Guidance for Electoral Registration Officers

Part 1 – Planning for the delivery of electoral registration activity

June 2019
# Updates to this document

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<td>• take account of the EU General Data Protection Regulation (GDPR) (effective from 25 May 2018) and the Data Protection Bill</td>
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<td>• update the list of legislation detailed in paragraph 1.8</td>
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1 About this guidance

1.1 This is part one of the comprehensive guidance produced to support Electoral Registration Officers in planning for and delivering well-run electoral registration services.

1.2 The guidance has been developed in close consultation with members of the Society of Local Authority Chief Executives (SOLACE), the Association of Electoral Administrators (AEA), the Scottish Assessors Association (SAA), the UK Electoral Coordination and Advisory Board (ECAB) and the Elections, Registration and Referendums Working Group (ERRWG). It reflects the ERO’s legal obligations and what we, SOLACE, the AEA, the SAA, the ECAB and the ERRWG believe that EROs should expect of their staff in planning for and delivering well-run electoral registration services.

The guidance relating to the Scottish Elections (Reduction of Voting Age) Act 2015 has been developed in close consultation with the SAA, AEA and the Electoral Management Board for Scotland (EMB), and reflects what the SAA, AEA and EMB believe EROs in Scotland should expect of their staff in planning for and delivering well-run electoral registration services in relation to young electors.

Any specific considerations or differences arising from this legislation are highlighted in break-out boxes like these throughout the guidance.

1.3 The key to maintaining an accurate and complete electoral register continues to be good local engagement strategies and a registration plan, designed to support targeted local activity; effective partnership work across and beyond the local authority; and a continued focus on progress and results so that adjustments can be made if necessary. Our guidance, tools and templates, along with support provided by our teams across England, Scotland and Wales, will assist you with engaging with residents, including to encourage people to get registered. The tools and templates we have produced are highlighted in break-out boxes throughout the guidance. Alongside this document, we have published the following tools and templates:

- a template public engagement strategy
- a template registration plan
- a template risk and issues register
- example tactics for reaching target audiences
- a contract development and management checklist
- a factsheet on producing accessible communications
1.4 We have also published public engagement resources which are all available on our website.

We have been working with the AEA to identify specific examples of good practice in electoral registration. The following resources have been published on our website and are highlighted in break-out boxes throughout the guidance.

- Use of tablets in electoral registration
- Communications
- Reaching care home residents
- Effective personal canvassing
- Encouraging responses
- Reaching students
- Effective use of available data
- Effective management of registration processes

Our resource on the EU General Data Protection Regulation and the Data Protection Act 2018 also contains examples of good practice in relation to data protection.

1.5 We are aware of the challenges facing local government in general and EROs and their teams in particular in the current financial environment. As an example of this, the supporting tools and templates we are providing are intended to make it easier for you to deliver electoral registration locally, and avoid the need for each ERO to produce their own resources for the same purpose. In developing our guidance and resources we have sought to recognise that there are different challenges facing EROs across England, Scotland and Wales and that there may be different approaches that could be taken to address those challenges.

For any questions related to funding for the delivery of IER, contact the Cabinet Office at: ierservice@digital.cabinet-office.gov.uk

Performance standards

1.6 In 2016 we published a performance standards framework designed to support EROs in planning for and delivering well-run electoral registration services. We consulted widely with the electoral community to inform the development of the framework and it has been endorsed by the UK Electoral Coordination and Advisory Board (ECAB). You will find references to the performance standards framework embedded throughout the guidance. The
The overall objective of the performance standards framework is to support EROs in planning for and delivering well-run electoral registration services. The framework was developed around key outcomes from the perspective of ensuring that all eligible people are able to participate in the electoral process, should they wish to do so, and of achieving electoral registers that are as accurate (including ensuring no fraudulent entries on the electoral register) and complete as possible.

The legislative framework

1.7 The guidance has been produced based on, and should be read in accordance with, the requirements set out in the following legislation (as amended):

- Representation of the People Act 1983
- Representation of the People Act 1985
- The Scotland Act 1998
- Political Parties, Elections and Referendums Act 2000
- Representation of the People Act 2000 (Schedule 4)
- The Representation of the People (England and Wales) Regulations 2001 (as amended)
- The Representation of the People (Scotland) Regulations 2001 (as amended)
- European Parliamentary Elections (Franchise of Relevant Citizens of the Union) Regulations 2001
- European Parliamentary Elections Act 2002
- Electoral Administration Act 2006
- Government of Wales Act 2006
- Local Electoral Administration and Registration Services (Scotland) Act 2006
- Representation of the People (Absent Voting at Local Government Elections) (Scotland) Regulations 2007
- National Assembly for Wales (Representation of the People) Order 2007
- The Scottish Parliament (Elections etc.) Order 2010
- Local Electoral Administration (Scotland) Act 2011
- The Electoral Registration and Administration Act 2013
- The Electoral Registration and Administration Act 2013 (Transitional Provisions) Order 2013
- The Representation of the People (England and Wales) (Amendment and Description of Electoral Registers) Regulations 2013
- The Representation of the People (Scotland) (Amendment and Description of Electoral Registers) Regulations 2013
- The Representation of the People (Appointment of Proxies) Regulations 2013
- The Representation of the People (England and Wales) (Amendment) Regulations 2014 and The Representation of the People (England and Wales) (Amendment No.2) Regulations 2014
• The Representation of the People (Scotland) (Amendment) Regulations 2014
  and The Representation of the People (Scotland) (Amendment No.2) Regulations 2014
• The Representation of the People (Supply of Information) Regulations 2014
• The Representation of the People (England and Wales) (Amendment) Regulations 2015 and Representation of the People (Scotland) (Amendment) Regulations 2015
• The Scottish Elections (Reduction of Voting Age) Act 2015¹
• The Electoral Registration and Administration Act 2013 (Transitional Provisions) Order 2015
• The Representation of the People (England and Wales) (Amendment) (No. 2) Regulations 2015 and the Representation of the People (Scotland) (Amendment) (No. 2) Regulations 2015
• The Representation of the People (England and Wales) (Amendment) Regulations 2016
• The Representation of the People (Scotland) (Amendment) Regulations 2017
• The Data Protection Act 2018
• The EU General Data Protection Regulation (GDPR) 2018
• The Representation of the People (England and Wales) (Amendment) Regulations 2018
• The Representation of the People (Scotland) (Amendment) Regulations 2018 and the Representation of the People (Scotland) Amendment Regulations 2018

1.8 In addition, you are also required to have regard to the public sector equality duty contained in Section 149 of the Equality Act 2010 when carrying out your duties. EROs in Wales must also have regard to the Welsh Language Act 1993 and the Welsh Language (Wales) Measure 2011, which require services in Wales to be delivered in the Welsh language. Whenever there are any changes to the legislation, we will provide further guidance and support to EROs and update the relevant guidance Parts as appropriate.

¹ The change to the franchise also applies to any other elections in Scotland, such as National Park elections, that use the local government register (and only the local government register) for the purpose of determining the franchise. Throughout this part, any references to local government elections in Scotland should be read as including these other elections.
2 Keeping your public engagement strategy under review

Why having a public engagement strategy is important

2.1 As ERO you have a general duty to promote participation in the electoral process in your area. Maximising the number of voters registered relies on an effective local public engagement strategy with robust processes behind it.

2.2 The challenge of maximising registration takes place in the context of wider challenges for electoral registration, including voter disengagement, transient populations and the other registration challenges that exist in your area. The lessons you have learnt in addressing these challenges to date should be reflected in your updated public engagement strategy.

2.3 Effective public engagement activity will help to reduce the reliance on follow-up activity, which has the potential to reduce the resources you will need for follow-up work.

2.4 Effective public engagement involves input from across the local authority. You will need to maintain the relationships you have with other teams including IT, communications and engagement professionals (where available) and other teams in the local authority who have contact with those residents less likely to be registered. You will also need to work with external partners as set out below.

To be able to achieve the outcomes set out in performance standard 1, you will need to develop a clear picture of the challenges in your area and a strategy to respond to these challenges and incorporate this into your registration plan. Your strategy should include:
- a ward level data analysis of the area
- priority areas to target registration activity
- how you will use the channels available to reach identified groups and existing electors, including direct contact routes, local partners, media and advertising.
In Scotland, eligible 14 and 15 year olds will be included on the local government register as attainers. For further information on who qualifies as an attainer, see Part 2: Registration framework.

Your public engagement strategy will therefore also need to address how you will identify and target this group, with a view to maximising the number of attainers on the register.

What is public engagement?

2.5 Public engagement includes:

- Any forms, letters or emails you send directly to individuals or households.
- Phone calls, e-mails and direct face-to-face conversations with canvassers
- Local activity with partner organisations who will spread the message on your behalf
- Contact with organisations such as schools, universities, landlords, housing associations and hostels
- Press releases, media work and use of social media
- Public awareness activity including local advertising and publicity directly aimed at residents

Support from the Commission with public engagement

2.6 This guidance sets out approaches for identifying local challenges and the tactics available to you to reach residents in your area. You should record in your public engagement strategy what approaches and tactics you are using.

2.7 These should build on your experiences administering the last canvass and during scheduled polls, and in relation to your ongoing activity to maximise registration.

In Scotland, you should also draw on your experience of targeting 15 and 16 year-olds to date and reflect any lessons learnt in your public engagement strategy.

Resources

2.8 The Commission has provided a range of resources to support your public engagement activity which are available on our website. Although some of these resources were developed specifically to support the transition to IER, they can be updated and adapted and so may still be helpful in supporting your activity locally.
Direct support
2.9 Direct one-to-one support also continues to be available through our offices in Scotland and Wales and our English regional teams.

Partnership work
2.10 EROs will not be able to meet the challenge of maintaining an accurate and complete electoral register by working in isolation. You will need to work collaboratively, drawing on the expertise of others, both from within the local authority and externally.

2.11 To support local partnership work we have produced a range of partnership resources available on the Commission’s website which includes practical suggestions for how partners could help to get people registered. These resources will be updated ahead of scheduled polls, but include general guidance and suggestions which continue to be relevant and could be shared with partners locally. You can also subscribe to our voter registration newsletter ‘Roll Call’ which contains the latest information about promoting voter registration and our partnership work.

Reviewing your public engagement strategy

2.12 Your public engagement strategy should map out who you need to engage, how you are going to target them and how you are going to work with internal and external partners to ensure you reach people. You should monitor and keep the document under review and update it to reflect lessons learnt from the work you have already undertaken and any emerging information about your registration area.

2.13 Your strategy should identify how you will use all the information available to you. This includes information obtained during the last canvass and at scheduled polls, and from your ongoing work to maximise registration, to refine the picture of the demographics of your area and confirm what the key challenges for engaging with your residents are.

2.14 Your strategy should set your priority areas (which may or may not have changed and should be kept under review) and how you will specifically target particular groups and/or areas in order to maximise registration of those who are eligible.

In Scotland, your public engagement strategy will need to be reviewed to include how you will continue to identify and target eligible 14 and 15 year olds, building on your experiences to date.

2.15 In respect of partners, for example, it should outline who the partners would reach and how they will be engaged to ensure that they are on board, have all the information they need, and understand the timings for the work. In reviewing your public engagement strategy, you should consider the impact that the work of
your partners has already had and, building on this work, continue to seek new partners as you further refine your strategy.

2.16 Your strategy should also outline how you will monitor and evaluate your public engagement activity.

2.17 Keeping your strategy under review should involve the following:

**Step 1**
Refining the profile of your registration area
- Use data from the last canvass and your wider registration work
- Refine the profile of the different groups in your area

**Step 2**
Checking the audience for public engagement
- Confirm target groups needing additional engagement
- Confirm local priorities

**Step 3**
Reviewing the available channels for engaging residents

3a. Direct contact with residents
- How the canvass and activities throughout the year will be conducted
- What will be done throughout the year to follow up with under registered groups

3b. Working with local partners to reach target audiences
- Review existing partnership activity
- Identify further partners and work with them to enable your messages to have greater reach
- Maintain relationships within and outside the local authority
- Build links with other local authorities to deliver coordinated engagement and share resources where appropriate
3c. Raising awareness through advertising and media
- Review effectiveness of media channels, advertising and communications used for the last canvass and wider registration work
- Based on your review, identify appropriate channels for awareness raising
- Media relations planning where appropriate

Step 4
Continuing to identify and refine tactics to reach your target audiences as part of the review of your strategy and identify actions which can be reflected in your registration plan

Step 5
Ongoing monitoring and evaluation
- Monitoring progress
- Evaluating public engagement activities
Step 1: Refining the profile of your registration area

2.18 Your strategy will need to address how to engage those who are less likely to be registered.

2.19 Research carried out by the Commission has found clear links between registration rates and certain demographics:

- younger people (under 35) remain considerably less likely to be registered
- people who rent from a private landlord remain considerably less likely to be registered
- people of white or some Asian ethnicities are more likely to be registered than some Black, mixed or other ethnicity groups
- citizens of the European Union and Commonwealth are under-registered
- those classified as social grade DE are less likely to be registered than other social grades

2.20 You will already have built a detailed profile of the make-up of your registration area using available data sources, such as data from your local authority and the census.

In Scotland, the inspection of local authority education services data may provide you with information which could assist with the identification of potential electors aged 14 to 18 years who may be eligible to be registered either as attainers or electors.

Your strategy should detail how you will engage with 14-17 year-olds in your area. You will be able to draw on your experiences of engaging with young people to date and use the lessons learnt to inform your engagement strategy.

2.21 You should now refresh the information on which you built the profile of your registration area and consider any additional data which can be used to further refine the picture. For example, the local authority may have demographic information about residents as well as the sorts of activities they take part in, the services they use, their attitudes, their communication preferences and where geographically different groups are clustered.

2.22 Some authorities make use of extensive consumer classification systems to identify the types of people in their area so that they can locate others that match their profile and then use resources effectively to target such groups with relevant information. This data may have been updated since you last updated your public engagement strategy and you should ensure that your public engagement

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2 All studies conducted by the Electoral Commission on the quality of the electoral registers are available on our website: [http://www.electoralcommission.org.uk/our-work/our-research/electoral-registration-research](http://www.electoralcommission.org.uk/our-work/our-research/electoral-registration-research)
strategy reflects the latest data. All this information will provide insight into the
particular challenges in your registration area and enable you to refine the
audience for your public engagement activity.

2.23 Your target groups may be distributed evenly across the authority, for
example attainers, while others, such as students or private renters, may be
concentrated in particular wards or neighbourhoods. This information can be
used to inform your planning for the canvass.

Detailed guidance on preparing for and carrying out the 2019 canvass is
contained in Part 3: Canvass. Guidance on maintaining the register
throughout the year, including on deletions and administering registration
reviews, is contained in Chapters 9 and 10 of Part 4: Maintaining the register
throughout the year.

To meet the outcomes set out in performance standard 1, you will need to
identify and utilise data sources, as well as any other information you
have, to highlight potential groups of electors who are less likely to be
registered and develop a clear picture of the challenges in your area. To
demonstrate how the outcomes have been met, your public engagement strategy
should include:
- a ward level data analysis of the area
- priority areas to target registration activity

Step 2: Checking the audience for public engagement

2.24 Eligible electors in your area will fall into distinct groups in relation to
registration:

Unregistered / new electors
2.25 Any new elector will need to make a registration application and provide
their personal identifiers in order to register to vote.

In Scotland, the requirement to provide a National Insurance Number
(NINo) does not apply to 14 and 15 year olds. Their identity will not be
verified against DWP records. Instead, it will need to be verified using
educational records or other local data sources. For further information on
verifying an applicant’s identity, see Chapter 5 of Part 4: Maintaining the register
throughout the year.

2.26 Those who are not on the register, including typically unregistered groups,
remain a target for registration activity. The groups that are less likely to join the
register and the barriers that stop them doing so will vary by area, creating
unique local challenges. There is an ongoing challenge in identifying local issues
and taking action in response to these to ensure that as many people are registered as possible.

**Social groups needing additional engagement activity**

2.27 Research has shown that certain groups are more likely to be absent from the register or not registered at their current address.

2.28 The reasons for particular groups being absent from the register are diverse – for example, they may be transient in where they live, they may be disengaged with politics, or they may be unaware of their rights. This means that these groups need to be reached in different ways, using different channels, and that they will be motivated by different messages.

2.29 From the profile data you have gathered, you will have identified the specific social groups in your area that are less likely to join or be on the register, either because they are typically under-registered, or because they do not typically respond to communications from the ERO. These groups will need additional targeted engagement activity to increase the likelihood that they will join the register. These groups may include:

**Under-registered groups and those who may face barriers to registering**

- Private renters
- Home-movers and mobile population
- Young people (under 35s)
- Attainers
- EU and Commonwealth citizens
- Some black and minority ethnic groups (African, Mixed, Bangladeshi)
- People resident at their property for less than 2 years
- People who have lived in the UK for less than 5 years
- Low level of English fluency
- Unemployed
- Young people with no qualification
- Students at term-time address

2.30 Some challenges may not be audience-specific but may be particular to your area. For example you may have geographical barriers, or you may have low levels of broadband connection that mean people will find it harder to access online registration. Your strategy should also consider how to address these considerations.

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3 Further detailed information is contained in Electoral Registration in 2011.
2.31 You will have identified the groups that need particular engagement activity in your public engagement strategy. After reviewing the profile of your registration area, you should review the particular groups identified to ensure that they remain relevant. Your resources might need to be re-directed, you might need to continue your work but refine your approach, or another group might have emerged requiring particular engagement, such as attainers.

**Electors who are already registered**

2.32 These electors will have their names included on HEFs sent out as part of the canvass. They will need to know how to confirm that the details included on the HEF are correct, and what to do if any changes are required to their registration information.

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**Detailed guidance on preparing for and carrying out the 2019 canvass, is contained in Part 3: Canvass.** Guidance on maintaining the register throughout the year, including on deletions and administering registration reviews, is contained in Chapters 9 and 10 of **Part 4: Maintaining the register throughout the year.**

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**Step 3: Reviewing the channels for engaging residents**

2.33 You will already have identified and implemented channels for reaching the target groups you have identified. You should continue to evaluate your approach and determine what worked well and what was less successful, recognising that different channels may have worked differently for different groups.

2.34 You should consider the effectiveness of the channels you used during the last canvass and at scheduled polls, and in your ongoing wider registration work, and whether they enabled you to reach your target audience. For further information on monitoring and evaluating your activity, see step 5 below.

2.35 Example channels, which are detailed below, include:

1. **Direct contact with residents – whether by letter, face-to-face, over the phone, or by e-mail**
2. **Working with partners – such as local authority departments or community organisations**
3. **Advertising and media relations – such as posters or publicity events**

3a: **Direct contact with residents**

2.36 An important element of your public engagement strategy is the direct contact you have with individual residents. This includes letters, telephone conversations, text messages, emails, and door-to-door visits. Your experiences
during the last canvass and your ongoing wider registration work will have given you a good indication of which areas respond quickly to written communications and which are more likely to require personal visits. You can use this information to inform your plans for the canvass. For example, in areas that do not respond well to written communications it might be a better use of resources to undertake personal visits earlier in the process compared to other areas.

2.37 EROs can give an invitation to register by electronic means, including by email. This means that rather than sending potential electors an invitation to register with a voter registration form and a return envelope, you can (where you have their email address) email them the invitation to register with a link to www.gov.uk/register-to-vote. This option should be reflected in your strategy and wider registration plans.

2.38 The letters and emails you send out must be easy to understand and carry clear messages about what the recipient needs to do. You should utilise the template wording that the Commission has provided, which reflects the results of user testing.

2.39 For your public engagement strategy and registration plan, you will need to have established the practical process for writing out to residents for the canvass, including timings. You will also need to consider timings for your public engagement activity that supports the canvass, which should include any potential opportunities to link to any wider national or local voter registration activity.

2.40 For example, National Democracy Week, which aims to increase the number of people who understand and take part in the democratic process, is one such opportunity. Depending on when you issue your HEFs for the canvass, you may be able to capitalise on this and the accompanying national publicity, to drive canvass responses and raise awareness among under-registered groups.

2.41 We will keep you updated with our plans for National Democracy Week via our EA Bulletin. You should also ensure that you are subscribed to our Roll Call newsletter which contains the latest information about promoting voter registration and our partnership work.

2.42 The Cabinet Office has made available resources that you can use to promote registration activities you have planned during this year. Cabinet Office and Department for Education make secondary schools resource available and has a Youth Engagement Toolkit for parliamentarians to use with young people in their areas. In addition, the National Democracy Week website will include details of events planned for this summer and details of the Democracy Week Awards and you can subscribe to the National Democracy Week newsletter which provides updates about National Democracy Week.
Sharing good practice
For information on and examples of how some EROs are utilising their registration stationary and materials to encourage responses, see our resource ‘Encouraging responses’.

For examples of how some EROs have tailored their public engagement activities to best motivate and engage people to take action in their area, see our resource ‘Communications’.

Dealing with responses from the canvass and other registration peaks
2.43 Your public engagement strategy and registration plan need to address how the high level of response and queries that will occur around peaks in public engagement activity and in the run-up to registration deadlines can be resourced as effectively as possible.

2.44 You will have experience of managing peaks in your workload during the last canvass and at scheduled polls, and you should use this experience to plan for the peaks around the canvass and in the run-up to any scheduled polls.

Dealing with enquiries from residents
2.45 The canvass and other public engagement activity that residents come into contact with will prompt queries and questions. It’s important that you provide sufficient support for residents who have queries in terms of:

- Enquiry channels – providing telephone support for public information response is important because many residents will have difficulties accessing the internet or understanding written material.

At the same time, other residents will expect to be able to e-mail queries, talk to someone face-to-face or write letters to the ERO. In addition, some residents may try to speak to other local authority frontline staff outside of the electoral registration team or the corporate contact centre, such as in libraries or leisure centres.

You should consider providing updated face-to-face briefings or written information to local authority staff at these facilities to ensure they have the information they need to be able to respond to any queries they may receive on the canvass or in the lead up to scheduled polls. These briefings or written information should reflect the types of issues raised by residents during the last canvass and at scheduled polls.

- If you provide other methods for residents to contact you, such as Facebook, Twitter, web-forms, and text messages, you should review how effective these channels have been in responding to queries, and also the volume of queries you have received through these channels.
For example, if you received a significant number of queries via web-forms, this could indicate high usage of your local authority website but may also suggest that the information provided there could be clearer in order to mitigate queries.

You should promote the various channels through which residents can contact you in your public information materials and in the engagement activities you undertake.

- **Resourcing** – if you promote a method of contacting the local authority such as a phone number or e-mail address you need to ensure that it is sufficiently resourced.

You should review the effectiveness of your resourcing during the last canvass and at scheduled polls to inform your future planning – for example, were you able to respond to queries received via phone, e-mail or other channels in a prompt and efficient way? A high volume of queries received through one channel could indicate that you should allocate additional resources to responding to queries via that particular channel.

You should also consider how many enquiries came through routes that you were not promoting, and identify how you can best ensure that employees are briefed to manage them. Where you received significant contact via a method you were not promoting, this could be a communication method you look to utilise further in the future. To plan levels of resourcing you should consider:

- The peaks for demand for public information. These are likely to occur following peaks in public engagement activity, for instance in the weeks following the issue of HEFs for the canvass, and in the run-up to registration deadlines.
- What level of enquiries you received during peaks in registration activity, such as at key points in the last canvass, and what level of queries you usually receive in the run-up to the registration deadline for scheduled elections.
- Whether you are in a position to outsource responses, for example by contracting a specialist call centre, or whether you are able to increase resources at your existing call centre. You should review the effectiveness of your approach during the last canvass and at scheduled polls, and consider whether in light of your experiences you need to do anything differently.
- What contingencies you can put in place for responding to residents if enquiries are much higher than expected. You should test your contingency arrangements to ensure that
they are robust.

- **Response time** – where queries are not dealt with immediately it is important that you establish a fixed timeframe in which responses will be made, and you should let the enquirer know when they can expect to receive an answer.

  For example, you could set up an automatic response to e-mails letting the enquirer know that you will get back to them within 48 hours. You could include answers to frequently asked questions with this automated response, together with links to www.gov.uk/register-to-vote and to the absent voting forms on your website or on www.yourvotematters.co.uk.

- **Information provided** – you will need to ensure that employees responding to enquiries are fully equipped to answer questions or refer the caller to the right place. This means thinking about the likely queries people will have and developing scripts and lines to take that answer these.

  We have provided an FAQ resource to support you in doing this which can be found on our website. You should also consider briefing relevant staff so they have an understanding of the registration process and the information around it.

In Scotland, you will also need to be prepared to deal with enquiries from, and relating to, 14-17 year olds. In particular, you should be prepared to deal with enquiries relating to the registration of 14-15 year olds, who will have no experience of the registration system.

To inform your planning, you should consider the level and type of enquiries you received during the last canvass and at Scottish Parliamentary and local council elections, and the channels through which these were received.

**Reducing the level of enquiries**

2.46 Providing clear and easy to navigate information about registration on your website, and directing residents to the online registration website (www.gov.uk/register-to-vote) and www.yourvotematters.co.uk will help to reduce the burden on public information response lines. The better the information available and the easier it is to access, the less people will become frustrated and reach for the telephone. This is equally applicable to other information resources you supply to residents.

**Following up with non-responders**

2.47 EROs have to take steps to obtain responses from residents in response to both household enquiry forms (HEFs) and invitations to register. This will include sending out further reminders for both types of forms and using
canvassers to conduct personal visits to non-responding properties/individuals. Your registration plan should set out how you will do this.

In Scotland, the legal requirement to conduct personal visits in relation to 14 and 15 year olds does not apply.

Part 3 – Canvass includes further information on the practical aspects of issuing reminders and making personal visits during the canvass.

3b: Working with partners to reach target audiences

2.48 Continuing to work with partners, both inside and outside the local authority, will be key to effectively delivering your registration plan and promoting public awareness.

2.49 The option of applying to register online provides a range of opportunities to integrate registration into other services the council provides and to deliver electoral registration more efficiently.

2.50 For example, if you have not already done so, the online application form could be signposted on those webpages that residents would most commonly use to carry out a transaction with the local authority, such as the page on which to register and pay for Council Tax.

2.51 Partnerships can help you in a number of ways to raise public awareness:

- For some social groups, messages are more likely to be acted upon if they come from someone they trust and know – for example, you may contact a respected community leader or organisation to ask them to talk to their community about registering.
- Partners can also raise awareness by making the issue a familiar part of everyday life.
- Partners can extend the reach of your advertising – for example, a dentist may put posters in their waiting room.
- Partners may include information in the communications they already send out.
- Partners such as charities may also help you to increase your capacity by answering people’s questions and supporting them to fill in forms.

2.52 It can take time to set up partnerships, and to build and maintain effective relationships. Partnerships should be free, with each side getting a mutual benefit.
for entering the partnership. However, some costs – for example, for the production of materials for partners to use with residents – may be incurred. To assist with this, there are a range of public engagement resources and partnership resources available on the Commission’s website which could be used or developed as assets for future campaigns. You can also subscribe to our voter registration newsletter ‘Roll Call’ which contains the latest information about promoting voter registration and our partnership work.

2.53 These will be updated as appropriate ahead of scheduled polls, but include general guidance and suggestions which continue to be relevant and so may still be helpful in supporting your activity locally.

2.54 Partnerships can be established at every level, from working with individual community leaders to national businesses as part of a large 'partnership marketing' strategy. Partnerships also need to be built internally within the local authority and with organisations that provide services for the local authority. It will be important for you to identify and build a relationship with the correct point of contact in each case.

To be able to achieve the outcomes set out in performance standard 1, you will need to identify suitable internal and external partners who you believe can assist with ensuring all eligible electors are encouraged to register to vote. To demonstrate how the outcomes have been met, your public engagement strategy should include how you will use the channels available to reach identified groups and existing electors, including the identification of local partners to assist with this.

In Scotland, you should consider obtaining advice from your local education services and child protection departments to support you in selecting appropriate partners to engage with those who are under 16.

What partners can do

2.55 The scale and timing of partnerships and the amount of activity they undertake will vary hugely. It could include providing registration forms for estate agents to attach to rental contracts, identifying a charity whose volunteers are willing to help people fill in forms, or working with a large local employer who is keen on supporting community causes. It could also involve you providing materials for or working together on delivering a workshop on democracy and registration. In some cases the partner may be able to identify opportunities that you had not considered.

Identifying potential partners

2.56 It is important at this stage for your public engagement strategy to build on the existing partnership arrangements you have established, as well as to identify potential new partners.
2.57 Partners could include groups or individuals who:

- have previously supported registration work
- are in regular or significant communication with target audiences
- have good relationships with target audiences and have previously worked with the local authority but not on registration
- have good relationships with target audiences and have never worked with the local authority
- have a high profile in the local area among broad audiences

2.58 Partners could include:

- Service providers - for example, housing associations, home care services, schools, further education colleges.
- Other governmental organisations and local authority teams – for example, parish councils, housing services, social services.
- Influential individuals – for example a prominent student landlord, local celebrities, politicians, political parties and candidates.
- Community groups and charities – for example, a boxing club, Neighbourhood Watch, over-60s social, disability charity.
- Private companies and organisations – for example, a large local employer, gym, dentist, estate agent.

2.59 For further examples, see our example tactics sheets under ‘Step 4: Continuing to identify and refine tactics to reach your local target audience’ below.

2.60 As you won’t be able to work with everyone, decision-making processes on possible partnerships need to consider the local picture, including who will best reach target groups, what are the practicalities of working together, what would be the level of engagement in the partnership, and a range of other factors that will vary locally.

2.61 Evaluation of the value added by your existing partners during the last canvass and at scheduled polls will be invaluable in informing future decisions on partnerships.

2.62 You will need to also consider cost benefit – some partnerships may take a large amount of time to set up and reach only a very small number of people. But if those people are high on your target list and unlikely to be engaged in other ways, the partnership may still be worthwhile.

2.63 Similarly, an organisation that works with residents who are not on your target list, but reaches a huge number of residents and is committed to taking time to spread your messages could at least be considered.
2.64 It may be beneficial to categorise your list of partners based on their capacity to deliver, identifying which partners will require more resources from you to help them deliver more detailed activity, compared to those partners who have agreed to simply relay or promote registration messages.

2.65 To support local partnership work we have produced a range of partnership resources available on the Commission’s website which includes practical suggestions for how partners could help to get people registered. These resources will be updated ahead of scheduled polls, but includes general guidance and suggestions which continue to be relevant and could be shared with partners locally.

**Politicians and political parties**

2.66 Candidates and their supporters can extend your registration reach as they may be interested in promoting registration during their electoral campaigning. Parties also have a number of volunteers who may be involved in doorstep canvassing and so could potentially spread your registration message. Where candidates, parties and politicians are not engaged, there is a risk that the messages and information they provide to residents about registering could be wrong or incomplete. It is therefore important that you develop a plan for working with these individuals and groups and that they understand how the registration process works.

**Approaching partners about supporting registration**

2.67 You will need to approach potential or existing partners about the possibility of them supporting your registration work. To an extent, you will need to ‘pitch’ your request to them to ensure that it has the highest chance of getting them on board, particularly as they may have requests from other organisations.

2.68 Before you approach partners it would be useful to have ideas of how they could help, and how helping out would be beneficial both to them and to the people they work with. It is also worth thinking about the timing of your approach – will they, for example, be busy at a particular time with a specific priority?

2.69 You should consider how effective your approach to partners was for the last canvass and your subsequent registration work, and identify whether there is anything you could do differently to achieve better results.

2.70 Despite your efforts, some organisations and individuals will not be in a position to get involved; it’s important to accept this and where possible consider alternatives. You will also need to support partners throughout the activity in order to increase the likelihood of them remaining engaged.

**Partnership risks**

2.71 Involving other individuals and organisations in the delivery of your plans presents risks. That is not to say the risks should stop you working with partners, but you will need to be aware of them and identify mitigations appropriate to the
particular risks in your area – this should be captured in your risk and issues register. Some of the potential risks include:

- **The partnership results in wide-scale complaints** – For example, because a perception that the ERO is not politically neutral if the partner engages in political campaigning.

- **The partner misrepresents your message** - Do they understand the relationship and their responsibilities? Do they understand the message you want to get across to residents? Do they keep to the message, and to what extent does it matter if they don't? Are they clear when the work ends, or when the message changes?

- **The partner does not carry out the work they agreed** - Is this risk more significant because you have put time and money into the relationship? Perhaps they misunderstood the workload, or find themselves with an unexpected priority, or perhaps they start to incur additional costs and expect re-imbursement.

- **Registration fatigue** – Initial enthusiasm might fade so it will be important to try to maintain momentum in any partnership work, including by keeping up communication and providing feedback.

- **The cost outweighs the benefits** - You may produce comprehensive materials and the organisation does little to help support your registration work.

2.72 You should consider developing lines to take in the event an organisation working in partnership attracts negative press coverage which might implicate your local authority.

2.73 When evaluating the partnership work you have undertaken you should consider how effective you were at mitigating the risks outlined above and any other risks you identified. These learning points should be reflected in your updated engagement strategy and used to help to inform your approach to other partnership working.

**Setting up the partnership**

2.74 In setting up the partnership, taking account of the above risks and any other risks you identify locally, the following points should be addressed:

- explain why the partnership is beneficial to both parties
- agree the level of support the partner will offer
- understand the mechanisms they will use for reaching their audience
- agree whether any materials will be needed and, if so, who will be producing them
• agree what messages they will use in communicating with their audience
• agree what information they will provide on how the audience can respond or where they can get more help
• agree who at the local authority will be available to answer the partner’s questions
• be clear about timings and when messages need to change
• establish regular communications
• ensure that if things are not going as planned they are open to stopping the activity and, where relevant, returning materials
• agree an approach to evaluation of the activity

2.75 Particularly for larger partnerships, you may want to have a telephone conversation or face-to-face meeting to cover these considerations. You and your partner should evaluate the effectiveness of the activity and provide feedback as appropriate. For example, if the activity has resulted in an increase in the registration levels of your target group, you should ensure that you feedback this success to our partner as this may encourage your partner to undertake further work with you.

• To comply with data protection legislation, you will need to be able to demonstrate that all information obtained, whether from internal or external partners, complies with the principles of processing personal data, ensuring that it is processed lawfully, fairly and in a transparent manner.

2.76 In addition, where you are obtaining personal data from external organisations, you should consider having a formal data-sharing agreement. These organisations are likely to be data controllers in their own right, for example, universities and care homes will hold personal data on their students and residents respectively.

2.77 Although data protection legislation does not require a written agreement when sharing data between data controllers, it is strongly recommended that you agree with your partner a data sharing agreement/protocol. This will help you both demonstrate that you are acting in accordance with data protection legislation.

Our resource on the EU General Data Protection Regulation and the Data Protection Act 2018 also contains a checklist to support you in developing a data sharing agreement.

Sharing good practice
The Scottish Assessors Association (SAA) have made available the data sharing agreement being used by EROs to share data in Scotland.
3c: Raising awareness using advertising and media

2.78 Public awareness activity, such as advertising and working with the media, is an important part of public engagement. As ERO, you have a general duty to promote participation and you will need to undertake advertising of your own as far as is possible – this may be in media you already own such as local authority newsletters, websites, bus shelters, poster sites or notice boards. You will also have a number of other channels available for raising awareness, such as social media and media relations tools.

2.79 For your public engagement strategy, you should ensure that your public awareness raising activity is co-ordinated to take place at times that will best support your activities such as at key points during the canvass and in the period leading up to scheduled polls.

Getting the public to take action

2.80 The main objective of your public engagement activity is to get residents to take action.

2.81 We previously undertook research with the public, led by Ipsos Mori, to establish which communication messages best motivated and engaged people to take action. The research findings showed that the following key elements were motivating:

- ‘Voting matters’ (many people do not distinguish voting from registering)
- Loss aversion (the implication that you stand to lose something if you don’t register)

Timing

2.82 Timing of advertising activity is crucial to it having impact, and also ensuring that people don’t get so accustomed to the message that they switch off. You may want to consider limiting the use of some channels to the periods where they will have most impact and maximise the results of the other activity you are undertaking, such as partner work, community events and media relations activity.

2.83 You may want to co-ordinate advertising and other activities to peak at key points, in the canvass and in the period leading up to the next scheduled polls.

4 You can read the message testing report on our website.
Using your own media channels (owned media)

2.84 You should continue to consider the best places to display your advertising. Buying media (advertising space) such as outdoor poster sites and press advertisements can be prohibitively expensive. More inexpensive options such as community newsletters or local listings magazines may also be out of reach.

2.85 You may, however, have a range of local-authority-owned channels available to you. Where the advertisement will need printing or reproducing for the medium, the costs may still be substantial.

2.86 As part of keeping your public engagement strategy under review, you should undertake an audit of potential owned media, detailing who that media reaches, and select the combination of options that are best placed to reach your specific target audiences. You may have already completed such an audit, in which case you should ensure it remains relevant and check for any changes since it was last undertaken.

Potential owned media

2.87 The following are examples of owned media:

- Local authority residents’ magazine
- Internal staff newsletters
- Local authority-owned vehicles
- Local authority-owned poster sites
- Local authority buildings
- Bus shelters and billboards
- Notice boards

2.88 You should also use the website of your own local authority as an additional low-cost media channel. If you have not done so already, you should ensure that your web content is up-to-date and includes links on key pages to external websites, such as [www.gov.uk/register-to-vote](http://www.gov.uk/register-to-vote) and [www.yourvotematters.co.uk](http://www.yourvotematters.co.uk).

2.89 When reviewing the media that you use, you should consider the following:

- Reach – the number of people who would be exposed to the activity. You should also consider the number of relevant people who would be exposed to it in terms of any target audience the activity intends to reach.
- Frequency – the number of times people would be exposed to the activity.

2.90 For example, you could estimate the reach and frequency of a poster in a doctor’s waiting room.
Using social media
2.91 Social media channels such as Facebook, Twitter, YouTube, Google+ and others continue to provide an inexpensive opportunity to raise awareness and can be a mechanism for responding to public queries. Using your own local authority social media channels can be useful particularly in alerting stakeholders who may pass on your messages to their contacts.

2.92 By making the messages you post interesting, amusing, urgent or engaging, they are more likely to be noticed and passed between users, therefore reaching a wider audience. Posts should be made at key times, for example, at the start of the canvass, to ensure that they have maximum impact.

2.93 You could also think about how external events could provide a hook for social media activity. For example, the Commission made a series of Valentine’s Day-themed tweets on electoral registration on 14 February. To maximise reach, ongoing promotion work is required to build the numbers using your social media channels.

2.94 Social media can also offer the opportunity for you to immediately see the impact of your work. For example, you can monitor how many times a Facebook post is liked or shared, or how often a tweet is retweeted.

2.95 However, social media has limitations – for example, the public audience for your own social media channels may in many cases be limited to those who are already engaged with the local authority. Even where the audience is wider, some groups can be fairly unreceptive to messages that come from anyone other than their online contacts.

Street marketing
2.96 Street marketing involves recruiting staff or volunteers to make face-to-face contact with people, for example at an event such as a road show or at a stall in a shopping centre. It can be a useful tool for targeting under-registered groups as the information can be brought to them, rather than requiring them to seek it out.

2.97 Because it requires an immediate response, forms can be collected on the spot or facilities provided to enable applications to be made online, making the process of registration seem a lot easier. This also gives the public the opportunity to ask about anything they do not understand. You could also supply posters and leaflets to draw attention to the volunteers.

Providing reminders in the locations where residents can register instantly
2.98 It has been shown that an individual is more likely to take the action requested of them if they can do it straight away. The likelihood to act decreases over time. Think about the locations that provide an opportunity for people to register there and then - providing information at those points may have greater influence on people taking the step to register.
2.99 For example, you may want to display reminders on library computers, at job clubs where computers for CV writing are provided, or in free computing skills classes.

**Buying media (paid-for advertising)**

2.100 If you are paying for advertising space – or pooling budgets with other local authorities to buy advertising space that is mutually beneficial - you should consider the factors in the box below.

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**Essential factors in choosing media**

- **Total reach** – the number of relevant people expected to be exposed to an advertiser’s message at least once in a specified time.
- **Frequency** – the number of times a member of the audience is exposed to a message in the specified time.
- **Cost** – The cost of reaching one thousand people (CPT) or of reaching your target market (CPT-TM).

**Channels and who they reach**

- **Radio** – reaches lower income residents and young adults, as well as those in more rural areas; segmented audience can be reached by appropriate stations.
- **Online** – less useful for lower income households; reaches under-24s and students particularly through social media. Most capable of targeting specific groups.
- **Newspaper** – potential to reach lower incomes, particularly in certain titles.
- **Magazines / newsletters** – target specific local areas or community groups.
- **Advertorials** (promotional articles) for local press and websites – could be used to carry more detailed information.
- **Outdoor** – useful to reach target audiences by locating in areas with high density and passing footfall; potential to reach students; billboards and buses can provide high frequency of views.
- **Mobile advertising vans** – can deliver messages to geographic areas with high densities of your target audience.
- **Event sponsorship** – potential to reach young people and BMEs.

**Planning media buying**

You may buy individual sites from media owners, or if you have a larger budget you may work with a media buying agency who are best placed to select the best media to meet your objectives and reach target audiences.

Media is typically bought in the weeks and months before a campaign is due to go live, but you will need to hold conversations early on to establish the deadlines for buying advertising media, and for supplying artwork. There are
also likely to be technical requirements for the supply of artwork.

**What to consider when buying media**

- Consider how you plan your media spend by establishing reach and frequency. It may be better to have fewer adverts on a larger radio station than lots of adverts on a small radio station.
- Is a high reach campaign in a local newspaper running for one day better than a low reach campaign in a community magazine that lasts a month? Just because it lasts longer, it doesn’t mean that people will read it more than once.
- Think about the audience before accepting any special offers from media owners. Ask why the price is reduced – it may be that the space does not have a proven ability to reach your audience.

**Getting others to spread the message (earned media)**

2.101 As well as raising awareness through advertising, peoples’ likelihood to register will be affected by the messages they hear in the press and news media. Media relations activity provides an opportunity to get your message on the news agenda and raise the profile.

2.102 By actively working with the media, you also have greater influence on the types of messages that are carried. You may not be able to control public opinion but you can supply messages that are more likely to reassure people and reduce the potential for negative coverage that could deter people from registering. Activity to undertake may include:

- Issuing press releases ahead of key points, such as at the start of the annual canvass
- Making a well-prepared spokesperson available for radio and television interviews
- Holding publicity-generating events

**Publicity activity**

2.103 Publicity activity can help generate interest from the press and the public. You could consider holding an event or hosting a speaker that would boost awareness. Novel activities at existing community events can draw attention and you can promote them in advance. You may want to talk with other local authorities about approaches they have found successful. By notifying the press ahead of the event you can attract their attendance and achieve further media coverage.

**Accessibility and impact**

2.104 When producing your own communication materials you will need to ensure that they are clear and accessible, emphasise key messages and have a layout that supports clarity and impact. Clear and concise writing has a much higher chance of reaching as many people as possible and ensuring the recipient will understand what they need to do.
2.105 Carefully considered communications that provide information in the way the reader wants to receive it is more likely to have greater impact for a broader audience, whether busy professionals, disengaged young people or residents with lower literacy levels.

2.106 If you have not already done so, you should identify whether there is someone in your local authority who has expertise in writing for the public, plain English or website accessibility, or where possible you could undertake relevant training.

**Calls to action**

2.107 For the communications you produce that are aimed at getting people to do something, a prominent ‘call to action’ is fundamental to success. A ‘call to action’ is simply a statement that lays out what you want the audience to do next – for example, ‘register online’. Without it people won't understand what they should do, and if it is unclear or buried in other information it may well be ignored.

2.108 Calls to action should be:

- Written succinctly clearly telling people what to do
- Use active instructive language (‘Visit www.bigtown.org.uk for more information’ is better than ‘interested parties can find further relevant details at the Council’s website’)
- Visually prominent in the document - for example, in larger text, a different colour and with space around it to draw people’s attention to it

**Publicising contact details**

2.109 Not everyone will understand the communication and some people will need further help or reassurance, so contact details of where the reader can get help should be included.

For further information, see our factsheet on producing accessible communications.

**Step 4: Continuing to identify and refine tactics to reach your local target audience**

2.110 Your public engagement strategy will identify local target groups and detail how these groups can be reached. It may be that a range of approaches are required using the different channels outlined above, such as direct contact, advertising and working with partners.

2.111 It is important that you monitor and evaluate the success of your tactics to engage your target groups and consider what has worked well and what has been less successful:
How effective were your tactics during the last canvass, at scheduled polls, and in your ongoing activity to maximise registration?
Did you reach your target audience?
What can you learn from your experiences to refine your approach, or do you need to take a significantly different approach?

Our research has shown that the registration of young people and, in particular, attainers, remains a challenge for EROs and that new attainers are not being added at the same rate as in previous years. Working with schools and colleges in your area to target these potential electors should therefore be a key area of your public engagement activity.

In Scotland, you should also consider whether there are specific learning points from your experience during the last canvass and at Scottish Parliamentary and local council elections that may be useful in informing your plans for targeting 14-18 year-olds.

2.112 It might be helpful to contact other authorities with similar target groups in order to share experiences and understand what has worked for them in practice. It is also critical that you continue to review the demographics of your registration area and identify any further groups that are under-registered. For further information on monitoring and evaluating your activity, see step 5 below.

2.113 Example target audiences and opportunities for reaching them are set out below:
## Table of audiences

<table>
<thead>
<tr>
<th>Audience</th>
<th>Challenges</th>
<th>Opportunities to reach</th>
</tr>
</thead>
</table>
| Registered | Need to respond to the annual canvass  
Need to know to update details if they change | - HEFs  
- Household notification letters  
- Public information through broader audience channels such as local authority website, magazine and other communications  
- Local awareness-raising advertisements  
- Local media work |
| Not registered, including typically under-registered and harder-to-reach groups | Barriers such as transient residency, unawareness of rights, disengagement, or difficulty with registering | - HEFs and ITRs  
- Follow up with direct contact (e.g. letters, phone calls, and house-to-house canvassing/personal visits)  
- Household notification letters  
- Targeted engagement activity including direct contact, public information provision, advertising, and working with partner organisations |
<table>
<thead>
<tr>
<th>Demographic</th>
<th>Challenges</th>
<th>Opportunities to reach</th>
</tr>
</thead>
<tbody>
<tr>
<td>Young people</td>
<td>- Not reached by traditional media</td>
<td>- Peer influenced</td>
</tr>
<tr>
<td></td>
<td>- Unaware of need to register</td>
<td>- High social media users</td>
</tr>
<tr>
<td></td>
<td>- Reliant on family influences</td>
<td>- High smart phone and text message use</td>
</tr>
<tr>
<td></td>
<td>- Disengagement with politics</td>
<td>- Online registration and information</td>
</tr>
<tr>
<td></td>
<td>- Distrust of authority</td>
<td>- May be in school, college or training, providing potential communication channels</td>
</tr>
<tr>
<td></td>
<td>- Other priorities</td>
<td>Opportunity to influence the family</td>
</tr>
<tr>
<td>Students</td>
<td>- Highly transient</td>
<td>- Institution asks them to complete paperwork</td>
</tr>
<tr>
<td></td>
<td>- Disengagement with paperwork and post</td>
<td>- Grouped in halls of residence or ‘student areas’ of town</td>
</tr>
<tr>
<td></td>
<td>- Other priorities and distractions</td>
<td>- Potential to be incentivised</td>
</tr>
<tr>
<td></td>
<td>- Not used to registering themselves</td>
<td>- High social media users</td>
</tr>
<tr>
<td>Attainers (including 14/15 year olds in Scotland)</td>
<td>- Unaware of need to register</td>
<td>- Many in school, college or training, providing potential communication channels</td>
</tr>
<tr>
<td></td>
<td>- Reliant on family influences</td>
<td>- Online registration</td>
</tr>
<tr>
<td></td>
<td>- Disengagement with politics</td>
<td>- High smart phone and text message use</td>
</tr>
<tr>
<td></td>
<td>- Other priorities</td>
<td>- High social media users</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Peer influenced</td>
</tr>
<tr>
<td>Homemovers</td>
<td>- Unaware of need to re-register</td>
<td>- Partners helping to spread messages</td>
</tr>
<tr>
<td>Mobile population, private renters and communal residency</td>
<td>- Unaware of need to register/change details</td>
<td>- Partners helping to spread messages</td>
</tr>
<tr>
<td>Under-registered black and</td>
<td>- Disengagement with</td>
<td>- Partners helping to hold the lines of the family</td>
</tr>
<tr>
<td>Demographic</td>
<td>Challenges</td>
<td>Opportunities to reach</td>
</tr>
<tr>
<td>----------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>minority ethnic politics</td>
<td>New residents may be unaware of rights</td>
<td>spread messages</td>
</tr>
<tr>
<td></td>
<td>Local advertising in locations with higher density of target population</td>
<td></td>
</tr>
<tr>
<td>People with disabilities and particular communication requirements</td>
<td>Unable to access mainstream communications</td>
<td>Need to produce accessible communications</td>
</tr>
<tr>
<td></td>
<td>Some may rely on carers to receive and return post</td>
<td>High users of service providers, providing potential communication channels</td>
</tr>
<tr>
<td></td>
<td>May need help with completing forms</td>
<td>Potential to reach carers and those who have influence with them</td>
</tr>
<tr>
<td>Over 80s</td>
<td>Very low internet use</td>
<td>High users of service providers, providing potential communication channels</td>
</tr>
<tr>
<td></td>
<td>Difficulty getting to post box</td>
<td>Potential to reach carers and those who have influence with them</td>
</tr>
<tr>
<td></td>
<td>May rely on carers to receive and return post</td>
<td></td>
</tr>
<tr>
<td></td>
<td>May need help with completing forms</td>
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<tr>
<td></td>
<td>Less exposed to outdoor advertising</td>
<td></td>
</tr>
<tr>
<td>Disengaged households; young people not in employment, education or training (NEETs)</td>
<td>Disengagement with politics</td>
<td>High users of certain services providing potential communication channels</td>
</tr>
<tr>
<td></td>
<td>Distrust of authority</td>
<td>Peer influenced</td>
</tr>
<tr>
<td></td>
<td>Difficulty with completing forms</td>
<td>Potential to be incentivised</td>
</tr>
<tr>
<td></td>
<td>Not involved with institutions</td>
<td></td>
</tr>
<tr>
<td>Low level of literacy or understanding of English (or, in Wales, English or Welsh)</td>
<td>Unaware of rights</td>
<td>Provision of information in other languages</td>
</tr>
<tr>
<td></td>
<td>Difficulty completing forms</td>
<td>Partners helping to spread messages and providing help with form completion</td>
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<td>Information in world language media</td>
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<td>Homeless and travellers</td>
<td>Difficulty accessing and completing forms</td>
<td>Partners helping to spread messages and</td>
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### Demographic Challenges Opportunities to reach

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<th>Demographic</th>
<th>Challenges</th>
<th>Opportunities to reach</th>
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| Residents in very rural areas      | - Less exposure to central services  
- Less exposure to outdoor advertisements | - Partnering with community groups  
- Rural communications  
- Reliant on concentrated range of services |

We have developed example tactics sheets for reaching target audiences that focus on particular groups, such as students and young people (under 35) who remain considerably less likely to be registered. These tactics sheets can support your public engagement strategy and help you to continue to target typically under-registered groups.

#### Sharing good practice

A number of EROs liaise with universities in their area to include electoral registration in the student registration process. For information on and examples of how some EROs are encouraging students to register, see our resource 'Reaching students'.

### Step 5: Ongoing monitoring and evaluation

2.114 Although listed as step 5, monitoring of progress and evaluation should be carried out throughout your activities. This will help to ensure that your public engagement strategy is a continuously evolving document that reflects your experiences and any changing needs of your registration area.

#### Why you need to monitor and evaluate

2.115 You should monitor the delivery of your public engagement activity, as well as carry out an evaluation at the end of each key stage of registration activity to ensure that your activities are effective and remain appropriate. Your engagement strategy and registration plan will need to be updated to reflect the findings of your monitoring and evaluation.

2.116 Your strategy should outline how you will monitor and evaluate the success of your public engagement activity. Evaluations are essential for measuring the effectiveness of a project and demonstrating achievements. Evidence gathered through the process of monitoring and evaluation will enable you to make any necessary amendments to your activity in order to help you target your resources where they are most needed.
Planning monitoring and evaluation

2.117 At the planning stage of your activity, it is important to identify a mechanism for monitoring success and define the questions to be addressed by an evaluation and how these questions might be answered.

2.118 In order to evaluate the success of an activity, it is important to have clear objectives. When reviewing your public engagement strategy you should have in mind the objectives of each activity and these should be as measureable as possible. The evaluation measures you use should relate back clearly to the initial objectives.

2.119 You may not be able to evaluate everything in the detail you would like, but there are a variety of methods that can be used (see below) to assess the effectiveness of your activity. It is important to undertake evaluation as extensively as possible so that you can make best use of your resources. You should set out any limitations to the evaluation in your plans, including any potential risks to the reliability and validity of the evaluation design and the resulting findings.

2.120 The evaluation plan needs to set out who will participate in the evaluation. It should also determine who is going to be responsible for the various parts of the evaluation. Your registration plan should include details of the implementation of the engagement strategy, including evaluation of the strategy’s impact. Consideration should also be given to the resources allocated to evaluating a particular project. A satisfactory account of the effectiveness of a project cannot be given without evaluation, but the cost of the evaluation should be proportionate to the cost of the project.

2.121 The plan should also identify relevant stakeholders, such as other local authorities, who may be interested in the evaluation and who the findings should be shared with.

Available evaluation measures

2.122 A mix of indicators should be used, some of which might be behaviour-based (what people have done, what has actually happened) and some of which might be perception-based (what people believe to have happened).

2.123 When measuring the success or otherwise of public engagement activity, you should consider:

- Reach – the number of people who would have been exposed to the activity. You should also consider the number of relevant people who have been exposed it in terms of any target audience the activity intends to reach
- Frequency – the number of times people would have been exposed to the activity
- Whether there have been increases in the number of people taking action, such as registering to vote
• Whether positive feedback has been received from participants in a scheme
• Whether people’s understanding of the process has increased
• Whether there has been an increase in requests for information

2.124 It is likely that a variety of methods will be used to evaluate a project. At the planning stage it is important to think about the most appropriate methods to use for evaluation.

2.125 The following are some mechanisms for collecting evidence to support your evaluation:

• Recording feedback from the public at events or via your website
• Recording the level of responses as a result of the activity
• Recording the number of enquiries on the subject
• Recording the number of hits to the website requesting information
• Recording any feedback provided on social media
• Distributing evaluation questionnaires or feedback forms at the end of an event
• Conducting a public opinion survey to determine whether the public were aware of your activity, their thoughts about it and whether they took action as a result
• Conducting pre-activity and post-activity surveys to determine whether people’s knowledge and awareness of registration and the process has increased as a result of the activity
• Interviews with stakeholders to determine what they thought of the activity
• Focus groups held with residents to gather feedback – potentially as part of other events

2.126 So that your evaluation is as accurate as possible, it is also important to attempt to measure:

• Environmental factors or ‘background noise’: to what extent is increased participation the result of your activity or of some other factors?
• The base case: i.e. what would have happened in the absence of the activity?

To be able to achieve the outcomes set out in performance standard 1, you will need to put in place monitoring and evaluation measures to ensure the maximum effectiveness of all activities. To demonstrate how the outcomes have been met, your project planning documentation should include the objectives and success measures to be used to measure the impact of activity and the evaluation measures you have in place for all activities carried out.
3 Your registration plan and public engagement work

Why having a registration plan is important

3.1 In order to effectively deliver well-run electoral registration services, you will need to have in place robust project planning documentation that is informed by a clear understanding of the registration challenges in your area.

3.2 A public engagement strategy will help you identify the challenges and a general approach for tackling them. Your registration plan should be informed by it and capture everything that needs to be done to produce electoral registers that are as accurate and complete as possible – not just throughout the canvass period, but throughout the year.

3.3 In particular, your registration project plans should cover in detail how you will engage with residents in your area, including the sending out of forms, letters and e-mails, direct face-to-face contact by canvassers, as well as local public awareness activity such as advertising and partnership work with local organisations. See also paragraph 3.6 for what it should cover.

3.4 You will need to ensure that you keep in place systems that will enable you to chart your progress towards ensuring that as many eligible residents as possible are included on the register. This will include processes to track responses from individuals and households to allow you to monitor and evaluate progress, and to help you target resources appropriately and identify where amendments to your plans are required.

3.5 To mitigate any risks, you will also need to maintain a risk and issues register, identifying any risks to the effective delivery of your registration plan and corresponding mitigating actions.

To achieve the outcomes set out in performance standard 1, you will need to ensure that you evaluate and update your registration plan as appropriate to deliver your strategy. To demonstrate how the outcomes have been met, your overall project planning documentation, including a risk register, should be kept under regular review and include:
- Objectives and success measures to be used to monitor the impact of activity
- The resource requirements of the activity you plan to carry out
- A timetable of deliverables and tasks for year round activity
- The partnership activity you have planned
- The evaluation measures you have in place for all activities carried out
We have produced a template registration plan that you can use to support your planning for the delivery of well-run electoral registration services. You do not have to use the template we have provided but, whatever form your plan takes, you should ensure that it captures all the work that you will need to undertake throughout the canvass and across the rest of the year, including in the period leading up to scheduled polls, including how you will implement the actions identified in your local public engagement strategy. At a minimum, your registration plan should cover the areas included in paragraph 3.6 below.

Your planning documentation should be set out in a way that captures:

- objectives and success measures
- resource requirements
- key deliverables and tasks, with start and end dates, as well as owners
- dependencies and relevant partners
- mechanisms for tracking and evaluating progress and for recording amendments to the plan

You should also cover the risks which will need to be managed to ensure effective delivery of your registration plan. We have developed a template risk and issues register which contains examples of risks that you will need to consider and, if necessary, mitigate, as well as a log on which to record any issues that have emerged and that you will need to address. You can use our template risks and issues register for recording all your risks; alternatively, you may wish to include the example risks in any pre-existing risk management documentation you have already developed.

A number of EROs have identified tools to assist in managing registration processes. For information on and examples of utilising management tools, see our resource ‘Effective management of registration processes’.

What your registration plan should cover

3.6 Your registration plan should reflect your approach to the canvass and to managing registration activity over the rest of the year, including your ongoing work to maximise registration. Your plan should cover:

- Mechanisms for monitoring and evaluating your progress with delivering your plan and for recording amendments
- Key individuals and partners who will support you in delivering the registration plan
- Identification of the required resources, including identification of staffing requirements and any necessary recruitment arrangements; the
management of contractors and suppliers, including printers and software suppliers; and storage requirements

- Review of internal processes to ensure they remain relevant, including security of personal data and what measures have been put in place to ensure data protection requirements will be managed
- Identification of training needs, incorporating external and internal sources of training
- Implementation of the public engagement strategy, including how direct contact with electors will be managed
- Details of how the necessary steps as set out in Section 9A of the Representation of the People Act 1983 will be carried out
- Processes to identify any patterns of activity that might indicate potential integrity problems, including what steps are to be taken to deal with any such problems

In Scotland, your plans will need to include the detail of how you will implement your strategy for engaging with 14-17 year-olds in your area.

Your plans will also need to reflect how you will manage the different processes you are required to follow to verify the identity of 14 and 15 year olds, including how you will access and use educational records and any other records for these purposes.

Mechanisms for monitoring and evaluating your progress

3.7 It is important that you treat your registration plan and public engagement strategy as ‘living documents’ and keep them under regular review to ensure they remain appropriate, using available data to monitor progress and to identify where any amendments need to be made. Paragraph 2.114 above provides further guidance on keeping your public engagement strategy under review.

Support to deliver your registration plan

3.8 You should consider which key departments and individuals you will need to involve, such as:

- the local authority’s IT department
- the local authority’s finance team
- data holders
- the data protection officer at the local authority
- the local authority’s call centre / reception manager
- the communications / media manager at the local authority (if there is one)
- the local authority’s HR manager
- representatives of local authority teams/individuals and local organisations who work with under-registered groups in your area, such as local education departments
3.9 Your plan should cover how you will be engaging with these departments/individuals and how often you will meet with them. You will also need to consider:

- whether you should personally chair the group
- who should be involved
- what the terms of reference will be
- how actions will be recorded and taken forward

Identifying the required resources

3.10 Your public engagement strategy will identify what work you need to do to engage with residents in your area and, consequently, what resources you will need to do this. Keeping your plan under review and evaluating your activity will enable you to understand whether your local challenges are being met and enable you to target your resources where they are most needed.

3.11 You should:

- Check that your resource assumptions are robust and that you have sufficient funding to cover the activities you have identified that you need to carry out.
- Review your current staffing structure in light of your experiences over the last year to identify whether it remains appropriate or if you need to make any changes.
- Review the management of contractors and suppliers: ensure that your IT systems and printing arrangements continue to be effective and that you have all the necessary equipment in place. You should also ensure that you have a written agreement or contract in place when using a contractor or supplier.
- Ensure that your storage requirements are adequate and that appropriate security measures are in place to protect personal data. You should review your processes with advice from your data protection officer and information management/IT departments. They will be able to help you identify any risks to the security of the data you hold, whether on paper or stored electronically on your systems. You will also need to maintain a document retention policy, which will help demonstrate that you are complying with the principles of processing personal data, ensuring that it is processed lawfully, fairly and in a transparent manner.

Section 7 ‘Using contractors and suppliers’ of our resource on the EU General Data Protection Regulation and the Data Protection Act 2018 highlights the requirement to have a written agreement or contract in place when using a processor (i.e. a contractor or supplier), together with the requirements for appointing a ‘processor’.
Section 5 ‘Document retention’ and Section 6 ‘Data storage’ contain further advice on storage and retention of documents and also on maintaining your document retention policy, including what it should contain.

To be able to achieve the outcomes set out in performance standard 1, you will need to review the resources available to you, taking into consideration:

- the activities required and the ownership of these
- the timescales within which they need to be carried out
- opportunities in the electoral calendar to maximise registration

To demonstrate how the outcomes have been met, your overall project planning documentation should include the resource requirements of the activity you plan to carry out.

In Scotland, you should review your resources in light of your experiences at the last canvass and at scheduled polls to see whether you need any additional resources, including staffing resources, to process applications from 14-16 year-olds.

You should also liaise with your local education services department to obtain data that will help to refine your assumptions further. If you have not already done so, you should consider developing a data sharing agreement to facilitate the secure and timely sharing of data.

**Staffing**

3.12 You should review your staffing levels in light of your experiences to date to ensure that they remain sufficient. Where you identify that recruitment is necessary, you will need to consider the length of time recruitment takes and plan appropriately. You should liaise with your HR contact at the local authority to ensure they are aware of your requirements and can provide you with the necessary support.

**IT**

3.13 You will already have IT in place to support you with managing registration processes. You should review your arrangements and consider what, if anything, may need to be revised in preparation for the canvass and future electoral events.

**Printing**

3.14 You should discuss with your printers the number of HEFs and ITRs that you expect you will require taking account of your experiences during the last canvass.
3.15 Irrespective of whether you decide to print in-house or are using an external printer, you should satisfy yourself that your chosen printer will be able to cope with the complexity and volume of forms. It will be for you to decide what works best for you taking account of your local circumstances.

3.16 When appointing a contractor or supplier you must ensure that they can provide sufficient guarantees that the requirements of data protection legislation will be met. You should ensure that data protection is integral in any tender exercise (documenting your decision-making process) and that specific requirements are met in any contract awarded.

Section 7 Using contractors and suppliers’ of our resource on EU General Data Protection Regulation and Data Protection Act 2018 contains the specific requirements which a written agreement must include in order that the requirements of data protection legislation will be met.

Revised versions of the prescribed blank and pre-printed HEFs and of the ITR and voter registration form are available on our website, along with guidance on how to use them.

Versions of the ITR and HEF for use in Scotland reflect the fact that the franchise for Scottish Parliamentary and local government elections includes 16 and 17 year olds. You should ensure that your printers are using the latest versions of the forms and letters. Your experiences at the last canvass will provide a good starting point for developing estimates of the number of forms you will require, which should be refined by taking into account any other local data you may hold or have access to.

3.17 Based on the volumes of forms you are likely to send out, you could also review your bulk postage products and discounts.

We have produced guidance on managing contractors and suppliers, which provides further information on procurement processes and managing relationships with suppliers.

Storage

3.18 In light of your experiences during the last canvass you will need to review your storage requirements – both physical and electronic - to ensure you have sufficient space.

3.19 In particular, you should review the volume of paper and electronic applications that you have received, and the volume of documentary evidence you have received where an applicant could not be verified, in order to identify whether your current arrangements remain appropriate. You should also keep under review your arrangements for retrieving the data when it is due for destruction, as well as any security requirements to ensure that electors'
personal data is kept safe. In reviewing your physical storage requirements you will need to take into account the levels of electors who have chosen to apply online instead of submitting a paper form.

3.20 Your document retention policy will help you to demonstrate that you are complying with the principles of processing personal data, ensuring that it is processed lawfully, fairly and in a transparent manner.

3.21 Your document retention policy should set out the following for all documents you receive and hold:

- whether the document contains personal data
- the lawful basis on which any personal data was collected (see ‘Lawful basis for processing’)
- your retention period
- your rationale for the retention period (which might relate to a requirement in electoral law, for example, home address forms at UK Parliamentary elections must be destroyed after 21 days)

Further guidance on the retention of documents can be found in Part 4: 'Maintaining the register throughout the year' and Section 5 of our resource on the EU General Data Protection Regulation and the Data Protection Act 2018.

Reviewing internal processes to ensure they remain relevant

3.22 Building on your experiences during the last canvass, you should undertake a run-through of the processes you will be expected to undertake during the next canvass, including the sending out and receipt of HEFs, the issuing and receipt of ITRs and undertaking follow-up activity where required, including undertaking personal visits.

We have produced a summary sheet on sending HEFs and on writing to new electors, which you can use as a reference for identifying what follow-up processes and types of documents need to be sent and when.

3.23 A run-through of your processes will allow you to test whether your processes are working, identify what could be further refined and highlight any issues. It will also enable you to assess, based on the time spent dealing with incoming and outgoing post, the processing of applications and data entry, whether your resources are adequate. For example, the exercise could highlight the need for more staff, extra training or additional equipment.

Security of personal data

3.24 You will be collecting data from residents, including personal data such as a person’s date of birth, nationality and their National Insurance Number.
3.25 As ERO, you are a data controller and have a statutory responsibility under data protection legislation to ensure that personal data is kept securely. Any breach could constitute an offence and could result in a loss of confidence in the electoral registration process.

3.26 Good data handling practices therefore need to be part of your day-to-day business processes. For example, you will need to review how you are managing the large volumes of data and the security of personal data.

In Scotland, staff will need to be given appropriate training and guidance relating to handling and storing the personal data of 14 and 15 year-olds.

Subject to limited exceptions, only EROs and their staff will be able to use the data relating to these individuals. The Returning Officer at a Scottish Parliamentary or local government election will have access to the data relating to those 15 year-olds who will attain voting age on or before polling day. A young person's data may also be disclosed to the young person themselves, and in certain other prescribed circumstances. For further guidance on access to the information included in the electoral register, see Chapter 12 of Part 4: 'Maintaining the register throughout the year'.

3.27 Your local authority will have corporate standards and processes for data handling and security and you should review your processes with advice from your Information Compliance/Data Protection Office and IT about maintaining effective data handling. They will be able to help you identify any risks to the security of the data you hold, whether on paper forms or stored electronically on your systems. You will need to ensure that your handling procedures and storage arrangements are compliant with data protection legislation.

Further detailed guidance on data protection legislation is contained in our resource on the EU General Data Protection Regulation and the Data Protection Act 2018.

3.28 You can find guidance on data protection on the Information Commissioner's website, or you can contact the Information Commissioner's Office should you have any specific questions.

In England:
The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: 0303 123 1113
Fax: 01625 524510
Email: casework@ico.org.uk
In Scotland:
Information Commissioner’s Office – Scotland
45 Melville Street
Edinburgh
EH3 7HL
Tel: 0303 123 1115
Email: scotland@ico.org.uk

In Wales:
Information Commissioner’s Office – Wales
2nd Floor, Churchill House
Churchill Way
Cardiff
CF10 2HH
Tel: 029 2067 8400
Email: wales@ico.org.uk

3.29 The Local Government Association/SOCITM have also produced guidance to local authorities on data handling (although it should be noted that the ERO is a separate data controller from the local authority). It recommends that you consider the following factors when developing your approach to data handling and these can be considered again as part of your review:

- **Policy:** comprehensive policies (including business continuity, and home and mobile working) should form the information governance regime. The policies should be monitored and audited to ensure they are being effectively enacted
- **People:** including staff awareness and training, users access, and mechanisms for managing information risks
- **Places:** including risk assessments, security of buildings and premises, the disposal of information, and use of removable media
- **Processes:** including who can access data, system security, transfer of data, and supplier and contractor data processes
- **Procedures:** including risk reporting, auditing procedures, and documented policies and procedures

**Reviewing training needs, incorporating external and internal sources of training**

3.30 You should review the skills and knowledge available within the electoral registration office and ensure that all staff are appropriately trained.

3.31 Your registration plan should cover identifying the training needs of both permanent and temporary staff, including canvassers. It continues to be vital that each member of the team, whether permanent or temporary, understands their particular role and any statutory obligations associated with the work they are undertaking. All staff should receive training on the legislative requirements and
responsibilities relevant to their role, as well as training on ensuring equal access, data handling and good customer care.

3.32 You will need to ensure that everyone handling personal data is aware of and is adequately trained in the legal requirements for handling personal data in line with data protection legislation. Data protection training will help you to embed the data protection principles in your work and demonstrate compliance with data protection legislation. You should discuss any data protection training with your council's Data Protection Officer.

3.33 You should review your training needs analysis, and consider whether your experiences to date have highlighted any areas where your staff need additional training. Similarly, you should review and evaluate the training you have previously provided, and refine the training sessions and materials to ensure they are relevant and appropriate for future sessions. If you have training personnel within your local authority they may be able to assist you with this process.

3.34 References to training in your plan should incorporate external and internal sources of training.

To meet the outcomes set out in performance standard 1, you will need to ensure the training requirements of the different staff involved in delivery are met. To demonstrate how the outcomes have been met, your overall project planning documentation should cover the identification of training needs and the delivery of any required training.

Further guidance on the recruitment and training of staff is contained in Part 3: Canvass.

In Scotland, you will need to identify any specific training needs relating to the verification processes for 14 and 15 year olds so that staff are able to administer them effectively. Staff will also need to be aware of and receive any training that is necessary to apply the restrictions the legislation imposes on disclosing information relating to those who are under 16 years old.

Implementation of the public engagement strategy

3.35 Your registration plan should include details of how you are going to put your public engagement strategy into practice, i.e. how you will manage direct contact with electors, and how you are going to monitor its effectiveness. You should allocate tasks to specific individuals, set deadlines and have a mechanism for tracking and evaluating progress, all of which should be reflected in your plan. For example, you should plan to review your strategy in advance of the canvass and again once it has concluded to support your ongoing activity to maximise registration throughout the year.
To meet the outcomes set out in performance standard 1, you will need to plan activities with the internal and external partners you have identified as being helpful to meeting the challenge in the area. In order to demonstrate how you have met the outcomes, your overall planning documentation should include a timetable of deliverables and tasks for year round activity and details of the partnership activity that you have planned.

**How the necessary steps under Section 9A of the RPA 1983 will be carried out**

3.36 You should continue to take all necessary steps to ensure that your registers are as accurate and complete as possible, including carrying out house-to-house enquiries and personal visits and using available local data to identify and target potential electors and to verify and validate data held on your register.

3.37 Details of how you intend to carry out the necessary steps under Section 9A, both during the canvass and throughout the year, should be covered in your registration plan.

3.38 Your plan should also capture how you are going to identify and remove any electors who no longer qualify to be registered. You should ensure that you are making full use of all the records available to you to check entries on the register, taking steps to remove those electors who are no longer entitled to remain registered.

To achieve the outcomes set out in performance standard 2, you will need to use information sources available to identify existing electors who may no longer be eligible and ensure that all necessary steps are taken to remove that elector from the register. To demonstrate how the outcomes have been met you should record the number of electors removed from the register and the reason for the removal.

In addition, you will need to use information sources available to identify and target new electors, and ensure that all necessary steps are taken to add them to the register. To demonstrate how the outcomes have been met, you should record the number of electors added to the register and how these applications originated. For example, whether the application was unsolicited or was it following information included in a HEF.

While the Section 9A duty to take all necessary steps to ensure your registers are accurate and complete still applies, the requirement to carry out house-to-house enquiries has not been extended to 14 and 15 year olds.

You should consider what mechanisms you can use to encourage a response from those in this age group. For example, you could contact under 16s by email if you hold their email address. Also, as part of any canvass follow-up activity,
there may be an opportunity to remind any adults living at an address that 15 year-olds and some 14 year-olds are entitled to register and to ask them to encourage any 14/15 year olds at the address to apply to register online.

You should also work with partners that specifically work or have influence with young people and reflect this in your plans. We have provided specific guidance on engaging with young people and attainers in our example tactics sheet for reaching target audiences.

**Processes to identify any patterns of activity that might indicate potential integrity problems**

3.39 You will need to have in place plans and processes to identify any patterns of activity that might indicate potential integrity problems. Your plans should include specific steps to identify any potential integrity problems and set out what steps are to be taken to deal with any such problems.

To meet the outcomes set out in performance standard 1, you will need to develop and maintain processes to identify any patterns of activity that might indicate potential integrity problems, including what steps are to be taken to deal with any such problems. To demonstrate how the outcomes have been met, your planning documentation should clearly address potential integrity issues, how they would be identified and the actions to be taken in each case.

Guidance on the processes to identify patterns of activity that might indicate potential integrity problems is included in Part 4: Maintaining the register throughout the year.