

Rt Hon Ed Miliband MP
Leader of the Opposition
House of Commons
London
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By Email

27 January 2015

Dear Mr Miliband,

Individual Electoral Registration

I am writing in response to your speech of 16 January 2015 about the representation of students and young people on the electoral register following the introduction of Individual Electoral Registration (IER). We have not received the letter you mentioned in your speech, but I wanted to respond to the points you raised.

The Commission and the wider electoral community share your commitment to ensuring that our electoral registers are as complete and accurate as possible, and I want to set out what we and many others are doing to help get people - including students - registered before the elections in May. We have issued a briefing today to MPs and others to update them on the position, and to encourage them to get involved in National Voter Registration Day next week on 5 February – I have attached a copy to this letter.

Student registration

This letter and our briefing sets out in some detail what is happening to get students and other groups registered. The Commission has, through our research, long identified students as a typically under-registered group and therefore recognised early on the challenges in registering them at their term-term addresses, particularly during the transition to IER. That is why, even before the introduction of IER, we published guidance and set performance standards for Electoral Registration Officers (EROs) that identified students as a particular group to target during the transition.

Putting voters first

An independent body established by Act of the UK Parliament



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A few days before you made your speech, all University Vice-Chancellors and college principals in Great Britain received a joint letter from the Electoral Commission, the National Union of Students, Universities UK, the Association of Colleges, the Association of Heads of University Administration and GuildHE, asking for their support in registering students to vote and encouraging them to run voter registration drives on campus.

The letter asked universities and colleges to take a few simple, but important actions to let their students know about the importance of registering to vote. We have received positive feedback that this has proved helpful in facilitating conversations between universities and student unions about how they can work together to get students registered. You indicated in your speech that you have also written to University Vice-Chancellors and we hope this will further highlight the importance of these efforts to get people registered in the run-up to the May polls.

The ability for everyone, including students, to now register to vote online, made possible by the introduction of IER, is also a positive development.

1 December electoral registers

It is important to emphasise, as we have in today's briefing, that the 1 December registers provide a snapshot of how the registers stand at that point. In previous years, EROs' canvass activity has been primarily focussed before this date. But a key part of the work we expect EROs to do as part of the move to IER is to continue to implement their detailed plans to target under-registered groups right up until the registration deadline - now just 12 weeks away on 20 April 2015 - in order to maximise the number of people on the register by the time of the May elections.

In particular, we have checked that EROs in areas with high student populations have plans in place to target students and we are supporting this work by providing template materials to use locally and by working with partners such as the NUS, Universities UK and others to help get the message out both to individuals and institutions. We are monitoring the implementation of these local plans and we know, for example, that a significant number of EROs in areas with large student populations have already made arrangements with institutions to share student information, which will help them to contact students and invite them to register.

It is important to be clear that the ongoing work to achieve the transition to IER means that work to identify and encourage students to register at their term-time address was by no means complete by the time of publication of the revised registers; EROs expect

that the January or February registers will provide a more accurate picture of the outcomes of their ongoing activity with students.

The Labour Party made available figures about registration levels in areas with significant student populations on the day of your speech. We agree that, in general, those figures underline the points I have made above about the need for all of us to continue to focus on students, as well as other groups less likely to be registered, right up to the registration deadline on 20 April. As you know, the Commission too is analysing the data and next month we will be publishing a report on the 1 December registers across England and Wales, with a further report in April on the data for the registers in Scotland (where the transition did not start until after the Independence Referendum). We will certainly address the question of student registration in those reports.

These reports form an important part of our work to monitor and report on the transition to IER; and we will be publishing a further report on the transition to IER in summer 2015. The Electoral Registration and Administration Act 2013 provides that the transition to IER will not conclude until December 2016. That is after the multiple elections that are currently planned to take place in May 2016: elections to the Scottish Parliament, the Welsh Assembly, the Northern Ireland Assembly, for the London Mayor and Assembly, to local authorities in England, and for Police and Crime Commissioners. As we have said, if there is a risk that voters would be removed from the register and disenfranchised, the Commission will publicly recommend that the end to the transition remains 1 December 2016. We hope that there will be significant opportunity in Parliament at that point to scrutinise our advice and to properly debate any proposed changes.

Getting people registered

A huge amount of work is happening around the UK to get people registered before the General Election and the briefing I have attached highlights some of the key activity taking place, including information about our own national public awareness campaign. It's also important to remember that anyone who is already on the household register and residing at the same address has not been removed as a result of the move to IER.

Additional funding

The Commission has welcomed the extra funding recently announced by the Government to help EROs get as many people as possible registered.

We have strongly recommended that all EROs should use the £6.8 million the Government has allocated to them to write to all households in early 2015, which will

help to address the challenges arising from the lack of a household canvass in autumn 2014. This household notification letter has a number of clear benefits, all of which can contribute to helping EROs to ensure that their registers are as accurate and complete as possible ahead of the May polls. The letter, a template for which we have already provided to EROs, is designed to:

- prompt those who have not registered yet to do so;
- help to pick up those who have recently moved within or into the registration area; and
- give residents an opportunity to check their details on the register are accurate.

We are currently providing advice and recommendations to the UK Government about how best to target the additional £2.5 million they have made available to support registration activity, to ensure that it is focussed on those groups – including students and attainers - most likely to have been affected by the change to IER, and therefore most likely to have been missing from the 1 December registers.

We have indicated that the money could best be spent in two ways:

- Wherever possible, the additional funding should be given directly to EROs, who are best placed at this stage to directly target the under registered groups in their areas through the engagement plans they already have in place.
- Some of the funding could also be used to boost planned activity that we know some organisations already have in place and who we think will be able to use any additional funding quickly and effectively. For example, we know that the NUS could use some of the funding to directly support student unions that are planning activities to get students registered. There are also organisations like Operation Black Vote and Bite the Ballot, who have national voter registration activity planned and who may be able to use additional funding to deliver activity directly targeted at under registered groups, such as Black, and Minority Ethnic and younger voters, quickly.

Support from political parties

Throughout the transition to IER the Commission has sought to keep Parliament fully updated with the work that everyone involved in electoral registration is doing to make sure that the registers remain as complete as possible. As well as giving evidence to the House of Commons Political and Constitutional Reform Committee to discuss progress with the transition to IER, we have also published reports on the transition, and issued briefings to all Parliamentarians at key stages of the process – the briefing I have attached to this letter is the most recent in that series.

The Electoral Commission

Our briefings have included a range of practical things that that MPs, Peers and councillors can do to help encourage people to register to vote, including putting a link to the online registration site on their websites.

Political parties have a real opportunity to help increase registration in the 12 weeks remaining before the registration deadline, not just through your voter canvassing but also by ensuring that parties', candidates', MPs' and councillors' websites, social media feeds, etc all carry a prominent voter-registration message directing people to the online registration service. So for example, we would encourage you to consider displaying a prominent link on the Labour Party's website and social media accounts, and encourage Labour MPs, councillors and candidates across Great Britain to do the same. We are writing this week to all Party Chairs and Chief Executives to ask them to do this too.

I hope that this is helpful and I would be happy to meet you to discuss any of the issues raised if you would find this useful. I am copying this letter to the Shadow Justice Secretary and the Shadow Constitution Minister. I am also making a copy available on our website.

Yours sincerely,



Jenny Watson
Chair