Department for Levelling Up, Housing & Communities

Infrastructure and Projects Authority

To: Stuart Ison**,** Senior Responsible Owner for the Electoral Integrity Programme

From: Sarah Healey, Permanent Secretary of Department for Levelling Up, Housing and Communities; and

Nick Smallwood, Chief Executive Officer of the Infrastructure and Projects Authority

14th February 2024

Dear Stuart Ison,

APPOINTMENT AS SENIOR RESPONSIBLE OWNER FOR THE ELECTORAL INTEGRITY PROGRAMME

We are writing to confirm your appointment as Senior Responsible Owner (SRO) of the Electoral Integrity Programme with effect from 2nd January 2024. This letter sets out your responsibilities and the support you can expect from your department and the Infrastructure and Projects Authority.

As SRO, you are directly accountable to Catherine Frances, Director General of Local Governance, Resilience and Communities portfolio, under the oversight of Sarah Healey as accounting officer for Department for Levelling Up, Housing and Communities, and Simon Hoare MP, Parliamentary Under Secretary of State for the Department for Levelling Up, Housing and Communities.

Where your portfolio involves grant-funded initiatives of any type, you are directly accountable to Matt Thurstan as the Senior Officer Accountable for Grant schemes in DLUHC. This is in addition to any accountabilities you may have from a GMPP and DLUHC governance perspective.

Your programme forms part of the Local Governance, Resilience and Communities portfolio, under the oversight of the Chair of the Local Governance, Resilience and Communities Portfolio Board, and is included in the Government Major Projects Portfolio (GMPP).

You have personal responsibility for the delivery of Electoral Integrity Programme and will be held accountable for the delivery of its objectives, with policy intent and outcomes expected. This encompasses securing and protecting its vision, ensuring that it is governed responsibly, reported on honestly, escalated

appropriately, and influencing the context, culture, and operating environment of the Electoral Integrity Programme**.**

You are also responsible for ensuring any grant-funded initiatives within your portfolio are designed, developed and delivered in line with the Government Grant Functional Standard and the associated Minimum Requirements as set out in *Annex A*. These became mandatory for all government departments from 30 September 2021.

You are responsible for ensuring the ongoing viability of the Electoral Integrity Programme and recommending its pause or termination if appropriate. Where issues arise which you are unable to resolve, you are responsible for escalating these to the Local Governance, Resilience and Communities Portfolio Board.

You remain accountable to Ministers, as set out in the Civil Service Code, and should deliver the project in accordance with the objectives and policy intent as set by Ministers.

In addition to your internal accountabilities, SROs for GMPP projects and programmes are personally accountable to Parliamentary Select Committees. This means that, from the date of this letter, you will be held personally accountable to and could be called by Select Committees to account for and explain the decisions and actions you have taken to deliver the Electoral Integrity Programme.

It is important to be clear that your accountability relates only to implementation, within the agreed terms in this letter; it will remain for the Minister to account for the relevant policy decisions and development.

More information on this is set out in [Giving Evidence to Select Committees - Guidance for Civil Servants](#), sometimes known as the Osmotherly Rules. Information on the roles and responsibilities of the SRO are detailed in the Infrastructure and Project Authority's guidance on [the role of the senior responsible owner](#). You should also make yourself familiar with the [Government Functional Standard for Project Delivery](#), the requirements of the Government Project Delivery Framework, and the guidance and requirements for project delivery as set by the department's Central Portfolio Office.

Time commitment and tenure

This role will require 50% or more of your time to enable effective delivery of the role and execute your responsibilities in full.

You are required to undertake this role until achievement of programme close, currently planned for March 2025. Progress towards this will be reflected in your personal objectives. Any changes to the agreed time commitment or tenure of the role, as set out above, will require both departmental and Infrastructure & Projects Authority consent.

If you cease acting as SRO for one or more grant-funded initiatives within your portfolio, please email the DLUHC Grants Centre of Excellence Team with details of the replacement SRO. This is to ensure that both departmental and wider Government Grant Information System records are accurate and can be updated. You are also responsible for ensuring there is a smooth, informed handover to the new SRO.

Objectives and performance criteria

The policy intent supported by this programme is explained in *Annex B*. Any proposed changes to scope which impacts on this intent or the realisation of benefits must be authorised by the Electoral Integrity Programme Board and may be subject to further levels of approval.

The vision of the programme is to realise the 2019 Conservative Manifesto commitments to "*protect the integrity of our democracy, by introducing identification to vote at polling stations, stopping postal vote harvesting and measures to prevent any foreign interference in elections; make it easier for British expats to vote in Parliamentary elections, and get rid of the arbitrary 15-year limit on their voting rights; and ensure that no one is put off from engaging in politics or standing in an election by threats, harassment or abuse, whether in person or online*".

and its remaining objectives are to implement the following:

- **Apply at 2 May 2024 polls, and the next UK Parliamentary General Election, the following measures:** Voter identification; Accessibility; Postal and Proxy Voting; Online Absent Voting Application and Identity Verification Service; Overseas Electors; and Campaigning Measures (see *Annex B* for further details).
- By end May 2024: Voting and Candidacy Rights of EU Citizens in Local Elections: a position where EUVCR is based on reciprocity, and voting and candidacy rights can be changed as bilateral agreements are signed.
- Manage the transition from programme activities to business as usual and live service, supporting the electoral sector through the changes.
- Manage the closure of the programme, including establishing a process for ongoing evaluation of the programme and benefits realisation for the next two UK Parliamentary General Elections.

Your personal objectives and performance criteria which relate to the Electoral Integrity Programme are to deliver the above objectives of the Electoral Integrity Programme to its agreed timescales and budget.

You are expected to run your project in accordance with the Government Functional Standard for Project Delivery, the other Functional Standards as applicable to this programme and the requirements of the Government Project Delivery Framework.

Extent and limit of accountability

Finance and Controls

HM Treasury spending controls will apply on the basis set out within the department's delegated authority letter. Where the programme exceeds the delegated authority set by HM Treasury, the Treasury Approval Point process will apply, and the details of each approval process must be agreed with your HM Treasury spending team. You should consult departmental finance colleagues on how to go about this.

You should note that where expenditure is considered novel, contentious, repercussive, or likely to result in costs to other parts of the public sector, HM Treasury approval will be required, regardless of whether the programme expenditure exceeds the delegated authority set by HM Treasury. If in doubt about whether approval is required you should, in the first instance, consult departmental finance colleagues before raising with the relevant HM Treasury spending team.

The overall estimated budget, resourcing requirements and tolerances for your project/programme will be agreed as part of the approval process. You will be expected to deliver within these tolerances and report quarterly on these as part of GMPP reporting.

You should operate at all times within the rules set out in Managing Public Money. In addition, you must be mindful of, and act in accordance with, the specific HM Treasury delegated limits and Cabinet Office controls relevant to Electoral Integrity Programme. Information on these controls can be found here: Cabinet Office controls.

<u>Delegated authority</u>

You are authorised to approve expenditure as set out in your delegation letter issued by DLUHC Finance. You must escalate via the Electoral Integrity Programme Board to the accounting officer:

- Proposed changes to the programme scope which impact on its intent or expected benefits realisation.
- Slippage or any proposed change which materially impacts on wider DLUHC objectives (including Ministerial objectives), or adversely affects completion of the programme schedule or its funding.
- Where issues arise which take you outside of these authority limits and which you are unable to resolve.
- Recommendation of the need to either pause or terminate the programme where necessary and in a timely manner.

These authority limits are subject to change and other conditions or tolerances may be set as part of the business case approval and ongoing monitoring processes which you should then operate within.

Where issues arise which take you outside of these authority limits which you are unable to resolve, you are responsible for escalating these issues to Catherine Frances, Local Government, Resilience and Communities Director General and the Local Government, Resilience and Communities Portfolio Board.

Appointments

You should make appointments as required for the control and delivery of your programme within your delegated authority.

Governance and assurance

You should pay attention to ensuring effective governance for your programme, including the maintenance of a programme board with appropriate membership and clear terms of reference.

You should also ensure that the programme remains aligned to the strategic outcomes, costs, timescales, and benefits in line with the approved business case as well as monitoring the context within which the programme is being delivered to ensure it remains valid.

Where a change impacts the scope, costs, benefits, or planned delivery milestones agreed as part of an agreed business case, you are responsible for following the agreed change request approval process and setting a new, approved, business case baseline.

You should ensure that an accounting officer assessment is completed alongside the approval of the Outline Business Case and that this is published on GOV.UK as part of the government's transparency requirements on major projects. You are responsible for bringing to the attention of the accounting officer any material changes in the programme which could require a new accounting officer assessment to be completed and published. Guidance on completing accounting officer assessments for major projects is available from HM Treasury.

Although you are directly accountable for this programme, you are also expected to support delivery of the department's overall strategic objectives. This means that you are expected to work collaboratively with other SROs and project directors in adjacent projects and programmes and with the Local Government, Resilience and Communities portfolio management office and portfolio director to manage dependencies,

resources, schedules, and funding to support delivery of the overall change the department needs to achieve its strategic objectives.

You should ensure that appropriate and proportionate assurance is in place and agree on the level and frequency of assurance reviews through the maintenance of an integrated assurance and approvals plan. You should maintain this plan in collaboration with the Departmental Assurance Coordinator and the Infrastructure and Projects Authority.

Programme status, reporting and transparency requirements

The programme status at the date of your appointment is reflected in the most recent quarterly return on the programme to the Infrastructure and Projects Authority and is the agreed position as you assume formal ownership of the programme.

You are responsible for ensuring the honest and timely reporting on the position of the programme to the Infrastructure and Projects Authority while it remains on the GMPP and for providing reports and information to the Local Government, Resilience and Communities portfolio management office as required. In future, reporting should include carbon measurement, and other sustainable development goals in accordance with evolving government policy and standards. Information on the programme will be published annually by the Infrastructure and Projects Authority.

Development and support

As a graduate of the Major Projects Leadership Academy, you are expected to maintain your continuing professional development as a project leader, including your status as an accredited assurance reviewer. To maintain your accreditation, you will be required to participate in a review at least once every 12 months.

The department will assist you in securing the necessary resources to support the programme, and will set clear guidance, requirements and standards, which align to the Government Functional Standard on Project Delivery, to enable good governance and effective delivery. You will be part of the department's cohort of major project leaders who will be expected to support each other, share good practice and lessons learned and to collectively develop solutions. You should liaise with the department's Head of Profession for project delivery to discuss the maintenance and development of your delivery and leadership skills.

The Infrastructure and Projects Authority will be available to you for support, advice, and assurance throughout the programme's time on the GMPP.

The Local Government, Resilience and Communities Portfolio Board will provide ongoing oversight and support and will take steps to help resolve and escalate risks, issues or constraints that are acting as a blocker to successful delivery.

Government Grant Functional Standards

Where you are an SRO of one or more grant-funded initiatives, you should operate at all times within the rules set out in the Government Grant Functional Standard and Managing Public Money. Minimum Requirement One of the Government Grant Functional Standard provides background and specific guidance on your SRO role obligations and responsibilities. In addition, you must be mindful of, and act in

accordance with, the specific HM Treasury delegated limits and Cabinet Office controls applicable to the relevant grant-funded initiative(s).

You are also responsible for familiarising yourself with relevant information and good practice documentation from the Cabinet Office Grant Centre of Excellence website, including the Code of Conduct for Recipients of Government Grants

In addition, it is also your responsibility to undertake the SRO training provided by the Cabinet Office Grant Centre of Excellence on an annual basis. This can be accessed at SRO learning – Grant Centre of Excellence (civilservice.gov.uk) (registration on the Centre of Excellence Portal is required). You are also responsible for ensuring that any staff involved in the design, development or delivery of grant-funded initiatives, within your remit, complete the required minimum mandatory grant management e-learning. Details can be found in the Grant Learning section of the DLUHC Grants Community Hub.
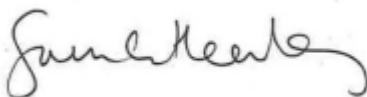
You should also ensure that there is a process in place to ensure that all key documents for grant-related initiatives are retained in the appropriate way and for the correct length of time. This should include documentary evidence of all key decisions taken in the development of the grant scheme, as well as invoices, receipts and accounting records provided by the grant recipient as detailed in the grant agreement. This should be on a shared drive and be accessible by key staff, auditors and the DLUHC Grants Centre of Excellence when required.

The DLUHC Grant Centre of Excellence team and Cabinet Office Government Grant Management Function (GGMF) colleagues are available to provide further support and advice on the Government Grant Functional Standards and best practice.

The new DLUHC Grants Community Hub also offers useful information and resources, including essential documents, templates, training and guidance to inform grant-making across the department. The Cabinet Office GGMF website also has a resources library which you are encouraged to access and review: Standard documents – Grant Centre of Excellence (civilservice.gov.uk)]

On receipt of this letter, please sign it electronically and send a copy of the signed version to the DLUHC Grant Centre of Excellence team at Grants.Champion@levellingup.gov.uk. This is to ensure the department complies with the requirement for departmental SRO letters for grants to be uploaded into the Government Grant Information System.

Yours sincerely,

SARAH HEALEY

Permanent Secretary, Department for Levelling Up, Housing and Communities

NICK SMALLWOOD

Chief Executive Officer, Infrastructure and Projects Authority

CONFIRMATION OF ACCEPTANCE OF APPOINTMENT

I confirm that I accept the appointment of Senior Responsible Owner for the programme, including my personal accountability for implementation, as set out in the letter above.

Stuart Ison

15th February 2024

ANNEX A

Government Grant Functional Standard [1]

1. The Government Grant Functional Standard and its accompanying minimum requirements can be found at https://www.gov.uk/government/publications/grants-standards
2. The Government Grant Functional Standard and associated minimum requirements operate on a **'comply or explain'** basis. In practice, this means the department should demonstrate compliance with the minimum requirements or where that is not possible for specific elements of the requirements, develop a supporting rationale providing justification for any areas of non-compliance, as part of the business case, signed off by an appropriate person within the organisation.
3. The department has implemented the new standard Model Grant Funding Agreement for government departments, drafted to be fully compliant with Minimum Requirement Six of the Government Grant Functional Standard.
4. Standard Grant Determination templates have also been developed and are available in the DLUHC Grants Community Hub for use with relevant grant schemes.
5. For information purposes, here are some of the significant headlines from the minimum requirements;

- All government grant schemes require a named Senior Responsible Officer with clearly defined responsibilities throughout the lifetime of the scheme.
- Departments will ensure they have a robust grants approval process to approve spend over £100k and ensure that details of all current grant schemes and awards are available on the Government Grant Information System (GGIS) where all award schemes must be recorded. In DLUHC, your grant scheme Finance Business Partner is responsible for ensuring relevant and timely information is provided to the relevant GGIS liaison team in Finance Directorate. As SRO, it is your responsibility to ensure the relevant Finance Business Partner fulfils their obligations on behalf of your grant scheme.
- All new government grant schemes, including those that are high risk, novel, contentious or repercussive, as well as those undergoing a step change in scope or funding, are strongly encouraged for referral to the Complex Grant Advice Panel (CGAP) for scrutiny and advice from subject experts. Schemes that are referenced in the Government's election manifesto and in the Government Grants Pipeline Control Guidance are subject to mandatory referral, follow-up and reporting against the Panel's recommendations as set out in Minimum Requirement Three.
- A robust business case, proportionate to the level of expenditure and risk, must be developed for all government grant schemes. This will be scrutinised and approved in stages, as part of the grant scheme approval process, in line with the guidance in Managing Public Money.
- Government grant schemes should be competed by default; exceptions may be approved where competition would not be appropriate. Detailed supporting evidence for any direct award decision or other non-competitive approach must be provided in the approved business case.
- All government grant schemes must be awarded through robust grant scheme agreement documents. These must be proportionate to the value of the grant scheme and reflect the minimum requirements for government grant schemes, in line with guidance in Managing Public Money. All government grant scheme agreements/grant scheme determination documents should include terms of eligible expenditure.
- All government grant schemes will be subject to timely and proportionate due diligence, assurance, risk management and fraud risk assessment.
- All government grant schemes will have performance measures and longer-term outcomes defined, wherever possible, to enable active performance management, including regular reviews and adjustments where deemed necessary.
- All government grant schemes will be reviewed annually at a minimum with a focus on financial reconciliation, taking into account delivery across the period, resulting in a decision to continue, discontinue, amend or clawback funding.
- All those involved in the development and administration of grant schemes must undertake core training in grant schemes management best practice. Details of the prescribed learning can be

found in the Grants Learning section of the DLUHC Grants Community Hub.

Please note: Whilst the Government Grant Functional Standards and associated responsibilities set out in the above letter apply to all grant schemes, in some cases specific DLUHC grant scheme responsibilities may be delegated to Local Authorities or other designated bodies as part of the agreed delivery arrangements.

In such cases, as the relevant SRO, you must still ensure that the department fulfils its overall obligations in respect of that grant initiatives and also ensure that the relevant designated bodies are aware of their specific, delegated grant management obligations and responsibilities, as part of the grant agreement or other relevant documentation.

ANNEX B - THE POLICY INTENT OF THE PROGRAMME

The Government is seeking to strengthen the integrity of our electoral system and ensure that our elections remain secure, fair, modern, and transparent. The Government manifesto set out this commitment to protecting our democracy and ensuring that it remains fit for the modern age.

The delivery of the Electoral Integrity Programme aligns with DLUHC's priority outcome 4: A sustainable and resilient local government sector that delivers priority services and empowers communities.

The Electoral Integrity Programme is responsible for the delivery of the Elections Act 2022, development of necessary secondary legislation, and the substantial volume of complex business change, including digital development and risk mitigation activities, into the electoral sector.

To note, the programme scope previously included an additional project supporting the delivery of the postponed May 2021 Elections. The May 21 Delivery Project is now completed. The scope of the programme now focuses on the implementation op the measures contained with the Elections Act 2022, and necessary risk mitigation activities for successful Programme delivery.

Policy areas covered:

1. **Voter identification:** Electors will be required to show photographic identification at UK Parliamentary General Elections, and Local Elections in England from 2023 onwards. Those electors without photographic identification will be able to get a locally issued Voter Card.
2. **Postal and Proxy Voting:** A three-year limit on postal vote applications will be introduced. A person will only be able to act as a proxy for a maximum of four electors (of which no more than two can be for 'domestic' electors) at any given time.
3. **Accessibility:** The Government launched a call for evidence in 2017 to improve the electoral process for people with disabilities. The main changes will include:
   a. Providing a broader requirement for Returning Officers to provide support for people with a wider range of disabilities.
   b. Removing restrictions on who can act as a companion to assist disabled voters. This will ensure that those such as carers can assist disabled voters.
4. **Overseas Electors:** Extend the franchise to all British citizens overseas who have been previously registered or resident in the UK and introduce changes to update and improve the registration and registration renewal processes.
5. **Campaigning Measures:** Comprises various measures that will help strengthen and modernise the regulatory framework which governs electoral campaigning.
   I. **Notional Expenditure:** Amending rules on notional expenditure to provide that a benefit in kind can only be made use of on behalf of a candidate or agent (or other entity such as a political party or third-party campaigner) where they have authorised it.
   II. **Intimidation Sanction:** A new electoral sanction will be introduced to ban those convicted of intimidating a candidate, future candidate, campaigner, or elected officeholder from standing for, being elected to, or holding elective office for five years.
   III. **Undue Influence:** Legislation will be made clearer to allow stakeholders to understand what is and what is not considered undue influence, enabling better enforcement of the legislation.
   IV. **Digital Imprints:** An imprint will be required on digital political material in scope of the regime outlining who has promoted the material and on whose behalf.

V.   **Electoral Commission governance and accountability:** We will make provision for the introduction of a Strategy and Policy Statement that the Electoral Commission (EC) will need to give regard to in the discharge of its functions; expressly prevent EC from bringing criminal prosecutions in England, Wales and Northern Ireland; and give the Speaker's Committee on the Electoral Commission (SCEC) powers to scrutinise the work of the EC.

VI.   **Political Finance:**
   a.   *Third-party campaigner registration:* Create a new lower tier of registration for third-party campaigners spending more than £10,000 but less than the existing thresholds for each part of the UK.
   b.   *Restricting all third-party campaigning to UK-based entities and eligible overseas electors:* Only spending by UK-based entities and registered overseas electors will be allowed.
   c.   *Ban on registering as both a political party and third-party campaigner:* Political parties will be removed from the list of entities that are able to register as a third-party campaigner and registered third-party campaigners will be prohibited from registering as a political party.
   d.   *Restrictions on coordinated spending:* Political parties and third-party campaigners working together must both report any coordinated spending/joint campaigning.
   e.   *Asset declaration for registration of new political parties:* Political parties will be required to submit a declaration of their assets and liabilities upon registration if they have assets or liabilities over £500.

6.   **Voting and candidacy rights of EU citizens in local elections:** Adjust the franchise so that the voting and candidacy rights of EU citizens arriving in the UK post-exit are based on reciprocity.

7.   **Online Absent Voting Application and Identity Verification Service:** The programme scope also includes the creation of an Online Absent Voting Application and Identity Verification Service for absent vote and registration applications.