New performance standards for Electoral Registration Officers

Response to consultation

March 2016

Contents

1 New performance standards for Electoral Registration Officers (EROs)

1.1   The Electoral Commission sets standards and monitors and reports on the performance of EROs.[1] The Commission first set standards for EROs in July 2008, and revised the framework in September 2013 to support EROs in planning for and delivering the transition to Individual Electoral Registration (IER).

1.2   We have now developed a new set of standards for EROs which aim to support them in planning for and delivering well-run electoral registration services under the new IER system, applicable across Great Britain. The Electoral Commission supports the extension of these performance standards to Northern Ireland once online registration is in place. We have also designed these standards to recognise, and be flexible enough to adapt to, the evolving landscape and emerging vision for electoral registration services.

1.3   Our consultation on new performance standards for EROs set out how the proposed new framework would work and sought views on whether the proposed framework would be effective.

1.4   The consultation closed on 15 January 2016 and the new framework has now been finalised, taking into account the feedback we have received.

1.5   This paper summarises the comments we received during the consultation period and gives our response to the points that were made. It also sets out the final standards and how the new framework will work.

Background

1.6   We want people across the UK to be confident that electoral registration services are well run, in that the service is managed in a way which maximises opportunities for people to register, enabling them to participate effectively in the electoral process should they wish to do so.

1.7   Performance standards for EROs were first introduced in July 2008 with the key objective of delivering a greater consistency of practice across Great Britain. In September 2013 we introduced a revised framework to support

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[1] 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.

EROs in planning for and delivering the transition to IER. We reported in March 2014 that all EROs had the necessary strategies and plans in place and so met the first of the two performance standards which focused on understanding the particular challenges in each registration area and developing a plan for engaging with residents which responded to these challenges. Between reporting in March 2014 and the publication of the 1 December 2015 register, we monitored the delivery of these strategies and plans. In February 2016 we reported that of the assessments finalised at that point in time, the vast majority of EROs demonstrated that they had effectively delivered their strategies and plans and so had met performance standard 2. Assessments against performance standard 2 will continue and be published in the summer 2016.

1.8   The Commission is not required to set and monitor performance standards – we have a statutory power to do so, not a duty – but we intend to continue with this work, particularly in light of the continuing improvements seen since 2008, and have developed a new set of standards which aims to support EROs and which is capable of embracing change, recognising that revisions to the standards in the future may be necessary to support the changing landscape and vision for electoral registration services as they develop.

1.9   For example, the Minister for Constitutional Reform has set out a vision for the future of electoral registration and how it can be modernised so that it meets the demands and expectations of 21st century voters[2]. The Commission supports the ambition of continuing to improve the system of registration, delivering a better service for electors and making it more efficient and we have been working with Government officials as specific work stemming from the vision is developed.

1.10 The UK Government also intends to explore through pilot schemes ways to improve the efficiency of delivering electoral registration under IER so that associated costs can be reduced while simultaneously having an equivalent or improved effect on the accuracy and completeness of the register. We support the principle of testing alternative approaches through a coherent programme of well-planned pilots and will evaluate the schemes, as required under the legislation.

1.11 In addition, the Law Commissions of England and Wales, Scotland and Northern Ireland have been carrying out a review of electoral law and have recently published their recommendations for electoral law reform. We very much welcome the reforms outlined by the Law Commissions and believe that they will address many of the difficulties with the current law. We have been working closely with the Law Commissions on this project as it has

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[2] https://www.gov.uk/government/speeches/vision-for-electoral-registration-speech-by-john-penrose

progressed, and we strongly support its objectives and the unique opportunity it presents to improve and modernise electoral law.

1.12 The performance standards framework must also be sufficiently flexible to recognise that EROs for some areas will face additional challenges at a level beyond that which would be expected for others. For example, we will continue to focus our electoral integrity support and monitoring work in areas where there has been a history of allegations of electoral fraud and where the risk of further allegations arising is higher. EROs and ROs in these areas have significant experience of preventing and detecting electoral fraud and work harder to minimise the risk of allegations arising, and the performance standards framework should be able to recognise the additional work which is required in these areas.

2 Summary of consultation responses

Overview

2.1   Under Section 9A(3) of the Political Parties, Elections and Referendums Act 2000 (PPERA), the Commission is required to consult with the Secretary of State and any other appropriate person before determining or publishing standards of performance for EROs.

2.2   We wrote to the Secretary of State seeking views on the proposed performance standards and in addition, the paper was also sent to all EROs and to a number of agencies, professional bodies and representative organisations. In addition to obtaining feedback through discussions with stakeholders from across the electoral community during the consultation period, we received 20 responses to our consultation from a range of organisations and individuals including: EROs and local authorities; John Penrose MP, Minister for Constitutional Reform; the Association of Electoral Administrators (AEA); and the Scottish Assessors Association (SAA).

2.3   The consultation paper asked respondents to consider a number of questions on the proposed performance standards framework, including:

- whether the proposed framework focussed on the right outcomes and whether the framework would help to ensure consistency in service for electors while still recognising varying local circumstances

- whether the documentation and data set out in the framework would be useful to EROs and whether there would be any issues in supplying any of the documentation/data

- whether respondents had any suggestions for methods of calculating the accuracy and completeness of the registers or examples of using target-based standards to drive improvements in electoral registration services

2.4   This chapter summarises the responses we received. Appendix A sets out the new performance standards for EROs, which are unchanged from those published in the consultation paper.

Key themes

2.5   Respondents welcomed the proposed framework and the focus on two standards, developed around key outcomes, which mirror a similar approach and structure to the previous standards, which was recognised as having worked well.

Pressures on local government budgets

2.6   Many respondents highlighted the continued and significant pressure on budgets and the impact on the cost of delivering a well-run electoral registration service and meeting the Commission's performance standards.

2.7   Evidence from our research and performance standards assessments suggests that EROs are working harder, and at greater cost, simply to maintain current levels of accuracy and completeness. As highlighted by a number of respondents, at the same time, local authority budgets – which fund the majority of electoral registration activities – have been significantly reduced; local authorities and EROs must consider and justify funding for electoral registration against a range of other important statutory duties. We understand the Cabinet Office will continue to provide central funding to cover the additional cost burden of individual electoral registration.

2.8   We recognise the increasing budgetary pressures facing local authorities, which force them to make difficult choices between competing statutory services. Whilst we appreciate the significant challenges faced due to these pressures, the local authority that appointed the ERO must, by law[3], provide the ERO with the resources needed to discharge their statutory functions, and any expenses properly incurred by an ERO in the performance of their functions must be paid by the local authority that appointed them. These functions include the duties of the ERO that are set out in legislation. Whilst the existing legal requirements and processes remain we will continue to monitor EROs against these, taking into consideration the context and local challenges faced by each ERO when making a final assessment of performance against the standards. For example, under the previous framework, EROs were required to demonstrate that the canvass had been carried out in accordance with the legislation. We followed up with a number of EROs where we had information that indicated that this may not be the case, to establish what happened in practice and why. In making a final assessment of performance against the standards we took into account a number of factors, including: the extent of house-to-house enquiries that were carried out; the details of planned actions to follow up with those households that did not receive a personal visit from a canvasser; and the overall outcomes of the canvass.

2.9   Under the current registration system, it remains important that EROs ensure a full and effective personal canvass is carried out, with personal visits by canvassers undertaken where household enquiry forms (HEFs) and invitations to register (ITRs) have not been responded to. We will continue to focus on the need for EROs to undertake proper planning for this activity, taking into consideration the local challenges faced by EROs and what activity is appropriate for their particular local circumstances.

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[3] s52 Representation of the People Act 1983 (RPA 83)

2.10 However, as set out in more detail below, the UK Government intends to explore options to improve the efficiency of delivering electoral registration under IER so that associated costs can be reduced while simultaneously having an equivalent or improved effect on the accuracy and completeness of the register. The Commission supports the ambition of continuing to improve the system of registration and we recognise that revisions to the standards in the future may be necessary to support the changing landscape and vision for electoral registration services as they develop.

2.11 In addition to setting standards and monitoring and reporting on the performance of EROs and ROs, the Commission also has the power to collect information from EROs and ROs on the costs of delivering their statutory electoral registration and election functions.[4] We collected data from EROs and ROs, at the end of each financial year, from 2007/8 to 2010/11. In collecting this information we aimed to ascertain the costs required to deliver electoral administration functions across Great Britain. However, variances in the quality and completeness of the information provided, coupled with the fact that in each year we did not receive a full set of returns, limited the usefulness of the data.

2.12 We now intend on looking again at this piece of work, to review what and how we may collect information on expenditure from EROs and ROs. In particular, how we can establish a mechanism to collect expenditure data which can provide us with more detailed information on spend and the activities it relates to, including how this impacts on performance, and potentially with a view to informing future improvements to the registration system. We aim to have a framework for the collection and analysis of such information in place to be able to collect returns at the end of the 2016/17 financial year.

Flexibility of the new framework

2.13 Respondents welcomed our commitment to ensuring that the framework would be flexible enough to reflect the changing landscape in which electoral registration services are being delivered.

2.14 The new performance standards were designed for use with the current system of electoral registration. However, as set out in the consultation paper, whilst we believe that the new framework can be flexible enough to accommodate changes we recognise that revisions to the standards in the future may be necessary to support change as the system continues to evolve. In addition, the monitoring and reporting against the standards will help to inform further improvements to the registration system.

2.15 We recognise there are changes that can be made to the current processes to further improve the electoral registration process across the UK.

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[4] Section 9C of PPERA the Political Parties, Elections and Referendums Act 2000 (PPERA), as inserted by Section 67 of the Electoral Administration Act 2006 (EAA).

The Minister for Constitutional Reform has set out a vision for the future of electoral registration. The Commission supports the ambition of continuing to improve the system of registration, delivering a better service for electors and making it more efficient. We have been working with Government officials as specific work stemming from the vision is developed.

2.16 A number of respondents raised specific concerns about how the standards would apply to those EROs who are involved in the planned registration pilots for 2016. We have been working with Cabinet Office as they set up pilot schemes to test changes to the existing annual canvass processes. The Commission will have a statutory role in evaluating these pilots. Once the scope and scale of the overall scheme and individual pilots is more settled the Commission will work with individual pilot areas to establish how the performance standards framework will apply to them and how it will interact with any pilot evaluations. We will aim to co-ordinate any data collection and other requests for information in order to minimise the burden on individual teams within local authorities.

Objectives of the new framework

What we proposed

2.17 The new framework was developed around key outcomes from the perspective of ensuring that all eligible people are able to participate in the electoral process, should they wish to do so, and of achieving electoral registers that are as accurate (including ensuring no fraudulent entries on the electoral register) and complete as possible. We proposed that the new standards focus on the following two key areas:

- Framework for the delivery of registration activity
- Delivery of registration activity to maintain accurate and complete registers

2.18 The paper also set out how we will continue to collect data from all EROs as in previous years. The new performance standards set out the type of data which we would expect to collect to help us to understand the scope and scale of the challenges facing each ERO and what progress is being made in response to these. We also explained that it is important that EROs are using this data to understand their local challenges and to inform their public engagement strategy, assisting in monitoring and evaluating the progress made and identifying where amendments to plans are required and that EROs would be able to use the data set out in the framework to report locally.

What we sought views on

2.19 We asked respondents whether the framework focuses on the right outcomes and whether it would help to ensure consistency in service for electors while still recognising varying local circumstances.

What the consultation responses said

2.20 Respondents welcomed our commitment to ensuring that the framework would be flexible enough to ensure that varying local circumstances are recognised.

2.21 Whilst there was general agreement that the framework focuses on the right outcomes, as highlighted above, a number of respondents raised concerns regarding the potential flexibility of the framework to be able to respond to any changes in electoral registration processes. As discussed above, we will keep the framework under review to ensure that any changes that may be needed to support change to the system are reflected in the performance standards. Where we identify that a change to processes requires a new performance standards framework, we will develop and consult widely on a proposed new performance standards framework to reflect any changes to the system. For more significant potential changes involving primary legislation, we will have time to review the standards against these, making amendments accordingly and following consultation.

What the ERO needs to do

What we proposed

2.22 The consultation paper set out what information we would expect to collect to understand the scope and scale of the challenges facing each ERO and what progress is being made in response to these.

2.23 The consultation paper also set out that the approach to monitoring against the new standards in 2016 will be based on our current risk-based approach, working with EROs highlighted through risk assessments to ensure that support can be provided where it is most needed.

2.24 We also explained that we want to consider other mechanisms through which we can identify issues, provide support and share practices that we know work. For example, we intend to continue to work with bodies such as the AEA, the Society of Local Authority Chief Executives (SOLACE) the Electoral Management Board for Scotland, the SAA and, as further regional or sub-regional structures are established in England and Wales, we would want to explore what role they could play in supporting the effective delivery of electoral registration.

What we sought views on

2.25 As part of the consultation we sought views on whether the documentation and data listed in the proposed standards would be useful to EROs, how often it should be reviewed and whether there would be any difficulties in supplying any of it. We were also keen to hear whether the collection of the documentation/data represents an additional cost for EROs.

2.26 We also asked whether a risk-based approach to monitoring was the right one and if so, whether respondents had any views on specific factors that should be taken into account in assessing risk.

2.27 In addition, we welcomed views on the proposed approach to identifying issues and delivering support and whether there are any other mechanisms for doing so that should be explored.

What the consultation responses said

Demonstrating how the outcomes have been met

2.28 The majority of respondents agreed that the collection of data did not present any particular concerns, particularly if the collation of the data is automated. In addition, the AEA provided suggestions of other data that could be considered relating to the number of potential electors identified who failed to register:

- The number of ITRs outstanding after the reminder and personal visit stages
- The number of electors not verified and awaiting documentary evidence/attestation route
- The number of individuals identified from a HEF or other data source but who failed to register online or respond to an ITR.

2.29 We have attempted to collect this or very similar data to the list suggested above for the 2015 canvass and there is still work ongoing to ensure that the collection of this particular data will be useful to both us and EROs. As highlighted in our report on the December 2015 electoral registers, published in February 2016[5], we encountered issues with the management information functionality of some Electoral Management Software (EMS) systems which EROs use to manage their electoral register. We therefore did not receive a full and accurate dataset from all EROs and there is still a lot of work to do in ensuring we can collect this type of data efficiently in the future. We will continue to work with EMS suppliers and the Cabinet Office to ensure that the requirements as set out in the new framework are included in the development of EMS systems, and so EROs will be able to easily extract and review the data.

2.30 A number of respondents highlighted that where we ask for the 'Number of household enquiry forms issued and responded to and applications made as a result', consideration needs to be given to the number of electors who will automatically register online and not return the HEF. As set out in our consultation paper, we recognise that many people will not respond to a form but go online immediately and that systems would need to be further developed to accurately capture and count these types of interactions. Whilst

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[5] Assessment of December 2015 electoral registers in Great Britain, February 2016.

we accept the limitations regarding this element of the data, it remains a useful piece of contextual information in relation to the effectiveness of the household enquiry form process.

2.31 In addition, the AEA proposed that performance standard 2 should include the Commission's definition of 'timely' with reference to the requirement 'timely supply of the register to those entitled to receive it'. As the AEA set out, the definition is provided in our guidance for EROs and we therefore do not feel that it is necessary to determine a formal timeframe within the standard, and would be keen to ensure that the standard remains flexible to allow us to take local factors into account in our assessment of performance.

2.32 The SAA requested clarity on the part of the standards that makes reference to the use of 'direct contact methods'. To clarify, this activity would include such contact as household notification letters or any other methods of direct contact in order to determine the accuracy of entries and encourage applications from new electors.

2.33 Concerns were raised by a number of respondents about supplying the other documentation listed and that collation and provision of the information was time consuming, diverting resources away from core work. In addition, one respondent, the AEA, highlighted that there was not a clear 6 months between the publication of the new standards (mid-March 2016) and when we would expect EROs to provide copies of documentation for the 2016 canvass (mid-June 2016).

2.34 We believe it remains important for EROs to have a clear understanding of the particular challenges in their registration area, demonstrated by having in place a strategy for responding to these challenges and supported by robust project planning documentation. The new standards, and documentation to demonstrate that the outcomes of the standards have been met, do not differ substantially from the previous framework. From our performance monitoring during the transition to IER we know that all EROs have these documents in place. We do not therefore expect that EROs will have to create new documents, but should be able to use their existing strategies and plans, updating them as necessary to reflect their challenges going forward. Therefore we do not believe that it is necessary for a clear 6 month period between the publication of the new standards and when we would expect EROs to provide copies of documentation. On the other pieces of information listed in the standards, these should be able to be demonstrated through the public engagement strategy and overall project planning documentation.

2.35 In addition, a number of responses asked for clarity on the timing of the collection of information and data. Further information on the timeframes for this can be found in Chapter 3 – What happens next.

Risk-based approach to monitoring
2.36 There was continuing support for our risk-based approach to monitoring performance of EROs. One respondent, the AEA, did highlight that in taking

this approach some EROs that could be in need of support may not be identified and that consideration of the risk criteria set out in the consultation may not always mean that such an ERO is in fact high risk. Whilst our initial monitoring takes a risk based approach, where we identify any EROs who were not originally highlighted as requiring focussed support but where the available information highlights risks to delivery – such as through local intelligence – we will follow up with these EROs to ensure that support is provided to those EROs who need it. In addition, to clarify, the key factors set out in the consultation paper which inform our risk-based monitoring are not an exhaustive list, and each ERO is considered on a case-by-case basis by our local teams across England, Scotland and Wales, taking into account a range of factors and any local circumstances that we are aware of.

Support

2.37 Respondents were keen that the framework should enable the sharing of practices that we know work and that these mechanisms would be valuable to support EROs. We are keen that examples of effective practices are identified, evaluated and shared across the electoral community building on the approach developed during the transition to IER, where we identified examples of effective engagement strategies and implementation plans and made these available for use to support other EROs. We are currently working with EROs to identify examples of what works and facilitate the sharing of these as part of our wider guidance and support package.

2.38 As is currently the case, support will continue to be provided through our teams in Northern Ireland, Scotland and Wales and across England. In addition, we will also continue to keep our guidance – which is developed in close consultation with EROs and electoral administrators through the UK Electoral Advisory Board (EAB) and the Elections, Registration and Referendums Working Group (ERRWG) – and supporting tools and templates, including a template public engagement strategy and project plan, under review, updating them as necessary to reflect the new standards.

Target-based standards and calculating accuracy and completeness

What we proposed

2.39 Our consultation paper set out that in developing our approach to monitoring any new standards we have again considered the appropriateness of individual targets for EROs. Our analysis of data in previous years suggests that individual targets would run the significant risk of being misleading or inappropriate for many areas and we therefore do not believe that fixed numerical targets such as response rates to issued forms, numbers of electors added to the registers or the number of electors deleted would improve the effectiveness of the monitoring we already carry out.

2.40 In addition, our consultation paper also set out that we had considered specifically whether it is feasible to set targets in relation to levels of accuracy and completeness of the registers. The paper set out the options for carrying out this work including house-to-house surveying, using census data to match against electoral register entries and comparing ONS mid-year population estimates with the total number of entries. However, the paper identified the issues with each of these options and therefore we remained of the view that setting and measuring these targets for individual EROs was entirely unfeasible.

What we sought views on

2.41 As part of the consultation we invited views on whether there are any alternative methods of calculating the accuracy and completeness of electoral registers or examples of using target-based standards to drive improvements in electoral registration services.

What the consultation responses said

2.42 Whilst many respondents could see the benefits in using targets for registration locally, we did not receive any suggestions on how such targets could be used appropriately within a performance standards framework, given the reasons set out in the consultation paper. Therefore, the majority of respondents agreed that target based performance standards would not be appropriate as part of the framework.

2.43 However, as set out in our consultation paper, we will continue to use registration data in helping us understand the scope and scale of challenges and the effectiveness of the mechanisms employed by each ERO – such as during the canvass period. For example, we already use data to inform our risk profiling of EROs and will continue to develop that. The table below sets out some of the data we could use to inform risk profiling as well as some fo the reasons why it is problematic to go further and set targets.

Metric to be used	Commentary
Numerator: **17+ population estimate** (Source: most recent available ONS mid-year estimates) adjusted for eligibility using census passport data (Source: ONS 2011 passport data) Denominator: **registered electorate** (Source: ONS/EC registration data)	This has been previously suggested as a headline measure of the completeness of a register. It is possible to calculate a crude eligibility adjustment on population using data from the 2011 census on the proportion of population holding a passport from a country whose citizens are not allowed to vote. This allows us to estimate the eligible population of an area. The adjustment assumes that anyone not holding a passport at all is eligible as they are more likely to be permanent residents of UK.

	However, while the adjustment improves this measure as a proxy for the completeness of an area's register it cannot take into account the level of inaccuracy on any given register. For example, any calculation still assumes that in an area with a registered electorate of 80,000, all 80,000 are correctly registered at their current address. The measure is still therefore imprecise and can only be used as a loose guide to likely register quality. But used as a guide it could be helpful as part of a suite of data in risk profiling.
Volume (and %) of population who changed address in the previous 12 months (Source: ONS change of address data 2011) Compared against **Volume (and %) of additions to and deletions from an electoral register in 12 month period** (Source: EC/CO MI data)	This is a crude measure of how well registration activity has kept up with likely levels of population churn in any given area. The calculation assumes that the level of population change recorded for the year preceding the census is broadly indicative of ongoing levels of change for any given area (updated data is not available). This may also underestimate the level of change in some areas as the data only counts one move per year, per person. In addition to the census data this requires an annual collection of accurate data on additions to and deletions from the registers. While imprecise this could be useful as a indicator of areas where registration activity is not effectively coping with home movers.
Numerator: **Number of residential addresses which have no registered electors** (Source: EC/CO MI data) Denominator: **Total number of residential addresses** (Source: EC/CO MI data)	This could be a proxy measure for the completeness of a register in that it shows the proportion of households where there are no eligible electors registered. It is clearly useful, at a a minimum, as a piece of data to query with an ERO. However, there are several issues with using it as a precise measure of

	performance.
	For example, data collected following the 2015 canvass indicated some areas with a high proportion of properties with no registered electors. But discussions with these authorities indicated that this was solely the result of recently built properties being entered onto the property database that the EMS system uses as part of the register. In these cases the figure was therefore clearly misleading.
	It is also possible that in other areas the volume of second homes would make a high number of properties with no registered electors not only likely but correct.

2.44 The AEA proposed that target-based standards could still be useful in monitoring and comparing canvass performance and suggested that the most appropriate indicator of whether the register is accurate and complete is whether all eligible electors wishing to vote at an election are registered and are able to do so. Therefore, they suggested gathering data on residents who come into a polling station but are not registered.

2.45 We have attempted to collect such data, as part of our regular post election data collection exercises in previous years, with varying degrees of success. We have encountered issues relating to the availability of such data for all areas holding elections as well as problems with the accuracy and consistency of the data collection process at polling station level. We welcome the AEA's support for this as an important piece of data and will be keen to work with them to explore ways of improving the collection of it at future elections.

2.46 However, even if we were able to resolve the issues with data accuracy it is important to note that the data will only indicate a problem after an election. Also, the usefulness of the data in telling us about the completeness of the register will vary depending on the level of turnout at different elections – as it may show no-one who is unable to vote at a local election and a different picture at a UK parliamentary general election when many irregular voters turnout.

2.47 We do however remain open to suggestions and will continue to explore options as they arise for other methods of calculating the accuracy and completeness of the registers and setting targets.

Making assessments of performance

What we proposed

2.48 In line with our current assessment and reporting procedures, we will establish a panel of representatives from the EAB to consider assessments, particularly in those cases where it appears that an ERO does not meet one or more elements of the standards. We would then write to EROs setting out our assessment of their performance against the standards, giving each ERO an opportunity to comment. As is current practice, any representations received would be considered on a case-by-case basis and responded to before a final decision is made ahead of publication.

2.49 As with previous years, we will then report on the performance of EROs.

What we sought views on

2.50 We asked respondents for their views on our proposed approach to making assessments of performance.

What the consultation responses said

2.51 While we received very little feedback regarding our proposals on making an assessment of performance, a number of respondents suggested that the resources available to an ERO should be taken into account when making an overall assessment of ERO performance, and that this assessment should also include an assessment of the value for money achieved by an ERO in their management of electoral registration services. As discussed in further detail in paragraphs 2.6 – 2.10 above, when making a final assessment of performance against the standards, as is currently the case, we will consider the context and local challenges faced by each ERO balanced against legal obligations.

2.52 In their response to the consultation, the AEA did raise concerns regarding finalising assessments in the period after the publication of the December registers, suggesting that (as laid out in para 2.44 above) the measure of performance should be post poll instead. Whilst we agree that there is value in collecting data relating to the number of people who were unable to vote at a particular poll, and welcome the AEA's support in helping to ensure that this data is robust, by only assessing performance after a poll we will lose our ability to support EROs in managing electoral registration issues before the poll itself takes place.

2.53 Whilst the December registers are a useful snapshot of registration activity, we appreciate that work continues beyond this date, and our standards are designed to be flexible enough to take account of this. As we have already noted, we are keen to keep our framework under review as appropriate as the registration process evolves. Our focus remains on providing on-going support to EROs all year round to ensure delivery of well-

run electoral registration services. By identifying EROs who need additional support this will enable us to provide appropriate targeted support to those who need it most.

2.54 The AEA also noted that electoral administrators have expressed that it would be helpful to receive feedback as a result of assessments against the standards, in particular, administrators find that very little information is given back to them or recognised in terms of the areas on which they have done well and on the areas where they might improve further. The aim of the standards is to support EROs in planning for and delivering well-run electoral registration services, in particular those EROs who most need support which is in line with our risk-based approach to monitoring. For those EROs identified as forming part of the risk-based monitoring, feedback and support is subsequently provided to each of these EROs as appropriate through structured conversations, addressing any concerns that may have arisen during the review of documentation and data. On-going dialogue throughout the period also enables us to better understand local challenges faced by each of these EROs and progress with delivering their plans. Whilst we are unable to provide feedback to all EROs who are not part of the risk-based monitoring, those who specifically seek feedback on performance are welcome to contact us.

2.55 For those EROs who are assessed as not meeting the standards we will continue to support them, working with EROs, where necessary, to recommend improvements and to help them to put arrangements in place to ensure the effective planning for and delivery of well-run electoral registration services. In addition, our local teams across England, Scotland and Wales will be able to support all EROs in understanding their data and using it to understand their local challenges, informing their registration activity going forwards.

2.56 The AEA noted that whilst each ERO will be given the opportunity to comment on their assessment and any representations received will be considered on a case-by-case basis, it does not form a formal independent appeal process in respect of the Commission's final assessment. Whilst we do not intend to introduce any further appeals mechanism beyond our current process of considering and responding to representations we receive from EROs before publishing a final assessment of performance, we will continue to consult with a panel of representatives from the EAB in finalising all of our ERO assessments, including consideration of any representations received from EROs. Further information on this process can be found in chapter 3 – What happens next, below.

3 What happens next

3.1   Appendix A contains the new performance standards for EROs, which are unchanged from those published in the consultation paper. The new performance standards framework reflects what we and the UK Electoral Advisory Board agree that EROs need to do in planning for and delivering well-run electoral registration services.

3.2   This chapter sets out how the new framework will work. Whilst the standards focus on a well-run electoral registration service throughout the whole year, we have focussed on the electoral registration activity during the canvass period given that this is a key period of registration activity undertaken at a particular point in the year by all EROs. If we become aware of any issues relating to the performance of EROs outside this period, such as in the run-up to a poll, we will follow up with individual EROs where necessary. We also appreciate that the period outside of the canvass is a key opportunity to engage with EROs and inform their plans for future registration activity.

3.3   Now that the UK Government's proposed date for the referendum on the UK's membership of the European Union is known, we will review and update the approach to monitoring at the 2016 canvass as appropriate once this date is confirmed.

Monitoring ERO performance at the 2016 canvass

3.4   As proposed in the consultation paper, our approach to monitoring against the new standards will be based on our current risk-based approach, working with EROs highlighted through risk assessments to ensure that support can be provided where it is most needed.

3.5   EROs identified through this risk-based approach will be contacted in July and asked to submit a copy of their public engagement strategy and project planning documentation. The sample will be selected on the basis of risk, taking into account factors such as the experience of the ERO and any previous issues as well as any other available information. We will, however, keep the sample under review and should issues emerge we may seek to expand the monitoring to cover additional EROs and to use this to identify and fulfil any additional support needs.

3.6   We will continue to provide EROs with guidance, tools and templates to support them in planning for and delivering well-run electoral registration services. These will set out what we expect EROs will need to have in place, and what we would expect to see when reviewing the information, to be able to be satisfied that the key outcomes of the standards can be delivered. Our guidance, tools and templates to support EROs are available on our website

at www.electoralcommission.org.uk/i-am-a/electoral-administrator/running-electoral-registration. In addition, we will review this approach in line with any developments in the 'Academy' aspect of the Minister's vision.

3.7   We will review all of the information provided by EROs selected as part of the risk-based monitoring using criteria based on our guidance to ensure a consistent approach is taken in evaluating the strategies and plans. We will then provide support to EROs where we identify that it is required to ensure that they have in place effective public engagement strategies and project planning documentation appropriate for their local circumstances.

3.8   This support will principally be provided through staff in our teams in Northern Ireland, Scotland and Wales and across England. We will aim to provide any such support as soon as practicable to enable EROs, where necessary, to make any changes to their plans and processes as early as possible, and in any case will provide feedback on the information provided within five working days of the last date for submission.

3.9   We will then continue to monitor EROs selected as part of the risk-based monitoring in the delivery of their plans throughout the canvass period.

3.10 In addition to this, in October 2016, we will ask all EROs to provide an update on their progress with the delivery of the 2016 canvass and follow-up processes. This will be similar to the progress survey carried out in 2015 and will involve asking all EROs to complete a short survey, designed to help us to understand how the canvass is progressing in each area. Particularly, what work has already been completed, what the impact of this work has been and what remaining actions are still to be carried out. The results of this survey will also help to indicate if there are any emerging issues or performance concerns which would benefit from the provision of general or targeted guidance and support.

3.11 This also means that we will have an opportunity to identify any EROs who were not originally highlighted as requiring focussed support but where the available information highlights risks to delivery.

3.12 As in previous years, we will continue to focus our electoral integrity support and monitoring work in areas where there has been a history of allegations of electoral fraud and where the risk of further allegations arising is higher.

3.13 A panel of representatives from the EAB will then consider assessments, particularly in those cases where it appears that an ERO does not meet one or more elements of the standards. Following this, we will write to EROs setting out our assessment of their performance against the standards, as agreed with the panel of members of the EAB, giving each ERO an opportunity to comment. As is current practice, any representations received will be considered on a case-by-case basis and responded to before a final decision is made ahead of publication. As with previous years, we will then report on the performance of EROs following publication of the 1 December 2016 registers.

Data

3.14 All EROs will be required to provide the data as set out in the standards. Review of data will enable us to monitor progress with year-round registration activity and to identify where EROs may benefit from additional targeted support. The data will also help us to illustrate what progress is being made in response to the challenges already identified.

3.15 At present EROs are required to publish their revised registers on 1 December. Whilst this requirement continues as part of the electoral registration process, we will continue to collect data from EROs at this point. However, should there be large scale reform of electoral registration, as discussed above and in our recent report on the December 2015 registers, we would review how and when we collect data from EROs accordingly.

3.16 In addition to the main data collection that takes place after the publication of revised registers, we will also collect information from EROs relating to their performance through other means such as progress surveys as highlighted in para 3.10 and individual discussions carried out as part of our wider work to support EROs. We will continue to review and assess the timing, content and method of collecting information from EROs to ensure it remains appropriate.

Appendix A – Performance standards for Electoral Registration Officers

The following pages contain the final performance standards for EROs.

Performance standard 1: Framework for the delivery of registration activity		
Outcome	What does the ERO need to do to achieve the outcome?	What will demonstrate how the outcome has been met?
Clear understanding of the particular challenges in your registration area	• Identify and utilise data sources, as well as any other information you have, to highlight potential groups of electors who are less likely to be registered and develop a clear picture of the challenges in your area	• Public engagement strategy that includes: - a ward level data analysis of the area - priority areas identified by the ERO to target registration activity
Strategy for responding to the challenges in your registration area	• Identify suitable internal and external partners who you believe can assist with ensuring all eligible electors are encouraged to register to vote • Develop a strategy to respond to the challenges identified and incorporate into your registration plan	• Public engagement strategy that includes how the ERO will use the channels available to reach identified groups and existing electors. Including: - Direct contact routes - Local partners - Media and advertising

Robust project planning methodology employed to enable delivery of activity to maintain accurate and complete registers	• Evaluate and update your registration plan as appropriate to deliver your strategy
	• Review the resources available to you taking into consideration:
	  - the activities required and the ownership of these
	  - the timescales within which they need to be carried out
	  - opportunities in the electoral calendar to maximise registration
	• Ensure the training requirements of the different staff involved in delivery are met
	• Plan activities with the internal and external partners you have identified as being helpful to meeting the challenge in the area
	• Put monitoring and evaluation measures in place to ensure the maximum effectiveness of all activities
	• Develop and maintain processes to identify any patterns of activity that might indicate potential integrity problems, including what steps are to be taken to deal with any such problems
		• Overall project planning documentation, including a risk register, which is kept under regular review, and which includes:
		  - The objectives and success measures to be used to monitor the impact of activity
		  - The resource requirements of the activity you plan to carry out
		  - A timetable of deliverables and tasks for year round activity
		  - The partnership activity you have planned
		  - The evaluation measures you have in place for all activities carried out
		• Planning documents which clearly address potential integrity issues, how they would be identified and the actions to be taken in each case.

Performance standard 2: Delivery of registration activity to maintain accurate and complete registers		
Outcome	What does the ERO need to do to achieve the outcome?	What will demonstrate how the outcome has been met?

Effectively deliver your registration plan to ensure your register is as accurate and complete as possible	• Using information sources available identify existing electors who may no longer be eligible and ensure that all necessary steps are taken to remove that elector from the register
	• Using information sources available to you identify and target new electors, and ensure that all necessary steps are taken to add them to register including:
	  - putting measures in place to encourage applications to register from identified new electors
	• Ensure a full and effective canvass of properties is carried out including making personal visits by trained canvassers where voter registration material has not been responded to.
	• Utilise available direct contact methods to determine the accuracy of entries on the register and encourage applications from new electors
	• Maintain an audit trail to demonstrate the registration activity you have carried out
		• Data that demonstrates local challenges have been met including:
		  - Overall electorate figures
		  - Number of attainers
		  - Total number of electors deleted
		  - Number of electors added to the register
		  - Number of household enquiry forms issued and responded to and applications made as a result
		  - Number of reviews of registration undertaken and total number of electors deleted as a result
		  - Number of applications and registrations made through the exceptions
		  - Number of electors registered through attestation
		• Summary of activities carried out with partnership organisations and their impact.

Delivering a service in which residents and other stakeholders can have confidence	• Identify and investigate patterns of activity that might indicate potential risks to the integrity of the register and take appropriate steps to deal with any such problems. • Ensure there is provision of comprehensive, accessible information on how to register • Ensure there are clear response mechanisms in place for electors to use if assistance is required • Timely supply of the register to those entitled to receive it	• Details of how the approach to preventing and detecting electoral fraud is communicated to voters, candidates and other local contacts • Details of how feedback from electors is managed, including action taken and any changes to plans in response. • Date[s] supplied (including date[s] requested) for those entitled to receive the register on request

Appendix B – List of respondents

In addition to receiving feedback in discussions with a number of Electoral Registration Officers and electoral administrators, we received responses to our consultation from the following:

UK Government

- John Penrose MP, Minister for Constitutional Reform

Organisations

- Association of Electoral Administrators (AEA) – national response
- Scottish Assessors Association (SAA)
- Association of Electoral Administrators (AEA) – Eastern Branch
- Xpress Software Solutions Ltd.
- North West Regional Electoral Management Board

Electoral Registration Officers and local authorities

- Hyndburn Borough Council (Registration Officer)
- Flintshire County Council (Chief Executive)
- Ryedale (Electoral Services Manager)
- Hinckley & Bosworth Borough Council (Electoral Services Officer)
- Kettering Borough Council (Electoral Services Manager)
- Wokingham Borough Council (Service Manager, Electoral Services)
- Milton Keynes Council (Chief Executive)
- Camden Borough Council (Chief Executive)
- Kirklees Council (Chief Executive)
- Rugby Borough Council (Principal Electoral Services Officer)
- Salford City Council (Electoral Services Manager)
- Lancaster Council (Election Manager)
- Bournemouth Borough Council (Head of Electoral Services and Land Charges)

Individuals

- Toby James (Senior Lecturer in British and Comparative Politics)