Select Committee on the Electoral Registration and Administration Act 2013

Corrected oral evidence: Electoral Registration and Administration Act 2013

Tuesday 23 July 2019

3.30 pm

Watch the meeting

Members present: Lord Shutt of Greetland (The Chairman); Lord Campbell-Savours; Baroness Eaton; Lord Hayward; Lord Janvrin; Lord Lexden; Baroness Mallalieu; Baroness Pidding; Baroness Suttie; Lord Wills.

Evidence Session No. 2   Heard in Public   Questions 17 – 30

Witness

I: Peter Stanyon, Chief Executive, Association of Electoral Administrators.

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Examination of witness

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Peter Stanyon.

Q17   **The Chairman:** Good afternoon and welcome to this evidence session of the Select Committee on the Electoral Registration and Administration Act 2013. You have in front of you a list of interests that have been declared by members of the Committee. The meeting is being broadcast live via the parliamentary website. A transcript of the meeting will be taken and published on the Committee website. You will have the opportunity to make corrections to that transcript where necessary.

I will come in with the first question. One of the reasons given for the introduction of the Act was to tackle fraud. Has it been successful in this? Are there other vulnerabilities to fraud that have still not been addressed?

Peter Stanyon: The biggest benefit of the Act was that we can now be assured of the identity of each elector, in that we know there is a person of that name in the UK. Prior to individual electoral registration coming into being, it was simply household registration. We were effectively taking the details of the individual on face value. Now, with the verification process in place, it is clear that there is somebody of that name or that identity in the UK. As a result of that, yes, it can be argued that we are putting the names of people in the electoral register who are legitimate; there are no more applications that are fraudulent in that way.

Having said that, there is still no residency validation. It is still down to each individual electoral registration officer to be satisfied the individual themselves is living or residing in the property they are making the application to register at. In terms of the vulnerability, although we are certain or more certain that the individual exists as an individual entity, there is still that weakness in the system about the validation of the fact that somebody lives at the property they say they do. It is certainly a more robust system, but it is not the perfect system as things stand, because you are still reliant on the applications being made.

There are still some elements of doubt. I am sure that some of the later questions will be with regard to the additional challenges that are being faced by administrators. We have taken one element away, but we still have the same element of being sure the person lives at the property they say they live at. It is almost a double-edged sword, but, in the scheme of things, it is certainly a more secure system. It has not removed but has lessened the ability of somebody who does not exist to make the application to join the electoral register.

The Chairman: How would you tackle that?

Peter Stanyon: In terms of residency, it is difficult. Ultimately, there is still a need for EROs—electoral registration officers—to make the checks on individuals. One of the key changes that is rolling through the world of electoral registration is recognition of the need to share data and the

need to use public records to validate against other sources that public authorities hold. That may well be one route. That is being done as part of this process; it is an element of that assuredness.

Ultimately, there are simple routes as well. A person making an application simply provides evidence that they live at the property at the time. The biggest potential area for fraud is when someone makes an application late on prior to an election. The potential for fraud is in the run-up to a poll, because the checks that may be taking place now are easier to undertake than in those last few days. There could be something that says that an application that comes in should be with supporting evidence to take away that doubt. There could be a requirement for a link into things such as council tax, other council records and other government-held records. It is those sorts of things. It is a jigsaw puzzle.

The simplest way around it, though the most cost-intensive, is to knock on the door and see whether the individual lives there. The reality of the time and the resource we have available makes that very difficult.

Q18   **Lord Lexden:** You anticipated a question about the burden of work, and here it is. Could you tell us, please, how the introduction of individual electoral registration has affected what you and your colleagues do? Perhaps you could also give us an assessment of the benefits and disadvantages of the new system.

Peter Stanyon: It was a sea change when it came in. In terms of process prior to individual electoral registration coming into being, we had rolling registration. We had a more living, breathing register compared to what we had prior to rolling registration coming in. There was the ability to make it slightly more accurate ahead of elections.

The majority of the change to process was identified during the annual canvass period. That has changed. That is the fundamental change in terms of process. It is now an auditing exercise, in which you are identifying individuals and deciding whether they should be invited to register to vote on that basis. The two-stage process has been quite significant in terms of that. In terms of workflow, there is now the obligation on registration officers to identify potential electors, which was not there previously. That all came through the annual canvassing process.

The biggest sea change was the fact that online registration came into being. That fundamentally changed the process. It is still very much a paper-based system. Registration officers must send out predetermined forms designed by the Electoral Commission. They are A3. A lot of paper goes out. There are significantly reduced numbers coming back in, but it has also moved the ability of citizens to register once, twice, or three times in some instances, right up to the deadlines. Previously, it would be in paper form.

I talk about virtual piles of applications. I did a training course for some returning officers only last week, and I said that one of the things you would see, if you went into an electoral services office before an election prior to IER coming into being, would be piles of applications. You would know how much pressure that team was under to process them. That is not there now. Those piles are virtual. They come in much later and there is the ability for individuals to make more than one application in that way.

There has been a fundamental change to the way the electoral administrators react and work with their local authorities. It is not about obtaining the information during that one period of the year; it is now a year-round process. The fact that you are seeking that information has fundamentally changed the way an electoral administrator will approach these things. It has been an absolutely huge change to the work of the electoral administrators.

There are lots of benefits to being able to do that, certainly for the citizen. One disbenefit or disadvantage is that the pressure of electoral registration is being moved right into the election cycle, because registration effectively closes five days before a poll. It can go right up until 9 pm on polling day. That register is still living and breathing, with information coming in two ways. I made the point to the Committee in an earlier session that, certainly in England and Wales, the individuals who are delivering the election are the same people who are delivering the registration process. The biggest challenge to elections recently has been as a direct result of registration seeping into the elections process.

It is massively beneficial for the citizen and for democracy generally, but there are huge administrative challenges presented to electoral services officers up and down the country.

Lord Lexden: How have your colleagues adapted to these significant changes?

Peter Stanyon: They have adapted very well. "Adapted" is the exact word. It has been a learning exercise. If I remember rightly, there was a parliamentary election not long after individual electoral registration came into being, so it was very much about learning. It was almost a fire-fighting exercise to ensure that the registers were as complete and accurate as possible as we moved into that election. The more fundamental move is to go to the year-round canvassing, and that is being developed as we go through. Yes, the profession has moved from where it was.

The other thing to add is the reliance on software and the ability for IT systems to produce what administrators need because of that fast-moving environment. Previously, it was registration, election, registration, election. That has now gone.

Q19 **Baroness Pidding:** My question is in two parts. Has the introduction of individual electoral registration had any impact, positive or negative, on

the efforts to identify and reach underregistered groups? Are there any examples of good practice in identifying and registering those people?

Peter Stanyon: It certainly introduced challenges. With the household registration process, the most high-level example would be student halls of accommodation at universities. Under the previous system, the bursar or the administrator would provide a list of students and they would just be added on to the electoral register. There was effectively no choice for the student in that way. There is evidence that shows significant drops in registration in some university towns in wards where there are students, because the previous automatic registration, if we can call it that, did not happen.

The same has seeped across to residential care homes where there is a constant flow of residents. Previously, the head of the home provided that information. Now that is not the case. They have to provide that information and then we have to seek additional information from individuals. Anonymous registration has been moved on as a result of changes made very recently. That made it slightly more difficult to register individuals in such groups, as with young people generally. The underrepresented groups have not changed; they are still exactly the same groups. Registering them is more difficult because of the two-stage process now. Good practice will be intermittent across the country.

Going back to the student registration, the best example that is quoted is in Sheffield, where there is a very close working relationship with the registration officer at the University of Sheffield and Sheffield Hallam, and places like that. That means that there is two-way communication. That is not consistent across the UK. In some areas, there is a reluctance to share that information. As a result, the Office for Students has produced guidance for students that kicks in this autumn about how there is an expectation on universities and colleges to assist the identification of individuals themselves.

In terms of the identification of individuals, there is still a requirement to advise us of the individuals in these locations. Registration of those individuals is much harder as a direct result of the move to individual electoral registration. The good practice very much depends on the working relationship that the registration officer is able to develop with that individual establishment, whether that be a university, a residential care home or whatever.

Baroness Pidding: Are you aware of any examples of good practice where officers have been able to reach out to BAME communities?

Peter Stanyon: I cannot quote specific examples, but I am aware that a number of local authorities have done exactly that. Knowing the correct language or the correct levers to use to encourage people to register depends very much on working closely with community leaders and the organisations that represent the particular group. For young people, often the lever is to tell them about the benefit of being able to obtain credit by

being on the electoral register. They can move into building their credit file through that linkage to the electoral register.

The approach advised by the Electoral Commission, which we fully endorse and support, is that it is about the working relationship that registration officers build with all elements of the community, whether that is BAME, students or young people. It is about working with those who are working directly with those individuals on a day-to-day basis. The language that is used will then be the correct language that will be the endorsement of the benefits of registering, whether that is simply to obtain credit and get on the register or to participate in the democratic process through elections.

Q20 **Lord Wills:** My apologies for arriving late. At the time the Bill was going through the Lords, I recall the Minister discounting the effect of the system of registration on levels of registration among hard-to-reach groups. He argued at the time that far more important was the level of interest in politics. He exhorted everybody in the House to get more engaged. Since then, there has been some evidence to suggest that he was right, with the levels of registration going up at times of high electoral interest.

In light of the experience, how far has this new system of registration been responsible for the levels of registration among these hard-to-reach groups? How far is it to do with a general level of engagement or disengagement with politics?

Peter Stanyon: It is your second point: the engagement or disengagement with politics generally. From the points we have picked up, whether there is engagement is regardless, in many respects, of the groups themselves. There are certain groups where you get the buy-in. I have some statistics that show exactly what you mentioned. One of the fundamental changes is event-driven registration. That has fundamentally changed where we are at.

Just after the 2017 parliamentary election, there had been 21.5 million registrations online, of which 7.5% had been made on three single days out of the 2,000 days. They were all in the run-up to the UK parliamentary election in 2015, the EU referendum in 2016 and the UK parliamentary election in 2017. They were the spikes. There were 500,000 on each of those days. The shift has been on the basis that event-driven registration has affected the process that electoral registration officers follow, because it is aimed towards that register on polling day.

In terms of the disengagement or perceived disengagement in certain groups, you will see similar spikes in the statistics, but again it comes down to the language that is being used to encourage individual groups, such as students, BAME, young people or people in residential care homes, as to their engagement in the political process. First, are they able? Secondly, are they going to engage in the actual voting process itself?

Lord Wills: For those of us who have spent a lot of our lives engaged in the practice of democratic politics, it is a rather worrying sign that generally there are large numbers of people who only get engaged when something is hitting the headlines. Of course, what happens in this place affects everybody all the time. Is there a case for a more systemic approach, certainly in schools and colleges, towards civic education? Would that help this process of registration to increase?

Peter Stanyon: Citizenship is a national curriculum requirement. Schools struggle to build that in because of the other pressures on them, but, yes, absolutely. I have given presentations to schools and they have been very well regarded. It is about making it real to young people about what this actually means. When you talk about the history of this place and the history of democracy, it is fascinating. You can see that almost in the history stream.

The nature of registration under IER has now fundamentally shifted. With the canvass reform things coming, it is accepted and recognised that there is a need for there to be a canvass of sorts, whether that be an audit or something else. It is about the need to maintain registration levels at a reasonable level. That is on the back of the fact that, because of the easy way in which citizens can now engage with the registration process, in some ways it does not matter if someone is not registered three months out. The most important thing is five days before the poll when the register shuts down.

One of the fundamental shifts that IER introduced is that there is still a requirement to revise and republish the register on 1 December, but that is not the most complete register. The most complete register, ironically, is the one a month after the election, when you have taken off the people who should not have been there. The fundamental thing is to make sure that, when you walk through that polling station, you have been given that opportunity. That is a big benefit in relation to the spikes coming in. The disbenefit is that in some respects it means that the registration levels are slightly lower, particularly in non-election years.

Colleagues in Scotland spoke to me about this recently. They had a raft of polls back to back for a long time. They have not had one in a while now and they do not expect one until 2021, subject to unexpected events. Therefore, the quality of the register is coming down, but they know they have to resource up for that huge spike in registrations as they go in. That applies equally to any of the individual groups we have talked about.

Lord Campbell-Savours: Can I give you some stats that I took off the ONS this morning? The population in 1997 was 58.31 million. The population in 2019 is 67.53 million. That is an increase of 9.22 million. The electoral register has only gone up by 3.1 million. What has happened there?

Peter Stanyon: I can only surmise. I cannot give you the full facts, because I do not know them. The electoral register is based on the

nationality of British, Irish and Commonwealth citizens. It is a far more multicultural society. There may well also be an element of individuals who are not eligible to register. The classic example is an American citizen. They will live here and pay tax here, but they will not be able to register to vote here because of the franchise. There may also be an element of there being a younger population of those who have not yet reached the franchise age.

It was not for want of trying. Electoral registration officers are trying to get individuals on the register, but one of the biggest challenges is the fact that it is still effectively a voluntary system. It is not a truly voluntary system, because there is a requirement to provide truthful information to registration officers, but it is resource-intensive to try to identify somebody if they are adamant that they do not wish to go on the electoral register for whatever reason.

Lord Campbell-Savours: Could that be one reason for the 3.1 million on one side and 9.22 million on the other? Are people simply refusing to register under the new system?

Peter Stanyon: Whether or not they are refusing to register on the new system, there has always been a reluctance to register. It may well be that, absolutely. Whereas previously the head of a home or one person in a home will have filled in that form, now if there are five people in the property, three may register and the other two will not.

Lord Campbell-Savours: On that very matter, can I take you back to the old system of household registration and ask you a question? I suspect it will require a lot of courage to answer it in the way I would want it answered.

If we kept the old system and simply enforced greater ID control at the polling station, would that not have solved the problem? This was driven by fraud, originally. All the documents talk about fraud being the original driver. If we had greater ID control at the polling station in conjunction with the original household registration system, what would have been the flaws in that as a solution?

Peter Stanyon: In terms of the actual voting process, which is the primary reason for the electoral register, I see potential merit in what you are saying. Ultimately, it is about identifying the individual at the polling station, which is obviously the purpose of the voter ID pilots that have run in the last couple of years. However, the electoral register is not used solely for voting purposes. It is used for crime prevention and detection, and by credit referencing agencies to identify individuals as part of other records.

Lord Campbell-Savours: That was never the driver, was it?

Peter Stanyon: No. The fraud was electoral fraud, but the point I am trying to get at is whether registration would have been as complete and accurate if it was left in that way. The flaws in the previous system that

were identified by the various experts would have still been there, but it would have resolved the issue when it came to polling stations.

Lord Janvrin: I have two questions on resources, but can I just come back to something you have said? I just do not quite understand the process. You said that the register is most accurate a month after an election, because you have been able to take out those who should not be on the register. Could you just expand on that? Who are the people you take out? How do you know they should not be on the register? Is it simply that they do not turn up? Is there an investigating process?

Peter Stanyon: Basically, it is seen as being the most accurate register because you have the new applications coming on prior to the election. That is the positive element to it. This is not the right word, but the negative element is those coming off. When official poll cards are sent out to addresses and then sent back, an elector might have moved away recently.

It is about cleansing the register using information that has been gleaned during the elections process. It is not a straightforward case of just taking someone off because the card comes back. There is an investigation process. There is a requirement, except in a case where somebody is deceased. It is a case of getting a second source of evidence to prove that someone is gone. I say "negative", but it is not negative. It is about cleansing the register of those who have been identified through the election.

Q21 **Lord Janvrin:** Can I come back to resources, a subject that is no doubt close to your heart? What assessment has been made of the financial and resource costs of the individual electoral registration system? Do electoral registration officers have adequate resources to do their job?

Peter Stanyon: I do not have figures for the amount of money and resources that have been spent nationally. The Cabinet Office will have those figures. The first year in which IER rolled out, the Cabinet Office put aside £13 million of additional funding to meet the additional costs that were incurred by the introduction of individual electoral registration, primarily from things like the requirement for A3 forms and the requirement to process every applicant rather than the household if there was an application. There was also a justification-led bid process for electoral registration officers who identified that they were meeting additional costs as a direct result.

There are statistics, although I do not have them with me. There was a falling scale of top-up funding to registration officers and local authorities, which ends this financial year. Effectively, that is being cut off at this particular point. There are no records, to my knowledge, of the additional costs incurred by local authorities. It is purely that top-up funding on top of local authorities, because local authorities changed the way they did things. Some local authorities will charge all their postage costs to a central budget, some will charge them out. It is difficult to get those true costs in that way.

On the face of it, it is a more expensive system, but we are getting to the point where efficiencies are being driven by online registration and there has been a reduction in the need to call necessarily at every property, as previously. That was the Government's view of the reason for a reduction in the actual costs themselves. That will in effect be a nil cost for the next financial year, as things stand.

Do local authorities and EROs have the resources to do their job? It will vary from local authority to local authority. Some are very much struggling and will be doing the bare minimum according to law and, in some respects, possibly less than what is required according to law. It is very difficult to keep the year-round canvassing going. Others will have thrown an awful lot of resource at it to ensure that their registers are accurate. There are almost two ways of looking at it. You either rely on event-led registration, because you are going to get that anyway, or you do your best and then have the resource implications ahead of a poll. The other end of the spectrum is where you end up having a process where you keep the register as up to date as possible across the year and then that negates those spikes just ahead of polls.

They will be somewhere in between. It very much depends on the local authority concerned and its battle for resources. According to law, local authorities must provide electoral registration officers with sufficient resources to maintain a complete and accurate register. It has never been tested before in court. At the end of the day, it is the argument about whether resources go to social services or to registering people to vote. That is a local decision. The Cabinet Office accepted that additional costs were incurred by the introduction of IER, but they are now being tailed off. Effectively, local authorities are now taking that resource in-house themselves.

Lord Hayward: Can I just follow up on that? I am conscious that, particularly in recent years, we have imposed an ever-increasing burden of elections with regional mayors, police and crime commissioners and the like. Parts of Northumbria, for example, started on a local election process in March and have a police and crime commissioner by-election still running. In effect, they have been running elections for about five months.

In AEA's evidence before this Committee, you referred to this spike of hundreds of thousands of people. Would it be possible for individuals to have online access to check whether they are registered but not to change the register? It is clear that a lot of the people who made applications were making them because they were not sure whether they were there. If I had the opportunity to look on Southwark Council's register, for example, I would know whether I was there. Therefore, are large numbers of those people not applying to go on the electoral roll because they are actually already there?

Peter Stanyon: Potentially, yes. The issue comes down to the security of the individual's records.

Lord Hayward: Presumably they would be secure if they were read-only.

Peter Stanyon: The electoral register is a public document. It is available for the very good reason of the integrity of the electoral process. Historically, people can challenge the individuals who are there. That is now done under supervision. If I go to Southwark Council, for example, and I see my colleague Fran there, she will sit with me while I look at the electoral register. That is the safety check.

The ideal situation would be that, yes, you could go online and check to see what your record is. The biggest challenge is that Peter Stanyon can go online and check his record, but can he go on and check his wife's record? What stops me from surfing in that respect? How do we know a John Smith is a John Smith? There are a number of technical challenges, one of which is the fact that there is no single point of record, other than a national insurance number, that individuals hold. There is a date of birth, but it is the national insurance number. There is reluctance to release that to allow individuals to look online and use that as their record to check.

You can do it on individual local councils' websites. They will have set up a customer ID record that you register with your local authority. That will often cover 30%, 40% or 50% of the local electorate. They have given their permission to the local authority and they have an ID number to go in on. That is the biggest challenge: how do you stop someone surfing to check whether someone is at an address or not? I do not know whether I have answered the question.

Lord Hayward: You can surf by turning up at a library and asking for the electoral roll. What is the difference between doing that and going online?

Peter Stanyon: The electoral register that you see in a library will be the edited version, where the individual has not made the request to hold their details privately. In fact, the majority of electoral registration officers have now withheld the full registers from libraries and other public sources, because the obligation is for the inspection of the register to be done under supervision. If you want to see the full register at the central library in Southwark, you will see it under supervision. That is only the Southwark library.

I am giving these things as reasons why you could not have a look-up facility. I would love to have a look-up facility, but it is about what checks and balances are in place to make sure that somebody is not sitting in Glasgow trying to find out the details of someone in Cornwall. That is the difficulty that has been shown to us. At the end of the day, there are 380-plus electoral registers around the UK. How do you join them all up?

Lord Hayward: That is a different matter.

Peter Stanyon: To do something online, you would need to go to the individual local authority or through that local authority in some way to identify that. The only other places where you can see all the registers

are the British Library, the National Library of Scotland and the National Library of Wales, but, again, under supervision. It is one of those clashes between access and ability.

Anything that would ease an electoral administrator's life by stopping duplicate applications coming through would be welcomed. The issue comes down to the fact that the system is not there at the moment to do that.

Q22 **Baroness Suttie:** The last time we met, you were not actually on the record giving evidence. Can you recall how much it costs per person who wants to double-check online that they are on the electoral register?

Peter Stanyon: You mean to check?

Baroness Suttie: I have done it on a few occasions myself. I am registered in two different places, and when I have wanted to make doubly sure that I was on the electoral register I have gone online and re-registered. How much does that cost?

Peter Stanyon: I do not know the actual physical cost. The thing with duplicate registrations, which is what that would be classed as, is that it takes as long to process a duplicate registration and identify that it is the same person as it does to process a brand new application. There is no difference in the time taken to process.

The statistic I quoted from our records the last time I sat before the Committee was that in the run-up to the 2017 general election, 60% of applications were duplicates, and 40% were new. One hundred per cent of those applications took time, but that generated 40% new applications. The positive aspect is that new people were going on. I cannot give you monetary figures, but the simple answer is that it takes the same amount of time not to register a duplicate, because you are identifying that is who it is, as it does to register a brand new application.

Q23 **The Chairman:** I have a further question, which I would like you to consider. I am sure the AEA is a splendid body.

Peter Stanyon: It is the best.

The Chairman: To what extent is this fraternity recognised? You talked about running training courses and so on. Is every electoral returning officer a member? Are they all in the club? What about attending the courses? Do they all attend the courses? Do they say, "Just a minute. We have enough with the Electoral Commission on our backs without fellows like this"? Can you give us a feel for the standing of your organisation with the people who ought to be perhaps your fiercest supporters?

Peter Stanyon: That is a very good question. That is right on the spot there, is it not? We have just under 2,000 members. The vast majority of them are those who deliver the process rather than returning officers, because Solace will represent returning officers, although we have some returning officers on our books.

In terms of standing in the community, when I was before you previously I mentioned that the organisation was set up 31 years ago because the Electoral Commission did not exist. It was about sharing good practice and peer support. We have developed training. We are now spoken to by government and invited by the Cabinet Office, the Home Office, MHCLG, and by this very Committee, because we are able to represent those who deliver the actual process itself.

We have 11 regional branches. They all work individually, and then we have a national organisation. I have just come from a branch round table where they are talking about what more we, as an organisation, can do for those who are delivering the process. Do we have every electoral administrator registered? No. That is the simple answer.

Our membership fee is £50 a year, and for that they get access to a lot of information. In the European parliamentary elections that have just passed, we were able to pass information to more people than the Cabinet Office and the regional returning officers simply because we have the database to do so and to get the messages out. We are represented in all but one local authority in the UK. We represent people in Northern Ireland, Scotland, Wales and England, apart from one local authority.

Although the coverage is not universal, local authorities have universal access to the resources that we have. We act as a conduit for information from the Cabinet Office and the Electoral Commission. I would not go so far as to say that we act as a lobbying body, because we are not a lobbying body. We are there to say, "These are the practical implications for a change in policy". We are listened to when it comes to what changes are a sensible move. We have no right to be at the top table, but we have fought our way to that top table and so are a critical friend in that way. That is probably the best answer I can give you. I do not know whether that answers your question.

The Chairman: That is helpful. I want to ask you specifically about that one local authority. We might talk to our clerk as to whether that would be a place that we might visit.

Q24 **Baroness Suttie:** Could you say a bit more about your assessment of the voter ID pilots? If they are rolled out further, what impact is that likely to have? What extra resources and support would electoral administrators need?

Peter Stanyon: The Electoral Commission has just reported its assessment of the pilots. I would place on record that the returning officers and electoral administrators need to be lauded for the efforts they made over the last two rounds of pilots. They took the challenge head on. Lots of lessons were learned. We do not necessarily have a view as to whether voter ID is required. It is about the perception of fraud. As things stand, it has always been a trust-based system. Are we reaching a point where more than trust is needed in the form of identification? That is a policy decision for government.

We are concerned. We do not yet know what the voter ID system will be. There are four separate schemes that were tested over the last two years, and we still do not know what the final system will be. Because of that, we have concerns. According to the current timetable, rollout will be at the 2022 general election, the next scheduled election. That will be the first time many electoral administrators have the opportunity to do so. Only 20 or so local authorities have been involved so far.

We have concerns about ramping up the ability to cope with a general election-sized turnout, which will be 65% to 70% in some areas, compared to the 35% to 40% average for local government elections. What will be the implications? For the pilot authority areas, it is reasonably straightforward. They have been there; they understand the challenges. It will be very much a case of how we share that good practice down to those who have not yet had the opportunity to roll the pilots out.

An awful lot of responsibility will be thrust into the laps of volunteers. Electoral administrators will be able to train them and provide the relevant guidance, but ultimately the presiding officers and poll clerks in polling stations are volunteers. They do it for one day a year out of 365. Whether they will do exactly the checks that they are required to do across the whole of the UK will be a challenge.

We have to consider polling stations and practical things. There will inevitably be delays in polling stations where someone has not come with the correct ID. With a higher turnout, will that cause issues? There are lots of ifs, buts and maybes. This is the uncertainty. Is there back-office support? Assuming it is a photo ID or a mixed-model approach, what will the implications be for local authorities to produce that back-office ID, the photograph ID, to take instead of a passport or driver's licence, et cetera? There are also concerns about the timing of the legislation. We are in a very uncertain period of legislation at the moment. If it was legislated for tomorrow, we would be much happier than if it was legislated for six months ahead of a poll.

That sounds rather negative for the process. The process will be administered very effectively by administrators, but it will not be without its challenges because only 1% or 2% of administrators have run it so far. One hundred per cent will be running it across the board when it comes to this.

Lord Lexden: Presumably, there will have to be a big public information campaign.

Peter Stanyon: In all the pilot areas, that is one of the very big benefits. I happen to live quite close to Watford and I walked through the train station there. I was hit by posters every five steps: "Take your voter ID". It would absolutely need that. In many respects, a national poll will be easier to manage in that respect, because the Electoral Commission will be able to do that with national television coverage and the like. There will still be people who will turn up without the ID. It is about how you

manage that and mitigate it ahead of the game. The risks that will come are more to do with higher turnout than the process that will be in place, because it can be advised very much in advance.

Q25 **Lord Campbell-Savours:** My question is very simple. Would a national identity card make the whole process much simpler by establishing identity at a polling booth?

Peter Stanyon: Absolutely, yes.

Q26 **Baroness Mallalieu:** Can I ask you about Sections 14 to 23 of the Act, which make quite a number of administrative changes? What is your assessment of those provisions, and do some of them need to be revisited?

Peter Stanyon: In the main, they are all very positive. They made sensible changes to process. I have the sections in front of me here. The extension of the timetable for parliamentary elections was very well received, although it is a slight misnomer because it is not a 25-day timetable for administrators; it is a 23-day timetable. It is still longer than the 17 days that used to be the process.

Although that is a very positive element, the big issue we have with the parliamentary timetable, and in fact any national poll timetable, is how we can administer overseas electors. It is not so much the applications process, but the postal votes. Where they request a postal votes, in the European parliamentary elections there was evidence that in some instances they just did not get to the elector in time. According to the parliamentary timetable, you know the candidates 19 days before the poll and send out postal votes 17 days before the poll. Is there the ability to get them back in that time in certain parts of the world?

Equally, that timetable can allow registration up to five days before the poll. There is no way a postal vote will get there and back in that time. There is a weakness there. It has not dragged returning officers into disrepute, but it is unnecessary because of the way timetables work. Generally, it is positive on that side.

The alteration of registers pending the election is very welcome, because it means that the registers that are going through are more accurate right up to the last minute. It goes back to the point about not necessarily changing the process but being aware that it has shifted registration right up to the last minute before the election. In England and Wales in particular, that has brought risk into election delivery, because the same individuals are delivering that. The actual process has meant that there has needed to be changes in the resourcing of registration.

We would still hold the view, as an association, that the review of polling districts and polling places should be an administrative function, not a political function, because if the ERO is running the election it ought to be the one identifying where the actual polling stations are. At the moment, councils have that responsibility. In the vast majority it works very well,

but there is potential for there to be political involvement that is unhelpful in some respects. We would still make that recommendation, although we accept that there is an interest held by both the political parties and the politicians on councils.

Voters' ability to wait at polling stations at close of poll was absolutely welcomed, because of the issues in the 2010 general election. If voter ID is rolled out, that will come into being because there will be more people waiting at close of poll for the reasons I gave, and certainly for the first reason, as people learn how to bed the system into place.

The other really positive one, which I would not necessarily make any changes to, was the notification of rejected postal votes. There was a great deal of fear for administrators originally, because we are telling someone, "Your vote has not counted. We have not even put it in". In the main, it had a positive effect in stopping that happening election after election.

That said, we have had two back-to-back polls in the last couple of years. Certainly taking the last two, from the local elections on 2 May to the European parliamentary elections at the end of May, that means there will have been people who had their postal vote rejected on 2 May who would have had it rejected again for exactly the same reason at the end of May for the European election, because there was no time to get their signatures and dates of birth changed. There is nothing you can do about that, given the timescales involved, but there is a weakness in trying to put something right but not being able to. Again, there is a resourcing issue there.

There are other elements. The poor performance of ROs has been looked at once. There are PCSOs going into polling stations. There is the repeal of the Co-ordinated Online Record of Electors. It goes back to the question: if that was there, would there be the ability to check up? I do not know, but there were reasons why it was taken away.

Other than that, there have been very positive changes, which in the main have helped the citizen and not added too much of a burden when it comes to the process and the adaptability of the process to take these bits and pieces on.

Q27 **Baroness Eaton:** Can I ask you about the annual canvass? What are the key problems with the annual canvass at present? Will the proposed reforms make any difference?

Peter Stanyon: The major challenge is that the canvass does not register people to vote now, as things stand. It is an information-gathering exercise. I made the point about the electoral register on 1 December not being the most accurate register. That is because you have to complete the household inquiry process in that July-to-November process, but registration continues onwards. Therefore, you are picking up names and inviting people to register in November who will not be in December but who will appear in January and so on.

Fundamentally, it has become a two-stage process, which has become, I have to say, rather bureaucratic. It is seen to be bureaucratic by potential electors in some respects. It is also seen to be costly, because ultimately, as things stand, you are requiring a response from every property, regardless of whether there has been a change or not. I have worked in local authorities where the churn rate has been only 10%—only 10% of the electorate has changed—and I have worked in a local authority where the churn rate has been 70% because of the transience of the population.

Canvass has a role to play. I made the point earlier about Scotland not having elections for a significant period and the potential reduction in the completeness and accuracy of the registers that they will be taking care of. They very much need the canvass to maintain a reasonably accurate level. It is not ideal at the moment. Some will argue that it should go completely, but it is about that information-gathering exercise, as things stand.

We support the Electoral Commission in their feedback to government. The changes will assist electoral registration officers. The discernment model that is being introduced, which does not require responses where there is no change, makes resource sense. We have concerns, however, that the very fact that you not seeking a response could mean equally that individuals are being missed. The advantage again is that last-minute registration that you can go to.

It will rely very heavily on data. That annual check will be done on the DWP's customer database, which is where the original applications are currently checked now. We would support the Commission and go further. There should be more databases available to registration officers: DVLA, HMRC, the Passport Office and the Department for Education. There are lots of data-rich sources that would help the ability to invite people to register.

The Commission has gone further, in talking about the ability for automatic registration. That comes with its risks. Equally, if data is there, should it not be there to assist the citizen? Often, a complaint that citizens make to registration officers is, "I am registered for council tax, but I am not on the register". There is that two-stage process. It is there for a very good reason. I keep going back to very first question that was asked about whether fraud has been reduced in relation to the electoral register. You need that validation; you cannot just passport across. A policy decision needs to be made as to accuracy against the ability to register easily. That is a decision that is being tugged with at the moment.

Would we go one stage further? A question was asked about an ID card and about the ability to validate registration. Could something be done with first registration and an ID number for electoral registration purposes only? One of the big issues, again, comes back to duplicate registrations. It is about clearly identifying someone as the same person, or clearly identifying that somebody has moved. Half the process now is

not about registering people to vote; it is about maintaining an accurate register and removing people from the register as much as putting people on the register. At the moment, it is a bit of an ad hoc process.

The processes that are being proposed to be brought in are welcome. They will reduce the burden on local authorities. It remains to be seen whether that will affect the accuracy of the registers and how easy it is to share data within local authorities and across government sources to maintain those things. The proof will be in the pudding, at the end of the day. It will certainly be a challenge for administrators to see another sea change, given the way they are looking at doing these things. We will see as it rolls out, assuming that it rolls out, and as we work our way through it.

Q28   **Baroness Mallalieu:** You say that you would like to be able to use more databases for comparison purposes. There clearly seem to be people who do not want to be on the electoral register. One of the fears, one suspects, is that they do not want their details to be checked by a range of people. Would that be worsened if you had your way and were able to check the applications against a range of databases?

Peter Stanyon: It would not be worse, because the individual still needs to make that application. As I say, registering to vote in the UK is voluntary. You must make an accurate response to a request by the registration officer, but if someone is beneath the radar, they are not committing an offence by being so. That is the nature of the UK system that has built up over the years.

You could go for automated registration and simply taking any database and putting people on to the electoral register. Rather than it being a civic right, it becomes a responsibility: "You will be on the electoral roll". Do you take it a stage further and talk about the Australian system: "You must vote in elections"? It is an academic argument and a policy argument which government would clearly need to debate if it went down that route.

Access to greater data means that the registration officer is able to do their duty in identifying a potential elector, and then there is the route to give that citizen the opportunity to become an elector and participate in the process. Given the data-rich resources that are there, it will simply add to the ability to identify people to give them that opportunity.

Q29   **Lord Campbell-Savours:** I hope for a brief response to my question. Are there any particular challenges arising from differences between the devolved Administrations in ensuring that individual electoral registration and electoral administration work across the UK? I have a copy of your report in 2017 in mind. At paragraph 2.9, you talk about the system being at "breaking point". At paragraph 2.12, you refer to high staff turnover. Thirdly, in paragraph 2.16, you talk about counselling of staff. It is in that context that I would like you to reply: the counselling of staff, staff turnover and whether the system is at breaking point now.

Peter Stanyon: As an organisation, we provide counselling services free to our members. We purchase that in, because it became very apparent at the unexpected general election that staff were at breaking point. There is a misconception that there is a huge machinery behind elections. It is often a couple of middle-ranking, low-paid staff within local authorities.

With the pressures now on local authorities on general resourcing, they used to be able to draw in the resource from the local authority but now they cannot do that. It is not for want of people wanting to assist. A lot more is being focused on reasonably junior staff in authorities.

An election is a project that will always run. There are so many deadlines that cannot move. We are about to release a post-election statement—this week—to the Minister for the Constitution, which I am happy to share with the Committee, about what we believe are the major concerns with the process. A lot of it comes down to the ability of local authorities, the wider electoral community and government itself to deliver electoral processes in the current environment.

We are concerned about our members. We have done what we can to support them. One of the big benefits of the association is the ability to pick up a phone and talk to somebody doing exactly the same job, and they can talk you through these sorts of things.

In terms of the system moving towards breaking point, linking back to the question with regards to devolution, it is clearly the right of the devolved Governments to decide what system is right for their areas, and we would fully support our members in both Scotland and Wales to do that. As much as anything else, the issue, going back to the challenge that is faced by administrators, is that at different polls there will be different franchises and different ways of registering. There will be the sorts of things that lead to voter and elector confusion.

If votes for 16 and 17 year-olds come in for Wales, it will be only for Assembly and local government elections. If that is combined with a parliamentary general election—it will be the same in Scotland—you have the same people coming through the door who can have one ballot paper for one but not for the others. If Wales was to go as far as doing automatic registration, that would only apply to local government and Assembly elections. It would not permit them to be registered on the parliamentary register. How do administrators administer that system?

Careful thought needs to be given to the steps that are being taken to ensure that there are no unintended consequences. When I was before you previously, I mentioned things like prisoner voting rights. Scotland is consulting on it, and Wales has just been through a Select Committee on that very process. In Wales, there is no female prison. All the female prisoners are in England, so there would need to be building and working between different organisations to register those individuals to vote in certain elections.

There are lots of different balls in the air. Going back to the original point about the stresses on the teams, they have to cope with that, alongside the fact that, if there was a snap parliamentary election or a snap European one, as it happened to be, they have to deliver that according to the timetable.

Q30   **The Chairman:** If there was just one thing you could change to improve the Act, what would it be?

Peter Stanyon: I would remove the two-stage process to registration.

The Chairman: Thank you very much indeed. Thank you very much for coming and sharing your views with us.