



# Electoral registration in Great Britain

Report on performance of Electoral Registration  
Officers in 2012

May 2013

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# Summary

In order to take part in an election in Great Britain, individuals need to be included in an electoral register. We want people who are entitled to vote to be confident that registering to vote is as straightforward, accessible and secure as possible. We also want them to receive a consistently high-quality service wherever they live. It is the responsibility of the 380 Electoral Registration Officers (EROs) across Great Britain to deliver this.

On 31 January 2013 the Electoral Registration and Administration Act (ERA Act) received Royal Assent, paving the way for the introduction of individual electoral registration (IER) in Great Britain from summer 2014. The introduction of IER in Great Britain will be the biggest change to the voter registration process since the universal franchise was introduced. It requires careful planning and implementation and needs to be done in a way that puts the voter first, which makes it even more important than ever that registration services are delivered well.

The Electoral Commission sets standards and monitors the performance of EROs through our performance standards framework. We also provide guidance and resources for EROs to support improvements in electoral registration practice. We highlight where electoral registration is well-run and challenge EROs where the service provided is below standard. However, while we can intervene to recommend improvements, we do not have the powers to direct EROs to take steps to improve their performance. The Secretary of State does, however, have a power of direction over EROs which is exercisable on a recommendation from the Commission. This power was used in England (excluding London) and Wales in 2012 to change the timing of the canvass, but it has not been used to require action of individual EROs to date.

This report is our assessment of ERO performance in 2012, and looks at how this compares to performance in 2011. It also addresses what EROs should be doing between now and June 2014 in preparation for the transition to IER.

Since 2008 there has been continuing improvement in performance against the standards, with a significant increase in the number of EROs meeting the standards over the past five years.

However, in 2012 we found that 33 EROs did not meet one of the performance standards.

In 2012 the Commission required EROs to report on their performance against the standards earlier than in previous years, with reports submitted prior to start of the annual canvass rather than following publication of the revised register. This enabled us to monitor performance throughout the process of planning for and delivering the annual canvass, and to intervene where any issues were identified in order to recommend improvements prior to publication of the revised register.

In our analysis of activities at the 2011 annual canvass, we identified 58 EROs who did not meet performance standard 3: house-to-house enquiries. In 2012, we found there had been an increase in the number of EROs meeting or exceeding this standard; but there are still 30 EROs (8%) who do not meet the standard.

It is particularly important that in preparation for the transition to IER, EROs do all they can now to ensure that their registers are as accurate and complete as possible by taking all available steps – including carrying out house-to-house enquiries and using available local data to identify and target potential electors and to verify and validate data held on the electoral register – before the transition to IER begins.

A comprehensive canvass in 2013/14, coupled with ongoing registration activity throughout the year, will help to maximise the number of electors who can be ‘confirmed’ in the initial stages of the transition, which will in turn help to reduce the number of electors that EROs will need to follow up with and invite to register individually.

The majority of EROs (99%) are now able to demonstrate that they have in place a strategy for carrying out effective public awareness, which provides a good basis from which to prepare for the transition to IER. Maximising the number of voters registered under IER will require a robust local public engagement strategy which is implemented effectively. EROs will need to ensure that they effectively map out who will need to be targeted and how they will do this, including how they are going to work with internal and external partners to support this. The confirmation dry-run in summer 2013 will give EROs a good indication of what they might expect in the live exercise and the results should be used by EROs to inform the development of their public engagement strategy.

Given the significant change to existing processes that the transition to IER will involve, we are developing a new performance standards framework to support EROs in meeting the challenges inherent in delivering the transition. We are committed to ensuring that EROs and their staff have the opportunity to input into the development of the new performance standards framework, and will be seeking views from the electoral community to inform this work.

In the meantime, we intend to use the current standards to monitor performance in advance of the 2013/14 household canvass, which EROs will want to ensure is as comprehensive as possible in order to make the transition to IER as effective as possible, benefitting them and their staff as well as electors. The Commission will again require all EROs to report on their performance prior to the start of the canvass, and we will focus on working with those EROs who are not meeting the standards, to provide support and recommend improvements before and throughout the annual canvass.

We will also carry out our annual data collection exercise following the conclusion of the canvass.<sup>1</sup> We will continue to work with EROs to ensure that the data collected is as robust as possible. It is important that EROs are making full use of the information available to them and understand what it tells them about their own performance. **During the transition to IER this will be particularly important, supporting an assessment of how effective the processes employed by the ERO are being, with the available data being used to keep their arrangements under review throughout the transition.**

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<sup>1</sup> The data collected from EROs following the 2012 annual canvass can be found at: [www.electoralcommission.org.uk/performance-standards/electoral-registration](http://www.electoralcommission.org.uk/performance-standards/electoral-registration).

# 1 Background

1.1 The Electoral Commission has the power to set performance standards for Electoral Registration Officers (EROs), Returning Officers and Counting Officers in relation to specified elections and referendums, and a duty to publish assessments of the level of performance by these officers against the standards.<sup>2</sup> The Commission also has the power to collect information relating to expenditure in connection with the specified elections and referendums.<sup>3</sup>

1.2 We first published performance standards for EROs in July 2008<sup>4</sup> and since then we have reported annually on the performance of EROs against these standards.

1.3 The following table sets out the 10 performance standards for EROs in Great Britain:

**Table 1: Performance standards for EROs in Great Britain**

<b>Subject area</b>	<b>Performance standards</b>
Completeness and accuracy of electoral registration records	PS1. Using information sources to verify entries on the register of electors and identify potential new electors (referred to in following charts and text as <i>Information sources</i> ) PS2. Maintaining the property database ( <i>Property database</i> ) PS3. House-to-house enquiries ( <i>House-to-house</i> )
Integrity of the registration process	PS4. Maintaining the integrity of registration and absent vote applications ( <i>Integrity</i> ) PS5. Supply and security of the register and absent voter lists ( <i>Supply and security</i> )
Encouraging participation in the registration process	PS6. Public awareness strategy ( <i>Public awareness</i> ) PS7. Working with partners PS8. Accessibility and communication of information ( <i>Accessibility</i> )
Planning and organisation	PS9. Planning for rolling registration and the annual canvass ( <i>Planning</i> ) PS10. Training

1.4 In 2012, EROs reported on their performance earlier than in previous years, with reports submitted prior to start of the annual canvass rather than following publication of the revised register. This enabled us to work with

<sup>2</sup> Sections 9A and 9B of the Political Parties, Elections and Referendums Act 2000 (PPERA), as inserted by Section 67 of the Electoral Administration Act 2006.

<sup>3</sup> Section 9C of PERA.

<sup>4</sup> *Performance standards for Electoral Registration Officers in Great Britain*, July 2008.

EROs to recommend and support improvements during the annual canvass period rather than receiving and considering assessments after publication of the revised register.

1.5 All EROs were required to report to the Commission by completing a return setting out their performance against the requirements of each standard.

1.6 In 2012, we focussed in particular on performance against standard 3: house-to-house enquiries; and standard 9: planning for rolling registration and the annual canvass. Because of this, in addition to the assessment form, all EROs were required to submit a copy of their project plan and risk register before the start of the annual canvass to support their assessment of performance against performance standards 3 and 9.

1.7 We subjected that evidence to detailed scrutiny, and provided improvement advice both in respect of the quality of the evidence received and on the implementation of the processes set out within the documentation, including visiting EROs and their teams where appropriate.

1.8 We then confirmed or revised the initial assessments of performance against the standards based on our conclusions of the analysis of the evidence.

1.9 We also asked all EROs to provide additional contextual data (the 'annual data collection return'), which included:

- overall registration rates
- the annual canvass response rate
- levels of carry forward of electors
- numbers of changes to the electoral register
- numbers of households which had not had entries confirmed by taking steps under Section 9A of the Representation of the People Act 1983 (RPA 1983), including through making house-to-house enquiries (to support our focus on performance standard 3)

1.10 We used this data to help inform our assessment of each ERO's performance against the standards.

## Canvass timing in England and Wales

1.11 EROs typically carry out the annual canvass in the autumn of each year and must publish a revised register by 1 December. The decision to hold the Police and Crime Commissioner (PCC) elections in England (excluding London) and Wales on 15 November 2012 meant that the polls were scheduled during the normal annual canvass period. To ensure that the registers to be used for the elections were as accurate and complete as possible, in the interests of voters and of political parties and candidates, the Commission recommended that the Secretary of State give a direction to EROs in areas with PCC elections to begin the canvass as soon as

practicable after 2 July (if not before) and to publish their revised register on 16 October. Subsequently, the Secretary of State issued a direction to this effect on 29 February 2012.

1.12 The majority of EROs broadly maintained their annual canvass return rates at a similar level to the rates achieved in 2011. There were some areas where the return rates increased or decreased compared with 2011, but this is not uncommon – in addition to changes in the population, these variations tend to be partly the result of EROs keeping their registration practices under review and making amendments to their processes each year. There were anecdotal reports of EROs facing some challenges arising from the change to the timing of the canvass, particularly given the proximity to the May and November polls; but there is no evidence that the change to the timing had an effect on overall response rates.

1.13 The following chapters provide an analysis of the levels of ERO performance against each of the standards in 2012 and address what EROs should be doing between now and June 2014 in preparation for the transition to IER.

## Transition to individual electoral registration

1.14 On 31 January 2013 the ERA Act received Royal Assent, paving the way for the introduction of IER in Great Britain from summer 2014. While some of the key activities to be undertaken in delivering IER will be similar to or largely based on processes which EROs currently follow, there will be several significant aspects of the process which will be different for EROs.

1.15 In order to deliver the transition to IER effectively it will be critical that EROs:

- **Understand the particular challenges in their registration area and develop a plan for engaging with residents which responds to these challenges.**

As part of the transition to IER, EROs will need to compare existing electors' names and addresses on the electoral registers with records held by the Department for Work and Pensions (DWP) in order to 'confirm' the identity of people currently on the registers. The levels of confirmation will vary within an ERO's area and across different local authority areas, and so the nature and scale of the challenges facing different EROs may vary considerably. Analysis of the results of the confirmation dry-run which is taking place in summer 2013 will help EROs to understand the challenges relevant to them and will inform the development of a local public engagement strategy. Once this strategy is in place, details of how it will be implemented should be embedded within the ERO's overall implementation plan covering everything that needs to be done to deliver the transition effectively. The Commission

will provide a template public engagement strategy, implementation plan and risk register to support EROs in preparing for the transition.

- **Deliver their local implementation plan, monitoring progress and making amendments where necessary**

EROs will need to implement their plans to most effectively target electors. EROs will need to ensure that they have in place systems to track progress against their plans, allowing them to monitor and evaluate their progress and amend their plans as required, and helping them to be able to target their resources appropriately and reflect this back in their plans.

1.16 Any elector on the pre-confirmation registers who cannot be confirmed will not be removed immediately. They will be asked to provide personal identifiers before December 2015,<sup>5</sup> or they will be deleted from the registers.

1.17 However, anyone with an absent vote will need to be confirmed or provide their personal identifiers before the revised electoral registers are published by 1 December 2014 in order to retain their absent vote entitlement. Any new absent vote applications after the transition starts in the summer of 2014 will need to be made by someone who either:

- has been confirmed
- has been, or is at the same time applying to be, registered individually

1.18 From the start of the transition, any new elector will need to make an individual registration application and provide their personal identifiers. If an existing elector changes address, even if they have been confirmed at their previous address, they will need to register individually and provide their personal identifiers in order to be registered at their new address. EROs will need to verify the personal identifiers that applicants provide, against the information held on the DWP database.

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<sup>5</sup> While the legislation says that transition will be complete in 2016, Ministers can lay an Order before the UK Parliament to provide for the transition to be completed by the end of 2015. The UK Government has made it clear that its intention is to complete the transition in 2015. Therefore, while the legislation provides for the removal of electors that have not provided personal identifiers in 2016, it is our view that EROs should plan on the basis that they will have to be ready for the point of removal to be 2015.

## 2 Completeness and accuracy of electoral registration records

2.1 EROs have a duty to conduct an annual canvass of all properties in their area and to publish a revised register on the conclusion of the canvass. In 2012 following the Secretary of State's direction to move the timing of the annual canvass, the publication of the revised register was brought forward to 16 October 2012 for EROs in England (excluding London) and Wales. In preparation for the transition to IER, the 2013 canvass has been postponed, and EROs will be required to publish the revised register by 17 February 2014 in England and by 10 March 2014 in Scotland and Wales.

2.2 In addition to the annual canvass, a proactive approach is also required throughout the year in order to maintain complete and accurate registers, ensuring that as far as possible all eligible persons are on the register and that all non-eligible persons are removed.

2.3 The three performance standards within this subject area aim to ensure that EROs identify and use available records and make the necessary house-to-house enquiries in order to ensure that registers are as complete and accurate as possible.

2.4 It is important that a comprehensive canvass is conducted in 2013/14 in order to achieve as complete and accurate registers as possible ahead of the transition to IER. In addition to the canvass, year-round activity will also be critical. EROs will need to take a proactive approach throughout the year and in particular should be thinking about the activities they will need to carry out after the publication of the revised register in early 2014 to ensure that the registers remain as complete and accurate as possible both for the 2014 polls and for the transition to IER. A proactive approach will help to maximise the number of electors who can be 'confirmed' during the transition, which will in turn help to reduce the number of electors that EROs will need to follow up with and invite to register individually.

2.5 EROs should ensure that they are making full use of all the records available to them to verify entries on the register, taking steps to remove those electors who are no longer entitled to remain registered, in addition to identifying and contacting potential new electors.

# Performance standard 1: Information sources

2.6 This standard aims to ensure that EROs use appropriate sources of information to verify records on the register of electors and to identify and contact potential new electors throughout the year.

2.7 As in 2011, no EROs reported performing below the standard: 24% (91 EROs) are meeting the standard and the remaining 76% (288 EROs) are above the standard.

2.8 While EROs are using records available to them during the course of the year to identify potential electors to be **added** to the register, there is less evidence to demonstrate how other information sources are being used to identify and initiate the **removal** of individuals who are no longer entitled to remain registered.

2.9 As part of our data collection and analysis work following the 2012 annual canvass we focussed on the levels of reviews of registration that were carried out. Whilst the data shows that a number of EROs undertake reviews of registration over the course of the year, the majority of returns submitted to us stated that no reviews had been carried out.

2.10 In each of these instances we followed-up with the ERO to check the position, and the explanations given included:

- administrative difficulties (i.e. software systems not being able to collect and store this data, or difficulties with retrieving the data)
- lack of resources (to undertake the review process and/or to keep robust records of the action taken)

2.11 In total, 57% of EROs were unable to provide us with data to evidence that reviews were carried out in their area.

2.12 The level of reviews EROs should be undertaking will inevitably vary across areas depending on local circumstances, which means the data needs to be reviewed on a case-by-case basis to understand whether all available data is being used to the fullest extent to initiate reviews of registration. Registration reviews form a vital part of the year-round activity to ensure accurate and complete registers, which will in turn impact on the confirmation process at the start of the transition to IER.

In 2013/14 we will seek to understand in more detail when and how EROs carry out registration reviews, building on the work we started this year with analysing the electoral registration data, to enable us to make a better-informed assessment of each ERO's performance against this standard.

## Performance standard 2: Property database

2.13 In maintaining a complete and accurate electoral register EROs need a comprehensive property database in order to be able to canvass potential electors within their registration area. Canvassers carrying out the annual canvass can help to identify properties not on the current database, but steps to maintain an accurate property database should be taken throughout the year. The inspection of other local authority records can assist EROs with identifying new residential properties and those that have undergone a change of use, as well as those that are empty or no longer exist.

2.14 This standard aims to ensure that EROs use all appropriate sources of information available to them to keep their property database up to date.

2.15 As with performance standard 1, no EROs in 2012 reported performance below the standard: 45% (169 EROs) are meeting the standard and the remaining 55% (209 EROs) are above the standard.

The confirmation dry-run exercise to be carried out in summer 2013 in preparation for the transition to IER will provide EROs with information on where it was not possible to match an address on the register to an address on the DWP database.

In preparation for the start of the transition in summer 2014, EROs should take steps to check that a Unique Property Reference Number (UPRN) is attached to each property and should check their property database against the Local Land and Property Gazetteer in England and Wales or Corporate Address Gazetteer in Scotland.

In the confirmation process, a positive address match is a prerequisite for an overall 'green' match, which allows the ERO to confirm the elector and add them to the IER register without any further action; taking steps to improve the address database should help to increase the overall 'green' match rate.

## Performance standard 3: House-to-house

2.16 EROs are required by law to take all steps that are necessary for the purposes of maintaining the electoral register.<sup>6</sup> Section 9A of the RPA 1983 sets out the following steps:

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<sup>6</sup> Section 9A of the RPA 1983.

- sending more than once to any address the form to be used for the canvass
- making on one or more occasions house-to-house enquiries
- making contact by such other means as the Electoral Registration Officer thinks appropriate with persons who do not have an entry in the register
- inspecting any records held by any person which the Electoral Registration Officer is permitted to inspect
- providing training to persons under their direction or control in connection with the carrying out of the duty

2.17 This standard aims to ensure that EROs have a comprehensive written plan in place to ensure that house-to-house enquiries are carried out where necessary.

2.18 There has been an improvement in performance against this standard since 2011: 30 EROs<sup>7</sup> (8%) did not meet the standard in 2012 compared to 58 EROs (15%) in 2011.

2.19 Of the 30 EROs that we found were not meeting the standard, nine reported that they did not meet the standard in their initial returns; the other 21 initially reported meeting the standard but we revised their assessments following our analysis of the supporting data and evidence we had asked all EROs to submit.

2.20 Even in the case of the 30 EROs not meeting the standard, there have been some improvements in performance, with increases in the level of house-to-house enquiries carried out in some areas. Also, we saw evidence which demonstrated that while the full range of steps were not undertaken with all non-responding households, these EROs did generally undertake supplementary follow up activities (such as sending additional reminder letters) with those households that did not receive house-to-house enquiries.

2.21 As part of our assessment of each individual ERO's performance we took into account:

- the extent of house-to-house enquiries that were carried out
- what, if any, other methods were used in addition to the steps specified in Section 9A of the RPA 1983 (for example, telephone, e-mail, personal canvassing outside the canvass period, etc.)
- the outcomes of the canvass

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<sup>7</sup> Arun, Braintree, Broxbourne, Castle Point, East Devon, East Dorset, East Hampshire, East Hertfordshire, East Lindsey, Eastbourne, Great Yarmouth, Gwynedd, Lancaster, Merthyr Tydfil, Mid Devon, Mid Sussex, North Devon, North Hertfordshire, North Warwickshire, Powys, Royal Borough of Windsor and Maidenhead, South Oxfordshire, Taunton Deane, Torbay, Torridge, Uttlesford, Vale of White Horse, West Devon, West Oxfordshire and West Somerset.

2.22 Similarly to in 2011, the main reasons given by those not meeting the standard for not carrying out house-to-house enquiries were:

- reduced council budgets leading to a lack of resources
- being unable to recruit enough canvassers
- the rurality of certain local authority areas

2.23 We make clear in our guidance that a lack of resources does not exempt EROs from complying with the law. We recognise the increasing budget pressures facing local authorities, which force them to make difficult choices between competing statutory services. But we do not believe that electors should not be treated differently solely on the basis of where they live.

2.24 In our guidance we advise that the ERO may decide not to conduct house-to-house enquiries where, for example, there is a potential risk to the personal safety of the canvasser. In these circumstances, however, the ERO should assess the potential for someone personally canvassing each property on a case-by-case basis, and not make blanket decisions on canvassing in particular wards or areas within the local authority. Conducting house-to-house enquiries at properties in rural areas can be a challenging task; however electors should not be treated differently solely on the basis of where they live and the rural location of a property is not, in itself, sufficient reason to avoid someone personally canvassing the property. In situations where there is an acceptable reason for not canvassing, we would expect the ERO to have an alternative strategy in place for each individual property to reach those residents.

It is particularly important that a comprehensive canvass is conducted in 2013-14 in order to achieve as accurate and complete registers as possible ahead of the transition to IER. This will help to maximise the number of electors who can be 'confirmed' during the transition, which will in turn help to reduce the number of electors that EROs will need to follow up with and invite to register individually.

We will therefore continue to focus on performance against this standard, in particular working with those EROs who have not met the standard in previous years, with a view to ensuring that they have a comprehensive written plan in place so that house-to-house enquiries are carried out where necessary. Where we find that EROs do not have such arrangements in place, we will continue to intervene to recommend improvements, but we do not have the powers to direct EROs to take steps to improve their performance should they choose not to accept our recommendations.

## 3 Integrity

3.1 Proven cases of electoral fraud are relatively rare in the UK, but electoral fraud has the potential to affect the outcome of elections (particularly where electoral contests are very close) as well as undermining trust and confidence in our democracy.

3.2 Public opinion measures continue to find that, when asked about electoral fraud, a significant minority of the public remain concerned that it is a problem. A growing group of people with experience of standing for election or running elections also remain concerned. It is unlikely that these concerns will diminish in the immediate future.

3.3 The introduction of IER in Great Britain from summer 2014 will help tackle electoral registration fraud by ensuring that details of electors' identities are verified before they can be added to the electoral register. While this change is extremely important, it may further expose the potential for other areas of the system to be exploited, particularly in relation to polling station voting and unsupervised absent (postal and proxy) voting.

3.4 EROs need to ensure that they have robust plans in place to minimise the potential for fraudulent or ineligible registration and absent voting applications to be made, to detect any suspicious applications, and to protect the registration information that they hold.

### Performance standard 4: Integrity

3.5 This standard aims to ensure that EROs have a process in place to identify any patterns of activity that might indicate electoral malpractice.

3.6 All EROs reported meeting or exceeding this standard in 2012, which is an increase from 2011 where four EROs reported not meeting the standard.

All EROs now have documented plans in place, outlining what steps are to be taken to deal with concerns about registration or absent vote applications. We are continuing to work more closely with EROs in local authority areas which we, and they, have identified as being at a higher risk of allegations of electoral fraud, to ensure that they have enhanced plans and robust processes in place. We will look at how these plans and processes are being implemented in practice, supporting individual EROs where necessary.

Drawing on lessons from our recent analysis of cases of alleged electoral fraud in the London Borough of Tower Hamlets,<sup>8</sup> we have identified a number of areas of work where EROs responsible for these higher-risk areas may need to further enhance their procedures to increase their capacity to respond to allegations of electoral fraud and to improve transparency about their electoral integrity approach. In particular, we will seek assurance from those EROs that they have in place:

- clear plans for the use of objections and reviews for registration applications and existing entries
- procedures for providing accessible information about monthly alterations to the electoral register and lists of absent voters to elected representatives and others who are entitled to receive them
- agreed procedures for receiving, investigating and escalating complaints about electoral register inaccuracies

## Performance standard 5: Supply and security

3.7 This standard aims to ensure that, once published, EROs make the full register available for public inspection and supply copies of the register and absent voter lists to those entitled to receive them, whether by right or on request, including political parties and candidates, the Office for National Statistics and the British Library. It also asks EROs to ensure that they have procedures in place to ensure that access to the register is provided in accordance with the legislation.

3.8 As in 2011, all EROs have reported this year that they meet or exceed this standard: 22% (85 EROs) are meeting the standard and the remaining 78% (298 EROs) are above the standard.

3.9 To support verification of performance against the standards, we asked the political parties on our UK Political Parties Panel, and Scottish and Welsh equivalents, to highlight to us any issues they were aware of regarding supply of the electoral register. In response to this, we received some feedback to suggest that there were instances where the register had not been supplied within the timeframes they had expected, and we followed up with the individual EROs in each of these cases to confirm that supply had been completed.

For 2013, we will work to clarify what an acceptable timeframe for supply is, consulting with EROs and recipients of the register, and will seek to confirm

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<sup>8</sup> *Allegations of electoral fraud in Tower Hamlets in 2012: Report on the outcome of investigations*, March 2013

that supply is made within these agreed timeframes when making assessments of performance against this standard.

## 4 Participation

4.1 We want every person who is eligible to participate to be able to cast their vote if they choose to do so. Encouraging people to vote is the role of candidates and political parties; however, helping people to register so that they are able to use their vote if they so wish is a fundamental responsibility of the Electoral Registration Officer and their team.

4.2 Our research shows that some groups of people are less likely to be registered than others, including young people, people from BME communities and people living in the private rented sector.<sup>9</sup> EROs are best placed to understand where typically under-registered groups live in their areas and how best to engage with them. They will have information on which other council services are already in contact with these people and will be able to identify whether there are particular voluntary organisations or community leaders who will be able to disseminate registration messages and support people to register to vote.

4.3 With the introduction of IER people will become individually responsible for taking action to join or remain on the register. They will no longer be able to rely on someone else in their household to do this for them and this may impact on levels of registration. The challenge for EROs will be to successfully engage with existing electors to ensure that they take whatever action is necessary to remain on the register, as well as identifying potential new electors and targeting under-registered groups to help maximise the number of individually registered residents on the register.

4.4 The three standards in this section are designed to ensure that EROs have: considered which of their residents might need additional support or encouragement to register to vote; put practical plans in place to achieve this by working with other council departments or partner organisations where appropriate; and made sure that all of their communications with residents are straightforward and easy to understand.

### Performance standard 6: Public awareness

4.5 This standard aims to ensure that EROs develop and maintain an effective and appropriate public awareness strategy. All but three EROs (Basildon, Broadland and Horsham) reported meeting this standard in 2012, although only seven EROs exceeded the standard.

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<sup>9</sup> *Great Britain's electoral registers 2011*, December 2011.

4.6 We will work closely with the three who are not meeting this standard before the next annual canvass begins, with a view to ensuring that they get a documented public awareness strategy in place.

Maximising the number of voters registered under IER will rely on a robust local public engagement strategy which is implemented effectively. The activity EROs undertake in the run-up to and during transition should ensure that as many residents as possible understand what they need to do to join or remain on the register. Every contact a resident receives from their ERO, as well as messages communicated through the media or advertisement campaigns, will contribute to the likelihood of them taking action.

An ERO's public engagement strategy should effectively map out who will need to be targeted and how they will do this, including how they are going to work with internal and external partners to support this. The confirmation dry-run in summer 2013 will give EROs a good indication of what they might expect in the live exercise and the results should be used by EROs to inform the development of their public engagement strategy.

## Performance standard 7: Working with partners

4.7 This standard aims to ensure that having assessed the merits of working with appropriate partners, EROs put in place plans to use expertise from within and outside the local authority to promote electoral participation. This might include working with other teams within their local authority, particularly where they have experience of working with hard-to-reach groups, other EROs and Returning Officers, the local media and community and voluntary sector groups representing groups that national and local research has shown to be under-registered.

4.8 All EROs are meeting this standard in 2012, with 107 of these EROs exceeding the standard, which is an increase from 2011 where there were four EROs not meeting this standard. To exceed the standard, the ERO is required to identify and consult with external stakeholders to help to achieve the objectives of their strategy in addition to working with other teams from within their local authority.

In advance of IER, EROs should continue to work with other parts of the local authority and they, particularly those EROs who are not currently exceeding the standard, will also need to work to identify external partners they can work with throughout the transition. We will be providing guidance, tools and templates to support EROs in doing this.

## Performance standard 8: Accessibility and communication

4.9 This standard aims to ensure that EROs communicate electoral registration information effectively and provide a simple, user-friendly way to access this information.

4.10 For the second year in succession all EROs met or exceeded this standard, with 78% (295 EROs) meeting the standard and the remaining 22% (84 EROs) exceeding the standard.

All communications whether written or in person should be clear and accessible, and emphasise the important messages. This will be crucial in the transition to IER, where EROs will need to provide correct and targeted messages to electors to maximise registration on the IER registers. By being clear and accessible, communications have a much higher chance of getting through to as many people as possible and increase the likelihood that the recipient will understand what they need to do.

# 5 Planning and organisation

5.1 The key objective for the standards in this area is to ensure that adequate preparations are made for rolling registration and the annual canvass, in order to ensure that the electoral registration process is well run and that risks are identified and properly managed.

5.2 Performance in this subject area has shown the greatest improvement since the standards were first introduced in 2008, with all EROs now having formal plans in place designed to ensure that their electoral registration processes are managed effectively and lead to the best possible outcomes.

## Performance standard 9: Planning

5.3 This standard aims to ensure that EROs have developed robust planning processes for rolling registration and the annual canvass. In order to meet the standard, EROs are required to have in place formal, written plans, with clearly defined objectives and success measures, and arrangements to evaluate the activities undertaken.

5.4 In 2012 we requested and reviewed copies of planning documentation from all EROs in Great Britain prior to the annual canvass. Following review of these documents we identified a number of issues with quality and completeness, for example, a lack of detail on timeframes and responsible officers, and instances where our planning template had been used but not amended to reflect local circumstances. We provided feedback to those EROs where the planning documents did not initially appear to demonstrate that the criteria of the standards were being met and recommended actions for improvement to ensure that robust planning documentation was in place which they could use to manage their canvass and rolling registration processes. Subsequently, no EROs were below this standard in 2012: 78% (295 EROs) met the standard and 22% (85 EROs) exceeded the standard.

It is particularly important that a comprehensive canvass is conducted in 2013/14, supported by ongoing registration activity throughout the year, to achieve as accurate and complete registers as possible ahead of the transition to IER. Continuing registration work following the publication of the revised registers in early 2014 will enable EROs to ensure that they have carried out all of the necessary steps prescribed in Section 9A of the RPA 1983, which means that the register used for the 2014 polls will be as up to date as possible. Similarly, it will benefit the register to be used for confirmation, which will help to maximise the number of electors who are successfully confirmed during the transition to IER, thus reducing the amount of follow-up work that EROs will be required to do to contact those who have not been confirmed and invite them to register.

As always, EROs will need to ensure that they have robust plans in place for the postponed 2013 annual canvass and other registration activity leading up to the 2014 polls. EROs should also review their risk registers to ensure that any additional or different risks arising from the change to the timing of the canvass and related mitigating action have been identified and are reflected.

## Performance standard 10: Training

5.5 This standard aims to ensure that EROs have provided appropriate training for staff to deliver the rolling registration and annual canvass processes.

5.6 There are no EROs that reported being below this standard in 2012, with 58% (220 EROs) meeting the standard with the remaining 42% (156 EROs) exceeding the standard. This represents a slight improvement from 2011 where 60% (228 EROs) met the standard and the remaining 40% (152 EROs) exceeded the standard.

Looking ahead, the training of staff will remain crucial in ensuring that electoral registration processes are delivered effectively. In advance of the transition to IER, EROs will need to identify support and training needs, including identifying any particular skills that staff will need to enable successful delivery of the transition.

## 6 Next steps

6.1 Given the significant change to existing processes that the transition to IER will involve, we are developing a new performance standards framework to support EROs in meeting the challenges inherent in effectively delivering the transition to IER. The new framework will apply to the transitional period only, and will be in place from autumn 2013 up to May 2015. The framework will be reviewed and updated, following consultation, with the new standards coming into effect after the May 2015 polls.

6.2 We have developed the new framework around the key challenges facing EROs in the transition; we want to focus on what EROs will need to do and know in order to effectively deliver the transition and what information EROs and the Commission will need in order to determine whether these challenges are being met.

6.3 The Commission will use the new performance standards framework to:

- review the strategies and plans EROs have in place, ensuring that a comprehensive analysis and assessment of the confirmation dry run results has been carried out and has informed their planning for the transition
- monitor the implementation of the plans and review their effectiveness
- identify where there may be issues so that targeted support can be provided to those who most need it
- inform an assessment of how effective the processes employed by individual EROs are, as well as informing a wider assessment of the effectiveness of implementation

6.4 We are committed to ensuring that EROs and their staff have the opportunity to input into the development of the new performance standards framework. We want the new performance standards framework to reflect what we, the UK Electoral Advisory Board (EAB) and the Elections, Registration and Referendums Working Group agree that EROs need to do to ensure a successful transition to IER.

6.5 Our consultation paper on developing new performance standards for EROs can be found on our website at [www.electoralcommission.org.uk/performance-standards/electoral-registration](http://www.electoralcommission.org.uk/performance-standards/electoral-registration). The deadline for responses to this consultation is Monday 15 July 2013.

6.6 After consultation on the new performance standards framework for EROs has finished, we will review the responses received, and consider any amendments as a result of those responses. We will then consult with the EAB on any amendments or revisions before publication of the performance standards for EROs in September 2013, alongside our guidance, tools and templates to support EROs in delivering the transition to IER.

6.7 We will provide guidance and tools for EROs such as templates based on national public awareness for EROs to use locally, as well as revised versions of the types of resources the Commission currently provides for EROs, which includes planning tools and resources to support canvassers. As with the guidance previously produced by the Commission for EROs, it will be designed to provide an end-to-end guide on managing electoral registration services during this period. The guidance will work alongside the new performance standards framework to support EROs in responding to the challenges inherent in effectively delivering the transition to IER. The guidance will also highlight what information and data we may request as part of the monitoring process.

The Electoral Commission  
3 Bunhill Row  
London EC1Y 8YZ

Tel 020 7271 0500

Fax 020 7271 0505

[info@electoralcommission.org.uk](mailto:info@electoralcommission.org.uk)

[www.electoralcommission.org.uk](http://www.electoralcommission.org.uk)

To contact our offices in Scotland,  
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