



Promoting Electoral Engagement

A Scrutiny Task Group Report

November 2014

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Chair's Foreword



This task group was established in response to the challenges posed by the introduction of Individual Electoral Registration (IER), the most significant change in the electoral system for 100 years. The right to vote is fundamental to democracy and it is for this reason that Brent Council's new administration has made this issue a corporate priority.

Brent has always had a significant level of under-registration. However, the transition to IER presents an opportunity to better understand how significant the problem is, and more importantly, offer practical proposals as to how Brent, and our partners, can improve registration.

To ensure a successful transition to IER, the council must also change the way we work, the way we engage with partners and to engage more with community groups and residents. The council must champion voter registration, by making the case for civic participation. As we have subsequently found out, however, not being included on the electoral register could also mean being unable to undergo a credit reference check which can significantly impede an individual's ability to access financial services, including a mortgage or even a mobile phone contract.

Brent is an incredibly diverse borough; no two wards look alike. Through our investigations, we have discovered that even within neighbourhoods and polling districts, there is a large variance in voter registration. This means that we need to a bespoke plan to target those most at-risk of not registering and to concentrate efforts in the areas most in need and make best use of communications tactics that target those who are hardest to reach.

Consequently, a successful transition to IER is not something that the council can do on its own. It will require a huge joint effort across council services and local stakeholders, partner agencies and community organisations.

Unlike previous scrutiny task groups, the approach taken in this instance has shown that by working more collaboratively with service areas, issues and findings can be actioned much more quickly.

I would like to thank the numerous officers and councillors who sat on the task group and the many witnesses who kindly devoted their time to contribute to this report.

Cllr Neil Nerva

Chair, Individual Electoral Registration Scrutiny Task Group

November 2014

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 partners. We would like to thank the following colleagues from within Brent Council and our partners, who have provided invaluable insight throughout this process.

Brent Council:

- James Diamond (Communications)
- Sean O’Sullivan (Electoral Services - ERO)
- Peter Goss (Democratic Services)
- Dr John Birkett (Research and Intelligence)
- Jo McCormick (Partnerships and Participation)
- Tessa Awe (CVS Brent)
- Freda Owusu (Brent Housing Partnership)
- Tony Hirsch (Policy and Performance)
- Carl Holloway (Media Relations)
- Cllr Michael Pavey (Deputy Leader of the Council)
- Thomas Cattermole (Member Services)
- Nicola Mclean (Brent Youth Services)
- Dr Melanie Smith (Director of Public Health)
- Phillip Porter (Director of Adult Social Care)

External Partners:

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

Executive Summary

Individual Electoral Registration (IER) was introduced through the Electoral Registration and Administration Act 2013 and, from June 2014, all newly registered voters must be registered under the new system. IER requires each person to register individually rather than having one person in the household supply the details of everyone living at a particular address. In addition to a current address, it also requires two personal identifiers - further proof of identity and eligibility – in the form of a National Insurance (NI) number and a date of birth.

The introduction of IER, therefore, presents the council with significant challenges as well as a range of opportunities to improve voter registration across Brent, as uncovered by the task group's investigations. One of the more unique opportunities presented by the transition to IER is that, over the course of this process, a much clearer picture of under-registration may be developed and, in turn, targeted through an intelligence-led communications strategy.

This task group was established with the over-arching aim of ensuring that as many of Brent's residents are transferred to the new system as possible. Further outcomes include the following:

- To ensure that a clear and coherent IER roll-out programme and communications strategy is developed for promoting electoral engagement in the borough, with a particular focus on under-represented groups;
- Ensure that the council and elected members are engaging with local communities around civic participation and voter registration;
- Harness the expertise of local VCS organisations to reach out to residents;
- Ensure that the maximum people in the borough are successfully transferred to the new system with a target rate of 95%; and
- Increase the proportion of local people on the electoral register.

Prior to the first revised register being published on 1 December 2014, a confirmation 'dry-run' data-matching exercise, which cross-referenced data from the Department for Work and Pensions (DWP) with local electoral registers was undertaken to confirm electors' addresses. In Brent, 67.6% of electors were successfully matched; this is significantly below the national average of 79% but just below the London average of 68%.

A Red, Amber, Green (RAG) rating has been assigned to each individual to indicate the extent to which they have been successfully matched. Red indicates that no-one at the property has matched, Amber indicates discrepancies at the property (e.g. someone whose name has recently changed), whereas Green indicates a full match.

The matching exercise has allowed the council to identify what the lowest matching polling districts are. Consequently, the report recommends the Electoral Services team make a concerted effort to target the polling districts with the highest overall number of Amber and Red matches. Whilst the matching exercise has revealed the geography of under-registration, the demographics of under-registration have been more difficult to establish. Therefore, the report recommends that more work is required to establish the demographic trends of under-registration as these may have implications for the IER roll-out.

After considering evidence taken from key officers from Brent Council's services, voluntary and community sector organisations and other key stakeholders, this report advocates a threefold approach for improving voter registration as a whole and for targeting the lowest-matching polling districts:

1. The need for a comprehensive IER roll-out programme and communications strategy which is characterised by intelligence-led targeting of areas and at-risk community groups. The strategy should use clear and effective messaging;
2. The need for more effective work with partners including the voluntary and community sector, housing and other statutory and non-statutory partners; and
3. The need for enhanced civic engagement with the community (e.g. improved civic education and greater outreach by elected members).

The risk of under-representation due to the shift to IER remains considerable. In previous years Brent's Electoral Services team, through their registration drives and canvasses, have achieved registration rates of 95%. What the matching, therefore, tells us is that – even as snapshot – voter registration is not as accurate as we would like to think. Moreover, the Electoral Commission estimates that some 7.5 million eligible voters nationally will not be registered to vote in more is not done to promote electoral registration.

Recommendations

In light of the facts and findings highlighted in this report, the task group makes the following recommendations. These recommendations, which can be broadly grouped into three themes, include:

Theme 1: the need for a comprehensive IER roll-out programme and communications strategy

1. Carry out further work to establish key target groups so that bespoke tactics may be used to reach more eligible voters. This would include an assessment the audiences attitudes, opinions and motivations as well as any potential language barriers there may be;
2. When developing the IER roll-out programme, the lowest matched polling districts and wards should be primarily targeted during canvassing;
3. The Electoral Services team should work with all council departments and partners to adopt an 'every contact counts' approach to ensure contact with residents is maximised, including email footers, automated messaging and library card and blue badge applications;
4. Proximity and broadcast messaging and social media should be considered as part of the communications strategy;
5. The communications team should engage young people to be actively involved in the development of communications materials aimed specifically at young people;
6. The communications team should develop messages around the benefits of civic participation and why it is important to register as well as the negative consequences of not being listed on the register;
7. Leaflets and posters about IER should made clearer and the headings made bold, snappy and straightforward to better communicate with residents with learning difficulties and visual impairments. A QR code¹ could also be placed on leaflets to direct people to the website;
8. Postal communications with electors should include a covering letter that is straightforward and easy to understand;
9. It should be made clear in the council's covering letter that unique identifiers other than an National Insurance (NI) number can be used to, details about unique identifiers should also be placed on the website; and
10. Brent's website should have a link directing people to the Jobcentre Plus website where they can obtain a NI number if they do not have one.

Theme 2: the need for more effective working of partners including the voluntary and community sector, housing and other statutory and non-statutory partners

11. Electoral Services should engage Adult Social Care (ASC), Public Health and external partners such as the NHS and Brent Mencap to ensure that potentially vulnerable residents are successfully registered;
12. Electoral Services should work with ASC to develop clear guidelines to inform both residential and domiciliary carers of their civic duties regarding those under their care, they must also inform residents under their care about IER as part of the 'making every contact count' programme;

¹ A code that by read by any imaging device (e.g. a smartphone) which links to further information.

13. The council's Public Health function should encourage sign-up to IER through its commissioned services;
14. The council should ensure that polling stations are fully accessible to disabled residents and that staff are appropriately trained;
15. Full advantage is taken of the opportunities presented by landlord licensing and that the information gleaned from licensing is fed directly into the IER roll-out programme;
16. Clear guidelines for canvassing Brent Housing Partnership (BHP) properties must be developed, the names and numbers of tenancy officers obtained and confirmation letters provided to canvassers by BHP;
17. Canvassers should also include visits to specialty shops catering to residents from different backgrounds;
18. Commonwealth, EU and new citizens should be encouraged to sign-up to IER by incorporating information and forms about IER into a welcome pack;
19. The Electoral Services team work with GP practices, dentists, opticians and pharmacies to encourage voter registration;
20. Electoral Services and Housing should monitor the developments around 'right to rent' for any impact it might have on information gathering and communication with residents;
21. Electoral Services should scope the possibility of working with estate agents in Brent to incorporate IER registration into potential welcome packs alongside council tax forms and utility company registration forms;
22. Electoral Services should scope the capacity to work with The University of Westminster and other higher education institutions such as the College of North-West London to integrate into enrolment processes similar to a model used by Manchester City Council;
23. Brent Council should work with the Greater London Authority (GLA) to lobby Parliament to introduce legislation similar to the National Voter Registration Act (NVRA); and
24. Electoral Services should work with Brent Youth Services and Bite the Ballot to register young people.

Theme 3: the need for enhanced civic engagement with the community (e.g. improved civic education and greater outreach by elected members)

25. Electoral Services should work closely with Brent's Partnerships and Engagement team and CVS Brent to take full advantage of the VCS sector, both in terms of delivering registration services and in providing information to the council about outreach work in the community; and
26. The council and elected members work closely with Hope not Hate (HnH) to better engage with local VCS organisations and elected members should support Electoral Services to do this.

1.0 Introduction – the scope and purpose of the task group’s work

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 June 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 own registration. Another key difference is that registration will now become an annual process, meaning voters will have to re-register prior to each election.

The introduction of IER has highlighted the challenge of low levels of voter registration and civic engagement, both of which have been significant issues in Brent for a number of years and need addressing. Consequently, a number of issues raised in this document would be of relevance in spite of the introduction of IER. At this point, it is unclear how many eligible voters there are in Brent who, for a number of reasons, may not be registered to vote.

The purpose of this particular task group is to ensure that all of Brent’s residents are successfully transferred onto the new electoral roll. Therefore, the task group’s intended outcomes are:

- To ensure that a clear and coherent IER roll-out programme and communications strategy is developed for promoting electoral engagement in the borough, with a particular focus on under-represented groups;
- Ensure that the council and elected members are engaging with local communities around civic participation and voter registration;
- Harness the expertise of local VCS organisations to reach out to residents;
- Ensure that the maximum people in the borough are successfully transferred to the new system with a target rate of 95%; and
- Increase the proportion of local people on the electoral register.

After considering evidence taken from key officers from Brent Council’s services, voluntary and community sector organisations and other key stakeholders, this report advocates a threefold approach for improving voter registration as a whole and for targeting the lowest-matching polling districts:

1. The need for a comprehensive IER roll-out programme and communications strategy which is characterised by intelligence-led targeting of areas and at-risk community groups. The strategy should use clear and effective messaging;
2. The need for more effective work with partners including the voluntary and community sector, housing and other statutory and non-statutory partners; and
3. The need for enhanced civic engagement with the community (e.g. improved civic education and greater outreach by elected members).

So far, the London Borough of Brent is the only local authority that we are aware of to undertake scrutiny work on Individual Electoral Registration. The new administration in Brent has made scrutiny of electoral registration a corporate priority. The transition to IER also raises issues of equality and diversity, many of which are addressed within this report’s findings and recommendations. The council must ensure it is fulfilling its public sector equality duties and this extends to civic participation and voter registration.

2.0 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.

3.0 Background and Policy Context

Individual Electoral Registration (IER) was introduced through the Electoral Registration and Administration Act 2013 and from June 2014 all newly registered voters must be registered under the new system. IER requires each person to register individually rather than having one person in the household supply the details of everyone living at a particular address. It also requires further proof of identity and eligibility in the form of a National Insurance (NI) number, date of birth and current 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 own registration. Another key difference is that registration will now become an annual process, meaning voters will have to re-register prior to each election.

Low levels of voter registration and civic engagement have been significant issues in Brent for a number of years and, consequently, a number of issues raised in this document would be of relevance in spite of the introduction of IER. At this point, it is unclear how many eligible voters there are in Brent who, for a number of reasons, may not be registered to vote and the transition to IER underscores this more important, ongoing issue which needs addressing.

The Electoral Commission has mandated that local authorities - and their Electoral Registration Officers (EROs) - set a timetable for local strategies to be developed in order to transition to the new system. Prior to the first, revised, register being published on 1 December 2014 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). This was done 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 indicated a full match.

As well as the confirmation dry run, the Electoral Commission also requested that local authorities cross-reference DWP data with local records, such as 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.

All electors who have been successfully matched in this process will be automatically transferred to the new role and have been written to with confirmation of their status. For households that have been matched Red or Amber, the council has sent out a household inquiry form; this is, in effect, the equivalent of the traditional canvass form. Following the return of the household inquiry form, an invitation to register must be sent out to each eligible person requesting their date-of-birth and national insurance numbers.

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) may 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.

Following this, an order will be laid before Parliament in August 2015 to fully conclude the transition to IER when the full register is expected to be published on 01 December 2015. However, if no order is laid by Parliament, the transition period could extend to 2016. At this point those who have not provided the correct documentation will be removed from the electoral roll.

The risk of under-representation due to the transition 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.

In introducing IER a year earlier than scheduled, the government acknowledged that local authorities may be put under increased pressure to deliver the changes to implement the new system. The Cabinet Office, therefore, has made it clear that any activities which create additional costs will be met by top-up funding to support the transition to IER. As is the case elsewhere, there is some concern in Brent that the new system will lead to a long-term increase in work which will not be matched by government funding. The task group has been told that such additional funds have been made available through yearly ring-fenced Cabinet Office grants to support the transition to IER. So far, these include the following:

- £11,000 in August 2013; and
- £217,641 in 2014/15.

Although funding arrangements have not yet been disclosed for 2015/16, Brent's Electoral Services team are expecting a similar level of grant funding for further work.

4.0 Key Facts and Findings

- IER came into law in June 2014, from which point electors must register individually through the new system;
- Key features of IER include:
 - The traditional method of household registration will cease and all electors will be required to make an annual separate individual application;
 - All applicants will have to supply two personal identifiers, usually their date of birth and national insurance number (see Appendix A); and

- The need for handwritten signatures has been removed, thus allowing applicants to register online using an electronic signature.
- Brent's Electoral Services produced a Public Engagement Strategy in the Spring of 2014 (see Appendix B) and 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 3.5 full-time members of staff² and two temporary fixed-term staff. This number, however, is increased at key moments in the electoral cycle from within Democratic Services. Based on benchmarking done by the department across 15 London boroughs, 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;
- The electoral services team has a budget of £217,000 in 2014/14 from a Cabinet Office grant allocated for the transition to IER. Similar levels of funding are expected for 2015-16;
- There is a lack of clarity around e-registration and the potential for registration fraud and identity theft;
- Nationally, the matching exercise revealed 79% Green matches, 3% Amber and 18% Red.
- Overall 67.6% of electors in Brent were successfully matched, just under the London average of 68%;
- Brent is an incredibly diverse borough and no two wards are the same. Something which further highlights the need for a bespoke approach to engaging with key community groups and areas;
- There is a need for greater engagement with vulnerable residents and their representative groups (VCS organisations);
- Similarly, there is a need to increase 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 Electoral Commission's (statutory) 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 PRS which is characterised by short-term tenancies and, therefore, are at an increased risk of not registering;
- 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; and
- The committee is pleased to hear that Electoral Services are looking to recruit an additional staff member to assist in implementing IER.

5.0 Emerging themes from evidence taken by the task group

Given the scope of the reforms to electoral registration and likely impact of not preparing well for the transition to IER, the task group felt that it was important to take evidence from as wide a range of council officers, voluntary and community groups and other local and national stakeholders. This section draws on these discussions and highlights

² Here 3.5 members of staff means three full-time and one part-time.

recommendations in line with the evidence and best practice as it was heard by task group members.

Throughout the course of the task group's work three recurrent themes emerged from which the task group's recommendations have been drawn, including:

1. The need for a comprehensive IER roll-out programme and communications strategy which is characterised by intelligence-led targeting of areas and at-risk community groups. The strategy should use clear and effective messaging;
2. The need for more effective work with partners including the voluntary and community sector, housing and other statutory and non-statutory partners; and
3. The need for enhanced civic engagement with the community (e.g. improved civic education and greater outreach by elected members).

6.0 Development of a comprehensive IER roll-out programme and communications strategy

The development of a comprehensive IER roll-out programme and communications strategy must take into account the fact that data collected and used through the dry-run matching exercise provides only a snap-shot in time picture of low matching households.

Having consulted with colleagues in the Research and Intelligence team, the engagement strategy has identified the highest (and lowest) matching wards as well as those best and worst performing polling districts. This breakdown will guide efforts to target those areas where matches are lowest.

Allied to this place-based approach of targeting particular polling districts, an effective communications strategy must be at the heart of the IER roll-out programme. It must convey the appropriate messages about IER to the groups identified as most at-risk and be tailored to the demographics of the borough. Crucially, this will be dependant on producing clear and effective communications products and utilising the most appropriate mediums to reach these demographics.

6.1 Place-based targeting

Representatives of Electoral Services and Research and Intelligence teams told the task group that they have conducted a full breakdown of the results and highlighting the lowest and highest matching wards and polling districts. This is important because it will enable Electoral Services and Communications colleagues to target specific polling districts and wards with the highest overall number of Amber and Red matches.

Based on a weighted average³ the highest matching wards in Brent were Kenton (79%); Queensbury (76%); Welsh Harp and Dollis Hill (74%) and Fryent and Stonebridge (73%). With the exception of Stonebridge, these wards share similar characteristics that typically characterise high voter registration, such as higher relative affluence, owner-occupancy and low levels of transiency.

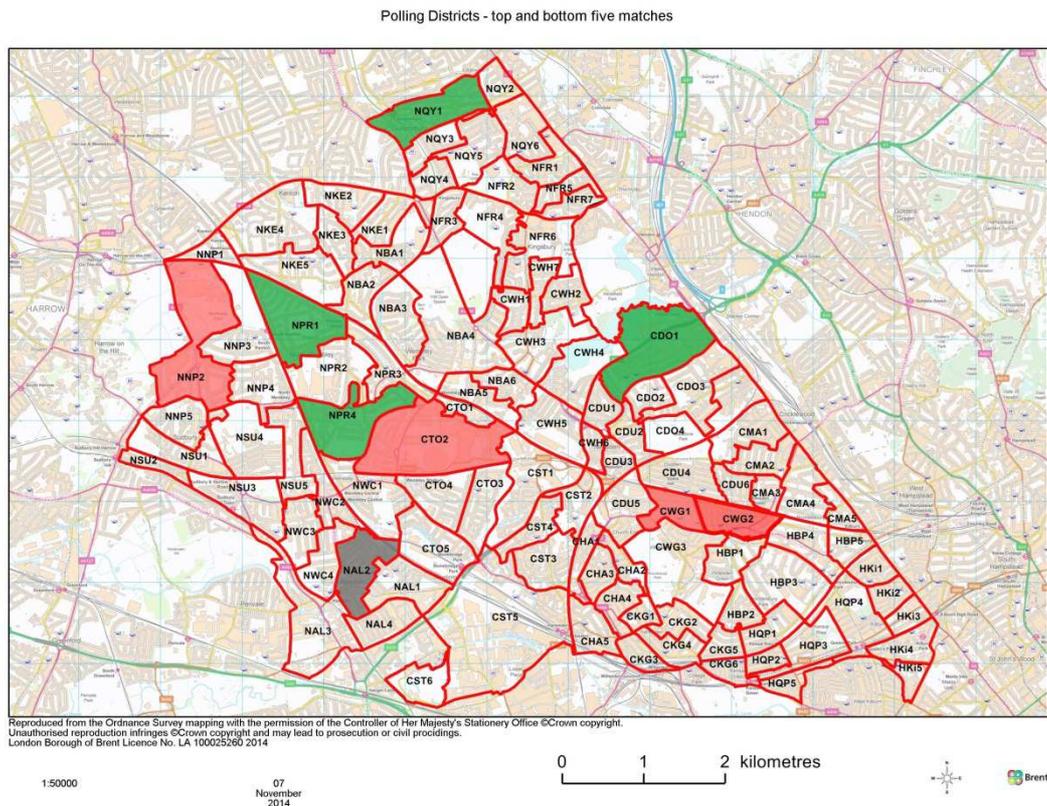
³ It is important to note that some of the lowest matching wards may be attributed, in part, to the fact that there are fewer people within these particular polling districts, making like-for-like comparisons difficult.

The lowest matching wards (Amber and Red) in Brent are: Willesden Green and Mapesbury (56%); Kilburn (58%); and Kensal Green and Brondesbury Park (61%). These wards tend to contain more mixed demographic trends.

Interestingly, both the highest and lowest matching polling districts are not necessarily located within either the highest or lowest matching wards as a whole. A breakdown of postal voters who have not been successfully matched is also included as Appendix C.

Figure one, below, illustrates the top five highest and lowest matched polling districts in the borough.

Figure 1: Top five highest and lowest matching polling districts



The highest matching polling districts in Brent are:

- NAL2 - Alperton (3037);
- NPR1 - Preston (2771)
- CDO1 – Dollis Hill (2695);
- NPR4 - Preston (2612); and
- NWC1 – Wembley Central (2574).

The lowest matching polling districts (Amber and Red) in Brent are:

- CTO2 - Tokyngton (1675);
- CWG2 – Willesden Green (1528);
- CWG1 – Willesden Green (1326);

- NNP2 – Northwick Park (1262); and
- NAL2 – Alperton (1165).

Interestingly, one polling district (NAL2) located in Alperton which is highlighted above in grey has the highest number of Green matches (highlighted in green) and the fifth highest number of Amber and Red (highlighted in red) matches. This is due to this polling district having the largest population of any polling district in Brent.

The task group recommends that when developing the IER roll-out programme, the lowest matched polling districts and wards are targeted.

6.2 Targeted communications

The Electoral Services' Public Engagement Strategy, which has identified some general demographic characteristics prevalent in low matching wards which may be helpful in developing a robust and inclusive communications strategy. However, the diverse and changing nature of the borough as a whole means that no assumptions may be made about the low-matching wards and polling districts as a factor leading to households from these backgrounds not being registered to vote. **The task group, therefore, recommends further work be carried out to establish key target groups so that bespoke tactics may be used to reach more eligible voters. This would include an assessment of what, if any language barriers there may be.**

6.2.1 Every contact counts - maximising council contacts with residents

Throughout the work of the task group, it became apparent that one of the simplest forms of communication with residents has largely been over-looked. Members questioned why information on the changes to voter registration were not displayed on emails and automated messaging services, such as those used by customer services when a resident places a call to council and is held a queue.

Brent's libraries and leisure centres are another great point of contact between the council and residents. These facilities not only distribute information but also accept applications from residents, particularly from those new to the area. Applications for library cards, blue badges and leisure centre memberships would be ideal contact points for registering new voters. Likewise, private leisure centres and gyms could also be contacts to engage new voters.

The task group, therefore, recommends the Electoral Services team adopt the NHS' 'every contact counts' approach to ensure contact with residents is maximised to include email footers, automated messaging, library card and blue badge applications. This approach should also be extended to council and private leisure centres and gyms.

6.2.2 Proximity, broadcast messaging and social media

Communications officers told the task group that the tactics of the strategy were yet to be decided on as officers in electoral services were still registering electors through the national campaign and the letters sent out over the summer. However, officers did say that there are a number of ways of targeting the hard-to-reach groups, mentioned above and one method that may be employed is broadcast messaging. 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.

A further challenge 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.

In giving evidence to the task group on potential tactics, the communications officers 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.

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.

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.

6.2.3 Promoting the positive and negative effects of not being on the register

From the outset, the task group has been keen to learn from colleagues as to what messages may reach those who may not engage through the national campaign. As such, members were keen to emphasise that the council ought to be promoting electoral registration and the positive benefits of civic participation.

In addition to the positive benefits to civic engagement, members also wanted to establish what other, non-democratic, reasons there were for registering to vote and being included on the register. According to both the Electoral Commission and Experian⁴, 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

⁴ Experian, "Credit Report Basics"

- Rent a property (a credit check is sometimes required in the referencing stage).

Therefore, the task group recommends that the communications strategy develop messages around the benefits of civic participation and why it is important to register, as well as any negative consequences of not being listed on the register.

6.2.4 Advertising and the registration form

When discussing the communications materials sent out to residents, representatives from Electoral Services showed members of the task group the letters and registration form, as noted above.

Ann O'Neil, CEO of Brent Mencap, stated that individuals with learning difficulties may not be able to understand what the messages are and what is required of them. Specifically, the advertisement with hands (see Appendix D) contained too many, small-font words. The statutory registration form, developed by the Electoral Commission (see Appendix E) and the Household Enquiry Form (see Appendix F), could also 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. Members of the task group also commented that the registration form could be improved in a similar way to the advertising materials.

In line with the suggestion made by representatives from Brent Mencap, the task group recommends that any advertising is made clearer and that headings are kept bold, snappy and straightforward to better communicate with residents (see appendices G and H for examples of best practice from other local authorities). It is also recommended that the covering letter sent out by Brent's Electoral Services be made more straightforward and easy to understand.

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 some Muslim women and older Irish men, the latter who mainly worked informally in the construction industry who never applied for an NI number.

Therefore, the task group recommends that it is made clear in the council's covering letter that unique identifiers other than an NI number can be used to register (see appendix A 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.

7.0 Need for effective use of partners including the voluntary and community sector, housing and other statutory and non-statutory partners

7.1 Increased engagement through the Voluntary and Community Sector (VCS)

Brent's VCS organisations are often very successful at communicating with some of the borough's hardest-to-reach groups and frequently offer unique services to communities in Brent. For this reason, they are ideally placed to feed into the roll-out of IER, specifically by working more closely with Electoral Services during the canvassing periods. In giving

evidence to the task group, officers in Partnerships and Engagement suggested that Brent VCS organisations could play a threefold role:

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

Given that VCS 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.

- Highlight barriers to trust: In this capacity, Brent's VCS 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 VCS 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.
- Share experiences of civic participation projects: Local VCS organisations such as Brent Mencap can use their local knowledge and expertise to feed-in relevant information. Local democracy events may also provide an ideal opportunity for such experiences and expertise to be fed into the IER roll-out programme.

Brent's Partnerships and Engagement team work with CVS Brent to interface with Brent VCS 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.

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's VCS organisations. The most relevant VCS organisations is included as Appendix I to this report for ease of access.

As such, the task group recommends that the council work closely with Brent's Partnerships and Engagement team and CVS Brent to take full advantage of the VCS sector, both in terms of delivering registration services and in providing information to the council about outreach work in the community.

7.2 Increased engagement through adult social care contracts, public health and disability networks

The task group took evidence from officers in Public Health, Adult Social Care (ASC) and Brent Mencap about the potential role that all three could play in feeding into the roll-out of IER through core frontline services.

7.2.1 Adult Social Care (ASC)

Representatives from Brent's Adult Social Care told the task group that nationally under-registration is particularly high amongst residents with learning difficulties, with approximately only 10% being registered to vote. Despite this 79.8% of residents in A1 social care in Brent are on the electoral register, which is higher than the general Brent population of 67.6%.

The types of care may receive can be broadly grouped into the following two categories:

1. Service users; and
2. Those outside the reach of formal services.

Service users can be informed and encouraged to register directly when they come into contact with formal council services. The second group is harder to reach; it was suggested by officers from ASC that reaching the second group would require partnership working with local VCS organisations such as Brent Mencap. **Therefore, the task group recommends that Electoral Services works with both ASC and external partners such as Brent Mencap to ensure that residents with learning difficulties are successfully registered.**

Representatives from ASC also told the task group that the IER roll-out could make use of the NHS' 'Making Every Contact Count' programme which encourages all staff to engage in conversations about healthy living on a day-to-day basis whenever they come into contact with service users. **It is, therefore, recommended by the task group that ASC staff inform residents about IER as part of the 'making every contact count.'** **To counteract such difficulties, the task group recommends that the council develops clear guidelines to inform both residential and domiciliary carers of their civic duties regarding those under their care.** This would ensure that they are aware that those in care have the same voting rights as everyone else. This should be integrated into contracts.

The guidelines and contract clauses 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.**

7.2.2 Public Health

The Director of Public Health told the task group that two of the main commissioned services that would be most appropriate to engage with are the substance misuse and mental health services.

The Director of Public Health said:

“Civic engagement is promoted by Public Health for residents in recovery from substance misuse and mental health problems. Whilst this is a relatively small proportion of Brent’s residents, service users could be registered when they come into contact with health services, both as part of the IER roll-out and their recovery process.”

Brent’s Director of Public Health also told the task group that for those in formal services, registering to vote may not be a priority for patients during an acute illness or the early stages of recovery. However, the informal service pathway provides an opportune time to integrate civic participation into an individual recovery programme.

The task group recommends that the council’s Public Health function should encourage sign-up to IER through its commissioned services.

A further issue raised was that there may be a correlation between not being on the electoral register and not being registered with a GP. Working with NHS England would enable the council to establish accurate figures about the number of residents who are registered with GPs and who may or may not be on the electoral roll; the council could then encourage GPs to sign up residents to IER when they register with a new practice.

Therefore, the task group recommends that the Electoral Services team work with GP practices, dentists, opticians and pharmacies to encourage voter registration.

7.2.3 Disabilities

Residents with disabilities are also identified as being at risk of failing to register. 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.

The task group further recommends that the council ensure that polling stations are fully accessible to disabled residents and that staff are appropriately trained.

Ann O’Neil, CEO of Brent Mencap, 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 Annual General Meetings for VCS organisations to raise the issue of IER;
- Involve CCG partners and use their engagement events such as the next Health Partners Forum; and
- Place leaflets at health centres and GPs and ask community nursing teams to hand them out to people who are housebound.

7.3 Housing

The task group met with officers from Housing to discuss the changing nature of Brent's housing sector and what impact it might have on voter registration, as well as the potential to improve registration through landlord licensing in the Private Rented Sector (PRS).

Given the demographic trends associated with those who are at risk of not registering, 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 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, including:

- 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.

7.3.1 Estate agents and private landlords

A new and significant phenomenon for Brent is the vast growth of the PRS during the last decade, with 32% of residents now living in the sector. This is primarily concentrated in the south of the borough but is increasing in the north. 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.”

Therefore, the task group recommends examining the possibility of working with estate agents in Brent to incorporate IER registration into potential 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.”

The impact of this is that both estate agents and the council do not have exact information on how many people are actually living in any given property. Francis Henry suggested that the way to combat this is for a single, fixed fee regardless of the number of tenants. This would provide a greater accuracy in knowing who is living in each property as the incentive to illegally sub-let or not declare additional tenants is reduced.

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.

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.

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, as part of the licensing procedure, clear guidelines are developed around this issue.**

7.3.2 Landlord Licensing

In order for the council to better cope with this increase in the PRS, licensing is being introduced in 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.

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 roll-out programme.

7.3.3 Brent Housing Partnership (BHP)

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. Officers 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.

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 has said that they are happy to allow canvassing in their properties provided security guidelines are adhered to.

7.3.4 Right to Rent

Under Right to Rent, 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. By legally requiring that landlords obtain evidence of identity and citizenship prior to letting to new tenants, the council 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.

A clearer picture of these two groups could subsequently inform a more accurate and targeted IER roll-out programme. **Therefore the task group recommends that the council monitor the developments around right to rent for any impact it might have on information gathering and communication with residents.**

7.4 Universities and Colleges

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 a high number of students will be too.

The University of Westminster has two halls of residence in Brent; Victoria Hall and Student Court which are managed by an external provider. At present neither the University nor the external provider are taking any steps to register students in either of the halls. Electoral Services, however, have attended fresher's week at local higher education institutions to register students.

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.

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.

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.

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.

Therefore, the task group recommends that the council scopes the capacity to work with The University of Westminster and other institutions with high numbers of students such as the College of North-West London to potentially develop a student model of IER registration that could be integrated into enrolment processes similar to the Manchester model.

7.5 Other public services

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.

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.

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.⁵

Labour have said they will implement a similar system if they win power at the next general election.⁶ 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.”

The task group recommends that Brent Council and the GLA effectively lobby Parliament to introduce legislation similar to the NVRA.

⁵ The Electoral Reform Society (09/12/13) “Electoral Registration – Order and Regulations briefing”, House of Lords Grand Committee

⁶ Mason, Rowena (20/02/14) “Labour is considering allowing voters to register on election day”, *The Guardian*

8.0 Enhanced civic engagement with the community

8.1 Young people

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. Bite the Ballot is a non-partisan organisation that seeks to boost the civic engagement of young people. Electoral Services could potentially work with Bite the Ballot to engage with young people in the borough.

The Bite the Ballot Community Engagement Officer (CEO) programme was created in 2013 with the purpose of placing young and inspirational individuals in local authorities to engage, inform and register all young people in the area so that they can fully participate in civic life. Candidates will have to be embedded in their communities to take account of differing local characteristics. The CEO will undertake the following key activities:

- 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; and
- Assist the council with their youth outreach work.

An officer 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.”

The task group was also informed that young people involved in the Brent Youth Parliament could potentially engage in focus groups to inform the communications strategy. **The task group recommends that the council work closely with Bite the Ballot to register young people and that young people be actively involved in the development of communications materials aimed specifically at young people.**

8.2 Hope not Hate

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 Pop 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.

In addition to this, Elisabeth Pop 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.

Manpreet Chhokar 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 – informing and reminding people of the value of civic engagement.”

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

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

The task group recommends that Brent Council and elected members work closely with HnH to better engage with local VCS 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.

8.3 European Union, Commonwealth subjects and new citizens

European Union (EU), Commonwealth and other new citizens 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.** This could be done through the council’s Community Access Strategy.

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.

It is also recommended that canvassers also include visits to specialty shops catering to residents from these and other diverse backgrounds. Elected members could help with this by placing posters in shops catering specifically to EU, commonwealth and new citizens and work directly with larger employers in the borough such as Ikea and Tesco to canvass large numbers of residents. Community notice boards could also be an ideal place to display flyers about IER.