



## **BCE/2021/6th meeting**

### **BOUNDARY COMMISSION FOR ENGLAND**

#### **Notice of meeting**

The presence of Commissioners is requested at a meeting to be held at 11am on 22 November 2021. The meeting will be held at the St Matthew's Conference Centre

#### **AGENDA**

1. Welcome and minutes of the last meeting (PL)
2. 2023 Review Programme update (est 15 minutes) - **Paper 1** (TBo)
  - a. Timetable
  - b. Risk register
  - c. Highlight report
3. Secondary consultation - preparations (est 10 minutes) **Paper 2** (TBe)
4. Public hearings update (est 15 minutes) **Paper 3** (WT)
5. Equalities update (est 15 minutes) **Paper 4** (WT)
6. Communications evaluation (est 30 minutes) **Paper 5** (EI)
7. Any other business

**Close (2pm)**

**Tim Bowden**  
**Secretary to the Commission**

## **Minutes of the fifth meeting of 2021 of the Boundary Commission for England, held on 14 September 2021**

Mr Justice Lane (Deputy Chair)  
Colin Byrne (Commissioner)  
Sarah Hamilton (Commissioner)  
Tim Bowden (Secretary to the Commission)  
Deputy Secretary to the Commission  
Head of Corporate Services  
Business Manager  
Business Support Officer

### **1. Welcome and minutes of the last meeting**

- 1.1 Commissioners suggested grammatical changes to the draft minutes of the Commission meeting on the 21st May 2021. Subject to these changes, the minutes were agreed by the Commission.

### **2. Paper 1: 2023 Review initial proposals consultation update**

- 2.1 The Deputy Secretary noted the success of the consultation portal used during the initial consultation, as well as the positive and constructive feedback received from users.
- 2.2 The Deputy Secretary presented the Commissioners with an overview of consultation responses in each of the nine regions in England. He outlined the nature of the feedback received in each of the regions and main issues.

### **3. Paper 2: 2023 Review - Public hearings**

- 3.1 The Head of Corporate Services presented the Secretariat's recommendations for the holding of both physical public hearings and the hybrid approach to public hearings.
- 3.2 Mr Bowden noted that the public hearings are now being held in the secondary consultation period, the locations of public hearings can now be informed by the representations received during the initial consultation period.
- 3.3 Commissioners agreed the number of public hearings should be determined by the main issues that have arisen during the consultation on the initial proposals, while also being mindful of identifying suitable venues for hearings, and ensuring good transport links. Based on this information the Commission agreed to hold 30 public hearings during the secondary consultation.

- 3.4 Commissioners agreed on the locations of these 30 public hearings. Commissioners agreed that the lead public hearing for the North East Region should be held in Newcastle.
  - 3.5 Commissioners agreed to the recommendations set out in the paper in relation to physical public hearings.
  - 3.6 Commissioners agreed that all hearings should be live streamed on a streaming platform, and a record of the hearing provided.
  - 3.7 The Head of Corporate Services presented the two options for the hybridisation of public hearings. Option one - the hybridisation of all hearings and option two - the hybridisation of one hearing per region. The Commissioners agreed on option two that one hybrid hearing should be run per region, resulting in nine hybrid hearings overall.
  - 3.8 The Commissioners agreed that the hybrid hearings should be held as the second hearing in each region. Mr Byrne questioned the possibility of holding one lead hearing as a hybrid hearing and asked the Secretariat to explore this further. The Secretariat will seek legal advice on delivering hybrid public hearings.
  - 3.9 The Secretariat will work to produce guidance for users and Assistant Commissioners on public hearings. The Secretariat will update Commissioners on this at the next Commission meeting.
- 4. Any other Business**
- 4.1 Commissioners agreed the next meeting should be held on 22nd November 2021.

## **BCE/2021/6th meeting/Paper 1**

### **2023 Review programme update**

**Programme documentation will be provided to Commissioners for all scheduled Commission meetings, and will also be sent to them at regular intervals in between.**

### **Update since the last meeting**

1. Commissioners last met in September 2021, since then progress has been made on a number of operational areas.

#### *Staffing and recruitment*

2. On 29 October the Commission held an induction day for the Assistant Commissioners appointed for the 2023 Review. On that day, 16 of the Assistant Commissioners were able to attend, with the remaining two Assistant Commissioners attending an abbreviated session on 17 November 2021. Feedback received is that it was a successful event.
3. In early December 2021, the Secretariat will officially move to the Department for Levelling Up, Housing and Communities (DLUHC) as part of the Machinery of Government (MOG) changes. The Secretariat may experience some minor changes in terms and conditions to align with those in the new Department. Any changes are of course being agreed between the Department, the trade unions and staff. The Secretariat has direct input into the changes as part of the MOG in relation to the work of the Boundary Commission. We have been particularly clear on the need for continuity for both accommodation and IT systems.

#### *Finance*

4. The budget for 2021-22 remains tight and has been forecast to ensure we have sufficient budget to cover significant expenditure in the final quarter of the financial year i.e. public hearings. In light of the user survey conducted on the consultation portal during the first consultation, we had identified a number of enhancements to make to the website. However, at present, we

do not have the spare capacity in this financial year to fund those. We will reconsider making those enhancements in the 2022-23 financial year.

#### *Accommodation*

5. At present the team are enjoying working at 35 Great Smith Street. The Cabinet Office (and DLUHC) approach to hybrid working is to encourage staff to be in the office 40-60% of the time. At present the majority of staff are attending the office at least one day a week. We certainly consider the team are benefiting from being able to collaborate in person. We will continue to monitor the guidance on the pandemic and will of course communicate with staff should the current approach change.

#### *Electorate data and review work*

6. The Commission received over 34,000 representations in response to the initial proposals. We had originally hoped to have reviewed all responses before the end of November, but given the significant number of responses received this will now be before the end of December. The Review Team is on target to meet this deadline. In the new year members of the senior leadership team will be reviewing the representations to ensure a consistent approach has been applied to tagging of data, and necessary personal information has been redacted. At this meeting you will be considering a paper on whether to publish the representations ahead of the secondary consultation.
7. In December 2021, the Secretariat will carry out its normal practice of working with the Office for National Statistics (ONS) and local authorities to collate electorate data as part of the annual canvass. This is a business as usual activity - to monitor annual changes of electorate in existing constituencies - and is a separate piece of work to the 2023 Boundary Review.
8. In January 2022, the Commission will be required under the Parliamentary Constituencies Act 1986 (as amended) to provide the Speaker of the House of Commons with a progress update on the 2023 Boundary Review. A draft of this update will be circulated to Commissioners for comment in due course.

### *Public hearings*

9. At your meeting in September, you agreed to convene 30 public hearings during the secondary consultation. The overall number and locations of the hearings was based on where significant issues had arisen during the consultation on the initial proposals. At the same time you agreed your preference to convene nine hybrid hearings and seek legal advice on this specific matter.
10. The legal advice you have received and considered states that convening a virtual element to a public hearing (even in a hybrid proposal) would be ultra vires. In light of the legal advice, the Secretariat has prepared a paper for you to consider on public hearings at this meeting.

### *Communications*

11. The easy read Guide to the Review was published w/c 8 November 2021. At this meeting you will consider a paper and presentation on the communications evaluation for the consultation on the initial proposals.

### **Timetable**

12. The timetable for the 2023 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.
13. As Commissioners will be aware, we hoped for the Assistant Commissioners to be appointed in July 2021, whereas appointments were made in September. Apart from delaying the induction process, this has had very little impact on the delivery of the Review. As noted above, we now plan to have reviewed all representations received on the initial proposals before the end of December 2021.

### **Risk register**

14. 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.
15. A risk register for the 2023 Review is at **Annex B**. The risk register is also maintained as a 'living document', with new risks added as they may arise, ongoing risks modified as they decrease/increase, and fully mitigated. The risk register has been reviewed to take account of potential impacts arising from the MOG.
16. We have also included a specific risk in relation to the delivery of the public hearings. This risk has a particular focus on the potential impact of the COVID pandemic.

### **Highlight report**

17. 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**

18. In addition to issuing all three documents for Commission meetings, as agreed, 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.



**Programme management - Timetable**

	2021												2022												2023								
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
<b>Comms</b>		X																															
Consultation portal procurement launch		X																															
Consultation portal contract award		X	X																														
Consultation portal build			X	X	X																												
Final handover and 'Go live' of consultation portal						X																											
Accommodation move to full-size premises																																	
Investigate and book public hearing venues								X	X	X	X																						
Procure transcription service for public hearings										X	X	X																					
Run public hearings															X	X																	
<b>Finance</b>																																	
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	X																																
Prepare 'Guide to 2023 Review'	X	X	X																														
Publish 'Guide to 2023 Review'					X																												
Consult on initial proposals (statutory 8 week consultation) 8 June to 2 August						X	X																										
Secondary consultation (statutory 6 week consultation)															X	X																	
Consult on revised proposals (statutory 4 week consultation)																					X	X											
Statutory annual progress update													X												X								
Publish Annual Report						X															X									X			
<b>Commission meetings</b>																																	
2023 Review policy session																																	
Meeting with political parties																																	
Commission meeting – 7 December 2020																																	
Commission meeting – 8 February 2021		X																															
Commission meeting – agree initial proposals – 22 and 23 March 2021			X																														
Sign off initial proposal reports				X																													
Commission meeting – 21 May 2021					X																												
Commission meeting – 14 September 2021								X																									
Commission meeting - 22 November 2022											X												X										
Commissioning meeting - agree revised proposals																			X														
Sign off revised proposal reports																			X	X													
Commission meeting																							X										
Commission meeting - agree final recommendations																									X								
Sign off final recommendation report																											X	X					

Strategic Risk Register: 2023 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	SLT 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	TBo	Significant	Possible	12	Treat	Commission formulated provisional policies. Commission met with political parties. Guide to the 2023 Review published. Legal advice sought on particular policies. Review of Equality Impact Assessment		Significant	Remote	8	↔	8	1. Review of all internal policies and procedures; 2. Equality Impact Assessment to be finalised; 3. Legal advice sought when appropriate; 4. Commission meetings and associated communications with qualifying political parties; 5. Regular quality assurance of internal procedures
2	Legislative change	Changes are made to the primary legislation governing the structure of the Commission and/or the procedures for a review.	TBo	Severe	Possible	16	Tolerate	Parliamentary Constituencies Bill completed its passage in Parliament; Local Authorities providing required electorate data based on the Bill. Secretariat written to the sponsor on the issue of hybrid public hearings		Moderate	Possible	9		9	1. 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. Although communications with the sponsor team will continue.
3	Human resource	Insufficient numbers and expertise levels of Commissioners, Assistant Commissioners and staff inhibit the delivery of the review	WT	Severe	Possible	16	Treat	SLT recruited; majority of Secretariat in post; Assistant Commissioners recruited		Moderate	Possible	9		8	1. Continuing to monitor impact of Covid on ways of working, including impact to planned review timetable and delivery of the Review 2. Potential impact of the MOG

Strategic Risk Register: 2023 Review of Parliamentary Constituencies															
4	Public Hearings	1. The impact of Covid-19 on the delivery of Public Hearings e.g. the tightening of restrictions, limited capacity at selected venues;	WT	Significant	Possible	12	Treat	1. Legal advice clear that public hearings must be physical unless changes to the legislation are made. 2. Secretary written to the Sponsor team on the issue of not being able to convene hybrid public hearings, and assurance that emergency legislation would be brought forward in the event of the COVID pandemic worsening.		Moderate	Possible	9	↔	9	1. Continuing to monitor the Government approach to the COVID pandemic and understanding how this could impact the delivery of the public hearings. 2. Engage with Sponsor team if necessary on requirement for emergency legislation. 3. Engage with other Boundary Commissions on approach to public hearings
5	Financial, physical and data resource	Inadequate budget, physical accommodation or information management leads to inability to deliver review to quality and timescale required	WT	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; 6. Accommodation space has suitable Covid-19 arrangements.		Moderate	Possible	9	↔	5	1. Reflect Covid working arrangements depending on wider (inc. national) restrictions.
6	Technology	Hardware and/or software (particularly GIS and consultation website) unfit for purpose, leading to significant delay to the timetable and/or reputational damage	TBe	Severe	Possible	16	Treat	1. GIS delivered 2. Consultation portal delivered 3. Upgrade to corporate website delivered 4. Ongoing supply and maintenance contracts in place with suppliers.		Significant	Possible	12	↔	12	1. Award contract for Public hearings AV technology 2. Investigate whether new contracts on printing and advertising will need to be entered given these are provided by the Sponsor department

Strategic Risk Register: 2023 Review of Parliamentary Constituencies															
7	Reputation	Inappropriate conduct and/or errors in published material leads to lack of public confidence in BCE competence and/or independence	TBo	Significant	Possible	12	Treat	1. Clear communication of expectations and policies on public service propriety; 2. Clear communications strategy 3. Quality assurance process 4. Robust verification of electorate data		Significant	Negligible	4		4	1. Monitor clarifications on data/reports 2. Lessons learned from quality assurance process

# Programme management - BCE 2023 Review Highlight Report

## November 2021

<b>Achieved / delivered</b> (Good news/highlights)	<b>Risks / issues</b> (Including mitigation)	<b>Forward look</b> (Activity over the period, update on whether on track in the immediate/long term and status of significant milestones)
<b>Electorate data and technology</b>		
<ul style="list-style-type: none"> <li>• Polling district mapping data layer from OS loaded into GIS.</li> <li>• Determined, at present, no funding available for portal enhancements prior to next financial year.</li> </ul>	<ul style="list-style-type: none"> <li>• Accuracy of electorate data received for prospective ward boundaries - dependent on providing electoral registration officer</li> <li>• Transfer of bespoke IT from CO to DLUHC could cause delays and inhibit the ability of the Review team to work, if there are transfer issues.</li> </ul>	<ul style="list-style-type: none"> <li>• Work with CO and DLUHC in relation to arrangements for BCE's bespoke IT as part of Machinery of Government transfer of BCE between departments.</li> </ul>
<b>Communications and Stakeholder Management</b>		
<ul style="list-style-type: none"> <li>• Met with Omnigov to finalise certain data for evaluation of first consultation campaign.</li> <li>• Created an easy read version of the Guide to the Review</li> <li>• Delivered handbook containing information on their roles and the review for Assistant Commissioners on their induction day.</li> </ul>	<ul style="list-style-type: none"> <li>• Continue to monitor coverage and horizon scan online for any issues.</li> </ul>	<ul style="list-style-type: none"> <li>• Looking ahead to planning the campaign for the secondary consultation period, consider the recommendations presented by Omnigov in their evaluation of the campaign.</li> <li>• Use feedback from stakeholder survey to improve partner pack for future use.</li> <li>• Publish easy read guide on website and promote online.</li> </ul>
<b>Human and Corporate Resource</b>		
<ul style="list-style-type: none"> <li>• The Secretariat's office space now allows for maximum capacity, however, the hybrid working policy remains unchanged, allowing individuals to work from the office / home at their own discretion.</li> <li>• The Secretariat have been informed that we will remain at 35 Great Smith Street following the Machinery of Government from Cabinet Office to the Department for Levelling Up, Housing and Communities.</li> <li>• The 18 Assistant Commissioners have completed the Cabinet Office onboarding process.</li> <li>• The Secretariat held an Induction Day on the 29th October for the Assistant Commissioners,</li> </ul>	<ul style="list-style-type: none"> <li>• Ensuring the safety and wellbeing of staff returning to the office.</li> <li>• The Machinery of Government change may potentially hinder the Secretariat's workflow due to changes to the corporate processes, including IT systems, HR and finance.</li> </ul>	<ul style="list-style-type: none"> <li>• Continue to monitor the situation and follow CO's guidelines on the safe return to work.</li> <li>• The Machinery of Government change recently announced means that BCE sponsorship will move from the Cabinet Office to the Department Levelling Up Housing and Communities (DLUHC), the Secretariat will work with the current and new department as part of the MOG.</li> </ul>

## Programme management - BCE 2023 Review Highlight Report

introducing them to their regions, public hearings and a corporate session on policies and procedures.

- The Corporate Team continues to scope out potential public hearing venues. The key focus continues to be ensuring that the venues are centrally located and are accessible by all.
- Lawyers have informed the Secretariat that there is a high risk of conducting hybrid public hearings. Therefore, the Commission has taken the decision to not carry out virtual hearings for this review. Instead, two additional physical hearings will be held, taking it from 30 to 32 hearings.

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### Reviews

- Preparation and delivery of narrative and mapping for regional briefing sessions during Assistant Commissioner induction day.
  - Quality Assurance, redaction and consistency checking of representations logged into the Portal database.
  - Mapping into GIS of counter-proposals received to determine validity of these and inform future work towards revised proposals.
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## **BCE/2021/6th meeting/Paper 2**

### **Secondary consultation preparations**

#### **Issue**

1. Whether to publish the representations received in the first consultation period before commencing the statutory consultation on those representations.

#### **Recommendation**

2. That we aim to publish the representations from the initial consultation in the week commencing 7 February 2022, but only open the six-week statutory consultation on those in the week commencing 21 February.

#### **Background and considerations**

3. All written representations received during the consultation on the Commission's initial proposals have now been logged into the database, totalling 34,424. Review Team staff have been preparing these for publication (e.g. metadata-tagging and applying redaction where appropriate), and as of early November the team have completed that work on 72%.
4. The Commission's provisional planning timetable has commencement of the statutory six-week secondary consultation on these representations in mid-late February 2022, so as to conclude by the beginning of April 2022 (respecting the request of the political parties to not have consultation running during the main campaigning period for local elections that will be taking place in a number of areas through April).
5. The amendment to the timing of public hearings brought about by the Parliamentary Constituencies Act 2020, which now sees the public hearings conducted in the secondary consultation period, allows interested parties the opportunity to see and take into account others' responses to the Commission's initial proposals consultation before making their oral submissions to a public hearing.

6. Unfortunately, with public hearings spread throughout the six-week period of the statutory secondary consultation, this opportunity is severely curtailed in relation to hearings that take place early in the consultation period. As logistical constraints prevent us from pushing all the public hearings into the latter stages of the six-week consultation period, we have therefore considered decoupling the publication of the representations received in the initial consultation from the start date of the statutory period of consultation on them. Bringing forward the date of publication would permit interested parties reasonable time to absorb and take into account others' views and evidence, then factor that into their own oral submissions, even for the earliest public hearings in the subsequent secondary consultation period.
7. Legal advice: The Secretariat has secured legal advice, to the effect that although previous constituency reviews have by default initiated a statutory consultation period by the act of publishing the material to be consulted upon, there is nothing in the relevant legislation that requires publication of the material and start of the consultation to happen at the same time. That said, as with any other view submitted outside of statutory consultation, it would be legally questionable for the Commission to take into account any view submitted to it in response to the published material but before the consultation period on that material commenced.
8. Consultation portal functionality: Representations are published electronically on the Commission's web-based consultation portal, which is also the medium through which most consultation responses are submitted. Discussions with the third party contracted supplier of the service have indicated that it will be functionally possible to publish the initial consultation responses there, without switching on the facility to allow consultation responses to be submitted until a later date.
9. Respondent expectations and other consultation channels: The general expectation of the public would be that they are able to submit their views as soon as material is published on which views are to be sought. Although we are able to stop such views being submitted via the online portal until the opening of the consultation period, we are not aware of any means to apply an equivalent temporary block on the alternative response channels of email or physical mail.

10. Conclusion: There is definite benefit to be gained from pre-consultation publication of the responses to the initial proposals. Interested parties will have reasonable time to take that material into account in preparing their oral submissions for the earlier public hearings, which in turn should improve the quality and comprehensiveness of those submissions as part of the evidence base that the Commission will subsequently need to consider in developing revised proposals. As there do not appear to be any legal or technical impediments to doing so, we recommend that the publication of the materials for the secondary consultation should pre-date the start of the statutory consultation period on those materials.
11. In terms of how far in advance of the consultation start the materials should be published, we need to balance giving additional time to prospective consultation respondents with the need to have sufficient time to complete the preparation of those materials for publication (and associated technical testing on the consultation portal). We believe two weeks before the consultation should strike the right balance here.
12. As noted above, if publication pre-dates consultation, there are very likely to be some responses to the publication sent in before the consultation starts. We therefore recommend the publication be accompanied by very clear communications that responses should not be submitted - and will not be accepted - before the consultation start date. Any responses that are submitted in the period should be returned to the sender with a notification that it cannot be accepted in advance of the consultation start date and in order to be considered will need to be re-submitted after that date.

**Tony Bellringer**  
**Deputy Secretary to the Commission**

## **BCE/2021/6th meeting/Paper 3**

### **Public hearings update**

#### **Issue**

1. Whether to alter your previously agreed approach to the public hearings for the 2023 Review.

#### **Recommendation**

2. That you should alter your approach to public hearings for the 2023 Review, specifically:
  - a. Based on legal advice from counsel not to convene hybrid public hearings
  - b. Increase the number of physical public hearings from 30 to 32
  - c. Consider further whether the hearings should be live streamed or to just publish an edited version of the hearing.

#### **Background and considerations**

3. As you are aware, you agreed to convene 30 public hearings for the 2023 Review, of which nine would be hybrid hearings which would have provided attendees with the ability to make representations either in person or virtually. The intention of convening hybrid hearings was to hopefully increase the number and diversity of attendees. Having considered the proposal on public hearings at the September 2021 meeting, you agreed that legal advice from counsel should be sought on the matter.
4. Legal advice: Counsel provided detailed advice on this matter, which you've had the opportunity to consider and discuss with counsel. In summary, the advice from counsel was that convening a hybrid hearing in any form is likely to be considered ultra vires and present a significant legal risk.
5. The legal advice from counsel has been shared with the other UK Boundary Commissions and the Secretary has written to the Cabinet Office to understand if the Department would consider amending the

Parliamentary Constituency Act 1986 (as amended) in order to provide for hybrid public hearings. While a response to that letter has not been received to date, it is anticipated that the Department is unlikely to be able to amend the legislation in the timeframe required to deliver public hearings in early 2022.

6. Number of hearings: Again at your September meeting you agreed to convene 30 public hearings in early 2022. The number and locations of these hearings were based on the major issues that had been aired during the first consultation. At previous reviews the Commission had held 36 public hearings, the locations of which had been determined without knowledge of the issues during the consultation. At your September meeting you decided to only convene two public hearings in the West Midlands and the Yorkshire and the Humber regions, which was a reduction of two hearings in each region (previously four hearings had been convened in each region). It was determined that reducing the number of hearings was justified given the ability to better pinpoint the location of hearings and as respondents would be able to participate in a hybrid hearing.
7. However, given the legal advice received the Secretariat recommends the Commission reconsider the number of hearings it wishes to convene in the West Midlands and the Yorkshire and the Humber regions. In the Secretariats view, without the ability for participants to attend virtually, two hearings in each region would be geographically sparse. We therefore propose three hearings are convened in each region. In the West Midlands we recommend hearings are held in Birmingham, Stafford, and either Worcester, Warwick or Royal Leamington Spa. In Yorkshire and the Humber, we recommend hearings are held in Leeds, Hull and Northallerton.
8. Live streaming: A prerequisite of holding hybrid public hearings would have been to live stream the proceedings. Given that hybrid hearings are no longer recommended to be convened the Commission may wish to reconsider whether it is necessary to live stream all hearings. The benefits of live streaming are that participants are able to follow all the proceedings and if they wished could decide to attend the hearing in person to make a representation. It is noted that live streaming requires a strong and stable internet connection (to some extent this will be reliant on the public hearing venue) and at poorly attended hearings it could be

disappointing viewing for the public. At the 2018 Review, the Commission filmed each public hearing and at the beginning of the consultation on the revised proposals it published a consolidated recording of the hearing. The Secretariat considers an option to not livestreaming the hearing would be to publish the consolidated version of the hearing within 24 hours of the hearing having ended. If you were minded to take this approach the Secretariat will need to determine with the Audio Visual supplier how quickly the consolidated video can be produced and cost for doing so. The benefits of this approach is that viewers are able to watch the full proceedings of the day and not have to wait for the hearing to reconvene once adjourned, nor would it be reliant on the internet connection at the public hearing venue. It would also be more inclusive to publish the video during the secondary consultation while the public hearings are taking place. A potential issue with this approach is that the video would be published after the hearing had concluded meaning participants would not have the opportunity to attend the hearing based on the evidence submitted. Subject to further investigations with the AV supplier, the Secretariat recommends the option of publishing a consolidated video of the hearing.

9. Conclusion: Based on the legal advice from counsel, the Secretariat makes a clear recommendation that hybrid hearings should not be convened for the 2023 Review. Proceeding with this approach presents significant risk to the delivery of the Review. Given this change in approach to public hearings, the Secretariat are of the view that three hearings (rather than two) should be convened in the West Midlands and the Yorkshire and Humber regions. This will result in convening 32 hearings in total during the secondary consultation.
10. The Secretariat recommends that publishing a condensed version of each hearing as soon as possible after it takes place would provide transparency for each hearing and potentially increase participation in the review, particularly during the secondary consultation itself.

**Wotey Tannoh**  
**Head of Corporate Services**



## **BCE/2021/6th meeting/Paper 4**

### **Equality impact assessment**

#### **Issue**

1. Whether you have any comments on the Equality Impact Assessment (EIA) attached at annex A.

#### **Background and considerations**

2. As it did during the 2018 Review, the Secretariat has considered the implications of the Public Sector Equality Duty (PSED) on the Commission's work and makes recommendations to the Commission on how to ensure it is complying with it.
3. At your May 2021 meeting, you considered a draft of the EIA which was based on a refreshed version of that agreed for the 2018 Review. You made some comments on the draft EIA and considered it would be valuable to have it reviewed by Counsel. That review has taken place and we have previously shared with you the advice and comments on the EIA.
4. Based on that feedback the Secretariat has sought to update the EIA to reflect the comments received. The updated EIA is attached at annex A, on which the Secretariat welcomes your feedback.

**Wotey Tannoh**  
**Head of Corporate Services**



# **Boundary Commission for England**

**2023 Boundary Review**

**Boundary Commission for England**

**Equality Impact Assessment**

## Overview

The Public Sector Equality Duty (PSED) that is set out in the Equality Act 2010 requires public authorities, in the exercise of their functions, to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- advance equality of opportunity between people who share a protected characteristic and those who do not.
- foster good relations between people who share a protected characteristic and those who do not.

The PSED does not specify how public authorities should analyse the effect of their existing and new policies and practices on equality, but doing so is an important part of complying with the general equality duty. It is up to each organisation to choose the most effective approach for them.

This analysis was carried out by the Commission's Secretariat, and signed off by the Secretary to the Boundary Commission for England.

Should you have any queries or suggestions on this equality analysis, please contact the Commission's Secretariat on [information@boundarycommissionengland.gov.uk](mailto:information@boundarycommissionengland.gov.uk) or 020 7276 1102.

## **Introduction**

1. The Boundary Commission for England (BCE) has carried out an Equality Impact Assessment (EIA) on the Boundary Commission for England's commitment to hold public consultations as part of the 2023 Review, to meet the requirements of the equality legislation and inform the delivery of the Review. At this early stage there are still some detailed aspects that need to be considered throughout the life of the Review to the publication of the final recommendations in 2023.
2. This EIA provides an assessment of impacts and highlights where appropriate a number of steps that have been taken or planned to date.
3. The process will help to ensure that:
  - the Commission's policies and services are free from discrimination;
  - due regard is given to equality in taking decisions on its initial, revised and final proposal;
  - its public engagement, consultation and communications are accessible to all.

## **Aims, objectives and projected outcomes**

4. The Boundary Commission for England (BCE) is an independent and impartial non-departmental public body, which is responsible for reviewing Parliamentary constituency boundaries in England. The members of the BCE and other key positions are detailed on the website.
5. The BCE has the task of periodically reviewing all the Parliamentary Constituencies in England. It is currently conducting a review on the basis of rules most recently updated by Parliament in December 2020. These latest rules result in an increase in the number of constituencies in England and require constituencies to comply with new parameters, so far as the number of electors in each constituency is concerned.
6. The review process is heavily informed by public consultation. The BCE develops and publishes initial proposals for constituencies across England. Representations from the public about these proposals are then taken in writing. After the consultation on the initial proposals, the Commission will publish all representations received and conduct a

secondary consultation, during which representations can be made in writing or in person at public hearings. After considering all the views expressed about the initial proposals, the BCE may revise them and then conduct a further consultation on the revised proposals

7. The BCE is required to make a formal report to the Speaker of the House of Commons by 1 July 2023, recommending any changes that it believes are appropriate to the distribution, size, shape, name or designation of constituencies in England.
8. After the final report from all four Parliamentary Boundary Commissions has been laid by the Speaker, within four months of the last report being laid the Government is required to submit to the Privy Council an Order that gives effect to all four Commissions' recommendations. In drawing up that Order, the Government may not modify any of the recommendations of the Commissions, unless specifically requested to do so by the relevant Commission (and any such request must itself be laid before Parliament and published). After the Privy Council approves the Order, the new constituencies take effect at the next General Election

### **BCE's approach to the EIA process**

9. As highlighted in the section above, the aim of the Boundary Commission is to review all the Parliamentary constituencies in England and make recommendations to Parliament. Equality, diversity and inclusion are especially important to BCE, because we want members of the public to participate and help to inform the process.
10. We need a broad cross-section of the community to make sure that people really do get a chance to make their views count and we encourage all to participate in our consultations.
11. The impact on BCE staff is not covered by this assessment as this falls under the wider Cabinet Office's equality, diversity and inclusion strategy.

### **The PSED**

12. The PSED under the Equality Act 2010 requires public authorities to have due regard to eliminate unlawful discrimination, advance equality of opportunity and foster good relations.
13. The duty covers nine areas: age; disability; gender reassignment; pregnancy and maternity; race (this includes ethnic or national origins, colour or nationality); religion or belief (this includes lack of belief); sex and sexual orientation and marriage or civil partnership. These are known as protected characteristics. This EIA looks at the impact on:
- **The boundary reviews – the policy:** The decisions taken relating to the initial, revised (where appropriate) and final proposals; and
  - **Public engagement:** The manner in which the Commission engages, communicates and consults with its stakeholders and the general public.

### **Boundary reviews**

14. The decisions taken relating to the initial, revised (where appropriate) and final proposals are mainly bound by the Parliamentary Constituencies Act 1986 (the Act). The BCE is tasked to undertake parliamentary boundary reviews but, in formulating its policy, the Commission is bound by the statutory requirements that it must adhere to. These are:
- The base data used for a review are those that were on the electoral register published on the review date. For the 2023 Review, this means that the electorate figures used must be those from the electoral register that were published on the 2 March 2020;
  - The Commission may have regards to local government boundaries. For the 2023 Review, this means that the local government boundaries referred to are those in force or prospective as at 1 December 2020;
  - The distribution of constituencies – the number of constituencies allocated to England for the 2023 Review is 543. Two of these constituencies are expressly reserved for the Isle of Wight.
  - The statutory electoral range. which requires, constituencies to have an electorate that is no smaller than 69,724 and no larger than 77,062 (except for five specified constituencies).

15. Other statutory factors (as detailed the Guide to the 2023 Review), that the BCE may take into account in establishing a new map of constituencies for the 2023 Review, are:
- special geographical considerations, including in particular the size, shape and accessibility of a constituency;
  - local government boundaries as they existed or were prospective on 1 December 2020;
  - boundaries of existing constituencies;
  - any local ties that would be broken by changes in constituencies; and
  - the inconveniences attendant on such changes.
16. In considering the policy or procedures for the review, the BCE consulted the Parliamentary political parties. However, when formulating its initial proposals for constituency areas, the BCE exercises its own judgement and does not consult the political parties, local government authorities or any other interested groups or people. The proposals are formed from a position of independence and impartiality and are not influenced by any particular viewpoint or opinion.
17. The revised proposals and final recommendations will be formed having considered the representations (written in both consultations and oral contributions at public hearings during the secondary consultation) and evidence received. In determining whether to change its proposed pattern of constituencies, it will consider the evidence in accordance with the statutory criteria set out above and the policies set out in the Guide to the 2023 Review.
18. It may be that during the public consultations some respondents may consider the proposals may have a direct impact on the protected characteristics named on the PSED. It would be appropriate to consider any representations that advance this argument when considering if a constituency breaks local ties.

## **Public engagement**

19. This part relates to the manner in which the Commission engages, communicates and consults with its stakeholders and the general public.

20. The below table reviews headline evidence from the 2018 Review, and considers key potential barriers and actions.

<b>Equality strand/ group and brief evidence summary</b>	<b>Key potential barriers</b>	<b>Actions</b>
<p><b>Race/ ethnicity (nationalities, languages etc):</b> Based on evidence from those who attended public hearings during the 2018 Review it identified that ethnic minority groups had lower participation rate in the public hearings and potentially other parts of the review.</p> <p>The ethnic mix of communities varies considerably in different areas of the country.</p>	<p>There is a risk that certain ethnic groups may be less likely to make a representation, perhaps due to a lack of understanding of Boundary Reviews, or potential language barriers, or not aware the Review is being undertaken.</p>	<p>In addition to the general promotion of the public consultations, we will be also be looking at a range of targeted advertisement for the local areas and local groups.</p> <p>This includes encouraging Local Authorities to promote the 2023 Review with community groups they work with and providing them with the resources to do this.</p> <p>We will also work with an advertising agency to devise a communication strategy that outlines how our communications can be disseminated to the BAME community.</p> <p>If approached, the Secretariat is also able to provide translation of materials, although any request would need to be considered on a case-by-case basis. This will be set out on our website and in the guidance produced on public hearings.</p>
<p><b>Gender:</b> Based on evidence from those who attended public hearings during the 2018 Review, the attendees to the public hearings were mainly male.</p>	<p>There is a risk that women with caring duties and varying working patterns are prevented them from attending the public hearings and making a representation.</p>	<p>The Commission will continue to publicise the hearings as widely as possible in local areas as well as increasing its social media presence.</p> <p>In addition, we will be looking at a range of targeted advertisement.</p>

		We will also ensure that day one of every public hearing concludes early in the evening (likely between 7-8pm) to provide further opportunities for people to attend and make representations.
<b>Age:</b> Based on evidence from those who attended public hearings during the 20218 Review there were less people from the 18 – 25 age range than the 40 and above participating in the Review.	There is a risk that young people are generally alienated by politics and might associate the Review with politics.	<p>Increasing its social media, looking at a range of targeted advertising.</p> <p>Working with Local Authorities to promote the review with community groups.</p> <p>We will also ensure that day one of every public hearing concludes early in the evening (likely between 7-8pm) to provide further opportunities for people to attend and make representations</p>
<b>Disability:</b> Based on evidence from those who attended public hearings during the 2018 Review, it was apparent that few notified the Commission of any accessibility issues.	n/a	<p>Printed hard copy / different font size of the publication will be made available upon request (again this is published on our website), although these requests will be considered on a case-by-case basis.</p> <p>Hard copies of the proposals will also be made available at places of deposit for every proposed constituency. A list of these places of deposit will be published online.</p> <p>As at the 2018 Review, public hearing venues will also be assessed, including ensuring they have step free access and appropriate hearing loops.</p>
<b>Gender reassignment:</b> n/a	n/a	n/a
<b>Marriage or civil partnership:</b> n/a	n/a	n/a

<b>Religion or belief (this includes lack of belief):</b> n/a	n/a	n/a
<b>Sex and sexual orientation:</b> n/a	n/a	n/a

*Assessment and analysis*

21. During the consultation period, the BCE will adhere to the following principles:

a. Communication of the proposals and the public consultations

- **Communications of the public consultations** – The communications of the public consultation periods will take into consideration reaching a diverse range of communities. These will include national and local media, on the BCE website (including a series of reports to explain the proposals), minority news outlets and social media. Hard copies are sent to places of deposit including local libraries. The BCE also notifies all interested parties including local authorities, MPs and academics.
- **Promotion and publicity of the consultations** - there will be appropriate communication to publicise the consultations and the hearings to the public.

b. Making or viewing representations

- **Representations to the Commission** – These can be made in writing, either via email, through the BCE online portal or by post. Representations may also be made verbally at a public hearing in person. The BCE attaches just as much significance to all forms of representation.
- **Viewing representations** – All the representations received from the public can be viewed via the BCE portal. Arrangements will be made to view a hardcopy of representations if needed, likely at the BCE office.

c. Access to documents

- **Publication** - All our publications will be as accessible as is reasonably practicable on the BCE website, public libraries or from other local places of deposits. Careful considerations have also been taken to ensure that publication can be accessed by all; for example, font style and size. Printed hard copy of the publication request should be made in writing or via phone. These requests will be considered on a case by case basis.

d. Public hearings

The details of the locations and dates will be published in advance of the secondary consultation. The administration of public hearings will adhere to the following accessibility principles:

- **Booking speaking slots** – Speaking slots can be booked online on the BCE website. However people can also via phone or email, or they can book a slot at the hearing on the day. They may however not get their preferred time slot.
- **Physical accessibility** - We will assess the locations of all the public hearings to ensure that people with mobility and a physical impairment are able to attend the hearings with no disadvantage to them. These will include step access free, special seating areas in the front for wheelchair users and the elderly, hearing loops and roving mic.
- **Record of the hearing** – a record of each hearing will be produced in the form of an online video and a written transcript.
- **Attendance** - We also ensure that the locations can be easily accessible via public and private transport;
- **Timings** - The hearing will take place on two consecutive days, starting from 10am to 8.00pm on the first day, and from 9am to 5pm on the following day. This will ensure that as wide range of people as possible can attend the hearings, including those who are working or have caring responsibilities.

## BCE/2021/6th meeting/Paper 5

### Communications evaluation - initial proposals

1. This paper provides a detailed evaluation of the communication activities undertaken by the Commission during the consultation on the initial proposals. The evaluation sets out in detail the communication activities, how they performed and recommendations to consider in formulating the communications strategy ahead of the secondary consultation.

#### Overview of communication activities

2. The table below provides a summary of the communication activities completed during the consultation on the initial proposals. Appendix A, the full-length communications report, provides more detail on each element.

First consultation	
<b>Print</b>	<ul style="list-style-type: none"><li>● Half-page advert in national newspapers on first day of campaign</li></ul>
<b>Social media</b>	<ul style="list-style-type: none"><li>● Paid-for ad campaign on Facebook, including video and images</li></ul>
<b>Digital display</b>	<ul style="list-style-type: none"><li>● Video and digital banners on main news websites through Ozone</li><li>● Placed adverts on Spotify</li></ul>
<b>Search</b>	<ul style="list-style-type: none"><li>● Paid-for search terms campaign on Google and Bing</li></ul>
<b>Stakeholders</b>	<ul style="list-style-type: none"><li>● Partner pack sent to EROs, CEXs, AEA, LGA, and NALC, and placed on website</li><li>● Attended AEA regional branch meetings</li><li>● Published blog from Secretary in LGA magazine</li><li>● Updates in LGA, AEA and NALC bulletins at start and end of consultation</li></ul>
<b>Organic</b>	<ul style="list-style-type: none"><li>● Blogs from Secretariat published on website and promoted via social media</li><li>● Social media channels regularly updated with content</li></ul>
<b>Media</b>	<ul style="list-style-type: none"><li>● Prepared for interviews by investing in training</li><li>● Conducted media briefing and provided information pack</li><li>● Monitored and recorded coverage of the review</li><li>● Participated in radio and TV interviews</li></ul>

#### Performance and recommendations

3. The communication evaluation provides significant detail on the performance of each of the communication activities. At the meeting the team will go through

the results in detail and where applicable, outline how the various activities performed against Government benchmarks. Below is a brief summary of the key recommendations we suggest are considered in devising the communications strategy for the secondary consultation.

#### Print advertising

4. We ran a half-page advert in national newspapers on the first day of the consultation on our initial proposals, to reach as broad an audience as possible on our launch. The advert was developed in collaboration with the creative agency Engine, with a design which complemented our social media adverts. The adverts had an expected circulation of around 4.7 million people. Paying for adverts in national newspapers ensured guaranteed coverage in them, and meant that in the cases where papers ran articles on the review in the same edition, we in theory strengthened our impression on the reader. We ran half-page, instead of full-page, adverts to save costs. However, this is an expensive method of advertising, and we have no way to measure how successful the advert was in grabbing people's attention beyond our own survey question in the website submission form - in which a small proportion of respondents answered 'national newspaper' to the question 'how did you hear about the review'.
5. We therefore recommend considering whether it would be good value for money not to run print adverts in the secondary consultation, and to perhaps run them in the revised proposals period instead.

#### Social media

6. We ran a paid-for advertising campaign on Facebook and Instagram through the buying agency OMD, which included four static images and a 15 second video developed with Engine. Users who engaged with our static adverts were then retargeted with our campaign video. We split our targeted audience into three groups to monitor how well the campaign did among them: BAME, 16-44, and 45+. Through this, we can see that our click-through rate was especially high among the BAME and 45+ groups.
7. We achieved 170,800 clicks on our social media adverts overall, which represents the number of times users were taken to [bcereviews.org.uk](https://bcereviews.org.uk). We exceeded the benchmarks set for the social media campaign, largely due to the strength of our adverts' design. The traffic strand (which aimed to get people to click on the ads served in their feeds and stories) was particularly high, with an almost 1% click through rate and a cost per click of under 30p - a very positive outcome compared to the Government benchmark of a 0.4% click through rate and a cost per click of £1.13. We used a variety of images and ad copy which

meant we could make adjustments during the campaign to optimise our advertising strategy. We managed to key into and engage a broad audience with social media, and as it provided good value for money we would recommend using this method again.

#### Digital display

8. We paid for our short campaign video and several digital banners to appear on a number of news websites through the advertising network Ozone. News websites were chosen in order to target the broadest audience possible, and using Ozone provided us with brand-safe websites we could advertise on without risk. We served people with our campaign video, and then retargeted those who watched it with banner adverts in order to reinforce the message. Users could click on any of the adverts in order to be taken to the consultation portal.
9. The digital display campaign surpassed the benchmarks of clicks and click through rate which were set. It achieved 3,338 clicks and 360,973 views of our video content. As part of this campaign, we also ran adverts on the music streaming platform Spotify, which allowed us to engage a younger demographic. Adverts would serve only when the app was open and in focus, and performed better on desktop than on mobile. We achieved approximately 10k clicks on the advert in total through Spotify, and reached just under 600k unique users. The display campaign in general was less wide-reaching than social media and pulled fewer people through to the portal; however, it is still a medium worth considering for the future as it engages an audience beyond social media platforms.

#### Search

10. We paid for adverts that would be served to the public when they searched for a related term on Google or Bing. The search terms could be an exact or a broad match to the wording we selected, which helped us to key into a broader audience. This ensured the [bcereviews.org.uk](http://bcereviews.org.uk) web address was the first link that appeared to grab people's attention and hopefully push them through to the portal.
11. The paid search campaign generated around 19,500 clicks on the adverts, with a click through rate of 14.4%. This is a much higher click through rate than expected, but the number of clicks overall is lower than our agreed benchmark. This is due to a lower search volume than was estimated by OMD - i.e. fewer people searching for terms relating to the campaign than expected during that period. The cost per click was also brought up by low numbers of clicks on Bing, which we were advised to use to key into an audience, perhaps older,

who have it as their default search engine. In the future we would recommend just using Google.

## Stakeholders

12. We started reaching out to stakeholders early, and held meetings with the Association of Electoral Administrators (AEA), the Local Government Association (LGA), and the National Association of Local Councils (NALC) to discuss how we could make it as easy as possible for them to help raise awareness of the review among their audiences.
13. On the launch day of our initial proposals, we distributed to the above organisations - as well as all Electoral Registration Officers and local authority Chief Executives - a 'partner pack' of useful communications materials. This included a fact sheet, sample posts for social media, sample text for their websites or bulletins, and more. This was downloaded more than 1,600 times in total and used by a variety of organisations and authorities.
14. We ran a survey of stakeholders for the first time, and received very positive feedback about the partner pack. We would recommend producing a similar version for the next consultation. Almost all respondents found the pack was sent out at an appropriate time, but as a few thought that they would have appreciated more warning, we would recommend next time getting in touch some time before the launch to trail it. As well as producing the pack, BCE staff attended all regional AEA branch meetings to promote the review; we also distributed content such as blogs and brief updates throughout the consultation in stakeholder e-bulletins and a magazine. We should continue to keep in regular contact with our stakeholders, both in and outside of consultation periods; for example, speaking at national conferences.

## Organic communications

15. 'Organic' here refers to all communications which were produced and distributed in-house rather than paid for through an external agency. Alongside our paid-for social media campaign, we pushed complementary content on our Twitter and Facebook channels, as well as an Instagram account which we set up for the consultation. We received good engagement on our own social media channels, with a higher level on Twitter. We should continue to build engagement by posting regularly in the run up to and during the next consultation - this will be important during the promotion of public hearings. We also published blogs and news updates on our website, and promoted them via social media - we recommend continuing to use these or something similar to provide a variety of content in our communications. The blogs were written from the perspective of different members of the Commission, to give an insight into

our work and encourage representations; we also tracked the number of visitors to the webpages who then clicked on the portal web address within it. During the campaign period, our corporate website received over 100k visits, and bcereviews.org.uk received over 300k.

## Media

16. We held a briefing for journalists before the launch, where we provided information about the review over the call and in a handbook, and stated our availability for interviews at the time the initial proposals were published. We prepared for interviews in the run up to the launch by investing in training. This meant that when we were offered interviews during the consultation, our spokespeople were able to communicate our key messages clearly. We received 486 pieces of news coverage overall, including nine interviews given by the Secretariat, and the vast majority of coverage was balanced. We also provided responses to journalists' enquiries throughout the consultation. The initial high volume of media interest did wane as expected after the first week, before building up again at the end, but regional coverage carried on more steadily than national outlets throughout. We should continue to build our stakeholder list of news outlets to ensure proportional representation from each region.



# Boundary Commission for England

Appendix A

## **Communications evaluation: The publication of the 2023 Boundary Review initial proposals and public consultation**

8 June to 2 August 2021

November 2021

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# 1. Introduction

1. The Boundary Commission for England (BCE) is currently conducting an independent review of Parliamentary constituencies in England. The final recommendations will be submitted to Parliament by 1 July 2023. As part of the 2023 Boundary Review process, the Commission provides opportunities for members of the public to comment on proposals drafted by the Commission to ensure they both include consideration of public opinion and meet legislative requirements. The first consultation began with the publication of initial proposals for new constituency boundaries on 8 June 2021, and ended after eight weeks on 2 August. Before and during this period the Commission conducted a campaign aiming to raise awareness of the 2023 Boundary Review, and to encourage participation in the public consultation.

## 1.1. What we did

2. Following the publication of the initial proposals for new constituencies on 8 June 2021, we launched an eight week campaign promoting the public consultation and the 2023 Boundary Review more generally. We had collaborated with the creative agency Engine, to develop the advertising for the review, and with OMD, the media buying agency, to organise the distribution of these adverts in print and online. On 8 June, we placed an advert in 11 national newspapers to run on this date only. We also began our online campaign, which continued throughout the consultation period. This included the use of graphics and video on Facebook, Instagram, and Spotify; paid-for search results on Google and Bing; and digital banners through biddable advertising.
3. Alongside this paid content, we distributed social media content through our own channels (Facebook, Twitter, and Instagram) and published news pieces and blogs on our corporate website. Before the launch of the public consultation, we held a briefing for national and regional journalists across the country to provide information about the review and aid coverage. Several members of BCE staff received training via an external company to help them deliver key messages, and during the consultation were interviewed by radio and TV channels. The press phone and inbox were monitored by the Communications Manager, who responded to queries from journalists and provided quotes which encouraged participation through the consultation portal. Press releases were issued under embargo at the beginning and end of the consultation period. Prior to the launch, we built upon our relationships with stakeholders, such as the Local Government Association (LGA), and organised the distribution of content through their channels, including magazines, email bulletins and social media posts; a 'partner pack' was also provided, encouraging

stakeholders to continue raising awareness of the review using the template content as inspiration.

## 1.1.1. Objectives

4. The aim of communications issued during the campaign was to:
  - **Engage** with the public, encouraging as many people as possible to view proposals and provide responses via the consultation portal. Furthermore, engage with a political audience, including political parties and every MP, to raise awareness of the review and to provide information about the boundary review process.
  - **Educate** constituents about the role of the Commission. Increase awareness that the boundary review is a fair and open process which is based on evidence and data. Position the process as a genuine consultation process, rather than having a predetermined outcome.
  - **Inform** constituents that the boundary review is taking place. Ensure as many people as possible know they have the opportunity to have their say and how to do this.
  - **Reassure** constituents that 'day-to-day life' (for instance, bin collections and local schools) will not change.

## 1.1.2. Strategy

5. Our strategy built on the lessons learned during the previous 2018 review. As we knew it would prove the best campaign method in terms of results and value for money, the majority of our advertising took place online. We distributed our advertising across multiple channels with the aim of reaching as many people as possible. Using our relationships with stakeholders and journalists, we also aimed to position our communications as locally as possible. A key consideration from the start of our planning was how we could best reach underrepresented groups. Our advertising audience was therefore separated into BAME, 16-44, and 45+ allowing us to better monitor our engagement within these groups and adapt the platforms and adverts used as needed.
6. We had a proactive approach to engaging with the press and media, holding a pre-launch briefing and providing media handbooks to clearly communicate our key messages and the review process; from launch day onwards, we accepted each interview invite given in order to raise awareness as widely as possible, and provided appropriate responses to press queries throughout the consultation.
7. We ensured alternative methods of providing a response were available to constituents who did not have online access. The materials for our initial proposals were provided in HTML format via our website (a more accessible format, for example when using assistive technology such as screen readers), and in hard copies in places of deposit in each region. We provided the list of venues where

these copies were available on our website. Members of the public could also get in touch via email or phone for help in getting hold of the materials. After the consultation concluded, Review Officers contacted the places of deposit to get an estimate of the number of visitors to the initial proposal materials. Visitor numbers were on the whole very low, and many venues recorded no visitors to the hard copies at all.

### 1.1.3. Key messages

8. Through our communications during the campaign, we aimed to deliver the following key messages:
  - **Have your say:** We want to hear your views, even if your area is not changing. If you support our proposals, tell us - and tell us why. If you don't support our proposals, then tell us why, and propose an alternative. We know that local people have insight and knowledge that can affect the boundaries being reviewed. We consider every piece of feedback that is received, and this is your chance to have a say.
  - **Easy to do:** Through our portal, it is easy to view the proposed boundaries for your local area and provide feedback.
  - **Critical part of our democracy:** Reviewing constituency boundaries is an essential process to make sure that individual votes are of broadly equal weight.
  - **Fair and impartial:** Boundary Commission for England is an independent and impartial public body.

## 1.2. Key results

9. The first public consultation received 34,423 representations over the eight-week period. 32,723 of these representations (95%) were made through the portal, [bcereviews.org.uk](https://bcereviews.org.uk). This exceeds our target of 85-90% of feedback to be received through this channel and this result can be attributed to the success of the advertising campaign in driving members of the public towards the portal. Approximately 1000 representations were sent via email, and 600 via letter. The number of representations constitutes an increase of 70% from the total of 19,215 received during the first initial proposals consultation of the 2018 Boundary Review, 88% of which were made via the portal.
10. We achieved a wide reach with our online campaign, and succeeded in driving through over 200k clicks in total across to our [bcereviews.org.uk](https://bcereviews.org.uk) site. The total impressions across each platform exceeded 31 million. Breaking down the engagement on each platform, we achieved a click through rate of 0.27% for display, 14.64% for paid search, and 0.63% for social. Most of our advertising platforms exceeded all benchmarks, which were based on industry standards for government campaigns. Paid search did not perform as expected in certain objectives, which this report will address.

11. Our paid ad appeared in 11 national newspapers (Daily Mirror, Daily Star, Daily Express, Evening standard, Metro, Daily Mail, I Newspaper, Daily Telegraph, Guardian, Sun, and The Times) on the first day of the campaign only. Throughout the eight week consultation period, we received 486 pieces of news coverage. The majority of this coverage was from regional newspapers. The volume of regional coverage helped achieve our goal of communicating as locally as possible to members of the public, and demonstrated the level of interest amongst communities.

## 2. Media

### 2.1. What we did

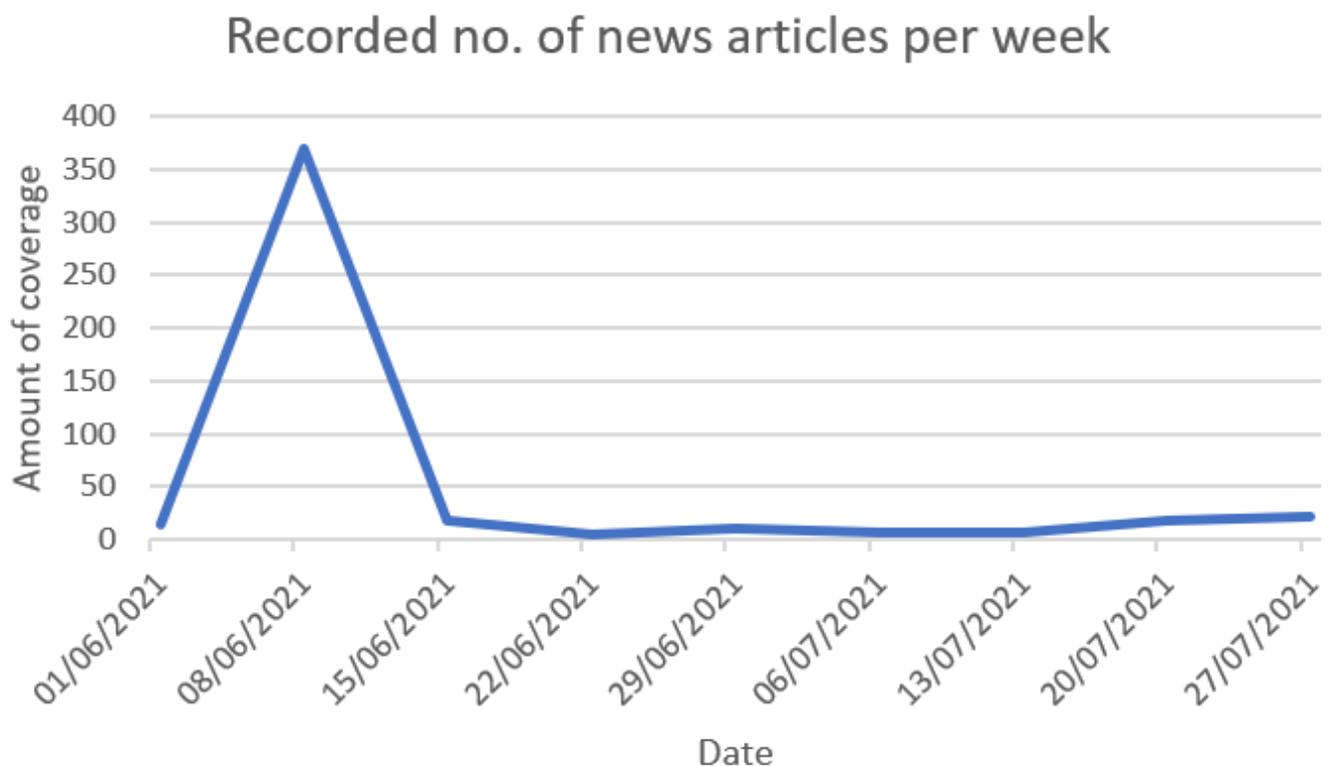
12. We knew from the pattern of coverage during the previous 2018 Boundary Review that the highest amount of press interest for interviews would occur on the publication date for the initial proposals, and that coverage by national papers would decrease while regional coverage continued as the public consultation went on. This pattern held true for the 2023 Boundary Review.
13. Preparations were made in order to capitalise on the media interest around the launch of the initial proposals. Invitations to an online pre-launch media briefing were sent to all regional and national journalists on the stakeholder contact list. During the briefing, the Secretary to the Commission provided an overview of the review and consultation process, and information about the Commission's availability for interviews. The content of the briefing was also distributed in a media handbook to the approximately 1,200 journalist addresses on the stakeholder list. Before the midnight publication of the initial proposals on the Commission website, a press pack containing the initial proposals and press release was sent to this list.
14. To prepare for their role as spokespeople, the Secretary to the Commission, Deputy Secretary to the Commission, Head of Corporate Services and a Review Manager took part in media training provided by external company Cameron Communications prior to the launch. The training offered a valuable opportunity to practice communicating clearly the Commission's key messages, and this preparation was reflected in the interviews given on TV and radio channels during the first week of the consultation and in a further interview later in the campaign. Throughout the consultation, coverage (both interviews and articles) was monitored and recorded for the future reference of the Commission. Requests for comment or information through the dedicated press line and inbox were responded to by the Communications Manager. After the first week of the consultation, as expected, interview requests and coverage from national papers greatly waned and regional coverage continued. To aid in coverage of the end of the consultation period, we issued a press release to journalists and the Secretary to the Commission gave a regional TV interview. The data demonstrates a jump in representations on that date.

## 2.2. Evaluation

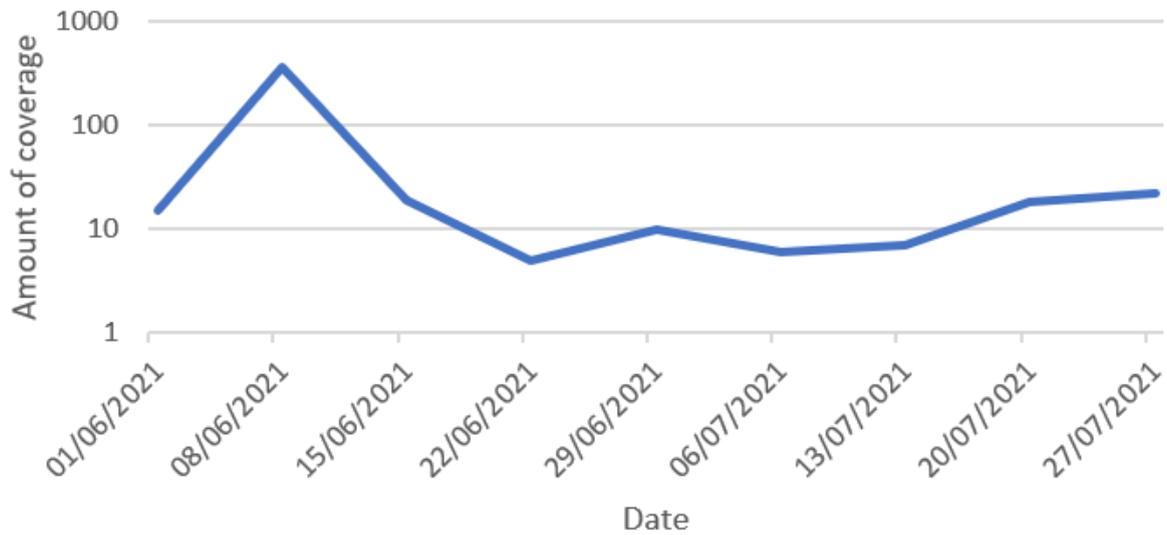
### 2.2.1. Outputs

15. Google Alerts, a free service, was used to monitor coverage of the Commission and public consultation. This was used to populate a 'media tracker' spreadsheet held by the Communications Manager which serves as a record of all identified news coverage and enables an evaluation of reportage.

16. The following graphs show the number of news articles published per week throughout the campaign period. Due to the high volume of articles at the beginning of the consultation, the rest of the graph is compressed and it is difficult to see the pattern. Another version is provided below following a logarithmic scale, which multiplies the axis by a factor of 10 and reduces the effect caused by the large range in volumes.

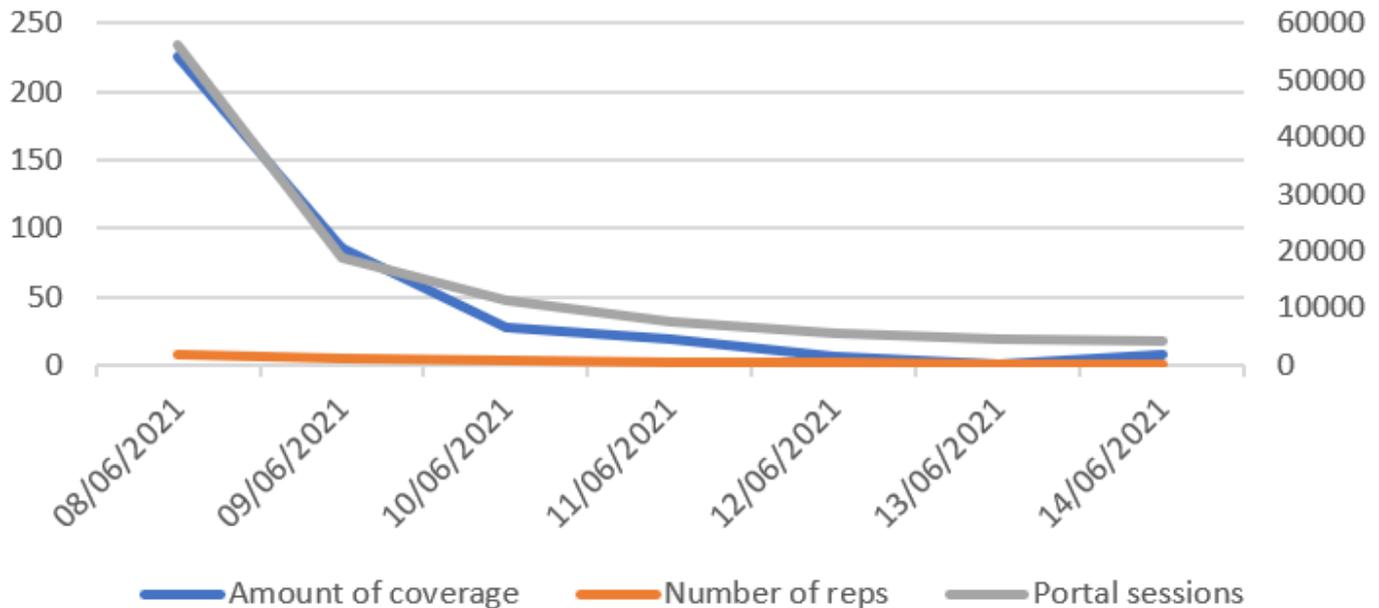


### Recorded no. of news articles per week (logarithmic scale)



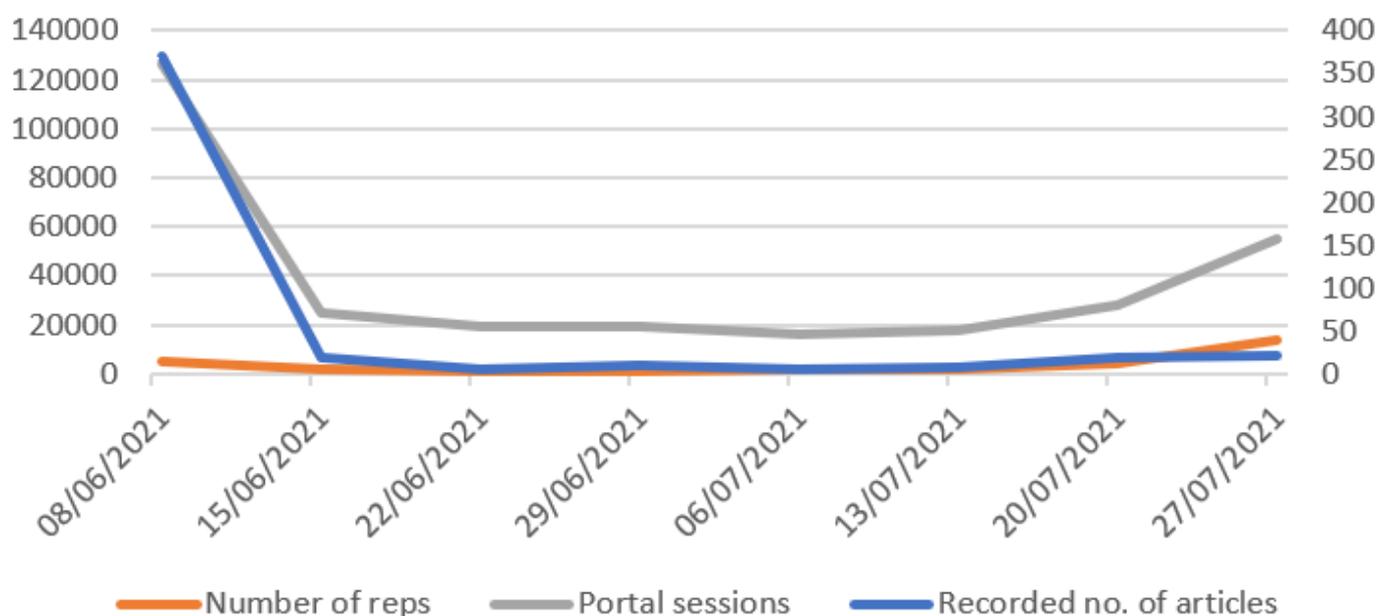
The following graph displays the number of news articles published during the first week of the consultation, compared with the number of representations made and the volume of sessions on the bcereviews.org.uk site.

### The first week of the consultation: amount of coverage vs no. of reps vs no. of portal sessions



The next graph makes the same comparison, but across the whole consultation period.

## Number of representations vs news articles vs portal sessions



17. Our record of coverage shows that 15 articles were published between 2 June and 7 June, in the period between the media briefing held by the Commission and before the launch. Most used information given during the briefing. Several touched upon the prospect of a 'Devonwall' constituency, a topic broached by a journalist during the Q&A, since the Secretary could not reject this as a possibility prior to the publication of the proposals.

18. During the public consultation, we received 486 pieces of coverage, including 9 interviews given by Commission spokespeople on TV or radio and 477 published news articles. The number of articles is a 152% increase in the total of 189 recorded during the first consultation of the 2018 Boundary Review. As expected, the vast majority (374, or 78%) of articles were published during the first week of the consultation (8 to 14 June). In some cases, news articles were published in the same editions as our paid-for advertisements, therefore maximising the attention given by the reader. Around 86% of articles were published by regional news outlets, constituting an increase of 6% from the proportion recorded during the previous review. The coverage was produced by approximately 280 unique outlets - a good result as it means that coverage was not limited to a handful of publications but spread more widely to have a further reach. Coverage on the radio or TV not arranged via interview may have been missed, as this is generally more difficult to monitor.

19. Our investment in training spokespeople before the launch of the review via a communications firm paid off. This was reflected in our staff's ability to insert the key messages of the campaign into conversations with interviewers, and to deal

appropriately with difficult questions or topics during interviews. This is demonstrated in the excerpts below in Annex A.

20. The table below shows a breakdown of the number of news articles about the review published in each region.

<b>Region of outlet</b>	<b>Total news articles</b>
South East	81
National	66
North West	65
Eastern	48
West Midlands	48
South West	44
East Midlands	37
Yorkshire and the Humber	37
London	36
North East	15
<b>Total</b>	<b>477</b>

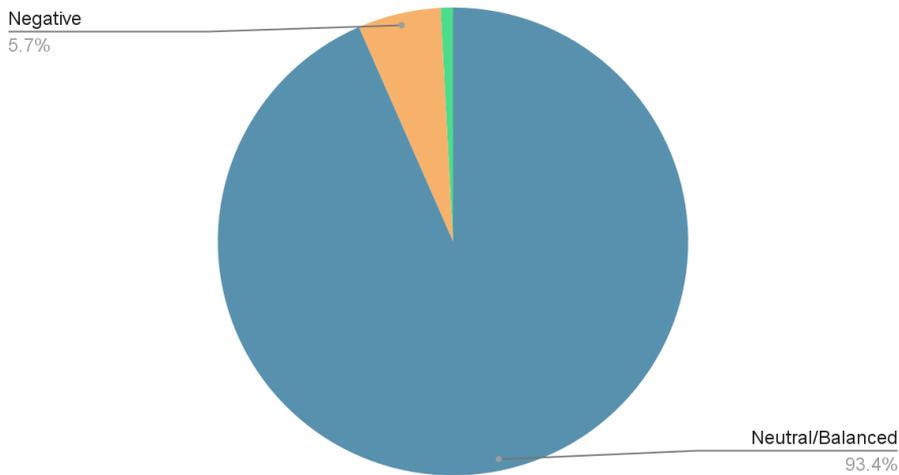
## 2.2.2. Impact

21. As previously stated, the amount of coverage we received through articles during the first consultation is vastly greater than during the equivalent phase of the 2018 Boundary Review, which had a longer consultation (campaign) period. This, along with running an effective online and print campaign, may account for the large increase in representations received compared to the previous review. We did not receive as many requests for interviews from national outlets as last time.

22. There was a high proportion of coverage from regional outlets (86%) as opposed to national newspapers, indicating the extent of interest in local areas about changes which might affect them. As expected, there was a steep drop in articles covering the Review after the first few days post-launch. While most coverage from national outlets was published at the launch of the proposals, regional coverage also continued throughout the campaign. This helped to keep raising awareness of the review and driving people towards the portal even without any public hearings occurring to serve as catalysts for coverage in local areas.

23. The vast majority of coverage was balanced. This was usually helped by the inclusion of text from the press release; quotes lifted from the media briefing, or interviews given by BCE spokespeople; or responses given directly to journalists' enquiries via the Press Office. This meant that articles which may otherwise have proved wholly negative had a form of balance given to them by information provided by us which affirmed the Commission's independence, that local views would be taken into account, the reason for the review, and the website link. An example is [this article](#) by Brighton & Hove news. A significant percentage of total news articles (37%) used the provided content in this way, mostly from the press release; the quote from the Secretary was used a great deal, while many journalists chose to lift large swathes of text directly from the press release to craft an article ([example here from the Sussex Express](#)).

Sentiment of news coverage



24. Most of the wholly negative coverage was published by outlets from the South East region (6 articles) - this was followed by West Midlands and the North West at 5 articles each - which corresponds roughly in proportion with the volume of coverage produced from that region.

25. Only under 4% of the total news articles recorded did not include any of the key messages. A large majority (84%) included at least one key message in their coverage. National coverage was far less likely to include the website address for the consultation portal, with 77% of news articles omitting the link. We can compare this trend to the previous review, where roughly half of national coverage included the portal address.

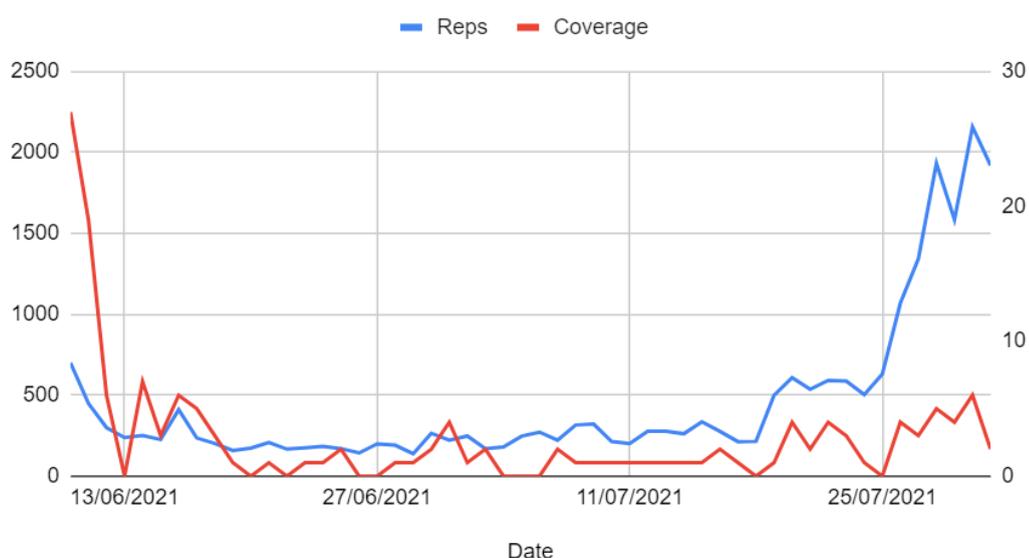
Key message	Included	Not included	Under paywall
Consultation portal or website address	55%	44%	1%
Independence, impartiality, or fairness of the Commission/ the Review	25%	74%	1%
Why the review is taking place	84%	14%	1%

Local views are taken into account	75%	23%	1%
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Figures are rounded to the nearest whole number.

26. The graph below shows the number of daily representations vs the volume of coverage. To reduce distortion caused by the highest peaks and show more clearly the fluctuations during the campaign, the first two and last two days are excluded. We can see a large jump in representations at the time of the BBC East Midlands television interview with the Secretary to the Commission.

Number of reps vs. coverage (excluding beginning and end)



## 2.2.3. Lessons learned

27. In order to achieve our aims of raising awareness of the 2023 Boundary Review and increase participation through our consultation portal, our task was to achieve coverage that was high both in volume and in quality. We had a great deal of success in attracting effective coverage of the review, which can be measured in the number of recorded news articles, both regional and national, as well as their balanced or neutral nature; a high proportion of this coverage also carried the key messages of the campaign, thus helping to ensure the most important information about the consultation was communicated.

28. It is recommended that we continue our proactive approach to the media. By reaching out to journalists before the launch of the initial proposals with our media handbook, and providing the opportunity to ask questions during our media briefing, we built relationships which paid off in good quality and frequent coverage and minimised the risk of inaccurate reporting. We made it as easy as possible for journalists to cover the review effectively by providing informative content in the form of press releases at key points of the campaign. This was shown to be successful by the amount of articles which were shaped using the press releases, and therefore

benefitted from the inclusion of key information and overall balance. We should continue to maintain our stakeholder list of journalists. Since the North East produced the least amount of coverage, we must seek out and build links with more publications in that region.

29. We received fewer invitations to interviews than we might have hoped for, but followed a policy of generally accepting every offer to maximise our reach. This is largely out of our control and dependent on the news cycle, but in future campaigns we should continue to ensure we assert our availability for interviews in pre-launch communications with the media. We were well prepared for interviews we did take part in, and made the coverage as useful and effective as possible. We should not need formal training again and can use our experience going forward in the review.
30. It is also important that coverage portrays the Boundary Commission accurately as an independent and impartial organisation, and the review process as the same. This was the least included key message, and should perhaps be more prominently included in communications. The omission of the consultation portal link from some news articles, and particularly articles from national outlets, also reduced the effectiveness of some coverage. Press releases (perhaps in the notes to the editor) and the media handbook should strongly encourage its inclusion. However, it can be noted that if a member of the public was unsure where to find the website after reading an article, and searched for a term such as 'boundary review', they would be directed to the site via our paid-for search campaign and being the top result on Google for most boundary review related search terms.
31. National coverage helped to raise awareness of the review, with the large readership of these outlets; however, regional coverage, which continued more frequently after the initial launch, helped to drill down to audiences at a local level and demonstrated the level of interest in the impact of changes to communities. The importance of encouraging coverage at both a regional and national level should therefore be kept in mind.

## **3. Organic channels**

### **3.1. What we did**

32. To get the most out of our paid-for advertising campaign, we ran a complementary campaign on our already existing channels. We posted organic content on our corporate website and social media channels aiming both to raise awareness about the review and to inform. As well as adapting the graphics made for us by Engine, we designed our own appealing content via the free design website Canva and our paid-for software InDesign that would enhance the effect of our paid-for posts. We made accessibility a key consideration when designing and publishing content online and followed government guidelines on this. After conducting research on the use of social media by government departments and public bodies, we made sure that each

post was accompanied by an image to capitalise on algorithms and to help with engagement. The intention was to update the style of the Commission's output on social media, with a more professional and visually effective appearance.

## 3.2. Evaluation

### 3.2.1 Outputs

33. On the website, we published informative news articles which were then promoted via social media. Prior to the launch of the review, our 'Guide to the 2023 Review', explaining in detail the policies and processes to which the Commission adheres, was published in an accessible HTML format (and downloadable as a PDF) on the website and shared via Twitter and Facebook. Starting in the lead-up to the launch, we also regularly posted blogs written by the Communications Manager on the behalf of staff in a variety of different roles in the Commission, to allow the public to take a look 'behind the scenes' at the work taking place during the review. These blogs, written from the perspectives of the Commissioner, Secretary, Head of Corporate Services, Review Manager and two Review Officers, not only explained the process of the boundary review but the 'why' and 'how' members of the public should submit their views on the initial proposals. These blogs were written with an engaging and informal tone, intended to draw in an audience who may be interested in the review but unfamiliar with the Commission itself, and who might prefer this style of content to a traditional news article.

#### **Time is running out: have your say on our initial proposals for new constituencies**

20 July, 2021



*Brendan Connell-French, Review Officer*

Just under two weeks remain before the public consultation on our suggested new constituencies closes at midnight on 2 August.

It's fantastic that so many people have responded so far. At the time of publishing this blog, we've had over 13,000 submissions, and our team will read and consider each one during the development of our revised proposals. However, if you haven't yet visited [bcereviews.org.uk](https://bcereviews.org.uk) to submit your views on the suggested boundary lines or constituency names for your area, there's still time – it's quick and easy to do.

*Extract of a blog from a Review Officer, published 20 July.*

34. Alongside the content on our website, we regularly published material on our main social media channels, Facebook and Twitter, as well as our Instagram account, which launched at the start of the consultation in order to capitalise on any interest on this site garnered by the paid-for campaign. Before the publication of the initial proposals, we started to increase the frequency of our posts to build up our audience and trail the launch. To increase engagement, our strategy was to make our content as visually appealing as possible - posts could not be 'text only', but must be accompanied by an engaging image. This is in line with the social media strategy of government departments. The accessibility of our social media posts are paramount to their design. For example, the alternate text tool is used to ensure images can be 'read' by assistive technology, and we check the contrast of coloured backgrounds and text where needed to make sure they are compliant with the standard for accessibility. To enhance our paid-for online campaign, we made use of the social media graphics and video developed by Engine, and adapted them where needed using design software such as InDesign and Canva.



*Above: organic post shared on Twitter on launch day; right: Facebook post, using one of the campaign graphics*

35. We monitored social media to horizon scan for anything online that we should be aware of (for example, making review officers aware of upcoming petitions). Our social media plan was flexible and we were able to adapt our messaging where suitable based on our experience. For example, on hearing from review officers that some members of the public were unsure whether their council services would be affected, we published content addressing this concern (prior to the launch, we had also ensured this was explained in our materials sent to councils for distribution).



Boundary Commission for England @BCEReviews · Jul 13



We've asked for your feedback on our suggested new Parliamentary constituencies (the area an MP is elected to represent in Parliament). To see our proposals for your area, go to [bcereviews.org.uk](https://bcereviews.org.uk) and submit your views before our consultation closes on 2 August.

The infographic is titled "What might the 2023 Boundary Review change in my local area?". It features a blue header with the Boundary Commission for England logo. The main content is organized into three rows. The first two rows have green checkmarks and are connected by a green arrow to a central text box. The third row has a red 'X' and is connected by a red arrow to a separate text box. At the bottom, there is a blue bar with the website URL and the Twitter handle.

Change	Status	Notes
Where the boundary lines of my Parliamentary constituency fall	Yes (Green checkmark)	Go to <a href="https://bcereviews.org.uk">bcereviews.org.uk</a> to see our proposed constituency for your local area. Your feedback matters - tell us what you think via our website before 2 August.
What my constituency is called	Yes (Green checkmark)	
My local council services, such as bin collections or schools	No (Red X)	These are set by your local authority, and local authority boundaries aren't changed by this review.

[bcereviews.org.uk](https://bcereviews.org.uk) @bcereviews

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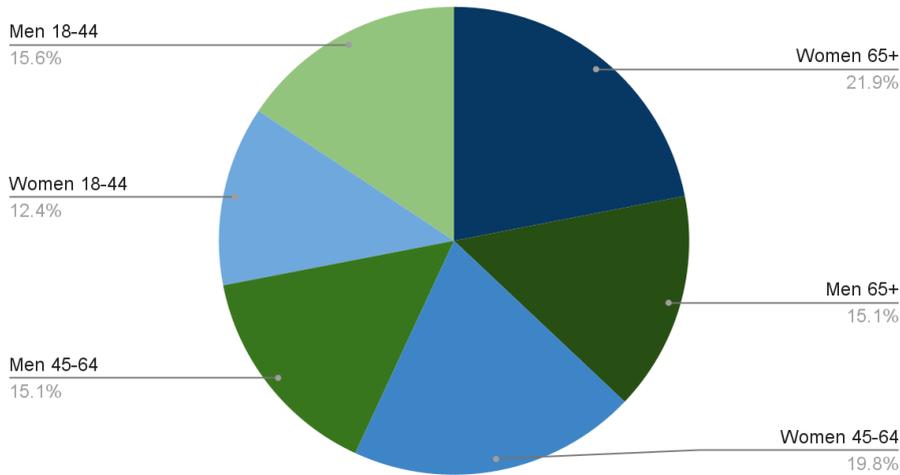
36. We also published on our YouTube channel a helpful animation and shared this via Twitter and Facebook. This was a short video (1 minute and 22 seconds) explaining the process of the review in brief and understandable terms.

## 3.2.2. Impact

### Facebook and Twitter

37. We have 6731 page followers on Facebook, and 3023 followers on Twitter; however, the level of audience engagement with our posts is much higher on Twitter. Our audience demographic on Facebook skews more female (54.2% of the total audience) and older. The gender ratio is proportional to the percentage of female Facebook users in the UK as a whole (52%), although we have an older-than-average audience, since the largest share of Facebook users in the UK is the 25-34 age bracket. In the UK as a whole, only 9% of users are aged 65 and above, compared to around a third of our own audience. The full breakdown of our own audience by age and gender is given below. Unfortunately, this data was not available from Twitter for comparison.

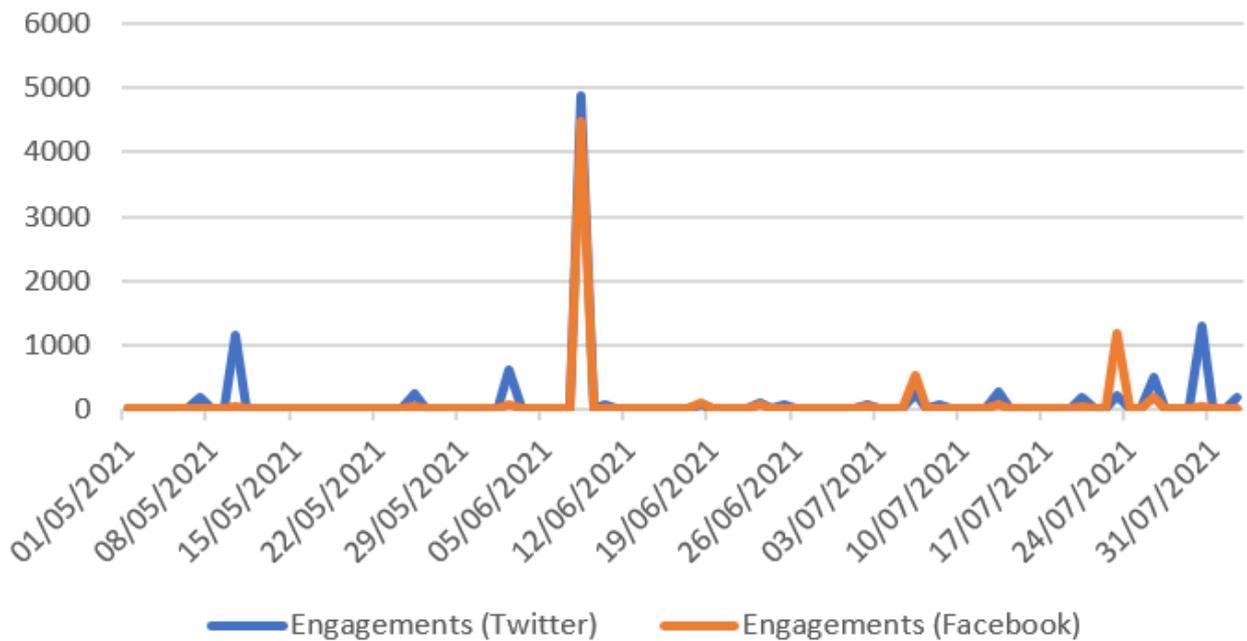
### Facebook audience by age and gender



38. We received a good level of engagement with our organic social media posts. Interest was first generated by the release of the Guide to the Review and the announcement of the proposals launch date, but as expected, the highest peak by far on both channels took place on 8 June.

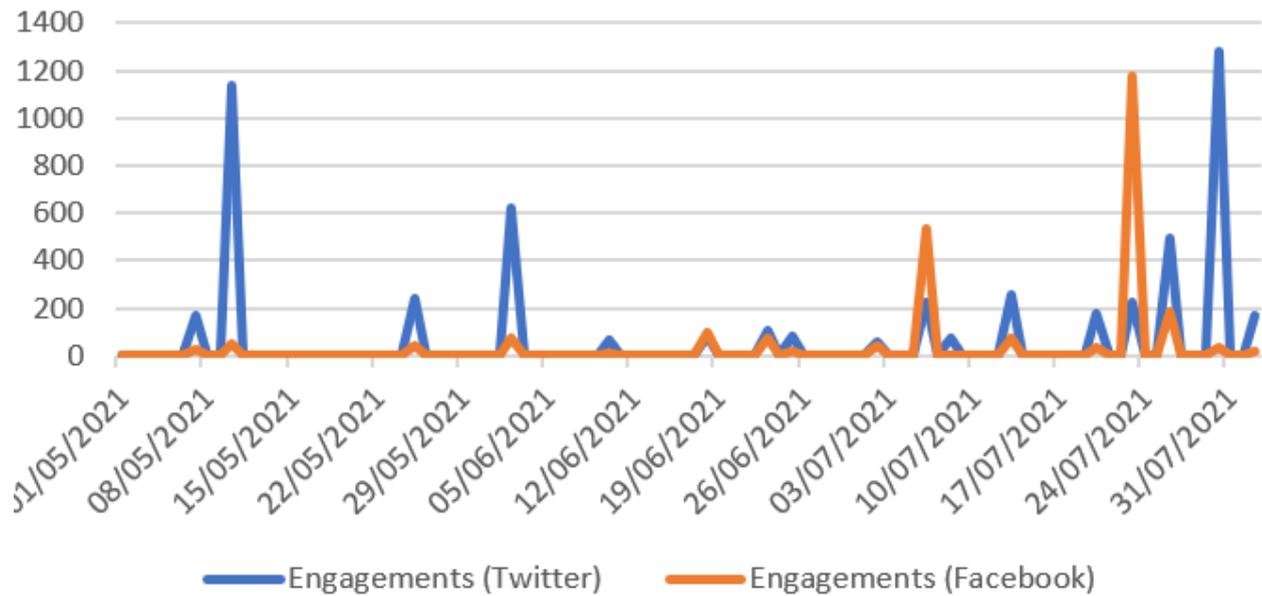
39. The following graphs show the pattern of engagement on our main social media channels. For instances where multiple posts occurred in one day (for example, 8 June), engagement or impressions are added to create a total.

### Total engagement per post, Twitter vs Facebook



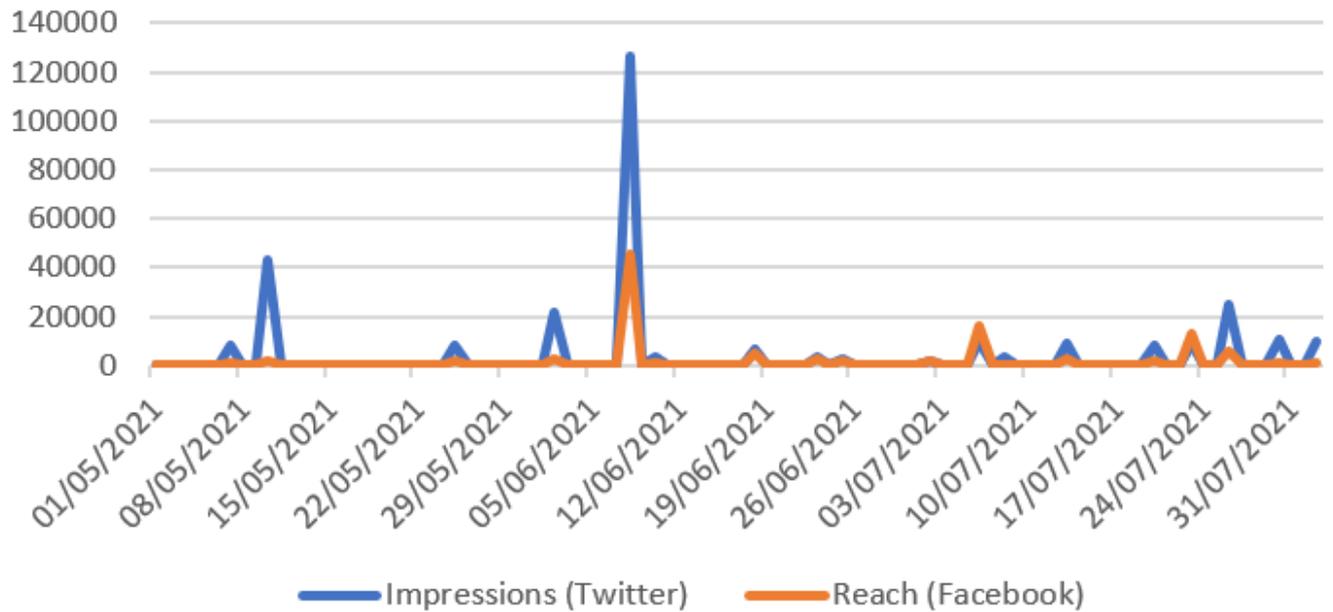
To make it easier to compare the pattern of engagement on both channels, the next graph excludes that peak to reduce distortion.

## Total engagements per post, Twitter vs Facebook, excluding 8 June



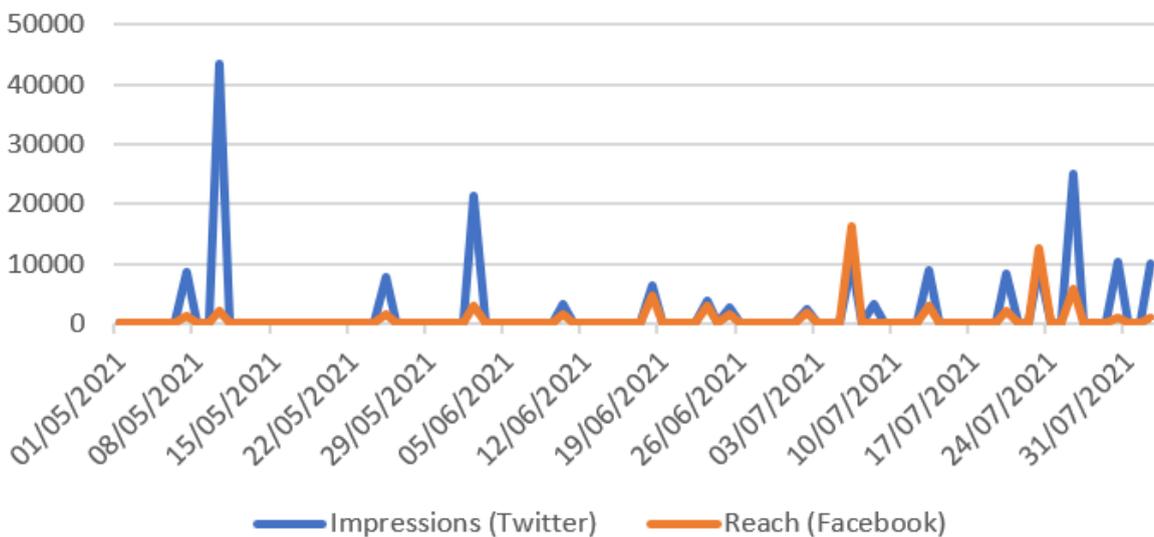
40. We can see that while there are still significant peaks in engagement on Facebook, Twitter receives more engagement more regularly - even with half the number of followers.
41. While it is easier to compare engagement - which measures clicks, likes, and shares - it is harder to compare views of our adverts on Facebook and Twitter, as the two sites use different metrics. Facebook measures reach, which they define as the number of people who saw the advert at least once. Twitter provides the number of impressions, measuring the number of times a tweet appears on a user's timeline - which may include multiple views of ads by the same people. The graphs below cannot compare like with like, as the number of impressions for Twitter will necessarily be higher. However the graphs are nonetheless included below to show the pattern of these two metrics and to compare the numbers of people who came into contact with a BCE post.

## Comparing impressions on Twitter vs reach on Facebook



The next graph shows the same data with the exception of 8 June, to again reduce distortion caused by the highest peak and show more clearly the fluctuations during the campaign.

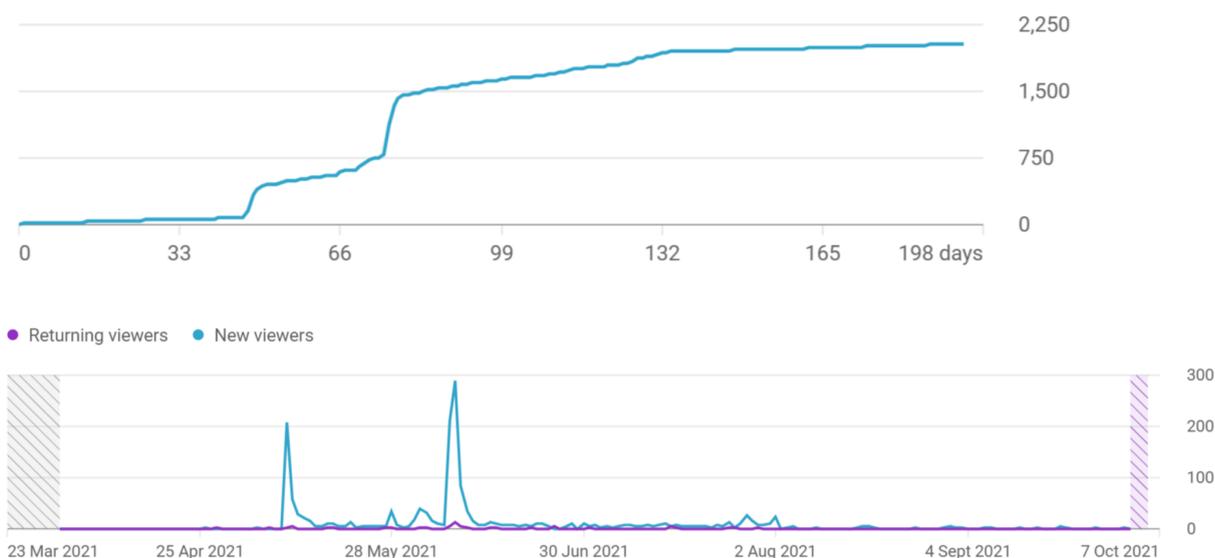
## Comparing impressions on Twitter vs reach on Facebook, excluding 8 June



42. Even with the upscaled ‘impressions’ metric used by Twitter, there are still posts where Facebook’s reach is not insignificant; the post around the halfway mark of the consultation on 6 July performed at a much higher level than Twitter. Pushing copy centred around the deadline for the end of the consultation and providing a countdown led to an improvement in engagement in the latter half of the campaign.
43. We shared the 15-second campaign ad produced by Engine on both social media channels. It received much more attention on Twitter than on Facebook (1.2k and 258 views respectively).

### YouTube video

44. Our animated YouTube video explaining the process of the 2023 Boundary Review in brief has received 2,032 views. The graph below shows the rise in views on 10 May, as the date for the initial proposals publication was announced, and the second steep rise occurs on the launch date when it was first pushed out on social media.



45. YouTube’s information around audience retention gives us an insight into how the video was received. According to the site, 69% of viewers are still watching the video at around the 30 seconds mark, which is typical according to YouTube’s own analysis. The average view duration was 55 seconds long, giving an average for the percentage viewed at 67%. We knew that most of our audience would not want to watch a very long, in-depth video, and so these statistics support our decision to create a video which provides information about the review in as succinct a manner as possible.
46. According to YouTube’s audience demographic figures, our audience for the video was 74.4% male and 25.6% female - this is a wider split than the UK-wide estimate of 57% male and 43% female YouTuber users - and solely from the 65+ age group. However, as the site doesn’t seem to have taken into account any views from BCE

staff, particularly in its age demographic calculations, the accuracy of these statistics must be viewed with some caution.

47. The majority of total views (68%) came from our website, where it is an embedded video on our homepage. Another 9.3% came from Twitter, who watched the highest percentage of the video at 77%, and 7.4% of views originated from Facebook (with an average percentage viewed figure of 61.7%).

#### Tracked links

48. While not previously used with any regularity by the Boundary Commission, Bitly links provided a further innovative and useful method of keeping track of public engagement with BCE content online. This is a free website which allows users both to shorten URLs and monitor the number of link clicks. By combining this with [Google's own campaign URL builder](#) tool and using UTM parameters, it is possible to dig down further into available statistics for engagement and track how many times a link was clicked on individual websites. This allows us to compare how well content managed to generate engagement on various platforms, and to provide a free method of analysis where built-in tools are currently not available to us. For example, while we do not currently pay for WordPress to monitor the number of times a link is clicked within a page on our website, this provides a method of doing so when needed at no cost.

49. Example:

[https://www.bcereviews.org.uk/?utm\\_source=glennblog&utm\\_medium=corpwebsite&utm\\_campaign=bcereviewslaunch](https://www.bcereviews.org.uk/?utm_source=glennblog&utm_medium=corpwebsite&utm_campaign=bcereviewslaunch) (Long URL)  
<https://bit.ly/3xdFUH1> (Shortened Bitly link)

The table below gives a breakdown of audience engagement with a selection of blogs, news releases and resources published by BCE before, during or after the public consultation. 'Clicks' refers to the number of clicks through Bitly links, which we used to help monitor engagement with our content. The number of impressions and reach are also given where applicable for social media posts.

Content	Impact via social media		No. of clicks on link to portal	Other	Direct-to-webpage visits (Data taken from Google Analytics)*
	Twitter	Facebook			
<u>3 August</u> <b>Blog, Wotey Tannoh:</b> <i>The public consultation for our initial proposals has closed: What happens now?</i>	Clicks through bitly link: <b>95</b>  Impressions: <b>3,954</b>	Clicks: <b>19</b>  Reach: <b>1,194</b>	N/A (post-launch)	From news release: <b>273</b>	Data not available
<u>3 August</u> <b>Guide to the Review</b> (promoted again)	Clicks: <b>48</b>  Impressions: <b>3,714</b>	Clicks: <b>18</b>  Reach: <b>1,011</b>	N/A (post-launch)	N/A	No. of views of news article: <b>2,502</b>

post-consultation)					Total visits to Guide page: <b>11,317</b>
<u>20 July</u> <b>Blog, Brendan Connell-French:</b> <i>Time is running out: have your say on our initial proposals for new constituencies</i>	Clicks: <b>56</b> Impressions: <b>8,610</b>	Clicks: <b>13</b> Reach: <b>2,022</b>	Data not available	N/A	<b>749</b>
<u>2 July</u> <b>Blog, Glenn Reed:</b> <i>2023 Boundary Review: Have you submitted your feedback yet?</i>	Clicks: <b>28</b> Impressions: <b>2,887</b>	Clicks: <b>21</b> Reach: <b>1,850</b>	<b>419</b>	N/A	<b>506</b>
<u>25 June</u> <b>Blog, Mark Balfour:</b> <i>Behind the scenes at the Boundary Commission</i>	Clicks: <b>36</b> Impressions: <b>2,888</b>	Clicks: <b>17</b> Reach: <b>1,565</b>	Data not available	N/A	<b>77</b>
<u>8 June</u> <b>Blog, Tim Bowden:</b> <i>Help us draw the line to make parliamentary constituencies more equal</i>	Clicks: <b>54</b> Impressions: <b>9,502</b>	Clicks: <b>54</b> Reach: <b>8,030</b>	<b>650</b>	N/A	<b>790</b>
<u>8 June</u> <b>News piece:</b> <i>Initial proposals for the 2023 Boundary Review now published</i>	Clicks: <b>208</b> Impressions: <b>10,910</b>	Data not available	Data not available	N/A	<b>23,243</b>
<u>2 June</u> <b>Blog, Colin Byrne:</b> <i>Constituency boundaries are changing: help us draw the line</i>	Clicks: <b>135</b> (combined total for social media) Impressions (Twitter): <b>10,569</b> Reach (Facebook): <b>1619</b>		N/A (before launch)	N/A	<b>460</b>

\*All page visit data taken from 'Page' rather than 'Page Title' figures.

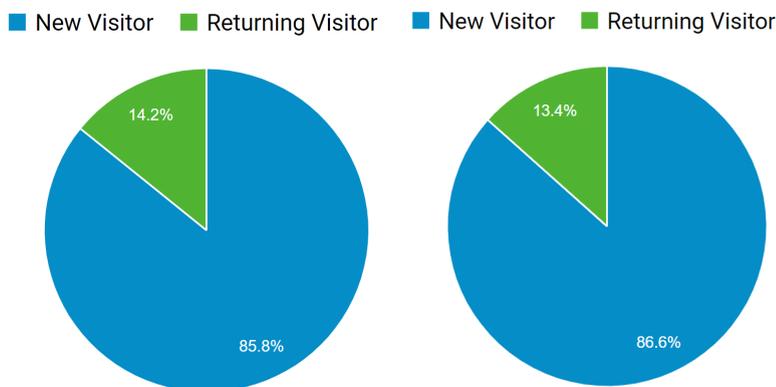
50. From the data available, we can see that the promotion of blogs through social media followed broadly the same pattern of engagement as previously seen - a peak at the launch of the consultation, followed a drop in the number of clicks for a period of time before levels of engagement from the public with BCE content again rises towards the end of the campaign - helped by language which pushed the urgency of submitting views before the deadline. While the results are variable, the number of link clicks on the bcereviews.org.uk address through blog webpages does suggest that as a free supplement to paid-for advertising, blogs should not be discounted as a method of driving members of the public to the consultation portal.

51. During the campaign, as during the previous review, we used Google Analytics to monitor the use of our corporate website, [boundarycommissionforengland.independent.gov.uk](https://boundarycommissionforengland.independent.gov.uk) and consultation portal, [bcereviews.org.uk](https://bcereviews.org.uk).

52. Between 8 June and 2 August 2021, there were 306,436 sessions on our consultation portal, including visits from 242,911 new users, and 698,235 page views. Of the total number of sessions, 68,083 were on the first day of the consultation and 126,314 in the first week. The bounce rate (referring to visitors who view only a single webpage on the site before exiting) across the consultation period was 35.08%, which is a good result - according to one study, the bounce rate across various industries falls within the range of 55% to 68% (orbitmedia.com).

53. During the last review, we were able to compare data on audience acquisition from Google Analytics - the websites, including social media channels, which page visitors arrived from most frequently. However, this metric is no longer accurate due to changes in the way websites can track data. Our cookie consent mechanisms ask permission to submit anonymous activity data, and as most visitors decline, we cannot track media attribution as accurately as before.

54. Our corporate website and consultation portal received almost exactly the same share of new and returning visitors across the campaign period. A high proportion of new visitors is an encouraging sign in terms of reach; on the other hand, the share of returning visitors may also indicate that members of the public often returned another time before deciding to make a representation.



*bcereviews.org.uk, left; boundarycommissionforengland.independent.gov.uk, right*

55. Our corporate website received 47,254 page sessions on 8 June, with pages viewed 120,067 times - showing that when visitors arrived at the site, many did not view just the homepage but explored further. We had a bounce rate of 41.82% which, although higher, still falls below the average for websites. Over the first week, the portal was visited 67,538 times; across the full consultation period, the corporate website received a third of visits garnered by the consultation portal at a total of 106,703.

56. Our top ten most viewed pages on the corporate website were:

	<b>Page</b>	<b>Total visits</b>	<b>% of total visits</b>
1.	The 2023 Review tab, linked on the homepage of the consultation portal	68,351	25.26%
2.	The corporate website homepage	37,145	13.72%
3.	News release on 8 June, <i>Initial proposals for the 2023 Boundary Review now published</i>	23,243	8.59%
4.	South East materials	12,807	4.73%
5.	North West materials	11,668	4.31%
6.	Guide to the 2023 Review	11,317	4.18%
7.	London materials	11,239	4.15%
8.	South West materials	7,734	2.86%
9.	East Midlands materials	6,579	2.43%
10.	Yorkshire and the Humber materials	6,317	2.33%

57. As the table above shows, our most viewed webpage was not the homepage but the 2023 Review section, with a quarter of total visits. This indicates that many visitors to our corporate website were directed there from the homepage of the consultation portal, via a link which directs the public to the list of text reports and pdf maps on the website.

58. Our top ten most viewed pages on the consultation portal were as follows:

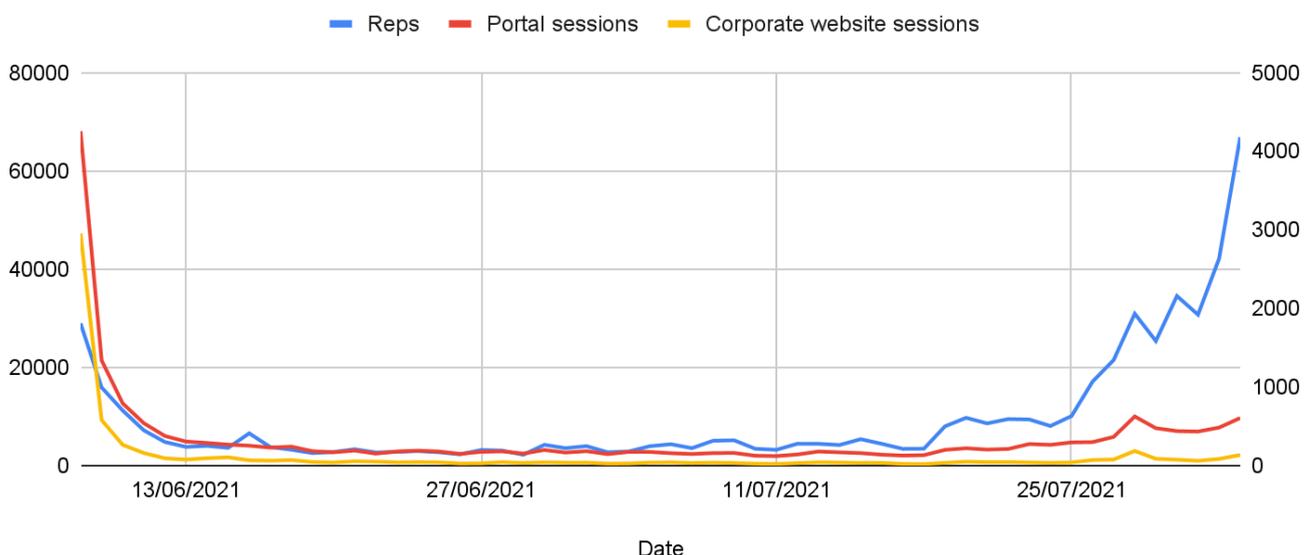
	<b>Page</b>	<b>Total visits</b>	<b>% of total visits</b>
1.	The portal homepage	160,889	23.04%
2.	Our proposals for South East	50,427	7.22%
3.	Our proposals for North West	46,493	6.66%
4.	Our proposals for London	36,881	5.28%
5.	Our proposals for South West	29,609	4.24%
6.	Our proposals for East Midlands	28,181	4.04%
7.	Our proposals for Eastern	26,050	3.73%
8.	Our proposals for West Midlands	24,811	3.55%
9.	Our proposals for Yorkshire and the	22,713	3.25%

	Humber		
10.	Our proposals for North East	15,625	2.24%

59. There is a significant correlation here with the amount of coverage published per region (see the table in 2.2.1 above). Again, the South East and North West, which received the majority of coverage per region, also received the most visitors to the pages for those regions on the consultation portal.

60. The line graph below compares the number of sessions on bcereviews.org.uk per day with the corporate website (left y axis), and with the number of representations made per day (right y axis).

Representations made, portal sessions and corporate website sessions



61. The impact of the BBC East Midlands interview on 28 July is again shown in the noticeable peak in all three metrics on the right of the graph, demonstrating the importance of obtaining coverage.

### 3.2.3. Lessons learned

62. It is recommended that we continue to build and improve on our social media presence, producing content regularly and making sure to connect with relevant accounts to try and get our posts spread more widely. Instagram received low engagement, and has very few followers, while Twitter and Facebook seem to be much better platforms for our organic content. By distributing content at frequent and regular intervals, we become more favoured by the sites' algorithms. In future, we should try posting even more frequently to see if this further increases engagement - with the caveat that we should not oversaturate followers' feeds with our posts and

receive the opposite effect. The 'look' of our posts have improved with the use of design software, and accessibility should continue to be a key consideration. We must keep up to date with any improvements in accessibility tools and best practices.

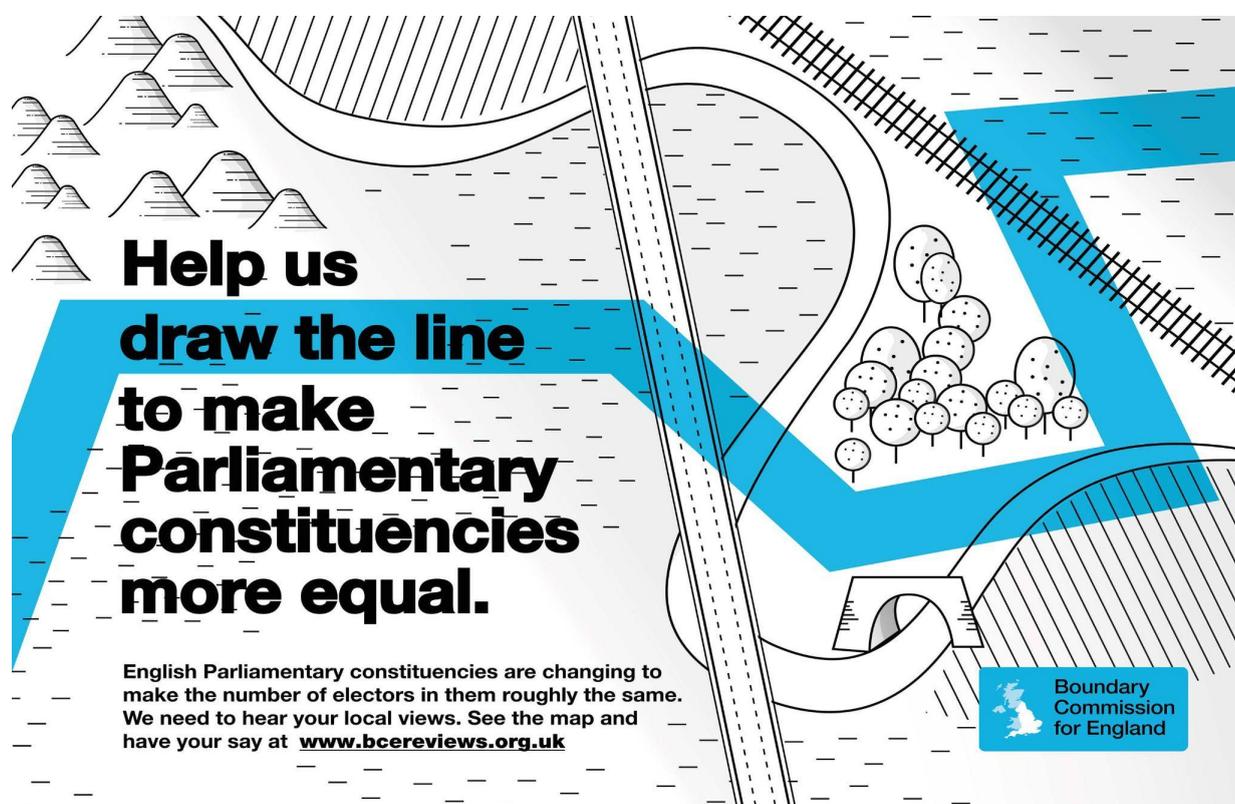
63. While not previously used by the Commission, Google's URL campaign builder and the Bitly website are both free tools which should continue to be used to gather data in cases where it would otherwise not be sufficiently gathered by in-built metrics on Google Analytics, WordPress or on social media platforms. While it takes time and forethought to implement - several individual bitly links must be created to capture data from each platform for one link - it gives valuable insights.

## 4. Print and online advertising

### 4.1 What we did

#### 64. Print insertions

We placed the below half-page advert in the following 11 national newspapers on 8 June to launch the campaign with the maximum impact possible: Daily Mirror, Daily Star, Daily Express, Evening standard, Metro, Daily Mail, I Newspaper, Daily Telegraph, Guardian, Sun, and The Times. During the previous review, we ran adverts in 7 newspapers, again only on the first day of the consultation.



**Help us  
draw the line  
to make  
Parliamentary  
constituencies  
more equal.**

English Parliamentary constituencies are changing to make the number of electors in them roughly the same. We need to hear your local views. See the map and have your say at [www.bcereviews.org.uk](http://www.bcereviews.org.uk)

Boundary Commission for England

Print ad



*Print ad in the Metro newspaper*

65. Paid search

Through OMD, we ran a paid campaign on the search engines Google and Bing. Based on their advice, we selected a range of keywords which would deliver the web address [bcereviews.org.uk](http://bcereviews.org.uk) in the search results to any person using those terms. The website would appear as the top result, helping to drive traffic to the portal. The budget for this section of the campaign was split into 'exact match' and 'broad match', to capture a wider range of results.

66. Digital Display

We placed our campaign video and moving digital banner adverts on a range of main news websites (e.g. Telegraph, Guardian, Reach) through the advertising network Ozone. This was judged to give us access to a broad audience, as well as ensure we advertise on brand-safe websites. Banner adverts were used to retarget those who had watched the video to drive home the message. In a first for the Boundary Commission, we also advertised on the streaming platform Spotify.

67. Social

On OMD's advice, we used Facebook, the leading social network in the UK, as the main platform for our social adverts; the company owns Instagram, and so the adverts appeared on this site as well. We used both a 15 second campaign video and four static image adverts, which were swapped in and out depending on which worked best.

## 4.2 Evaluation

### 4.2.1 Outputs

68. We decided to run half-page print adverts instead of full-page adverts in order to get the best value for money for our campaign. All ran in either the front or middle third of the newspapers, therefore giving our ad the best chance for grabbing the reader's attention. In a few newspapers, the ad featured alongside or nearby an article about the review, making the advert more memorable; however, most ran their news coverage about the Review on 8 June in the online edition.

	<b>Circulation</b>	<b>Front third</b>	<b>Middle third</b>	<b>Back third</b>	<b>News coverage on 8 June?</b>
<b>Metro London</b>	504,226		X		No
<b>Daily Telegraph</b>	264,422	X			Online coverage
<b>I</b>	151,761		X		No
<b>Daily Mail</b>	994,081	X			Online coverage
<b>Times</b>	276,063	X			Online coverage
<b>Sun</b>	1,033,275	X			No
<b>Daily Star</b>	237,266	X			No
<b>Daily Mirror</b>	388,718	X			Online coverage
<b>Guardian</b>	109,533		X		Print and online coverage
<b>Daily Express</b>	251,736	X			Print coverage - page 11 alongside ad - and online
<b>Evening Standard</b>	550,000		X		Print coverage - page 2 - and online

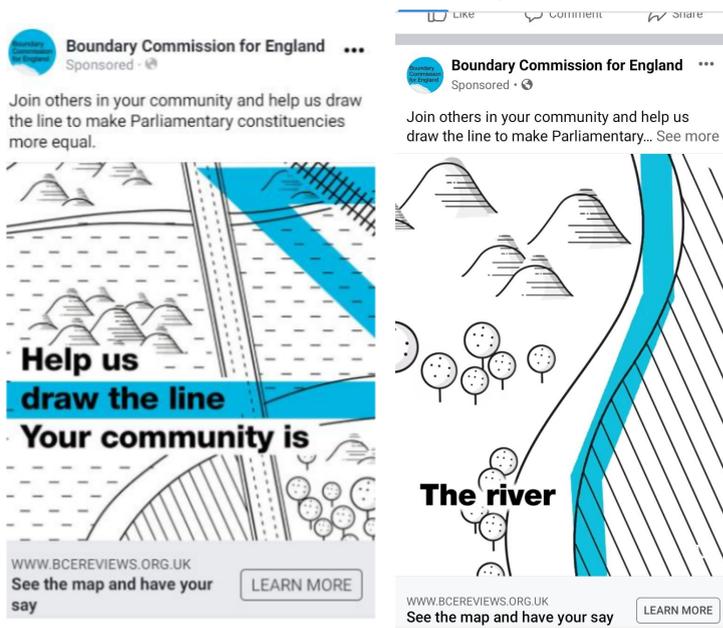
69. The creative for our online advertising was developed by Engine over the course of several meetings with the Secretary, Head of Corporate Services and the Communications Manager to create the best look and message for the campaign.

70. We decided to keep the striking blue graphic line which already features prominently in the Commission's branding, and pair it with a visually engaging image of a map with features people would associate with their own local area - a bridge, a wood etc. The adverts were based around the idea that through the campaign, we are asking

the public 'to help us draw the line' and give their views. As well as a 15 second campaign video, a variety of static adverts were created, each with a different variation on the campaign messaging. The slogans were:

1. It's your local area
2. Help us draw the line / Your community is
3. Local knowledge wanted
4. Help us draw the line / You've got til Aug 2nd

71. These messages were chosen to appeal to people's sense that they have valuable local insights, and to drive home the message that by sharing them, they can help to make sure that their constituency boundaries best reflect their community.



Static advert no.2 as it appeared on Facebook, left; screenshot of the campaign video, right

## 4.2.2. Impact

72. Although it is difficult to accurately evaluate the impact of our print adverts, from the circulation figures above we can calculate an expected total circulation of 4,761,081. As part of the comment submission form on the portal, we included an optional question to ask respondents where they had heard of the review (see paragraph 82 below). 'National newspaper' was chosen as an option by a small proportion of the total respondents (841 people), compared to Facebook (11,944 people).

73. In order to allow us to evaluate our reach with underrepresented audiences online, we split our targeted audiences where possible into three groups: BAME, 16-44, and 45+. We impressed upon OMD the importance of advertising to groups based in England only.

#### 74. Social

Adverts were distributed across Facebook and Instagram feeds and stories. 'Clicks' is the most important objective here, as it represents the number of times users were successfully driven to the consultation portal after viewing and then clicking on an advert - totalling approximately 170,800 clicks overall.

	Clicks	Clickthrough rate (CTR)	Cost per click (CPC)	Views	Impressions	View through rate (VTR)
<b>FB/IG</b>	170,814	0.64%	£0.44	679,880	26,801,438	5.9%
<b>Benchmark*</b>	43,423	0.26%	£1.73	383,246	16,604,620	5%

\*Our benchmarks were set by OMD, and based on the expectations set by other government campaigns and current industry standards.

75. A further look into the levels of engagement from the separate targeted audiences is shown here:

Phase	Audiences	Clicks	CTR	CPC	Impressions
<b>Video views</b>	<b>16-44</b>	10,808	0.14%	£2.02	7,516,800
	<b>Adults 45+</b>	7,905	0.34%	£0.99	2,343,516
	<b>BAME</b>	2,840	0.17%	£1.72	1,720,688
<b>Traffic</b>	<b>16-44</b>	47,499	0.56%	£0.46	8,434,708
	<b>Adults 45+</b>	74,244	1.94%	£0.15	3,820,534
	<b>BAME</b>	13,659	1.24%	£0.21	1,098,742
	<b>Retargeting of Video Viewers</b>	13,824	0.74%	£0.34	1,865,001

76. The estimated or benchmark click through rates (CTR) for video views and traffic were 0.1% and 0.4% respectively, which our campaign outperformed. We believe this was due to the strength of the adverts, since the more engaging a creative is, the level of engagement will be. The static adverts did extremely well in the BAME and 45+ audiences, performing well above the planned CTR and providing a very low cost per click.

77. The advert with the highest CTR by far (1.48%) was static no.2, which carried the message, 'Help us draw the line / Your community is'. The advert using the encouragement of a strong deadline also performed well, as expected, with a CTR of 0.95%. During the campaign, we held meetings every two weeks with OMD to

monitor the impact of the adverts and make adjustments as needed. Since we produced several different static images, we were able to monitor which adverts performed the best and withdraw underperforming adverts during the campaign to make sure that we were getting the best value for money.

#### 78. Digital Display

While not as high performing as our social media adverts, our online biddable advertising distributed through Ozone and Spotify did manage to create an impact. Through Ozone, our adverts reached a total of 511k people at an average frequency of 6 times. We received slightly fewer impressions than expected, but achieved over 3.3k clicks on the adverts, at a click through rate of 1%, which surpassed the benchmarks for these metrics.

Traffic	Clicks	CTR	Views	VTR	CPV	Impressions
<b>Ozone</b>	3,338	0.1%	360,973	23%	£0.10	3,169,280
<b>Benchmark</b>	2,529	0.06%	312,500	20%	£0.11	3,173,325

79. Ozone were able to identify the content with which those who engaged with the campaign were also interested in (for example, it was possible to track the number of people who clicked on a banner ad from the finance page of a news website). The key area was unsurprisingly news and politics; however, other areas which Ozone also identified were automotive, family and relationships, careers, and personal finance.

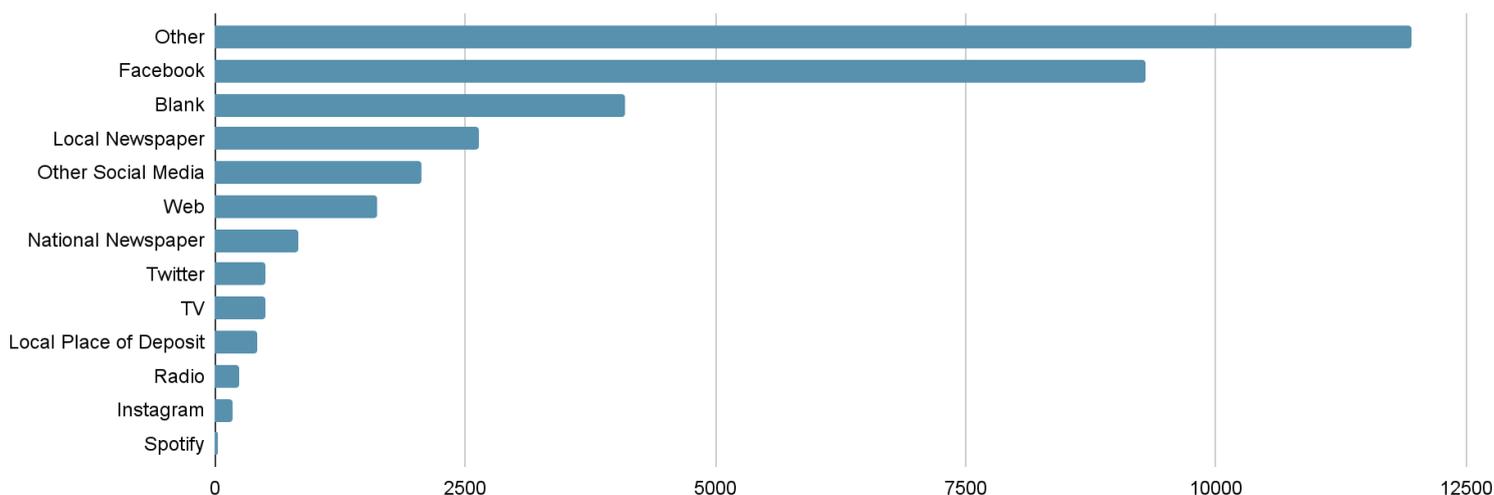
80. Our Spotify advertising campaign was delivered to users as non-skippable images with sound which would only appear when the app was open and in focus. By clicking on the advert, the public would be taken to the bcereviews.org.uk website. There was a much higher click through rate when it was served on laptops (0.77%) as opposed to mobiles (0.16%), and so during the campaign a greater share of the budget was spent on the former. The adverts reached 598k unique spotify users, at an average frequency of 3 times. While the number of clicks (approximately 10k, exceeding the benchmark of around 4.1k) was again lower than social media, using Spotify allowed us to key into a younger audience. We saw the highest engagement (63%) from users aged 45+, as occurred across the board during the campaign, but unusually this was followed by users aged between 16 and 24 (59%). However, the number of respondents answering 'Spotify' to our survey, which asked where those making a representation had heard of the Boundary Review, was low.

#### 81. Search

Search, again, did not perform as well as social, but it did achieve a higher number of clicks than digital display at a lower budget overall; however, display nonetheless reached a higher number of people. We were advised to try using Bing as well as Google to reach an older audience who use the default search engine on their devices. However, it was greatly outperformed by Google in terms of engagement, with a very high cost per click, and during the campaign we decided to stop running adverts on Bing to focus our budget on Google.



## Rep submission survey on bcereviews.org.uk: where did you hear of the review?



### 4.2.3. Lessons learned

84. Social media was the best performing platform for our online advertising campaign by far, achieving a wide reach and driving a good number of people to the consultation portal. We should consider this to be our main advertising platform during the rest of the 2023 Boundary Review, and consider increasing its share of the assigned budget.
85. However, it is important to still have an advertising presence on platforms other than social media, in order to reach members of the public who do not use it. It is [largely for this reason that when the paid search campaign was not performing as expected towards the end of the campaign, we did not choose to end our advertising on this platform completely but to divert only a portion of its budget to the social media section.
86. The use of print advertising is expensive, but did give us guaranteed coverage on launch day in widely circulated newspapers we otherwise would not have had a presence in - for example, The Sun, which did not run any coverage. Running the adverts on launch day also meant we began the campaign with the maximum amount of both organic and paid-for content possible, thus providing the strongest impact on the public.
87. Digital display reached a wide number of people, but without translating this into a high number of clicks, especially in relation to the cost of the campaign; conversely, the paid search campaign delivered a better click through rate even though its reach was lower. It is recommended that we use Google only, not Bing, as the search engine for the paid adverts as the performance of this metric was much improved once we paused the delivery of adverts on the latter. This campaign was the first time

that we had tried advertising on Spotify. As the video only served when the app was open and in focus (and not when, for example, a person's phone was locked), we could consider in the future whether a different format would lead to higher engagement. While it did not lead to a high number of clicks, it did lead to a high proportion of engagement with our advert among a younger demographic.

## 5. Stakeholders

### 5.1 What we did

88. We worked to build on our relationships with stakeholders, beginning in earnest from May 2021. The Secretary and Communications Manager reached out to the Local Government Association (LGA), Association of Electoral Administrators (AEA) and National Association of Local Councils (NALC) and organised meetings with representatives. These meetings gave us an opportunity to introduce the role of the Commission and the Review, and to give an outline of the process going forward. We knew that they could help us to drill down as locally as possible our key messages for the campaign, and wanted to ensure these organisations were aware and on board from the beginning. All were very positive and offered the use of their various channels. On 8 June, we sent out to the AEA, NALC, and LGA a 'partner pack' of useful resources to make raising awareness of the review as easy as possible. This was also sent to Electoral Registration Officers and Chief Executives of local authorities in our email launching the review on this date.

### 5.2. Evaluation

#### 5.2.1. Outputs

89. During the previous review, the partner pack was produced by a creative agency; this time, it was created in-house by the Communications Manager, constituting a great saving. The pack included: our key messages; links to our social media channels; sample posts for social media, including the campaign graphics; sample text for websites and bulletins; a poster; press release; blog post; fact sheet; and finally a list of frequently asked questions to help answer constituents' queries about the 2023 Review.

90. Two Review Officers or corporate staff attended all nine of the regional branch AEA meetings throughout June to give a brief, introductory talk about the work of the Commission and to raise awareness about the consultation. This also gave the opportunity for attendees to ask questions about the process.

91. We distributed content via the weekly bulletins of the AEA, NALC and LGA at the beginning of the campaign, and again towards the end to encourage submissions.

We sent content to the AEA so that they could build a section of their website dedicated to the review. A blog from the Secretary was featured in the LGA's *first* magazine. A short text was also distributed in their e-bulletin to around 20,000 people - mostly councillors in England and Wales.

## 5.2.2. Impact

92. Use of the partner pack seems to have been at a good level. Bitly links were used to monitor the number of times the partner pack was downloaded to track interest in this resource. A link to the pack was included in the launch day emails to Electoral Registration Officers and Chief Executives, which was very well received - reaching 1,445 total downloads. It was also downloaded 189 times from the website, where it is included in the '2023 Review' section.
93. The ready-made social media posts were distributed by a large number of councils on their social media channels throughout the consultation, helping to raise awareness of the review among the followers in these local areas. [Here](#) is a tweet posted by Carlisle Council as an example.
94. We gathered feedback from stakeholders about the partner pack, via a survey asking for comments from the Electoral Registration Officers, Chief Executives, AEA, NALC and LGA. We received 42 responses to our survey - a small sample size, but one which nonetheless offers some insight into how the pack was used. The key takeaways from this survey are:
- All those who received the partner pack thought the information was clear and understandable
  - The most-used resource was the sample text for websites and bulletins (57%), followed by the press release (38%) and the sample social media posts (38%)
  - Almost all respondents thought that the pack was sent to them in a timely fashion. The feedback to our survey was very positive, with respondents commenting that the partner pack 'looked professional and saved time', 'provided a useful source of information', and 'it was great to have a resource to refer to for key messages'.

## 5.2.3. Lessons learned

95. Having regular contact with stakeholders meant that opportunities to distribute communications about the review were identified as they arose. A partner pack should again be produced for the second consultation and distributed through our stakeholder list, as this was received positively. For the next consultation, we should get in touch a few weeks before the launch date to trail the release of materials, including the partner pack, as a few councils felt that they would have liked more warning. We should also send the link around again as a reminder once the campaign is underway. During the first consultation, text was placed in the bulletins of the AEA, NALC and LGA at the beginning and towards the end; we should place a 'halfway through' promotion as well. We should also continue to engage with these

organisations outside of the consultation periods - for example, being available to present during any national conference an organisation may arrange.

# Annexes

## A) Excerpts from radio interviews

### Topic: Cost of the review

*Review Manager on BBC Bristol*

The interviewer twice mentions the cost of the review: “Does it cost lots of money to change boundaries?”

RM: “This current review is going to cost in the region of 2.5 million. That is a lot of money, but the constituencies we currently have in place are based on electorates from over 20 years ago, and sooner or later we’re going to have to change the constituencies, because our population changed throughout the country and our current constituencies are way out of kilter. This is a process of rebalancing to make sure that every constituency has roughly the same number of electors, to make sure that each vote carries roughly equal weight.”

### Topic: Impact on political parties: impartiality

*Secretary on BBC Berkshire*

Interviewer: “...it will have such an impact on the outcome of elections. If you shift some places in and some places out, that could actually change the result. I realise that’s not what you’re all about, but these are big decisions that you’re making. You could be creating seats that are safer for conservatives or labour, or more likely to change hands.”

Secretary: “The Commission is an independent and impartial organisation, that’s in the fabric of its DNA itself. We’re only interested in making sure that every constituency has between the 69-77k figures, ensuring that those constituencies represent community ties, and who is elected from any of our new pattern of constituencies is obviously a matter for the voters.”

### Topic: Making difficult decisions

*Review Manager on BBC Radio Gloucestershire*

Interviewer: “Do you accept that you’re never going to please everyone? The reality is that whatever happens, there’s going to be a fallout to this.”

RM: “Absolutely, it isn’t possible to conduct a review like this, with such major change, that it’s going to please everybody, we fully accept that. There will be some people who will be quite supportive of the changes, others not, what we want to do is provide the platform to hear those views, which is why I strongly urge people to go to our website and let your views be known to us. In previous reviews, what people have said to us has meant there have been revisions. Every representation is considered and in the previous review more than half of the constituencies in England were altered due to what we received from the public.”

Interviewer: “That’s true, I remember, to be absolutely fair to you, that did happen and there were major changes.”

[...] The interviewer suggests a constituency name from a caller in a 'tongue-in-cheek' question.

RM: "I think that's a very valid point indeed. Names do mean a lot to people. Again, that's what this consultation is about. If we get the name wrong, we want to hear from people with suggestions of what you think the name should be, and those are things we will consider very earnestly."

Radio and TV interview coverage was largely very balanced. Where interviews were preceded by commentary with a negative slant, our spokespeople's participation in interviews allowed them to reassure audiences and provide balance. For example, in one programme, BBC East Midlands Today had travelled to the current constituency of Erewash to cover the local MP's opposition to the proposed name change. This was interspersed with clips of the Secretary to the Commission's interview - thus assuring the audience that an avenue existed to have their voices heard on the proposed change.

#### *Secretary on BBC East Midlands Today*

Presenter plays a clip from Maggie Throup, MP for Erewash: "...Huge chunks of my constituency are missed out if the name gets changed."

Presenter, voice-over behind clip of BCE website: "Anyone can go online and check the Boundary Commission proposals. They say people's comments will count."

Cuts to a pre-recorded interview with the Secretary: "Actually members of the public are best placed to tell us if we've got that right for you and your local area. We want to hear from as many people as we can between now and 2 August."

We can consider almost all of the interview coverage we received to be very effective as staff were proficient at managing to include the key messages for the campaign in their answers, and steering conversations back on track after challenging questions. This was not achieved in all cases. In the sole instance where coverage proved less effective, editing by the station led to only a short clip of the Deputy Secretary being included in their bulletin, and without reference to the consultation. Much of the available airtime during the bulletin was instead given to the G7 summit.

#### *Deputy Secretary on Greatest Hits Norfolk & North Suffolk*

Presenter: "Now, the East of England may get three extra MPs, following a new proposal to rebalance the voting system. The Boundary Commission, which oversees UK constituencies, wants there to be a similar number of voters in each area to make the system fairer. Suffolk and Essex could find themselves sharing a cross-border constituency if redrawn plans go ahead. Tony Bellringer, the General Secretary [sic], says voters in areas where there are more people will end up with less voting power."

Cuts to a pre-recorded clip of the Deputy Secretary: "[...] It's actually tough on the electors themselves, because the MP is a finite resource, they have a more limited access if that MP has to be spread around 100,000 of them rather than 50,000 of them. It's wholly unfair and quite against the principle of representative democracy."

## B) Partner pack

Images of the partner pack pages are included below. To download the pack as a pdf from our website, please click [here](#).



### 2023 Review of Parliamentary Constituencies

#### Partner Guide

June 2021



# Contents

Introduction

About the review

Key messages

How to get involved

Resources

FAQ

# Introduction

## Dear partner,

We'd like your help to promote a public consultation on new Parliamentary constituency boundaries in England.

On 8 June 2021 we published our initial proposals for new constituencies. These proposals will increase the overall number of constituencies in England and make them more equal in terms of the numbers of electors each contains. We have commenced an eight week consultation period, where we want people to tell us whether they agree with the proposed changes, ensuring those responses capture the views and knowledge of local residents.

We need your help to spread the message that it's easy for people to get involved and that all views genuinely count. Members of the public can view our proposals and share feedback on our online consultation portal, [www.bcereviews.org.uk](http://www.bcereviews.org.uk). We will consider every piece of feedback that we receive.

There will be a further two rounds of consultation in 2022, which will additionally include a number of public hearings. Following the conclusion of all three consultation periods, the Commission will look at all the evidence received and form its final recommendations. These will be presented to Parliament by July 2023 for approval, with the new constituencies taking effect at the next General Election.

Please get involved and help your local communities have their say!

You will find a number of resources outlined within this guide to help you with this.

# About the review

The 2023 Review of Parliamentary constituencies was formally launched in January 2021. Due to population changes since the last review, the number of electors in some constituencies is much higher than in others. The Commission is required by legislation to ensure that the number of electors in each constituency is more equal; in doing so, the number of constituencies in England will increase from 533 to 543. We published the initial proposals – the first time people get a look at what the map of constituencies might look like – on 8 June 2021. This launched an initial eight week consultation, ending on 2 August 2021.

## How people can get involved

We want to ensure the final recommendations reflect the views and knowledge of local residents and communities. It is easy for the public to have their say. By visiting our online consultation portal, [www.bcereviews.org.uk](http://www.bcereviews.org.uk), you can:

- View the map of proposed constituencies
- Provide feedback on the new boundary lines
- Share your views on proposed new constituency names

Any constituents who are unable to get online can view the initial proposals for new constituency boundaries at local places of deposit, and submit responses to us by letter or email.

## Contact information for partners

If you wish to get in touch with us at any time, you can:

- Email [information@boundarycommissionengland.gov.uk](mailto:information@boundarycommissionengland.gov.uk) or call 020 7276 1102 for general enquiries
- Email [press@boundarycommissionengland.gov.uk](mailto:press@boundarycommissionengland.gov.uk) or call 07821 637558 for press enquiries
- Write to us at: Boundary Commission for England, 35 Great Smith Street, London, SW1P 3BQ

## Key messages

**Fair and impartial**  
Boundary Commission for England is an independent and impartial public body.

**We want to hear your views**  
The Boundary Commission for England want to hear from local residents and communities, to make sure their final recommendations to Parliament take account of local views and knowledge.

**It's easy to have your say**  
View and comment on the proposed changes online at [www.bcereviews.org.uk](http://www.bcereviews.org.uk)

**Critical part of our democracy**  
Reviewing constituency boundaries is an essential process to make sure that individual votes are of broadly equal weight.

# How to get involved

We want to raise awareness of the Review, and encourage as many people as possible to have their say on the proposed new boundaries. Feel free to use any or all of the tools and resources in this guide to help share the message.

- Follow us on social media and regularly update your organisation's social media platforms. We have provided some suggested copy and graphics for you to use on your channels.
- Link to the consultation website [www.bcereviews.org.uk](http://www.bcereviews.org.uk) (where people can view and comment on the proposed changes) from your organisation's website or your internal and external bulletins/newsletters.
- Distribute the campaign materials at your venues and events. We also encourage you to share the message far and wide within your networks, including arm's-length management organisations, housing associations, community groups and your internal staff. We have provided graphics for a poster that you can use.
- Send a press notice to local media encouraging others to share their views.
- Blog about it. We have included a sample blog if you want to carry one from us, or you could write your own.



# Resources: Social media

Follow us on social media to hear key updates about the 2023 Boundary Review. We encourage you to regularly share our posts to help raise awareness of the Review. We want to reach as many people as possible.

We have provided some suggested copy and graphics for you to create your own social media posts if you wish. Feel free to tweak our copy to come up with the best approach for your audience.



[www.facebook.com/BCEReviews](https://www.facebook.com/BCEReviews)



[twitter.com/BCEReviews](https://twitter.com/BCEReviews) or [@BCEReviews](https://twitter.com/BCEReviews)

Use **#helpdrawtheline** and tag us **@BCEReviews** on Facebook or Twitter - we look forward to seeing your posts!



# Resources: Social media

Download these campaign graphics from the link below to share as images on social media and make your posts more visually appealing. We have suggested some messaging to help you with this, but please feel free to come up with the best approach for your audience.

Download images for Facebook here [🔗](#) and for Twitter here. [🔗](#)



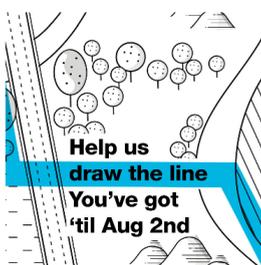
Constituencies are changing. Help shape the boundaries for your area at [www.bcereviews.org.uk](http://www.bcereviews.org.uk) and follow @BCEReviews



@BCEReviews is redrawing constituencies to make the number of electors in them more equal. Share your views here [www.bcereviews.org.uk](http://www.bcereviews.org.uk)



@BCEReviews needs your local knowledge to help shape new constituency boundaries. #helpdrawtheline at [www.bcereviews.org.uk](http://www.bcereviews.org.uk)



There's still time to have your say on proposed boundary changes for your area. Go to [www.bcereviews.org.uk](http://www.bcereviews.org.uk) to #helpdrawtheline

# Resources: Sample messages for websites, bulletins

Please link to our online consultation portal [www.bcereviews.org.uk](http://www.bcereviews.org.uk) (where people can view and comment on the proposed changes) on your organisation's website and in any newsletters or bulletins.

## Text for your website

Did you know that Parliamentary constituencies are set to change? The independent Boundary Commission for England (BCE) are drawing the map of constituencies in England and needs your help to shape their final recommendations, ensuring they take into consideration local knowledge and views.

From 8 June until 2 August 2021 the BCE are holding an eight week consultation, allowing you to share your knowledge about your local area. The Commission considers every piece of feedback that it receives, whether that is about where the constituency boundaries should be or the name of the constituency.

It is easy to get involved - To view interactive maps showing the proposed changes, and to submit your feedback, go to [www.bcereviews.org.uk](http://www.bcereviews.org.uk).

## Text for your newsletter or bulletin

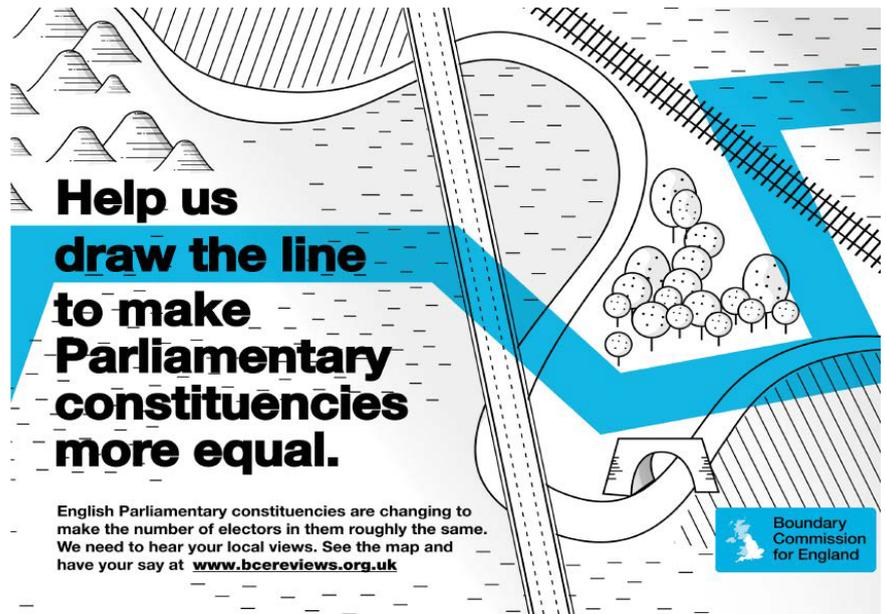
The independent Boundary Commission for England (BCE) are redrawing the map of Parliamentary constituency boundaries. The changes will make the number of electors in each constituency more equal, thus ensuring individual votes are of broadly equal weight, and in doing so increase the number of constituencies from 533 to 543. Go online at [www.bcereviews.org.uk](http://www.bcereviews.org.uk) to view and comment on the proposals. Don't miss out – contribute your local knowledge and have your say on what the new constituencies should be by 2 August 2021.



# Resources: Poster

Download an informative A4 poster to upload to your website or distribute through your channels.

Download here



# Resources:



## Press notice

You could consider sending a press notice to local media, encouraging others to share their views. You can find a template press notice on the BCE website or use the link below.

Download our press notice here: 

## Blog post

The Secretary to the Boundary Commission for England, Tim Bowden, has written a blog which you can share through your channels. This blog must be published under his name.

Download our blog post here: 

## Fact sheet

We have made a helpful fact sheet leaflet with essential information about the review. It can be easily printed - it fits on the back and front of a sheet of A4 paper - and given to anyone who is interested in learning more.

Download our fact sheet here: 



# FAQ

## **Why are you reviewing constituency boundaries?**

We have been asked by Parliament to review constituencies in England to ensure that there is a more even distribution of electors across them. Due to population changes since the last review, the number of electors in some constituencies is much higher than in others. The 2023 Boundary Review, which was launched in January this year, will make the number of electors in each constituency more equal, thus ensuring individual votes are of broadly equal weight. In making these required changes, the number of constituencies in England must increase from 533 to 543.

## **How do you work out the proposed changes to boundaries?**

The Parliamentary Constituencies Act 2020 requires the Commission to base this review on electorate data from 2 March 2020. According to the UK's electorate figures published on 5 January 2021 by the Office for National Statistics, each constituency that we recommend must contain no less than 69,724 Parliamentary electors, and no more than 77,062 (except two 'protected' constituencies for the Isle of Wight). This is essentially the mean average number of electors for each constituency. England will be allocated 543 constituencies for the new review, which constitutes an increase of ten constituencies.

## **Will my MP or constituency be affected by the boundary changes?**

The number of constituencies in England will increase from 533 to 543, and each will need to have a similar number of electors. To implement these requirements, there will be wide scale change to the majority of constituencies. View the proposals online at [www.bcereviews.org.uk](http://www.bcereviews.org.uk) for your particular area to find out more.

## **When would the proposed changes take effect?**

The Boundary Commission will make its final recommendations to Parliament by 1 July 2023. The Government must turn the recommendations of the BCE (and those of the equivalent Commissions for the other three parts of the UK) into an 'Order in Council' that implements the recommendations. The constituencies set out in the Order will then be implemented for the next General Election after the date on which the legislation is approved.

## **Will this review favour one political party over another?**

The Boundary Commission for England is independent and impartial and will not take into account patterns of voting or the results of elections when reviewing constituency boundaries. Nor do the political parties' views on where boundaries should be have any more weight than those of members of the public.

## **How long will the review last?**

Initial proposals are published on 8 June 2021, with final recommendations submitted to Parliament in the summer of 2023.

## **Why do you need my views?**

14 We want to make sure that the final recommendations have taken local views and knowledge into consideration.

**How can I share my views?**

You can visit [www.bcereviews.org.uk](http://www.bcereviews.org.uk) to view the proposed map of constituencies and share your views.

**Will the changes affect my local council services, bin collections or schools, for example?**

No. The boundary changes only relate to Parliamentary constituencies (the area an MP is elected to represent in Parliament). Services and council tax in your local area are set by your local authority and this review does not change local authority boundaries.

**When will the new constituencies take effect?**

After the final report from all four Parliamentary Boundary Commissions has been laid by the Speaker, the Government is required to submit to the Privy Council an Order that gives effect to all four Commissions' recommendations. After the Privy Council approves the Order, the new constituencies take effect at the next General Election. Any by-elections held in the meantime have to be held on the basis of the old (existing) constituencies.

**Will the name of my constituency change following the review?**

Possibly. As well as looking at where the boundaries of constituencies should be, the BCE will recommend a specific name for each constituency. Generally, the more a constituency has changed, the more likely it is that the BCE will recommend a change of name. The Commission welcomes views on the naming of proposed constituencies during the consultation.