

Part E – Improving completeness and accuracy

Contents

- 1 Definition of a complete and accurate register
- 2 Sources of information for electoral registration
 - Inspection of other council records
 - The use of third-party data
 - Electoral Registration Officers' entitlement to request information
 - The property database
- 3 Capturing data about new residents
 - Other methods of reaching electors
- 4 Integrity
 - Suspicious forms
 - Objections and reviews

1 Definition of a complete and accurate register

1.1 Electoral Registration Officers have a duty to take necessary steps to maintain the electoral register.¹ In order to maintain a complete and accurate electoral register, there is a need not only to ensure that every person who is entitled to be registered has an entry but also to remove entries from the register for those electors who are no longer eligible.

1.2 The Commission's interpretation of 'completeness' and 'accuracy' in relation to electoral registration, based on the legislative requirements for electoral registration in Great Britain, is as follows.

1.3 Completeness means:

- Every person who is entitled to have an entry in an electoral register is registered.
- No person who is not entitled to have an entry in an electoral register, including fictitious or dead persons, is registered.
- All relevant fields are completed in relation to every entry.

1.4 Accuracy means:

- None of the required information relating to any person registered is false or incorrect, intentionally or otherwise.

1.5 Essentially, 'completeness' therefore means ensuring that only eligible people are included in the register of electors, while 'accuracy' relates solely to the information that exists on the register without comment as to whether it should be on the register or not.

¹ Section 9A, RPA 1983.

2 Sources of information for electoral registration

Inspection of other council records

2.1 The Electoral Registration Officer is authorised to inspect, for the purposes of their registration duties, records kept in whatever form by:²

- (a) the council which appointed them and any registrar of births and deaths³
- (b) any person, including a company or organisation, providing services to, or authorised to exercise any function of, any such authority as defined in (a) above

2.2 Those persons, companies and organisations in (b) above include those that are providing 'outsourced' services under any finance agreement.



In England, it is important to note that only Electoral Registration Officers appointed by unitary authorities will have access to all of the council records for the area. Education records, for example, are not held by district councils but by county councils; Electoral Registration Officers appointed by a district council will therefore not be able to access those records.

2.3 The Electoral Registration Officer is also entitled to make copies of any information contained within these records.⁴

2.4 The Electoral Registration Officer is required to make such use of these powers as is necessary in order to maintain the register.⁵ This duty applies throughout the year and is not confined to the canvass period.

2.5 In order to provide evidence that the Electoral Registration Officer has fulfilled their duty to carry out the necessary steps under Section 9A of the RPA 1983, they should ensure that a record is kept of all council records inspected.

The Data Protection Act 1998

2.6 The Data Protection Act 1998 does not prevent the Electoral Registration Officer from viewing every record of the authority that appointed them as long as the data is used for electoral registration purposes.

2.7 Based on the Commission's interpretation of Section 9A of the RPA 1983, the Information Commissioner's Office has advised the Commission that, as Electoral Registration Officers have a legal duty to inspect local authority records for the purposes of maintaining the register, local authorities are consequently under a legal duty to disclose the information requested by

² Regulation 35, RPR 2001.

³ In Scotland, it is the registrar of births, deaths and marriages.

⁴ Regulation 35(3), RPR 2001.

⁵ Section 9A(2)(d), RPA 1983.

the Electoral Registration Officer, and the Data Protection Act 1998 'will not act as a barrier' to the disclosure of the required information.



The Information Commissioner's full advice is as follows:

The Electoral Commission has informed us that Electoral Registration Officers have a duty under Section 9A of the RPA 1983 to review as many council-held databases as they feel necessary for the purposes of maintaining the electoral register. Because this legal duty obliges a local authority to disclose the information requested by the Electoral Registration Officer, the Data Protection Act 1998 (DPA) will not act as a barrier preventing local authorities from disclosing this information.

Organisations must have a legitimate condition for processing before they can process any personal data and the disclosure of information to Electoral Registration Officers is a form of processing. The conditions can be found in Schedule 2 and, in the case of sensitive personal data, Schedule 3 of the DPA. The relevant conditions for these circumstances would be "*for the exercise of any functions conferred on any person by or under any enactment*" (Schedule 2(5)(b) and Schedule 3(7)(1)(b)) and it may be helpful for Electoral Registration Officers to refer their local authorities to these conditions.

Local authorities should also refer to Section 35(1) of the DPA, which states: "*Personal data are exempt from the non-disclosure provisions where the disclosure is required by or under any enactment, by any rule of law or by the order of a court*". In general the non-disclosure provisions can be defined as the sections of the DPA which are designed to protect personal data from unlawful disclosure. They are the fair and lawful processing aspects of the first principle; the second, third, fourth and fifth principles, Sections 10, 14(1) and (3).

However, the non-disclosure provisions are not a blanket exemption to all of the above provisions, under all circumstances. We would not consider the fair processing requirement to be a non-disclosure provision in this situation. This is because we do not believe that informing data subjects that local authorities are under a legal obligation to disclose personal data to the Electoral Registration Officer, for the purposes of maintaining the electoral register, is inconsistent with that particular disclosure. Therefore, we think that local authorities should inform data subjects, as soon as it is practicable to do so, that their personal data may be disclosed to Electoral Registration Officers, for the purposes of maintaining the electoral register. We would accept that the most practicable method by which local authorities can inform data subjects is when fair processing notices are routinely updated. However, we still would encourage local authorities to try to make fair processing information available in the meantime, e.g. via their website or by any other convenient method.

2.8 Records held by the local authority and the registrar of births and deaths are likely to contain personal data about individuals and so any inspection should comply with the Data Protection Act 1998. The Commission recommends that Electoral Registration Officers liaise with the Data

Protection Officer within their appointing local authority to ensure that any inspection they carry out is so compliant.

2.9 The Electoral Registration Officer should be aware of the potential risks of storing personal data, whether kept electronically or in hard copy format, and appropriate office procedures should be in place for ensuring the security of this data. It may be advisable to seek advice from the appointing authority's Data Protection Officer and from the IT department as to what appropriate procedures could be adopted in order to mitigate the risks to the security of the data.

2.10 Further information can be obtained from:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: 08456 30 60 60
www.ico.gov.uk

Information Commissioner's Office –
Scotland
93 - 95 Hanover Street
Edinburgh EH2 1DJ
Telephone: 0131 301 5071
Email: scotland@ico.gsi.gov.uk

Information Commissioner's Office –
Wales
Cambrian Buildings
Mount Stuart Square
Cardiff CF10 5FL
Tel: 029 2044 8044
Email: wales@ico.gsi.gov.uk

The use of third-party data

2.11 Although the records that may be inspected were not compiled with electoral registration criteria in mind and may not provide all the information that an Electoral Registration Officer requires, they can nevertheless provide useful partial or additional information to assist the Electoral Registration Officer in their registration duties. It should be noted that while records may assist an Electoral Registration Officer in identifying who does not have an entry in the register, any new entry made under the rolling registration process must always come from an application.

2.12 Information gathered from a third party should be treated with some caution as it may not be as reliable as information gathered directly from the householder or applicant. It is therefore recommended that information obtained from a third party be cross-checked where possible in order to validate it. If this is not possible, a record should be kept of the source of the information and the steps that were taken to obtain it.

Electoral Registration Officers' entitlement to request information

2.13 If the Electoral Registration Officer has any doubts about the eligibility of any applicant, they have the power to require any person to provide **information** relating to the eligibility of that applicant, namely regarding their age, nationality, residence and whether or not they are disqualified.⁶ Additionally, if the Electoral Registration Officer has doubts about the age or nationality of any applicant, they may also require that person to provide **evidence** demonstrating that they meet either or both of these requirements.⁷

2.14 The items which should be accepted by the Electoral Registration Officer as **evidence** of a person's age or nationality include:⁸

- a birth certificate or a statutory declaration stating the applicant's date of birth
- a certificate of naturalisation
- a document showing they have become a Commonwealth citizen
- a statutory declaration that they are a qualifying Commonwealth citizen, a citizen of the Republic of Ireland or a European Union citizen.

2.15 The cost of producing or copying documents should be reimbursed to the applicant by the Electoral Registration Officer and such fees are a registration expense to be met by the local authority.⁹

2.16 Electoral Registration Officers can require **any person** to give **information** required for the purposes of their duty to maintain the registers of Parliamentary and local government electors.¹⁰ This power enables Electoral Registration Officers to obtain information and it means that, for example, housing associations or private landlords can be required to give information. In all cases, Electoral Registration Officers are advised to seek cooperation in the first instance, rather than using the threat of legal action; explaining the law may be sufficient to achieve the desired effect.

2.17 There may, however, be occasions when the Electoral Registration Officer may wish to initiate legal action against someone who has been persistently uncooperative or obstructive. Any person who refuses to provide the information that is required to prepare the register is liable on summary conviction to a fine not exceeding level 3 on the standard scale, currently set at £1,000.¹¹ Any person who knowingly provides false information in connection with registration is liable on summary conviction to a fine of up to £5,000, imprisonment of up to six months, or both.¹² It is important to

⁶ Regulation 23, RPR 2001.

⁷ Regulation 24, RPR 2001.

⁸ Regulation 24(2), RPR 2001.

⁹ Regulation 24(3), RPR 2001.

¹⁰ Regulation 23, RPR 2001.

¹¹ Regulation 23(3), RPR 2001; Regulation 23(2), RPR (Scotland) 2001.

¹² Section 13D, RPA 1983.

remember that a person is not guilty of providing false information if they did not know, or had no reason to suspect, that the information was false.

The property database

2.18 To maintain the register, the Electoral Registration Officer will require a comprehensive property database in order to be able to canvass potential electors within their registration area. Steps to establish or maintain an accurate property database can be taken throughout the year, and while canvassers employed to prepare the register are extremely valuable in seeking out properties not on the current database, there are other methods of obtaining this information. The inspection of other local authority records can assist the Electoral Registration Officer with identifying new residential properties and those that have undergone a change of use, as well as those that are empty, non-existent or are yet to be built.

2.19 It is essential that all properties are placed in the correct polling district in order to avoid electors being included in the wrong electoral area. Particular care will need to be taken in this regard in respect of new properties. Inspection of other local authority records such as mapping systems can be used to help to ensure the correct placement of all properties within the property database.

2.20 Liaison with the following departments will also assist in the provision of accurate property data.

2.21 **Council tax:** The Valuation Office will supply the council tax office with details of changes to rateable values for properties, for example when properties are newly converted, built or demolished. A copy of this information could be requested by the Electoral Registration Officer.



In Scotland, the process of checking council tax records is facilitated by the fact that most Electoral Registration Officers are also Assessors with responsibility for making up for their area both the valuation roll for the purpose of non-domestic rates and the valuation list for council tax.

2.22 **Register of households in multiple occupation (HMOs):** HMOs may cause Electoral Registration Officers some difficulties when attempting to canvass them. Electoral registration forms addressed to 'The Occupier' may not be completed by any of the residents simply because the form is addressed to 'The Occupier' of the building and not to any room or flat in particular.

2.23 The Housing Act 2004 introduced compulsory licensing of HMOs in England and Wales on 6 April 2006. The Housing (Scotland) Act 2006 makes similar provisions regarding HMOs in Scotland.

2.24 In England and Wales, as part of the licensing scheme, landlords of HMOs are required to provide the licensing council with the following information:

- the name and address of the landlord and the managing agent (if there is one)
- the number of separate letting units
- the number of households in the HMO
- the number of people occupying the HMO

2.25 In addition, a local authority will maintain a public register of the licences it has granted, which must contain the number of rooms in the HMO providing:

- sleeping, and
- living accommodation (or, in the case of an HMO comprising flats, the number of flats)

2.26 Similarly, in Scotland, landlords must supply the local authority with specific information regarding HMOs, and in turn local authorities are required to maintain public registers containing information regarding HMO licences for living accommodation in their area.

2.27 Electoral Registration Officers should arrange to inspect these records when reviewing their property database in order to ensure that all households within HMOs receive separate electoral registration forms.

2.28 Planning and building control: Planning consent and building control information may be of value to Electoral Registration Officers in maintaining their property database. The development control section should be able to supply regular lists of consents. Some of the information on the full list of consents, such as non-residential or listed building consents, may be irrelevant to the Electoral Registration Officer, and so care should be taken not to add any information that is irrelevant to the property database.

2.29 Outline planning consents should be held on record for information purposes by the Electoral Registration Officer until such time as full consent is granted. It is possible that a developer might not start a development for up to five years and details of a consent may be changed prior to the development taking place. It is recommended that planning consents are monitored for five years but that the property database is not amended until the development actually takes place.

2.30 Inspection of building control records can also give an indication of the state of progress of new developments and whether they are ready for residential occupation.

2.31 Local land and property gazetteers (LLPGs) and corporate address gazetteers (CAGs): LLPGs in England and Wales and CAGs in Scotland are becoming increasingly common in local authorities, and indeed many authorities are moving towards a single corporate property database maintained by a gazetteer custodian. In such cases, it may not be possible for the Electoral Registration Officer to have complete control over a dedicated property database and so it is imperative that they work closely with the gazetteer custodian to ensure quick and accurate updates to the electoral registration property database. Where possible, Electoral Registration Officers

should consider holding the unique property reference number information taken from these sources on their own databases, which could then be used along with geographical information systems, as set out below. While a comprehensive and up-to-date gazetteer should be able to provide information on all units of accommodation, including rooms and flats within buildings, the Electoral Registration Officer may still discover changes to properties, which will need to be fed back to the LLPG or CAG as appropriate.

2.32 Geographical information systems (GIS): GIS can be a useful tool in locating properties and in maintaining boundaries of canvass areas and polling districts, in addition to other electoral boundaries. Maps could be provided to canvassers to help locate properties and to track progress of any new developments. Additionally, GIS used alongside properly referenced property data can be particularly useful in analysing variations in returns of information, and so can inform the planning of how Electoral Registration Officers can fulfil their Section 9A duties.

2.33 Street naming: Street naming and numbering orders will give information about properties, new developments and any changes to road names and numbering schemes within a street. If such information is not already supplied by the department responsible for street naming and numbering, Electoral Registration Officers should ask for it as it will be of assistance in planning the canvass.

2.34 Social services: Social services will be able to provide current lists of residential and care homes. Additionally, social services may be able to provide details of certain disabled people living at home, such as those who are blind, deaf, etc, which can enable the Electoral Registration Officer to tailor the service they provide to such individuals.

2.35 Canvassers: Electoral Registration Officers should ensure that canvassers receive clear instructions about recording and reporting property-related issues that they identify, for example if a building has been demolished, flats reverted back to a house or a new property built.

2.36 Many commercial and industrial premises have residential dwellings attached to them that might not be obvious, and care should be taken to ensure that such premises are canvassed. Shops are one such example where flats might be situated above the retail premises, and their use as residential units may vary from year to year; making contact with shop owners and employees may help to identify residential dwellings.

2.37 External sources of information may also prove valuable. **Royal Mail**, for example, can provide information on postcodes. Postcode updates are published on an annual basis and can be downloaded free of charge from www.royalmail.com/postcodeupdates. Electoral Registration Officers may also obtain postcodes for particular addresses, or addresses for postcodes, at www.royalmail.com.

2.38 Returned letters can be an indication that the addressee has moved or, in some instances, may alert the Electoral Registration Officer to a fraudulent

registration. The Electoral Registration Officer should therefore monitor any mail that is returned to the office as undelivered on an ongoing basis. If, as a result of those checks, the Electoral Registration Officer has any concerns as to the accuracy of a particular register entry, they should cross-check the information they hold with that on other council records. If they have the resources, they may also wish to make a personal visit. If, following the data-matching exercise and/or the personal visit, the Electoral Registration Officer continues to have doubts over an existing entry, they should conduct a review of registration, the process for which is set out in Part D, 'Monthly alterations to the register'.

2.39 Where poll cards are hand-delivered by electoral staff, this exercise can also be used to conduct a 'mid-year' check of the database.

2.40 **Land Registry/Registers of Scotland:** These sources can be used to find information on property ownership and sales of property, which can provide a useful source of information on changes, particularly as the name of the buyer is given which allows the Electoral Registration Officer to send personalised correspondence.

3 Capturing data about new residents

3.1 The inspection of other council records and the entitlement to request information should support or prompt registration activity particularly where direct approaches to the household, such as the sending of annual canvass forms and personal canvassing, have not confirmed whether the people resident are eligible to be included on the register.

3.2 **Council tax records:** Inspection of council tax records may enable a personalised canvass or rolling registration form to be sent to a person named in the record rather than being sent to 'The Occupier'. It may be the case, however, that the person named in the council tax record is not eligible to register to vote, for example if they own the property but do not reside there. Council tax records can also be used to provide evidence that a property is empty. Access to the records should include any screens that contain any supplementary notes, as this detail may assist in clarifying who is resident at a property.

3.3 **Housing:** The records of arm's-length management organisations and housing records where the council maintains the housing stock directly can all be inspected for details of tenants.

3.4 **Register of households in multiple occupation (HMOs):** As explained in more detail in Section 2, 'Sources of information for electoral registration', above, the local authority-maintained registers of HMOs contain information regarding HMO licences for living accommodation in the area.

3.5 Electoral Registration Officers should consider inspecting these records and consequently making contact with landlords or managing agents for information about their tenants; although it may be difficult for them to provide all the necessary information to facilitate registration, they are likely to be in a position to provide names and thus enable the Electoral Registration Officer to send personalised correspondence to the resident requesting the necessary information.

3.6 **Registrar of births and deaths:** Electoral Registration Officers can use information from the registrar to update the register of electors. There are, however, limitations to the effectiveness of this exercise: for example, registrars only record deaths within their registration area and this may not coincide with the boundaries of the Electoral Registration Officer. It may therefore be necessary to contact more than one registrar to get information covering the whole of the registration area.

3.7 Recording deaths and altering the register accordingly reduces the likelihood of sending a poll card or canvass form showing the name of a deceased person, which will avoid causing distress to relatives of the deceased. The names of deceased electors can be deleted from the register as part of the monthly notice of alterations procedure.



Further information on the monthly notice of alterations procedure can be found in Part D, 'Monthly alterations to the register'.

3.8 Information received from the registrar about marriages could also be a useful trigger for a notice of alteration form to be sent out in respect of a surname change and may also indicate that there is an additional resident in the property. Where an elector has an absent vote, a new absent vote application form should also be mailed in order to enable the collection of the new signature.

3.9 **Universities/further education establishments:** It may be appropriate for officers to attend university 'freshers' weeks' to encourage attendees to complete an electoral registration form. Equally, it may be useful to establish relationships with organisations or college staff responsible for assisting with accommodation in order to obtain student details.

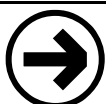
3.10 In universities or other educational establishments which cover more than one registration area, Electoral Registration Officers may wish to consider working with other, neighbouring Electoral Registration Officers.

3.11 **Residential homes:** The wardens of accommodation for the elderly may be helpful in providing information on changes of residents. Electoral Registration Officers should consider keeping records of such establishments, and indeed of other establishments such as hostels catering for those with mental health conditions, in order to obtain information and to give residents and wardens additional advice on the registration process.

3.12 The warden's or owner's help might also be enlisted to provide information on any staff accommodation, such as flats or annexes, which will also need to be canvassed.

3.13 **Caravan parks:** Some people may consider their caravan their second home or indeed may live there on a permanent basis. Members of the travelling community may also settle for a period of time at a caravan site. Site managers of these parks should be contacted as they may be able to provide Electoral Registration Officers with information on changes of residents.

3.14 Travellers may also settle at other locations designated by the local authority. Officers at unitary and county councils will have responsibility for maintaining these designated sites and may be able to assist Electoral Registration Officers in identifying those who would be eligible to register.

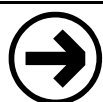


For further details on the entitlement of travellers and second home owners to be registered, see Part B, 'Entitlement to register'.

3.15 **Shelters, hostels and the homeless:** The council department with responsibility for the homeless should be able to provide details of shelters and hostels. Shelter and other voluntary organisations operating in this area

may also have information that Electoral Registration Officers would find useful.

3.16 Citizenship ceremonies: Electoral Registration Officers may wish to liaise with those with responsibility for citizenship ceremonies in order to get rolling registration forms included in the welcome pack produced for the new citizens, and may also seek to find out the addresses of the new British citizens in order to ensure that these registration forms are completed and returned.



For further consideration of citizenship and eligibility to register, see Part B, 'Entitlement to register'.

Other methods of reaching electors

3.17 Electoral Registration Officers must, by such other means as they think appropriate, contact persons who do not have an entry in the register, as this is one of the steps listed as part of the duty to take necessary steps to maintain the register.¹³ This wide-ranging duty applies **at any time of the year** and is not confined to the canvass period.

3.18 During the canvass period, Electoral Registration Officers should consider making contact with secondary schools and sixth-form colleges to ensure that 16- and 17-year-olds are identified and made aware of the electoral process, including how to register to vote. It may be appropriate for Electoral Registration Officers or their staff to attend Local Democracy Week or other school/college-based events and encourage attendees to complete an electoral registration form. If possible, the Electoral Registration Officer could consider taking an electronic copy of the register to any such events in order to avoid duplicate registrations.

3.19 Outside the canvass period, rolling registration forms could be sent to addresses where the Electoral Registration Officer becomes aware that there may be new residents, for example through information obtained from land charges or council tax records. Electoral Registration Officers may also consider making registration forms available through estate agents or letting agencies. Additionally, Electoral Registration Officers may consider it appropriate to carry out personal canvassing of properties where it has been identified that there may be new residents.

3.20 There are also informal methods of obtaining information, such as telephoning the householder or seeking information from a neighbour, which may be appropriate in some circumstances. Sometimes personal canvassers may speak to a person on the doorstep of a property who alleges that they do not live at the property but who still provides them with verbal information. By making and keeping detailed file notes, the accuracy of the information obtained in this way can be verified. If possible, a cross-check should also be

¹³ Section 9A(2)(c), RPA 1983.

made using another source. Alternatively, a letter confirming the information received could be sent to the occupier of the property, stating who will be registered in respect of that address.

4 Integrity

4.1 The consideration of integrity issues is critical to the Electoral Registration Officer's ability to produce a complete and accurate register, and also to the maintenance of absent voting records.

Suspicious forms

What to look for?

4.2 Electoral staff are uniquely placed to identify fraud or attempted fraud. They should be alert to:

- a number of forms completed in the same hand
- a large number of forms from the same property or an instance of unlikely living arrangements (e.g. 10 people to a bed-sit property)
- suspiciously high or low rates of return during the canvass period which may imply that the canvasser is 'armchair canvassing' or that the canvasser or postman is not delivering the forms

4.3 It is important to consider the procedure for handling an absent vote signature waiver. The Electoral Registration Officer has the power to waive the signature requirement if they are satisfied that 'the applicant is unable to provide a signature or consistent signature due to any disability or inability to read or write'.¹⁴ The Electoral Registration Officer should consider taking steps to ensure that a waiver request is genuine and not an attempt to bypass the security procedures.



For further consideration of waivers, see Part G, 'Absent voting'.

Action to take

4.4 Should an Electoral Registration Officer receive an application for registration which gives rise to suspicion, they have the power to ask for further information to enable a decision on the application to be taken.¹⁵

4.5 The following are some suggested approaches that the Electoral Registration Officer should consider adopting in order to ensure that matters of integrity are well-addressed:

- Forms should be carefully checked and registration staff fully briefed on the need to be alert to any irregularities in registration or suspicious forms.

¹⁴ Paragraphs 3(8), 4(5) and 7(11), Schedule 4, RPA 2000; Articles 9(7), 10(7) and 12(11), Scottish Parliament Order; Articles 8(8), 9(5) and 12(12), NAW (RoP) Order 2007.

¹⁵ Regulation 29(3), RPR 2001.

- Canvassers should also be trained to spot any matters of irregularity, e.g. if they collect a form from a property which contains many more names than they would expect from a property of that size.
- Steps can be taken to prevent fraud by canvassers themselves (e.g. so-called 'armchair canvassing') through close monitoring of their work. Canvassers should be required to maintain records, including the date and time of all visits that they make. Furthermore, staff should be made aware that checks of their work will be undertaken, whether spot checks and/or a check of a percentage of their total returns.
- Applications for registration should be acknowledged on receipt. This gives the person living at the address on the form a chance to object to an application should someone have used their address for fraudulent purposes.
- An acknowledgement must be posted to the elector once a change to the register has taken effect.
- Electoral Registration Officers should consider telephoning or emailing an applicant, where these contact details have been provided, if clarification is needed on any details on an application for registration.
- Nursing homes and rest homes merit special attention in respect of advice to staff about the level of assistance they can give to residents. Similar advice could also be given to home helps and other social services staff.
- Electors who are no longer resident should be removed from the register, using the power to conduct a review where appropriate.
- There is no legislation on the retention of registration forms, but good practice advice would be to hold them for the life of the register. This would enable checks to be carried out in the event of the identification of clerical errors or a malpractice investigation.

4.6 In the event that an application for registration is deemed suspicious, there are a number of courses of action that could be taken to verify the application. The applicant may be contacted and asked to supply additional information, or other records may be checked. Alternatively, the Electoral Registration Officer may think it is appropriate to hold a hearing in order to determine the entitlement of the applicant to be registered.



For further consideration of hearings, see Part D, 'Monthly alterations to the register'.

Further action

4.7 The Electoral Registration Officer has no power to carry out further investigations on applications still deemed to be suspicious following the checking procedures described above. Any such applications should then be referred to the police. The Commission can provide Electoral Registration Officers with advice on when suspicions should be referred to the police and with contact details of their local police Single Point of Contact (SPOC).

Liaison with the SPOC is advisable in any event, and should cover what actions should be taken where any suspicions arise.

4.8 Documentation that the Electoral Registration Officer would need to provide to the police if requested would include:

- All papers received (including envelopes), sealed in a packet or envelope. Handling of the documentation by staff should be kept to a minimum.
- Copies of the internal documents used to conduct internal checks (e.g. council tax records).

4.9 Additionally, Electoral Registration Officers should alert the Commission to any suspicious applications, as it holds records and considers patterns of such occurrences.

Objections and reviews

4.10 The powers which allow objections to be made to a person's registration before or after the entry is made,¹⁶ as well as the powers allowing the Electoral Registration Officer to conduct a review of entitlement to registration,¹⁷ are important tools in maintaining the integrity of the register.



For further details on objections and reviews, see Part D, 'Monthly alterations to the register'.

¹⁶ Section 10A(3) and (3A), RPA 1983.

¹⁷ Regulations 31B and 31D, RPR 2001.