier of the processing service (or the equivalent legal instrument for non-contractual relationships).
7. Data from consultation responses during the 2018 Review of Parliamentary constituencies is currently held in a database established and maintained by a third party IT provider under contract, so we will ensure (through the Cabinet Office as the named legal personality in the contract) that appropriate data protection provisions are included in that contract to cover appropriate handling by the supplier and the sub-contracted server provider. Electoral register data, representations from previous constituency reviews, and general public administration data are all held on Cabinet Office IT systems provided to us, and we are working with lawyers to ascertain the most appropriate legal instrument in which relevant data protection provisions can be inserted, given the nature of that relationship: this is most likely to be specific provisions included in a Memorandum of Understanding between BCE and the sponsor department.

Data Protection Officer

8. A public authority must appoint a Data Protection Officer (DPO), whose duties involve: informing and advising the organisation of its obligation under GDPR and other data protection legislation; monitoring compliance, managing data protection activities, training staff, conducting internal audits; and being the first point of contact for supervisory authorities and individuals whose personal data is processed. Accordingly, they are required to: report directly to the board of the organisation; act independently and not be penalised for conducting their duties; have professional experience and knowledge of data protection law; and have provided to them sufficient resources to conduct the duties and responsibilities of their role.
9. A single DPO may be appointed for a group of public authorities. In light of the limited staff resource and data protection expertise available within the BCE (particularly outside of an active review), the likelihood of BCE not being its own data controller, and the requirement for the DPO to be able to act independently, **we recommend that the BCE come within the ambit of the DPO appointed for the sponsor department.**

Data retention periods

10. The implementation of GDPR - and particularly the principle relating to retaining personal data only for as long as it is necessary - affords the opportunity to consider afresh what the BCEs retention periods should be for all the information and data that it generates. Annex B sets out the broad categories of data that BCE generates, and makes a recommendation for an appropriate retention period for each one. **Commissioners are invited to give their views on the recommended retention periods specified in**

Annex B. These will then be discussed with the Information Management team in the sponsor department and The National Archives, before final agreement with Commissioners by email.

Refresh of the Data Protection and Privacy notice

11. The implementation of the new GDPR requirements will necessitate some modification to the BCE's Data Protection and Privacy notice, provided to the data subject at the point at which their data is collected. Though most obviously used in relation to consultation responses (see item 1c at Annex A), a notice should be provided at any point the BCE collects personal data (e.g. through general correspondence from individuals, which contains their name and physical or email address). The Secretariat is currently developing an updated notice, a draft of which will be circulated and agreed with Commissioners via email following the current meeting.

Requirements of GDPR and application to main BCE-specific data processing

GDPR establishes seven core principles (realistically six, as the seventh is simply to demonstrate compliance with the first six).

Requirement	How BCE meets the requirement (or will by May 2018)
<p>1a) Personal data must be processed lawfully. Most relevantly for public authorities, this will manifest as either: a legal obligation/public task placed upon the public authority; or individual consent to processing, provided by the data subject.</p>	<p>For collection of electoral register data, statutory authority is provided, as BCE is one of the bodies entitled to a copy of the 'full' version of the electoral register maintained by local electoral registration officers (named in the Representation of the People (England and Wales) Regulations 2001, regulation 101).</p> <p>For consultation responses, statutory authority is provided by the specific requirements to consult, set out in section 5 of the Parliamentary Constituencies Act 1986.</p>
<p>1b) Personal data must be processed fairly. The data subject should not be misled or deceived about the processing, or have their data processed in a way likely to cause distress.</p>	<p>BCE does not collect the electoral register data directly from the data subject, but the Regulations very tightly prescribe how we may process the data, restricting it to activities 'in connection with their statutory duties'.</p> <p>For consultation responses, respondents are notified clearly and explicitly - via a data privacy notice - of the manner in which their personal data will be processed, at the point it is submitted.</p>
<p>1c) Personal data must be processed transparently. The data subject must be properly informed about the processing activity, at the point at which the data is collected. There is an extensive list of specific information about the processing that must be set out.</p>	<p>BCE does not itself collect the electoral register data directly from the data subject. However, we propose to 'de-personalise' this data in any event (see below).</p> <p>For consultation responses, although there are not further consultation stages planned in the 2018 Review, in preparation for use in future reviews, we should refresh the wording of the Data Protection and Privacy notice that is provided to respondents, ensuring that it complies with the new detailed information requirements.</p>

<p>2) Only collect the data for one or more specified, explicit and legitimate purposes, and not further process it in a manner that is incompatible with those purposes.</p>	<p>In the case of electoral register data, this is collected for the purpose of aggregating statistical figures on the number of electors in any given geographic area of England, in support of: a) calculating the distribution of constituencies across the UK; and b) determining where boundaries between constituencies should be drawn, so as to ensure elector numbers remain within the statutory permitted numerical range.</p> <p>In the case of consultation responses, the data is collected to inform considerations of the weight of evidence adduced in support or opposition to proposals on constituency boundaries in a specified statutory boundary review.</p>
<p>3) Personal data must be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.</p>	<p>Electoral register data is collected for the reasons as specified in the previous entry. This process does not actually require the names of individuals, and we therefore remove name data from each electoral register on receipt, thus 'depersonalising' it. We have for some time been pressing for the data to be provided to us already in depersonalised form, though this will require government legislation to be implemented.</p> <p>Consultation responses require full name and address details of the respondent, as these are integral to consideration of the weight of evidence being adduced in a consultation based geographic options.</p>
<p>4) Personal data must be accurate, and where necessary kept up to date, with inaccurate data being erased or rectified without delay.</p>	<p>Electoral register data is intended to be a snapshot in time (particularly in a live review). Separately from an active review, electoral register data held by BCE is updated annually to 'keep under review' constituency sizes, in accordance with its overarching statutory duty.</p> <p>Consultation response data inaccuracies are corrected on receipt of notification. Consultation response data is intended to be accurate 'at a given point in time', so data does not need updating.</p>
<p>5) Personal data must only be kept for as long as it is necessary for the purposes for</p>	<p>See Annex B for proposed refresh of retention times for BCE data (personal and</p>

which it was collected	non-personal).
6) Ensure that the personal data are appropriately protected against loss, destruction, or unauthorised access	<p>Electoral register data is held only in electronic form within the Cabinet Office IT system. As such, it is covered by Cabinet Office and HM Government IT security policies and procedures, to protect against loss, destruction and unauthorised hacking.</p> <p>Consultation responses are held on external databases under contract with a third party provider. Contractual clauses (drawn up by the Crown Commercial Service) to require appropriate data protection against loss, destruction or unauthorised access (such as to meet GDPR requirements) are being inserted into that contract.</p>
7) Be able to demonstrate that BCE is compliant with the six data protection principles above.	The data controller must keep a 'processing record' for each data processing activity, providing an extensive list of information in relation to that activity. BCE will maintain such a processing record (or, if not its own data controller, provide such a record to the appropriate data controller).

There are then six further notable more specific requirements placed on a data controller, as follows:

Requirement	How BCE meets the requirement (or will by May 2018)
8) Comply with the rights of data subjects, e.g. to access the data held about them, or to object to its processing	BCE commits to doing so.
9) Only transfer personal data outside of the European Economic Area if appropriate safeguards are in place	BCE data held outside of the sponsor department's network (which is itself subject to HM Government rules about server hosting outside the EU) is contractually required to be held on servers within the EU.
10) In the event of a personal data breach, notify the Information Commissioner promptly, and no more than 72 hours after becoming aware	BCE commits to doing so.
11) In the event of a data breach, notify data subjects who are affected, where	BCE commits to doing so.

appropriate.	
12) Where required, ensure that a Data Protection Impact Assessment is carried out before high risk processing activities are commenced.	BCE commits to doing so, on advice from its Data Protection Officer as to the circumstances in which it would be appropriate.
13) Ensure that any processing carried out on behalf of the data controller (e.g. by a third party company) is subject to appropriate safeguards.	As noted in the cover paper, the only personal data processed outside of the BCE and sponsor department's system is the consultation responses processed under contract by the third party provider of the consultation website. The contract under which this service is provided incorporates appropriate data protection clauses, specifically drafted by the Crown Commercial Service to address the requirements of GDPR.

Recommended retention periods for BCE data

The table below makes recommendations as to retention periods for generic categories of data held by BCE - individual records within any given category may be identified for longer-term retention by the Secretary to the Commission on a case-by-case basis.

Description of data	Retention period
Consultation responses from the current review (includes personal data)	Hold until the subsequent Statutory Instrument is passed (or, if applicable, the Review is terminated earlier for any reason).
Consultation responses from previous reviews (includes personal data)	Destroy, in line with entry above.
Electoral registers (should have been de-personalised on receipt)	For most, destroy when new annual update for the relevant area is received. Exception is the particular register to be used for a statutory active review, which should be retained until the subsequent Statutory Instrument is passed (or, if applicable, the Review is terminated earlier for any reason), then destroyed.
Aggregated electorate data	Keep indefinitely (it provides a historical record of how constituency electorates have changed from year to year, which we are sometimes asked about).
Formal Commission meeting papers and minutes (final versions: drafts should be deleted once final versions are agreed)	For Reviews that result in implemented constituencies, keep for five years, before archiving and subsequent potential transfer to The National Archives. For Reviews that do not result in implemented constituencies, keep for two years from end of that review, before archiving. For meetings outside of an active Review, keep according to the status of the next following Review.
Informal internal policy development papers relating to a Review (textual and mapping)	Hold until the subsequent Statutory Instrument is passed (or, if applicable, the Review is terminated earlier for any reason), then destroy.
Locally-held personal data about individual Commissioners, Assistant Commissioners, or staff (e.g. individual performance assessment, and public appointment records).	Keep for 12 months after the individual has left the BCE (or been unsuccessful in an application for a position), then destroy.

Legal advice	Retain for as long as the issue in question remains operative, then archive.
Notifications from the Local Government Boundary Commission for England	Destroy after 12 months (information about current reviews is on the LGBCE website, and changes are made by Statutory Instrument, which are on legislation.gov.uk).
General correspondence (i.e. other than consultation responses)	Destroy 12 months after end of calendar year during which it was received. Exceptions to be retained are: correspondence with the Speaker of the House of Commons (and their Office); and formal correspondence with the sponsor department, both of which should be kept for five years, then archived prior to potential transfer to The National Archive.
Financial, procurement and contractual papers	Retain for 12 months after end of financial year to which they relate, then archive until six years from date of creation, then destroy (in case of possible legal action: accords with statute of limitations period for civil actions).
Other documents relating to the logistics and general administration of the BCE (other than financial, procurement and contractual papers)	Retain for five years, then destroy.

Arrangements for closing stages of 2018 Review

1. This paper considers in more detail the procedure for the closing stages of the 2018 Review, expanding on the outline set out in the project plan annexed to Paper 1 of this meeting. Whilst this paper is largely for information (key meeting dates that underpin the process having already been agreed), Commissioners may wish to discuss with the Secretariat any of the procedural aspects of these closing stages of the review.

Development of final recommendations, February – May 2018

2. Having conducted analysis of all the responses to the revised proposals consultation, review staff of the Secretariat will – for each region - work with the designated lead Commissioner for each region to consider what final amendments may be appropriate to the revised proposals, in order to take account of the evidence presented in the consultation responses. A number of days through late February and early March have separately been agreed already with the respective lead Commissioner for an initial briefing meeting and discussion on each region. This will be followed by iteration through March of possible alternatives between the relevant review team and Commissioner remotely via email and telephone, concluding with final sign-off meetings between the teams and the relevant Commissioner on agreed dates in the week of 26 March. It is possible limited site visits may be required during this time.
3. The outcome of this analysis with the lead Commissioner will be written up for each region in the form of formal papers to go to a series of Commission meetings agreed for late April through late May, at which the full Commission will discuss in detail and decide for each region what their formal recommendations will be in their final report.

Drafting and approval of final report, June – July 2018

4. Once the core substantive decisions (i.e. the composition of each constituency to be recommended, and the reasoning) are agreed, the Secretariat will draft the text of the final report to be formally submitted to the Government. During this period the Secretariat will also produce the final maps to accompany the report, using the GIS software.
5. Substantive draft text will be cleared during this period remotely by email with Commissioners. However, at this early stage **we invite Commissioners to discuss and agree (or amend) the structural outline for the final report, attached at Annex A**. Commissioners are invited in particular to comment on the 'lessons learned' section, providing a steer to the Secretariat as to the type and amount of comment they wish to put in the statutory report.

Quality Assurance checking, August 2018

6. Through August, the Secretariat will conduct final quality assurance checking of both the text and mapping files for language and factual accuracy. This period will also see close liaison with the printers to ensure the output files are correct and accurate in both print production and accessible web-enabled versions.

Submission of final report, September 2018

7. The legislation requires the final report of the 2018 Review to be submitted 'before 1 October 2018, but not before 1 September 2018', and the progress of the review to date indicates that we will successfully meet that requirement.
8. The legislation requires the final report to be submitted to 'the Secretary of State or Leader of the House of Commons'. Under normal circumstances, the final report would be provided to the Secretary of State of the BCE's sponsoring department (currently Cabinet Office). However, as of late December 2017 there has been no Cabinet Office minister designated as a Secretary of State. The Secretariat is therefore currently discussing with the Cabinet Office sponsor team who would be the most appropriate Government Minister to formally address the final report to.
9. The Commission will wish to publish its final report and recommendations as soon as possible after submitting them to the Government. We are working with the three other commissions on the most appropriate mechanism for doing this to ensure the fullest transparency of the process, while adhering to any Parliamentary protocols.

Implementation of new constituencies, post September 2018

10. The legislation provides that following receipt of the final reports of all four Parliamentary Boundary Commissions covering the UK, the Government must 'as soon as may be', bring before Parliament a single UK-wide Statutory Instrument (SI), to give effect – without amendment (unless requested by the relevant Commission) - to the recommendations in those reports. The SI is 'draft affirmative' in nature, meaning a draft of it must be actively debated (and approved) by both Houses of Parliament before it can be properly 'made'. If it is so approved and made, the SI itself will specify the date on which it comes into force, but it cannot take effect before the next following General Election to the House of Commons. If the SI is rejected by either House, the Government may - in those circumstances - amend the draft and resubmit.
11. As will be appreciated, this part of the process occurs after the Commission's final report has been handed over, so the timing and passage of the SI will therefore be entirely in the hands of the Government and Parliamentary Business Managers.

2018 Review - Final report skeleton

Volume 1 - Narrative report

Chapter 1 - The administration of the 2018 Review [much taken from Guide]

Legislative framework and source data

- Statutory duty of the Commission
- The electorate and LG boundaries to be used
- Allocation of constituencies to four parts of UK (inc. protected constituencies)
- Electoral quota and permitted electorate range
- Other statutory factors
- Requirement to report to Government

BCE policies

- Further distribution of England constituency allocation between nine regions
- LG boundaries: adjacent whole wards as building blocks, avoiding ward splits and orphan wards; trying to respect county boundaries
- Things we don't look at: political support; post-2015 electorate change (unless otherwise balanced decision); post-2015 wards (unless can make a May 2015 ward-split replicate a post-2015 ward boundary)
- Naming of constituencies
- Designation of constituencies

Progression of 2018 Review (mention aborted 2013 Review and that 2018 was therefore treated as 'the first review' after 2011 legislation in terms of the statutory reference?)

- What
- When
- How
- Stats (where available)

Learning from 2018 Review

Matters that might be included:

- Success of the consultation portal
- Questionable continued value of physical place of deposit in every constituency
- Reduced cost of the 2018 Review compared to 2013 Review
- Difficulty of working at lower than ward level (inconsistency of data availability and quality)
- Very mixed attendance at public hearings (scheduling after first consultation would be better)
- Administrative undesirability of 'three years (full) on, 2 years off' review cycle
- Lack of synchronicity with local government rewording
- Extended period of time that is passing since last implementation of a constituency refresh
- Given our output, why do PBCs report to Govt (who add no value), when LGBCE reports directly to Parliament?

Chapters 2-10 - Regional chapters

Nine individual chapters, one for each region, with common structure for each, as follows.

Pen-picture of the region

- Current and new number of constituencies (including number of current outside of permitted electorate range)
- Principal local government arrangements (counties/districts/unitaries)
- Key physical geography (e.g. mountains, significant hill ranges, big rivers)
- Key social geography (e.g. strong local identities, particularly where distinguished from neighbouring areas)
- Dates and locations of public hearings held in the region

Sub-division of the region

- 'Theoretical entitlement' and the Initial proposals sub-region split
- Responses to the split and any consequent changes at revised proposals
- Responses to any revised split and what the final split is

Final sub-region (each)

- Initial proposals (summary)
- Responses to the initial proposals, including secondary consultation respondents comments on others' views (summary, without portal reference numbers)
- Revised proposals (summary)
- Responses to the revised proposals (in more detail, but still without portal reference numbers)
- Final decisions of Commissioners on all constituencies, with reasoning

Volume 2 - Recommended constituencies data and maps

- Region-by-region listing of individual recommended constituencies, covering names, designations, component wards, and ward and constituency electorates.
- For each recommended constituency have the illustrative map on the page opposite.