

LGBCS Paper 2536**2019 Review of Electoral Arrangements
Public Consultation – Argyll and Bute, Highland and North Ayrshire council
areas****Purpose**

1. The Commission is invited to consider an analysis of its public consultation with Na h-Eileanan an Iar, Orkney Islands, Shetland Islands council areas to help inform its approach to the forthcoming public consultation with Argyll and Bute, Highland and North Ayrshire council areas due to commence in Autumn 2020.

Background

2. For the public consultation with Na h-Eileanan an Iar, Orkney Islands, Shetland Islands council areas, held from September – December 2019, the Commission wished to improve on the number of responses received during its 5th Reviews of Electoral Arrangements and to focus on digital engagement as a means to do this.
3. During the 5th Reviews the number of responses received during the public consultation stages was low with: 2 responses for Orkney Islands, 5 responses for Shetland Islands and 29 responses for Na h-Eileanan an Iar council areas.

Legislative Requirements

4. Section 18 (Procedure for Reviews) of the Local Government (Scotland) Act 1973 states the Commission must:
“..... (b) take such steps as they think fit for seeing that persons who may be interested in the review are informed of any draft proposals or any interim decision not to make proposals, and of the place or places where those proposals or that decision can be inspected;

(c) in particular, deposit copies of those proposals or that decision at the offices of the council of any local government area which may be affected thereby and require any such council to keep the copies available for inspection at their offices for a period specified in the requirement; and”
5. These are the only statutory requirements for the public consultation, with all other activity at the discretion of the Commission.

Public Consultation – Na h-Eileanan an Iar, Orkney Islands, Shetland Islands council areas

6. The Commission considered an engagement plan for its public consultation with the three island council areas at its meeting of 13 February 2019 (Paper 2473). That paper considered the use of: display points, household mailing, local press, video, local radio, roadshows, public meetings and meeting with community councils.
7. After considering all of the factors the Commission decided not to attend a county fair because Council’s advised there would be little public interest. Household mailing was also not pursued because of concern that many people adopt mailing preferences which would preclude a mail drop. The Chair attended a meeting with the Association of Shetland Community Councils and conducted an interview with BBC Radio Shetland.

8. APS designed a themed approach for the public consultation with the display posters, newspaper adverts and social media GIFs all following a similar style. These materials were used widely on Twitter and Facebook.
9. Although the Commission increased its use of publicity materials, interest in the reviews is arguably dependent on the amount of change the proposals present. In Orkney, for example, there was minimal change to the existing electoral arrangements and thus less interest than in the other areas.

Display Points

10. The Commission expanded both the number and variety of display points it had traditionally used (council offices and libraries). The Commission placed a display poster in the following locations:
 - Inter-Island ferries and terminals (2 in Orkney, 1 in Shetland);
 - Schools/colleges (17 in Orkney, 27 in Shetland, 24 in Western Isles);
 - Libraries (3 in Orkney, 2 in Shetland, 4 in Western Isles);
 - Council offices (3 in Orkney, 1 in Shetland, 5 in Western Isles);
 - Churches/mosques (21 in Orkney, 8 in Shetland, 16 in Western Isles);
 - Health centres (14 in Orkney, 9 in Shetland, 9 in Western Isles); and
 - Airport terminals (7 in Orkney, 7 in Shetland, 3 in Western Isles)
11. Although the Commission used approximately 180 display points, only one respondent to the public consultation, from Shetland, stated they had seen a poster.

Newspaper advertising

12. With a single publication in each of the council areas under review, the Commission trialled larger newspaper advertisements than usual. These included a half page advert in The Orcadian (£657), a full-page advert in The Shetland Times (£1,116) and a 4-page wrap in The Stornoway Gazette (£950). Historically the Commission has placed a small advertisements publicising its reviews under the Public Notices section of local newspapers.
13. Ten respondents, who submitted a response to the public consultation, stated they had seen a newspaper advertisement. (Orkney (2), Shetland (1) and Western Isles (7)).

Social media

14. The Commission expanded its use of social media advertising, and spent approximately £300 on Facebook advertising. Animated files (GIFs) were designed for social media use and included: a jigsaw puzzle (“we are reviewing ward boundaries in your area”); seesaw (“we want to make electoral wards in your area fairer”); and an alarm clock (consultation closing).
15. Social media, especially Facebook, proved to be the most cost effective method of publicising the reviews. Of those who submitted a response to the public consultation, the following stated they had seen an advert or link on social media: Orkney (21); Shetland (20); and Western Isles (24).
16. There were however some issues with using Facebook which on several occasions rejected or suspended advertisements for not complying with rules on political advertising. Some appeals against rejection were successful and others not and there appeared to be little consistency of approach. The challenging

background makes it difficult to provide a more sophisticated analysis of the impact of the advertising.

Guidance Booklet

17. The Commission produced a guidance booklet for all three council areas. The booklet provided a general background to the reviews for interested parties and was distributed to Councils and display points at Council offices and libraries.

Public consultation site

18. All of the publicity materials guided stakeholders to the Commission's consultation site where comments could be submitted and collated for each review. The following questions were asked via the consultation site:

Councillor Numbers

- Do you agree with the Commission proposals?
- Please provide reasons for your answer

Ward Boundaries

- Do you support the overall pattern of wards that the Commission has proposed?
- Please provide reasons for your answer

About You

- What is your name?
- What is your email address?
- Organisation type?
- How did you find out about the consultation?

19. Further information was available on the consultation site including: a web-map where the existing and proposed ward boundaries could be viewed at different map scales; a background to the review explaining 'why we are consulting'; and links to further information such as the Council's earlier response to the consultation, guidance booklet and news release.

20. The Commission undertook user-research on its consultation site and will wish to consider implementing the research's recommendations for the forthcoming public consultation.

21. All user-research participants found the overall functionality of the consultation platform simple to navigate but the recommendations included:

- clearer messaging to explain the importance of the review, the value of taking part in the consultation and the benefits that changes in ward boundaries can bring to the lives of those living in the regions. This will also help to drive engagement when communicating the consultation process to our audience through our advertising channels;
- simplifying the terminology for all audiences as some users are confused by the terms 'ward' or 'boundaries'. Users felt that the current wording was aimed at those highly engaged in this subject. Simplifying the terminology used will make the consultation process more accessible to users;
- provide more simplified and relevant information for each question to allow users to easily make an informed decision or response;

- simplify the boundary maps explaining what the existing and proposed ward boundaries are or by simply using an image of before and after with clearly marked changes; and
- consider a very low user knowledge. Guide users through the process and make it as simple as possible for them to participate.

Planned public consultation methods for Argyll and Bute, Highland and North Ayrshire council areas (Autumn 2020)

Timing

22. The legislation governing electoral reviews does not state the length of the public consultation, it is at the Commission's discretion. However Scottish Government guidelines recommend a 12-week period for public consultations. A 12-week consultation commencing on 5 November would conclude on 27 January 2021 and would overlap the Christmas/New Year period.
23. There are some timing pressures now because of delays in the review process following the outbreak of COVID-19 and a 12 week consultation period would exacerbate this. One option to manage this pressure would be to explore with Scottish Government colleagues whether there is any flexibility over when the Commission submits its recommendations to Scottish Ministers. Traditionally this would be May 2021, 12 months before the 2022 election. An alternative would be to reduce the 12 week period to 10 weeks or even 8 weeks.

COVID-19

24. The Commission will be aware of the continued uncertainty of local or national COVID-19 restrictions with any plans made by the Commission for the public consultation may be subject to change at short notice.

Display Points

25. Although few respondents to the earlier public consultation stated they saw the posters at display points, the numbers involved general in the islands make it hard to assess overall effectiveness.
26. The Commission will wish to continue publicising the review within public buildings such as council offices and libraries. The Secretariat will monitor changes to the opening of public buildings prior to the public consultation. At 1 October: Highland libraries were all open for a collect and return service; all Argyll and Bute libraries had a 'soft opening' from 31 August; but all North Ayrshire libraries remained closed.
27. The Secretariat can explore using alternative locations for display posters. During the public consultation for Na h-Eileanan an Iar, Orkney Islands and Shetland Islands council areas, the Commission used ferries, schools/colleges, places of worship and health centres.
28. During the earlier public consultation, display points proved to be the least effective method of gaining interest in the reviews. With limited access to public buildings due COVID-19 restrictions they might prove even less effective. However the use of display points allows the Commission to meet its statutory requirement.

Argyll and Bute Council Area Community Planning Group meetings

29. The Commission have been invited to virtually attend Argyll and Bute Council's November Area Community Planning Groups meetings. These are attended by community councils and would give the Commission an opportunity to present to community councils and take questions. There are over 50 community councils in Argyll and Bute.

30. The meetings are scheduled for the 3rd, 4th, 11th and 19th November but the Commission has still to confirm the start date of its public consultation. The Secretariat will liaise with Council Officers to confirm if the Commission wishes to attend all or some of these meetings.

Newspaper advertising

31. The Commission trialled large newspaper adverts within each council area because there was a sole newspaper within each council area. However in Argyll and Bute, Highland and North Ayrshire there are several newspapers in circulation and it would be costly to place a full page or 4-page adverts in several publications. Therefore the placement of smaller adverts in several publications may prove more cost effective.

32. The following newspapers have been identified as covering the most populated areas in each council area.

33. The Commission could also consider placing an interview style advert in newspapers re-enforcing facts about the review and avoiding any possible misinformation spreading.

Argyll and Bute	Helensburgh Advertiser (tabloid weekly) Readership 8,000	Campbeltown Courier (weekly) Readership 14,000	Oban Times (weekly) Readership 16,016
4 page wrap	£6,940 + VAT (see email as includes digital advertising)	£5,314.32 + VAT	£8,704.08 + VAT (330mm high x 250mm wide)
Full page	£3,476 + VAT (see email as includes digital advertising)	£1207.80 + VAT (330mm high x 250mm wide)	£2,176.02+VAT (330mm high x 250mm wide)
½ page	£2,760 + VAT (see email as includes digital advertising)	£603 + VAT (160mm high x 250mm wide)	£1,055.04+VAT (160mm high x 250mm wide)
¼ page	£2,360 + VAT (see email as includes digital advertising)	£301.95 + VAT (160mm high x 123mm wide)	£527.52+VAT (160mm high x 123mm wide)

North Ayrshire	Irvine Times (readership 4,344), Ardrossan and Saltcoats Herald (16,066), Largs and Millport Weekly News (6,299), (price for all 3 weekly tabloids)	Arran Banner (tabloid, weekly) Readership 9,000
4 page wrap	£7,100+VAT	N/A
Full page	£1,375 + VAT (320mm high x 259mm wide)	£926.64 (60mm high x 250mm wide)
½ page	£1,149 + VAT (259mm high x 114 mm wide)	£449.28 + VAT (160mm high x 250mm wide)
¼ page	£499 + VAT (160mm high x 114mm wide)	£224.64 + VAT (160mm high x 124mm wide)

Highland	Caithness Courier (weekly) readership 5,700. Sister paper – JOG Journal	The Inverness Courier (bi-weekly)	John O’Groat Journal (weekly) readership 7,300. Sister paper – Caithness Courier	Ullapool News (weekly)	West Highland Free Press (weekly)
4 page wrap	£3,200 + VAT	£4,800 + VAT	£3,900 + VAT	n/a	n/a
Full page	£1,536 + VAT (320mm x 250mm)	£2,560 + VAT (320mm x 250mm)	£2,048 + VAT (320mm x 250mm)	£30 + VAT (190mm x 270mm)	£1,280–£1,674 + VAT (310mm high x 266mm wide)
½ page	£960 + VAT (200mm x 250mm)	£1,600 + VAT (200mm x 250mm)	£1,280 + VAT (200mm x 250mm)	£20 VAT (190mm x 130mm)	£640–£810 + VAT (150mm high x 266mm wide)
¼ page	£480 + VAT (200mm x 124mm)	£800 + VAT (200mm x 124mm)	£640 + VAT (200mm x 124mm)	£10 + VAT (70mm x 190mm)	£320–£405 + VAT (150mm high x 131 mm wide)

Social Media

34. A number of GIFs were created for the public consultation with Orkney Islands, Shetland Islands and Na h-Eileanan an Iar council areas. These can be re-used for this review and future reviews. These GIFs included an alarm clock, jigsaw puzzle and seesaw.
35. The Secretariat are currently creating new council area specific GIFs for the forthcoming consultation as well.
36. During 2020 a number of organisations have cancelled Facebook and Instagram advertising in support of the “stop hate for profit” campaign. Scottish Government have used COVID-19 related social media advertising during 2020. Facebook proved to be the most popular method of publicising the islands-only reviews and the Secretariat will consult Scottish Government colleagues for advice and guidance on paid Facebook advertising.
37. The Secretariat will continue to make efforts to ensure that councils and other interested stakeholders share details of the consultation online and help to promote the Commission’s social media output.

Guidance Booklet

38. A booklet will be printed for Councils to explain the reviews and offer further information. A PDF version will be available to print on the Commission’s website and consultation site.
39. An updated draft guidance booklet is attached at Appendix A for comment.

Consultation site

40. Following user–research feedback, the Secretariat have been looking at the consultation questionnaire with a view to making it more user friendly. Options for this include simplifying text and the language used to share the Commission’s proposals, making it possible to comment on individual boundaries and councillor numbers at a ward level. Sub questions could also be included, especially for the Argyll and Bute consultation, where the Council have requested feedback on links between islands and the mainland. Further details could be collated from consultation respondents such as postcode so the Commission can identify any specific local issues.
41. A research company could facilitate further user–research to provide feedback on any updated questionnaire before the public consultation. This could ensure the questionnaire meets the aims of providing a simpler interface between the Commission and interested consultation participants.
42. While not considered in the user–research the Commission may also wish to gather further information such as a postcode or address to identify the location of those responding in an effort to gauge engagement from local electors.

News release

43. The Commission will publish a news release announcing the start of the consultation and include information supporting the proposals. The news release will be shared with key stakeholders (press, Councils, community councils, political parties, MSPs, MPs, COSLA etc). Depending on interest in the local press the Commission could agree to conduct interviews .

Other suggestions

44. The Commission may wish to publicise the Reviews on local radio stations. An interview could be conducted with STV News Radio, BBC Radio Highlands and Islands which covers Argyll and Bute and Highland and Westsound with coverage in Ayrshire. If the Commission agrees, the Secretariat will make arrangements for interviews with the Chair or other Commissioners.

Conclusion

45. The Commission is invited to review and reflect on the activity undertaken during the public consultation for Na h–Eileanan an Iar, Orkney Islands, Shetland Islands council areas before considering its approach for the forthcoming consultation with Highland, North Ayrshire and Argyll and Bute council areas.
46. The Commission is asked to confirm that it wishes to:
- advertise at more widespread display points, acknowledging limited audience due to COVID–19 restrictions and probable limited access to buildings ie libraries;
 - place smaller adverts in more newspapers;
 - advertise on social media within any government guidelines ;
 - comment on the updated Guidance Booklet;
 - comment on the Consultation Site, in particular the questions asked;
 - consider attending Argyll and Bute Council’s November Area Community Planning Groups meetings;
 - consider interviews or advertising on local radio networks; and
 - provide any other suggestions.