



Report on performance standards for Electoral Registration Officers in Great Britain

Second analysis of performance

March 2010

Translations and other formats

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Summary

Electoral registration provides the foundation for an effective democratic process. 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 Electoral Registration Officers (EROs) across Great Britain to compile and maintain complete and accurate electoral registers, and to provide this high-quality service.

The Electoral Commission's role is to monitor performance through our performance standards framework, to highlight where electoral registration is well run and to challenge EROs where the service received by electors is below standard. We provide support and guidance to enable improvements in electoral registration practice. We also highlight where the underlying framework, within which EROs have to work, does not help them and needs to be changed.

This report is our second assessment of EROs' performance against the standards we published in July 2008. Overall, this second assessment shows an improvement, compared with EROs' performance in 2008.

The performance standards framework

Running an effective electoral registration service is a significant logistical exercise, carried out by local authority staff to meet statutory timetables and requirements. Our performance standards have been developed to ensure a consistent approach across Great Britain. Prior to the standards, there had been no national monitoring or assessment of local activity.

The standards aim to ensure, for example, that EROs put in place clearly documented strategies, plans and methods that can be easily followed by staff and can be evaluated and scrutinised.

There are 10 performance standards for EROs. They were developed following extensive consultation with electoral practitioners and other groups with an interest. The standards are grouped in four subject areas representing the most important areas that EROs should focus on to carry out their registration duties:

- 'Completeness and accuracy of electoral registration records' (standards 1–3)
- 'Integrity' (standards 4–5)
- 'Participation' (standards 6–8)
- 'Planning and organisation' (standards 9–10)

We assess performance by:

- publishing a set of detailed and rigorous standards and specifying the evidence required to meet the standards

- issuing a direction to EROs to assess whether or not they have met the standards
- conducting a detailed verification and moderation of evidence from a sample of EROs across Great Britain, leading to changes where assessments are not supported by evidence

The outcome is a set of assessments that we are confident accurately reflects EROs' performance against the standards.

Performance against the standards in Great Britain 2009

This report contains a detailed analysis of performance and comparisons with last year's assessments. Our key findings from this year's analysis are:

- Performance has improved across all four subject areas with fewer EROs assessed as below any of our standards.
- Just under 96% of EROs either meet or exceed all three of the standards relating to the first subject area, 'Completeness and accuracy of electoral registration records'. This compares with 85% who met or exceeded all the standards in this area last year. For the second consecutive year, all EROs met at least one of the three standards in the first subject area.
- Performance is weakest in the participation subject area, in particular standard 6: 'Public awareness', where 41% (155) of EROs do not currently meet the standard. More than 90% of these EROs failed the standards in both years, and nearly a third of these in England and Wales were also below the equivalent standard for Returning Officers.¹
- A lack of formal planning remains an area of concern. There has been an improvement in performance for the five standards requiring a documented plan, but there remains room for improvement.

While the lack of documented plans does not necessarily indicate that activities are not being undertaken by EROs, it does mean that the extent of EROs' efforts to encourage people to register to vote cannot be effectively scrutinised or properly evaluated, meaning there is insufficient accountability.

The standards in the 'Completeness and accuracy of electoral registration records' subject area reflect the main activities required to maintain an accurate electoral register. Performance against these standards provides a solid baseline to improve performance in the other areas, such as integrity, public awareness and overall planning.

Consequently we are in the process of contacting all EROs who have fallen below certain criteria following this year's assessments, firstly to identify the reasons for poor performance and then to develop the appropriate methods to improve it. We have already published revised guidance and planning templates for EROs and ROs in preparation for the forthcoming UK general election. Our staff are also in the process of meeting with new Acting Returning Officers across Great Britain who may be inexperienced in either running a UK

¹ In Scotland, the office of ERO and RO are entirely separate functions.

general election, or are new to the role to ensure they have plans and processes in place.

Research into levels of electoral registration

In our first analysis of the performance of EROs in 2009, we noted the limited data that was available on the rates and numbers of people registering to vote. Since then, we have commissioned new research on the state of the electoral registers in Great Britain, which we publish alongside this report.² Our new research shows that:

- The completeness of Great Britain's electoral registers remains broadly similar to the levels achieved in comparative countries.
- However, national datasets and local case study research suggest there may be widening local and regional variations in registration levels.
- While there is no straightforward relationship between population density and the state of local registers, the lowest rates of completeness and accuracy were found in the two most densely populated case study areas, with the most mobile populations (Glasgow and Lambeth).
- Recent social, economic and political changes appear to have resulted in a declining motivation to register to vote among specific social groups. This is despite the fact that electors now have more options than ever open to them to register.
- The annual canvass continues, on the whole, to be an effective way to update the registration details of electors; but rolling registration, a tool introduced to maintain the register, has not prevented the completeness and accuracy of the registers declining between annual canvass periods.
- Under-registration and inaccuracy are closely associated with the social groups most likely to move home. Across the seven case study areas in phase two (therefore excluding Knowsley), under-registration is notably higher than average among 17–24 year olds (56% not registered), private sector tenants (49%) and black and minority ethnic (BME) British residents (31%).
- Each electoral register lasts for 12 months, from December to December; during that period, the rate of completeness is likely to decline by around 10 percentage points, owing mainly to population movement.
- The research did not uncover electoral fraud in the case study areas. This may indicate that where instances of registration fraud or malpractice do occur they are likely to be relatively rare, local incidents (although it may be difficult to determine intentional over-registration using a research approach). The research successfully tested new techniques which could help identify some forms of fraud.
- There is clearly scope to introduce measures locally which would improve the completeness and accuracy of specific registers. However, there are limits to what can be achieved nationally using the current registration system.

² The Electoral Commission (March 2010) *The completeness and accuracy of electoral registers in Great Britain*.

Our new research shows that, despite the greater consistency of approach as a result of the performance standards, there are some uneven outcomes in local areas that are similar to each other. We shall investigate further why this is, including considering how far the availability of local resources affects results.

Our research also shows that there needs to be more targeted local action to seek to redress the effects that social and economic change on registration levels. Our analysis of EROs' performance demonstrates the lack of local strategic plans to promote participation. This remains an area of particular concern. Improvements are vital to ensure that all those who are eligible and wish to vote are registered to do so.

We will continue to support local improvements. Since publishing our first analysis of EROs' performance in 2009, we have provided additional targeted resources, such as planning and evaluation tools, and undertaken widespread performance improvement work both with individual EROs and in groups. Drawing from our new research, we will develop further tools and give advice on methods that EROs can use to maximise their own local performance.

Developing our performance standards

The improvement currently measured by these standards relates to the processes and plans that EROs have in place. Our aim has been to ensure that EROs across Great Britain take a consistent approach to planning across all registration services. We will now refine and develop our performance standards to place greater focus on the quality outcomes that should result from effective plans and processes.

Building on our new research, we will develop our performance assessment process to assess both the electoral registration processes that are in place and the outcomes of those processes.

As we have seen performance against the standards improve, it is also important that the standards remain challenging for EROs to achieve and that we see continuing performance improvement.

1 Performance standards for Electoral Registration Officers

1.1 In April 2009, we published our first assessment against the performance standards for Electoral Registration Officers (EROs) in Great Britain.³ An introduction and background to performance standards can be found on our website.⁴

1.2 On 24 August 2009, we issued a circular directing EROs⁵ to make the second assessment of their performance against the 10 performance standards outlined below:

Table 1: Performance standards for EROs in Great Britain

| Subject area | Performance standards |
|---|---|
| Completeness and accuracy of electoral registration records | Standard 1. Using information sources to verify entries on the register of electors and identify potential new electors (referred to in the following charts and text as 'Information sources') Standard 2. Maintaining the property database ('Property database') Standard 3. House-to-house enquiries ('House-to-house') |
| Integrity | Standard 4. Maintaining the integrity of registration and absent vote applications ('Integrity') Standard 5. Supply and security of the register and absent voter lists ('Supply and security') |
| Participation | Standard 6. Public awareness strategy ('Public awareness') Standard 7. Working with partners Standard 8. Accessibility and communication of information ('Accessibility') |
| Planning and organisation | Standard 9. Planning for rolling registration and the annual canvass ('Planning') Standard 10. Training |

1.3 Acting on our first report of EROs' performance, we published revised guidance, to provide further advice and clarification in areas where we had identified it was needed. In addition, in October 2009, we published templates developed to support EROs in working towards meeting those performance standards that require specific plans.

1.4 The deadline for submitting the performance assessments was 11 December 2009, two weeks after the conclusion of the annual canvass and

³ www.electoralcommission.org.uk/__data/assets/pdf_file/0011/74099/ERO-REPORT-FINAL.pdf

⁴ www.electoralcommission.org.uk/performance-standards

⁵ The Electoral Commission (2009) EC16/2009, Direction to Report under Section 9B (1) PPERA 2000 – Performance Standards for EROs in GB.

the publication of new electoral registers on 1 December 2009. As in 2008/9, we received assessments from all EROs in Great Britain, ensuring our analysis could be based on a complete set of information.

1.5 We also asked EROs to complete an additional data collection sheet to provide contextual information. Since the 2007 annual canvass, we have been collecting data on the annual canvass return rate and on the 'carry forward rate' – that is, the percentage of canvass forms returned to each local authority compared to the number sent out; and numbers of electors who fail to respond to the annual canvass but are retained or 'carried forward' on the register for another year. We have also reported on the changes to numbers of registered electors, using data from the Office of National Statistics.

1.6 In 2009, we identified the need for more comprehensive information to assess the completeness and accuracy of electoral registers. Since then, we have commissioned new research and published a report of our findings alongside this report on ERO performance standards.

1.7 Full information about the performance of individual EROs is available on our website, where anyone can review performance against the standards in an accessible chart-based format.⁶ This tool enables comparison of performance with officers for other local authorities and also comparison with performance last year.

Verification of assessments

1.8 Once the performance assessments had been received from EROs, we carried out a verification exercise to ensure that the assessments had been completed accurately and consistently across Great Britain. We selected a sample from those officers that had not previously been visited as part of our verification work. Between receipt of the performance assessments and publication of this report, we examined the evidence from this sample and judged it against the requirements of our standards.

1.9 In England and Wales we met electoral services managers and, in the majority of cases, the ERO as well. In Scotland, all meetings were with the ERO. We discussed the assessment against the standards and reviewed the relevant supporting evidence. Following verification, we moderated the evidence across Great Britain to ensure consistency. Verification and moderation led, in some cases, to changes to assessments on the basis of the evidence supplied. These included instances of assessments that appeared to be either too high or too low. In total, 11 EROs' assessments were changed.

1.10 In the time available it was not possible to visit and verify all the EROs, but since we have started collecting performance assessments against the standards, we have in total verified evidence from nearly two-thirds of local authorities across Great Britain (this includes verification of evidence and face to face visits with both EROs and ROs). The outcome is a set of assessments

⁶ www.electoralcommission.org.uk/performance-standards

that we are confident accurately reflects EROs' performance against the standards.

Using this performance information

1.11 We analyse the information that we have collected to identify where performance can be improved, and to help support EROs in doing this. The findings from the analysis carried out last year enabled us to publish revised guidance and a series of planning and evaluation tools to assist officers in meeting the standards, as this was a weakness previously identified. We are using the findings to continue our promotion of performance improvement, especially targeting those officers who have reported lower levels of performance since last year.

1.12 Specifically, our performance improvement work is with EROs and electoral services managers who fall under the following categories:

- The ERO has assessed themselves below one or more of the three standards in the 'Completeness and accuracy' subject area, particularly if this has happened in both 2008 and 2009. Twenty EROs fell into this category in 2009 which was a reduction from 58 the year before. However, 13 of these EROs fell into this category in both years.
- The ERO fails three or more of the planning standards (standard 3: 'House to house', standard 4: 'Integrity', standard 6: 'Public awareness', standard 9: 'Planning' and standard 10: 'Training').
- The ERO has failed five or more standards. In 2009, there were seven EROs in this category, down from 41 last year. However, these seven EROs all fell into this category last year.

1.13 In some cases, we also looked at the performance of ROs in England and Wales where there is some overlap in standards. This comparison cannot be made in Scotland, where the ERO and RO function is entirely separate.

1.14 Our promotion of performance improvement also involves more detailed follow-up analysis on specific issues and trends that are identified as being a concern both across Great Britain and within particular areas. This helps us identify where more specific work needs to be done as we continue to develop our performance standards. Since the European Parliamentary election in 2009, we have arranged pre-election seminars with electoral administrators and are encouraging ROs to meet with their police contacts (to focus on integrity issues) as well as representation at regional branch meetings and county groups.

1.15 The improvement currently measured by these standards relates to the processes and plans that EROs have in place. Our aim has been to ensure that EROs across Great Britain achieve a consistent approach to planning across all registration services. We now intend to refine and develop our performance standards to place greater focus on the quality outcomes that should result from a consistent approach. Building on our new research, we will develop our performance assessment process to assess both the electoral registration

processes that are in place and the outcomes of those processes. For example, we will look at the extent to which hard data on local voter registration informs EROs' plans for conducting house to house enquiries and their plans for promoting registration.

1.16 The forthcoming introduction of individual electoral registration in Great Britain will provide more challenges for EROs. We will also review our performance standards when the practical and legal framework for collecting personal identifiers has become clearer later in 2010.

1.17 As we have seen performance against the standards improve, it is also important that the standards remain challenging for EROs to achieve and that we see continuing performance improvement.

2 Summary of performance across Great Britain

2.1 The overall performance of Electoral Registration Officer (EROs) in Great Britain is illustrated in Chart 1, which shows the proportion of officers who meet each standard. The key findings and analysis are outlined in more detail in this section. Table 2 shows the percentage change at each level from our first assessment of ERO performance published in 2009.

Chart 1: Performance of EROs in Great Britain 2009

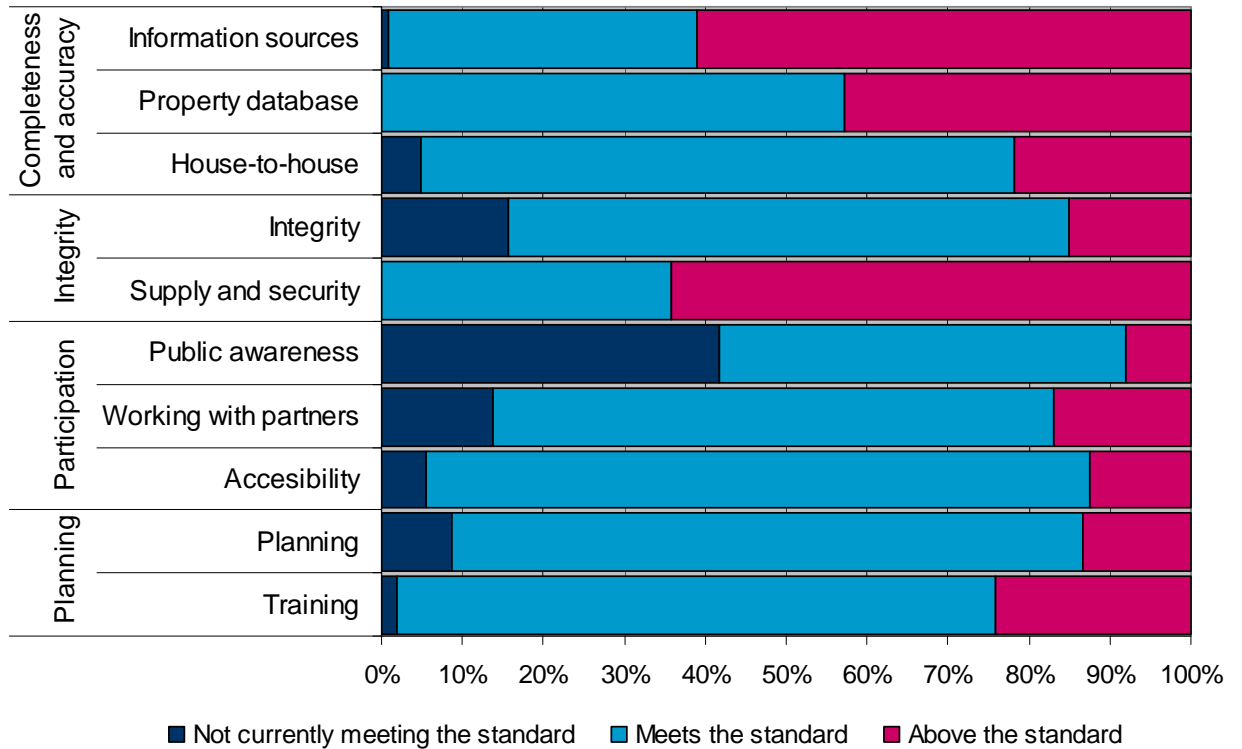


Table 2: Percentage change in ERO performance from 2008 to 2009

| | | | Not currently meeting the standard | Meets the standard | Above the standard |
|----------------------------------|----|-----------------------|---|---------------------------|---------------------------|
| Completeness and accuracy | 1 | Information sources | -3.7% | -1.8% | +5.5% |
| | 2 | Property database | -0.5% | -17.2% | +17.7% |
| | 3 | House-to-house | -9.6% | +4.0% | +5.6% |
| Integrity | 4 | Integrity | -21.3% | +17.0% | +4.4% |
| | 5 | Supply and security | -0.7% | -14.9% | +15.6% |
| Participation | 6 | Public awareness | -24.7% | +19.8% | +4.9% |
| | 7 | Working with partners | -18.9% | +13.4% | +5.5% |
| | 8 | Accessibility | -8.1% | +1.8% | +6.2% |
| Planning | 9 | Planning | -14.1% | +9.6% | +4.3% |
| | 10 | Training | -5.4% | -4.6% | +9.9% |

Note: A negative number in Table 2 indicates a reduction in the amount of EROs at that level. In the case of 'Not currently meeting the standard' a negative percentage represents an improvement.

2.2 Our analysis of the performance standards returns has identified a number of important findings:

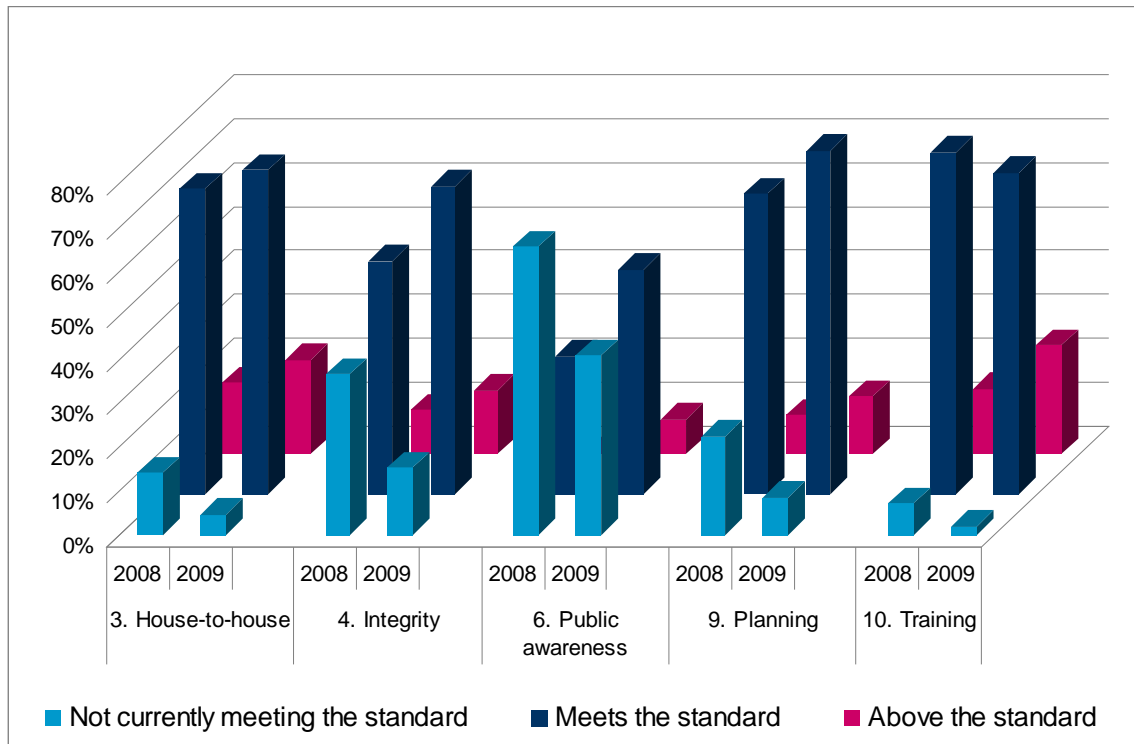
- There has been an improvement in performance across all 10 standards from 2008 to 2009.
- More than nine out of 10 (96%) EROs in Great Britain meet or exceed all three standards in the first subject area, 'Completeness and accuracy of electoral registration records'. This is an improvement from 86% last year. No ERO was below all three of these standards.
- Performance is weakest in the participation subject area, in particular standard 6: 'Public awareness', where 41% (155) of EROs do not currently meet the standard. Over 90% of these EROs failed the standards in both years, and nearly a third of these in England and Wales were also below the equivalent standard for Returning Officers (ROs).⁷
- A lack of formal planning remains an area of concern. There has been an improvement in performance for the five standards requiring a documented plan, but there remains room for improvement.
- No ERO reported 'Not currently meeting' standard 2: 'Property database' or standard 5: 'Supply and security'.
- Performance is strongest in the 'Planning and organisation' subject area.

2.3 Despite all areas improving on last year's performance, more steps need to be taken by EROs. Standard 4: 'Integrity', standard 6: 'Public awareness' and standard 7: 'Accessibility' are where many EROs need to improve.

⁷ In Scotland, the office of ERO and RO are entirely separate functions.

2.4 Chart 2 shows a comparison of performance of EROs across Great Britain between 2008 and 2009 against the standards that require a documented plan to be in place in order to be assessed at the 'Performance standard'.

Chart 2: Comparison of performance of EROs in Great Britain against the standards which require a written plan between 2008 and 2009



2.5 Chart 2 shows that in all cases the proportion of EROs below the standard has decreased. Since last year, we have produced clearer guidance to explain what is required in a plan and a further emphasis on the importance of having a documented plan. Our verification of the assessments, and other evidence we have seen over recent months, indicates that the number of EROs using our template plans or their own plans of equivalent standard is still not high. We expect to see much greater use of our template resources, published in October 2009, in preparation for the annual canvass in 2010.

2.6 The most common explanations given by EROs who have not developed formal plans in these areas are that they do not have sufficient time or resources to document their processes. In a number of cases, electoral registration staff do not see the need for formal plans, expressing confidence in their existing procedures and asserting that plans are not needed for small teams. However, it is especially important to have clearly documented plans and procedures within a small team given the reliance on individual team members and the possible impact of staff absences or departures. Further, scrutiny is difficult in the absence of documented plans and accountability is much reduced. We do not regard the reasons that are commonly given for the absence of documented plans as removing the need for them.

2.7 Our analysis of ROs performance demonstrated that there was a greater willingness among ROs to have documented plans for their work, apparently because of the high profile nature of elections. The same rigour should be applied to electoral registration and part of our continuing programme of performance improvement is to ensure that every ERO has written plans in place prior to the 2010 annual canvass.

Completeness and accuracy of electoral registration records

2.8 The first subject area covers the first three performance standards. These examine the practices used by EROs to ensure that registers are complete and accurate, using a variety of information sources and canvassing techniques.

2.9 In terms of the processes that EROs adopt to ensure the completeness and accuracy of electoral registers, our second year of analysing performance shows that improvements have been made, achieving greater consistency across Great Britain:

- Ninety six per cent of EROs met or exceeded all three standards in this subject area. This is an improvement on the 85% at this level last year.
- Nearly all EROs met or exceeded standard 1: 'Information sources' and nearly two-thirds performed 'Above the standard'.
- All EROs met standard 2: 'Property database'.
- A total of 17 EROs, (5%) do not currently meet standard 3: 'House-to-house'. Eleven of these did not do so last year.

2.10 Maintaining the completeness and accuracy of electoral registration records is one of the core responsibilities of EROs. Since the publication of last year's report, Electoral Commission staff held discussions with all 58 local authorities who reported not meeting one or more of the three standards in this subject area. The majority of EROs across Great Britain now either meet or perform above all three standards in this subject area (20 still report not meeting one or more of these standards but no ERO failed to meet all of them).

2.11 Our analysis suggests that the majority of EROs are proactive in keeping their registers updated. Nearly all EROs use the sources identified in our guidance to maintain the property database. In particular, the use of information from council tax departments to verify and validate data held on the electoral register was commonly cited as one of the records used to meet standard 1: 'Information sources', and use of the Local Land and Property Gazetteer (LLPG) or Corporate Address Gazetteer for standard 2: 'Property database'. Some officers said that they have a high matching percentage with the LLPG and, therefore, did not see the merit in using external sources. They were therefore were not able to reach 'Above the standard'.

2.12 Standard 3: 'House-to-house enquiries' is the lowest performing standard in the 'Completeness and accuracy' subject area. In 2009, a higher proportion of EROs did not meet this standard than the other two standards in this subject area. This was a repeat of the results last year. Some EROs reported that while

they are confident that they carry out the annual canvass in accordance with the legislation and guidelines, there is no comprehensive documented plan in place. Our verification of returns across Great Britain echoed these comments and found that evidence of documented plans was lacking or only included a canvass activity timetable or task list.

2.13 A weakness in formal planning and management documentation is a theme mirrored in other standards that require a written plan. In many cases the basic components of formal plans appear to be available. These now need to be consolidated and used more effectively to minimise risks for future annual canvass activities. This is an area where we will offer further practical support to EROs, through the regional and county group structure, seminars and on an individual basis.

2.14 Our discussions with EROs also suggest that although such plans may be in place, some EROs take the view that a comprehensive house-to-house canvass is not always feasible in some authorities, including rural and densely populated urban areas.

2.15 Section 9A of the Representation of the People Act 1983 places a duty on EROs to take all steps necessary to maintain the electoral register, including making house-to-house enquiries on one or more occasion to ensure that the residents present are correctly included in the register. EROs must be able to demonstrate that all necessary steps have been taken with respect to properties in their area. Where all other steps have been exhausted, EROs must ensure that appropriate resources are provided to support a personal visit by one or more canvassers – even in isolated rural areas or challenging urban situations – in order to comply with their statutory duties. Using the findings from this report and the registration research, the Commission has further work to do on the level of resources required to carry out the key functions of electoral activity.

2.16 Our new research⁸ shows that the personal canvass is an effective means of improving the completeness and accuracy of electoral registers – that is, ensuring that as many people who are entitled to vote are registered to do so. EROs may need to think more laterally about how they ensure that house-to-house enquiries are conducted. We will provide further advice to assist with this.

2.17 In a small number of cases EROs who were meeting or exceeding a standard last year have recorded themselves as below standard for this year. Reasons were provided for this, such as in one case under standard 1: 'Information sources', the impact of outsourcing of local authority financial services and this issue is being addressed by the ERO. For standard 3 'House-to-house', of the 17 EROs reporting 'Not currently meeting' the standard, five who were meeting or exceeding last year have assessed themselves below this year. Our verification work suggests that due to a greater understanding of the criteria to meet this standard, some officers have lowered their assessment

⁸ The Electoral Commission (March 2010) *The completeness and accuracy of electoral registers in Great Britain*.

from last year. This applies in particular to the need to have carried out a full canvass of all non responders where this has not been possible for resource or geographical issues.

2.18 In our first analysis of the performance of EROs in 2009, we noted the limited data that was available on the rates and numbers of people registering to vote. Since then, we have commissioned new research on the state of the electoral registers in Great Britain, which we publish alongside this report.⁹ Our new research shows that:

- The completeness of Great Britain's electoral registers remains broadly similar to the levels achieved in comparative countries.
- However, national datasets and local case study research suggest there may be widening local and regional variations in registration levels.
- While there is no straightforward relationship between population density and the state of local registers, the lowest rates of completeness and accuracy were found in the two most densely populated case study areas, with the most mobile populations (Glasgow and Lambeth).
- Recent social, economic and political changes appear to have resulted in a declining motivation to register to vote among specific social groups. This is despite the fact that electors now have more options than ever open to them to register.
- The annual canvass continues, on the whole, to be an effective way to update the registration details of electors; but rolling registration, a tool introduced to maintain the register, has not prevented the completeness and accuracy of the registers declining between annual canvass periods.
- Under-registration and inaccuracy are closely associated with the social groups most likely to move home. Across the seven case study areas in phase two (therefore excluding Knowsley), under-registration is notably higher than average among 17–24 year olds (56% not registered), private sector tenants (49%) and black and minority ethnic British residents (31%).
- Each electoral register lasts for 12 months, from December to December; during that period, the rate of completeness is likely to decline by around 10 percentage points, owing mainly to population movement.
- The research did not uncover electoral fraud in the case study areas. This may indicate that where instances of registration fraud or malpractice do occur they are likely to be relatively rare, local incidents (although it may be difficult to determine intentional over-registration using a research approach). The research successfully tested new techniques which could help identify some forms of fraud.
- There is clearly scope to introduce measures locally which would improve the completeness and accuracy of specific registers. However, there are limits to what can be achieved nationally using the current registration system.

⁹ The Electoral Commission (March 2010) *The completeness and accuracy of electoral registers in Great Britain*.

2.19 Despite the improvement in processes followed by EROs and the greater consistency achieved, this research demonstrates that there are some uneven outcomes in local areas that are similar to each other. We will investigate further why this is so, including considering how far the availability of local resources and practices affects results. We also highlight where the underlying framework, within which EROs have to work, does not help them and needs to be changed.

Integrity

2.20 The second subject area includes two standards which cover the processes used by EROs to ensure integrity in the electoral registration and absent vote application process.

- More than three quarters of EROs (85%) currently meet or exceed standard 4: 'Integrity'. This is an increase from 63% last year. However, 50 EROs did not meet the standard in both years.
- No EROs were below standard 5: 'Supply and security' (compared with 3 EROs who were below this standard last year), and just under two thirds (65%) were 'Above standard', the highest number across all ten standards.

2.21 Out of all 10 standards, standard 4: 'Integrity' had the second highest number of EROs not currently meeting the standard (15% or 58 EROs, 10 of whom met the equivalent standard last year). As we found in the previous year, most EROs who do not currently meet the standard said that they have contact with their police single point of contact and that they keep registration forms for the life of the register and absent vote applications until the application is cancelled. However, in common with other standards which require evidence of planning processes, many fail to meet this standard because of the absence of a documented plan.

2.22 To promote public confidence that electoral registers are complete and accurate, it is vital that every effort is made to ensure integrity in the processing of applications for registration and absent votes. To ensure the risks of fraudulent or ineligible registration applications are minimised, it is important to have formal plans in place for dealing with concerns about possible fraudulent registration or absent vote applications. Without advance planning, the risk is that when an instance of fraud or malpractice arises, an ERO is responding without sufficient time to think through the best course of action, increasing the possibility of errors and omissions. For these reasons, all EROs should have a documented plan to check the integrity of registration and absent vote applications. The plans should include risk assessments.

2.23 Performance at this standard was highlighted as an area for concern in our analysis of RO performance following the June 2009 elections, where 72 ROs were reported as 'Not currently meeting the standard'. In the vast majority of cases, this was for the lack of a documented plan, and this analysis highlights again that this is still an issue.

2.24 As part of our improvement work following the previous year's performance assessment of EROs, we sought to help support those EROs who failed to meet this standard. We updated our guidance (Part J, *Managing electoral registration in Great Britain: guidance for Electoral Registration Officers*) and developed a set of template plans for each standard requiring evidence of a plan, including standard 4: 'Integrity'. We will continue to promote use of these resources with EROs and ROs to assist them in being better prepared to deal with any allegations or suspicions of electoral malpractice.

2.25 All EROs met or exceeded standard 5: 'Supply and security', with just under two-thirds of EROs (65%) exceeding this standard, making it the area with the highest performance of the 10 standards.

Participation

2.26 The third subject area includes three standards which cover the processes used by EROs to encourage participation in the registration process. Section 69 of the Electoral Administration Act 2006 requires that an ERO must 'take such steps as he thinks appropriate to encourage the participation by electors in the electoral process in the area for which he acts'.

2.27 Again, there were some variations in performance against the three standards:

- Participation was the poorest performing area with more than 40% of EROs failing to meet at least one or more standards in this subject area. Eleven EROs failed all three standards, but this is an improvement on last year, where 43 EROs failed to meet any of the standards in this area.
- Just under two-thirds of EROs (59%) met or exceeded standard 6: 'Public awareness'. Although that represents an increase of 24 percentage points from the previous year and the greatest increase across all 10 standards, performance at standard 6 remains poorer than at any other.
- Almost nine out of 10 EROs met or exceeded standard 7: 'Working with partners', an increase from seven out of 10 last year.
- Ninety-five per cent of EROs met or exceeded standard 8: 'Accessibility' compared with 86% last year.

2.28 Just over 40% of EROs across Great Britain were below standard 6: 'Public awareness', the highest percentage at this level across all 10 standards. This standard requires evidence of a public awareness strategy to improve participation in electoral registration, and again the absence of a documented plan meant that many were below standard. Just under a third of EROs in England and Wales also failed the standard last year and a third of ROs failed their equivalent standard.¹⁰

2.29 Although we welcome the improvement in this area compared with last year, we remain concerned about the lack of local strategic plans to promote participation. Our evidence shows that the degree of promotional work

¹⁰ In Scotland, the ERO and RO are entirely separate functions.

undertaken varies widely. There is a minority of examples of excellent work being undertaken, often resulting from the efforts of an enthusiastic member of staff or as part of a local authority's corporate strategy to promote local democracy. However, in many instances promotional work appears to be a token approach to demonstrate that the statutory duty is being met, rather than reflecting a well thought out approach to improving registration rates in localities where they are lower.

2.30 Further, the effectiveness of tools such as advertising on buses and local radio is rarely measured, with the result that EROs do not evaluate how effective their promotional work has been. Promoting electoral registration in community newsletters in particular localities where registration is known to be lower, for example, may have a more effective outcome than spending money on advertising that is not well targeted. The absence of documented plans hinders scrutiny of the cost-effectiveness of different approaches.

2.31 In short, performance at this standard remains a concern, since our research on the state of electoral registers¹¹ indicates a clear need for more targeted local action to redress the effects social and economic change have on registration levels.

2.32 As highlighted in last year's analysis, we have provided substantial help on public awareness activities and participation issues in general, available through our Do Politics website.¹² We continue to promote these with EROs and our performance improvement work focuses on this activity.

2.33 The resources we make available to help EROs to meet standard 6: 'Public awareness' include template plans, press releases, campaign artwork, posters in different sizes (for bus shelters, billboards, notice boards etc.) press format advertisements (for use in council publications and newsletters) and other resources. These are editable and free to download at www.dopolitics.org.uk.¹³ We have also developed a 'Public awareness' pack which consolidates the existing guidance in an easily accessible format. In addition, we provide hard copy materials such as voter registration forms, leaflets about voting, and specialist educational materials.

2.34 Compared with standard 6: 'Public awareness', more EROs met standard 7: 'Working with partners' and standard 8: 'Accessibility'. Eighty seven per cent of EROs met or exceeded standard 7, an increase from 68% last year. This improvement shows that more EROs are working with other experts within local authorities, such as marketing teams. We would now like to see more initiatives with external partners and will refine and develop this standard to ensure it remains challenging to achieve.

¹¹ The Electoral Commission (March 2010) *The completeness and accuracy of electoral registers in Great Britain*.

¹² www.dopolitics.org.uk

¹³ The Electoral Commission (February 2010) EC02/2010 contains information on the tools to support the promotion of registration in the lead up to the 2010 elections.

2.35 Six per cent of EROs said that they are not currently meeting standard 8: 'Accessibility' (9% less than last year). Eighteen of these officers were below the standard last year.

Planning and organisation

2.36 The final subject area contains two standards which cover the planning and organisation functions of EROs. Both the standards require evidence of a written plan to meet the standard. Performance was strong and, in keeping with the other standards, there was a marked improvement from last year.

- The vast majority of EROs (96%) met or exceeded both standards in this subject area. Four EROs did not meet either of the standards, down from 19 in 2008.
- Just under 92% of EROs met or exceeded standard 9: 'Planning'. This was up from 75% last year
- Over 98% of EROs met or exceeded standard 10: 'Training', again an improvement from 75% last year.

2.37 Performance in this subject area was particularly encouraging given that both the standards in this area require a documented plan to meet the standard, an area identified as a weakness across Great Britain in the first assessments for EROs and ROs last year.

2.38 Standard 9: 'Planning' has the highest proportion of officers reporting that they met the standard (just over three-quarters) across all 10 standards suggesting that officers are more likely to have a documented plan for the annual canvass and rolling registration process than plans for other areas, in particular standard 4: 'Integrity' and standard 6: 'Public awareness'. This was an increase from two-thirds last year.

2.39 However, although the number of EROs who did not meet this standard reduced substantially from 91 last year to 32 this year, all but four of those also failed the standard last year. In addition, four of those officers also failed the equivalent planning standard for ROs following the European Parliamentary elections in 2009. Our verification work identified that there were three reasons for failing to meet the standard, namely:

- lack of a comprehensive written plan
- the plan covered only the annual canvass and not rolling registration
- lack of a risk register or evaluation of the plan

2.40 Only seven EROs across Great Britain did not meet standard 10: 'Training'. This was a reduction from 29 last year. However, one ERO also failed the standard last year and four in England and Wales also failed the equivalent RO standard.¹⁴ Our verification work suggests that the primary reason for an assessment below the standard remains the lack of a schedule of training activities, although some training may be undertaken. Almost all EROs

¹⁴ In Scotland, the office of ERO and RO are entirely separate functions.

offer some form of basic training to their staff, as part of their local authority staff development schemes. In some cases, staff said that they relied on training from the Association of Electoral Administrators and from the Commission, but had not documented it.

2.41 There was also an increase from 15% to nearly 25% in those EROs who were reported being above the standard, meaning that they evaluated their schedule of training activities.

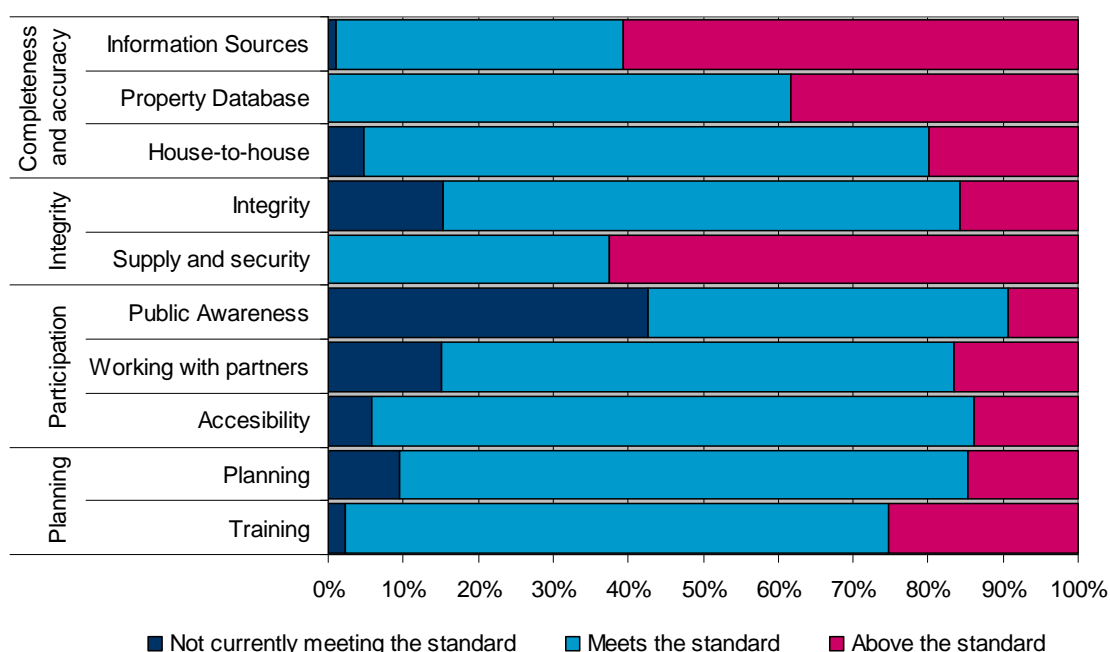
3 Performance in England, Scotland and Wales

3.1 This chapter provides information and analysis of trends and variations in performance by Electoral Registration Officers (EROs) in England, Scotland and Wales.

England

3.2 Performance against the standards by the 350 EROs in England is shown in Chart 3. The results for England are broadly similar to performance across Great Britain, which would be expected given the greater number of EROs in England compared to Scotland (32 local authorities served by 15 EROs) and Wales (22 EROs).

Chart 3: Performance of EROs in England



- only three EROs in England did not meet standard 1: ‘Information sources’
- no EROs in England failed to meet standard 2: ‘Property database’ or standard 5: ‘Supply and security’
- just under 42% of EROs in England did not meet standard 6: ‘Public awareness strategy’ and fewer than 10% of officers reported that they exceeded the standard, the lowest proportion at this level across all 10 standards

3.3 Local authorities in England are classified according to a number of different authority types, including metropolitan districts, unitary authorities, London boroughs and district councils. In Scotland and Wales, all local authorities are unitary. There are some variations in the performance of EROs in different types of authorities in England. Of the three EROs falling below

standard 1: 'Information sources', two are from metropolitan districts and the other is from a unitary authority. For standard 3: 'House-to-house' enquiries, 11 of the 12 EROs in England below the standard are from district councils.

3.4 These variations and other relevant findings are outlined in more detail below. During the coming year, we will investigate further the reasons for the variations in performance.

Completeness and accuracy of electoral registration records

3.5 Performance by EROs in England has improved in relation to the first subject area of 'Completeness and accuracy of electoral registration records', (made up of the first three standards). There is again broad consistency in the proportion of EROs, from different types of authorities, who met the standards.

3.6 Across all authority types, over half of EROs exceeded standard 1: 'Information sources', including over two-thirds of EROs in metropolitan boroughs. Only three EROs across England did not meet this standard, one from a unitary authority and the remaining two from metropolitan boroughs.

3.7 Between two-thirds and three-quarters of EROs across England met standard 3: 'House-to-house'. Metropolitan boroughs and London boroughs are slightly more likely to meet this standard with no EROs below the standard, compared with 13 (just under 6%) from district councils and one ERO from a unitary authority.

3.8 Over half of EROs in Metropolitan and London boroughs exceeded standard 2: 'Property database', while the relative proportions in district councils (30%) and unitary councils (38%) were slightly lower. Performance against this standard was strong across Great Britain with no EROs below this standard.

Integrity

3.9 Although performance against standard 5: 'Supply and security' was consistently strong among EROs from all types of authorities in England, there were more significant variations in relation to standard 4: 'Integrity'. EROs from unitary authorities and district councils were more likely not to be below standard 4 (15% and 19% respectively) compared with 6% and 3% of EROs in London boroughs and metropolitan districts. We will investigate further why this is, particularly to find out whether the lack of formal plans in place to deal with concerns about possible malpractice reflects EROs' perceptions of levels of local risk. This disparity in performance between different types of authority is similar to the previous year, although the numbers of EROs below the standard are now lower in all types of local authority.

Participation

3.10 As with performance of EROs in the previous year, there was again some variation in performance by EROs in different types of local authorities in

England, in relation to the three standards concerned with activities promoting participation in electoral registration.

3.11 More EROs in unitary authorities and district councils did not meet standard 6: 'Public awareness' (45% and 47% respectively) than the average of 41% across Great Britain, compared with 24% and 25% of EROs in London boroughs and metropolitan districts. This pattern reflects that of the previous year and is similar at standard 7: 'Working with partners'. At standard 7, more EROs in unitary authorities and district councils did not meet the standard (19% and 16% respectively), than the Great Britain average of 13%, compared with only 8% and 3% for metropolitan districts and London boroughs.

3.12 The pattern is not continued at standard 8: 'Accessibility and communication', with 9% of London boroughs below standard, followed by 6% of metropolitan districts, both of which are higher than the Great Britain average (5%), district councils (5%) and unitary authorities (4%). However, when it comes to exceeding the standard, London boroughs are more likely to exceed than other types of local authority, with 27% of EROs exceeding this standard compared to 17% in metropolitan districts, 13% in unitary authorities and 12% in district councils.

Planning and organisation

3.1 Performance is fairly consistent across the two standards in 'Planning and organisation' with EROs showing improvement across this subject area. Overall, the performance of EROs in England was strong, with over 90% of EROs saying they either met or exceeded both standards. This was broadly in line with performance across Great Britain. EROs in England were the only EROs to report that they did not meet standard 10: 'Training'.

3.2 EROs in district councils were more likely to be below both standards, while no EROs from metropolitan authorities were 'Not currently meeting' those standards.

3.3 The proportions of EROs across all local authority types below both standards decreased. EROs in London were more likely to have exceeded the standards than officers across Great Britain as a whole, with a third above standard 9, and more than half above standard 10.

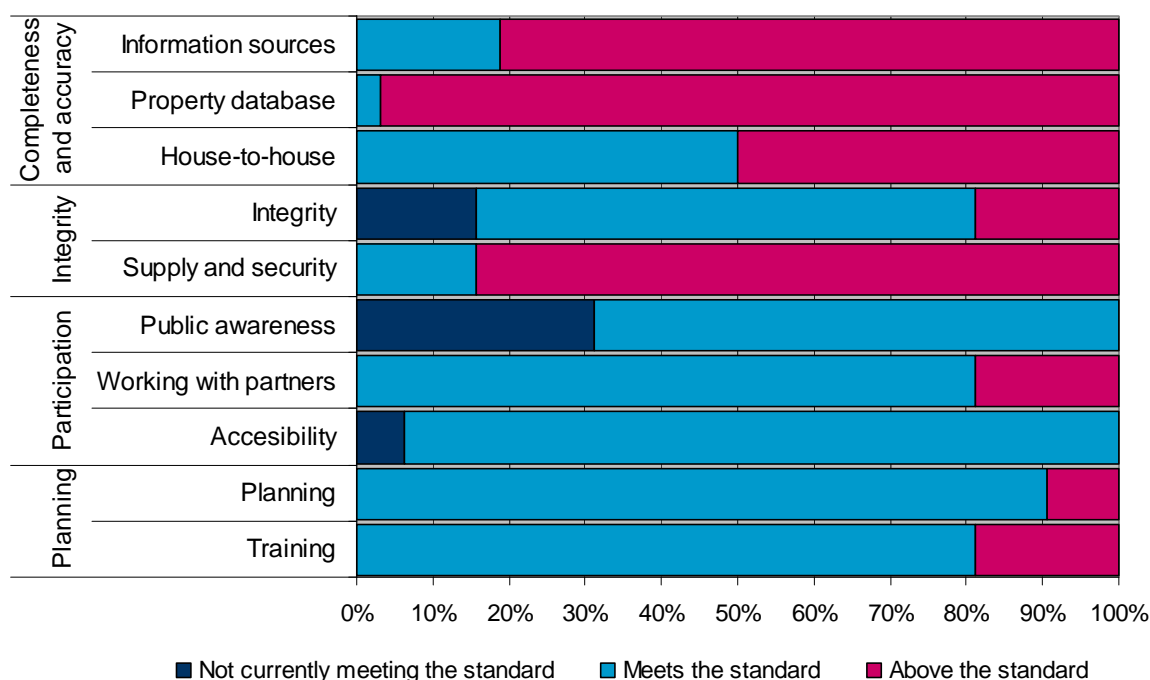
Scotland

3.4 Scottish councils may appoint either one of their officers, an officer of an adjoining council, or an officer appointed by a combination of councils, to act as the ERO for the authority.¹⁵ Currently, 10 EROs are appointed by groups of two, three or four councils, representing 27 of the 32 Scottish councils. The remaining five councils have appointed one of their own officers to act solely for their own area.

¹⁵ Section 8(3), Representation of the People Act 1983.

3.5 As the same practices and procedures are used in every area where the ERO is appointed by a combination of councils, an assessment was made for each ERO rather than for each council area, meaning that there are 15 separate assessments rather than 32. To ensure comparability of performance between EROs in Scotland and those elsewhere in Great Britain, our analysis refers to the number of EROs appointed by the 32 Scottish councils, and we have indicated where relevant if an individual officer is appointed by more than one council. Chart 4 shows performance against the standards for the EROs in Scotland.

Chart 4: Performance of EROs in Scotland



3.6 As is the case across Great Britain as a whole, there are some variations in performance by EROs in Scotland between the 10 standards:

- EROs for all 32 Scottish council areas met or exceeded seven of the 10 standards. In 2008, EROs met or exceeded only two standards in 2008.
- The majority of EROs were above three out of the ten standards, with performance being very strong in the first subject area ‘Completeness and accuracy’.
- However, EROs for just under a third of Scottish council areas (10 out of 32) did not meet standard 6: ‘Public awareness’ and none reported that they exceeded the standard.

Completeness and accuracy of electoral registration records

3.7 EROs in Scotland performed strongly in relation to the three standards which concern the ‘Completeness and accuracy of registration records’ (standards 1–3). All EROs met at least one of the standards in the subject area. EROs for 26 of the 32 Scottish council areas (81%) exceeded standard 1.

3.8 All but one ERO in Scotland met or exceeded standard 2: 'Property database'. In the majority of cases, the persons appointed as EROs in Scotland are also the Assessors.¹⁶ The Assessor is responsible for the valuation of domestic and non-domestic properties for the purposes of council tax and non-domestic rates. Both functions require the ERO/Assessor to maintain an accurate and up-to-date property database. Additional sources of information such as the Registers of Scotland are also regularly used by a number of EROs.

3.9 EROs for half of the Scottish council areas (16 out of 32) met standard 3. The other 50% exceed the standard. This is an improvement on last year where EROs appointed by five councils were below standard.

Integrity

3.10 EROs for five Scottish council areas (16%) did not meet standard 4: 'Integrity'. EROs for six Scottish council areas (19%) exceeded standard 4, one fewer than the previous year.

3.11 All EROs in Scotland either met or exceeded standard 5: 'Supply and security', with EROs for 28 council areas (88%) exceeding the standard, up from 78% last year.

Participation

3.12 EROs for just under a third of all Scottish council areas (10 out of 32) did not meet standard 6: 'Public awareness' compared with EROs for 17 council areas in the previous year. As with the previous year, no ERO performed above the standard.

3.13 All EROs in Scotland met or exceeded standard 7: 'Working with partners' an increase of 16% on the previous year. The overwhelming majority of EROs (appointed by 30 out of 32 Scottish councils) met or exceeded standard 8: 'Accessibility', with only one ERO, covering two council areas, not meeting the standard, as was the case last year.

3.14 Standard 8 is the only standard which has a slightly higher percentage of those EROs below the standard than the Great Britain average and with a smaller percentage exceeding the standard.

Planning and organisation

3.15 This was a strong area for EROs in Scotland, with no EROs below the standard for either of the two standards, an improvement from last year. The vast majority (over 90%) met standard 9: 'Planning' with the remainder above the standard. The same ERO (appointed by three Scottish councils) was above the standard in both years. Two EROs (representing six Scottish councils)

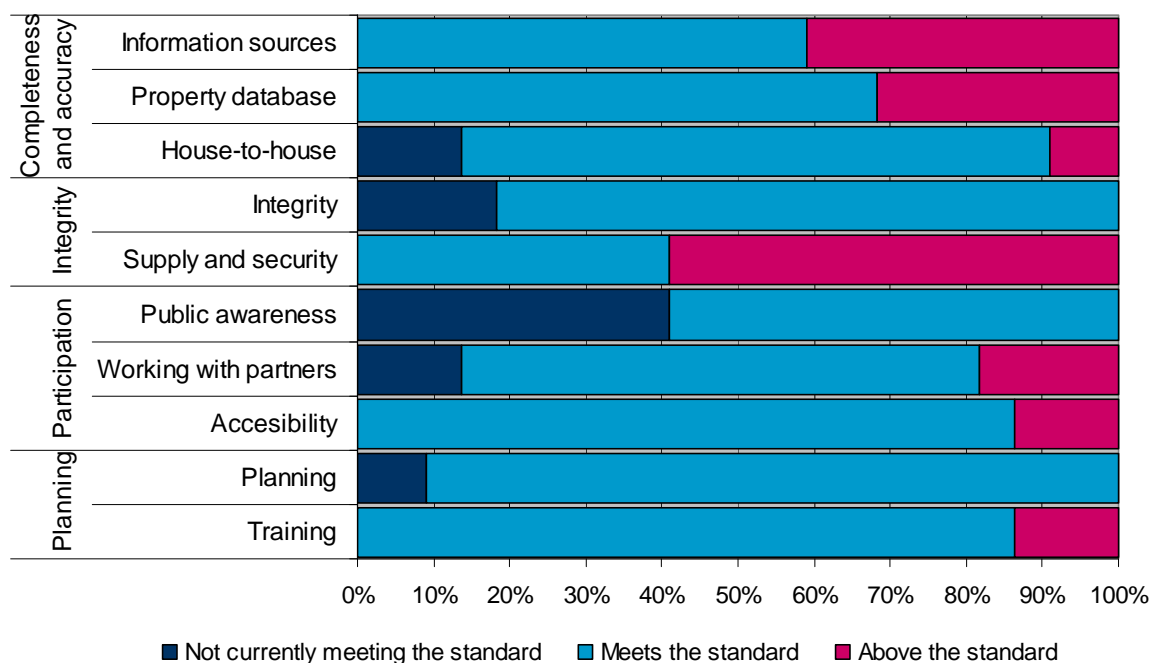
¹⁶ Dundee City Council has appointed one of its own officers to act as the ERO separate from the Assessor.

exceeded standard 10: 'Training', of which one also exceeded the standard last year.

Wales

3.16 Chart 5 shows EROs' performance in Wales across the four subject areas.

Chart 5: Performance of EROs in Wales



3.17 Again, there are variations in performance by EROs in Wales across the standards:

- all 22 EROs in Wales met or exceeded five of the standards compared to six in 2008.
- EROs reported strong performance in the first subject area, 'Completeness and accuracy', with only three failing to meet all three standards (all three were below standard 3).
- nineteen of the 22 EROs in Wales met or exceeded standard 3: 'House-to-house', while 18 met standard 4: 'Integrity'.
- No EROs exceeded standards 4: 'Integrity', standard 6: 'Public awareness' and standard 9: 'Planning'.

Completeness and accuracy of electoral registration records

3.18 All EROs in Wales met or exceeded standard 1: 'Information sources' and standard 2: 'Property database'. In Wales, standard 1 had the highest proportion of EROs exceeding the standard compared with the other nine standards, although the proportion above the standard was slightly lower than last year. Standard 2: 'Property database' saw an increase from two to seven in

the number of EROs above the standard. Eighty-six per cent of EROs (19 out of 22) met or exceeded standard 3: 'House-to-house' enquiries.

Integrity

3.19 Only four of the 22 EROs in Wales (18%) did not meet standard 4: 'Integrity' compared to 13 EROs in the previous year. As with the previous year no EROs exceeded standard 4, largely due to lack of risk assessments. Improvement on the previous year's performance can also be seen in standard 5: 'Supply and security', where all 22 EROs met or exceeded the standard. There was an increase in the number of EROs performing above the standard.

Participation

3.20 In line with the rest of Great Britain as a whole, a greater proportion of EROs in Wales did not currently meet standard 6: 'Public awareness' (nine EROs or 41%) than any of the other nine standards. This was an improvement on the previous year's performance (where 17 EROs did not meet the standard), but no EROs exceed the standard.

3.21 Eighty-six percent of EROs in Wales (19 EROs) met or exceeded standard 7: 'Working with partners', which includes four EROs who exceeded the standard. Again this is an improvement on the previous year's performance, when 13 EROs met the standard and three exceeded the standard. As with the previous year's performance, there are no EROs in Wales who failed to meet or exceed standard 8: 'Accessibility'.

Planning and organisation

3.22 Performance by EROs in Wales against the final two standards broadly mirrored the picture of performance across Great Britain as a whole. All but two EROs (down from five last year) met standard 9: 'Planning'. There were no EROs above this standard.

3.23 Similarly to last year, all 22 EROs in Wales met or exceeded standard 10: 'Training', including three who exceeded the standard. However, neither of the two EROs who were recorded as performing 'Above the standard' last year did so this year. The change resulted from the verification process. All EROs offer some form of basic training to their staff.

4 Data collection 2009

4.1 Since the annual canvass in 2007, we have also asked Electoral Registration Officers to complete an annual data collection survey. The survey has provided quantitative data giving context against the standards.

4.2 Our new research on electoral registration rates was based on detailed case studies of eight local electoral registers, to find out how complete and accurate they are.¹⁷ The research also examined national data sources on the state of registers across Great Britain. Included within those sources was the data we collected in 2007 and 2008, alongside our performance assessments. The research was conducted, however, before the collection of data alongside the performance assessments of December 2009, which is summarised below.

4.3 Our data collection survey looks at the 'annual canvass return rate' and the 'carry forward rate'. The former is the number of households who return the annual canvass form as a percentage of the number of forms sent out by the ERO. The latter is the number of electors who fail to respond to the annual canvass but are retained on the register for another year, effectively being 'carried forward'.

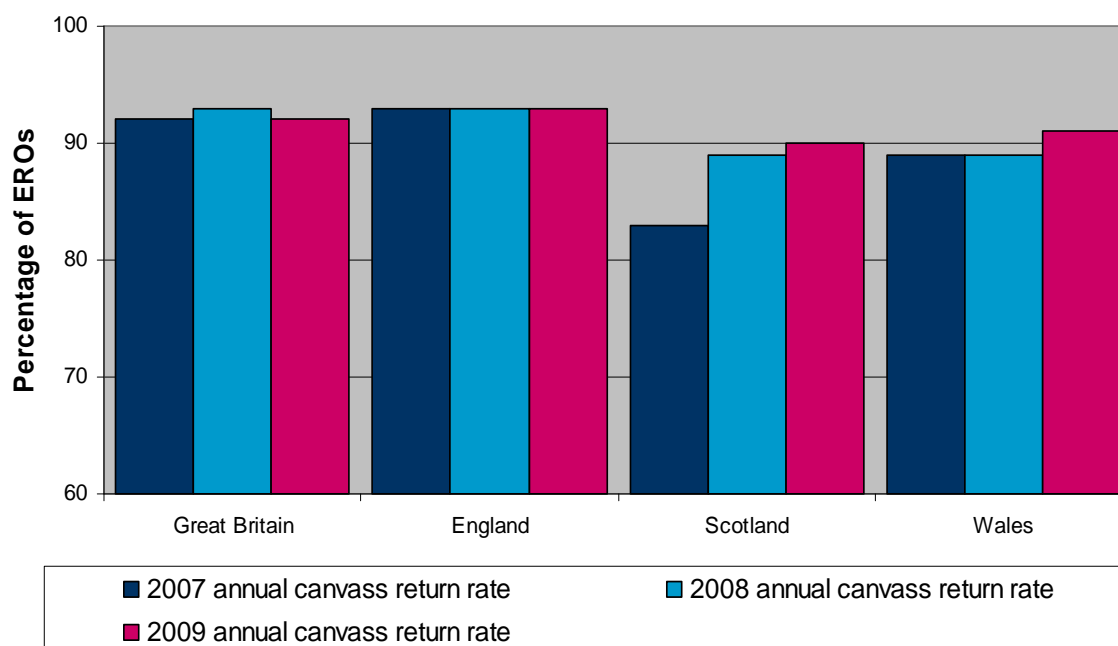
4.4 Overall, 365 data collection surveys were returned to us, representing a response rate of 96%. This section deals with our analysis of that data.

Canvass return rates

4.5 This measure helps identify the success of the annual canvass in achieving returns from households. EROs were asked to give information on the total number of households sent an annual canvass form and the number that were returned by a variety of mechanisms, including a return to canvass staff or by post. A high return rate suggests that the methods used by EROs to get the canvass forms back are working. This information is collected from EROs. Chart 6 shows the average canvass return rate for EROs from Great Britain (England, Scotland and Wales) as a percentage of the canvass forms sent out.

¹⁷ The Electoral Commission (March 2010) *The completeness and accuracy of electoral registers in Great Britain*.

Chart 6: Average annual canvass return rates across Great Britain in 2007 and 2008



4.6 The average annual canvass return rate for 2009 has decreased slightly across Great Britain to 92.5% from last year's total of 93%. Although the averages have remained fairly constant, there is a great deal of variation among EROs. Return rates ranged from 68% to 100%. EROs in England had the highest average annual canvass return rate with 92.9% of forms returned.

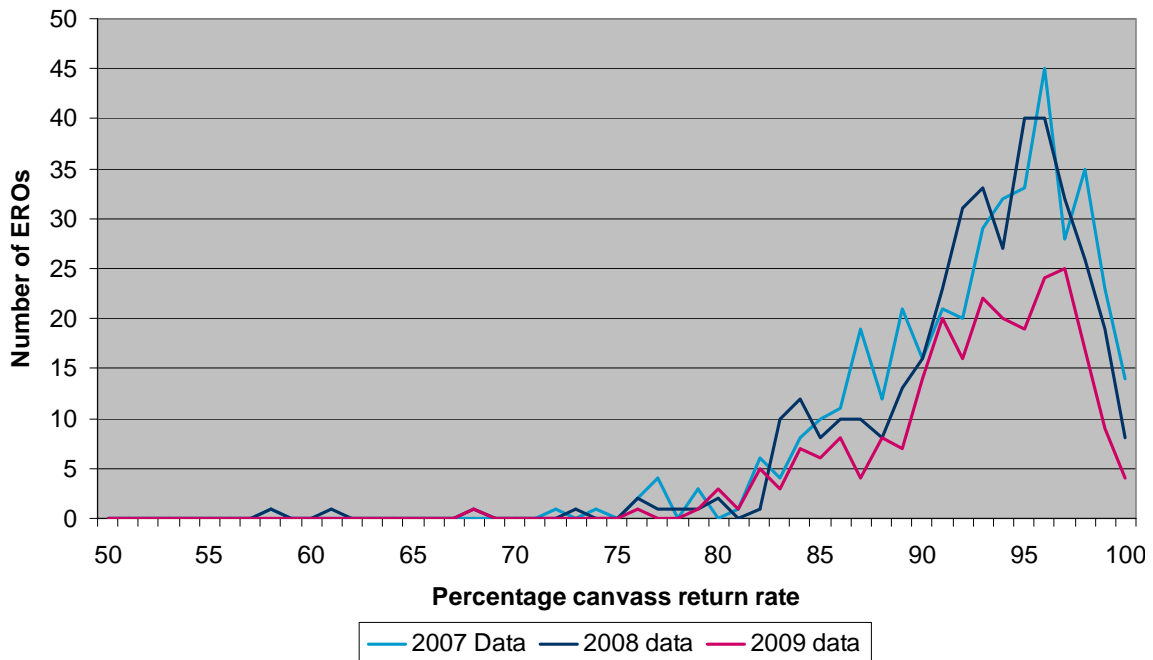
4.7 Scotland has seen a slight increase in the average percentage of annual canvass returns, to a total of 89.8%. In 2008 Scotland's annual canvass return rate increased 6% to 89% from the previous years 83%

4.8 The data that we have collected shows that the annual canvass return rates are, on average, fairly high across Great Britain. It is important however to make the distinction between the annual canvass return rate and rate at which people register to vote, which our new research examines.¹⁸ The data analysed in this section does not give an indication or provide supporting evidence for an overall 'registration rate' across Great Britain. Therefore a high annual canvass return rate does not equate to a high registration rate.

4.9 Chart 7 shows the distribution of all the results relative to the average annual canvass return rate for EROs in Great Britain between 2007 and 2009.

¹⁸ Ibid.

Chart 7: Annual canvass return rates comparison by frequency between and 2007 and 2009

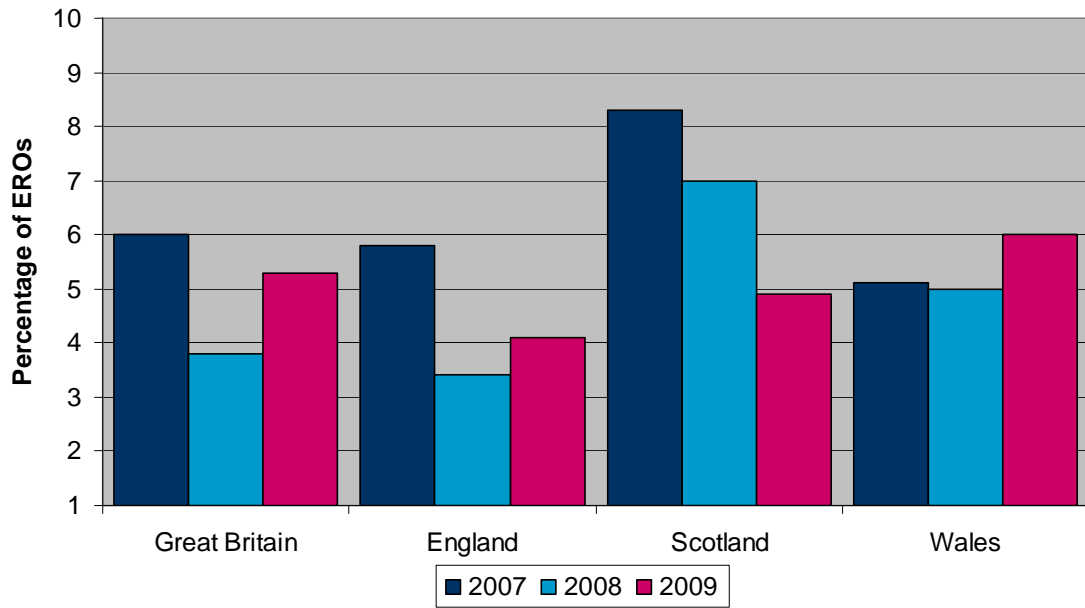


Carry forward of elector records

4.10 In the event that the annual canvass form is not returned or for any other reason insufficient information is obtained as to residence, the ERO may retain a person’s entry in the register of electors ‘for the period expiring with the publication of a revised version of the register’. This is often referred to as ‘carry forward’ of an elector’s details. This indicator measured the number of entries on the register published on 1 December 2009 that had been carried forward from the previous register.

4.11 Chart 8 shows the number of electors’ entries that were carried forward as a percentage of the number of electors on the local government register on 1 December 2009, compared with the previous year. Overall across Great Britain, the percentage of carry forwards ranged between 0% (no records were carried forward) and 19%. A small number of carry forward rates were excluded from the analysis as they were considered erroneous. On average, the proportion of records carried forward by EROs was 5%. England had the lowest carry forward percentage of 3.8%, with Scotland at 5% and Wales at 6%. Scotland has seen a 1% decrease in carry forwards, while England’s has remained roughly the same. Wales is the only country to see an increase, albeit small, from 5% to 6%.

Chart 8: Percentage of electors' entries carried forward following the annual canvass in 2007 and 2008



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