

March 2018



SCOVl submission to the Scottish Government's Consultation Paper on Electoral Reform

Introduction

SCOVl is the umbrella body for vision impairment in Scotland. Our members include individuals, groups and organisations with an interest in supporting people with vision impairments. Our vision is for a Scotland in which people with vision impairments live independent and included lives. We seek to achieve this by working in partnership with all those with an interest in delivering this vision.

We recognise that it is unlikely that a fool proof system of voting and democratic engagement can be delivered for all people with vision impairment as a consequence of this consultation, but we are convinced that current arrangements can be significantly improved. We therefore welcome the Scottish Government's Consultation on Electoral Reform and the particular consideration of accessibility of democratic structures and processes. We welcome, too, the different opportunities that our members have had to discuss this, including at the Scottish Parliament Cross Party Group on Visual Impairment in February 2018. We hope that these conversations will continue and will broaden out beyond electoral reform. We believe that, whilst well-run and inclusive elections are a crucial part of good governance, democracy is much more than just voting, and all aspects of Scotland's democratic processes and structures should be inclusive and accessible. To this end, we are keen to be involved in discussions around the 'Local Governance Review' launched by COSLA and the Scottish Government.

Responses to the Consultation Paper on Electoral Reform Questions

Given SCOVl's vision and remit, our response to this consultation focuses on questions that are of relevance to people with vision impairments. We have, therefore, limited our answers to questions 2, 3, 7, 8, 10, 12, 13, 14, 15, 20, 23 and 24.

Our responses are guided by the following principles:

- Voters should be able to cast their vote independently and in secret;
- Care and support workers need to know how they can best support the people they care for when they vote, without compromising the secrecy and independence of voting;
- All those involved in running elections must understand the needs of people with vision impairments so they can support them and make it easy for them to register to vote and to vote;
- Parties and candidates have a duty and responsibility to ensure information is available in good time and in easy to read formats;
- Accessibility of all election administration processes (forms, instructions, timetables, etc.) is key; jargon must be avoided, for example; and
- People with disabilities should have greater flexibility and choice in the way in which they vote and who can accompany them to vote should they choose to have someone with them.

QUESTION 2: Do you have any other comments or suggestions on term lengths?

SCOVl believes that steps should be taken to avoid clashes between elections to the Scottish Parliament and Scottish Local Authorities. One way of doing this would be to set the same term lengths for these two sets of elections, and have them at least two years apart.

These different elections have important and distinct policy issues which affect people with vision impairment and the services on which they rely. Debates on these different policy issues should take place separately to avoid any conflation or confusion, and to enable the appropriate level of focus and scrutiny of the separate proposals for the different levels of government.

These different elections also use different voting systems. Having different voting systems in use on the same day can cause unnecessary confusion: different sized ballot papers, template guides, etc. Keeping them completely separate will avoid all uncertainty and doubt, for polling staff as well as voters.

QUESTION 3: Do you agree that the Electoral Management Board and the Board's Convener should be given the same functions in relation to Scottish Parliament elections as they already have for local government elections?

Yes. It makes sense to have a single body coordinating both sets of elections organised within and across local authority areas. This allows for continuity of training, support, guidance and information, and the development of understanding of the needs of not only people with vision impairments, but all disabled people. Promoting best practice is part of the current remit of the Electoral Management Board, and such practice should be developed in a holistic and inclusive manner for all elections.

QUESTION 7: Do you have any other comments or suggestions about who should have the role of Returning Officer or how Returning Officers should be paid?

SCOVl has no specific view about who should have the role of Returning Officer or how they should be paid. We do, however, believe that it is vital that all those who take up the role of Returning Officer have a

thorough awareness and understanding of accessibility requirements for people with vision impairments. Thus, the person specification and job description for Returning Officers must include an understanding of these accessibility issues. In addition, appropriate information and training on accessibility, devised in conjunction with disabled people, should be compulsory for all Returning Officers.

QUESTION 8: Do you agree that candidates' addresses should not be required to appear on ballot papers for local government elections?

Yes. Disabled people are often disproportionately singled out and targeted for abuse, and the publication of home addresses might reduce the likelihood of disabled people putting themselves forward for election. SCOVl agrees that a candidate's link with their community is crucial to proper representative democratic engagement, but such links could be verified (by the Returning Officer, for example) in ways that do not put candidates at risk of having their privacy invaded or their safety threatened.

QUESTION 10: The Scottish Government would welcome views on this issue.

- **Do you agree that, in order to counteract the list order effect, a change should be made to the way in which candidates are listed on election ballot papers?**
- **If so, what form of new system would you favour: rotation; randomisation; alphabetical-reverse alphabetical? Any other?**

The consultation document acknowledges: "*There are concerns that moving away from alphabetical ordering may lead to additional difficulties for those who have difficulty reading, due to visual impairments ...*".

SCOVl's very strong preference is to retain alphabetic listing of candidates and would urge against moving away from this method. SCOVl acknowledges the concerns about 'list ordering' but considers the ability of people with vision impairments to undertake their democratic right to vote independently and in secret to be a principle that must not be jeopardised.

Alphabetical listing is important to people with vision impairments as it enables them to become familiar with the ballot prior to voting. It also makes it much easier to locate their preferred candidate(s) on the ballot paper at the time of voting. A new system would likely lead to confusion and would undoubtedly require to be more complex. This would not be beneficial for voters with vision impairments.

SCOVl believes that concerns about the list order effect are more of a problem for political parties and candidates than for voters. We also believe that these concerns could be overcome by clearer information being distributed by parties prior to the elections, and by better vote-management processes by parties during elections.

QUESTION 12: Voting Machines

- **Would you be happy to use an electronic voting machine in a polling place instead of a traditional ballot paper?**
- **Would you like voting to be possible on more than one day?**
- **Would you like to be able to vote at any polling place in Scotland?**
- **Do you have any other comments?**

SCOVl believes that the use of innovative assistive technologies could be transformational for people with visual impairments and their ability to vote independently and in secret.

However, there are already challenges in ensuring polling station staff can provide appropriate assistance with current technology, such as tactile voting devices, templates, audio plug-ins, etc. Therefore, any

technology used as part of the electoral process must be appropriately designed, taking advice from disabled people including those with vision impairments. It would be beneficial if people with visual impairments could familiarise themselves with any technological aids or tools prior to polling day. And all staff who might encounter voters who require to use such technology must have compulsory training to ensure they know how to support these voters.

SCOVl supports the development of different assistive technologies to increase voter participation, such as voice recognition as part of electronic voting systems. We would welcome further discussion and perhaps the piloting of different systems, involving disabled people, including those with vision impairments.

SCOVl supports the proposal to enable voting on more than one day. This would give all disabled people - not just those with vision impairments - an opportunity to vote earlier when polling stations might be less busy, and so give them more time to cast their vote with appropriate support from polling staff who would be under less time pressure.

SCOVl also supports the suggestion that voters be able to vote at any polling place. This would make it easier for vision impaired people to access appropriate transport to get to polling places that they know are familiar and therefore more accessible to them, and where they could be sure polling station staff had received awareness training to support vision impaired voters. However, the priority must be to ensure the accessibility of all polling places, with appropriate signage, in accessible buildings, where all polling staff have received the right training and advice.

QUESTION 13: Internet and Mobile Phone Voting

- **If internet or mobile phone voting was available, would you choose to use that rather than vote at a polling place or by post?**

- **If internet or mobile phone voting was available, would you be more likely to vote?**
- **Would you like voting to be possible on more than one day?**
- **Do you have any other comments?**

SCOVl is supportive of methods designed to increase voter participation and would be keen to explore online voting. Several of our member organisations provide training to people with vision impairments on using digital technologies which can help them read documents, go online and use audio and other assistive technologies. Such training could easily be tailored to cover online voting.

SCOVl has some concerns about digital exclusion if online voting were to replace completely voting in-person at polling places or by post.

As stated in response to Question 12 we believe voting should be possible on more than one day.

QUESTION 14: Do you think that we should move to a rolling programme of reviews of local government electoral arrangements?

SCOVl has no strong view on the timescales for reviews of local government electoral arrangements. Whatever programme is in place, however, it is vital that people with vision impairments have the same opportunities as everyone else to contribute to the decision-making processes, be informed about proposals, and have their voices heard.

QUESTION 15: Independence of boundary reviews

- **Should Scottish Ministers be able to change the recommendations of the Local Government Boundary Commission for Scotland on Scottish Parliament constituencies and council wards?**

- **Should the Scottish Parliament be able to challenge the recommendations of the Boundary Commission on Scottish Parliament constituencies and council wards?**
- **Should the recommendations of the Commission be implemented without change?**
- **Please comment on your answer.**

SCOVl has no strong view on this issue. However, all decisions should be open and transparent, and the discussions that lead up to these decisions must include the voices of people with vision impairments.

QUESTION 20: Do you think that we should make it easier for individuals who may be at risk from any form of abuse to register anonymously, whilst maintaining the integrity of the electoral register?

Yes.

QUESTION 23: What other action could the Scottish Government take to widen access to and remove barriers to voting and elected office?

SCOVl welcomes the Access to Elected Office Fund (Scotland), which provided support to disabled people standing for elected office. This Fund supported 44 potential candidates, of whom 39 were selected as candidates and 15 were successfully elected. These individuals were able to access support for accessible transport, communications, confidence building, and much more. We would encourage the extension of this fund, and its expansion to cover all elections in Scotland in future.

SCOVl believes that active citizenship and democracy should be a core part of the formal education system, and would encourage the inclusion of dedicated and protected time on these topics in primary and

secondary education. For young people with vision impairments to make the most of such education, they must be supported by teachers with qualifications in vision impairment. The number of QTVI teachers (Qualified Teachers of Children and Young People with Vision Impairment) across Scotland has been declining, despite the commitment to including young people with vision impairments in mainstream education and the increasing need for specialised support. This trend must be reversed if Scotland's children and young people with vision impairments are to be included and active citizens.

SCOVl also believes that democracy must be more than just participating in elections. People with vision impairments should be able to be involved in decision-making in their communities, places of work, and places of learning, as well as in the formal local and Scottish elections. There is still much work to be done to make society truly inclusive for all disabled people, including those with vision impairments.

QUESTION 24: As well as the above arrangements, is there anything else that could be done to increase the accessibility of elections?

Further to the comments above at Question 23 regarding the inclusion of genuine active citizenship and democracy education in the school curriculum and the adequate training of and resourcing for QTVIs, and the answers to previous questions, SCOVl would like to highlight the following points.

SCOVl urges the Scottish Government to lift the restrictions/limits on who can support voters: voters should be able to choose who can accompany them and support them to vote, so that they feel comfortable and at ease when exercising their right to vote.

SCOVl would welcome further discussions on how the information about people with vision impairments collected and held as part of the

registration process might be used to better target training, support and resources. For example, are there ways that the new Certificate of Visual Impairment process (using the CVI form that will be launched on 1st April 2014) could be used to identify people with specific access needs? Such people could perhaps then receive targeted training on electoral processes (such as practice time with assistive technologies), or even get tailored voting instructions or systems. The appropriate Data Protection processes and issues would need to be considered, but SCOVI believes there is scope to make better use of data to support and encourage democratic inclusion.

Training should be provided for people with vision impairments on all assistive technologies used in elections prior to polling day. Several SCOVI members would be able to assist with such training, but it should be resourced appropriately by the Scottish Government. Resources for the training and education for people with vision impairments about the support for electoral processes to which they are entitled (so they do not have to fight for their entitlements) should also be provided.

Care and support workers who work with people with vision impairments should have access to training so that they understand what supporting someone to vote entails, and what disabled people are entitled to with respect to access and support at polling stations.

The training that returning officers, polling station staff, and all others involved in running and managing elections must include proper awareness of the needs of vision impaired voters. Experience tells us that the current training is limited and not really focussed on disabilities, and that not all electoral staff understand what should be available for people with vision impairments. One suggested approach would be for staff to complete mandatory online training (including simulations of different scenarios taken directly from disabled people) covering disability and accessibility before moving on to further training.

Postal voting is often a suitable alternative to attending a polling place for many disabled voters. However, experience shows that many people

with vision impairments cannot easily make use of this alternative. SCovi would welcome the simplification of the postal voting process, and easier access to accessible formats for both electoral information and ballot papers.

Political parties and candidates need to acknowledge their duty to provide and take responsibility for supplying information about candidates, manifesto commitments, voting instructions, etc. in accessible formats and in time to be of use (i.e. not just the day before polling day).

In conclusion, SCovi would like to stress the importance of listening to and learning from people with visual impairments themselves. Their stories and personal experiences must be central to the development of strategies, processes, systems, training and support to increase the accessibility of and inclusion in voting and wider democratic processes.

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