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response: Draft performance standards for Electoral Registration Officers You are in the Our consultations section Home Our consultations On this page Background Summary of consultation responses What happens next Draft performance standards First published: 2 June 2020 Last updated: 10 June 2020 Summary of the consultation outcomes

We commenced a 10 week consultation on a draft framework in January 2020 with the intention that we establish a new set of standards which can be used by Electoral Registration Officers (EROs) and us throughout the year to understand and improve their performance, ensuring ultimately that registers are as accurate and complete as possible, enabling everyone who is eligible and wants to, to be able to vote. Overall, the feedback we have received has been positive and respondents welcomed the proposed approach. On the whole, respondents agreed that the standards – with some minor amendments – along with the proposed tools and templates to be provided by the Commission, will support EROs with understanding and improving their own performance. However, as a consequence of the coronavirus pandemic, we recognise that not everyone who would have wanted to respond to the consultation was able to do so. We have therefore decided to defer finalising the standards for a year, to enable further feedback to be provided. Although we are not formally launching the standards this year, we nevertheless still believe it is important to make them and the accompanying tools and templates available as they form a key part of our guidance and support package which aims to assist EROs with planning for and delivering well-run electoral registration services across Great Britain. We will use the draft standards to inform our engagement with EROs over the next year and will report on their effectiveness before finalising them and laying them in the UK, Scottish and Welsh Parliaments by next summer.

Background Consultation background We have the power in law to: set performance standards for EROs issue directions to EROs to provide reports on their performance against the standards prepare and publish assessments of their performance against the standards We first introduced performance standards for EROs in July 2008 with the key objective of delivering a greater consistency of practice across Great Britain. We then introduced a revised framework in 2013 to support the transition to individual electoral registration (IER) and then again in 2016, following the introduction of IER. The reforms to the annual canvass being introduced this year provide us with an appropriate and timely opportunity to develop a new performance standards framework. However, we expect that electoral registration in and across Great Britain will continue to evolve and so we are keen to ensure that the new framework is sufficiently flexible to be able to adapt to further changes.

Developing the new standards Over the past year, we have been working collaboratively with representatives from across the electoral community – including the Association of s (AEA), Scottish Assessors Association (SAA) and Solace – to help shape the draft standards. After agreeing a set of key principles to underpin the new framework, we established a working group of electoral administrators from across Great Britain and held a workshop with them to scope out what a set of standards might look like. From this, we developed a draft standard around the accuracy and completeness of the electoral registers, which we tested with this group and the AEA, SAA and Solace. Their feedback informed the content of the draft set of standards that we consulted on.

Consultation The consultation was sent to a range of stakeholders, including: Ministers and officials in the UK and devolved governments political parties EROs electoral administrators a number of agencies, professional bodies and representative organisations. We received 34 responses to our

consultation from a range of organisations and individuals including: Chloe Smith MP, UK Minister for the Constitution and Devolution Michael Russell MSP, Cabinet Secretary for Government Business and Constitutional Relations Welsh Government various EROs and local authorities the Association of s (AEA) the Scottish Assessors Association (SAA) View the full list of respondents In addition, we also obtained feedback through discussions with stakeholders from across the electoral community during the consultation period. This included attending various meetings – including AEA branch meetings and SAA meetings – to talk about the draft standards and to seek feedback. The consultation asked for views on a number of questions on the proposed performance standards, including: whether the draft standards will support EROs to understand, improve and report on their performance whether our proposed approach to how we engage with EROs and their teams will enable us to provide effective support and challenge We are grateful for the feedback we received, whether by way of written responses to the consultation or through discussions at AEA and SAA meetings. However, as a result of the coronavirus pandemic, we know that not everyone who wanted to respond to the consultation was able to do so. Given the importance of ensuring we can take into account views from as wide a range of interested stakeholders as possible, we have therefore decided to defer finalising the standards for a year, to enable further feedback to be provided. Although we are not formally launching the standards this year, we nevertheless still believe it is important to make them and the accompanying tools and templates available as they form a key part of our guidance and support package which aims to assist EROs with planning for and delivering well-run electoral registration services across Great Britain. We will continue to welcome further feedback on the questions we posed in the consultation during the next nine months, which will also enable us to learn directly from the experience of using the standards to understand, improve and report on performance during the 2020 canvass. We will use the draft standards to inform our engagement with EROs over this period, and will report on their effectiveness before finalising them and laying them in the UK, Scottish and Welsh Parliaments by next summer. Further information on next steps can be found in the ‘What happens next?’ section below.

Summary of consultation responses Overall, the feedback we have received has been positive and respondents welcomed the proposed approach. On the whole, respondents agreed that the standards – with some minor amendments – along with the proposed tools and templates to be provided by the Commission, will support EROs with understanding and improving their own performance. Respondents also broadly welcomed our proposed approach to engaging with EROs and their teams over the course of the year. View the latest draft of the performance standards for EROs , which have been amended to reflect feedback received during the consultation. It is these standards which will be used in 2020/21 and on which further feedback will be sought to inform the final standards to be laid in Parliaments by summer 2021.

About the draft standards The new standards focus on the outcomes that should be delivered, rather than the processes that are followed, with the objective of helping EROs and their teams to understand the impact of their electoral registration activities. This should help EROs to make informed decisions on what activities are undertaken, how these activities are carried out and how their limited resources can be deployed efficiently and effectively. Whilst there was general agreement from respondents that the standards focus on the right activities, a number of respondents commented that although the consultation set out our approach to using the standards over the course of the year, there was no specific mention of registration actions impacting on the delivery of Returning Officer functions at an election, which is important in

ensuring that all those who want to vote are able to do so. We have therefore now included specific reference to this as part of the standards, through the addition of the activity 'Timely and accurate supply of electoral registers to the Returning Officer to support the conduct of elections'. The consultation responses also illustrated some confusion relating to the outcome titled 'Stakeholders and electors have confidence in the integrity of the electoral registers', with the use of the word integrity being interpreted as referring to electoral integrity rather than being read in line with the wider definition as was intended. We have sought to clarify this by amending the outcome to focus on the 'secure management of the electoral registers' rather than talking about their integrity. On the detail of this standard, we have also now added further references on cyber security processes and maintaining audit trails of how and when data has been transferred in response to feedback, making it more explicit how important these elements are in securely managing the electoral registers. Concerns were also raised by a number of respondents about being able to access, provide and analyse all the data listed in the standards. We believe that access to this range of information, which builds on the data already included in the existing performance standards, will be essential to enable EROs to understand, improve and report on their performance, so have worked with Cabinet Office on a better metrics project to help ensure that this data will be available within software systems and can be easily accessed by EROs when they need it. The additional tools and templates we are providing with the standards, in particular a tool which focuses on how to access, analyse and assess data, should help EROs to make full use of the information that is available to them. There were also some specific suggestions of additional information that could be included to help EROs to understand the impact of their activities – for example, data on the number of ITRs not responded to after the reminder and personal visit stages – and a number of these have now been added in to the standards. Several respondents highlighted the practical difficulties of identifying the number of additions as a result of different targeting approaches. While it will be important for EROs to use the available data on levels of additions and deletions to help them understand the impact of their activities, we have removed the specific reference to the 'Number of additions as a result of different targeting approaches' from the standards, recognising that EROs are not able to see from the information routinely available from the IER Digital Service what has driven an application to be made. Using the standards: Electoral Registration Officers EROs will use the data and qualitative information set out in the standards, and any other additional data or information that the ERO feels is relevant, to help them understand the impact of their activities, so they can identify what works, what doesn't, and where improvements can be made. To help them do this, we committed to developing additional tools and templates to sit alongside the standards, including a resource on using data, key performance indicator setting guidance and a reporting template. Respondents welcomed the proposal for additional tools and templates to support EROs in using the standards. In addition to the tools highlighted in the consultation, respondents asked for further guidance on how to use the standards and in particular how they can measure their impact and evaluate their activities. To respond to this, we will now also develop a 'How to' guide on using the standards which aims to help EROs and their teams understand what each element of the standards is trying to achieve and will provide examples of what the different items of data and information we list should show them, and how these can be used to help them understand the impact of their electoral registration activities. Our consultation also set out that whilst we

recognise the benefits of EROs using targets for their registration activity locally, we remain of the view that it would not be appropriate to set performance targets at a national level, given the activities and impacts will vary significantly by local area reflecting the particular demographics and circumstances EROs are each working within. We are, however, keen to support EROs with establishing a baseline of their own performance and setting targets which take into account their specific circumstances, and will be providing guidance and resources to assist with this. In particular, several respondents highlighted that they would like to be able to use data to compare their performance with other EROs. By transparently reporting on and publishing data, we hope to be able to support this activity, and will consider further how we can help to facilitate useful comparison as part of our ongoing support and challenge work. Using the standards: Electoral Commission The consultation set out our proposed approach to using the standards to inform how we engage with EROs and their teams over the course of the year – not just during the annual canvass period – with the objective of working with all EROs and their teams at least once every two years, continuing to use risk assessments to help prioritise the order, frequency and intensity of our engagement. Respondents broadly welcomed our proposed approach to engaging with EROs and their teams. One respondent, the AEA, highlighted that there will be a need for us to work closely with key stakeholders to understand where support and challenge is needed, ensuring that we capture those who need more frequent support. The risk-based approach is designed with this in mind, to help identify what level of support is required, and we continue to welcome working with others to help ensure that we identify where there are particular challenges so we can target our support and challenge as appropriate. Respondents also commented that when gathering information from EROs and their teams, we must be mindful of electoral cycles and other demands on the ERO, and allow sufficient time for them to submit the information required. As highlighted in the consultation, it is not the Commission's intention that EROs would routinely collate and provide us with all the information listed within the standards; instead, we will work with EROs and their teams to analyse the data and information to help us understand their performance and identify any issues or concerns. We will, however, still want to collect data from all EROs, to help us understand the state of the electoral registers across Great Britain, but we will consider the timing and number of these requests in order to keep them as straightforward for EROs as possible. We also set out that we intend to summarise the data and information gathered through our engagement with EROs and their teams to inform regular progress reports, rather than produce an annual assessment and summary of the performance of EROs. Through our reporting, we want to provide reassurance to the public and key stakeholders (such as political parties and elected members) that EROs are doing everything they can to ensure that everyone who is eligible and wants to vote is able to do so, and to highlight any instances where this is not the case. Respondents were keen that reporting should be used to report on the positive work and successes, and not to name EROs that have issues. While we remain focussed on supporting EROs to understand and improve their performance, we nevertheless have a responsibility to be transparent about where issues arise and will continue to use the standards to challenge EROs when needed, including making clear in our reporting where we find that the standards are not being achieved. We will, however, ensure that our reporting will also be used to celebrate success and share examples of good practice. More generally, we are committed to working with the AEA, SAA and Solace to look at how we can work together to most effectively identify and share good practice in electoral registration, which will be of particular

importance as lessons start to emerge from the first year of operation of the reformed canvass processes, and this work is an area that respondents were keen to see us expand into. What happens next While we are not seeking to finalise and lay the standards in Parliaments this year, we nevertheless want to make them available as they stand now, reflecting the fact that, with our guidance and resources, they are a key part of our guidance and support package which aims to assist EROs with planning for and delivering well-run electoral registration services across Great Britain. We will also be publishing additional tools and resources by the end of June. These products, which include a 'How to' guide on using the standards, key performance indicator (KPI) setting guidance and reporting templates, aim to help support EROs and their teams with using the standards to set targets and help them baseline their performance. This will give EROs a strong starting point for using the standards in future years to understand their data and any trends or variances, and to help them identify what works and what doesn't. We will use the standards in this period to help establish a picture of individual EROs' performance during the first reformed canvass as well as to understand more generally how the new processes are operating in practice. Taking a risk based approach, we will engage with a range of EROs throughout the canvass period and into early 2021, using the standards to inform our discussions. To prepare, we will let EROs know ahead of the discussion the types of information that we will want to discuss with them, which will vary depending on the point in the cycle we are engaging at, to help them understand the areas we will want explore, including the data that would be useful to look at. And whilst we will continue to report on electoral registration matters, in recognition of the fact the standards have not yet been laid in Parliaments, as well as recognising the wider impact of the coronavirus pandemic on the delivery of electoral registration services, we will not make any formal assessments of performance in the first year. Instead, we will use our reporting over this period to highlight the outcomes of our engagement with EROs, focussing on the activities being carried out and any trends, issues and challenges identified, as well as to draw out successes and examples of good practice. We will also continue to report more widely on the canvass as we have done in previous years, which will include an assessment of how the reformed canvass is operating in practice, which we aim to publish by the end of May 2021. We also intend to use this period to seek feedback on the effectiveness of the standards for understanding, improving and reporting on performance, ensuring that the standards work from the ERO perspective as well as from our perspective before they are finalised. We will gather feedback in the course of our discussions with EROs and will also seek to provide an opportunity more generally for wider input on how the standards are working.

Download the draft performance standards

New performance standards for Electoral Registration Officers

View the accessible version of the standards

Accessible version of the draft performance standards

Outcome: electoral registers are as accurate and complete as possible, ensuring that everyone who is eligible and wants to vote is able to do so

What inputs are needed?

ERO understanding and delivery of role and responsibilities

Management and oversight of delivery of the electoral registration service, including the statutory functions of the ERO, and stakeholder engagement.

Planning

Maintaining a plan for registration throughout the year, ensuring it is kept under review and evaluation is undertaken, with lessons learnt fed back in.

Resource

Identification and allocation of budget and staffing for electoral registration activities

Training

Identification and delivery of training to meet the needs of both permanent and temporary staff

What activities are being undertaken?

Identification of those not registered, including hard to reach groups:

Using available data and information sources, identify those not registered, including hard to reach groups Develop and maintain a public engagement strategy, ensuring planned activities are tailored to meet the needs of different groups of electors What information is needed to understand the impact of these activities? Analysis of the scope and usefulness of data and information Ward level analysis of the registration area Identification of priority areas to target registration activity Evaluation of communications channels and approaches, including cost/benefit analysis of previous activity, supporting development of engagement strategy and activities Undertaking year-round registration activity: Maintain the property database Contact potential eligible electors, including carrying out work to target hard to reach groups Ensure those no longer entitled to be registered are identified and removed Manage special category electors What information is needed to understand the impact of these activities? Number of properties with UPRN/as a percentage of properties Analysis of any issues reported with the allocation of properties to polling districts to reflect relevant electoral boundaries The accuracy and usability of data sources used Analysis of response rates by channel, to understand impact of different approaches Number of ITRs sent (by channel) Number of ITRs followed up Number of ITRs not responded to after the reminder and personal visit stages Number of electors whose identity has not been verified and have yet to provide documentary evidence Number of registration applications received Number of additions to the register Number of reviews of registration and number of deletions as a result Number of deletions not as a result of a review, by type Number of renewals sent Number of special category elector applications processed Number of special category electors renewed Administering the canvass: Using available data and information, identify the most appropriate method to canvass properties in your area Make arrangements to deliver the planned canvass activities Undertake the planned canvass activities What information is needed to understand the impact of these activities? The accuracy and usability of local data sources used Results of data matching (national and local) Number of households intended for each route Analysis of available communications channels (e-communications, telephone, mail), to inform contact with individual properties Number of households canvassed, by route and channel Number of communications sent, by route and channel Number of responses by route and channel Assessment of success of canvass communication channels used Number of canvassers recruited and trained Evaluation of canvasser performance What difference is being made? The demographics of the registration area and the needs of groups of electors within it are understood, enabling services to be targeted and designed to meet the needs of residents Barriers to registration are minimised, enabling all eligible individuals to register Potential new electors are identified and are given every opportunity to register to vote Changes in the registration status of individuals are captured and applied to the register in a timely manner Elections are effectively supported by the register How can we determine the success of our work? Performance against the KPIs/objectives set out in your registration plans Evaluation of public engagement activities undertaken, including of changes made to the register as a result of the activity Changes in levels of registration within and across the registration area, both generally and within identified under-registered groups An assessment of levels of additions and deletions, during the canvass and throughout the year A year-on-year analysis of additions and deletions Assessment of the numbers of electors who tried to vote on polling day but were unable to do so as a result of not being registered to vote Outcome: Absent voting is accessible, ensuring that everyone who is eligible and wants an absent vote is included on the relevant absent

vote list What inputs are needed? ERO understanding and delivery of role and responsibilities Management and oversight of delivery of the absent voting function, including the statutory responsibilities of the ERO, and stakeholder engagement. Planning Maintaining a plan throughout the year, including arrangements for managing the absent voting process. Resources Identification and allocation of budget and staffing for absent voting activities. Training Identification and delivery of training to meet the needs of both permanent and temporary staff. What activities are being undertaken? Supporting electors to engage with the absent voting process: Develop and implement a communications plan to ensure that electors are aware of the absent vote options available to them Ensure that all electors can access the absent vote process What information is needed to understand the impact of these activities? Evaluation of information made available to electors on the absent voting process to help them understand the options available to them Number of absent vote applications from different elector groups (overseas, service), by type (postal or proxy) Number and type of complaints received about ability to access the absent vote process Administering absent vote processes: Process new applications Process requested changes to absent voting preferences Maintain absent vote records and lists Develop and implement processes to identify and address potential integrity issues What information is needed to understand the impact of these activities? Number of absent vote applications received by type (postal or proxy) Number of absent vote applications rejected Number of absent vote confirmations sent Number of changes to voting arrangements processed Number of absent vote refresh notices sent, followed up and responses processed Number of postal vote applications for postal votes to be redirected to one address Number of postal applications from one address Number of proxy applications from one address Number of emergency proxy applications by type Number of applications referred to the police for investigation What difference is being made? Electors are able to make an informed decision on what voting method is best for them Barriers to absent voting are minimised, enabling all eligible individuals to apply Changes to voting arrangements are captured and applied in a timely manner The integrity of absent voting records and lists is maintained How can we determine the success of our work? Performance against the KPIs/objectives set out in your plans Analysis of complaints and feedback received about ability to access the absent voting process Assessment of the numbers and types of errors in the absent voter lists Outcome: Stakeholders and electors have confidence in the secure management of the electoral registers What inputs are needed? ERO understanding and delivery of role and responsibilities Management and oversight of delivery of the electoral registers, including the statutory functions of the ERO, and stakeholder engagement. Planning Maintaining a plan throughout the year, including details of the publication and supply of the register. Resources Identification and allocation of budget and staffing for electoral registration activities. Training Identification and delivery of training to meet the needs of both permanent and temporary staff. What activities are being undertaken? Publication and supply of the electoral register: Maintain record of those who are entitled to receive the electoral register Securely supply the electoral register to recipients Timely and accurate supply of electoral registers to the Returning Officer to support the conduct of elections What information is needed to understand the impact of these activities? Evaluation of arrangements for publication of the revised register and monthly updates to the register Evaluation of arrangements for supplying the register to those entitled to receive it Number of requests received, number of requests approved and when supplied Audit trails showing how and when data has been transferred Evaluation of methods for

transferring data Processes to ensure cyber security Timing of provision of the registers Information provided to recipients on appropriate use of the register What difference is being made? Everyone who is entitled to be supplied with the register receives data on time and in an appropriate format Electors have confidence in how their data is compiled, accessed and used Personal data is processed lawfully and transparently How can we determine the success of our work? Performance against the KPIs/objectives set out in your plans Analysis of complaints received from register recipients in relation to the provision of registers Analysis of complaints from electors about how their data is processed Stakeholders providing feedback Stakeholders providing feedback We received 34 responses to the consultation: UK and devolved governments (4) Chloe Smith MP, UK Minister for the Constitution and Devolution Michael Russell MSP, Cabinet Secretary for Government Business and Constitutional Relations Welsh Government officials (Local Government Democracy Division) Cabinet Office officials Representative bodies (4) Association of s (AEA) North East and Yorkshire Branch of the AEA Scottish Assessors Association The Runnymede Trust EROs and local authorities (26) Aberdeen City Council Ashford Borough Council Bristol Council Bromsgrove District Council/Redditch Borough Council Ceredigion County Council Cheshire West and Chester Council Chorley Council Cornwall Council Eastbourne Borough Council/Lewes District Council East Herts Council East Staffordshire Borough Council Gravesham Borough Council Halton Borough Council Herefordshire Council London Borough of Camden London Borough of Waltham Forest Luton Council Moray Council North Herts District Council Pembrokeshire County Council St Albans City and District Council Swansea Council Torbay Council Wealden District Council Wellingborough Council (one response from the Electoral Services Manager and one from the Electoral Services Officer) We also attended the following meetings to obtain feedback through discussions with stakeholders from across the electoral community: AEA branch meetings: Eastern, East Midlands, London, North West, Scotland and Northern Ireland, Southern, South East, South West and West Midlands Scottish Assessors Association Electoral Registration Committee Wales Electoral Coordination Board Wales Electoral Practitioners Working Group Related content Consultation: Equality, Diversity and Inclusion Strategy Statutory consultation on guidance for Returning Officers: Assistance with voting for disabled people Draft guidance for Returning Officers: Assistance with voting for disabled voters (statutory consultation) Cabinet Office consultation: The Wales Act 2017 (Consequential and Saving Provisions) Regulations 2018 Read our response to the Cabinet Office consultation from February 2019