

# **Promoting Electoral Engagement**

**A Scrutiny Task Group Report**

**November 2014**

## 1.0 Introduction

- 1.1 Individual Electoral Registration (IER) has been described as the most significant change to the electoral system in the last 100 years. The IER system went live in July 2014 and is expected to fully supplant the current Household Electoral Registration system on 01 December 2015 with the aim of making the process of registration more convenient and secure. IER is different from the current system in that it requires each person to register individually, instead of one person in a household supplying the details of everyone living at that address. Online registration will be available from the start of IER and it is hoped this will help everyone who is eligible to vote to have control over their process of registration.
- 1.2 Following IER's introduction through the Electoral Registration and Administration Act 2013, the Electoral Commission, working with local authorities and their Electoral Registration Officers (EROs), has set a timetable for local strategies to be developed to incorporate the changes and rollout of IER in July 2014, the Act came into force with the first revised register being published on 01 December 2014. In the intervening period a data matching exercise known as the confirmation 'dry run' was undertaken to confirm existing local electoral registers with addresses taken from a database at the Department for Work and Pensions (DWP) to accurately match individuals to their addresses. A Red, Amber, Green (RAG) rating system was assigned to each individual on local registers to illustrate the extent to which they matched. Red indicated no-one at the property was successfully matched; Amber indicated discrepancies at the property e.g. someone who goes by a shortened or nickname; Green indicates a full match.
- 1.3 Following the confirmation dry run local authority EROs have been asked by the Electoral Commission to complete further matching exercises with their own local databases such as their Council Tax databases to further improve the quality of matching.
- 1.4 All electors who are successfully matched will be automatically included in the new electoral register which is published on 1 December 2014, written confirmation of registration will be sent to those electors who are successfully registered.
- 1.5 The Council has sent out a household inquiry form, which is in effect the equivalent of the traditional canvass form to properties where the confirmation dry run has suggested there may be residents who are not eligible to vote and/or not currently registered. Following the return of the form an invitation to register must be sent out to each eligible person requesting their date-of-birth and national insurance number.
- 1.6 Two reminders will be sent and followed up by household visits if necessary. It remains a civil offence not to return the forms and Electoral Registration Officers (EROs) can impose a civil penalty of £80 for not doing so. The first revised electoral register will then be published on 01 December 2014, after which there will be a follow-up canvass of those who initially failed to register.
- 1.7 Following this, an order will be laid before Parliament in August 2015 to conclude the transition to IER in December 2015. However, if no order is laid by Parliament, transition could extend to 2016. The full IER register is expected to be published on 01 December 2015; at this point those who have not provided the correct documentation will be removed from the electoral roll.
- 1.8 The risk of under-representation due to the shift to IER remains considerable, particularly when there is already a high level of under-registration in the UK as a whole. As of July 2014, the Electoral Commission estimated the figure to be as high as 7.5 million voters, some 15% of people eligible to vote.

## **2.0 Purpose of the task group**

- 2.1 So far, the London Borough of Brent is the only local authority to undertake scrutiny work on Individual Electoral Registration. The purpose of the scrutiny committee is to help the Council optimise the transition to IER by reviewing the strategy and consulting with relevant stakeholders.
- 2.2 The purpose of this particular task group is to ensure that all of Brent's residents are successfully transferred onto the new electoral roll. The task group's intended outcomes are:
- To ensure that a clear and coherent strategy for promoting electoral engagement in the borough, with a particular focus on under-represented groups is developed;
  - Ensure that the Council and elected members are engaging with local communities around civic participation and voter registration
  - Harness the expertise of local CVS organisations to reach out to residents;
  - Ensure that most people in the borough are successfully transferred to the new system with a target rate of 95%; and
  - If possible, increase the number of local people on the electoral register.
- 2.3 This particular issue is important for Brent as there are certain groups that have been identified as being at risk of not being transferred onto the new electoral roll, these include:
- Young people turning 18;
  - Those aged 18 – 24 (including students);
  - Tenants in the private rented sector (PRS);
  - Postal voters (see appendix A);
  - People whose first language is not English; and
  - People with learning disabilities.
- 2.4 Therefore, a comprehensive and successful rollout of IER must ensure that these groups are successfully registered. Ensuring that our residents can participate civically is a core objective of the borough plan, for this reason it is essential that our residents are transferred onto the new electoral roll successfully. The transition to IER also raises issues of equality and diversity. The Council must ensure it is fulfilling its public sector equality duties and this extends to civic participation and voter registration.

## **3.0 Task group membership**

- Cllr Neil Nerva (chair)
- Cllr Tom Miller
- Cllr Janice Long
- Cllr Tayo Oladapo
- Cllr Arshad Mahmood
- Cllr Rita Conneely
- Cllr Aisha Hoda-Benn

Policy support has been provided by James Curtis (Policy Officer) and Christopher Young (Senior Policy Officer)

In order to complete the work, the task group gathered evidence from a number of internal and external sources. We would like to thank:

### Internal

- James Diamond (Communications)
- Sean O'Sullivan (Electoral Services - ERO)
- Peter Goss (Electoral Services)
- John Birkett (Research and Intelligence)
- Jo McCormick (Partnerships and Participation)
- Freda Owusu (Brent Housing Partnership)
- Tony Hirsch (Policy and Performance)
- Carl Holloway (Media Relations)
- Councillor Michael Pavey (Deputy leader of the Council)
- Thomas Cattermole (Member Services)
- Nicola Mclean (Brent Youth Services)

### External

- The Electoral Commission
- Francis Henry (Daniels Estate Agents)
- Ann O'Neil (Brent Mencap)
- Lesley Spencer (Manchester City Council)
- Elisabeth Pop (Hope not Hate)
- Manpreet Singh (Hope not Hate)
- Chris Ruane MP (Political and Constitutional Reform Committee)

## 4.0 Methodology

The task group drew on a range of quantitative and qualitative data for this project which can be broadly grouped into four categories:

**Quantitative:** drawn from the DWP and collated by Brent's Research and Intelligence team. Data has also been obtained from the credit referencing agency Experian and the Office for National Statistics;

**Qualitative – evidence given:** consisting of face-to-face evidence and presentations given by relevant experts and stakeholders to the task group;

**Qualitative – consultation:** consisting of telephone and face-to-face consultation with relevant organisations such as the Electoral Commission; and

**Qualitative – secondary research:** consisting of the desktop-based collation of existing pieces of policy literature on the subject and examples of best practice from elsewhere.

## 5.0 Key Findings

- IER went live in July 2014 with the intention of making the process of registration more convenient and secure;
- Key features of IER include:

- The traditional method of registration carried out annually by the completion of a form by the whole household will cease. Annual registration forms will still be sent out to households and new residents identified on returned forms will be required to make a separate individual application;
- All applicants will have to supply two personal identifiers, usually their date of birth and national insurance number (see appendix C);
- To confirm elector's residence, greater use will be made of government and local authority databases namely the Department for Work and Pensions (DWP) Customer Information System (CIS) local authority electoral register data and Ordnance Survey AddressBase data; The three databases have been cross-referenced to establish a person's identity; their address and details on the electoral register. This is known as the confirmation 'dry run' and had been undertaken by the DWP; and
- The need for handwritten signatures has been removed, thus allowing applicants to register online using an electronic signature. Electoral Services produced an IER rollout and engagement strategy in the Spring of 2014, the communications team are in the process of developing a strategy which will be informed by the new register to be published in December 2014;
- Electoral services currently employ five full-time members of staff and two temporary fixed-term staff. Based on benchmarking done by the department across 15 London boroughs and the City of London Corporation, the Electoral Services capacity in Brent is considerably smaller when compared with the other boroughs. Brent currently has a ratio of 00.32 members of Electoral Services staff relative to the size of the electorate, compared with an average of 00.69 across the other boroughs surveyed.
- Nationally, the matching exercise revealed 79% of Green matches, 3% Amber and 18% Red. Overall 67.6% of the electors in Brent were successfully matched, just under the London average of 68%;
- The highest matching wards in Brent are:
  - Kenton (79%);
  - Queensbury (76%);
  - Welsh Harp and Dollis Hill (74%); and
  - Fryent and Stonebridge (73%).
- The lowest matching wards in Brent are:
  - Willesden Green and Mapesbury (56%);
  - Kilburn (58%); and
  - Kensal Green and Brondesbury Park (61%).
- The lowest matching wards all share a number of demographic characteristics:
  - Higher than Brent-average levels of deprivation;
  - Significant Black and Minority Ethnic (BME) communities;
  - Significant Muslim communities;
  - High number of single person households; and
  - High numbers of people in the PRS.
  - There are large numbers of people with disabilities, including learning difficulties, in the borough who may need additional support to successfully register;
- There is a need for greater engagement with vulnerable residents and their representative groups (CVS organisations);
- Similarly, there is a need to improve engagement on civic participation in the borough, particularly amongst Brent's young people and minority ethnic groups;
- Large numbers of Brent's residents speak English only as a second language;

- The registration form is not as clear as it could be and important information is missing;
- There are a number of internal and external partners within the housing sector and higher education that are ideally placed to feed into the strategy and to help with voter registration;
- Thirty-two per cent of Brent's residents are now living in the private rented sector which is characterised by short-term tenancies and therefore are at an increased risk of not registering; and
- There are a number of negative consequences of being removed from the electoral register besides not being able to vote, of which residents need to be aware.

## **6.0 Key Recommendations**

The task group makes the following key recommendations which can be broadly grouped into two categories – internal and external – although some may be interconnected.

### **Internal**

- Develop a clear and effective communications strategy to engage with the hardest-to-reach groups in the borough and ensure the right messages are conveyed. An effective communications strategy would utilise broadcast messaging, clear instructions and languages other than English on the registration form and use social media;
- Inform Brent's residents about the additional, potentially negative, consequences of being removed from the electoral register;
- Encourage new migrants to the borough to sign-up to IER via a welcome pack and consider integrating registration into citizenship ceremonies. This may be integrated into the new online portal being developed;
- Instructions on the registration form should be conveyed in short and clear sentences and information about how to apply without an NI number should be included;
- Clear guidelines should be developed to inform carers of their civic duties regarding those under their care; and
- The role of elected members could be more clearly set out to assist with voter registration.

### **External**

- Make full use of any role that Brent CVS organisations can play, specifically around issues of outreach and highlighting barriers to trust and sharing experiences of civic participation projects;
- Work closely with housing providers and stakeholders in the borough such as BHP, Registered housing providers and private sector estate agents to ensure that new tenants are signed-up to IER;
- Integrate IER sign-up into university enrolment based on a model currently being used by Manchester City Council as a way of boosting levels of student registration;
- Work closely with Brent Youth Parliament and other youth organisations such as 'Bite the Ballot' to make full use of their services to boost sign-up amongst young people in the borough; and

- There are a number of upcoming Government and Council programmes that could generate useful information for the strategy such as landlord licencing in Brent and the Government's imminent 'right to rent' scheme. Such developments ought to be monitored for any impact on voter registration; and
- Consider the possibility of lobbying Parliament to introduce legislation similar to the US National Voter Registration Act which makes provisions for public bodies and other statutory services to register citizens to vote when they come into contact with them.

## **7.0 Background and Policy Context**

7.1 IER was initially developed by the last Labour government and was scheduled to be implemented in 2015. Since the Coalition government took office in 2010, it has brought forward through the Electoral Registration and Administration Act 2013 to be introduced in 2014. The transition to IER began in England and Wales in June 2014 and is expected to fully replace the Household Electoral Registration system in 2015.

7.2 All electors who are successfully matched will be automatically included in the new electoral register which is published on 1 December 2014, written confirmation of registration will be sent to those electors who are successfully registered.

7.3 Since the completion of the confirmation dry run, Brent's Electoral Services team has sent out a household inquiry form, which is in effect the equivalent of the traditional canvass form to properties where the confirmation dry run has suggested there may be residents who are not eligible to vote and/or not currently registered. Following the return of the form an invitation to register would have also been sent out to each eligible person requesting their date-of-birth and national insurance number. If the invitation is not returned, up to two reminder letters may be sent and followed up by household visits, if necessary. It remains a civil offence not to return the forms and Electoral Registration Officers (EROs) can impose a civil penalty of £80 for not doing so.

7.4 The risk of under-representation due to the shift to IER remains considerable, particularly when there is already an unacceptably high level of under-registration in the UK as a whole, as of July 2014 the Electoral Commission estimated the figure to be as high as 7.5 million voters, some 15% of people eligible to vote.

7.5 As well as the confirmation dry run, the Electoral Commission also mandated that local authorities cross-reference DWP data with Council Tax databases. Brent was one of the local authorities which the Electoral Commission reported as having not done this however, having consulted with Electoral Services, this was not undertaken due to IT problems and the Commission was subsequently informed.

## **8.0 Emerging Themes from Evidence Taken by the Task Group**

8.1 Throughout the course of the task group's work four recurrent themes emerged from which the task group's recommendations have been drawn – the four themes are as follows:

- The need for enhanced civic engagement with the community e.g. improved civic education and greater outreach by elected members;
- The need for a communications strategy characterised by intelligence-led targeting of at-risk groups and clear and effective messaging; and
- The need for more effective use of partners including housing and other non-statutory partners.

## 8.2 ***Increased engagement through the Community and Voluntary Sector (CVS)***

Brent CVS organisations are often very successful at reaching some of the borough's hardest-to-reach groups and can frequently bring unique benefits to some of our communities. For this reason, they are ideally placed to feed in to the IER strategy. Officers in Partnerships and Participation suggested that Brent CVS organisations could play a threefold role:

**1. *Reach those least likely to register:*** This element of the strategy would centre on engaging particular groups of residents through targeted and group-specific outreach. It is also hoped that engagement through Brent CVS will help to engender trust as independent bodies amongst marginalised groups in the borough. In this capacity, CVS organisations will be able to represent particular communities allowing them to interface better with the Council.

Given that CVS organisations are embedded in particular communities, they are ideally placed to work with the Council to focus and deliver services for the strategy in particular neighbourhoods and utilise existing networks of funded projects or places.

**2. *Highlight barriers to trust:*** In this capacity, Brent CVS organisations can feed into the strategy by advising where resident issues are not resolved and where barriers to trust between the Council and Brent's residents exist. In this capacity, Brent CVS organisations are also well placed to lobby the Council and central government on issues and gaps in provision. More generally they are likely to reach communities that are less likely to engage.

**3. *Share experiences of civic participation projects:*** Local CVS organisations such as Brent Mencap can use their local knowledge and expertise to feed-in relevant information to the IER strategy. Local democracy events may also provide an ideal opportunity for such experiences and expertise to be fed into the strategy.

**8.3 As such, the task group recommends that the Council work closely with CVS organisations to take full advantage of this threefold role that the sector can play, both in terms of delivering registration services and in providing information to the Council about the outreach strategy.**

**8.4 The Partnerships and Engagement team can play a key role interfacing with Brent CVS organisations across the following:**

- Neighbourhood and community intelligence networks;
- Alternative models of engagement and successful projects;
- Voluntary sector intelligence and networks;
- Opportunities to work with funded organisations; and
- Knowledge from funding projects and co-producing services.

**8.5 It was also suggested by Tessa Awe of Brent CVS that there may be scope for co-production of the strategy with representatives from Brent CVS organisations. A full list of suggested CVS organisations is included as appendix B to this report and spans three key themes: organisations for refugees; Private Rented Sector (PRS) organisations and organisations for residents with a disability. The task group further recommends that the Council make full use of the above opportunities.**



8.6 Residents with disabilities are also identified as at risk of not registering. Ann O’Neil the Chief Executive of Brent Mencap told the task group:

“Thirty-three per cent of people with a learning disability in the borough are not registered to vote. Two to three percent of Brent’s population of 312,000 people have learning difficulties – this is a substantial number of people not on the electoral register.”

There are two primary reasons for this; the first is that many people with learning disabilities incorrectly believe that they don’t have the legal right to vote. The second is the way in which political parties communicate – using complex jargon can make it difficult for residents with learning difficulties to engage and understand the issues. In addition to this, one in five people in England have low literacy levels and may also find it hard to engage for similar reasons.

8.7 As such, the task group makes three recommendations to counteract such difficulties. Including that:

- **Instructions on the registration form would have to be conveyed in short, snappy sentences in a similar fashion as to how we would target the form to people for whom English isn’t their first language;**
- **The Council develops clear guidelines to inform carers of their civic duties regarding those under their care and ensure that they are aware that those under their care have the same voting rights as everyone else; and**
- **Ensure that polling stations are fully accessible to disabled residents and that staff are appropriately trained.**

8.8 Regarding the second recommendation above, the guidelines must also inform carers that people in both residential and domiciliary care often:

- **Need someone else to help them interpret and understand any written information. This could include letters, leaflets, flyers, or surveys posted through their doors;**
- **Need support to fill in any forms, or other requests for information. This could be registering to vote, or filling in a ballot paper;**
- **Need support to access and find out about information that is of interest to them. This could be finding out what a political party thinks about a key issue, or what different candidates in an election are saying; and**
- **Need support to understand the democratic process and to engage in it. This could be contacting their political representatives about something that is important to them.**

8.9 Carers must ensure that they are providing the right support to help those under their care overcome these barriers to civic participation, of which ensuring they sign-up to and understand IER is central.

8.10 Although the task group recommends that the above suggestions are factored into the strategy, a high number (79.8%) of residents in A1 social care are on the electoral roll based on the DWP matching data.

Ann O’Neil also made the following suggestions:

- That the Council prepares an accessible short article and info sheet for inclusion in Brent newsletters which could also be distributed via social media;
- IER could be raised as an issue at Brent Connects forums in the near future;
- Newsletters could be sent by the Council to tenants and Residents groups, including the Multi-faith Forum and other partnership groups;
- Messages could be placed on Council Transport buses;
- All voluntary sector groups with grants or contracts could be mandated to prove they were registering clients and include it in their procurement gateway questions;
- Have members attend CVS Annual General Meetings and raise the issue of IER at them;
- Involve Clinical Commissioning Group partners and use their engagement events such as the next Health Partners Forum on 19<sup>th</sup> November; and
- Place leaflets at Health Centres and GPs and ask community nursing teams to hand them out to people who are housebound.

## **9.0 Enhanced civic engagement with the community**

### *Young People*

9.1 Young people (16-24) are one of the groups identified as being at risk. Brent youth services are currently working with an organisation called 'Bite the Ballot' that is aiming to boost registration. The Bite the Ballot Community Engagement Officer (CEO) programme was created in 2013 with the purpose of placing young and inspirational individuals in Councils and Local Authorities to engage, inform and register all young people in the area so that they can fully participate in civic life.

9.2 CEOs will engage with individuals and external partners to develop and run activities with the aim of encouraging and, ultimately, increasing young peoples' turnout at elections. Candidates to be CEOs are selected on the basis of their passion for change and desire to make a difference. Candidates will have to be embedded in their communities to take account of differing local characteristics. The CEO will undertake the following activities:

- Have weekly Google hangout meetings with other CEOs to update each other on local work and discuss wider objectives;
- Report and provide feedback on progress and activity on a weekly basis to the grassroots team;
- Represent the organisation and the council in their region and liaise with local contacts accordingly;
- Write a regional section for Bite the Ballot's monthly newsletter and occasional blogs about their work in their area;
- Visit schools, youth groups and student unions in the area to deliver sessions and encourage registration;
- Develop relationships with local educational establishments and community groups;
- Engage young people on a peer-to-peer basis;
- Assist the council with their youth outreach work; and
- Promote their work through Bite the Ballot's social media channels.

### 9.3 Working with the CEO, the council will:

- Have direct contact with Bite the Bullet's grassroots coordinator;
- Help to select the best candidate via a seat on the interview panel; and
- Work with Bite the Bullet and the CEO to deliver a work plan, targets and objectives for the CEO.

### 9.4 Nicola Mclean from Brent Youth Services told the task group that working with Bite the Ballot, Brent Youth services are planning to:

"Undertake decision/policy-making exercises with young people aimed at illustrating the trade-offs that are inherent in policymaking. We will also try to make it clear to Brent's young people that when they don't vote they do not have a voice – we will illustrate this by pointing out that the cuts to public spending have fallen disproportionately on young people precisely, because young people vote less."

### 9.5 Nicola Mclean also told the task group that young people involved in the Brent Youth Parliament could potentially engage in focus groups to inform the communications strategy. Consequently, the task group recommends that the Council work closely with Bite the Ballot and Brent youth services to engage with young people. Both in voter registration work as well as to help the communications team to develop an appropriate approach to reaching young people. **Therefore, the task group recommends that young people be actively involved in the development of communications materials aimed specifically at young people.**

#### *Hope not Hate*

### 9.6 Members of the Task Group met with representatives from the anti-racism advocacy group 'Hope not Hate' (HnH) to discuss voter registration which is part of HnH's national strategy particularly amongst disenfranchised groups. Elisabeth from HnH described how working with external partners such as trade unions and faith groups had led to a number of successes in the north of England and could, therefore, be replicated in London.

### 9.7 In addition to this, Elisabeth told the task group how HnH had worked closely with universities on the University of Manchester campus where they recently signed-up over 150 university students on a typical day of canvassing. She also described how HnH are planning to canvass with Westminster University (which has a hall of residence in Brent) in November.

### 9.8 Manpreet Singh from HnH, who has been involved in community engagement in Brent, told the task group:

"One of the problems I constantly encounter in Brent is disengagement on the frontline and this is a problem as it is people on the frontline who have the power. We need to kick-start a campaign focussing on civic engagement in Brent – informing and reminding people of the value of civic engagement."

### 9.9 **The task group fully endorses and recommends Ms Singh's suggestion to have campaign leaflets translated into other languages and including a QR code<sup>1</sup> on leaflets to direct people to the website.**

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<sup>1</sup> A code that can be read by any imaging device (e.g. a smartphone) which links to further information.

9.10 When asked by a member of the task group what three things she would like to see in Brent, Ms Singh suggested the following:

- Aspirations to be met through positive change in the community;
- More CVS organisations heading into communities to engage with them; and
- More community engagement by Council members.

9.11 **The task group further recommends that Brent council and elected members work closely with HnH to better engage with local CVS organisations and that elected members support electoral services to do this. As HnH are planning to canvass in the borough, it is also recommended that the Council scope out suitable canvassing locations such as Kilburn market or the London Designer Outlet shopping centre in Wembley.**

#### *Immigration*

9.12 New migrants are identified as one of the groups most at risk of not registering; as such the task group recommends that we encourage Commonwealth citizens to sign-up to IER by incorporating information and forms about IER into a welcome pack.

9.13 The task group also recommends that sign-up to IER be integrated into citizenship ceremonies for new citizens. Voter registration could form part of citizenship ceremonies as a key aspect of such ceremonies is promising to respect the rights and freedoms of the UK.

#### **10.0 *Develop a formal communications strategy characterised by clear and effective messaging***

10.1 An effective communications strategy must be at the heart of the IER roll-out programme. Moreover, it must also convey the appropriate messages about IER to the groups identified as at risk of not registering in the borough.

10.2 The Council needs to target the polling districts identified as either amber or red in the confirmation dry run. In giving evidence to the task group on potential tactics, the communications teams suggested that broadcast messaging in the form of texts and emails, within a given proximity of Red and Amber polling districts, could be an effective means of reaching certain groups such as young professionals and other target groups who might be otherwise missed.

10.3 Broadcast messaging differs from text messaging in that it does not require specific phone numbers but can be sent to all mobile phones within a given area. The broadcast messaging service is always available, as the network is not used for other messages and only mobile phone operators can send messages. The US-based broadcast messaging service 'Nixle' which is widely used by a range of law enforcement agencies and municipal departments to inform citizens could serve as an example of best practice here. This kind of service could be used much more widely by the Council if it is successful.

10.4 A further problem encountered by the task group was how to canvass Brent's residents who reside in private, gated developments that are often difficult to access and frequently have strict security rules about who can enter. Broadcast messaging could help to reach residents in these kinds of properties. It could also help to inform people in the PRS who may still be registered at a previous address.

10.5 Communications officers also suggested utilising social media marketing to target residents in this kind of housing as well as young people (18-24) who are often more technologically aware than our older residents.

10.6 **Given the potential for the use of proximity and broadcast messaging, the task group recommends that any communications strategy consider these potentially powerful tactics as well as social media platforms to reach out to target groups.**

10.7 Another issue to take into account is that disillusionment with electoral politics is high; consequently, people may not register because they have no desire to vote. However, there are a number of other consequences of not being on the register. According to both the Electoral Commission and Experian<sup>2</sup>, the primary consequence of being removed from the register is that it can make it difficult to undergo a credit check and, in turn, significantly impede an individual's ability to access financial services including the following:

- Bank accounts (both current and savings);
- Mortgages;
- Mainstream consumer credit;
- Utility contracts (gas, electricity etc.);
- Mobile phone and internet contracts;
- Insurance;
- Access certain public services such as obtaining a passport;
- Apply for certain jobs, particularly in financial services; and
- Rent a property (a credit check is sometimes required in the referencing stage).

**Therefore, the task group recommends that any communications strategy makes these additional consequences of not being registered clear to encourage registration.**

#### *Registration Form*

10.8 Upon examining the registration form that the Council is sending out to residents, members decided that some elements of the form could be more straightforward. In particular, members believed that it was not immediately obvious that the form still has to be returned even if there is no-one in the household that is eligible to vote.

10.9 Therefore, the task group recommends that this is made clearer and that headings are kept bold, snappy and straightforward to better communicate with residents.

10.10 Brent is an incredibly diverse borough that has historically been a first point of arrival for new migrants. There are potentially large numbers of people in the borough for whom English is not their first language. As of the 2011 census<sup>3</sup>, the main languages spoken in Brent are:

- Gujarati 7.9%;
- Polish 3.4%; and
- Arabic 2.7%.

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<sup>2</sup> Experian, "Credit Report Basics"

<sup>3</sup> Nomis, Local Authority Statistics, Main language by measures

- 10.11 The task group recommends that key headings on the registration form are also written in these languages to ensure that it can be clearly understood by residents for whom English is not their first language.
- 10.12 A further issue raised by the task group was that it is not immediately clear on the registration form that identifiers such as a driving licence and passport can be used to register as well as an NI number. This has implications for Brent as there are certain groups, such as Muslim women and Irish men, among whom large numbers do not have an NI number.
- 10.13 Therefore, the task group recommends that it is made clear on the form that unique identifiers other than an NI number can be used to register (see appendix C for further information); details about unique identifiers should also be placed on the website. In addition to this, it is recommended that the Council places a link on the website directing people to the Jobcentre Plus website where they can obtain a NI number if they do not have one.

#### **11.0 *More effective use of partners including housing and other non-statutory use of partners***

##### *'Housing'*

- 11.1 Officers from Housing met with the task group to discuss the changing nature of Brent's housing need and what impact that might have on voter registration, as well as the potential to improve registration through landlord licensing in the PRS.
- 11.2 Given the demographic trends associated with not signing up to IER, the task group has identified a number of partners in the borough who may be ideally placed to feed into the IER roll-out programme. As the electoral register ties people to a specific address, any effective IER strategy must take into account Brent's housing context. There are a number of housing factors in the borough that present challenges for the roll-out of IER:
- High levels of population turnover means people are often registered at the wrong address; and
  - Large numbers of people in Houses of Multiple Occupation (HMOs) which often have short leases and short-term residents. There is also the potential for overcrowding and sub-letting and there could be properties where people are in the UK illegally or have overstayed their visa.

##### *Landlord Licensing*

- 11.3 The PRS has grown significantly in the last decade, with 32% of residents now in the PRS. This is primarily concentrated in the south of the borough but is increasing in the north. In order to cope with this increase in the PRS, licensing is being introduced from January 2015 which is mandatory for larger HMOs, some smaller HMOs and all PRS properties in Wembley Central, Harlesden and Willesden Green. Landlord licensing presents a number of opportunities for improving voter registration, including:
- A more complete and up-to-date record of PRS housing;
  - Coverage of high-risk properties;

- Better knowledge of, and contact with landlords;
  - Better informed landlords and the ability to work with them to encourage registration; and
  - Encouragement of longer-term tenancies, improved conditions and greater market stability.
- 11.4 The task group recommends that full advantage is taken of the opportunities presented by landlord licensing and that the information gleaned from licensing is fed directly into the IER strategy.

#### *'Right to Rent'*

- 11.5 Members of the task group also suggested that the Government's 'right to rent' scheme may present opportunities for the Council to gain information about tenants and subsequently enable a smoother transition to IER.
- 11.6 Right to Rent was introduced in September 2014 following the passage of the Immigration Act and is to be piloted in the West Midlands as part of a phased introduction across the country. The law is intended to stop illegal migrants using public services to which they are not legally entitled. It is also hoped that it will make it easier for the Home Office to remove people who are in the country illegally.
- 11.7 Following the Act's introduction, private landlords will have to check the right of prospective tenants to be in the country, failure to do this could lead to landlords being fined up to £3,000. Evidence of a person's identity and citizenship such as a passport or biometric data will have to be sought – this is already common practice for most private landlords and estate agents, so consequently enforcement should not be too much of an issue.
- 11.8 By legally requiring that landlords obtain evidence of identity and citizenship prior to letting to new tenants, we should be able to build up a clearer picture of two of the groups most at risk of not signing up to IER and where they are concentrated, these are:
- New migrants; and
  - People in the PRS
- 11.9 A clearer picture of these two groups could subsequently inform a more accurate and targeted IER strategy. Therefore the task group recommends that the Council monitor the developments around right to rent for any impact it might have on voter registration and communication with residents.

#### *Estate Agents and Private Landlords*

- 11.10 Francis Henry, from Daniels Estates who have several branches in Brent, was asked to give evidence to the task group on the potential role that private landlords and estate agents could play in informing residents about IER. He told the task group that:

"Council tax forms are one of the first things we ask new tenants to complete if they have not yet done so. We have a checklist of things to do, but electoral registration is not on it. We could build IER into a welcome email that we send out to new tenants. I

think many estate agents would be happy to do this as it would make both them and the landlord look professional. Email is the cheapest way of doing this.”

- 11.11 Therefore, the task group recommends examining the possibility of working with estate agents in Brent to incorporate IER registration into their welcome packs alongside council tax forms and utility company registration forms etc.

Francis Henry also raised a few issues that might occur once this process commences:

“Overcrowding and agency fees mean that people are more likely to give false information on their tenancy agreements as fewer tenants mean fewer fees payable to estate agents.”

- 11.12 **As such, the task group recommends that the Council work with private landlords and estate agents to encourage them to keep a closer eye on the number of people in their properties and subsequently make this information available to the Council.** As each tenant pays a certain amount in agency fees, estate agents could be incentivised to do this by the prospect of a greater sum fees – as residents whom they were not aware of would not be paying fees.

- 11.13 To provide further incentive for private landlords to do this, it may be an idea to remind them that from an immigration perspective, landlords are responsible for who occupies their property even if they are not signed up to the tenancy agreement i.e. a ‘sub-let.’

- 11.14 In addition to this, encouraging private landlords to register their tenants could be further incentivised by highlighting the dangers of identity theft to private landlords who do not register their tenants.

- 11.15 There is also the question of whether estate agents are renting or officially managing the property. Francis Henry told the task group that if an estate agent is collecting the rent then they are effectively managing the property, but this may cause confusion as to who is checking to see if tenants are on the electoral register. Consequently, the task group recommends that clear guidelines are developed around this issue.

#### *Brent Housing Partnership (BHP)*

- 11.16 BHP, Brent Council’s Arms Length Management Organisation, manages the 13,600 council properties in Brent; BHP has a direct role in encouraging residents to live independently whilst providing a range of services such as repairs, collecting rent and managing disputes between neighbours. Therefore, they are ideally placed to inform their residents about the changes to IER. Freda Owusu from BHP gave evidence to the task group and suggested the following possibilities:

- Include IER registration forms in the welcome pack sent out to all new BHP tenants welcoming them to their property. To do this BHP require a number of registration forms from Electoral Services;
- BHP publish a quarterly magazine in which they could place an advert informing their residents about the changes to voter registration;
- BHP run resident talkback sessions as well as other consultation forums where they could raise the issue;



- BHP hold resident communication group meetings where they help clients to engage civically – this could also be an ideal forum for raising the issue; and
- A recent restructuring of the customer response team has opened up the opportunity to engage residents over the phone which we could potentially examine.

11.17 **The task group recommends that the above suggestions are adopted. At the same time it is recommended that clear guidelines for canvassing BHP properties are developed, the names and numbers of tenancy officers obtained and confirmation letters provided to canvassers by BHP.** BHP have said that they are happy to allow canvassing in their properties provided security guidelines are adhered to.

#### *Universities and Colleges*

- 11.18 Given that young people and people in short-term accommodation are two of the groups identified as being at risk of not registering, it has been suggested that high number of students will be too.
- 11.19 Manchester City Council (MCC) has worked with both the University of Manchester (UoM) and Manchester Metropolitan University (MMU) in order to make sign-up to IER part of their enrolment process.
- 11.20 This system works well, as many of the same questions required for university enrolment are similar to the questions required for sign-up to IER. Whilst this has been fully integrated into the enrolment process, it is not compulsory and, as such, students can opt out if they wish.
- 11.21 A major caveat is that IER as part of university enrolment is far easier to do if the university has an internal enrolment system. If the university has an external enrolment system this cannot be done without the possibility of incurring significant costs. For this reason, MCC has had far more success in working with MMU than UoM as the former has an internal enrolment process but the latter an external one.
- 11.22 MCC has covered the costs incurred by universities, as it was established that it would be more cost effective to do this than alternative methods of student enrolment to IER. MCC is also engaged in a large communications campaign throughout Manchester universities utilising leaflets and other forms of communications to inform people about the transition to IER.
- 11.23 **Therefore, the task group recommends scoping out whether or not universities and other institutions with high numbers of students such as the college of North-West London have in-house enrolment processes. If so, a model of IER registration could be integrated into enrolment processes in borough based on the Manchester model.**

#### *Other Public Services*

- 11.24 A wider question raised by the task group was the role that public bodies can play in registering people with whom they come into contact.
- 11.25 In the United States the National Voter Registration Act (NVRA) 1993 serves as the framework for individual US states' registration laws. The aim of the Act is to increase registration and turnout in US elections. The NVRA does this by mandating that other

public bodies register people who are unregistered whenever they come into contact with them.

- 11.26 The most common public body to provide registration services under the NVRA in the US is the state-level motor vehicle registration and licensing agencies – as such, NVRA came to be known as the ‘motor-voter’ law and some 37.1% of registrations in the US now come from this. In addition to motor vehicle departments, welfare services such as food stamp providers also provide electoral registration services. Following the law’s introduction, turnout at elections in Colorado was boosted by 4.7% in the subsequent four years.<sup>4</sup>
- 11.27 Legislation similar to ‘motor-voter’ in the borough could allow for Brent’s residents to be prompted to register when they come into contact with Council services, particularly those hard-to-reach groups. This could be extended to encourage 16 year olds to register at school.
- 11.28 Labour have said they will implement a similar system if they win power at the next general election.<sup>5</sup> Chris Ruane MP, who sits on the cross-party Political and Constitutional Reform Committee, told the task group that:

“This could serve the dual purpose of not only registering people, but also building a better demographic profile of those not registered with the potential for developing a single cross-service database.”

- 11.29 In a similar capacity it was also suggested that Brent Customer Services could register residents and gather information about them to feed into a single database. **The task group recommends that Brent Council effectively lobby Parliament to introduce legislation similar to the NVRA.**

### *Electoral Services*

- 11.30 Chris Ruane MP told the task group that the ERO in his local council of Denbighshire, which has made considerable progress in registering large number of previously unregistered eligible voters. In consultation with Sean O’Sullivan, the ERO for Denbighshire, Gareth Evans explained how his department had been so successful. In addition to doorstep canvassing, Denbighshire Council used data sources from within the Council and search for additional data to target potential electors. These include the following:
- **Council Tax and Housing Benefit data:** The Council receives a weekly data file from the Revenues Department detailing all home movers and new benefit claimants. Using this data has removed the need to work with third sector providers as well as social and private landlords, who have a duty to inform of a change in tenancies to the council tax department. This allows for Denbighshire Council to build up a more accurate picture of their residents in the PRS.
  - **Education Records:** The Council receives a data file from the education department of all 16/17 year olds still in education which are then added to the

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<sup>4</sup> The Electoral Reform Society (09/12/13) “Electoral Registration – Order and Regulations briefing”, House of Lords Grand Committee

<sup>5</sup> Mason, Rowena (20/02/14) “Labour is considering allowing voters to register on election day”, *The Guardian*

register as pending electors for a registration form to be sent at the age of 18. This allows the Council to ensure that increased numbers of young people are registered; and

- **Adult Social Care:** The Council has used records held by the Financial Assessment Team in Social Services to assist with the verification of electors in social care residences if the care is paid for by the local authority. The Council receives quarterly lists from the owners of residential social care properties to ensure that they are effectively registering people in residential social care.

**11.31 The task group recommends that the above methods are considered by Electoral Services as a means of working more closely with other departments to improve ongoing voter registration.**

#### **Appendix A – Postal voters not successfully matched**

During the task group, members requested a breakdown of postal voters across Brent who were not successfully matched during the confirmation dry run. A total of 2739 postal voters were not successfully matched in Brent with the lowest matching wards being Dollis Hill where 71 postal voters were not successfully matched and Queens Park where 55 were not successfully matched.

The top five polling districts in Brent where postal voters were not successfully matched are:

1. Dollis Hill (71)
2. Queens Park (55)
3. Mapesbury (52)
4. Welsh Harp (51)
5. Brondesbury Park (50)

#### **Appendix B – Relevant CVS Organisations**

<b>Organisations for refugees</b>	<b>Private sector rented (PRS) organisations</b>	<b>Organisations for residents with a disability</b>
<ul style="list-style-type: none"> <li>• Brent Refugees and Migrants Forum</li> <li>• Refugees in Effective and Active Partnership (REAP)</li> <li>• Migrant Refugee Service</li> <li>• Salusbury World Refugee Centre</li> <li>• West London Refugee Women's Forum</li> <li>• African Cultural Association</li> <li>• African Women's Care</li> <li>• Albanian Union Mother Teresa</li> <li>• Bosnia and Herzegovina Community Advice Centre</li> <li>• Diaspora UK</li> <li>• Education Skills and Development Group</li> </ul>	<ul style="list-style-type: none"> <li>• Advice4Renters</li> </ul>	<ul style="list-style-type: none"> <li>• Da Stage Performing Arts &amp; Childcare Club</li> <li>• Action For Kids</li> <li>• Alice Hoffman Homes Ltd</li> <li>• Asian People's Disability Alliance</li> <li>• Association Of Muslims With Disabilities (UK)</li> <li>• Black Disabled Peoples Association</li> <li>• Brent Advocacy Concerns</li> <li>• Brent African-Caribbean Disabled People's Association</li> <li>• Brent Association Of Disabled People</li> <li>• Brent Branch Multiple</li> </ul>

Organisations for refugees	Private rented sector (PRS) organisations	Organisations for residents with a disability
<ul style="list-style-type: none"> <li>• Foundation For Women's Health and Social Care Research And Development</li> <li>• Help Somalia Foundation</li> <li>• Hornstars SC</li> <li>• Horumarnta Somali Health and Social Care Project</li> <li>• Iraqi Centre for Integration and Cohesion</li> <li>• Iraqi Welfare Association</li> <li>• Red Sea Community Programme</li> <li>• Tamil Association of Brent</li> <li>• Tamil Community Housing Association</li> <li>• West London YMCA</li> <li>• Camden Somali Cultural Centre</li> <li>• CSCE Consortium &amp; Somali Mental Health and Social Care Link Project</li> <li>• Dayah (The Somali Youth Development Programme)</li> <li>• Help Somalia Foundation</li> <li>• Horumarnta Somali Health and Social Care Project</li> <li>• North West London Somali Cup</li> <li>• Somali Advice and Forum of Information (SAAFI)</li> <li>• Somali British Families Centre Limited</li> <li>• Somali Carers Project</li> <li>• Somali Employment Rights (1116840)</li> <li>• Somali Health and Social Care &amp; Mental Link Project</li> <li>• Stonebridge Somali Centre</li> <li>• Community Health and Education Support Association (COHESA)</li> <li>• Jazari Community Centre</li> <li>• I Serve - Serving The Community</li> <li>• Education and Skills Development Group (ESDG)</li> <li>• Dayah (The Somali Youth Development Programme)</li> <li>• Brent Somali Community Roots</li> <li>• Somali Humanitarian Aid Ltd</li> </ul>		<ul style="list-style-type: none"> <li>• Sclerosis Society</li> <li>• Brent Irish Advisory Service</li> <li>• Brent Mencap</li> <li>• Carewatch (Ealing Office)</li> <li>• Cyclegreen Community Group</li> <li>• Cyron Housing Co-operative</li> <li>• Disabled Living Foundation</li> <li>• Diu Community</li> <li>• Enara Community Care</li> <li>• Food Chain (The)</li> <li>• Harrow Association of Disabled People</li> <li>• Home Library Service</li> <li>• Kensal Rise Senior Citizens Luncheon Club</li> <li>• Loud And Clear Mental Health and Social Care Advocacy</li> <li>• Mapesbury Dell Trust</li> <li>• Mapesbury Jewish Care</li> <li>• Middlesex Community Service</li> <li>• Music Complex</li> <li>• New Millenium Day Centre</li> <li>• Nu Start Community Enterprise</li> <li>• Oasis Care and Training Agency (OCTA)</li> <li>• Preston &amp; Mall Youth Community Centre</li> <li>• Royal Association for Deaf People</li> <li>• Royal London Society for the Blind</li> <li>• Stepping Out</li> <li>• Support for Living - My Choice</li> <li>• Support for Living - Supported Housing Brent</li> <li>• The Advocacy Project</li> <li>• The Disability Foundation</li> <li>• The Homecare Partnership</li> <li>• Black Disabled People's Association</li> </ul>

Organisations for refugees	Private rented (PRS) sector organisations	Organisations for residents with a disability
<ul style="list-style-type: none"> <li>• Somali Link &amp; Support Project</li> <li>• Somali Management Development Centre</li> <li>• Somali Youth Development</li> <li>• SOS Somalia</li> <li>• 4 Bees In Brent</li> </ul>		<ul style="list-style-type: none"> <li>• Black Women's Mental Health and Social Care Project</li> </ul>

### **Appendix C – Registration Requirements**

In order to register, an individual needs to provide the following documentation:

- NI number;
- Date of Birth; and
- Current address.

If an individual does not have an NI number then they can still register however, they will not be able to register online and will have to contact their local electoral registration office and provide other unique identifiers such as a passport or driving licence. We could potentially lobby central government to link NI numbers to work visas in order that an individual who obtains a work visa automatically obtains an NI number.

If an individual does not know their date-of-birth then they can provide an approximate age. If they do not have a fixed address they can still register using a temporary address by making a 'declaration of a local connection at a local electoral office.

<b><u>Primary</u></b>	<b><u>Alternative</u></b>
NI number	Unique identifier (passport or driving licence)
Date of Birth	An approximate age can be provided (under 18; 18-70 or over 70)
Current Address	'declaration of local connection' at local electoral office