Proposals for the Reform of the Annual Canvass

Response from the All Party Parliamentary Group on Democratic Participation[1]

Opening Remarks

1. The All Party Parliamentary Group (APPG) on Democratic Participation was setup in 2015 to 'serve as a platform to inspire democratic participation and innovation.' [2] It is a cross-party group, which includes representation from all political parties in Westminster. The Secretariat is Bite the Ballot.

2. In April 2016, the APPG published the report *Getting The 'Missing Millions' on to the Electoral Register.*[3] The report came as the system of individual electoral registration was nearing the completion of transition. The report drew attention to the 7.5 million of citizens who were estimated to not be correctly registered to vote at the time. The report set out 25 evidence-based reforms that could redress the problem.

3. Two core recommendations from the report have since been taken up in policy:

    Recommendation 3: "Prompt students to register when they annually enrol in college or university" was addressed with an amendment to the Higher Education and Research Act 2017; and

    Recommendation 10: "Government funding and support for National Voter Registration Drive" was addressed with the announcement of the National Democracy Week.

4. Following the completion of the transition to individual electoral registration, an academic evaluation found that its effects had included:[4]

    - Reduced opportunities for fraud
    - Improved accuracy rates
    - A popular and more user-friendly online registration system

    But also:

    - A more bureaucratic, two-stage, annual canvass for citizens
    - The completeness of the electoral register being reduced amongst younger electors and in London
    - Substantially higher administrative costs for central and local government
    - A substantially higher workload for electoral registration staff
    - A deteriorating workplace environment, with some staff experiencing more stress and an increased chance of leaving the profession.

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[1] Prepared by Dr. Toby S. James, Lead Fellow on Electoral Modernisation for the Group, Head of Politics at the University of East Anglia; and Mike Sani, Chief Executive of Bite the Ballot and Secretariat of the APPG.
[2] https://publications.parliament.uk/pa/cm/cmallparty/151223/democratic-participation.htm
[3] Bite the Ballot and Toby S. James (2016) *Getting the 'missing millions' on to the electoral register A vision for voter registration reform in the UK*. All Party Parliamentary Group on Democratic Participation: London. Available here.
[4] Toby S. James (forthcoming) *Comparative Electoral Management: Performance, Networks and Instruments.* Routledge: London and New York. Available from the author on request.

5. There therefore remains a need for continued modernisation of the electoral registration process because:

- There has not been a detailed studied of the completeness and accuracy of the register since the Electoral Commission's report rom 2016.[5] Estimates, however, suggest that the numbers missing from the electoral register is most likely to have increased significantly and not kept pace with population rises.[6]
- There is consistent evidence of voters being unable to cast their vote because of electoral registration issues.[7]
- There is considerable financial pressure on local authority budgets which is leading them to 'cut corners' with voter registration activities.[8]

6. The proposed reforms are broadly very positive steps towards the modernisation of the electoral registration process and are much needed:

- Recommendation 8 of the Missing Millions report was to ensure that Electoral Registration Officers were aware of the data sources available them and that these datasets were extended. The proposals therefore largely take this recommendation forward and is an important step for modernising the electoral register. Recommendation 25 was to introduce an automatic system of electoral registration for all eligible citizens. A move to automatic re-registration, that these reforms partially constitute, is therefore an important step forward in line with this principal.[9]
- It is important that the annual canvass is not abolished as it continues to be an important stage at which many people are registered to vote – and this is retained in the proposals.
- The proposals allow stretched resources to be targeted at under registered voters.

7. However, there are some further opportunities for reform. Some of the proposed aims of the project could be achieved through:

- **Introducing a national electronic register.** Missing Millions recommendation 24 was that the case for a single national electronic register should be reviewed. The government's proposals will require each electoral register to be uploaded to Individual Electoral Registration Digital Service which is the point at which the electors will be checked. There seems to therefore be a case for simply having one national electoral register, which could be locally updated, rather than retaining the Victorian system of a patchwork of registers across the country.
- **Investment in staff training and conditions.** The changes might have negative effects on the workplace experience of staff if training and adequate resources are not made available. Missing Millions recommendation 21 was to monitor the resources and workplace experiences of electoral service staff
- **Wider dataset use.** There are further opportunities to use other datasets to augment the electoral register. The document states that: 'We are currently exploring the potential to use

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[5] Electoral Commission. 2016. *Assessment of December 2015 electoral registers in Great Britain*. London: Electoral Commission.

[6] Toby S. James. 2018 'Are UK elections conducted with integrity, with sufficient turnout?' in Patrick Dunleavy (eds) The UK's Changing Democracy. London: LSE Press.

[7] Toby S. James and Alistair Clark. 2018 'Voter ID: our first results suggest local election pilot was unnecessary and ineffective' The Conversation, 2nd August 2018.

[8] Toby S. James and Tyrone Jervier. (2017) 'The cost of elections: The effects of public sector austerity on electoral integrity and voter engagement,' *Public Money and Management*, volume 37(7).

[9] Also see Political and Constitutional Reform Committee report on Voter engagement in the UK: https://publications.parliament.uk/pa/cm201415/cmselect/cmpolcon/232/232.pdf.

the Department for Work and Pensions' Customer Information System (DWP CIS). This dataset is already used in the electoral registration process to verify an applicant's identity. Other national datasets may also be used in the future.' Later it says that 'working with national data suppliers' (p.16). This is surprisingly vague on the national datasets that will be used. These should be extended to include credit reference agencies and other private sector sources.

- **Automatic registration.** There is an opportunity to automatically register under-registered groups as part of the annual registration process, rather than relying on responses to the annual canvass from them. This could include attainers when they receive their national insurance numbers (recommendation 25 of the Missing Millions report).

- **Strengthening funding and expanding transparency.** The funding of electoral registration services to implement the new system could be strengthened with greater transparency. Electoral Registration Officers are currently exempt from Freedom of Information requests. This could be changed as part of the legislation that is introduced to secure these reforms.

8. The revised system should be independently evaluated after implementation to ascertain the effects on a) completeness b) accuracy c) cost-efficiency and d) workplace effects on staff. There might be advantage in staggering the roll out so that implementation issues can be addressed.

9. The consultation asks for replies on important, but narrow technical issues, framed by the direction that the government has already set. Answers to these are provided below, but the above points are important to considering the wider approach to modernising the electoral registration process.

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.

A data matching process is already in place and mandatory to complete, in so far as electoral registration applications are required to provide national insurance numbers and checked against the DWP database.

It equally makes sense to allow local ERO's some discretion so that they can make the register as complete as possible.

However, it is important that a wider set of datasets are used at the national and local level so that electors who don't appear on one, can still be registered to vote. Datasets should go beyond the Department for Work and Pensions' Customer Information System (DWP CIS) to include information from credit reference agencies and other private sector sources. Each should be used proactively to ensure that the register is as complete as possible.

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.

It is logical that, if one elector in a property has 'failed' the checks, the other residents in the property should be checked. However, with large properties (such as care homes) it will be highly likely that one resident will be 'red' in a given year. This process could have a disproportional effect on such properties and categories of electors. It would therefore be worth making some exemptions for some categories.

Question 3

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

Please explain your reasoning.

It is important that all datasets are as accurate as possible, otherwise incorrect inferences could be drawn from them. However, it would be unwise to set an arbitrary figure as to what constituted a 'minimal level' in order for it to be considered 'accurate'. Instead, guidance could be produced to support Electoral Registration Officers in making choices so that the electoral register can be as complete as possible.

Question 4

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

Please explain your reasoning.

There will inevitably be properties which will legitimately meet this category and will have no eligible electors – however, the status of these properties should be reviewed with each canvass in case there is a change of purpose and occupation.

Question 5

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

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.

It would not seem an efficient system to citizen, if they registered, but were then asking to re-register shortly afterwards. Nor would it be a good use of resources. A period of two months seems reasonable.

If No, please explain your reasoning.

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.

This would seem to be a cost effective way of conducting the cavass. Under-registration rates are higher amongst young people, who are often the most online and technologically literate. It makes sense to enable them to use online technology for this purpose.

Question 8

Do you agree with the proposed process for Route 1? YES

Please explain why.

The current system is very resource intensive and research shows that local authorities are facing significant financial strain. Moreover, there is a common impression from citizens that because they pay their council tax, the local authority 'knows about them,' and they do not re-register. This process would therefore make considerable cost savings and improve the completeness of the register. Please also see the 'opening remarks' above.

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.

For the reasons set out in question 8 and the 'opening remarks'

Question 10

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

Please explain why.

It is important that in-person contact is still required in order to ensure that the register is as complete as possible.

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.

It is important that in-person contact is still required in order to ensure that the register is as complete as possible.

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.

The Missing Millions report recommendation 4 was that block registration is re-assessed. There has since been an amendment in the Higher Education Act 2017 to require universities to take a proactive approach to registering students. However, there seems to be a strong case that block registration is considered in some circumstances. This could include care homes and student halls of residence where there is a gatekeeper who already holds the necessary information. This would be a better use of resources and would improve the completeness of the register.

Question 13

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

If No, can you suggest an alternative approach?

See question 12

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.

Yes, it is important that these are sent into Route 2, otherwise some groups would be disadvantaged. They are likely to be among the least registered groups.

Question 15

Do you agree with the proposal that pending/potential electors should be included in the data matching and canvass communication? YES

If No, please explain why.

If Yes, do you think there are any risks in doing so? YES

Please explain what these are.

The purpose of the annual canvass is to ensure that the register is as accurate and complete as possible. This is a vital task in the electoral cycle. If there are individuals who are thought to be eligible to vote, but not on the register, then the Electoral Registration Officer should be required to take a proactive approach to contacting them and enrolling them.

In addition to this, there are some groups, which it might be more efficient for the ERO to directly register, such as attainers when they receive their national insurance number.

Question 16

What do you think the issues with the current HEF are?

The two-stage process is the main problem. Research shows that the public find it confusing that they are sent a HEF form, but then still required to register to vote afterwards.

The A3 size has also been reported to be a problem with local authorities needing to buy oversized scanners as part of the process.

Question 17

Is there information that can be taken out of the HEF?

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?

Please see the introductory comments

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

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