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# Reform of the Annual Canvass

## Statement of Policy

September 2019

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## 1. Introduction

- 1.1. This document provides an overview of planned reforms to improve the annual canvass of electors undertaken each year by Electoral Registration Officers (EROs) across Great Britain. This final statement of policy reflects the feedback from the Autumn 2018 consultation on the policy proposals; as well as feedback from the statutory consultations with the Electoral Commission, the Information Commissioner's Office and continuing discussions between the UK Government, Welsh Government and Scottish Government. A summary response to these consultations is being published alongside this statement. The intention is to work with stakeholders and the devolved administrations to implement these proposals ahead of the 2020 canvass across Great Britain.

## 2. Overview

### The Current Canvass

- 2.1. The current canvass gathers information on potential additions and changes to, and deletions from, the register. Since the introduction of Individual Electoral Registration (IER) in 2014, further action is typically required to convert this information into actual changes on the electoral registers. The annual canvass is therefore no longer a registration process in itself, although it forms part of Electoral Registration Officers' (EROs') wider registration duties. EROs must individually invite potential new electors to apply to register, and verify their identity, before they can be added to the register. This process sits separately to the annual canvass but can, and generally does occur concurrently.
- 2.2. While the current canvass is effective overall in meeting its objectives, it is widely recognised to be outdated and cumbersome. The one-size-fits-all approach, incorporating numerous prescribed steps, takes little account of differences within and between registration areas. It is heavily paper based, expensive, complex to administer and stifles innovation. It is also clear that the current process leads to confusion for the citizen.

- 2.3. The annual canvass is only one of the many ways an ERO is able to find information to update their electoral register. It sits alongside year round activities such as mining other datasets (for example, council tax records) to identify residents who are not currently registered to vote, and specific targeted work for certain groups. Since the introduction of online electoral registration in 2014, there has also been a shift to 'event-led' registration, where millions of applications are now made in the run up to polls. That said, no major national polls were held in 2018 and data from the IER Digital Service shows that the number of registration applications were significantly up during the canvass compared to the previous few years. This reinforces the continuing importance of the annual canvass in maintaining the completeness and accuracy of electoral registers each year.
- 2.4. EROs in Great Britain are required to conduct an annual canvass of all residential properties in the area for which they have responsibility.
- 2.5. Section 9A of the Representation of the People Act 1983 (RPA 1983) places a duty on EROs to maintain the electoral register for their area. Section 9D of the RPA 1983 requires EROs to conduct an annual canvass of all residential properties in their area. This is supplemented by S.9A(2)(a) and (b) which provides that EROs must send the canvass form more than once and must make house to house inquiries on one or more occasion. Further provision in relation to the conduct of the annual canvass is made in Regulations 31FA, 32ZA and 32ZB of the Representation of the People (England and Wales) Regulations 2001 and the Representation of the People (Scotland) Regulations 2001.
- 2.6. The purpose of the canvass is to identify everyone who should be on the electoral register. This means identifying citizens who should be registered but are currently not, as well as identifying electors who are no longer at a property and should therefore be removed from the register. A revised version of the electoral register must be published by 1 December<sup>1</sup>, following the conclusion of the annual canvass.
- 2.7. EROs must send every household an annual canvass form (currently known as a Household Enquiry Form (HEF)). The HEF requires a response, regardless of whether there have been any changes in the household to report. Failure to respond is an offence and magistrates have the power to impose a fine of up to £1000. EROs must follow up any non-responses with a further two reminders and carry out a household visit, if required. The household visit can be conducted at any stage; any of the initial, first reminder and second reminder HEF steps can be combined with the household visit or it can be conducted as a separate process. Each paper HEF must be accompanied by an addressed pre-paid return envelope.

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<sup>1</sup> The publication of the revised register can be deferred until 1 February if there has been an election held in the area during the canvass period.

- 2.8. Pilots of alternative models for conducting the annual canvass were run in 2016 and 2017<sup>2</sup>. From the evaluation of the pilots it is clear that there is merit in enabling EROs to more effectively target their resources towards those properties where the occupiers have changed and the electoral register needs to be updated. This would allow them to ensure their resources are targeted at the properties which need it, with a more streamlined process for those properties where composition remains the same.
- 2.9. The Electoral Registration and Administration (ERA) Act 2013 contains a broad power in section 7 to amend or abolish the canvass in Great Britain through secondary legislation. The intention is to use this power (and powers to make and amend regulations provided by the 1983 Act) to amend the legislation governing the annual canvass during 2019. Our aim is for the whole of Great Britain to benefit from this reform from the start of the 2020 annual canvass.
- 2.10. Legislation will also need to be made in the Scottish Parliament and the National Assembly for Wales in relation to the local government registers in Scotland and Wales. Given this, three Statutory Instruments will be required - one taken forward by the UK Government in relation to the UK Parliamentary register in Great Britain and the local government register in England, and one taken forward by each of the Scottish and Welsh Governments in relation to the local government registers in Scotland and Wales.

### Objectives for Canvass Reform

- 2.11. The intention is that the legislation governing the reformed annual canvass is less prescriptive and therefore more permissive than is currently the case. The objectives of canvass reform are:
- to make the process simpler and clearer for citizens;
  - for EROs to have greater discretion to run a tailored canvass which better suits their local area;
  - to reduce the administrative burden on EROs and the financial burden on taxpayers;
  - to safeguard the completeness and accuracy of the registers;
  - to maintain the security and integrity of the registers; and
  - to include the capacity for innovation and improvement, with a model that is adaptable to future change.
- 2.12. The purpose of the reformed canvass of households will be the same as now, that is to find out:

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<sup>2</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719824/Piloting\\_Alternative\\_Electoral\\_Canvassing\\_Models\\_-\\_Full\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719824/Piloting_Alternative_Electoral_Canvassing_Models_-_Full_Report.pdf)

- the names and addresses of persons who are entitled to be registered, but who are not already registered;
- those persons who are on the register, but who are no longer entitled to be registered at a particular address (normally because they have moved).

2.13. We do not intend to amend the dates during which EROs conduct the canvass. It will remain a matter for EROs' discretion when they wish to start their canvass. The requirement to publish the revised register by 1 December each year will remain, as will the ability to defer publication of the revised register until 1 February if an election is held in their area within the canvass period.

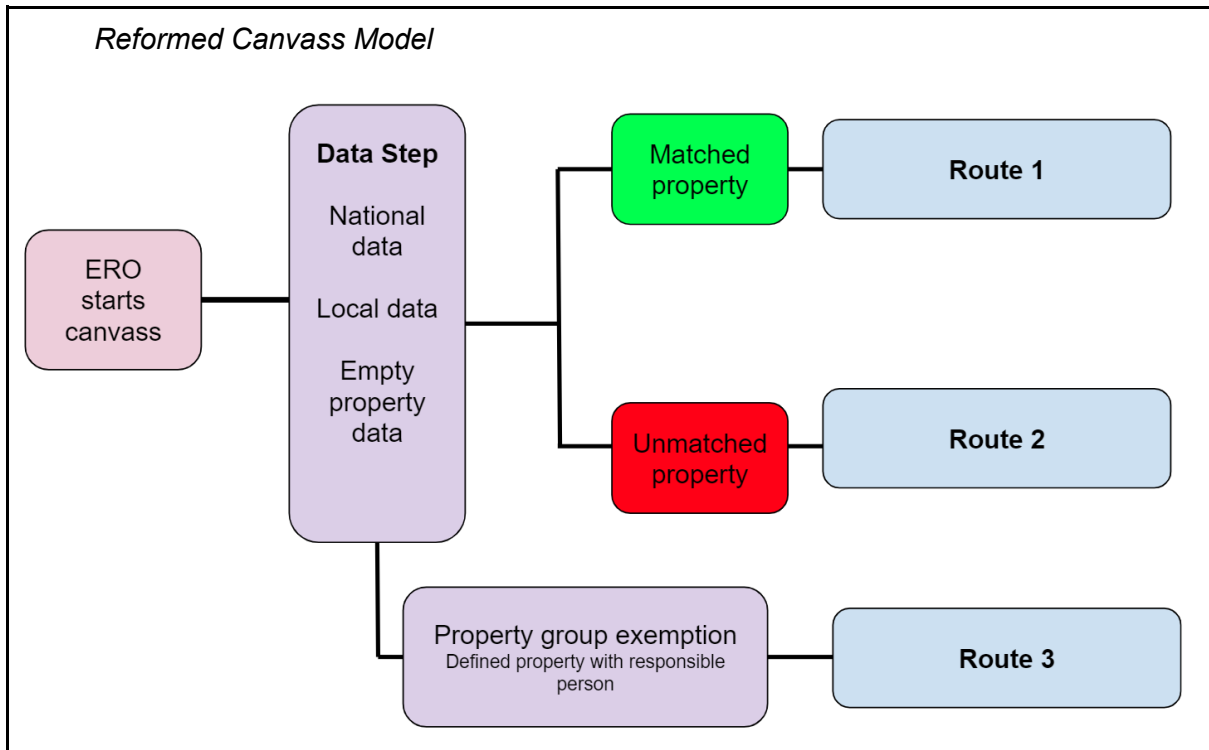
2.14. The annual canvass forms an integral part of the year round registration process. The need for EROs to complete exercises to find new electors throughout the year, and consistently maintain the accuracy of their registers (i.e. completing deletions throughout the year) will be instrumental to the successful implementation of the reforms. We will be working closely with EROs throughout implementation to ensure they have the capability and tools required to successfully carry out the reformed canvass process.

## 3. The New Canvass Model

### Summary

- 3.1. The new canvass will incorporate a 'data step' at the outset of the process. This will inform the ERO, based on the data available to them, which properties are likely to have an unchanged household composition, based on matching their data on registered electors against national Government data and, where relevant, locally held data sources. Where the data the ERO holds on registered electors matches data in another reliable and accurate dataset, the ERO can have some confidence that the details they hold on their register remain accurate. The ERO will then follow one of two routes for each property. Route 1, the matched properties route, will be used for properties where the data indicates no change in household composition. Route 2, the unmatched properties route, will be used for properties where data matching has highlighted that there may be a change to the information the ERO currently holds for the property. This will allow the canvass process to be streamlined for those households that have not changed since the previous year. It will enable the ERO to target their resources to where responses and updates to the electoral register are believed to be required. The draft legislation clearly states that electors in both Route 1 and Route 2 properties will be contacted during the canvass to give them the opportunity to inform the ERO of any changes as needed.
- 3.2. A third route, Route 3 - the defined properties route, will be available for property types which do not fit clearly within Routes 1 and 2. The characteristics of these property types mean that the ERO can more effectively and efficiently obtain information on residents using an alternative approach, where they are able to identify a 'responsible person' to provide the information in respect of all residents. Examples of these property types are care homes and student halls of residence. Should the ERO be unable to successfully obtain information about the property from a 'responsible person' they will need to canvass these property types using the Route 2 process. Properties eligible for Route 3 will be identified at the start of the canvass process, but will not be exempted from the data match step, which is explained in more detail in Section 6 below.
- 3.3. Consistent with the intention that every property will receive a canvass communication, the draft legislation removes the 'single occupancy tick box'. This was introduced in 2016 as part of a set of cost reduction measures ahead of wider canvass reform. Where an elector has indicated that they are the sole occupant of the property, and where no other available information suggests otherwise, the ERO can choose to exempt the property from the next canvass (or the current canvass, if one is already underway). The original thinking was this would reduce canvass costs as it would effectively allow EROs to exclude a proportion of properties from the canvass cycle.

- 3.4. However, in practice many electors were confused by the tick box. We understand that, due to this confusion, there was a high risk of incorrect reporting resulting in many EROs being unwilling to rely on the tickbox information and continuing to send the Household Enquiry Form. It is also illogical, under the reformed canvass, for a property with one matched elector to be sent no communication whilst a property with two would be. It is therefore removed in the draft legislation and this change will be reflected on the online Register to Vote website once the legislation is in force.

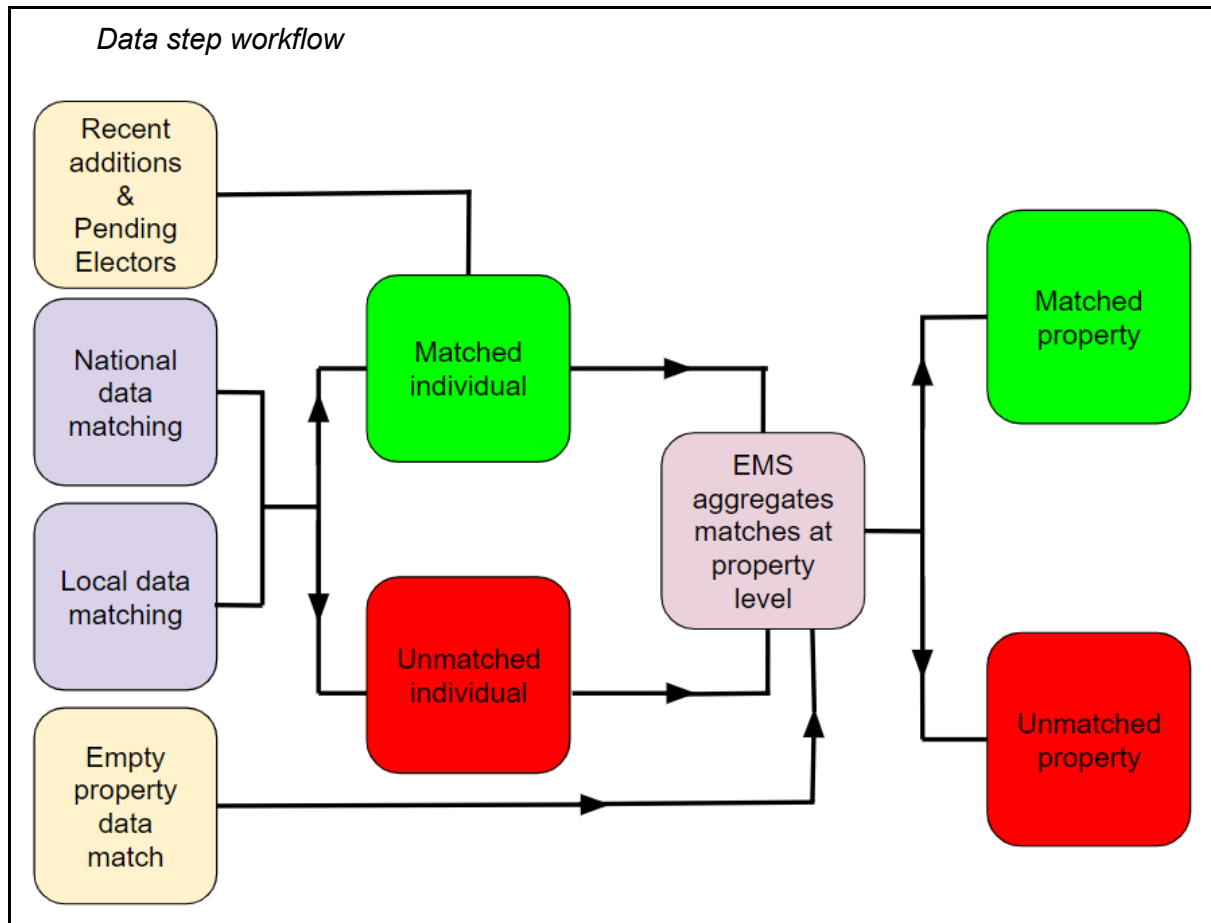


### The Data Matching Step

- 3.5. Under the reformed canvass, data matching will be used at the outset of the canvass to help identify those properties where the residents are more likely to have changed. All EROs in Great Britain will be required to match specified data they hold on registered electors against a national dataset. The draft legislation makes provision for the use of the data held at the Department for Work and Pensions data warehouse. This dataset is already used in the electoral registration process to verify an applicant's identity. Other national datasets may also be considered in the future.



- 3.6. EROs will have the discretion to match the data they hold on registered electors against local datasets, in addition to matching against the national dataset. These local datasets might include council tax records and other datasets held by their local authority. Local datasets are available to the ERO under their existing powers, provided by Regulations 23, 35 and 35A of the Representation of the People (England and Wales) Regulations 2001 and the Representation of the People (Scotland) Regulations 2001.



- 3.7. The data matching will occur at an individual elector level; matching name, date of birth (where held) and address (this should be in the form of string address and Unique Property Reference Number (UPRN) where available) for national data, and on name and string address or UPRN at a minimum for local data. Every individual sent for matching will receive a match score. This match score will deem the elector either matched or unmatched. These results will then be aggregated at a household level.

## National data matching

- 3.8. All EROs in Great Britain will be required to send the full name, date of birth (where held) and the address (in string form, as well as UPRN where held) of registered electors or attainers (i.e. including 16-17 year olds) for national data matching, checking the data they hold on registered electors against data held by the DWP. EROs will have the discretion to exclude some other electors from the data match - see 3.15 below.
- 3.9. The data will be sent via the Individual Electoral Registration Digital Service (IER DS) and matched against data held by the DWP. The IER DS is a series of interconnecting digital applications which govern the receipt, transmission, and processing of data, and is also used to process applications to register under IER. The process will be completed by the DWP with the IER DS used as a secure conduit to transmit the ERO's data to the DWP and, subsequently, to allow EROs to retrieve their DWP data match results.
- 3.10. For each ERO, this should be done at the start of their canvass process each year. Details on how the national data match step will be conducted will be provided to EROs through guidance and helpsheets from the Cabinet Office and the Electoral Commission.

## Local data matching

- 3.11. EROs will have the discretion to match their data on registered electors against locally held datasets, such as council tax and housing benefit data. They are able to access the local data using Regulation 23, 35 or 35A powers.<sup>3</sup> For some EROs, matching against local data will be an effective tool to ensure they have the maximum amount of accurate data to compare against their register. There may also be specific groups of people where local data is highly effective in identifying their current address.
- 3.12. In Scotland, 14-15 year old attainers will be excluded from the national data match step as they are unlikely to appear on the national dataset used. Instead, the ERO may match these individuals using local data, which is in line with the current process for verification checking on these young attainers. This will also apply to Welsh attainers once the Senedd and Elections (Wales) Bill 2019 receives Royal Assent and enters into force, which will lower the minimum voting age for the National Assembly and local government elections in Wales to 16.

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<sup>3</sup> The Representation of the People (England and Wales) Regulations 2001 and the Representation of the People (Scotland) Regulations 2001

- 3.13. EROs will be free to choose whether to match their whole register against a local dataset, or to use this selectively for those individuals who do not match against DWP data.
- 3.14. The most important aspect of the local data matching is that the ERO focuses on quality and accuracy when deciding what datasets to be used. The evidence gathered from the 2016/17 pilots show that the properties where there is a change to be reported should be routed into Route 2, the unmatched properties route, as this involves more touch points with the elector and more opportunities for change to be reported. Data of high accuracy and high quality will enable the ERO to accurately determine the correct route. However, should poor quality data be used this could result in properties that have changes to report going down Route 1. This could have a bearing on the effectiveness of the canvass. EROs will therefore need to give careful consideration to which datasets to use, utilising any guidance produced by the Cabinet Office in conjunction with the Electoral Commission.

### Exclusions from the data match step

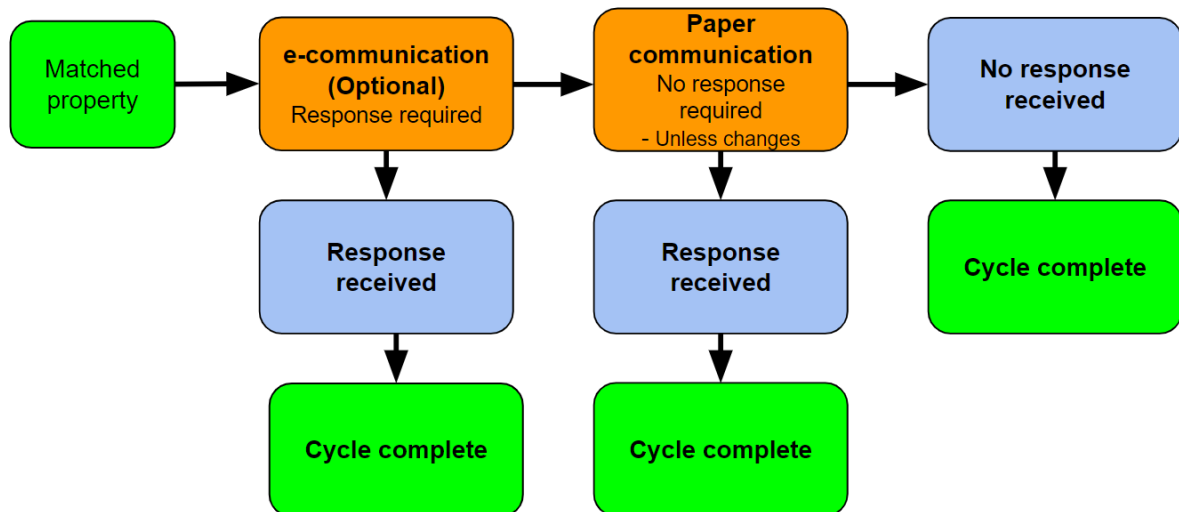
- 3.15. EROs will have the discretion to exclude some electors from the data step. The first group are those who have made a recent successful application. Recent additions to the register maintained by the ERO can be automatically classed as 'matched' in the data step. The rationale is that recent applicants should not need to re-confirm the details of their registration so soon after applying and, were they to be included in the data match, may fail to match due to the currency of data held in other datasets. EROs will have some discretion to decide what constitutes a recent addition. If an application was determined within a maximum of 90 calendar days prior to the day on which the ERO undertakes the data match, the ERO will be free to choose to exclude that entry from data matching. EROs will be able to set any maximum less than that, down to zero days.
- 3.16. Determined electors will be automatically excluded from the data match step. 'Determined electors' are those whose application to register to vote has been successfully determined by the ERO. However, they will not be added to the register until the next monthly alteration is published. Since they will not appear on a register at the point of the data match, the EROs will not submit their details for matching. We consider that this is a reasonable approach since no more than 30 days will have elapsed between the point of their determination and the data match step.

## Using the results of the data match step

- 3.17. The purpose of the data step is to help an ERO decide which route each property should be sent down. Matching will occur at an individual elector level, matching name, date of birth (where held) and address. National and local data matching will return a result of either 'matched' or 'unmatched' for individual electors. A matched result is where an individual's information was successfully matched against either DWP or local data, or both. An unmatched score is where some or all of the information sent for data matching has failed to match. For the national data match, an algorithm will determine, from the range of data points which match or fail to match, whether an individual is matched or unmatched overall.
- 3.18. If the ERO has decided to use Route 3 they will have the option of using the results of the data matching step to inform their determination as to the most appropriate route to use. However, where they have identified a Route 3 property in accordance with the stated criteria, they are not required to take into account the results of any data match in deciding whether to canvass using Route 3.
- 3.19. If EROs choose to match their whole register against local data, and the result is different from the result of the national match, it will be for the ERO to decide which of the match results they wish to use. As there will be no set hierarchy between national or local data matching results, the ERO may determine if they wish to accept a match from either dataset or, if they have more trust in one dataset above the others, they may determine to override a matched response with a more accurate unmatched response. The accuracy of the various datasets used will be essential to making an informed decision.
- 3.20. In practice EROs could choose to ignore a failed match against either national or local data, as long as the other data match enabled them to be satisfied no changes were necessary in respect of a particular property. However EROs couldn't override failed matches against both national and local data as it would not be possible for them to be satisfied no changes were necessary in respect of that property in those circumstances, and would not be in compliance with the required standards
- 3.21. Pilot studies undertaken by the Cabinet Office in 2012 show that the national data is highly accurate when indicating that an elector is currently resident in a property. The accuracy for a matched elector was 95%. The accuracy level is lower for electors who did not match. Whilst EROs can be fairly confident that a match against DWP data means the elector is still residing in the property, the reverse is not true for a non-match. Rather, it indicates a degree of uncertainty about whether the elector is still present. This means some electors who are unmatched and directed to Route 2 will respond to say they are still resident in the property.

- 3.22. Individual level matches will be aggregated within each ERO's Electoral Management Software (EMS) system for each residential property to create property level match rates. This is because the canvass operates at the property level, even under IER. For a property to be designated as 'matched', all the electors registered at the address will need to be matched at the individual level against either (or both) national or local data.
- 3.23. For properties that have been 100% matched at the individual level, the ERO can (but will not be required to) follow the Route 1 process. For properties where some, or all, of the registered occupants are unmatched, EROs must follow the more intensive Route 2 process. In this way, the data matching helps the ERO determine which properties go through a less expensive and less resource intensive process (Route 1), and which properties must go through the unmatched properties process (Route 2).
- 3.24. The option to canvass a property using Route 1 will only be available where the results of the data step lead an ERO to believe that there has been no change at a property in terms of registered residents. This means that all of the residents have been matched against national and/or local data, or they have recently been successfully determined or they are a recent addition to the register (as described above).
- 3.25. There is no requirement that a property must be sent down Route 1. EROs will retain the option to conduct a Route 2 canvass for any address. There may be some cases where EROs decide to conduct a Route 2 canvass for a property even when all the individuals at that address have been data matched.
- 3.26. EROs may also match properties where there are no current registered electors using local data. If EROs have sufficient data to confirm that the property is currently empty or should remain with no registered electors (i.e, there are residents, but none are eligible to be registered to vote because, for example, none meet the nationality criteria) then EROs will have discretion to treat it as a property that is unlikely to report a change and, therefore, send it down Route 1 process. If EROs do not have data to confirm that a property should have no registered electors, then the property must follow the unmatched properties Route 2 process.

## 4. Route 1 - The Matched Properties Route



### Overview

- 4.1. Route 1 will be a more streamlined approach to the annual canvass process, when compared to both the current legislated canvass and the new Route 2 canvass.
- 4.2. EROs will be required to send a communication to the occupant(s) of each property in Route 1. This will provide an opportunity and a prompt for residents at that property to inform the ERO of any changes. If the details which EROs hold on their registers in respect of the property are complete and correct, it will not be necessary for every household to respond to the canvass process.
- 4.3. There will be two options available to EROs: either to send a single prescribed written communication (Canvass Communication A) to the property, or to first send an e-communication and then follow up with the prescribed written communication (Canvass Communication A) to the property where there is no response. The e-communication will be entirely optional.

### Route 1 e-communication

- 4.4. EROs will have discretion, where they hold the necessary contact information, to send an e-communication to a Route 1 property in the first instance. 'E-communication' is meant in the broadest sense to mean email, SMS or any other form of electronic or digital communication.
- 4.5. The intention is to give EROs an opportunity to reduce printing and postage costs, staff processing time and promote channel shift, driving further savings.

- 4.6. Because an e-communication is linked to an individual and not directly linked to a property (in the same way as a posted communication is), a Route 1 e-communication will require a response to confirm that all the electors are still resident. If the elector fails to respond to an e-communication within a reasonable timeframe, an ERO will be obliged to send a Route 1 Written Communication to the Property (Canvass Communication A).
- 4.7. Where a Route 1 e-communication is sent, the addressee(s) must be asked to confirm that the details supplied for everyone resident in the household are complete and correct. Alternatively, if the details are incomplete or incorrect, the addressee(s) will be obliged to inform the ERO and provide the correct details. EROs will be free to use an online response service for responses if they so wish. When using an e-communication, it will be mandatory to send the contact to each elector at that address for whom the ERO holds the relevant contact details (e.g. e-mail address or phone number in the case of SMS). This is so as many individuals as possible have the ability to receive the e-communication.
- 4.8. If they are successful in eliciting a response to the e-communication within a reasonable time, EROs will be able to close the process without sending a Route 1 written communication.
- 4.9. Where the ERO has received information from the property, or a previous resident of the property, that suggests that household composition has changed, without having received sufficient information to close the chasing cycle, they will need to send the property down Route 2 (see section 5).

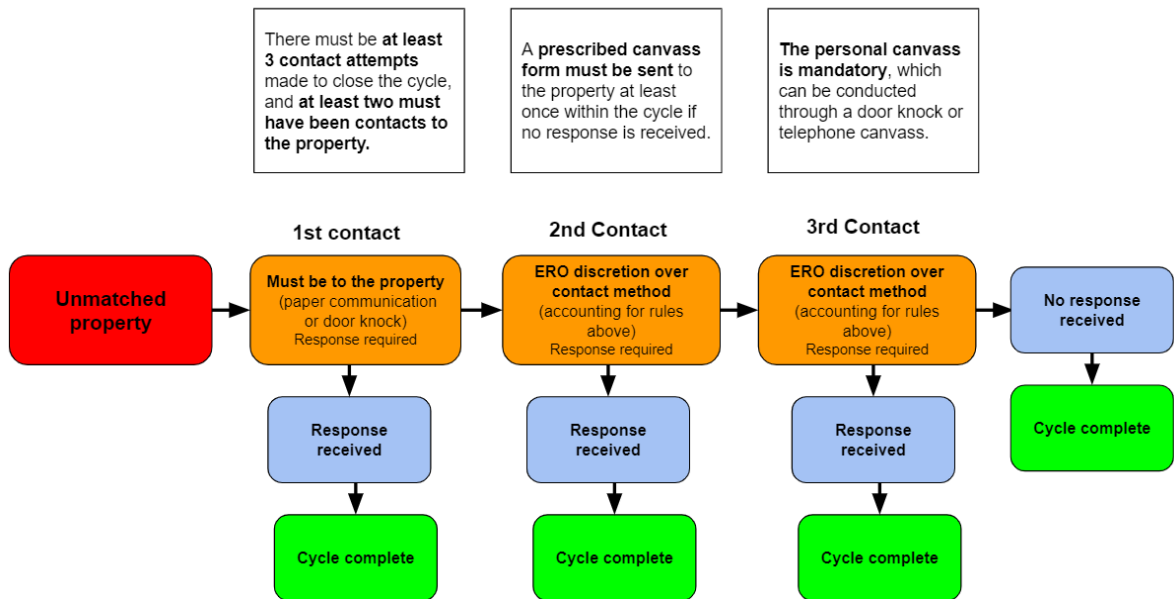
### Route 1 Written Communication to the Property (Canvass Communication A)

- 4.10. EROs will be required to send a prescribed Route 1 written communication, Canvass Communication A, to all properties who have not responded to an e-communication. This will either be due to the ERO not holding the relevant contact information in order to send an e-communication; the ERO choosing not to send an e-communication; or the residents not responding to the e-communication in a reasonable time.
- 4.11. Although occupiers will be obliged to let EROs know if the information presented in the communication is inaccurate or incomplete, there will be no requirement for them to respond to a paper canvass communication where they have no change to report. Consequently under the reformed canvass model, there will be no requirement for EROs to follow up non-responses to the Route 1 prescribed written communication (Canvass Communication A). EROs will not be required to send any reminders to the property or conduct a visit. This communication may be accompanied by a pre-addressed, pre-paid envelope or a Freepost address may be included if the ERO so wishes, but there will be no requirement to include one.

- 4.12. The data matching step will have given EROs a reasonable degree of confidence that there has been no change at the address. The occupants of a property will have had an opportunity to say there has been a change. If they do not, EROs can reasonably assume that their register is accurate for that property and close the canvass for that property. This will significantly reduce costs and administrative burden for registration officers.
- 4.13. It will be an offence to fail to notify the ERO of a change in response to a Route 1 canvass communication. It will also be an offence to supply false information.
- 4.14. The Electoral Commission will have a duty to design the Route 1 prescribed written communication (Canvass Communication A) and EROs will be obliged to use the communication that the Electoral Commission designs. Legislation will prescribe that the Route 1 written communication should be pre-populated where the ERO holds the information required by the communication on electors resident at the property.
- 4.15. It will need to include the following minimum content:
- The full name and nationality of each registered elector aged 16 or over in England, and aged 14 or over in Scotland and Wales ;
  - A statement on how the data will be used and processed, in accordance with the relevant data protection legislation;
  - In England and Wales the ERO must, if they have the information, indicate whether individuals are aged 76 or over. This is necessary to enable EROs to fulfil their legal duties under the Juries Act 1974 and the Representation of the People Act 1983.
- 4.16. Canvass Communication A will also set out the following, but make it clear this information only applies where households have changes to report:
- A date by which a response should be provided;
  - Where a response is provided, whether online, by phone or using the form itself, the responder should declare that the information provided is true.



## 5. Route 2 - The Unmatched Properties Route



### Overview

- 5.1. Following on from the results of the data matching step, if the data suggests that there may be a change to the information EROs currently hold for a property on their register, they must follow the Route 2 process. In the case where the non-match is correct and new citizens have moved into the property, and/or former occupants have left, it will be vital for EROs to receive this change information. Equally, if the non-matched elector is still there, it will be important for EROs to receive confirmation of this in the form of a no change response. Both scenarios rely on the occupier returning a response to the ERO.
- 5.2. Route 2 will be similar to the current canvass process which is followed for all households. Nationally, we anticipate approximately a quarter of all households will need to go down the Route 2 process, although this will vary considerably from one area to another depending, for example, on whether it is an area of high or low population churn.

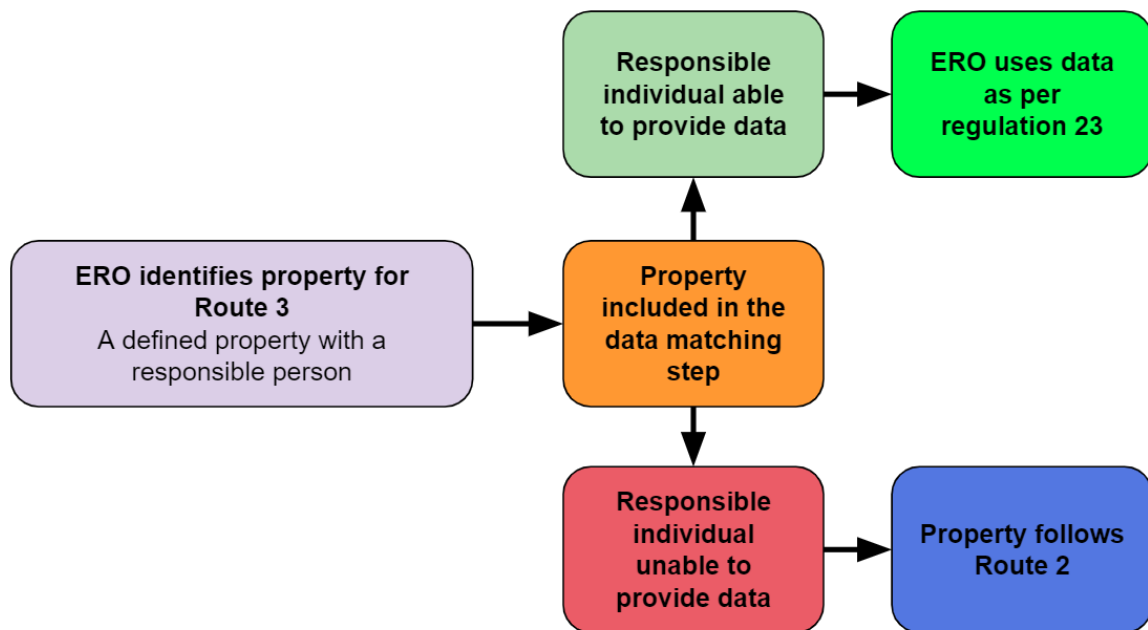
## The three contact cycle

- 5.3. Under the Route 2 cycle EROs will be required to meet the following minimum requirements:
- A minimum of three contact attempts must be completed during the canvass process.
  - The first contact attempt must be a communication with the property (written or household visit), rather than with an individual.
  - A further contact in the process must also be with the property.
  - A personal canvass (telephone call to a matched elector or household visit) is required, if no response has been received, as part of the canvass cycle.
  - The prescribed Canvass Form must be sent at some point in the cycle, along with a prepaid, pre-addressed envelope.
- 5.4. It is important the ERO makes contact with the property in the first instance as Route 2 will apply where the data matching reveals some doubt about the current residents at the property.
- 5.5. In practice, the first contact attempt with the property will require the ERO to either send a written communication to the property or to carry out a household visit. There will be two options available to EROs in regards to sending a written communication to the property; a prescribed written communication (Canvass Communication B), or a prescribed Canvass Form. The Electoral Commission will be responsible for designing both of these communications.
- 5.6. Should the ERO not receive a response from the property within a reasonable time the ERO will follow up with a second contact stage. If the ERO does not receive a response to the second contact stage within a reasonable time, they should follow up with a third contact stage. EROs will have discretion over the contact method for the second and third contacts, which might be by post, email, SMS text, telephone, household visit or by another electronic communication method. This will enable the ERO to tailor their approach to the area and the electors/properties involved. Importantly, the 2016 and 2017 Canvass Pilots showed that a mixture of communication methods can be more effective than repeated uses of the same communication method.

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- 5.7. Where the ERO holds email addresses or mobile phone numbers, they may choose to send an e-communication as the second or third contact stage. If so they will be required to send e-communications to all matched electors who they hold relevant contact details for. This is because it is likely to increase the chances of successfully contacting the household and prompting a response, and e-communications to only one matched elector may raise suspicions of phishing.
- 5.8. As part of the Route 2 cycle a personal contact attempt is required. A household visit or a telephone call would both meet this requirement. If the ERO chooses to use telephone calls to meet the personal contact requirement they will be required to call all matched electors at the property for whom they hold a contact number, unless they receive a response.
- 5.9. If a response is received at any stage, the chasing cycle will be closed and no further canvass contacts will be required (although the ERO may need to start the Invitation to Register (ITR) process for individuals whose names have been added to the returned form, or the deletions process for electors who no longer appear to be resident, or for other changes such as a change of name).

## 6. Route 3 - The Defined Properties Route



### Overview and eligibility

- 6.1. The starting point for all non-matched properties will be the Route 2 process. However, EROs will be able to decide to follow a different canvass process for certain types of property. This exemption process should be applied for certain property types that cannot be canvassed as effectively using the Route 1 or Route 2 process.
- 6.2. The ERO will have the discretion to choose Route 3 where the property in question meets one of two characteristics of a relevant property and EROs have successfully identified a responsible person who lawfully holds information on the residents of the property. An ERO would need to approach the responsible person to seek the required information using their existing powers<sup>4</sup>. This route is optional and EROs may choose not to utilise it.

<sup>4</sup> Regulations 23, 35 and 35A of the Representation of the People (England and Wales) Regulations 2001 and the Representation of the People (Scotland) Regulations 2001.

- 6.3. Properties which would be appropriate for use of Route 3 will be outlined in legislation and will have one of the following characteristics. They will be either:
- A property with multiple occupants who do not form a single household, in respect of which the ERO reasonably believes that s/he is more likely to obtain information about the occupants of the property from a responsible person; or
  - A property in respect of which the ERO has made an attempt to deliver a document in the previous 18 months, but has been unable to do so, and where the ERO reasonably believes that s/he is more likely to obtain information about the occupants of the property from a responsible person. (For example, the ERO may have been unable to deliver a document due to issues with postal delivery.) .
- 6.4. The following property types are examples of those that will be eligible for the Route 3 process:
- Registered residential care homes
  - HMO (Houses of Multiple Occupancy) registered with the Local Authority
  - Student Accommodation
  - Hostels
- 6.5. The draft legislation specifically excludes using Route 3 for an ordinary block of flats.

### Route 3 canvass process

- 6.6. EROs will need to consider, from one year to the next, whether they wish to make use of Route 3 in their forthcoming canvass. If they do, they will need to review if they still hold the relevant information for the responsible person and if the property still meets the criteria set out for these properties.
- 6.7. If the ERO commences the Route 3 process they will need to approach the identified responsible person, using the Regulation 23 power, to request the required information for all current residents. The minimum information the ERO should seek would be the full name, nationality and if the person is aged over 76 for England and Wales. Where they hold the data, the responsible person may also provide a telephone number and/or email address for each resident. In Scotland there is a requirement to request the date of birth of anyone aged 14 or 15.

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- 6.8. Where EROs are successful in gaining a list of eligible residents, the data provided will inform them who is resident at the address and correctly registered to vote, and individuals who are not registered but may be eligible to register. The ERO will also be able to determine who on their register appears to be no longer resident, enabling them to take the necessary follow up actions (such as a registration review). The EROs must then issue Invitations to Register (ITRs) to any individuals identified who are not currently registered, and chase them up as set out in legislation if they do not respond.
- 6.9. Where it does not prove possible for EROs to obtain the required information on the eligible residents from the responsible person within a reasonable period, EROs will be obliged to revert to the Route 2 process (regardless of the outcome of the data matching), as outlined above.

## 7. Canvass Reform Data Test

- 7.1. Between July 2019 and February 2020, a test of the new data matching step will be conducted. More information about the data matching step can be found in section 2 above. The Cabinet Office has issued guidance to support electoral administrators through the data testing process.
- 7.2. The national data test will involve the mandatory testing of national data from the DWP for all EROs. It will take place in early 2020 once the testing provisions in the Canvass Reform Statutory Instruments have come into force. Cuts of national data will be taken from the start of the 2019 canvass and matched with the start of canvass register. The match results will then be compared to the end of canvass register to allow EROs to plan resources, as the test results will tell the ERO what proportion of their electorate would have gone down Routes 1, 2 and 3. The results of the national data match test will be shared with EROs soon after the test takes place.
- 7.3. EROs will also have the option of testing local data sources. If they choose to do so, local data match testing will be conducted ideally during the 2019 canvass, and at the latest before the national data match test.
- 7.4. Testing local datasets before using them in a live data matching step under the reformed canvass will ensure that EROs are using local data only if it is beneficial. Local data should provide supplementary matches to the mandatory national data match, as if local data matches overlap with national data matches, the benefit of using those datasets will be limited. As such, it is strongly advised that EROs test any local datasets they wish to use under the reformed canvass before including the data in a live data matching step.
- 7.5. It is important to note that even if an ERO was unable to test local data in the Canvass Reform Data Test, they can still test local data within any canvass from 2020 onwards, relying only on national data for the first reformed canvass. As such, there is no need to go live with untested local data.
- 7.6. Parts I and II of the Canvass Reform Data Test Guidance were issued alongside the Interim Statement of Policy in March 2019. The Canvass Reform Data Test Guidance set out the preparatory action that EROs must complete before the test (Part I) as well as action required to collect and utilise local data should they choose to do so (Part II).