Proposals for reform of the annual canvass

Annex - Collated questions

Question 1

We are proposing that the national data matching process is mandatory to complete, with local data matching being conducted at the ERO's discretion.

Do you agree that this is the right approach? Yes

Please explain your reasoning.

We believe that all EROs should undertake national data matching based on the results achieved during the IER confirmation process. Whilst accepting the match rate changes significantly across the country, we feel that the DWP is a good data source and should be used by all EROs.

We also welcome the ability for EROs to decide whether local data matching is useful in their area and which data sources will be of value. We would encourage the Government to help EROs in exploring what data sources, in addition to those they currently use, might be available and how to work with partners to enable them to access this information in a usable format.

Question 2

We are proposing that any property with a red elector should be converted into a red property. A property will only be green if all of the electors in the property are individually green.

Do you agree this is the right approach? Yes

Please explain your reasoning.
The basis of canvass reform is that data will be used to assure the ERO that all registered electors are still present at a property. We cannot support any system whereby communications that do not require a response are sent to a household where the ERO is not satisfied that all residents are still eligible for inclusion on the register.

Question 3

Do you think a minimum standard for the accuracy of locally held datasets should be mandatory? Yes

Please explain your reasoning.
Without setting a minimum standard for locally held data there is a significant risk to the integrity of the electoral register. It is imperative that EROs understand the data they have access to and its currency and accuracy as well as any limitations.

The AEA is concerned that at present many EROs may use datasets without sufficiently understanding their accuracy. Any assistance that can be given in helping them to ensure the data they are using is of a sufficient standard would be welcomed. There must also be clear guidance on how to interpret the accuracy threshold and how EROs ensure they can test this on an ongoing basis.

We would support guidance regarding the accuracy threshold, but would not support a mandated level.

Question 4

Do you agree that Empty and Void properties should be sent through a data matching process? Yes

Please explain your reasoning.

Whilst it will not be possible for empty and void properties to be included in national data matching, we believe local data matching should be used. There are EROs with static populations of ineligible electors, for example American military bases, who would benefit from using local data sources, as will those with high proportions of second/holiday homes.

We would also suggest that thought is given in guidance as to whether there is merit in recommending EROs data match empty and void properties at more than one point in the canvass, and potentially as a separate exercise ahead of elections. Whilst this isn't necessary for all types of void and empty property, there is merit in the ERO considering the potential benefits of such activity.

Question 5

Do you agree that recent applications to register should be exempted from the data step and automatically marked as green?

Yes. We believe that in many cases EROs are registering electors when they first move into a new property thanks to collaborative working with other services at their local authority. As a result, it is likely that they hold accurate information that would not be matched with national or local data. There needs to be a mechanism in place for these citizens that ensures they are not inconvenienced by needing to make a response when the ERO is confident the information they hold is up to date and accurate.

If Yes, what time period do you think should be defined as "recent" (1 month, 2 months, linked to the last monthly update? etc). Please explain.

We believe EROs should have discretion in this area, they know their electorate best and are likely to want flexibility depending upon how static their population is. We would suggest however that the time period is not more than two months. We would also suggest that the period set relates to the notice of alteration they appear on rather than individual application or determination dates.

If No, please explain your reasoning.

Question 6

Do you agree with no longer including a single occupancy tick box on registration application forms? Yes

Please explain your reasoning.

The administrators we have spoken to confirm that, despite revised wording, there are still a significant number of applicants ticking this box when it does not apply. This is causing a lot of work and expense without sufficient offset benefits.

However, we support further consideration relating to asking applicants who else is resident in the property. Collecting qualitative information would help EROs ensure that all residents who are eligible are invited to register. We would like to see further work done to see how practical this would be in terms of EMS functionality and ensuring this information could be processed in a straightforward way. As part of this work, we also believe serious thought should be given to the merits in allowing EROs to hold details of those ineligible to register due to their nationality. Without this there is the potential for ineligible electors to be asked on more than one occasion to register.

Question 7

Do you agree that an email contact should be permitted as the first form of contact for households in Route 1 (where an email address is held), followed by a paper contact if there is no response? Yes

Please explain your reasoning.

We appreciate that this is an area where there are many differing opinions, but on balance we believe that route one households should be able to respond to an e-communication before a paper contact is made.

Our opinion is based on what we perceive to be the way citizens wish to communicate and the additional benefits this approach brings.

Whilst accepting the e-communication does not mean that the household has been contacted – i.e. by a letter through the door, the communication will be to someone who the ERO is confident is still resident. If the fundamental principle of canvass reform is accepted – i.e. electors' information is confirmed by accurate data matching, then contacting the elector personally should not undermine the process. We also think it gives additional benefits whereby if an elector has been incorrectly confirmed it is letting them know that they are still registered at a previous address so they can take steps to be removed. There are also potential cost savings to be found, although we know at present some commercial suppliers are charging more than the likely cost of a posted communication. There would be merit in the Government looking at e-communication charges and where alternatives could be used.

Across all aspects of canvass reform though we would stress the need for all communications to be carefully considered and thoroughly tested. It is imperative that the citizen is confident of the origin of the e-communication and understands the actions they need to take.

Consideration will also need to be given as to whether all electors with necessary contact details are communicated with or whether it is a limited number within a property. Also, we do not believe those under the age of 18 should be approached.

Finally, we feel that email should be extended to include other e-communication options available to EROs, such as text message or a Council app.

Question 8

Do you agree with the proposed process for Route 1? Yes, in principal.

Please explain why.

We believe that using data to deliver a better experience for citizens is the right approach to take. Electors cannot understand the necessity to confirm their details each year and allowing them to be contacted without needing to respond is a step forward. It will also deliver much needed cost savings to local authorities.

We would again stress the importance of the wording on the communication to ensure that citizens understand what actions, if any, they have to take. In particular we have concerns regarding ensuring changes that need to be made, such as electors becoming 76, reaching voting age or identifying other residents having moved in, are clearly outlined.

Also, we believe it is in the interests of the citizen and local authority that channel shift away from paper responses is enabled as far as possible. EROs should be encouraged to make use of these channels rather than require paper replies.

Question 9

Do you agree with the proposal to exclude mandatory follow up activity (reminders and household visits, etc.) with households sent through Route 1? Yes

Please explain why.

The entire premise of canvass reform is to make better use of data enabling the citizen to not need to respond to communications when there is no change in the composition of their household. It would be a backwards step to require any ERO to conduct follow up activity. Also, assuming e-communications are permitted, several households will receive two different types of contact giving them an additional opportunity to consider the information they are sent.

Question 10

Do you agree with the proposed process for Route 2? Yes

Please explain why.

We believe Route 2 is the right approach to take given the only properties sent via route 2 are those who the ERO genuinely believes has had a change in composition.

In addition, it is essential that the prosecution sanctions for the non-return of the HEF and ITR that are available now to ERO's are still available in the future, if not improved under canvass reform.

Question 11

Do you agree that a personal contact (door knock or telephone call) should be a mandatory element of the revised canvass? Yes

Please explain why.

There is significant evidence of the positive impact personal contact has on canvass responses. We are pleased that telephone contact has been included and would suggest that being able to also use email should be considered.

Whilst accepting there is still substantial cost associated with personal canvassing, the proposed new model will see a large number of properties who are no longer required to respond and as a result significantly fewer properties will need to be contacted.

Question 12

Are there property types in addition to those detailed above that you believe should be directed to Route 3? Yes.

Please list and explain your reasoning. We believe that the following should be considered:
- mobile home sites,
- hospital staff accommodation,
- armed services personnel barracks, and
- marinas.

Question 13

Do you believe this is the correct process to deal with these properties? Yes

The process outlined is correct for these properties, however, the data provided needs to be in a useable format for the ERO.

Whilst the AEA supports the designation of a responsible officer with a duty to supply the information to the ERO, consideration needs to be given to the requirements in other areas, for example caravan parks. Greater clarity is required in legislation for individuals to provide information where they have no official designation.

In addition, the introduction of responsible officers at a university could mean 20 different officers if there are 20 halls of residence. Whereas the university data controller would mean just one officer for the ERO to speak with.

We would also ask that clarity is given as to whether the list from a responsible officer can be used as one form of evidence if someone who is on the register of electors is not on the list.

If No, can you suggest an alternative approach?

Question 14

Do you believe that sending these properties into Route 2, the full canvass, if the ERO is unable to obtain data, is the correct safeguard for these properties? Yes

Please explain your reasoning.

If the ERO is not able to access the required information then there is no option other than to send the property down route 2.

We firmly believe however that further assistance should be given to EROs in helping them to access information from institutions, especially military barracks and students.

Question 15

Do you agree with the proposal that pending/potential electors should be included in the data matching and canvass communication? No

If No, please explain why. Pending/potential electors are not registered electors and we fear that including them on any communication would mean the clarity of the communication would be compromised.

Some ERO's keep pending/potential electors on their software whilst others remove them at periodic intervals or at a certain point, for example prior to the annual canvass. Canvass

reform is an opportunity to look at pending/potential electors in more detail with statutory provision being made for pending/potential electors to be deleted at the ERO's discretion once all statutory steps have been taken. We would also seek for there to be guidance to assist EROs in this decision.

If Yes, do you think there are any risks in doing so? YES/NO

Please explain what these are.

Question 16

What do you think the issues with the current HEF are?
- Elector confusion – people believe they are registered after completing their details on a HEF not realising this is the first part of a two-stage process with them then having to complete an ITR to register.
- Size – too large and too much information. Currently A3, however A4 is an easier size to manage for the personal canvass and for the person completing the form, not to mention ERO processing.
- There are two designs for the HEF – pre-populated and blank. We are aware of some EROs only using the one template for populated and not populated. Consideration should be given to whether is it possible for there to be just one design.
- There is too much information on page 1 and evidence that residents are not reading the accompanying letter.

Question 17

Is there information that can be taken out of the HEF?
- The number of lines available for names to be added could be reduced.
- Pre-populated HEF doesn't need to include postal voting arrangements
- Postal vote information at the end of the HEF doesn't need to be included as it will be included on the ITR
- Reduce the wording on page 1 (letter)
- Word optional should be reconsidered regarding contact details. We would advise that consideration is given to how the register to vote website has been changed to encourage citizens to provide contact details.

Question 18

Is there any further feedback you would like to provide in relation to the proposed new model for the annual canvass, that has not already been covered in another question?

We welcome the Government's work to revise the current annual canvass process and deliver benefits to both citizens and local authorities. Whilst supporting the proposals, there are some areas worthy of further consideration.

UPRNs
We understand that the national data match will be based on UPRN's only and will not use both the UPRN and address string to match as was the case for the introduction of IER.

As a result, the Cabinet Office will need to send appropriate early messaging to EROs to ensure they have UPRNs against all of their properties. We are aware that some EROs do not have full coverage and making it clear the necessity for the UPRNs to be in place is imperative for successful canvass reform is of clear importance.

Skillsets within Local Authorities and Electoral Management Software
At present some EROs are not able to carry out local data matching due to the lack of software functionality, skills, resources or availability of data. The Cabinet Office will need to provide support, guidance and funding to EROs to enable them to successfully conduct local data matching. We would also urge the Government to liaise with key stakeholders who maintain databases, such as Council Tax records, to enable reports to be written that can be automatically loaded into EMS systems without individual local authorities having to speak to their suppliers on a case by case basis.

Streamlining the HEF process
Whilst we support the ability for the citizen completing the HEF to also register in one seamless process, the wording on the communication would need to consider that if they do not have their NINO to hand they can still complete the HEF and then complete their registration at a later stage. Otherwise we fear the completion of HEF may be reduced.

EMS Suppliers
Canvass reform will be reliant on EMS suppliers and we have concerns as to ensuring they have sufficient time to develop the functionality and ensure adequate user testing.

National Data Matching
Whilst we are pleased to learn there will be less restrictions on EROs sending their data to the DWP than there were when IER was introduced, we would welcome further details on the process and the timescales that EROs will have to work within.

ERO flexibility

Consideration should also be given to allow for the ERO's discretion whether to conduct a full canvass at any stage, permitting ERO's to do what they feel is necessary in light of prevailing local circumstances.

Other comments

In addition, we have highlighted below a couple of recommendations from our 2017 post-election report "It's time for urgent and positive Government action - The AEA's review of the 2017 local government elections and the UK Parliamentary general election" that could be considered as part of the canvass reform project. In the case of recommendation 2017-15 this would assist canvass reform with the provision of email addresses:

Recommendation 2017 – 14

As part of its immediate work programme, Cabinet Office should include workstreams that will:

- Deliver an effective resolution to the ongoing issue of duplicate registrations;

- Develop and extract management information from electoral management software systems that will be of assistance to EROs in the management of their electoral registers;

- Reduce bureaucracy in registration processes, both during and outside of canvass periods;

- Enable the better sharing of data in order to simplify registration processes;

- Deliver an effective solution to the registration of individuals in establishments such as universities, colleges, residential care homes and houses in multiple occupation.

The Cabinet Office should also set out a clear timetable of when each of these issues will be considered.

Recommendation 2017 – 15

The provision of an email address should be made mandatory for all applications to register to vote made through the digital service.

Finally, please let us know who you are and how we might contact you:

Name	Peter Stanyon
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Please return the completed questionnaire by 5pm 30th November to: mrd-engagement@cabinetoffice.gov.uk

Many thanks.