

**Electoral Commission, Call for Evidence on Electoral Registration Officer Draft Standards -
response made by The Runnymede Trust on 31st March 2020**

Do you think the draft standards will support EROs with understanding and improving their own performance?

The draft standards are a good first step in supporting EROs with understanding and improving their own performance. However, we would like the draft standards to go further. We know from the Electoral Reform Society and Electoral Commission figures that [1 in 4 ethnic minority voters are not registered to vote](#). We have also found, from our own survey and qualitative research with EROs in January 2020, that EROs, often through no fault of their own, are not aware that both ethnic minority voters and commonwealth voters are unregistered to vote when they are entitled to be. We believe that the draft standards could be more prescriptive or directive, highlighting some of the groups which are currently missing from the electoral register.

Do you think the standards will enable the Commission to understand the performance of EROs and to identify where support and challenge is needed?

Yes, the standards can enable the Commission to understand this. However, the Commission should give EROs clearer guidance within which to work. Currently the guidance with these proposed changes is very broad which will further encourage an ad-hoc approach being taken by EROs when targeting registration.

Are the standards focussed on the right outcomes?

Many of the areas are correct. However we would like to see more specific KPIs/objectives set out along with registration targets. If a council has data which means that they know a particular minority group is under registered this should be reflected within their strategy and goals. This is likely to be mirrored if the Electoral Commission is slightly more specific on the advice that it gives to EROs regarding both ethnic minority voters and Commonwealth citizens.

Do the draft standards demonstrate a clear link from inputs through to the overall outcomes?

N/A

Do the standards focus on the right activities?

The standards still feel somewhat open for interpretation as currently it is leading to ad-hoc voter registration strategies which are not based on the evidence of what we know about voter participation. For example when the standards state: 'Contact potential eligible electors, including carrying out work to target hard to reach groups' and 'Using available data and information sources, identify those not registered, including hard to reach groups', we believe that this could be more specific. We know that councils have a huge amount of data that could be used to better target those unregistered groups - very often being ethnic minority and commonwealth citizen groups.

Do you have any thoughts on the measurability of the impact of the activities set out in the draft standards?

Language, for example, was a reoccurring issue raised by EROs in our survey and qualitative research earlier this year in relation to unregistered voters from ethnic minority and commonwealth backgrounds. However, many councils only offer language translations upon request which seems counterintuitive; how can language be a demand led service when those who require that language would not know how to ask for it? We would like to see impact being measured based off what the true needs of the unregistered voters are (in this case there being a stronger access to translation services)

Do the standards cover the full range of responsibilities of the ERO? Are there any gaps or is there anything included that shouldn't be there?

The draft standards state: 'identification and allocation of budget and staffing for electoral registration activities' - this is welcome and important. However, again, we feel that this could be tightened. How will the ERO and their teams fully understand what their responsibilities are if they are not collecting and monitoring the data in relation to set objectives? Some parts of the council collect ethnicity data for example, but do then not feed this back to the electoral teams. Some councils no longer have outreach engagement officers who would get in contact with many unregistered groups. We believe it will help EROs to fully understand the range of their responsibilities if the Electoral Commission highlights the lower registration rates among particular ethnic minority groups and Commonwealth citizens.

Do you think the standards and the types of additional tools the Commission intends to provide will support EROs to understand and report on their own performance?

We are concerned that the Electoral Commission standards do not mention voter registration issues with ethnic minority or commonwealth voters. These are two groups that we know have overall levels of low registration. If the Commission is not more specific about this and does not provide EROs and their teams with the additional tools to identify these issues, the performance of the EROs will not be reflected in increasing levels of registration amongst ethnic minority voters and Commonwealth citizens.

Are there any other additional tools and guidance that would help to support EROs in using the standards?

The collection of ethnicity data in relation to ERO voter registration success would be extremely useful given that we already have the government's Race Disparity data website. In addition, some of the good practice that EROs already use with working closely with education, homeless and disabled organisations could be applied to working with civil society or community organisations involving ethnic minority and/or commonwealth citizens.

Will our proposed approach to how we engage with EROs and their teams enable us to provide effective support and challenge?

The standards are a good first step but we would encourage the Electoral Commission to explicitly highlight under-registration of ethnic minority and Commonwealth citizens.

Is there anything more or different we should be using the standards to do?

The standards should highlight that commonwealth citizens are often unaware of their rights and abilities to vote in this country.

Do you have any views on the proposed approach to reporting?

No