



Report on performance standards for Electoral Registration Officers in Great Britain

Third analysis of performance

April 2011

Translations and other formats

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Summary

In order to take part in an election in Great Britain, potential voters need to be registered. 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 provide this high-quality service.

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

The electoral registers compiled by EROs in autumn 2010 underpin a significant series of electoral events taking place in spring 2011: the referendum on the law-making powers of the National Assembly for Wales on 3 March; elections to the Scottish Parliament, National Assembly for Wales and Northern Ireland Assembly; the UK-wide referendum on the UK Parliamentary voting system; and local elections in parts of England and across Northern Ireland, all on 5 May.

This report is our assessment of EROs' performance in compiling those registers. This is the third year that we have assessed their performance against the standards we published in July 2008. Overall, this assessment shows a continuing improvement, compared with EROs' performance in 2008 and 2009. However, there remain 45 EROs who, in some aspects of their performance, have shown no improvement over the three years in which we have been reporting. We will meet these EROs following the spring polls and ask them to report again on their performance by the end of June. We will then publish a report on their performance in the summer. A list of EROs who have not met a performance standard on three occasions can be found in Appendix B.

The performance standards framework

As a result of the powers made available to us following the introduction of the Electoral Administration Act in 2006, we are able to ask EROs (and Returning Officers) to report on their performance against our standards. We can then make recommendations to improve their performance, most often by offering a range of support options (including tools on our Do Politics website¹ and

¹ www.dopolitics.org.uk/

additional guidance). We cannot make EROs (or Returning Officers) follow our recommendations or comply with any of our guidance.

Our standards aim to ensure that there is a consistent approach to registering voters locally across Great Britain. Given the substantial logistical exercise involved in electoral registration, the standards aim to ensure that EROs put in place clearly documented strategies, plans and methods that are followed by staff and can be evaluated and scrutinised. An introduction and background to the performance standards can be found on our website.²

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

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

We assess performance by:

- publishing this set of detailed and rigorous standards and specifying the evidence required to meet the standards
- issuing a direction to EROs to assess whether they have met the standards or not
- conducting a detailed verification and moderation of evidence from a sample of EROs across Great Britain, leading to changes in their assessments where they are not supported by evidence

The outcome is a set of assessments that we believe accurately reflects EROs' performance against the standards. The current framework has now been in place for three years and we are constantly looking at ways to refine and improve it. As such we will be working with electoral administrators in autumn 2011 to revise the framework to ensure that it remains effective and fit for purpose. We describe in more detail how we will develop our performance standards below.

² www.electoralcommission.org.uk/_data/assets/pdf_file/0019/100837/Background.pdf

Performance against the standards in Great Britain 2010

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

- Performance has improved across all four subject areas, with fewer EROs assessed as below any of our standards.
- For the third consecutive year, all EROs met at least one of the three standards in the first subject area, 'Completeness and accuracy of electoral registration records'. This year all EROs met at least two standards in this subject area.
- Ninety-seven per cent of EROs either met or exceeded all three of the standards in the first subject area, compared with just under 96% who met or exceeded all the standards in this area last year.
- A similar percentage of electors (97%) across Great Britain were served by EROs who either met or exceeded the three standards in this subject area.
- 'Participation' remains the weakest performing subject area, in particular Standard 6: 'Public awareness', where 12% (47) of EROs do not currently meet the standard. Nearly three-quarters of these EROs (34) have never met this standard (these EROs are named in paragraph 2.24). A third of these EROs in England and Wales serviced local authority areas where the Returning Officer was below the equivalent standard.
- Performance has improved for the five standards requiring a documented plan. By having a 'living' and working plan, the ERO can demonstrate that they have considered all the evidence and options open to them and have applied the best strategy for carrying out a specific task, and we are pleased to see that more EROs are now doing this. However, a lack of formal planning continues to be a concern in a small number of cases and is the primary reason why EROs are below the standards in the 'Participation' subject area.

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

We have a continuous programme of performance improvement activities that involves contacting all EROs who have fallen below certain criteria to identify the reasons for poor performance and develop the appropriate methods to improve. We have done this with both EROs and Returning Officers (following relevant elections) in each of the last three years. We now intend to record more systematically what steps EROs (and Returning Officers) have taken to improve, following our interventions. As we develop our performance standards to

become more focused on outcomes, more systematic recording of steps taken by EROs (and Returning Officers) will help us measure what impacts our interventions have had.

Developing our performance standards

The improvement currently measured by these standards relates to the processes and plans that EROs have in place. When we started this process, we were concerned that EROs did not plan sufficiently for all the tasks required for the registration process. Without effective planning processes in place, there was insufficient opportunity for national or local scrutiny or evaluation. Our primary aim has been to ensure that EROs across Great Britain have developed adequate planning documentation to take a consistent approach to planning and evaluating their activities within their local area.

After three years of measuring performance against the standards, we are now satisfied that the vast majority of EROs have documented plans in all areas of their registration activities. There is still work to be done by EROs in relation to their plans for participation activities – that is, their plans to encourage local people to register to vote – and we will be working with them to ensure that they undertake this work.

Documented plans mean that EROs' activities in maintaining and managing electoral registers and encouraging people to vote can be scrutinised and evaluated effectively, and that there is an appropriate degree of accountability. We intend now to develop our performance standards to place greater focus on the quality of the plans and how they affect the outcomes of the processes they relate to. We will ensure that the performance standards remain challenging for EROs to achieve and that we see evidence of continuing improvement.

To develop the performance standards framework further, we intend to learn from our experience in managing two referendums in 2011; that is, in Wales in March and UK-wide in May. For both referendums, the Chair of the Commission is the Chief Counting Officer (CCO). The CCO has a power of direction to local Counting Officers in the referendums (the equivalent of Returning Officers at elections). The CCO has been able to direct Counting Officers to produce referendum plans and risk registers, based on the planning templates that we have provided.

We have actively monitored the delivery of the referendums by local Counting Officers while this has been happening, rather than reporting on activities after they have occurred. With no similar power of direction in relation to electoral registration, we are unable to require EROs to plan their activities, to share their plans with us, or to provide us with real-time information against which the delivery of their plans can be monitored. We shall, however, look at the effectiveness of our referendum monitoring strategy to see what lessons can be learnt and incorporated into our framework for monitoring the performance of EROs and election Returning Officers.

The forthcoming introduction of individual electoral registration in Great Britain will provide more challenges for EROs. The development of our performance standards must take account of the practical and legal framework for the introduction of individual electoral registration. We expect the framework to become clearer, as the UK Government develops its proposals further, later in 2011.

We shall consult formally on revised performance standards in autumn 2011.

1 Performance standards for Electoral Registration Officers

1.1 On 3 September 2010, we issued circular EC20 (2010) directing Electoral Registration Officers (EROs) to report on their performance against the 10 performance standards using the guidance and templates published in October 2009. Table 1 shows the 10 current performance standards for EROs.

Table 1: Performance standards for EROs in Great Britain

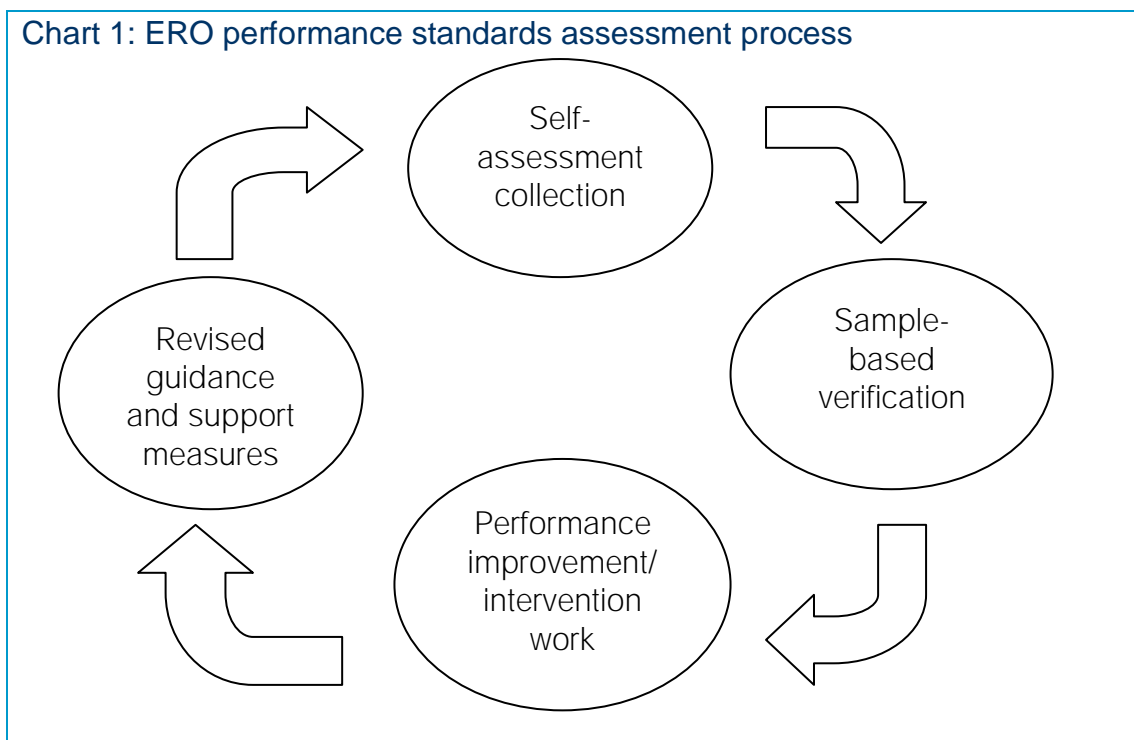
Subject area	Performance standards
Completeness and accuracy of electoral registration records	1: Using information sources to verify entries on the register of electors and identify potential new electors (referred to in the following charts and text as 'Information sources')
	2: Maintaining the property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

1.2 The deadline for submitting the performance assessments was 17 December 2010, two weeks after the conclusion of the annual canvass and the publication of new electoral registers by 1 December 2010. As in the previous two years, we again received assessments from all 379 EROs in Great Britain, ensuring that our analysis could be based on a complete set of information.

1.3 Full information about the performance of individual EROs is available on our website, where anyone can review performance against the standards, which are in an accessible chart-based format. This tool also enables comparison of performance with officers for other local authorities, and comparison with performance last year. This information can be found on our website at www.electoralcommission.org.uk/performance-standards.

Verification of assessments

1.4 Chart 1 outlines the current process for verifying the assessment of performance standards for EROs.



1.5 This year we adopted a slightly different approach to the verification of returns by carrying out 'live verification' while the annual canvass was taking place. Previously we had carried out our verification work on a sample of EROs once the returns had been received. This time we were able to observe the plans and processes used by the EROs during the annual canvass, to build a picture of activities while they were happening. We then made follow-up enquiries after the returns were received to ensure the accuracy of the information that we had received and compiled.

1.6 In total, we visited 10% of EROs from each region during the annual canvass to scrutinise their plans and processes. This was done by visits to interview electoral services managers and EROs. We looked at how each ERO had assessed their performance against the standards in 2009 and discussed how they expected to assess their performance in 2010. We found that in the majority of cases they were able to demonstrate an improved understanding of what we are looking for in high-quality electoral registration services.

1.7 In addition we also observed some canvasser training and staff briefing sessions. 'Live verification' enabled us to assess more accurately whether final performance standards returns had been completed consistently across Great Britain and enabled us to moderate the returns more effectively.

1.8 After collecting the performance returns, we made a small number of follow-up enquiries where inconsistencies were found in the returns, either following our verification during the annual canvass or based on the previous year's performance.

1.9 We have received feedback from both our internal auditors and the National Audit Office on our verification process. The majority of their recommendations have already been incorporated within our verification framework. We will now implement the remaining recommendations. For example, we intend to record more systematically at regional level what steps EROs (and Returning Officers) have taken to improve, following our interventions. More systematic recording of steps taken by EROs (and Returning Officers) will help us measure what impacts our interventions have had.

Using this performance information

1.10 The information that we collect is analysed to see where performance can be improved, and we aim to help support EROs in doing this. Specifically, our performance improvement work is carried out with EROs and electoral services managers who fall under the following categories:

- An ERO has reported being below one or more of the three standards in the 'Completeness and accuracy' subject area, particularly if this has happened in each of the previous three years. Ten EROs did not meet at least one of the three standards in this subject area in 2010, which was a reduction from 20 in 2009 and 58 in 2008. However, five of these EROs (Barnsley, Brentwood, Epping Forest, Hyndburn and Nottingham) have now fallen into this category in all three years.
- An ERO fails three or more of the planning standards (Standard 3: 'House-to-house', Standard 4: 'Integrity', Standard 6: 'Public awareness', Standard 9: 'Planning' and Standard 10: 'Training'). In 2010, four EROs failed in this area (East Hertfordshire, Hertsmere, Eden and Christchurch), down from 14 the year before.
- An ERO has not met five or more standards. In 2010 there were only two EROs below five standards (Christchurch and East Hertfordshire). In 2009, there were seven EROs in this category, down from 41 in 2008.
- An ERO has not met any one standard for three years in succession.

1.11 In some cases, we have also looked at the performance of Returning Officers (ROs) in England and Wales where there is some overlap in standards. This comparison cannot always be made in Scotland, where the ERO and RO functions are separate in the majority of cases, whereas in England and Wales the ERO and RO are usually the same person.

1.12 Since 2009 we have worked with the EROs who fell into the categories outlined above to improve their plans and processes. It is clear that the majority of officers now meet all of our standards. There remains a small minority who are not performing as well as they should. In these instances we approached

individual EROs, and in some cases groups of EROs (in areas which were close together), who were not meeting standards in the two subject areas with the poorest performance; that is, 'Integrity' and 'Participation'. We helped them develop better plans to monitor their work more effectively. As a result of our intervention, we have seen a greater understanding of the requirements needed to meet the standards and a greater level of planning at a local level.

1.13 The forthcoming introduction of individual electoral registration in Great Britain will provide more challenges for EROs. We will review our performance standards when the practical and legal framework for collecting personal identifiers has become clearer later in 2011.

2 Summary of performance across Great Britain

2.1 The overall performance of Electoral Registration Officers (EROs) in Great Britain is illustrated in Chart 2, which shows the proportion of officers who meet each standard. Table 2 shows the percentage change at each level from last year's assessment of ERO performance published in 2010.

Chart 2: Performance of EROs in Great Britain in 2010

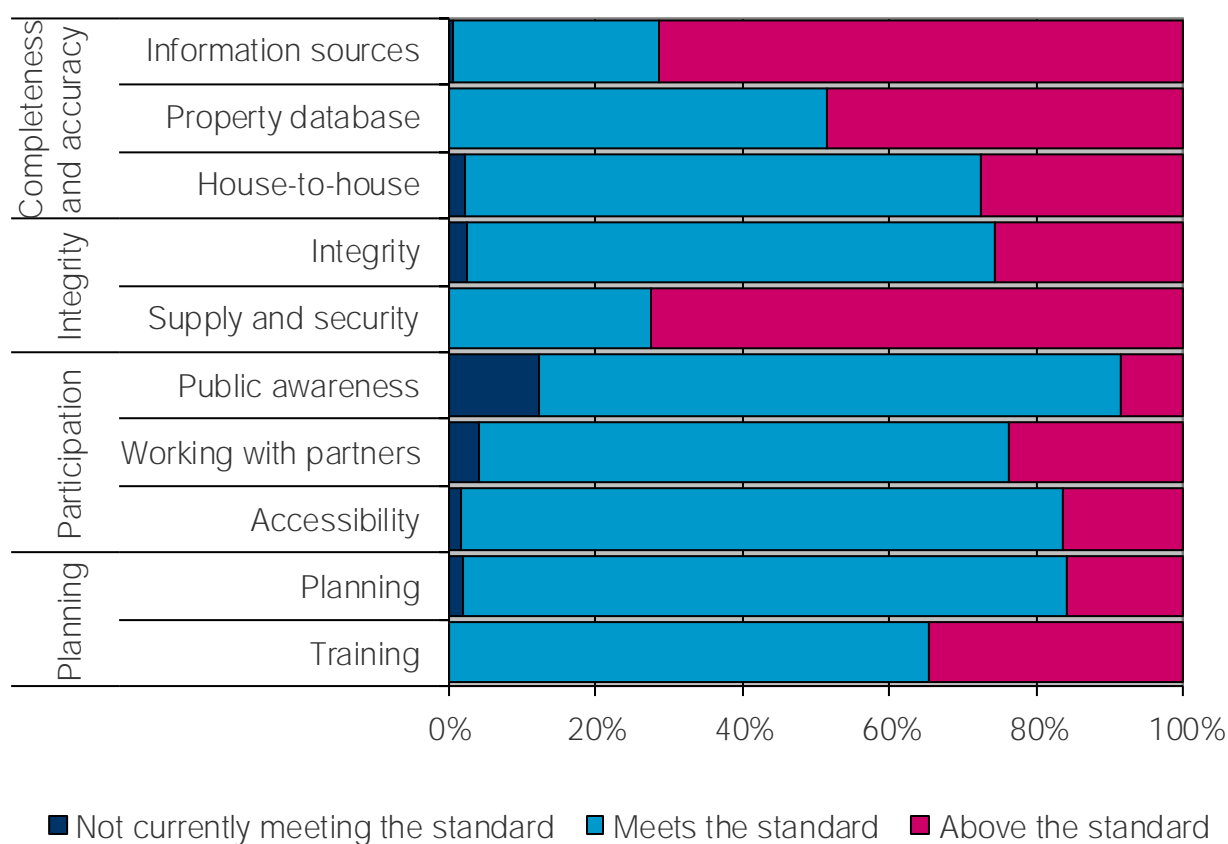


Table 2: Percentage change in ERO performance from 2009 to 2010³

		Not currently meeting the standard	Meets the standard	Above the standard
Completeness and accuracy	1: Information sources	-0.3%	-10.1%	10.4%
	2: Property database	0.0%	-6.8%	6.8%
	3: House-to-house	-2.4%	-3.4%	5.8%
Integrity	4: Integrity	-12.7%	1.6%	11.1%
	5: Supply and security	0.0%	-7.7%	7.7%
Participation	6: Public awareness	-28.5%	28.0%	0.5%
	7: Working with partners	-9.3%	2.9%	6.4%
	8: Accessibility	-4.2%	0.8%	3.5%
Planning and organisation	9: Planning	-6.6%	3.9%	2.7%
	10: Training	-1.8%	-8.0%	9.8%

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

- There has again been an improvement in performance across all 10 standards from 2009 to 2010.
- More than nine out of 10 (97%) EROs in Great Britain met or exceeded all three standards in the first subject area, 'Completeness and accuracy of electoral registration records'. No ERO was below all three of these standards.
- Nearly three-quarters of EROs reported performing above Standard 1: 'Information sources', with only two officers (Nottingham and Barnsley) below the standard.
- Five EROs (Barnsley, Nottingham, Brentwood, Epping Forest and Hyndburn) did not meet one of the three standards in this subject area in each of the last three years.
- For the third consecutive year, performance was weakest in the 'Participation' subject area, in particular Standard 6: 'Public awareness', where 12% (47) of EROs were below the standard. This is a reduction from 155 EROs last year. However, 34 of these EROs have not met this standard in all three years we have collected the data. These EROs are detailed in paragraph 2.24.
- There has been a further improvement in performance for the five standards requiring a documented plan. More officers now have a project

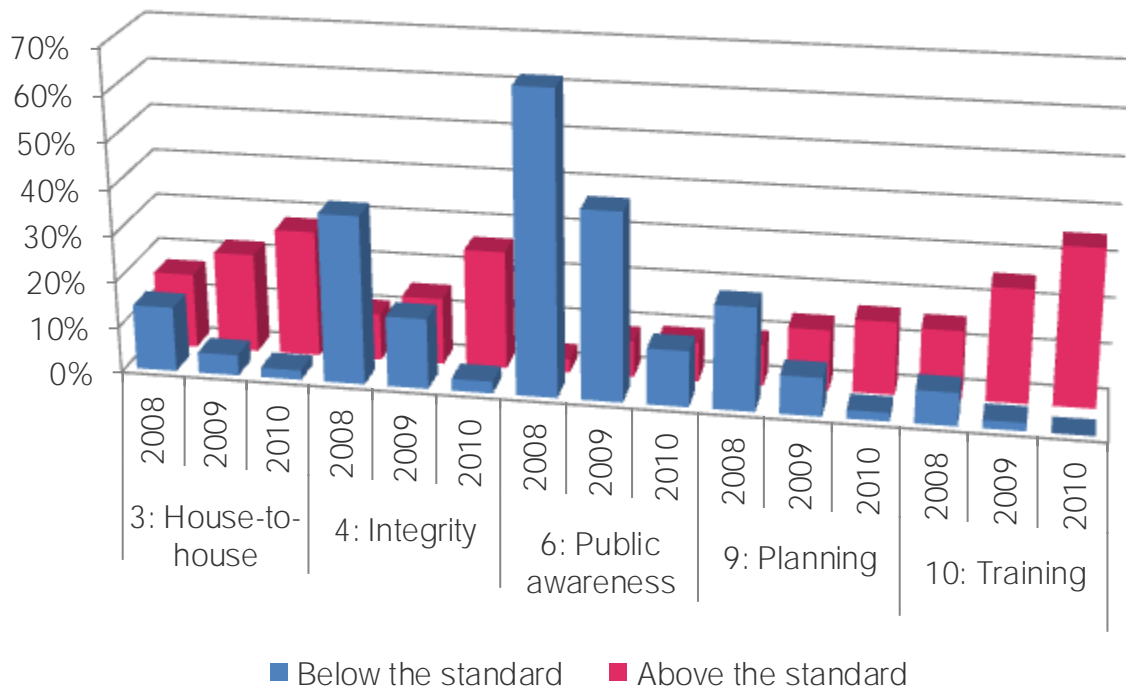
³ A negative number in Table 2 indicates a reduction in the number of EROs at that level. In the case of 'Not currently meeting the standard', a negative percentage represents an improvement.

plan for electoral registration, but in future we will be scrutinising the quality of the plans.

- As in 2009, no ERO reported being below Standard 2: 'Property database' or Standard 5: 'Supply and security'. Additionally, this year all EROs also met or exceeded Standard 10: 'Training'.
- Performance was again strongest in the 'Planning and organisation' subject area, with only seven officers across Great Britain not meeting both standards.
- The two areas which still require improvement are Standard 3: 'House-to-house' and Standard 6: 'Public awareness'. In both these areas, legal requirements apply to EROs' activities.
- In all cases where an ERO has not met a particular standard on three occasions, we will meet the ERO after the spring polls and ask them to report again on their performance by the end of June. We will then publish a further report on their performance in the summer. A list of those EROs can be found in Appendix B.

2.3 Chart 3 shows a comparison of performance of EROs across Great Britain between 2008 and 2010 against the standards that require a documented plan to be in place in order to be assessed as meeting the performance standard.

Chart 3: Comparison of performance of EROs in Great Britain against the standards that require a written plan between 2008, 2009 and 2010



2.4 Chart 3 shows that there has been a decrease in the proportion of EROs reporting performance below any of the five standards requiring a written plan, while also showing an increase in those exceeding the same standard. We have found that there has been an increase in the numbers of EROs documenting their plans, and our verification work found that, specifically in Scotland, EROs have moved to a comprehensive project plan instead of keeping a variety of different documents.

2.5 By having a 'living' and working plan, the ERO can demonstrate that they have considered all the evidence and options open to them, have applied the best strategy for carrying out a specific task, and have evaluated the merits of this, where necessary. We are pleased to see that more EROs are now doing this. However, in a small number of cases, especially in reference to public awareness activity, a lack of formal planning continues to be a concern.

2.6 Over the three years that EROs (and Returning Officers) have been reporting on their performance, we have had the opportunity to scrutinise evidence and discuss performance with nearly three-quarters of them. We have found that discussing the guidance and expectations face to face has had the biggest impact on the EROs' understanding of, and engagement with, the process. In addition, the improvement work we did in 2010 took place in the months leading up to the UK general election, and this may also have had an immediate impact on the improvements shown in performance against the standards for Returning Officers.

2.7 We have found evidence of more formal planning processes but not significant use of the plans and templates that we have provided. Some EROs have been more willing to use a plan from a neighbouring ERO as an example they can work from. We have been disappointed to see the lack of a full 'project plan' approach – with a cover sheet setting out the overall strategy, objectives, success measures and evaluation – that meets the criteria outlined in our guidance.

2.8 Although we are now satisfied that the vast majority of EROs are documenting their planning processes for the registration activities, there is more work to be done to ensure that the plans are comprehensive enough to satisfy the criteria we have established. For this reason, the next stage of developing our performance standards framework will include a move towards scrutiny of the quality of the plans and a more outcome-focused approach to planning.

2.9 Comparing electoral registration with elections, nearly 90% of Returning Officers met the relevant standards requiring plans after the UK general election in 2010. For the referendums being held in Wales in March and UK-wide in May, we have taken a different approach to performance monitoring. For both referendums, the Chair of the Commission is the Chief Counting Officer (CCO). The CCO has a power to direct local Counting Officers in the referendums (the equivalent of Returning Officers at elections). The CCO has exercised this power by directing Counting Officers to produce plans and risk registers for the

referendum, based on the planning templates and guidance that we have provided.

2.10 We are actively monitoring the delivery of the referendums by local Counting Officers while this has been happening, rather than reporting on activities after they have occurred. We have published comprehensive guidance and planning templates for Counting Officers to use and return to us well in advance of the relevant electoral events. Although we have the power to direct EROs to report on their performance against the standards, we are currently unable to ask them to follow our specific instructions when planning their activities for the referendum.

Completeness and accuracy of electoral registration records

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

2.12 In terms of the processes that EROs adopt to ensure the completeness and accuracy of electoral registers, this year's performance has built on the improvements that were made in 2009:

- Nearly all EROs (369 out of 379) met or exceeded all three standards in this subject area. This is a slight improvement on the just under 96% (359) at this level last year.
- All but two EROs (Barnsley and Nottingham) met or exceeded Standard 1: 'Information sources' and nearly three-quarters performed above the standard. Both these EROs have been below this standard for the past three years and we will be working with them to review their performance. We will highlight any area in which they believe they are still failing to improve.
- As in 2009, all EROs met Standard 2: 'Property database' and nearly half were above the standard.
- A total of eight EROs did not meet Standard 3: 'House-to-house'. Seventeen EROs were below the standard last year. Three of the EROs (Brentwood, Epping Forest and Hyndburn) have not met this standard for the last three years. We have previously contacted all three local authorities and we will again be working with the relevant EROs to improve their level of performance.

2.13 Some EROs said that, although they did not meet Standard 3: 'House-to-house', they are confident that they carry out the annual canvass in accordance with the legislation and guidelines, but there is no comprehensive documented plan in place. Our verification of returns across Great Britain echoed these comments and found that in the few times where EROs did not meet the

standard, the evidence of documented plans was lacking or only a canvass activity timetable or task list was included.

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

2.15 Section 9A of the Representation of the People Act 1983 places a duty on EROs to take all steps necessary to maintain the electoral register, including making house-to-house enquiries on one or more occasions to ensure that the residents present are correctly included on the register. EROs must be able to demonstrate that all necessary steps have been taken for properties in their area.

2.16 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.

2.17 In the past we identified a lack of understanding of the full extent of the obligation to contact every non-responder, but our verification work found that this has improved, although there is still evidence of a lack of formal planning. EROs have provided us with the supporting documentation (canvasser record sheets/maps and lists of properties) but not an overarching formal plan. Another reason identified for not carrying out a check on all properties was the cost or difficulty of recruiting and retaining canvassers. There were instances of canvassers pulling out at short notice, and there not being enough time to find replacements.

2.18 We have written to all the EROs who did not meet this standard to remind them of their responsibilities and will be looking to discuss this issue with them again.

Integrity

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

- Nearly all EROs (97%) currently meet or exceed Standard 4: 'Integrity', with 10 reporting performance below the standard. Although this is a great improvement from 2009 (50 EROs below the standard), six EROs (Barnsley, Christchurch, East Hertfordshire, Norwich, Sutton and Windsor & Maidenhead) have never met this standard.

- As in 2009, no EROs were below Standard 5: ‘Supply and security’ (compared with three EROs who were below this standard in 2008), and just under three-quarters (73%) were above the standard, the highest number across all 10 standards.

2.20 Out of all 10 standards, Standard 4: ‘Integrity’ has shown the greatest improvement in terms of the reduction in officers below the standard (from 50 down to 10). Of those who reported being below the standard this year, six were also below the standard in 2008 and 2009. As we found in the previous year, most EROs who do not currently meet the standard said that they have contact with their police single point of contact (SPOC) and that they keep registration forms for the life of the register and absent vote applications until the application is cancelled. However, in common with other standards which require evidence of planning processes, many fail to meet this standard because of the absence of a documented plan.

2.21 All EROs met or exceeded Standard 5: ‘Supply and security’, with just under three-quarters of EROs (73%) exceeding this standard, making it the area with the highest performance of the 10 standards. This was an improvement from 2009, where just under two-thirds (63%) reported being above the standard.

Participation

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

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

- For the third year running ‘Participation’ was the subject area where the poorest performance was demonstrated. However, there have been some noticeable improvements from last year, with only Christchurch failing all three ‘Participation’ standards. This is an improvement on 11 and 43 EROs not meeting all three standards in 2009 and 2008 respectively.
- Just under 90% met or exceeded Standard 6: ‘Public awareness’, with only 47 EROs below the standard, which is an improvement from 155 last year. Although that represents the greatest improvement across all 10 standards, performance at Standard 6 remains poorer than at any other.
- A similar percentage of the electorate was served by an ERO who met or exceeded all three standards.
- Ninety-six per cent of EROs met or exceeded Standard 7: ‘Working with partners’, with only 16 EROs below the standard.
- Ninety-eight per cent of EROs met or exceeded Standard 8: ‘Accessibility’, compared with 95% last year and 86% in 2008.

2.24 Just over 12% (47) of EROs across Great Britain were below Standard 6: ‘Public awareness’, the highest percentage at this level across all 10 standards. This standard requires evidence of a public awareness strategy to improve participation in electoral registration, and again the absence of a documented plan meant that many were below the standard. Nearly three-quarters of these EROs (34) have never met this standard (these are detailed below).

Table 3: EROs who have never met Standard 6: ‘Public awareness’

Adur	Dacorum	Maldon
Ashford	East Hertfordshire	Middlesbrough
Boston	East Lindsey	Milton Keynes
Broxtowe	Eastbourne	North Lincolnshire
Cannock Chase	Eden	Norwich
Ceredigion	Flintshire	Portsmouth
Cherwell	Halton	Rugby
Chiltern	Hambleton	Solihull
Christchurch	Harrogate	Spelthorne
Corby	Isle of Anglesey	Sutton
Craven	Kingston upon Hull	Uttlesford
		Worthing

2.25 As previously outlined, we will be contacting these EROs to arrange a meeting immediately following the spring polls in May. We will discuss with them how they can improve on their performance and the action that they are going to take. We will ask them to report on their performance by the end of June and we will publish a further report on their performance in the summer.

2.26 The last year has seen a further improvement in public awareness activity by EROs, although this is still the weakest performing standard. We have worked with EROs, making them aware of the resources we already have available and providing them with our planning templates.

2.27 We have found more evidence that EROs are putting formal written plans in place for public awareness; however, our verification work has shown that these documents are still not as detailed as we would expect and indicates that this area of activity does not receive as much attention as other electoral registration activities. However, more EROs can now produce a plan for their public awareness activities than in previous years. Our Do Politics website,⁴ which was designed to provide support and guidance tools for ERO participation activities, has a large collection of resources designed to help EROs carry out their public awareness duties as well as ideas and case studies for communication strategies.

⁴ www.dopolitics.org.uk/

2.28 Compared with Standard 6: 'Public awareness', more EROs met Standard 7: 'Working with partners' and Standard 8: 'Accessibility'. Just under 96% of EROs (363) met or exceeded Standard 7, an increase of nine percentage points on last year, which shows that more EROs are working with partners. Most of this work is with other experts within the local authority, for example the marketing team; however, some EROs have been able to evidence very good work with external partners such as neighbouring local authorities and voluntary and community sector organisations. We would now like to see more initiatives with external partners and we will refine and develop this standard to ensure that it remains challenging to achieve.

2.29 Six EROs (Broxtowe, Christchurch, Redbridge, Sutton, Uttlesford and Hambleton) were all below Standard 8: 'Accessibility'. All but Broxtowe and Redbridge did not meet this standard in 2009. In addition, all but Redbridge and Uttlesford did not meet the equivalent standard for Returning Officers following the 2010 general election.

Planning and organisation

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

- All but seven EROs met or exceeded both standards in this subject area. No ERO was below both standards, compared with four in 2009 and 19 in 2008.
- A total of 372 EROs met or exceeded Standard 9: 'Planning'. This was up from 346 (91%) last year.
- All 379 EROs met or exceeded Standard 10: 'Training', again an improvement from 372 (98%) last year.

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

2.32 Standard 9: 'Planning' had the highest proportion of officers reporting that they met the standard (over 80%) across all 10 standards, suggesting that officers are more likely to have a documented plan for the annual canvass and rolling registration process than plans for other areas, in particular Standard 4: 'Integrity' and Standard 6: 'Public awareness'. This was an increase of four percentage points from last year.

2.33 However, although the number of EROs who did not meet this standard decreased substantially from 32 last year to seven this year, four of those (Boston, East Hertfordshire, Maldon and Christchurch) also did not meet the standard last year.

2.34 Our verification work identified that there were three reasons for failing to meet the standard, namely:

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

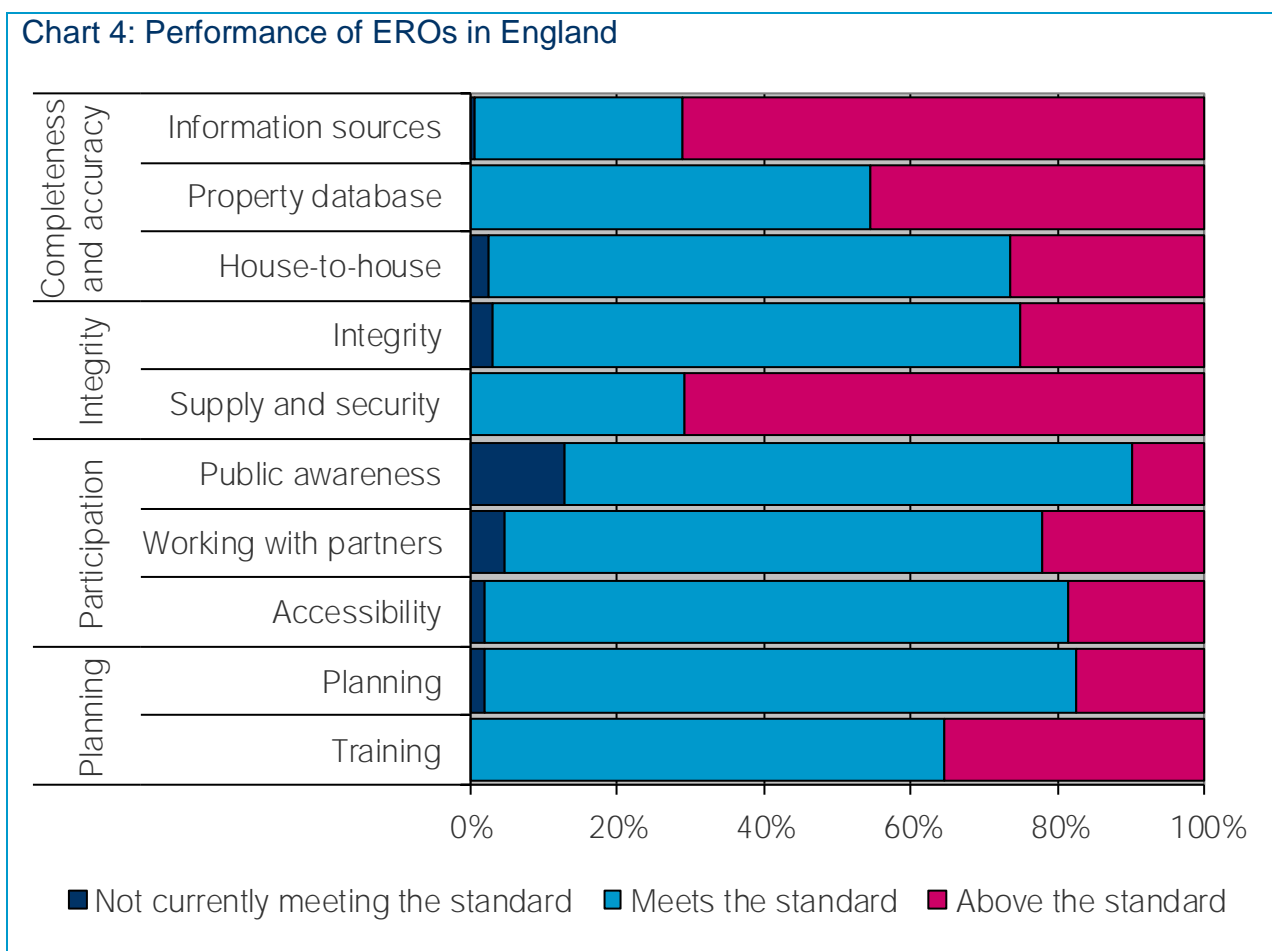
2.35 All EROs across Great Britain either met or exceeded Standard 10: 'Training', with two-thirds meeting the standard and the remainder reporting performance above the standard. All EROs offer some form of basic training to their staff, as part of their local authority staff development schemes. In some cases, staff said that they relied on training from the Association of Electoral Administrators and training materials and guidance provided by the Commission, but had not documented it. There was a 10 percentage point increase in those EROs reporting performance above the standard, meaning that they evaluated their schedule of training activities.

3 Performance in England, Scotland and Wales

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

England

3.2 Performance against the standards by the 325 EROs in England is shown in Chart 4 below. The results for England are broadly similar to performance across Great Britain, which would be expected given the greater number of EROs in England compared with Scotland (15, serving 32 local authorities) and Wales (22).



- All but 10 EROs met or exceeded all three standards in the ‘Completeness and accuracy’ subject area.
- Only two EROs in England did not meet Standard 1: ‘Information sources’, with eight falling below Standard 3: ‘House-to-house’.
- All EROs in England met or exceeded Standard 2: ‘Property database’, Standard 5: ‘Supply and security’ and Standard 10: ‘Training’.
- Thirteen per cent of EROs in England did not meet Standard 6: ‘Public awareness’ (42 in total), the most at this level across all 10 standards but a significant improvement from 2009. Just under 10% of officers reported that they exceeded the standard, the lowest proportion at this level across all 10 standards.

3.3 Local authorities in England are classified according to a number of different authority types, including metropolitan districts, unitary authorities, London boroughs and district councils. (In Scotland and Wales, all local authorities are unitary.) There are some variations in the performance of EROs in different types of authority in England. Of the two EROs falling below Standard 1: ‘Information sources’, one was a unitary authority (Nottingham) and one was a metropolitan district (Barnsley). No local authorities in England were below Standard 2: ‘Property database’. For Standard 3: ‘House-to-house’, all eight of the EROs in England who were below the standard were district councils.

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

Completeness and accuracy of electoral registration records

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

3.6 Eighty per cent of EROs in metropolitan districts exceeded Standard 1: ‘Information sources’, the highest proportion for that standard. Over two-thirds of EROs in London boroughs, unitary authorities and district councils also exceeded this standard.

3.7 Over half of EROs in metropolitan districts and London boroughs exceeded Standard 2: ‘Property database’, while the relative proportions in district councils (43%) and unitary councils (46%) were slightly lower. Performance against this standard was strong across Great Britain, with no EROs below this standard.

3.8 Seventy-one per cent of EROs across England met Standard 3: 'House-to-house'. Metropolitan districts and London boroughs were slightly more likely to exceed this standard, with no EROs below the standard. All eight of the EROs below this standard were district councils.

Integrity

3.9 Although performance against Standard 5: 'Supply and security' was consistently strong among EROs from all types of authority in England, there were more significant variations in relation to Standard 4: 'Integrity'. EROs from district councils were more likely to be below Standard 4 (seven EROs) compared with London boroughs, metropolitan districts and unitary authorities, which each had one ERO below the standard.

Participation

3.10 As in the previous year, there was again some variation in performance by EROs in different types of local authority in England in relation to the three standards concerned with activities promoting participation in electoral registration.

3.11 Unitary authorities and district councils had the highest number of EROs not meeting Standard 6: 'Public awareness' (both 15%), which is slightly higher than the average across Great Britain (12%). In London boroughs, 9% of EROs were below this standard, while the authority type with the lowest number of EROs not meeting the standard was metropolitan districts with 3% below.

3.12 A similar pattern was reflected for Standard 7: 'Working with partners'. The authority type with the most EROs not meeting the standard was unitary authorities, where 9% were below the standard compared with the GB average of 4%. Just 4% of district councils and 3% of London boroughs were below this standard and no metropolitan districts failed to meet the standard.

3.13 The pattern is not continued at Standard 8: 'Accessibility', with 6% of London boroughs below the standard, which is higher than the average for Great Britain (2%). Two per cent of district councils were also below this standard. No unitary authorities or metropolitan districts were below the standard this year. However, when it comes to exceeding the standard, London boroughs were more likely to exceed than other types of local authority, with 27% of EROs exceeding this standard compared with 17% in metropolitan districts, 17% in unitary authorities and 18% in district councils.

3.14 Across Great Britain we have done a great deal of work with EROs on participation and public awareness. For example, in March 2010 we wrote to all EROs in London who did not previously meet one or more of the standards in this subject area. We provided them with our participation improvement pack and planning templates, as well as offering continued support and meetings if needed. Two EROs requested meetings and both now meet all standards. As a

result, there are now just three EROs in London who do not meet one or more of the standards in this subject area.

Planning and organisation

3.15 Performance is fairly consistent across the two standards in 'Planning and organisation', with EROs showing improvement across this subject area. Overall, the performance of EROs in England was strong, with over 97% of EROs saying they either met or exceeded both standards. This was broadly in line with performance across Great Britain.

3.16 All six of the EROs in England below Standard 9: 'Planning' were from district councils. Metropolitan districts had the most EROs above the standard with 33%, followed by London boroughs on 24%, and unitary authorities and district councils on 15% each.

3.17 No EROs in England were below Standard 10: 'Training'. Sixty-seven per cent of London boroughs exceeded this standard, followed by metropolitan districts on 47%, and unitary authorities and district councils with 30% above the standard.

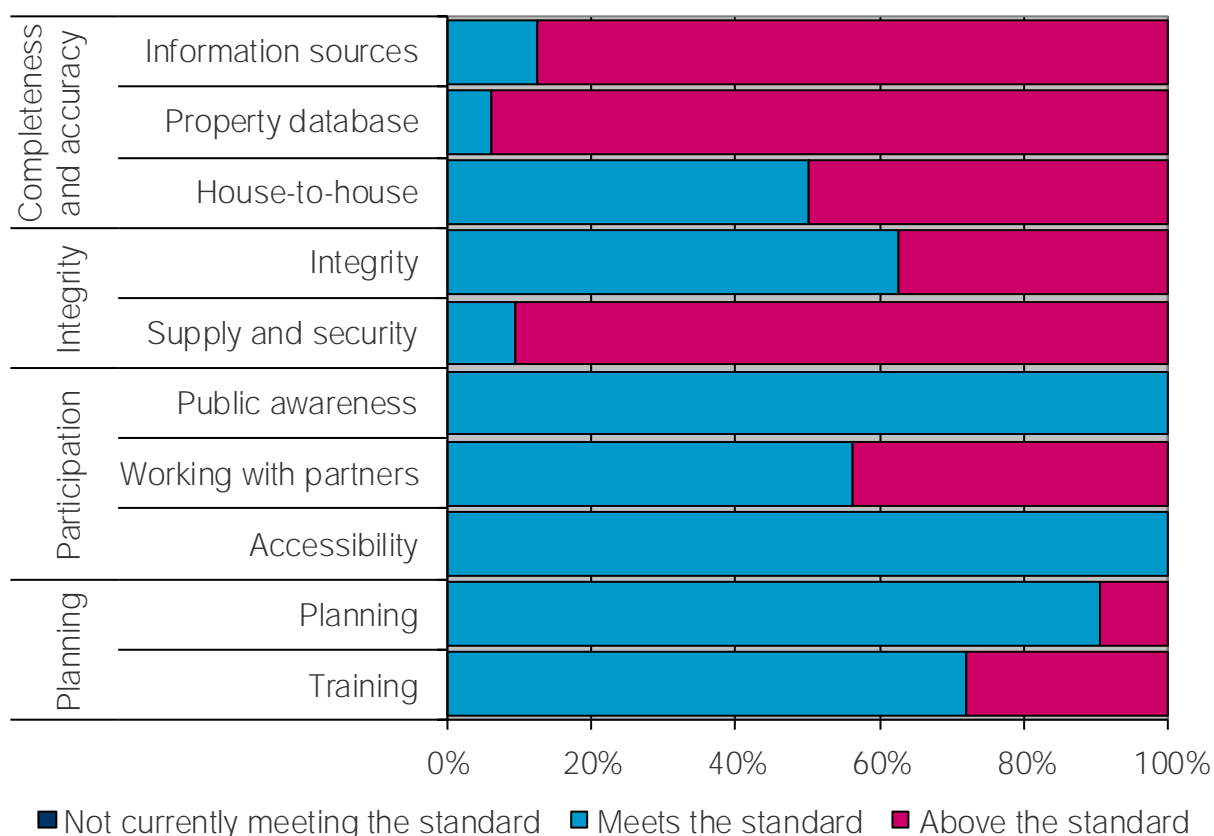
Scotland

3.18 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.⁵ 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.

3.19 As the same practices and procedures are used in every area where the ERO is appointed by a combination of councils, an assessment was made for each ERO rather than for each council area, meaning that there are 15 separate assessments rather than 32. To ensure comparability of performance between EROs in Scotland and those elsewhere in Great Britain, our analysis refers to the number of EROs appointed by the 32 Scottish councils, and we have indicated where relevant if an individual officer is appointed by more than one council. Chart 5 shows performance against the standards for the EROs in Scotland.

⁵ Section 8(3), Representation of the People Act 1983.

Chart 5: Performance of EROs in Scotland



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

- For the first time, EROs for all 32 Scottish council areas met or exceeded all 10 of the standards.
- The majority of EROs exceeded four out of the 10 standards, with performance being very strong in the first subject area, 'Completeness and accuracy', with nearly all officers reporting performance above Standard 1: 'Information sources' and Standard 2: 'Property database'.
- All EROs in Scotland met Standard 6: 'Public awareness' and Standard 8: 'Accessibility', but none reported that they exceeded the standards. For Standard 6, this was an improvement on 2009, when EROs for 10 out of the 32 councils were below the standard.

Completeness and accuracy of electoral registration records

3.21 EROs in Scotland performed very strongly in relation to the three standards which concern the 'Completeness and accuracy of electoral registration records' (Standards 1–3). All EROs were at least meeting the standards in the subject area. EROs for 28 of the 32 Scottish council areas (87.5%) reported being above Standard 1.

3.22 All but two EROs in Scotland exceeded Standard 2: 'Property database'. In the majority of cases, the people appointed as EROs in Scotland are also the Assessors.⁶ The Assessor is responsible for the valuation of domestic and non-domestic properties for the purposes of council tax and non-domestic rates. Both functions require the ERO/Assessor to maintain an accurate and up-to-date property database. Additional sources of information such as the Registers of Scotland are also regularly used by a number of EROs.

3.23 EROs for half of the Scottish council areas (16 out of 32) met Standard 3. The remaining 16 exceeded the standard.

3.24 Since the publication of our registration research in March 2010, we have met with the ERO for Glasgow three times to discuss their registration activities in much greater detail. Consequently we made 12 recommendations of ways in which they could improve the completeness and accuracy of the register. Since then, the ERO has worked with one of the council's service delivery managers to create a strategic improvement plan based on those recommendations and the performance standards framework. We have recently met with the ERO again to discuss the improvement plan and we will continue to monitor their progress towards meeting the plan's objectives.

Integrity

3.25 No EROs in Scotland were below Standard 4: 'Integrity', an improvement on last year when EROs for five Scottish council areas did not meet the standard. EROs for two-thirds of Scottish council areas (20) met Standard 4: 'Integrity', with the remainder (12) exceeding it. EROs for six areas exceeded Standard 4 in 2009 and five in 2008. Although there have been very few cases of electoral malpractice in Scotland, we found that EROs have codified their working practices and have set up triggers for when staff should pass an application on to their supervisor for further investigation.

3.26 Nearly all EROs (covering 29 councils) in Scotland exceeded Standard 5: 'Supply and security', with the remaining EROs, who act for three councils (9%), meeting the standard.

Participation

3.27 All EROs in Scotland met Standard 6: 'Public awareness', with no officers reporting performance above the standard. This is an improvement on the five EROs (acting for 10 councils) who were below the standard last year. Through our verification, we found that EROs are improving their strategic planning for promoting public awareness, but finding ways to evaluate these initiatives has been challenging.

⁶ Dundee City Council and Fife Council have each appointed one of their officers to act as the ERO separate from the Assessor.

3.28 We found that the improvements are due to EROs better identifying their target audiences and individuals or groups who can help promote public awareness (either council staff who deal with public relations or voluntary organisations who are giving EROs time to talk to their members). Some EROs are also branching out into new technology, including setting up Facebook pages or sending a campaign message out on Bluetooth transmitters.

3.29 All EROs in Scotland met or exceeded Standard 7: 'Working with partners', an increase of 16% on the previous year. Over half the officers (acting for 18 councils) reported meeting the standard, with the remainder above the standard.

3.30 All EROs reported meeting Standard 8: 'Accessibility', with no officers exceeding the standard. This represented an improvement on 2009, when the ERO for two councils reported being below the standard.

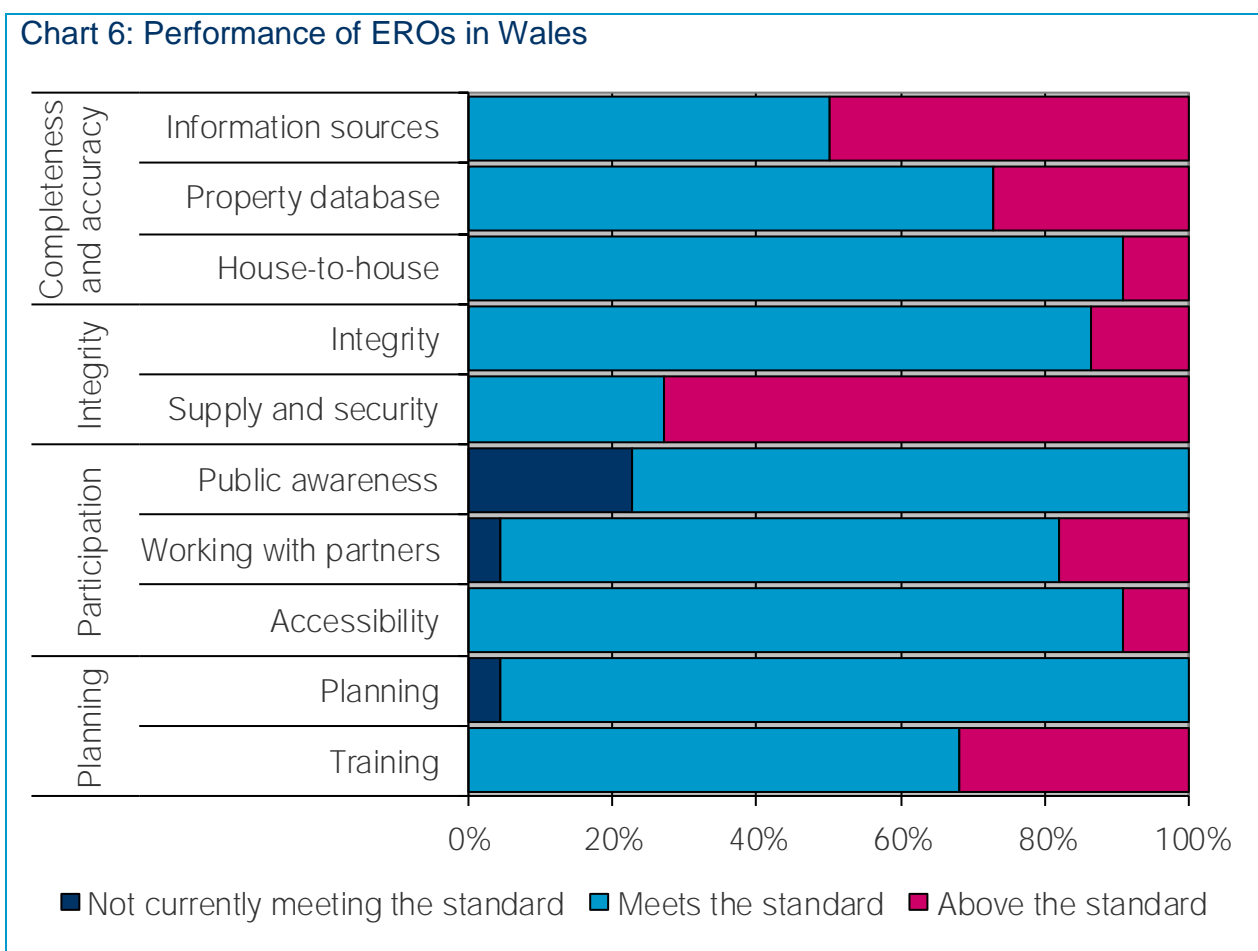
Planning and organisation

3.31 This was a strong area for EROs in Scotland, with no EROs below the standard for either of the two standards for the second year in a row. The vast majority (over 90%) met Standard 9: 'Planning', with the remainder exceeding the standard. The same ERO (appointed by three Scottish councils) was above the standard in both years. We found that there has been a move to a single comprehensive project plan instead of using different documents.

3.32 Three EROs (representing nine Scottish councils) exceeded Standard 10: 'Training', of which two EROs (representing six councils) also exceeded the standard last year.

Wales

3.33 Chart 6 shows EROs' performance in Wales across the four subject areas.



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

- All 22 EROs in Wales met or exceeded seven of the standards compared with five in 2009.
- EROs reported strong performance in the first subject area, 'Completeness and accuracy', with all EROs meeting all three standards.
- The biggest improvement in this subject area came in Standard 3: 'House-to-house', where three EROs (Merthyr Tydfil, Newport and Vale of Glamorgan) reported performance below the standard in 2009; they all met the standard this year.
- The weakest area, as in Great Britain as a whole, was Standard 6: 'Public awareness', where five EROs reported performing below the standard. This was, however, an improvement from nine below the standard in 2009.
- There was one ERO below Standard 7: 'Working with partners' and Standard 9: 'Planning' respectively.

Completeness and accuracy of electoral registration records

3.35 All EROs in Wales met or exceeded all three standards in this subject area. Standard 1 had the second highest proportion of EROs exceeding the standard (with half of EROs reporting performance at this level) compared with the other nine standards, with the proportion above the standard being slightly higher than last year. Standard 2: 'Property database' saw a decrease from seven to six in the number of EROs above the standard (the ERO for Wrexham reported performance at the standard, compared with above the standard in 2009).

3.36 This year, all EROs reported meeting or exceeding Standard 3: 'House-to-house', with two (Swansea and Newport) above the standard. In 2009 three EROs (Merthyr Tydfil, Newport and the Vale of Glamorgan) reported being below the standard.

3.37 Of these three areas, the EROs for Merthyr Tydfil and the Vale of Glamorgan have now reinstated house-to-house enquiries in target areas. In the Vale of Glamorgan, a significant amount of work has been done in the last year to address the gaps in the 2009 assessment, including: implementation of a canvass plan informed by a risk assessment; house-to-house enquiries carried out by 60 canvassers in targeted areas of low response; and the setting up of a training programme for canvassers.

3.38 An annual canvass was not carried out in Newport in 2009, but was reinstated in 2010. The narrative supplied by the ERO for Newport in 2009 stated that due to financial constraints it was not possible to carry out a canvass that included house-to-house enquiries. However, this year there was a new ERO who provided information on the 2010 canvass, which included house-to-house enquiries taking place in specifically targeted areas. Moreover, the ERO has set a benchmark response rate of less than 50% in a polling district as an indicator that house-to-house enquiries should take place. He now also monitors canvasser performance and personal visits are carried out to ensure that those in nursing and residential homes are registered. Large new housing developments in the city are closely monitored to ensure that occupiers are sent registration forms when they move in.

Integrity

3.39 All 22 EROs in Wales reported meeting or exceeding Standard 4: 'Integrity', an improvement from 2009 when three officers reported performance below the standard. There were three EROs who exceeded this standard (Newport, Neath and Merthyr Tydfil) compared with none the previous year. Improvement on the previous year's performance can also be seen in Standard 5: 'Supply and security', where all 22 EROs met or exceeded the standard, with the number reporting performance above the standard rising slightly (16 compared with 14 in 2009).

Participation

3.40 In line with Great Britain as a whole, a greater proportion of EROs in Wales did not meet Standard 6: 'Public awareness' (five EROs or 23%) than any of the other nine standards. This was an improvement on the previous year's performance (when nine EROs did not meet the standard), but again no EROs exceeded the standard.

3.41 All but one ERO in Wales met or exceeded Standard 7: 'Working with partners'; this includes four EROs who exceeded the standard. Again, this is an improvement on the previous year's performance, when three EROs reported being below the standard. As with the previous year's performance, there were no EROs in Wales who did not meet or exceed Standard 8: 'Accessibility', and two reported performance above the standard (down from three in 2009).

Planning and organisation

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

3.43 As in last year, all 22 EROs in Wales met or exceeded Standard 10: 'Training', with seven exceeding the standard (up from three in 2009).

Data collection 2010

3.44 Since the annual canvass in 2007, we have asked EROs to complete a data collection survey annually. The survey has provided quantitative data giving context for the standards. EROs have been asked to complete an additional data collection sheet to provide contextual information, including on the annual canvass return rate and the 'carry forward rate' – that is, the percentage of canvass forms returned to each local authority compared with the number sent out; and numbers of electors who fail to respond to the annual canvass but are retained or 'carried forward' on the register for another year.

3.45 This year, rather than including a summary of that data here, we will be carrying out a more detailed analysis of the 2010 annual canvass in autumn 2011. This will include an analysis of the electoral registration data collected from EROs as well as a survey of their practices in conducting the canvass. The report will: highlight areas of interest from the 2010 canvass, including an analysis of high/low response rates and the carry forward rate; highlight good practice by EROs; support our work in developing our understanding of electoral registration processes; and support the development of a baseline of knowledge on registration.

3.46 Our report will be preparatory to the introduction of individual electoral registration. The forthcoming introduction of individual electoral registration in Great Britain will provide more challenges for EROs, and the development of our performance standards must take account of the practical and legal framework for its introduction. We expect the framework to become clearer, as the UK Government develops the scheme further, later in 2011.

Appendix A – List of tables and charts

Chart/table number	Name
Table 1	Performance standards for EROs in Great Britain
Chart 1	ERO performance standards assessment process
Chart 2	Performance of EROs in Great Britain in 2010
Table 2	Percentage change in ERO performance from 2009 to 2010
Chart 3	Comparison of performance of EROs in Great Britain against the standards that require a written plan between 2008, 2009 and 2010
Table 3	EROs who have never met Standard 6: 'Public awareness'
Chart 4	Performance of EROs in England
Chart 5	Performance of EROs in Scotland
Chart 6	Performance of EROs in Wales

Appendix B – EROs who have not met a performance standard three times

Performance standard	EROs who have not met a performance standard three times
1: Information sources	2 – Barnsley, Nottingham
2: Property database	0
3: House-to-house	3 – Brentwood, Epping Forest, Hyndburn
4: Integrity	6 – Barnsley, Christchurch, East Hertfordshire, Norwich, Sutton, Windsor & Maidenhead
5: Supply and security	0
6: Public awareness	34 – Adur, Ashford, Boston, Broxtowe, Cannock Chase, Ceredigion, Cherwell, Chiltern, Christchurch, Corby, Craven, Dacorum, East Hertfordshire, East Lindsey, Eastbourne, Eden, Flintshire, Halton, Hambleton, Harrogate, Isle of Anglesey, Kingston upon Hull, Maldon, Middlesbrough, Milton Keynes, North Lincolnshire, Norwich, Portsmouth, Rugby, Solihull, Spelthorne, Sutton, Uttlesford, Worthing
7: Working with partners	10 – Christchurch, Copeland, Cotswold, Crawley, Flintshire, Halton, Portsmouth, Rugby, Rutland, Uttlesford
8: Accessibility	4 – Christchurch, Hambleton, Sutton, Uttlesford
9: Planning	4 – Boston, Christchurch, East Hertfordshire, Maldon
10: Training	0

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