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Student Electoral Registration Condition Evaluation

A report of research carried out by IFF Research on behalf of the Cabinet Office.

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Executive Summary

Background and Methodology

The Student Electoral Registration Condition (the 'Condition') came into effect in August 2019. Enforced by the Office for Students (OfS), it requires all higher education (HE) providers in England to cooperate with their electoral registration office (the electoral registration team within their associated local authority) to facilitate voter registration and the general democratic engagement of their students. This is designed to increase electoral registration of students, a group that there is evidence to suggest are historically under-registered at their term-time address.

The Cabinet Office commissioned IFF Research to undertake an evaluation of the Condition, which sought to understand how the Condition is being interpreted and implemented within the sector, and its effectiveness to date. The research was commissioned in Autumn 2019, but due to the 2019 General Election and subsequent COVID-19 pandemic was on pause between December 2019 and August 2020. It entailed:

- A telephone survey of HE provider staff at OfS-registered institutions, who have responsibility for student voter registration. This was initially run in Autumn 2019 (158 responses) and then repeated in Autumn 2020 (171 responses). This report focuses for the most part on responses to the 2020 survey, where FE colleges comprise approximately half the sample, HE providers three in 10, and alternative providers two in 10. While FECs make up the largest proportion of the HE provider population, it is important to note that HEIs have by far the largest proportion of HE students. This has implications when considering the scale of impact that student engagement activities has on the student body as discussed in this report.
- A telephone survey of local authority electoral registration officers (EROs) in December 2020 (177 responses). It should be noted that EROs had less, if any, contact with FECs and so may have only been considering their relationships with HEIs in their responses to the survey. This might account for some inconsistencies detected between HE provider and ERO findings.
- Case studies with eight institutions, which included interviews with relevant provider staff, a students' union representative, the ERO and (in a handful of cases) student focus groups.
- Depth interviews with the OfS and the Association of Electoral Administrators, key stakeholders in the development and implementation of the Condition.

This summary and subsequent report are framed around the four main research questions, and evidence collected for them, which were:

- How is the Condition being interpreted and implemented across the sector?
- To what extent and how are HE providers and EROs cooperating to facilitate student registration?
- What effect has the Condition had on democratic engagement activities?
- What are stakeholders' perceptions of the effectiveness and impact of the Condition?

How is the Student Electoral Registration Condition being interpreted and implemented across the sector?

Awareness of the Condition is generally relatively high across the HE sector: 81% of HE provider staff had heard of the Condition. There was considerable variation by institution type, with higher education institutions (HEIs) much more likely to state they were familiar with its requirements (86%) than further education (FE) colleges (30%) and alternative providers (39%). Typically, HE providers became aware of the Condition via OfS communications, although only two-fifths (41%)

reported that they had actually read the OfS guidance outlining the requirements of the Condition. Among EROs, awareness levels were similarly high, with 90% reporting that they had heard of the Condition (although only 29% reported that they were familiar with its requirements).

Responsibility for responding to the Condition among HE providers varied considerably, both by and within institution type. Most commonly however, it is the responsibility of Student and Academic Services, the Management team, the Registry, or the HE department (particularly in FE colleges).

Integral to the success of the Condition are positive working relationships between HE providers and local authorities. However, nearly half of all providers (47%) reported that they had had no communications with any local authorities.

Where HE providers and EROs were communicating, this tended to occur on average once a term (41%), although 15% communicated at least once a month. There has been little change since the introduction of the Condition in terms of the number of HE providers EROs communicate with (5% reported an increase), or the frequency with which they communicate (13% reported an increase). Nevertheless, a half (50%) of all EROs felt that the Condition had contributed to at least a 'very little' improvement in the quality of those communications. The interviews demonstrated that the Condition tended to reinforce existing relationships between HE providers and EROs (for example, confirming to HE providers that they were doing what was expected of them), rather than lead to new collaborations.

To what extent and how are HE providers and EROs cooperating to facilitate student registration?

HE providers and EROs generally had a positive, collaborative relationship, although there was some evidence of a discrepancy of perspective, with HE providers typically more positive about these partnerships.

An expectation of the Condition is cooperation between HE providers and EROs to facilitate student electoral registration. Typically, this relates to providers sharing student data with local authorities, although at times EROs have requested evidence of HE providers conducting activities to facilitate student registration, and related work. HE providers reported that in approximately half (47%) of their relationships they had been asked to provide information to the ERO in the last 12 months. This contrasted with an equivalent figure of 73% among EROs. There is some evidence that this discrepancy may be linked to the nature of the achieved HE provider sample, which contained a considerable proportion of FE colleges, who were much less likely to report they had been asked to provide information to their ERO. The qualitative findings supported this theory, with EROs reporting that they often focus on larger HEIs in their jurisdiction, as they are responsible for a much larger number of students, and therefore the return on investment is much greater for what can be a quite burdensome process (see Case Study 2 and 3). There has been minimal change in the number of requests for information since the introduction of the Condition. The qualitative findings revealed that while EROs did not typically need to use the Condition as 'leverage' when requesting information from HE providers, they felt reassured that they might be able to use it if they faced resistance from providers.

Both HE providers and EROs were asked whether the HE provider had complied with information requests when made by EROs. While nearly all (97%) HE providers who had received an information request reported they had complied fully, this was somewhat disputed by EROs, of whom only 71% reported that the HE provider had fully complied. There is likely to be an element of social desirability bias affecting the HE provider figure (with respondents providing an answer that does not undermine their work), but the qualitative interviews provided evidence that HE providers may also not have fully understood what was required of them. One ERO described how

providers had supplied information on where their students lived - so considered themselves to be compliant – but many of the addresses did not match the data held by the local authority, nor did they provide National Insurance numbers so the information was not fit for purpose (see Case Study 2). EROs typically stated that a lack of compliance related to HE providers contending that the request was not GDPR compliant, and/or that they did not hold the information being sought.

Just over half of EROs (54%) reported experiencing some form of challenge when dealing with HE providers. However, HE providers reported experiencing challenges in just 29% of relationships with EROs, demonstrating once again a mismatch in interpretation and expectations for the ERO-HE provider relationship. Challenges in the general relationship between HE providers and EROs typically related to poor communication. Of particular note, a small proportion of EROs noted that they struggled to identify the relevant individual at the HE provider. Nevertheless, a majority of HE providers and EROs held a positive view of their relationship with one another. EROs reported that over three-quarters (78%) of their relationships with HE providers were 'effective' (78%) compared to an equivalent figure of 69% among HE providers. HEIs were more likely to consider their relationships with local authorities effective than FE colleges (81% vs. 55%). Positively, HE providers' relationships with local authorities had also improved since 2019, with a rise of 12 percentage points in the proportion considering the relationship effective (from 57% to 69%).

What effect has the Condition had on democratic engagement activities?

The majority of HE providers believe their institution is proactive with regards to student electoral registration (73% agreed with this statement), and in terms of encouraging students' democratic engagement (86%). Higher education institutions typically rated themselves as more proactive than both FE colleges and alternative providers. Nevertheless, there is no real way of discerning how impactful provider practices are: only 20% actually monitor student electoral registration numbers, while the extent to which EROs monitor this varies.

The vast majority (88%, rising to 98% of HEIs) of HE providers have undertaken activities to facilitate electoral registration. The three most common were: providing a link to the government's register-to-vote website, typically during enrolment (78%); sending tailored messages to students on the importance of electoral registration (74%); and working with the student body to promote registration (68% - this of course could lead to a much wider array of activities). There is a clear relationship between the scale of activity being undertaken and awareness and familiarity with the Student Electoral Registration Condition. Providers who were familiar with the Condition were much more likely to have undertaken more activities (86% who were familiar had done three or more compared to 59% who were less familiar, and 63% who had never heard of it). Similarly, nearly all providers who had read the associated OfS guidance had undertaken activity (96% compared to 83% of those who had not). Across the range of activities offered, between a third and two-thirds of providers thought that the Condition had influenced at least to some extent the introduction of these activities. EROs did not feel the impact of the Condition had been quite as significant on activity delivery: 50% thought it had contributed at least in some way, but only 6% said to a great extent, and a fifth 'somewhat'. In qualitative interviews, a provider noted that the introduction had changed their approach to electoral registration from more 'seasonal' (i.e. only around election periods) to year-round (see Case Study 5). An ERO described the uneven spread of student electoral registration as one of their key challenges, often having to process thousands of student registrations in the days leading up to an election.

Only one quarter of HE providers (23%) had embedded voter registration within student enrolment forms. However, when asked which activities were considered to have had most impact on student registration, providers were more likely to point to this activity than any other: 50% of providers (who offered this) reported it had had the greatest impact; the next most common activity was an

event or programme designed to promote electoral registration (29%). The efficacy of embedding voter registration in enrolment was echoed in qualitative findings where respondents described how it was a good opportunity to capture students while they were filling out other documentation such as for student loans and course enrolment (see Case Study 2).

Around two-thirds (64%) of HE providers who had undertaken any activity believed that their activities would be effective at increasing the number of students on the local Electoral Register, while 85% thought they would promote the importance of student electoral registration more generally. Providers who felt that the introduction of the Condition had been burdensome for their provider (see next section) were also less likely to agree that their activities would be effective in increasing the number of students on a local Electoral Register (42%). This could suggest that providers that had significantly changed their approach in response to the Condition were less confident in the efficacy of the activities they had undertaken.

The COVID-19 pandemic has had a considerable impact on the HE sector, with most delivery moving online. Just under three-fifths of providers (59%) said that COVID-19 had impacted their recent or future plans to facilitate student electoral registration. Qualitative feedback emphasised the impact of promotional campaigns needing to migrate online meant they were less likely to 'cut through' other online communications.

What are stakeholders' perceptions of the effectiveness and impact of the Condition?

EROs were asked how well they felt the Condition was working well as a policy. Overall, a third (33%) agreed that it was, while around two-fifths were relatively ambivalent (43% answered 'neither agree nor disagree').

Views on the impact of the Condition on student electoral registration numbers was relatively mixed; this is likely in part because many do not measure these so have little evidence to signpost the Condition's impact. Around half (51%) of EROs felt that the Condition had contributed to an increase in the number of students registered to vote in their area, although only 22% felt it had contributed more than 'a little' increase. Around a half of HE providers (53%) and EROs (46%) felt that the Condition will continue to have an impact on student registration numbers.

In all new policy areas and aspects of regulation it is important to determine whether the benefits outweigh the additional regulatory burden. Only a fifth (21%) of HE providers felt that the introduction of the Condition had been burdensome for them, indicative of the relationship many providers already had with their local authority, and that the additional work created via the Condition was relatively minimal.

Conclusions

Overall, amongst both the HE and ERO sectors, there was a high level of awareness of the Condition, and views on it were generally positive or neutral. While the impact has proven limited so far, with many respondents reporting that data sharing and promotional activities were already in place (such as in Case Studies 3 and 4), it has encouraged greater awareness and formalised change in some providers (see Case Studies 1 and 5). Evidence suggests that it is seen by EROs as being a useful tool if needed to encourage compliance.

For many HE providers, the Student Electoral Registration Condition simply legislates for actions already being conducted regarding the facilitation of student voter registration. Nevertheless, there was evidence of a minority of HE providers misinterpreting what constitutes 'compliance' with the Condition with cases of EROs not receiving data in the correct format or lacking key information such as National Insurance number. Indeed, the ERO perspective demonstrated that a small

proportion of providers were not fully complying with the legislation. This lack of compliance – even among a minority – thus justifies the Condition’s existence, and EROs reported feeling reassured that they could use the Condition as leverage should HE providers not comply with requests. Supporting this, while the amount of communication between HE providers and EROs only increased slightly since the Condition’s introduction, a far greater proportion of EROs noted an improvement to the quality of those communications, suggesting that the Condition is changing attitudes among some within the HE sector.

A key finding from the research is the disparity of experience and attitudes across provider groups. EROs appear much more likely to target communications at HEIs, which are responsible for the large majority of the student body. FE colleges and alternative providers are less aware of the Condition, less proactive with regards to encouraging student voter registration, and considered their relationship with their ERO less effective than HEIs.

The study did not set out to explore the impact of the Condition on student voter registration, and indeed it would be difficult to achieve this as this information is rarely collected or monitored. Furthermore, the COVID-19 pandemic has caused upheaval in the sector, which is affecting the way HE providers communicate with their students. However, there is some evidence to show that the Condition has contributed to an increase in the range of activities encouraging students to register to vote, which should have a positive impact on registration numbers. Participants in the qualitative interviews, even where they had not seen much change as a result of it, were also almost universal in supporting the introduction of the Condition. There was a general feeling in a lot of cases that the sector was moving in the right direction, but that it may take time before significant impact is evident in terms of increasing the number of students on the Electoral Register.

Background and Methodology

Background

In August 2019 the Student Electoral Registration Condition (the “Condition”) came into effect. It is one of up to 24 (depending on the registration category) ongoing conditions of registration to the Office for Students (OfS) that registered higher education providers in England must satisfy at the time of registering and continue to meet in order to stay registered. Conditions of registration are the primary tool that the OfS uses to regulate individual higher education providers.

The Condition stipulates that the provider must comply with guidance to facilitate, in cooperation with electoral registration officers, the electoral registration of students.¹ The guidance sets out the requirements, namely that registered providers that have students who are eligible for electoral registration:

- are required to comply with requests for information from Electoral Registration Officers (EROs)
- must ensure that they understand their duty to comply with such requests
- should cooperate and work effectively in partnership with EROs to facilitate the electoral registration of students
- consider how they can most effectively cooperate with EROs

In line with OfS’ approach to regulation, their attention will be focussed on providers where issues have been raised that suggest a registered provider may not be meeting their requirements. Including this registration condition for providers was a means of raising awareness amongst interested parties of the existing legislative requirement to comply with EROs’ requests for data (as contained in regulation 23 of the Representation of the People (England and Wales) Regulations 2001).

While not a formal condition of registration, the guidance also suggests that providers could go beyond the requirement and more proactively raise awareness and promote democratic engagement and electoral registration. It also provides examples of good practice that providers may wish to consider when determining their approach to electoral registration.

Keen to understand how the Condition was working in practice, the Cabinet Office commissioned IFF Research to conduct an evaluation of knowledge and perceptions of the condition, along with what steps providers have taken to implement the Condition in practice.

Aims and objectives

The overarching aim of the study was to understand how the introduction of the Student Electoral Registration Condition is being interpreted in the sector, and the effectiveness with which higher education providers are working with Electoral Registration Officers to ensure that voter registration amongst students is being effectively facilitated.

The research was designed to address the following questions, which also form the structure of this report:

¹ The guidance was written in September 2018, but came into effect in August 2019
<https://www.gov.uk/guidance/guidance-to-facilitate-electoral-registration-of-students>

- How is the Student Electoral Registration Condition being interpreted and implemented across the sector?
- To what extent and how are HEPs and EROs cooperating to facilitate student registration?
- What are stakeholders' perceptions of the effectiveness and impact of the Student Electoral Registration Condition?
- Do the current guidelines and Condition encourage HEPs to undertake democratic engagement activities? What are the type and scale of democratic engagement activities taking place to facilitate student registration?

Methodology

The research was commissioned in Autumn 2019, but due to the 2019 General Election and subsequent COVID-19 pandemic was paused between December 2019 and August 2020. It entailed:

- A telephone survey of HE provider staff with responsibility for student voter registration. This was initially run in Autumn 2019 (158 responses) and then repeated in Autumn 2020 (171 responses).
- A telephone survey of Electoral Registration Officers (EROs) in December 2020 (177 responses).
- Case studies with eight institutions, which included in-depth interviews with relevant provider staff, a students' union representative, the ERO, and (in a handful of cases) student focus groups. These took place during February-March 2021.
- Two in-depth interviews with stakeholders (OfS and the Association of Electoral Administrators) involved in the development and implementation of the Condition, providing contextual information and a holistic view of implementation.

Due to the incomplete nature of fieldwork in 2019 (with only the HE provider strand partially completed), this report will focus mainly on results from 2020/21. There are, however, instances where drawing comparisons between HE providers' results from 2019 and 2020 helps in answering the research objectives. Where this is the case, it has been made clear in the narrative that results have been drawn from 2019 data.

Quantitative surveys audiences

Higher Education Providers

Higher education providers in England are a diverse set of organisations. As such, providers have been categorised into three broad categories (all under the umbrella term of higher education [HE] providers):

- **Higher education institutions (HEIs):** Used to describe publicly funded organisations with degree awarding powers, mostly encompassing the larger universities of the country.
- **Further education colleges (FECs):** While mostly focused on further education, FECs can also offer and award degree level qualifications. As such, many are registered to the OfS and are subject to its conditions of registration.
- **Alternative providers (APs):** These providers are mostly private limited companies, with particular subject areas, that have degree awarding powers

As shown in the table below, across all three audiences we achieved 171 CATI responses in 2020, with fieldwork occurring between 7th October – 30th November 2020. In the previous year fieldwork occurred between 8th October – 5th November 2019, resulting in 158 responses.

Table 1.1: Quantitative responses

Provider type	Number of respondents	
	2020	2019
Higher education institutions	49	71
Further education colleges	91	54
Alternative providers	31	33
Total	171	158

The higher education provider survey was targeted at the individual within an organisation that had overall responsibility for facilitating student electoral registration in the provider. Responsibility varied across institutions, but was most likely to lie within the Student and Academic Services departments.

Electoral Registration Officers

Electoral Registration Officers (EROs) are local authority staff with responsibility for overseeing electoral registration activity in their area. In total, 177 EROs completed the telephone survey, representing 52% of local authorities in England. Fieldwork occurred between 1st – 18th December 2020.

The EROs surveyed were generally experienced in their role. The vast majority (89%) had worked in the area of electoral registration for five or more years, and 77% had worked at their current authority for five or more years.

Qualitative case studies audiences

The evaluation utilised in-depth qualitative case studies to provide a more detailed and rounded sense of experiences relating to the Condition, and how these fed through to student-facing activities. They included interviews with relevant provider staff, a students' union representative, the ERO and (in a handful of cases) student focus groups.

A number of higher education providers were selected based on their quantitative survey responses to ensure that there was a representative spread among provider types and regions. Awareness of the Condition and approach to student electoral registration were also considered to ensure diversity of opinion. Case study fieldwork occurred between February 2nd – March 22nd 2021.

Individual case study summaries are located in this report's appendices, however findings have also been incorporated with quantitative findings in the main body of the report. Respondents asked for different levels of attribution, so in some cases generic terms are used to ensure the anonymity of respondents is retained. A full breakdown of the audiences that took part in each case study can be found in the introduction to the appendices.

In addition to case studies, two depth interviews with wider stakeholders were conducted. These interviews were largely to broaden the understanding of the regulatory environment and contextual factors, so will they not be reported on as standalone elements of the research.

Limitations

There are some limitations to the research and contextual factors that should be considered when examining the findings in this report:

- Higher education providers employ large numbers of staff and the lead that has responsibility for facilitating electoral engagement may vary, or be split across multiple roles. As such, some HE provider staff may not be aware of all of the interactions with local authorities or with electoral engagement activity, and thus findings should not be treated as a true reflection of all activity that is occurring in the sector.
- The profile of higher education providers across England should be considered. While higher education institutions (HEIs) have by far the largest proportion of HE students, further education colleges (FECs) make up the largest number of providers, though the number of HE students studying there is relatively low. This was reflected in the breakdown of providers that took part in the survey: in 2020 over half (53%) of providers that responded were FECs. In 2019, a higher proportion of providers that took part were HEIs (45% compared to 29% in 2020) – this contributes to difficulties being able to robustly compare 2019 and 2020 findings. Readers should note that findings referring to HE providers are therefore not representative of the sector.
- In qualitative interviews, it seemed that EROs had less, if any, contact with FECs and so may have only been considering their relationships with HEIs in their responses to the quantitative survey. This might account for some inconsistencies detected between HE provider and ERO findings.
- In 2020, all fieldwork took place during the COVID-19 pandemic. HE providers largely closed down at the end of academic year 2019/20, and teaching was mostly delivered remotely in 2020/21 with few students on campuses. Most staff in providers and in local authorities also began to work remotely. This meant that providers' priorities were likely to have moved to adapting to the new landscape, and planned activities surrounding democratic engagement may have been cancelled, moved, or adapted. The HE provider view on how their democratic engagement activities were impacted by the pandemic is explored later in this report.
- Case study fieldwork took place in the build-up to 2021 local elections. This made recruiting EROs for the case studies particularly difficult, as few had the resource to participate. This was further compounded by COVID-19, as ensuring that elections could be held in line with public health requirements was more resource-intensive as compared to a business as usual situation. As such, some of the case studies presented at the end of the report lack the ERO perspective. Each case study makes it clear which audiences contributed to the findings.
- Recruitment for student focus groups were also impacted by the COVID-19 pandemic. With students largely studying remotely, it was difficult to work with providers to recruit suitable groups. This, compounded by the upcoming pre-election period for local elections, means one of the planned focus groups did not go ahead, meaning the student view is slightly less represented in this research study than planned.
- Only a fifth of providers surveyed (20%) monitored or recorded electoral registration. This meant that a lot of the provider perspectives were fairly anecdotal or subjective, and makes it difficult to draw concrete conclusions on the impact of the Condition on increasing the numbers of students registered to vote.

Despite these limitations, the study still offers valuable insights on the sectors' current views of the Condition and its implementation, and more generally their experiences with student electoral registration issues.

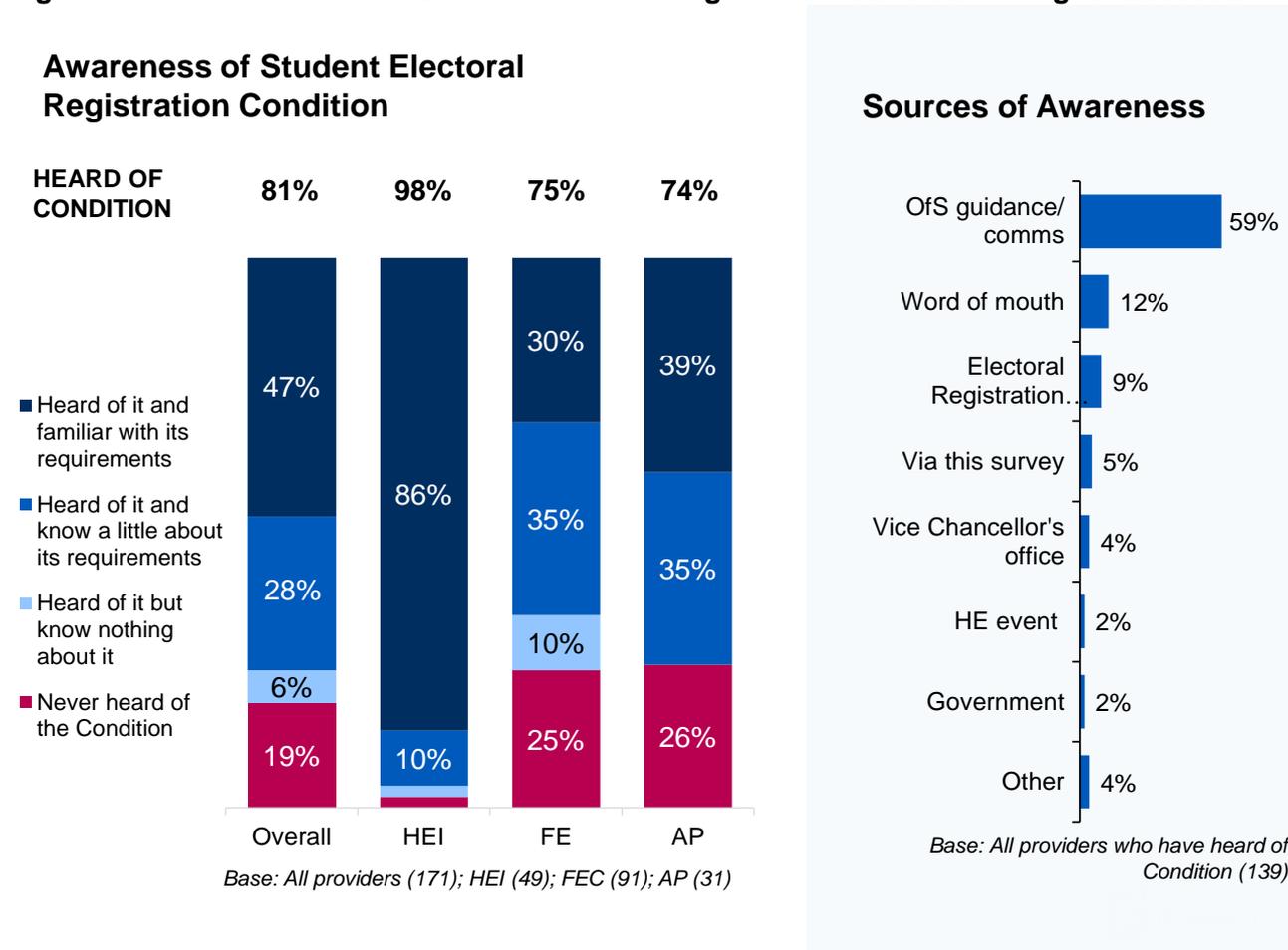
How is the Student Electoral Registration Condition being interpreted and implemented across the sector?

Awareness of the Student Electoral Registration Condition in the Higher Education sector

Awareness of the Student Electoral Registration Condition (“Condition”) is generally relatively high across the HE sector: most higher education providers (81%) had heard of the Condition. Higher education institutions demonstrated much greater levels of awareness and understanding than further education colleges and alternative providers. As shown in Figure 2.1 below, 86% of higher education institutions had both heard of the Condition and were ‘familiar with its requirements’ compared to just 30% of further education colleges and 39% of alternative providers.

While overall awareness has remained consistent since 2019 (where 78% had heard of the Condition), there are indications that awareness has indeed improved. In 2019 the survey sample contained more HEIs than other provider types, however, in 2020, FE colleges (which are generally less aware of the Condition) were the most predominant provider type and therefore serve to reduce the overall awareness measure. Indeed, at a ‘provider type’ level, awareness levels have increased in both HEIs (93% to 98%) and FECs (63% to 75%) since 2019 (there has been no change among APs).

Figure 2.1: Awareness of the Student Electoral Registration Condition in higher education



This chart also shows how higher education providers first became aware of the Condition. As illustrated, and as would be expected, Office for Students (OfS) guidance had a strong role to play in raising awareness, with 59% of those who had heard of the Condition reporting that they found out about the Condition via OfS communications. Word of mouth (12%) and local authority communications (9%) also played an important role for some.

Beyond the initial communications and accompanying guidance that the OfS sent to higher education providers when the Condition was introduced, there has been little further contact from them on this subject. A handful of providers noted that they had had an email or letter exchange with the OfS, or seen information in a 'general circular', but this amounted to a small minority.

There is evidence that the sector is not fully engaged with OfS guidance on the Condition, and it is possible that this could lead to a misinterpretation of its requirements and/or a dilution of its effects on the practices of the sector in relation to encouraging student voter registration. Two-fifths (41%) reported that they had read the OfS guidance themselves, while 26% stated that they were aware of the guidance but had not read it personally, and a further 33% were not aware of OfS guidance. Once more there was considerable discrepancy in terms of provider type, with higher education institutions much more likely to have read the guidance themselves (73% compared with 27% of further education colleges and 29% of alternative providers).

Most providers involved in qualitative interviews believed they had a good understanding of the Condition and its requirements, having learned of the Condition through OfS communications. They understood that they had an obligation to comply and regarded it in the same light as other conditions for registration to the OfS. That said, one did note that the specificity of the Condition made it stand out from the others that they saw as more principles-based (see Case Study 2). HE providers largely believed that the requirements were clear, and that the associated guidance provided useful 'real world' examples for them to draw on (see Case Study 5).

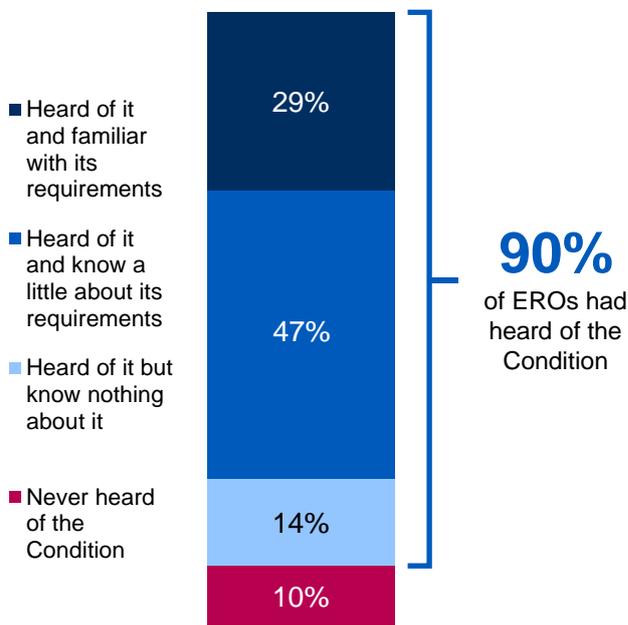
Awareness of the Student Electoral Registration Condition among local authorities

Awareness of the Condition was similarly high among local authorities. Nine in ten (90%) Electoral Registration Officers (EROs) had heard of the Condition, although relative to the HE sector, an understanding of the Condition's requirements was somewhat lower: only 29% reporting familiarity with its requirements (this compared to an equivalent figure of 47% among higher education providers), as shown in Figure 2.2.

EROs typically learned of the Condition via one of two channels, the Association of Electoral Administrators (AEA: 60%), and the Electoral Commission (25%).

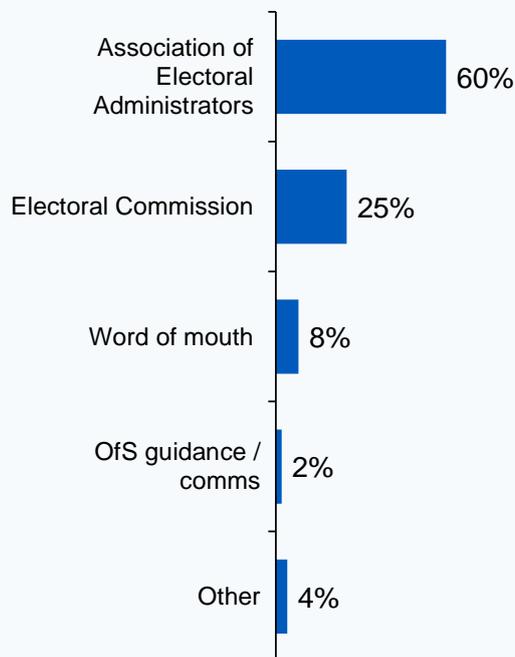
Figure 2.2: Awareness of the Student Electoral Registration Condition among Electoral Registration Officers

Awareness of Student Electoral Registration Condition



Base: All EROs (177)

Sources of Awareness

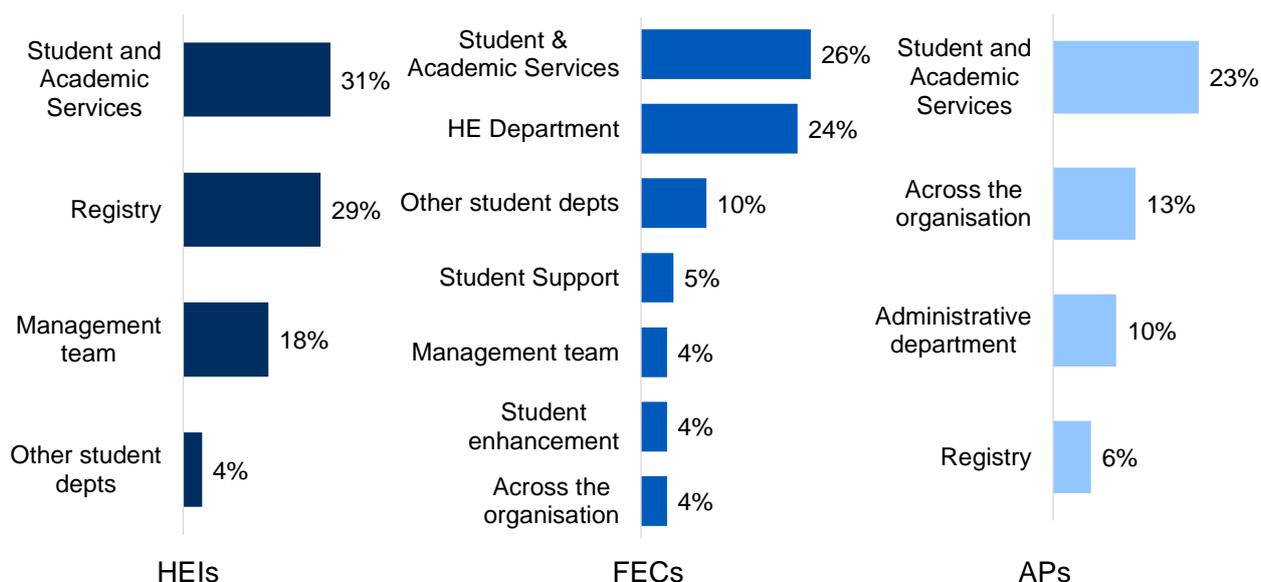


Base: All EROs who have heard of Condition (159)

Structure for administering the Student Electoral Registration Condition

Reflecting the variety of administrative structures within higher education providers, there is no consistent or singular approach they take in managing the requirements of the Condition. Nevertheless, there are some patterns of note across different provider types. As Figure 2.3 shows, responsibility is marginally most likely to lie within the Student and Academic Services departments across all provider types (between 23% and 31%). However, in higher education institutions the Registry often undertakes this responsibility (29%) while in further education colleges, the HE department (24%) also leads this work. In alternative providers, responsibility appears even more dispersed, with a relatively high proportion citing that all departments had some responsibility (13%) though a low base size here (just 31 APs) means this finding should be treated with caution.

Figure 2.3: Most common departments where responsibility for responding to Condition is held, by provider type



Only departments with minimum 4% response shown

Base: All providers: HEI (49), FEC (91), AP (31)

There is evidence as well that responsibility is not simply siloed to one individual. For example, three-quarters (73%) have shared guidance documentation relating to the Condition with colleagues.

While higher education providers typically take responsibility for liaising with local authorities and providing information as required, much of the work done to encourage students to register to vote is undertaken by the students' union or similar student body. Indeed, four in five (81%) higher education providers reported that they work with their student body on the issue of student electoral registration. Notably this has risen from 70% since 2019, perhaps because the intervening period has contained a General Election (in December 2019), which may have contributed to a prioritisation of voter registration among student bodies.

Relationship between higher education providers and local authorities

Extent of communication between higher education providers and local authorities

On average, HE providers were typically only covered by one or two local authorities (median of 1 and mean of 2), although this number was slightly higher among HE providers, who were more likely to have a higher number of geographically dispersed campuses. Nearly half of all provider staff (47%) reported that they had had no communications with any local authorities. While this is not necessarily in itself a negative flag, it suggests there is an element of risk if a local authority wishes to quickly access the data it needs, if there is not an established relationship with the HE provider.

Around half (56%) of all EROs had communicated with HE providers in their area in the last 12 months regarding matters relating to the Condition. Approximately one in seven (15%) reported that they would expect to communicate with providers but had not, while the remainder (27%) had not, and would not expect to, communicate with providers (likely because there was little by way of HE provision in their area).

Type and frequency of communication between provider staff and Electoral Registration Officers

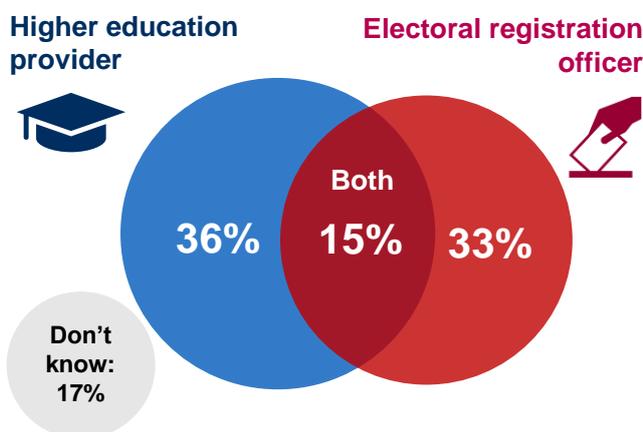
Provider staff were asked a series of questions about their dealings with EROs. Where their institution came under the jurisdiction of two or more local authorities they were asked those questions (separately) for the two local authorities they had the most dealings with. The analysis in this section focuses on the combined responses to both sets of questions. In a similar vein, Electoral Registration Officers whose local authority covered more than one higher education provider were asked to respond to questions focussing on the two providers with whom they had the most dealings.

The survey explored how communications between provider staff and Electoral Registration Officers were instigated. Findings were mixed: a third (33%) of interactions were led solely by the ERO, a slightly higher proportion by the provider staff (36%). Around one in seven (15%) reported it was a bit of both. While there are positives in both types of organisations taking ownership of communications, this does suggest a risk that – especially where HE providers and local authorities are not already communicating – neither believe it their responsibility to instigate this communication, and therefore neither taking the initiative to start communications. The vast majority (67%) of interactions occurred via email with only a handful occurring by phone or face-to-face.

Typically, provider staff and EROs communicate at least once a term (41%), although as Figure 2.4 shows two in five communicate less regularly than this. There has been little change since the introduction of the Condition in terms of the number of higher education providers EROs communicate with (5% reported an increase), or the frequency with which they communicate (13% reported an increase).

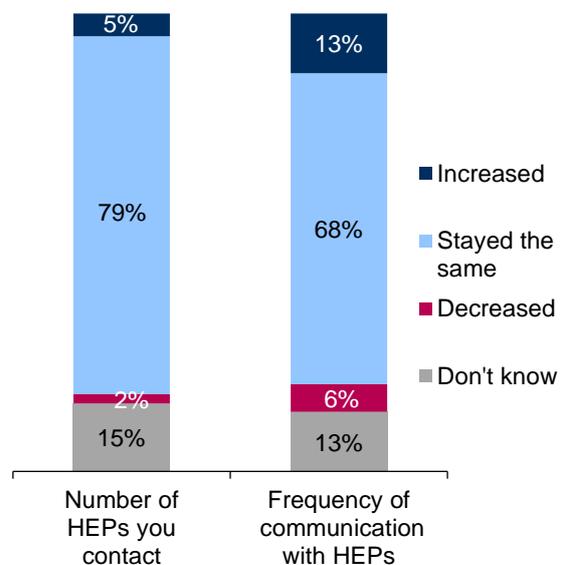
Figure 2.4: Communication between higher education providers and Electoral Registration Officers

Who instigates communication?



Base: All relationships: provider view (123)

Contact with Higher Education providers since Condition introduced



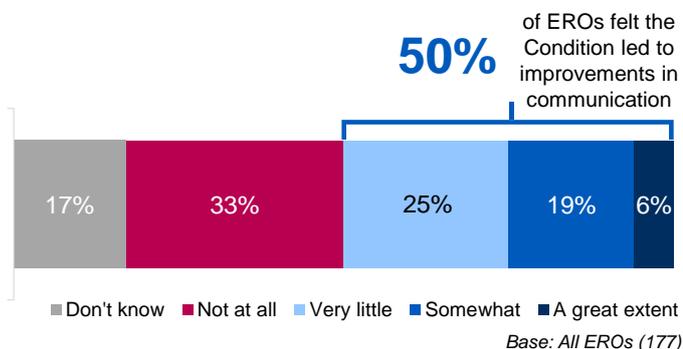
Base: All relationships: ERO view (147)

Despite only minimal changes in the volume of communication between EROs and higher education providers since the Condition was introduced, there was evidence that indicated the quality of communications had improved as a result of the Condition.

As shown in Figure 2.5, a half (50%) of all EROs reported that the Condition had contributed to at least a 'very little' improvement in communications with higher education providers.

Qualitative interviews supported the finding that, for many, the introduction of the Condition had not altered the frequency of communications. A few of the providers already had pre-existing relationships with EROs, and the Condition acted more as confirmation that they were doing the right thing, rather than prompting change. There was however one example of a provider actively seeking a relationship with their local ERO as a direct result of the Condition (see Case Study 1). After becoming aware of the Condition, the HE staff member arranged a meeting with the ERO to build a relationship and to explain the institution's approach to electoral registration. Since then, communications have largely concerned the sharing of student data through the JISC system.

Figure 2.5: Extent to which EROs saw an improvement to communications with HE providers due to the Condition



Content of communications

Provider staff were asked whether the Condition was discussed in communications with EROs. In two-thirds (64%) of relationships between the two there was regular discussion on matters relating to the Condition and most resulted in actions taken by provider staff. In three in 10 relationships (30%) the Condition had not appeared in conversations.

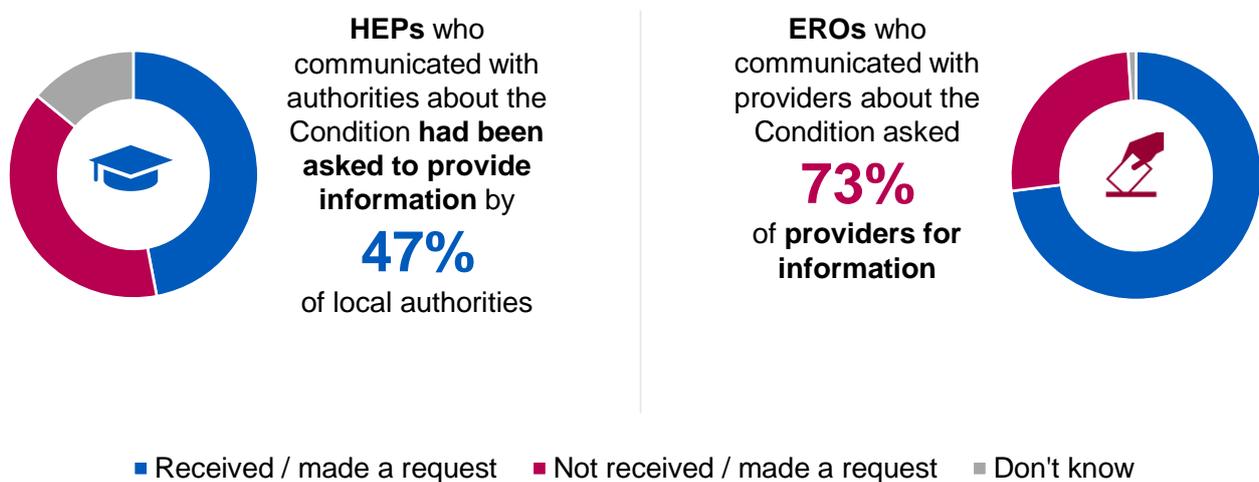
To what extent and how are HE providers and EROs cooperating to facilitate student registration?

Requests for information between Electoral Registration Officers and higher education providers

An expectation of the Condition is cooperation between HE providers and EROs to facilitate student electoral registration. As part of this cooperation, providers are expected to comply with requests for information from EROs. Requests for information can take the form of sharing data between these organisations, for example on where students are living, or evidence that higher education providers are acting in accordance with the Condition.

In approximately half (47%) of relationships between HE providers and EROs, HE providers reported that they had been asked to provide information to the local authority in the last 12 months (this equated to 20% of all HE providers). There was little change between 2019 and 2020. EROs were asked a similar question, reporting this occurred in 73% of relationships, as shown in Figure 3.1.

Figure 3.1: Requests for information in the last 12 months

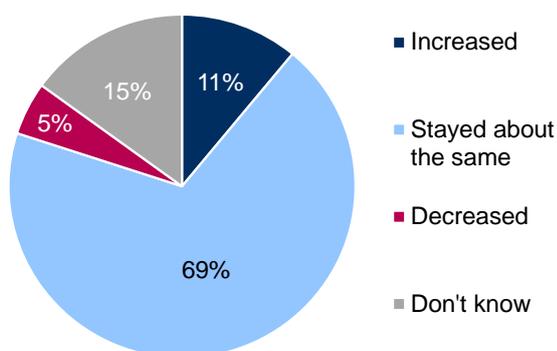


Base: All identified local authorities HEPs communicate with about SERC (79), All HEPs EROs communicate with about SERC (147)

The discrepancy between HE providers and EROs may well be linked to the nature of the achieved HE provider sample, which contained a considerable proportion of further education colleges; the evidence suggests that EROs were less likely to focus on further education colleges especially where their student numbers were quite low. For example, the 47% figure previously cited rises to 61% among HEIs and drops to 20% among FECs. This was supported by the qualitative findings, where EROs reported that their focus was on the larger HEIs in their jurisdiction, largely because with limited resources, they had to focus on providers with the larger numbers of students. One ERO did note that they were unaware of which FECs within the authority would fall under the Condition, but also assumed that with the makeup of students (i.e. living locally and unlikely to be living in student accommodation), they would be captured by their usual electoral registration activities (see Case Study 2).

The most common requests that were made of providers were around the sharing of student data, entailing the set-up of data transfer agreements and the actual transfer of data. EROs reported that 96% of their requests for information related to accessing student data. Other requests were far less common, with the following all accounting for less than one-fifth of requests: the proportion of students registered to vote; a record of activities the HE provider had undertaken to facilitate student registration; an amendment to the registration process; evidence of communication with students not registered on the Electoral Register.

Figure 3.2: EROs requests for information since the introduction of the Condition



Bases: All EROs (177)

The impact of the Condition on the number of requests made by EROs appeared relatively limited. Only one in nine (11%) EROs reported that they had made more requests for information since the Condition was introduced, while seven in ten reported no change in information requests (69%).

For many who saw no change, this is likely because they already had strong relationships with HE providers prior to the Condition being introduced, as evidenced by the qualitative findings described in the previous chapter.

Despite this, there is evidence that the Condition was helpful to electoral registration officers who made requests for information. There were few specific examples of EROs using the Condition as 'leverage' when requesting information from providers. EROs largely welcomed the Condition though, and mentioned that it may be useful to use in the future if a provider was being particularly resistant in providing information. One ERO described how they had received a better response from providers when they had included reference to the Condition in their communications:

“At the last canvass, we requested the data from the universities and they either ignored the letter or they asked for a data sharing agreement. Those that didn't respond at all, of which there were many, we sent another letter recorded delivery so we know someone had to sign for it, and the response we got was much higher. Within that letter it explained the requirement of the legislation and that they have a duty to respond. We did get a better response from that.”

Electoral Registration Officer

A wider stakeholder could only recall one specific example of the Condition being used as leverage, but did describe how the ERO citing the requirements of the Condition had led to a significant improvement in the relationship between the provider and the local authority.

Higher education providers' compliance with requests for information

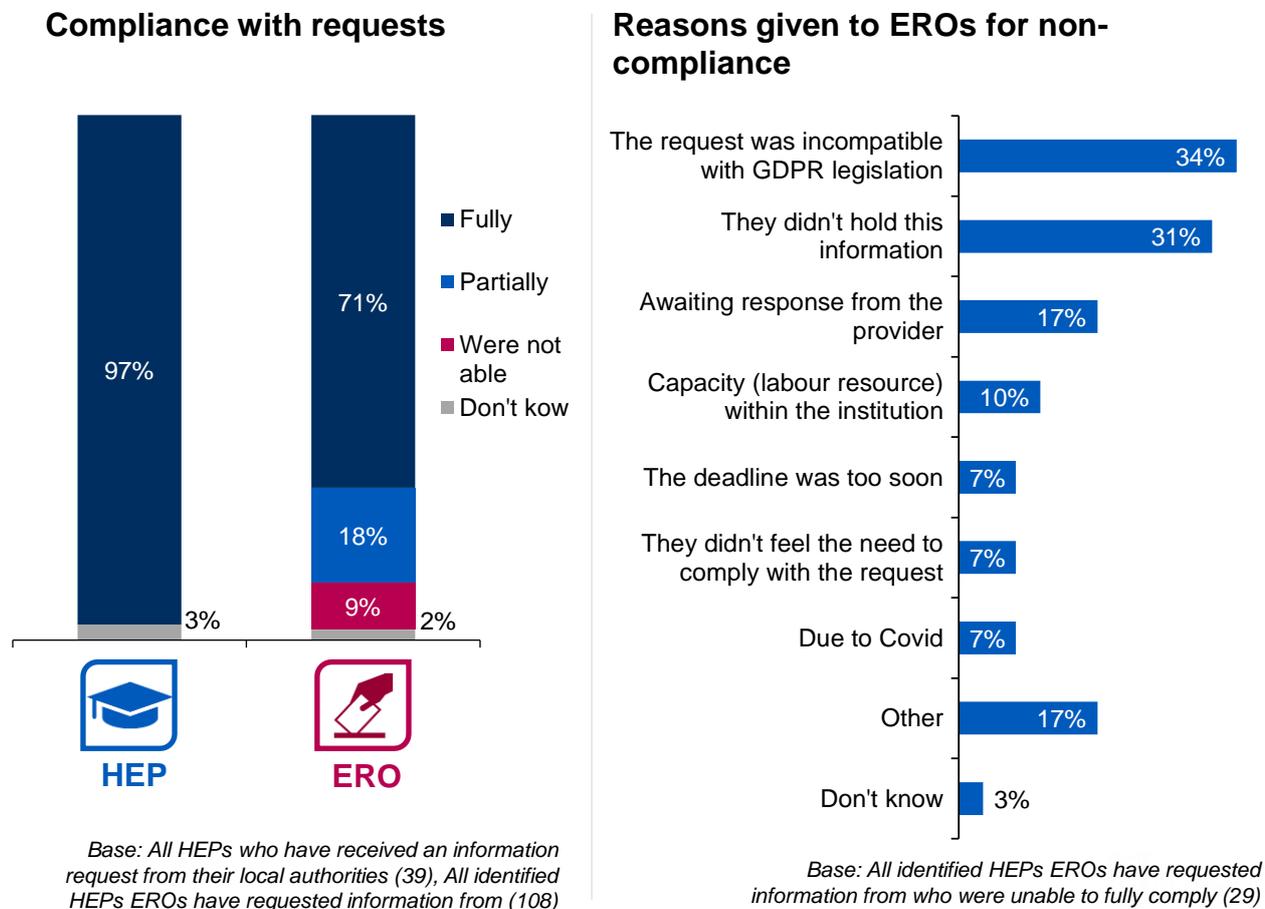
Higher education providers felt they had fully complied with nearly all (97%) of the requests for information that they had received from EROs. This showed no change from 2019 (98%).

EROs on the other hand did not reflect so positively on HE providers' level of compliance. Around seven in 10 (71%) reported that providers fully complied with their information requests, but 18% reported partial compliance, and 9% reported that the provider was unable to comply at all, as shown in Figure 3.3.

The most common reasons given for not complying were (please note low base of 29):

- the request was incompatible with GDPR legislation (34%)
- providers did not hold this information (31%); and
- EROs were still awaiting a response from the provider (17%)

Figure 3.3: Level of compliance and reasons for non-compliance



EROs who had heard of the Condition and were fully aware of its requirements were more likely to report that providers had fully complied with the requests than on average (81%), perhaps suggesting that some of the reports of partial or no compliance are related to an uncertainty in the actual requirements of the Condition. The much higher HE provider figure could also be explained by social desirability bias, with respondents taking care to provide an answer that does not undermine their work.

There was some indication in qualitative interviews that there is a divergence of views between HE providers and EROs in terms of what constitutes 'compliance'. One ERO described how providers will send student data and assume that they are fully complying, however often the data may not be in the correct format or contain the information that the ERO needs to perform their duties; specifically they cite the lack of National Insurance numbers, and student addresses (particularly student halls) not matching their records (see Case Study 2).

Challenges in the relationship between HE providers and Electoral Registration Officers

EROs and HE providers were asked if they faced any challenges in their relationship with one another. In a similar vein to the discrepancies around perception of compliance, EROs were more likely to report a challenge in their relationship with HE providers than vice versa. As can be seen in Figure 3.4, just over half of EROs (54%) reported experiencing some form of challenge when dealing with HE providers. HE providers reported experiencing challenges in just 29% of relationships with EROs, however it should be noted that HE providers were only answering in the context of the EROs that they had identified relationships with. There may have been an element of social desirability bias (with respondents providing an answer that does not undermine their work), or self-selection bias (where those with a positive relationship with their ERO were more likely to agree to take part in the survey).

Figure 3.4 also shows the most common challenges each faced when engaging each other. For both HE providers and EROs the most common challenges related to difficulties around communication. Just under one in 10 (9%) HE providers cited this (the most common challenge for HE providers), while the two most common challenges cited by EROs were that the provider was not very responsive (21%) or that they had difficulty identifying the correct person to speak to at the provider (20%). This latter challenge links into the varied structures employed by HE providers for overseeing student electoral registration, as noted in the previous chapter. HE providers reported facing a similar challenge when engaging EROs.

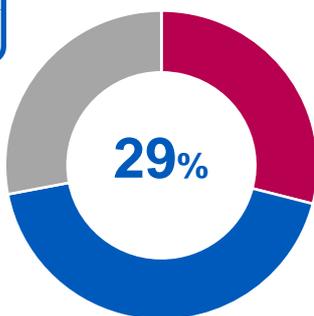
A small proportion of EROs also highlighted a lack of understanding of providers' legislative requirements (12% - suggesting more work can be done to raise awareness among providers), and that they found HE providers disinterested in their responsibilities around student registration (9%), suggesting again that either greater awareness, or more enforcement would support engagement. Both were just as likely to cite GDPR-related concerns as a barrier to co-operation (7% HEPs and 11% EROs).

Figure 3.4: Challenges cooperating between HEPs and EROs

Rate of challenges



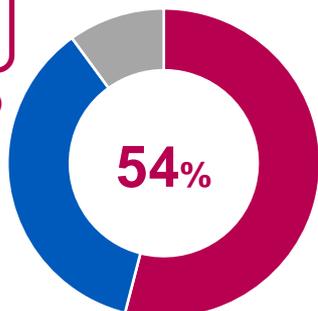
HEP



Of HEPs have faced a challenge cooperating with EROs



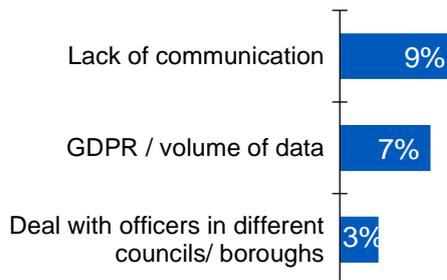
ERO



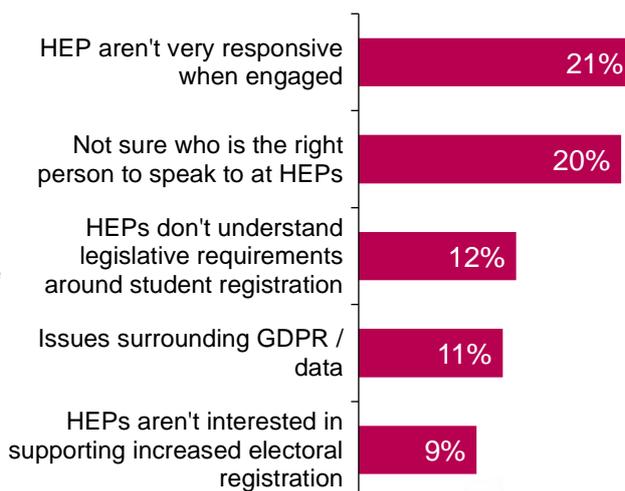
Of EROs have faced a challenge cooperating with HEPs

- Challenge
- No challenge
- Don't know

HEP's Most Common Challenges



ERO's Most Common Challenges

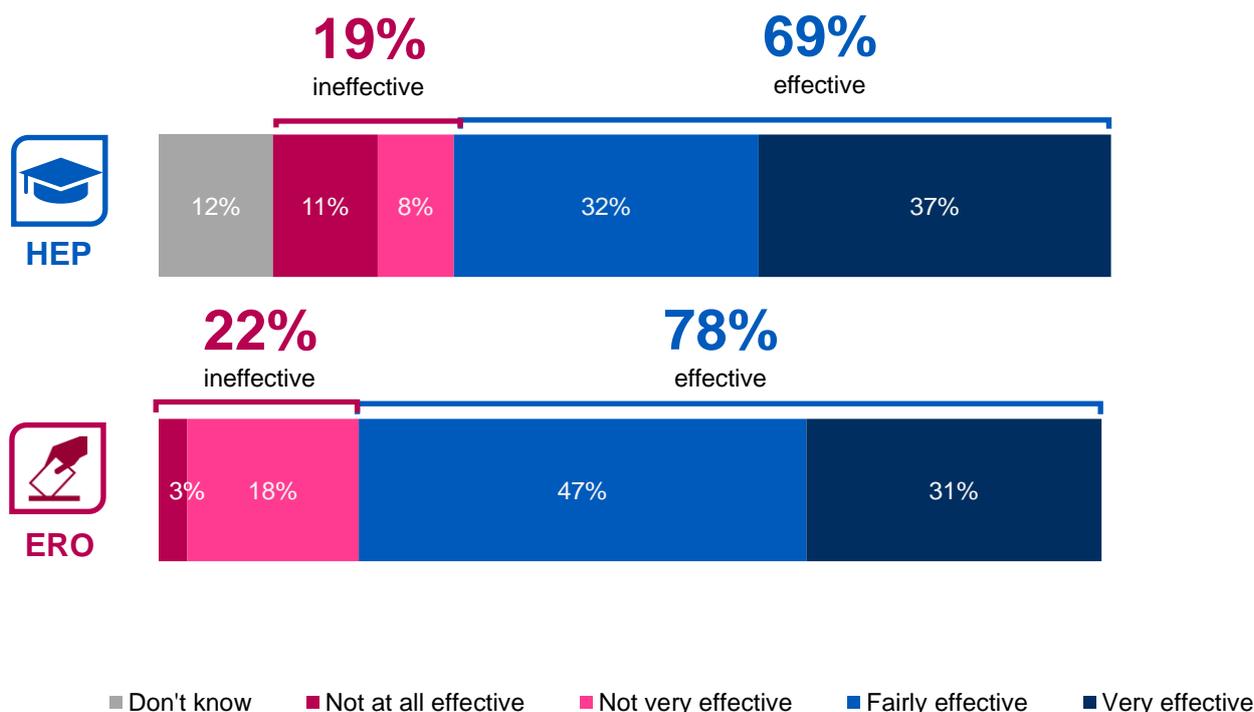


Base: All local authorities HEPs work with to facilitate student electoral registration (123), All EROs (177)

Overall effectiveness of the relationships between higher education providers and Electoral Registration Officers

Despite the aforementioned challenges, a majority of HE providers and EROs held a positive view of their relationship with one another. Over three quarters of the relationships EROs identified (78%) and two-thirds of relationships HE providers identified (69%) were considered 'effective' (see Figure 3.5). It should be noted that some of the difference between these two figures may be accounted for in the relatively high proportion of HE providers answering 'Don't know' (12%), which itself attests to a lack of clarity about expectations for an effective partnership between these two organisations.

Figure 3.5: Effectiveness of HE provider- ERO partnerships



Bases: : All local authorities HEPs work with to facilitate student electoral registration (123), All HEPs EROs communicate with about SERC (147)

HEIs were more likely to consider their relationships with local authorities effective than FE colleges (81% of relationships between HEIs and EROs were considered effective and 7% ineffective compared to 55% of those between FECs and EROs being effective and 31% ineffective).

Providers who were more engaged with the electoral registration of students at their institutions were also more likely to consider their relationship with local authorities effective. This was demonstrated by three sub-group differences:

- Providers who regularly review their approach to student electoral registration were more likely to consider their relationships with their electoral registration officers effective (76%) than the average (69%).
- Providers who reported that they were aware of and familiar with the requirements of the Condition were more likely than the average to report that their relationships with local authorities were effective (75%) than the average.
- Providers who had received a request for information were more likely to consider the relationships with local authorities effective (95%) than providers who had not received or did not know whether they had received a request for information (50%).

Positively, HE providers' relationships with local authorities had also improved since 2019, with a rise of 12 percentage points in the proportion considering the relationship effective (from 57% to 69%). This is particularly notable given the 2020 achieved sample is more weighted to FE colleges, who tend to have a less favourable view on the effectiveness of this relationship.

For EROs, those that had a positive view of the Condition were more likely to consider their relationships with providers effective: where the ERO agreed that the Condition was working well as a policy, 88% of relationships with providers were considered effective compared to 78%

overall. Similarly, where the ERO thought that Condition would increase electoral registration in the area where students study, 86% of relationships with providers were considered effective compared to 71% of those who did not.

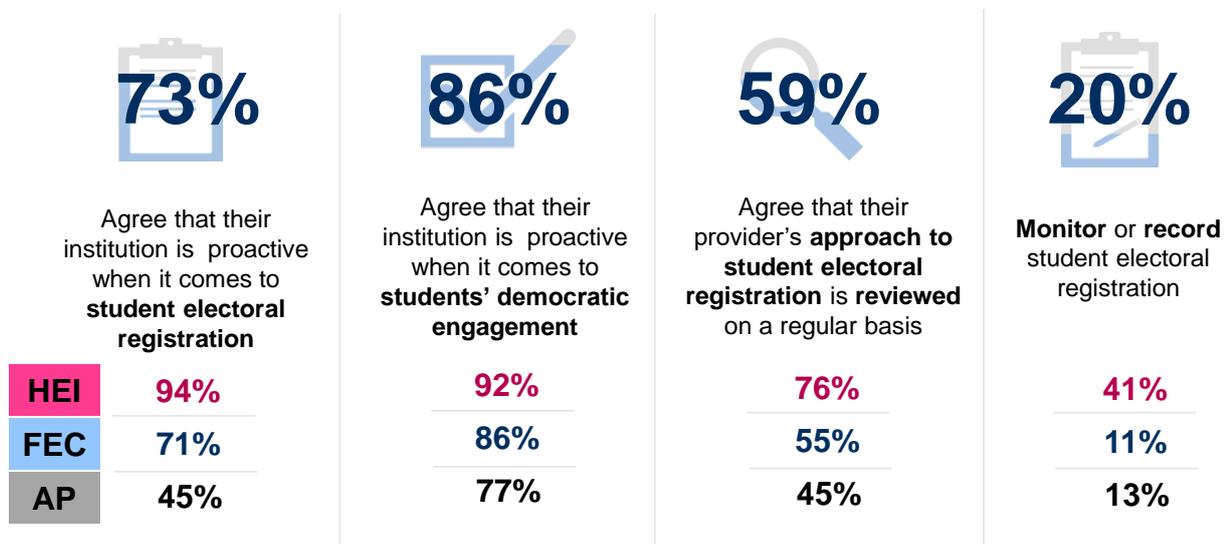
The HE providers and EROs who rated the effectiveness of more than one partnership and gave different answers were asked why their rating was different. Only seven HE providers gave different responses for effectiveness so findings should not be treated as indicative of the population. The most common reason for a difference in effectiveness of the relationship given was due to the varying levels of work they did with local boroughs and/or councils (three providers). Similarly, a small number of EROs (15) rated their relationships differently. Typically, this was because one provider was more proactive/collaborative than the other.

What effect has the Condition had on democratic engagement activities?

Activities undertaken by higher education providers to facilitate and promote student electoral registration

Providers were generally positive about their approach to democratic engagement, seeing themselves as proactive in this area. As shown in Figure 4.1 nearly nine in ten providers (86%) felt that they were proactive when it comes to students' democratic engagement more generally, but a smaller proportion (73% of providers) felt that they were proactive with electoral registration more specifically. This proactivity does not necessarily translate to formal processes to review or monitor electoral engagement though. Only a fifth of providers (20%) monitored or recorded electoral registration, and 59% agreed that they regularly review their approach. The low proportion of providers that monitor or record electoral registration points to one of the broader issues of evaluating this Condition. This means a lot of the provider perspectives were fairly anecdotal or subjective.

Figure 4.1: Provider view of their proactivity in relation to student electoral engagement



Base: All providers (171), HEI (49), FEC (91), AP (31)

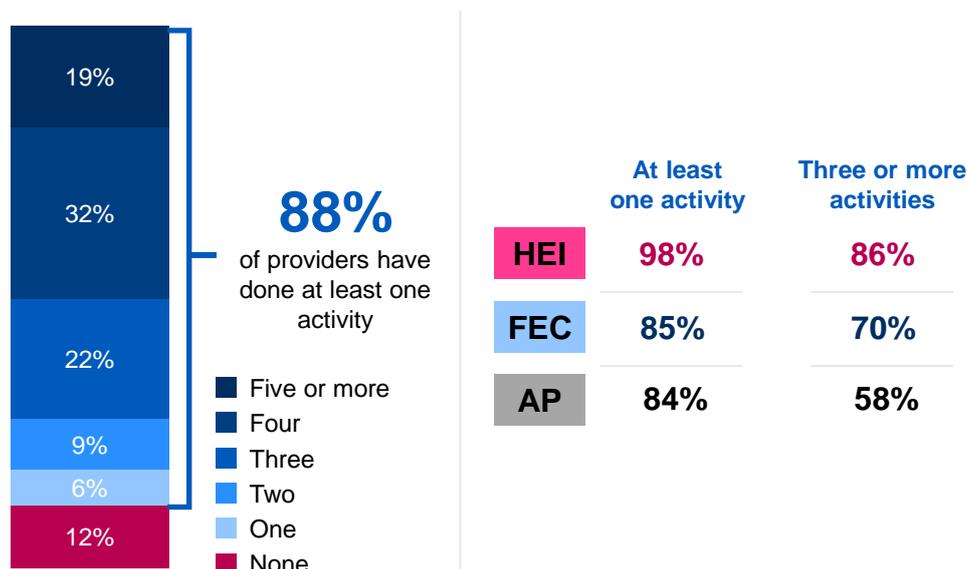
Higher education institutions (HEIs) were most likely to view themselves positively, followed by further education colleges (FECs), with alternative providers being the least likely to agree that they were proactive when it came to student electoral registration and democratic engagement. HEIs, likely due to their larger infrastructures and greater capacity to do so, were also more likely to regularly review their approach and monitor electoral registration.

Providers who had heard of the Condition were significantly more likely to monitor electoral registration (24% compared to 3% of those who had not), and to regularly review their approach (77% compared to 31%). Typically, providers saw themselves as fulfilling a civic responsibility to engage in promoting electoral registration:

“Universities are autonomous bodies, but they are bodies that really want to encourage this. I can’t think of an institution that would not want their students to register to vote – it’s a core of what we’re about – teaching students to engage appropriately in the world.”

The vast majority of HE providers (88%) had undertaken activities to facilitate electoral registration (as shown in Figure 4.2). Most providers had undertaken multiple activities, with nearly three quarters (73%) having done three or more activities and a mean of 3 activities undertaken per provider. There has been a slight increase in the proportion of providers undertaking activities since 2019 when 84% of providers who responded to the survey had undertaken any activity, and just over half (53%) had done three or more.

Figure 4.2: Number of activities providers have undertaken to facilitate student electoral registration



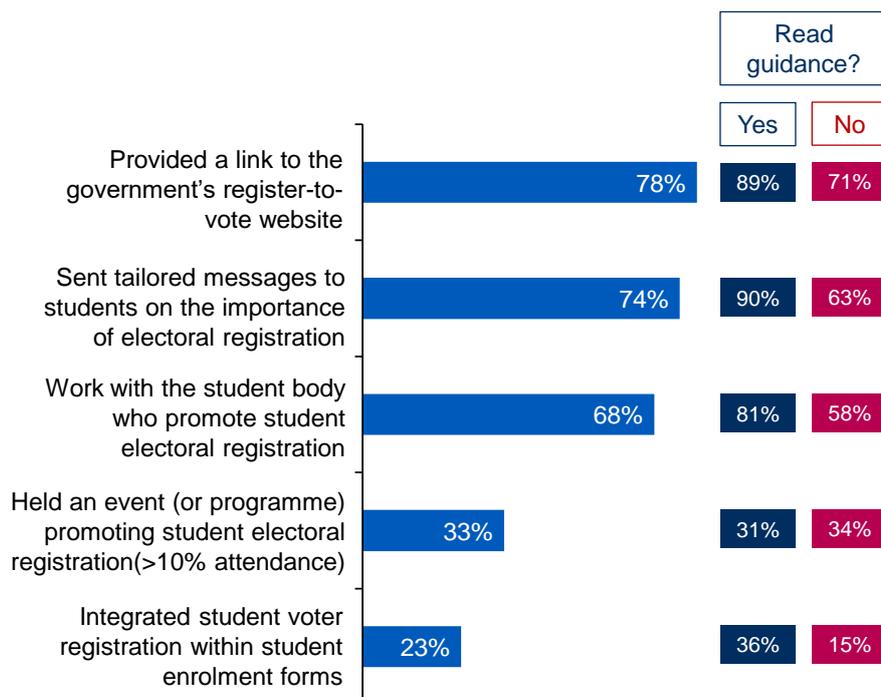
Base: All providers (171), all HEIs (49), all FECs (91), all APs (31)

HEIs were significantly more likely to have undertaken activities, with 98% having done any activity and 86% having done three or more. Similar proportions of FE colleges and alternative providers had undertaken any activity (85% and 84% respectively), but FECs were more likely to have undertaken more activities (70% had undertaken three or more compared to 58% of APs).

There is a clear relationship between the scale of activity being undertaken and awareness and familiarity with the Student Electoral Registration Condition. Providers who were familiar with the Condition were significantly more likely to have undertaken three or more activities (86% compared to 59% who were less familiar, and 63% who had never heard of it). There was a similar correlation with respect to those who had read OfS guidance: nearly all providers who had read the associated guidance (96%) had undertaken activity compared to 83% of those who had not. Later in this chapter we explore the extent to which providers felt the Condition had impacted the provision of activities.

Figure 4.3 shows the five most common activities that providers had undertaken to facilitate electoral registration. As can be seen, activities most commonly took the form of communications to students, with nearly four in five providers (78%) having provided a link to the government's register-to-vote website, and three quarters (74%) having sent tailored messages to students on the importance of electoral registration.

Figure 4.3: Most common activities to facilitate student electoral registration undertaken by higher education providers



Base: All providers (171), those who have read associated guidance (70), those who have not read associated guidance (101)

HEIs were significantly more likely to have undertaken all of the most common activities, apart from holding an event, which FECs were most likely to have done (44% had compared to 24% of HEIs and 13% of APs).

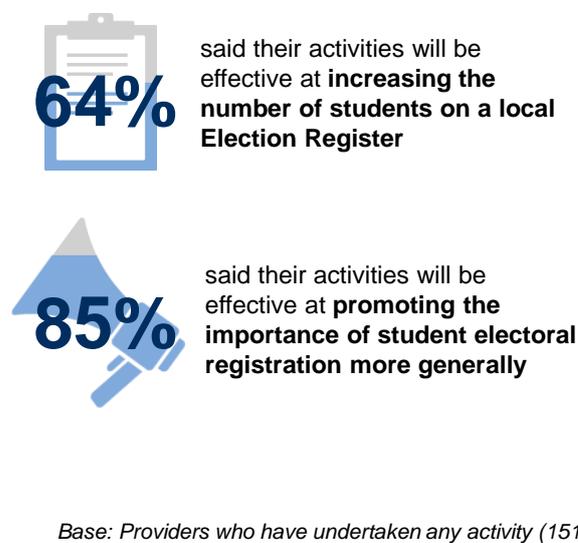
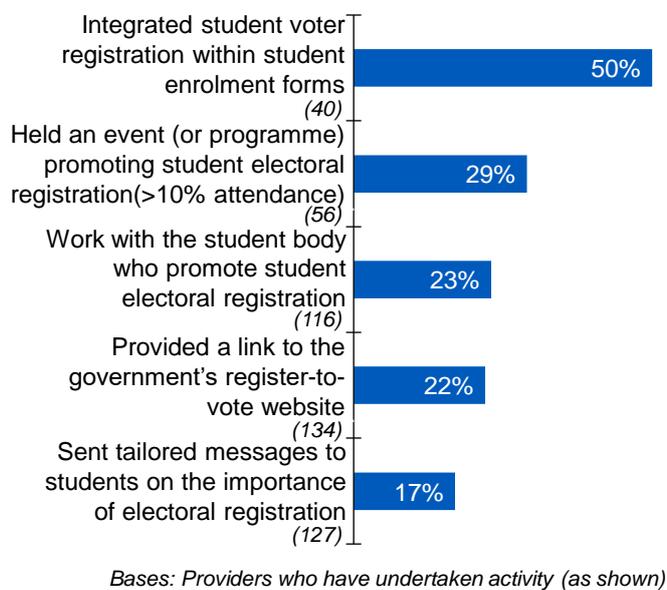
There appears to be some correlation between providers who had engaged with the guidance and likelihood to have undertaken certain activities. A case study in the guidance details how the University of Sheffield has integrated voter registration into their enrolment forms, and 36% of providers who had read the guidance had done similar, compared to 15% of those who had not. Similarly, the guidance gives examples of tailoring student communications, and 90% of those who read the guidance had sent tailored messaging compared to 63% of those who had not.

Effectiveness of activities

Providers who had undertaken activities were asked which of their activities would have the most impact on facilitating student voter registration. As shown in Figure 4.4, while integrating voter registration within student enrolment forms was not the most common activity, half of those who had undertaken it believed that it would have the greatest impact on student voter registration. Consensus among the others was not particularly strong, and only around a fifth of providers who had undertaken the most common activities (providing a link and tailored messages) believed that they would have the greatest impact.

Figure 4.4: Provider view of the effectiveness of their activities

Which of the activities that providers have undertaken will have the greatest impact on student registration?



Just under two thirds of providers (64%) that had undertaken any activity believed that their activities would be effective at increasing the number of students on the local Election Register. There were no statistically significant differences between those who had, or had not, heard of the Condition or engaged with the guidance. This figure seems quite low in the context of the efforts that providers put into undertaking activities, however it may imply that providers see their role and the activities they undertake as being more aimed at promoting democratic engagement more generally, rather than in the mechanics of facilitating registration. Providers who felt that the introduction of the Condition had been burdensome were also less likely to agree that their activities would be effective in increasing the number of students on a local Election Register (42% of those who felt the Condition had been burdensome thought their activities would be effective compared to 73% of those who did not feel the Condition had been burdensome). This could suggest that providers that had significantly changed their approach in response to the Condition were less confident in the efficacy of the activities they had undertaken.

In qualitative interviews, most providers found it difficult to describe the effectiveness of their activities as most had no way of knowing how many of their students were on the electoral register. Instead, they referred to activities with more tangible 'outputs' that demonstrated student engagement, for example student attendance at events, or a 'buzz' around promotional stands. Some, including EROs who had promoted electoral registration on campus, described how they used 'hooks' such as free food, to start conversations with students and used anecdotal evidence of footfall as a measure of success. One ERO did note though, that for them these kinds of promotional activities were resource intensive and expensive to deliver and resulted in fairly low numbers of students actually registering to vote.

Providers were more positive about the effect that their activities will have on promoting the importance of electoral registration more generally, with 85% saying that they will be fairly effective or very effective. FECs were most likely to agree that their activities would be successful in promoting the importance of electoral registration more generally (92% compared to 81% of HEIs and 73% of APs).

In student focus groups, participants were largely unable to differentiate between activities that were specifically about electoral registration, and those that were about promoting democratic engagement more generally. In fact, particularly at the FEC, some students were put off engaging in activities as they felt they would be too politicised and would focus on party politics. In promoting electoral registration though, participants described the importance of using a variety of approaches when targeting their demographic as they often felt like they were being targeted as one homogenous group:

'[On promoting electoral registration] you need to diversify the information. Make it localised, put out issues that are relevant to the local area rather than blanket national politics'

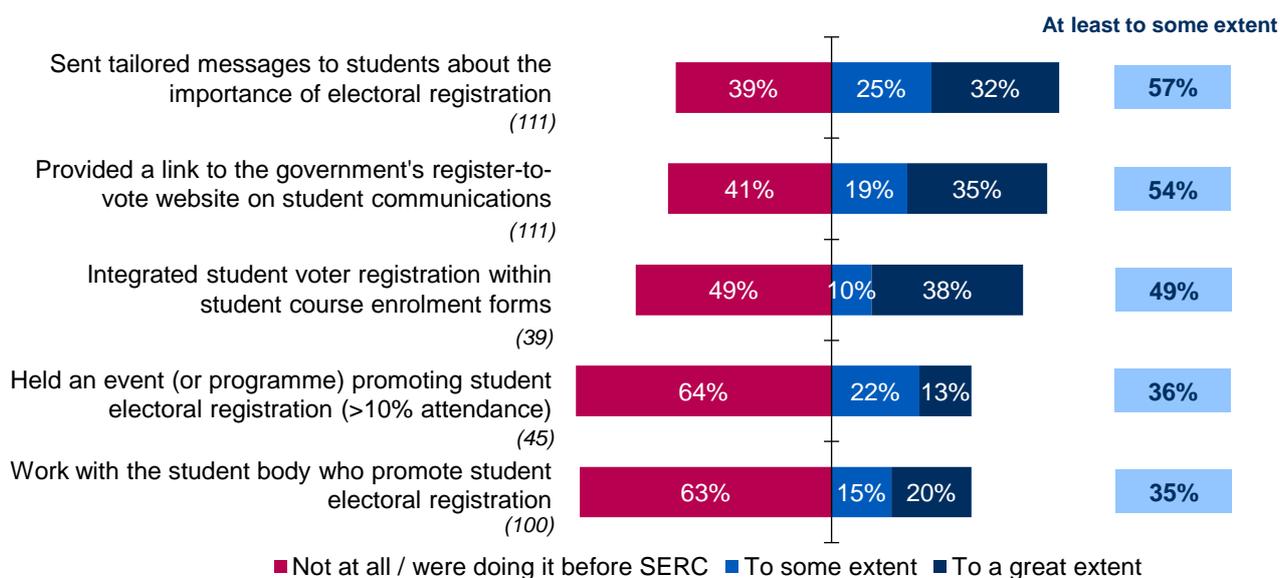
Student (HEI)

As explored previously, APs and FECs were the least likely to have undertaken activities relating to student electoral registration (16% and 15% had done no activities). Providers who had not undertaken activities were asked what barriers they faced that prevented them from engaging in student registration-related activities, however it should be noted that as the number of providers who had not undertaken activities was low, the findings should not be treated as representative of the population. Most commonly, providers said it was because student electoral registration was not an issue for their provider (9 of 20), or was not a priority for their students (7 of 20). Some did specifically mention lack of awareness of the Condition as a reason for not engaging in activity (5 of 20). There were signs that some planned to increase their engagement efforts: eight of those who had not undertaken any activity said that they were fairly likely or very likely to have undertaken activity by the end of the academic year, with five of them saying that the introduction of the Condition had influenced their decision to some extent.

The influence of the Condition on the activities that providers have undertaken or will undertake

Providers that had undertaken each activity were asked the extent to which their decision to undertake a particular activity was influenced by the introduction of the Student Electoral Registration Condition. Results for the most common activities undertaken are shown in Figure 4.5. As this illustrates, between a third and three fifths (35% - 57%) of providers who delivered the most common activities were influenced at least to some extent by the introduction of the Condition.

Figure 4.5: The extent to which the introduction of the Student Electoral Registration Condition influenced the most common electoral engagement activities



Bases: Providers who have undertaken activity and are aware of SERC. This chart only includes the five most commonly undertaken activities (as shown)

EROs did not feel strongly that the Condition had contributed to an improvement in the number and type of activities that providers were undertaking to encourage student voter registration. Half (50%) felt it had contributed in any way, but only 6% said it had done so to a great extent, and a fifth 'somewhat'. Familiarity with the Condition did coincide with a stronger perception that the Condition had an impact on the scale and type of activities though, with 69% of those who were familiar describing at least a slight contribution.

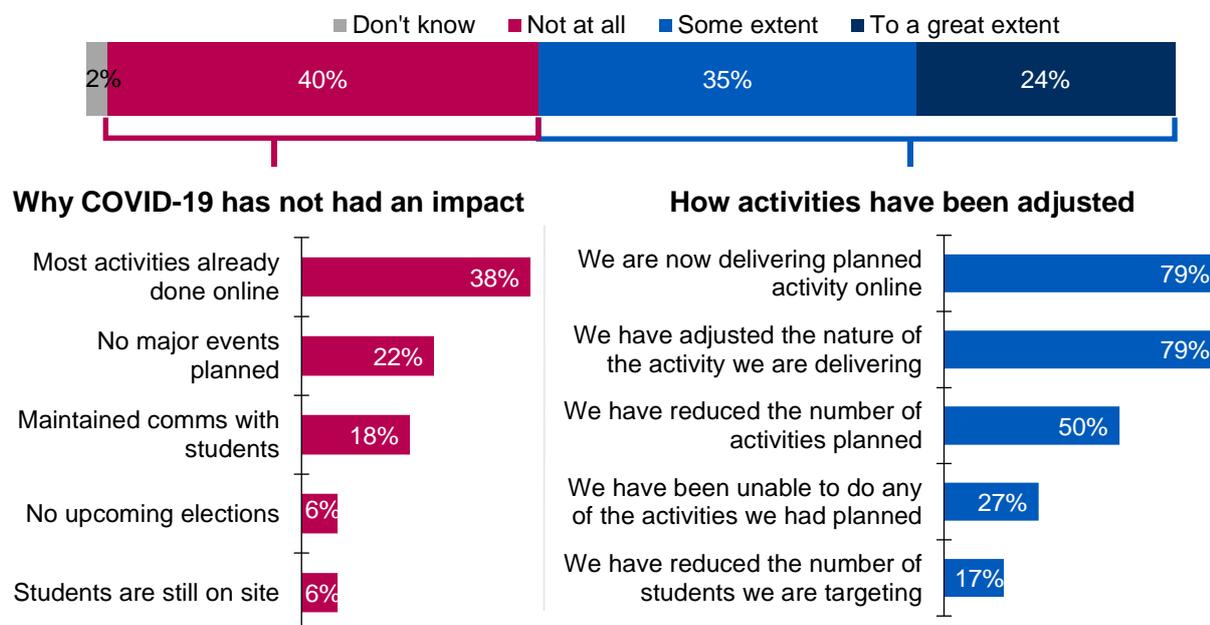
In qualitative interviews, a few providers described how their approach had not changed at all as a result of the introduction of the Condition. Two explained how they had already established the data sharing functions with their local authority as a result of the introduction of Individual Electoral Registration in 2014, had checked that their pre-existing arrangements were compliant with the Condition, and then resumed 'business as usual' (see Case Studies 2 and 4). While one said that their activities had not changed, they described how their approach – which had previously been centred around election periods – had become less 'seasonal' and more of a year-round approach (see Case Study 5). One ERO reported that adopting this more constant attitude towards student engagement would be one of the most important impacts of the Condition, as they were often overwhelmed with student registrations in the lead up to national elections. Two providers that took part in qualitative fieldwork had implemented the JISC system as a direct result of the introduction of the Condition (see Case Studies 1 and 4).

The impact of the COVID-19 pandemic on democratic engagement activities

The COVID-19 pandemic has had a significant impact on the higher education sector, with most delivery moving online and few students based on campus throughout the 2020/2021 academic year. While the case studies revealed how significantly the pandemic had impacted the day to day operations of providers, just under three fifths of providers (59%) said that COVID-19 had impacted their recent or future plans to facilitate student electoral registration (as shown in Figure 4.6). At a provider level, alternative providers were the least likely to have been impacted by the pandemic with 65% saying that it had impacted their plans (compared with 40% overall). This may be linked to slightly lower levels of engagement more generally with regards to facilitating student electoral registration.

Figure 4.6: Impact of COVID-19 on providers' recent or future plans to facilitate student electoral registration

To what extent has the COVID-19 pandemic had an impact on recent or future plans for activities to facilitate student electoral registration?



Bases: All providers (171); those who were impacted at least to some extent (80), those who were not impacted (68)

Of all providers who were impacted, most commonly they had had to move their planned activity online, or adjusted their activity in some other way (both 79%). The pandemic seems to have significantly impacted the volume of activities that providers have been able to do, with half (50%) of those impacted saying that have had to reduce the number of activities delivered, and over a quarter (27%) saying that they have been unable to undertake any of their planned activities.

Where providers had not been impacted, it was most commonly because they had already been delivering a lot of their activity online (38% of providers who had not been impacted by the pandemic gave this as a reason), although a considerable proportion (22%) reported they did not have plans in any case.

Among EROs, nearly two fifths (38%) felt that the COVID-19 pandemic had had an impact on the amount of communications they had had with higher education providers regarding student electoral registration (14% to a great extent). They most commonly described difficulties communicating with staff as a result of the pandemic, citing the inability to have face to face meetings, difficulties reaching named individuals while everyone was working from home, and providers having different priorities. Over a quarter of EROs (28%) said that they were still communicating effectively with providers.

In qualitative interviews, providers described how the pandemic had significantly disrupted their electoral engagement plans. One SU staff member explained how 2020/21 was going to be the first year that they included promotion of electoral registration in their annual delivery plans, with regular pop-up stands with staff members explaining the process, but these plans had been put on hold due to the lack of students on campus. One provider also described how any communications about electoral registration, such as emails, now had to 'cut through' an even larger volume of other messages (see Case Study 5). This provider also said that it was likely their student population would be less likely to be confined to one local authority, as many would not have been at their term time addresses.

Use of software intermediaries

Use of software providers or intermediaries to facilitate student electoral registration was not widespread among providers. Just 15% of providers had employed such intermediaries, although this increased to just under two in five (37%) among HEIs. Those who had heard of the Condition and were familiar with its requirements were more likely to have used intermediaries (22% did so).

Over half of the providers that used software intermediaries (14 of 25) used JISC to facilitate registration. Three providers used Tribal SIS, two used a Microsoft solution, and the remainder used intermediaries that only received a single mention. Nearly all of the providers that employed software intermediaries paid for them (22 of 25).

The most common reasons for using software providers was because:

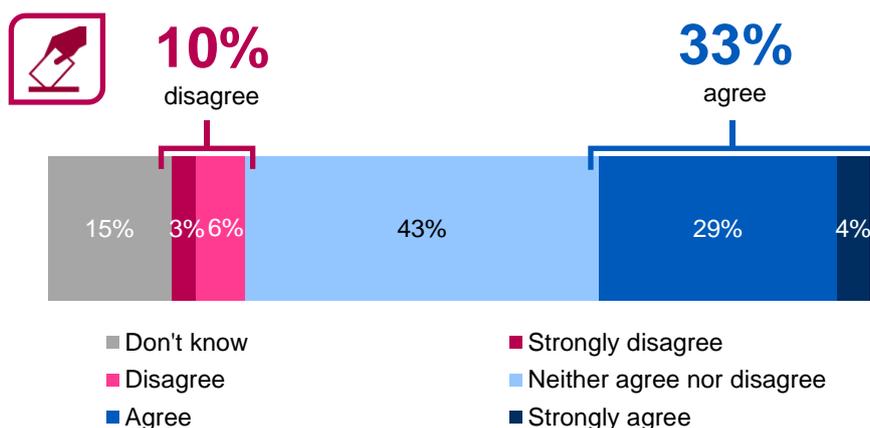
- It is time efficient (20 of 25)
- It alleviates the administrative burden of the Condition (19 of 25)
- It reduces data protection risks (19 of 25)
- It is cost effective (16 of 25)

Most were positive about their experience of using software intermediaries with 21 out of 25 describing them as very or fairly effective in facilitating student electoral registration with the remainder saying they did not know how effective they had been. Case Studies 1 and 5 provide more in-depth description of how providers have utilised software intermediaries, while Case Study 3 illustrates how one provider felt that software intermediaries did not represent a good return on investment.

What are stakeholders' perceptions of the effectiveness and impact of the Student Electoral Registration Condition?

Overall views on policy

Figure 5.1: ERO agreement that the Condition is working well as a policy



Base: All EROs (177)

Overall, EROs were either fairly ambivalent towards the Condition, or thought it was working well. A third of EROs (33%) agreed that the Condition was working well as a policy, while 43% answered 'neither agree nor disagree'. Only 10% disagreed, as shown in Figure 5.1.

Views were more positive among those who communicated with providers, with 43% of those who communicated with a provider agreeing that the Condition was

working well as a policy (increasing to 55% for those who communicated with more than one).

Those who had faced challenges in their relationships with providers were also more likely to agree that the Condition was working well (40%) suggesting that EROs felt the Condition could be leveraged to overcome challenges with providers in their jurisdiction. As explored previously, there were limited examples of the Condition being used in this way, but EROs still welcomed that they had this as an option.

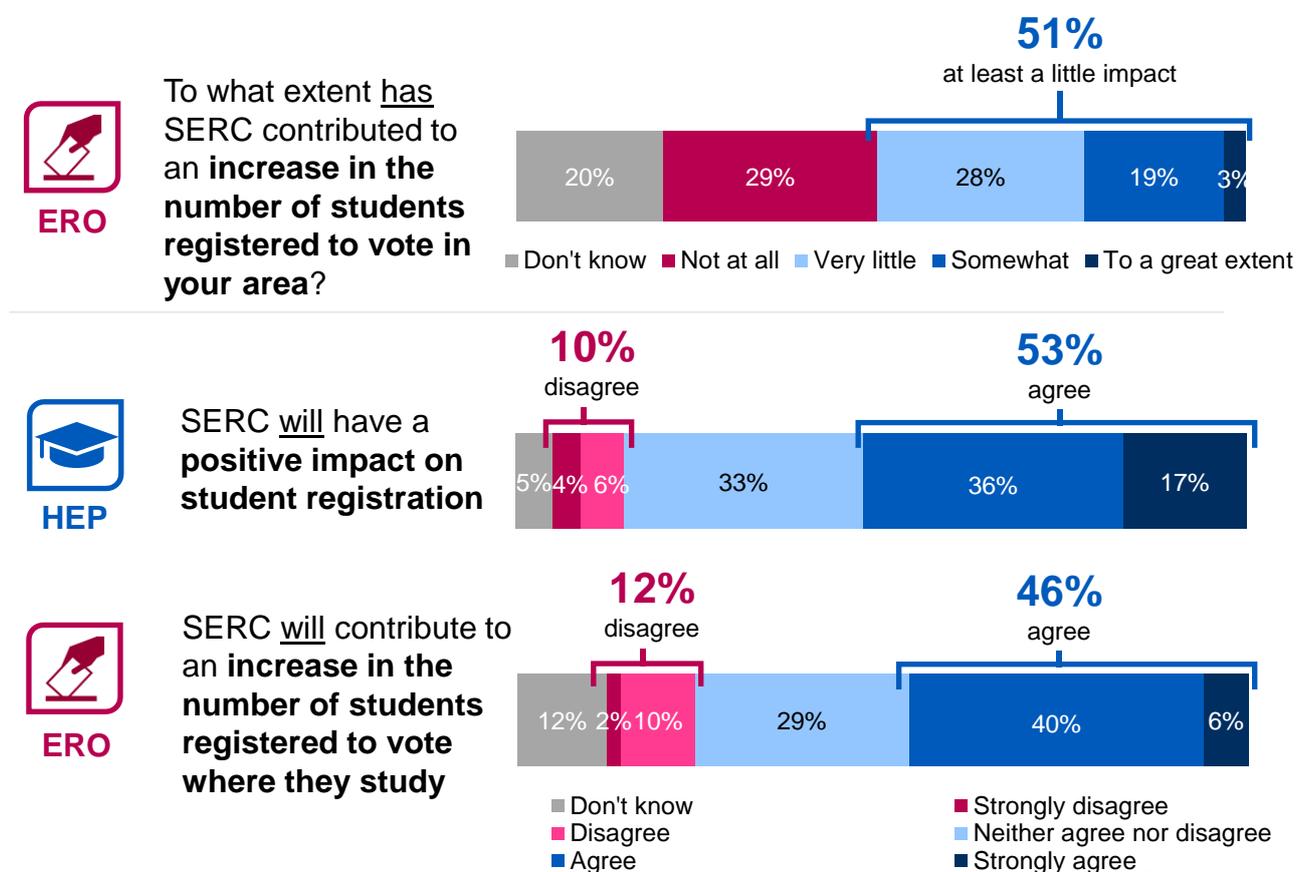
Participants in the qualitative interviews, even where they had not seen much change as a result of it, were almost universal in supporting the introduction of the Condition. There was an indication that it may take time to 'bed-in', with a general feeling in a lot of cases that the sector was moving in the right direction. One stakeholder did note that there was a slight disconnect in the kind of language that is used to regulate the electoral landscape and the higher education sector. Electoral Commission regulation is more 'legalistic' and definitive, while higher education regulation is more principle-based. They did acknowledge that this is a difficult concept to balance though, and that OfS were receptive to feedback from the sector on this issue in developing the Condition.

Views on the impact of the Condition on increasing student electoral registration

Around half of EROs and providers felt that the Condition has had, and will continue to have, an impact on student electoral registration. As can be seen in Figure 5.2, around half of EROs (51%) felt that the Condition had already contributed at least a little to an increase in the number of students registered to vote in their area, although only a fifth (23%) felt it had contributed more

than a little. Similarly, around half of both audiences (53% of HEPs and 46% of EROs) agreed that the Condition will have an impact on student voter registration in the future (although the questions were framed slightly differently). HE provider agreement with the future impact of the Condition has slightly decreased since 2019, from 61% to 53%.

Figure 5.2: Current and future views on the impact of the Condition



Base: All EROs (177), All HEPs (171)

EROs who were familiar with the requirements of the Condition were significantly more likely to agree that the Condition had had an impact on registered student numbers (63% vs. 51% overall). These EROs who were more familiar with the requirements were also more likely to agree that the Condition would have an impact longer term (62% vs. 46% overall). In terms of agreement about the future impact of the Condition, there were no significant differences across HE providers, with around half agreeing regardless of engagement with the Condition and across provider types.

Administrative burden of the Condition

Providers were asked the extent to which they agreed that the introduction of the Condition had been burdensome for their provider. Only a fifth (21%) felt that the introduction of the Condition had been burdensome for them, with more than half (53%) disagreeing, 26% strongly so. In spite of having greater administrative resource, HEIs were significantly more likely to feel that the Condition had been burdensome (35% agreed vs. 21% overall), likely due to having significantly more students and the perception that compliance with the conditions of registration to OfS were more significant to them.

There has been a slight increase in the proportion of providers agreeing that the Condition had been burdensome since 2019, with 14% agreeing in 2019 and 21% agreeing in 2020. This may be

linked to the aforementioned challenges caused by the COVID-19 pandemic. None of the providers in the qualitative interviews believed that the Condition was administratively burdensome, meaning this could not be explored in more depth in this research.

Other impacts

EROs were asked what other impacts the introduction of the Condition had had on them, and these were coded into themes. Over three quarters (77%) felt that the introduction of the Condition had produced no other impact or were unable to describe any.

Among the remainder, the most common responses were around an improvement in contact with providers (given by 11 EROs) and a general increase in awareness of providers' responsibilities (given by 9 EROs). Few EROs gave specific details of how the Condition had improved the practical aspects of student registration; five said it had improved processes, three said it had improved the quality of data received, and two mentioned that it provided a stronger legal framework to request information. It should be noted that these responses were unprompted.

Appendix A: Case studies

Case studies with eight institutions were undertaken, which included in-depth interviews with relevant provider staff, a students' union representative, the ERO and (in a handful of cases) student focus groups. As described earlier, due to the timing of the fieldwork, EROs were particularly difficult to recruit to take part in the fieldwork. A summary of the audiences that took part in each case study can be found below.

Table 6.1: Qualitative case study audiences

Case Study		Provider type	HE staff interview	SU staff interview	ERO interview	Student focus group
1	Publicly funded post-1992 university	HEI	✓	✓		
2	University of the West of England	HEI	✓	✓	✓	✓
3	Specialist public university	HEI	✓	✓	✓	
4	University of Bradford	HEI	✓	✓		
5	Ravensbourne University of London	HEI	✓	✓		
6	Arts University Bournemouth	HEI	✓	✓		
7	Further education college with higher education provision	FEC	✓	✓	✓	✓
8	Small and specialist alternative provider	AP	✓	✓	✓	

Case Study 1

Institutional background

This provider that asked not to be named, is a former Polytechnic with c.20,000 students spread over three campuses. The university had been proactive in reducing barriers to student electoral registration and had integrated electoral registration into student enrolment processes as a result of the Condition. Institutionally, responsibility for electoral registration is held by the university's Registry department which also manages student registration, awarding nominations, student fees, loans, systems portfolios and the university's calendar. This Registry Manager is linked to the university's departments for Governance, Legal Services and University Secretary. The role focuses on systems working alongside a wider team responsible for all student welcome and registration activities.

The participant from the students' union (SU) was a member of the management team with responsibility for student voice and insight. They recognised the efforts of the university to reduce barriers to electoral registration, and that changes had been implemented "very well", yet remained concerned about the low volume of current registrations. Current barriers included the curtailment of on-campus activities/promotion due to the on-going COVID-19 pandemic, registration not being integrated with the students' union's website, confusion about electoral registration that impact students, and a lack of understanding about how voting in elections relates to their own lives.

Awareness of and general views on the Condition

The Registry Manager was aware of the Condition and associated guidance and clearly understood that "it is imperative and there is explicit expectation in relation to the OfS and the requirement". The SU staff member was also fully aware of the condition and was made aware by institutional senior management that he communicates with on electoral registration. He has worked closely and positively with the university's Registry Manager to support them in meeting the requirement.

The university seemed to take compliance with the Condition seriously and the Registry Manager felt well supported by senior management. Conversations started in November 2019 and compliance was driven by purchase of the JISC Voter Registration System on License. An internal audit revealed a need to improve their processes, and the introduction of JISC at the point of enrolment was the chosen solution.

With the implementation of this solution, the Registry Manager did not see that continued compliance with the condition would be a burden to the institution in the future. While there remain challenges concerning the pandemic, the Registry Manager views forthcoming elections in May 2021 as an opportunity to further promote electoral registration.

Relationship between provider and ERO

The Registry Manager's relationship with their ERO has only recently been established – in prior years there was "effectively no relationship" - and contact since has been minimal due to the COVID-19 pandemic. After the introduction of the Condition, the Registry Manager proactively sought a meeting with the ERO to introduce themselves, explain the institution's approach to electoral registration using JISC, and to establish a working relationship. Since then, contact has largely been around confirming that the JISC system had been implemented. While the relationship is relatively new, he was keen to collaborate more closely with them in future and to take advantage of any opportunity to establish a closer working relationship that the May elections may bring.

At the time of qualitative fieldwork, the ERO had made no specific requests for information from the university.

Activities to facilitate student electoral registration

The university put the JISC Voter Registration System in place for summer enrolment in 2020. At the point of student enrolment at the university, this system acts as a gateway for students to register to vote, and it shares the information with EROs. The system can also provide reports to achieve compliance regarding the requirements for registration to the OfS. The university will monitor progress through the system but had not done so at the point of fieldwork as they felt their soft launch was not yet complete due to COVID-19 restrictions.

The pandemic had limited on-campus activity to promote the JISC system service, although staff mentioned potential opportunities in the future when more students were on campus, such as posters in the students' union and raising awareness at large student gatherings. They were keen to make JISC registration a year-round activity rather than one based purely around enrolment.

The SU staff member endorsed the actions the university has taken to improve processes around registration:

"I know working with the Registry Manager, that in terms of actually meeting the requirements of the condition, and having processes put in place they have done it and they have done it very well."

SU staff

The students' union would have liked to see the university increase the proportion of students using the JISC system, noting that submissions had been very low over the preceding six months. While the process was in place and easier to access, many students did not have the knowledge or motivation to register.

He felt that the students' union was used to face-to-face engagement on campus, and that COVID-19 had impacted this, greatly reducing engagement with activities such as students' union elections.

The SU staff member would like to have the JISC link made available on the students' union website (a task the Registry Manager said he would like to achieve for this year's May elections). They also raised the issue of confusion among students about the ability to register in two locations, yet only vote in one, and which elections this applies to. He believed clearer messaging is required on this, and also regarding proxy and postal voting.

To improve motivations, the SU staff member would like more education for young people – not just students – on the importance of voting and the need to register. He hoped that the OfS compliance would become a meaningful vehicle to encourage universities to do more for voter registration:

"I don't think that we educate our young people well enough in this country on the importance of voting... I would hope that all universities will see this as a priority, and I would hope to see that it's not just a token requirement and that the Government will hold universities to account"

SU staff

Case Study 2

Institutional background

The University of the West of England Bristol (UWE) is a former polytechnic with c.30,000 students. The university is spread over multiple campuses falling mainly within two local authorities (Bristol and South Gloucestershire).

The University sees electoral registration as an important underlying activity that contributes to the institution's strategy and ethos of developing student voice and engagement, both within the University and in wider society.

Responsibility within the University falls under the remit of the Director of Student and Academic Services. The University considers themselves to be proactive in encouraging electoral registration, both through its own activities and through the students' union. Although much of the student body is democratically engaged during elections, general apathy remains an issue.

The students' union observes that although there are some courses at UWE with politically-minded students, outside these course "not very many" will contact them on the issue:

"It can depend on the courses and the type of institutions. For example, at [The University of] Bristol, they'll have a lot more engagement [politically] because of the types of students they have who I think might be more politically minded"

SU staff

An Electoral Officer in Bristol supports the observation of student apathy (a general feeling of "what's the point") and highlights other issues such as large volumes of last-minute registrations before an election ("it is quite normal for us to have 10,000 registrations on the last day"), and students preferring to register at their home address, resulting in representation for Bristol wards not reflecting the large student population. This was supported in student focus groups, where some participants described how they felt their vote carried more weight at their home address as Bristol was viewed as a 'safe seat'. The student participants did view themselves as democratically engaged though, but agreed that student apathy may be an issue more generally, citing feelings of a lack of empowerment and a desire for taking more direct, local action.

The ERO's engagement with providers is solely with UWE and the University of Bristol – two large HEIs. They noted that while there are likely to be FECs or APs in the authority for whom the Condition applies, they were not aware of them and felt it was more appropriate to target their relatively limited resource at the two providers that make up the vast majority of HE students. They also noted that as these other types of providers would not have halls of residence, students were likely to be captured by their other electoral registration activities.

Awareness and general views on the Condition

The Director of Student and Academic Services became aware of the Condition "when the first draft came out" as consulting on regulation like this is a standard part of his role. She knew this issue would be a key part of what the Government wanted when it created the OFS, so she was not surprised by the Condition's introduction.

They did notice a difference in the Student Electoral Registration Condition compared to other conditions, which are more principle-based: "To tie something very specifically into a specific thing,

didn't seem to fit with the way a lot of the other conditions had been written." However, UWE did not find the practicalities nor the ethos difficult to comply with:

"As with all of the conditions with the OfS it's about getting institutions to do the right thing. I think this is one of the ones that we haven't struggled with as a condition, because it's what we want to achieve... I think where we got slightly nervous was that it seemed to be slightly dictating the way we should be doing it, as opposed to a general description of how you should act. It's toned down now so I think we can live with the condition but it's interesting that it became a condition in the first place."

Staff member, University of the West of England Bristol

The Director does not anticipate problems continuing to comply with the Condition in the future. She believes the guidance is fit for purpose, although she notes that their engagement with EROs has lessened over time. She appears resigned to the fact the relationship is not as close as it once was: "it is what it is."

When the Electoral Officer in Bristol first heard about the Condition, they felt it was going to significantly help their situation. However, they do not feel implementation has improved their situation:

"When it was first in its infancy. I think the Electoral Commission made a comment on their bulletin that it was going to happen to give EROs more power to get information from universities. I think we all felt it was going to be amazing, and that it would finally sort out the problems, but it hasn't happened for Bristol."

Electoral Registration Officer

The Representation Manager at the students' union has not observed significant changes regarding Electoral Registration since the Condition was introduced: "There certainly hasn't been a get together to plan a voter registration drive or anything...from my understanding, nothing has really changed."

Compliance with the Condition

Students are directed to a clearly signposted link to electoral registration in UWE's student enrolment process. Signposting during enrolment is usually reinforced with face-to-face encouragement; students would go to the Conference Centre and they would have support staff to encourage registration with a GP and electoral registration. Over the past year the link to electoral registration has been delivered purely online with no supporting encouragement. The University however does not know how this change has impacted behaviour: "we have no idea because we don't have that data".

UWE report receiving no requests for information from their EROs. The Director believes this might be due to prior work that established "quite robust" data-sharing practices, developed collaboratively when Independent Electoral Registration was introduced: "I recall quite a lot of meetings with them trying to work out what we could and couldn't share. But since [the Condition] came in I don't think they have asked us to share anything."

UWE's account contrasts with that of the Electoral Officer at Bristol Council. While they agree that there were regular meetings at the beginning, they have been disappointed with subsequent actions and outcomes. They cite two main difficulties:

1. The lack of HEPs collecting National Insurance numbers
2. Inconsistency with address and matching them to the Electoral Register (particularly for students in halls)

The National Insurance issue results in more work for the local authority to chase this data from residents themselves. Embedding this into the student enrolment process would reduce the workload for EROs. The Director at UWE also saw potential for better data integration involving National Insurance numbers to improve their student registration process; in the current enrolment registration process they believe students drop-out at the Electoral stage because they may not have their National Insurance number to hand, and never return to complete the process: “What we want to do is to be able to integrate it further. Obviously we wouldn’t force people to register but we want it to be a conscious decision of ‘I’m not going to register’”.

In terms of data collection and sharing, the Director at UWE says they initially felt slightly pressured to adopt JISC, and the Bristol Electoral Officer confirmed they promoted it to local universities. The local authority had several productive initial meetings, including with IT staff at HEPs, but ultimately report a lack of progress and many “false promises.”

UWE chose not to adopt JISC because they already had a student record system that they could link to electoral registration. They work with “a huge number of local authorities” so they didn’t want the extra complexity of bringing in an additional system. They are now moving to a new off-the-shelf student record system, yet have not “closed the door” on JISC as a future option.

The local authority in Bristol have used the Condition as a ‘stick’ to encourage improvement, but the impact has been limited. The Electoral Officer believes HEP senior leadership is not sufficiently engaged, although they note more ‘pushback’ from The University of Bristol than UWE. Sometimes conflicting legislation becomes the sticking point, in particular HEP concerns about GDPR versus ERO insistence on the Condition. They recognise the option to complain to the OFS but haven’t because the HEPs have “complied to a point”.

“I don’t get the impression from the universities that it’s high on the list of their priorities. They think ‘we just have to supply you data, here it is’. But if it’s no use to us, there’s no point in supplying it. Because they feel they’ve supplied it, they’ve met their legal requirement...the universities, through JISC or whatever, need to be collecting the national insurance number on behalf of the ERO and supply the data in a format we need so it’s usable and we can register that individual and job done, they’re registered. That would be my ideal. But I think we are quite a long way from that.”

Electoral Registration Officer

Activities to facilitate student electoral registration

In addition to signposting at enrolment, UWE say they are always active around elections to drive registration. The students’ union and the university collaborate to avoid duplication, with the union taking the lead. The university encourages hustings and diverse speakers prior to election. Speakers will attend, encouraged by the political societies, and events are generally well attended. However, the University collects no data on the impact of these activities on registration.

Activity around electoral registration drives has reduced during the COVID-19 pandemic. The Director at UWE says they intend to return to face-to-face promotion when more students are back at campus, and the increase in online activities during the pandemic “gives us more ways to reach out to students.”

The University wants to make it easier for students to register during enrolment by making the process easier and more integrated to reduce drop-out. The Electoral Officer echoes the view that enrolment is the best opportunity to significantly improve registration:

“We used to go to the big open days [enrolment]...but you come away and we’d only managed to register about a hundred students so you think, is it worth your while...I strongly believe that the best way to get a student to register to vote is right at the beginning when they initially attend the university to fill in their induction forms. If as part of that process...when they’re more engaged with providing personal information, that would be the point where it would be most effective. It would capture so many more.”

Electoral Registration Officer

Case Study 3

Institutional background

This is a specialist university, with c.10,000 students spread over four campuses.

The university perceives its role as facilitating student electoral registration by providing a route to registering upon enrolment. They provide a generic link to the government registration website, within each enrolment form, accompanied by informative text. Generally, they consider themselves to be proactive in this regard, with senior leadership in agreement that the university has a role to play in signposting students.

Responsibility for overseeing this process originally lay with the Registrar, but when they moved across to Academic Services department, this particular responsibility transferred accordingly. The University leaves promotion of democratic engagement to the students' union. While they cannot quantify student engagement, they believe that students are becoming more aware of their democratic rights and that they take a particular interest during national elections. COVID-19 has increased political engagement, but has also created barriers in communications with students.

Awareness and General Views on the Condition

The university first learnt of the Condition via Office for Students communications, and has a fairly tight understanding of its requirements.

“We felt the Condition’s requirements were clear, and – while I haven’t looked at the documentation for a while – I do recall a number of us poring over the Condition to make sure we were doing what we were expected to do.”

Staff member, provider

While the university considered it was already meeting the requirements of the Condition when it was brought in, they still feel it will have a positive impact for them, and the sector more widely, as it will mean HE providers who had up to now been less engaged will necessarily change their approach. This will create a more level playing field, and ensures greater levels of fairness and equality across the sector. The university also appreciated that their own views on the importance of student voting are now reflected in official OfS guidance.

“Our leadership team was very clear that we engage with the Condition [not because it’s a regulation but] because registering to vote and operating your democratic right is important.”

Staff member, provider

From the ERO perspective – while they have not been required to refer to the Condition so far in dealings with HE providers – its presence is reassuring, and supportive mechanism.

“I’m aware of the Condition but I haven’t had to use or enforce it. That said, I like the fact that it’s there; I’d be nervous if it wasn’t.”

Electoral Registration Officer

The ERO also suspects that – not so much with this university – the Condition has had a small impact in the attitudes of universities, whereby they are now taking on greater responsibility and becoming more proactive in the realm of student voter registration.

“We probably drive voter registration in our area. That’s the way it’s been for the last few years, but it should be more of a mix [between us and providers]. Actually, I have seen the attitude among universities starting to change recently.”

Electoral Registration Officer

Compliance with the Condition

With campuses in four different locations, the university has four local authorities they need to engage with. They already had links with all four prior to the Condition being implemented.

Currently, however, they only have an active communication channel with one local authority, that covers one of their larger campuses (this is the ERO that appears in this case study). With the remaining three, none have engaged the university on student electoral registration since the Condition was implemented. The university suspects that as campus numbers are relatively small (<1,000 students) the local authorities do not consider it worth their time trying focussing on student voter registration. This suspicion was confirmed by the ERO.

“It doesn’t surprise me that some local authorities don’t have relationships with universities. You’re contacting these students a lot, writing letters, emails etc. and you often get nothing back. If you’re doing that en masse and get little reward, it’s a lot of work, time and money for not much return.”

Electoral Registration Officer

With the one local authority they have communicated with in the last 12 months, this has been a simple student data request, with which the university was easily able to comply.

Activities to facilitate student electoral registration

The university chose not to use an intermediary such as JISC to support registration as they felt the return on investment would not be merited. The students’ union representative contrastingly felt that embedding registration within the enrolment form (rather than being directed to another webpage) would be the most effective solution to increasing student voter registration.

In terms of activities undertaken, the university focusses on two strands: incorporating the relevant link into the student enrolment forms, and liaising with local authorities when they request information. The students’ union, however, more actively engages the student population, encouraging them to register to vote. These activities are typically scaled up when there is a forthcoming election. For example, prior to the 2019 General Election, they ran a hustings, where local candidates were invited to the different campuses and debated topics that students submitted (similar to BBC’s ‘Question Time’); while the union also had a handful of student volunteers spend a day on campus informing students of their democratic rights, and providing tablets so that students could register to vote. Both activities were considered a success, with a high student turnout at the hustings, and a couple of hundred registering to vote via the tablets. A particular challenge for the students’ union in running these events is planning and delivering them across the four different campuses, although this did not appear to limit what they wanted to achieve.

“It’s challenging doing this across four campuses. It takes a lot of planning, we have to distribute enough resources and materials to each site, and then ensure we have sufficient staff and volunteers on site too.”

SU staff

Quite often as well, elections (particularly May elections) occur outside the university term time. This makes it more difficult for the students’ union to encourage student voter registration.

In addition, some EROs attend student fairs, where they have also encouraged students to register to vote. Communicating directly with students is perceived as the most effective route to raising

awareness and increasing student voter registration. Owing to the COVID-19 pandemic, however, this has not been possible recently.

Case Study 4

Institutional background

Bradford is a public research university, located in West Yorkshire. The learner population includes c.10,000 students, of this around 20% are postgraduates. The majority of students are local residents, with smaller proportions living on campus or commuting.

Outside of the Condition the university has always perceived its role as encouraging and aiding students to register, which they do through a number of forums. Bradford considers themselves to be proactive in this regard, predominantly facilitating registration through enrolment, where students can opt in to sharing their details with EROs. Responsibility for overseeing the registration process lays with Academic Registrar, however this was not the main part of their role and required minimum day to day resource.

“The University of Bradford has always believed in the importance of encouraging students to vote. As long as I’ve been here [since 2014] we’ve tried to make it as easy as possible for students to register.”

Staff member, University of Bradford

Students at Bradford were perceived as ‘politically aware’. Unlike most other providers Bradford has line of sight to the proportion of students registered to vote, this is high with 7,700 of the 10,000 students registered. Student’s historically have been engaged with political events such as ‘hustings’, with interest extended to both national and local elections.

Awareness and general views on the Condition

The Academic Registrar first became aware of Condition in April 2019, when it was first introduced. Initial response to the condition was that it was not relevant to Bradford as there were already processes in place to facilitate registration and established relationships with EROs. Within the first week of published content being released, Bradford reviewed the information to ensure they were compliant and then carried on as usual. To further facilitate registration Bradford was part of the initial working group for JISC, however, chose not to engage with the service as compliance of the condition is perceived as straightforward. Although, JISC was considered useful for providers less engaged with their EROs.

“We were fairly confident we’d meet the terms of the condition, because a big one was getting people to register at enrolment, which we had already been doing for years.”

Staff member, University of Bradford

The information published on the condition was perceived as clear and easy to digest. However, focused on the ‘what’ rather than the ‘how to’, which was believed to be more helpful for universities, especially those not already engaged with student registration.

Compliance with the Condition

Prior to the Condition Bradford had existing positive relationships with the EROs, which was solidified in 2016 when the process for sharing student data was established. There is active communication between the university and five EROs, as Bradford regularly transfers student details. Due to the existing practice of data sharing with EROs, Bradford have not needed to action any requests for information.

“We don’t get a lot of requests for data from EROs because we have an established relationship. They know when they’re going to get their data and how it’s going to look. They don’t need to follow up on us.”

Staff member, University of Bradford

Currently, Bradford is looking to extend the number of EROs they are in communication with, emphasising this would have happened regardless of the Condition. The relationship between EROs and the university extends to contact with the students’ union and other senior leaders at Bradford, which was again established before the Condition.

Activities to facilitate student electoral registration

Since 2016, Bradford primarily uses enrolment to increase student registration. At the point of enrolment students are provided the opportunity to share their data with the five main EROs Bradford currently works with. Although the key EROs are covered, as mentioned above, they are expecting to extend this in the coming years, with the aim to better assist their commuter population.

The students’ union and registrar office also collaborate to promote registration, through marketing, democratic engagement, and through in person events during local elections. Pre COVID-19 events such as hustings were held, where local candidates are invited to the campus to debate topics and answer student questions. Due to the previous success of these events Bradford is attempting to move the platform online this year. The SU also collaborates with EROs to have voting booths set-up on campus. This was believed to increase the visibility of local elections and foster engagement with registering and politics through feeding into ‘the buzz’ surrounding voting.

*“Our marketing aims to remind students that most of them **are already** registered to vote, as they’ve allowed us to do that on their behalf.”*

Staff member, University of Bradford

Overall, however, Bradford did not believe the Condition had any impact on their registration activities, as all were previously established. Although it was thought the condition would improve many universities willingness to be involved in the registration process. It was emphasised that the Condition was non-onerous and inexpensive so universities should be doing everything they can to facilitate registration.

“We were already established when the condition came in, it was just a case of checking we met the requirement and carrying on as business as usual.”

Staff member, University of Bradford

Case Study 5

Institutional background

Ravensbourne is a digital and media design university which focusses on vocational training. Most of the 2,400 students live locally in the Greenwich area.

The university perceives its role as facilitating student electoral registration, through helping students to understand their rights to register, to vote and their place in the electoral process. It is believed that because students sit uniquely in the way they register it is important for the University to help them understand this process, as confusion may prevent political engagement. Ravensbourne considers themselves to be proactive in helping students register using platforms such as in person events and marketing campaigns to increase engagement. Student Services and the students' union work together to encourage political awareness amongst students, while the student registration team accommodates ERO data requests. Senior Managements ensures resources are distributed as and when required to administer the process or engage students with elections.

"We help students to understand how their voice can be heard, whether that be through voting or through their own creative process"

Staff member, University of Ravensbourne

Historically students in Ravensbourne come from backgrounds with low political participation, which the university is attempting to address. However, COVID-19 is believed to have interfered with engagement, as political advertising needs to compete with a cluttered market and previous in-person events could no longer be held. The University believes assuming Greenwich is still the appropriate ERO for students may exclude those who have not returned to their term addresses. Consequently, electoral communications have been made general rather than focussed on Greenwich, as they previously were. Despite communications being broadened, Ravensbourne has not reached out to other EROs, although JISC is in place to accommodate new requests. Currently the university is investigating how to engage students with registration, through online forums.

"Now everything is emails, it's a much denser communication climate and it's hard to get the registration heard over other messages"

Staff member, University of Ravensbourne

"Young people want to be heard, want to see that change is happening, locally or nationally. When this doesn't happen it's discouraging. This is impacting their involvement in politics"

SU staff

Awareness and general views on the Condition

The Head of Student Services described their initial response to the Condition as being relatively 'agnostic'. It was felt the Condition was more useful for institutions who were not previously engaged with student registration. The guidance was reviewed to ensure Ravensbourne was compliant, no changes were required as a result of the condition. An established relationship with the Greenwich ERO, which included data sharing was in place prior to the condition.

While the university had set procedures prior to the Condition, published guidance was still viewed as useful. The focus on case studies and real-world examples was considered engaging, straightforward, and provided new ideas on how to involve students with registration.

“The guidance was really useful to see how we could move our registration forward. It was good to see how other Universities had solved technical issues and allowed us to realistically see what resources are available.”

Staff member, University of Ravensbourne

Compliance with the Condition

As mentioned above, prior to the condition Ravensbourne already had links with the Greenwich ERO which included: staff involvement with student registration, ongoing communication to find new ways of engaging students and Ravensbourne submitting annual data requests. The biggest challenge pre and post condition, has been determining where students should register, as their population is spread across several counties. The admin associated with determining student's EROs has been intensified by COVID-19, as many students have remained at home this year. To address this JISC was introduced to assist the registration team with data requests.

Despite Ravensbourne having registration procedure prior to the condition they do believe that it helped them formalise their internal structures. There was a greater deal of 'planning ahead', determining how to comply efficiently and putting data sharing agreements in place with EROs. It was noted that pre-condition, processes for data sharing and student engagement were linked to elections, however now it is at the forefront of strategy and planning. As a result, processes are more formalised, and the speed of processing data requests has improved. The condition was also thought to have solidified political engagement activities and led to documentation for learnings from previous campaigns to be taken forward.

Activities to facilitate student electoral registration

Ravensbourne facilitates student registration through in-person events and marketing. The Student Services and students' union's work together to promote registration within student voice meetings, academic settings and students paid to engage other students with registration. As mentioned above, EROs are typically included in engagement events by meeting and registering students in person. The students' union use incentives, speaking to students in lectures, and handing out leaflets to encourage registration. They also use their social media platforms to connect students with resources such as manifestos and political updates. Describing personal benefits and giving out free food is thought to be more engaging for students than speaking to them about democratic rights. A positive outcome of the Condition is that the SU now encourages voter registration yearlong rather than seasonally focusing on elections.

“The condition ensured that engagement activities are not a one-off thing for example if a particular elected SU official had a particular interest, but instead a year long process to encourage student voting.”

Staff member, University of Ravensbourne

“Providing incentives and talking to students about personal benefits e.g. being able to get a mortgage is more effective at getting people to register than explaining their democratic rights”

SU staff

Case Study 6

Institutional background

Arts University Bournemouth (AUB) is a specialist arts university offering courses in art, design, media and performance to 3,500 students. The university has a long-term record of encouraging student voter registration, considering itself to be one of the first HEPs to have established a data sharing relationship with their local ERO.

Political engagement at AUB is considered to have increased in recent years. The SU staff member believed that their students were becoming more proactive in their attempts to influence national political decisions, as they are increasingly affected by them, and also cited a higher than average students' union election turnout as evidence of democratic engagement.

Awareness of and general views on the Condition

The staff member with overall responsibility for electoral registration has been aware of the Condition since it was first announced by the OfS. Their view of the Condition was generally positive as its requirements were not considered particularly complicated. Furthermore, they had read the OfS guidance on the Condition as soon as it was released. They considered the guidance straightforward and, as a result, thought that any further guidance on the Condition would be unnecessary.

"We know it is a requirement and we have to make it happen, it is not controversial in any way."

Staff member, Arts University Bournemouth

Despite their positive view of the Condition, they did not consider the Condition to have had any impact on their institution due to AUB's long term data sharing agreement with their ERO.

The students' union staff member also had a positive view, though they were unaware of the condition prior to their interview. While they also noted that AUB was in line with requirements, their overall view of the condition was also influenced by its best practice recommendations. They responded positively to the parts of the Condition which encouraged Universities to take further action on facilitating student electoral registration.

"I understand why some universities would be reticent to do further pushing and work on registration but again I quite like the idea about there being guidance to encourage them to do more."

SU staff

Yet both management and the students' union felt there was no basis to judge whether the Condition had improved student registration numbers, as there was no attempt to measure student voter registration locally.

Compliance with the Condition

AUB believe have been compliant with the Student Electoral Registration Condition since its introduction. The only change the university has had to make to comply with the condition has been including a gov.uk register to vote link on course enrolment forms. Otherwise, AUB has a long-term data sharing arrangement with their ERO in place. The only issue with compliance that was highlighted by the Head of Student and Academic service was the use of JISC software. Once the institution discovered that the software was not a requirement this issue was resolved.

“JISC didn’t offer any additional benefits over what we already had,”

Staff member, Arts University Bournemouth

Furthermore, compliance with the condition has recently been made easier for the institution with the merger of three local authorities (Bournemouth, Christchurch, and Poole) where students typically live during term time. The merger has improved the institutions’ ability to collect more complete data to provide in their data sharing agreement.

“It means that we are able to provide more complete data for that whole area rather than just Bournemouth.”

Staff member, Arts University Bournemouth

The SU staff member was also aware of the activities that had been taken to comply with the condition. Yet they highlighted that several students were unaware that the gov.uk register to vote website was included as part of course enrolment forms.

“I am having several students say to me that students don’t remember that being the case and I’m not sure if this is something that still goes on, I would need to find out.”

SU staff

Activities to facilitate student electoral registration

Besides the actions to comply with the condition, another activity the university itself managed to facilitate student voter registration was using the university as a polling station during elections. The Head of Student and Academic Services considered that this would boost awareness of voting. Otherwise, in-person activities to facilitate student voter registration were considered the responsibility of the students’ union.

The SU staff member considered that the management of the university were leaning on them to lead in person activities to facilitate registration, something they put down to AUB’s only relatively recently becoming a university with degree-awarding powers.

“We are a very fresh full-fledged SU so I think there is a bit of institutional memory of us being part of the actual University rather than a separate organisation... I think they lean on us quite a bit because they almost see us as subsumed and underneath them even though we are separate.”

SU staff

The SU had tried to involve the University management in a registration drive promoting electoral registration immediately after student lectures.

“We did contact the Uni centrally about [attending lectures]...there was no movement on it. It is seen as the thing that the SU does rather than something they do.”

SU staff

Other student registration drives have taken place at AUB prior to UK General Elections. As part of these activities, information was given to students including how to register to vote, why it was important to vote, and using postal or proxy votes.

Case Study 7

Institutional background

This further education college provides further education, apprenticeships and vocational training to around 15,000 school leavers and adult learners. They also offer higher education courses, of which around 10% of their student population are studying, and are registered to the OfS.

The provider saw their role in student registration as relatively passive outside of election periods. It was reported that student engagement with voting is 'seasonal' and more effort could extend to everyday support of student registration. However, senior management is concerned about and acting to address political apathy in the local area. To do this, during election period events are held to inform students that they *can* register, combined with information on how to vote. Responsibility for raising awareness and increasing engagement sits with the lead for student engagement, while data collection lay with admissions. Minimal day-to-day resourcing is allocated to student registration.

"When there is a General Election, or a Mayoral Election, something like that, you know, something high profile, then they {College} are quite on it, but for a continual investment in it.....well, I think it should be happening every single year"

Staff member, provider

Historically, engagement and turn out for elections has been poor. Limited ability to study politics as part of high school curriculum, the local area being relatively disadvantaged, and a general apathy towards voting were thought to be contributing factors. There was agreement from the local ERO that engagement in voting is low. Previously there had been an ERO who worked jointly with colleges to engage students directly and raise awareness of voting, and even this proactive approach did not result in a significant increase in registration amongst young people.

Student participants in focus groups however saw themselves as politically engaged, and believed that there were lively political debates on campus, although did accept that their peers may not reflect the whole population.

Addressing lack of awareness in politics is an on-going issue for the provider. As the usual engagement methods are unavailable, such as hustings, information on registration and political events has shifted to online platforms. However, there was a concern that students were not engaging with these resources.

"I think what often affects students in voting is that they don't have that kind of input in the school system. They are living in a household where people haven't voted or are voting in a really strong way and there are a lot of cultural issues as well, so you have to be really mindful not to do anything 'massively political'

Staff member, provider

Awareness and general views on the Condition

The staff member first learnt of the Condition when contacted about this research. However, they believed anything that contributed to increased voter registration was positive for their student population. Similarly, knowledge of the condition for the ERO was limited, typically engaging with providers only occurs two weeks annually during the canvassing period. As a consequence of limited resources being applied to the Condition, engagement with the published materials was low and could not be commented on by either ERO or the provider.

Compliance with the Condition

The provider staff member was unaware of compliance, however emphasised that the college had tight data control systems and believed requirements of the Condition would be met. From the ERO perspective, making requests from the provider was perceived as challenging. To aid communication between EROs and HE providers it was suggested that OfS could send out reminder emails prior to the canvassing period.

“Obviously they are busy and things like that. Sometimes it can be difficult, you have to keep reminding them, ‘we need the data file please’. But I think that is the nature of everyone’s role now, that things aren’t easy to obtain”

Electoral Registration Officer

The provider’s communication with students had not changed as a result of the Condition. However, it was commented more would need to be done to inform students about registration as adding a ‘tick box’ may increase registration but not knowledge on voting. This staff member had not had any recent contact with their ERO, but they had worked together in the past to support local elections by having an onsite polling station.

“I suppose it can be lost in translation. People can think I have to tick that box so that I can get this, without really taking it in. I think it needs to be quite visible”.

Staff member, provider

Activities to facilitate student electoral registration

The condition has had no impact on activities or behaviours for the ERO or the provider.

Beginning prior to the Condition, the college holds three regular events to increase engagement with politics and voter registration. One is designed to educate students on the political climate and give them a forum to ask questions. Tutors bring students together and provide information on voting and encourage discussion on political events, such as Brexit. Hooks including pop-ups and free food are used to attract a large audience. Another event offers food at pop-up stands with volunteers using this opportunity to engage the captive audience about voter registration. All events typically attract a high student turnout and are believed to increase politics awareness amongst attendees.

“So they [students] were like sitting ducks, instead of just queuing up for [food], they had all these Councillors that were going up and talking to them”

Staff member, provider

Students had positive memories of these activities, believing that they created a positive ‘buzz’ around elections. They could not recall what the specific messages were though – whether they had been focused on electoral registration, or whether they had been party-political. In fact, they believed that in general, there was a lot of noise around student promotion with multiple parties vying for the young vote. As such, they felt messaging was often lost, and promotional activity had to be clear and direct to cut through the noise.

The ERO reported that there was no specific thrust aimed at getting students to register to vote. Instead, their canvassing period involves data mining which encompasses the general populace. Engagement was limited to providing information to students’ unions to promote on their website. It was felt a dedicated role that engages with universities with the intention of raising awareness/educating students would be beneficial, although due to budget constraints it was recognised that this is not possible.

“It’s not only for students, we look at council records mainly from council tax so we can start the process of getting them registered and updating the records, writing to them, that type of thing”

Electoral Registration Officer

Case Study 8

Institutional background

Small, specialist provider in London without a conventional campus set-up of larger institutions. Around half the students are British nationals and most live locally, but not in the local authority where the provider is based.

The provider understands the need to comply with the electoral register requirement, yet admit they are doing the minimum to comply, in the knowledge that compliance is an important expectation:

“[We comply] because the OfS tell us to – we can’t not do it, it’s a requirement, it’s the not the only reason but it’s a driver because if we didn’t we would become disconnected from the OfS which would not be a good place to be.”

Staff member, provider

The Student Registrar has sole responsibility for meeting the requirement, and they do not have supporting budget for this work. It is now embedded and established within their student enrolment process, but is limited in scope. The Registrar reports that it’s “quite a small part of our comms with students” and that “it’s literally a case of sending a few emails at a few points in the year.”

As most students live locally the Registrar does not see their location as a barrier, although the absence of a conventional campus limits their potential activities.

Awareness of and general views on the Condition

The Registrar first became aware of the Condition around August 2019 via guidance documents from the OfS. Whilst communications have conveyed the purpose and necessity of compliance, this provider feels it is lacking guidance, particularly for small institutions. The Registrar says that they are willing to do more, but only following greater clarity on how they should be meeting requirements. In particular they are unclear on how they should be working with the ERO:

“They could tell us how this process of working or partnering up with the Electoral Registration Office - maybe it’s not their job to tell us – but there doesn’t seem to be a process for working it out – or maybe defining a bit more effectively what facilitating the electoral registration actually means or giving examples.”

Staff member, provider

The Registrar suggests the guidance indicates EROs will approach providers. As this hasn’t happened they don’t know how they should be liaising with them. The Registrar suggests that this confusion has not only prevented collaboration, it has stifled potential for investment in solutions for more efficient electoral registration. Their institution has considered installing the data sharing platform JISC, and this was discussed with their Director of Finance. However, because they were uncertain how much they should be doing - and the lack of spare capital within a small institution - it was agreed that this investment wasn’t a priority.

Compliance with the Condition

The provider has never been contacted by their ERO, nor do they believe they have had a reason to contact them.

“As the institution I don’t think it’s our job to actively seek them out and the guidance suggests that as higher education providers we comply with requests from them, so I don’t feel that it’s on us to set up that relationship or the contact point.”

Staff member, provider

This position contrasts with the position of an ERO in a neighbouring London borough, where many of the provider’s students reside. They claim to be proactive in contacting and working with local institutions, and that the providers they work with know who the EROs are and how they should be using relevant information. They claim that outreach is not frequent but it is regular. However, the activities they report concentrate on the large institutions in their area with the largest student bodies. It may be the case that smaller institutions are being overlooked for outreach and support by EROs, particularly if those institutions are located outside their own borough.

Of the providers they engage with, the ERO reports generally positive relationships; most universities are familiar with the requirements and are helpful. They have only experienced difficulties with one (who initially insisted on all requests for information pass through their lawyers). They report it is becoming easier for universities to collect and share information, which has resulted in less chasing from EROs. However, they believe providers could do more to integrate electoral registration at student enrolment, and that it is still not considered important enough within institutions. They argue that government should do more to communicate the importance of this work to providers:

“[Ideally] it’s not just us asking for information, it’s also seeing if we can help with [institutions] as well...sometimes they don’t understand that it’s providing a benefit to the students. In all things with registration where you get a lack of take up, it’s often because they don’t understand what it means...it’s all about education, it’s all about understanding why we want people to register.”

Electoral Registration Officer

Activities to facilitate student electoral registration

To date the only activity the provider has instigated is including electoral registration in their email checklist to students at enrolment. This action has only been instigated because of the Condition.

The Student Registrar would consider integrating the activity into other communications, such as a dedicated webinar or adding it to their regular ‘Question Time’ forum. They are reluctant to do this in the absence of reassurance and advice from their ERO on what is required and what would improve engagement. If they had this: “we’d have more to promote, more to say and there would be an actual process rather than just a promotional process.” They would value working examples of how other small institutions have successfully engaged students on the issue.

As the provider has not invested in a data solution for this issue, they are unable to measure performance. They have also not surveyed students on their engagement or understanding. During the COVID-19 pandemic more communications are being sent electronically. The Registrar suspects that Electoral information may have been overlooked by many students, simply because they have received so many other communications via this channel.

The students' union is small, unaware of the Condition and generally only provides sporadic messaging (via email and social channels) on electoral registration close to elections (taken directly from Government content). As a specialist institution the student body is generally not engaged with political issues, instead focusing on personal needs and development.

