



# HOUSE OF LORDS

## **SELECT COMMITTEE ON THE CONSTITUTION**

### **Referendum on Scottish independence: draft section 30 order and agreement**

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## Written evidence – The Electoral Commission

### Review of the referendum question

- I. **What adaptations, if any, does the Commission contemplate to your standard process of review of the proposed referendum question and any statement that precedes the question? Do you consider that you will have the necessary time and resources to perform the tasks effectively and efficiently?**
- I.1 We do not propose to adapt our preferred approach to assessing referendum questions. Our aim is to look at a proposed question (and any preceding statement) from the perspective of voters, to see if it is written in a way that means they are likely to understand it and understand how to answer it.
- I.2 We have published question assessment guidelines that set out the criteria we will use. As for all other referendum questions we assess, we will consider whether the proposed question for the Scottish referendum presents the options clearly, simply and neutrally. We will look at whether it:
  - is easy to understand
  - is to the point
  - is unambiguous
  - avoids encouraging voters to consider one response more favourably than another
  - avoids misleading voters
- I.1 As well as looking at the question ourselves, we will gather evidence to help our assessment. This will include undertaking research with potential voters in focus groups and one-to-one interviews.
- I.2 We will take advice from experts on accessibility and plain language. We will also gather views from people with an interest in the outcome of the referendum, such as political parties, campaigners and relevant organisations, academics and individuals.
- I.3 At the end of the process, we will publish our assessment, along with the research report and a summary of the other evidence we have gathered. This is our standard process which we do not propose to adapt for the referendum in Scotland.
- I.4 As we said in our consultation responses, given sufficient advance notice it is possible to carry out a thorough, evidenced assessment; analyse the findings; and report on the intelligibility of a proposed referendum question in 12 weeks.
- I.5 We are ready to undertake the assessment now. We therefore believe that we will have the necessary time and resources to carry out the assessment effectively and efficiently.
- I.6 If we receive the referendum question from Scottish Government during November, we will be able to complete our preferred approach to assessing questions and prepare our report in time for the Scottish Parliament to consider our recommendations in the context of the Referendum Bill.

- 1.7 Further information on the resourcing of our question assessment work can be found in Section 9.
- 2. What assurance can you give the Committee that the Commission will provide candid and fearless advice on the wording proposed by the Scottish Government?**
- 2.1 The Commission is an independent organisation with a duty to comment on the intelligibility of referendum questions. We always provide our advice and recommendations to Governments, Parliaments and Assemblies in an open and transparent way, in the interests of transparency and voter understanding and participation, and we will do the same in respect of this referendum.
- 2.2 In recent years we have assessed a number of referendum questions for local and national referendums and in each case we have made clear and specific recommendations for changes to the questions, based on the evidence of our assessment, with the purpose of ensuring that referendum questions are clear, simple and neutral.
- 2.3 For the Wales referendum in March 2011 we recommended a significant re-draft of the proposed question and preamble. For the UK-wide referendum in May 2011 we recommended changes to improve the question wording and structure. And we recommended changes to the language and structure of proposed questions for Neighbourhood Planning Referendums in England to make them simpler, clearer and more concise. In each of these cases our recommendations for change were accepted by the relevant Government and the revised questions were subsequently approved by the relevant Parliament/Assembly.
- 2.4 Our December 2011 report on proposed question for referendums on council tax increases in England recommended improvements to the wording to aid voter understanding and reduce the risk of bias. The Government accepted the majority of our recommendations, but disagreed with one particular aspect of our proposed revised wording because in their view it did not accurately reflect the policy. The Government therefore made its own revisions to the question wording with the result that the question eventually included in draft regulations laid before Parliament was substantially different to the proposed question on which we were originally consulted. It contained some words that we were concerned could cause confusion for voters, based on our research findings. And because this specific question had not been tested with voters or plain language experts, it was not possible to assess properly whether it was clear, simple and neutral.
- 2.5 When the draft regulations were laid we therefore expressed our concerns to Parliament and secured a commitment from the Government to work with us to agree a revised question that addressed our respective concerns, which has since happened. We were consulted on revised wording in September 2012, which we were content with and we understand that draft regulations containing that revised question wording will shortly be laid before the UK Parliament.

- 2.6 As we have said in response to question 1, it is our standard practice to publish our assessment including any recommendations, along with the report or our research with voters and a summary of the other evidence we have gathered. The Agreement between the UK and Scottish Governments, made on 15 October 2012, makes clear that our report will be laid before the Scottish Parliament. It is our standard practice to brief the relevant Parliament or Assembly on our views to ensure that our impartial and independent advice is available to inform their consideration of proposed referendum questions.

#### Franchise

- 3. The intergovernmental Agreement gives the Scottish Government the option to propose extending the franchise to allow 16 and 17 year-olds to vote in the referendum. We note that in your response in March to the two consultation papers the Commission raised a range of concerns about the practicalities of this proposal. Especially in light of the First Minister’s announcement concerning “a paving Bill”, what do you now consider to be the major challenges in this regard?**

- 3.1 The Electoral Commission does not take a view on the appropriate franchise for elections and referendums – it is for the relevant Parliament to consider and approve legislative proposals introduced by government. For the benefit of both electors and campaigners, however, the franchise needs to be clear and the process for registering to vote should be as straightforward as possible.
- 3.2 In our response to the Scottish Government’s consultation earlier this year we identified some apparent discrepancies between the stated intention of extending the franchise to all those aged 16 and 17, and what is currently possible within existing UK electoral legislation. We recommended that the Scottish Government should set out more clearly how it would give effect to its proposed policy.
- 3.3 We will closely scrutinise the Scottish Government’s proposed paving Bill, which it intends will allow all 16 and 17-year olds to be included on the electoral register in time for the referendum, to ensure that it does give effect to this proposed policy. Any changes to the legislation for registering electors should be made in time so that the detailed rules are clear for Electoral Registration Officers at least six months before commencing the relevant annual canvass of households.

#### Functions of the Electoral Commission and the Electoral Management Board

- 4. Paragraphs 12-15 of the intergovernmental Agreement provide for a division of labour between the Commission and the Electoral Management Board (EMB). Do you anticipate any particular challenges in this regard? What assurance can you give the Committee about cooperation between the Commission and the EMB?**

- 4.1 The Commission has championed the development of the EMB since 2008. We consider it to be a robust mechanism for the co-ordination of Scotland’s electoral processes.

- 4.2 The EMB is now well-established in Scotland and in our opinion it has improved administration and produced greater consistency and co-ordination of electoral administration. We believe that the Convener of the EMB is best placed to co-ordinate the administration of the proposed referendum by Counting Officers in Scotland.
- 4.3 The proposed division of responsibilities broadly reflects the arrangements which were in place and worked well at the recent local government elections in Scotland, where the EMB was statutorily required to co-ordinate the administration of the elections and the Commission gave guidance to campaigners, undertook a public awareness campaign and reported on the conduct of the poll.
- 4.4 As we noted in our response to both governments' consultations on the referendum, we believe that it should be for the Chief Counting Officer (CCO) to issue guidance to counting officers at the referendum not the Commission. However, we will offer the CCO our full support and experience and share any of our existing guidance materials, templates and resources.
- 4.5 There may be areas of overlap where a joined up approach from the EMB and Electoral Commission will be desirable. For example, guidance for campaigners will need to cover both the campaign finance rules and electoral administration matters and it may be beneficial to campaigners to have one set of guidance covering all aspects, as opposed to two separate streams of guidance.
- 4.6 To ensure consistency of voter information there may also be benefit from ensuring that Commission's public awareness campaign is dovetailed with Counting Officers local awareness activities. We will have early discussions with the EMB to identify and plan for those areas where a joint approach would be appropriate.
- 4.7 The Commission has had a close working relationship with the EMB since its establishment in 2008 and we act as advisors to the Board. We believe it is best placed to co-ordinate the delivery of the referendum in Scotland and to help it in that role we will share with it the learning and resources we gained from our experiences of running both referendums in 2011 and provide any other additional support that we can.
- 5. Are you satisfied that the EMB will have adequate resource and expertise to deliver its responsibilities effectively? Are you satisfied that the EMB is (and is manifestly capable of being seen as being) sufficiently independent of Government?**
- 5.1 As noted above, the EMB had a statutory responsibility to co-ordinate the administration of the 2012 local government elections in Scotland. It also carried out this role on a non-statutory basis for the 2009 European Parliament elections and the 2011 Scottish Parliament elections.
- 5.2 The EMB will need to build its capacity and draw in additional resource in order to deliver the Scottish referendum. We are already in discussions with it about the resources we required to successfully deliver the two referendums in 2011 and we will support it to identify and secure its resource requirements for the Scottish referendum.

- 5.3 We also intend to publish an interim statement on preparedness for the referendum in autumn 2013, before the Bill reaches Stage 3 in the Scottish Parliament, and this would include our views on the preparedness of EMB to deliver.
- 5.4 The EMB was originally established in response to the problems which emerged during the 2007 Scottish elections. In the Commission's review into the elections, Mr Ron Gould identified the fragmentation of roles and responsibilities for operational administrative decisions as a significant contributory factor.
- 5.5 The development of the EMB was designed to ensure that those tasked with administering elections had strong and independent leadership to ensure that decisions on operational matters were taken by those tasked with administering elections and in the best interest of voters.
- 5.6 Consequently, we are confident that the EMB is sufficiently independent of Government. We have also recommended that the CCO be appointed by and accountable to the Scottish Parliament as opposed to Ministers.

#### Spending limits

**6. Paragraph 27 of the intergovernmental Agreement confirms that the Electoral Commission will have a significant role in advising on spending limits for the independence referendum. What is your current thinking on the appropriate limits?**

- 6.1 In 2010 the Commission set out the principles that inform its advice on the campaign spending limits for referendums.
- 6.2 Those principles are that the limits should: allow effective campaigning for all outcomes in a referendum; deter excessive spending; and should not be set so low as to distort reasonable campaigning and affect transparency (for instance, by giving campaigners an incentive to split their spending between multiple campaign bodies).
- 6.3 In March this year we set out our initial views on the Scottish Government's consultation proposals for campaign spending limits.
- 6.4 We will now review the evidence from the Scottish Government's consultation responses and will talk to prospective campaigners before setting out our further advice on spending limits for the Scottish referendum.

**7. Do you consider it satisfactory that only the last sixteen weeks of what will be a two-year campaign will be regulated in terms of campaign finance?**

- 7.1 In March this year we set out our initial views on the Scottish Government's consultation proposal that the regulated "referendum period" should run for 16 weeks.
- 7.2 We are monitoring developments in campaigning, and if we consider it appropriate to do so we may offer further views on the length of the referendum period to the

Scottish Government, the Scottish Parliament and other interested bodies in due course.

#### Referendum Rules

**8. Are you satisfied that the detailed referendum rules for this referendum are to be made subject to full and open consultation with you?**

- 8.1 We expect to be fully consulted on the draft referendum rules and we will set out our detailed views on the legislation when it is introduced to the Scottish Parliament.
- 8.2 The draft referendum rules were published as part of the draft Referendum Bill which was annexed to the Scottish Government's consultation on this subject. Our response to the consultation highlighted several areas where we considered the Bill needed to be amended.

#### General

**9. Are there any other matters arising out of the Scottish Government's February 2012 Draft Referendums (Scotland) Bill which we should bring to the attention of Parliament before it considers the draft section 30 Order?**

#### Individual Electoral Registration

- 9.1 There needs to be clarity about when the annual canvass will take place before the referendum. Under its proposals for implementing Individual Electoral Registration (IER) in Great Britain, the UK Government has suggested delaying the next annual canvass to spring 2014. This would mean that the electoral register for a referendum held in October 2014 would be more up-to-date than if the canvass was not moved.
- 9.2 The Commission has welcomed the proposal to delay the canvass to spring 2014, which we believe will also provide an up-to-date basis for the transition to IER; we would welcome confirmation from the UK Government that it intends to provide for this change in the relevant secondary legislation.
- 9.3 Both the Scottish and UK governments – together with EROs and the Electoral Commission – will also need to consider carefully the wider implications of the introduction of IER for participation in the Scottish referendum.
- 9.4 In particular, the timing of electoral registration activities during 2014 as currently proposed by the UK Government would mean that some electors who are currently registered as absent voters would need to re-register by providing their personal identifiers (date of birth and National Insurance number) in order to retain their postal or proxy vote.
- 9.5 Specific communications strategies are likely to be required to ensure electors in Scotland understand what they need to do in order to ensure they are registered and can vote at the referendum using the method of their choice.

## **Electoral Commission Funding**

- 9.6 The Electoral Commission is funded through the Speaker's Committee for its activities under the Political Parties, Elections and Referendums Act 2000 (PPERA), an arrangement designed to emphasise the Commission's independence from Government. For the same reason the Commission would expect to be funded by the Scottish Parliament for its referendum related activities.
- 9.7 The draft Bill issued for consultation in January 2012 provided that Scottish Ministers would reimburse the Commission for any expenditure incurred in the exercise of the Commission's functions under the referendum legislation. The Scottish Government have now confirmed that, subject to discussions between the Scottish Government and Parliament, they agree that the Commission should be funded through the Scottish Parliament (with the Government reimbursing the Parliament's Corporate Body). The Referendum (Scotland) Bill is now expected to contain specific provision to ensure that the Commission is funded by the Scottish Parliament for its statutory functions.
- 9.8 However, given that the Referendum (Scotland) Bill will not receive Royal Assent until the end of 2013, we accept that alternative arrangements will be necessary to fund Commission expenditure before that time. The Scottish Government will, for practical convenience, therefore reimburse the Commission directly for its forthcoming work on testing the referendum question.
- 9.9 The Commission understands the reasons for this pragmatic approach, which we do not believe will jeopardise our approach to question assessment, as we will report our findings directly to the Scottish Parliament. It will also have no practical impact on how we conduct the question assessment.

November 2012



## Written evidence - Electoral Management Board for Scotland

### PURPOSE

This paper provides responses to a series of questions been posed by Constitution Committee of the House of Lords. The Committee is scrutinising recent Agreement between the UK Government and the Scottish Government on a referendum on independence for Scotland (the “Edinburgh Agreement”) and the draft Scotland Act 1998 (Modification of Schedule 5) Order 2013.

The Agreement and the draft order anticipate a significant role for the Electoral Management Board for Scotland in the planning and delivery of the Referendum, an event which the Committee recognise as a major constitutional matter.

### BACKGROUND

#### The Electoral Management Board for Scotland

The Electoral Management Board for Scotland (EMB) was created by the Local Electoral Administration (Scotland) Act 2011. This gave the Board “the general function of **co-ordinating the administration** of local government elections in Scotland,” with two specific roles:

- (a) assisting local authorities and other persons in carrying out their functions in relation to local government elections; and -
- (b) promoting best practice in local government elections by providing information, advice or training (or otherwise)

The Board is composed of 8 members, 5 of whom are Returning Officers (or their Deputies) and 3 of whom are Electoral Registration Officers. These are appointed by a Convener who is in turn appointed by Scottish Ministers, through a process of open competition. Advisors from the professional associations working in electoral administration, SOLAR and the AEA, also attend the Board meetings. The Electoral Commission, the Scottish Government, Scotland Office and COSLA also have representatives at Board meetings acting as official advisors to provide support and advice.

The EMB’s prime focus is ensuring that the interests of the voter are kept at the centre of all elections planning and administration. The Board makes much use of the close community of electoral professionals in Scotland to operate by consensus wherever possible. However, the Convener also has the power to issue directions to Returning Officers and Electoral Registration Officers in relation to their duties around local government elections.

## **The Interim Electoral Management Board for Scotland**

The EMB was set up on an *interim* basis in November 2008 as an initiative of the four professional associations responsible for electoral activity in Scotland – SOLAR, the SAA, SOLACE and the AEA. The establishment of the Board was actively supported and promoted by the Electoral Commission in Scotland.

This Interim Board was a reaction by the electoral community to the issues that arose in the delivery of the elections of May 2007 when the Scottish Parliamentary Elections were combined with the Local Government elections. In particular, it was a response to the issues identified in the Electoral Commission's report ***Electoral Administration in Scotland 2008*** which in itself was the end of a deliberative process of review following those polls.

Operating on clear principles of promoting a consistent national approach to electoral administration and simplifying decision making - both aiming to ensure that the interests of voters were kept at the heart of all electoral activity – the IEMB supported the Regional Returning Officer for Scotland in the delivery of the European Parliamentary Elections in 2009. It also offered support in terms of common forms and other guidance for the UK Parliamentary Elections in 2010. In 2011 the IEMB supported the Regional Counting Officer in the delivery of the UK Referendum on a voting system for the Westminster Parliament which, in Scotland, was combined with the Scottish Parliamentary elections.

## **The Local Electoral Administration (Scotland) Act 2011**

In 2011 the EMB moved on from its interim state on the basis of The Local Electoral Administration (Scotland) Act. The aim of the Act was to continue the process of improving electoral administration following the difficulties faced in the 2007 combined local government and Scottish Parliamentary elections. The Bill established the Electoral Management Board for Scotland on a statutory basis for its work in relation to local government elections in Scotland, provided for the convener of the Board to be appointed by Scottish Ministers and created a power of direction for the convener over local Returning Officers and Electoral Registration Officers.

The Act further required that the Board prepare and submit to Parliament an annual report on the carrying out of its functions. This allows scrutiny of the work of the Convener and Board by Parliament, but preserves the independence of arrangements for delivering the administration of elections in accordance with the legislative framework.

## **Performance of the EMB**

Following the May 2012 elections the Board consulted with various stakeholders to assess its performance. This included suppliers, the Electoral Commission, Returning Officers and Electoral Registration Officers. There was broad and deep support for the EMB across all those consulted and a significant appreciation for the EMB's work. This is summarised in the report which is to be submitted to the Scottish Parliament shortly.

The Electoral Commission's report on the May 2012 elections draws attention to the EMB's role:

*“89% of voters were confident that the Scottish council elections on May 3 were well-run. 98% of people who voted at a polling station said they were very or fairly satisfied with the process. A similar proportion of postal voters (97%) were very or fairly satisfied.*

*The Electoral Management Board for Scotland had a new duty at these polls to co-ordinate the administration of the elections. The report finds that the work undertaken by the Board led to improvements for voters, with all Returning Officers meeting the Commission's standards for well-run polls.”*

### **The EMB's role in other electoral events**

The Act only gives the EMB a role in respect of local government elections. As yet there is no remit for the three Parliamentary elections: European, UK and Scottish, nor for any referendums. The recent Edinburgh Agreement with respect to a referendum on independence for Scotland proposes a major role for the Board.

### **Proposed role in the 2014 Referendum**

This Agreement states

*Both governments agree that the referendum rules should be based on PPERA, with particular Scottish circumstances, such as the establishment of the Electoral Management Board and subsequent role of the Electoral Commission, reflected in the Referendum Bill. (Para 3)*

*The Scottish Government proposes that the conduct of the poll and the announcement of the result should reflect the arrangements for local and parliamentary elections in Scotland and will be consistent with Scotland's electoral management structure, co-ordinated by the **Electoral Management Board**. The poll and count will be managed in the same way as those elections, by local returning officers (designated for the referendum as “counting officers”) and directed by a Chief Counting Officer (CCO). **The Scottish Government proposes that the CCO should be the Convener of the Electoral Management Board.** (Para 15)*

## **QUESTION FROM THE COMMITTEE**

The Committee pose a series of questions. These are answered below.

**Paragraphs 12-15 of the intergovernmental Agreement provide for a division of labour between the Board and the Electoral Commission. Do you anticipate any particular challenges in this regard?**

The division of labour which is provided for in the Agreements is not a concern to the EMB. It reflects the arrangements that operate for local government elections in Scotland as laid down in the Local Electoral Administration (Scotland) Act 2011, which gives the EMB the duty of coordinating elections and the Electoral Commission the responsibility for monitoring them. These split responsibilities were worked successfully in the administration of the Scottish local government election in May 2012. This was noted in the Electoral Commission's report on the elections:

*Although established on an interim basis in November 2008 this was the first occasion that the Electoral Management Board (EMB) had a statutory role for council elections. The EMB's duty to coordinate the administration of council elections in Scotland was an important test for the body's development, and we believe its actions contributed positively to the delivery of these elections.*

The EMB supports and encourages greater co-ordination and a more consistent approach to electoral administration among returning officers and electoral registration officers. The Convener and the Board oversee the delivery of those aspects of the electoral process where central co-ordination would be beneficial, promoting best practice and where necessary giving directions.

The Electoral Commission report on the administration of local government elections, run public awareness and information campaigns on elections and the local government system and provide advice and information to returning officers, candidates and political parties. They apply performance standards to returning officers for local government elections and include local government elections in Scotland within the Commission's Observers Scheme.

This division of labour is appropriate and continues the approach that has been implemented between the Electoral Commission and the EMB over recent elections in Scotland, either informally or formally under the Local Electoral Administration (Scotland) Act 2011. There is therefore a clear expectation that this arrangement will also work successfully for this referendum. Discussions around this relationship are already underway with the Electoral Commission. A partnership exists in which both organisations are aware of their distinct roles but work well together.

***Are you satisfied that the EMB will have adequate resource and expertise to deliver its responsibilities effectively?***

The EMB will need additional resource to run the referendum, but a plan is in place to identify what is needed and how this will be put in place. There is full confidence that the EMB will be able to deliver its responsibilities effectively. The EMB is aware that appropriate expertise will be needed and we are taking steps to obtain it, planning the resource requirements and quantifying what is needed.

The Referendum will see the Convener of the EMB having a substantially enhanced role in an operational sense and the resource requirements will be specified to reflect this.

The EMB currently operates with limited dedicated resource. Board members provide input to specific pieces of work, drafting material and guidance and assisting in the planning and promotion of events. In addition, the DRO in the City of Edinburgh Council provides a secretariat function to Board meetings and supports the Convener in terms of the preparation of policy papers, directions, consultations and training materials.

While the EMB operated with this level of resources in 2011/12, there was clearly a need for additional support and this situation was obviously an interim arrangements while the Board was formally established.

Additional formal and fulltime resourcing is needed for the EMB as it moves forward. This will be especially the case if the Convener takes on a role as Chief Counting Officer responsible for the planning, conduct and administration of a national Referendum in 2014 as anticipated in the Edinburgh Agreement.

Some resources were made available by Government for the operation of the EMB in its first year, but these will need to be augmented if the Board is to build on this and develop as it needs to in the future, in the service of the voter. This has been recognised by the Scottish Government and discussions are underway to ensure that sufficient resources and expertise are available to the Board to support it in its new and enhanced role.

A Project Plan is being drafted to identify the various resource requirements leading up to the Referendum and this will be used to scope the range of skills and expertise that will be needed to support the work of the EMB.

***What assurance can you give the Committee about cooperation between the Board and the Commission?***

The EMB has always worked closely and very successfully with the Electoral Commission since its inception as an interim body.

- The Electoral Commission was instrumental in the creation of the interim Board in 2008 and has supported the Board since then;
- Electoral Commission officers attend every meeting of the Board as advisers;
- Electoral Commission officers participate in the EMB Working Groups, such as the Forms Group which drafts standard forms for use across Scotland;
- The EMB participates in the Political Parties Panel (PPP) facilitated by the Electoral Commission;
- The EMB worked with the Electoral Commission in monitoring the performance of Returning Officers in the May 2012 polls, with the Convener considering regular performance monitoring reports from the Electoral Commission, and taking action on any issues arising for resolution
- The EMB and the Electoral Commission have run joint training and briefing events in preparation for elections and to review the experience of the elections.

There is a good track record of cooperation between the EMB and the Electoral Commission in Scotland. It is expected that this will continue as preparations progress for the 2014 Referendum.

Meetings have been held between the Convener of the EMB and the Chair of the Electoral Commission to discuss the way in which the two bodies can work together in preparation for the Referendum. It is expected that these meetings will continue and that there will also be ongoing discussions with the Electoral Commission in Scotland. Meetings have already been held with the Electoral Commission, including a meeting between the Convener of the EMB and the Head of the Electoral Commission, and these will continue. Actions are already being identified to progress planning with the Electoral Commission sharing their experience and expertise developed as CCO for the UK Referendum in 2012 and the Welsh Referendum earlier that year.

## **SUMMARY**

The EMB has worked with the Electoral Commission in a close and cooperative fashion under the requirements of the Local Electoral Administration (Scotland) Act 2011 and previous to that when it was an interim body.

The two bodies have distinct roles under that Act, but have operated to complement each other to create a robust framework for administering and monitoring electoral events in Scotland. The EMB has already commenced a series of meetings with the Electoral Commission to discuss how the two organisations will work together to support the delivery of a secure, transparent and effective referendum with a result in which the voter can have full confidence.

It is clear that fulfilling the duties of the EMB in relation to the Referendum as proposed in the Edinburgh Agreement will require additional resources and expertise within the Board.

Discussions have been held with the Scottish Government about how these can be identified and a process has been identified for the EMB to claim funds to support its work.

November 2012