

# The Association of Electoral Administrators



## Response to the Electoral Commission consultation on draft performance standards for Electoral Registration Officers

**Organisation:** Association of Electoral Administrators (AEA).

**Summary of Organisation:** The Association of Electoral Administrators (AEA) was founded in 1987 and is the professional body representing the interests of electoral administrators in the United Kingdom. It is a non-governmental and non-partisan body and has just under 2,000 members, the majority of whom are employed by local authorities to provide electoral registration and election services. There are eleven branches of the Association covering the United Kingdom.

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## About the draft standards

### Questions

- Do you think the draft standards will support EROs with understanding and improving their own performance?

Yes

### Comments

The Association welcomes the change in approach with the standards being used by EROs and the Electoral Commission throughout the year (including in the lead-up to electoral events) and therefore removing the focus of the 1 December revised register publication date. This will provide a clearer understanding of performance and the year-round nature of ERO duties.

It should be noted that with the introduction of canvass reform in the summer of 2020 the standards' activities and data may need reviewing following the experiences and lessons learnt after canvass reform. In addition, once the future integrity legislation is introduced, they will also need to be reviewed to take account of those changes.

- Do you think the standards will enable the Commission to understand the performance of EROs and to identify where support and challenge is needed?

Yes

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## Comments

While we believe performance standards are the most efficient approach to broadly understand the ERO landscape, there may be instances where they do not identify an individual's need for support.

The paper outlines that the Electoral Commission will *'work with all EROs and their teams at least once every two years, but within this we will prioritise the order, frequency and intensity of the engagement based on risk. As currently, in determining risk we will take into account a range of factors, including the experience of the ERO, any significant changes in staffing in the electoral registration team, any known issues with the delivery of electoral registration activities, and other relevant local circumstances'*. There will be a need for the Electoral Commission to work closely with key stakeholders to understand where support and challenge is needed. There could be electoral teams struggling and going unnoticed as they don't meet the criteria for more frequent assessment. Likewise, there may be local authorities that meet the criteria with a new ERO and/or new Electoral Services Manager who has numerous years' experience and may not need the additional support. It must also be recognised that many changes can happen within two years.

Following the introduction of canvass reform, the arrangements in relation to electoral registration funding will be different and the possible lack of resources may be an issue as funding is withdrawn, especially if the full benefits of canvass reform changes are not achieved within an ERO area. This could affect the amount of funding available for public engagement and impact on the ERO meeting the performance standards.

We need to be clear what the Electoral Commission envisages by 'support' and to manage EROs' expectations as to the assistance that may be available to them and from whom. A range of additional support may be required with canvass reform and the need for increased use of local data. This could include being able to share experiences and ideas with peers, informal and formal advice and guidance, and potentially further resource, IT and financial support.

It should also be recognised that administrators have varying levels of experience within the profession. With the high level of turnover in the electoral field, on occasion, staff with limited experience are having to be recruited. The AEA national and regional branch structure provides a valuable and well-established network for sharing experiences, information and good practice, all of which provide support for individual electoral administrators. In addition, the AEA also provides training in electoral registration and the annual canvass for electoral administrators at all levels. We would welcome conversations about how support could be given using a more holistic approach to ensure electoral administrators' needs are fully met.

- **Are the standards focussed on the right outcomes? If not, what outcomes should be reflected?**

Yes

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## Comments

Our only comment is, there appears to already be some confusion regarding 'Outcome: Stakeholders and electors have confidence in the integrity of the electoral registers'. This seems to relate to integrity in terms of ensuring there is no fraudulent registration but is actually about publication and supply. We would suggest reconsidering the outcome title.

- Do the draft standards demonstrate a clear link from inputs through to the overall outcomes?

Yes

## Comments

As outlined above, following the introduction of the canvass reform and future integrity legislation changes the inputs may need to be reviewed.

- Do the standards focus on the right activities? If not, what activities should be included?

Yes

## Comments

Overall, the standards do focus on the right activities, however we have the following comments:

- Reference is made to the number of ITRs sent and followed up, however, it would it be beneficial to know the following information:
  - The number of ITRs outstanding after the reminder and personal visit stages.
  - The number of electors not verified and awaiting documentary evidence/attestation route.
  - The number of names removed from the system having been identified from a HEF or other data sources but failed to register online or complete an ITR.

Do you have any thoughts on the measurability of the impact of the activities set out in the draft standards?

Yes

## Comments

The standards list the following:

### **Electoral Register**

- *Numbers of additions as a result of different targeting approaches* – how will the additions be identified from the different targeting?

- *Evaluation of public engagement activities undertaken, including of changes made to the register as a result of the activity – how will the changes made to the register be identified?*

Given the number of electors registering online, it is now more difficult than ever to identify the reason for registration activity and therefore evaluate it.

- *Assessment of the numbers of electors who tried to vote on polling day but were unable to do so as a result of not being registered to vote – this would require polling station staff keeping a record. As good practice some polling station staff will already collect details so that they can be invited to register for future elections. It is worth bearing in mind that the fact that someone is not registered does not mean the ERO has failed in their duty. It could well be that the person concerned did not take the necessary action to register in time or is ineligible to vote in the election.*

## **Absent Voting**

- *Outcome: Absent voting is accessible, ensuring that everyone who is eligible and wants an absent vote is included on the relevant absent vote list – in a scheduled poll when the key dates are known an ERO can actively target the electorate and encourage them to engage and therefore the standards and KPIs can easily be met. This becomes more challenging with a national unscheduled poll, for example, with only a five or six week lead in to the polling date which only allows a limited timescale to advise people of an election or to be able to set out a budget and resources for a process which is not funded as part of the Maximum Recoverable Amount for the national poll. There is also a reliance of communications and messaging to the public via the EC and the gov.uk websites.*
- *Number and type of complaints received about ability to access the absent vote process – will the reason for the complaint also be gathered? There may be several reasons for the complaint, including those that relate to legislative restrictions. In this instance there is very little, if anything, an ERO can do and therefore we would hope you could distinguish between the type of complaint.*
- *Evaluation of information made available to electors on the absent voting process to help them understand the options available to them – will support be provided to help EROs understand how the evaluation should be done and what actions they can take as a result of the evaluation?*
- *Number of changes to voting arrangements processed – will the electoral management software systems have the functionality to export the number of changes?*
- *Number of emergency proxy applications – at present some EMS systems are not able to distinguish between an ordinary proxy and an emergency proxy. As a result, EMS functionality will be required. It would also be beneficial to know the number of applications by category, especially when considering integrity*

issues, for example, the number of applications from those reporting to be self-employed.

Do the standards cover the full range of responsibilities of the ERO? Are there any gaps or is there anything included that shouldn't be there?

Yes

Comments

No further comments.

## Using the standards: Electoral Registration Officers

### Questions

- Do you think the standards and the types of additional tools the Commission intends to provide will support EROs to understand and report on their own performance?

Yes, in part. For example, will the Electoral Commission help with evaluation?

Comments

The consultation paper highlights that the Electoral Commission '*will continue to work closely with Cabinet Office as part of the preparations for the introduction of canvass reform to ensure the relevant data can be easily accessed by EROs when they need it.*'

The exporting of management information from the electoral management software system will need to be available at polling district level at the various stages to maximise the full benefits for ERO's.

- Are there any other additional tools and guidance that would help to support EROs in using the standards?

Yes.

Comments

Evaluation tools would help support EROs in using the standards.

## Using the standards: the Electoral Commission

### Questions

- Will our proposed approach to how we engage with EROs and their teams enable us to provide effective support and challenge?

Yes

Comments

The proposed approach outlined in the consultation paper is welcomed. However, as highlighted above, the Electoral Commission will need to be aware that some electoral teams may not be caught with the two-year approach and may need the more

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frequent support. As a result, there will be the need for the Electoral Commission to work closely with other stakeholders to minimise risk.

- Is there anything more or different we should be using the standards to do?

No

## Comments

No further comments.

- Do you have any views on the proposed approach to reporting?

Yes

## Comments

When gathering information from EROs and their teams the Electoral Commission must be mindful of electoral cycles and other demands on the ERO and allow sufficient time to submit the information required. In addition, consideration needs to be given to other factors which may impact on an ERO achieving all the ERO performance standards. For example, in Wales they will be implementing the new franchise changes in addition to canvass reform which may impact on an ERO achieving all the new ERO performance standards.

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