

ELECTIONS COMMITTEE		
Report Title	Individual Elector Registration (IER)	
Key Decision	n/a	Item No.
Ward	n/a	
Contributors	Head of Law (Malcolm Constable, Kath Nicholson)	
Class	Part 1	Date: March 10 2014

1. Purpose

The purpose of this report is to update the Elections Committee with developments relating to IER.

2. Recommendation

That the Committee note this report.

3. Background

The Head of Law and the Electoral Services Manager prepared a briefing note for elected representatives in September 2013 following considerable activity relating to Individual Electoral Registration (IER). The briefing note is attached as Appendix A. Since that time there have been additional developments which are detailed below.

4. Funding

- 4.1 In November 2013 we were notified of the funding the government was going to make available for the transition period - 1 April 2014 to December 2015. The London Borough of Lewisham (LBL) will receive approximately £179,000 which we believe is adequate. The funding formula used was based on various algorithms associated with our Confirmation Dry Run (CDR) results including factors such as electorate churn, the number of 16 year olds and transient student population.
- 4.2 No commitment has been forthcoming about funding post the transitional period. Funding will not be ring fenced. It will be paid as part of the Rate Support Grant, but Local Authorities will have to account separately for how it is spent.
- 4.3 We have recently been advised that we will receive an additional £27,000 to be spent on local outreach initiatives during the transition period. We are in the process of developing an engagement plan particularly for those groups that we have identified as being most at risk of not being registered or not matched under IER pass-porting arrangements. These groups are students, elderly residents in care homes and 16 and 17 year olds. Local initiatives will run alongside the Cabinet Office and Electoral Commission national campaigns which will commence shortly after the elections in May.

5. Staffing & training

- 5.1 The team went through a restructuring in November which resulted in an increase in staffing levels from 4.5 FTE to 6.5 FTE. This was in response to the anticipated increase in workload that the introduction of IER will bring with it, the late canvass and preparation for May 2014 elections. The team now consists of three Principal Electoral Services Officers one of whom is the project manager for IER. There are 2.5 Electoral Services Officers. The positions were filled at the beginning of January 2014.
- 5.2 The whole team will have to attend general training relating to IER and specific training relating to Electoral Management Software. The Project manager is the ALIERT - Authority Lead IER Trainer. Training has been booked for core elections team members but it is taking place ahead of the election period and we believe some refresh training will be required after the elections.
- 5.3 The IER project manager is also responsible for producing revised process manuals.

6. Confirmation Live Run date and other developments

- 6.1 The Cabinet Office told us that our Confirmation Live Run date will be 11 June 2014, shortly after the 22 May elections. We have about three weeks to examine the data and conduct local data matching before we have to mail out:
- 150,000 Confirmation of Registrations to pass-ported electors;
 - 30,000 Household Enquiry forms to non-responding and void properties identified during the late canvass; and
 - 42,000 Invitations to Register forms to non-matched electors who responded to the late canvass or who subsequently return a HEF.
- 6.2 We have recently been advised that HEF and ITR forms will be A3 size. Again the Cabinet office have indicated that they realise this will mean reinvestment in scanners. We will need two A3 scanners and associated software.
- 6.3 Our Confirmation dry run was based on GCSX connectivity and security. We have very recently become PSN compliant and have successfully retested connectivity.
- 6.4 The Cabinet Office monitors the “state of readiness” by EROs across the country by asking them to confirm, via their IER portal, progress against the detailed milestones in their plans. Our current overall assessment is that we are “likely” to meet the transition arrangements. Realistically we have to take note of the competing number of tasks that the Electoral Services Team faces ahead of the Confirmation Live run date, particularly preparation for a complex combination of elections. Again most London boroughs have indicated the same state.

7. The late canvass

- 7.1 As indicated above, the Cabinet Office delayed the start of the canvass from September 2014 to October 2014 with a revised register to be published by the 17 February 2014 rather than 1 December 2013. This is to ensure that the Register is as up to date as possible before the Confirmation Live Run takes place in June. There were significant reservations about the revised timing amongst EROs and electoral administrators who pointed out the difficulty of hiring canvassers over the winter months and splitting the canvass over the Christmas period.
- 7.2 Our overall canvass result was a return of 94% from all households versus 95% in the previous year ending 1 December 2012. The result was, we believe, quite creditable given the appalling weather the canvassers faced after the Christmas period. We also believe that results were impacted by the legal advice issued by the Electoral Commission, the Cabinet Office and advice we and other authorities sought about removing the pre-printed "opt-out" tick from canvass forms relating to the edited register whereby electors express their preference not to be included in the Edited Register. This followed the threat of legal action by 192.com.
- 7.3 Our telephone, internet and SMS text responses were marginally lower than the previous year. We believe we made our telephone and internet scripts as simple as possible, which gave responders, who would normally have confirmed their details as "no change", the option to re-confirm the opt-out. It was noticeable from the number of incomplete calls to our service provider that this option was not clearly understood. This was also confirmed by the number of telephone calls we received from electors who had confirmed their details as "no change" but could not remember if they had renewed the opt out. When checking we invariably found they had not renewed the opt out so we then asked them to submit the form with the opt out box ticked. Overall the number of people opted out of the Edited Register fell from 58% in November 2013 to 38% on publication of the Register on the 17 February 2014.
- 7.4 The new IER regulations will fix this anomaly with electors' preferences being carried over from year to year rather than them having to renew the preference.
- 7.5 Revised electorate figures for wards and parliamentary constituencies are given in appendix B. Also included at Appendix C is an electoral ratio analysis relating to ward boundaries that indicates that we do not meet any of the triggers that would result in a Ward boundary review by the Local government Boundary Commission for England.

8. Next Steps

There are still some key issues to note and some of which are still to be decided on

- The Cabinet Office have yet to make a decision about whether the HEF canvass should now be extended to all households this year rather than just those mentioned in 6 above.

- We have to decide on how and on what basis canvassers should be employed and what equipment they should have. For example there is a suggestion that canvassers should be given tablet devices so that electors can enter their details directly into the IER digital service (IERDS) untouched and unseen by the canvasser.
- Local communications plans need to be refined in the light of the additional funding being made available. We have already contacted the admissions team at Goldsmiths to ensure that we can register students on admission and include information about IER in their welcome packs. We have also been instrumental, along with Lambeth and Westminster, in applying for and winning funding on behalf of London Boroughs from the Cabinet Office under their Maximising Registration Campaign to encourage young people to register by developing a website under the “Change things now”. The website is deliberately targeted at young people.
<https://www.changethingsnow.co.uk/>
- Training has to be completed and should be rolled out to all customer facing groups in LBL as well as elected representatives.
- Process manuals have to be written.
- Should we place additional PCs in strategic locations so that potential registrants can go on line to IERDS?
- Will we enforce legal and civil penalties for the non-return of HEF and ITR forms respectively? The Cabinet office have indicated that if our Registration levels fall and we have not taken such action the ERO will not have fulfilled the “all necessary steps” criteria in the regulations.
- The law, as it currently stands, indicates that anybody not registered or pass-ported under IER provisions by 1 December 2016 will be removed from the register. However, there is provision for this date to be brought forward. The Cabinet Office have indicated that they wish to bring this date forward to 1 December 2015 after the Parliamentary election.
- Postal Voters will either have to have been pass-ported or registered by IER ahead of the 2015 Parliamentary elections. They will not be removed from the register and can still vote at the polling station.
- Whilst not a statutory requirement placed on the ERO we have calculated that Local Data Matching is a cost effective way of pass-ported electors. We need to review other databases, such as housing benefit, for integrity to see if they can be used effectively and with a degree of comfort to further match and passport electors.
- Rules relating to processing those electors who do not have sufficient ID to apply on line or who are mismatched need to be refined. We believe these are likely to place a considerable burden on the Electoral Service team.

9. Financial implications

See section 4 above.

10. Legal implications

These are set out in the body of the report.

11. Crime and disorder implications

The Government introduced IER with the expressed intention of combating electoral registration fraud.

12. Equalities implications

The Council has a duty under the Equality Act 2010. We will put in place, post the May elections, a strategy to encourage registration by those with protected characteristics and hard to reach groups using Cabinet funds yet to be received.

13. Environmental implications

There are no environmental implications arising.

14. Background documents and originator

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Individual Elector Registration (IER) - Briefing for MPs

1. Background

- a) The Electoral Registration and Administration Act (the Act), passed on 31 January 2013, fundamentally changes the electoral registration process. It requires the full introduction of IER by 1 December 2015, after the General Election in May 2015. The Act provides for individual electoral registration (rather than household registration as now) and for those people not automatically “passported” onto the new electoral roll to be required to produce their national insurance number (NINO) and date of birth (DOB) on registration.
- b) There are transitional arrangements. The Act provides for the deletion of electors from the electoral roll on 1st December 2015 if they have not:-
 - been “passported” in a matching process of the electoral register with DWP data, or
 - responded to the canvass which runs from October 2013 to February 2014, or
 - subsequently responded to IER requests to register .

2 Action to date

The Council has focussed its activity on the transition arrangements. This includes:-

- upgrading our Electoral Management System and supporting ICT to be fit for purpose and able to communicate securely with the IER Digital Service (IERDS)
- preparing data sharing protocols
- a dry run of the matching process in June this year. This entailed test matching electors on our register to the DWP database to give an indication of the likely outcome of the live matching process which is to be done in July 2014.
- analysing the results of the dry run to enable us to target relevant areas and types of non-matching electors during this year’s canvass.
- a local data matching exercise, after the dry run, matching those not matched with DWP data with Council Tax records. Note that local data matching is not a statutory requirement; it is a voluntary activity by the ERO.

3. Confirmation Dry Run

- a) LBL was in the first run of local authorities to submit their register for matching against the DWP database in June. Various algorithms were applied during this matching process relating to the name of the elector and the address. The results were marked as Red (no match) Amber (weak match) and Green (match).

- b) The dry run results are a precursor of what to expect when the live run happens in July 2014 . The Cabinet Office is using this to gauge the amount of work local authorities will have to undertake to optimise the matching process following the live run. This in turn will drive funding allocations. The live run will be the only opportunity to “passport” electors. Following the live run, LAs will have to undertake a series of measures under the IER regulations to increase the match rate ahead of the publication of the Register on 1 December 2015.
- c) The results were what we would have expected from a London Borough with a high transitory demographic. When undertaking some preliminary data matching we found that a number of red matches resulted from new electors moving in, where the old electors, who had probably moved out, remained registered. This is not surprising for a register that was six months out of date at the time of the dry run. When the live run is conducted in July 2014, the register will be four months out of date.
- d) Of the 192,280 electors submitted from our register for matching, 68.25% were Green, 4.59% were Amber and 27.15% were Red. To put these results into perspective the Cabinet Office tell us that the average match rate across Great Britain was 78% and the average for London was 68%.
- e) Table 1 shows the dry run results for all London Boroughs and Table 2 shows the dry run results for LBL wards and Parliamentary constituencies falling partly or wholly within the Borough.

4 Local data matching

- a) One of the measures that an ERO may take, at his discretion, in addition to those measures prescribed in the regulations, is to match registration data with local Council records.
- b) Following the dry run we compared the data on our register to the Council Tax National Fraud Initiative data. This enabled us to convert an additional 15,357 amber and red records to green, which improved our overall match rate from 68.25% to 76.23% as shown in Table 3.
- c) It should be stressed that neither dry run nor local data matching will change any existing records on our register. It is an indicator of what will happen when we undertake the live run and subsequent local data matching in July 2014.
- d) If the results so far are a reliable reflection of the likely outcome of the live run in July 2014, (and assuming the response rate to our 2012/213 canvass of 95.27% is maintained), we estimate that we will be able to passport approximately 80% of the electors on the register as at 1 July 2014.
- e) For those not passported, the process then will be as follows:-
 - Between July 2014 and December 2015, household enquiry forms will be sent to householders of properties that have not responded to the annual canvass and properties shown as void on our database (e.g. because of non eligible residents) seeking to

confirm data of residents at the address. If there is no response, by law, another form must be sent and if there is still no response, then a door knock must ensue. We will probably have to send out about 20,000 of these forms.

- Also between July 2014 and December 2015, approximately 40,000 invitations to register will have to be sent out. Broadly, these forms are to be sent to individuals on the register whose details do not match the DWP records, and to those not yet on our register of whom we are made aware. These people must provide a NINO and DOB. Again these must be sent at least twice if there is no response followed by a knock on the door. If they do not match they will have to provide other identification and some form of attestation (yet to be confirmed) to Electoral Registration Officer (ERO).
- f) We currently have 5143 absent voters that do not match. Absent voters are the only category of electors who will have to match ahead of the Parliamentary elections in May 2015 or they will lose their right to vote by post. They will however be able to vote in person at the polling station.

5 Risks

The key risks are:

- Fall in the electoral roll in December 2015
- The competing demands of the Mayoral, Local and European elections on the 22 May 2014.
- Registration rates via the late canvass (1 October – 17 February 2014) may fall
- Considerable potential for voter confusion
- Resources and expertise in Electoral Services who will be very stretched.

6. Next Steps

- a) Review funding adequacy when we are informed of the grants awarded by the Cabinet Office in October.
- b) Conduct canvass from 1/10/13 with a view to publishing a complete, accurate register by 17/2/14.
- c) Continue with local data matching and identify other potential local databases that may enhance our match rate immediately after the live run in July 2014
- d) Confirm IER state of readiness to Cabinet Office in November 2013. At this stage the Cabinet Office will make the decision to adopt IER nationally or defer it for one year to 1 December 2016
- e) Develop and implement an IER engagement plan with all partners alongside national initiatives targeting hard to reach groups and low responding areas.

- f) Conduct live run and local data matching in July 2014
- g) Confirm registrations of “passport” electors in July 2014 (estimated to be approximately 143,000)
- h) For non passported electors conduct targeted canvass and registration initiative, post July 2014

Table 1 London CDR Results

	Green	Amber	Red	Electorate
Barking & Dagenham	77.73	1.96	20.31	127,100
Barnet	73.14	3.50	23.36	245,499
Bexley	81.73	1.22	17.05	178,781
Brent	67.56	5.60	26.84	218,494
Bromley	81.29	1.99	16.72	237,664
Camden	52.23	13.27	34.50	151,741
City of London	53.89	3.91	42.20	4,086
Croydon	75.24	3.12	21.64	261,665
Ealing	70.50	5.30	24.20	241,879
Enfield	78.00	3.02	18.98	214,983
Greenwich	74.28	2.74	22.98	174,306
Hackney	60.83	5.83	33.34	172,474
Hammersmith & Fulham	55.70	12.80	31.50	124,606
Haringey	60.52	8.63	30.85	173,825
Harrow	76.32	2.55	21.12	179,814
Havering	83.30	1.40	15.30	186,682
Hillingdon	75.92	2.11	21.97	206,790
Hounslow	71.99	3.27	24.73	185,962
Islington	58.87	8.22	32.91	155,553
Kensington & Chelsea	46.90	12.60	40.50	106,702
Kingston	74.96	2.63	22.41	116,316
Lambeth	57.30	6.30	36.30	222,276
Lewisham	68.25	4.60	27.15	192,281
Merton	73.20	3.35	23.45	148,480
Newham	64.81	4.31	30.88	208,263
Redbridge	74.06	2.81	23.13	207,794
Richmond	75.65	3.40	20.95	136,864
Southwark	62.74	4.58	32.68	204,488
Sutton	81.23	2.19	16.58	143,520
Tower Hamlets	63.61	4.89	31.50	168,326
Waltham Forest	70.90	4.11	24.99	181,181
Wandsworth	60.33	7.50	32.17	227,049
Westminster	48.20	12.14	39.66	142,124
	68.22	5.03	26.75	5,847,568

Table 2 CDR results for LBL Wards and Parliamentary Constituencies

Ward/Constituency	Electorate*	Red Electors	Red %	Amber Electors	Amber %	Green Electors	Green %
Downham	10104	2013	19.92	195	1.93	7896	78.15
Whitefoot	9813	2113	21.53	209	2.13	7491	76.34
Bellingham	10094	2173	21.53	245	2.43	7676	76.05
Grove Park	10590	2380	22.47	221	2.09	7989	75.44
Catford South	10747	2404	22.37	456	4.24	7887	73.39
Lee Green	10300	2421	23.50	463	4.50	7416	72.00
Sydenham	11201	2749	24.54	534	4.77	7918	70.69
Forest Hill	10342	2618	25.31	457	4.42	7267	70.27
Crofton Park	10714	2743	25.60	531	4.96	7440	69.44
Perry Vale	11075	2937	26.52	521	4.70	7617	68.78
Ladywell	9842	2589	26.31	540	5.49	6713	68.21
Blackheath	9923	2823	28.45	516	5.20	6584	66.35
Evelyn	10997	3560	32.37	413	3.76	7024	63.87
Rushey Green	9551	2785	29.16	681	7.13	6085	63.71
Telegraph Hill	11239	3375	30.03	792	7.05	7072	62.92
Lewisham Central	12521	4150	33.14	793	6.33	7578	60.52
New Cross	11049	3928	35.55	434	3.93	6687	60.52
Brockley	12178	4450	36.54	833	6.84	6895	56.62
Lewisham Deptford	78540	24795	31.57	4336	5.52	49409	62.91
Lewisham East	71028	16939	23.85	2741	3.86	51348	72.29
Lewisham West & Penge	42712	10477	24.53	1757	4.11	30478	71.36
Borough	192280	52211	27.15	8834	4.59	131235	68.25

Table 3 match results for LBL wards and Parliamentary Constituencies following LDM
Confirmation Dry Run Local Data Matching

Ward/Constituency	Electorate	Green Electors	Green %	Green Electors	Green %	Change
Downham	10104	7896	78.15	8508	84.20	612
Bellingham	10094	7676	76.05	8355	82.77	679
Whitefoot	9813	7491	76.34	8064	82.18	573
Grove Park	10590	7989	75.44	8660	81.78	671
Catford South	10747	7887	73.39	8615	80.16	728
Lee Green	10300	7416	72.00	8228	79.88	812
Forest Hill	10342	7267	70.27	8108	78.40	841
Sydenham	11201	7918	70.69	8754	78.15	836
Crofton Park	10714	7440	69.44	8293	77.40	853
Perry Vale	11075	7617	68.78	8515	76.88	898
Ladywell	9842	6713	68.21	7499	76.19	786
Blackheath	9923	6584	66.35	7499	75.57	915
Evelyn	10997	7024	63.87	7945	72.25	921
Rushey Green	9551	6085	63.71	6877	72.00	792
Lewisham Central	12521	7578	60.52	8942	71.42	1364
Telegraph Hill	11239	7072	62.92	7948	70.72	876
New Cross	11049	6687	60.52	7684	69.54	997
Brockley	12178	6895	56.62	8098	66.50	1203
Lewisham Deptford	78540	49409	62.91	56409	71.82	7000
Lewisham East	71028	51533	72.55	56451	79.48	5103
Lewisham West & Penge	42712	30293	70.92	33732	78.98	3254
Borough	192280	131235	68.25	146592	76.24	15357

Appendix B - Canvass Results as at 17 February 2014

	2009	2010	2011	2012	2014
Local Government Electors	180159	184859	187342	191338	196431
European Parliamentary Electors	12,312	13,149	14247	15671	17456
UK Parliamentary Electors					
Lewisham Deptford	64,809	67,589	68314	70179	71650
Lewisham East	64,937	65,508	65726	66116	66937
Lewisham West & Penge	38,167	38,770	38974	39456	40141
	167,913	171,867	173014	175751	178728
Canvassed properties	117681	118115	119131	120383	121465
Canvass responses	107739	111730	113273	114683	113890
% return	92%	95%	95%	95%	94%

Appendix C

Ward Level Local Government Elections

	2011	2012	2014	
Bellingham	9,878	10056	10287	2.25%
Blackheath	9,839	9909	10330	4.08%
Brockley	11,830	12094	12489	3.16%
Catford South	10,448	10727	10950	2.04%
Crofton Park	10,341	10636	10767	1.22%
Downham	9,930	10066	10296	2.23%
Evelyn	10,375	10875	11378	4.42%
Forest Hill	10,203	10330	10714	3.58%
Grove Park	10,461	10590	10728	1.29%
Ladywell	9,599	9806	9901	0.96%
Lee Green	10,272	10273	10513	2.28%
Lewisham				
Central	11,766	12436	13099	5.06%
New Cross	10,472	10919	11339	3.70%
Perry Vale	10,768	10993	11172	1.60%
Rushey Green	9,559	9496	9785	2.95%
Sydenham	11,006	11201	11365	1.44%
Telegraph Hill	10,957	11130	11335	1.81%
Whitefoot	9,638	9801	9983	1.82%
	187,342	191338	196431	2.59%

Ward Electoral Ratio Variance

		Electoral Ratio	Variance	% Variance
Bellingham	10287	10913	-626	-5.73%
Blackheath	10330	10913	-583	-5.34%
Brockley	12489	10913	1576	14.44%
Catford South	10950	10913	37	0.34%
Crofton Park	10767	10913	-146	-1.34%
Downham	10296	10913	-617	-5.65%
Evelyn	11378	10913	465	4.26%
Forest Hill	10714	10913	-199	-1.82%
Grove Park	10728	10913	-185	-1.69%
Ladywell	9901	10913	-1012	-9.27%
Lee Green	10513	10913	-400	-3.66%
Lewisham				
Central	13099	10913	2186	20.03%
New Cross	11339	10913	426	3.91%
Perry Vale	11172	10913	259	2.37%
Rushey Green	9785	10913	-1128	-10.33%
Sydenham	11365	10913	452	4.14%
Telegraph Hill	11335	10913	422	3.87%
Whitefoot	9983	10913	-930	-8.52%
	196431	10913	0	0.00%

The LGCBE have a duty to conduct a PER "from time to time" of every principal local authority.

- 1) if more than 30% of the councils ward have an electoral ratio
(number of electors divided by the number of councillors) imbalance of 10% from the average
- 2) if one or more wards with an electoral ration imbalance of more than 30%
- 3) and the imbalance is unlikely to be self-correcting in the foreseeable future.