

Committee(s): Policy and Resources	Date(s): 13 December 2018
Subject: Electoral Registration – Annual Canvass Reform	Public
Report of: Town Clerk	For Decision
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Summary

The Cabinet Office is currently consulting on proposals to reform the annual canvass for the Electoral Register. This is a nationwide proposal which aims to make the canvass more effective and efficient. The Cabinet Office is proposing that a new data matching stage is brought into the process where Government data is used to identify if there is a change in a household or not. Under the proposals, each household will receive a communication which will vary depending on whether voters' details have been confirmed through data matching. In certain circumstances, residents will not be required to confirm their details if they are verified with Government data.

The residential canvass in the City is unique. Under the current arrangements, residents are sent two forms: a Household Enquiry Form (HEF), used to update the Electoral Register for Parliamentary and Greater London Authority (GLA) elections, and a Form A, which is used to update the City of London Ward Lists. Under the Cabinet Office proposals there is concern that, potentially, it could cause confusion amongst residents if their details are confirmed for the Electoral Register, as the proposed communication the City Corporation would be required to send following verification implies that no further action will be required. However, City residents will still receive Form A from the City Corporation asking them to complete and return the form in order to update the Ward Lists. Not all residents will understand that there are two separate lists, the Electoral Register and the Ward Lists. The accuracy of the Ward Lists could decrease in residential areas as a result.

For clarity, this does not affect business voters and the method by which they are canvassed.

Recommendation

Members are asked to agree the City's response to the consultation as drafted in paragraph 11, subject to any changes which might be required following a meeting between officers and the Cabinet Office.

Main Report

Background

1. Each year the Electoral Registration Officer (ERO) sends a HEF to each residential address. This form is used to identify residents who are eligible to vote. A response is required from each household, regardless of whether there have been any changes or not. If a response is not received, the ERO is required to send two further forms and employ a canvasser to visit the property. This process is stipulated in the Representation of the People (England and Wales) Regulations 2001 (as amended).
2. The City of London operates this system to update the Electoral Register which is used for Parliamentary and GLA elections. The City also operates a similar process to update the City of London Ward Lists. This involves Form A being sent to each residential property. Where a response is not received to the initial form, two reminders are sent, and a canvasser visits the property. This is in accordance with the City of London (Various Powers) Act 1957 (as amended) which states that the Town Clerk “shall have a house to house or other sufficient inquiry made as to the persons entitled to vote as electors at a ward election.”
3. Both residential canvasses run parallel to each other. This avoids confusion for residents and makes for a more efficient process. An example of this is that canvassers visit households to request residents complete both the HEF and the Form A at the same time.

Current Position

4. The Cabinet Office is seeking to reform the Electoral Register annual canvass across all local authorities. The Cabinet Office has identified the following issues with the current canvass process used nationally:
 - a. It is highly prescriptive and paper based
 - b. Every property must respond whether or not they have a change to report
 - c. It is a resource intensive process (particularly following the change to Individual Electoral Registration (IER) in 2014).
 - d. Citizens find it confusing that they must register individually after returning a HEF and that the HEF is not a registration form
 - e. The changing nature of how citizens engage with registering to vote.
5. Under the proposals a new “data discernment step” would be introduced. This involves the Electoral Register being matched with data held by the Department of Work and Pensions (DWP). If a household of voters matches with DWP data, that house is confirmed, and they are advised accordingly by the ERO either by letter or an email. A resident may be required to confirm there are no changes. If a household does not match, the usual process applies with the ERO being required to send a HEF to the household and make two further contacts if there is no response to the HEF.
6. The Cabinet Office have tried to ensure that the new system:
 - a. enhances the citizen experience

- b. is streamlined, lower cost and financially sustainable
 - c. is less prescriptive
 - d. is trusted and secure, with increased resistance to fraud
 - e. maintains the completeness and accuracy of the register
 - f. includes the capacity for innovation and improvement, adaptable to future change
7. There are some benefits for residents in the City using the proposed new method. For example, the proposals allow increased use of electronic communication. They also allow for canvassing via telephone which would assist in reaching premises with high levels of security and it would eliminate canvasser visits to short term let properties, which they are currently required to visit.
8. However, as the canvass for the Ward Lists runs parallel to the Electoral Register canvass, there is a risk that the process described in the proposals would create confusion for electors. For example, whilst a resident's details may match with government data, the proposed communication the City Corporation would be required to send as confirmation implies that no further action will be required for the Electoral Register. However, they would still be required to complete a Form A to ensure their details remain on the Ward List. Not all residents will understand that there are two separate lists. There is risk of creating confusion by sending two communications to a resident, one which requires action and one which does not. The proposal could also result in an increased number of properties to canvass and a reduction in the accuracy of the Ward List in residential areas.
9. In order to inform the response to the Cabinet Office's consultation the City Corporation will need to consider whether it should either:
- a. Note the introduction of data discernment stage and continue to conduct the canvass in the same manner as it does now (whilst leaving it open for the City Corporation to consider participating in the future);
- or
- b. use information obtained in the data discernment stage (if undertaken) to assist with the Ward List residential canvass (which would allow the City to undertake a similar process for the Ward List as the Electoral Register nationally).
10. It should be noted that the Comptroller and City Solicitor and the Electoral Services Manager are due to attend a meeting with the Cabinet Office on Monday 10 December to discuss initial concerns prior to the meeting of the Policy and Resources Committee. The two options mentioned above will be raised as part of this and Members will be updated on the outcome of discussions verbally at the Committee meeting.

Proposed Response

11. Subject to the outcome of deliberations with the Cabinet Office to consider the submission of a response as drafted below:

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? NO

The City of London is unique in the system used for Electoral Registration. The Electoral Register is produced on 1 December each year and City of London Ward Lists, used for local elections for Alderman and Common Councilmen in the City, are produced in February each year. During the annual canvass, two forms are sent to residents: a HEF (for electoral registration) and a Form A. The Form A is similar to a HEF as it lists current registered voters. It is used as a registration form to update the City of London Ward Lists.

Whilst the City Corporation recognises the importance of using data to effectively and efficiently administer electoral registration nationally and that there could be significant benefits for EROs across the country, the City Corporation feels that it should be optional for it to participate in the national data matching process in recognition of the unique circumstances within the City.

Under the proposals, some households in the City could be processed under route 1. They would receive a communication to say that no further action is required if the information on the Electoral Register listed is correct. They would also receive a Form A which they must respond to in order to ensure they are registered on the City of London Ward Lists. There is a significant likelihood for confusion amongst residents in the City in these circumstances. There is a risk that if residents are told that no further action is required for the Electoral Register, they will believe this also applies to the Form A and fail to respond to it, with the accuracy of the City's Ward Lists diminishing as a result.

To be clear, the City Corporation is not arguing for an exemption from the data matching process, but for it to be optional. It may be that the information obtained during the data matching process can be used to assist in the updating of the City of London Ward Lists, subject to the legality of this being confirmed.

Corporate & Strategic Implications

12. There are no corporate or strategic implications to responding to this consultation.

Implications

13. There are no other implications to responding to this consultation.

Conclusion

14. It is important that residents in the City of London have a clear method of registering to vote on the Ward Lists and the Electoral Register. The canvass must aid this and lead to the production of an accurate Ward List and Electoral Register. There may be benefits for residents in the City to the Cabinet Office's proposals, but they must be weighed carefully with the unique circumstances of voter registration in the City.

Appendices

None

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