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Llywodraeth Cymru
Welsh Government

Welsh Government
Consultation – summary of response

Canvass Reform Consultation - Welsh Response

Welsh Government, UK Government and Scottish Government Joint
Canvass Reform Consultation - Welsh Response Summary

March 2019

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Welsh Government, UK Government and Scottish Government Joint Consultation on Canvass Reform – Welsh Response Summary

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Section1: Consultation Response Overview

The Welsh Government, Scottish Government and UK Government jointly requested views on proposed reforms to the Annual Canvass for elections via a joint consultation.

Consultation responses will aid in modernising the annual canvass in Wales, England and Scotland. Whilst each Government is free to set our own priorities and policies, minimising divergence in electoral registration legislation and practice will be considered in order to avoid unnecessary confusion, burdens and costs and to secure the highest standards.

A total of 18 specific questions were set out in the consultation which generated 83 responses across the UK.

This document details a summary of Welsh responses to the consultation and contains a next steps statement. Section 2 is the next steps statement with Section 3 containing full copies of the question responses of those who indicated they were content for them to be published.

Whilst the consultation was open to all of the UK, only six identifiable Welsh responses were received.

Five respondents wished for their name and that of their organisations to remain anonymous. One respondent did not want their response to be published.

The Welsh responses received were from Public Sector organisations, a Private Sector organisation and an Individual.

Overall there was strong support for the proposals contained in the document. Common key themes identified from the responses include;

- Support for mandatory data matching, with local data matching being conducted at the ERO's discretion.
- The single occupancy tick box on registration application forms causes confusion
- Any property with a red elector must be converted into a red property
- Empty and void properties should be sent through the data matching process
- To exclude mandatory follow up activity with households sent through Route 1

The consultation questions and an example of the responses are listed below. Section 3 has the full responses.

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.

- Agree that additional local data matching should be at the ERO discretion.
- Data matching will allow the ERO to simply confirm households' details without requiring a response.
- We believe that all EROs should undertake national data matching based on the results achieved during the IER confirmation process.

Question 2: We are proposing that any property with a red elector must be converted into a red property. A property will only be green if 100% of electors in the property are individually green. Do you agree this is the right approach?

- Any property which flags a red data match should be investigated further and continue down a more comprehensive HEF process in order to identify potential deletions or changes to the register.
- In order to ensure an accurate register any properties with a red elector should require a response.

Question 3: Do you think a minimum standard for the accuracy of locally held datasets should be mandated?

- To produce an up to date register all data used for registration purposes should be highly accurate, lowering standards of accuracy may result in discrepancies on the register of electors.
- This would ensure consistency and without those checks and balance the integrity and accuracy of register would be at risk.
- It should be a matter for the ERO to determine if a local dataset is of a sufficient standard. Although national guidance would be useful.

Question 4: Do you agree that Empty and Void properties should be sent through the data matching process?

- A significant number of empty/void properties can often be matched with local data such as council tax as the different unoccupied exemptions and discounts are often reviewed annually with council tax departments so prove to be an accurate reflection of the property's circumstances.
- Whilst it will not be possible for empty and void properties to be included in national data matching, we believe local data matching should be used.

Question 5: Do you agree that recent applications to register should be exempted from the data step and automatically marked as green?

- Electors are often confused when receiving both a HEF and ITR so if recent ITRs can be taken into consideration before commencing the HEF process this should reduce elector confusion.
- Recent applications on the electoral register will have gone through a verification process with DWP and confirmation letters sent out to confirm residency at the property.
- Yes. We believe that in many cases EROs are registering electors when they first move into a new property thanks to collaborative working with other services at their local authority. As a result, it is likely that they hold accurate information that would not be matched with national or local data.

Question 6: Do you agree with no longer including a single occupancy tick box on registration application forms?

- The introduction of the single occupancy tick box has caused a significant amount of confusion.
- We have evidence that householders have ticked this box in error.
- There are significant issues with electors ticking the sole occupancy box incorrectly. It should be removed.

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?

- In the modern era electors should be able to communicate by their chosen method. Perhaps this should also include contact by text message.
- We believe the electorate are expecting electronic communication as the norm, they especially expect us to use it as a more efficient and cheaper form of communication.
- Although e-mail addresses can be useful for individuals, correspondence at household level shouldn't be e-mailed as this may not reach the most appropriate person for completion.

Question 8: Do you agree with the proposed process for the Route 1?

- Agree that this is the sensible way forward but it must be made clear that new electors, particularly relevant young attainners need to register.
- Electors cannot understand the necessity to confirm their details each year and allowing them to be contacted without needing to respond is a step forward.

Question 9: Do you agree with the proposal to exclude mandatory follow up activity (household visits, etc.) with households sent through Route 1?

- Route 1 still provides for an opportunity to capture new electors and/or potential changes so no further follow up activity should be required. This can be greatly supported by regular local data matching all year round to ensure the register is as up to date as possible when the canvass process commences.
- Yes as the better use of data allows for a more cost effective solution to ensuring an accurate canvass.
- The entire premise of canvass reform is to make better use of data enabling the citizen to not need to respond to communications when there is no change in the composition of their household.

Question 10: Do you agree with the proposed process for Route 2?

- Route 2 provides for greater flexibility in obtaining the information for non-responders.
- We believe Route 2 is the right approach to take, given the only properties sent via route 2 are those who the ERO genuinely believes has had a change in composition.
- We agree that those householders not able to match are sent down this route but disagree with up to three contacts. We believe that two contacts is sufficient – the second being a personal contact.

Question 11: Do you agree that a personal contact (door knock or telephone call) should be a mandatory element of the revised canvass?

- The personal visit by canvassers allows the ERO to assist many electors who may have difficulty registering and is known to increase response.
- There is significant evidence of the positive impact personal contact has on canvass responses. We are pleased that telephone contact has been included and would suggest that being able to also use email should be considered.

- Certain areas are difficult to canvass or deemed as unsafe, hence it should be to the discretion of the ERO.

Question 12: Are there property types in addition to those detailed above that you believe should be directed to Route 3?

- Consideration could also be given to sheltered accommodation properties with warden officers on site. Caravan sites, boat homes and nurses accommodation at hospitals can also be difficult to canvass in a traditional manner and may benefit from Route 3.
- Refuge Centres, Service Barracks
- We believe that the following should be considered: mobile home sites, hospital staff accommodation, armed services personnel barracks, and marinas

Question 13: Do you believe this is the correct process to deal with these properties?

- The process outlined is correct for these properties, however, the data provided needs to be in a useable format for the ERO.
- Although we agree with the process Welsh administrators often find that there is very limited response from ITRs sent to Houses of Multiple Occupation (for example care home or student halls of residence). Until there are changes to the legislation to reform/streamline the follow-up work needed with ITRs issues will persist. An opportunity might exist to consider alternative methods and we fully support the provision of the Route 3 option.

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, contingency measures such as route 2 need to be in place to still obtain the relevant HEF information for all properties.
- If the ERO is not able to access the required information then the property should go down route 2.
- We would fully support and encourage UK/Welsh/Scottish Governments to pursue their suggestion 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.

Question 15: Do you agree with the proposal that pending/potential electors should be included in the data matching and canvass communication? -

Comments, if No

- There needs to be a distinction between registered electors and those who may be potential electors otherwise electors may become confused.
- Pending/potential electors are not registered electors and we fear that including them on any communication would mean the clarity of the communication would be compromised.
- Canvass reform is an opportunity to look at pending/potential electors in more detail with statutory provision being made for pending/potential electors to be deleted at the ERO's discretion once all statutory steps have been taken. We would also seek for there to be guidance to assist EROs in this decision.

Question 15: Do you agree with the proposal that pending/potential electors should be included in the data matching and canvass communication? - if Yes, do you think there are any risks in doing so?

- Not including pending/potential new electors does cause confusion as residents often say they've completed a form to register but this is reflected in the information presented to them on the HEF. Showing up to date information on pending/potential electors on the HEF provides a more accurate reflection of the data held by EROs. Showing both registered electors and other data held will also help with duplicates. Consideration should be given to the wording used next to pending/potential electors on the HEF in order to prevent confusion and ensure the assumption is not made that they are registered electors.

Question 16: What do you think the issues with the current HEF are?

- In Wales two A3 forms are provided, one in English, the second in Welsh, this causes a significant amount of additional cost to produce and only one form is returned so the second language preference form is disregarded.
- Lack of understanding by householders as to why they should then receive an ITR when in their eyes they have already told you that they are there. The online HEF process allows you to do the whole registration- why cannot this be done on the paper version?
- We believe that having a separate Welsh and English language HEFs is difficult to manage and expensive to administer.
- The size of the form puts people off from even looking at the form because they think there is more required of them than actually is - is too daunting. Here in Wales, they have 2 forms, so they are confronted with even more paper. Previous canvass forms were able to have Welsh one side, English the other.

Question 17: Is there information that can be taken out of the HEF?

- Section 2 is often completed with additional electors (rather than section 3) therefore section 2/3 could be combined.
- The question of postal/proxy should be amended to just postal. You can only have a permanent proxy due to certain conditions, hence this should be excluded.
- I think it just needs redesigning - electors are constantly filling in the new electors even though their names already appear or new electors fill their names twice, just allow lines under the pre-printed.
- Postal vote information at the end of the HEF doesn't need to be included as it will be included on the ITR. Reduce the wording on page 1 (letter). Word optional should be reconsidered regarding contact details.

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?

- National data matching is reliant on the national data being accurate and this should be monitored by the Cabinet Office for regular accuracy and that their records are maintained and up to date. Local data matching is reliant on the relevant department being up to date and accurate; reviews should be undertaken to establish if the data source is current.

- The work to modernise the canvass process is welcome. It needs to consider Welsh Language requirements when proposing changes to forms. The provision to carry out a 'full' canvass if the ERO believes it is required should be included.
- We believe that to ensure smooth transition to the new canvass processes it was absolutely crucial to ensure adequate Electoral Management software functionality and workflow management was properly tested and in place within the scheduled project planning period prior to any 'go live' date.

Section 2: The Next Steps

As the power over Welsh elections is devolved, it is for Welsh Ministers to make the decisions on when to introduce legislation which will give effect to canvass reform.

The Welsh Government, UK Government and Scottish Government continue to work jointly on Canvass Reform and whilst each Government is free to set our own priorities and policies there is also a desire to minimise divergence in electoral registration legislation and practice across the UK.

The consultation responses will be used to inform any legislation which will provide reforms to the canvass.

The analysis of the proposed reforms within the consultation has identified support from Welsh responses and will allow Electoral Registration Officers (EROs) to contribute to shaping the canvass to activities which best suit their local circumstances.

We would like to thank everyone who has taken the time to respond to the consultation. Your views were important in informing the decisions on canvass reform.

Section 3: The Welsh Responses

Submitted to **Proposals for reform of the annual canvass**

Submitted on **2018-12-01 12:08:11**

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

If No, please explain your reasoning: We believe that all EROs should undertake national data matching based on the results achieved during the IER confirmation process. Whilst accepting the match rate changes significantly across the country, we feel that the DWP is a good data source and should be used by all EROs. We also welcome the ability for EROs to decide whether local data matching is useful in their area and which data sources will be of value. We would encourage the Government to help EROs in exploring what data sources, in addition to those they currently use, might be available and how to work with partners to enable them to access this information in a usable format.

2 We are proposing that any property with a red elector must be converted into a red property. A property will only be green if 100% of electors in the property are individually green. Do you agree this is the right approach?

Yes

If No, please explain your reasoning: The basis of canvass reform is that data will be used to assure the ERO that all registered electors are still present at a property. We cannot support any system whereby communications that do not require a response are sent to a household where the ERO is not satisfied that all residents are still eligible for inclusion on the register.

3 Do you think a minimum standard for the accuracy of locally held datasets should be mandated?

Yes

Please explain your reasoning: Without setting a minimum standard for locally held data there is a significant risk to the integrity of the electoral register. It is imperative that EROs understand the data they have access to and its currency and accuracy as well as any limitations. The AEA is concerned that at present many EROs may use datasets without sufficiently understanding their accuracy. Any assistance that can be given in helping them to ensure the data they are using is of a sufficient standard would be welcomed. There must also be clear guidance on how to interpret the accuracy threshold and how EROs ensure they can test this on an ongoing basis. We would support guidance regarding the accuracy threshold, but would not support a mandated level.

4 Do you agree that Empty and Void properties should be sent through the data matching process?

Yes

Please explain your reasoning: Whilst it will not be possible for empty and void properties to be included in national data matching, we believe local data matching should be used. There are EROs with static populations of ineligible electors, for example American military bases, who would benefit from using local data sources, as will those with high proportions of second/holiday homes. We would also suggest that thought is given in guidance as to whether there is merit in recommending EROs data match empty and void properties at more than one point in the canvass, and potentially as a separate exercise ahead of elections. Whilst this isn't necessary for all types of void

and empty property, there is merit in the ERO considering the potential benefits of such activity.

5 Do you agree that recent applications to register should be exempted from the data step and automatically marked as green?

Yes

If Yes, what time period you think should be defined as “recent” (1 months, 2 months, linked to the last monthly update? Please explain: Yes. We believe that in many cases EROs are registering electors when they first move into a new property thanks to collaborative working with other services at their local authority. As a result, it is likely that they hold accurate information that would not be matched with national or local data. There needs to be a mechanism in place for these citizens that ensures they are not inconvenienced by needing to make a response when the ERO is confident the information they hold is up to date and accurate. We believe EROs should have discretion in this area, they know their electorate best and are likely to want flexibility depending upon how static their population is. We would suggest however that the time period is not more than two months. We would also suggest that the period set relates to the notice of alteration they appear on rather than individual application or determination dates.

If No, please explain your reasoning:

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

Yes

Please explain your reasoning: The administrators we have spoken to confirm that, despite revised wording, there are still a significant number of applicants ticking this box when it does not apply. This is causing a lot of work and expense without sufficient offset benefits. However, we support further consideration relating to asking applicants who else is resident in the property. Collecting qualitative information would help EROs ensure that all residents who are eligible are invited to register. We would like to see further work done to see how practical this would be in terms of EMS functionality and ensuring this information could be processed in a straightforward way. As part of this work, we also believe serious thought should be given to the merits in allowing EROs to hold details of those ineligible to register due to their nationality. Without this there is the potential for ineligible electors to be asked on more than one occasion to register.

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

If No, please explain your reasoning: We appreciate that this is an area where there are many differing opinions, but on balance we believe that route one households should be able to respond to an e-communication before a paper contact is made. Our opinion is based on what we perceive to be the way citizens wish to communicate and the additional benefits this approach brings. Whilst accepting the e-communication does not mean that the household has been contacted – i.e. by a letter through the door, the communication will be to someone who the ERO is confident is still resident. If the fundamental principle of canvass reform is accepted – i.e. electors’ information is confirmed by accurate data matching, then contacting the elector personally should not undermine the process. We also think it gives additional benefits whereby if an elector has been incorrectly confirmed it is letting them know that they are still registered at a previous address so they can take steps to be removed. There are also potential cost savings to be found, although we know at present some commercial suppliers are

charging more than the likely cost of a posted communication. There would be merit in the Government looking at e-communication charges and where alternatives could be used. Across all aspects of canvass reform though we would stress the need for all communications to be carefully considered and thoroughly tested. It is imperative that the citizen is confident of the origin of the e-communication and understands the actions they need to take. Consideration will also need to be given as to whether all electors with necessary contact details are communicated with or whether it is a limited number within a property. Also, we do not believe those under the age of 18 should be approached. Finally, we feel that email should be extended to include other e-communication options available to EROs, such as text message or a Council app.

8 Do you agree with the proposed process for the Route 1?

Yes

Please explain why: We believe that using data to deliver a better experience for citizens is the right approach to take. Electors cannot understand the necessity to confirm their details each year and allowing them to be contacted without needing to respond is a step forward. It will also deliver much needed cost savings to local authorities.

We would again stress the importance of the wording on the communication to ensure that citizens understand what actions, if any, they have to take. In particular we have concerns regarding ensuring changes that need to be made, such as electors becoming 76, reaching voting age or identifying other residents having moved in, are clearly outlined.

Also, we believe it is in the interests of the citizen and local authority that channel shift away from paper responses is enabled as far as possible. EROs should be encouraged to make use of these channels rather than require paper replies.

To encourage channel shift and in the spirit of cost savings, there should be no statutory requirement to include a pre-paid return envelope for any paper communication. Savings will be made on paper, printing, postage and office processing time.

9 Do you agree with the proposal to exclude mandatory follow up activity (household visits, etc.) with households sent through Route 1?

Yes

Please explain why:

The entire premise of canvass reform is to make better use of data enabling the citizen to not need to respond to communications when there is no change in the composition of their household. It would be a backwards step to require any ERO to conduct follow up activity. Also, assuming e-communications are permitted, several households will receive two different types of contact giving them an additional opportunity to consider the information they are sent.

10 Do you agree with the proposed process for Route 2?

Yes

Please explain why. : We believe Route 2 is the right approach to take given the only properties sent via route 2 are those who the ERO genuinely believes has had a change in composition. In addition, it is essential that the prosecution sanctions for the non-return of the HEF and ITR that are available now to ERO's are still available in the future, if not improved under canvass reform.

11 Do you agree that a personal contact (door knock or telephone call) should be a mandatory element of the revised canvass?

No

Please explain why: Whilst we note that the positive impact personal contact has on the canvass, it is our view that if we are to fully reform the canvass process then the use of

personal canvassing should cease. This will save considerable costs in managing and administering canvassers both nationally and locally. It also puts more of an onus onto the ERO as to ensuring citizens are canvassed which does not meet with the spirit of individual electoral registration. The onus now lies with the individual.

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.: We believe that the following should be considered: mobile home sites, hospital staff accommodation, armed services personnel barracks, and marinas, supported housing schemes – Warden control

13 Do you believe this is the correct process to deal with these properties?

Yes

If No, can you suggest an alternative approach?: The process outlined is correct for these properties, however, the data provided needs to be in a useable format for the ERO. Whilst the AEA supports the designation of a responsible officer with a duty to supply the information to the ERO, consideration needs to be given to the requirements in other areas, for example caravan parks. Greater clarity is required in legislation for individuals to provide information where they have no official designation. In addition, the introduction of responsible officers at a university could mean 20 different officers if there are 20 halls of residence. Whereas the university data controller would mean just one officer for the ERO to speak with. We would also ask that clarity is given as to whether the list from a responsible officer can be used as one form of evidence if someone who is on the register of electors is not on the list.

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

Please explain your reasoning: As per AEA (Wales) response - If the ERO is not able to access the required information then there is no option other than to send the property down Route 2. We firmly believe, however, that further assistance should be given to ERO's in helping them to access information from institutions, especially military barracks and students. If at a HMO there has been no response via Route 3 process then they are very unlikely to respond via Route 2 which could result in a lengthier more expensive way to get a response. We would fully support and encourage the UK/Welsh/Scottish Governments to pursue their suggestion to place an explicit duty in legislation on responsible officers at identifiable property types to provide ERO's with this information when asked to do so, consistent with data protection.

15 Do you agree with the proposal that pending/potential electors should be included in the data matching and canvass communication?

No

If No, please explain why: Pending/potential electors are not registered electors and we fear that including them on any communication would mean the clarity of the communication would be compromised. Some ERO's keep pending/potential electors on their software whilst others remove them at periodic intervals or at a certain point, for example prior to the annual canvass. Canvass reform is an opportunity to look at pending/potential electors in more detail with statutory provision being made for pending/potential electors to be deleted at the ERO's discretion once all statutory steps have been taken. We would also seek for there to be guidance to assist EROs in this decision. Not Answered

Please explain what these are:

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

Comments: Elector confusion – people believe they are registered after completing their details on a HEF not realising this is the first part of a two-stage process with them then having to complete an ITR to register. Size – too large and too much information. Currently A3, however A4 is an easier size to manage for the personal canvass and for the person completing the form, not to mention ERO processing. There are two designs for the HEF – pre-populated and blank. We are aware of some EROs only using the one template for populated and not populated. Consideration should be given to whether it is possible for there to be just one design.

There is too much information on page 1 and evidence that residents are not reading the accompanying letter. AEA (Wales) supports the AEA draft consultation response. However, branch members commented that having a separate Welsh and English language HEFs is difficult to manage and expensive to administer. Careful consideration should be made to simplifying the current HEF design, in Wales, with separate languages on each face and back-to-back, i.e., English form with notes on reverse side and a Welsh form with notes on reverse side.

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

Comments: The number of lines available for names to be added could be reduced. Pre-populated HEF doesn't need to include postal voting arrangements Blank HEF doesn't need to include the opt out details. Postal vote information at the end of the HEF doesn't need to be included as it will be included on the ITR. Reduce the wording on page 1 (letter). Word optional should be reconsidered regarding contact details. We would advise that consideration is given to how the register to vote website has been changed to encourage citizens to provide contact details. AEA (Wales) supports the AEA draft consultation response. In addition, Members commented that they often found that electors tended to complete the HEF. 'Section 2' with additional electors rather than 'Section 3' and as such there could be potential to combine these sections.

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?

Comments: We welcome the Government's work to revise the current annual canvass process and deliver benefits to both citizens and local authorities. Whilst supporting the proposals, there are some areas worthy of further consideration. UPRNs We understand that the national data match will be based on UPRN's only and will not use both the UPRN and address string to match as was the case for the introduction of IER. As a result, the Cabinet Office will need to send appropriate early messaging to EROs to ensure they have UPRNs against all of their properties. We are aware that some EROs do not have full coverage and making it clear the necessity for the UPRNs to be in place is imperative for successful canvass reform is of clear importance. Skillsets within Local Authorities and Electoral Management Software At present some EROs are not able to carry out local data matching due to the lack of software functionality, skills, resources or availability of data. The Cabinet Office will need to provide support, guidance and funding to EROs to enable them to successfully conduct local data matching. We would also urge the Government to liaise with key stakeholders who maintain databases, such as Council Tax records, to enable reports to be written that can be automatically loaded into EMS systems without individual local authorities having to speak to their suppliers on a case by case basis. Streamlining the HEF process Whilst we support the ability for the citizen completing the HEF to also register in one seamless process, the wording on the communication would need to consider that if they do not have their NINO to hand they can still complete the HEF and then complete their registration at a later stage. Otherwise we fear the completion of HEF may be reduced. EMS Suppliers. Canvass

reform will be reliant on EMS suppliers and we have concerns as to ensuring they have sufficient time to develop the functionality and ensure adequate user testing. As with the introduction of IER, the financial cost of re-developing software systems to meet legislated procedural changes to the administration of electoral registration should be met by central government. ERO's should not have this financial burden placed upon them. Likewise, the re-development of software systems should be incorporated into their main programming and not as an add-on to existing systems. National Data Matching Whilst we are pleased to learn there will be less restrictions on EROs sending their data to the DWP than there were when IER was introduced, we would welcome further details on the process and the timescales that EROs will have to work within. ERO flexibility Consideration should also be given to allow for the ERO's discretion whether to conduct a full canvass at any stage, permitting ERO's to do what they feel is necessary in light of prevailing local circumstances. Extension of rolling registration We believe that the months of rolling registration be extended to the months of October and November. This would be in the interests of the elector and administrator. Electoral Reform in Wales It must be noted that the administration of the canvass incorporating extension of the franchise to 16 year olds in Wales will take place also in 2020. The next Welsh Government elections take place in 2021. We are concerned that changes to canvass reform could impact on the registration rate not only for the overall electorate in Wales but also for those registering to vote for the first time. The Cabinet Office and Welsh Government need to ensure such changes do not affect the 2021 poll and that the registration process be fully resourced both financially and practically. We had thought that canvass reform in Wales could be delayed for a twelve month period but then this would run into the possible full out local government elections in Wales when the above concerns would arise once more.

Other comments

In addition, we have highlighted below a couple of recommendations from our 2017 post-election report "It's time for urgent and positive Government action – The AEA's review of the 2017 local government elections and the UK Parliamentary general election" that could be considered as part of the canvass reform project.

In the case of recommendation 2017-15 this would assist canvass reform with the provision of email addresses: Recommendation 2017 – 14 As part of its immediate work programme, Cabinet Office should include workstreams that will: Deliver an effective resolution to the ongoing issue of duplicate registrations; Develop and extract management information from electoral management software systems that will be of assistance to EROs in the management of their electoral registers; Reduce bureaucracy in registration processes, both during and outside of canvass periods; Enable the better sharing of data in order to simplify registration processes; Deliver an effective solution to the registration of individuals in establishments such as universities, colleges, residential care homes and houses in multiple occupation. The Cabinet Office should also set out a clear timetable of when each of these issues will be considered. Recommendation 2017 – 15 The provision of an email address should be made mandatory for all applications to register to vote made through the digital service.

Submitted to **Proposals for reform of the annual canvass**

Submitted on **2018-11-28 12:55:38**

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

If No, please explain your reasoning: Datamatching will allow the ERO to simply confirm a households details without requiring a response. This must be the way forward and will save both time and money in an era of ever increasing fiscal consciousness. We also welcome the ability for EROs to decide whether local data matching is useful in their area and which data sources will be of value. If a high match rate is achieved from the national data match it may not be cost effective to carry out a local exercise.

2 We are proposing that any property with a red elector must be converted into a red property. A property will only be green if 100% of electors in the property are individually green. Do you agree this is the right approach?

Yes

If No, please explain your reasoning: In order to ensure an accurate register any properties with a red elector should require a response.

3 Do you think a minimum standard for the accuracy of locally held datasets should be mandated?

No

Please explain your reasoning: It should be a matter for the ERO to determine if a local dataset is of a sufficient standard. Although national guidance would be useful.

4 Do you agree that Empty and Void properties should be sent through the data matching process?

Yes

Please explain your reasoning: There is little point in trying to canvass properties that are known to be long term empty. However, perhaps a second match should be carried out later in the canvass period to ensure the properties remain empty.

5 Do you agree that recent applications to register should be exempted from the data step and automatically marked as green?

Yes

If Yes, what time period you think should be defined as "recent" (1 months, 2 months, linked to the last monthly update?

Please explain: If electors have just moved in to a property (and the previous occupants deleted) then the property can be considered to be up to date. To contact them again would just be confusing.

This should be a matter for each ERO as they will have the necessary local knowledge about the mobility of their population. Perhaps a maximum of 3 months would be suitable.

If No, please explain your reasoning:

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

Yes

Please explain your reasoning: There are significant issues with electors ticking the sole occupancy box incorrectly. It should be removed. Perhaps an ITR should ask for the names of all other residents at the property.

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

If No, please explain your reasoning: In the modern era electors should be able to communicate by their chosen method. Perhaps this should also include contact by text message.

8 Do you agree with the proposed process for the Route 1?

Yes

Please explain why: Electors cannot understand the necessity to confirm their details each year and allowing them to be contacted without needing to respond is a step forward. It will also deliver much needed cost savings to local authorities. Communication by all means should be considered in addition to email (e.g. text, mobile app)

9 Do you agree with the proposal to exclude mandatory follow up activity (household visits, etc.) with households sent through Route 1?

Yes

Please explain why: Yes as the better use of data allows for a more cost effective solution to ensuring an accurate canvass.

10 Do you agree with the proposed process for Route 2?

Yes

Please explain why. : These are the properties where there is likely a change so a 'fuller' canvass is required.

11 Do you agree that a personal contact (door knock or telephone call) should be a mandatory element of the revised canvass?

Yes

Please explain why: The personal visit by canvassers allows the ERO to assist many electors who may have difficulty registering and is known to increase response.

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: Possibly although none that can be identified in this area. We believe that the following should be considered:

13 Do you believe this is the correct process to deal with these properties?

Yes

If No, can you suggest an alternative approach?: The process outlined is correct for these properties, however, the data provided needs to be in a useable format for the ERO.

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

Please explain your reasoning: If the ERO is not able to access the required information then the property should go down route 2.

15 Do you agree with the proposal that pending/potential electors should be included in the data matching and canvass communication?

No

If No, please explain why: There needs to be a distinction between registered electors and those who may be potential electors otherwise electors may become confused. Not

Answered

Please explain what these are:

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

Comments: The forms are too long and contain too much information. In Wales there are two A3 forms sent to each property. This is costly and difficult for both the elector and staff to process. A single bilingual form may be more simple and manageable if designed well. Electors complete the HEF and then believe they have registered. They do not realise this is a two stage process. This issue could be helped if a HEF and ITR looked less alike.

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

Comments: Section 2 and 3 could be joined and made smaller to allow electors to add electors in the same place they amend existing ones. The letter on page 1 is mostly unnecessary and the messages regarding the handling of data on last page could be separate from form. 'Optional' should be removed where electors are asked for email address.

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?

Comments: The work to modernise the canvass process is welcome. It needs to consider Welsh Language requirements when proposing changes to forms. The provision to carry out a 'full' canvass if the ERO believes it is required should be included.

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

If No, please explain your reasoning: Agree that additional local data matching should be at the ERO discretion. If a high percentage match is achieved through the national data matching exercise the ERO may feel that an additional local data match is unnecessary. Similarly if a low percentage data match is received from the national matching, the ERO may feel that it would be advantageous to supplement with additional local data matching to reduce the number of forms that would need to go through the full chasing route (route 2) and maximise the number going through route 1.

2 We are proposing that any property with a red elector must be converted into a red property. A property will only be green if 100% of electors in the property are individually green. Do you agree this is the right approach?

Yes

If No, please explain your reasoning:

3 Do you think a minimum standard for the accuracy of locally held datasets should be mandated?

Yes

Please explain your reasoning: There should be a minimum standard – all addresses should hold a UPRN and all postcodes checked.

4 Do you agree that Empty and Void properties should be sent through the data matching process?

Yes

Please explain your reasoning: If there is a definite match with Council Tax then the ERO should have discretion to return the status of the electoral form, hence saving money and time in sending a canvasser out to the property. Just carried out an exercise on the annual canvass 2018 out of 11,000 properties 3,500 were exact matches and hence it saved time and money in sending a canvasser out to these 3,500 properties. If properties are "green" and are therefore sent through route 1; should any electors subsequently move in, a form will still have been delivered to the property and theoretically be there for them to complete. In addition many EROs are already performing local data matching with data sources such as Council Tax and sending ITRs directly to new electors throughout the year.

5 Do you agree that recent applications to register should be exempted from the data step and automatically marked as green?

Yes

If Yes, what time period you think should be defined as "recent" (1 months, 2 months, linked to the last monthly update)? Please explain: Recent applications on the electoral register will have gone through a verification process with DWP and confirmation letters sent out to confirm residency at the property. In very recent additions the register data could very well be more up to date than DWP data. Therefore this idea does have some merit. We believe that "recent" should be defined as around the 1 month mark.

If No, please explain your reasoning:

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

Yes

Please explain your reasoning. : We have evidence that householders have ticked this box in error.

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

If No, please explain your reasoning: It is our duty to contribute to helping the environment, if the response is say less than 7,000 forms that can only be a positive. Online responses to canvass grow year on year. This option absolutely should be provided for residents who wish to and are used to performing a number of tasks online.

8 Do you agree with the proposed process for the Route 1?

Yes

Please explain why: Agree that this is the sensible way forward but it must be made clear that new electors, particularly relevant young attainees need to register. Email option should contain link straight to gov.uk site.

9 Do you agree with the proposal to exclude mandatory follow up activity (household visits, etc.) with households sent through Route 1?

Yes

Please explain why: EROs should be given the discretion to follow up in areas where there is more movement such as areas of multiple occupation, rental accommodation but choose

not to in more static areas.

10 Do you agree with the proposed process for Route 2?

No

Please explain why. : We agree that those householders not able to match are sent down this route but disagree with up to three contacts. We believe that two contacts is sufficient – the second being a personal contact.

11 Do you agree that a personal contact (door knock or telephone call) should be a mandatory element of the revised canvass?

No

Please explain why: Should be to the discretion of the ERO. Certain areas are difficult to canvass or deemed as unsafe, hence it should be to the discretion of the ERO whether they can recruit or deem it safe to send a canvasser out to those areas.

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: Refuge Centres, Service Barracks

13 Do you believe this is the correct process to deal with these properties?

Yes

If No, can you suggest an alternative approach?:

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?

No

Please explain your reasoning: IF the responsible person does not respond to route 3 then they are unlikely to respond to route 2. This is costly and time consuming.

15 Do you agree with the proposal that pending/potential electors should be included in the data matching and canvass communication?

No

If No, please explain why: A potential or pending elector is still not an elector and hence should not be included as this would lead to the householder assuming that they are

registered if they are listed on the communication. If we went down this route then the communication would have to be very clear and user tested. Not Answered

Please explain what these are:

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

Comments: Lack of understanding by householders as to why they should then receive a ITR when in their eyes they have already told you that they are there. The online HEF process allows you to do the whole registration- why cannot this be done on the paper version? Because we enclose a pre-paid envelope, householders assume that we require a response in writing, so they send the HEF back by post, hence less take up on responding by text, online or freephone. It is not clear that if there is no Change they must still respond to this form by law. A DOB field could be added for any 16/17yr olds (or 14/15 yr olds in Wales going forward). Every year we are sending out ITRs to electors who are 16 but do not turn 18 before the end of the next canvass year. These electors are able to go on line and register. However when they come back in to the system they are placed on hold to be invited after publication, during the next register year after 1st December. Many of these electors have passed the IERDs checks and you can end up with the farcical situation whereby someone makes a successful registration application on the 23rd November, are placed on hold and will be sent a new ITR a week later, after publication on the 1st December. With a DOB field on the HEF the ERO could ensure that ITRs are only sent to electors that will turn 18 before 30 November the following year.

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

Comments: The question of postal/proxy should be amended to just postal. You can only have a permanent proxy due to certain conditions, hence this should be excluded.

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?

Submitted to **Proposals for reform of the annual canvass**

Submitted on **2018-11-09 10:49:46**

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

If No, please explain your reasoning: As per IER (June 2014 confirmation live run) the national data matching process proved, in the main, to be successful for the majority of records held on the register of electors. Local data matching also proves beneficial; however it can be difficult for some local authorities to obtain access to local data and it's imperative the local authority has confidence in the local data source being up to date and accurate.

2 We are proposing that any property with a red elector must be converted into a red property. A property will only be green if 100% of electors in the property are individually green. Do you agree this is the right approach?

Yes

If No, please explain your reasoning: Any property which flags a red data match should be investigated further and continue down a more comprehensive HEF process in order to identify potential deletions or changes to the register.

3 Do you think a minimum standard for the accuracy of locally held datasets should be mandated?

Yes

Please explain your reasoning: To produce an up to date register all data used for registration purposes should be highly accurate, lowering standards of accuracy may result in discrepancies on the register of electors.

4 Do you agree that Empty and Void properties should be sent through the data matching process?

Yes

Please explain your reasoning: A significant number of empty/void properties can often be matched with local data such as council tax as the different unoccupied exemptions and discounts are often reviewed annually with council tax departments so prove to be an accurate reflection of the property's circumstances.

5 Do you agree that recent applications to register should be exempted from the data step and automatically marked as green?

Yes

If Yes, what time period you think should be defined as "recent" (1 months, 2 months, linked to the last monthly update)? Please explain: Electors are often confused when receiving both a HEF and ITR so if recent ITRs can be taken into consideration before commencing the HEF process this should reduce elector confusion. Some areas have a higher level of churn than others and therefore 'recent' should be kept to a minimum of six weeks. Consideration should be taken with regards to if this rule starts from the application date, processed date or monthly update. Application date would be more appropriate as depending on this the monthly alteration notice could be up to 7-8 weeks after the application date.

If No, please explain your reasoning:

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

Yes

Please explain your reasoning: The introduction of the single occupancy tick box has caused a significant amount of confusion. This is interpreted incorrectly when electors are

completing ITRs and has a knock on effect to processing other elector records at the property.

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?

No

If No, please explain your reasoning: Although e-mail addresses can be useful for individuals, correspondence at household level shouldn't be e-mailed as this may not reach the most appropriate person for completion. For example if the only e-mail address held is for an application from an 18 year old, this may not reach the targeted audience of the responsible householders such as the parent, guardian etc.

8 Do you agree with the proposed process for the Route 1?

No

Please explain why: Agreed with the exception of e-mailing in the first instance.

9 Do you agree with the proposal to exclude mandatory follow up activity (household visits, etc.) with households sent through Route 1?

Yes

Please explain why: Route 1 still provides for an opportunity to capture new electors and/or potential changes so no further follow up activity should be required. This can be greatly

supported by regular local data matching all year round to ensure the register is as up to date as possible when the canvass process commences.

10 Do you agree with the proposed process for Route 2?

Yes

Please explain why. : Route 2 provides for greater flexibility in obtaining the information for non-responders.

11 Do you agree that a personal contact (door knock or telephone call) should be a mandatory element of the revised canvass?

No

Please explain why: Door knocking is an expensive element of the current canvass process and does not necessarily lead to successful results. Following the paper HEF a further request for national data matching and/or local data matching could resolve the issue (especially if a period of 3-4 months has lapsed since the initial data matching process). In addition to this a stronger worded letter with the HEF may encourage a response. Personal contact does not achieve high response rates and can result in abuse at the door or on the streets.

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: Consideration could also be given to sheltered accommodation properties with warden officers on site (Responsible Officer could be from the relevant Housing Association for example). Caravan sites, boat homes and nurses accommodation at hospitals can also be difficult to canvass in a traditional manner and may benefit from Route 3.

13 Do you believe this is the correct process to deal with these properties?

Yes

If No, can you suggest an alternative approach?: It should be noted that following receipt of resident information on a HEF it may still not be appropriate to issue ITRs to eligible electors. Although the new process caters for the HEF canvass stage, the following stage of ITR will still remain an issue (in particular for nursing or care homes) and needs addressing.

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

Please explain your reasoning: Yes, contingency measures such as route 2 need to be in place to still obtain the relevant HEF information for all properties.

15 Do you agree with the proposal that pending/potential electors should be included in the data matching and canvass communication?

Yes

If No, please explain why: Not including pending/potential new electors does cause confusion as residents often say they've completed a form to register but this is reflected in the information presented to them on the HEF. Showing up to date information on pending/potential electors on the HEF provides a more accurate reflection of the data held by EROs. Showing both registered electors and other data held will also help with duplicates.

No

Please explain what these are: Consideration should be given to the wording used next to pending/potential electors on the HEF in order to prevent confusion and ensure the assumption is not made that they are registered electors.

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

Comments: In Wales two A3 forms are provided, one in English, the second in Welsh. This causes a significant amount of additional cost to produce and only one form is returned so the second language preference form is disregarded. Previously canvass forms were produced as one A4 form with an insert. A bilingual A4 form will help save costs and waste. This will also assist with scanning as larger scanners were purchased to accommodate A3 scanning however most other scanning only requires the use of A4 scanners.

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

Comments: Section 2 is often completed with additional electors (rather than section 3) therefore section 2/3 could be combined. Useful information on the eligibility, open register, privacy statement, absent voting could be a supplementary leaflet or re-worded to simplify this with comment boxes to the right of the form with explanations.

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?

Comments: Having three potential route options for canvass will require adequate software functionality to manage each process effectively and to also ensure route 3 properties are identified in advance and marked with this option. Reporting on the various canvass stages throughout the process needs to be part of the software functionality with the correct route workflow linked to the properties. National data matching is reliant on the national data being accurate and this should be monitored by the Cabinet Office for regular accuracy and that their records are maintained and up to date. Local data matching is reliant on the relevant department being up to date and accurate; reviews should be undertaken to establish if the data source is current.

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

If No, please explain your reasoning: The AEA Wales branch believes that all EROs should undertake national data matching based on the results achieved during the IER confirmation process. Whilst accepting the match rate changes significantly across the country, we feel that the DWP is a good data source and should be used by all EROs. We also welcome the ability for EROs to decide whether local data matching is useful in their area and which data sources will be of value. We would encourage the Government to help EROs in exploring what data sources, in addition to those they currently use, might be available and how to work with partners to enable them to access this information in a usable format.

2 We are proposing that any property with a red elector must be converted into a red property. A property will only be green if 100% of electors in the property are individually green. Do you agree this is the right approach?

Yes

If No, please explain your reasoning.: Whilst the AEA Wales branch tend to agree with this principle it is worth pointing out that the electoral reform programme in Wales may mean a lower national match rate for younger electors (this could depend on DWP national dataset matching) and consequently a higher level of local data matching may be required for Welsh EROs to turn households 'green'.

3 Do you think a minimum standard for the accuracy of locally held datasets should be mandated?

Yes

Please explain your reasoning: In response to this question the AEA Wales branch confirmed its support for mandatory local data sets.

4 Do you agree that Empty and Void properties should be sent through the data matching process?

Yes

Please explain your reasoning: Whilst it will not be possible for empty and void properties to be included in national data matching, AEA Wales branch believes local data matching should be used. There are EROs with static populations of ineligible electors, for example American military bases, who would benefit from using local data sources, as will those with high proportions of second/holiday homes. We would also suggest that thought is given in guidance as to whether there is merit in recommending EROs data match empty and void properties at more than one point in the canvass, and potentially as a separate exercise ahead of elections. Whilst this isn't necessary for all types of void and empty property, there is merit in the ERO considering the potential benefits of such activity.

5 Do you agree that recent applications to register should be exempted from the data step and automatically marked as green?

Yes

If Yes, what time period you think should be defined as "recent" (1 months, 2 months, linked to the last monthly update)? Please explain: AEA Wales branch supports a time period of not more than two months.

If No, please explain your reasoning:

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

Yes

Please explain your reasoning: The AEA Wales branch believes that, despite revised wording, there are still a significant number of applicants ticking this box when it does not apply. This is causing a lot of work and expense without sufficient offset benefits. However, we support further consideration relating to asking applicants who else is resident in the property. Collecting qualitative information would help EROs ensure that all residents who are eligible are invited to register. We would like to see further work done to see how practical this would be in terms of EMS functionality and ensuring this information could be processed in a straightforward way. As part of this work, we also believe serious thought should be given to the merits in allowing EROs to hold details of those ineligible to register due to their nationality. Without this there is the potential for ineligible electors to be asked on more than one occasion to register.

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

If No, please explain your reasoning: The AEA Wales branch appreciate that this is an area where there are many differing opinions, but on balance we believe that route one households should be able to respond to an e-communication before a paper contact is made. Our opinion is based on what we perceive to be the way citizens wish to communicate and the additional benefits this approach brings. Whilst accepting the e-communication does not mean that the household has been contacted – i.e. by a letter through the door, the communication will be to someone who the ERO is confident is still resident. If the fundamental principle of canvass reform is accepted – i.e. electors' information is confirmed by accurate data matching, then contacting the elector personally should not undermine the process. We also think it gives additional benefits whereby if an elector has been incorrectly confirmed it is letting them know that they are still registered at a previous address so they can take steps to be removed. There are also potential cost savings to be found, although we know at present some commercial suppliers are charging more than the likely cost of a posted communication. There would be merit in the Government looking at e-communication charges and where alternatives could be used. Across all aspects of canvass reform though we would stress the need for all communications to be carefully considered and thoroughly tested. Such testing must include the testing of all English/Welsh language e-documentation to ensure the same quality of communication product is available. It is imperative that the citizen is confident of the origin of the e-communication and understands the actions they need to take. Consideration will also need to be given as to whether all electors with necessary contact details are communicated with or whether it is a limited number within a property. Also, we do not believe those under the age of 18 should be approached. Finally, we feel that email should be extended to include other e-communication options available to EROs, such as text message or a Council app.

8 Do you agree with the proposed process for the Route 1?

Yes

Please explain why: The AEA Wales branch believes that using data to deliver a better experience for citizens is the right approach to take. Electors cannot understand the necessity to confirm their details each year and allowing them to be contacted without needing to respond is a step forward. It will also deliver much needed cost savings to local authorities. We would again stress the importance of the wording on the communication to

ensure that citizens understand what actions, if any, they have to take. In particular we have concerns regarding ensuring changes that need to be made, such as electors becoming 76, reaching voting age or identifying other residents having moved in, are clearly outlined. Also, we believe it is in the interests of the citizen and local authority that channel shift away from paper responses is enabled as far as possible. EROs should be encouraged to make use of these channels rather than require paper replies.

9 Do you agree with the proposal to exclude mandatory follow up activity (household visits, etc.) with households sent through Route 1?

Yes

Please explain why: The entire premise of canvass reform is to make better use of data enabling the citizen to not need to respond to communications when there is no change in the composition of their household. It would be a backwards step to require any ERO to conduct follow up activity. Also, assuming e-communications are permitted, several households will receive two different types of contact giving them an additional opportunity to consider the information they are sent.

10 Do you agree with the proposed process for Route 2?

Yes

Please explain why. : AEA Wales believes Route 2 is the right approach to take given the only properties sent via route 2 are those who the ERO genuinely believes has had a change in composition. In addition, it is essential that the prosecution sanctions for the non-return of the HEF and ITR that are available now to ERO's are still available in the future, if not improved under canvass reform.

11 Do you agree that a personal contact (door knock or telephone call) should be a mandatory element of the revised canvass?

Yes

Please explain why:

There is significant evidence of the positive impact personal contact has on canvass responses. AEA Wales branch are pleased that telephone contact has been included and would suggest that being able to also use email should be considered.

Whilst accepting there is still substantial cost associated with personal canvassing, the proposed new model will see a large number of properties who are no longer required to respond and as a result significantly fewer properties will need to be contacted.

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: AEA Wales believes that the following should be considered: mobile home sites; hospital staff accommodation, armed services personnel barracks, and marinas

13 Do you believe this is the correct process to deal with these properties?

Yes

If No, can you suggest an alternative approach?: Although AEA Wales branch agrees with the process Welsh administrators often find that there is very limited response from ITRs sent to Houses of Multiple Occupation (for example care home or student halls of residence). Until there are changes to the legislation to reform/streamline the follow-up work needed with ITRs issues will persist. An opportunity might exist to consider alternative methods and we fully support the provision of the Route 3 option.

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

Please explain your reasoning:

If the ERO is not able to access the required information then there is no option other than to send the property down route 2. We firmly believe however that further assistance should be given to EROs in helping them to access information from institutions, especially military barracks and students. Welsh administrators also commented that if, for example, a HMO has not responded via the Route 3 process then they are very unlikely to respond via Route 2, which could result in a lengthier more expensive way to get a response. AEA Wales branch would fully support and encourage UK/Welsh/Scottish Governments to pursue their suggestion 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.

15 Do you agree with the proposal that pending/potential electors should be included in the data matching and canvass communication?

No

If No, please explain why: Pending/potential electors are not registered electors and we fear that including them on any communication would mean the clarity of the communication would be compromised. Some ERO's keep pending/potential electors on their software whilst others remove them at periodic intervals or at a certain point, for example prior to the annual canvass. Canvass reform is an opportunity to look at pending/potential electors in more detail with statutory provision being made for pending/potential electors to be deleted at the ERO's discretion once all statutory steps have been taken. We would also seek for there to be guidance to assist EROs in this decision. The AEA Wales branch would also strongly agree that further discretion be provided by EROs in this area coupled with clear guidance. Not Answered

Please explain what these are:

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

Comments: AEA Wales branch believe that having a separate Welsh and English language HEFs is difficult to manage and expensive to administer. Careful consideration should be made to simplifying the current HEF design and looking at the possibility of clear bilingual HEF templates for use in Wales. In addition: Elector confusion – people believe they are registered after completing their details on a HEF not realising this is the first part of a two-stage process with them then having to complete an ITR to register. Size – too large and too much information. Currently A3, however A4 is an easier size to manage for the personal canvass and for the person completing the form, not to mention ERO processing. There are two designs for the HEF – pre-populated and blank. We are aware of some EROs only using the one template for populated and not populated. Consideration should be given to whether is it possible for there to be just one design. There is too much information on page 1 and evidence that residents are not reading the accompanying letter.

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

Comments: AEA Wales branch members often find that electors tended to complete the HEF 'Section 2' with additional electors rather than 'Section 3' and as such there could be potential to combine these sections. The number of lines available for names to be added could be reduced. Pre-populated HEF doesn't need to include postal voting arrangements. Postal vote information at the end of the HEF doesn't need to be included as it will be included on the ITR Reduce the wording on page 1 (letter). Word optional should be reconsidered regarding contact details. We would advise that consideration is given to how the register to vote website has been changed to encourage citizens to provide contact details.

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?

Comments:: AEA Wales branch believe that to ensure smooth transition to the new canvass processes it was absolutely crucial to ensure adequate Electoral Management software functionality and workflow management was properly tested and in place within the scheduled project planning period prior to any 'go live' date. AEA Wales branch welcomes the Government's work to revise the current annual canvass process and deliver benefits to both citizens and local authorities. Whilst supporting the proposals, there are some areas worthy of further consideration. UPRNs. We understand that the national data match will be based on UPRN's only and will not use both the UPRN and address string to match as was the case for the introduction of IER. As a result, the Cabinet Office will need to send appropriate early messaging to EROs to ensure they have UPRNs against all of their properties. We are aware that some EROs do not have full coverage and making it clear the necessity for the UPRNs to be in place is imperative for successful canvass reform is of clear importance. Skillsets within Local Authorities and Electoral Management Software. At present some EROs are not able to carry out local data matching due to the lack of software functionality, skills, resources or availability of data. The Cabinet Office will need to provide support, guidance and funding to EROs to enable them to successfully conduct local data matching. We would also urge the Government to liaise with key stakeholders who maintain databases, such as Council Tax records, to enable reports to be written that can be automatically loaded into EMS systems without individual local authorities having to speak to their suppliers on a case by case basis. Streamlining the HEF process Whilst we support the ability for the citizen completing the HEF to also register in one seamless process, the wording on the communication would need to consider that if they do not have their NINO to hand they can still complete the HEF and then complete their registration at a later stage. Otherwise we fear the completion of HEF may be reduced. EMS Suppliers Canvass reform will be reliant on EMS suppliers and we have concerns as to ensuring they have sufficient time to develop the functionality and ensure adequate user testing. National Data Matching. Whilst we are pleased to learn there will be less restrictions on EROs sending their data to the DWP than there were when IER was introduced, we would welcome further details on the process and the timescales that EROs will have to work within. ERO flexibility. Consideration should also be given to allow for the ERO's discretion whether to conduct a full canvass at any stage, permitting ERO's to do what they feel is necessary in light of prevailing local circumstances.

Section 4 – Glossary:

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| ERO | Electoral Registration Officer |
| IER | Individual Electoral Registration |
| Red Property | Where indications are there has been changes in the property |
| Red Elector | Where indications are there has been changes to an individual's information currently held. |
| ITR | Invitation to Register |
| HEF | Household Enquiry Form |
| Route 1 | New process - for properties where the data suggests no change in household composition |
| Route 2 | New process – for properties where the data matching highlights that there may be a change to the information the ERO currently holds for the property |
| Route 3 | New process – for households of multiple occupancy 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 |
| DWP | Department of Work and Pensions |