



BCE/2022/2nd meeting

BOUNDARY COMMISSION FOR ENGLAND

Notice of meeting

The presence of Commissioners is requested at a meeting to be held at 9.30am on 6 June 2022. 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. Public hearing evaluation (est 25 minutes) **Paper 2** (WT)
4. Communications evaluation (est 25 minutes) **Paper 3** (EI)
5. 2023 Review update (est 30 minutes) **Paper 4** (TBe)
6. Working towards the revised proposals (est 10 minutes) **Paper 5** (TBo)
7. Any other business

Close (12.15pm)

Tim Bowden
Secretary to the Commission

Minutes of the sixth meeting of 2021 of the Boundary Commission for England, held on 22 November 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
Communications Manager
Business Support Officer

1. Welcome and minutes of the last meeting

- 1.1 Commissioners agreed the minutes of 14 September 2021 meeting, subject to changes for accuracy and grammatical purposes.

2. Paper 1: Review Programme Update

- 2.1 Mr Bowden noted the updates made to the timetable.
- 2.2 Mr Bowden noted the updates made to the risk register, which now includes COVID-19 as a separate specific risk, particularly given the likely timetable for Public Hearings.
- 2.3 Mr Bowden noted the Machinery of Government (MOG) changes, the Secretariat will officially move to the Department for Levelling Up, Housing and Communities (DLUHC) in early December.
- 2.4 Mr Bowden noted that the current plan includes the Commission remaining at its current accommodation of 35 Great Smith Street. Members of the Secretariat will also retain separate Boundary Commission for England email addresses.
- 2.5 Mr Bowden noted that the Secretariat continues to follow Cabinet Office policy in regards to Covid-19 guidelines and hybrid working.

3. Paper 2: Secondary Consultation Preparations

- 3.1 The Deputy Secretary noted the ongoing work by the Review Team in preparation to publish responses from the Initial Consultation.
- 3.2 Commissioners agreed to publish the responses two weeks before the launch date of the Secondary Consultation.

4. Paper 3: Public Hearings Update

- 4.1 The Head of Corporate Services presented the Paper and provided Commissioners with an update on Public Hearings.
- 4.1 Based on legal advice received, Commissioners agreed not to hold hybrid public hearings.
- 4.2 Commissioners agreed to increase the number of Public Hearing from thirty to thirty-two.
- 4.3 Commissioners agreed to publish a consolidated video recording of the hearing after the hearing had been concluded. Commissioners proposed the recording should be made available as soon as possible after the hearing has ended.. Commissioners agreed on this approach instead of livestreaming the public hearings.
- 4.4 Mr Bowden outlined that guidance on public hearings would be circulated to Commissioners for agreement. Subsequently this guidance would be published.

5. Paper 4: Equality Impact Assessment

- 5.1 The Head of Corporate Services presented the updated Equality Impact Assessment (EIA) to the Commissioners.
- 5.2 Commissioners provided comments on the updated EIA. Commissioner Sarah Hamilton suggested that when the consolidated video recordings of Public Hearings are published online, these should include captions. The Secretariat will investigate this.

6. Communications Campaign Evaluation

- 6.1 The Communications Manager gave a presentation regarding the Communications campaign during the Initial Consultation.
- 6.2 Having reflected on the initial consultation, the Communications Manager gave recommendations for the communications campaign for the Secondary Consultation.
- 6.3 Commissioner Colin Byrne noted that radio advertising had not been used during the communications campaign. The Communications Manager noted that advertisements on the streaming service had replaced this. Mr Bowden noted the communications budget available for the 2023 Review was not sufficient to undertake radio advertising.
- 6.4 Commissioner Colin Byrne noted the significant effort which has been made to communicate the Commissions message during the initial consultation.

7. Any other business

- 7.1 Mr Bowden noted that the Commission is required to provide an update to the Speaker of the House of Commons in January 2022 on the progress of the 2023 Review. Mr Bowden will provide a draft to the Commissioners for their consideration.
- 7.2 Mr Bowden updated that it is expected that the annual meeting of the UK Boundary Commissions is likely to take place in January 2022.

Minutes of the first meeting of 2022 of the Boundary Commission for England, held on 6 January 2022

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
Communications Manager

1. Public hearings

- 1.1. Commissioners considered the latest published data on the Covid-19 pandemic. The Commission agreed that based on the latest position on Covid-19 in England, the secondary consultation (during which the public hearings are held) should go ahead as planned between 22 February and 4 April 2022.
- 1.2. Commissioners agreed that a number of measures needed to be put in place to ensure the welfare of staff and those attending. These included, the provision of lateral flow tests for staff, encouraging mask wearing, staff risk assessments, guidance for the public and contingency planning arrangements.
- 1.3. It was agreed that guidance for the public hearings would be circulated for agreement by correspondence.
- 1.4. Commissioners agreed to advertise and open up the speaking slots for the public hearings, during the week commencing 17 January 2022.

BCE/2022/2nd meeting/Paper 2

Public hearings evaluation

Introduction

1. Section 5(4)(c) of the 'Act' (as amended), requires public hearings to be held during the secondary consultation period. Schedule 2A to the Act makes more detailed provision for these public hearings, but leaves a number of matters within the discretion of each Boundary Commission and those who chair the public hearings.
2. The public hearings form a critical part of the Review, and unlike past reviews, when they were held during the initial consultation, this was the first occasion they have formed part of the secondary consultation. They are an important part of the process, particularly as they, allow the public to have their say in person about the new proposed map of constituencies. For the 2023 Review, the Commission conducted 32 two-day public hearings across the nine English Regions between 24 February and 1 April during the secondary consultation period (which ran from 22 February to 4 April).
3. This paper provides a review and lessons learnt of the delivery of the public hearings taking into account a number of different perspectives, including feedback received from the political parties, MPs, members of the public, and the Assistant Commissioners, as well as the direct experience of the secretariat staff. Where appropriate, the paper makes a number of recommendations for the delivery of future public hearings at the next review.
4. This review covers nine key areas:
 - a. planning of the public hearings
 - b. communications
 - c. number of hearings
 - d. timings and booking systems (oral representations)
 - e. locations and venues including crate distribution
 - f. lead hearings
 - g. assistant commissioners
 - h. staffing and administration
 - i. transcriptions
 - j. Covid-19

Overview

5. From the onset, the Commission became aware that the delivery of the public hearings for the 2023 Review was going to be a mammoth task, given the challenge of the Covid-19 pandemic and continually changing restrictions. By the time the concrete plans for delivering the hearing were in place, the country was emerging from lockdown restrictions. The challenge of delivering the hearings

was also compounded by the unexpected Machinery of Government change in September 2021, with the changes implemented in December, which meant a new sponsor department, along with new internal procedures and policies.

6. Despite these challenges, the delivery of the 2023 Review public hearings went well and was on the whole deemed to be successful from an administrative point of view, with very good feedback received during and after the hearings from a number of Assistant Commissioners, politicians, the main political parties, and members of the public. In addition to this, 85% of the respondents to our survey said that the hearings were well organised, with accessible venues, and found Assistant Commissioners and staff friendly and helpful. There were, however, a small number of complaints from the public, and a couple of politicians, about the location, communications and administration of the hearings but this would represent a very small proportion of those who attended the events and responded to the survey.
7. The communication of the public hearings were as successful as can be expected, given that we did not have a specific advertising budget which focused solely on the public hearings. Furthermore, the war in Ukraine overshadowed the launch of the secondary consultation and the start of public hearings. But despite this, we had a wide range of regional coverage. We heard from 1116 speakers at this review which compares to 1184 speakers at the last review. While we'd of course want to hear from more people, we consider this is a good number of attendees, particularly when considering the context that the hearings were taking place in the circumstances of the Covid-19 pandemic.
8. As at previous reviews, some hearings had a low turnout. The lowest number of speakers was recorded at Dorchester (13) for both days, with the highest being recorded in London, with 74 speakers. In addition, a further 217 people attended public hearings without speaking. Again, given the challenges of the pandemic, the attendance was much higher than anticipated.

Planning and preparation

9. The planning for the public hearings started immediately after the meeting with the political parties in November 2020 and subsequent meetings between the Commission and the secretariat. This was at the height of the Covid restrictions which meant that the only actual concrete plan in place was the recruitment of the Assistant Commissioners. The general planning of timescales and venues had begun in September 2021 following the conclusion of the consultation on the initiative
10. Although the lessons learnt from the 2018 Review made the planning relatively easier, there was however a significant amount of 'new' planning and preparation work to undertake, including the possibility of the delivery of virtual or hybrid hearings, delivering the hearings in a safe environment that allow people to have them in person, and taking into account the safety of the secretariat staff and

the Commissioners/ ACs. This was further complicated by the challenge of the Machinery of Government (MOG) change which happened in the middle of the procurement of the venues, hotels and the AV providers.

11. Taking on the lesson learnt from the 2018 Review, the Commission sought the services of the Government Recruitment Service (GRS) to deliver the first part of the AC recruitment to the sift stage. The Commission received 217 applications for the 18 positions. The cost was relative, in comparison to employing the services of an external agency or the secretariat staff running this exercise with limited staff. It was also extremely helpful, as GRS took the administrative burden of running this exercise in house, which ensured that staff were able to focus their attention on other urgent matters. On the whole the recruitment of Assistant Commissioners went relatively smoothly.
12. As already mentioned, the hearings were held during the secondary consultation, therefore the decisions on the locations could not be made until after the conclusion of the initial proposal in August and a significant proportion of representations having been processed. In addition to this, there was also a strong possibility that the increase in the rate of Covid infections would certainly affect our ability to deliver in-person hearing as stipulated in the 'Act'. The Commission had to investigate and sought legal advice on our proposed new plans for delivering virtual hearings, alongside the in-person hearings.
13. This meant that the locations for the hearings were not confirmed until the Commission meeting in September 2021. The sourcing of suitable venues became a challenge, as local authorities' venues and third sector venues were still closed to the public and unable to take or hold the bookings, due to the Covid restrictions which were still in place.
14. This activity could not commence in earnest until October when the restrictions were eased, even then the Secretary to the Commission has to personally email some Local Authority Chief Executives with the request to make their buildings available for the hearings. While the work on sourcing the venues was then conducted efficiently, nonetheless in a number of cases the secretariat was unable to secure council or third sector buildings for five of the venues, which were our preferred options in terms of suitability in every location. The reason for this was those venues were unwilling to commit to holding a hearing due to the pandemic. Given the potential risk this presented, it was therefore necessary source alternative venues, such as hotels. Of the 32 venues, 27 were held at local authority or third sector venues, this was a massive improvement on the last review which held 19 (of the 36) at these type of venues.
15. The administration of travel for staff was a huge improvement on the last review. Lessons learnt ensured that travel for each location was initially mapped out for all staff ahead of booking tickets, which ensured that staff travelling to and from the same location were booked on the same trains. In addition to this, the Cabinet Office's rail provider Trainline System was easy to use and the tickets were booked efficiently.

16. Taking the lessons learnt from the last review, the Commission engaged with CTM, the Cabinet Office's official supplier of hotel rooms, whose services we had to use to book hotels recommended by us. Although this made the operation easier this time round, the administration process still fell on the Corporate Team who were already stretched to find suitable hotels closer to the venues, as well as processing the confirmations and any other amendments. Unlike at the last review when we had to pay for unused rooms, the early engagement with CTM meant that we had constant flow of communications, and any unused rooms were cancelled and unsuitable hotels were changed at no cost to BCE. For example a couple of staff had to pull out of the hearings due to Covid, the rooms were cancelled at no costs. In addition to this, we were able to include the Commissioners, ACs and AV providers in the bookings which allowed for consistency and value for money
17. A challenge the team also faced was finding suitable hotels that were within walking distance to the venues and could accommodate on average five staff for 2/3 nights, especially for those out of town locations, namely Northallerton, Crawley and Portsmouth. In Crawley, the team had to stay 2.1 miles away from the venue with no links to public transport. In Portsmouth however, we had to pay over the Cabinet Office's upper limit per night as we had no other alternative accommodation, particularly at the hearing that was taking place in the hotel.
18. As at the last review, the secretariat had to find and make the initial booking with all the venues, and before passing the list on to the Cabinet Office's official venue and conference finders Calder with whom we worked before, to confirm the bookings. This in itself was a challenge as it introduced a third party responsible for the booking, but not the arrangements at the venue.
19. We had to also change some of the locations, as there were difficulties in finding appropriate venues, (e.g. Havering, Merton and Eltham were changed from Hornchurch, Tooting and Eltham) and there was also the issue of those venues whose preference was not to deal with a third party like Calder, which the secretariat had to take responsibility for.
20. The pandemic introduced an extra layer into the process. A majority of the local authority venues who in the past were able to provide in house catering were unable to provide this service. This created an additional layer, as the team had to work with these companies via Calder to ensure these services were delivered. Although there was a significant to-ing and fro-ing between us, the venues, the caterers and Calder, the corporate team could not have delivered the venues and catering without the service of Calder.
21. The most significant lesson learnt from the practical administration of booking the hearing venues, accommodation and travel, is engaging earlier with the Sponsor Department's central and prescribed agencies for such services. Although they increased the administrative burden on the team, they were able to create the flexibility be it the cancellation of hotel rooms or in Calder's case they managed

all the contracts on behalf of the Commission and the venues and caterers. In addition to this, the Secretary should also engage with the chief executives of the local authorities as soon as the locations are confirmed. The Commission was fortunate for this review, to have the generosity of seven local authorities who let us use their venues free of charge. Of the seven local authorities, four of the venues at no cost at all to the Commission, and paying for additional staffing and security costs after 5pm at the remaining three.

22. Given the success at the last review of having the hearing video and audio recorded, with the recordings sent to be transcribed, it was agreed that we follow the same process again. Unfortunately the process of procuring the AV provider was very difficult due to the MOG, which created a huge delay in the process. This resulted in us having limited time available between finally having the go ahead from the Cabinet Office and the hearings commencing meant that the procurement of the transcription service for the hearings was done in two stages. Stage one the procurement of the AV provider was more rushed than we would have wished. Fortunately working with the Crown Commercial Service, we were able to identify a suitable AV provider and procure them speedily.
23. Given the complications of the MOG and pressure on the corporate team (particularly to deliver the public hearings) the Secretary decided to delay the second stage of the procurement – transcribing the audio recordings until after the hearings had finished. The procurement of this service is now underway. A key reason for this separation was to ensure any procurement processed now needed to follow DLUHC policies and procedures, which at the time were new to the secretariat.
24. Finally, in terms of staff, unfortunately lessons were not learnt, even though this was a key recommendation from the last review – staffing numbers in the Corporate Team reduced from seven (including the use of temporary staff) down to three at this review. During the busiest period (between October and February) of the delivery of the hearings, the team could have definitely benefited from additional staff. There were a variety of components of the hearings including all of the above and managing the impact of the MOG and the pandemic that had to be delivered in an extremely tight timeframe. While some of these were covered by the Review Officers, this involved members of the Corporate Team diverting their time away from work to bring the Review Officers up to speed.

25. In light of the above experience, the secretariat recommends:

- a. That the recruitment of the ACs should commence immediately after the launch of the review. The Commission should also outsource the first stage of the recruitment to the Government Recruitment Service (GRS) who specialises in the recruitment of senior staff. It is extremely important that the Commission also has an open line of communications with the Cabinet Office's Public Appointments Team and the Sponsor Department's ALB Team throughout the recruitment process to ensure that it has the most up to date

policies on public appointments.

- b. That, although plans cannot be made for all possibilities like MOG changes, pandemics etc., the Commission should engage immediately with the relevant chief executives of the local authorities to ensure that council buildings are secured. In addition to this, an earlier meeting with any central venue booking organisation (e.g. Calder in this experience) should take place immediately after the decision is made on the locations of hearings to ensure that bookings are secured.
- c. Similarly, an early meeting with the central travel/accommodation company (e.g. CTM) should happen immediately after agreement of venues, to ensure that necessary arrangements for booking hotels includes the Commissioners, ACs and the AV providers.
- d. Similar concerns apply to the process of procuring the video and transcription services for the hearings. Given the importance of this to the review, and the limited number of companies equipped to fulfil our requirements, as well as the time constraints involved, early engagement with CCS and the Sponsor Department's Procurement Team should commence immediately. It should remain a key requirement that the companies must have experience of recording public hearings.
- e. The role of the business manager should be kept as lead public hearing co-ordinator in future, but the post holder must be experienced in the provision of leadership support on a range of business management and operational areas. That role should have a larger team to provide support, particularly on the AC recruitment and booking of the travel and all the other administrative processes in the lead up to and throughout the hearing period. The corporate team should be appointed immediately before the official start of the review, to ensure that they are embedded within the Commission.

Communications (advertising the public hearings)

26. As already mentioned earlier, the Commission did not have a specific advertising budget for promoting the public hearings. A press officer was appointed during the initial proposal was in place to increase the promotion of the public hearings and respond to media requests for interviews. The main promotion of the specific locations and dates of public hearings were publicised through press release, stakeholder packs, the BCE website, our consultation webpage, Facebook page, and via Twitter (other general promotional activity focused on directing people to our consultation website). Anecdotal feedback indicates that there was limited awareness of the review, and specifically of the public hearings amongst the general public. I.e. Preston.

27. The secretariat therefore recommends:

- a. The Commission continues with its strategy for targeted localised media

promotion. Take advantage of the increasing use of technology.

28. Number of hearings

29. Schedule 2A of the Act requires the Commission to convene at least two hearings and no more than five in each of the English regions. During this review the Commission decided to hold 32 hearings, a reduction of four on previous reviews. Commissioners will be aware, that originally when considering hybrid hearings it was minded to convene fewer hearings. It is noted that despite holding four fewer hearings at this review the number of attendees was nearly the same as at the previous review.
30. Some anecdotal feedback was received at some hearings at the 'surprise' of holding certain hearings. The limited feedback on this point in the survey suggests that more hearings should be convened i.e. in every town, although the suggestion would not be permissible under the legislation.
31. While it was suitable to convene 32 hearings for this review, the secretariat considers a reduction in the total number of hearings should be considered for future reviews. This, though, should be considered in the context of having the ability to hold hybrid hearings, and continuing to ensure hearings reflect the issues raised during the initial consultation.

The booking system and timings

32. At the meetings with the political parties in November 2021 and the subsequent meeting with the Commissioners, it was agreed that making the opportunity for people to speak outside of normal working hours, to give flexibility, was the right approach. As a result the hearings were scheduled from 10am – 8pm on day one and 9am – 5pm on day two.
33. It was noted that for the majority of the locations day one (including the lead hearing) was well attended at 53%, against 46% on day two. It is worth noting that the Fridays of day two attracted more speakers (316), than day two on Tuesdays (187). It is difficult to say why the difference is, but the reason might be because MPs and interested parties are in their constituencies on Fridays. However, even though overall day two was less well-attended, in the interest of accessibility, we would still recommend continuing to run two-day hearings.
34. As at the last review, a pre-booking system was set up online via Eventbrite for members of the public to book a 10 minutes speaking/ presentation slots in advance of the hearing. The booking facility was advertised on all our publication materials as mentioned above about the hearings. The pre-booking system for a hearing closed on the day before the hearing, but it remained possible for individuals to attend and request to speak on the day, subject to the Chair's agreement. Whilst this did allow time for 'walk-in' speakers to be accommodated, it also often resulted in large gaps opening up in the timetable in many places.

35. With regard to the evening sessions, while the principle was felt to be right, in order to accommodate full-time workers, the late afternoon and evening sessions were the least attended. It was also felt that the day did end up being a very long one, both for the Assistant Commissioners who were required to concentrate for the whole day on what was being said, and also for the secretariat and support staff, who began setting up the venue from 8am. In addition, there was also cost implication, as some of the venues charged a higher rate after 5pm and some of the free council venues charged additional staffing costs.
36. Managing the booking service this time was much more effective, although there were some individuals who claimed to have used the online booking system, and subsequently attended a hearing, but we could find no record of their booking. However, on the positive side, 63% of respondents to our survey found the booking system easy to use, whilst approximately 1,200 (this number is higher than actually those who spoke, as some people double booked slots or cancelled as they isolating having tested positive for Covid-19) people successfully used the online system to register to speak.
37. Finally, Assistant Commissioners varied their approach to closing the hearings early. In one case at Gloucester Day Two, the hearing was closed around 4.30pm, and an attendee arrived just after 4.40pm hoping to make a representation. Although this situation was handled and no reputational damage was done, there is a significant risk of such damage if hearings are closed unreasonably early.

38. The secretariat therefore recommends:

- a. Speakers other than qualifying parties at a lead hearing should be allocated a ten minutes slot, but should also be advised at the point of registration that they should expect to be called to speak 'at some point within their allocated time', and that they should aim to speak for no longer than ten minutes (although this can be extended). This allows for greater flexibility, whilst retaining a reasonably strong degree of clarity about when an individual will be speaking;
- b. If the hearings remain two days in length, perhaps the first day should either start after lunchtime and finish at 8pm, or run 9am-5pm then have a window 7pm-8pm to accommodate speakers unable to attend during the day on an exceptional basis. An alternative, would be to divide each day into three two hour sections, morning, afternoon and evening.
- c. A more radical consideration could be to continue with the lead hearings running for two days and non-lead hearings each running for a single day. This would provide for some cost savings but is likely to present some logistical challenges.
- d. Turnout to the hearings, overall remains low, and it is difficult to say why. However, the pandemic has highlighted the need for updating the 'Act' to

allow for speakers to be able to make oral representations virtually. As it stands the 'Act' allows only for oral representations to be made 'in person' which perhaps resulted in the low attendance at the hearings. We also had a query asking if there was a facility to enable them to make their representation virtually. The way meetings and hearings are delivered has change, and with the increase in use of technology, we strongly recommend that the 'Act' be amended ahead of the next review, to include a virtual element alongside the in person public hearings. Another thought to this, is that most people have submitted their written representation and do not wish to attend the hearings.

- e. Subject to decisions on opening hours and running time above, stronger guidance should be given (including mandating if necessary) on the minimum opening hours;
- f. The facility to make a booking request via a website should remain, given the relative popularity of this facility, but a longer period should be allowed for proper defining, implementing and testing before the system goes live.

Locations and venue suitability

- 39. Following lessons learnt from the last review on the suitability for venues for the public hearings the Commission opted to use mainly local authority venues, with third sector venues and hotel conference rooms used when it was impossible to secure a council building. 95% of the venues used were local authority buildings. They are generally, centrally located,, and are usually known to local people. They were above all cheaper, and in some cases free to use. Unlike at the last review, technology has improved so much that there were little or no issues with wifi connections. In addition to this, Commission staff were able to connect to the wifi on their phones.
- 40. The private sector and third sector venues chosen were in the main generally more customer-focused and had staff readily available to help at all times, with generally more modern facilities, but they were on the whole extremely expensive. I.e. Central Hall in Westminster at £17.5k in comparison to the most expensive local authority building Liverpool at just under 5K.
- 41. Careful consideration was also taken to ensure that most of the venues for the hearing were centrally located, better served by public transport and easily accessible. There were, however, a few exceptions like Crawley which was located 2.4 miles away from the railway station, although it was served by a local bus.
- 42. Unlike in 2018, the locations for the hearings were selected based on the emerging issues from the initial proposal, and the likely controversy in that area. However, it was still important to ensure venues were well connected on public transport and had suitable facilities required as part of the delivery of the hearings, for example, overnight accommodation.

43. The secretariat therefore recommends:

- a. Locations should continue to be selected on the basis of accessibility within – and a reasonably even spread across a region, based on the likely controversy in an area. However this will depend on whether this information is available to the commission.
- b. A specific venue within an area should only be booked if it can be confirmed that there is reasonably good accessibility to it by public transport (preferably multiple types and routes);
- c. That given the need for value for money, local authority venues should be selected by default over private sector conferencing venues or third sector organisations, but individual venue booking should rely primarily on the specific site visit by the Corporate Team to check its suitability;
- d. Finally we propose the 95% of the locations used for this review be considered at the next review (subject to the issues raised during the consultation) - the secretariat has kept full records for the next review of which locations were suitable and which were not.

Lead hearings

44. The principle of holding a lead hearing in each region seems to have remained a success, as the Assistant Commissioners seemed to find it helpful to receive an overall picture from the qualifying political parties. Having gained a good understanding of these at the beginning of the lead hearing, they were then able to check the extent to which subsequent individual speakers throughout a region were expressing support for the counter-proposals of one of the main parties.
45. The lead hearings also seemed to attract the most attendance - 40% of the speakers were at the lead hearings, and therefore seemed to be successful in having provided a focus for that, even if that did not then seem to generate much in the way of momentum for subsequent hearings in the region.
46. The secretariat therefore recommends:
 - a. continuing with the same practice for lead hearings at future reviews.

Assistant Commissioners

47. Feedback from members of the public at the hearings (and the respondents to our survey) and staff on how effectively the Assistant Commissioners chaired the hearings has been generally positive, as regards their independence (whilst remaining willing to consult and listen to advice from secretariat staff), efficiency, courtesy, and seeking to put nervous individuals at ease.
48. Staff noted earlier in the hearing that there was some inconsistency with the

closing statements at the end of each hearing. But this was quickly corrected with a standardised closing statement.

49. The secretariat therefore recommends:

- b. That the induction training for Assistant Commissioners should continue to contain a dedicated element for the lead Assistant Commissioners, on dealing with the need for consistency in the application of the guidelines.

Staffing and administration

- 50. The administration of the hearings on the whole was deemed a success by colleagues, ACs and some members of the public. The daily conference call between the secretariat, to share issues, solutions, good practice, and general information about what was happening elsewhere proved to be very useful. It was also used as a morale booster and check the wellbeing of staff – given that staff were still worried about Covid.
- 51. As at the last review, having the press officer at the lead hearings was also a success. They were able to handle media briefing/ queries as and when necessary.
- 52. At the start of the hearings, the proposed standard secretariat ‘team’ for a hearing was four: one lead official to support the Assistant Commissioner directly throughout, (and be the lead representative of the Commission itself for media etc.); the relevant review officer for the region as a technical expert on the proposals in the region (and drive the maps during the proceedings); and two admin support staff to run the registration desk, handle ad hoc administrative and logistical issues. Generally, more staff were present at lead hearings. Given the Covid infection rate was still high, and it was highly likely that some of the Commission staff may catch Covid-19 during the course of the hearings, the secretariat put in place contingency arrangements with Homes England (via the assistance of the sponsor team in DLUHC) who would step in at short notice.
- 53. Nevertheless, when we had a couple of staff down with Covid, the staff found ways to run the hearings with as little as three members of staff - while this would present a risk in terms of resilience, it did demonstrate that hearings could be run with limited staff..
- 54. It was essential to have a member of the business team with overall responsibility for the couriering of all materials, such as the stationery boxes, along with the boards and banners, in order that they arrived at their destinations in advance of the hearing. However, due to the team being committed to other duties, this role was delegated to two review officers. While a majority of the crates were collected and delivered on time, there were however, a couple of instances when this was not the case. For example, the Deputy Secretary had to collect the crate, banner and board from Crawley by car and drove them to the next hearing in Reading.

55. The secretariat therefore recommends:

- a. A standard staff team for a hearing (including a lead hearing) should be four, consisting of one senior manager (that may be the Secretary to the Commission at the Lead Hearings only), the relevant review officer or manager for that region, and two admin support staff;
- b. But despite this, overall the logistical arrangements for delivery of the materials worked very well, so should be adopted again. Although, we cannot plan for miscommunications between the central post room at the Cabinet Office and the couriers, for the next review, however the review team should carry spare copies of the A0 map, the guide and a handful of the summaries for that region as a backup to the hearing location.

Transcriptions

56. The use video and audio recordings of the hearings has been a success in terms of transparency and organisation. The recordings will be transcribed and published alongside the audio and video recordings. The video and audio recordings of the hearings were delivered at the end of each day of the hearing. Although this worked well at 99.9% of hearings, we did however, encounter an unfortunate incident on day two of the hearing at Ealing Hearing. The AV engineer did not manage to capture the audio recordings for the last 10mins for the day, which meant that we were not able to capture the oral evidence for two speakers. The two speakers were informed of this and were able to submit a written representation if they wished. One of the speakers impacted by this mistake mentioned this in his response to our survey. As a backup, the AV provider amended its setup to ensure this mistake did not happen again.
57. A new aspect of this review was uploading the recording to the Commission YouTube channel as soon as possible at the end of each hearing day. This was achieved relatively successfully, and subject to how hearings are conducted in the future, it should be normal practice at future reviews.
58. The Commission has a legal obligation to take a 'record' of the hearings - due consideration should be given at the next review as to the best way of doing so. While the current arrangements worked well, given the pace of technology it may be the case that a more cost-effective way of taking a record can be found at the next review.

Covid-19

59. While the challenge of Covid-19 has been covered throughout this paper it would be remiss not to reflect specifically on it and the measures the Commission put in place to ensure the welfare of staff and those who attended. These measures included daily testing, provision of masks, and encouraging social distancing. It is noted that it was difficult to get these measures right given changes to restrictions

pre-hearings and during the hearing period. Overall, the secretariat considers the measures put in place were correct and proportionate.

60. Some of the measures were only achievable with the support of the Sponsor Department, for example ensuring sufficient lateral flow tests were available to allow for a programme of daily testing. Its fair that those who attended the hearing welcomed the measures in place, were respectful, and pleased they had choices as individuals.
61. Clearly, it's not possible to predict future pandemics. In the event that hearings needed to be held in similar circumstances, the secretariat would suggest early engagement with the Sponsor Department to ensure it supports the Commission in putting in place any necessary welfare measures.

Conclusions

62. Taking into consideration the challenge we faced with the Machinery of Government Change, overall, the running of the hearings for the 2023 Review has been a qualified success. We received very little criticism about the administration, conduct or purpose of the hearings. In addition to the aforementioned, given that the country England had just come out of lockdown, and the Covid infection rates were still high, I would concluded that the hearings were generally well, with good use of technology to improve elements such as booking and administration, and presentations on the day.
63. The overall staffing split between the Review Team and the Corporate Team must be reviewed, as the administrative burden placed on three staff was significant, and will not be feasible in future. Thought should be given to increasing the staffing complement specifically dedicated to the recruitment and management of Assistant Commissioners and the booking and running of public hearings at the next review.
64. Assuming the Commission remains sponsored by the DHULC at the next review, it should continue to use its central procurements and contract arrangements on elements such as hotel, travel and venue booking, as the current relationship since the MOG has greatly improved. In addition, the new delegated finance status that has been given to the Secretary to the Commission will also in future ensure simplification of the process.

BCE/2022/2nd meeting/Paper 3

Communications evaluation - secondary consultation

Overview of communications activities

1. A secondary consultation was held by the Boundary Commission for England between 22 February and 4 April on the 2023 Boundary Review, and a communications campaign took place to publicise this public consultation and encourage participation.
2. This paper provides a comprehensive overview of the communications activities undertaken by the Commission in the lead up to and during the secondary consultation period. This paper also evaluates the performance of each communications activity, and provides recommendations for the future strategy ahead of the revised proposals consultation.
3. During the secondary consultation campaign, the Commission undertook the following communication activities:

Paid-for advertising

- Conducted an advertising campaign on Facebook and Instagram using campaign graphics and video, which when clicked would direct people to the consultation website
- Placed video adverts on the streaming platform Spotify directing users to the consultation website
- Advertised the consultation website via Google, with adverts appearing when specified or related search terms were entered by users

Organic communications

(i.e. free or created 'in-house')

- Created event pages for each public hearing via Eventbrite, allowing the public to register to speak at a hearing, and collated these with other information on a dedicated public hearings webpage
- Prepared guidance for the public on what to expect at public hearings, and a step-by-step guide to using the event booking system Eventbrite to register
- Published engaging content on social media accounts at regular intervals
- Produced blogs from the Secretariat and Assistant Commissioners on the Commission website, and published them via social media
- Conducted a survey gathering feedback on the hearings from attendees
- Made available all public hearing videos on the BCE YouTube channel

Media

- Circulated a press release to all media contacts on the launch of the consultation, followed by targeted regional press releases with a staggered distribution date before the launch of each lead hearing
- Participated in radio interviews and provided written statements on invitation
- Monitored, recorded and evaluated coverage of the Review

Stakeholders

- Distributed a 'Partner pack' of resources to aid local authorities and stakeholder organisations in publicising the consultation
- Conducted a survey to gather feedback from local authorities after the consultation on the partner pack as a resource
- Built relationships with stakeholders and organised content to be included in email newsletters and placed on websites
- Presented information on the Commission and the upcoming consultation at the AEA national conference in January 2022

Overview of recommendations

4. The following recommendations are based on the campaign evaluation set out in this report. Below is a brief summary of the recommendations which are laid out in full in the final section, and will also be explained in detail at the meeting.
5. The third consultation will be held over four weeks as set out by legislation, allowing a significantly shorter period for submitting representations on the revised proposals for new constituencies. However, with a higher budget available for the final consultation, the Commission will use paid-for advertising and other communications activities to raise awareness widely and drive as many members of the public to the consultation website as possible during this period.
6. Social media (Facebook and Instagram) reached a wide audience and should again receive a significant portion of the budget. We will also run print advertising which, while expensive, is expected to reach a wide audience through national newspapers. Alongside this, the Commission expects to run a digital display campaign using Ozone, which distributes adverts via news sites online, and the streaming platform Spotify; a search terms campaign on Google will also help to draw in people searching around the boundary review online.

7. If available, spare resources should be used to refresh the adverts distributed by the Commission with some new images, via a creative agency. Other possible optimisations include using Instagram purely for younger audiences, and reaching older audiences on Facebook as this may be more cost-effective to reach more widely - this will be explored further with OMD. We will also look into activities such as a sponsored session on Spotify, which is expected to lead to higher engagement.
8. The Commission will continue to build relationships with stakeholders and engage in activities to build its profile, including attending Civil Service Live in July. The partner pack was successful in encouraging local authorities to raise awareness among the public at a local level, and an updated version should be produced for the final consultation.

Communications campaign evaluation report

Secondary consultation

1. Introduction

1. The Boundary Commission for England is required by Parliament to undertake an independent and impartial review of all parliamentary constituencies in England, to rebalance the number of electors in each constituency. Initial proposals for new constituency boundaries were published by the Commission on 8 June 2021, and an eight week consultation was launched receiving over 34,000 responses from the public to the proposals. The Commission published all the representations received on 7 February and afterwards invited views on them during a secondary consultation, which was held over a four week period as set out by law. During the secondary consultation, which took place between 22 February and 4 April 2022, 32 public hearings were conducted across the country facilitating the opportunity to comment on the initial boundary proposals in person. Targeted communications activities were undertaken by the Commission in order to raise awareness of the 2023 Boundary Review, and to encourage members of the public to have their say via the consultation website, letter, email, or at a hearing.

1.1 Objectives

2. The aim of the communications campaign conducted by the Commission throughout the secondary consultation was to:
 - **Engage** with the public; encouraging as many people as possible to view the initial proposals and provide their responses in writing via the consultation portal, letter, or email, or by speaking at a public hearing; moreover, enable stakeholders such as local authorities and MPs to raise awareness of the review and provide audiences with clear 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 and stakeholders 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.

1.2 Key messages

3. As during the first consultation, the following key messages underlined all communications activities.
 - **Have your say:** Your local insight and knowledge can affect the boundaries being reviewed, and we consider every piece of feedback that is received. This is your chance to tell us whether or not you support our proposals, and if you can propose an alternative.
 - **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.

1.3 Strategy

4. While planning, we accepted that the campaign for the secondary consultation would be a more complex proposition, particularly in terms of gaining media coverage. The large volume of regional and national news articles published during the first consultation was due to the fact that it was the first time the proposed new map of English constituencies could be seen. The Commission therefore needed to plan carefully in order to increase the ‘newsworthiness’ of the secondary consultation, which constituted the second time that members of the public were invited to comment on constituencies initially proposed last summer.
5. As well as driving people towards the consultation website bcereviews.org.uk as before, the campaign also needed to make people aware of the opportunity to attend a public hearing by booking a slot via the Boundary Commission for England website. We therefore complemented the paid-for advertising with a strong organic campaign on our own channels and included clear calls to action on targeted regional news releases directing the public to hearings in their area. We decided against using a portion of the advertising budget to place paid-for adverts online for the public hearings, chiefly to ensure that the main aim of the campaign, to drive people towards the consultation website, remained clear.
6. While the budget for the secondary consultation was lower than that available during the first consultation campaign, our strategy made the best use of the resources available by concentrating on the channels which were previously

the most successful. With this in mind, we placed a higher portion of the budget into our social media campaign, which achieved the most engagement throughout the first consultation. We used the music and podcasting streaming platform Spotify for the 'digital display' section of the campaign, and Google for a search terms campaign.

2. Paid-for advertising

7. We used the Government's media buying agency, OMD to buy advertising spaces and distribute our paid-for campaign on our behalf on social media, Spotify and Google. Based on our learning from the channels used during the first consultation and industry advice from OMD, the largest share of the communications budget was placed on social media (roughly 60%), which previously achieved the most engagement. Just over half that amount was spent on digital display. Due to the smaller budget for this campaign, we were advised the most effective use of resources would be to use Spotify only and not Ozone (digital billboard style advertising on news sites) as before. The smallest portion was then placed on our Google search campaign, and using the learning from the first consultation campaign we did not use Bing.
8. As stated above, our paid-for advertising campaign aimed to inform the public about the 2023 Boundary Review and drive people towards the consultation website. Wherever possible, we designed the campaign to reach new audiences and particularly to encourage underrepresented groups to have their say. Where we were able to do this and how is outlined in detail below.

2.1 Social media

9. As before, advertising was distributed on Facebook and Instagram to groups aged 16+ and based in England only. The same campaign video and graphics were used, with the exception of the 'deadline' graphic, which was adapted in house with updated text. The advert copy was also updated and improved as needed.
10. After careful consideration, we took a different approach to how the graphics were distributed. During the first consultation, our advertising on social media was based on a 'clicks' or 'traffic' objective, meaning that Facebook would prioritise presenting the adverts to the group of people its algorithm judges most likely to click on an advert shown on their feed. This time, we decided to optimise our advertising for a 'reach' objective, which would allow our adverts to be seen by a far wider audience at an expected lower overall cost. While we knew that the use of this algorithm would result in fewer clicks, we nonetheless decided to implement a reach objective for the social campaign so that more individuals would view the adverts, and we could potentially reach a newer audience.

11. It was important that our social media campaign reached a diverse audience, including underrepresented groups. Our budget for this channel was therefore split into three separate groups, allowing engagement with these audiences to be tracked across the campaign: a younger (16-44) age group, an older (45+) age group, and an ethnic minorities audience. For this latter audience, users whose profiles were recognised as having interests popular with an ethnic minority audience (for example, the Pakistan national football team) were targeted as part of this audience group during the campaign.
12. The social media advertising campaign reached a total of 12.3 million individuals across England, split roughly equally between Facebook and Instagram, at a cost of £7.50 per 1000 people. The adverts were clicked 43,810 times, approximately double the benchmark set by OMD. As expected, this was a lower volume of clicks than during the first consultation, because by casting a wider net with a 'reach' objective, the algorithm wouldn't automatically serve it to the pool of people it thought more likely to interact.

Audience	Reach	Impressions	Clicks	CTR
16-44	7,233,541	30,071,915	13,098	0.05%
45+	3,787,775	15,202,194	21,053	0.14%
Ethnic minorities	5,692,404	22,584,536	9,659	0.04%

13. We saw the most engagement from users aged 45+, which had the highest click through rate of 0.14%. While more cost efficient, with a lower cost per 1000 people, the younger and ethnic minorities audiences had a lower click through rate - although the 16-44 group, which was the biggest audience size, also saw the highest audience reach.
14. The best performing graphic, interestingly, was the same as previously: the 'deadline' image, which used the effective connotations of time pressure to drive people to take action with the text: *Help us draw the line, you've got til April 4th.*
15. A larger budget for the communications campaign during the revised proposals consultation will enable the Commission to reach more people, and drive more users on social media to the consultation website via adverts. It is likely that we would return to the 'traffic' campaign model used during the first consultation, which drove the campaign towards higher numbers of clicks, and the reach should still be widespread with the resources available. OMD have suggested optimisations such as using only Instagram for the younger

audiences, and Facebook for the older, as this might be more resource-efficient.

16. We may also be able to use the further resources to expand the range of graphics, using a creative agency to develop further engaging adverts. It may also be possible to explore the effect of different ad copy and graphics for different age or gender groups. However, we must also be mindful that the consultation on the revised proposals will last for four weeks, meaning fewer opportunities to change direction during the consultation.

2.2 Spotify

17. The Commission placed adverts on the streaming platform Spotify, in the form of display banners and video. Users who engaged with BCE advertising were retargeted with the video asset.

18. A key reason why Spotify was used during the campaign for the secondary consultation was because it was successful during the first consultation in engaging a younger audience.

19. This again proved successful. The campaign even had the best engagement from users ages 18-24, who engaged the most with a click through rate of 0.57%. Of the audience groups, the best performing line was 16-45 video takeover group, with a CTR of 0.70% (exceeding the benchmark of 0.68%). We cut through to a younger audience even more successfully than during the first consultation, where we had seen the highest engagement (0.63%) from users aged 45+, followed by 16-24 year olds with a lower CTR of 0.59%. 390,747 impressions were delivered from the ethnic minorities group at a CTR of 0.64%, which surpasses the benchmarks set.

20. Overall, the campaign reached 645,688 unique users, delivering 2,246,120 impressions of our adverts at an average frequency of 3.5 times to each person, and received 12,851 clicks. This constituted a click through rate (CTR) of 0.57%. The cost per 1000 people (CPM) is higher for Spotify than on social media, with a cost of £28.90, but as we bought on completed views the cost is as planned for.

	Unique reach (approx)	Clicks (approx)
First consultation	598,000	10,000
Secondary consultation	646,000	12,800

21. Men engaged more than women with the Spotify adverts (a 0.66% click through rate vs 0.49%) and future planning with Spotify will take into account how we can improve this.

22. For a future campaign, we may try 'sponsored sessions' (when a single advert is aired for a time period) on Spotify which usually generate high user engagement; if the budget allows it would also be useful to try creative testing for adverts targeted by gender.

2.3 Google

23. In the final channel of our paid-for advertising, text adverts directing the public to the consultation website were displayed above the results on Google for certain searches. The formats used were RSA (responsive search adverts) and DSA (dynamic search adverts). All adults in England were targeted, and it was not possible to target separate audiences within this. This part of the campaign had the lowest spend.

24. The RSAs used multiple headlines and descriptions, so Google could test different combinations and learn which combinations perform best over time. Improvements and adaptations were made to the copy used in the previous campaign. Optimisations were also made during the campaign. We experimented by including some search terms pertaining to the public hearings, but as these did not gain much engagement we stripped these from the list of terms during the campaign.

25. The campaign achieved 55,384 impressions and 9,705 clicks, with a click through rate of 17.52%. This is lower than expected due to the fact that the number of people searching for related terms was lower, and meant there was an underspend for this part of the campaign. The highest click through rate was seen from the people aged 45-65+, and men made up 62% of the overall clicks.

26. In the future, we will increase the number of headlines on the search adverts, which should help to improve engagement. We can also expect to see more engagement with the search campaign, if more money is spent on parts of the campaign which push people to search around the Boundary Review - i.e. a print advert in the national press.

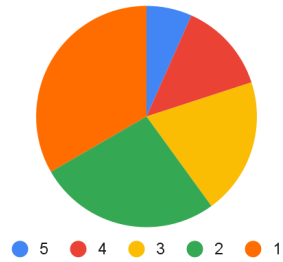
3. Organic communications

27. The Boundary Commission's own channels were used in the build up to and throughout the secondary consultation to publish informative and engaging content alongside the paid-for advertising campaign. Eventbrite, which was free to use, was chosen as the best platform through which members of the public could book a free ten minute slot to speak at a public hearing in their area.

28. A dedicated webpage on the corporate website was created as the main source of information about the public hearings, and a link to the webpage was included on the regional pages on the consultation portal. The dates and locations for each hearing were listed clearly on this page, and after clicking the link for a chosen event the public were taken to Eventbrite to register their information and book a free slot. When booking, the public were asked to input key information including their contact details, whether they would present in a language other than English, and confirmation that they understand a recording would be made of the hearing and published on the BCE YouTube channel - all the information collected aided in the smooth running of the hearings.
29. To make the process as easy as possible, [an easy read step-by-step guide to booking on Eventbrite with images](#) was published on the public hearings webpage. Within this guide and on the webpage, we stated that in the case of any difficulties, a member of the team could make a booking on someone's behalf over the phone or via email on their behalf.
30. In addition, a [Guide to the public hearings](#) was published in HTML and PDF format on the corporate website, constituting a comprehensive source of guidance for attendees on what to expect. Information around Covid-19 was included within this guide and kept updated on the public hearings webpage.
31. After the public hearings, a survey was distributed to everyone who had attended and spoken at a hearing, receiving over 170 responses. Insights from these included:
- When asked where they had heard about the public hearings, and of the boundary review more generally, the most popular answer was 'through my council, local representative or MP', followed by 'through my organisation or work', 'social media post or advert from the BCE' and 'word of mouth'. The efficacy of the Commission's 'partner pack' of publicity resources distributed to local authorities (see 5. Stakeholders) can also be seen in the number of respondents who received information through their council.
 - When asked to rate how they found the booking process, from 1 'easy' to 5 'difficult', 79% of respondents chose either option '1' or '2'.

How did you find the booking process?

1 = easy, 5 = difficult

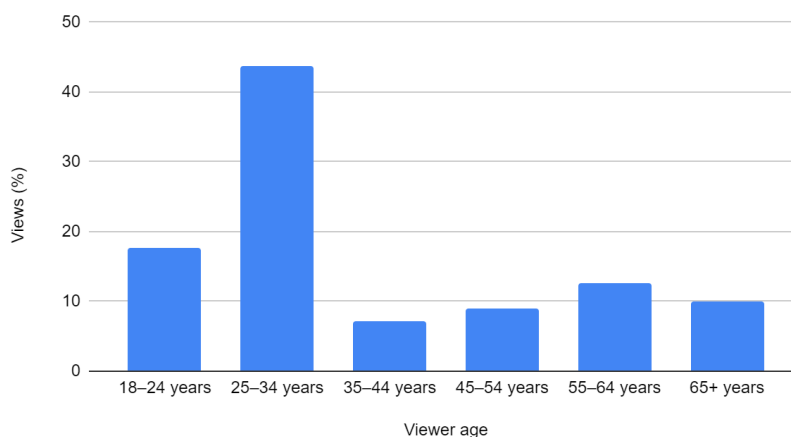


- Respondents had the opportunity to write in their own comments at the end of the survey, the vast majority of which were positive comments about their experience including friendliness of staff, and the suitability and accessibility of the hearing locations. Only a few comments expressed dissatisfaction, and this feedback can be taken on board for the future.
32. To keep track of visits to the public hearings webpage garnered from organic communications (instead of navigating from a different page on the website), and to shorten an unwieldy and long URL, the shortened bitly link bit.ly/bcepublichearings was used in all communications including social media posts, the partner pack, press releases, blogs etc. This achieved over 9,100 clicks over the course of the campaign.
 33. Between 22 February and 4 April 2022, there were 82,874 unique visits to the consultation portal bcereviews.org.uk, with over 300,000 page views during this time. The bounce rate, referring to visitors who view only a single webpage on the site before exiting, was slightly lower than during the first consultation at 33.49% from 35.08%.
 34. Between 22 February and 4 April 2022, 19,464 sessions were opened by visitors on the corporate website boundarycommissionforengland.independent.gov.uk, with 45,580 separate page views. The bounce rate was higher than during the first consultation at 50.97% from 41.82%, but shouldn't be considered a cause for concern: the average may have been raised by those who navigated to the public hearings webpage before exiting the website via the Eventbrite links.
 35. To build and maintain interest, content was published frequently before and during the consultation in the form of social media posts, news releases and blogs.
 36. Blogs were written by the Communications Manager after interviewing Assistant Commissioners and Secretariat staff, to give a 'behind the scenes' insight into the running of the public hearings, e.g [this blog from Assistant Commissioner for London John Feavour](#). Photos from the public hearing

venues and quotes from blogs were used to keep social media content fresh and engaging: [example 1](#) and [example 2](#). Our tweet launching the consultation reached around 19k impressions, and throughout the consultation tweets usually received between 1,500-3,500 impressions. On Facebook, the consultation launch post was shared more widely, receiving over 50k impressions and reaching 47,487 individuals. Facebook posts published throughout the consultation period were usually also seen more times than on Twitter, with each receiving between 1,500-8,500 impressions - often, receiving more engagement than posts during the first consultation.

37. The news piece announcing the consultation launch was viewed 3,325 times, and with 2,743 clicks on the [bcereviews](#) link within it (tracked via bitly) successfully drove the majority of those visitors to the portal. The number of views for this first article is much lower than its equivalent during the first consultation, showing the challenge of recreating the level of interest for a more technical consultation.
38. Recordings of public hearings were placed on the [BCE YouTube channel](#) as soon as possible after each day of the hearings took place, and usually within one day. Constituting over 160 hours of footage, this means that those unable

Views (%) vs Viewer age



to attend could still listen to the evidence which was given at the hearing. The number of views for each hearing playlist ranged widely, with the most popular being Birmingham (309 views), Middlesbrough (271), and Preston (222). Viewer age also differed, but was mostly young, with 44% aged between 25-34 and 18% between 18-24. The estimated total hours of viewing time of our content from our audience was around 650 hours.

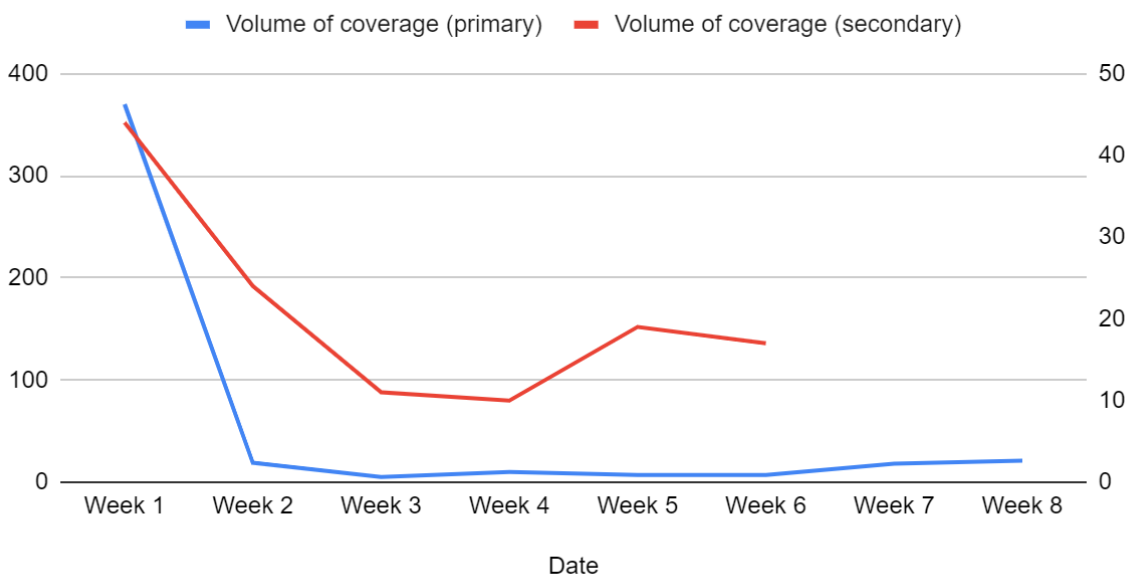
39. When submitting a representation online, visitors were asked where they had heard about the review. Most respondents chose 'other' (often a kneejerk response to fill in the box, and therefore shouldn't be read into too much), followed by 'Facebook', 'local newspaper' and 'other social media'.

4. Media

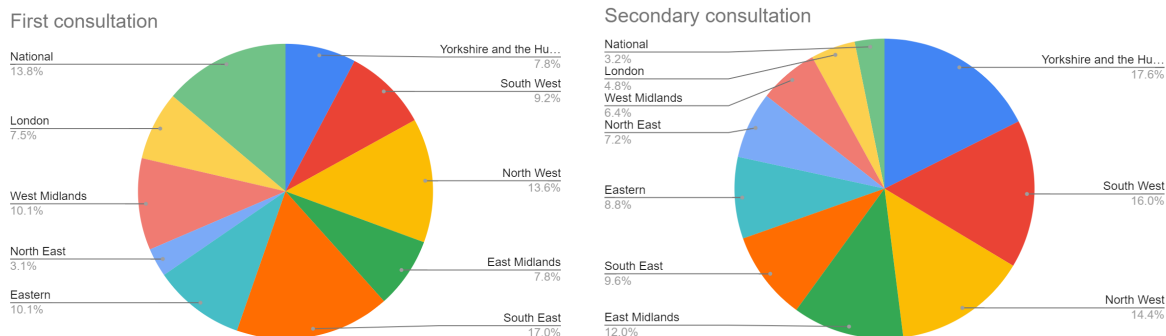
40. It was expected that regional outlets would have more interest in the secondary consultation than national outlets. We aimed to capitalise on and drive forward local interest in the public hearings by encouraging local press as much as possible. A national press release was circulated to all media contacts when the booking platform for the hearings opened, and again on the launch of the consultation. Afterwards, press releases tailored for each region were distributed in a staggered fashion before each lead hearing to press contacts in that region - usually around 300-500 in each - as well as to national outlets. The media contact list was kept updated to ensure that an even spread of as many outlets as possible from each region were included in the press mailouts.
41. A personal press release was sent to journalists with whom we had already built a relationship through previous contact or interviews. The Secretariat took part in five radio interviews in the period shortly before and during the public consultation, for LBC News, BBC Radio Berkshire, BBC Radio Solent and BBC Radio Gloucestershire twice. During the interviews, listeners were directed towards the consultation portal and made aware of the public hearings. Written responses were also provided upon request. To assist in improving engagement with a younger audience, student newspapers were included in the press distribution list, and one request for comment came from a university paper, resulting in coverage.
42. The Boundary Commission received 125 pieces of coverage during the secondary consultation. Approximately 40 further articles had been published in the weeks building-up to the launch, after a press release was circulated for the opening of the booking system in late January. During the first consultation, the Commission received 486 pieces of coverage including 9 interviews given by spokespeople. However, as the data below shows, while the volume of coverage during the first week was much lower this time, from the second week and beyond the number of articles published was similar to or higher than recorded during the first consultation. The impact of the Ukraine war on the stories outlets both national and regional chose to cover would also have had a significant impact on boundary review coverage.

Date	Coverage (first consultation)	Coverage (secondary consultation)
Week 1	370	44
Week 2	19	24
Week 3	5	11
Week 4	10	10
Week 5	7	19
Week 6	7	17
Week 7	18	-
Week 8	21	-

Volume of coverage (primary) and Volume of coverage (secondary)



43. Looking at the coverage per region, media outlets from Yorkshire and the Humber and the South West regions had the biggest increase in the share of articles published.



44. The vast majority (approx. 90%) of coverage was balanced in sentiment, helped by the inclusion of key messages from the press releases - this is a very similar percentage to the first consultation. While the volume of local and national coverage was no doubt affected by the war in Ukraine, the news articles that were published were of an effective quality. This is judged by evaluating whether certain key messages were included: did journalists point readers or listeners towards the consultation portal; was the Commission stated to be independent or impartial or the process affirmed as fair; did the article explain why the boundary review needed to take place, instead of presenting the changes as imposed upon constituents with no context; and finally, did the article state that local views would be taken into account or that there was an opportunity for members of the public to have their say.

Key message	% included during first consultation	% included during secondary consultation
Consultation website	55%	71%
Fair/ impartial/ independent	25%	25%
Why - equal weight, rebalance numbers etc	84%	84%
Taking local views into account	75%	90%

45. Around 40% of news articles published over the consultation period also included the link to the booking page for public hearings or pointed towards the public hearings more generally. News articles were much more likely to point towards the consultation website, and the significant increase in the share of coverage which included the address compared to during the previous consultation (as the table above shows) is likely down to the stronger emphasis on this within the materials distributed to the press.

46. Therefore, while the volume of coverage around the launch started lower than may have been hoped for due to reasons outside of the control of the Commission, the strategy of distributing materials at planned intervals helped build back momentum and keep the story relevant for a local audience, thus improving awareness of the consultation at a grassroots level.

5. Stakeholders

47. As during the previous consultation, a 'partner pack' of explanatory materials and publicity resources was circulated to local authorities to encourage awareness raising at a local level. This included template posts for social media, text for websites and bulletins, a factsheet, an FAQ sheet and more. Posters and flyers were included with an encouragement to place them in local venues such as libraries and council offices, in order to help the Commission reach a non-digital audience. The pack also requested councils reach out to Diversity Officers, if available, to ensure communications take underrepresented audiences into account in their planning.

48. The content had received positive feedback during a survey conducted by the Commission, and was released further in advance this time as suggested by respondents. During the preparations, the Communications Manager had reached out to and met with communication representatives from several councils to gather some more in-depth feedback, and updated and improved the pack's contents to aid its effectiveness for teams.

49. The partner pack was downloaded a total of 2,255 times from the emails to stakeholders alone (over 1,000 times more than previously) and [can also be downloaded from the Boundary Commission for England website here](#). Of the resources inside, the zip file containing images for social media, to go alongside the text suggested in the pack if desired, was downloaded 257 times. A factsheet contained within the pack was saved a further 80 times.

50. A high volume of content was again continually posted by councils during the consultation, using the suggested images and/or text from the pack. On top of this, local authorities also included content about the boundary review on their websites.

51. The Commission continued to build and maintain relationships with the Association of Electoral Administrators (AEA), the National Association of Local Councils (NALC) and the Local Government Association (LGA), organising regular updates to be sent out in their respective bulletins. Prior to the launch, the Secretary to the Commission and the Communications Manager attended the AEA's national conference in January, giving a presentation to around 150 attendees which outlined the Commission's work,

flagged the upcoming consultation, and offered the opportunity to answer questions.

52. A survey on the partner pack was circulated after the consultation, giving local authorities the chance to give feedback on the materials and offer ideas for any helpful actions the Commission could take in the future. Of the 52 responses:

- 64% used the sample posts for social media
- 58% used the text for websites or bulletins
- 39% used the press release (as the partner pack was sent out ahead of the launch, the pack instead pointed towards the webpage where the press release would be published)
- The vast majority of respondents (89%) found the information included in the pack clear and understandable, and the same percentage found the pack useful in general
- Comments included:
 - “We did a bit of promotion and the pack supported this”
 - “[...] it brought all the relevant information together in one place and it was user friendly”
 - “Saved a lot of leg work, with all key information provided; enabled councils to tailor for their areas”
 - “It's very good, we are a very busy service and to be able to use such materials is important to ensure we all send clear, accurate and consistent messages out”
 - “Helpful content in an easy to follow format”
 - “I think it is so much clearer and easy to understand than previously”
- When asked how teams chose to publicise the consultation, if able to do so, the channels most mentioned were social media, websites, and e-newsletters; also often mentioned were notice boards, emails to councillors and parish councils, social media, posters in council premises, and email distribution to local media.
- When asked of any challenges in raising awareness, most replied ‘none’. The few examples given included the competition with “big news stories” meaning “It's not top of the agenda for most residents” and that as there were no major changes proposed for the area, it was harder to raise awareness. It can also be estimated that preparations for the local elections would have been a significant draw on time and resources for councils.
- However, feedback for the partner pack from stakeholders was very positive, showing it to be a valuable and cost-effective resource in helping make it easier for local authorities to spread the word in their areas.

6. Recommendations

53. Later this year the Commission will publish its revised proposals for constituencies across England, and invite the public to comment on them during a final consultation lasting four weeks. The following recommendations, based on the evaluation set out in this report, should be used to enhance the effectiveness of the communications activities undertaken by the Commission in the upcoming final campaign.
54. The revised proposals consultation will have the advantage of a higher budget, and these resources will be used to drive as many people as possible through to the consultation portal to inform them of the review and their opportunity to make a representation. It must be noted that the time period allowed by law for the third public consultation is significantly shorter, and this limits both the amount of time available to the public to take action by submitting a representation, and opportunities for the Commission to change direction during the campaign.
55. However, as the third consultation represents the final opportunity for the public to submit their opinions on the proposals, by placing an emphasis on this 'last chance' element when reaching out to the media and distributing adverts, the campaign can use the strength and urgency of this message to lead to further engagement. As it is a shorter consultation period, the Commission will use its social media channels and website to begin to build interest some time before the consultation launch date.
56. If resources are available, it is recommended that a creative agency be used to expand the range of graphics used in the paid-for advertising campaign. New images can be created which follow along the lead of the graphic which achieved the most engagement in both campaigns - the 'deadline' graphic, which drew attention to the time limit for sending in a representation. To a lesser degree, and again if the budget is available, we may follow a suggestion from OMD to try AB testing. This would explore whether different adverts would be more effective in drawing in different age groups or genders.
57. For our paid-for advertising campaign, we recommend using Facebook and Instagram as before, which has proved effective in raising awareness of the Review. Due to the higher budget for the final campaign, we also plan to run print advertising on national newspapers with the expectation of reaching a wide audience in this way. On advice from OMD, we can explore using different platforms to reach out to age groups. For example, it may be a more efficient use of resources to only use Instagram for younger audiences, and Facebook for older demographics.
58. In addition, we will distribute digital display advertising on Spotify, and on online news sites via Ozone with the campaign video and banners - which we

may be able to refresh using a creative agency, as with the social media campaign, if resources allow. We will also look into the use of sponsored sessions on Spotify, where users are offered 30 minutes of uninterrupted audio streaming if they watch the campaign video. On Google, we will again run a search terms campaign, this time using more options for headlines on adverts to encourage more clicks as advised by OMD.

59. The partner pack received positive feedback from respondents to the Commission's survey and an updated version will be produced for the final consultation. It should again be sent out to local authorities in good time to allow the information to be cascaded to teams internally and to help the communications teams plan their content. In communications to local authorities, emphasis should be placed on the importance of distributing the information to constituents in their area, as the third consultation represents the final chance for the public to have their say.
60. The Commission should also take advantage of opportunities to raise its profile in between consultations, as this will help with raising awareness both of the Review and the role of the BCE more generally. The Commission will attend Civil Service Live in July 2022, an event expected to be attended by government departments and organisations from both the private and public sector. We have paid for the use of an exhibition stand from which staff will demonstrate the consultation website alongside a representative from Informed, our website developer. We will promote our attendance using social media and this will help generate engagement with the Commission via interesting online content in the period before the revised proposals consultation. In addition, we plan to mark events such as local democracy week or similar, which will also help to raise the profile of the Commission and its work. If resources are available it is recommended that we work with a creative agency to develop effective content for our website for this.