



THE ASSOCIATION OF ELECTORAL ADMINISTRATORS

Formal views on readiness for the implementation of Individual Electoral Registration (IER) in June 2014

1. Introduction

- 1.1. The Association of Electoral Administrators (AEA) was founded in 1987 and has since established itself as a professional body to represent the interests of electoral administrators in the United Kingdom. It is a non-governmental and non-partisan body and has 1745 members, the majority of whom are employed by local authorities to provide electoral registration and election services.
- 1.2. The AEA Board sought input from its members through the regional AEA Branches on the subject areas below and the feedback received has informed the views expressed in this paper.

2. Overarching comments

- 2.1. The general view of our members is that they will deliver IER despite the considerable challenges it will present. This concern was demonstrated in London where a ballot was undertaken of grass root members on their confidence as to whether IER would work on 10 June 2014 and thereafter. The ballot returned an overwhelming no result. Whilst this result needs to be considered in the context of responses from the wider electoral community, it demonstrates that administrator confidence in the workability of IER is not where it should be at this stage in the process. Particular concerns relate to the reliance on third parties for infrastructure and data processing, and there is also considerable uncertainty about delivery in a number of key areas necessary for the successful implementation of IER in 2014 and beyond. **We have considered these risks and our overall RAG rating for the programme is AMBER.**
- 2.2. This assessment is given at present on the basis of the available information and with a number of significant components required for the implementation of IER not yet fully completed and tested. There is very little room for slippage to the current timetable. If such slippage occurs, it has the potential to

significantly impact administrators' ability to deliver IER. If any of the risks set out below fail to be fully and properly addressed, the AEA may need to reconsider its view about preparedness to proceed with IER in 2014. In particular, we will closely monitor progress in the development and testing of the IT infrastructure and the forms design.

Capacity to deliver the change

- 2.3. A decision to proceed with IER according to the current timetable will mean that IER is delivered within the context of other electoral events scheduled for 2014 significantly impacting on administrators' existing workloads. Many key events in the IER timetable are during periods where the focus should and must be on the European Parliamentary Elections (EPE). In many areas, there will be combined polls with high profile local government elections. Voters, parties and candidates will rightly expect these to be delivered successfully. Whilst we accept there is no easy solution to the issues of capacity within the profession, we are keen to see a programme that removes as much overlap as possible. This is particularly the case because of the delayed canvass into early 2014 which extends into the period in which administrators will need to begin election preparations.
- 2.4. It is vital that Cabinet Office engages directly with Electoral Registration Officers (EROs) throughout this period to ensure that electoral staff have the support and resources they need to deliver this change.

3. IT infrastructure

Software

- 3.1. Electoral administrators have generally not been made aware of the system changes that the Cabinet Office is requiring Election Management Software (EMS) suppliers to make or the schedule for delivering these. It is vital that EMS users have this information to be able to assess their supplier's delivery of the required functionality. In addition, we expect Cabinet Office to be monitoring the situation nationally. By virtue of the expected amount of change and the anticipated timescales for testing and roll-out, administrators are unlikely to have any great opportunity to see and use test versions of their EMS before using them in a "live" situation.

Online Digital Service

- 3.2. A national website allowing electors to register online is welcomed, but we are only eight months from the roll-out of IER. We believe therefore that it is imperative that the site is available to administrators as a matter of urgency for both comment and testing. The digital service is yet to be demonstrated for the verification process. Until administrators are able to see this in operation it

is unclear how this will impact on workloads or how it will integrate with current systems.

ERO reliance on GDS and DWP

- 3.3. The move to IER represents a shift for EROs from being largely self-reliant in determining registration applications to a position of reliance on the digital service (provided by GDS) and the DWP, in addition to their EMS supplier. Problems do arise with even the most robust and secure systems and there is real concern about the potential consequences of failure at any point in this now extended supply chain. A failure at -11 days before the poll at any election when there is likely to be large numbers of late registration applications in the pipeline could result in electors being disenfranchised. This is of particular concern as the first time this will be used "live" will be at the 2015 UK Parliamentary General Election.
- 3.4. Local testing is scheduled for March 2014 in the pre-election period for the May polls. Until then, administrators cannot know with any degree of certainty that the system will be ready and capable of working when IER comes into effect for new applications to register from 10 June 2014. The timing of this testing is less than satisfactory, coming immediately after publication of the revised registers and in the middle of the preparation period for the May 2014 elections.

RAG status: Amber Red End-to-end IT testing must be robust and address concerns about the capacity of the system to withstand stress and high volumes at -11. Contingency scenarios must be developed to provide clarity for EROs about what to do in the event of a failure in the IT at any point in the supply chain.

4. Confirmation Live Run (CLR)

- 4.1. As a result of the confirmation dry run, there is general confidence that the CLR can be delivered effectively. There are some concerns locally about issues with GCSX and the shift to PSN. There remain concerns about the currency and accuracy of some of the DWP data.
- 4.2. However, the main area of concern is the scheduling of the CLR and of the nationwide IER publicity which do not appear to be concurrent. Unless this is changed, it will leave large numbers of authorities with little or no time to undertake local data matching to increase the number of electors who could be confirmed onto the IER registers. This would impact on the resulting workload and costs involved in the write-out, and on the number of electors being asked to make an individual application to register.

RAG status: Amber Further consideration must be given to scheduling to allow all local authorities to be able to distribute all IER forms during the campaign period. This should include an increase in the number of records that can be sent to the DWP and the ability to start the CLR before mid June. An electronic local data matching facility should be made available by all EMS suppliers.

5. Forms

- 5.1. The initial designs for the various forms have resulted in administrators having limited confidence that considerations relating to correct completion and processing have been sufficiently explored. Revised versions of both A4 and A3 forms have just been made available for comment via the Cabinet Office portal. The final size and design of the various forms are still unconfirmed and these factors have the potential to significantly impact on a person's ability to complete the form as well as the costs and resources involved in their production and processing.
- 5.2. There are particular concerns in Wales regarding the design of the forms, as all forms have to be sent out bilingually with Welsh text normally taking up to a third additional space to the equivalent English. We are unclear as to progress on the design of these forms or the impact on the size and processing of forms for use in Wales. As indicated above, all of these factors have implications for printing and processing costs, including potentially the purchase of new scanning equipment, and whether work can be undertaken in-house or requires outsourcing. We would expect information about the design and size of the forms for use in Wales to be made available at the same time as the information about the forms for use in England and Scotland.
- 5.3. Crucially, the forms should also emphasise more prominently that the applicant can register online. This channel has the potential to be more efficient both for the elector and for administrators.

RAG status: Red The size and design of the forms must be decided and made available as a matter of urgency to enable administrators across Great Britain to plan effectively. Funding should be adjusted accordingly to address any impacts on costs and resources.

6. Engagement

- 6.1. EROs are required to develop engagement strategies to support the accuracy and completeness of electoral registers under IER. The challenges will be particularly concentrated in urban metropolitan areas with a high degree of population movement. We recognise that the funding allocations are designed to recognise the scale of the challenge an ERO is likely to face in these areas.

- 6.2. However, we remain concerned about the practical difficulties there will be across the country in registering students, as well as residents of Houses in Multiple Occupation (HMOs).

RAG status: Amber Much work has been carried out on the issue of student registration through national and regional forums. However, effective communication and dissemination are vital in order for the strategy to deliver results locally. In addition, we are unclear as to the extent to which there is ongoing dialogue with landlord bodies such as the NLA or the RLA in order to support the registration of residents of HMOs. We would welcome further discussions with Cabinet Office on what more could and should be done in these areas.

7. Legislation and guidance

- 7.1. The secondary legislation providing the detail of the processes to be followed in delivering IER has been laid in the UK Parliament. However, we are aware that it has been subsequently amended and re-laid. As a result, we understand that the detailed guidance published little more than a month ago and the training materials to be used for the Cabinet Office training are being revised to take account of these changes. We understand that it is hoped that the legislation will be made before Christmas.
- 7.2. The guidance is extensive reflecting the complexity of the new system. It has been published at a time when administrators are delivering the postponed annual canvass and, therefore, it may be some time before administrators are able to assimilate this information. Note also our comments on training and capacity.

RAG status: Amber Green

8. Training

- 8.1. The issue of IER training generally has been settled and the AEA is planning to support administrators by offering training which is complementary to that being provided on behalf of the Cabinet Office. We remain concerned however that the training delivery model of ALIERTs is fraught with danger, introducing the risk of a fragmented and inconsistent approach across the electoral community.
- 8.2. We are concerned about the timescale for administrators to be trained on any new or revised procedures arising as a result of changes to the EMS given that the local testing is scheduled for March with training to be delivered in March – April when administrators will be preparing for the EPE and, in many areas, local government elections taking place in May 2014. Attention should be given to assessing the EMS suppliers' capacity to schedule and deliver effective

training given that they will be testing and rolling out the required functionality, and will also need to be able to support their users in the run-up to and during the elections and during the transition to IER.

- 8.3. Any lack of capacity resulting in a delay in rolling out this training or in a failure to provide sufficient support to users represents a key risk to the effective implementation of IER and should be closely monitored. We believe that the key principle underpinning any training is that those delivering it should have the expertise to do so effectively.

RAG status: Amber Little if any room for slippage with potentially significant impact.

9. Funding during and beyond the transition to IER

- 9.1. We believe that overall the transition to IER will be adequately funded on the basis of current information. However, the allocations have only just been released thereby enabling administrators to factor these into their planning for the transition to IER. Up to this point, any planning has been difficult without this key information. It is too soon to comment on whether those allocations are sufficient in all areas. In addition, concern remains high about the impact of the current financial environment within local government, with the likelihood that existing ERO budgets may still be subject to cuts as a result of efficiency or other savings identified within the local authority.
- 9.2. In the longer term, we have significant concerns regarding funding beyond 2015 when the business as usual (BAU) costs for EROs of registering electors individually are not yet clear. We have received no guarantees about the BAU funding arrangements at a time when a further reduction in local government funding is planned for 2015-16. Whilst we hope that online registration will offset much of the additional expenditure we envisage as a result of the additional administrative requirements of IER, we cannot be sure of the uptake at this stage and must assume that additional budget provision will be required.

RAG status: Amber

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06 November 2013