



Performance standards for Electoral Registration Officers in Great Britain

First analysis of Electoral Registration
Officers' performance

April 2009

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 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.

This report represents the Commission's first assessment of EROs' performance against a series of standards published in July 2008. This is the first time that information about the performance of EROs has been collected, analysed and made available across Great Britain.

The performance standards framework

Ten performance standards were developed following extensive consultation with practitioners and stakeholders, drawing on a baseline data collection and analysis exercise conducted after the 2007 annual canvass of electors. The standards are grouped in four subject areas representing the most important areas that EROs should focus on to keep and maintain a complete and accurate electoral register. The first key subject area is supported by the standards in the final three subject areas:

- Completeness and accuracy of electoral registration records (Standards 1–3)
- Integrity of the registration process (Standards 4–5)
- Encouraging participation in the registration process (Standards 6–8)
- Planning and organisation (Standards 9–10)

EROs were asked to assess their own performance against each of the 10 standards, following the annual canvass which concluded in the publication of the register of electors by 1 December 2008. We received a return from all 404 EROs in Great Britain.

EROs assessed their performance against clear guidelines set by the Commission and were subject to a significant level of checking to ensure that the assessments were consistent and accurate. The process was broadly in line with other self-assessment frameworks used across the public sector.

Performance against the standards

Overall the first self-assessment against the standards paints a positive picture of performance by EROs across Great Britain, but it also points to areas where improvements need to be made.

- More than eight out of 10 (84%) EROs either meet or exceed all three of the standards relating to *Completeness and accuracy of electoral registration records*.
- No EROs failed to meet all of the three standards in this area.

The standards in the *Completeness and accuracy of electoral registration records* subject area reflect the main activities required to compile the electoral register, and performance against these standards provides a solid baseline to improve performance in the other areas. Focusing on these standards is now more important in view of the UK Government's intended move to individual electoral registration in Great Britain.

Performance across the other three subject areas is more varied, with a particular weakness apparent in standards which require evidence of a comprehensive formal written plan either to meet or exceed the standard. In particular, performance was weak against *Standard 3: House-to-house enquiries*, *Standard 4: Maintaining the integrity of registration and absent vote applications*, *Standard 6: Public awareness*, *Standard 9: Planning for rolling registration and the annual canvass* and *Standard 10: Training*.

Running an effective registration service is a major logistical project combining a variety of staff and contractual issues to meet demanding statutory timescales. Efficient planning and preparation is crucial to providing a successful registration process. Clearly documented plans that can be easily followed by staff involved in the electoral registration process can help officers plan these activities and meet their statutory duties

We have been encouraged both by the overall level of performance against the standards, and by the willingness of EROs and their teams to use the performance standards framework as a basis for continued improvement. This has by no means been a meaningless 'tick-box' exercise.

However, the exercise has highlighted areas where improvements are needed and we will issue specific guidance to EROs on what they need to do in order to meet the standards in 2009 and beyond, focusing specifically on work relating to integrity, participation and planning. We aim to have a plan to take this work forward by the end of April 2009 so that our guidance is in good time to be acted upon in the 2009 canvass. We look forward to working with EROs to support continued improvements in performance, and will use the findings of this analysis to identify opportunities to provide further support and assistance.

Information about the performance of individual EROs is also available on our website, where anyone can review performance against the standards in an accessible chart-based format. This tool also enables comparison of

performance with EROs for other local authorities, and in future will allow comparison with past performance. This information can be found on our website at www.electoralcommission.org.uk/performance-standards

1 Introduction

1.1 The Electoral Commission is an independent body set up by the UK Parliament under the Political Parties, Elections and Referendums Act 2000 (PPERA). Our aim is to ensure integrity and public confidence in the democratic process. Our corporate plan sets out our strategic direction over the five years from April 2009. The aims and objectives of the Commission are underpinned by two key priorities – demonstrating and enhancing our effectiveness as the regulator of party and election finance and leading the drive for increasingly high standards of electoral administration. Our four core objectives are:

- integrity and transparency of party and election finance
- complete and accurate electoral registers supported by a well-run electoral registration process
- well-run elections and referendums which produce results that are accepted
- fair boundary arrangements for elections in England

1.2 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 provide this high-quality service.

1.3 The 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.

1.4 The Electoral Administration Act 2006 (EAA) amended PERA¹ to give the Commission powers to set standards of performance for EROs, Returning Officers, and Referendum Counting Officers in Great Britain.² Under these provisions, the Commission may:

- determine and publish standards of performance for relevant electoral officers in Great Britain (EROs, Returning Officers and Referendum Counting Officers)
- direct relevant officers to provide the Commission with reports regarding their performance against the published standards
- publish its assessment of the level of performance by relevant officers against the published standards

¹ Sections 9A and 9B, Political Parties, Elections and Referendums Act 2000 (PPERA), as amended by Section 67, Electoral Administration Act 2006 (EAA).

² The performance standards provisions introduced by the EAA do not apply in Northern Ireland or local government elections in Scotland.

1.5 On 21 July 2008 the Commission published performance standards for EROs. The standards were developed after extensive consultation with government departments, specifically the Ministry of Justice, the Department of Communities and Local Government and its Lifting the Burdens Taskforce, the Welsh Assembly Government, local authorities, electoral administrators and other stakeholder organisations such as the Association of Electoral Administrators, the Scottish Assessors' Association and the Society of Local Authority Chief Executives. Between September and December 2007, the Commission also carried out a baseline survey of all EROs which provided an initial picture of performance and supported the development of the final standards.³

1.6 The 10 performance standards for EROs are grouped within four broad subject areas: *Completeness and accuracy of electoral registration records (Standards 1–3)*; *Integrity of the registration process (Standards 4–5)*; *Encouraging participation in the registration process (Standards 6–8)*; and *Planning and organisation (Standards 9–10)*. The standards are outlined in detail in Chapter 3.

1.7 We have been pleased with the positive and constructive way in which electoral administration professionals have engaged with the Commission during the development of these standards, and we are confident that the standards are supported and valued across the profession.

1.8 Prior to the development of this performance standards framework, information on the performance of EROs had not been collected or analysed consistently nationwide, and there was no mechanism available to assess the performance of EROs. By setting these standards, the Commission is now able to collect performance information from EROs in order to assess progress against the key objective of 'complete and accurate electoral registers supported by a well-run electoral registration process'.

1.9 This report provides our first analysis of EROs' performance against the standards. Information about performance across England, Scotland and Wales is provided in Chapter 3, and a more detailed analysis of the four subject areas can be found in Appendices A–D.

1.10 Information about the performance of individual EROs is also available on our website, where anyone can review performance against the standards in an accessible chart-based format. This tool also enables comparison of performance with officers for other local authorities, and in future will allow comparison with past performance. This information can be found on our website at www.electoralcommission.org.uk/performance-standards

³ *Baseline performance information – electoral registration in Great Britain (initial analysis)*
May 2008

Request for information from Electoral Registration Officers

1.11 On 29 October 2008 the Commission issued a circular directing EROs⁴ to make an assessment of their performance against the 10 performance standards, and provide supplementary quantitative data to provide context to the standards. The Commission also published guidance to assist the completion of these forms (*Part J – Managing electoral registration*). We also invited the officers to provide commentary or further information to support their self-assessment.

1.12 This is the first collection of self-assessments against the standards from EROs. The deadline for submission of the self-assessment forms was 16 January 2009, about seven weeks after the conclusion of the annual canvass and the publication of new electoral registers by 1 December 2008. We received performance assessments from all 404 EROs in Great Britain, ensuring that the analysis could be based on a complete set of information.

1.13 In addition to the self-assessment against the standards, we also asked EROs to complete an additional data collection sheet to provide contextual information. The data collected was similar to that collected in the baseline survey carried out after the 2007 annual canvass. A full analysis of this information in comparison to that collected last year is explained in more detail in Chapter 4.

1.14 During the development of our performance standards framework, some practitioners and other bodies raised concerns about the additional burden that the standards assessment and data collection would have on EROs and their staff. Having concluded this first exercise, we are confident that the exercise did not represent a significant or undue administrative burden, although we recognise that our performance framework is likely to involve some time and effort on the part of EROs. Officers who already had the necessary plans and procedures in place said that they had less difficulty assembling the evidence.

1.15 We have been encouraged by the willingness of EROs and their teams to use the performance standards framework as a basis for continued improvement. This has by no means been a meaningless 'tick-box' exercise.

Verification of self-assessments

1.16 Having received performance assessments from EROs, we undertook a sample-based verification exercise to ensure that the self-assessment forms had been completed accurately and consistently across Great Britain. The self-assessment and sample verification approach is one which has been used in other public sector performance frameworks, including the Audit Commission's Comprehensive Performance Assessment and new

⁴ EC24/2008, Direction to Report under Section 9B (1) PPERA 2000 – Performance Standards for EROs in GB.

Comprehensive Area Assessment frameworks for local government in England. During the verification process we examined the evidence which supported an ERO's self-assessment and judged it against the criteria in our guidance.

1.17 During our verification process, we looked at evidence from 35% (143) of all EROs across Great Britain. The process involved a meeting with the Electoral Services Manager, discussing the assessment against the standards and looking at the relevant evidence used to justify the self-assessment. In a small number of cases, Commission representatives asked EROs to reconsider their assessments, on the grounds that they did not appear to meet the criteria suggested in our guidance. These cases included instances of assessments that appeared to be either too high or too low. In total, 33 EROs resubmitted their assessments.

1.18 Carrying out the verification process in this way has served three distinct purposes. Firstly, as this was the first time that the Commission had requested self-assessments against the standards, we were able to ensure that EROs completed the forms consistently. Secondly, we were able to check whether the guidance we provided was sufficient for officers to complete their assessments. Finally, we have started to identify evidence and documentation that might provide the basis for 'good practice' advice, which can be shared with other EROs.

Using this performance information

1.19 The information that we have collected will be analysed to identify where performance could be improved, and to help support EROs. In order to effectively use the information that we have collected, we intend to undertake more detailed follow-up analysis on specific issues as we continue the development of our performance standards framework.

1.20 In addition to this, the proposed introduction of individual electoral registration in Great Britain will provide more challenges for EROs. We will review the performance standards again once the practical and legal framework for collecting personal identifiers has become clearer later in 2009.

1.21 The 10 performance standards for EROs are divided into four distinct subject areas, which should be considered alongside one another to provide a full picture of performance. The first subject area, consisting of three standards, looks at the *Completeness and accuracy of electoral registration records*, including the sources of information used by EROs and their annual canvass plans. The other three areas, important in their own right, support the functioning of a complete and accurate register.

1.22 During the development of these standards, we decided against developing a single composite measure of performance (similar to the 'star' ratings used in other frameworks), to maintain transparency and simplicity, and avoid the use of complicated formulae. Aggregating the total number of standards not met, met, or exceeded across all 10 standards may not give an

accurate picture of performance. The analysis in Chapters 2 and 3 shows that performance varies across all four subject areas for a number of reasons.

2 Performance against the standards

2.1 The performance standards are grouped in four subject areas representing the most important areas that Electoral Registration Officers (EROs) should focus on to keep and maintain a complete and accurate electoral register. The first key subject area (*Completeness and accuracy of electoral registration records*) is supported by the standards in the other three subject areas, listed in Table 1 below.

Table 1: Performance standards for Electoral Registration Officers in Great Britain

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

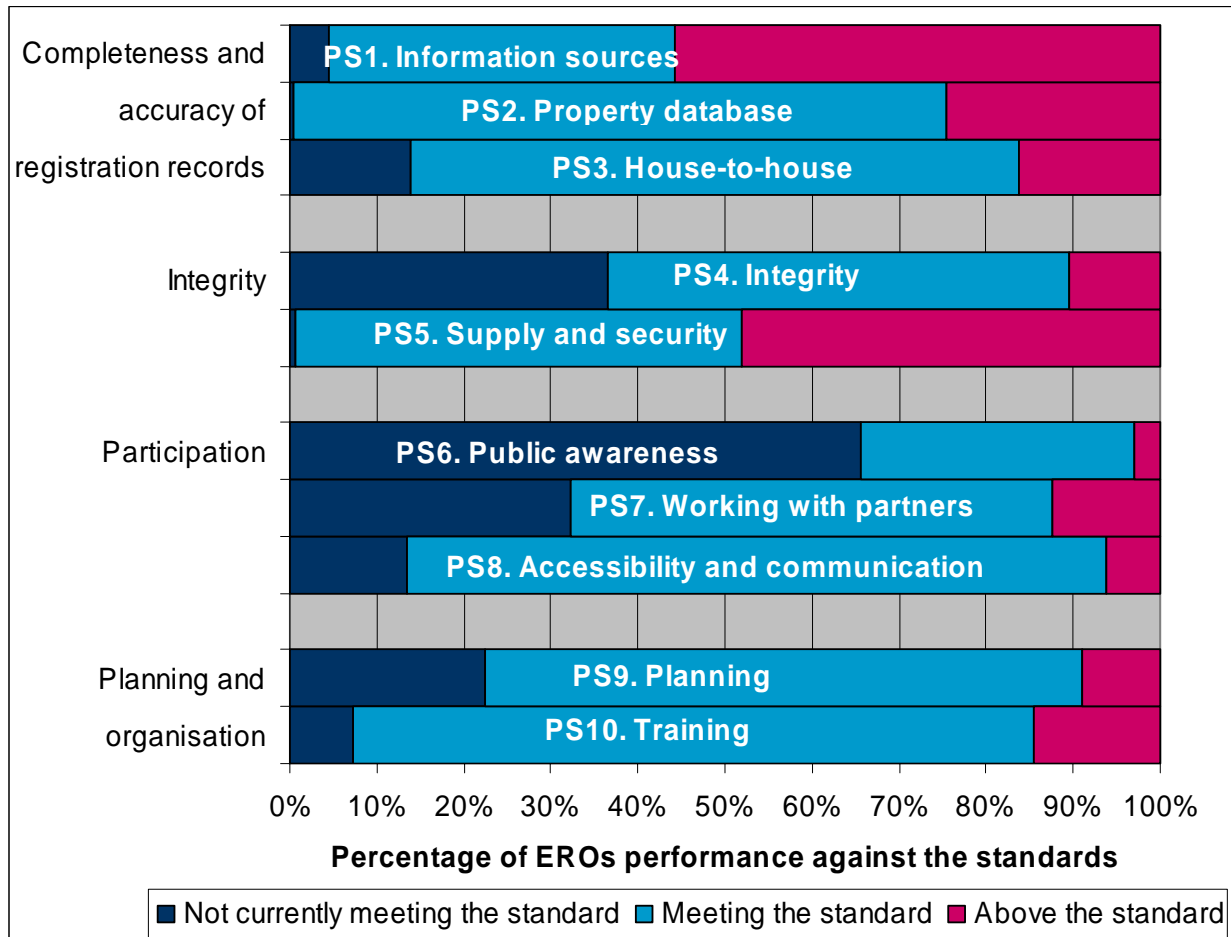
2.2 EROs were asked to assess themselves against each of the 10 standards according to three different categories: 'Not currently meeting the standard', 'Performance standard', and 'Above the performance standard'. The assessments were made in accordance with the guidance supplied by the Commission, which outlined the level of performance we would expect in order to satisfy the particular criteria at each level.

2.3 For some of the standards there are two levels of performance in the 'Not currently meeting the standard' section, and in one case, two levels of performance in the 'Above the standard' section. Within the 'Not currently meeting the standard' section, the lower level indicates that the officer does not carry out any activities towards meeting the standard, while the second level indicates that some of the activities we would expect are being carried out, but not sufficiently to meet the standard. For the purpose of the analysis which follows, we have used only the three categories of performance ('Not currently meeting the standard', 'Performance standard', and 'Above the performance standard'), and have not illustrated findings relating to the levels within each category.

Summary of performance across Great Britain

2.4 The overall performance of EROs in Great Britain is illustrated in Chart 1 below, which shows the proportion of officers who meet each standard. The key findings and analysis are outlined in more detail in this section.

Chart 1: Performance of EROs in Great Britain



2.5 Our analysis of the performance standards returns has identified two important findings:

- The majority of EROs use appropriate available information to ensure their electoral registers are as complete and accurate as possible.
- However, many EROs lack formal planning and management documentation, specifically in relation to public awareness, integrity of registration, and planning for the rolling registration process and the annual canvass.

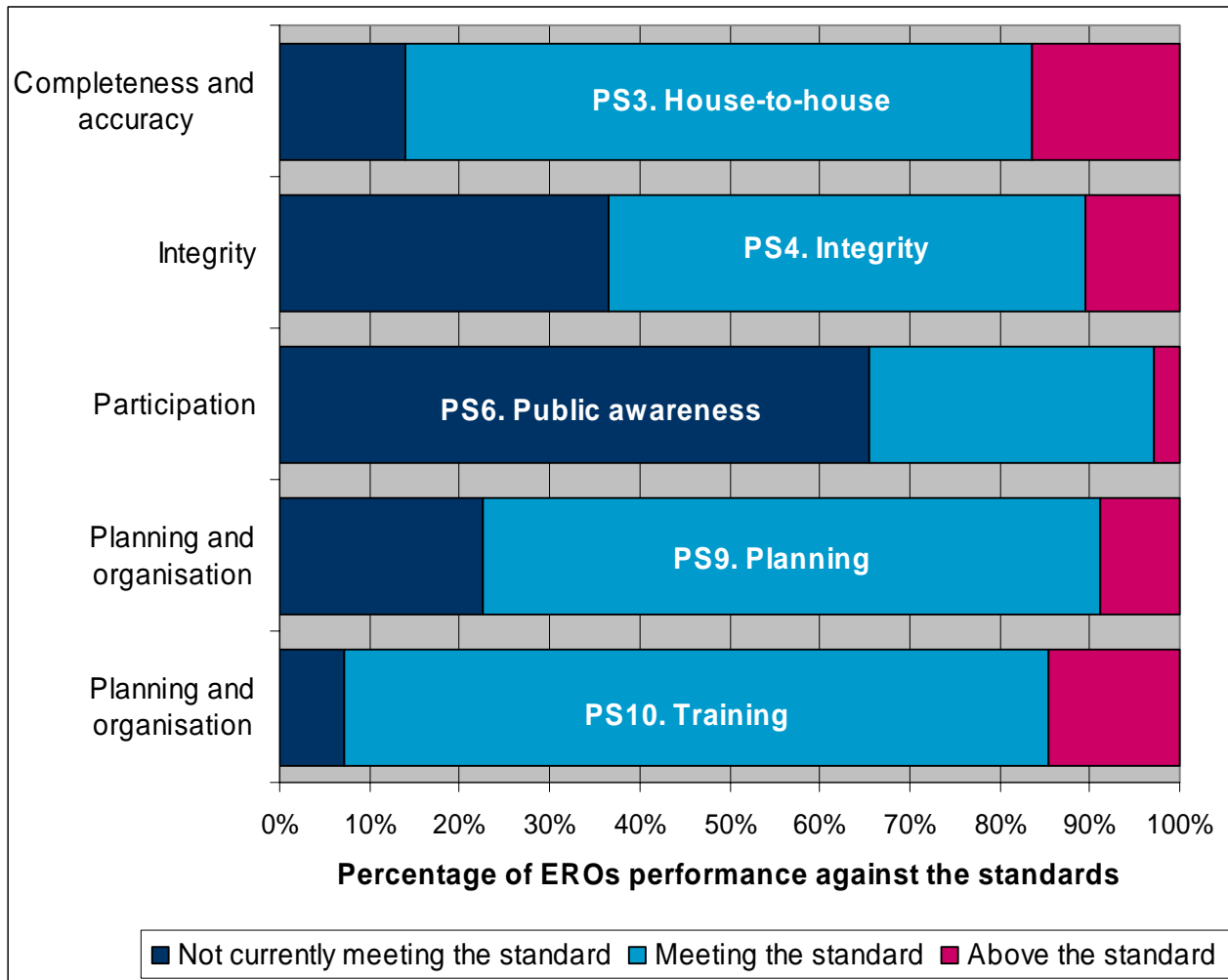
2.6 More than eight out of 10 (84%) EROs in Great Britain meet or exceed all three of the standards in the first subject area relating to completeness and accuracy of electoral registration records (*Information sources, Property database, House-to-house*). No ERO failed to meet any of the three standards in this area.

2.7 However, performance across the other three subject areas is more varied, with a particular weakness showing in *Standard 4: Maintaining the integrity of registration and absent vote applications* and *Standard 6: Public awareness*. A common theme emerging from our analysis of performance against the standards is the absence of formal written plans for many key electoral registration activities. Our guidance suggests that a comprehensive written plan, for the purposes of meeting the standards, should contain:

- clearly defined objectives and success measures
- risks – identification and mitigation
- plans for recruitment of temporary/permanent staff where needed
- financial resources
- an evaluation plan recording the results of the activities undertaken

2.8 Chart 2 shows the performance of EROs across Great Britain against the standards that require a formal written plan to be in place in order to be assessed as 'Meeting the standard'. It is clear that this is an area in which improvement is needed: two-thirds of EROs (66%) have not developed plans or strategies for improving public awareness of electoral registration, and nearly four out of 10 (37%) do not have formal plans in place for dealing with concerns about possible fraudulent registration or absent vote applications.

Chart 2: Performance of EROs in Great Britain against the standards which require a written plan



2.9 The most common explanations given by EROs who have not developed formal plans in these areas are that they did not have sufficient time or resources to draft such a plan, or that a written plan was not necessary given the small size of their teams. In some cases, although plans have been drafted, they did not meet all the criteria we had identified in our guidance. A number of EROs said that whilst they do not have a single planning document, written plans are contained in a number of different documents.

2.10 Running an effective registration service is a major logistical project involving both permanent and temporary staff, outsourcing and contract management, and is one that must be delivered to statutory requirements and timescales. Effective planning and preparation is key to providing a successful registration process and minimising the risk of incomplete or inaccurate electoral registers. Clearly documented plans that can be easily followed by all staff involved in the electoral registration process can help EROs plan the activities required to meet their statutory duties.

2.11 Although we recognise that some electoral services teams are very small in terms of the number of staff employed, 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. We plan to work with EROs who do not currently meet these standards by offering support and producing planning templates in these areas.

Completeness and accuracy of electoral registration records

2.12 This subject area includes the first three performance standards which cover the practices used by EROs to ensure that registers are complete and accurate using a variety of information sources and canvassing techniques. Performance against each of these three standards was strong:

- A total of 96% of EROs said that they met or exceeded *Standard 1: Using information sources to verify entries on the register of electors and identify potential new electors*, and more than half say that they exceed the standard.
- Only two EROs said they were below *Standard 2: Maintaining the property database*, meaning that over 99% of EROs met or exceeded this standard.
- A total of 86% of EROs said they met or exceeded *Standard 3: House-to-house enquiries*.

2.13 Maintaining the completeness and accuracy of electoral registration records is one of the core responsibilities of EROs. It is, therefore, encouraging that the majority (84%) of EROs across Great Britain either say they meet or perform above all three standards in this subject area. No ERO failed to meet any of the three standards in this area, and our verification checks did not suggest otherwise.

2.14 Our analysis of the returns for these standards 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 using the Local Land and Property Gazetteer (LLPG) to maintain the property database for *Standard 2*. 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 not able to reach 'Above the standard'.

2.15 A higher proportion of EROs reported that they did not meet *Standard 3: House-to-house* than the other two standards in this subject area. 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 written plan in place. Our verification of returns across Great Britain echoed these comments and found that evidence of comprehensive

written plans was lacking or only included a canvass activity timetable or task list. This appears to be a relatively isolated weakness: of the 44 EROs who reported that they were below *Standard 3*, only nine have also assessed themselves below *Standard 1*, and none were below *Standard 2*.

2.16 As outlined earlier, weaknesses in formal planning and management documentation is a theme mirrored in other standards that require a written plan. It is encouraging that in many cases the basic components of formal plans appear to be available, and these now need to be consolidated and used more effectively to minimise risks for future annual canvass activities. This is an area where the Commission will offer further support and guidance.

2.17 Feedback also suggests 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. 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 electoral register.

2.18 Although we recognise that EROs should use their own judgement in deciding whether house-to-house enquiries are needed, they 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.

Integrity

2.19 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. There was a notable contrast in performance against these two standards:

- More than a third of EROs (37%) said they did not currently meet *Standard 4: Maintaining the integrity of registration and absent vote applications*.
- Only three EROs said they were below *Standard 5: Security and supply of the electoral register*, meaning that over 99% of officers met or exceeded this standard.

2.20 In common with performance against the other standards which require evidence of formal planning or management documentation, many of the EROs who did not meet *Standard 4* said that while they have informal plans in place, they are not necessarily documented, and therefore do not meet the criteria specified in our guidance. 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. We would expect all EROs to document a plan to check the integrity of registration and absent vote applications.

2.21 Most EROs reported that they have contact with their police service single point of contact (SPOC) and that they keep registration forms for the life of the register and absent vote applications until the application is cancelled. However, they fail to meet the standard because of the absence of a comprehensive formal plan. We found some evidence to suggest that EROs who had experienced electoral fraud were more likely to have a formal strategy, than those who had not.

2.22 Almost half of all EROs in Great Britain (48%) reported that they exceeded *Standard 5: Supply and security*. Many of these officers reported that they had a complaints process in place, either within the team or most commonly from the council. The EROs who said that they did not meet the standard reported that they did not specifically provide training and guidance to those supervising access to the electoral register.

Participation

2.23 The third subject area includes three standards which cover the processes used by EROs to encourage participation in the registration process. Again, there were some variations in performance against the three standards:

- Only a third of EROs (34%) said they either met or exceeded *Standard 6: Public awareness strategy*.
- Two-thirds of EROs (67%) said they either met or exceeded *Standard 7: Working with partners*.
- A total of 85% of EROs said they either met or exceeded *Standard 8: Accessibility and communication of information*.

2.24 Over two-thirds of EROs across Great Britain said that they are not currently meeting *Standard 6: Public awareness*, the highest percentage below the standard of all 10 standards. This standard requires evidence of the development of a comprehensive strategy and plan for improving participation in electoral registration, and again the absence of formal written documentation meant that a significant majority of officers failed to meet this standard.

2.25 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'. With greater demands now being placed on officers to promote participation and a wide range of activities and media by which to do so, officers are expected to document how they intend to carry out these activities. For public awareness activities and participation issues in general, there is substantial help available

through the Commission's Do Politics website. The information includes press release forms, planning templates and other resources which would help EROs to meet *Standard 6*. These resources are free to download at www.dopolitics.org.uk.

2.26 Analysis of the free text boxes accompanying each standard suggests that while some public awareness activities are undertaken, they are often ad-hoc activities which are not evaluated. Feedback from comments submitted alongside these assessments, together with evidence from our verification interviews, suggests that many authorities expect to use these standards as a basis for developing formal plans in advance of the 2009 annual canvass.

2.27 More EROs said that they meet *Standards 7 and 8 (Working with partners and Accessibility and communication respectively)*, but relatively few report that they exceed these standards. Forty-five per cent of officers who say that they do not have a public awareness strategy (and therefore do not meet *Standard 6*) also say that they do not currently meet *Standard 7*. A third of these also say that they do not meet *Standard 8*. Just over 10% (43 officers) did not meet all three of the standards in this area.

2.28 The narrative feedback that we received for *Standard 7* varies considerably, showing that there is some joint working between authorities, and various other departments, most commonly in relation to advertising and for council tax records (*Standard 1: Information Sources*).

2.29 Ten per cent of officers say that they are 'Not currently meeting' *Standard 8*. Our verification visits have shown that there are a number of reasons for not providing information in different formats (mostly due to council policy or demographics of the local area).

Planning and organisation

2.30 The final subject area includes two standards which cover the planning and organisation functions of EROs. The standards both required evidence of formally documented plans to meet the standard. Performance was generally strong, although, in keeping with other standards that required written documentation, there remain areas for improvement:

- Three-quarters of EROs said they either meet or exceeded *Standard 9: Planning for rolling registration and the annual canvass*.
- Nearly 93% of EROs said they either meet or exceeded *Standard 10: Training*.

2.31 Many of those EROs who reported that they do not currently meet *Standard 9: Planning* said that they do not have a comprehensive written plan. Although this is broadly consistent with the other standards requiring a written plan, it appears that EROs are more likely to have formally documented a plan for the annual canvass and rolling registration process than plans for other areas, in particular *Integrity* and *Public awareness*. Those EROs who reported that they did not meet performance standard said that they did not provide a

plan for rolling registration throughout the year as well as for the annual canvass.

2.32 A very small percentage of EROs (five) reported that they do not provide training for their staff other than the basic induction process. Our analysis of the narrative comments provided by EROs and face-to-face visits with electoral service teams suggests that the primary reason for an assessment below the standard is the lack of a written schedule of training activities, rather than the lack of training itself. Almost all EROs offer some form of basic training to their staff, although the content and depth of the training is in some cases dependent on budget.

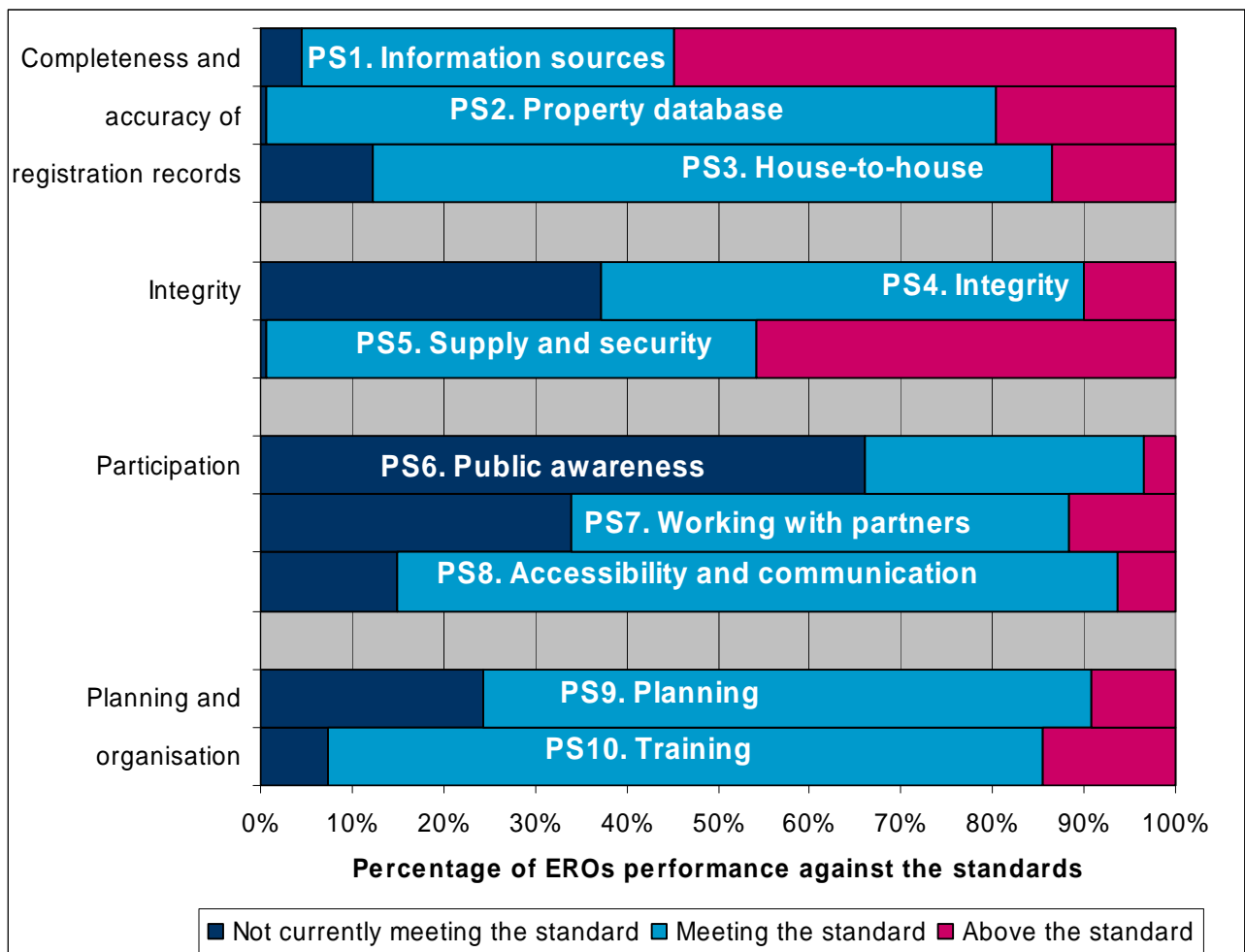
3 Performance in England, Scotland and Wales

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

England

3.2 Performance against the standards by the 350 EROs in England is shown in Chart 3, below. The results for England are broadly similar to performance across Great Britain as a whole, which would be expected given the larger number of EROs in England compared to Scotland (32) and Wales (22). We have, therefore, not provided a comparison of performance between EROs in England and Great Britain as a whole.

Chart 3: Performance of EROs in England



3.3 There are some variations in performance by EROs in England between the 10 standards:

- Only two EROs (0.6%) in England said that they did not currently meet *Standard 2: Property database* and three EROs did not meet *Standard 5: Supply and security*. More than 95% of officers in England reported that they either met or exceeded *Standard 1: Information sources*.
- However, two-thirds of EROs in England said that they did not meet *Standard 6: Public awareness strategy* and only 12 officers reported that they exceeded the standard.

3.4 Local authorities in England are classified according to a number of different authority types (unlike in Scotland and Wales where all councils are the same type), including metropolitan districts, unitary authorities, London boroughs and district councils. There are some variations in the performance of EROs in different types of authorities in England. In particular, it appears that EROs for London boroughs and metropolitan districts are more likely to meet the performance standards than officers in other types of authorities. These variations and other relevant findings are outlined in more detail below. Although it may be possible to speculate about the reasons for any trends or variations in performance, we have not done so here. Nevertheless, during the coming year, we will ensure that we learn from EROs in both higher and lower performing authorities and understand what underpins their levels of performance.

Completeness and accuracy of electoral registration records

3.5 Performance by EROs in England is generally strong in relation to the first three standards, which make up the first key subject area of *Completeness and accuracy of electoral registration records*, and there is broad consistency in the proportion of EROs, from different types of authorities, who met the standards. Unitary authorities and London boroughs are slightly more likely to meet *Standard 3: House-to-house*, with only 6% and 9% of officers respectively reporting that they did not currently meet the standard, compared with 13% of EROs from district councils and almost 17% of EROs from metropolitan districts.

3.6 There are also variations in the proportion of officers from different types of authorities reporting that they exceed some of the standards. A third of EROs in metropolitan districts reported that they exceeded *Standard 2: Property database*, while only 15% of officers from district councils did so. While 14% of EROs across Great Britain reported that they exceeded *Standard 3*, a quarter of officers from metropolitan districts and a third of officers from London boroughs said that they did so.

3.7 *Standard 3* is one of four which requires evidence of formally documented plans in order to meet or exceed the standard. Many EROs who fell below the standard said that while they carry out the annual canvass in compliance with the legislation and guidelines, there is no comprehensive written plan in place. Feedback also suggests that although such plans may

be in place, some officers take the view that a comprehensive house-to-house canvass is not always feasible in some areas.

Integrity

3.8 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*. Officers from metropolitan districts and London boroughs were less likely to report that they did not meet the standard (17% and 27% of officers respectively) compared with 38% of officers across Great Britain as a whole. EROs from district councils were more likely to be below *Standard 4*, with 42% reporting that they did not currently meet the standard.

Participation

3.9 While 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, some broad patterns also emerged.

3.10 Compared with the performance of EROs across Great Britain as a whole, officers from district councils in England were more likely to be below in *Standards 6, 7 and 8: Public awareness, Working with partners and Accessibility and communication* respectively, while officers from London boroughs and metropolitan districts were less likely to report that they did not meet the standards. The performance of officers from unitary authorities was consistent with that of officers across Great Britain as a whole.

3.11 EROs in London boroughs appear to have performed particularly strongly in relation to *Standards 6, 7 and 8*. They were less likely than officers across Great Britain as a whole to report that they did not meet the standards (45% compared with 66% for *Standard 6*, 15% compared with 32% for *Standard 7*, and 6% compared with 13% for *Standard 8*). They were also more likely to have exceeded the standards than officers across Great Britain as a whole (15% compared with 3% for *Standard 6*, 24% compared with 12% for *Standard 7*, and 21% compared with 6% for *Standard 8*).

Planning and organisation

3.12 Performance was more consistent across the two standards in *Planning and organisation* and again some broad themes emerged. Overall, the performance of EROs in England was strong against *Standard 9: Planning* and *Standard 10: Training*. Three-quarters of officers met or exceeded *Standard 9*, which was similar to the proportion in Great Britain, while 92% met or exceeded *Standard 10*.

3.13 Compared to the performance of EROs across Great Britain, officers from district councils were more likely to be below both standards while officers from metropolitan authorities were less likely to say that they did not meet the standards.

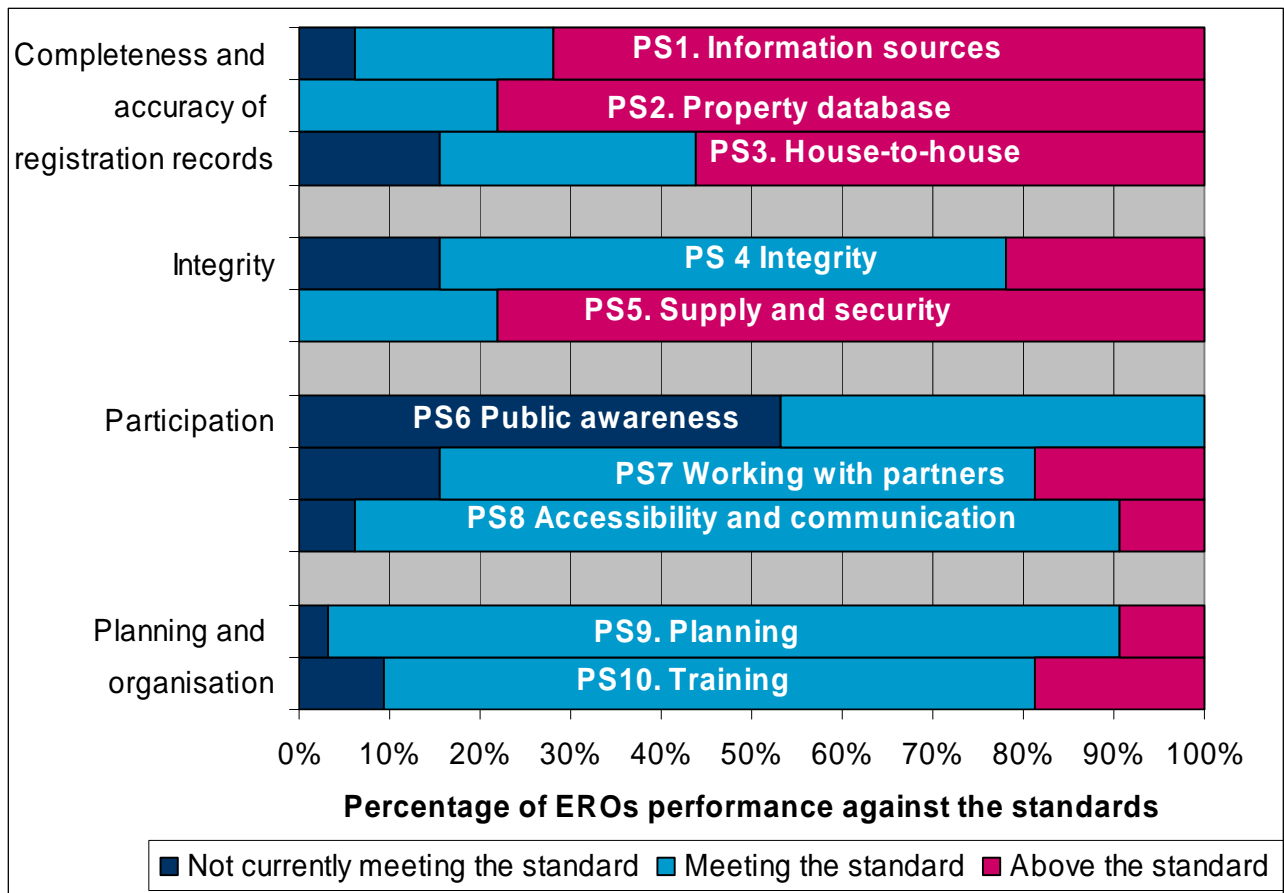
3.14 EROs in London boroughs appear to have performed particularly strongly in relation to both standards. They were less likely than officers across Great Britain as a whole to report that they did not meet the standards (21% compared with 24% for *Standard 9*, and 6% compared with 8% for *Standard 10*). They were also more likely to have exceeded the standards than officers across Great Britain as a whole (18% compared with 9% for *Standard 9*, and 36% compared with 14% for *Standard 10*). There were no officers from metropolitan authorities who said that they did not meet *Standard 10*.

Scotland

3.15 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. 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.

3.16 As the same practices and procedures are used in every area where the ERO is appointed by a combination of councils, a self-assessment return was made for each ERO rather than for each council area, meaning that we received 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



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

- The EROs for all 32 Scottish councils met or exceeded two of the 10 standards: *Standard 2: Property database* and *Standard 5: Supply and Security*.
- However, the EROs for more than half of the Scottish councils (17 out of 32) reported that they did not meet *Standard 6: Public awareness* and none reported that they exceeded the standard.

3.18 As a whole, EROs for Scottish councils performed strongly when compared with the performance of EROs across Great Britain: a higher proportion of officers for Scottish councils met or exceeded the standard in relation to eight out of the 10 performance standards.

Completeness and accuracy of electoral registration records

3.19 EROs for Scottish councils performed strongly in relation to the three standards which concern the *Completeness and accuracy of registration records* (*Standards 1–3*).

3.20 Only one ERO, appointed by two Scottish councils, reported that they did not currently meet *Standard 1: Information sources*. EROs for 23 of the 32 Scottish councils (72%) reported that they exceeded *Standard 1*.

3.21 EROs for all 32 Scottish councils reported that they met or exceeded *Standard 2: Property database* and EROs for 25 authorities (78%) said that they exceeded the standard. In the majority of cases, the persons appointed as EROs in Scotland are also the Assessors.⁵ The Assessor is responsible for the valuation of domestic and non-domestic properties for the purposes of council tax and non-domestic rates. Therefore, 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.

3.22 EROs for more than half of all Scottish councils (18 out of 32) reported that they exceeded *Standard 3*. However, officers appointed by five Scottish councils assessed themselves as not currently meeting the standard for *Standard 3*. Several EROs said that they target their enquiries at those areas with the lowest returns in order to make best use of their resources.

Integrity

3.23 Although EROs for five Scottish councils (16%) reported that they did not currently meet *Standard 4: Integrity*, performance in Scotland compares favourably with that of officers across Great Britain as a whole. Feedback suggests that while all officers have some checks and procedures in place to detect suspicious registration and absent vote applications, the absence of a written plan was the main reason why some assessed themselves as below standard. EROs for seven Scottish councils (22%) reported that they exceeded *Standard 4*.

3.24 EROs for all 32 Scottish councils reported that they either met or exceeded *Standards 5: Supply and security*, and EROs for 25 councils (78%) said that that they exceeded the standard.

Participation

3.25 EROs for just over half of all Scottish councils (17 out of 32) said they did not currently meet *Standard 6: Public awareness* and no EROs said that they performed above the standard. Although performance in Scotland compares relatively favourably with that of EROs across Great Britain as a whole, improvements are clearly needed in this area. While all EROs in Scotland said that they carry out a variety of public awareness activities, these are often not planned, documented or evaluated. A number of responses cited a lack of resources (both staffing and financial) as the reason they could only undertake low- or no-cost activity. As we have noted in paragraph 2.25, EROs have a duty to promote participation, and the Commission has provided

⁵ Dundee City Council has appointed one of its own officers to act as the ERO separate from the Assessor.

extensive guidance for this on the Do Politics website. We would, therefore, expect all officers to have a plan in place for their public awareness activities.

3.26 EROs for only five Scottish councils (16%) reported that they did not meet *Standard 7: Working with partners*. EROs for 19% of Scottish councils reported that they exceeded *Standard 7*. Building relationships with officers of the relevant councils was reported to be a particular difficulty for some EROs who do not work directly for the council but under a valuation joint board.

3.27 A majority of EROs (appointed by 27 out of 32 Scottish councils) reported that they met *Standard 8: Accessibility and communication*, with only one return from the ERO for two Scottish councils not currently meeting the standard, and one return from the ERO for three Scottish councils exceeding the standard. Where EROs said that they had been able to evaluate the use of different languages and formats, they also said the demand for this service was extremely low. Consequently, most EROs have a process in place to access a telephone interpretation service, or translations of forms from the Commission, to assist electors.

Planning and organisation

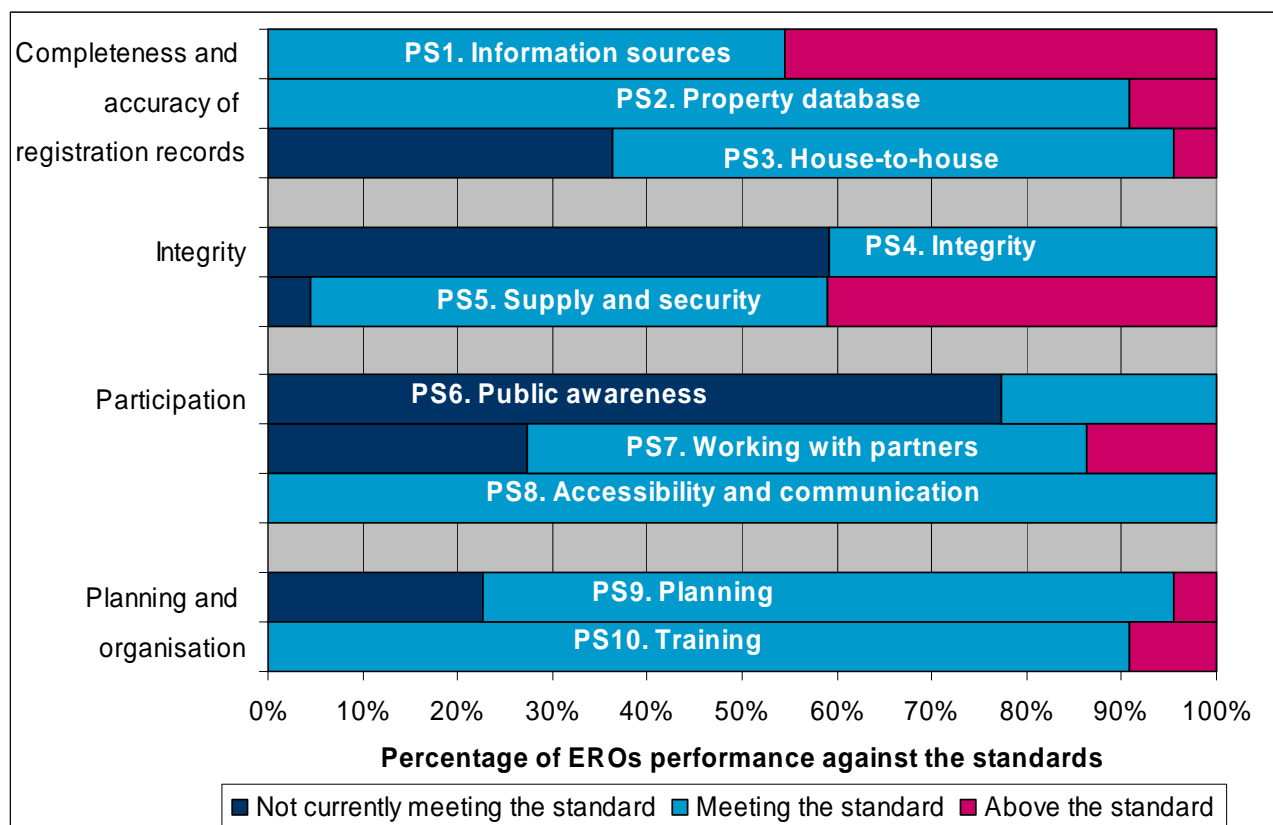
3.28 Performance by EROs for Scottish councils against *Standard 9: Planning* was considerably better than that of officers across Great Britain as a whole. The vast majority of EROs in Scotland (88%) met the standard for planning for rolling registration and the annual canvass, and one ERO (appointed by three Scottish councils) reported that they exceeded the standard. Feedback indicates that almost all officers had written plans and procedures in place, although this did not always include the objectives and strategies for targeting hard-to-reach groups.

3.29 Performance by EROs for Scottish councils against *Standard 10: Training* was generally consistent with performance across Great Britain as a whole. All but one ERO, who was appointed by three Scottish councils, either met or exceeded the performance standard. EROs for six Scottish councils (19%) exceeded *Standard 10*.

Wales

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

Chart 5: Performance of EROs in Wales



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

- All 22 EROs in Wales met or exceeded four of the standards (*Standard 1: Information; Standard 2: Property database; Standard 8: Accessibility and communication; and Standard 10: Training*).
- However, just under two-thirds of the 22 EROs in Wales met or exceeded *Standard 3: House-to-house enquiries*, while only nine met *Standard 4: Integrity*, and five met or exceeded *Standard 6: Public awareness*.

Completeness and accuracy of electoral registration records

3.32 All EROs in Wales met or exceeded *Standard 1: Information Sources* and *Standard 2: Property database*, which is slightly better than the performance of EROs across Great Britain as a whole. In Wales, *Standard 1* had the highest proportion of officers rating themselves as exceeding the standard compared with the other nine standards. A smaller proportion of

EROs in Wales reported that they exceed *Standards 1 and 2* (9% and 45% respectively).

3.33 Sixty-four per cent of EROs (14 out of 22) met or exceeded *Standard 3: House-to-house* in Wales. During our verification exercise, EROs who said that they did not currently meet the standard suggested that house-to-house enquiries are often not conducted due to impracticality in rural areas and security issues on some estates.

Integrity

3.34 Performance by EROs in Wales against the two standards covering electoral integrity was generally weaker than performance across Great Britain as a whole. Thirteen of the 22 EROs in Wales (59%) reported that they did not currently meet *Standard 4: Integrity* – the second highest proportion after *Standard 6: Public awareness strategy*. No officers reported exceeding *Standard 4*. A number of EROs in Wales cited the fact that they did not have formal documented plans in place as the reason for rating themselves below the standard, despite fulfilling most of the other criteria for the standard.

3.35 Only one of the 22 EROs in Wales reported that they did not meet *Standard 5: Supply and security*, while 12 officers met the standard and nine exceeded the standard. The one officer who said they did not currently meet the standard acknowledged that they did not currently provide staff training on the supply and security of the register.

Participation

3.36 Performance against the standards relating to participation varied significantly among EROs in Wales, reflecting the variation in performance across Great Britain as a whole. A higher proportion of EROs in Wales reported that they did not currently meet *Standard 6: Public awareness* (17 of the 22 officers, representing 77%) than any of the other nine standards. No officers reported exceeding *Standard 6*. Again, feedback appears to suggest that failure to meet this standard reflected the absence of formally documented public awareness plans.

3.37 Nearly three-quarters of EROs in Wales (16 out of 22) reported that they met or exceeded *Standard 7: Working with partners*, including three officers who exceeded the standard.

3.38 All 22 EROs in Wales reported that they met *Standard 8: Accessibility and communication* of electoral registration information. Feedback from officers suggests that Wales has less need for a large variety of publications in different languages than England and Scotland, because there is not the same demand for the service. All documents are produced in English and Welsh.

Planning and organisation

3.39 Performance by EROs in Wales against the final two standards broadly mirrored the picture of performance across Great Britain as a whole. More than three-quarters of EROs (17 out of 22 officers) reported that they met or exceeded *Standard 9: Planning*. Feedback from officers who assessed themselves below standard suggests that while many have the plans in place, they were not confident that they satisfied the criteria for a comprehensive written plan as specified in our guidance.

3.40 All 22 EROs in Wales reported that they met or exceeded *Standard 10: Training*, including two who exceeded the standard. All EROs offer some form of basic training to their staff. However, the content and depth of the training is in some cases dependent on budget.

4 Annual canvass and electoral registration data

4.1 In addition to the self-assessments against the performance standards, we asked EROs across Great Britain to provide performance data in relation to a number of electoral registration activities, including:

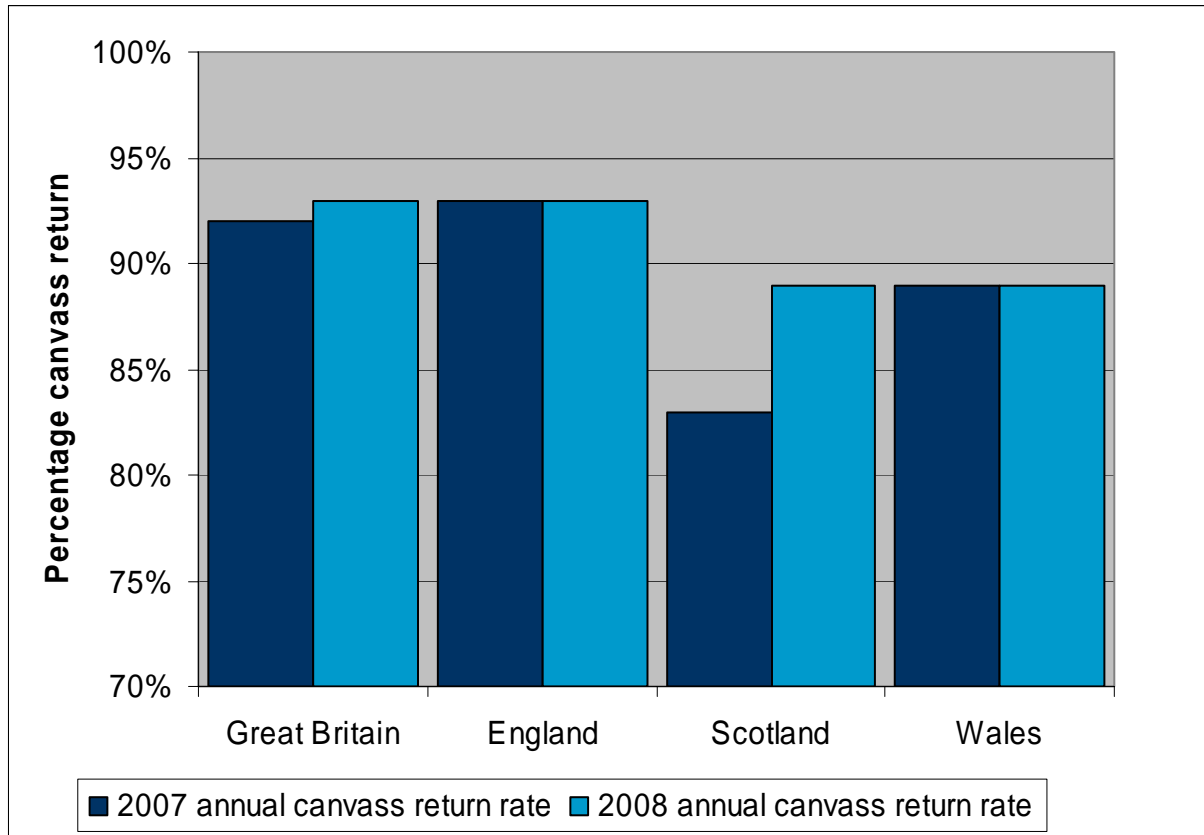
- success of the annual canvass – the proportion of households responding to the autumn 2008 annual canvass of electors
- carry forward of elector records – the proportion of electoral records carried forward by EROs after two consecutive years of non-response to the annual canvass

4.2 Overall we received 387 returns, representing a response rate of 96%. We have also used data published by the Office for National Statistics to analyse changes in the overall number of registered electors in Great Britain and this section deals with our analysis of that data.

Success of the annual canvass

4.3 This measure examines the extent of householder participation in the annual canvass. It 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. Chart 6 below shows the average canvass return rate for EROs from Great Britain (England, Scotland and Wales) as a percentage of the canvass forms sent out.

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

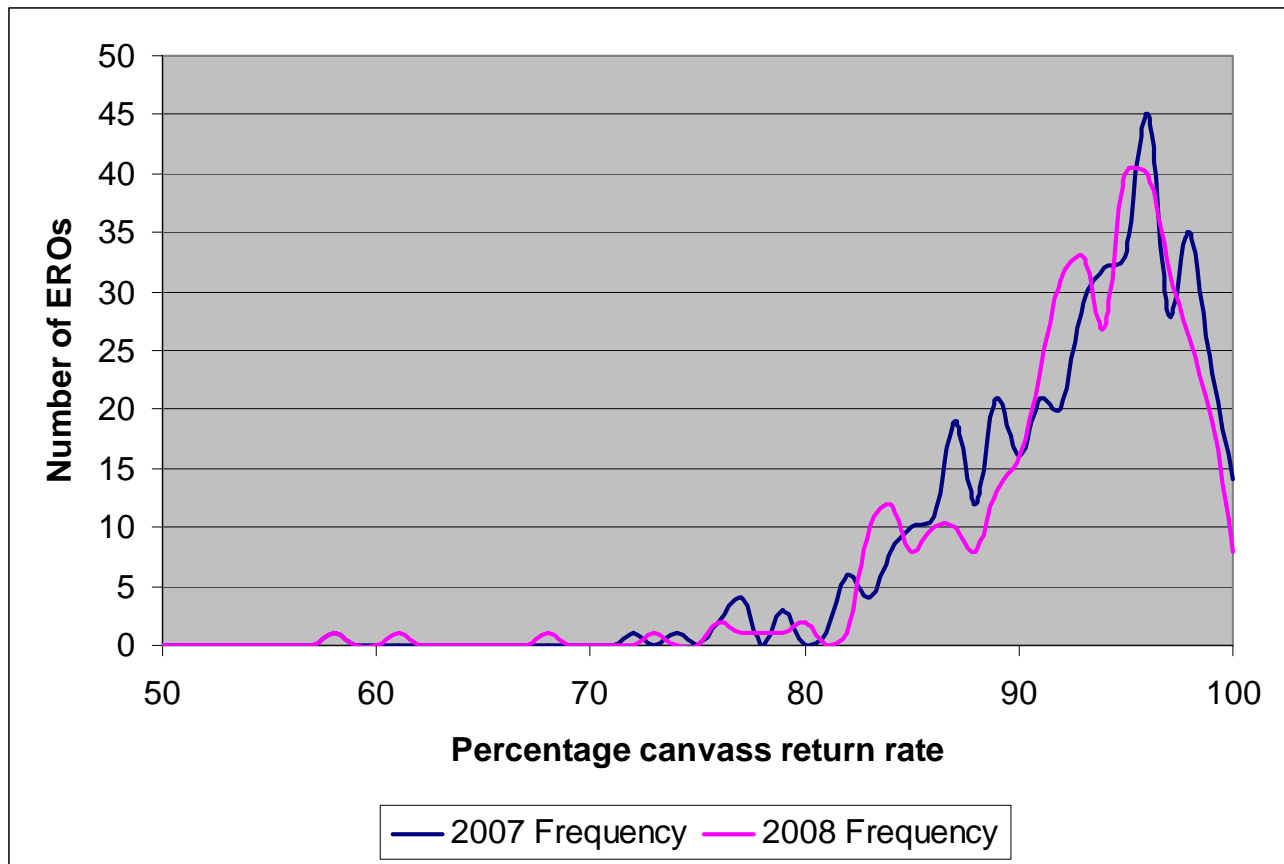


4.4 The average annual canvass return rate for 2008 has increased across Great Britain to 93% from last year's total of 92%. Electoral Registration in England had the highest average annual canvass return rate with 93% of forms returned, the same as in 2007. Wales also recorded the same average return rate as last year, at 89%.

4.5 Scotland has seen an increase of 6 points in the average percentage of annual canvass returns, to a total of 89%. In 2007 Scotland's lower return rate was explained by a difference in the method used by EROs to calculate the annual canvass return rate, which did not include households where the details were confirmed through council tax or other records. Our guidance was amended this year to clarify this point.

4.6 Chart 7 shows the distribution of all the results relative to the average annual canvass return rate for EROs in Great Britain in 2007 and 2008.

Chart 7: Annual canvass return rates comparison by frequency in 2007 and 2008

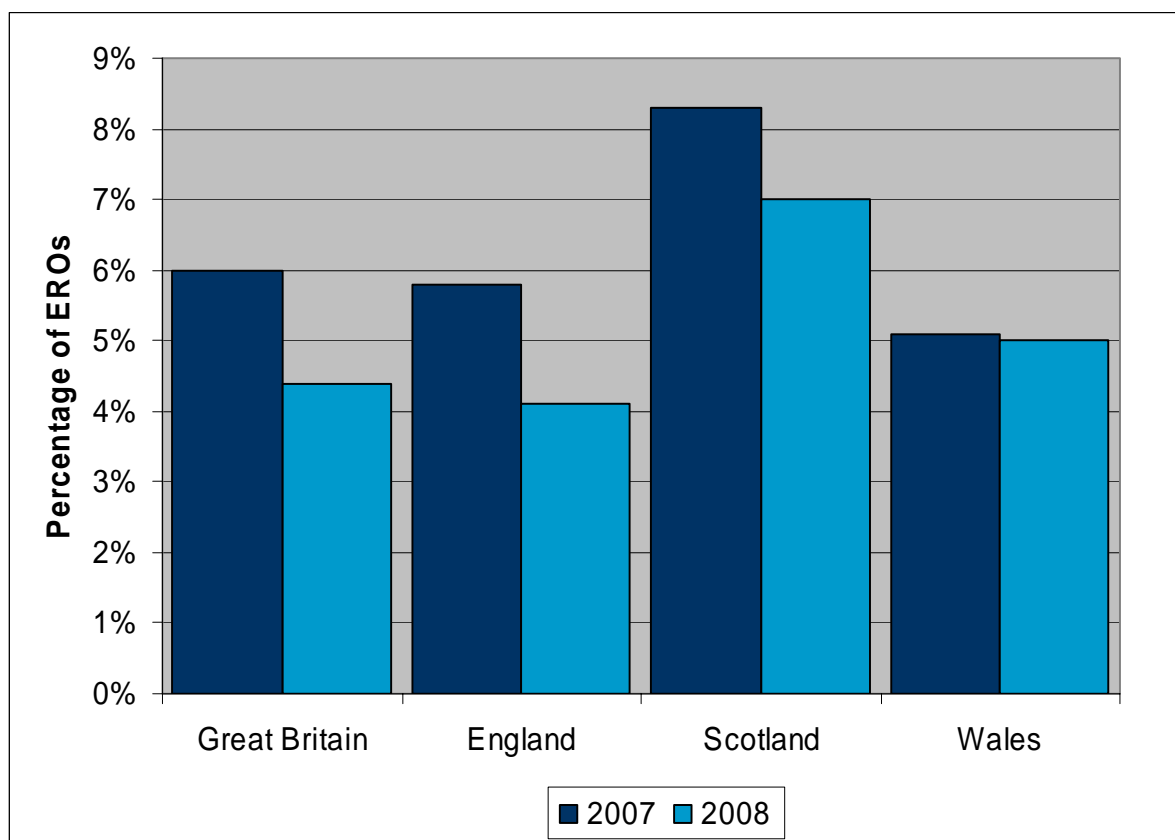


Carry forward of elector records

4.7 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 a ‘carry forward’ of an elector’s details. This indicator measured the number of entries on the December 2008 register that had been carried forward from the September 2008 register. In the absence of any specific measures of accuracy of electoral registration records, this measure offers a rough proxy measure, showing the proportion of records which are more than a year old.

4.8 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 2008 compared with the previous year. On average, the proportion of records carried forward by EROs for Scottish authorities was three percentage points higher than the average for Great Britain as a whole. The proportion of records carried forward was smaller in England and Wales (averages per authority of 4% and 5% respectively). There were two returns from EROs in Scotland above 15% that pushed Scotland’s average higher than the Great Britain average.

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



Changes to the number of registered electors

4.9 In February 2009 the Office for National Statistics released the official figures supplied by EROs for the local government and UK Parliamentary electoral registers in Great Britain.

4.10 Overall, the number of local government electors in Great Britain grew by 0.5% between December 2007 and December 2008, to 45.01 million. The number of Parliamentary electors in Great Britain grew by 0.2% to 44.06 million.

4.11 The number of electors increased at a greater rate in England, where the local government register grew by 0.5% and the Parliamentary register grew by 0.3%, compared with 0.3% and 0.2% respectively in Wales. In Scotland, while the number of electors included in the local government register increased by 0.1%, the number included in the Parliamentary register decreased by 0.1%.

5 Conclusions

5.1 Overall the first self-assessment against the performance standards for Electoral Registration Officers (EROs) paints a positive picture of performance across Great Britain. Although there are important areas where improvements are required in time for the 2009 annual canvass, we feel confident that there is a sound basis of performance on which to build.

5.2 Eighty-four per cent of EROs in Great Britain either meet or exceed each of the standards across the first subject area, *Completeness and accuracy of electoral registration records*. A clear improvement in the other three subject areas – *Integrity of the registration process*, *Encouraging participation in the registration process* and *Planning and organisation* – will help reach the overall objective of complete and accurate electoral registers and a well-run electoral registration process.

5.3 There appears to be a particular weakness in performance against standards which require evidence of formal documented plans to either meet or exceed the standard. Planning and preparation is key to providing a successful electoral registration process, which minimises the risks to complete and accurate registers. Comprehensive written plans, which can be easily followed, will help EROs plan their duties and create a more efficient process for a complete and accurate electoral register.

5.4 We have been encouraged both by the overall level of performance against the standards, and by the willingness of EROs and their teams to use the performance standards framework as a basis for continued improvement. However, there are still areas within *Integrity of the registration process*, *Encouraging participation in the registration process* and *Planning and organisation* where improvements need to be made. EROs should refer to the significant amount of resource and support material the Commission has already made available, such as the guidance manuals and the Do Politics website.

5.5 Up until the start of the annual canvass process in July 2009, the Commission will take positive steps, using the findings of this analysis, to provide further targeted support and guidance to help EROs who do not currently meet the standards to improve their performance. We will also work with regional and county groups to share good practice. We aim to have an action plan to take this work forward by the end of April 2009.

5.6 The proposed introduction of individual electoral registration in Great Britain will provide additional challenges for EROs. We will review the performance standards again once the practical and legal framework for collecting personal identifiers has become clearer later in 2009.

Appendix A – Completeness and accuracy in the electoral registration records

1. One of the Electoral Commission's corporate objectives is 'complete and accurate electoral registers supported by a well-run electoral registration process'. The United Kingdom needs electoral registers that are as complete and accurate as possible to underpin the integrity of our democracy and maximise participation by those eligible to vote.

2. Under Section 9 of the Representation of the People Act 1983 (RPA 1983) an Electoral Registration Officer (ERO) has a duty to maintain registers of Parliamentary and local government electors containing the name, qualifying address and electoral number of those persons appearing to them to be entitled to be registered in it. Furthermore, Section 9A of the RPA 1983 places a duty on the ERO to take all steps that are necessary for the purposes of maintaining the electoral register. Section 9A sets out the following steps:

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

3. There are three standards in this area:

- Standard 1 – Using information sources to verify entries on the register of electors and identify potential new electors (*Information sources*)
- Standard 2 – Maintaining the property database (*Property database*)
- Standard 3 – House-to-house enquiries (*House-to-house*)

4. These three standards look at the practices used by EROs to ensure that registers are complete and accurate by using a variety of sources and canvassing techniques. All three standards in this area are divided into four levels, with two levels in the 'Not currently meeting the standard' section. The lowest level indicates that the officer does not carry out any activities towards meeting the standard, while the second level indicates that some of the activities we would expect are being carried out, but not sufficiently to meet the standard. For the purpose of the analysis which follows, we have used only the three categories of performance ('Not currently meeting the standard', 'Performance standard', and 'Above the performance standard'), and have not illustrated findings relating to the levels within each category.

5. *Completeness and accuracy of electoral registration records* is the key subject area as one of the core responsibilities of the ERO is to maintain a

complete and accurate register. This is underpinned by the other subject areas, *Integrity, Participation and Planning*. It is encouraging that the vast majority (84%) of EROs across Great Britain said they meet or perform above all three standards in this subject area. No officers said that they did not currently meet all three of these standards.

6. The vast majority of EROs say that they are 'Above the standard' for *Standard 1: Information sources* and the majority of officers say that they meet *Standard 2: Property database* in ensuring the use of appropriate sources to keep the register updated (both elector entries and the property database). This suggests that most officers are being proactive in keeping the register updated. In particular, information from council tax departments used to verify and validate data held on the electoral register is commonly cited as a record used to meet *Standard 1* and using the Local Land and Property Gazetteer (LLPG) to maintain the property database for *Standard 2*. A very small proportion of EROs (two) said that they fall below *Standard 2* but *Standard 3: House-to-house* has a higher percentage of EROs below the standard (14% which equates to 57 officers).

7. *Standard 3* has a higher percentage of EROs below the standard than the other two standards in this subject area. Many officers who are below the standard said that whilst they carry out the annual canvass in accordance with the legislation and guidelines, there is no comprehensive written plan in place. Of these (57 EROs) only nine have also assessed themselves below *Standard 1*, and none below *Standard 2*.

8. This theme is mirrored in the other standards that require a written plan across the other subject areas. However, a number of EROs said that whilst they do not have one concise document, written plans are contained in a number of different documents. The verification of returns across Great Britain echoed these comments and found that evidence of comprehensive written plans was lacking. Instead much evidence comprised a canvass activity timetable or task list. It is therefore encouraging that the components of a plan are there, although it may just require pulling the elements together into a concise format.

Standard 1: Using information sources to verify entries on the register of electors and identify potential new electors

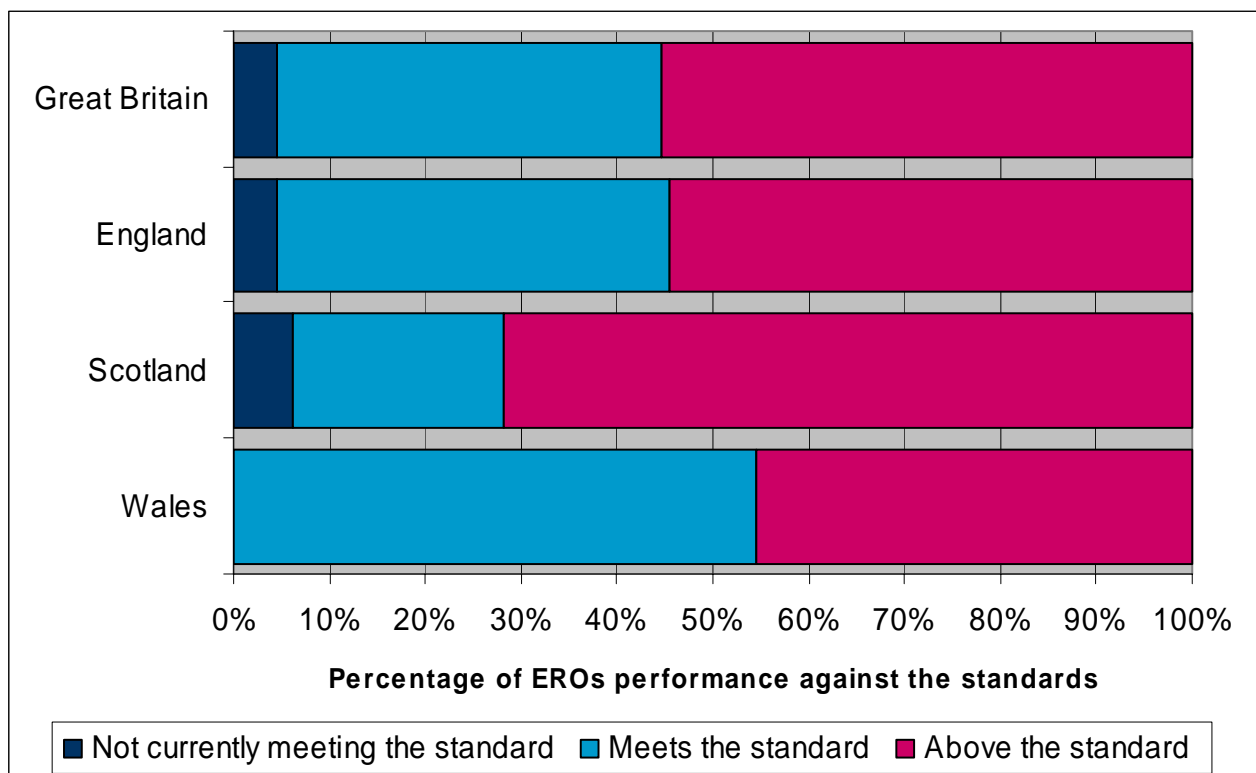
9. The aim of this standard is to ensure that EROs use the appropriate sources of information to verify records on the existing register of electors and identify potential new electors who come into the authority area. Some authority areas have a more transient population than others, so it is important to identify and record electors quickly to keep the electoral register as up-to-date as possible.

10. To meet the standard EROs are required to proactively identify and use the records they are entitled to inspect, throughout the year, to verify and validate data held on the electoral register. The guidance that we supplied suggested that these sources could be:

- the records produced periodically by the Registrar of Births and Deaths⁶ for the area
- council tax records
- housing records
- such other records of the council (including third parties providing a function of the council) that may assist them in carrying out their registration function

11. In order to be 'Above the standard', in addition to the requirements to be at the 'Performance standard', EROs should be able to demonstrate that they proactively attempt to use other sources of information, e.g. residential/care or nursing homes, or estate agents, where appropriate. Specifically, they should be able to provide documented evidence of the contact made with new residents arriving in the local authority area and the action taken to register them.

Chart A1: Breakdown of Standard 1: Information sources across Great Britain



12. As Chart A1 shows, over half of EROs across Great Britain assessed themselves 'Above the performance standard', with 40% meeting the standard and a small minority (18 EROs) below the standard. This suggests that most EROs are proactive in using other information sources to keep the register updated. This seems to be an area where a significantly high percentage of EROs are above the standard compared to *Standards 2–10*.

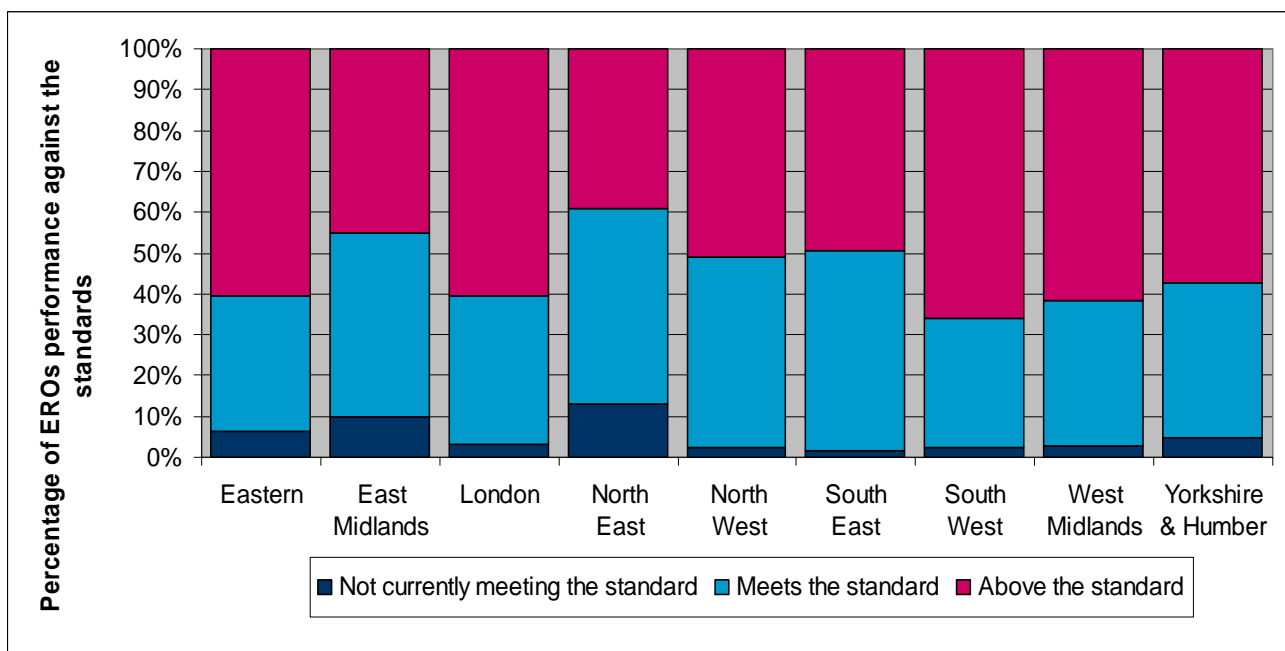
⁶ In Scotland, it is the Registrar of Births, Deaths and Marriages.

13. In Scotland only one ERO, appointed by two Scottish councils, reported that they did not currently meet *Standard 1: Information sources*. Officers for 23 of the 32 Scottish Councils (72% of the total) reported that they exceeded *Standard 1*.

14. Two EROs in England said that, at the time, they only relied on annual canvass returns and rolling registration applications to maintain the register, and used no other sources of information to verify records. Both these authorities have, however, been awaiting access to council tax records which will enable them to meet the performance standard next year.

15. The breakdown for each English European Parliamentary region is relatively similar to the breakdown for Great Britain and is shown in Chart A2. The East and South West of England, London and the West Midlands all have nearly two-thirds of EROs assessing themselves 'Above the performance standard' and, consequently, have a lower percentage (than the Great Britain average) assessing themselves as 'meeting the standard'.

Chart A2: Breakdown of Standard 1 by English European Parliamentary regions



16. The majority of EROs who were at the 'Performance standard' said they use information from council tax departments to verify and validate data held on the electoral register. Around a quarter of these EROs also said that they liaise with council tax departments to ensure that registration forms are sent out to residents of newly occupied properties and/or are included in home-mover packs. This would satisfy the requirements to be 'Above the performance standard' and it, therefore, may be that a number of EROs who have assessed themselves as meeting the standard are in fact meeting the requirements for the higher level. A possible reason for those EROs not assessing themselves 'Above the standard' may be that although the processes are in place, they do not have a system in place for recording when

these checks are made, which is needed as evidence to support the assessment to be 'Above the standard'.

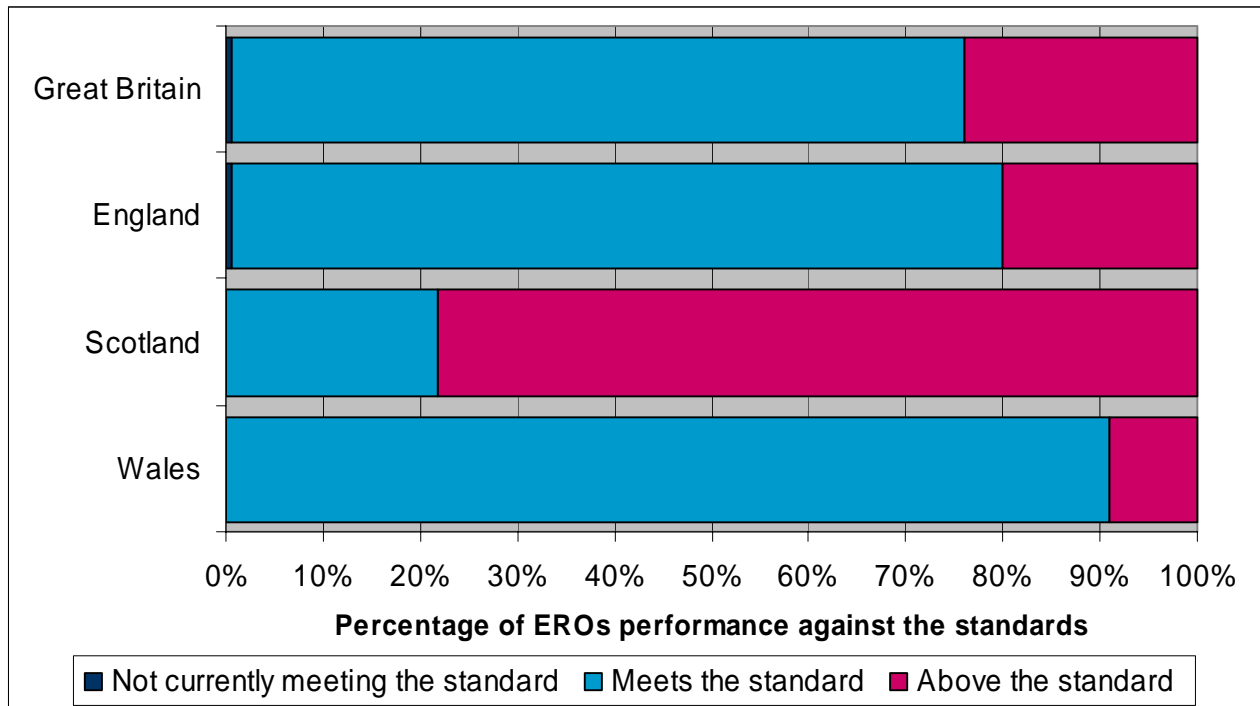
17. A minority (18 EROs across Great Britain) assessed themselves below this standard. The most common reason given was that records are inspected during the annual canvass period only to verify and validate data, and not on a regular basis throughout the year. In order to maintain an accurate electoral register, the registration process should be a year-round activity and should not focus solely on the annual canvass. EROs should verify and validate data throughout the year.

Standard 2: Maintaining the property database

18. The aim of this standard is to ensure that EROs use all the available sources of information to guarantee all relevant properties are included in the property database. This is crucial to maintaining an accurate register as the ERO will require a comprehensive property database in order to canvass potential electors within their registration area.

19. To meet the standard, EROs are required to maintain the property database on a continuous basis throughout the year, using the records available to them. These include council tax records, the register of households in multiple occupations, the Local Land and Property Gazetteers (LLPG) and Corporate Address Gazetteers (CAGs), and canvassers. In order to be above the standard, in addition to the requirements to meet the standard, EROs are required to use external sources (such as Royal Mail) and undertake other activities to update the property database.

Chart A3: Breakdown of Standard 2: Property database across Great Britain



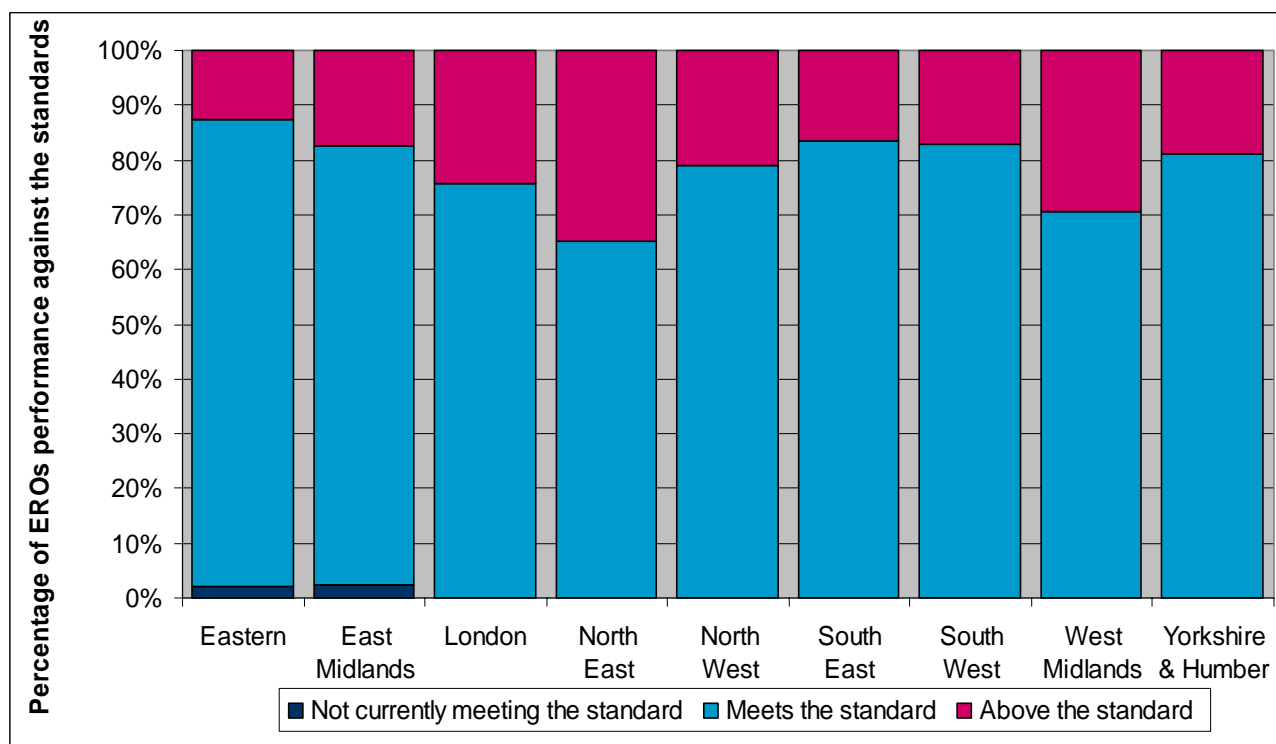
20. As Chart A3 illustrates just under a quarter of EROs across Great Britain assessed themselves above this standard, with three-quarters at standard and a very small minority (two EROs) below standard. This shows that nearly all EROs use the sources identified in our guidance to maintain the property database.

21. Scotland has a much larger percentage of EROs assessing themselves above the standard. In the majority of cases, the persons appointed as EROs in Scotland are also the Assessor.⁷ The Assessor is responsible for the valuation of both domestic and non-domestic properties for the purposes of council tax and non-domestic rates. Therefore, 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.

22. In Wales, all the EROs assessed themselves as either meeting or above the standard, a larger proportion of these assessed themselves as 'Meeting the standard' than anywhere else. The breakdown for each English European Parliamentary region is relatively similar to that of Great Britain and is shown in Chart A4 below.

⁷ Dundee City Council has appointed one of its own officers to act as the Electoral Registration Officer separate from the Assessor.

Chart A4: Breakdown of Standard 2 by English European Parliamentary regions



23. Two EROs assessed themselves as below this standard. One stated that they will look to meet the standard in the future by using the LLPG to maintain the property database.

24. A number of EROs said that they were not clear what external sources would be of use to update the property database in addition to those that are already used to meet the standard. Some questioned the benefit of using Royal Mail as a source, other than for checking post codes, and said that the use of the Land Registry does not add value particularly as it is a service that would require additional financial resources. Additionally, some authorities have stated that they have a high matching percentage with the LLPG and therefore did not see the merit in using external sources.

25. In order to be assessed 'Above the standard' EROs must also show evidence of undertaking other activities to update the property database. This may include using canvassers to validate the database when making house-to-house enquiries. We will review our guidance on this particular standard in the future, to give EROs who carry out such activities the opportunity to assess the opportunity themselves as 'Above the performance standard'.

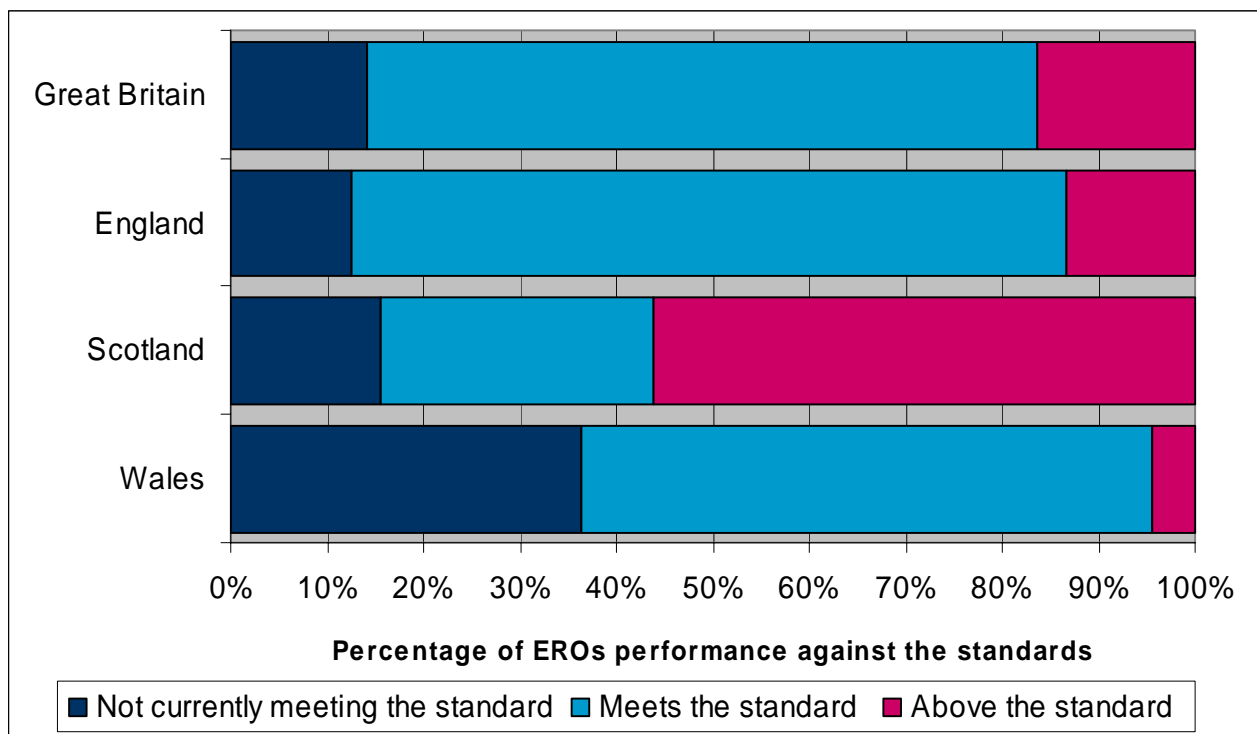
Standard 3: House-to-house enquiries

26. Section 9A of the Representation of the People Act 1983 places a duty on the EROs to take all steps that are necessary for the purposes of maintaining the electoral register. One of the steps that is necessary to maintain the electoral register, as outlined in paragraph 1.2, is to make, on

one or more occasion, house-to-house enquiries to ensure that the residents present are correctly registered on the electoral register. This standard aims to ensure that EROs have the necessary plans and processes in place to effectively carry out house-to-house enquiries.

27. To be at the 'Performance standard' EROs should have a comprehensive canvass plan which identifies the criteria for when house-to-house enquires should be made and how the enquiries are monitored through effective recording by canvassers. To be 'Above the performance standard', in addition to the plan, officers are required to have a specific strategy for carrying out house-to-house enquiries and in particular provide for personal visits to be carried out throughout the year. The strategy should identify the detailed process for dealing with house-to-house enquiries while the plan should identify how to carry the process out.

Chart A5: Breakdown of Standard 3: House-to-house enquiries across Great Britain



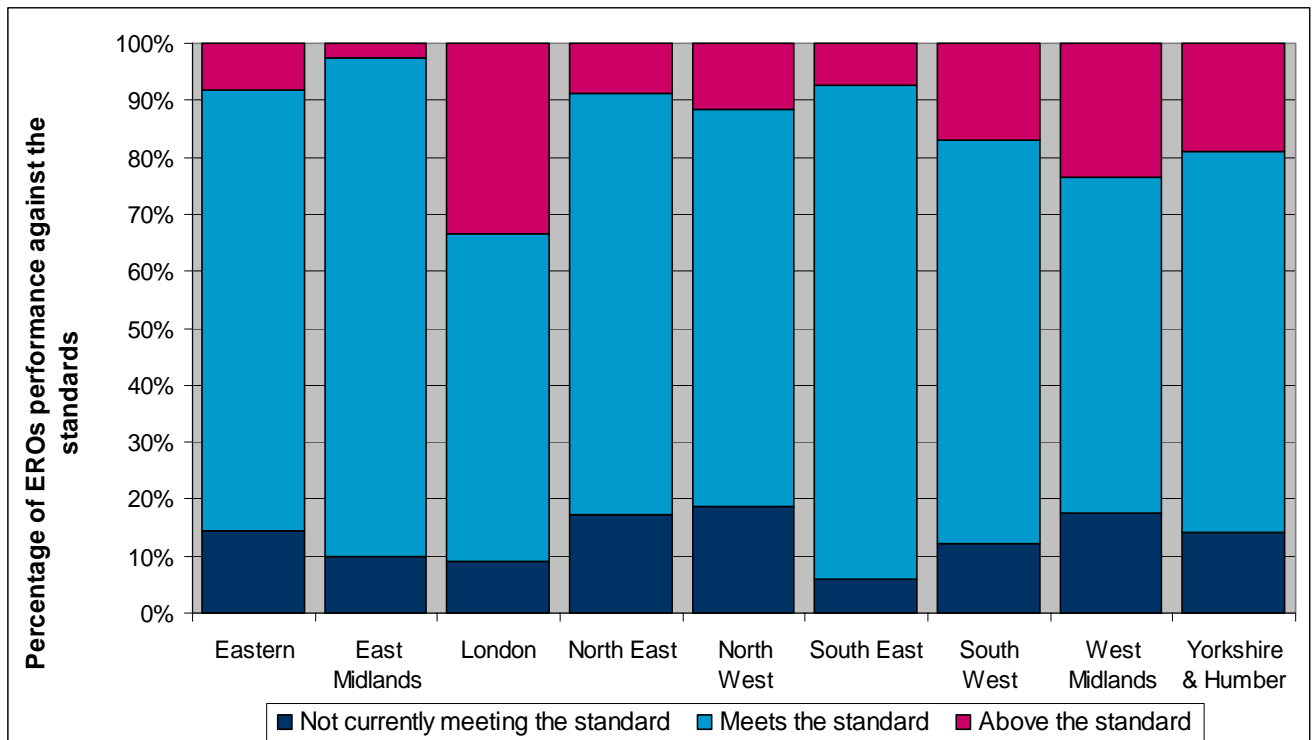
28. Chart A5 shows that the vast majority (over two-thirds) of EROs in Great Britain say that they meet this standard, with 16% above the standard and 14% below standard. Of those that say they are below the standard, 10% say they have a written plan but have not met their specified objectives and 4% say that they do not have a plan at all.

29. Although it seems that Scotland has a high percentage of EROs assessing themselves above this standard compared to Great Britain, putting this into context it represents three EROs (appointed by three Scottish Councils) below the standard and six EROs (appointed by 18 Scottish Councils) above. Likewise in Wales, although just over a third of EROs in

Wales assessed themselves as below this standard, this represents eight EROs.

30. The breakdown for each English European Parliamentary region varies slightly and is shown in Chart A6.

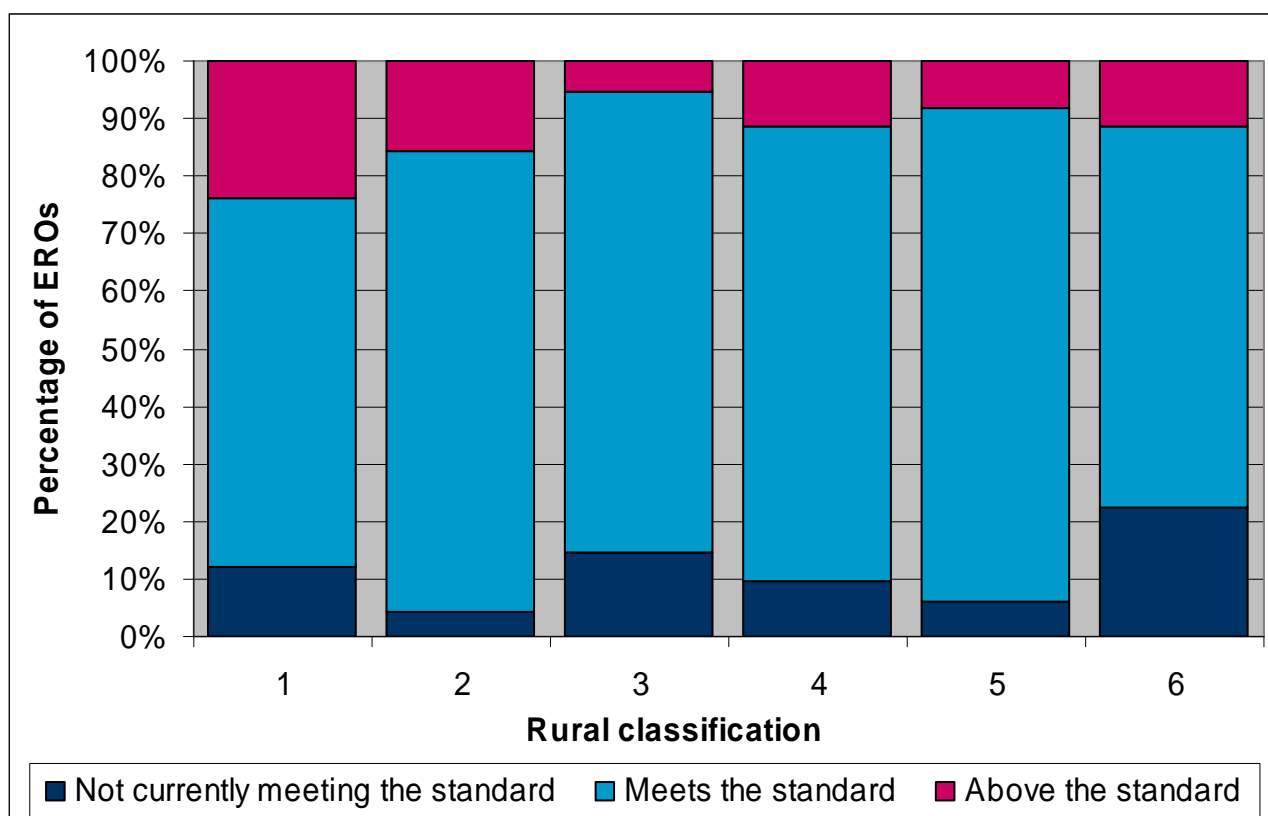
Chart A6: Breakdown of Standard 3 by English European Parliamentary regions



31. This standard is one of four which requires a documented plan, the others being *Standard 4: Integrity*, *Standard 6: Public awareness* and *Standard 9: Planning*. Some officers reported that while they are confident that they carry out the annual canvass in accordance with the legislation and guidelines, there is no comprehensive written plan in place. This theme is mirrored in the other standards that require a written plan.

32. Feedback also suggests 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 both rural and densely populated urban areas. Although we recognise that EROs should use their own judgement in deciding whether house-to-house enquiries are needed, they must be able to demonstrate that all necessary steps have been taken in respect of all properties in their area. Where all other steps have been exhausted, EROs must ensure that appropriate resources are provided to ensure that a personal visit by one or more canvassers is undertaken – even in relation to isolated rural areas or challenging urban situations – in order to comply with their statutory duties.

Chart A7: Breakdown of Standard 3 by rural classification



33. Chart A7 shows the number of EROs who are below, meet, or are above the standard for each of the varying degrees of rural classification. These rural classifications⁸ refer to '1' being urban and '6' being the most rural. As the chart shows there are a number of authorities where EROs have assessed themselves below this standard, with officers at the most rural authorities (level 6) more likely to say that they are 'Not currently meeting the standard'. However, the majority of officers in rural authorities meet this standard and a small number have assessed themselves as above.

34. A number of EROs said that although they do not have one concise document, written plans are contained in a number of documents, e.g. a canvass timetable, canvasser instructions, canvasser statements and progress reports and, therefore, have assessed themselves as meeting the standard. The verification of returns across Great Britain found that evidence of comprehensive written plans was lacking and instead much evidence comprised a canvass activity timetable or task list. There was also a number of EROs, who although they could provide such documents assessed themselves as 'Not currently meeting the standard'.

35. The most common reason given by EROs for not assessing themselves 'Above the standard' was lack of resources. Some said that although they

⁸ Provided by the Department for Environment, Food and Rural Affairs (Defra) and applies to England only.

carry out elements of this level, they do not have the resources to ensure personal visits are carried out throughout the year.

Appendix B – Integrity

1. The Electoral Commission has monitored issues around electoral malpractice since the first Commission report on elections in 2001. We have carried out this work within the context of our overarching powers to keep electoral law and practice under review⁹ and to report on major elections. However, the introduction of the performance standards framework has enabled us to look in more depth at some of the processes Electoral Registration Officers (EROs) have in place to tackle electoral malpractice and whether they adhere to the statutory guidelines to supply the electoral register to those who require it in a timely manner.
2. The ERO is responsible for compiling and maintaining the register of electors, which contains an entry for everyone who has registered to vote. The ERO's responsibilities also include registering applications to vote by post or proxy and applications from people who wish to register to vote anonymously.
3. There are two standards in this area:
 - 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*)
4. Unlike some of the other subject areas, these two standards differ with one requiring planning and the other being a statutory duty. A large percentage of EROs said that they do not meet *Standard 4: Integrity*, principally due to the lack of a written plan. Nearly all meet the remainder of the criteria to achieve the standard.
5. A very small number of officers in Great Britain said that they were below *Standard 5: Supply and security* (they were also below *Standard 4: Integrity*). This was due to the lack of guidance given to staff with access to the register, and not for failing to supply the register. The supply of the register is a statutory duty and the standard was developed to reflect this. We would therefore expect all officers to meet this standard.

Standard 4: Maintaining the integrity of registration and absent vote applications

6. To promote public confidence in the electoral process it is vital that electoral registers are accurate and every effort is made to ensure that false applications are detected and do not get onto the register or are removed at the earliest opportunity. The electoral register is the gateway to voting. It is the first area to be targeted by those seeking to commit malpractice for electoral purposes or to support non-electoral crime such as financial fraud or illegal

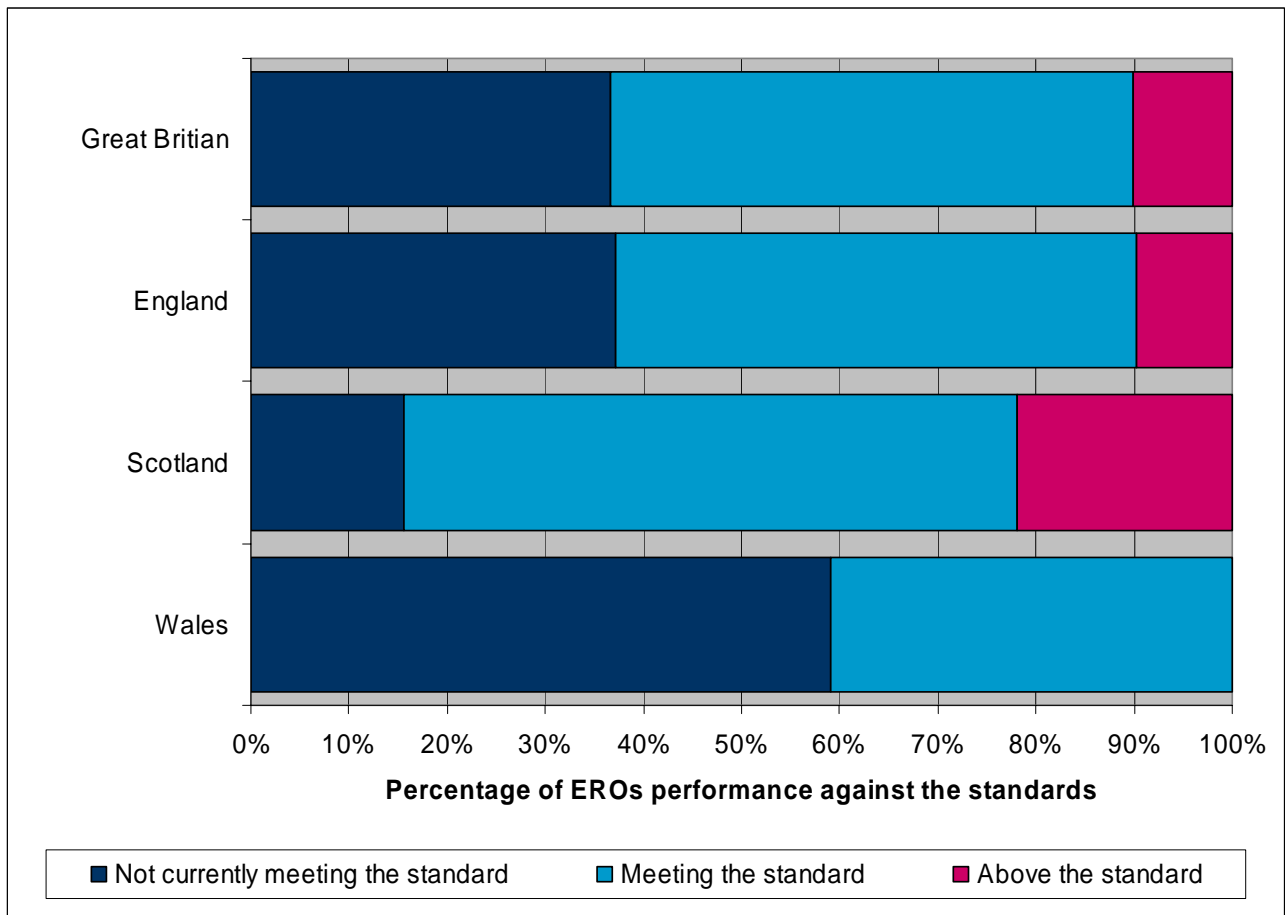
⁹ Section 6, Political Parties, Elections and Referendums Act 2000 (PPERA)

immigration. A planned and positive approach to maintaining the integrity of the register is essential.

7. The aim of this standard is to ensure that EROs have a process in place to identify any patterns of activity that might show electoral malpractice. The standard is divided into five levels, with two levels being below the standard and two levels above. The lowest level in the 'Not currently meeting the standard' category indicates that the ERO does not carry out any activities towards meeting the standard, while the second level indicates that some of the activities we would expect are being carried out, but not sufficiently to meet the standard. For the purpose of the analysis which follows, we have used only three categories of performance ('Not currently meeting the standard', 'Performance standard', and 'Above the performance standard'), and have not illustrated findings relating to the levels within each category.

8. To be at the standard, EROs are expected to have a written plan which demonstrates how they deal with specific registration or absent vote applications as well as the criteria they use before referring the issue to their police service single point of contact (SPOC).

Chart B1: Breakdown of Standard 4: Integrity across Great Britain



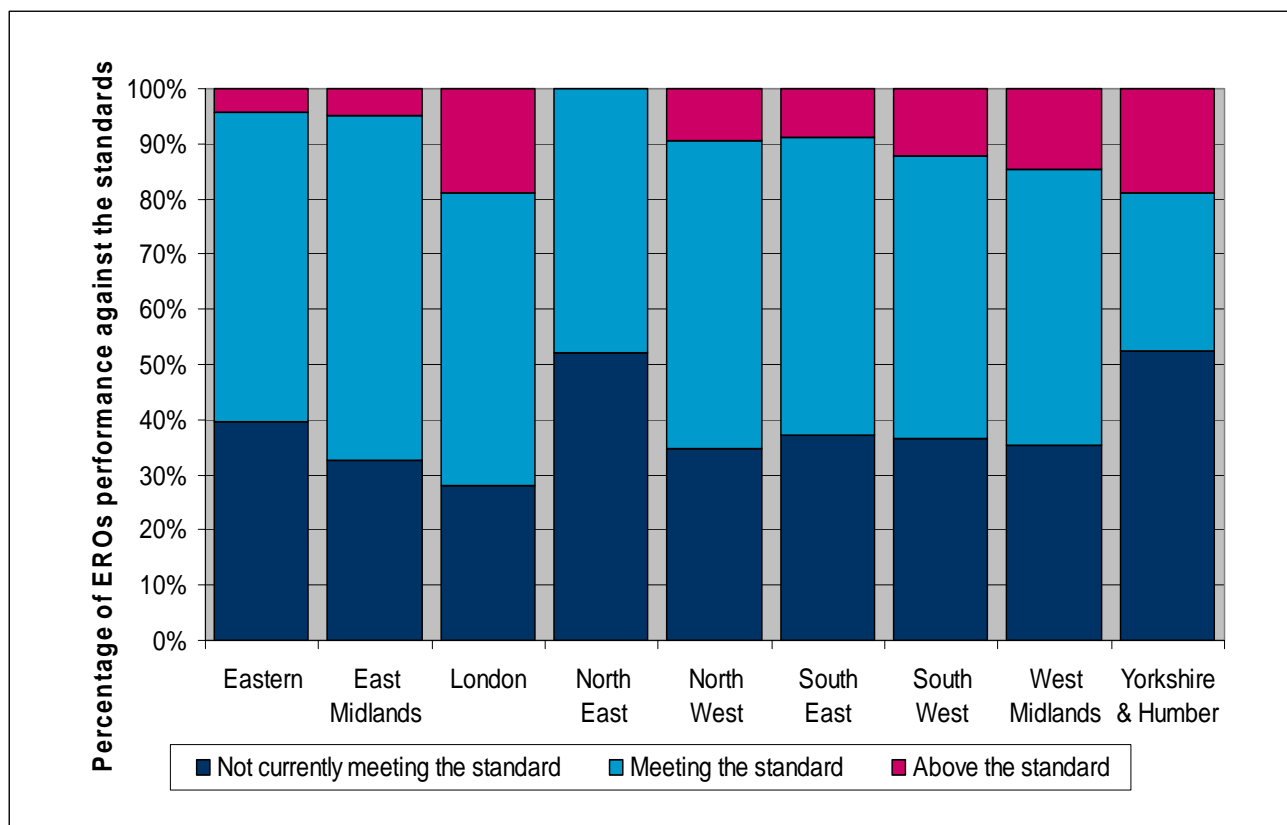
9. Chart B1 shows that the majority of EROs in Great Britain say that they meet the standard. However, there is also a significant proportion (just over

36%) who fall below. Just under 60% of EROs in Wales say that they do 'Not currently meet the standard' and just over 15% in Scotland. The vast majority of those EROs who have assessed themselves below this standard said that informal plans are in place, but these are not necessarily documented. Most have contact with their SPOC and keep registration forms for the life of the register and absent vote applications until the application is cancelled. However, they fail to meet the standard due to the lack of a documented plan.

10. A very small number of EROs across Great Britain say that they do not carry out any checks to ensure integrity of registration or absent vote applications, which is not only a cause for concern, but also a clear area where performance can be improved. None of these authorities provided narrative feedback.

11. Just under two-thirds of EROs in Scotland say they are at the 'Performance standard' with just over a fifth 'Above the standard', the highest proportion across England, Scotland and Wales. In order to be above the standard, EROs should be carrying out a risk assessment of their plan and then evaluating the risk assessment to be at the second level above the standard. A small but significant number of EROs assessed themselves above the standard in England, as Chart B2 shows, with performance across England being largely similar to that across Great Britain as a whole.

Chart B2: Breakdown of Standard 4 by English European Parliamentary regions



12. EROs in London represent the highest proportion 'Above the standard', with the North East having the most officers that have assessed themselves below. The majority of EROs say that they have a written plan for integrity issues, but there are a significant proportion who do not document these plans. As part of the verification process, Commission staff looked at some of the plans and processes that EROs had. We found that there was still room for improvement in terms of the documented plans used, where the plan tended to consist more of a simple checklist rather than a plan as specified in our guidance. This is an area that the Commission intends to look at over the coming months.

13. In addition, we found that EROs who had experienced electoral fraud were more likely to have a strategy, than those who had not.



To promote public confidence in the electoral process, it is vital that electoral registers are accurate and every effort is made to ensure that false applications are detected and do not get onto the register, or are removed at the earliest opportunity. Therefore we would expect all officers to document a plan to check the integrity of registration and absent vote applications. We intend to work with EROs and other groups to support those who do not have these plans in place to ensure that they can meet the standard in 2009.

Standard 5: Supply and security of the register and absent voter lists

14. The ERO has a duty to supply free copies of the register of electors to various organisations e.g. the Electoral Commission, Office of National Statistics, the British Library and individuals, and legislation imposes restrictions on how this is done. In some cases, registers have to be supplied on publication and in others the register is only supplied on request.

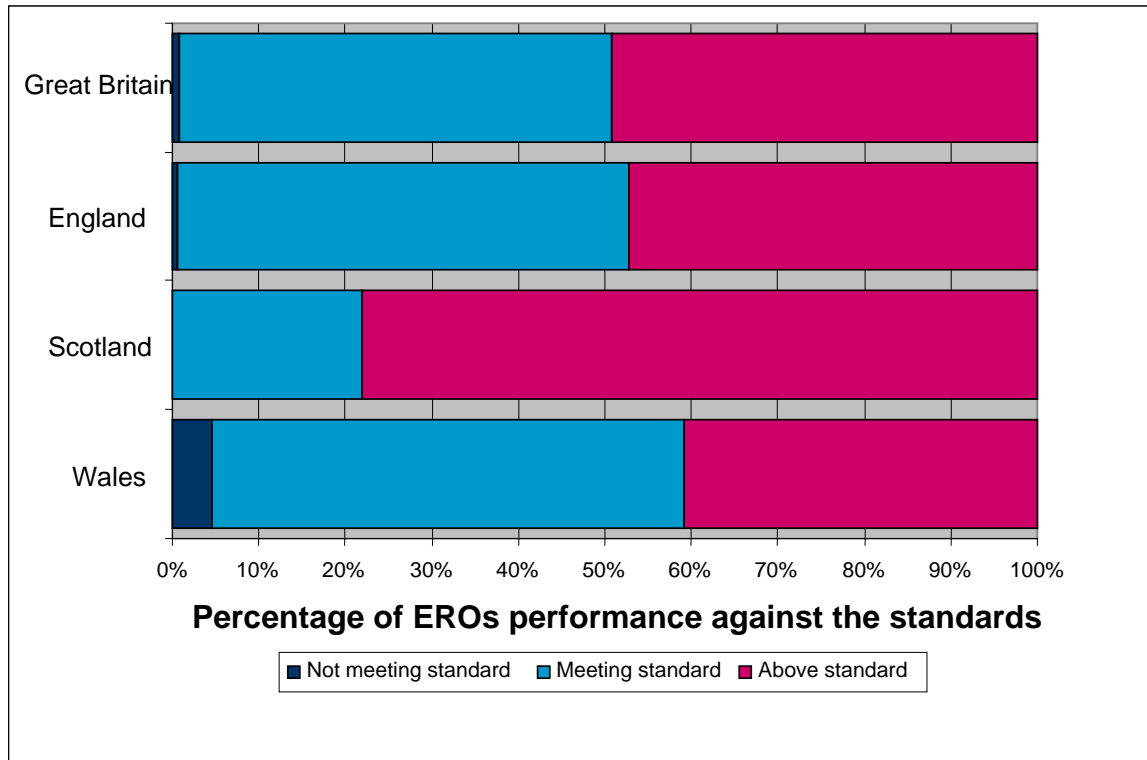
15. Elected representatives, candidates, registered political parties and local constituency parties may also request that the ERO supply, as soon as possible after the request is made and free of charge, a copy of:

- the current version of the absent voting record which would, in the event of a particular election being called, be included in the absent voting lists to be used at that election
- the current or final version of the absent voting lists for a particular election

16. The purpose of this standard is to ensure that once published, EROs ensure that the full register is made available for public inspection and supply copies of the register and absent voter lists to those prescribed in legislation. In addition to this, the ERO ensures that adequate guidance is provided to staff who supervise access to the register as well as recipients who use it. The standard is divided into the three basic levels. In order to be 'Above the standard' EROs are expected to have a complaints process in respect of the

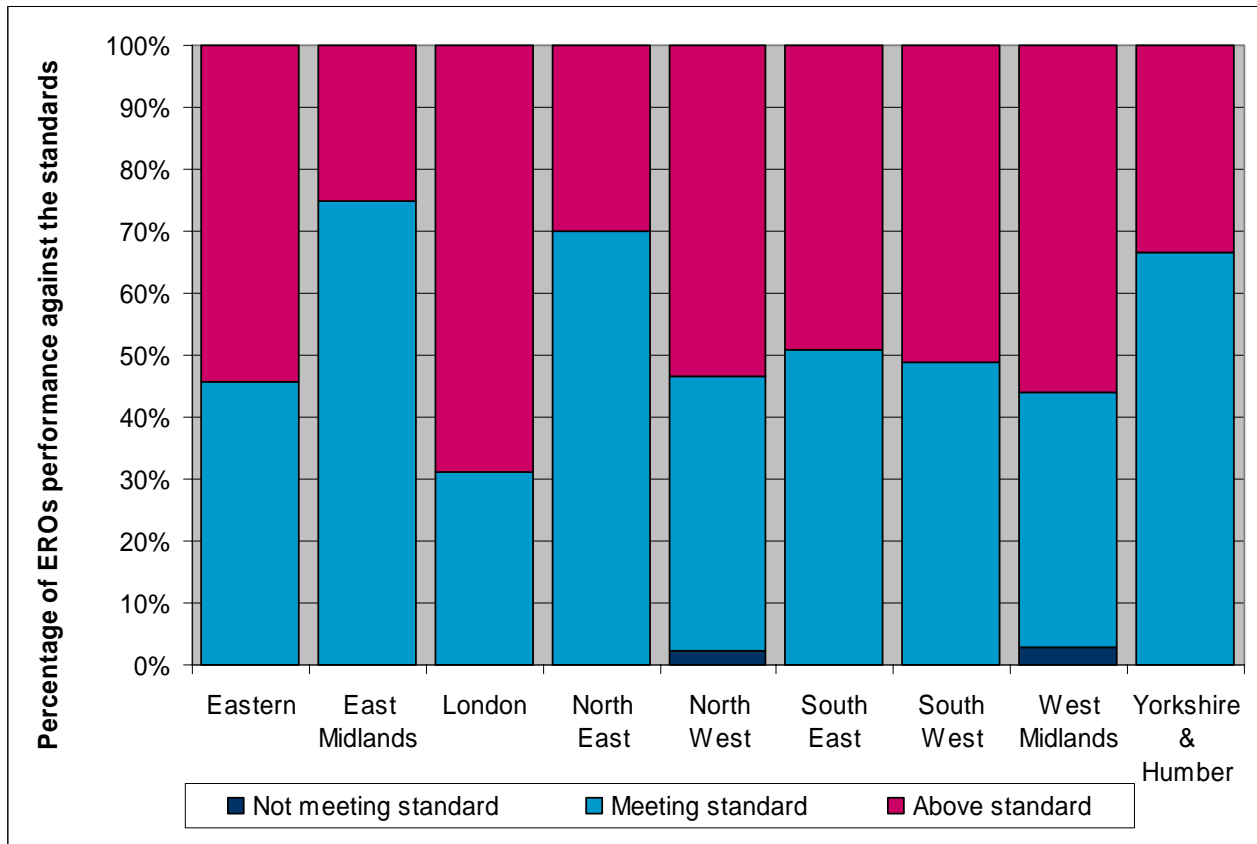
supply of the register and record all transactions of sales and supply of the full and edited register.

Chart B3: Breakdown of Standard 5: Supply and security across Great Britain



17. Chart B3 shows that nearly all EROs in Great Britain meet the standard, with roughly half saying that they are 'Above the standard'. One ERO in Wales and two in England said that they did not meet the standard. They said that they did not provide training and guidance to those supervising the register, thereby not meeting the full criteria to be at the standard. EROs covering three-quarters of Scottish councils have assessed themselves above the standard, demonstrating the use of a complaints process, either within the team or most commonly from the council.

Chart B4: Breakdown of Standard 5 by English European Parliamentary regions



18. Over two-thirds of EROs in London say they are above the standard, the most of all the European Parliamentary regions. All of the local authorities we visited in London said that they used the complaints process that had been put in place by the council. However, they also said that they had not yet had any complaints. The use of a complaints process was the key issue that separated EROs between the 'Meet the standard' and the 'Above the standard' section. A small number of authorities have a complaints process independent from the council.

! The supply of the electoral register is a statutory duty and our analysis has shown that all EROs supply the register to those that are entitled to it. However, we will continue to work with officers who need support to produce guidance for those who supervise access to the register. The vast majority of officers also use their councils' complaints process which is sufficient to ensure that complaints are deal with properly and effectively.

Appendix C – Participation

1. *Standards 6, 7 and 8* focus on the Electoral Registration Officer's (ERO's) responsibility to manage an easy and accessible process, for candidates and electors.
2. The participation standards are
 - Standard 6 – Public awareness strategy (*Public awareness*)
 - Standard 7 – Working with partners (*Working with partners*)
 - Standard 8 – Accessibility and communication of information (*Accessibility and communication*)

All of these areas play a key role in encouraging voters to participate in the electoral process.

3. *Standard 6: Public awareness* had the highest number of officers assessing themselves below the standard. This, for reasons already mentioned, was due to the lack of a written plan. Many of these EROs say that they aim to have written plans for next year in order to meet the standard.
4. Just under a third of all officers across Great Britain either meet or exceed all three standards. Two-thirds of officers who said that they do not have a public awareness strategy said that they also do not currently meet the standard for working with partners and a third do not take into account the need for different audiences when communicating information. *Standard 6* is the worst performing standard in the participation section. For the purpose of the analysis which follows, we have used only the three categories of performance 'Not currently meeting the standard', 'Performance standard', and 'Above the performance standard', and have not illustrated findings relating to the levels within each category.
5. It is followed by *Standard 7* and then *8*.



Participation is an area that requires improvement in order to improve the overall accuracy of the electoral register. Although some EROs are carrying out good initiatives to encourage participation, we will work with those facing difficulties in meeting the standard to encourage them and share good practice. The first thing will be to ensure that all those who did not meet the standard due to the lack of a public awareness strategy can do so next year by following the templates shown on the Do Politics website, which contains all the material required to be able to meet the standard.

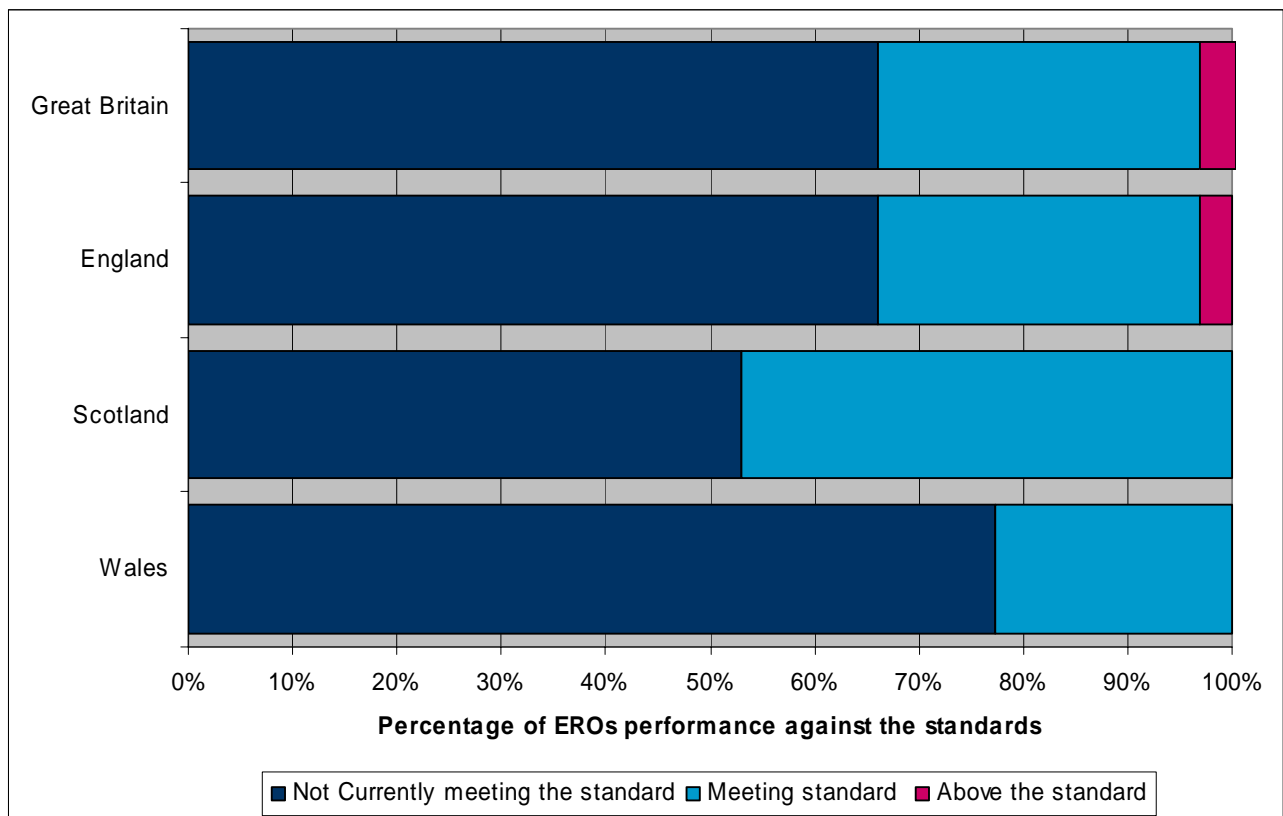
Standard 6: Public awareness strategy

6. This standard is divided into four levels with two levels below the standard. The lowest level in the 'Not currently meeting the standard' category indicates that the ERO does not carry out any activities towards meeting the standard, while the second level indicates that some of the activities we would

expect are being carried out, but not sufficiently to meet the standard. In order to meet this standard, EROs must provide a documented public awareness strategy clearly defining objectives, target audiences, potential risks, and evaluation procedures. In order to be 'Above the standard' officers are expected to assess the needs of different audiences, carry out a proactive analysis of the lessons learnt from the evaluation of the plan, and plan for different activities throughout the year to encourage participation in the registration process.

7. A public awareness strategy is the bedrock of public awareness work, setting out the aims, audiences, timelines, actions and evaluation measures of any awareness activity carried out. This helps to avoid isolated, granular or reactive activity that is not properly planned or evaluated. It ensures value for money and continuity planning. Most importantly, it ensures that EROs have considered all parts of their local population, and are planning appropriate and measurable activity that is tailored to their electors.

Chart C1: Breakdown of Standard 6: Public awareness across Great Britain



8. Chart C1 shows that just under two-thirds of EROs said that they did not meet this standard, the highest proportion of all the 10 standards. A total of 12 EROs assessed themselves above standard, with 30% stating they were at the 'Performance standard'. This standard has the highest number of officers assessing themselves below the standard within this subject area.

9. Scotland has the highest percentage of EROs saying that they meet the standard with just under 47% at this level. England has the next highest with over 30% meeting the standard.

10. Overall, Wales has the highest percentage of authorities not meeting standard with 77% of EROs assessing themselves at this level. Just under half of these provided us with feedback – the majority said that they did public awareness work, but this was not documented in a way to meet the criteria specified. A quarter of these said they had moved away from general public awareness work, to focus on work with young people. Some also said that this was not a priority area for under-resourced teams.

11. A total of 12 EROs in England said that they were 'Above the standard'. The narrative information that we received indicates a significant number of those not meeting the standard do have some public awareness strategy in place. The determining factor between an assessment at the 'Performance standard', or 'Not currently meeting the performance standard', is the lack of documented processes. This is a common trend across Great Britain, as highlighted in *Standards 3 and 4*. The lack of an evaluation process and no risk register were other reasons given for 'Not currently meeting the performance standard'.

12. A number of authorities have said that they will have a written strategy in place for next year's assessment, and we will monitor this in future. Many authorities cite lack of resources as a contributing factor in not meeting the standard. Most notably, these are financial or staffing constraints. Some EROs have said that they referenced that they use of the Ministry of Justice Electoral Participation Fund for their participation work.



Although Electoral Registration Officers have cited resources as a reason for not meeting standard, there is substantial help available through the Electoral Commission's Do Politics website. The information consists of press release forms and other resources. It is free to download and would help the ERO meet the standard.

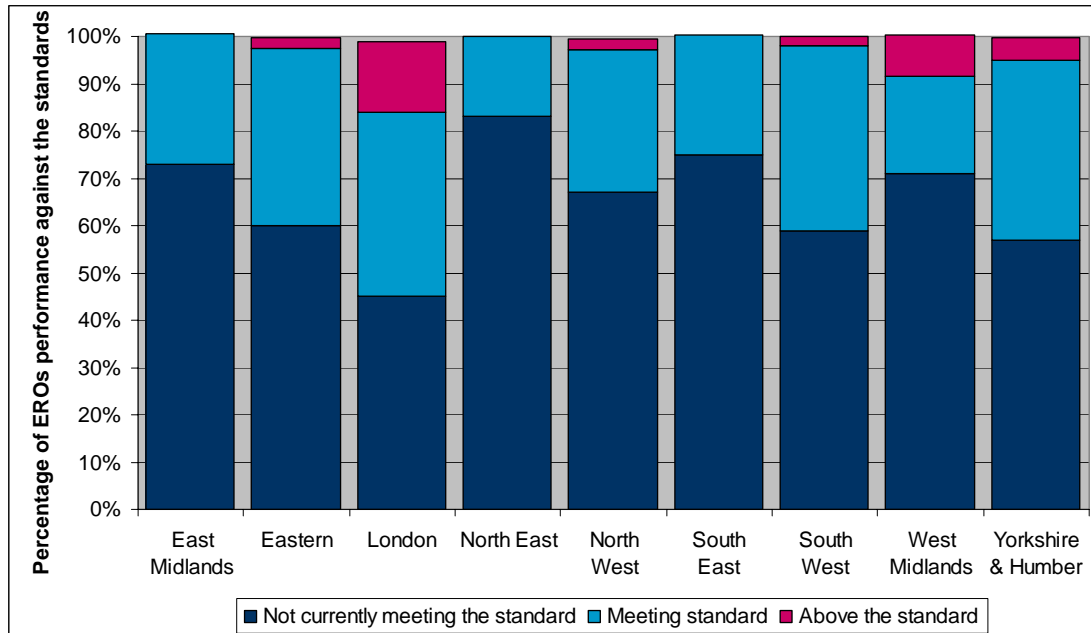
13. EROs saying that they meet the standard have included a variety of public awareness activities. These include bus/poster campaigns, radio commercials, and adverts in local authority newsletters/magazines. Some proactive measures, such as targeting students and attainers by sending them birthday cards, and by holding local democracy weeks were also found.

14. The verification visits for this standard have highlighted similar trends across Great Britain as to why authorities do not meet the standard. Frequently, EROs have no separate budget for public awareness and lack awareness and understanding of their legal obligations to promote registration work. However, some officers showed detailed and documented public awareness strategies.

15. In London, 15% of EROs (five) assessed themselves as above standard, the highest out of the regions. London also has the highest number of officers

saying that they are at the performance standard with 39%, the only region with more than half of its EROs either meeting, or exceeding the standard.

Chart C2: Breakdown of Standard 6 by English European Parliamentary regions



Standard 7: Working with partners

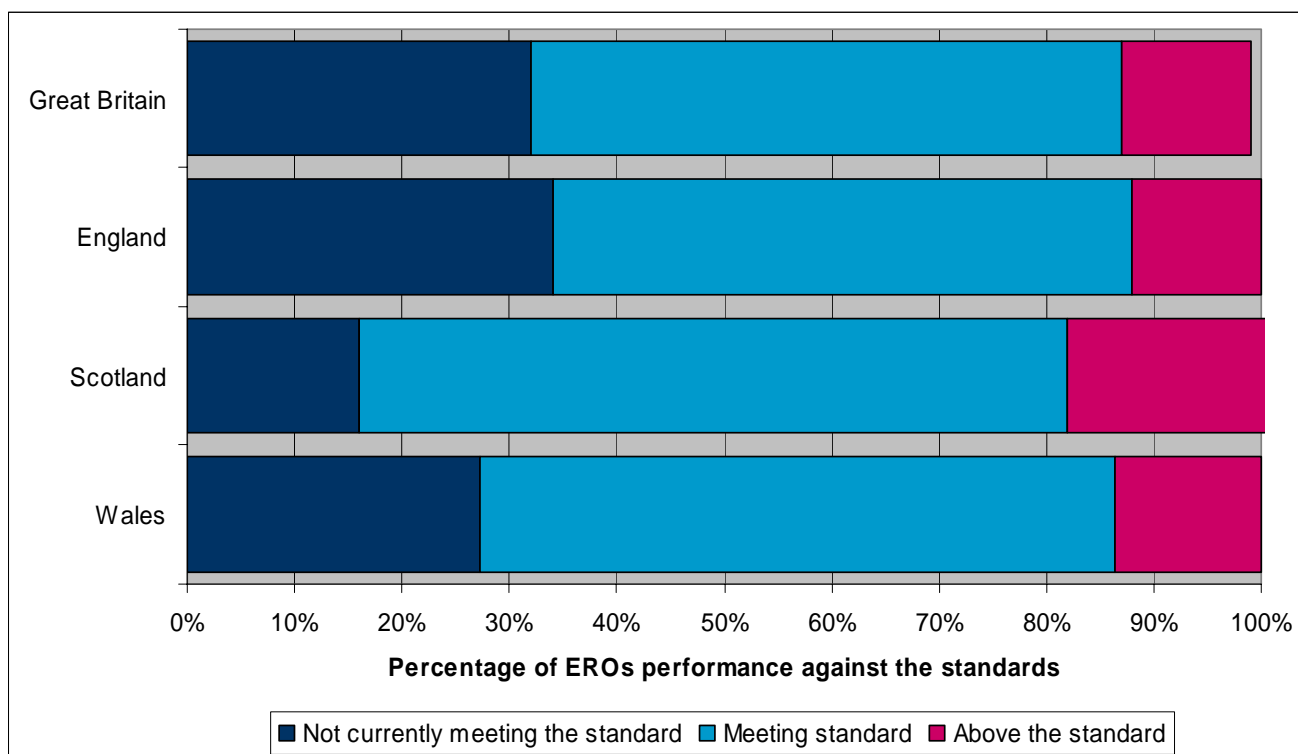
16. The aim of this standard is to ensure that EROs have researched the merits of working with appropriate partners, and, if appropriate, work with them to promote electoral participation. This standard has four levels with two levels in the 'Not currently meeting the performance standard' category.

17. In order to meet the standard EROs must have consulted other local authority departments, and have evaluated the cost/benefits of a joint working arrangement. In order to be 'Above the standard', EROs should have actively engaged with other departments within the local authority and have consulted external bodies for the possibility of a joint working arrangement where appropriate.

18. This standard is important because it provides the best level of service to electors and ensures best value for money for local authorities. For example, better service can be supplied by teaming up with organisations that are already providing help and advice services in the local area – like collaborating with local youth workers or Royal National Institute for the Blind groups. Equally, better value for money can come from joint working, e.g. sharing premises for an event with a neighbouring authority, or running a joint advertising campaign on local buses. Working together and sharing information is crucial, especially as many EROs have referred to resources as being insufficient.

19. Chart C3 shows that over half the EROs in Great Britain have assessed themselves at the 'Performance standard', with 13% saying that they are 'Above the performance standard', and just under a third 'Not currently meeting the standard'.

Chart C3: Breakdown of Standard 7: Working with partners across Great Britain



20. Of those that have assessed themselves as 'Not currently meeting the standard' a small number of EROs said that they have given no consideration to working with partners, and a quarter have identified the possibility of doing so, but have not acted upon it.

21. The results are relatively evenly spread across the countries. Scotland has the highest percentage of officers at the 'Meeting the performance standard' or 'Above the standard' levels with 84%. Just under 73% of EROs in Wales said that they 'Meet the performance standard', of which 14% were above standard. Scotland had the most 'Above the standard' with 19% followed by Wales with 14% and England with 12%. However, this still equates to 44 authorities in England being above standard.

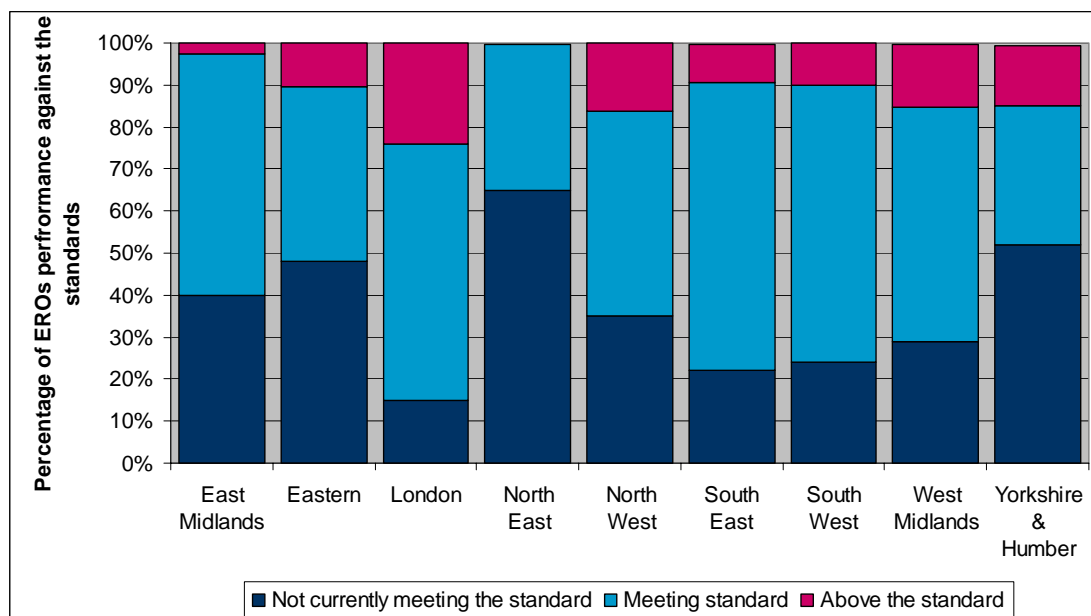
22. The narrative feedback that we received for this standard varies considerably, and in many cases evidence overlaps with *Standard 6*. The feedback shows some joint working between authorities, and various other departments, particularly in advertising. Most of this is done through internal communications teams. In addition, some officers say that they also work with council tax teams to include registration documents in their letters.

23. The verification visits for this standard highlighted a lack of documented procedures for joint working across Great Britain. In addition, there is also limited formal evaluation of joint working practices to assess their effectiveness. Some EROs said that it is difficult to evaluate the success of arrangements as these could effectively cause an increase in registration or stop a decrease and both could be seen as successes.

24. EROs in Scotland and Wales have given detailed feedback and are well organised with regards to joint working. In Scotland, this may be due to the fact that Valuation Joint Boards help forge closer links between authorities, an area that was examined in more detail in the summary report in paragraph 3.15.

25. London has highest percentage of EROs meeting the standard with just under 88%. Of these, just under a quarter said they were 'Above the standard'. London also has the lowest proportion of officers, 15%, 'Not currently meeting the standard'. London also has the highest percentage of authorities above the standard with a quarter assessing themselves at that level. The North West has the next highest number above the standard with 16%. The North East has recorded no authorities above standard and has the highest number of authorities not meeting standard with just under two-thirds in the 'Not currently meeting the standard' category.

Chart C4: Breakdown of Standard 7 by English European Parliamentary regions



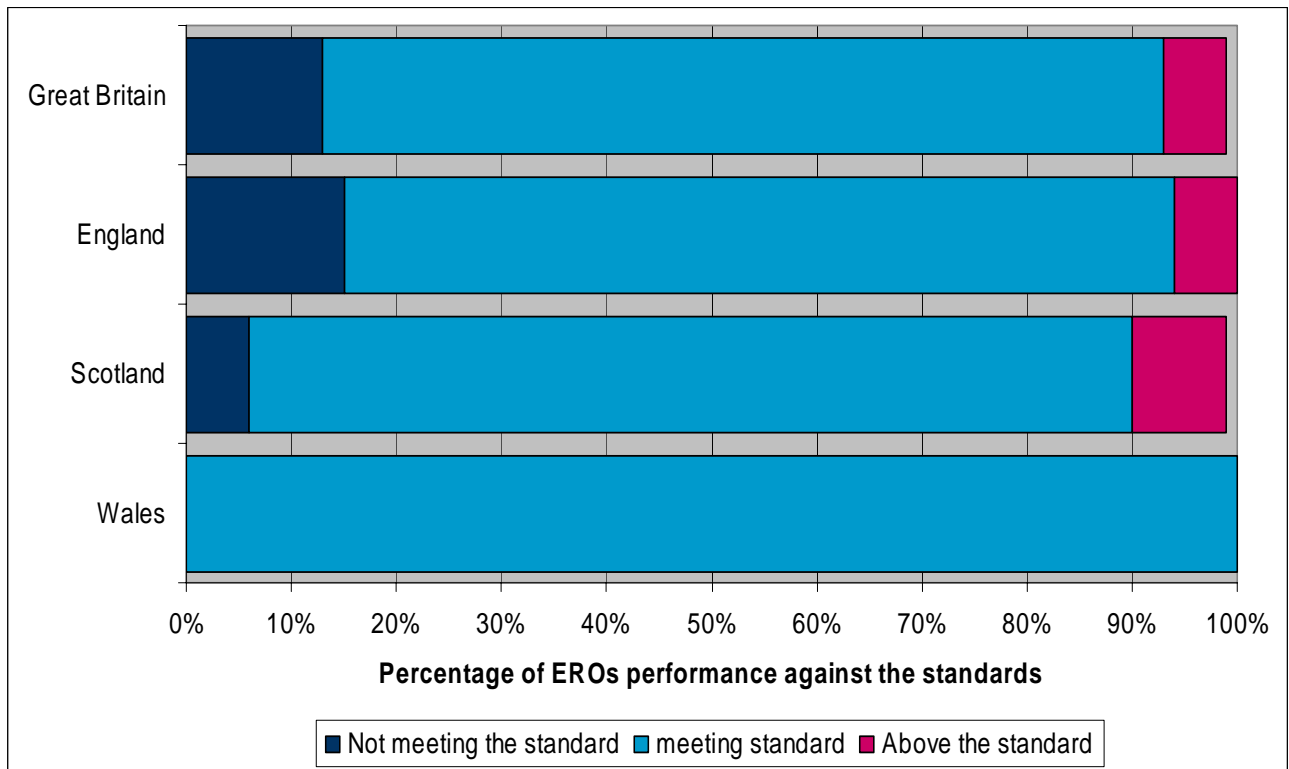
Standard 8: Accessibility and communication of information

26. This standard aims to ensure that EROs effectively communicate electoral registration information, and provide a simple and user-friendly way to access the information, to encourage registration applications. This standard has three levels. The ERO should be able to demonstrate how the appropriate languages and formats have been decided on (by taking note of

specific research and legislation) and provide details of how the most accessible method of communicating information has been decided.

27. The vast majority of EROs stated they meet this standard. There are 25 authorities, or 6% recording themselves above standard, with 54 authorities, or 13% recording below. This is shown in Chart C5.

Chart C5: Breakdown of Standard 8: Accessibility and communication of information across Great Britain



28. All but two EROs in Scotland said that they meet the standard, with one appointed by two Scottish councils below, and one appointed by three Scottish councils above the standard. All EROs in Wales said that they meet the standard. It should be recognised that Wales has a lesser need for a large variety of publications in different languages because the demand for that service is lower, although all documentation in Wales is, of course, produced bilingually. A slightly lower proportion of EROs in England said that they meet the standard – 79% with 6% assessing themselves above. England has the highest number of authorities below standard at 15%, or 52 authorities, which is slightly above the Great Britain average of 14%.

29. The majority of EROs who have marked themselves in the ‘Not currently meeting the standard’ category did so because they do not provide material in a range of languages. Some officers said that this was largely because they had no need to do so because of the demographics of the area. However, most offer forms in alternative formats upon request. The cost of translation was a common reason for not offering this service.

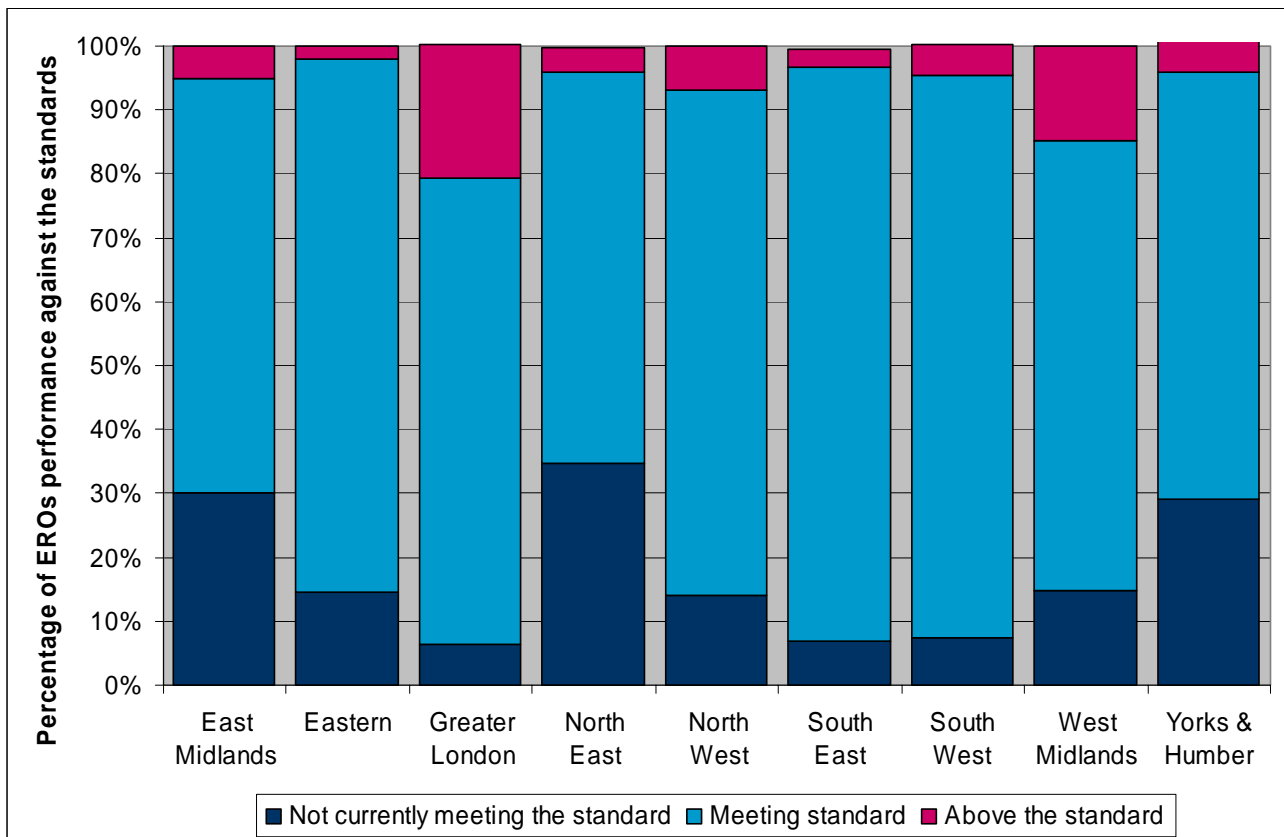


The guidance for meeting this standard requires EROs to consider the appropriate formatting of documents as well as their translation. From the narrative provided, attention has been focused primarily on the provision of documents in various languages. There is little evidence of EROs considering the need to provide Braille, audio, sizing and wording alternatives. The Do Politics website offers advice and guidance on this.

30. The verification visits have highlighted similar trends for this standard across Great Britain. Whilst a significant proportion of authorities offer at least one alternative translation of documents, there is no consideration of the need to provide documents in various formats. Furthermore, EROs regularly use internal communication teams to provide guidance on translation requirements, negating the need to carry out additional research.

31. London has the highest number of authorities 'Above the standard' with 21%, followed by the West Midlands at 15%. In keeping with the other participation standards, London has the highest number of authorities meeting or exceeding the standard, a total of just under 94%. Again, it should be noted that London has the most ethnically diverse population across all the regions, and, therefore, there will be a greater demand for this service than in other areas.

Chart C6: Breakdown of Standard 8 by English European Parliamentary regions



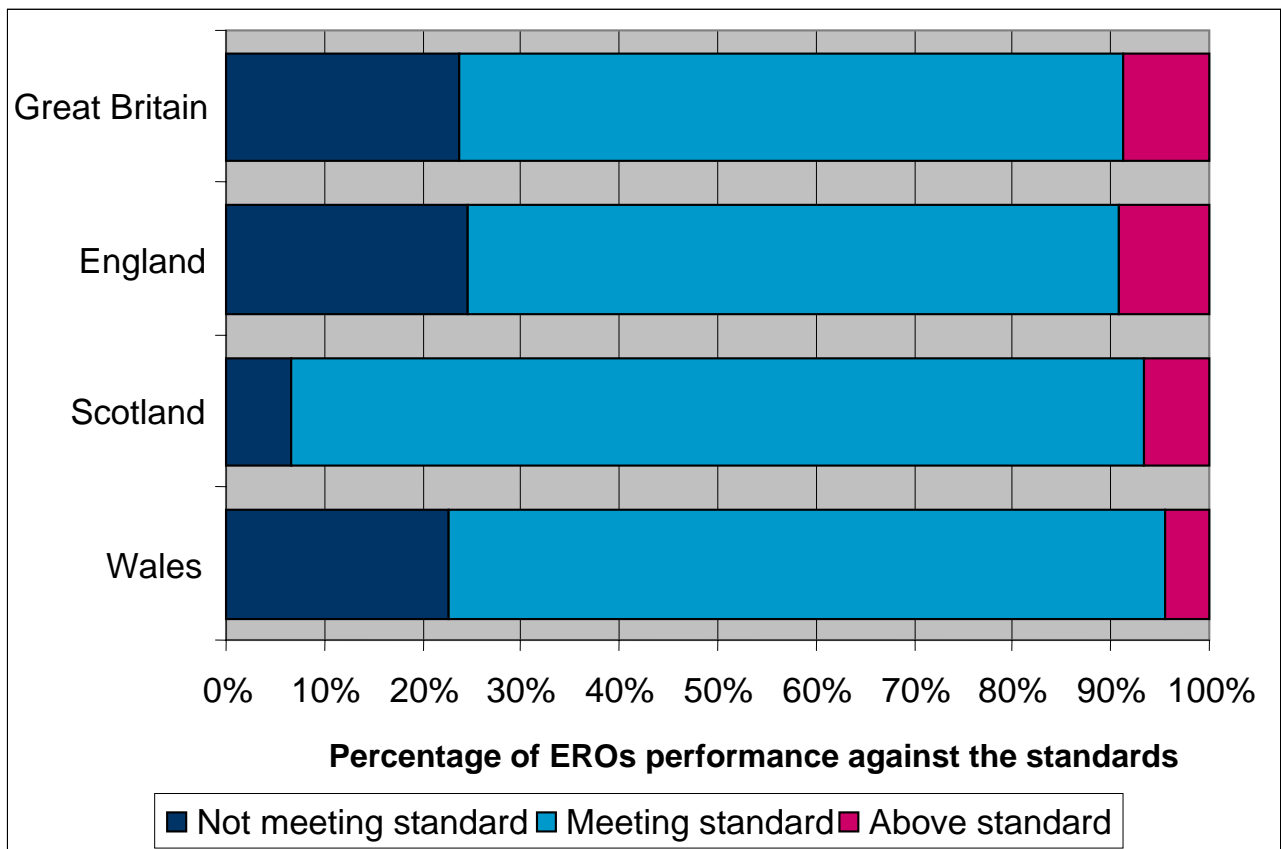
Appendix D – Planning and organisation

1. The final subject area looks at Electoral Registration Officers' (EROs') planning processes for the annual canvass and rolling registration process as well as the type of training given to staff and canvassers.
2. There are two standards in this area, which are:
 - Standard 9 – Planning for rolling registration and the annual canvass (*Planning*)
 - Standard 10 – Training
3. Both these standards require the ERO to have a written plan to be assessed at 'Performance standard'. Therefore in keeping with other areas requiring written documentation, there were a number of EROs who said they fell into the 'Not currently meeting the standard' category.
4. The majority of EROs said that they met both standards (over two-thirds) with a small number 'Above the standard'. Most officers who said that they did not meet *Standard 10: Training* also assessed themselves below *Standard 9: Planning*. However, most officers said that although they did not have a written schedule for training activities, they documented their staff's training needs through the staff appraisal system. This may explain why there is a relatively smaller proportion of officers below this standard compared to other standards requiring a written plan as a staff appraisal system was already in place, and there was no need to create a new plan.

Standard 9: Planning for rolling registration and the annual canvass

5. *Standard 9* looks at the process an ERO has in place to plan for rolling registration and the annual canvass. This standard has three levels and in order to meet the standard an ERO should have a written plan for managing rolling registration and the annual canvass. The plan should cover the following areas:
 - clearly defined objectives and success measures
 - risks – identification and mitigation
 - business continuity arrangements
 - recruitment of temporary/permanent staff where needed
 - identification of financial and other resources
 - evaluation plan recording the results of the activities undertaken
6. In order to be 'Above the standard', an ERO should also plan a specific budget for the annual canvass and rolling registration process, identify the needs of the most hard-to-reach audiences and have a fully-functional business continuity plan to cater for unforeseen circumstances and staff absences.

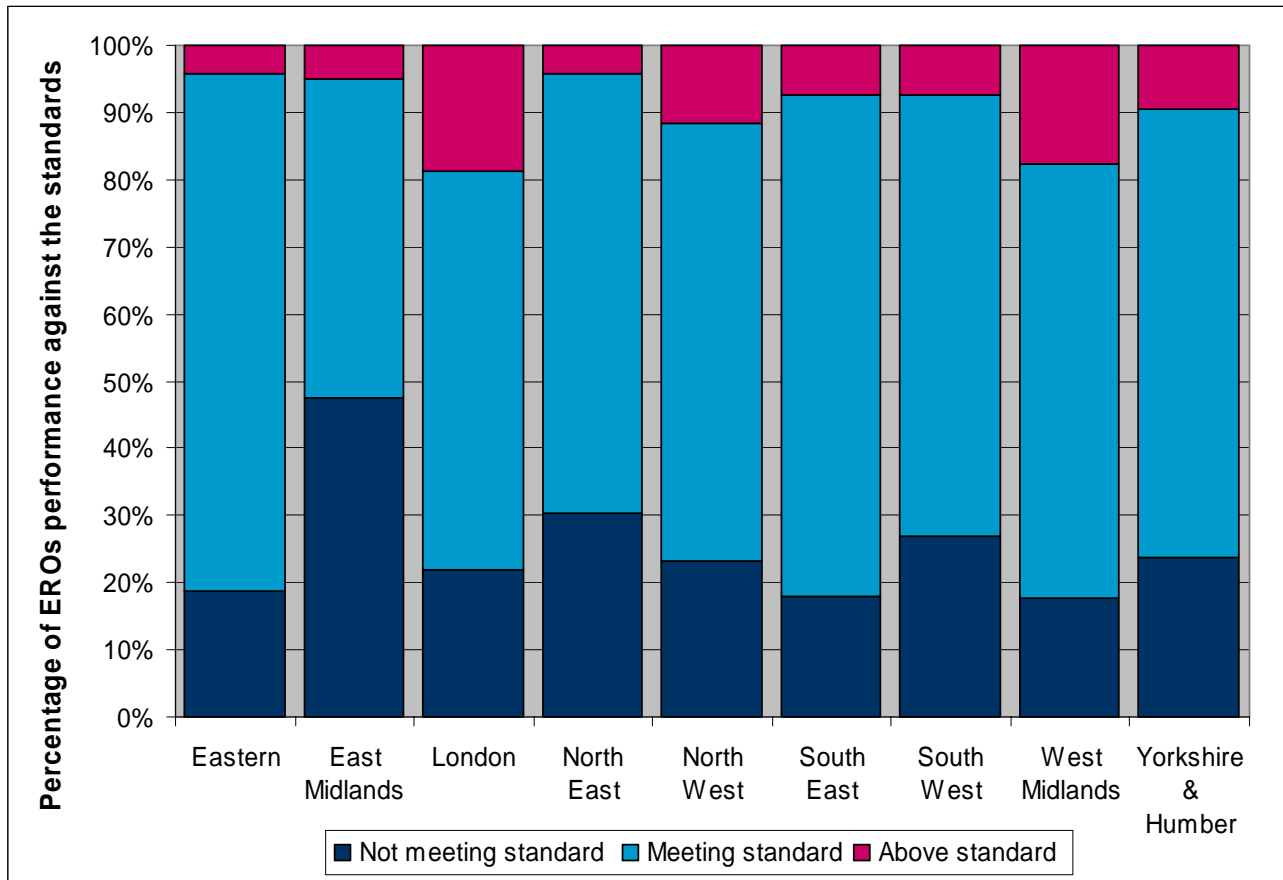
Chart D1: Breakdown of Standard 9: Planning across Great Britain



7. Just over three-quarters of EROs say that they are at or above the standard. This is roughly mirrored across England, Scotland and Wales, with a similar proportion of EROs in England and Wales assessing themselves the same way. Scotland has a slightly higher percentage, with only one officer saying that they do 'Not currently meet the standard'. Although this is consistent with the other standards requiring a written plan, more EROs seem to document a plan for the annual canvass and rolling registration process than for other areas, in particular integrity and public awareness.

8. Across the English European Parliamentary regions, on average, just over three-quarters of EROs say that they have a plan. However, as Chart D2 shows, a significant number do not. Just under a fifth of EROs in London say that in addition to a formal written plan (which in most cases is a collection of the various documents covering specific areas), they also plan a specific budget for rolling registration and the annual canvass, assess the needs of the most hard-to-reach audience and have a formal business continuity plan. We have found that the specified budgets are generally included in the ERO's overall service budget.

Chart D2: Breakdown of Standard 9 by English European Parliamentary regions



9. Just under half of EROs in the East Midlands assessed themselves below standard and most said that it was due to the lack of a plan for rolling registration. Overall, of those that assessed themselves below standard, just under a third said that they have the required plans in place, but did not feel that they satisfied the criteria for a comprehensive written plan as specified in our guidance. A large number of these officers also said that they have plans in place for the annual canvass but not for rolling registration. However, most of these also had general risk management plans and business continuity arrangements, either through the council structure or through the elections team.

Standard 10: Training

10. The final standard aims to ensure that EROs have provided appropriate training for staff to deliver the rolling registration and annual canvass processes. This applies to both permanent and temporary staff within the electoral services team and canvassers.

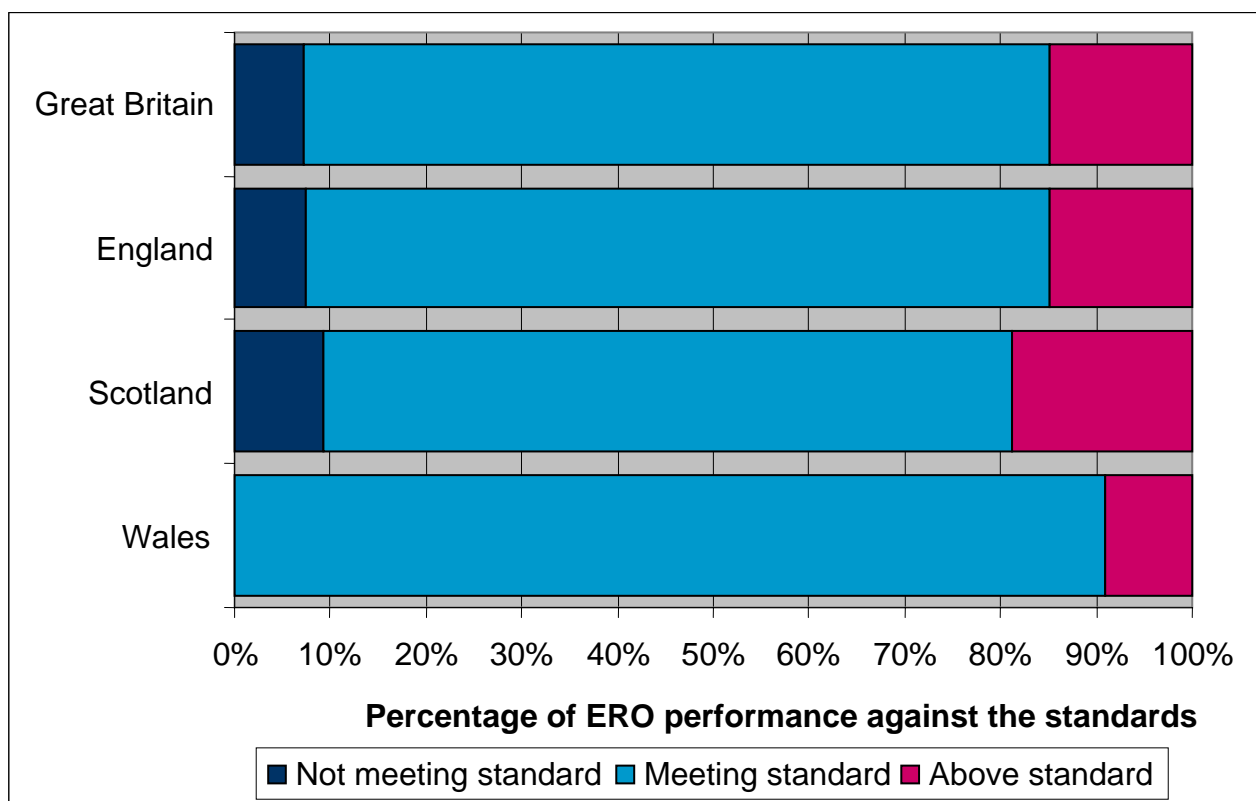
11. This standard has four levels, with two levels below the standard. The lowest level in the 'Not currently meeting the standard' category indicates that the ERO does not carry out any activities towards meeting the standard, while the second level indicates that some of the activities we would expect are

being carried out, but not sufficiently to meet the standard. For the purpose of the analysis which follows, we have used only the three categories of performance ('Not currently meeting the standard', 'Performance standard', and 'Above the performance standard'), and have not illustrated findings relating to the levels within each category.

12. In order to meet the standard, EROs should have a written schedule of training activities which is provided to both permanent and temporary staff. The schedule should cover all training for:

- permanent staff before registration events and in the event of legal change
- temporary staff working in the ERO's office
- those undertaking house-to-house enquires
- those monitoring staff undertaking house-to-house enquires
- staff providing registration information outside the ERO's office
- the Electoral Registration Officer by their staff

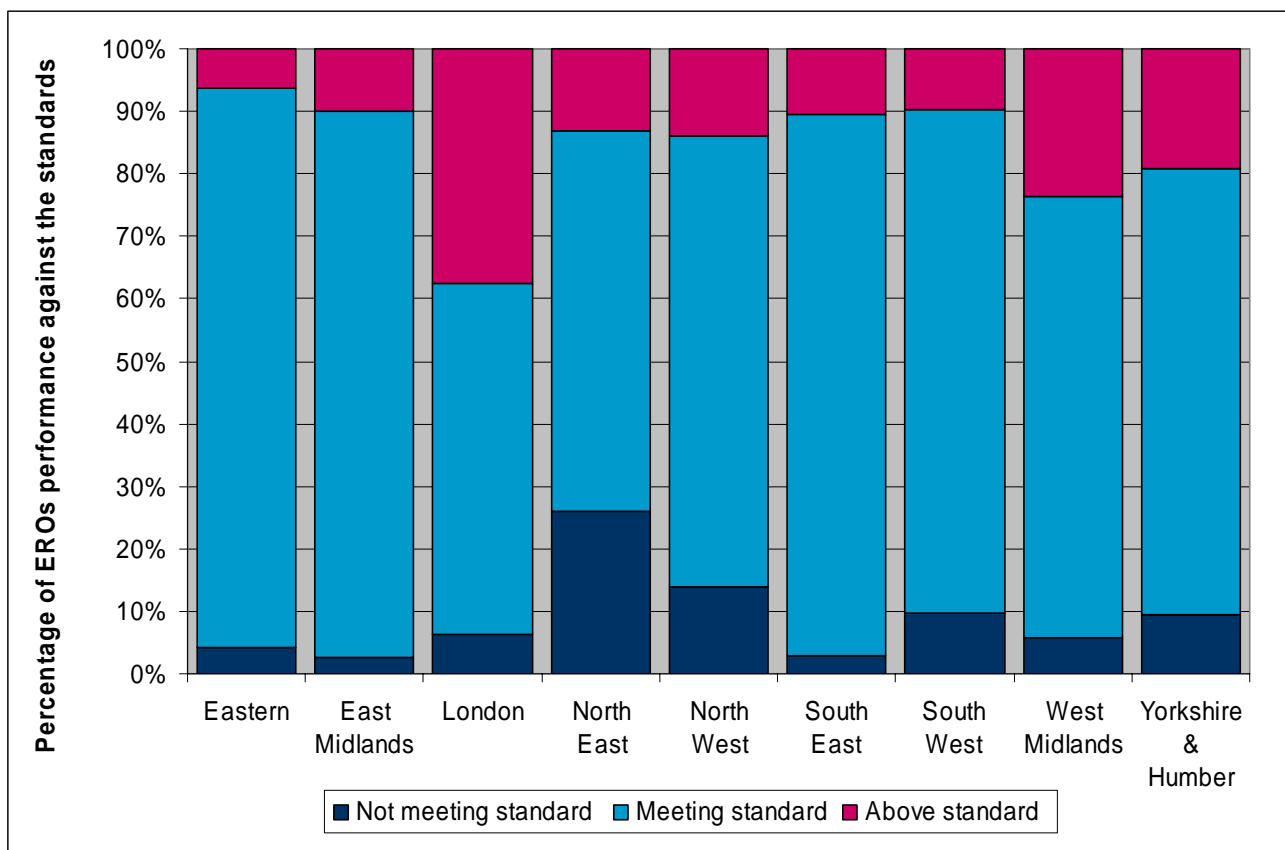
Chart D3: Breakdown of Standard 10: Training across Great Britain



13. Chart D3 shows that across Great Britain the vast majority of EROs say that they have a written schedule of training activities, meeting all the criteria listed in our guidance. In Wales, all EROs have the written schedule with two officers saying they are 'Above the standard' by evaluating the effectiveness of the plan each year.

14. A small minority (five) of EROs in England said that they do not provide training for their staff other than the basic induction process. Our analysis of the narrative boxes on the self-assessment forms and face-to-face visits with electoral services teams suggests that the primary reason for an assessment below the standard is the lack of a written schedule of training activities, rather than lack of training. Almost all EROs offer some form of basic training to their staff. However the content and depth of the training is in some cases dependent on budget.

Chart D4: Breakdown of Standard 10 by English European Parliamentary regions



15. Looking in more detail at the English Parliamentary regions, Chart D4 shows that the vast majority of EROs are either at or above standard. However, just over a quarter of officers in the North East of England have assessed themselves in the 'Not currently meeting the standard' category, with most providing only the basic relevant training for permanent members of staff.

16. Over a third of EROs in London say that they are above standard, the most across all the regions. In general, there are a number of common themes emerging from the self-assessment forms supporting an assessment above the standard. The most evident is planning a schedule of training activities through the staff appraisal or Personal Development and Review system. This method ensures that a documented record of training activities is kept and reviewed annually.

17. In addition to this, most EROs support their staff in their attendance at Association of Electoral Administrators (AEA) and Commission training events and encourage them to undertake the AEA certificate or foundation course. Another common area amongst EROs is the provision of training or guidance material to canvassers, including evaluation feedback forms to be completed by canvassers after the process has ended.

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