

The
Electoral
Commission

Guidance for Electoral Registration Officers

Part 3 – Annual Canvass

June 2018



SAA

Scottish Assessors Association

Updates to this document

Updated	Description of change
September 2013	Original publication
May 2015	Updated for the 2015 canvass and the period leading up to the May 2016 polls
July 2015	Revised for Scotland to reflect The Scottish Elections (Reduction of Voting Age) Act 2015. This change applies to any elections in Scotland that use the local government register (and only the local government register) for the purpose of determining the franchise.
November 2015	Revised to reflect the end of the transition being brought forward to December 2015
July 2016	Updated for the 2016 canvass; to remove references to electors who are not registered individually; to reflect the new performance standards; and to reflect the Representation of the People (England and Wales) (Amendment) Regulations 2016
June 2017	Updated for the 2017 canvass; to include legal references and make minor consequential amends; to reflect the transfer of functions from the Chancellor of the Duchy of Lancaster to the Minister for the Cabinet Office; ⁱ to incorporate guidance previously issued in Bulletins on elections during the canvass period (Chapter 2) timing of the publication of the revised register (Chapter 5) and elections taking place immediately after publication of the revised register (Chapter 5); to reflect the Representation of the People (Scotland) (Amendment) Regulations 2017; and to add in links to examples of good practice in electoral registration.
March 2018	<p>Updated:</p> <ul style="list-style-type: none"> • for the 2018 canvass • to take account of the EU General Data Protection Regulation (GDPR) (effective from 25 May 2018) and the Data Protection Bill • to reflect the Combined Authorities (Mayoral Elections) (Amendment) Order 2017 which provide that in keeping with other elections, a subscriber must appear on the relevant register in force on the last day for the delivery of nominations rather than

ⁱ [The Transfer of Functions \(Elections, Referendums, Third Sector and Information\) Order 2016](#)

	at the time the nomination is delivered (footnotes, which reflected the previous position, removed at paragraphs 2.72 , 5.27 and 5.33)
June 2018	Updated to reflect 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 which broaden the circumstances when a person may be removed from the register based on one piece of evidence (effective from 1 July 2018)

Contents

1	About this guidance	1
2	Planning for the canvass	3
	Reviewing and updating your public engagement strategy and registration plans	4
	Managing contractors and suppliers	6
	Preparing your register for the canvass	7
	Reviewing your address database	8
	Timing considerations for 2018.....	8
	Delivery of HEFs and ITRs	9
	Delivery by post.....	9
	Delivery by canvassers	10
	Delivery by email.....	10
	Planning for the required follow-up processes during the canvass	11
	Canvass areas or 'rounds'	12
	Recruitment and training of staff	13
	Recruitment of canvassers.....	13
	Training of canvassers	14
	Recruitment and training of front-line staff.....	14
	Elections during the canvass	15
	Targeting electors	16
	Register to be used for elections taking place during the canvass.....	18
3	What to send and when.....	20
	Forms to be sent during the canvass.....	20
	The HEF	22
	Pre-printed HEFs	23
	Blank HEFs	24
	The covering letter	24
	Reply envelope.....	25
4	Responses to HEFs	26
	Response mechanisms	26
	Declaration of truth.....	26

Processing HEF responses	27
No changes	27
Names of existing registered electors crossed off	27
Additions	30
Changes to existing electors' details	31
Request for changes to absent vote and open register choices.....	33
Deletions arising from information on a HEF	35
Follow up processes where no response is received.....	36
'Reminder' HEFs	37
Making at least one visit.....	37
Penalty for failure to respond to a HEF or providing false information	39
5 Publication of the register.....	40
Monthly notices of alteration	40
Timing of publication of the revised register	40
Content of the revised register.....	42
The full register	43
The edited register	44
Format of the register	45
Register markers.....	46
Communications following the publication of the revised register.....	48
Register to be used for elections taking place after publication of the revised register.....	48
Poll cards at a December election.....	49
Which register is a December election run on?.....	50
Elections where the final election notice of alteration is published before the revised register.....	50
6 After publication	52
Data	52
RPF 29	52
Access and supply.....	53

1 About this guidance

1.1 This is part three of the comprehensive guidance produced to support Electoral Registration Officers (EROs) in planning for and delivering well-run electoral registration services. It should be read in conjunction with [Part 4: 'Maintaining the register throughout the year'](#), which is cross-referenced at relevant places throughout this Part.

1.2 The guidance is directed towards the ERO and the duties they carry out. As these duties may, in practice, be carried out by deputies and/or appointed staff, we use the term 'you' throughout this guidance to mean the ERO and whoever is carrying out the ERO's functions on their behalf. Throughout this document we use 'must' to refer to a specific legal requirement and 'may / should' for recommended practice.

1.3 It 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, the AEA, SOLACE, 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.

1.4 The guidance is based on the legislation listed in paragraph 1.8 of [Part 1: Planning for the delivery of electoral registration activity](#). 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. Legislative references are included throughout the guidance as endnotes. As there are two versions of the Representation of the People Regulations 2001: one for England and Wales, and one for Scotland; both versions of the legislation are referenced. For example, "Regulation 26(1)(j) 2001 Regulations, RPR (Scotland) 2001" is referring to Regulation 26(1)(j) in both the England and Wales version and the Scotland version of the 2001 Regulations.

1.5 Following the canvass pilots that have taken place in 2016 and 2017 due to under the Electoral Registration Pilot Scheme (England and Wales) Order 2017, the Electoral Registration Pilot Scheme (Scotland) Order 2017, and the Electoral Registration Pilot Scheme (England) (Amendment) Order 2017 which allowed differences in approach to the canvass to be permitted in specified areas, there are no pilots taking place in 2018. EROs who have been part of these pilots will therefore need to conduct a full canvass for 2018 in line with all legislation referenced in this guidance.

1.6 You will find references to the [performance standards framework](#) embedded throughout the guidance. 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.

1.7 Our guidance, tools and templates, along with support provided by our teams across England, Scotland and Wales, will continue to help you to plan for and deliver well-run electoral registration services. The tools and templates we have made available are highlighted in break-out boxes throughout the guidance.



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.

2 Planning for the canvass

2.1 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.

2.2 Your public engagement strategy should identify your challenges and an approach for tackling them. Your registration plans should be informed by your engagement strategy and capture everything that needs to be done throughout the canvass and over the remainder of the year, including in the period leading up to any scheduled polls, in order to be able to produce electoral registers that are as accurate and complete as possible.

2.3 The canvass involves the following:

- Household enquiry forms (HEFs) will need to be sent to all households¹ and you will need to send invitations to register (ITRs) to those who have been added to a HEF², as well as follow up with any HEF and ITR non-responders.³
- Where the name of an existing elector is crossed off a HEF, you will use this as a prompt to check that person's entitlement to remain registered.



The prescribed blank and pre-printed HEFs and the ITR and voter registration form that you must use are available on our [website](#). Our suite of voter registration forms are currently being updated to provide revised data messaging in light of data protection legislation. Updated versions will be available on our website in advance of the legislation coming into force.

Our forms and letters guidance sets out which parts of the HEF (and other electoral registration forms) must be used exactly as provided and which parts can be customised. The [forms](#) and [letters](#) guidance for England and Wales, and the [forms](#) and [letters](#) guidance for Scotland is available for download on our [website](#)

2.4 EROs are not required to send a HEF to a particular address in specific prescribed circumstances:

- During the canvass, an ERO is no longer legally required to send a HEF to an address (or carry out the follow-up processes if a HEF has already been sent) if they have successfully determined a registration application for that address and the applicant has indicated that they are the only person resident aged 16 or over (14 or over in Scotland).⁴

- Outside the canvass, where an ERO has successfully determined a registration application for an address and the applicant has indicated that they are the only person resident aged 16 or over (14 or over in Scotland), the ERO is not required by law to send a HEF as part of the next annual canvass.⁵



Further detailed guidance on the specific prescribed circumstances where an ERO is not required to send a HEF to a particular address is contained in **Chapter 3 - What to send and when**.



In Scotland, the local government register will include 16 and 17 year olds as full electors. Additionally, 15 year olds and some 14 year olds are entitled to be included on the local government register as ‘attainers’. For the purposes of the local government register in Scotland, an attainer is someone who turns 16 by the end of the twelve months following the 1 December after the ‘relevant date’ (see Chapter 3 of [Part 2: Registration framework](#) for more information on the ‘relevant date’).

In Scotland, the HEF will therefore collect information on those aged 14 and over, and eligible 14 and 15 year olds who are added to the HEF (i.e. those who will turn 16 by the end of the twelve months following the 1 December after the ‘relevant date’) will need to be sent an invitation to register.

2.5 The learning from your experience of administering the 2017 canvass, including sending out HEFs and ITRs and completing the necessary follow-up processes, will be invaluable in informing your plans setting out how the 2018 canvass can be successfully delivered.

Reviewing and updating your public engagement strategy and registration plans



General guidance on reviewing and updating your public engagement strategy and registration plans is contained in [Part 1: Planning for the delivery of electoral registration activity](#). This section covers considerations that are specific to preparing for the 2018 canvass.

2.6 You will have been keeping your public engagement strategy under review and evaluating the success of the activity you’ve carried out to date. Before the 2018 canvass, you should take the opportunity to carry out a full review of your strategy, reflecting on your experiences at the 2017 canvass and at scheduled polls, and identify what has and hasn’t worked well, before deciding on an action plan for the canvass and beyond. This will help you to target your resources where they are most needed. Existing partners may be able to give you

feedback on how your strategy has worked in practice and may also be able to provide you with suggestions about which areas or demographics may need to be targeted in the canvass period and how this could be done.

2.7 Your detailed registration plans should reflect your strategy for engaging with the public and raising awareness of the canvass to encourage those who receive a HEF and/or an ITR to respond. The clearer the message and ‘call to action’, the greater the likelihood that people will respond, which in turn will help to ensure that the revised register you publish is as accurate and complete as possible. By providing clear messages to the public, you will also help to minimise the number of enquiries received from residents, thus freeing up staff time to deal with the administration of the canvass.

2.8 Your plans should cover how you will engage with residents during the canvass through direct contact, local advertising and working with internal and external partners, including community groups that could promote registration. You should also consider collaborating with neighbouring authorities with similar challenges to avoid duplicating work and to pool resources.



In Scotland, your public engagement strategy will need to include how you will identify and target eligible 14 and 15 year olds, reflecting the fact that they are able to apply to be registered as attainers on the local government register. Your experiences during the 2017 canvass and in the period leading up to the 2016 Scottish Parliamentary elections and 2017 local council elections should inform your approach.

2.9 You should review your registration plans in light of your experiences during the 2017 canvass, assessing whether you have sufficient resources, including canvasser numbers, to carry out the necessary processes effectively. Your plans will also need to cover practical considerations to help you deliver your engagement strategy, such as:

- your printing requirements, including the number of HEFs and ITRs you will need
- your IT requirements



Guidance on reviewing and updating your registration plans is contained in [Part 1: Planning for the delivery of electoral registration activity](#).

[Part 1: Planning for the delivery of electoral registration activity](#) also includes guidance on producing clear communications that have an impact and contains a number of links to tactics factsheets for targeting and communicating with under-registered groups, such as young people, students and private renters.

You can also draw on our resources and templates for your communications. These have been produced by us following testing and have been designed with impact and accessibility in mind. All the templates are available on our [website](#).

The Cabinet Office has also made available a range of democratic engagement resources for different groups of people and settings. They have been developed in collaboration with a number of national organisations. You can view their resources here: <https://www.gov.uk/government/collections/democratic-engagement-resources>.



Sharing good practice

For information on and examples of utilising management tools, see our resource 'Effective management of registration processes'.

Information on and examples of communication methods adopted by some EROs to motivate and engage people to take action can be found in our resource '[Communications](#)'. In addition, examples of working with specific groups can be found in our resources, '[Reaching students](#)' and '[Reaching care home residents](#)'.

Managing contractors and suppliers

2.10 Your plans will also need to demonstrate that you comply with the principles of processing personal data, ensuring that it is processed lawfully, fairly and in a transparent manner. This includes where a contractor or supplier is processing personal data on your behalf.

2.11 For example, if you are using a contractor or supplier to produce HEFs, any automated HEF response service, or ITRs you are using a **'processor'** to process personal data on your behalf. Whenever you use a **'processor'**, data protection legislation imposes a legal obligation to formalise the working relationship in a written agreement or contract which sets out:

- the subject matter, nature and purpose of the processing;
- the obligations and rights of the data controller;
- duration of the processing; and
- the types of personal data and categories of data subjects

2.12 In addition data protection legislation requires that the contract must set out specific obligations on the processor, including that they:

- comply with your instructions
- are subject to a duty of confidentiality
- keep personal data secure and notify you of any breach
- maintain written records of the processing activities they carry out for you
- only use a sub-processor with your consent

- submit to audits and inspections and provide you with whatever information you need to ensure data protection legislation compliance
- delete or return all personal data to you as requested at the end of the contract



[Our resource](#) on the EU General Data Protection Regulation and the Data Protection Act 2018 also highlights the importance of having a robust proof checking process in place when working with a processor in order to detect any errors and avoid data breaches before they occur.

We have produced a [proof checking factsheet](#) which you can use to help quality assure your processes. We have also produced a [contract development checklist](#) to support you in your work with contractors/suppliers.

Preparing your register for the canvass

2.13 You have a duty to maintain the register.⁶ To ensure that your register is as accurate and complete as possible, you should check, as far as is reasonably practicable, that those who are registered remain entitled to be registered at an address.

2.14 You should ensure that you have access to all available local records. The run-up to the canvass presents an opportunity for you to carry out checks of records available to you to help you to determine whether electors remain entitled to be registered. Such checks will help you to ensure that you are conducting the canvass on the most up-to-date information available.



Sharing good practice

Information on and examples of how some EROs are utilising existing data sources to help ensure that registers are as accurate and complete as possible, can be found in our resource '[Effective use of available data](#)'.

2.15 If a check of the records of your own council, (including the county council if you are an ERO for a district council in a two-tier area) or of a person or organisation providing services to your council, indicates that an elector is deceased, you may automatically delete that entry from the register if you are satisfied that the elector is deceased.⁷

2.16 If a check of any local records indicates that an elector is no longer living at an address and they are not recorded as deceased, you will have **one** of the two sources of evidence required before you can delete the entry from the register without a registration review.

2.17 You may also have access to information relating to the administration of the May 2018 polls or a recent by-election, which may suggest that someone is no longer entitled to be registered at a particular address and which could provide you with one of the required sources of evidence. If you are not also the Returning Officer, you should liaise with them now to ensure that you are provided with information on electoral stationery that has been returned as undelivered (for example, poll cards).

2.18 If you already have one source of evidence, and the HEF is then returned during the canvass with their name crossed off because they are no longer resident, this could provide you with the required second source of evidence. If you determine that this particular elector is no longer entitled to remain registered, you will be able to delete them from the register.

2.19 Alternatively, if your local records indicate that an elector is no longer resident, you could undertake a review of that elector's entitlement to remain registered before the canvass.



Guidance on HEFs returned with the names of existing registered electors crossed off or information that may lead to a deletion, is contained in paragraphs **4.11** to **4.16** and paragraphs **4.46** to **4.53**.

Detailed guidance on deletions and on administering registration reviews is contained in Chapters 9 and 10 of [Part 4: Maintaining the register throughout the year](#).

Reviewing your address database

2.20 You should also take steps to ensure that your address database remains up-to-date. Each address should have a unique property reference number (UPRN) and you should liaise with the Local Land and Property Gazetteer (LLPG) team in England and Wales or the Corporate Address Gazetteer (CAG) team in Scotland to ensure that UPRNs are attached to each property in your area.

Timing considerations for 2018

2.21 1 December 2018 is a Saturday. Unless there has been an election during the canvass, EROs in England, Scotland and Wales should where practicable publish their revised register on Saturday 1 December.

2.22 Publication of the register on Saturday 1 December 2018 maximises the length of time available for applications to register to be received and determined in time to be included on the revised register. The determination date will be Friday 30 November (29 November in Scotland) and the last date for the receipt of normal applications will be Thursday 22 November (21 November in Scotland).

2.23 As Saturday is normally not a working day, there may be practicalities associated with you publishing the register on a Saturday. You will need to factor into your planning the possible resource requirements related to working on a Saturday, such as opening of office buildings, staffing arrangements and the availability of IT support if required.

2.24 If, for whatever reason, you decide to publish in November you will need to consider the impact on the canvass of deadlines for receipt of applications in time for them to be included on the revised register. Publication of the revised register in November means that an individual who makes a successful registration application after 23 October, would not be added to the register until the January 2019 notice of alteration, except in the case of an election.

Delivery of HEFs and ITRs

2.25 One of the issues that EROs will need to consider when drawing up their canvass plan is how HEFs and ITRs will be delivered. You should ensure that you consider the delivery methods that you will use – taking into account your experiences at the 2017 canvass – when reviewing your engagement strategy and reflect this in your registration plans. You should also consider whether you will have a specific strategy and delivery arrangements for particular properties such as Houses in Multiple Occupation (HMOs), large educational establishments and care homes – you could, for example, consider whether it would be more effective for these establishments to be visited at the outset by an experienced canvasser rather than sending a form to these addresses.



Sharing good practice

A number of EROs separate care homes from their other canvassing activity and engage with them on an individual basis to ensure care home residents are correctly registered. For more information on how some EROs are managing this in practice, see our resource '[Reaching care home residents](#)'.

Delivery by post

2.26 A large number of EROs use postal services to deliver their initial and reminder forms (if required).

2.27 The availability of discounts from Royal Mail and other service providers means that it may be more cost effective to deliver initial forms and the subsequent reminders by post than to employ canvassers to do so.

2.28 The performance of a postal service is, however, outside the direct control of the ERO. Furthermore, changes in property status will not be collected and notified to the ERO by postal service providers.

2.29 If you decide to utilise Royal Mail or any other postal service providers you should engage with them early in the planning process.

Delivery by canvassers

2.30 Canvassers can also be used to hand deliver the initial and subsequent reminder forms. This has the advantage that canvassers can become familiar with their canvass area before making contact with residents during the course of house-to-house enquiries and personal visits.

2.31 The use of canvassers to deliver forms may be time consuming for EROs, as canvassers have to be recruited, trained and supervised. Also, this may be more expensive than using a postal service, as any opportunity to receive discounts is lost.

2.32 You will need to decide which method best suits your area and enable you to fulfil your responsibilities under the legislation. Your decision may well be dictated by social or geographic circumstances: for example, sparsely populated rural areas might suit a postal delivery, whereas densely populated urban areas might be better suited to hand delivery. In each case a freepost envelope must be included for its return.⁸

Delivery by email

2.33 HEFs must be issued in a paper form in the prescribed format and cannot be sent by email or by any other electronic means. However, you can give an invitation to register by electronic means, including by email.⁹ This means that rather than sending potential electors a hard copy 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. You will need to liaise with your software supplier to ensure that you can collate and use email addresses in order to utilise this option effectively. You should also identify how you will ensure that paper ITRs are sent where an email ITR is returned as 'undelivered'.



The email invitation to register for England and Wales, and for Scotland, that you must use is included in the 'letters' folder available on our [website](#).



Sharing good practice

The earlier in the HEF or ITR process a household or individual responds, the less resource intensive this is for the ERO. For examples of how some EROs are utilising their registration stationery and materials to encourage a response as early as possible, see our resource: ['Encouraging responses'](#).

Planning for the required follow-up processes during the canvass

2.34 You are legally required to take specified steps to follow up any HEF non-responses, including issuing two reminders and making a personal visit.¹⁰ Any potential new electors identified will also need to be sent an ITR and a registration application form, and you will need to take the specified steps – issuing two reminders and a personal visit – to follow up with any ITR non-responders.

 To meet [performance standard 2](#), you will need to ensure a full and effective canvass of properties is carried out including making personal visits by trained canvassers where voter registration material has not been responded to. To demonstrate how the outcomes have been met, your overall project planning documentation should include:

- The objectives and success measures
- A timetable of deliverables and tasks for the canvass
- The resource requirements
- The identification of training needs and the delivery of any required training
- The evaluation measures you have in place for all activities carried out

 **Sharing good practice**
For information on and examples of methods adopted by some EROs to ensure a full and effective canvass of properties, see our resource '[Effective personal canvassing](#)'.

2.35 EROs are not legally required to follow up any HEF responses if they have successfully determined a registration application for that address and the applicant has indicated that they are the only person resident aged 16 or over (14 or over in Scotland).¹¹

 Further detailed guidance on the specific prescribed circumstances where an ERO is not required to send a HEF to a particular address is contained in **Chapter 3 - What to send and when**.

 In Scotland, 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 as part of the annual canvass has not been extended to 14 and 15 year olds. A personal visit to 14 or 15 year olds who have not responded to an ITR is not required at any time during the year.¹²

If you do not make a visit to the household, you should consider what other 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. For further information, see Chapter 2 of [Part 1: Planning for the delivery of electoral registration activity](#). We have provided specific guidance on engaging with young people and attainers in our [example tactics sheet](#) for reaching target audiences.

2.36 These processes will not all be linear and will need to be carried out concurrently, and you will need to determine how you will manage this in practice. To maximise the time you have available to complete the specified steps before publication of the revised register, you should start sending your initial HEFs as soon as possible.



Sharing good practice

A number of EROs issue canvassers with electronic tablets and this has enabled them to streamline the HEF and ITR processes. For information on how some EROs are managing this in practice, see our resource: [‘Use of tablets in electoral registration’](#).



We have produced a [summary sheet](#) that provides key dates for the canvass and summarises the processes you will need to follow depending on whether or not the HEF is returned.

Canvass areas or ‘rounds’

2.37 Taking into account your experiences during the 2017 canvass, you will need to consider how best to deploy canvassers for the 2018 canvass period and beyond, identifying what it is you will be expecting them to do and when.

2.38 You should review the canvass areas, or ‘rounds’, used in 2017 to ensure that they are the optimum size – which may vary throughout the registration area – to help maximise response rates. You should take into account the following when deciding on the size of your canvass areas:

- the number of properties in the area
- ease of access to individual properties in the area
- the number of canvassers that are available to you
- the levels of follow-up activity that, based on previous experience, you expect canvassers to be carrying out

2.39 Canvass areas should be kept under review as the canvass progresses in order to ensure that canvassers can be allocated to cover all non-responding properties/individuals in the registration area as appropriate.



We have produced a [list of questions](#) for you to consider in developing your personal canvassing plans.

Recruitment and training of staff

2.40 You will need to recruit and train staff as necessary to carry out the canvass.

2.41 The appointing local authority is under a legal obligation to provide you with the necessary staff to enable you to fulfil your statutory duties.¹³

2.42 It is important that you provide appropriate training for all staff (both permanent and temporary) working on the canvass to ensure awareness and understanding of legislative requirements.

2.43 Data protection training should be included in training for all staff, including canvassers. This will help you to embed data protection principles in your work and demonstrate compliance with the legislation. Guidance on demonstrating compliance with data protection legislation is contained throughout [our resource](#) on the EU General Data Protection Regulation and the Data Protection Act 2018.



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.

Recruitment of canvassers

2.44 Building on your experiences at the 2017 canvass, you will need to establish how many canvassers will be needed and when, and put in place plans to ensure that sufficient staff can be recruited, trained and supervised to carry out house-to-house enquiries and personal visits. Your plans should also reflect how, when and on what basis canvassers will be paid.

2.45 You should monitor the performance of canvassers and any canvassers whose past performance has been unsatisfactory should not be used again. You should also bear in mind that existing or experienced canvassers may not be

available, and you may therefore need to undertake additional recruitment exercises, targeting new or different groups.

Training of canvassers

2.46 One of the necessary steps for the purpose of complying with the duty to maintain registers of UK Parliamentary and local government electors set out in Section 9A of the RPA 1983 is ‘providing training to persons under [the Electoral Registration Officer’s] direction or control in connection with the carrying out of the duty.’

2.47 You therefore need to ensure that your canvassers are appropriately trained to carry out the job they have been appointed to undertake. You may need to deliver different training sessions, depending on how you decide to utilise canvassers.

2.48 All canvassers need to be trained to keep any personal information they may collect from electors safe. In particular, where canvassers are used to assist electors with completing an application on the doorstep, they must have received appropriate data protection training to ensure that, when they collect the personal details required for an application, any passers-by cannot overhear any personal information. Details on maintaining the security of personal data can be found in [Part 1: Planning for the delivery of electoral registration activity](#).



Further information on the recruitment and training of canvassers can be found in our [‘Canvasser recruitment and training checklist’](#). Resources to support the management and briefing of canvassers can also be found on our [website](#).

Recruitment and training of front-line staff

2.49 As part of your planning, you should consider how many staff you will need to respond to enquiries, including during peak periods. You should ensure that you continue to brief front-line staff on the registration process. This includes staff dealing directly with the public, either by phone or face-to-face, including those working at any contact centres or call management centres.

2.50 They will need to be able to direct people to their preferred channel(s) for registering to vote and, where appropriate, assist them with the registration process. This includes responding to standard enquiries and knowing how to apply knowledge to deal with a person’s individual circumstances, and also to be able to identify non-standard questions and to refer these to staff with detailed knowledge of registration. In particular, any staff receiving applications by phone or in person will be handling personal data and you should ensure all staff are trained accordingly to ensure that the data is handled in accordance with data protection legislation.



Further information about maintaining the security of personal data is contained in [Part 1: Planning for the delivery of electoral registration activity](#).

2.51 To ensure residents are given correct and consistent information, any staff undertaking electoral registration work should follow the instructions given to them for answering questions and dealing with enquiries. To support front-line staff we have produced a [frequently-asked questions \(FAQs\) document](#) covering a range of queries that may arise about electoral registration. You can adapt this document to reflect particular local issues including any that emerged during the 2017 canvass and at any scheduled polls.



In Scotland, appropriate training will need to be provided for all front-line staff to reflect the fact that 14 and 15 year olds can be included on the local government register as attainers. For example, staff will need to be given appropriate training and guidance relating to handling and storing the personal data of 14 and 15 year olds. Additionally, your systems should be set up in such a way as to ensure that the data of 14 and 15 year olds is only used for the limited purposes set out in law. Your experiences during the 2017 canvass, and in the period leading up to Scottish Parliamentary and local council elections should inform your plans and help you to ensure that appropriate safeguards are in place.

Elections during the canvass

2.52 As with any canvass, your plans should take account of the potential for an election to be held during the canvass period as this is likely to reduce the amount of time available to you to take the necessary steps to follow-up non-responses to HEFs and ITRs. Your risk register should also address the possibility of an election taking place during the canvass, including how you will redeploy resources to target registration in those areas in which the election is taking place.

2.53 If an election is held between 1 July and 1 December 2018, publication of the revised register can be postponed up to **1 February 2019**.¹⁴

2.54 An election during the canvass is defined as any of the following elections, whether general or by-elections, where the date of the poll is between 1 July and 1 December:¹⁵

- UK or European Parliamentary elections
- Scottish Parliamentary or National Assembly for Wales elections
- Local government – unitary, county, county borough, district, metropolitan borough, London borough and directly elected mayoral elections

- Local government – parish and community council elections in England and Wales
- Police and Crime Commissioner elections
- Neighbourhood planning referendums

2.55 You will need to make an operational decision whether to delay publication of the revised register and, if so, by how much. In reaching your decision you should consider the impact of the election on the canvass processes within the area affected by the election and across the registration area more generally. In particular, you will need to be satisfied that you will have sufficient time to take all necessary steps to ensure your registers are as accurate and complete as possible by the time of publication. The impact on the canvass processes will likely depend on what stage of the canvass you are at, and also how many polling districts are affected by the election.

2.56 You should also consider the impact that postponing the publication of the revised register may have on canvass processes. For example, where the revised register is published by 1 December, the bulk of personal canvassing to follow-up non-responders, is likely to take place in October. Where publication is postponed, and the personal canvass takes place later in the year, reduced daylight hours may impact on the willingness of canvassers to knock on, and non-responders to open, their doors. Inclement weather may also impact on a postponed canvass, and response rates may also reduce over the festive period.

2.57 Where you decide to postpone publication due to an election, you should take steps to make local political parties and elected representatives aware of the changed register publication date at an early stage.

2.58 As detailed in Chapter 5, a monthly notice of alteration may not be issued in the month you are publishing the revised register and in the two months before that day. Where the revised register is published on 1 December, this means that there will not be a monthly notice of alteration in October, November or December. However, if publication of the revised register has been postponed to, for example, 1 February 2019, you will publish a monthly notice of alteration in October and November 2018, but would not publish one in December 2018, or in January or February 2019.

Targeting electors

2.59 If an election is to be held during the canvass, your key focus will need to be on any new potentially eligible electors you have identified who have not yet registered and encouraging them to make an application in time to be able to vote at the election. This will include electors at addresses to which you have sent a blank HEF and potential new eligible electors to whom you have given an ITR. You should consider how best to target your resources to these addresses and

individuals, including to chase up responses to any 'reminder' HEFs or ITRs, so that as many eligible electors as possible are registered in time for the election.

2.60 Your canvass plan should set out what approach you would take in the event of an election during the canvass.

2.61 For example, ensuring that the polling district is printed on HEFs and ITRs will enable you to quickly identify and prioritise those forms that are relevant should there be an election in only part of the registration area. You could also include other registration-related information in the same envelope as an ITR, such as information about the registration deadline for a forthcoming poll.

2.62 Where the election affects the whole of the registration area, it will be particularly important that your resources are effectively targeted to maximise the number of eligible electors registered in time to participate in the election. Every effort should be made to conclude all HEF visits to non-responding properties well in advance of the registration deadline, but, given the time constraints and depending on the timing of the election, this might not always be feasible. You should draw on local data records and your knowledge about your local area to identify any new electors, including any properties where there are likely to have been changes. These could then be prioritised for personal visits.

2.63 Your plan should address such things as:

- what canvassers will have to do differently
- how canvass staff will be informed that there is an election and given their revised instructions
- what you will do to try to maximise the return of forms in the affected area(s) to reduce potential disenfranchisement
- how you will identify and prioritise the processing of HEFs and ITRs for area(s) affected by the election
- how the canvass will resume after the election
- how the decision on when to publish the revised register will be taken and what factors will be considered, bearing in mind publication can be delayed up to 1 February 2019
- how you will communicate that decision to local political parties, elected representatives and other interested individuals and groups

2.64 Your planning should be flexible enough to allow you to re-allocate staff resources (if necessary) to help ensure that as many forms as possible from the relevant area(s) are collected and returned to the electoral registration office in time to be processed and determined for inclusion in the final election notice of alteration. As detailed in Chapter 2 of [Part 2: Registration framework](#), the local authority that appointed you as ERO must, by law, provide you with the resources you need to discharge your statutory functions.

2.65 In your instructions to canvassers, you will have provided details on how often forms should be returned to the registration office. You will need to make clear how this will change if an election occurs. As a minimum, canvassers working in the area affected by an election should be instructed to return as soon as possible any completed voter registration forms that they have collected by the registration application deadline.

2.66 Canvassers delivering HEFs (which cannot be used to register) to non-responding properties in the electoral area(s) affected by the election should be instructed, if they are not already, to encourage any occupiers at the address who are not registered to do so online (or by telephone if you offer this service), and they should also highlight the registration application deadline. They could also have blank registration forms available for potential electors to complete where they do not have access to the internet.

2.67 Registration application forms (not HEFs) that are collected by canvassers by the registration deadline, even if they are not brought to the office of the Electoral Registration Officer until after the registration deadline, are deemed to have met the registration deadline. To make sure it is clear which forms were received by canvassers by the registration deadline, canvassers should be instructed to suspend their personal visits by not later than the end of the twelfth day before the poll. This will ensure that only forms received before the registration deadline will be processed. If the election only affects part of the registration area, canvassing only needs to pause in the affected area(s) and not across the whole of the registration area.

2.68 The use of local media and public awareness exercises may be useful in setting out to residents how they can register to vote in time to be included on the register for use at the election. In the event of any UK-wide poll during the canvass, it will be important to link your local messaging with any communication activity by the Commission in order to maximise its impact.

2.69 Where the election crosses local council boundaries, you will need to liaise with the ERO in the other local council(s) to ensure a consistent approach and messaging across the electoral area.

Register to be used for elections taking place during the canvass

2.70 Where an election is taking place, you must publish two interim election notices of alteration before publishing the final election notice of alteration on the fifth working day before the poll.¹⁶



[Part 4: 'Maintaining the register throughout the year'](#) contains guidance on publishing election notices of alteration.

2.71 The register to be used for an election taking place during the 2018 canvass will be the revised register published by 1 December 2017, as amended by subsequent monthly notices of alteration and any election notices of alteration.

2.72 Where a candidate requires subscribers, they must appear on the register in force on the last day for publication of the notice of election for the particular election taking place. In practice this will usually be the last notice of alteration published before the notice of election is published; and any subscribers must already be registered or be added to the register by that notice of alteration.



Chapter 11 of [Part 4: 'Maintaining the register throughout the year'](#) contains guidance on the deadlines for applications to be made for inclusion on a notice of alteration, including where an election is taking place.

3 What to send and when

Forms to be sent during the canvass

3.1 You must issue a Household Enquiry Form (HEF) to all properties in your registration area within the period of **1 July 2018** to **30 November 2018**. This must be a paper HEF in the prescribed format and cannot be sent by email or by any other electronic means.

3.2 There is an exception to the requirement to send a HEF to every property but **only** where a registration application has been successfully determined **and** the applicant has indicated in their registration application that they are the only person aged 16 or over (14 or over in Scotland) resident at that address. In this specified circumstance:

- Where the registration application is successfully determined **during** the annual canvass period (i.e. 1 July to the publication of the revised register), you are not required to send a HEF to that property during that canvass.¹⁷
- Where the registration application is successfully determined **outside** the annual canvass period (i.e. from publication of the revised register to 30 June), you are not required to send a HEF to that property as part of the **next** canvass.¹⁸

3.3 You may, however, still choose to issue a HEF in these circumstances, and indeed you should do so if you have reason to believe from other records that circumstances may have changed. In reaching your decision you could consider not only what other records are telling you about a specific address but also take into account your wider knowledge of the area. For example, if the address is in an area with typically high movement, you might decide there is nevertheless still value in sending a HEF at some point, or at least considering some other activity (such as a household notification letter) which would help to indicate any change in circumstances at that property.



Guidance on sending household notification letters is contained in [Part 4: 'Maintaining the register throughout the year'](#).

3.4 Further information on the HEF is provided [below](#). You are legally required to take specified steps to follow up any HEF non-responses, including issuing two reminders and making a personal visit.

3.5 There is a limited exception to the requirement to take specified steps to follow up HEF non-responses. If a HEF has been issued as part of the canvass and you then successfully determine a registration application for an individual

who is resident at that property **and** the applicant has indicated in their registration application that they are the only person aged 16 or over (14 or over in Scotland) resident at that address, you are not required to follow up the HEF non-response for that property.¹⁹ You may, however, still choose to do so and indeed you should do so if you have reason to believe from other records that circumstances may have changed.

3.6 A HEF cannot be used to register people. It is a mechanism to collect information about who is resident and eligible to register at a particular address. The information provided on a HEF will act as a prompt for further action based on the response received (see **Chapter 4**).

3.7 Any potential new electors identified (for example, where a name has been added to a HEF) will need to be sent an ITR and a registration application form, and you will need to take the specified steps – issuing two reminders and a personal visit – to follow up with any ITR non-responders. These processes will not all be linear and will need to be carried out concurrently.



In Scotland, 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 as part of the annual canvass has not been extended to 14 and 15 year olds. A personal visit to 14 or 15 year olds who have not responded to an ITR is not required at any time during the year.

If you do not make a visit to the household, you should consider what other 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. For further information, see Chapter 2 of [Part 1: Planning for the delivery of electoral registration activity](#). We have provided specific guidance on engaging with young people and attainers in our [example tactics sheet](#) for reaching target audiences.



Sharing good practice

The earlier in the HEF or ITR process a household or individual responds, the less resource intensive this is for the ERO. For examples of how some EROs are utilising their registration stationery and materials to encourage a response as early as possible, see our resource: [‘Encouraging responses’](#).



Guidance on giving ITRs and the follow-up processes you are required to carry out if you do not receive a response to an ITR, as well as guidance on processing returned applications is included in [Part 4: 'Maintaining the register throughout the year'](#).

3.8 You must give the invitation as soon as reasonably practicable and, in any event, within 28 calendar days of the date you conclude that the person may be entitled to be registered.²⁰ In some circumstances, however, such as where an election registration deadline is approaching or towards the end of the canvass, it may be appropriate to set a shorter deadline and it is for you to decide on a suitable deadline taking into account relevant considerations.

3.9 Where you have an email address for a potential elector you may use this to encourage them to make a registration application, either before or after you have issued the formal invitation to register. An invitation to register may also be given by electronic means, including by email.²¹

3.10 To avoid giving an invitation to register to a person who has already made an application to register you should have a process in place to identify whether such an application has been made before you give an invitation. For example, you may receive a returned HEF with a potential eligible elector added. You should bear in mind that the potential eligible elector may have made a registration application online or by telephone (if you have decided to offer that service). You should therefore ensure that as part of your working practices you have in place a process to check for applications received through any channel before you issue an invitation to register.

3.11 Your EMS system may be able to automate this process. However, you should bear in mind that the name on an application to register may not match exactly the name of the person you are considering giving an invitation to register to (their name, for example, may have been spelt differently by the person adding their name to a HEF). Therefore, some manual checking of applications received against ITRs to be issued may still be required.

The HEF

3.12 The canvass must be conducted using the HEF approved by the Minister for the Cabinet Office and made available by the Electoral Commission.

3.13 The form must be printed on A3 paper, folded to make an A4-size booklet. By law, you must not amend the form in any way other than to add certain local information. **The HEF cannot be sent by email or by any other electronic means and there is no discretion to use a form to like effect²².**



The prescribed blank and pre-printed HEFs and the ITR and voter registration form that you must use are available on our [website](#).

Our forms and letters guidance sets out which parts of the HEF (and other electoral registration forms) must be used exactly as provided and which parts can be customised. The [forms](#) and [letters](#) guidance for England and Wales, and the [forms](#) and [letters](#) guidance for Scotland is available for download on our [website](#).

Pre-printed HEFs

3.14 You must, if practicable, pre-print on the HEF certain information about each person currently registered at that address,ⁱⁱ namely:

- any of the information about the person required by the form that you already hold (full name and nationality)²³
- an indication as to whether each person listed on the form is aged 76 or over (in England and Wales only).²⁴ See paragraph **4.32** for information on how changes to the ‘aged 76 or over’ marker can be actioned on a returned HEF.
- an indication of whether each person is omitted from the edited register²⁵ and information on how they can change their preference²⁶ (‘omitted’ includes where the person has previously opted-out of the edited register or has at any time requested that their personal data is removed from the edited register until further notice under Article 21 of the General Data Protection Regulation).

3.15 You must only pre-print information relating to existing electors and not include the details for anyone who is not currently registered at that address, even if you think they may be resident and eligible to register.

3.16 You must add to the pre-populated HEF information about how residents can respond.²⁷ The form contains an editable area for you to add this information.

3.17 Although not required to do so by law, you should also include an indication as to whether each person has an existing postal or proxy voting arrangement.

ⁱⁱ You must not pre-print information relating to any of the following electors: offenders in prison; patients in mental health hospitals who are not detained offenders or on remand; a person on remand awaiting trial or sentence; electors registered following declarations of local connection, service declarations or overseas electors' declarations; or anonymous electors (Regulation 32ZA(5)(a) 2001 Regulations, Regulation 32ZA(5) RPR (Scotland) 2001).

3.18 The back page of the pre-printed HEF must include the statutory wording about the electoral register and the open register, as well as a statement that explains that the information provided in response to the form will be used in accordance with data protection legislation.

3.19 You should also add information about how to contact the electoral registration office. Additionally, you can add any or all of the following to support processing of the forms:

- a bar code
- a reference number
- a unique security code (for example, to be used by someone to respond to a HEF by phone or online)

Blank HEFs

3.20 Where it is not practicable to send a pre-printed HEF, you must send a blank HEF. For example, where a property has no registered electors, a blank HEF should be sent.

3.21 You can also add any or all of the following to support processing of the forms:

- a bar code
- a reference number
- a unique security code (for example, to be used by someone to respond to a HEF by phone or online)

3.22 You must include with the form information on how to respond to the HEF. The form contains an editable area for you to add this information.²⁸

3.23 Since there are no references on the blank HEF to the open register – because there is no existing choice to be pre-printed on the form – you don't need to include the wording about the open register on the back of a blank HEF. Instead, you may choose to add any other supporting information you consider may be helpful to the recipient of a blank HEF, for example, some frequently asked questions.

The covering letter

3.24 The HEF must be accompanied by a covering letter. While this letter is not prescribed, we have produced a template for you to use. We have produced a template for use in England and Wales and a template for use in Scotland. The template letters have been subject to user testing with both blank and pre-populated HEFs.



The suite of voter registration forms and template letters for use at the 2018 canvass can be accessed on [our website](#).

Reply envelope

3.25 You must also include with any HEF that you issue, a pre-addressed, pre-paid reply envelope in which the form can be returned.²⁹

4 Responses to HEFs

Response mechanisms

4.1 By law a person who has received a HEF must provide the information that it requires to the ERO, but there is no requirement for the form itself to be returned. This includes where there are changes to any information pre-printed on the HEF or new information is being provided.

4.2 The channels that are provided for people to respond to a HEF will be determined by each ERO based on local circumstances and could include telephone or online. For the benefit and convenience of all electors, you should offer alternative response mechanisms such as telephone or online wherever possible. This will also help you meet your duties under the Equalities Act, as people who may have difficulties completing a paper form are given the opportunity to provide the information in ways other than in writing.



[Part 2: 'Registration framework'](#) contains guidance on the key considerations relating to putting in place processes for receiving information other than on a paper form.

Declaration of truth

4.3 Both pre-printed and blank versions of the HEF provide a space for a signature to be given to show that the declaration of truth has been made.³⁰ The declaration of truth **must** be made, but it does not have to be in the form of a signature. For example, it could be given orally.

4.4 Where a form is not signed it can still be accepted if you are satisfied that the declaration of truth has been made in some other way.

4.5 If the declaration is missing, you should return the form to be signed or make contact with the household, for example, by telephone, and ask the person who completed the form to make the declaration. You should ensure that the person has an opportunity to review the information they have provided and satisfy themselves that it is true and accurate. For example, you could read the information back to them and ask them to confirm that the information is true, making sure that you keep a written note of the discussion.

Processing HEF responses

4.6 Your registration plans should address how HEF responses will be dealt with. Responses to HEFs will fall into the following broad categories:

- no changes
- names of existing registered electors crossed off
- additions
- changes to existing electors' details
- request for changes to absent vote and open register choices

4.7 In some cases, you may also receive notification that the property has no residents who are eligible to be registered.

4.8 Where no response to a HEF is received, you will need to carry out the required follow-up processes as set out in paragraphs **4.54** to **4.63**.

4.9 There is a limited exception to the requirement to take specified steps to follow up HEF non-responses. If a HEF has been issued as part of the canvass and you then successfully determine a registration application for an individual who is resident at that property **and** the applicant has indicated in their registration application that they are the only person aged 16 or over (14 or over in Scotland) resident at that address, you are not required to follow up the HEF non-response for that property. You may, however, still choose to do so and indeed you should do so if you have reason to believe from other records that circumstances may have changed.



We have produced a [summary sheet](#) that provides key dates for the canvass and summarises the processes you will need to follow depending on whether or not the HEF is returned.

No changes

4.10 If the details on the pre-printed HEF are confirmed via any of your allowed response mechanisms, you need take no further action.

Names of existing registered electors crossed off

4.11 You may be notified in response to a pre-printed HEF that existing electors have moved out. Names crossed out on a pre-printed HEF **must not** be automatically deleted from the register. You can remove an entry from the register when you are satisfied that a person is no longer entitled to be registered and you have two different sources of information and both confirm that the elector is no longer resident.³¹

4.12 You can also remove an entry from the register when you receive:

- a death certificate in respect of the elector
- a notification from the registrar of births and deaths that the elector has died
- Information that the elector is deceased:
 - as a result of the canvass (for example, a returned HEF with an elector marked as deceased)
 - from a close relative (spouse, civil partner, parent, grandparent, brother, sister, child or grandchild of the elector). This can be provided in person, by telephone or in writing but must include:
 - the full name and address of the elector who has died;
 - the full name and address of the person providing the information;
 - their relationship to the deceased; and,
 - a statement that the person providing the information is aware of the penalty for providing false information³²

Where the information is provided in person or by telephone, you must record the information in writing or in data form.

- from a care home manager of a registered care homeⁱⁱⁱ. Can be provided in person, by telephone or in writing but must include:
 - the full name and address of the elector who has died;
 - the full name and address of the person providing the information; and,
 - a statement that the person providing the information is aware of the penalty for providing false information³³

Where the information is provided in person or by telephone, you must record the information in writing or in data form.

- from the records of the council that appointed you (and, if you are an ERO for a district council in a two-tier authority, the records of the relevant county council)
- from a person or organisation providing services to the council that appointed you (including, if you are an ERO for a district council in a two-tier authority, the relevant county council)

4.13 You can also remove an entry from the register when you receive a notification through the IER Digital Service or another ERO that a person registered in your area has made an application for registration elsewhere and

ⁱⁱⁱ under Part 2 of the Care Standards Act 2000 in England and Wales. In Scotland, "care home" means a care home service registered under Part 5 of the Public Services Reform (Scotland) Act 2010(a) and "care home service" has the meaning given by paragraph 2 of schedule 12 of that Act.

has indicated that they have ceased to reside at the address in your area, and the new ERO has allowed the application.

4.14 If the information you receive as a result of the canvass does **not** indicate that an elector is deceased – for example, where a name is crossed off on a returned HEF but the elector is not marked as deceased – you **must not** automatically delete that entry from the register. In this circumstance, the returned HEF represents **one** source of information, and you must obtain a **second** source, if you haven't obtained it already, confirming that the elector is no longer resident before you can remove the elector.

4.15 Checks of local records even before you receive a response to HEFs (whether before the canvass starts or after initial forms have been sent) could provide you with a separate piece of information, which could enable you to delete the entry on return of a HEF with a crossed off name where the elector is not marked deceased.

4.16 Alternatively, the information on the returned HEF should act as a prompt to check other records available to you in order to obtain a second source. If the record checks do not reveal any further information, you should undertake a review of that person's entitlement to remain registered.

4.17 As ERO, you will need to demonstrate that all information obtained – whether from inspecting council records, or disclosed by your council – complies with the principles of processing personal data, ensuring that it is processed lawfully, fairly and in a transparent manner. Therefore, you should record details of:

- the records to be checked
- a schedule of when those checks are carried out
- the lawful basis on which you are processing that information. For example, Section 9A places an obligation on the ERO to inspect records that they are permitted to inspect as part of their duty to maintain the electoral register. Section 9A therefore provides the statutory basis by which you process personal data obtained through council records
- measures to ensure appropriate security is in place to protect the data (for example, encrypting/password protecting data whenever it is transmitted, and using secure storage)
- what action you have taken on the basis of the information you have obtained
- retention and secure disposal of data (in accordance with your document retention plan)

4.18 Maintaining such records will help you to demonstrate that you are complying with your obligations under data protection legislation and your duties under Regulation 35 and 35A of the RPR 2001.



Detailed guidance on deletions and on administering registration reviews is contained in chapters 9 and 10 of [Part 4: 'Maintaining the register throughout the year'](#). We have also provided summaries of the [deletions and review process](#) on our website.

In addition, [our resource](#) on the EU General Data Protection Regulation and the Data Protection Act 2018 shows how you can put measures in place to meet the requirement to demonstrate compliance and ensure that data protection is integral to all you do.

Additions

4.19 If a HEF is returned with the names of potential eligible electors, you must invite them to register within 28 calendar days of receipt unless, in the meantime, they have made an application to register.³⁴

4.20 You do not need to know the full or exact name of a potential elector in order to give them an invitation to register. You do, however, need to have enough information about their name to be able to identify them as an individual.



For detailed guidance on giving ITRs and following up with non-responders, go to Chapter 3 of [Part 4: Maintaining the register throughout the year](#).

Encourage an application to register to be made

4.21 Where you have the e-mail address and phone number(s) of individuals who appear to be eligible to register, you can use this information for any appropriate purpose in connection with that person's entitlement to be registered, or for the purpose of discharging your duties under Section 9A of the RPA 1983. For example, where a blank HEF is returned with potential eligible electors and email addresses have been provided for these individuals, you might want to encourage them to make an application to register by email either before or after you have formally invited them to register. This does not obviate the need to send an invitation to register within 28 days of becoming aware of the potential elector. An invitation to register may be given by electronic means, including by email.



Guidance on informally encouraging applications to be made before giving an ITR is provided Chapter 2 of [Part 4: Maintaining the register throughout the year](#).

Storage of email addresses and phone numbers



General considerations relating to handling personal data and the security, storage and retention of forms are set out in [Part 4: 'Maintaining the register throughout the year'](#) and in our [resource](#) on the EU General Data Protection Regulation and the Data Protection Act 2018.

4.22 Where a HEF response contains individuals' e-mail addresses and/or telephone numbers you should ensure that these are recorded as appropriate against the records for the individual in question, in accordance with data protection legislation requirements, and that this information is only used for the purpose for which it was collected.

4.23 Additionally, if you have existing records of email addresses or phone numbers collected through a previous HEF or an application to register, at the time that you next use that information, you should take appropriate measures to ensure that the data subject is aware of how you will continue to process this data such as:

- explain the data subjects right to object to further processing
- link to your privacy notice
- the inclusion of the 'unsubscribe' option as discussed in paragraph 3.16 of [our resource](#) on the EU General Data Protection Regulation, which allows the data subject to object to the use of their contact information for this purpose

Changes to existing electors' details

4.24 If you have sent a pre-printed HEF you may receive a response that indicates that there are changes to an existing elector's details. This could include, for example, changes to:

- name
- nationality
- the 'aged 76 or over' age indicator (in England and Wales)

Change of name

4.25 Where an elector has changed their name and wishes to update the electoral register to reflect the change they must complete a change of name form and provide supporting evidence of the change.³⁵



[Part 4: 'Maintaining the register throughout the year'](#) contains guidance on electors who wish to apply to change their name.

Change of nationality

4.26 Where an elector indicates that they have changed their nationality, you should check whether this affects their entitlement to vote. Where the change does impact on their entitlement, they would need to make a fresh application to register since a person cannot be registered via a HEF. For example, where an elector whose nationality is 'French' amends their nationality to 'British', you should invite that person to make a fresh registration application. This is because their existing French nationality means that they are currently registered in the local government register of electors only, and changing their nationality to 'British' would also entitle them to be registered in the parliamentary register of electors.

4.27 If you are not satisfied as to any applicant or elector's nationality, you have the power to require the applicant or elector to provide documentary evidence confirming their nationality.³⁶ In the circumstance set out in paragraph **4.26** where a change in nationality positively affects an elector's entitlement to vote, you should request documentary evidence of the change of nationality.

4.28 Under data protection legislation, nationality data is classed as a special category of personal data because it may reveal an individual's racial or ethnic origin.

4.29 Data protection legislation prohibits the processing of special categories of personal data unless an additional lawful basis, beyond those for the main purposes of processing data, is met. The appropriate lawful basis for processing special categories of personal data for electoral purposes would be that it is necessary for reasons of substantial public interest and with a basis in UK law.

4.30 Additionally, the Data Protection Act 2018 takes this further, stating that the special requirements only apply if the data controller has in place a 'Policy Document'. Therefore the Data Protection Act 2018 requires that in order to process nationality data you must have in place a policy document which, amongst other things, must explain:

- the procedures for complying with the data protection principles
- the policies for retention and erasure.

4.31 Therefore, your policy document will need to reflect your local processing procedures and your policies for the retention and erasure of personal data. This policy document must be kept until six months after the processing ceases, be reviewed and updated at appropriate times and be made available to the ICO on request.



More detailed guidance about your power to require evidence of nationality is contained in [Part 2: 'The registration framework'](#).

Change to the 'aged 76 or over' indicator (England and Wales only)

4.32 Where an elector indicates in response to a HEF that they are (or are not) aged 76 or over, you should reflect this as appropriate with the relevant marker on the register.

Request for changes to absent vote and open register choices

Absent vote preferences

4.33 The blank HEF makes no reference to absent voting.

4.34 Although not required to do so by law, you should include an indication as to whether each person has an existing postal or proxy voting arrangement on a pre-printed HEF. The pre-printed HEF also explains that an elector can download an absent vote application form from www.yourvotematters.co.uk/.

4.35 If you are notified via a returned HEF through whatever response channel that an elector wishes to apply for an absent vote, you should send the relevant application form. If the elector is not yet registered this should be accompanied with an invitation to register since only a person that is (or will be) registered may be granted an absent vote. For someone to meet the 'will be registered' criteria, the five day objection period must have passed and you must have positively determined their registration application, which means they will be added to the register on publication of the next notice of alteration or on publication of the revised register, whichever is first.³⁷

4.36 An existing elector may also indicate that they wish to cancel an existing absent vote arrangement. Any such request should be from the relevant elector. For example, where one member of a household completes the HEF and indicates that another member of the household no longer wishes to vote by post, you should contact that elector directly to confirm that they wish to cancel the absent vote arrangement.



[Part 5: 'Absent voting'](#) contains guidance on applications for absent votes, and making changes to absent voting arrangements.

Open register choices

4.37 If an elector wants to change their open register opt-out choice they can make a request to the ERO to this effect.

4.38 A response to a HEF sent out during the canvass **cannot** be treated as a valid request to change an existing open register preference and this is stated on

the pre-printed form itself, which includes an explanation of how to make such a request.

4.39 There may be circumstances, however, where a response to a HEF suggests that the elector wishes to change their open register choice. For example, where a HEF has been returned to you, there may be some mark on the form (such as a change in the ‘included on open register?’ column) which could indicate that an elector wishes to opt out of or into the open register.

4.40 If you receive such a response you should contact the elector in question, either orally or in writing, to explain the process for changing their opt-out choice and asking them to make a request to you if they do want to change their choice. The request can be made either verbally or in writing and must include the elector’s full name, address and an indication of whether they wish to be included in or omitted from the open register.³⁸ If you receive a HEF response that appears to indicate that everyone listed on the form wants to change their choice, you should contact each elector individually.

Article 21 of the EU General Data Protection Regulation

4.41 Under data protection legislation electors have the right to require you to exclude them from the edited register (also known as the open register) on a permanent basis (or until further notice). Article 21 of the EU General Data Protection Regulation gives individuals a ‘right to object’ to processing for direct marketing purposes and you are under a legal duty to comply with a valid request.

4.42 It is possible for an elector to make a request under Article 21 of the GDPR in response to a HEF provided it is sufficiently clear that the notice comes from the elector and that they wish to opt out of direct marketing, or opt out of the open register, permanently or until further notice. You have a legal duty to comply with a valid request made under Article 21.

4.43 Therefore, where a response to a HEF clearly indicates that a person wishes to opt out of the open register until further notice (for example, if you receive a response to the HEF where there is only one elector at the address, and that elector had clearly indicated on the form that they wanted to be removed from the open register until further notice) you should treat the HEF response as a notice under Article 21 of the GDPR. However, if you are in any doubt as to whether the request comes from the elector, or as to their intentions, you should contact the elector to explain what the process is for changing their open register choice and ask for confirmation before processing the request.

4.44 If you receive a response from only one person that appears to make a request on behalf of everyone listed on the form, you should contact each elector individually.



Chapter 11 of [Part 4: 'Maintaining the register throughout the year'](#) contains guidance on the process for electors to make changes to their opt-out choices to and how to give effect their choices, including dealing with Article 21 requests.

Section 3 'right to object' of our [resource](#) on the EU General Data Protection Regulation and the Data Protection Act 2018 highlights the importance of maintaining records to detail any request made under the right to object to processing and ensuring that personal data is processed lawfully, fairly and in a transparent manner.



In Scotland, a person under 16 years old is automatically opted out of the edited register. The details of any person under 16 years old must not be included in **any** version of the published register, including the edited register.

4.45 None of the above circumstances affect the processing of the HEF, which should proceed as usual.

Deletions arising from information on a HEF

4.46 If you receive information as a result of the canvass – for example on a returned HEF – that an elector is deceased, and you are satisfied that information is correct, you may automatically delete that entry from the register. The other circumstances in which you may delete an elector based on only one source of evidence are set out in paragraph **4.11**.

4.47 If the information you receive as a result of the canvass does **not** indicate that an elector is deceased, you **must not** automatically delete that entry from the register. You must obtain a **second** source of evidence before you can remove the elector. The information on which a decision to delete an entry without a review is based must be from **different** sources.³⁹

4.48 For example, information arising from the canvass could include a name crossed off a returned HEF where the elector is not marked as deceased, or a HEF sent by post being returned as undeliverable/return to sender/not at this address. In these cases, you would have evidence from one source and information from a second source would also be required before a determination to delete the elector could be made. The two sources of evidence must be different; two pieces of mail returned as undeliverable are unlikely to be information from two sources.

4.49 If you have information from a HEF that indicates that a person may no longer be eligible, you should take steps to establish whether there is information

from other sources which could support a deletion. This could include checking local data such as council tax records. If you have information from a source other than the elector themselves you could attempt to contact the elector directly including by phone, email or post to make enquiries.

4.50 Alternatively, you can conduct a review of the person's entitlement to remain registered.

4.51 Once you have determined that a person is no longer entitled to remain registered at the address in question you should remove their entry from the register and give effect to this on publication of the next notice of alteration or on publication of the revised register, whichever is first.

4.52 Once you have given effect to a deletion you do not need to send written confirmation of your determination to the elector where the deletion is made as a result of:⁴⁰

- information from two different sources
- information that an elector is deceased as per paragraph **4.12**
- a notification through the IER Digital Service or another ERO that the person registered in your area has made an application for registration elsewhere **and** has indicated that they have ceased to reside at the address in your area, **and** the new ERO has allowed the application

4.53 You may, however, still choose to confirm the deletion if you think it might be helpful to do so, which could be done by email if you hold the individuals email address.



Chapter 9 of [Part 4: 'Maintaining the register throughout the year'](#) contains further guidance on deleting entries from the register and appeals against deletions. Chapter 10 contains guidance on administering registration reviews.

Follow up processes where no response is received

4.54 You are required by law to take certain steps to obtain a response from those properties who do not respond to the initial HEF.⁴¹

4.55 This means it is essential that you have a process in place to interrogate your EMS system to identify whether you have received the information before it produces a reminder HEF. Your EMS supplier (if applicable) will provide you with instructions on how to do this.

4.56 None of the steps set out below apply if, having inspected other council records you conclude that there is nobody resident at the address, or it is solely a business premises.

4.57 There is a limited exception to the requirement to take specified steps to follow up HEF non-responses. If a HEF has been issued as part of the canvass and you then successfully determine a registration application for an individual who is resident at that property **and** the applicant has indicated in their registration application that they are the only person aged 16 or over (14 or over in Scotland) resident at that address, you are not required to follow up the HEF non-response for that property.⁴² You may, however, still choose to do so and indeed you should do so if you have reason to believe from other records that circumstances may have changed.

'Reminder' HEFs

4.58 If you have given a HEF to an address and have not received information in response within a reasonable period of time, you must give a second HEF to that address.⁴³ You may visit the address at any time to obtain the information required.⁴⁴

4.59 If you do not receive the information within a reasonable period of time after you have given the second HEF you must give a third HEF.⁴⁵ If you have not already made a visit at this point, you could consider doing so before or at the same time as giving the third HEF. The reminder HEFs must be the same as the original form sent.

4.60 While a 'reasonable' period of time is not defined in legislation, in our view this should be no longer than 28 days and may in some circumstances be shorter (for example where you are approaching the conclusion of the canvass or where there is an election due to take place). This means that once you have issued HEFs to properties in your registration area, you should send a reminder to non-responding properties within 28 days. Where the first reminder does not generate a response, a second reminder should be sent within 28 days of the first reminder.

Making at least one visit

4.61 If you have given a third HEF and had no response, you are required by law to make at least one visit to the address for the purpose of obtaining the required information if you have not already done so.⁴⁶



In Scotland, 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 as part of the annual canvass has not been extended to 14 and 15 year olds. A personal visit to 14 or 15 year olds who have not responded to an ITR is not required at any time during the year.

If you do not make a visit to the household, you should consider what other 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. For further information, see Chapter 2 of [Part 1: Planning for the delivery of electoral registration activity](#). We have provided specific guidance on engaging with young people and attainers in our [example tactics sheet](#) for reaching target audiences.

4.62 You can choose to make a visit at any time in the process, for example at the same time as delivering any of the HEFs. In any case you have a duty to take all necessary steps to comply with your duty to maintain the electoral register, which includes carrying out house-to-house enquiries, and so you may have already met this requirement by the time you decide that you have not received a response to the third HEF. You must, however, have made a visit specifically for the purpose of obtaining the information required by the HEF. In our view, this means a visit where you have attempted to make contact personally with a person at the address.



In Scotland, 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 as part of the annual canvass has not been extended to 14 and 15 year olds.



Chapter 2 of [Part 2: 'Registration Framework'](#) sets out your duties under Section 9A of the Representation of the People Act 1983.



Sharing good practice

For information on and examples of methods adopted by some EROs to ensure a full and effective canvass of properties, see our resource ['Effective personal canvassing'](#).

4.63 If you have made a visit only for the purpose of leaving a form at the address, this would not in our view satisfy the requirement. If, however, on such a visit the person making the visit spoke to a member of the household and attempted to obtain the information required by the HEF, the requirement to have made a visit is likely to have been satisfied. As with all stages of this process, you should ensure that you keep records for the purpose of having a clear audit trail of the steps that you have taken as part of the HEF process. You should in any case consider making a further visit if this is likely to result in you obtaining the required information.

Penalty for failure to respond to a HEF or providing false information

4.64 By law a person who has received a HEF must provide the information that it requires to the ERO, but there is no requirement for the form itself to be returned.⁴⁷ This includes where there are changes to the information pre-printed on the HEF or new information is being provided.

4.65 There is a criminal penalty of a fine up to a maximum of £1,000 for failing to provide the information required by the HEF to the ERO.⁴⁸

4.66 The penalty for providing false information to an ERO is up to six months imprisonment, an unlimited fine in England and Wales or a fine of up to £5,000 in Scotland.⁴⁹

5 Publication of the register

Monthly notices of alteration

5.1 Updates to the register must be published on the first working day of each month, except that you may not issue a monthly notice of alteration in the month you are publishing the revised register and in the two months before that day.⁵⁰ If the register is published in November this means you will not publish a monthly notice of alteration in September, October and November. If it is published in December, you will not publish a monthly notice of alteration in October, November and December.

5.2 We have published a [document showing when monthly updates must be published](#), and, based on those dates, when applications must be made and when they must be determined by you for inclusion in a particular monthly update, or in an election notice of alteration.

Timing of publication of the revised register

5.3 You must publish the revised register by 1 December⁵¹. The only exception to this rule is if there has been an election during the canvass (see [‘elections during the canvass’](#) for further information).

5.4 The requirement to publish by 1 December means that you have the discretion to decide to publish the revised version of the register before this date. Dies non do not apply in this instance, so the requirement to publish by 1 December (or 1 February) applies even if the date falls on a weekend or bank holiday. You therefore can publish the register on a Saturday, Sunday or bank holiday if you choose to do so.

Table 1: Application and determination deadlines that apply to the revised register

Event	Dates if the revised register is published on 1 December		Dates if the register is published in November
	England and Wales	Scotland	
Last date for receipt of new applications to register	22 November 2018	21 November 2018	23 October 2018 (6 working days before the determination deadline)
Determination deadline	30 November 2018	29 November 2018	31 October 2018 (last working day of the month prior to the month when the revised register is published)
Anonymous registration application and determination deadline	30 November 2018	29 November 2018	31 October 2018 (last working day of the month prior to the month when the revised register is published)
Deadline for amendments to and removal of register entries	30 November 2018	29 November 2018	31 October 2018 (last working day of the month prior to the month when the revised register is published)
Publication	By 1 December 2018 ^{iv}	By 1 December 2018 ^v	Any date during November

^{iv} If an election is held where polling day falls between 1 July and 1 December 2017, the publication of the register can be postponed until up to **1 February 2018** (Sections 13(1A), 13(2) and 13 A(1), RPA 1983).

5.5 Publishing in November therefore means that the revised register would not reflect any new electors who had applied to register after 23 October, nor would it reflect any other amendments or deletions which were determined after 31 October. While the registration process continues throughout the year, the publication of the revised register is a key milestone. Publishing on 1 December will help to ensure that the revised register is as accurate and complete as it can be and will maximise opportunities for potential electors to be included.

5.6 Whenever you decide to publish, you should be able to explain the reasons for your decision. For guidance on the publication of the revised register where an election takes place during the canvass, see paragraphs **2.53** to **2.58**.

Content of the revised register

5.7 The ERO must publish:

- the full register of electors for all election types combined as far as possible into one register and containing the appropriate franchise markers
- the edited register which is an exact copy of the full register but with the exclusion of those who have opted out of their details appearing on it
- the list of overseas electors



In Scotland, the local government register will include 16 and 17 year olds as full electors. Additionally, 15 year olds and some 14 year olds are entitled to be included on the local government register as ‘attainers’. For the purposes of the local government register in Scotland, an attainer is someone who turns 16 by the end of the twelve months following the 1 December after the ‘relevant date’ (see Chapter 3 of [Part 2: Registration framework](#) for more information on the ‘relevant date’).

The combined register will therefore need to make clear the date on which those included on it that are under 18 years of age will become 18 years old in order to clearly show their eligibility to vote in different elections.

No information on those aged under 16 must be included on **any** version of the register published or otherwise made available, except in very limited circumstances. For further information, see Chapter 11 of [Part 4: Maintaining the register throughout the year](#).

Describing the full and edited registers

The terms ‘full register’ and ‘edited register’ are the technical terms used in the legislation. The terms ‘electoral register’ and ‘open register’ have to be used to describe the full and edited register to members of the public, to make it easier to understand the purpose of each register and how it is used. In specific instances where we mention the edited register in the guidance in this context, we refer to the edited register as the ‘open register’. Otherwise we use the term ‘edited register’.

The full register

5.8 The full register of electors lists the names and addresses of everyone who is registered to vote as an ordinary elector. It also contains the names of those registered as special category electors, except in the case of those registered anonymously, in which case it includes only an entry, without showing the name or address.



In Scotland, no information on those aged under 16 must be included on **any** version of the register published or otherwise made available, except in limited prescribed circumstances. For further information on these exceptions, see Chapter 12 of [Part 4: ‘Maintaining the register throughout the year’](#).

5.9 Your revised register must incorporate all the additions and amendments to the register which you have determined by the relevant deadline.⁵² Information provided in response to a HEF cannot be treated as an application to register, nor can a name identified through checking local records be added to the register. Only when an application is made and successfully determined can an individual be added to the register. You should also give effect to any deletions that you have determined since the publication of the last notice of alteration and in time to be reflected in the revised register.

5.10 The transition to individual electoral registration ended with the publication of the 2015 revised register (required by 1 December 2015). Since publication of the 2015 revised register, all electors included on the register will either have been confirmed or have made a successful individual application to register.

5.11 There is one minor exception to this, which relates to certain special category electors who renewed their declaration under the old system and the transitional provisions. Special category electors who were registered before the introduction of individual electoral registration (i.e. before 10 June 2014 in England and Wales and before 19 September 2014 in Scotland) were not required to register under the new system until they renewed their registration for

the first time under individual electoral registration.^{vi} Since the registration of a member of HM Forces (or their spouse or civil partner) lasts for 5 years, it is therefore possible that there are some service voters who are still registered under the 'old' registration provisions. Once the declaration of these service voters expires, or their circumstances change, they will need to make a fresh application to register.

The edited register

5.12 You must publish a revised version of the edited register on the first working day of **every** month.⁵³ This duty applies all year, including during the canvass period.

5.13 However, you can only include or remove an elector from the edited register if they are already an existing elector included on the full register or on any alteration notice.⁵⁴ This means that in the months when the publication of alterations to the full register is suspended, the revised edited register must not include the details of any new electors whose details have yet to be added to the full register. Any requests from existing electors to change their opt-out status, however, will need to be reflected.

5.14 You are required to publish a fully integrated updated version of the register rather than simply a notice setting out the changes.⁵⁵ However, you do not have to print a full edited register every month, only if you are producing one for somebody who has requested it.

5.15 You must also publish a revised edited register at the same time as you publish the revised register.⁵⁶ The published edited register must be in the same format as the full register and must contain all the information pertaining to an elector who has not opted out as would appear on the full version of the register,⁵⁷ such as the markers as outlined below.



In Scotland, a person under 16 years old is automatically opted out of the edited register. The details of any person under 16 years old must not be included in **any** version of the published register, including the edited register.

^{vi} Where an existing special category elector's registration renewal date fell in the three months beginning with the start of the transition to individual electoral registration, the special category elector did not need to provide personal identifiers and was able to renew their registration under the 'old' registration provisions. In England and Wales, the three-month period ran from 10 June 2014 to 9 September 2014 (inclusive). In Scotland, the three-month period ran from 19 September 2014 to 18 December 2014 (inclusive).



Chapter 11 of [Part 4: 'Maintaining the register throughout the year'](#) contains guidance on the process for changing opt-out preferences and the edited register.

Format of the register

5.16 The format of the register is not prescribed but it must contain, with the exception of certain special category electors as set out in paragraph **5.19** below, the name, address and elector number of every eligible elector whose application to register has been determined by the relevant deadline.⁵⁸



In Scotland, the details of any person under 16 years old must not be included in **any** version of the published register, including the edited register.⁵⁹

5.17 You must divide the register into polling districts and give each one a unique set of letters.⁶⁰ You must give a number to each elector⁶¹ and as far as is reasonably practicable these numbers should be allocated in such a way that the numbers run sequentially in each part of the register. The polling district letters and the number together are known as the elector number.



We have published guidance on undertaking [reviews of polling districts](#), [polling places and polling stations](#) which is available on our website.

5.18 The entries in the register showing each ordinary elector must be arranged in street order and may only be arranged in alphabetical order by name or a mix of the two where it is not reasonably practicable to list them in street order.⁶²

5.19 There must be a section after the ordinary electors in any polling district marked 'other electors', containing any special category electors who are not listed in the main body of the register listed by surname in alphabetical order and without an address, followed by any anonymously registered electors.⁶³



Chapter 7 of [Part 4: Maintaining the register throughout the year](#) sets out in detail how special category electors should be included on the register.

Register markers

Franchise markers

5.20 The names of electors who may only vote in certain types of elections must be prefixed in the register with certain letters:⁶⁴

- E** indicates that the elector is an overseas elector who is also a peer eligible to vote in the House of Lords and is only entitled to vote at European Parliamentary elections.
- F** indicates that the elector is an overseas elector who is only entitled to vote at UK Parliamentary and European Parliamentary elections.
- G** indicates that the elector is a citizen of a member state of the European Union (except a Commonwealth country or the Republic of Ireland) who is only entitled to vote at local government elections.
- K** indicates that the elector is a citizen of a member state of the European Union (except a Commonwealth country or the Republic of Ireland) who is entitled to vote at European Parliamentary and local government elections.
- L** indicates that the elector is a peer eligible to vote in the House of Lords who is entitled to vote at European Parliamentary and local government elections.

An additional marker (**U**) is provided for in Scotland to indicate citizens of European Union member states (except a Commonwealth country or the Republic of Ireland) who have specifically indicated their wish to register for European Parliamentary elections but have not applied for registration as a local government elector.⁶⁵ You should encourage such electors to also register as local government electors, although the U marker would need to be used where the elector does not additionally make a normal application for registration.

5.21 Table 2 shows an example of some of the formatting for a register and an accompanying explanation in the right-hand column.

Table 2: Sample electoral register

Elector number	Franchise marker	Name	Address	Description (not shown on register)
1		Evans, Gareth	1, The Street	Ordinary elector; can vote at all elections
2	12/06/yyyy	Juba, Charlotte	2, The Street	Attainer; can vote if poll is on or after date shown
3	G	Chamberlain, Louise	2, The Street	Local government elector only
4	K	Mackenzie, Scott	3, The Street	Local government and European Parliamentary elector only
5	L	Pack, Daniel	4, The Street	Peer; eligible to vote in the House of Lords, cannot vote at a UK Parliamentary election

Other electors

Elector number	Franchise marker	Name	Address	Description (not shown on register)
6	F	Jolly, Simon		Overseas elector; cannot vote at local government elections
7		Watts, Julie		Service elector; can vote at all elections
8	N			Anonymous elector; can vote at all elections
9		N		Anonymous elector; can vote at all elections (same effect as entry 8 above but alternative option)
10	GN			Anonymous elector who is a citizen of an European Union member state; can vote at local government elections only
11	G	N		Anonymous elector who is a citizen of an European Union member state; can vote at local government elections only (same effect as entry 10 above but alternative option)



In Scotland, the combined register will need to make clear the date on which those included on it that are under 18 years of age will become 18 years old in order to clearly show their eligibility to vote in different elections.

No information on those aged under 16 must be included on **any** version of the register published or otherwise made available, except in very limited circumstances. For further information, see Chapter 11 of [Part 4: Maintaining the register throughout the year](#).

Communications following the publication of the revised register

5.22 The focus on the numbers of those registered and not registered is as high profile as it has ever been and you can therefore expect that the publication of the revised register could prompt enquiries to you, which you should be prepared to respond to.

5.23 If you haven't already done so, you should consult with your local authority press or communications teams to ensure that you are able to react quickly to any local stories that may emerge, particularly if there has already been local coverage on the issue of electoral registration in your area.

5.24 You should consider issuing a press release announcing the total number of people registered in your area, highlighting the work you have done to get people registered and outline what additional work you have planned. As part of this, you should point out that there is still an opportunity to register in time for the next scheduled elections, using it as a call for anyone in your area who is not yet registered to do so. Given the potential for a continued media focus on the registration rates of students and attainers, you might find it helpful to highlight the work you are doing with schools, colleges, universities or any relevant voluntary groups to encourage registration.

5.25 Your press team can get further advice by contacting the Electoral Commission press office on 020 7271 0704, or by emailing press@electoralcommission.org.uk.

Register to be used for elections taking place after publication of the revised register

5.26 The revised register has immediate effect on publication. Unlike a notice of alteration which only has effect at an election if published on or before the fifth working day before the poll, a revised register has immediate effect for all elections.

5.27 Once you have published the revised register it will be used for polling purposes for any election with a polling day on or after the date of publication, although you are also required to publish two interim election notices of alteration and a final notice of alteration on the fifth working day before the poll.⁶⁶ The nomination of candidates will be based on the register in force on the last date for publication of the notice of election.



Chapter 11 of [Part 4: 'Maintaining the register throughout the year'](#) contains guidance on publishing election notices of alteration.

Poll cards at a December election

5.28 If an election is held in December, the notice of election will be published before the deadline for publishing the revised register. Returning Officers (ROs) must send poll cards to those registered electors entitled to vote at the election as soon as practicable after publication of the notice of election.

5.29 If poll cards are sent before the publication of the first interim election notice of alteration (which will be the last day for the delivery of nomination papers), the data used to generate them would not reflect any additions or deletions which have been determined after the deadline for the September monthly update.

5.30 Taking into account the particular circumstances of a December election, there is therefore a strong argument that the earliest point at which it would be practicable to issue poll cards would be immediately following the publication of the first interim election notice of alteration. This approach would also help to ensure that the data used to generate the issue of poll cards reflects additions and deletions which have been determined during the canvass period.

5.31 If you are not also the RO, you should therefore work with them to put mechanisms in place to ensure that poll cards can be sent to electors as soon as possible after the first interim notice has been published. Further information on the application and determination deadlines that apply to interim notices can be found in Chapter 11 of [Part 4: Maintaining the register throughout the year](#).

Electors numbers

5.32 While the elector numbers printed on the poll cards are likely to be different to the numbers allocated when the register is revised, this will not affect a person's entitlement to vote. ROs will need to make clear to polling station staff at their training session that the elector numbers will be different and explain to them that they should not refer to the elector number printed on the poll card when marking the register and completing the corresponding number list. As always, polling station staff should in all cases ask the elector to confirm their name and address and should only use the number as it appears against the elector's

details in the polling station register for completing the corresponding number list. Polling station staff should also be briefed to ensure they are able to respond to any queries from electors who may question why the number being read out and written on the corresponding number list is different to the one which is printed on their poll card.

Which register is a December election run on?

5.33 Where a candidate requires subscribers, they must appear on the register that is in force on the last day for publication of the notice of election. For any election in December, and assuming the revised register is published on 1 December and there have not been any other elections, this will be the September register. If the revised register is published in November, assuming there have not been any other elections, this will be the August register.

5.34 As set out in paragraphs **5.28** to **5.30**, if the revised register is to be published on 1 December, the register as amended by the first interim election notice of alteration should be used for the first issue of poll cards to ensure it is based on the most up-to-date data as possible.

5.35 Once the revised register is published, it has immediate effect and will apply to any poll on or after publication.

Supply to candidates and local political parties

5.36 Where the publication of the revised register falls during the election period, this will impact on a candidate's and political party's ability to engage with electors and campaign effectively. It is therefore particularly important that candidates and parties who have requested a copy of the revised register and any updates and election notices of alteration are provided with copies as soon as possible after publication.

Elections where the final election notice of alteration is published before the revised register

5.37 A final election notice of alteration is published 5 working days before the poll. Where publication of the revised register will be on 1 December, and a poll will take place **after** publication, the final election notice of alteration will be published **before** the revised register. The registration application deadline will be the deadline for applications for inclusion on the revised register. This is because the revised register has immediate effect and will apply to any poll on or after publication. Therefore, while the registration application deadline for inclusion on the final election notice of alteration will be twelve working days before the poll, because the revised register is published after the final election notice of alteration and before the poll, it will have effect for that poll. This means that potential new electors can submit a registration application until the deadline for inclusion on the revised register (six working days before the determination

deadline). Provided their application is determined by the determination deadline for the revised register (which is the working day before publication) they will be entitled to vote in the poll.

5.38 However, the registration application deadline for new electors wishing to vote by post at such an election would effectively be 5pm eleven working days before the poll. This is because the application for a postal vote must state the address in respect of which the applicant is registered or has applied to be registered. Therefore, if a new elector wants to vote by post, they will need to have applied to be registered by the postal vote application deadline, i.e. by 5pm eleven working days before the poll.

5.39 The registration application deadline for new electors who wish to vote by proxy will be the same as for those voting in person (i.e. the deadline for applications for inclusion on the 1 December register). This is because the deadline for registration applications to be made in time to be included on the 1 December register will be before the ordinary proxy application deadline (5pm six working days before the poll).

5.40 Elections after the publication of the revised register, but where the final election notice of alteration is published before the revised register will therefore present a number of administrative challenges for EROs and ROs. If you are not also the RO, you will need to liaise with them to:

- Discuss any practical implications, including the timely transfer of data.
- Ensure candidates and agents have access to the relevant electoral registers. Candidates and agents will need access to the register for nomination and campaigning purposes. You should put a mechanism in place to ensure that candidates and agents can be supplied with a copy of the register in a timely way. This includes supplying them with the first interim notice of alteration as soon as possible after its publication, as well as any subsequent updates once they have been published.
- Produce polling station registers. Polling station registers will not be able to be produced until after publication of the revised register, and mechanisms will need to be put in place to enable registers to be printed and collated in a limited time. ROs will need to consider how to manage the preparation of ballot boxes to facilitate this.

5.41 The specific challenges and solutions will vary depending on the particular local circumstances. If you would like any further guidance or would like to discuss your particular situation, please contact your [local Commission team](#).

6 After publication

6.1 It is important that you continue to maintain the register after publication to ensure it is as accurate and complete as possible.



[Part 4: 'Maintaining the register throughout the year'](#) contains guidance on identifying and targeting potential new electors on an on-going basis and on identifying and deleting electors who are no longer eligible to remain registered.

Guidance on reviewing and revising your public engagement strategy and registration plans is contained in [Part 1: Planning for the delivery of electoral registration activity](#). Evaluating the success of your public engagement strategy following the publication of the revised register will inform your plans for on-going work to identify and target potential new electors ahead of the next scheduled polls.

6.2 We will continue to collect supporting data following the publication of the revised register as in previous years.

Data

6.3 The [performance standards framework](#) sets out the data which we expect to collect. This data is valuable for providing context to help both us and EROs to understand the scope and scale of the challenges and demonstrate progress made in response to these challenges. We will continue to work with EMS suppliers to ensure that the data requirements are built into the systems to ensure the collation of the data is automated. This should help make the process as straightforward as possible for you, and help to ensure consistent completion of returns.

RPF 29

6.4 You are required to supply to the Secretary of State a document setting out certain prescribed information relating to the revised register.⁶⁷

6.5 In Scotland, this must also be supplied to Scottish Ministers and the Registrar General of Births, Deaths and Marriages for Scotland.⁶⁸

6.6 Each year the Office for National Statistics (ONS) and, in Scotland, the National Records of Scotland will issue an RPF29 form to EROs for this purpose. You are required to submit this information as soon as possible after publication of the revised register.⁶⁹

Access and supply

6.7 Access to the full electoral register is limited to those prescribed in legislation. You have a duty to supply free copies of the register of electors to various organisations and individuals, and legislation imposes restrictions on how this is done. In some cases, registers have to be supplied on publication and in others the register is only supplied on request.

6.8 You should maintain records of every person and organisation supplied with the register, whether on publication, by sale, or on request, 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.

6.9 You should ensure that every person/organisation receiving the register, whether on publication, by sale, or on request, is aware that:

- they must only use the register for the purpose(s) specified in the Regulations permitting its supply
- once the purpose for which the register has been supplied has expired, they must securely destroy the register
- they understand penalty for misuse of the register

6.10 The information suggested above is included in the cover sheets we have made available for the [sale](#) and [supply on request](#) of the electoral register.



In Scotland, only EROs and their staff will have access to and be able to make use of data relating to those under 16 years of age, and no version of the register or any absent voting lists published or otherwise made available should contain that data. However, the data may be disclosed:⁷⁰

- To the individual themselves (including to demonstrate that they are a permissible donor, in which case the data must be disclosed) or to a person they have appointed as proxy to vote for them.
- For the purposes of a criminal investigation or criminal proceedings relating to the registration of electors or the conduct of elections.
- In a pre-printed HEF sent to a household for the annual canvass, although the date of birth of any person aged under 16 years old must not be pre-printed.
- To EROs and Returning Officers in connection with the registration of electors or the conduct of elections.

The only other exception is that before a Scottish Parliamentary or local government election, the information on those under 16 years of age **who will be eligible to vote at the election** (i.e. will attain the age of 16 on or before polling day), can, for the purposes of or in connection with the election, be disclosed in

the electoral register, postal voters list, list of proxies and list of postal proxies, that is supplied to:⁷¹

- Candidates at Scottish Parliamentary and local government elections for electoral purposes or to comply with the rules on political donations.
- The Returning Officer for the purposes of Scottish Parliamentary or local government elections.
- The Electoral Commission. In this case, the Commission is only allowed to use the information in connection with its functions relating to donation controls and publication of information about donors, but the latter does not enable publication of the names and addresses of those under 16 years old.
- A local authority Returning Officer for the purposes of an election to a National Park authority. In this case, the information can only be used for the purposes of a National Park authority election.

The information supplied before an election must not contain dates of birth, or anything else that would identify a voter as under 16 years old.

No other individuals or bodies may be supplied with any information relating to those aged under 16 years old.



Detailed guidance on access to and supply of the register is contained in [Part 4: 'Maintaining the register throughout the year'](#). We have also produced a [List of people entitled to be supplied with the electoral register](#) and cover sheets for the [sale](#), supply on [request](#) and [inspection](#) of the electoral register which set out how it may be used and the penalty for misuse.

6.11 The timing of receipt of the register is particularly important to some recipients – for example, political parties need the electoral register to fulfil their statutory obligations in relation to the checking of donations, in addition to using it for campaigning purposes. It is important that the register is supplied promptly and you should, therefore, supply the register to anyone who is entitled to receive it on publication as soon as possible and in any case, within 5 working days.



To be able to meet the outcomes set out in [Performance standard 2](#), you will need to ensure timely supply of the register to those entitled to receive it. To demonstrate how the outcomes have been met, you will need to set out the date[s] the register was supplied, along with the date[s] it was requested, for those entitled to receive the register on request.

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- ¹ Regulation 32ZA(4) Representation of the People (England and Wales) Regulations 2001 (2001 Regulations), Representation of the People (Scotland) Regulations 2001 (RPR (Scotland) 2001)
- ² s9D(1) Representation of the People Act (RPA) 1983
- ³ Regulations 32ZB(1), (2), 32ZD(1) and (2) 2001 Regulations, RPR (Scotland) 2001
- ⁴ Regulation 32ZA(4A) 2001 Regulations
- ⁵ Regulation 32ZA(4B) 2001 Regulations
- ⁶ Section 9 RPA 1983
- ⁷ Regulation 31C 2001 Regulations, RPR (Scotland) 2001
- ⁸ Regulations 32ZA(4), 32ZC(3)(d) and 32ZD(4) 2001 Regulations, RPR (Scotland) 2001
- ⁹ Regulation 32ZC(3)(za)(ii) 2001 Regulations, Regulation 32ZC(4) RPA (Scotland) 2001
- ¹⁰ Section 9A(2) RPA 1983 and Regulation 32ZB 2001 Regulations, RPR (Scotland) 2001
- ¹¹ Regulation 32ZB(5A) 2001 Regulations, RPR (Scotland) 2001
- ¹² Section 9A(2A) RPA 1983
- ¹³ Section 52(4) RPA 1983
- ¹⁴ Section 13(1)(a) RPA 1983
- ¹⁵ Section 3(1)(a) and 13B(4) RPA 1983
- ¹⁶ Sections 13AB and 13B RPA 1983
- ¹⁷ Regulation 32ZA(4A) 2001 Regulations, RPR (Scotland) 2001
- ¹⁸ Regulation 32ZA(4B) 2001 Regulations, RPR (Scotland) 2001
- ¹⁹ Regulation 32ZB(5A) 2001 Regulations, RPR (Scotland) 2001
- ²⁰ Regulation 32ZC(3)(a) 2001 Regulations, RPR (Scotland) 2001
- ²¹ Regulation 32ZC(za)(ii) 2001 Regulations, Regulation 32ZC(4) RPR (Scotland) 2001
- ²² Regulation 32ZA(4) 2001 Regulations, RPR (Scotland) 2001
- ²³ Regulation 32ZA(5)(a) 2001 Regulations, RPR (Scotland) 2001
- ²⁴ Regulation 32ZA(5)(b) 2001 Regulations, RPR (Scotland) 2001
- ²⁵ Regulation 32ZA(6)(b) 2001 Regulations, RPR (Scotland) 2001
- ²⁶ Regulation 32ZA(6)(c) 2001 Regulations, RPR (Scotland) 2001
- ²⁷ Regulation 32ZA(3)(k) 2001 Regulations, RPR (Scotland) 2001
- ²⁸ Regulation 32ZA(3)(k) 2001 Regulations, RPR (Scotland) 2001
- ²⁹ Regulation 32ZA(4) 2001 Regulations, RPR (Scotland) 2001
- ³⁰ Regulation 32ZA(i) 2001 Regulations, RPR (Scotland) 2001
- ³¹ Regulation 31C(2) 2001 Regulations, RPR (Scotland) 2001
- ³² Section 13D, RPA 1983
- ³³ Section 13D, RPA 1983

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- 34 Regulation 32ZA(3)(a) 2001 Regulations, RPR (Scotland) 2001
35 Regulation 26(4) 2001 Regulations, RPR (Scotland) 2001
36 Regulation 24(1) 2001 Regulations, RPR (Scotland) 2001
37 Sections 9(2), 10ZC(1), 13 and 13A RPA 1983
38 Regulation 93A(2) 2001 Regulations, RPR (Scotland) 2001
39 Regulation 31c(2)(b)(i) 2001 Regulations, RPR (Scotland) 2001
40 Regulation 31c(1) 2001 Regulations, RPR (Scotland) 2001
41 Regulation 32ZB 2001 Regulations, RPR (Scotland) 2001
42 Regulation 32ZB(5)(a) 2001 Regulations, RPR (Scotland) 2001
43 Regulation 32ZB(1) 2001 Regulations, RPR (Scotland) 2001
44 Regulation 32ZB(3) 2001 Regulations, RPR (Scotland) 2001
45 Regulation 32ZB(2) 2001 Regulations, RPR (Scotland) 2001
46 Regulation 32ZB(3) 2001 Regulations, RPR (Scotland) 2001
47 Regulation 23(1) 2001 Regulations, RPR (Scotland) 2001
48 Regulation 23(3) 2001 Regulations, RPR (Scotland) 2001
49 Sections 13D(6) RPA 1983
50 Sections 13A(2) and (3) RPA 1983
51 Section 13(1) RPA 1983
52 Section 13(2) RPA 1983
53 Regulation 93(3B) 2001 Regulations, RPR (Scotland) 2001
54 Regulation 93(2) 2001 Regulations, RPR (Scotland) 2001
55 Regulation 93 2001 Regulations, RPR (Scotland) 2001
56 Regulation 93(1) 2001 Regulations, RPR (Scotland) 2001
57 Regulation 93(3) 2001 Regulations, RPR (Scotland) 2001
58 Section 9(2) RPA 1983
59 S13(1) Scottish Elections (Reduction of Voting Age) Act 2015
60 Regulations 38 and 39 2001 Regulations, RPR (Scotland) 2001
61 Section 9(3) RPA 1983
62 Regulations 41(1) and (2) 2001 Regulations, RPR (Scotland) 2001
63 Regulation 41(3) 2001 Regulations, RPR (Scotland) 2001
64 Regulation 42 2001 Regulations, RPR (Scotland) 2001
65 Regulation 42(4) RPR (Scotland) 2001
66 Sections 13AB and 13B RPA 1983
67 Regulation 44 2001 Regulations, RPR (Scotland) 2001
68 Regulation 44 RPR (Scotland) 2001
69 Regulation 44(1) 2001 Regulations, RPR (Scotland) 2001
70 Section 14 Scottish Elections (Reduction of Voting Age) Act 2015
71 Sections 14(3) and (4) Scottish Elections (Reduction of Voting Age) Act 2015