Request for Greater London Returning Officer (GLRO) Decision – GLRO 21-03

Title: Marketing campaign for the 2021 Mayor of London and London Assembly elections

Executive Summary:

<u>GLRO-20-10</u> approved expenditure of up to £450,000 to deliver an integrated marketing communications campaign designed to tell Londoners how, when and where to vote at the in the Mayor of London and London Assembly elections scheduled for 7 May 2020.

Due to the Covid-19 pandemic, the 2020 elections were postponed by 12 months and a revised statutory timetable agreed, with a new election date given as 6 May 2021. At the point the election was postponed, the campaign had been live for less than a week. However, we had already carried out full creative development and production, including research; production of assets and a content calendar for organic social media; set our media strategy and booked media space. Some of these costs cannot be recouped.

This form seeks the GLRO's approval for additional budget to cover that spent on the 2020 election, where these costs cannot be recouped, or the work preserved.

In the first instance expenditure will be met from Election's reserve budget.

Decision:

That the Greater London Returning Officer (GLRO):

• Approves further expenditure of up to £85,000 to cover the costs incurred on our 2020 public awareness campaign

This will result in a total 2021 campaign budget of \pounds 450,000 – the same as the budget set for the postponed 2020 election public awareness campaign (approved in GLRO 20-10) plus \pounds 85,000 to cover costs incurred on the 2020 Elections.

The integrated marketing communications campaign will deliver two goals:

- To raise awareness among the London electorate that the Mayor of London and London Assembly Elections are taking place on 6 May 2021
- To explain the voting process among the London electorate, building understanding about how, when and where to vote.

The exact amount to be spent on the campaign is subject to the GLRO being satisfied with the campaign proposal to reach London voters.

Greater London Returning Officer

The above request has my approval.

Signature

Date

Mayderle

13 November 2020

PART I - NON-CONFIDENTIAL FACTS AND ADVICE Decision required – supporting report

1. Introduction and background

- 1.1. Section 69 of the Electoral Administration Act 2006 (EAA) introduced a duty on Electoral Registration Officers and local government Returning Officers (including the GLRO) to take such steps as s/he thinks appropriate to encourage the participation by electors in the electoral process in the area for which s/he acts.
- 1.2. The GLRO has no responsibility in respect of electoral registration (this rests with Borough Registration Officers and the Electoral Commission) but will fulfil the duty above by providing the London electorate with information on when, where and how to vote and on the roles of the Mayor of London and London Assembly. This will be carried out in part by the Mayor of London and London Assembly marketing campaign.
- 1.3. The campaign will be planned and delivered to ensure balance, defined as reaching London voters across various populations, demographics and communities in a proportionate and cost-effective way.
- 1.4. Balance will be achieved by selecting a media mix that reaches a base profile of London adults which does not favour any one group over any other. GLA- and TfL-owned assets will be taken as a starting point and additional media purchased to ensure all groups are reached in broadly equal amounts.
- 1.5. We will work closely with our media planning and buying agency to confirm campaign media channels. Potential media channels include, but are not limited to, outdoor media including GLA poster assets (gifted from TfL), radio advertising, digital display advertising, social media (advertising and organic content) and search (pay-per-click) advertising.
- 1.6. Cost effectiveness will be achieved using in-house marketing and creative services, by maximising use of free GLA and TfL assets, and by working with local authorities and other relevant organisations to extend the reach of the campaign.
- 1.7. Campaign planning work is being done with the GLA's contracted media planning and buying agency (Wavemaker) to ensure most of London's electorate are reached via the campaign, in line with the reach delivered via the 2016 marketing campaign, and the projected reach of the 2020 marketing campaign. The media landscape of 2021 is likely to look quite different depending on the circumstances of the COVID-19 pandemic. We will not know exactly what these will be until close to campaign launch, so will plan with multiple scenarios to ensure the best reach and value for money possible.
- 1.8. The exact amount to be spent on the campaign is subject to the GLRO being satisfied with the campaign proposal to reach London voters.
- 1.9. In 2020 £84,837 was spent on the following:
 - paid media space £12,278;
 - creative development research £9,800;
 - creative production £32,792;
 - social media content: £22,817; and

- contingency £7,150 (website development, photography and printing).
- 1.10. As part of our creative development we will look at re-using or adapting assets which have been created already. However, our 2020 campaign creative and our social media content were heavily based on the idea of polling stations and voting in person. As such this may not be appropriate when social distancing measures are in place, or if we are seeking to promote postal voting in order to reduce the footfall at polling stations.
- 1.11. If we were to use content already created for 2020, we would still need a substantial production budget as most of the production costs relate to printing and posting of posters (£28,200 in 2020), rather than creative development. There would also be costs involved in updating content with the new election date, such as re-recording our radio ad.
- 1.12. Our 2021 costs may be higher than for 2020:
 - If public transport use continues to be low due to COVID-19, we will be able to rely less on our TfL advertising (which we receive from TfL at no cost to London Elects) to achieve a similar level of reach and may need more paid-for media to cover the shortfall.
 - We are exploring the prospect of a longer campaign in order to avoid an influx of late postal voter application forms ahead of the deadline (20 April).
- 1.13. Due to the current economic climate we are not requesting a higher budget than that of 2020 and will instead explore ways to make our existing budget go further. GLRO 20-10 made provision for a media spend of up to £350,000 if needed, but our media plan at the time of campaign launch was £300,000 with the remainder being held as contingency. We therefore have some leeway in place if needed. We are also exploring the option of creating our social media content in-house.

2. Objectives and expected outcomes

- 2.1. The objectives of the campaign are as follows:
 - to raise awareness among the London electorate that the Mayor of London and London Assembly Elections are taking place on 6 May 2021; and
 - to explain the voting process among the London electorate, building understanding about how, when and where to vote, and the roles of the Mayor and Assembly.
- 2.2. Campaign key performance indicators will be set during the media planning process with metrics and stretch metrics.

3. Other considerations

- a) Key risks and issues
- 3.1. **COVID-19**: The key risk for the 2021 elections is the uncertainty created by COVID-19. Depending on how the pandemic progresses there is the possibility of changes to the way the election is run close to the launch of the campaign, presenting significant risk of voter confusion. We plan to mitigate this by building flexibility into our plans, so that messages can be easily updated at short notice if need be.
- 3.2. **Electoral Commission campaign**: The Electoral Commission has a duty to encourage voter registration among the electorate. The Electoral Commission will run a national advertising campaign to raise awareness that people need to register to vote. Depending on the situation with the COVID-

19 pandemic, they may also seek to provide further information on new voting requirements or promote postal voting. It is likely that the London Elects marketing campaign will be live at the same time as the Electoral Commission campaign. London Elects will work closely with the Electoral Commission to ensure as far as possible that the campaigns do not conflict and messaging for each is clear and distinct.

- 3.3. **Working with boroughs**: In 2020 we sought to maximise the reach of our campaign by providing a toolkit to boroughs including our campaign resources and template messaging. In 2016 there was some confusion around the role of London Elects (voter information) and the Electoral Commission (voter registration) and how boroughs should use two sets of resources together.
- 3.4. We sought to mitigate this in 2020 by issuing a joint toolkit with the Electoral Commission which explained how to use the two sets of assets together. However, due to the December 2019 general election we were not able to consult boroughs to the extent we would have liked. For 2021 we will seek to consult boroughs to a greater extent, so that the toolkit we provide best meets their needs.
- 3.5. **Reputation**: There is a reputational risk for London Elects in delivering a marketing campaign. It is essential that the campaign is perceived as being unbiased. All organisations and teams, such as the media agency and in-house creative team, will be fully briefed on this to ensure political impartiality. Creative testing and creative approval by the GLRO will also help to mitigate this.

Campaign timings

- 3.6. We estimate that the marketing campaign will run for circa eight weeks during the run up to polling day. Exact timings and phasing will be confirmed during campaign planning in consultation with the GLA's contracted media planning and buying agency.
- 3.7. Media booking deadlines for the campaign are in February 2021 for a mid-March 2021 live date. A brief to the media agency will be issued as soon as possible and budget approval is required before this can take place.

4. Equality comments

- 4.1. Under section 149 of the Equality Act 2010, as a public authority the GLA must have due regard to the need to eliminate discrimination, harassment and victimisation, and any conduct that is prohibited by or under the Equality Act, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.
- 4.2. The construction of the campaign will take into consideration the audience which the campaign is aimed at. In every case, materials are assessed to ensure they are fully accessible and in line with the public sector equality duty.

5. Financial comments

- 5.1 GLRO approval is being sought for agreeing further expenditure of up to £85,000 to cover the costs incurred on the 2020 Elections public awareness campaign. These costs are outlined in paragraph 1.9 above and are the costs incurred at the point at when the Elections 2020 has been postponed to May 2021.
- 5.2 This brings the total budget and expenditure approval for Elections marketing and public awareness campaign to up to £535,000 (original budget approved to up to £450,000 approved under GRLO 20-

10 plus the new budget of £85,000). The budget of £535,000 takes account of the value of spend to date (including sunk/ abortive costs- £85,000), original budget and some contingency budget.

5.3 The cost of the marketing and public awareness campaign to up to £535,000 will be charged to the Elections budget and reserve in the first instance. This is in line with MD2695 that approved £10m allocated from GLA Group reserves to Elections reserve.

6. Legal comments

6.1. The proposals in this Form are consistent s 69 of the Electoral Administration Act 2006 and her duties as GLRO generally.

7. Planned delivery approach and next steps

Action	Timescale
Issue creative brief	August 2020
Issue media brief	August 2020
Creative team response to brief	September 2020
Wavemaker response to brief	September 2020
Creative development testing	September/October 2020
Media strategy approved	October 2020
Creative production	October-December 2020
Media booking	January 2021
Creative supply to media owners	February 2021
Campaign launch	March 2021
Deadline for candidate withdrawals (candidates finalised)	30 March 2021
Voter registration deadline	19 April 2021
Postal voting application deadline	20 April 2021
Polling day	6 May 2021

Appendices and supporting papers:

None

Public access to information

Although the GLRO is not subject to the Freedom of Information Act 2000 (FOI Act), the information in this form will be published on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it will be deferred until a specific date. Deferral periods will be kept to the shortest length strictly necessary.

Note: This form (Part 1) will either be published within one working day after approval <u>or</u> on the defer date.

Part 1 Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

If YES, for what reason:

Until what date: (a date is required if deferring)

Part 2 Confidentiality: Only the facts or advice whose publication may be prejudicial or commercially sensitive should be in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:	Drafting officer to confirm the following (\checkmark)
Drafting officer: <u>Alex Chafey</u> has drafted this report in accordance with GLA procedures and confirms that the <u>Finance and Legal</u> teams have commented on this proposal as required, and this decision reflects their comments.	~
The Deputy GLRO has reviewed the request and is satisfied that it is correct and can be referred to the GLRO for approval	~

EXECUTIVE DIRECTOR, RESOURCES:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature

D. Goue

Date 21 September 2020