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Proposals for reform of the annual canvass

Policy Statement

5th October 2018

Acknowledgements

This document sets out the revised model for the annual canvass which has been drawn up by the UK, Scottish and Welsh Government. The respective Governments have drawn on a productive working partnership with the Electoral Commission and representatives from the Association of Electoral Administrators and the Scottish Assessors' Association in the development of these proposals. This partnership has allowed the proposed policy to be informed by a shared understanding of the issues with the current canvass processes and evidence that new approaches would be effective. We thank them for their work to date and their continued contribution to challenging the policy thinking of the three Governments.

The authors would like to thank:

- Tom Hawthorn (Head of Policy, Electoral Commission)
- Laura Lock (Deputy Chief Executive, Association of Electoral Administrators)
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- Phil Thompson (Head of Research, Electoral Commission)
- Pete Wildman (Chair, Electoral Registration Committee, Scottish Assessors' Association)

In 2016 and 2017, 24 Local Authorities and Valuation Joint Boards delivered pilots to test whether or not alternatives to the legislated annual canvass exist that are more efficient and at least as effective. We also would like to thank the Electoral Registration Officers and their staff who delivered the 2016 and 2017 pilots:

- Barrow-in-Furness
- Bath & North East Somerset
- Birmingham
- Blaenau Gwent
- Camden
- Coventry
- Derbyshire Dales
- Dumfries & Galloway
- East Devon
- City of Glasgow
- Hounslow
- Luton
- Newcastle Upon Tyne
- Ryedale
- Salford
- South Holland
- South Lakeland
- South Norfolk
- South Oxfordshire
- Sunderland
- Torfaen
- Vale of White Horse
- Wakefield
- Woking

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Joint Ministerial foreword

We are very pleased to publish this joint policy statement setting out detailed proposals for the modernisation of the annual canvass in England, Scotland and Wales and requesting feedback on some important questions.

Electoral Registration Officers from all parts of Great Britain have observed that the current annual canvass of electors is outdated and cumbersome. The one-size-fits-all approach, incorporating numerous prescribed steps, takes little account of differences within and between registration areas. It is heavily paper based, expensive and complex to administer. It is also clear that the current process leads to confusion for the citizen. We are determined to ensure the citizen is at the heart of the process and has a positive interaction with our democratic system. It is therefore important that we modernise and streamline the process of the annual canvass to ensure that it is fit for purpose.

Pilots of four different models for conducting the annual canvass were run in 2016 and 2017 in England, Scotland and Wales. All models had strengths and delivered cost savings when compared to the legislated canvass. One key point to emerge from the pilots was that the majority of households reported no change in their composition. This holds the key for streamlining the process and enabling a more targeted canvass process. Electoral administrators also reported that the piloted models were considerably less resource intensive which allowed them to re-focus their available resources on targeting citizens who were not currently registered, particularly those from under-registered groups with whom it is more difficult to engage. All participating authorities believe the current canvass should be modernised.

Based on the evidence from the pilots, we believe that a hybrid model, taking the successful elements of each and refining certain processes, is the best way forward. The new model will have a data step at the start of the canvass, and then allow a mixture of e-communication (such as email), telephone and paper contacts where most appropriate. The new model will not require every household to respond when we can be confident there has been no change in composition, whilst ensuring safeguards are in place to protect the completeness and accuracy of the electoral registers. Greater discretion for Electoral Registration Officers to shape the canvass to activities which best suit their local circumstances and enabling them to target the properties they believe need to have their electoral register details updated are key aspects of the proposals.

Our intention is to amend legislation governing the annual canvass during 2019, with the desire for the whole of Great Britain to benefit from these changes from the start of the 2020 annual canvass. In order for us to achieve this we will each need to make legislation in our respective legislatures, the UK Parliament, the Scottish Parliament and the Welsh Assembly. The three Governments agree that, whilst each Government is of course free to set our own priorities and policies, we should seek to minimise divergence in electoral registration legislation and practice, as far as possible, in order to avoid unnecessary confusion, burdens and costs and to secure the highest standards.

We are committed to working closely together in order to introduce these changes across Great Britain and look forward to our continued work together on this matter. We believe that the changes proposed will be of enormous benefit to the citizen and electoral administrators and will effectively modernise the annual canvass.



A handwritten signature in black ink, appearing to read 'Chloe Smith', with a horizontal line underneath.

A handwritten signature in black ink, appearing to read 'Michael Russell', with a horizontal line underneath.

A handwritten signature in black ink, appearing to read 'Alun Davies', with a horizontal line underneath.

Chloe Smith MP

Minister for the Constitution

Michael Russell MSP

Cabinet Secretary for
Government Business and
Constitutional Relations

Alun Davies AM

Cabinet Secretary for Local
Government and Public
Service

Section 1 - How to respond

Views are sought from all interested parties on the overall structure of the proposed new canvass model and on a number of specific questions. Questions are asked throughout the document and are collated in a separate, downloadable Annex.

Respondents can provide their views by completing the online consultation hosted on behalf of all three Governments on the Scottish Government's consultation site at www.consult.gov.scot or by downloading the collated question form from www.gov.uk or www.gov.wales.

All responses will be shared with all three Governments.

Responses are requested by 5pm on 30th November 2018.

The UK, Scottish and Welsh Governments intend to publish a joint response to the feedback received. The intention is to publish the response alongside the draft legislation to reform the canvass, during the second half of 2019.

Section 2 - The current annual canvass

2.1 The current process

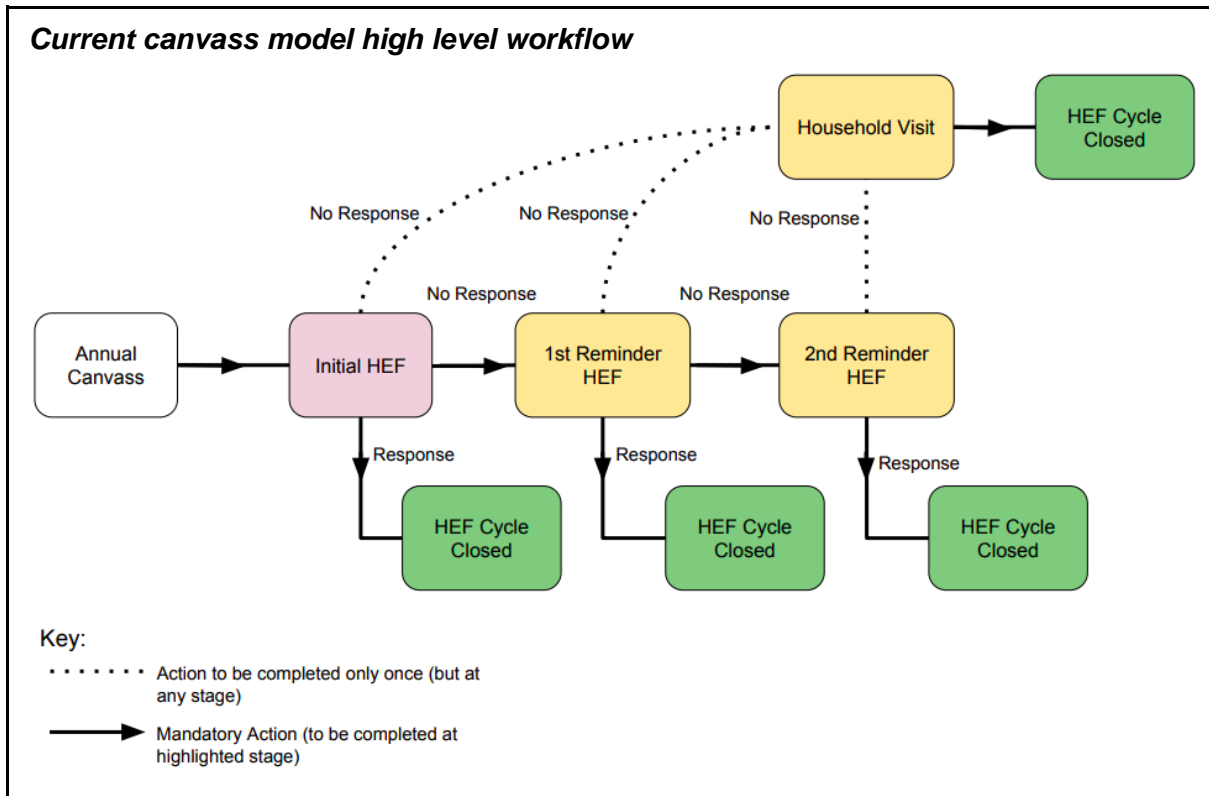
Electoral Registration Officers (EROs) are required to conduct an annual canvass of all residential properties in the area for which they have responsibility. There are 358 EROs in Great Britain: 319 in England, 22 in Wales and 15 in Scotland. In England and Wales, EROs sit at the Local Authority level. In Scotland, the majority of EROs are also Lands Valuation Assessors and employed by Local Authorities or where valuation areas are combined by a Valuation Joint Board (VJB).

In 2014, Individual Electoral Registration (IER) was introduced in Great Britain to replace the household registration system, where one person in every household was responsible for registering everyone who lived at that address. Under IER, each person in a household is required to apply individually to be registered to vote. They must also provide 'identifying information', such as their date of birth and national insurance number, which is used to verify their identity, as part of their application to register to vote.

Under Section 9A of the Representation of the People Act 1983 (RPA 1983) an ERO has a duty to maintain the electoral register for their area. Section 9D of the RPA 1983 requires an ERO to conduct an annual canvass of all residential properties in their area, usually between July and December each year, in order to identify everyone who should be on the electoral register. This means identifying citizens who should be registered but are currently not, as well as identifying electors who are no longer at a property and should therefore be removed from the register. A revised version of the electoral register must be published each year by 1 December¹, following the conclusion of the annual canvass.

EROs must send every household an annual canvass form, also known as a Household Enquiry Form (HEF). The HEF requires a response, regardless of whether there have been any changes in the household to report. Failure to respond is an offence. EROs must follow up any non-responses with up to two reminders and carry out a household visit if required. The household visit can be conducted at any stage; any of the initial, first reminder and second reminder HEF steps can be combined with the household visit or it can be conducted as a separate process. Each HEF must be issued in paper form and be accompanied by a postage paid return envelope.

¹ The publication of the revised register can be deferred until 1 February if there has been an election held in the area during the canvass period.



The current canvass gathers information on potential additions, changes and deletions to the register. However, since the introduction of IER in 2014, further action is required to convert this information into actual changes on the electoral registers. The annual canvass is therefore no longer a registration process in itself. EROs must individually invite potential new electors to apply to register, and verify their identity, before they can be added to the register. This process sits separately to the annual canvass but can, and generally does occur concurrently.

2.2 Issues with the current canvass model

The current annual canvass model has numerous issues:

Highly prescriptive and paper based

As described above, the current canvass process is highly prescribed in legislation, allowing EROs little scope to innovate or adapt their canvass process to best fit the needs of their local residents. Whilst this means that all properties across the UK receive the same process, it does not take into account that different property types and individuals may require a more tailored approach. It does not allow EROs to explore more efficient ways of canvassing or introduce modern technology into the process. The success of the digital service and online registration shows that there is clear public acceptance of moving to more a digital approach which is largely prohibited by the current process.

Every property must respond whether or not they have change to report

One of the key issues identified with the current canvass is that a resident from every property must respond, whether or not there is a change to report. The large majority of

households, some 88% across England and Wales,² and the position is similar in Scotland, remain stable from one year to the next; this means that these residents must respond simply to report that nothing has changed in the composition of their household. Many EROs have expressed frustration at this requirement. They argue that they should be able to target their canvass resources at properties where there is likely to have been a change of composition to report. This would also create a more sensible process for citizens.

Electoral Registration Officers now required to undertake a more resource intensive process

Prior to 2014, the annual canvass process registered citizens to vote as well as allowing the ERO to make amendments to existing entries and delete out of date entries directly from information provided on the canvass form. The accuracy of the electoral registers, and the security against potential fraudulent applications within the process, has benefitted from the introduction of IER. However, it has created a more resource intensive process to be completed by the ERO in their duty to maintain a complete and accurate register. The annual canvass is now an information gathering exercise only, with the ERO completing additional actions and processes for each change recorded on a HEF. For example, if someone new is added to the HEF, the ERO must now issue them an Invitation to Register (ITR) and follow the prescribed chasing cycle. The additional registration costs - which come on top of the existing cost of the annual canvass (now estimated at £52m per annum across Great Britain) - have been covered by funding from the UK Government. In 2017-18, the net additional funding was approximately £18.5m across Great Britain.

Citizen confusion caused by a 'two stage' process

Feedback from EROs indicates there is continued confusion from citizens about the new 'two-stage' process. Some citizens believe that by completing and returning the HEF they are registering to vote (as was the case under the old household system), leading them to ignore the subsequent Invitation to Register (ITR) and failing to register. Others, instead of completing and returning the HEF, are going online and registering to vote again. As there has been no reply to the HEF the ERO is obliged to continue the chasing cycle on the HEF, causing confusion for the citizen. Comments left on the online register to vote service demonstrate this confusion:

'I'm confused as I thought I'd registered to vote already and not sure why there is a difference in the household enquiry and register to vote forms as they ask the same information (eg, I'd already said that I wanted a postal vote on the previous form but had to do it again today)'

'I have completed a household enquiry form online which then took me to the Gov.UK register to vote page, where I re-submitted the same information but could not add information for other family members. This is not "joined-up" or

² Electoral Commission, The December 2015 electoral registers in Great Britain, July 2016
http://www.electoralcommission.org.uk/_data/assets/pdf_file/0005/213377/The-December-2015-electoral-registers-in-Great-Britain-REPORT.pdf

"streamlined" government.'

'A lot of people who fill in the Annual Canvass form will assume that they are then registered to vote when in fact they are not and will be disenfranchised as a result.'

This confusion leads to a multitude of issues, the first and foremost is a negative impact on citizens' experience of electoral registration which could, in turn, impact their view on engaging with democracy. It also increases the cost of the annual canvass and registration with citizens failing to complete the legislated process, leading to costly reminders.

Changing nature of how citizens engage with registering to vote

Online registration was made available in Great Britain in 2014. It is quick and easy and fits with the way citizens increasingly live their lives. Online registration has been overwhelmingly successful, with over 25 million online applications to date. This has had an unexpected consequence: citizens are increasingly opting to register outside the canvass period. For example, in 2016 there were twice as many additions to the register outside the canvass period than during the canvass³, signalling that the canvass itself is becoming less important in registering eligible electors. Online registration has also generated more election-focused registration applications, with significant peaks in the lead up to the registration deadlines for elections. For example just under 2 million⁴ applications were submitted in the two weeks leading up to the registration deadline for the UK Parliamentary Election in 2017. The canvass is now only one of numerous ways that the ERO is able to update their electoral registers.

To attempt to address these issues with the current canvass process, the Cabinet Office piloted schemes over the 2016 and 2017 canvass. Four models were designed by Electoral Administrators and piloted across 24 Local Authority areas in England, Scotland and Wales. Both the Cabinet Office and the Electoral Commission produced evaluations of the pilots⁵. A summary of the Cabinet Office evaluation can be found in Annex 2. These pilots have informed the proposed model for the annual canvass going forward.

³ Electoral Commission, Analysis of the December 2016 electoral registers in the United Kingdom, March 2017 https://www.electoralcommission.org.uk/_data/assets/pdf_file/0010/222877/Analysis-of-the-December-2016-electoral-registers-in-the-United-Kingdom.pdf

⁴ 1,912,950 applications were made online between 9 May and the 23 May 2017

⁵ <https://www.gov.uk/government/publications/piloting-alternative-electoral-canvassing-models>
https://www.electoralcommission.org.uk/_data/assets/pdf_file/0006/244608/Annual-canvass-reform-pilot-scheme-evaluation.pdf

Section 3 - Canvass Reform

3.1 Proposed new model for the annual canvass

In developing the proposed new model for the canvass we have tried to ensure that it:

- enhances the citizen experience
- is informed by evidence from the pilots undertaken in 2016 and 2017 and other sources where appropriate
- is streamlined, lower cost and financially sustainable
- is less prescriptive and “one size fits all”, giving EROs greater discretion to tailor the canvass to local circumstances
- is trusted and secure, with increased resistance to fraud
- maintains the completeness and accuracy of the register
- includes the capacity for innovation and improvement, and is adaptable to future change.

The annual canvass is still a crucial means to help EROs identify additions and changes to the electoral register. We will not therefore be looking at abolishing the annual canvass process as a whole.

The purpose of the canvass of households under the revised model will be the same as under the current model, that is to find out -

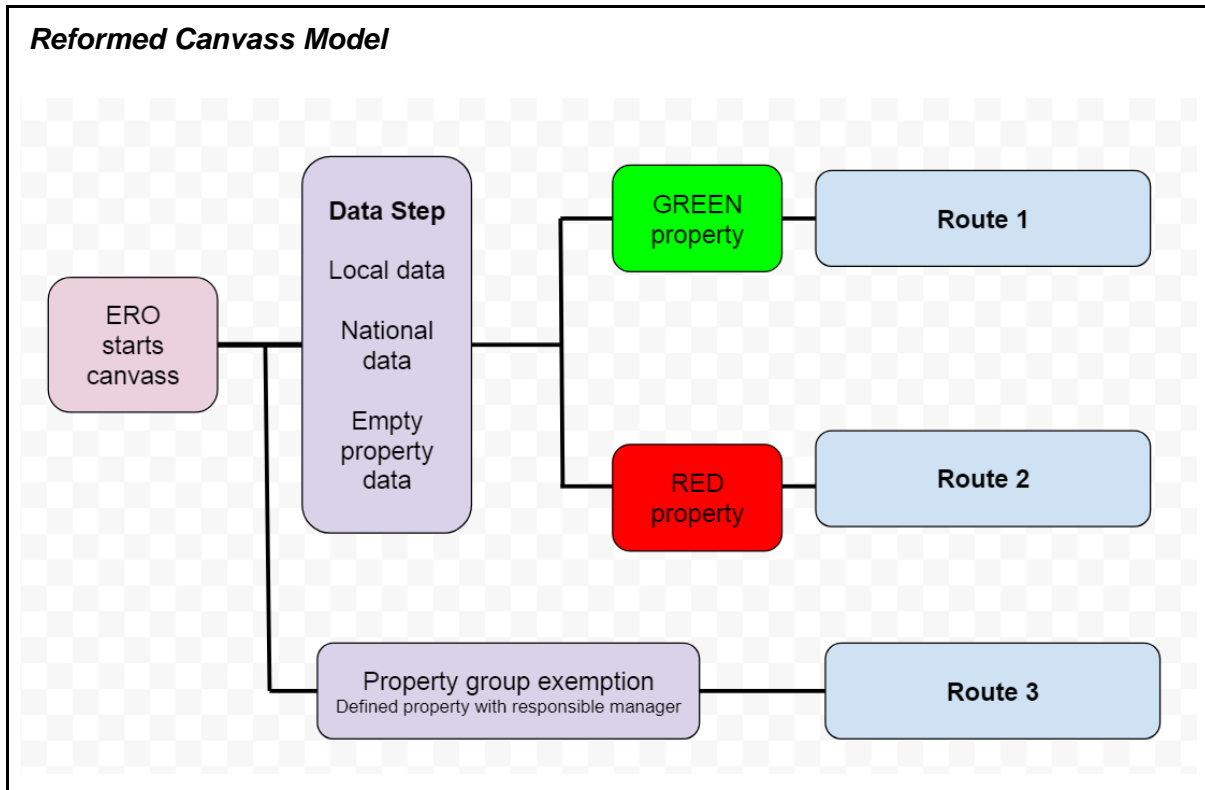
- (a) the names and addresses of persons who are entitled to be registered but who are not already registered;
- (b) those persons who are on the register but who are no longer entitled to be registered at a particular address (normally because they have moved).

However, the annual canvass process is only one of the many ways an ERO is able to find information to update their electoral register. It sits alongside year round activities such as mining other datasets (such as council tax records, etc.) to identify residents who are not currently registered to vote, and specific targeted work for certain groups. This means we want to make the annual canvass process more targeted and efficient. We also want to ensure that every property is contacted during the canvass period, to ensure there is the opportunity to report changes in those resident in a property if required.

From the issues identified with the current process and the evaluation from the 2016 and 2017 pilots, the Government believes there is clear merit in enabling the EROs to more effectively target their resources towards the properties where the occupiers have changed and the electoral register needs to be updated. This will allow them to ensure their resource is targeted at the citizens that need it. It will allow for a more streamlined process to some properties, whilst other properties will have a more comprehensive process to ensure that information is returned.

The proposed new canvass model will incorporate a ‘data discernment step’. This will inform the ERO which properties have not changed household composition, based on data held on other sources. The ERO will then have the choice to follow one of two routes for each

property. Route 1, for properties where the data suggests no change in household composition and Route 2 for properties where the data matching highlights that there may be a change to the information the ERO currently holds for the property. This will allow the canvass process to be streamlined for those households that do not change each year and enable the ERO to target their resources to where responses and updates to the electoral register are required.



More detail is provided for each part of the proposed changes in the remainder of the document.

3.2 Delivering the proposed changes

Competence in relation to the registers of local government electors in Scotland and Wales, including the annual canvass for those registers, has been devolved. These means that the UK Government and Parliament are responsible for electoral registration in relation to national elections across Great Britain⁶, local government elections in England and Police and Crime Commissioner elections in England and Wales. The Scottish Government and Parliament have executive and legislative competence for electoral registration in relation to Scottish Parliamentary and local government elections in Scotland, and the Welsh Government and National Assembly for Wales have executive and legislative competence in relation to elections to the National Assembly for Wales and local government elections in Wales. Given this ‘shared competence’, reforming the canvass across Great Britain requires legislation in all three legislatures.

⁶ and Northern Ireland

The shared intention is for legislation to be passed in all three legislatures before the end of 2019. The changes would then be implemented for the 2020 annual canvass which will commence from July 2020. Work has already started on implementation planning on the basis of these proposed changes, to ensure that EROs and their staff could be ready to effectively run the proposed new canvass model, subject to the outcome of consultation responses in respect of the proposals, and the agreement of the respective legislatures.

Section 4 - Data discernment step

4.1 The data discernment step process

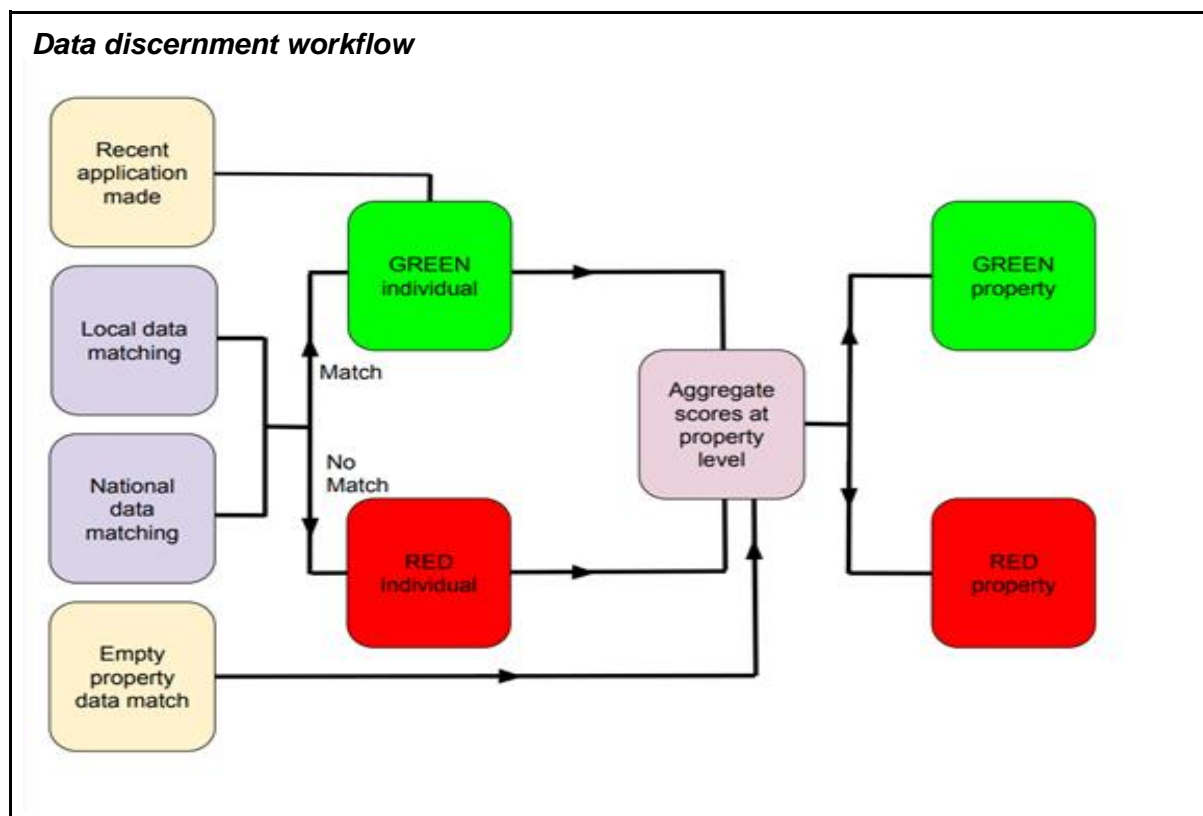
At the start of the canvass process, each ERO will be required to upload their electoral register to the Individual Electoral Registration Digital Service (IER DS) (which is the system used to verify the identity of applicants to register to vote). A data matching exercise will be undertaken, comparing each electoral register against national data set/s. The data matching process will occur at an individual elector level, matching name, date of birth (where held) and UPRN⁷. We are currently exploring the potential to use the Department for Work and Pensions' Customer Information System (DWP CIS). This dataset is already used in the electoral registration process to verify an applicant's identity. Other national datasets may also be used in the future. The ERO will then download the results of the data matching into their system from the IER Digital Service.

In addition to the national match, EROs will have the discretion to match their electoral register against locally held datasets, such as council tax and housing benefit data. For some EROs, matching against local data will be an essential step, because national datasets could be less complete or up to date in some areas, for example, if there is a high level of population movement. Unlike the national data matching exercise though, the ERO will have to complete this matching process themselves using their own IT systems.

The data matching, both national and local, will be conducted at an individual elector level. If an elector matches a record held on either of the national or local data sets, they will be deemed as 'matched' and will be marked as a green match. If an elector does not appear on the national or local data sets, they will be deemed as 'not matched' and will be marked as a red match. The ERO will have the discretion to override an individual's result if they have a valid reason to do so. As the canvass process functions at a property level rather than an individual level, the ERO will then need to determine the overall match rate of the property. Again, the property match status will be either green or red. We believe that for any property with one or more red electors, the property as a whole should be deemed red. A property should only be deemed green if all electors currently registered there are green at an individual level.

There will be some exceptions to the process as described. These are detailed later.

⁷ UPRN = Unique Property Reference Number, a number allocated to every property and piece of land by the local authority for record purposes.



The pilots have shown that the key to a successful data discernment step is that the data used must be of high accuracy.⁸ We know from a study completed in 2012 by the Cabinet Office, in preparation for the transition to IER, that the DWP CIS dataset was on average 95.4% accurate where a green match was reported against the electoral register⁹. It is also acknowledged as one of the most comprehensive datasets in the country, covering virtually all those aged 16 years and above. Following discussions with DWP there is no reason to believe this accuracy rate has decreased, indeed it is more likely that the accuracy has probably increased. Where local data is used, this too, will need to be of high accuracy to ensure that the correct matching is taking place. The dataset/s do not have to have particularly wide coverage but do need to be of the highest accuracy. If low quality datasets are used this will lead to occupiers at properties not receiving the most appropriate canvass process. We are looking at ways to enable the ERO to evaluate the quality of the available data sources.

A successful data discernment step is one where:

- a property where the composition remains stable and consistent with the electoral register, receives a green match and is sent down Route 1.
- a property where the composition has changed, and is different to the details held on the electoral register, receives a red match and is sent down Route 2.

Whilst working with national data suppliers and the IER Digital Service in the development of the technical processes, we will ensure that data will be processed in compliance with data

⁸https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719824/Piloting_Alternative_Electoral_Canvassing_Models_-_Full_Report.pdf

⁹https://www.electoralcommission.org.uk/__data/assets/pdf_file/0009/154971/Data-matching-schemes-confirmation-process-evaluation-report.pdf

protection requirements. We also work closely with the Electoral Commission and others to ensure electoral administrators have the required knowledge and skills to process local data in compliance with data protection requirements.

We invite responses to the following questions relating specifically to the proposed process in Section 4 - Data Discernment Step:

Question 1

We are proposing that the national data matching process is mandatory to complete, with local data matching being conducted at the ERO's discretion.

Do you agree that this is the right approach? YES/NO

Please explain your reasoning.

Question 2

We are proposing that any property with a red elector should be converted into a red property. A property will only be green if all of the electors in the property are individually green.

Do you agree this is the right approach? YES/NO

Please explain your reasoning.

Question 3

Do you think a minimum standard for the accuracy of locally held datasets should be mandatory? YES/NO

Please explain your reasoning.

4.2 Exemptions from the standard data discernment step

Void property matching

For the purpose of this document the following definition has been used:

Void property - a property with no current registered electors. A void property could have no registered electors for a variety of reasons including: legitimately empty; only individuals who are not entitled to register to vote are resident; second home premises; where a change in composition has recently taken place and new occupiers have not registered to vote; where the occupiers have previously refused to register to vote.

It is proposed that an ERO will be able to complete a void property data match as part of the local data matching process within the data discernment step. For properties where an ERO has sufficient data to confirm that it is currently empty or should remain void, then the

property can be marked as a green match. If the ERO does not have any other data to support that it should be void then the property will be marked as red and follow Route 2. These properties will then receive either the Route 1 or Route 2 process, as per the other properties that go through the standard data discernment step.

We invite responses to the following question relating specifically to the proposed process detailed above:

Question 4

Do you agree that Empty and Void properties should be sent through a data matching process? YES/NO

Please explain your reasoning.

Recent applications

We know that the ERO can hold more up to date information than other data sources if the citizen has only recently moved and completed an application to register to vote. Where this is the case, we propose that before the data step, any elector who has recently completed a successful application to register will be exempt from the data step and will automatically be marked green. Options for this time period might be for example 1 month, 2 months, or linked to the last monthly update. This exemption time period will probably be defined in legislation. Two major factors in defining the exemption time period are the interaction of electoral registration and election events (usually held in May/June) and the fact an ERO can start their canvass whenever they see fit with many choosing to start between the beginning of July and beginning of September.

We invite responses to the following questions relating specifically to the proposed process detailed above:

Question 5

Do you agree that recent applications to register should be exempted from the data step and automatically marked as green? YES/NO

If Yes, what time period do you think should be defined as “recent” (1 month, 2 months, linked to the last monthly update? etc). Please explain.

If No, please explain your reasoning.

Single occupancy tick box

It has been suggested that we should not have the single occupancy tick box on individual electoral registration applications. This was introduced in 2015 as a cost saving measure to enable EROs not to follow the standard canvass process if the single occupancy tick box was checked. However, we understand that applicants are often confused by what is being

asked of them here, and either wrongly tick this box, or leave it blank. Because of the risk of incorrect use, we understand that many EROs do not rely on the single occupancy tick box to suppress the HEF in the next canvass (if the application is made between 1 December and start of the next canvass) or the reminder HEFs (if the application is made during a canvass period).

It also would appear somewhat illogical under the reformed canvass for a property that had one green elector to be sent no communication, whereas a property with two green electors would be sent a communication.

We invite responses to the following question relating specifically to the proposed process detailed in above:

Question 6

Do you agree with no longer including a single occupancy tick box on registration application forms? YES/NO

Please explain your reasoning.

Section 5 - Route 1: the lighter touch route

Under the current canvass process EROs must send every residential property in their area a Household Enquiry Form (HEF) and are required to follow up non-responses with two reminders and, if necessary, a household visit. Whilst the majority of households do not need to report a change in household composition, the ERO needs a response from every household.

A key feature of the proposed model for canvass reform is that, where the ERO can 'match' all electors at the property using nationally and locally held data, they will be directed down Route 1. Green match households should have no change in composition and therefore there will be no need to inform the ERO of any major changes¹⁰ (i.e. elector addition or deletion). In such a situation, it is unnecessary and wasteful for the ERO to have to use resource in chasing up responses in these circumstances.

We propose that green match households will be sent a simple communication setting out everyone who is registered at the address. We consider that it is important that even green match households are contacted by their ERO at least once during the canvass, to provide an opportunity for the household to let the ERO know if anything has changed. A crucial difference from the current canvass process is that if no response is received from these properties the ERO will have the option to not follow up for a response.

This initial communication should generally be by paper - which will ensure that the occupiers of a property receive the correspondence in order to amend details if required. Given that there will be no requirement to respond if there is no change, it will be important that the ERO is confident that the current occupiers of the property receives this communication.

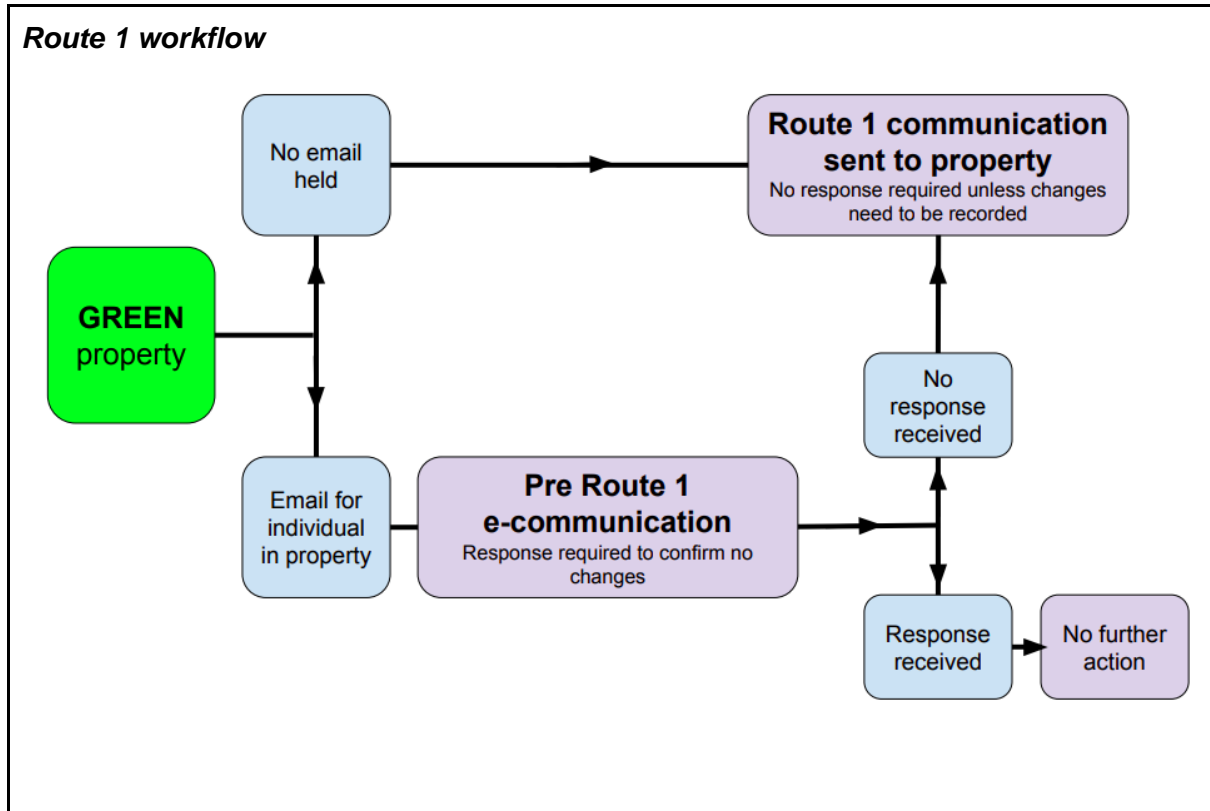
However, we also acknowledge the desire of both administrators and citizens to move to a more digital-enabled process and thus propose to allow an e-communication¹¹ for this stage of the process. During the canvass pilots, email communication was trialled and, whilst many benefits were realised, some risks were identified. For example, there is no clear connection between a property and an email address. Given this, we are proposing that e-communications can be used but will require specific confirmation from the elector that their details are still correct to act as a safeguard. This is expected to be a simple one click process. If the elector fails to respond to an e-communication then the property will be sent a paper communication to ensure the occupants receive the information.

It is most likely that EROs will use email in this pre-paper e-communication, although future developments will be allowed for, such as a notification through a Council account. The email will be sent to any elector, over 18, in the property who the ERO holds an email address for. The use of email will be subject to data protection requirements to ensure the

¹⁰ A major change would consist of an addition or deletion required, directly impacting the completeness and accuracy of the register. A minor change, by contrast, would be where an elector wants/needs to change a small detail of their register entry such as that they are now aged over 76 (exempt from jury service).

¹¹ An e-communication would include any electronic communication, for example an email or a notification through a Council account.

appropriate security of electors' information. Given the low cost of sending emails and that any non-responders would still receive a paper contact sent to the address, there are clear advantages to a pre-paper e-communication stage. This option will only be available where an ERO believes there is no change in the composition of the household, so email addresses for current electors should still be correct. In addition, responses to the email will reduce the number of unnecessary paper contacts which will need to be sent; a further cost saving.



We invite responses to the following questions relating specifically to the proposed processes detailed in Section 5: Route 1: the lighter touch route

Question 7

Do you agree that an email contact should be permitted as the first form of contact for households in Route 1 (where an email address is held), followed by a paper contact if there is no response? YES/NO

If No, please explain your reasoning.

Question 8

Do you agree with the proposed process for the Route 1? YES/NO

Please explain why.

Question 9

Do you agree with the proposal to exclude mandatory follow up activity (reminders and household visits, etc.) with households sent through Route 1? YES/NO

Please explain why.

Section 6 - Route 2: the full canvass process

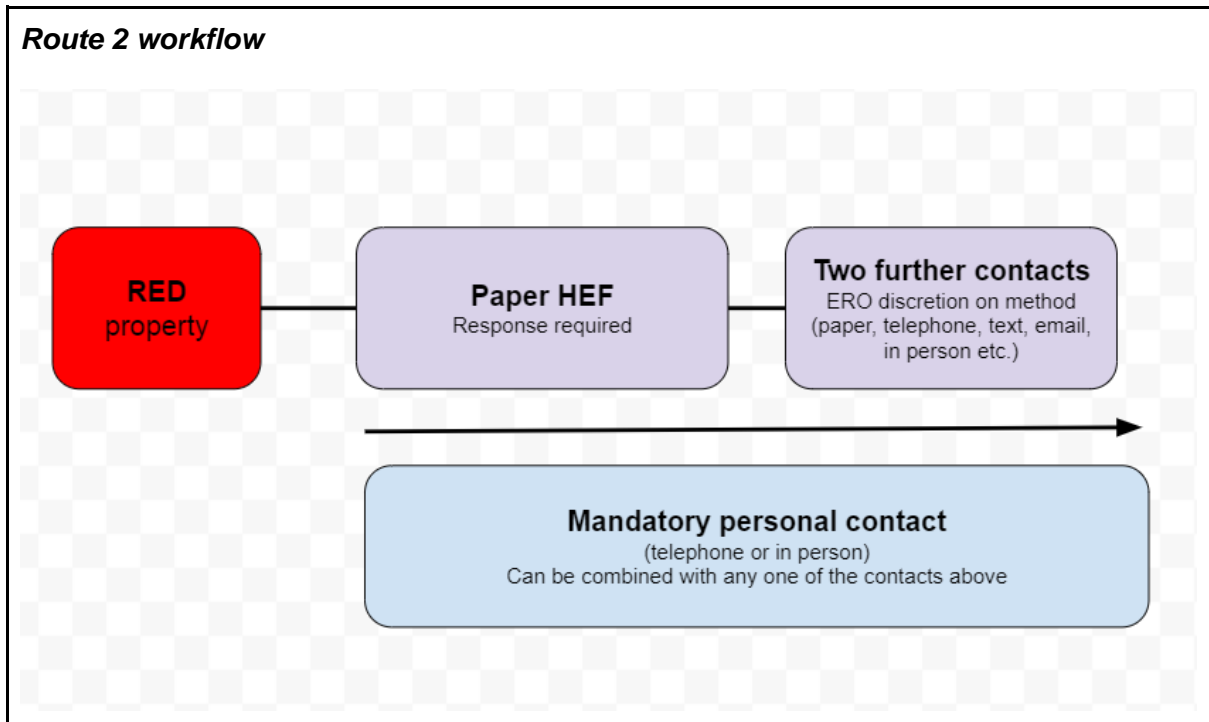
6.1 The Route 2 process

Where an ERO is unable to confirm through data matching that the household composition has not changed, it is proposed that the household will be sent down a full process, Route 2. This will be similar to the current canvass model used for all households. Nationally, we anticipate approximately only a quarter of all households will need to go down the Route 2 process, although this will vary from one area to another. This will deliver significant cost savings and reduce the administrative burden.

Under Route 2, EROs will still be required to make up to three contacts with a household plus, if required, a mandatory personal contact (this is covered in more detail in the next section). However, we propose to incorporate important reforms from the pilots which, if the ERO decides to use them and has the contact details necessary, will permit different methods of communication, as opposed to paper based forms.

Our proposal is that properties sent down Route 2 will be sent an initial paper contact. As Route 2 is to be used for properties where data matching reveals some doubt about the current household composition, it is important that the ERO makes contact with the occupiers at the property.

In the event of a non-response, the ERO will then be required to send up to two further reminders along with a mandatory personal contact stage. EROs will have discretion over how each reminder is sent, which might be by post, email, SMS text, telephone, in person or electronically through a council account. This will enable the ERO to tailor their reminder stages to the most appropriate for the area and the individuals involved. Our intention is that the reformed canvass will accommodate current, and to the extent possible, future, developments in communications technology. The pilots have shown that a mixture of communication methods is more effective than multiple uses of the same communication method, e.g. some individuals are more likely to respond to a text message than a written letter.



A red match, particularly with DWP data, does not indicate that an elector is definitely not resident at a property. The 2012 data pilots ascertained that the accuracy rating for red matching is substantially lower than for green matching. So, whilst an ERO can be confident that a green match means the elector is still residing in the property, the reverse is not true for a red match. Rather, it indicates a degree of uncertainty about whether the elector is still present. In the case where the red match elector is still there it will be important for an ERO to receive confirmation of this in the form of a no change response. Equally, if the red match is correct and new citizens have moved into the property, or old occupants have left, it will be vital for the ERO to receive this change information. Both scenarios rely on the occupier returning a response to the ERO, and the pilots have shown that a combination of different contact methods can be more effective at gaining a change response.

We invite responses to the following question relating specifically to the proposed process detailed in Section 6.1: The Route 2 process

Question 10

Do you agree with the proposed process for Route 2? YES/NO

Please explain why.

6.2 Personal canvassing

As indicated in the section above, we are minded to continue to mandate a personal canvass. House to house inquiries (door knocking) are known to be highly effective in capturing changes in household composition. Data collected by the Cabinet Office during the 2015 canvass shows that the response rates for house to house inquiries were higher than the initial and first reminder postal HEFs. Equally, data from the canvass pilots shows that household inquiries, delivered with or without a second reminder HEF, captured changes in household composition at a higher rate compared to the second reminder HEF on its own.

At the same time, we also recognise that there are issues associated with household inquiries including: cost and the recruitment and management of canvassers, etc.

We have therefore considered at great length whether house to house inquiries should continue to be a required element in the revised canvass model. We have concluded that they should, albeit in a more flexible form. We propose that where an ERO does not receive the information required in Route 2 of the canvass they should make a personal contact with a member of the household at some stage during the canvass period. This could be via a house to house inquiry as now, or by telephone, where these details are held.

We invite responses to the following question relating specifically to the proposed process detailed in Section 6.2: Personal canvassing.

Question 11

Do you agree that a personal contact (door knock or telephone call) should be a mandatory element of the revised canvass? YES/NO

Please explain why.

Section 7 - Exemptions for certain types of property (Route 3)

There are certain property types where the current canvass model does not work well. These property types are characterised by having multiple occupants at the same address, who may, in many circumstances, only stay at the address for a limited period. Typically, there will be no one resident who can or will take responsibility for accurately completing the household enquiry form for all other residents. Under the proposed new model these property types will most likely be red matched in the data step, sending them to Route 2. However, we know that these types of property do not respond well to traditional canvass processes, resulting in an unproductive and costly chasing cycle.

Canvass reform allows the opportunity to ensure that these property types are subject to a more suitable canvass process for their needs. It is proposed that properties of this type are exempted from both the data discernment step at the outset of the canvass and normal canvass processes. Instead, these properties will be sent down a separate Route 3 process, where the ERO can require a single officer responsible for the property (such as a landlord) to provide a list of the eligible residents at the property. Where the ERO is successful in gaining a list of eligible residents, this is not intended to enable 'block registration' of the individuals in these properties. The data provided will only inform the ERO who should or should not be on the register. The EROs must then issue ITRs to any eligible individuals who are not currently registered. Alternatively, where it does not prove possible for the ERO to obtain a list of eligible residents, EROs will be obliged to follow the Route 2 process and issue a household canvass form followed by the chasing cycle.

Certain property types are already defined in legislation and where a single responsible officer can be identified (such as Houses in Multiple Occupation (HMOs), care homes, student halls of residence etc.) these will be suitable for the purpose of the Route 3 process. This route will be optional for the ERO and indeed they may choose not to utilise this. An ERO, however, will need to keep their property classifications up to date to utilise this route effectively.

We will also consider whether it is possible to place an explicit duty in legislation on responsible officers at identifiable property types to provide EROs with this information when asked to do so, consistent with data protection legislation.

We invite responses to the following questions relating specifically to the proposed process detailed in Section 7: Exemptions for certain types of property (Route 3)

Question 12

Are there property types in addition to those detailed above that you believe should be directed to Route 3?

Please list and provide your reasoning.

Question 13

Do you believe this is the correct process to deal with these properties? YES/NO

If No, can you suggest an alternative approach?

Question 14

Do you believe that sending these properties into Route 2, the full canvass, if the ERO is unable to obtain data, is the correct safeguard for these properties? YES/NO

Please explain your reasoning.

Section 8 - Treatment of 'pending' and 'potential' electors

Some citizens are 'known' to the ERO prior to them becoming an elector on the electoral register. This could be for example a pending elector, who the ERO has identified through data mining and is currently working through the ITR chasing cycle, but as yet has not made an individual application to register. We have considered how such individuals should be handled in the revised canvass model and propose that they should be included in the reformed canvass process. In considering this we have taken into account the primary purpose of the canvass: to understand the composition of the household at the property, who is living there who should be on the register, and who is on the register but no longer living there.

As pending and potential electors are citizens who the ERO has knowledge of at a given property, there is an argument that they should be included in the data match, i.e. they would receive a green match at the individual level despite not yet being on the register, and they would appear on any subsequent communication sent to the property. A property should not be sent down Route 2, just because there are known pending electors at the address. This is arguably not targeting canvass resources in the most the effective way. If the ERO has the correct information on who lives in the property - whether they are registered or a potential or pending elector - then the ERO should not have to expend valuable resources on confirming this. Instead, in the example where the ERO has potential and pending electors, they should be able to focus their resource on the registration rather than the canvass process.

Obviously any communications (the Route 1 communication and the HEF communications Route 2) that they were included on, would need to be carefully designed to ensure clear messaging that the potential or pending electors were not currently registered to vote.

We invite responses to the following question relating specifically to the proposed process detailed in Section 8: Treatment of pending and potential electors.

Question 15

Do you agree with the proposal that pending/potential electors should be included in the data matching and canvass communication? YES/NO

If No, please explain why.

If Yes, do you think there are any risks in doing so? YES/NO

Please explain what these are.

Section 9 - Form design

From the evaluation of the pilots and other sources we know that the content of the communications and the design is important in ensuring citizens clearly understand what, if anything, they are required to do in response. The communications sent to the public will be instrumental in the success of the reformed canvass.

The Electoral Commission (EC) currently has responsibility to design registration forms, which are subject to the approval of the Minister for Cabinet Office following consultation with the Scottish Ministers in respect of forms for use in Scotland and the Welsh Ministers in respect of forms for use in Wales, and there are no plans to amend this. We will work closely with the EC in order to achieve a comprehensive and simple suite of communications.

We will be looking at what details should be prescribed on the forms and communications, with the view of reducing the amount of prescribed elements and therefore making them more adaptable to changing circumstances. The design will then be the responsibility of the EC. We and the EC will use behavioural insight techniques and user testing as part of this process to ensure optimum design. Because we intend to invest in developing forms which we are confident will elicit the desired response from citizens, we intend to require EROs to use these forms.

Question 16

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

Question 17

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

Section 10. Other proposed reforms

10.1 Gathering HEF and ITR information as one

Whilst the planned reforms to the annual canvass focus on streamlining the process, they will not really address the confusion over the 'two stage' process. The two stage process risks confusing someone who is completing a HEF and registering to vote at the same time. We are looking at the two following options to address this issue:

- Incorporating a question in the individual registration application (online and on paper) asking the applicant to list anyone else who lives at the property and who is eligible to register to vote. This means that the ERO should be able to identify citizens who need to be sent an ITR throughout the year, rather than just at the canvass. The fewer people who need to register to vote off the back of completing a HEF, the fewer people risk being confused by the process.
- Streamlining the online HEF process to allow a new elector to add all the required information for their registration as part of their online HEF journey. This would be for the person who was completing the online HEF only. Any other new electors identified would need to make separate individual applications. This would mean that each citizen would have only one interaction, the citizen completing the HEF, would have one interaction with the HEF but include their own personal individual application information; and for the other citizens in the property, they will be directed to the individual registration process. (This will be for the online journeys only.)

10.2 Better Metrics

Alongside and to support canvass reform, we are looking to improve the data available to EROs. EROs currently have access to a select range of management information (MI) in their Electoral Management Software (EMS) systems. The Better Metrics project represents an opportunity to explore the benefit to EROs of developing, enhancing and focussing MI reporting functionality so that it is easy to access, clear and reliable. This, in turn, will assist EROs to assess the outcomes they are achieving for their electoral registers and their targeting of resources to maximise their use.

Additionally, the Electoral Commission has an ongoing need for high quality data from EROs to underpin their work in supporting and challenging the work of EROs against the performance standards framework.

This project represents an opportunity to reach a solution that delivers key metrics that:

- produce a set of agreed core electoral data, which could easily be run from any EMS system, in a repeatable way, at various points of the year.
- is responsive to an anticipated environment where EROs have greater discretion over how they conduct the annual canvass and maintain their registers.

Question 18

Is there any further feedback you would like to provide in relation to the proposed new model for the annual canvass, that has not already been covered in another question?

Annex 1 - Summary of the 2016 & 2017 pilots

In 2016 and 2017, electoral administrators from twenty-four Local Authorities and Valuation Joint Boards (VJBs), working alongside their Electoral Management Software (EMS) suppliers and the Cabinet Office's Modern Electoral Registration Programme, delivered pilots to test whether or not alternatives to the legislated annual canvass exist that are more efficient and at least as effective.

Four alternative canvassing models were tested using randomised controlled trials: the Household Notification Letter (HNL) model, the email model, the telephone model and the discernment model. The HNL model issued a HNL (household notification letter) that listed the details of everyone registered to vote in a household, and only required a response if there had been a change to the details listed. The email and telephone models piloted different ways of contacting households. Under the email model, if an email address was held for a household they would be contacted twice by email, once by post and then receive a household visit. Under the telephone model, if a telephone number was held for the household, a phone call would replace the household visit stage of the canvass. Under these models, if an email address or telephone number was not held, the household followed a more typical canvass process of two contacts by post and a household visit.

The Discernment model also issued a HNL by post. However, the key difference here was that the ERO would only issue a HNL if the individuals in the household could be matched using local data; the ERO could therefore be more confident there had been no change to the details listed. Households that couldn't be matched using local data followed the same process as under the email model, where they were contacted by email (if an email was held), by post and finally with a household visit.

Each LA or VJB completed the usual legislated canvass in their control group and their chosen alternative canvass model in their intervention group. By comparing the results of two approaches, delivered at the same time and in the same area, we can show that the difference in outcomes was driven by the alternative approach tested. Through our analysis we found that while each model was successfully implemented, only the telephone and email canvass models were as effective as the legislated canvass at a lower cost. On average the telephone model cost 30% less than the usual canvass and the email model cost an average 22% less.

The HNL and discernment models made larger savings of 65% and 37% respectively but were not as effective as the legislated canvass. This can be largely attributed to the HNL being less effective in capturing the same volume of information as the usual canvass, and the quality of the data that routed households to the HNL as part of the discernment model.

However, while the discernment model as tested was not as effective as the usual canvass we found there were benefits to the processes it introduced. For example we found that, while the quality of data could be improved, using data was effective in targeting households that did not need to report a change in household composition. With 57% to 83% of households across the pilot sites reporting that there had been no change to their household composition. A data driven approach that targets resources appears both an effective

process and cost saving solution. Equally, through the email and discernment models, we found that using emails alongside one posted HEF and a household visit was just as effective as the legislated canvass and less expensive.

While the legislated canvass implemented in each control group was used to assess each alternative model, EROs also emphasised their reservations about returning to the legislated canvass approach. A collective belief that the usual process is costly and repetitive reiterates clear support for modernisation attempts - and the canvass pilots' evaluation process has set a robust evidence-base to inform this.



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