

**RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL**

**MUNICIPAL YEAR 2014-2015**

**CORPORATE SERVICES  
SCRUTINY COMMITTEE**

**5<sup>TH</sup> NOVEMBER 2014**

**REPORT OF THE DIRECTOR OF  
LEGAL & DEMOCRATIC SERVICES**

<b>Agenda Item No. 3</b>
<b>TRANSITION TO INDIVIDUAL ELECTORAL REGISTRATION</b>

**1. PURPOSE OF THE REPORT**

The purpose of this report is to inform Members of the progress made in relation to the transition to Individual Electoral Registration (IER)

**2. RECOMMENDATIONS**

It is recommended that Members:-

- (i) Note the content of this report.
- (ii) Scrutinise and comment on the information provided.

**3. BACKGROUND**

- 3.1 Members will be aware that the householder system of registering to vote has been replaced by Individual Electoral Registration. Under the old system the 'head of household' could register everyone who lived at their address. Everyone is now responsible for registering for themselves and for the first time this can be done on-line. Those wishing to register must now provide additional information for example National Insurance number and date of birth.
- 3.2 The new system was launched in England and Wales on 10<sup>th</sup> June 2014. A data matching exercise to compare existing electors' details with the details held on the Department for Work and Pensions (DWP) database – a process known as 'confirmation live run' (CLR) was undertaken in June. The purpose of this was to confirm the details held on the register and when they matched the elector was 'transitioned' onto the new IER register with no further action. The results of this 'live run' have now been published by the Electoral Commission and their report is appended for Members' consideration.
- 3.3 Rhondda Cynon Taf County Borough Council achieved a 95% match rate making it the best performing council in Wales and the fifth best across English and Welsh authorities.

- 3.4 The remaining 5% of unmatched electors and anyone whose circumstances have changed since June 10<sup>th</sup> will have to register by providing the additional information mentioned in 3.1 above.
- 3.5 Any households that did not respond to the canvas of electors in February 2014 were carried forward and are particularly at risk as they have to either begin a new registration or respond by completing a Household Enquiry Form.
- 3.6 The new register will be published on 1<sup>st</sup> December 2014.
- 3.7 The Electoral Commission will continue to monitor and report on progress with implementing the transition to IER.

# Analysis of the Confirmation Live Run in England and Wales

The implementation of Individual Electoral  
Registration: progress report

October 2014

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# Executive summary

## Background

In Great Britain, the household system of electoral registration has now been replaced by Individual Electoral Registration (IER) whereby each person is responsible for registering to vote individually. In addition, people can now register to vote online for the first time.

The transition to IER in England and Wales began in June 2014 with a data matching exercise to compare existing electors' details with the details held on the Department for Work and Pensions (DWP) database – a process known as 'confirmation live run' (CLR).<sup>1</sup>

Through this process, EROs were able to identify which electors could be transferred automatically to the new IER registers, and which ones could not and therefore need to re-register (although nobody will be removed from the electoral registers as a result of the change until the transition to IER is complete, in December 2015 at the earliest).<sup>2</sup> Electoral Registration Officers (EROs) were also able to carry out further data matching using local data sources to supplement the matching against the DWP database.

Following the confirmation process, the 'write-out' phase of the transition commenced, with EROs sending confirmation letters to those who had been confirmed and so automatically transferred onto the new IER registers and invitations to register to those who had not.

In Scotland, CLR took place from 22 September to 7 October, and EROs there are now proceeding to complete local data matching and commence the write-out processes. We will report separately on Scotland in November 2014.

## Confirmation live run and local data matching data analysis

### Headline results

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<sup>1</sup> A dry-run of this process – known as the 'confirmation dry run (CDR)' – was carried out in summer 2013.

<sup>2</sup> The end date for the transition to IER is set in legislation as December 2016 but the government can bring the date forward to December 2015.

Approximately 36.9 million electoral register entries were matched, the majority of which could be directly transferred onto the new IER registers.<sup>3</sup> This corresponds to 87% of the total number of records on the electoral registers sent for matching.

A total of 5.5 million electors could not be positively matched with the DWP database or through local data matching (LDM) and could therefore not be automatically transferred onto the new IER registers.

Overall, the results of the live run are encouraging. They are largely in line with the results from the test of the confirmation process in 2013 and mean that EROs can focus their time and resources on targeting the 13% of existing electors who could not be matched, as well as those not currently on the registers at all. These two groups include the 7.5 million people that the Commission has previously said are not registered at their current address – some of these will be on the register at a previous address and so may not have been matched through confirmation, while others may not be on the register at all.

However, the scale of the challenge still facing EROs varies across England and Wales as the proportion of electors matched at local authority and ward level varies considerably. Across local authorities it ranged from 59% in Hackney to 97% in Epping Forest and by ward the rate ranged from 7% in Oxford's Holywell ward to 100% in Lancaster's University ward.

In addition, while an analysis of the match rates is useful it does mask the impact of the varying size of electorates in different areas. For example, Cambridge has a marginally higher confirmation rate than Manchester but while that leaves approximately 26,000 unconfirmed electors in Cambridge there are 96,000 unconfirmed electors in Manchester. Some areas with relatively high final confirmation rates still therefore face a significant challenge, for example, Leeds achieved an 86% confirmation rate leaving it with 76,000 unconfirmed electors while Birmingham has an 81% confirmation rate and 143,000 unconfirmed electors.

We have produced a data visualisation tool which is available on our website and shows the confirmation rate for parliamentary constituencies and for local authorities (including the rates for the constituent electoral wards).

### **Electors types**

Positively, 93% of postal voters and 86% of proxy voters could be matched following DWP and local data matching and will therefore retain their absent vote entitlement without having to take any further action.<sup>4</sup> However, the

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<sup>3</sup> Not all 36.9 million will be automatically transferred as some will be carried forward records who cannot by law be automatically confirmed.

<sup>4</sup> Any existing electors who are not registered individually – whether as a result of confirmation or as a consequence of submitting a completed registration application – will lose their absent voting entitlement on publication of the revised register by 1 December 2014. They will, however, still be able to vote in a polling station at the May 2015 elections.

match rate for attainers has declined significantly since the test of confirmation. It is down to 52% from 86% in 2013. It is not clear why this has changed as the matching rules are largely unchanged between the two processes. There is consequently a challenge for EROs to ensure that their engagement strategies are updated to reflect the activity they will carry out to maximise the number of attainers who are registered individually, and working with schools and colleges within their area is a key area of activity we will expect EROs to explore.

## Local data matching

Of the total 36.9 million register entries matched, 33.7 million electors (79% of the total number of records on the electoral register) were matched with DWP data and an additional 3.2 million electors (7% of the total number of records on the electoral register) were matched through local data matching (LDM).

329 EROs reported undertaking local data matching while 19 did not (Appendix 1 of the report sets out the reasons why those EROs who did not use local data matching prior to commencing the write-out reached that decision). Some of these 19 are planning to carry out local data matching work later in the transition period.

Council tax information was, by far, the most commonly used data source. However other data used included that relating to local authority-administered benefits, such as housing benefit, as well as parking and educational data.

## Demographic analysis

Our analysis of the results of the 2013 confirmation dry run found that areas with significant populations of particular groups were likely to have low match rates. These groups – also associated with low levels of electoral registration – included young people (aged 20-29), those renting from a private landlord and students.

We suggested that this correlation was likely to be because people in these groups were less likely to have an up to date record on the DWP database which related to their current address – primarily because they change address, on average, more frequently than the general population.

Analysis of the live run DWP match rates against demographic data indicates that these patterns remain: areas with a higher concentration of private renters, young people, students and people not born in the UK had a lower match rate.

Positively, when this analysis is repeated with the results following local data matching, the correlations, between the proportion of particular groups and of unconfirmed electors, are weaker. The results therefore suggest that local data-matching may have helped to increase the number of electors from those demographic groups automatically transferred to the new registers.



# Progress with implementing the transition to IER

## Online registration

As part of the change to IER in Great Britain, a new system of online registration was launched on 10 June in England and Wales and on 19 September in Scotland. This allows people (excluding service voters or crown servants) to apply to register to vote online for the first time.

The system has worked well since go-live with no significant technical issues. The take-up of online registration has also been positive: the Cabinet Office has reported that 1.8 million people have so far<sup>5</sup> used the online service.<sup>6</sup> User satisfaction with the online service is high, averaging 93%.

Of all applications to register to vote under IER made since 10 June in England and Wales (and since 19 September in Scotland), approximately two thirds have been made via the online system, broken down by device as follows:

- PC – 67%
- Tablet – 18%
- Mobile – 15%

Encouragingly, given what is known about under registration among young people, the number of applications has been highest among the 25-34 age group.

## The write out

The write-out – when EROs send confirmation letters to those electors who have been confirmed and so automatically transferred onto the new IER registers, and invitations to register to those who have not - began on 3 July 2014 in England and Wales and will run until 30 November, prior to the revised registers being published by 1 December.

## IT issues

The delivery of IER is supported by some key IT systems – to match existing electoral registers against the DWP database in the initial ‘confirmation’

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<sup>5</sup> As at 16 October 2014

<sup>6</sup> This reflects the number of people who have submitted an application to register online, but these are not necessarily unique new applications to register. This figure will include applications made by people who have used this process to notify the ERO about changes to their details; to change their choice about whether or not they want to be included on the open register; and duplicate applications.

exercise; to check the personal identifiers on new applications to join the IER register against the DWP database in the on-going 'verification' process; and to allow people, for the first time, to apply online to join the register.

Each ERO has their own electoral management software (EMS) system that they use to manage and maintain their electoral register.<sup>7</sup> While each ERO is responsible for managing their EMS system and for the relationship with their EMS supplier, the Cabinet Office contracted directly with the four EMS suppliers for the changes that were needed to the EMS systems to reflect the change to IER.

There have been some issues with the functionality of the systems. These issues differ between EMS systems and have affected some – but not all – authorities, and in varying ways. This in itself is not entirely unexpected - the widespread roll-out of any new IT systems being operated locally by hundreds of individuals with a range of expertise and experience will in most instances result in some problems – and, fundamentally, we do not believe that any of these issues have or will cause long term problems for the successful delivery of IER.

However, although all EROs have now been able to send their confirmation letters, invitations to register and household enquiry forms (HEFs), in many cases there were delays to the start of write-out activity as a consequence of the software issues. Some EROs have experienced additional problems with identifying those electors or households who have not responded to the initial write-out and therefore will need to be sent reminders or receive a personal visit. The effect of these issues has been that many EROs have had to revise their write-out plans to take account of the reduced amount of time available for sending out reminders and carrying out personal visits before publication of the revised registers by 1 December 2014.

We do not currently believe that any of these delays have created significant long term problems and on the whole, the write-out is now progressing well. In considering the impact of the delays to the start of the write-out, it is important to keep in mind the 87% of the electorate who have already been confirmed and so need to take no further action on receipt of their confirmation letter.

There is, however, more work to be done and we anticipate that in some areas the processes for following-up with electors or households who have not responded to the write-out and canvass, which were initially planned to have been completed before the publication of the revised register by 1 December, will need to continue past that date. While the 1 December publication of the revised registers is a significant milestone, the process of maintaining accurate and complete electoral registers continues throughout the year and EROs will, in any case, need to continue to engage with

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<sup>7</sup> In England and Wales, all EROs use systems provided by external suppliers. In Scotland, a small number of EROs use in-house software systems.

individuals in their area to maximise registration, particularly in advance of the scheduled elections in May 2015.

We are continuing to work with EROs to support them in revising their plans where necessary and to confirm what arrangements they are putting in place to ensure that all necessary actions are completed and their registers are as accurate and complete as possible by the time of the May 2015 polls.

The Cabinet Office are liaising closely with the suppliers of the EMS systems in England and Wales whose users are experiencing problems to ensure that progress is being made to address issues. In Wales, there have been additional problems where software has not supported bilingual operations. We will continue to monitor progress with resolving those software issues that are still outstanding, and will provide an update in our next report in February 2015. If at any time before that point we believe that the software issues are such that there is a fundamental risk to the effective delivery of electoral registration services, we will say so.

## Public engagement activity

The data from the confirmation live run shows that the results, in the main, closely reflected the results of the dry run, on which EROs' IER engagement strategies and implementation plans were based. The challenges facing EROs are therefore largely as anticipated in terms of both the numbers of unconfirmed electors and of the groups of unconfirmed or unregistered electors they would need to target during the transition to IER.

We have and will continue to engage with EROs and their staff to monitor the progress with delivery of their plans and to provide guidance and support on the write-out process.

### **The Commission's campaign**

The Commission's advertising campaign was designed to complement EROs' local public engagement activity by ensuring that people knew to expect a letter and whether they needed to take any action. The campaign was therefore timed to coincide with the start of the write-out, based on the CLR schedule, when most people would be receiving their letters. It launched in England and Wales on 3 July and ran until 10 August.<sup>8</sup>

The overarching objective of the campaign was to encourage people to 'look out for your letter' that would tell them whether they needed to take action. The campaign ran across TV, websites, search engines, and outdoor advertising, as these were the communication channels that we had identified as most effective for reaching those individuals the confirmation dry-run results and other data identified as least likely to be confirmed.

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<sup>8</sup> The Commission's campaign in Scotland will run from 16 October to 13 November.

We have undertaken tracking research to evaluate the effectiveness of the campaign in England and Wales.<sup>9</sup> This found that:

- 54% of respondents recognised any element of our campaign, which meets our key performance measure (KPM) of between 50-60%
- 56% of respondents reported being aware of the change to the voter registration system, meeting our KPM of between 50-60%
- 72% of respondents stated it was true that they needed to look out for a letter about registering to vote from their local council, which exceeds our KPM of 40-50%

## Looking ahead

### Registration activity in early 2015

The publication of the revised registers by 1 December 2014 is a key milestone but is by no means the end of the process – EROs will continue to have work to do to ensure that their registers are as accurate and complete as possible by the time of the May 2015 elections.<sup>10</sup>

EROs will need to evaluate their public engagement strategies following the publication of the revised register by 1 December 2014 to understand what challenges remain locally. They will need to update their strategies to reflect the updated information about which groups of electors they need to continue to target in their areas and the evidence about the effectiveness of particular engagement activities. This information should be used as part of EROs' ongoing work to target electors who are not registered individually ahead of the scheduled polls in 2015, including electors who have lost their absent vote entitlement, to maximise the number of electors being able to vote using their preferred method of voting at the scheduled polls in May 2015.

We are currently in discussions with the Cabinet Office about potential for additional funding being provided to EROs to support them with their work to maximise registration between the publication of the revised registers and the May 2015 polls.

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<sup>9</sup> We will complete similar research to help assess the performance of our IER campaign in Scotland.

<sup>10</sup> The electoral registers are also used for other important civic purposes, including selecting people for jury service and calculating electorates to inform Parliamentary and local government boundary reviews which are the basis for ensuring representative democracy. People not registered are therefore not counted for these purposes either. In addition, credit references agencies may purchase complete copies of electoral registers, which they use to confirm addresses supplied by applicants for bank accounts, credit cards, personal loans and mortgages.

## Further monitoring and reporting

The Commission will continue to monitor and report on progress with implementing the transition to IER.

Our next report on the IER transition will be published in February 2015 and will be based on the results of our ongoing monitoring of performance as well as detailed, local authority-level data collected from every ERO after the publication of the December registers in England and Wales. A separate assessment for Scotland will follow in April 2015 following the publication of the registers by 2 March 2015.

This data will allow us to assess how the transition has progressed from the end of the confirmation exercise up to the publication of the revised registers. Although it will not allow for a full assessment of the accuracy and completeness of the registers at this point, it will allow us to answer crucial questions about the progress of the transition including:

- How many / what proportion of electors would be removed at the end of transition should they continue to fail to be registered individually?
- How many electors are registered for an absent vote on 1 December 2014?

Importantly, by collecting the data from every ERO in England, Scotland and Wales we will be able to see any significant variations across Great Britain.

In June 2015, we will report on our assessment of the effectiveness of the transition up to that point, with a view to informing the Ministerial decision, which will need to be taken very soon after the UK Parliamentary General Election in May 2015, on whether to bring the end point for IER transition forward from the current date in December 2016 to December 2015. The range of polls scheduled for 2016 means that everywhere in Great Britain will have elections on 5 May 2016 and we would want to be satisfied that particular areas are not going to have significantly worse levels of registration than others before making any recommendation on bringing forward the end point of the transition.

Our assessment will be underpinned by a clear understanding of what the effect on the registers would be of ending the transition in December 2015 and therefore removing those electors not yet registered individually at that point.

In order to ensure our assessment is as up-to-date as possible we will again collect local authority-level data from all EROs immediately after the last date for registering ahead of the May 2015 UK General Election. This data will be similar to that collected in December 2014 (March 2015 in Scotland).

Throughout this period, the Commission will continue to work to support the effective delivery of the transition. We will be carrying out a public awareness campaign in the run-up to the May 2015 elections, which will focus on

encouraging people to register to vote ahead of the registration deadline. As part of the move to IER, the Commission has also been building partnerships with a range of organisations to help reach its target audiences. We are determined to do everything we can to maximise registration and we believe that the UK Parliamentary election will provide a great rallying point for us – and others working in this area – to ensure that as many people are registered as can be.

We will also work with the UK Government and EROs to explore potential opportunities to enhance the new registration system, such as the option to use some form of confirmation to support the electoral registration process beyond this initial stage. We will assess the detailed practical implications of possible new processes, including as a priority considering whether it would be feasible to introduce any legislative and operational changes required in time to support the autumn 2015 household canvass programme.

The experience of using data to verify the identity of potential electors without requiring them to provide additional information also highlights the potential for direct registration (i.e. using trusted Government/public sector data to identify potential electors and then add them to the register without requiring them to complete an application form). We will work with the UK Government and EROs to further explore the feasibility and implications of using a direct registration approach for electoral registration in the UK.

# 1 Introduction

1.1 Previously, one person in every household was responsible for registering all eligible electors living at that address. This household registration system has now been replaced by Individual Electoral Registration (IER) whereby each person is responsible for registering to vote individually. In addition, the ability to register online is now in place.

1.2 The transition to IER in England and Wales began in June 2014 with a data matching exercise to compare existing electors' details with the details held on the Department for Work and Pensions (DWP) database – a process known as 'confirmation live run' (CLR).<sup>11</sup> EROs were also able to carry out further data matching using local data sources to supplement the matching against the DWP database. Through this process, EROs were able to identify which electors could be transferred automatically to the new IER registers, and which ones could not and therefore need to re-register. Nobody will be removed from the electoral registers as a result of the change until the end of the transition.

1.3 From 3 July 2014, the 'write-out' phase commenced, with EROs sending confirmation letters to those who had been confirmed and so automatically transferred onto the new IER register and invitations to register to those who had not.

1.4 Alongside the write-out to existing electors, EROs have also been canvassing empty properties and sending 'household enquiry forms' to addresses where they believe this will enable them to identify any potential eligible electors who are not already registered to vote at that address and invite them to register, or to identify whether or not electors currently registered at the address continue to reside there.

1.5 In Scotland, CLR took place from 22 September to 7 October, and EROs there are now proceeding to complete local data matching and commence the write-out processes.

## This report

1.6 Throughout the transition to IER the Commission will be monitoring progress and collecting data from Electoral Registration Officers (EROs) to enable us to assess and report on the impact of the transition. This is the first in a series of reports we will be publishing throughout the transition. It is based on data collected from EROs in England and Wales on conclusion of the first stage of the transition – the confirmation live run (CLR) exercise – and summarises what has happened since the start of the transition in June. We

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<sup>11</sup> A dry-run of this process was carried out in summer 2013.

are currently collecting data from EROs in Scotland and will report our analysis of the results in November 2014.

1.7 This report contains an analysis of the results of the matching of existing electors' details against the DWP database and local data matching carried out by EROs in England and Wales, the outcomes of which can be found in **Chapter 3**.

1.8 **Chapter 3** covers the progress of the transition to IER so far in England and Wales, including the performance of the supporting IT systems. It also summarises the findings of our evaluation of the public awareness campaign the Commission ran between 3 July and 10 August throughout England and Wales to support EROs' local public engagement activity.

1.9 **Chapter 4** summarises the next stages in the transition to IER and provides an outline of what further data we will collect and when, and what this should tell us about the progress being made.



## 2 Confirmation live run and local data matching data analysis

2.1 This chapter sets out the results of the confirmation live run and subsequent local data matching work carried out by Electoral Registration Officers (EROs).

### Confirmation of existing electors

#### Process

2.2 As part of the planned roll-out of IER, the Cabinet Office developed a CLR schedule to enable all 348 EROs in England and Wales to upload their electoral registers to the IER Digital Service (DS) on a rolling basis.

2.3 The CLR schedule was developed based on the results of the confirmation dry-run (CDR) carried out in summer 2013, taking into account the size and scale of the registers and the expected volumes of unconfirmed electors, so the largest authorities and those authorities with lower CDR match rates would go through the process first. The schedule was released to EROs in advance enabling them to finalise the details of their local plans based on their CLR dates.

2.4 Originally CLR was to begin on 10 June, the same day as IER was introduced in England and Wales and the online registration service was launched. A further change was made at the beginning of April 2014 to move the start of CLR from 10 to 12 June, to reduce the likelihood of any issues arising when the online registration service – which also used the IER DS – was launched on 10 June having an impact on the CLR. In most cases this meant that each ERO's upload date was one working day later than originally planned.

2.5 CLR began in England and Wales as scheduled on 12 June. The data from the registers was extracted from the electoral management software (EMS) systems and sent, via the IER DS, to be matched against the DWP database. The results of that matching were then returned to the IER DS for EROs to download back into their EMS systems with an agreed turnaround of five working days.

#### Approach to matching

2.6 Using the matching rules/algorithm developed through the confirmation dry run in 2013, DWP matched each register entry against data on their Customer Information System database (CIS). Based on the matching results, each elector was marked with a 'RAG' status:

- **Green:** following a positive address match, the individual's name was matched positively or with a minor fuzzy match<sup>12</sup>
- **Amber:** following a positive address match, the individual's name was matched partially
- **Red:** the address could not be matched or, following a positive address match, the individual's name could not be matched

2.7 Red matches may be the result of out of date information on either the electoral registers or the DWP database and higher levels of red matches in an area do not necessarily mean the electoral register for that area is less accurate. The variation in matching results shown below is, in part, related to varying levels of population mobility because in areas with higher population mobility there is a greater chance that either the electoral register or the DWP database will contain out of date information.

2.8 However, that does not mean that red matches are not often a 'valid' result. In many cases the person listed on the electoral register at a given address will fail to match because they have moved from the property.

2.9 EROs received the results of the matching process through the IER DS, directly into their Electoral Management Software (EMS) systems. Once they completed their analysis of the results, EROs could decide whether to carry out further local data matching (LDM) by using local data sources (such as council tax records) to increase the number of electors whose details could be confirmed and who could therefore be transferred onto the IER registers.

2.10 Ministerial guidance, which EROs must have regard to, set out the considerations that EROs should take into account in determining whether to conduct LDM as part of the confirmation process, which included an assessment of the costs and benefits of doing so in their local area based on factors such as: the capacity and capability that would be needed to carry out LDM effectively; the availability and robustness of local data sources; the likely benefits (for example, if the number of electors matched against DWP data is high the potential benefit of local data matching is proportionately low), and whether there would be sufficient time to carry out and act on the results of LDM within the local timetable for the write-out.

2.11 The methods and processes adopted for conducting local data matching therefore varied significantly across different areas. For example, some local authorities checked a selection of red and amber electors while others verified all entries on the register; some used an automated matching system while others carried out manual checks or a combination of the two.

## IT systems

2.12 Ahead of the start of IER and the confirmation exercise, each ERO needed to have their local Electoral Management Software (EMS) system

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<sup>12</sup> A fuzzy match would be, for example, where a minor misspelling in a name such as transposing two digits, prevents a full match being achieved.

connected to the central IER DS. Initial experience from the CDR in 2013 suggested that there would be a range of mostly minor issues that may have meant many of these connections could not be established. In our March 2014 report on readiness for the transition to IER we said that the Cabinet Office and EMS suppliers must manage this roll-out closely and ensure that all issues are immediately and successfully dealt with.

2.13 The roll-out of connectivity worked well in England and Wales. The majority of EROs' systems were able to be connected in time for them to upload their registers for matching and begin the confirmation process according to plan. In a minority of cases, the upload date was put back by a few days while local connectivity issues were resolved. Those EROs whose uploads were delayed had their upload re-scheduled quickly by the Cabinet Office team and were able to download their CLR data according to the original schedule.

2.14 The IT systems and connections also worked well in terms of EROs downloading their registers following data matching against the DWP database.

2.15 There have been subsequent issues with the provision of results from the CLR process (see paragraphs **2.20** to **2.22** below) but these had a limited impact on the process itself.

## Headline results

2.16 The results presented below are based on data produced by the 348 EROs in England and Wales (326 in England, 22 in Wales) through their EMS system and provided to Cabinet Office.

2.17 Overall, the results are largely in line with the results from the dry run of confirmation.<sup>13</sup> This is encouraging as it means that the plans EROs developed using that data will still be robust. The data from the live run shows that **following DWP and local data matching**:

- Approximately 36.9 million electoral register entries were matched, the majority of which could be directly transferred onto the new IER registers.<sup>14</sup> This corresponds to 87% of the total number of records on the electoral registers sent for matching.
- The above number comprises 33.7 million electors (79% of the total number of records on the electoral register) that were matched with DWP data and an additional 3.2 million electors (7% of the total

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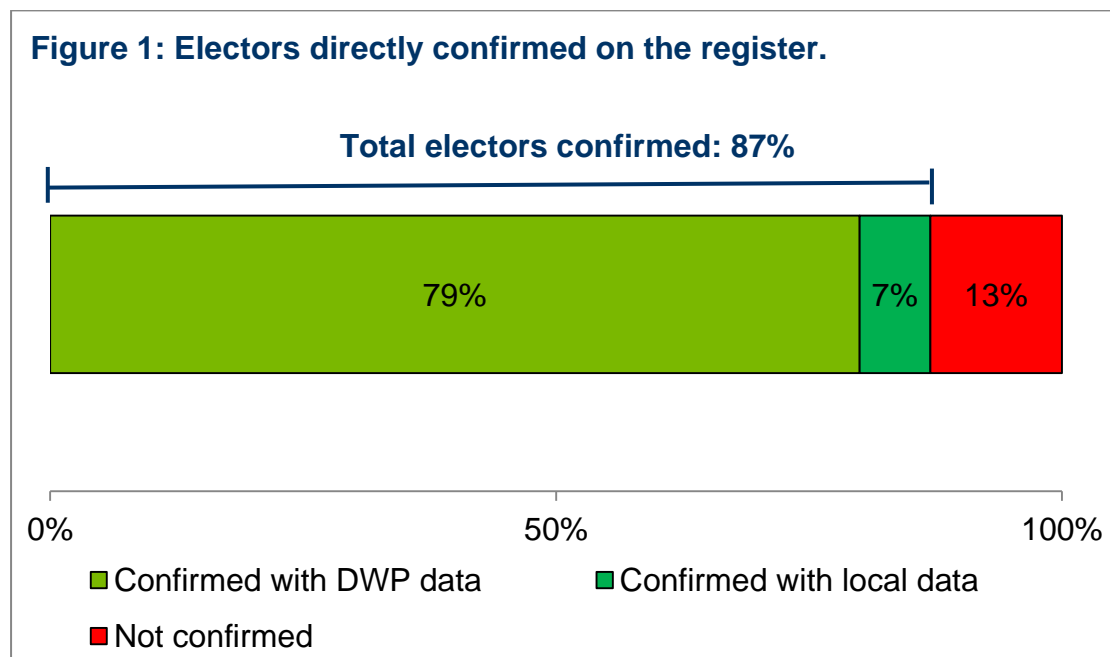
<sup>13</sup> [http://www.electoralcommission.org.uk/\\_data/assets/pdf\\_file/0019/163144/Confirmation-Dry-run-2013-Results-report.pdf](http://www.electoralcommission.org.uk/_data/assets/pdf_file/0019/163144/Confirmation-Dry-run-2013-Results-report.pdf)

<sup>14</sup> Not all 36.9 million will be automatically transferred as some will be carried forward records – see paragraphs 2.21 – 2.23 for an explanation.

number of records on the electoral register) that could not be matched with DWP data but were matched through local data matching (LDM).

- A total of 5.5 million electors could not be positively matched with the DWP database or through LDM and could therefore not be automatically transferred onto the new IER registers.
- The proportion of electors matched at local authority and ward level varies considerably. Across local authorities it ranged from 59% in Hackney to 97% in Epping Forest and by wards the rate ranged from 7% in Oxford’s Holywell ward to 100% in Lancaster’s University ward.<sup>15</sup>
- These headline results are consistent with the results from the test of the confirmation process in 2013.

2.18 Overall, the results of the dry run are encouraging although as noted above, and further below, the scale of the challenge varies significantly across England and Wales. The results are largely in line with those from the test of the confirmation process in 2013 and mean that EROs will be able to focus all of their time and resources on the 13% of existing electors who could not be matched as well as those not currently on the registers at all. These two groups include the 7.5 million people that the Commission has previously said are not registered at their current address – some of these will be on the register at a previous address and so may not have been matched through confirmation, while others may not be on the register at all.



<sup>15</sup> The ERO for Lancaster used data from the University Registrar to increase the match rate in University ward from 0.3% following DWP matching to 100% following local data matching. The ERO understands that some of the electors confirmed will be students who are no longer resident on campus (e.g. they completed their degree in June 2014 and will not return to the campus in September/October) and will be following up with the university in order to access more up to date information after the start of term. This will allow them to start the process of removing from the register those students who have left campus.

2.19 We have also produced a data visualisation tool which is available on our website and shows the confirmation rate for parliamentary constituencies and for local authorities (including the rates for the constituent electoral wards).

### Data limitations

2.20 These figures are based on data provided by each ERO in England and Wales, collected by Cabinet Office. There were discrepancies in the data, some of which could be reconciled and some which could not.

2.21 Carried forward entries cannot by law be automatically transferred onto the new IER registers even if they have been matched as there is an increased risk of their entry being out-of-date. They can, however, be confirmed if the name is subsequently included on a returned household enquiry form (HEF).<sup>16</sup>

2.22 It has not been possible to determine reliably, for each ERO's area, whether electoral register entries which were carried forward as a result of non-response to the previous canvass have been included in the headline figures of those matched/confirmed. Some local authority and ward-level match rates may therefore include carried forward records while others will not.

2.23 However, the impact on the England and Wales match rate is not likely to be significant as there were 1.1 million carried forward records in total following the 2013 canvass (from a total electorate of over 42 million). The available data from the live run suggests that approximately 50% could be matched against DWP data (separate data was provided on carried forward records). Some, not all, of that approximately 500,000 (those carried forward records successfully matched) will therefore be included in the headline match rate for England and Wales but with limited impact on the national match rate.

## Matching with DWP data

2.24 The results of the matching of existing electoral register entries against the DWP database indicate that:

- A total of 42.4 million electoral register entries were sent for matching against the DWP database
- 33.7 million were marked as green: this corresponds to 79% of the total number of entries sent for matching
- 1.2 million were marked as amber (3%)
- 7.5 million were marked as red (18%)

### Geographical variation

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<sup>16</sup> An explanation of the provisions relating to electors who were carried-forward at the conclusion of the 2013 canvass is available in Part 3 of our guidance for EROs: 'The transition to IER in 2014/2015' at paragraph 4.26 onwards, and paragraph 8.25.

2.25 There was a significant variation in match rates across local authorities and electoral wards. The tables below sets out the areas with the highest and lowest match rates against DWP data.

**Table 1: Lowest match rates by local authority**

Local authority	DWP match rate
Kensington and Chelsea	48%
Westminster	49%
Camden	52%
Hammersmith and Fulham	54%
City of London	54%
Lambeth	57%
Oxford	60%
Islington	60%
Wandsworth	61%
Hackney	61%
Haringey	61%
Cambridge	61%

**Table 2: Highest match rates by local authority**

Local authority	DWP match rate
North East Derbyshire	86%
Havant	86%
Barrow in Furness	86%
Ashfield	86%
Broadland	86%
St Helens	86%
Rotherham	86%
Tamworth	86%
South Tyneside	86%
Rochford	86%
Blaby	87%
Dudley	87%

2.26 The variation by ward was larger (as was the case in the confirmation dry run) with 48 wards recording a match rate of 90% or higher.

2.27 The table below shows the wards with the lowest match rates, all of which are areas with significant student populations (for further analysis by demographics see paragraphs 2.462.55).

**Table 3: Lowest match rates by ward**

Local authority	Ward	DWP match rate
Lancaster	University	0%
Oxford	Holywell	7%
York	Heslington	11%
Newcastle under Lyme	Keele	15%
Oxford	Carfax	18%
Ceredigion	Aberystwyth	20%

	Canol/Central	
Cambridge	Market	23%
Liverpool	Central	24%
Manchester	City Centre	25%
Durham	Elvet and Gillesgate	27%

## Local data matching

2.28 Based on the information reported to us from Cabinet Office, key results from local data matching were as follow:

- 329 EROs reported undertaking local data matching while 19 did not. Appendix 1 sets out the reasons why those EROs who did not use local data matching prior to commencing the write-out reached that decision and summarises what action they are undertaking to ensure that they can maximise the number of electors who are registered individually
- Council tax information was, by far, the most commonly used data source. However other data used included that relating to local authority-administered benefits, such as housing benefit, as well as parking and educational data
- 3.2 million additional matches were made as a result of checks with local databases<sup>17</sup>
- Local data matching therefore increased the percentage of electors confirmed by approximately 7%

### Geographical variation

2.29 As with the initial DWP match rates, there was substantial variation in the final level of matching between local authorities and wards. The tables below set out the areas with the highest and lowest match rates following local data matching.

**Table 4: Lowest match rates by local authority**

Local authority	Post-LDM match rate
Hackney*	61%
Isles of Scilly	69%
Brent*	69%
Reading*	70%
Kensington and Chelsea	71%
Oxford	71%
Cambridge	71%
Haringey	72%
Redbridge*	74%
Windsor and Maidenhead*	75%

<sup>17</sup> At the time of reporting an additional, approximately, 55,000 electors were classed as 'undecided' by EROs. Some of these electors may subsequently be confirmed by additional data matching activities but for the purposes of reporting they are assumed to be unconfirmed. The number is too small to make any notable difference to the headline figures.

Manchester	75%
City of London	75%

\*Did not conduct local data matching

**Table 5: Highest match rates by local authority**

Local authority	Post-LDM match rate
Waveney	94%
Eden	94%
Wychavon	94%
South Norfolk	94%
Rochford	94%
Dudley	94%
St Helens	94%
Surrey Heath	94%
Doncaster	94%
Blaby	95%
Castle Point	95%
Rhondda Cynon Taf	95%
Barrow in Furness	95%
Huntingdonshire	96%
Halton	96%
Epping Forest	97%

2.30 An analysis of the match rates is useful but it does mask the impact of the varying size of electorates in different areas. For example, Cambridge has a marginally higher confirmation rate than Manchester but while that leaves approximately 26,000 unconfirmed electors in Cambridge there are 96,000 unconfirmed electors in Manchester. Some areas with relatively high final confirmation rates still therefore face a significant challenge, for example, Leeds achieved an 86% confirmation rate leaving it with 76,000 unconfirmed electors while Birmingham has an 81% confirmation rate and 143,000 unconfirmed electors.

2.31 It is also worth noting that the impact of local matching varied significantly between areas. The table below shows the local authority areas with the largest increases in their match rates as a result of local data matching. All except for Bournemouth are London authorities.

**Table 6: Highest increase in number of electors confirmed after local data matching.**

Local authority	DWP match rate	Post-LDM match rate	Increase
Bournemouth	72%	87%	16%
Southwark	76%	93%	16%
Richmond upon Thames	63%	79%	17%
Ealing	71%	89%	18%
Lambeth	57%	77%	20%
City of London	54%	75%	21%
Kensington and Chelsea	48%	71%	24%



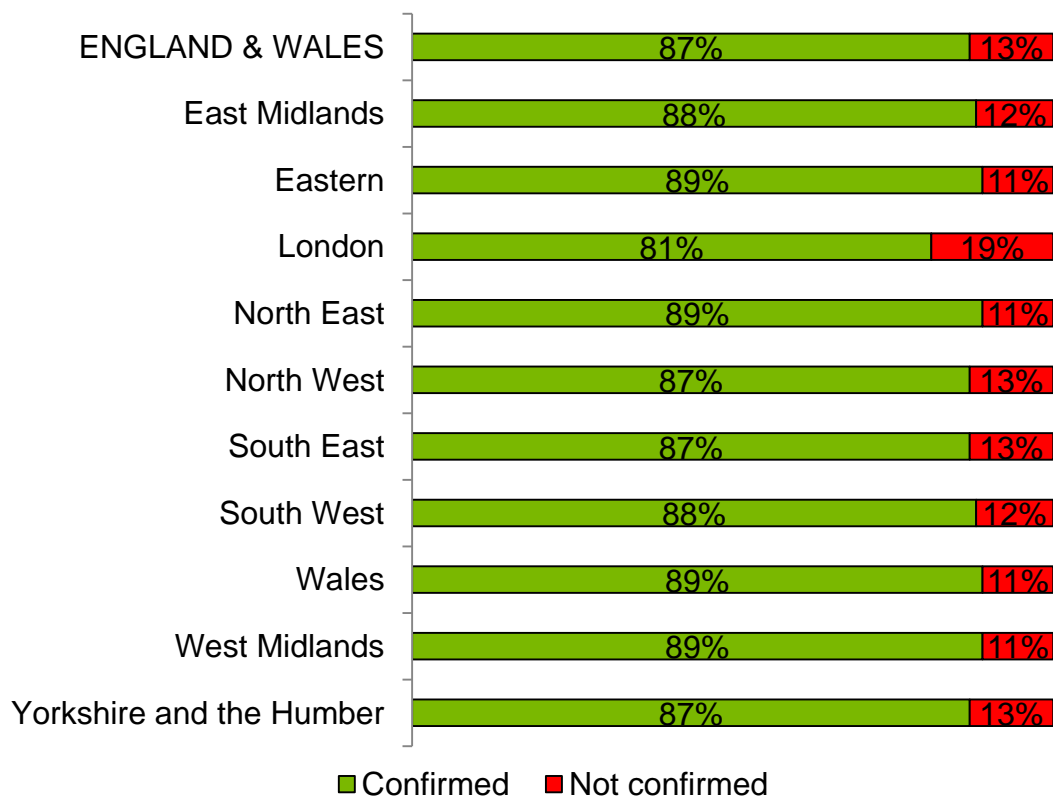
Camden	52%	79%	27%
Hammersmith and Fulham	54%	82%	28%
Westminster	49%	81%	32%

2.32 The level of variation is likely to be due to a number of factors including the level of matching originally achieved with DWP, the different methods used for local data matching (whether automatic with an algorithm or manual) and the resources available at local level to deliver this (which impact on the number of records that can be checked), the criteria adopted to accept a match or not and the number and quality of available local databases.

2.33 However, the post-LDM match rate across most English regions and Wales varies only slightly – by 2% between 87% and 89% - although in London it is lower at 81% post-LDM. Table 7 below sets out the full details.

2.34 The degree of variation, and to what extent it is addressed during the rest of the transition process, is one of the key elements we will take into account when making our assessment on whether the end date for IER should be brought forward from December 2016 to December 2015.

**Figure 2: Final match results by country and English region.**



**Table 7: Final match results by country and English region.**

Region	Total number of register entries	%		Number	
		Confirmed	Unconfirmed or Undecided <sup>18</sup>	Confirmed (million)	Unconfirmed or Undecided
East Midlands	3,465,943	88%	12%	3.1 million	408,000
Eastern	4,499,597	89%	11%	4 million	484,000
London	5,924,770	81%	19%	4.8 million	1.1 million
North East	1,983,104	89%	11%	1.8 million	212,000
North West	5,364,730	87%	13%	4.7 million	715,000
South East	6,617,536	87%	13%	5.8 million	864,000
South West	4,121,125	88%	12%	3.6 million	500,000
Wales	2,304,930	89%	11%	2.1 million	251,000
West Midlands	4,190,559	89%	11%	3.7 million	480,000
Yorkshire & Humber	3,951,892	87%	13%	3.5 million	506,000
<b>Total</b>	<b>42,424,186</b>	<b>87%</b>	<b>13%</b>	<b>36.9 million</b>	<b>5.5 million</b>

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<sup>18</sup> A small number of electors are classed as 'undecided' (rather than confirmed or unconfirmed) by EROs at the time of reporting. Some of these electors may subsequently be confirmed by additional data matching activities but for the purposes of reporting they are assumed to be unconfirmed. The number is too small to make any notable difference to the headline figures.

## Match rates by elector type

2.35 The electoral registers include flags to distinguish certain types of electors. For some of these types of electors, the available data allows for an analysis of their match rate.

### Postal and proxy voters

2.36 Following DWP and local data matching, 93% of **postal voters** could be confirmed and therefore the majority should retain their postal vote without needing to reapply (unless they move home subsequently).<sup>19 20</sup>

2.37 Proxy voters are those who appoint someone they trust to vote on their behalf. The numbers of proxy voters are relatively small with a total of approximately 20,000 in England and Wales.

2.38 The match rate, following DWP and local data matching for **proxy voters** was 86%.<sup>21</sup>

2.39 Electors with an existing postal or proxy vote can only retain their absent vote entitlement if they are registered individually (whether following CDR or LDM, or having made an application to register) by the time of publication of the revised register by 1 December 2014. Those with existing proxy votes will additionally only retain their proxy appointment if their proxy is also registered individually by that point.

2.40 Those not registered individually by the time the revised registers are published will automatically lose their absent vote entitlement, but they will remain on the register (as long as they remain entitled to be registered at that address) and will be able to vote in their allocated polling station at the May 2015 elections.

### Attainers

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<sup>19</sup> Some of these postal voters may be carried forward electors and would not therefore be automatically transferred onto the new IER registers. While it is not possible to disaggregate this group from the available data, the numbers falling into this category are likely to be very small.

<sup>20</sup> This analysis excludes six local authorities where the data contains notable anomalies – either a significant increase or decrease in the numbers of postal voters between the two points at which data was provided to Cabinet Office. These are Cornwall, Forest of Dean, Merthyr Tydfil, Neath Port Talbot, Tonbridge and Malling, and Watford. However, the national match rate is unlikely to be significantly affected by this. We are following up with those authorities to explore possible reasons for these increases or decreases.

<sup>21</sup> This analysis excludes eight local authorities where the data contains similar anomalies to those noted for postal voters. These are Allerdale, Broxtowe, Cornwall, East Dorset, Scarborough, Tonbridge and Malling and Wyre Forest. However, as with postal voters, the national match rate is unlikely to be significantly affected by this.

2.41 Attainers are those who are not yet old enough to vote but will turn 18 (i.e. attain voting age) within the twelve month period starting on the 1 December after they make their application. The match rate for attainers during the dry run of confirmation was 85% (this was solely matching with DWP data). The match rate with the DWP database in the live run is notably lower at 50% and it is not clear why there has been significant change. The matching rules which were used in the dry run and live run are largely the same and other results are consistent between the two processes. We will continue to work with Cabinet Office to explore possible reasons for this change.

2.42 The match rate after local data matching shows little improvement, reaching 52%.

2.43 Attainers present additional difficulties when interpreting the data as in many cases the absolute number of attainers reported by EROs changes significantly between the point at which the DWP matching was carried out and the point when local matching was conducted. There should be a change in the number of attainers on a rolling basis as some will turn 18 and become full electors on the register. Some EROs' results show substantial changes in numbers but it is not possible to identify errors in the data, as opposed to simply unusual results, with any certainty.

2.44 However, excluding results from those areas with large changes in absolute numbers appears to make little difference to the overall match rate in any case.

2.45 There is consequently a challenge for EROs to ensure that their engagement strategies are updated to reflect the activity they will carry out to maximise the number of attainers who are registered individually, and working with schools and colleges within their area is a key area of activity we will expect EROs to explore.

## Demographic analysis

2.46 As the electoral register does not contain demographic information and nor does the data passed onto to EROs from DWP, we conducted a linear correlation analysis between ward-level red match rates and demographic variables previously found to be related to the quality of the electoral

registers.<sup>22</sup> The objective of this was to see if there are any correlations between match rates and particular demographic variables.<sup>23</sup>

2.47 In our analysis of the results of the 2013 confirmation dry run, we found that areas with significant populations of particular groups were likely to have low match rates. These groups – also associated with low levels of electoral registration – are young people (aged 20-29), those renting from a private landlord and students. This correlation is likely to be because people in these groups were less likely to have an up to date record on the DWP database related to their current address – primarily because they change address, on average, more frequently than the general population.

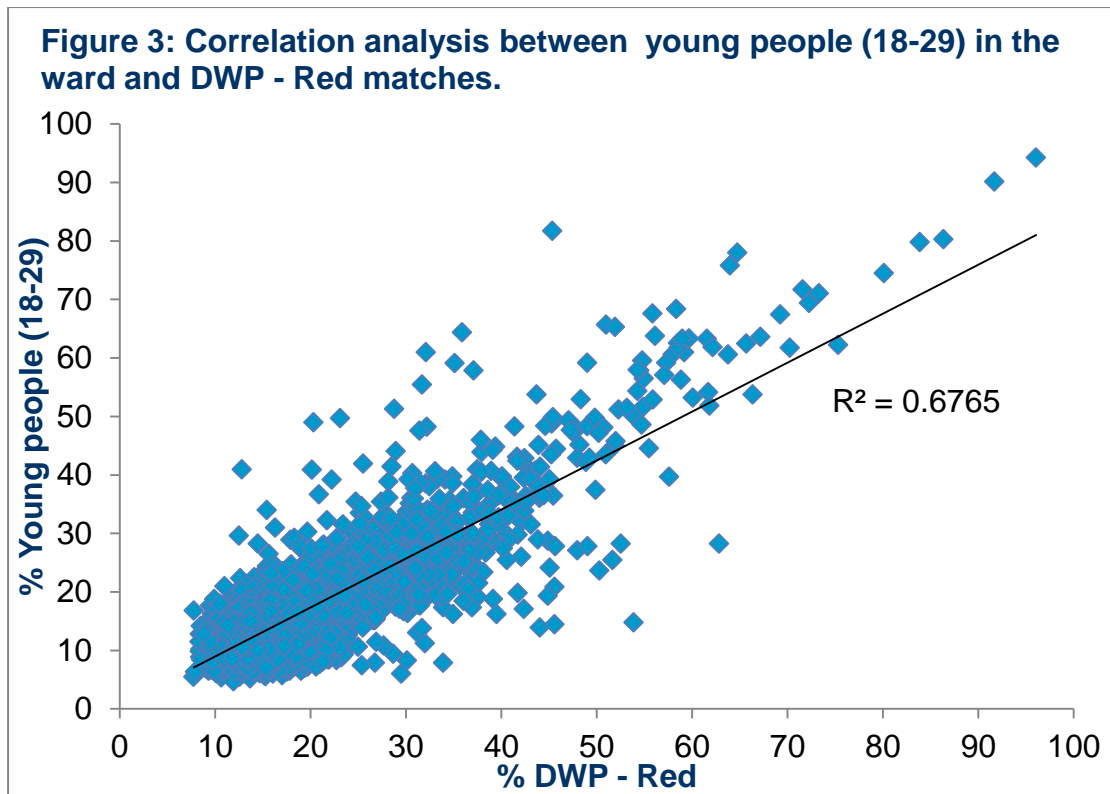
2.48 Analysis of the live run DWP match rates against demographic data indicates that these patterns remain: areas with higher concentration of private renters, young people, students and people not born in the UK had a lower match rate.

2.49 The chart below shows the correlation between DWP-red match rates and the percentage of people aged 18-29 in electoral wards across England and Wales. This variable returned the strongest positive correlation with DWP-red match rates: the higher the concentration of young people in the ward, the higher the DWP-red match rate.

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<sup>22</sup> All our research studies on the quality of the electoral registers in Great Britain found that certain characteristics have a strong impact on the register. These are age, tenure, mobility, and nationality/country of birth. All our research studies on the electoral registers are available on our website: <http://www.electoralcommission.org.uk/our-work/our-research/electoral-registration-research>

<sup>23</sup> The analysis has been conducted on all wards which provided confirmation results and could be matched to ONS 2011 codes. Demographic information refers to 2011 Census data.



2.50 The table below shows the  $r^2$  value – the correlation coefficient – between the selected demographic variables, DWP-red matches and the percentage of electors not confirmed after LDM stage (by electoral ward). The closer the  $r^2$  value is to 1, the stronger the correlation and vice versa.<sup>24</sup>

2.51 Only the proportion of private renters, young adults and student show reasonably strong or partial correlations with the DWP red match rate.

**Table 8: Correlation coefficient – Ward demographics, DWP-red match rates and percentage of electors confirmed.**

Demographic variables	DWP-Red matches	Not confirmed after LDM
Strong	Young adults, ages 18-29 ( $r^2 = 0.6765$ )	-
Partial	Students ( $r^2 = 0.6204$ ) Private renters	-

<sup>24</sup> This analysis broadly takes  $r^2 > 0.66$  as showing a strong correlation,  $0.5 < r^2 < 0.66$  a partial correlation and  $r^2 < 0.5$  no correlation.  $R^2$  values are a way of expressing how well one variable can predict another (in our analysis, how well demographic factors can predict match rates). With a set of different data points, it is possible to create a model (in this case a straight line) which attempts to be the best fit for all of the data points. The  $r^2$  value indicates how well the model fits the reality. An  $r^2$  of 1 indicates a perfect fit (change in one variable will entirely predict the change in the other) and an  $r^2$  of 0 that there is no fit (no relationship between the variables).

	( $r^2 = 0.5769$ )	
Weak or none	Country of birth (non-UK) ( $r^2 = 0.4323$ ) English not main language ( $r^2 = 0.3663$ ) Black and Ethnic Minorities ( $r^2 = 0.2488$ ) Communal establishments ( $r^2 = 0.124$ ) Social renters ( $r^2 = 0.0354$ ) Level of unemployment ( $r^2 = 0.0191$ ) People who speak Welsh ( $r^2 = 0.0093$ )	Young adults, ages 18-29 ( $r^2 = 0.4297$ ) Students ( $r^2 = 0.4565$ ) Private renters ( $r^2 = 0.3689$ ) Country of birth (non-UK) ( $r^2 = 0.2792$ ) English not main language ( $r^2 = 0.258$ ) Black and Ethnic Minorities ( $r^2 = 0.194$ ) Communal establishments ( $r^2 = 0.1066$ ) Social renters ( $r^2 = 0.0243$ ) Level of unemployment ( $r^2 = 0.0149$ ) People who speak Welsh ( $r^2 = 0.1542$ )

2.52 As outlined in the previous section, local data matching increased the number of electors who could be confirmed onto the new IER registers. It has also reduced the correlation between red match rates and particular demographic variables. Chart 4, below, shows the correlation between the percentage of private renters and the number of electors confirmed after local data matching. When compared to the results using DWP match rates (set out in Chart 3 above) it is clear that the strength of the correlation (the  $r^2$  value) has decreased.

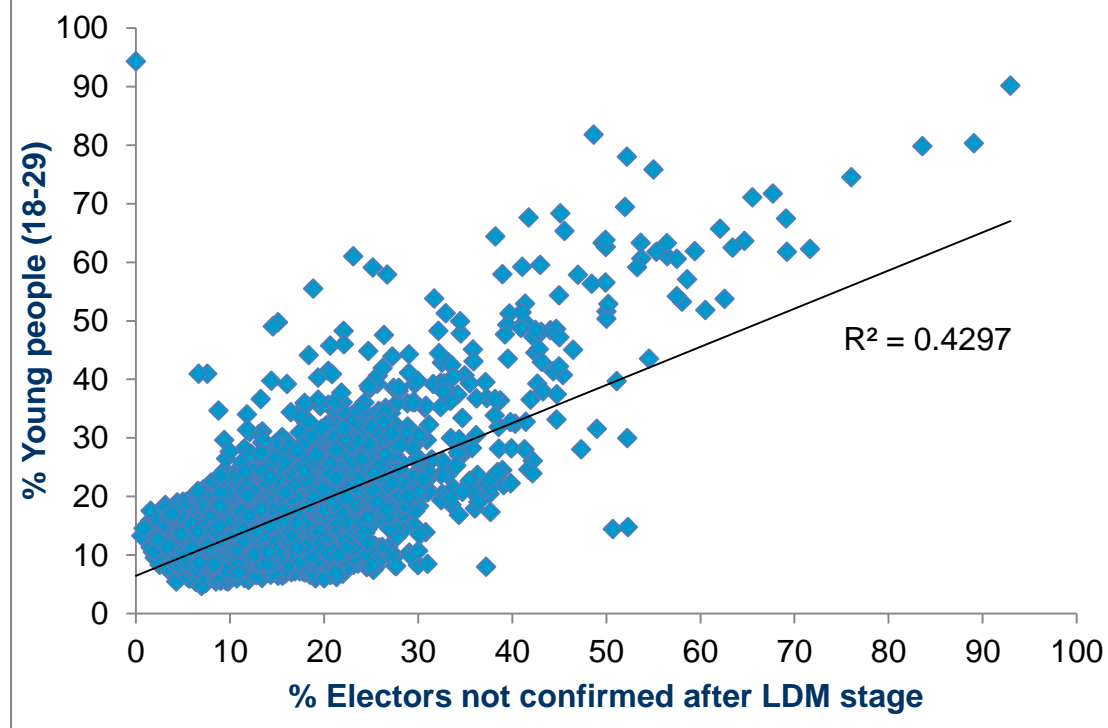
2.53 It is important to remember that this is a correlation analysis and there is no way to establish with certainty that the electors confirmed with local data are from these demographic groups. These results therefore suggest, but do not prove, that local data-matching may have helped to increase the number of electors from certain demographic groups automatically transferred to the new registers.

2.54 However, it is notable that the results presented in Table 8 show that the correlation coefficient decreases more significantly for those groups for which the local authority is more likely to hold information. For example, the analysis using the proportion of young people and privately rented households shows a weaker correlation with the results following local data matching.

2.55 This makes sense as privately rented households, for example, will still be liable for council tax which is, by far, the most commonly used local data

source. Conversely while the analysis does show a weaker correlation between the proportion of unconfirmed and of students following local data matching, the change is less significant than that observed for young people and private renters. Students are not liable for council tax and may also be less likely to appear on other local databases such as parking or housing benefit.

**Figure 4: Correlation analysis between young people (18-29) in the ward and electors not confirmed following local data matching stage.**



## Conclusions

2.56 The purpose of the confirmation process was to support the transition to IER by verifying the identity of existing electors directly with DWP, thereby removing the requirement for all existing electors to provide identifiers for registration. The analysis in this report shows that confirmation worked well – more than 36 million people have not been required to submit a separate application providing their personal identifiers in order to remain registered, allowing EROs to focus efforts and resources on inviting applications from the smaller proportion of electors who could not be confirmed as well as those not currently registered at all.

2.57 The experience of using confirmation during the transition to IER raises questions about whether there should be a role for confirmation as part of the electoral registration process in the longer-term, beyond this initial transition phase. If confirmation is an effective tool for maintaining the completeness of electoral registers, without compromising accuracy, there could be significant benefits: both for voters, who would not need to provide as much information in order to allow EROs to verify their identity; and also for EROs, who would



not need to commit resources to chasing people to provide those identifiers, and would instead be able to focus resources in other high priority areas.

2.58 We will work with the UK Government and EROs to further explore options for using confirmation to support the electoral registration process. We will assess the detailed practical implications of possible new processes, including as a priority considering whether it would be feasible to introduce any legislative and operational changes required in time to support the autumn 2015 household canvass programme. The focus of this work should be to identify whether it is possible to minimise the number of potential electors who are required to complete a separate application form providing their National Insurance number and date of birth in order to verify their identity and become registered to vote. Any new processes should not, however, risk reducing the level of identity verification required before a person's name is added to the electoral register for a particular address.

2.59 The experience of using data to verify the identity of potential electors without requiring them to provide additional information also highlights the potential for direct registration (using trusted government/public sector data to identify potential electors and then add them to the register without requiring them to complete an application form). The Australian Electoral Commission (AEC) has begun exploring the implications of direct registration,<sup>25</sup> and new laws passed by the Australian Parliament will allow the AEC to directly enrol electors or update their details on the electoral register based on information from other government agencies. The AEC will write to the elector and inform them that it intends to add their name and address to the electoral register or update their details. Electors do not need to reply to the letter if the details are correct, but they have 28 days to inform the AEC if the details are incorrect. We will work with the UK Government and EROs to further explore the feasibility and implications of using a direct registration approach for electoral registration in the UK.

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<sup>25</sup> Australian Electoral Commission *Direct Enrolment and Direct Update The Australian Experience* (2012) [http://www.aec.gov.au/about\\_aec/research/files/direct.pdf](http://www.aec.gov.au/about_aec/research/files/direct.pdf)

# 3 Progress with implementing the transition to IER in England and Wales

## Online registration

3.1 As part of the change to IER in Great Britain, a new system of online registration has been introduced allowing people to apply to register to vote online for the first time. Online registration brings greater opportunities to engage individuals in the democratic process and to boost the levels of registration among under-registered groups. The Cabinet Office was responsible for the development and implementation of the online registration service.

3.2 Online registration was launched on 10 June in England and Wales and on 19 September in Scotland and has worked well since go-live with no significant technical issues. The take-up of online registration has been positive: the Cabinet Office has reported that 1.8 million people have so far<sup>26</sup> used the online service.<sup>27</sup> User satisfaction with the online service is high, averaging xx%.

3.3 Of all new applications to register to vote under IER made since 10 June in England and Wales (and since 19 September in Scotland), approximately two thirds have been made via the online system, broken down by device as follows:

- PC – 67%
- Tablet – 18%
- Mobile – 15%

3.4 Use of the online registration service has been highest among the 25-34 age group, and lowest among the over-75s.

3.5 Electors who are working outside the UK as a Crown Servant or as an employee of the British Council are not currently able to complete and submit a registration application using the online registration service as the legislation still requires that the declaration part of the application must be sent to the

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<sup>26</sup> As at 16 October 2014.

<sup>27</sup> This reflects the number of people who have submitted an application to register online, but these are not necessarily unique new applications to register. This figure will include applications made by people who have used this process to notify the ERO about changes to their details; to change their choice about whether or not they want to be included on the open register; and duplicate applications.

ERO by the applicant's department (rather than by the applicant themselves). The UK Government has now published draft secondary legislation which would address this discrepancy and allow Crown Servants or British Council employees to complete the application and declaration using the online service, and to transmit the application directly to the ERO. The new online system is already a significant, positive development for overseas voters who can now use it to register and do not therefore need to post forms back to the UK.

## The write-out

### Process

3.6 The write-out – when EROs send confirmation letters to those electors who have been confirmed and so automatically transferred onto the new IER register, and invitations to register to those who have not - began on 3 July 2014 in England and Wales and will run until 30 November, prior to the revised registers being published by 1 December. The precise start date of the write-out varied between local authority areas as a result of factors including the timing of their matching against the DWP database, whether they were carrying out local data matching and the time this took, and practical factors such as IT systems and arrangements for printing and delivering letters and forms.

3.7 The confirmation letter - which is sent to those electors who have been automatically registered on the new IER register - tells the elector that they have been re-registered and do not need to take any action. It also tells the elector whether or not, based on their existing choice, their details are included on the open register (previously known as the 'edited' register) which is the version of the register that can be bought.

3.8 The invitation to register – which is sent to those existing electors who have not been confirmed, as well as to any new potential electors who have been identified – tells the recipient that that the way we all register to vote is changing, reflecting the key message of the public awareness campaign, and that they need to provide some more information in order to be included on the new IER registers. It explains how to register, and although it promotes the new online registration service [www.gov.uk/register-to-vote](http://www.gov.uk/register-to-vote), a paper application form must also be sent with each invitation to register for those who cannot or do not wish to register online.

3.9 The Electoral Commission designed a number of template forms and letters for Electoral Registration Officers (EROs) to use under IER. Some of these – including the invitation to register and registration application form - EROs are required by law to use and, in those cases, the designs were

approved by the Lord President of the Council.<sup>28</sup> Others we have strongly recommended that EROs use – this includes the template confirmation letter.

## IT issues

3.10 The transition to IER has been supported by some key IT systems – to match existing electoral registers against the DWP database in the initial ‘confirmation’ exercise; to check the personal identifiers on new applications to join the IER register against the DWP database in the on-going ‘verification’ process; and to allow people, for the first time, to apply online to join the register.

3.11 Each ERO has their own electoral management software (EMS) system that they use to manage and maintain their electoral register.<sup>29</sup> While each ERO is responsible for managing their EMS system and for the relationship with their EMS supplier, the Cabinet Office contracted directly with the four EMS suppliers for the changes that were needed to the EMS systems to reflect the change to IER.

3.12 In our March report on readiness for the transition to IER we reported that the development of the EMS systems, which was an important stream of work in developing the IT for IER, had proceeded largely to the intended timescale. While at that point there remained some work to be completed on development and testing, this was on track. We noted that the roll-out of the updated EMS systems needed to be managed carefully, however, in order to limit the risk to the successful delivery of both the May 2014 polls and IER.

3.13 There have been some issues with the functionality of the systems. These issues differ between EMS systems and have affected some – but not all – authorities, and in varying ways. This in itself is not entirely unexpected - the widespread roll-out of any new IT systems being operated locally by hundreds of individuals with a range of expertise and experience will in most instances result in some problems – and, fundamentally, we do not believe that any of these issues have or will cause long term problems for the successful delivery of IER.

3.14 Through our on-going monitoring and engagement with EROs and their teams, and our close working with the Cabinet Office’s Regional Delivery Managers (RDMs), we have identified the following specific issues with IT systems which have impacted on the implementation plans of some EROs.

- **Issues affecting the export of registration data from the EMS system following confirmation to enable letters and forms to be printed for the write-out**

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<sup>28</sup> According to the process set out in the legislation.

<sup>29</sup> In England and Wales, all EROs use systems provided by external suppliers. In Scotland, a small number of EROs use in-house software systems.

Many EROs and their teams reported difficulties with the process of exporting data from their EMS systems following confirmation. This data was required to populate confirmation letters and invitations to register and application forms, as well as household enquiry forms (HEFs).

Although all EROs have now been able to send their confirmation letters, invitations to register and household enquiry forms (HEFs), in many cases there were delays to the start of write-out activity as a consequence of the software issues.

The effect of these issues has been that many EROs have had to revise their write-out plans to take account of the reduced amount of time available for sending out reminders and carrying out personal visits before publication of the revised registers by 1 December 2014. For some EROs whose write-outs were delayed, this meant that their write-out took place towards the end of the Commission's national public awareness campaign or in some cases, after the campaign had finished which may have reduced the impact of the campaign in those areas, as well as the impact of their own local public engagement work.

- **Issues with EMS functionality for managing the write-out and the day-to-day processes involved in maintaining the electoral registers**

Many EROs have also reported issues with the functionality of their EMS systems. These have included problems with running reports to extract management information, for example to identify those electors or households who have responded to the write-out and therefore need to be sent reminders or receive a personal visit. There have also been some reports of technical difficulties with processing registration applications; and in some instances, issues with the software have led to delays in publication of the monthly updates to the electoral registers.

- **Issues relating to familiarity with and training in the use of the new systems**

We reported in March the growing concern among the electoral administration community around how much time they would have to familiarise themselves with the new EMS systems before 10 June, particularly in light of the elections on 22 May 2014. We welcomed the fact that training on these new systems would continue to be available to EROs and their staff after the May 2014 elections. Many electoral administrators are, however, reporting difficulties with understanding how the EMS systems work and how to carry out both new and routine processes on the new systems.

- **Welsh language issues**

In Wales, public bodies are required by law to treat the Welsh language

equally with the English language. In practice this means that all electoral registration documentation is produced in both English and Welsh. EROs in Wales have experienced problems implementing IER because software suppliers had not given sufficient attention to the need for bilingual operations in Wales or properly set up EMS systems to be able to issue forms or letters bilingually. Where the Commission had made template forms and letters available, these were all made available in both English and Welsh and were accessible to EMS suppliers, but had not been incorporated into the EMS system, and in some cases EROs were being asked by their suppliers to provide translations of forms and letters in Welsh. Supplementing the efforts of EROs and their staff to resolve this issue with their software suppliers, we have worked closely with the Cabinet Office Delivery Manager for Wales to identify solutions to these issues. Nevertheless many local authorities had to seek alternative workarounds outside of their EMS systems in order to be able to commence the write-out. In some cases, these issues resulted in delays to their local write-out timetables.

3.15 While we do not anticipate the issues seen so far causing long term structural problems to the new registration system, when combined with general unfamiliarity with the system, they are in some areas slowing down the write-out and canvass processes. However, on the whole, the write-out is now progressing well.

3.16 In considering the impact of the delays to the start of the write-out, it is important to keep in mind the 87% of the electorate who have already been confirmed and so need to take no further action on receipt of their confirmation letter.

3.17 There is, however, more work to be done and we anticipate that in some areas the processes for following-up with electors or households who have not responded to the write-out and canvass, which were initially planned to have been completed before the publication of the revised register by 1 December, will need to continue past that date. While the 1 December publication of the revised registers is a significant milestone, the process of maintaining accurate and complete electoral registers continues throughout the year and EROs will, in any case, need to continue to engage with individuals in their area to maximise registration, particularly in advance of the scheduled elections in May 2015.

3.18 We are continuing to work with EROs to support them in revising their plans where necessary and to confirm what arrangements they are putting in place to ensure that all necessary actions are completed and their registers are as accurate and complete as possible by the time of the May 2015 polls.

3.19 The Cabinet Office are liaising closely with the suppliers of the EMS systems in England and Wales whose users are experiencing problems to ensure that progress is being made to address issues. This work includes:

- carrying out training needs surveys and analysis to identify gaps in training and capability and working with the suppliers to provide additional training, support or guidance materials as necessary
- working with the EMS suppliers to ensure that they publish 'roadmaps' setting out what further software upgrades can be expected and the timetable for these updates

3.20 We will continue to monitor progress with resolving those software issues that are still outstanding, and will provide an update in our next report in February 2015. If at any time before that point we believe that the software issues are such that there is a fundamental risk to the effective delivery of electoral registration services, we will say so. We expect the Cabinet Office to continue to take steps to ensure that the EMS systems are fully functional and that electoral administrators are sufficiently trained to be able to manage and maintain their electoral registers confidently and accurately.

## Confirmation letters and the open register

3.21 As set out above, Electoral Registration Officers (EROs) sent confirmation letters to electors who have been automatically transferred to the new IER registers.

3.22 By law, the confirmation letter must tell the elector:

- That they have been automatically re-registered and do not need to apply to register under IER
- What the open register (previously known as the edited register) is, using statutory wording<sup>30</sup>
- Whether or not they are on the open register<sup>31</sup>
- How they can be added to or removed from the open register

3.23 The Electoral Commission has designed a number of template forms and letters for Electoral Registration Officers (EROs) to use under IER. Some of these EROs are required by law to use and in those cases, the designs were approved by the Lord President of the Council.<sup>32</sup> Others we have strongly recommended that EROs use – this includes the template confirmation letter.

### The open register

3.24 Since 2002 electors have had to make a choice about whether to opt out of the open register (previously referred to as the edited register). The

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<sup>30</sup> This wording is prescribed in legislation that came into effect on 10 June 2014 in England and Wales and 19 September 2014 in Scotland.

<sup>31</sup> The law places strict controls on who is entitled to a copy of the electoral register and what it can be used for. There are no controls on who can buy the open register or what it can be used for.

<sup>32</sup> According to the process set out in the relevant IER legislation.

open register is an extract of the electoral register, but is not used for elections. It can be bought by any person, company or organisation.

3.25 Under the previous registration system, all households were sent a canvass form every year listing everyone who was registered. Each person on the form had to make their choice every year and tick a box on the form if they wanted to opt out of the edited register.

3.26 With the introduction of IER, any elector who was confirmed retained their existing status: anyone who was previously opted out of the edited register will continue to be opted-out, and their details not included on the open register; and anyone who was previously on the edited register will continue to be included on the open register.

3.27 The law now also provides that an elector's open register choice will continue until they tell their ERO that they want to change it, rather than it having to be made annually.<sup>33</sup>

3.28 As part of the legislative changes, new wording was prescribed to describe the electoral register and the open register. EROs are required by law to use this wording when writing to people about their registration, including on confirmation letters.

3.29 Part of the purpose of the confirmation letter was to notify the recipient about whether or not they were on the open register and explain how they could change this if they wished. Once EROs began sending confirmation letters it became clear from the response that many people who were on the open register were not aware of that fact, and were unhappy about how their information was being used. EROs reported unanticipated high volumes of responses from people wanting to opt out of the open register which, in some cases, took an unexpected amount of time resource to deal with.

3.30 EROs also reported that some confirmed electors who are **not** on the open register had been confused about whether they need to do something to be removed from it. For people not on the open register, the wording of the confirmation letter can appear contradictory. It says:

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<sup>33</sup> Unless the elector has a change of circumstances that requires a new application, such as a change of address in which case they would have to make a fresh registration application and open register choice.



'Your details are not on the open register. To be added to the open register, please contact...' (recommended text)

Followed by:

'Your name and address will be included in the open register unless you ask for them to be removed.' (part of the statutory wording which must be included).

3.31 Both of these pieces of information are required to be in the letter. We recognise, however, that the ordering of the information in the letter may have contributed to the confusion experienced by some people, which we regret.

3.32 The part of the letter that explains what the registers are uses wording that registration officers have to use, by law. That was tested by the Government. We wrote and tested the other parts of the letter. However, the need to include the prescribed text in the confirmation letter was not identified until after testing. It has become clear that the way the information is presented on the letter is causing confusion for some people.

3.33 Once we became aware that the letter was causing confusion we gave advice to EROs about how they could change the letter to make it clearer, if they hadn't already printed their letters.

3.34 The write-out is a one-off exercise and so the letter won't be used again in England and Wales. However, we worked with EROs in Scotland to revise the template letter before the write-out began earlier this month. While the letter must still contain the required content, and use the prescribed wording, the template was amended to make it clearer that if you had already chosen to opt out of the edited register, you were not on the open register and did not need to do anything to be removed from it.

3.35 We will continue to keep the effectiveness of our template forms and letter under review as the transition progresses.

## Public engagement activity

3.36 Alongside their write-out EROs have been carrying out local public engagement activity aimed at those electors who need to take action in order to register or to remain registered, to encourage them to respond to their letter.

3.37 As set out in **Chapter 2**, our analysis of the CLR data showed that, with the exception of attainers, the results closely reflected the results of the CDR, on which EROs' IER engagement strategies and implementation plans were based. There was therefore no significant change in the challenges that each ERO was expecting to meet in their local area in terms of numbers of unconfirmed electors or the groups of unconfirmed or unregistered electors that they would most need to target during the transition to IER. With attainers, however, the reduction in match rates from the CDR means there is

a challenge for all EROs to ensure that their engagement strategies are updated to reflect the activity they will carry out to maximise the number of attainers who are registered individually, and working with schools and colleges within their area is a key area of activity we will expect EROs to explore.

3.38 We have continued to engage with EROs and their staff during this period to monitor the progress of their plans and to provide advice and guidance on the write-out process. We have targeted our support at EROs in areas where the scope and scale of the challenge of implementing IER is the greatest, including those with relatively large numbers of unconfirmed electors.

3.39 In addition, the Cabinet Office's Regional Delivery Managers (RDMs) are monitoring implementation in their areas to identify and deal with any barriers to successful implementation, including supporting EROs in resolving technical issues that arise during the transition.

## About the Commission's campaign

3.40 The Commission's advertising campaign was designed to complement EROs' local public engagement activity by raising awareness of IER, and was therefore timed to coincide with the start of the write-out, based on the CLR schedule, when most people would be receiving their letters. It launched in England and Wales on 3 July and ran until 10 August.<sup>34</sup>

3.41 The overarching objective of the campaign was to encourage people to 'look out for your letter' that would tell them whether they needed to take action.

3.42 The campaign ran across TV, websites, search engines, and outdoor advertising, as these were the communication channels that we had identified as most effective for reaching those individuals the confirmation dry-run results and other data identified as least likely to be confirmed.

3.43 The outdoor advertising was live from 14 July to 10 August, slightly later than the other advertising because its purpose was to act as a prompt to those who had already received their letters. It ran in areas which were more likely to have lower match rates, as indicated by the confirmation dry run data, and we shared the advertising locations with EROs so that they could take them into account in their own plans.

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<sup>34</sup> The Commission's campaign in Scotland will run from 16 October to 13 November.

## Evaluation of the Commission's campaign

3.44 We have undertaken tracking research to evaluate the effectiveness of the campaign in England and Wales and the results are summarised below.<sup>35</sup>

### Research approach

3.45 Before our campaign started on 3 July, we completed 1919 face-to-face interviews with people who are eligible to register to vote (i.e. people who met the age and citizenship criteria). This included 1719 interviews in England and 200 in Wales. Respondents were asked a series of questions about the way we register to vote, to test their understanding of whether the system was changing and where (if anywhere) they had seen or heard information about the change.

3.46 Towards the end of our campaign, from 8-17 August, we completed 1915 face-to-face interviews, again with people who are eligible to register to vote. We did 1715 interviews in England and 200 in Wales. We asked respondents the same questions as the ones we asked in interviews before the campaign started, and we also asked specific questions to test their recognition of and responses to our campaign advertising.

### Research results

3.47 The research results show that we met three of our four key performance measures (KPMs) for the campaign as outlined below:

- 54% of respondents recognised any element of our campaign, which meets our KPM of between 50-60%
- 56% of respondents reported being aware of the change to the voter registration system, meeting our KPM of between 50-60%
- 72% of respondents stated it was true that they needed to look out for a letter about registering to vote from their local council, which exceeds our KPM of 40-50%
- 21% of respondents who recognised our campaign advertising claimed to have taken action as a result, including looking out for and reading a letter. We were aiming to achieve 25-35% for this KPM. One possible explanation for this result is that respondents may not have considered 'looking out for a letter' to be an action

3.48 Other findings show that:

- Before our campaign started, 11% of respondents claimed to have recently seen or heard anything about a change to the way people register to vote and towards the end of our campaign this increased to 48%

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<sup>35</sup> We will complete similar research to help assess the performance of our IER campaign in Scotland.

- 49% of respondents claimed to have received a letter from their local council telling them whether they needed to do anything
- Respondents were shown the 'your vote matters' logo and 48% claimed to have seen the logo before with 41% saying they'd seen it on a letter or an envelope

## 4 Looking ahead

### Conclusion of the write-out and canvass

4.1 EROs are required by law to take specified steps to follow-up where there is no response to a household enquiry form (HEF) or where they have invited a person to register to vote but no application has been made. The steps that must be taken include making at least one personal visit where there has been no response after three HEFs, and one personal visit to encourage a person to make an application where three invitations to register have been sent. There is, however, no specified order in which these steps must be taken.

4.2 EROs are now in the process of sending reminders and visiting non-responding individuals and households ahead of the publication of the revised register by 1 December 2014. As we identified earlier in this report, some EROs who have experienced difficulties in implementing IER according to their plans and whose write-out activity was delayed may not be able to complete all of their canvassing activities before the revised register is published and will need to continue this work after 1 December, placing an even greater emphasis on the work they will need to carry out in early 2015 to ensure that their registers are as accurate and complete as possible ahead of the May 2015 elections.

### House-to-house enquiries

4.3 In our last assessment of performance against the Commission's ERO performance standards for household registration, published in June 2014,<sup>36</sup> the Commission reported that 22 EROs did not meet standard 3: house-to-house enquiries in respect of the 2013 canvass.<sup>37</sup> This standard aimed to ensure that EROs made the necessary house-to-house enquiries to ensure that all eligible residents are registered. These 22 EROs did not ensure that all addresses that had not provided a response to the canvass form received a personal visit from a canvasser to identify whether electors were still resident and entitled to remain registered. The main reasons cited by EROs for failure to carry out house-to-house enquiries with all non-responding households were budget constraints; being unable to recruit enough canvassers; and the rurality of certain local authority areas.

4.4 As part of ERO performance monitoring we – along with the Cabinet Office's Regional Delivery Managers – have been working particularly closely with the 22 EROs who did not meet standard 3 in 2013 to ensure they have

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<sup>36</sup> [http://www.electoralcommission.org.uk/\\_data/assets/pdf\\_file/0005/168908/Analysis-of-electoral-registration-data-for-Great-Britain-2013.pdf](http://www.electoralcommission.org.uk/_data/assets/pdf_file/0005/168908/Analysis-of-electoral-registration-data-for-Great-Britain-2013.pdf)

<sup>37</sup> Performance standards for EROs (applicable from 2008-2013)  
[http://www.electoralcommission.org.uk/\\_data/assets/pdf\\_file/0007/57949/Performancestandards-2008-06-25\\_final-webres.pdf](http://www.electoralcommission.org.uk/_data/assets/pdf_file/0007/57949/Performancestandards-2008-06-25_final-webres.pdf)

arrangements in place to carry out house-to-house enquiries as required under IER. This has included a review of these EROs' implementation plans ahead of the start of the write-out which established that they do all have plans in place to carry out the necessary house-to-house enquiries under IER, and have identified and allocated the resources they will need to do this work. We are, however, continuing to engage closely with these EROs to monitor how they are putting their plans into practice so that we are able to intervene quickly if it appears that this may not be the case.

4.5 If we become aware that an ERO is not carrying out the necessary enquiries – whether in the course of our monitoring discussions throughout the write-out and canvass period or as a result of analysing data following publication of the revised register in December 2014 – we will consider all options available to us, which may include making a recommendation to the Secretary of State to make a direction. In the event we consider it necessary to make a recommendation, we would seek to act quickly, and would expect any direction to EROs to require them to carry out the necessary house-to-house enquiries as soon as is practicable and in any event before the May 2015 polls. We are working with Cabinet Office officials to put in place a process for escalating ERO performance issues and, where necessary, making a recommendation to the Secretary of State to exercise his power to issue a direction to one or more EROs.

## Publication of the revised registers

4.6 The publication of the revised register by 1 December 2014 in England and Wales is the next key milestone in the transition. It will mark the end of the write-out and 2014 canvass, during which EROs will have been targeting those electors who have not been confirmed, as well as working to identify potential new electors not already on the register.

4.7 It is important to state at the outset that though the Commission views the register published on December 1 in England and Wales as an important milestone in the progress of the transition to IER, it is in no way its conclusion. The progress that has been made by that point will confirm what work remains to be done in the build-up to the 2015 elections and should highlight any specific groups that need to be targeted. We will be working with EROs to support them in planning for and carrying out activity in their area to maximise registration rates between the publication of the revised register and the election registration deadline, and will support this at a national level with a public awareness campaign to encourage registration ahead of the elections.

## Assessment of the write out

4.8 The Commission's next report on IER transition will be published in February 2015 and will be based on the results of our ongoing monitoring of performance as well as detailed, local authority-level data collected from every ERO after the publication of the December registers in England and Wales (a separate assessment for Scotland will follow in April 2015 following the publication of the revised registers by 2 March 2015).

4.9 This data will allow us to assess how the transition has progressed from the end of the confirmation exercise up to the publication of the revised registers. Although it will not allow for a full assessment of the accuracy and completeness of the registers at this point, it will allow us to answer crucial questions about the progress of the transition including:

- How many / what proportion of electors would be removed at the end of transition should they continue to fail to be registered individually?
- How many electors are registered for an absent vote on 1 December 2014 (2 March 2015 in Scotland)?

4.10 Importantly, by collecting the data from every ERO in England, Scotland and Wales we will be able to see any significant variations across Great Britain. It will also allow both the Commission and EROs to identify areas where action needs to be taken.

4.11 We will also be able to assess the success of work undertaken by EROs to target specific groups we know are less likely to be confirmed - for example, what progress areas with significant numbers of students have made in encouraging them to register individually under IER, and what practices they have found to work well and which others could learn lessons from. At the current stage in the transition it is too early to be able to fully evaluate this activity. For example, work to encourage university students to register can only begin in earnest following the start of the university academic year in late September/early October. We will continue to work with EROs and their teams, and the Cabinet Office, to identify what has worked well and to see whether any of these activities have wider applicability after the write-out, for example for encouraging unregistered people to register to vote, while recognising the one-off nature of this stage of the transition.

## Registration activity in early 2015

4.12 Although the publication of the revised register by 1 December in England and Wales will be an important milestone in the progress of the transition to IER, it is by no means the end of the process of implementing IER. As set out above, these registers will give a very good indication of outcome of the first stages of the transition as well as the work that remains to be done to register unconfirmed electors and those who are not registered at all.

4.13 EROs will need to evaluate their public engagement strategies following the publication of the revised register by 1 December 2014 to understand what challenges remain locally. They will need to update their strategies to reflect the updated information about which groups of electors they need to continue to target in their areas and the evidence about the effectiveness of particular engagement activities. This information should be used as part of EROs' ongoing work to target electors who are not registered individually ahead of the scheduled polls in 2015, including electors who have lost their absent vote entitlement, to maximise the number of electors being

able to vote using their preferred method of voting at the scheduled polls in May 2015.

4.14 We are currently in discussions with the Cabinet Office about potential for additional funding being provided to EROs to support them with their work to maximise registration between the publication of the revised registers and the May 2015 polls. We are also looking at whether and how we could reflect this activity in the public awareness campaign that we will be carrying out in the run-up to the UK Parliamentary general election in 2015, which will focus on encouraging people to register to vote ahead of the registration deadline.

4.15 We are determined to do everything we can over the coming months to maximise registration and we believe that the UK Parliamentary election next year will provide a great rallying point for us, and others working in this area, to ensure that as many people are registered as can be. As anticipated, online registration looks as though it will be a crucial tool in helping to deliver this.

4.16 As part of the move to IER, the Commission has also been building partnerships with a range of organisations to help reach its target audiences. This includes working with the National Union of Students to feature voter registration content on its website and to produce a toolkit of resources for student unions across Great Britain to use, to help students register to vote. It also includes working with housing associations to communicate voter registration messages through their newsletters, website and social media channels, to reach people who are renting or moving house. We will continue working in partnership with other organisations through to the May 2015 elections and beyond, with the aim of ensuring as many people as possible register to vote. Information on the Commission's approach to partnership working and a list of current partners is [available on its website](#).

### **Assessment of registration activity ahead of the May 2015 elections**

4.17 In June 2015, we will report on our assessment of the effectiveness of the transition up to that point, with a view to informing the Ministerial decision, which will need to be taken very soon after the UK Parliamentary General Election in May 2015, on whether to bring the end point for IER transition forward from the current date in December 2016 to December 2015. Our assessment will be underpinned by a clear understanding of what the effect on the registers would be of ending the transition in December 2015 and therefore removing those electors not yet registered individually at that point.

4.18 In order to ensure our assessment is as up-to-date as possible we will again collect local authority-level data from all EROs immediately after the last date for registering ahead of the May 2015 elections. This data will be similar to that collected in December 2014 (March 2015 in Scotland).

4.19 The range of polls scheduled for 2016 means that everywhere in Great Britain will have elections on 5 May 2016 and we would want to be satisfied that particular areas are not going to have significantly worse levels of registration than others before making any recommendation on bringing forward the end point of the transition.



## Measuring accuracy and completeness

4.20 In addition to the rolling programme of data collection, the Commission has also included two studies into the accuracy and completeness of the electoral registers as part of our monitoring work around the transition to IER.

4.21 The result of the first of these studies was published in July 2014 and provides a baseline against which we can assess the impact of IER. This study found that the last registers to be compiled under household registration – those published in February and March 2014 – were 85% complete and 86% accurate. This represented a stabilisation in levels of completeness from the last point at which comparable registers were assessed (those published in December 2010).

4.22 The second study will take place once the transition to IER is complete using either the December 2015 or December 2016 registers, depending on when the transition ends. This will provide estimates on the accuracy and completeness of the first full IER registers, and will be published in either July 2016 or July 2017.

# Appendix 1

The following 19 EROs had not carried out local data matching at the time of reporting data to Cabinet Office. Some of these EROs have plans to use local data matching later in the transition process. Further details are set out below.

## **Amber Valley Borough Council**

In developing their plans for delivering the transition to IER, the ERO concluded that the authority did not have the necessary hardware or staffing resources to carry out a full local data matching exercise. The plans they put in place to target unconfirmed electors were based on the results of the confirmation dry run, which provided an accurate reflection of the challenges facing them in practice, with the results of the confirmation live run only varying by 0.7% with no significant ward level variations.

## **Barnsley City Council**

Barnsley had planned to carry out local data matching but as a consequence of two local by-elections and a PCC by-election arising during the period that had been allocated for this work, the ERO determined that they did not have sufficient time or resources to carry it out before the commencement of their write-out activity. However, as a result of the PCC by-election, the ERO has exercised their right to delay publication of their register until 2015 and will therefore extend canvassing activity into this period and ensure further follow up work can be done with unconfirmed electors. They have also indicated that they will use local data matching as part of verification during this process.

## **Bolton Council**

Bolton had planned to carry out local data matching but, as a consequence of a number of software-related issues, the ERO determined that they did not have sufficient confidence in the robustness of the data to proceed. Their decision was also influenced by the fact the local data matching exercise they had carried out as part of the CDR exercise had produced lower than expected match rates. All electors not confirmed through the CLR process have now been sent an invitation to register as part of the write-out process. The ERO has confirmed that they now also plan to do further canvassing activity in early 2015 to mitigate the risks of having a higher number of electors not registered individually which could arise from not doing local data matching.

## **Brent Council**

Brent did not carry out local data matching because compatible systems to carry out that activity were not available prior to the write-out. At the beginning of 2014, the council tax database they would have used to carry out the majority of the exercise did not hold the Unique Property Reference Numbers (UPRNs) that would enable data to be matched. Although the electoral services team worked with others to get this rectified, the UPRNs were only imported in June 2014, which the ERO determined was too late to enable

local data matching to be carried out without impacting on the original planned timetable and causing a delay to the write-out.

In previous years the household visit stage of the canvass has been crucial to the overall outcome in Brent and their plans for IER implementation were based on this experience. Historically, the response rate to canvass forms prior to the household visit stage has not exceeded 50% but, following personal visits, has risen to around 95% by the time the revised register is published. Brent commenced personal canvassing activities in early October as planned.

### **Broadland District Council**

Broadland reported that they reached their decision not to carry out local data matching based on time constraints, staffing issues and software issues. The ERO determined that, on the basis of their CDR results, there would be questionable benefits in undertaking local data matching given the time and staff resources at its disposal following CLR and prior to commencing the write-out. Discussions have since taken place between the electoral services team and colleagues in council tax, housing benefit, planning and environmental health records. The ERO has reported that they are beginning to complement their initiatives to maximise registration with local data matching for verification purposes and will continue this going forward, focussing on engagement with younger and older people.

### **Erewash Borough Council**

Erewash reported that while they do not have the necessary hardware to enable them to carry out a full scale data matching exercise, they have been manually matching electors against council tax records. As they were aware in advance that they did not have the capability to carry out a full local data matching exercise with all unconfirmed electors, their plans to target unconfirmed electors were based on the results of the confirmation dry run, which provided an accurate reflection of the challenges facing them in practice, with the results of the confirmation live run varying by less than 1%, and there being no significant variations at ward level.

### **Hackney Council**

Hackney's initial implementation plans included time for local data matching with data sources from other council departments but delays relating to the preparation of the software system left them no time in practice to undertake local data matching ahead of their print deadlines for the write-out. Their EMS system had no in-built data-matching functionality and they had to purchase external compatible software which involved a complex procurement process. The system is now in place and Hackney intend to carry out local data matching before issuing reminders to any non-responding unconfirmed electors in order to reduce the amount of follow-up activity required and maximise the number of existing electors who can be automatically transferred onto the new IER registers. Personal canvassing will commence in mid-October.

### **Hertsmere Borough Council**

As a result of software issues, Hertsmere concluded that they would not carry out any local data matching. Their main data source was found to be incompatible with their data matching tool, and attempts by their supplier to resolve this throughout the year up to the CLR were ultimately unsuccessful. The ERO therefore took the decision to proceed with the write-out without local data matching so as not to risk delaying the timing of the write-out and to ensure it could be timed to coincide with a local advertising campaign specifically targeting their lower matching areas.

### **Horsham District Council**

Horsham had a CLR match rate of 84% and concluded that this figure would not be improved sufficiently to justify the financial outlay required to carry out local data matching. In addition, the scheduling of their CLR in mid-July meant that they felt they did not have sufficient time to conclude local data matching before commencing their write-out and still able to coincide their activity with the Commission's public awareness campaign. Horsham have, however, put in place arrangements to use local data matching to support the verification of the identity of new applicants.

### **Mid Sussex District Council**

Mid Sussex had initially planned to do local data matching but, as a result of software issues resulting in processes either not being able to be implemented or taking much longer than anticipated, the ERO decided not to proceed with the exercise. They are now carrying out local data matching for verification purposes.

### **Plymouth City Council**

Plymouth reached the decision not to carry out local data matching further to tests undertaken during the CDR, determining that the process did not yield sufficient improvement in their match rate to justify carrying out the exercise this year. The ERO concluded that it would be more beneficial to immediately commence write out activities and gain extra time for follow up activity with non-responders.

### **Reading Borough Council**

Based on their understanding of the challenges in their area, Reading took the decision during their planning for IER not to carry out LDM immediately following CLR but instead to do so prior to commencement of their personal canvassing activities in order to ensure these can be targeted as effectively as possible.

### **Redbridge Council**

Redbridge reached the decision not to carry out local data matching on the basis that it would have risked delaying their printing which in turn risked a delay to the start of their write-out. The ERO determined that the priority for their authority was to ensure that their write-out coincided with the Commission's public awareness campaign. Redbridge have plans in place to reach all unconfirmed electors who do not respond to the initial write-out through house-to-house enquiries.

### **Royal Borough of Windsor & Maidenhead Council**

Windsor and Maidenhead had planned to carry out an automated local data matching exercise following their CLR, but issues with the compatibility of their data sources coupled with problems with their software system meant that this was not possible in practice. In the absence of a solution to the data compatibility issues, they are now planning to implement a manual system of checking unconfirmed electors against council records for verification purposes, once the system and data compatibility issues are resolved.

### **Ryedale District Council**

Ryedale took the decision to carry out local data matching on conclusion of their write-out as they have historically had high response rates to their canvass. This also ensured that they could commence their write-out in time to coincide with the Commission's public awareness campaign. The ERO determined that it would be more effective for them to use local data matching to target the smaller number of electors who did not respond to the write-out rather than for all unconfirmed electors.

### **Sevenoaks District Council**

Taking into account their CDR result where 81.3% of their electors were green matched, Sevenoaks took the decision at an early stage in their planning not to carry out local data matching as they took the view that the outcome would not be of sufficient benefit to warrant it. Their plans to target unconfirmed electors were based on the results of the confirmation dry run, which provided an accurate reflection of the challenges facing them in practice, with the results of the confirmation live run were within 0.7% of their CDR results, with no significant ward level variations.

### **Stafford Borough Council**

Stafford's planning was based on the fact that they had carried out an extensive data matching exercise with local data sources prior to the CLR, targeting the areas highlighted by the CDR results and identified through previous experience as posing a particular challenge. The ERO reached the decision that, following this work, the results of the CLR would not benefit sufficiently from further local data matching activity to justify carrying it out.

### **Sutton Council**

The ERO reported that due to transitional delays in their write-out they were unable to carry out LDM before their planned write-out date. LDM is, however, now being undertaken. Their implementation planning focused on their personal canvass and they have made the necessary adaptations to their plans for this to ensure they can reach all their unconfirmed electors.

### **Wakefield Council**

Wakefield reported that having been aware they would be working to a compressed timetable following CLR to complete LDM before the Commission's national public awareness campaign finished, and therefore prepared for the eventuality that it would not be possible, they had carried out extensive work towards improving the accuracy of their register before the CLR, including undertaking a significant number of reviews of register entries

following publication of the revised register in February. This was in addition to the local data matching exercise they carried out following CDR. As anticipated, their scheduled CLR upload date in July did significantly impact on the availability of time for undertaking LDM prior to the planned write-out in August. Wakefield now plan to undertake on-going LDM on a case-by-case basis for verification purposes following the initial write-out stage.