FROM:	Audit and Risk Manager	**SUBJECT:**	Electoral Registration
TO:	Chief Executive	**DATE:**	10 July 2018
C.C.	Deputy Chief Executive (AJ)		
	Head of Finance		
	Democratic Services Manager & Deputy Monitoring Officer		
	Electoral Services Manager		
	Portfolio Holder – Cllr. Mobbs		

1   Introduction

1.1   As part of the 2018/2019 Audit Plan an audit has recently been completed on the systems and procedures in place to compile and maintain the council's Register of Electors – Electoral Registration (ER).

1.2   This report outlines the approach to the audit and presents the findings and conclusions arising.

2   Background

2.1   All aspects of ER are undertaken by a small team in Democratic Services which sits within the Chief Executive's service area. The team comprises two full time and two part time staff and is headed by the Electoral Services Manager (ESM). Casual staff, mainly from outside the council, are recruited to undertake the final stage of the annual canvass i.e. making personal visits to properties where there has been no response.

2.2   The whole registration process has changed significantly since 2014 and the introduction of Individual Elector Registration (IER) and it has moved from an entirely paper based system centred on the old Form A to a process where around 90% of activity is carried out either online or by telephone.

2.3   A major change from 2014 has been the verification of the identity of a new elector by the Department for Works and Pensions (DWP). Prior to 2014 the Elections Team was able to enter an elector's name onto the register from a completed paper form or details taken over the telephone. Now the DWP confirms an elector's name, address, date of birth and National Insurance number.

2.4   Likewise when a name is to be deleted from the register confirmation is sought from the person concerned that this is correct. An elector cannot be removed from the register without two pieces of evidence unless information is received from the Registrar through "Tell Us Once" of the death of an elector.

2.5   Over the last few years, prompted in part by the EU Referendum, there has been a lot more interest from the public in all matters political. This has resulted in an increase in the number of people registering to vote which coupled with the expanding population of the District has seen an increase in the team's workload. This has been recognised and plans are place to address the issue.

2.6   Shortly after the formation of WDC in 1974 the number of electors on the register was around 82,000. By 2011 the figure had risen to 99,900 and it currently stands at over 109,000 - an increase of almost 33% since 1974.The rate of increase has been more pronounced since 2011.

3   **Scope and Objectives of the Audit**

3.1   The audit was undertaken to test the management and financial controls in place.

3.2   In terms of scope, the audit covered the following areas:
- Maintenance of the register.
- Information security.
- Risk management.
- Financial performance and budget monitoring.
- Performance monitoring.

3.3   The audit programme identified the expected controls and the possible risks arising from the absence of those controls.

4   **Findings**

4.1   **Recommendations from previous report**
4.1.1   The last report on ER was issued on 26 February 2016 and it contained two recommendations. The responses at the time and the current position are detailed below.

Recommendation	Management response	Current Status

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A repeat duplicate electors test should be resourced at an appropriate juncture so that the results arising can be promptly followed up.	Will seek to run a test later in 2016 in partnership with Internal Audit to utilise their data audit software tools.	Prior to the publication of the register on 1 December each year the system suppliers recommend that one of the standard reports in the system is run to identify potential duplicate electors and this is complied with. Each entry in the report is checked using data from the register and from other council systems. If duplicate entries can be confirmed then the name is removed from the register otherwise it is not removed. All electors to be removed are notified and given an opportunity to respond.
A data quality review should be considered utilising available system reports.	Will be considered as resources permit.	Electoral services works closely with the Council Tax team and the Geographic Information System (GIS) team by comparing data to ensure that there are no duplicate or missing properties. Since 2014 the GIS team has been responsible for adding new properties to the register and for making changes to property details e.g. name or number. The GIS team are responsible for street naming and numbering and so will capture all new properties and conversions as part of the planning process.

4.2   Maintenance of the register

4.2.1   The maintenance of the register is undertaken by the Elections Team using a system called Xpress which is used by many other local authorities. The system is very sophisticated and inevitably complex and the team are learning more and more about it by using it every day. All of the team have been trained in its use and have various reference material to refer to if need be.

4.2.2   With certain audits, and ER is one of them, the question about the existence of a procedure manual is usually asked and it was raised during an

independent review of the Elections Service undertaken by the Association of Electoral Administrators. The preparation and maintenance of a detailed procedure manual requires a huge staff input and it can be to no avail if staff are sufficiently experienced in the job such that they don't need to refer to it.

4.2.3   There is no procedure manual but instead staff can refer to a series of very detailed guidance documents produced by the Electoral Commission (EC) on ER. They cover:

- Planning for the delivery of electoral registration
- Registration framework
- Undertaking the canvass
- Maintaining the register throughout the year and
- Absent voting.

4.2.4   The main source for confirming existing register entries and gathering data on changes is still the annual canvass. Since 2015 the Cabinet Office has been piloting ways to replace the canvass but progress has been delayed due to the result of the EU Referendum. For the foreseeable future the annual canvass will continue. A file containing the latest register is sent to the ERS and from that they print and despatch a form to every address on the register. The form contains a single-use security code which enables an online or telephone response. Alternatively the form can be returned to Riverside House where it is scanned into the system.

4.2.5   During the main canvass period the ERS submit data to the Xpress system where it sits waiting to be actioned and cleared by the ER team. Most of the data will be dealt with fairly routinely by the team after the application of some fairly basic checks. On occasion there may be a need to correspond with an elector if their circumstances do not allow them to be registered e.g. they do not have a National Insurance number.

4.2.6   Any changes to the electors registered at a property are not, as previously, taken on trust. If a new name appears then the person is sent another form which they have to submit online to the DWP in order to confirm their basic details i.e. name, date of birth, NI number and it is not until confirmation is received that their name is added to the register. If a name is removed at a property the person concerned is written to so that they can confirm the situation. These two requirements give a much greater level of confidence in the integrity of the register than previously existed.

4.2.7   Outside of the annual canvass people can register or make changes any time they like as evidenced by the hundreds of thousands of new registrations prior to the EU referendum. People can register online or contact the ER team at any time of the year to start the process.

4.2.8   In recent years the need to be registered in order to be able to vote has received a lot of national media coverage so most people can have no complaints if they find themselves unable to vote. The council undertakes the annual canvass, sends out a separate household notification letter informing people of the entries for their property, undertakes advertising campaigns encouraging people to register and provides a wealth of information and links on the WDC website to assist people with registration.

4.2.9   Part of maintaining the register, and one that will have increasing importance, is the identification of new properties arising from new developments, changes to existing properties, renumbering properties or adding house names. The bulk of any changes will be brand new properties which stem from the planning process which in turn triggers the involvement of the Geographic Information System (GIS) team. They deal with all aspects of naming and numbering of properties for whatever reason and they feed this information into the Xpress system for the ER team to take appropriate action.

4.3   Information security

4.3.1   A paper copy of the full register is available at Riverside House and at Warwick and Leamington libraries for members of the public to inspect under supervision. As the register is subject to constant change a new copy is supplied each month. It wasn't clear whether the old versions were retained, shredded, disposed of confidentially or just thrown away. In order to avoid any potential embarrassment this is an area that should be clarified and if necessary some form of procedure introduced. It is understood that disposal of old versions of the register forms part of the team's review of data as part of the General Data Protection Regulations.

4.3.2   Legislation dictates which organisations are entitled to receive a free copy of the full register. These will include the British Library, the Electoral Commission, WCC, the emergency services and councillors. Electronic access to the register is usually password protected or by upload to the receiving organisation's secure website.

4.3.3   Members of the public are entitled to buy all or part of the edited register on payment of the appropriate fee. There isn't much interest in buying the edited register.

4.3.4   As most of the register transactions are now undertaken electronically the storage and disposal of hard copies is not a major concern. Whenever any forms etc. are received in paper form at Riverside House they are scanned into the system and the originals are later disposed of confidentially.

4.3.5   In order to ensure that the register is always available it must have a number of back-up copies. Backing up the system is undertaken as part of the corporate back up regime. This is covered under one of the ICT audit reviews.

4.4   Risk management

4.4.1   The risks associated with ER are many and will include, amongst others, reputational damage, financial loss and legal challenges. As ER is part of Democratic Services which sits within the Chief Executive's area the risks should be identified in the Chief Executive's risk register and subject to interpretation they are. The CE risk register is largely generic and comprises those risks that will feature in every service e.g. insufficient staff, failure of suppliers, IT failure, loss of data and failure to adhere to legislative requirements all of which will apply to ER.

4.4.2   In addition though there is a separate risk register for ER that is not published and does not form part of the corporate risk register system. This is based on EC guidance and covers a large number of ER specific risks. The register is submitted to the EC on request as part of their performance monitoring work.

4.5   **Financial performance and budget monitoring**

4.5.1   The budget for ER is monitored as part of the corporate budget monitoring procedures by the ESM supported by one of the accountancy assistants in Finance. Despite changes to the management of the register and increases in workload the overall process is basically the same year on year it is relatively straightforward to predict costs.

4.5.2   An examination of the last three complete years' budgets did not reveal any areas of significant over or underspending and in all three years the total net spending was contained within budget.

4.5.3   ER does have some significant items of expenditure such as printing, postages and system support where the requirements of the Code of Procurement Practice apply. In all cases the Procurement Team had been involved and contracts had been dealt with appropriately.

4.5.4   The only source of income for ER is the sale of copies of the register and there is little interest apart from that of the credit reference agencies who by legislation are entitled to buy a copy of the full register and the monthly updates. The five agencies are charged £500 a year which is slightly higher than the fee prescribed but, bearing in mind what they receive in return, it is considered to be a reasonable charge.

4.6   **Performance monitoring**

4.6.1   In many ways the core work of the ER team, i.e. producing the register, is self- monitoring. The register is used for different reasons by a variety of agencies e.g. political parties, emergency and security services, credit reference agencies besides its main purpose of listing people entitled to vote at an election. Any inaccuracies with the register would soon become apparent and be reported.

4.6.2   The EC sets performance standards for both the electoral registration process and conducting elections. At the end of the canvass period the ESM submits a return to them which includes data from the Xpress system and this plays a role in their overall assessment. For the 2017 canvass the EC concluded that WDC did not meet all elements of their performance standards. This was because it had not been able to complete a full canvass as a result of difficulty in recruiting canvassers to undertake personal visits to properties where there had been no response to the initial Household Enquiry Form.

4.6.3   In the same letter to the Chief Executive the EC state "However, while you did not meet this particular element of the standards in full we have made

the decision that you were not deficient in meeting the performance standards for electoral registration as a whole."

4.6.4   In October 2015 the council commissioned an independent review of electoral services from The Association of Electoral Administrators (AEA). The study focused on working practices, the relationship with outside partners, value for money, development of the service and staff resilience.

4.6.5   The review was undertaken by the Chief Executive of the AEA and he reported in January 2016. As far as ER was concerned he recommended that a review of the permanent staffing structure should be undertaken and that a procedure manual should be produced and maintained. The procedure manual point is referred to elsewhere in this report.

4.6.6   The staffing structure recommendation was addressed in a report to Employment Committee on 23 March 2016 and it included a recommendation that a further review of Electoral Services would be undertaken in 2018. This will not now take place because the expected changes in respect of the annual canvass have not come forward from the Government. The review may take place following the May 2019 elections.

4.6.7   The opening paragraph to the conclusion section of the AEA report summarises in glowing terms the reviewer's opinion of electoral services and it would be remiss not to reproduce it here. It states:

> "My overall conclusion from this review is that Warwick D.C. already has in place the necessary arrangements to be considered a well performing authority in terms of the delivery of electoral services. It has demonstrated its ability to provide effective and efficient electoral services. The Council could easily aspire to exemplar status as a model of how to deliver high quality electoral services within the challenging environment now faced by local government."

5   **Conclusion**

5.1   Following our review, in overall terms we are able to give a SUBSTANTIAL degree of assurance that the systems and controls in place in respect of Electoral Registration appropriate and are working effectively.

5.2   The assurance bands are shown below:

Level of Assurance	Definition
Substantial Assurance	There is a sound system of control in place and compliance with the key controls.
Moderate Assurance	Whilst the system of control is broadly satisfactory, some controls are weak or non-existent and there is non-compliance with several controls.
Limited Assurance	The system of control is generally weak and there is non-compliance with controls that do exist.

6   **Management Action**

6.1   No recommendations were found to be necessary on this occasion.

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