The Electoral Registration Pilot Scheme (England and Wales) Order 2017; and The Electoral Registration Pilot Scheme (England) (Amendment) Order 2017

Equality Impact Assessment

February 2017

1. Introduction

This document considers equality impacts in the context of the pilots being enabled by the *Electoral Registration Pilot Scheme (England and Wales) Order 2017* and the *Electoral Registration Pilot Scheme (England) (Amendment) Order 2017*, assessing the likely impact on the following protected characteristics covered by the general equality duty:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex and
- sexual orientation

The document also sets out the consultations that have taken place to assist with development of the proposal and assessing the impacts.

This Equality Impact Assessment (EQIA) builds on the EQIA for the introduction of Individual Electoral Registration (IER), completed in June 2011 as part of the overall Impact Assessment document. It assessed the impact of IER on the protected characteristics and set out the outcome [1] of consultation with representatives of these groups and the plans for understanding the more effective ways to communicate with these groups and provide opportunities for them to register

[1] The impact assessment is available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61284/individual-electoral-reform-impact-assessment.pdf

to vote. See **Annex A** for details of the 2011 EQIA. The EQIA was updated in April 2012 – see **Annex B**.

2. Description of the legislation being assessed

These Orders establish a pilot scheme giving Electoral Registration Officers (EROs) in specified areas of England and Wales wider discretion over the manner in which they conduct the annual canvass. EROs in the specified areas will be required to contact a person at each residential address at least once during the pilot period but the manner in which they do so, and whether they take further steps where no information is received in respect of a particular address, will be at the ERO's discretion. EROs must complete their pilot activity by 2nd February 2018. The Electoral Commission (EC) is required to complete a report evaluating the pilot scheme by 29th June 2018. The Cabinet Office (CO) will also conduct an assessment of the canvass pilots. The Order will cease to have effect on 6th July 2018.

3. The annual canvass

The annual canvass is the process by which EROs maintain their registers. The prescribed steps in law for conducting the canvass require EROs to send a canvass form (Household Enquiry Form (HEF)) to every property in their area. The HEF asks those resident to state whether there have been any changes in the composition of the household. The information gathered is used to identify where individuals may have moved and their eligibility to remain on the register needs to be considered (an elector cannot be deleted from the register based solely on a HEF response), or where people are missing from the register who may need to be invited to apply to register. EROs are also required to issue two written reminders and carry out at least one visit to any non-responding properties. IER was introduced in Great Britain during 2014 to make registering to vote easier, more secure and less vulnerable to fraud. It requires electors to register to vote individually rather than by household. Before an

individual can be added to the register they must be verified through the cross checking of their information against trusted public data sources. However there are associated extra processing, printing and resource costs for the A3 HEF and the invitation to register form (ITR). Under the previous system, EROs were required to contact and chase responses from 27 million households annually; under IER, this obligation remains but with an additional burden to contact and chase potential new electors individually as well as source evidence to support the removal of electors who have changed address from the register. It is this two stage process which has generated extra cost. Previously, unless the ERO had specific concerns about eligibility, electors identified through household contact were nearly always added to the register without further action.

The annual canvass therefore serves as an information gathering exercise on potential additions and deletions to the register. It is not a registration exercise on its own as any potential eligible electors identified by returned HEFs must still successfully register individually before they are added to the register. Equally, information on any potentially no longer eligible electors returned on a HEF must be corroborated by another piece of evidence before it can be used to remove an elector from the register.

4. Canvass Piloting Activities

Piloting activity on the 2016 annual canvass was conducted in three areas in England - Birmingham, Ryedale and South Lakeland - allowed by the Electoral Registration Pilot Scheme (England) Order 2016.

The Electoral Registration Pilot Scheme (England and Wales) Order 2017 allows for piloting activity in in additional areas of England, as well as areas in Wales, on the 2017 annual canvass. The Electoral Registration Pilot Scheme (England) (Amendment) Order 2017, will allow the three participating authorities from 2016 to also partake in the pilots in 2017. Further legislation, the Electoral Registration Pilot Scheme (Scotland) Order 2017, allows for the same piloting on the annual canvass in two areas of Scotland.

The canvass pilots will allow EROs greater freedom over how they maintain their register so that they can avoid undertaking prescriptive processes which are both costly and may not be the best way to achieve the desired response. The pilots are aimed at providing evidence towards a future permanent change to the registration framework to allow all EROs to maintain their registers in a more cost effective way. Piloting on the annual canvass in 2016 in three English areas generated initial positive evidence towards future change; however further piloting has been deemed necessary in order to generate enough evidence to inform the exact approach to permanent change to the annual canvass.

There are a total of four “models” of piloting activities operating across GB in the 2017 pilot scheme. Each model has been created based on proposals from EROs, and each participating ERO has chosen the model they would like to apply to their area. These models are:

- Model 1 - Household Notification Letter (HNL)
    - All households in treatment group: HNL > updated HNL if changed

  Under this model, the ERO will send all households in the treatment group a Household Notification Letter (HNL) instead of the standard Household Enquiry Form (HEF). This letter lists all of the electors currently registered to vote in that household. An elector only needs to respond to the HNL if a change is needed.

- Model 2 - Email
    - Email held: e-HEF > email reminder > postal reminder > door knock with letter
    - No email held: Postal HEF > postal reminder > door knock with letter

  Under this model, an electronic HEF will be sent to households in the treatment group by email where possible, or else issuing HEFs. These are ultimately chased with a household visit if necessary. Where no email is held by the ERO, households receive a postal letter followed by a household visit.

- Model 3 - Discernment
    - Group 1 (match): HNL > updated HNL if change
    - Group 2 (no match):
        - Email held: e-HEF > e-HEF reminder > postal reminder > door knock with letter
        - No email held: postal HEF > postal reminder > door knock with letter

  Under this model, the ERO will discern upfront the approach that will be used for properties. This discernment step could involve local data matching or assignment by ward or by ERO knowledge. Some properties will receive a Household Notification Letter, while

other households will be more actively canvassed where a change in household

composition is suspected. Where possible, communications will be sent to the "non-matching" properties by email, before being chased with a postal reminder and doorknock if necessary.

- Model 4 - Telephone
    - Phone number held: postal HEF > telephone call > postal reminder
    - No phone number held: postal HEF > postal reminder > door knock with letter

Under this model, the ERO will be able to chase non-responding households in the treatment group via telephone rather than via postal canvass forms or household visits. Where no telephone number is held by the ERO, households will receive two household letters followed by a household visit.

In addition to electors covered by the protected characteristics, there may be impacts on under-registered groups, such as:

- people living in care homes
- Special category electors:

    - overseas electors - HM Forces service voters - Crown servants and British Council employees - Declaration of local connection electors (people who have no permanent address or have no residential address) - Anonymously registered electors

These pilots are solely focused on gathering evidence on whether alternative approaches to canvassing are more cost effective compared with the current system. They do not seek to test whether certain approaches are able to maximise registration levels among certain under-registered groups. Local authorities (LAs) submitting pilot proposals were asked to consider the impact on these groups in addition to those groups protected under the Equality Act 2010, if any.

5. Local Authority areas

5.1 Model 1 - Household Notification Letter

The following areas of England and Wales will be undertaking Model 1 of the 2017 canvass pilots:

- Barrow-in-Furness
- Blaenau Gwent
- Newcastle

- South Holland
- Torfaen
- Wakefield
- South Norfolk
- Ryedale (continuing from 2016)

The planned pilot under Model 1, tests a very simple but radical change from the current canvass process. All households in the authority will be allocated into treatment or control groups, with

the former subject to the new activity and the latter the existing processes, in order to measure the impact of this change.

Households in the control group will still be canvassed through the issuing of a HEF and undertaking the prescribed follow up steps for non-responders (issuing of two written reminders and at least one visit to the property), in line with the current regulations. The treatment areas will not be sent HEFs and will instead be sent a Household Notification Letter (HNL). The HNL, sent by post, would list the details of everyone registered to vote in that household and advise that where the details held are no longer up to date, the household should do one of the following:

- Where a household has access to the internet, an online form can be used to notify the ERO of additions, deletions or amendments (and of 'no change').
- The online form will direct new electors to the IER Digital Service for registration, though the usual ITR process will apply if they do not take up this option.
- Anyone unable to go online will instead be able to ring the authority to make changes over the phone. The normal ITR process will then take place for any new potential electors.

If there are no changes to the details given in the HNL, no response will be required.

The issuing of HNLs will be supported by appropriate awareness raising activities in the media, on the council website and on social media. The pilot is expected to make the process more cost effective in the participating areas due to the fewer canvassers required to operate a door-knocking stage as currently prescribed. The pilot aims to demonstrate that the approach in the treatment areas can gather the same or better volumes and quality of information on population churn compared with the control areas, but at a lower cost. It also aims to show that the activity in the treatment area is better suited to the demographics of the

areas compared with the current canvass process.

Newcastle, South Norfolk, Torfaen, South Holland, Wakefield and **Blaenau Gwent** EROs do not expect any negative impacts on protected groups under the Equality Act 2010 as a result of participating in this pilot. **Ryedale** does not expect any new negative impacts on protected groups under the Equality Act 2010 as a result of continuing to participating in this pilot.

Barrow-in-Furness noted that there could be an impact on their elderly population, who prefer traditional forms of contact. To mitigate this, Barrow will continue to make available face to face and telephone contact. Barrow have high levels of rural deprivation and socio-economic disadvantage, and note that this pilot will free up resources which could help these areas. Face to face and telephone contact will still be available for these people. Barrow will also use tablets during doorstep canvassing to enable registration in real time of hard to reach groups.

5.2 Model 2 - Email The following areas of England and Wales will be undertaking Model 2 of the 2017 canvass pilots:

- Bath & North East Somerset
- Coventry
- Derbyshire Dales
- Hounslow
- Woking

The planned pilot under Model 2 tests the use of email HEFs. All households in the authority will be allocated into treatment or control groups, with the former subject to the new activity and the latter the existing processes, in order to measure the impact of this change.

Households in the control group will still be canvassed through the issuing of a HEF and undertaking the prescribed follow up steps for non-responders (issuing two written reminders and at least one visit to the property), in line with the current regulations. Depending on whether an email is held by the ERO, treatment groups will either be sent a customised email HEF or a customised postal HEF, instead of the usual HEFs which the control groups would receive. Where an email is held and an elector provides a response to the initial customised emailed HEF, the ERO will make a decision on the next steps. If an elector has not provided any response on any of the reminders (including a paper reminder delivered by post), the ERO will make a final contact by delivering a customised letter. Where an email is not held, an elector will be contacted by post, if there is no response the ERO will send a reminder. If

there is still no response, the ERO will conduct a household visit delivering a customised letter if there is still no response.

The pilot is expected to make the process more cost effective in the participating areas due to the fewer paper canvass forms with pre-paid envelopes being issued throughout the process, as well as requiring fewer canvassers to operate the door-knocking stages as currently prescribed. The pilot aims to demonstrate that the approach in the treatment areas can gather the same of better volumes and quality information on population churn compared with the control areas, but at a lower cost. It also aims to show that the activity in the treatment areas is better suited to the demographics of the areas compared to the current canvass process. The pilots will also provide evidence towards a decision as to whether or not a permanent change should be made to legislation to remove the strict requirements around the annual canvass. If a permanent change was made, it would mean local and national resources would be released, presenting an opportunity to tackle the problems of under-registration longer term.

Coventry, Derbyshire Dales, Hounslow, Woking and **Bath & North East Somerset** EROs do not expect any negative impacts on protected groups under the Equality Act 2010 as a result of participating in this pilot.

5.3 Model 3 - Discernment

The following areas of England and Wales will be undertaking Model 3 of the 2017 canvass pilots:

- Camden
- Salford
- Sunderland
- Birmingham (continuing from 2016)
- South Lakeland (continuing from 2016)

These pilots are based on amending the existing canvass process, with the authority divided into treatment and control areas. The control areas will still be canvassed by the issuing of HEFs in line with the current regulations. For the treatment areas, a person at each residential address in the area would still be contacted at least once in line with the pilot legislation but a range of different steps will be taken, instead of simply issuing up to 3 paper HEFs and conducting at least one door-knock.

Data matching with locally held data sources will be conducted first. Where the details of

at a property match the data source, the property will be sent a postal HNL. This will only

seek a response from the property if the information recorded within it is incorrect. Where the details do not match the data source, electors will be sent a customised HEF. If an email address is held for a member of the household, this letter will be emailed. Where it is not responded to within a certain period of time, a reminder email will be sent. If no email address is held, then the customised HEF will be posted.

These customised HEFs for unmatched electors will encourage residents to respond to either confirm that the details for the property remain up to date and there have been no changes, or to identify new occupiers and any other changes.

To ensure that they do not omit any of the harder to reach groups, EROs will send a second customised HEF to any non-responding properties (this will be sent by post, where neither the paper nor emailed HEFs received a response), and also subsequently undertake a door-knock exercise for any that still fail to respond.

The aim is to reduce costs through this range of steps to ensure a more cost effective approach compared with the current prescribed process. By data matching and issuing HNLs which don't require chasing, resources can be more streamlined and targeted at non-matching and non-responding properties. The participating EROs are not obliged to deliver one type of canvass to all electors in their area. Instead, EROs will be able to deliver a canvass that is appropriate for the varied areas and households they service and make savings through issuing HNLs and emails.

Birmingham and **South Lakeland** EROs do not expect any new negative impacts on protected groups under the Equality Act 2010 as a result of continuing to participating in this pilot.

Camden is an Inner London borough with a very transient electorate and an average elector churn rate of 40%. There are clusters of BME electors and a large student population of which a high percentage are foreign students ineligible to vote. The borough also has a large number of private rented residencies, which are growing in number. To ensure that they do not omit any of these harder to reach groups, Camden will send a first HEF reminder to any non-responding properties; a second paper HEF reminder will be sent to properties where the initial HEF and first reminder were sent by email; and will subsequently undertake a door-knock exercise for any properties that still fail to respond. Camden also seeks to use data and more targeted activity to increase the representation of under-registered groups. Ahead of the pilot, certain specific property categories will be excluded from the treatment group including care homes, student accommodation, hostels and other institutions which are already subject to specialised local canvassing due to the difficulty of getting responses. Camden will also focus personal canvassers for residents who are elderly, and for those households where English is not the first language, explanations of registration in a variety of

languages are available.

Salford has a large BME population, with a rapid increase in recent years of international migration, particularly of Jewish and Muslim religious groups. Potential translation issues in respect of electronic and hard copy registration communications have been noted, as well as an existing issue associated with eligibility to register due to nationality. Salford will offer access to translation services as required and continue to offer clear communications regarding eligibility to register based on nationality. Salford's young and elderly populations are both increasing; both of which are under-registered groups. As such, for the purposes of this pilot, Salford intends to

continue and enhance communications with older persons and young people via recognised groups and organisations on the alternative methods of registration contact (without reference to an official pilot).

Sunderland does not expect any negative impacts on protected groups under the Equality Act 2010 as a result of participating in this pilot.

5.4 Model 4 - Telephone

The following areas of England and Wales will be undertaking Model 4 of the 2017 canvass pilots:

- East Devon
- Luton
- South Oxfordshire
- Vale of White Horse

The planned pilot under Model 4, tests the use of telephone as replacement for the paper HEF. All households in the authority will be allocated into treatment or control groups, with the former subject to the new activity and the latter the existing processes, in order to measure the impact of this change.

Households in the control group will still be canvassed through the issuing of a HEF and undertaking the prescribed follow up steps for non-responders (issuing of two written reminders and at least one visit to the property), in line with the current regulations. Although all treatment groups will be sent postal HEFs, the groups will be split into two, based on whether the ERO has a telephone number or not. If a phone number is held they will be given a first reminder by telephone and if there is still no response they will be given a second reminder through post. If a phone number is not held, they will be given first reminder through the post and if there is still no response, the ERO will conduct a household visit, where they

will deliver a customised letter if there is still no response.

The pilot is expected to make the process more cost effective in the participating areas due to the fewer canvassers required to operate a door-knocking stage as currently prescribed. The pilot aims to demonstrate that the approach in the treatment areas can gather the same or better volumes and quality of information on population churn compared to the control areas, but at a lower cost. It also shows that the activity in the treatment area is better suited to the demographics of the areas compared with the current canvass process. By using phone numbers to contact electors, resources can be more streamlined and targeted at non-responding properties, which will require fewer household visits and fewer postal HEFs in pre-paid envelopes. The participating EROs are not obliged to deliver one type of canvass to all electors in their area. Instead, EROs will be able to deliver a canvass that is appropriate for the varied areas and households they service and make savings through using phone numbers and postal reminders.

South Oxfordshire & Vale of White Horse do not expect any negative impacts on protected groups under the Equality Act 2010 as a result of participating in this pilot.

East Devon has 28.8% of residents aged 65 or over, whom they note could be impacted by the pilot. The ERO aims to make publically available plenty of information about the registration services through various access points for the elderly eg. age concern, Citizen's Advice Bureau,doctors surgeries and libraries. Residential homes, special category electors and

anonymous/homeless electors will not be part of the treatment group in East Devon in order to ensure they are not disadvantaged by the pilot.

Luton note that 122 languages are spoken in the area. However, any potential impact on those without English as a first language will be mitigated early in the project by ensuring a cross section of those undertaken the pilot who are bilingual, and offer access to an existing telephone translation service.

5.3 Conclusion

The Cabinet Office has considered the views of the participating Local Authorities in relation to the impact of these pilots on protected groups and under-registered groups, is content that any potential impacts on these groups will be addressed by the approaches proposed by the Local Authorities.

6. Permanent change to the annual canvass

These pilots will provide evidence towards a decision as to whether or not a permanent change should be made to legislation to remove the strict requirements around the canvass. If the evidence from the pilots supports proposals to make a permanent change, it would mean local and national resources would be released, presenting an opportunity to tackle the problems of under-registration longer term.

Additional work in this space is being undertaken as part of the wider programme of work to support the accuracy and completeness of the electoral register, for example through work with civil society organisations. The Government is therefore taking steps to ensure that the voluntary act of registration is encouraged and promoted, including amongst groups that are currently under-represented.

7. The evidence base for under-registered groups

The EC Reports *The quality of the 2014 electoral registers in Great Britain* and *Assessment of* [2] *December 2015 Electoral Registers in Great Britain* highlight some of these under-registered [3] groups:

- *Private renters* – private renters are more likely to change their address and they are also less likely to be registered than people who own their own home.[2]
- *BAME groups* - completeness was higher for people whose ethnicity was white (85.9%) while those whose ethnicity fell into the 'Other' category reported the lowest level of completeness (62.9%). Those with Indian ethnicity had a higher level of completeness than Pakistani and Bangladeshi people. Among black people, those with Caribbean origin had a higher registration rate than those with African origin.[2]
- *People with disabilities* - people with a physical disability were more likely to be registered (91.3%) than those with a mental disability (81.1%).[2]
- People classified as *social grade DE* are less likely to be registered than other social grades.[2]

[2]Electoral Commission (July 2014) The quality of the 2014 electoral registers in Great Britain http://www.electoralcommission.org.uk/our-work/our-research/electoral-registration-research

[3]Electoral Commission (February 2016) Assessment of December 2015 electoral registers in Great Britain http://www.electoralcommission.org.uk/our-work/our-research/electoral-registration-research

- *Attainers* - There has been a reduction of 40% in the number of attainers on the parliamentary register since February/March 2014.[3] Whilst the EC has not yet completed a

more recent study of under-registered groups, we would expect processes around registration of attainers to improve now that IER has been established as the registration system.

● *Students* - The two authorities that reported the largest drop in the number of register entries in 2014 are the two areas with the highest concentration of students.[3] Following the recent EU referendum, the electoral register is likely at its highest level yet; however, there is still a need to better understand and improve registration rates for students, particularly when students are choosing to remain registered at their home address.

8. Engagement with under-registered groups

The introduction of IER included ongoing engagement with under-registered and hard to reach groups of citizens:

● The introduction of online registration made it quicker and simpler to register, anybody can apply online in just a few minutes from their smartphone, tablet or PC. It has proved particularly popular amongst young people, a typically under-registered group. 74% of the 16.8 million applications under IER to date have been made online. Over £14m has been invested over the last two financial years to support activities aimed at increasing levels of voter registration, including activities aimed at engaging the most under-registered groups.

● In 2015/16 every ERO in Great Britain received a share of £6.8 million with allocations based on levels of under-registration in different areas.

● Up to £2.5 million funding was made available to fund wider activity, including national initiatives. This funded activity to encourage specific under-registered groups such as overseas electors, students and armed service personnel to register to vote. It also included up to £500,000 to support efforts to boost confidence in the integrity of the electoral process in areas where a number of allegations of impropriety have been made in the past. Organisations which have received funding include Operation Black Vote, the British Youth Council and Citizen's Advice. £530,000 has been given to student organisations to improve student registration.

9. Consultation and engagement undertaken regarding the canvass pilots policy

The following organisations were consulted on this legislation:

Association of Electoral Administrators SOLACE Elections & Democracy Board

Welsh Government Wales Office

Department for Communities & Local Government (DCLG)

Cabinet Office Practitioner Panel of electoral administrators

Government Equalities Office (GEO) Ministry of Justice

Participating Local Authority areas for 2017 Electoral Commission

Information Commissioner's Office

The Government Equalities Office sought Cabinet Office clarity on the impact of the canvass pilots on electors with protected characteristics, specifically relating to household visits to transgender electors. The Cabinet Office confirmed that, in the same way as the 2016 annual canvass pilots (as allowed by Electoral Registration Pilot Scheme (England) Order 2016), household visits are part of the existing IER process, and that the pilots should in fact reduce the need for these.

10. Timescale for implementation

The pilot scheme will be implemented for the specific areas from 30th June 2017. Until this time, current electoral registration legislation and processes will remain in place. The legislation will cease to have effect on 6th July 2018.

11. Evaluation of the proposals

The Electoral Commission will evaluate the pilot scheme and publish their report by 29th June 2018. The Cabinet Office also intends to evaluate the pilot scheme.

12. Contact details

For further information regarding this EQIA please contact **Annes Llwyd** at the Cabinet Office, tel 07736 485 431: email **Annes.Llwyd@cabinetoffice.gov.uk**

Annex A

Equality Impact Assessment (EQIA) for IER

An Assessment EQIA for the document introduction [4]

to identify of IER likely was completed equality issues. in June It assessed 2011 as part the impact of the overall of IER on Impact the protected characteristics; it also set out the outcome of consultation with representatives of these groups and the plans for understanding the more effective ways to communicate with these specific groups and provide opportunities for them to register to vote. The assessment concluded that the move away from a household electoral registration system should have an overall positive impact through providing each eligible individual with the right and responsibility to register themselves to vote, rather than being dependent on another member of the household. It emphasised the need to be conscious of other groups such as those that are under-represented on the register through disengagement, being unaware of entitlements and responsibilities, or access difficulties, as well as making the system convenient and efficient for all users. The likely impact on only some of the protected characteristics were specifically covered in the EQIA however:

Characteristic Commentary Age The EC Report *The completeness and accuracy of electoral registers in*
Great Britain (March 2010) indicated a higher than average under- registration amongst certain groups, including 17-24 year olds (56% not registered).
Consultations have commenced with a number of civic society groups who represent a variety of social groups that are currently under-represented on the register and that may be impacted by the policy including youth and the aged. The objective of these consultations is to better understand the issues associated with these groups, how to better engage people in the process of individual electoral registration and how best to communicate the changes in order to help mitigate the risk of continued under-registration in these groups.
In 2014 a proportion of the eligible voting population will not be contacted through a proposed mail-out based on the June 2014 electoral register. These include attainers; this target group are unlikely to have had any prior exposure to the electoral registration or voting process, and until turning 16, are unlikely to have had any individual contact with public services (previous contact would likely have been as a dependant on their parents). As they are not included on any previous electoral registers prior to the implementation of individual registration, unless targeted they may not register. Disability It is noted that the need for face to face contact may have an impact on
those with particular disabilities and those with mobility problems. It is

[4] The Impact Assessment is available at:
https://www.gov.uk/government/publications/individual-electoral-registration-draft-legislation

anticipated that this will affect a small proportion of eligible electors and will be used as a last resort in order to verify entitlement. Whilst all efforts will be made to reduce the impact on affected electors, this is a necessary part of the process.

Consultations have commenced with a number of civic society groups who represent a variety of social groups that are currently under-represented on the register and that may be impacted by the policy including disability. The objective of these consultations is to better understand the issues associated with these groups, how to better engage people in the process of individual electoral registration and how best to communicate the changes in order to help mitigate the risk of continued under-registration in these groups.
Race The EC Report *The completeness and accuracy of electoral registers in*

Great Britain (March 2010) indicates a higher than average under-registration amongst certain groups, including black and minority ethnic (BME) British residents (31%).

Consultations have commenced with a number of civic society groups who represent a variety of social groups that are currently

under-represented on the register and that may be impacted by the policy including Black and Minority Ethnic. The objective of these consultations is to better understand the issues associated with these groups, how to better engage people in the process of individual electoral registration and how best to communicate the changes in order to help mitigate the risk of continued under-registration in these groups.

Annex B

Update to the EQIA April 2012

The EQIA was updated in April 2012 and published alongside the Electoral Registration and Administration Bill . It stated that equality considerations had been taken into account in [5] developing IER and that CO would continue to look at ways to make the system more accessible to underrepresented groups and those with special requirements. One aspect of this was the exploration of additional channels for registration, including the potential to make an application online – a proposal welcomed by many groups representing disabled people.

The EQIA explained that CO had hosted a series of roundtable events focussing specifically on the impact of IER for accessibility, youth and BME groups, CO undertook a public consultation on the proposals and over 100 organisations responded, including

under-represented groups, disability groups, gender groups, students and BME groups.

The document explained that CO would work with the Government Digital Service (GDS) to design the online solution and that specific research would be carried out with those from disability groups to ensure that their approach meets and exceeds all of the required accessibility standards.

The need for public engagement emphasised in the EQIA was addressed through the communications campaign conducted by the EC during 2014 and through the registration drive in early 2015 following the £10 million maximising registration funding. The use of confirmation to automatically confirm 87% of electors registered before the move to IER onto the new system ensured that most people moved from the old system to the new one and that this was designed and achieved with the simplicity and ease of all users in mind.

[5] The EQIA is available at:
http://services.parliament.uk/bills/2012-13/electoralregistrationandadministration/documents.html