

**Wirral Council's preparations for
Individual Electoral Registration**

Scrutiny Review

A report produced by
The Policy & Performance Coordinating Committee

WIRRAL BOROUGH COUNCIL

***Wirral Council's Preparations for
Individual Electoral Registration
Scrutiny Review***

FINAL REPORT

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1. EXECUTIVE SUMMARY

Individual Electoral Registration is due to be introduced in 2014 and will transform the way Local Authorities' are required to compile their Electoral Registers. A national timetable is being coordinated by the Cabinet Office which requires Councils to meet a range of key preparation milestones. This scrutiny review has been conducted to ensure Wirral's preparations are robust and that any potential issues or problems are understood and are being addressed.

The success of the transfer from the existing property-based register to the IER register is dependent on a combination of national and local data-matching exercises. Initial testing of the data-matching process suggests Wirral's results will be above the national average putting us in a strong position to establish the new register in summer 2014. However, the full potential of local data-matching is yet to be fully realised and will be dependent on the availability of local data sources.

Recommendation 1: Where access to Council held data is required for the purpose of data-matching to support the transfer to IER, this is made available (in line with legal requirements) to the Elections Team in a timely manner.

The Review Panel acknowledged the crucial role all Council Members will have in terms of communicating the changes and encouraging constituents to take action if they are not automatically transferred to the new IER register. The Panel also recognised the value that Members' local knowledge will have in supporting implementation. Therefore, keeping Members informed during preparation and implementation will be essential.

Recommendation 2: The Head of Legal and Member Services to coordinate periodic briefings with all Members as a means of maintaining two-way communication to support the implementation of IER.

Recommendation 3: Chairs of constituency committees are requested to include IER as a topic for discussion as part of their forward planning in the New Year.

The Cabinet Office is committed to supporting the costs of implementing IER. The Review Panel considered the financial implications for Wirral in the light of the funding allocation provided. Whilst the budget forecast will need to be worked up in more detail as further information becomes available in 2014, the initial forecast indicates there will be sufficient resource available including a reasonable contingency.

The Review Panel sees the transfer to IER as a major opportunity to highlight the importance of electoral registration and use the additional resources available to maintain existing levels of registration and concentrate on those areas where levels of registration are lower.

Recommendation 4: The Head of Legal and Member Services should ensure that funds are used in accordance with Cabinet office requirements/conditions and where possible used to support additional targeted engagement and canvassing activities, using the IER process as a vehicle to maximise electoral registration, and for contingency purposes.

Overall, the Panel found this review to be very informative. In particular, the results and analysis of the Confirmation Dry Run data-match exercise with Census 2011 data were considered to be very useful and provided a level of detail that Members have never seen before. The Panel agreed that this information should be available to all Members and through the Council's website.

Recommendation 5: The Head of Legal and Member Service to make Ward data on IER and non-registered eligible voters available to all Elected Members and via the Council's website.

This review is a good example of horizon-scanning scrutiny in that IER is a national initiative being launched in 2014. The review has provided an opportunity to consider the potential issues in relation to implementing IER locally. In this sense the review has been an assessment of the Council's readiness at a particular point in time. It was recognised by the Panel that a further update is reported to the Policy and Performance Committee closer to the transition going live in June 2014.

Recommendation 6: The Head of Legal and Members Services should prepare a report to the Policy and Performance Committee providing an update on preparations for IER closer to the launch in June 2014.

2. INTRODUCTION

At the meeting of the Policy and Performance Coordinating Committee on 3rd September 2013, Members approved a work programme which included a review of the Council's preparations for Individual Electoral Registration (IER). A Scrutiny Review Panel of four Members of the Committee was established and a series of meetings were held in Autumn 2013. The purpose of the review was for the Panel to gain an understanding of the implications of IER for Wirral. This would enable the Panel to test the Council's readiness for this new approach to compiling the electoral register and seek assurance that preparations are in hand. This reports sets out the background, methodology, findings and recommendations arising from this work.

3. BACKGROUND

In 2014 the Government is changing the way people register to vote. Under the current system one person can register all occupants in the same household. Under the new system, called Individual Electoral Registration (IER), everyone will be individually responsible for their own registration. This approach sees the UK following practice in other countries and will pave the way for on-line registration (currently scheduled from June 2014).

Most people on the register before June 2014 should be automatically transferred to IER and should not need to do anything else. However, some people will need to provide additional information in order to stay on the register and will be sent letters inviting them to register under the new system. The process to register will involve residents providing their name, national insurance number and date of birth. This information will be checked to verify they are eligible to vote. In the case of those whose details cannot be verified, they will not be removed from the register until after the next General Election.

The shift to the new electoral register is being centrally managed by the Cabinet Office. A national timetable has been published with local authorities being individually responsible for meeting a series of milestones in order to prepare for the new system. The logistics of shifting from the current property-based register to the new IER register involves a major data-matching exercise. This will involve councils sending their existing registers to Cabinet Office for these to be data-matched with personal data held by the Department of Work and Pensions. This is scheduled for July 2014, with the IER register to be compiled from then and published on 1st December 2014.

A Confirmation Dry Run (CDR) run of the data-match process was completed during summer 2013. This also acted as a test for local authorities to demonstrate the compatibility of their IT software with that being used nationally. The result of this exercise was better than expected with a match rate of 78% across the country leading to confirmation by the Electoral Commission that preparations are sufficiently ready for IER to go ahead as planned in 2014.

In terms of the cost implications, Cabinet Office has stated its commitment to meeting the full cost, with £108M being allocated nationally. Allocations are being made to local authorities for the years 2013/14, 2014/15 and 2015/16.

4. ORIGINAL SCOPE AND METHODOLOGY

4.1 Scope

This review is a good example of horizon scanning scrutiny. At the time the review was conducted, planning for IER had commenced, but preparations were still in their early stages. This was acknowledged by the Panel and informed the scope of the review. The agreed scoping document is included at Appendix 1 and focussed around four key objectives as follows:

1. For the Panel to be satisfied there are robust arrangements in place for the implementation of IER.
2. To have a good understanding of the potential issues and problems in implementing this new system.
3. That Wirral is not financially disadvantaged by implementing IER.
4. That all opportunities are taken to use IER as a vehicle to maximise registration.

4.2 Methodology

A combination of information sources were provided to the Panel. This included a number of documents to provide the national context and overall picture i.e. an IER Policy Briefing from the Local Government Information Unit and a summary report of the national results of the Confirmation Dry Run produced by the Cabinet Office. However, the main emphasis of the Panel was to develop an understanding of the local implications both at a borough-wide level and on a ward by ward basis. This was achieved by the Panel requesting a series of reports to cover the following:

- A detailed analysis of the results of the data-match Confirmation Dry Run (CDR) as well as those communities (geographical and thematic) where registration is lower
- The proposed strategy for maximising engagement and registration (with particular reference to those communities)
- A forecast of the financial impact of IER and whether this can be achieved from within existing resources assisted by the additional allocations from Cabinet Office for 2013/14, 2014/15, 2015/16.

(These reports are available on request).

The reports were followed up by a detailed question and answer session with key officers from the Council. This included the Head of Legal and Member Services and the Principal Electoral Services Officer. The review was carried out over three Panel meetings. A short review was adopted as a means of carrying out an assessment of the Council's preparations for IER at a point in time. It was acknowledged that a further update on progress should be considered by the relevant Policy and Performance Committee later on in the preparation process.

5. FINDINGS AND RECOMMENDATIONS

5.1 Early Preparations

The Chief Executive as the Borough's Electoral Registration Officer has responsibility for implementing IER. In terms of delivery, the Head of Legal and Member Services oversees the Elections Team and the IER Project Team. It is recognised IER requires a corporate approach and the project team has had input from the Improvement Team, IT Services, Marketing & Communications and Corporate Policy. The Council's early preparations for IER has focussed on three key areas:

- 1. The procurement and installation of a new Electoral Management System** – The Council's existing system was over ten years old and in need of replacement. A new, IER compatible system was procured through a joint tender with the Cheshire and Merseyside Authorities. This was implemented with considerable support from IT Services to a tight deadline in July/August 2013 in advance of the CDR data-matching exercise.
- 2. The successful completion of the CDR and local data-matching** – Wirral's CDR was completed on 19 August. Wirral's test result 83%, exceeded the national average of 78%. A further data-matching exercise with locally held Council Tax data resulted in the success rate being increased to 89%. This indicates that Wirral should have a strong foundation for transferring the current register to the IER register in July 2014.
- 3. Developing a partnership approach with the Cheshire and Merseyside authorities** – This ensures a consistency of planning and preparation as well as providing an opportunity to share ideas and good practice. The Cabinet Office expects Council's to develop a range of project, risk and engagement plans and the partnership ensures Wirral's preparations are consistent with those of other authorities in the sub-region.

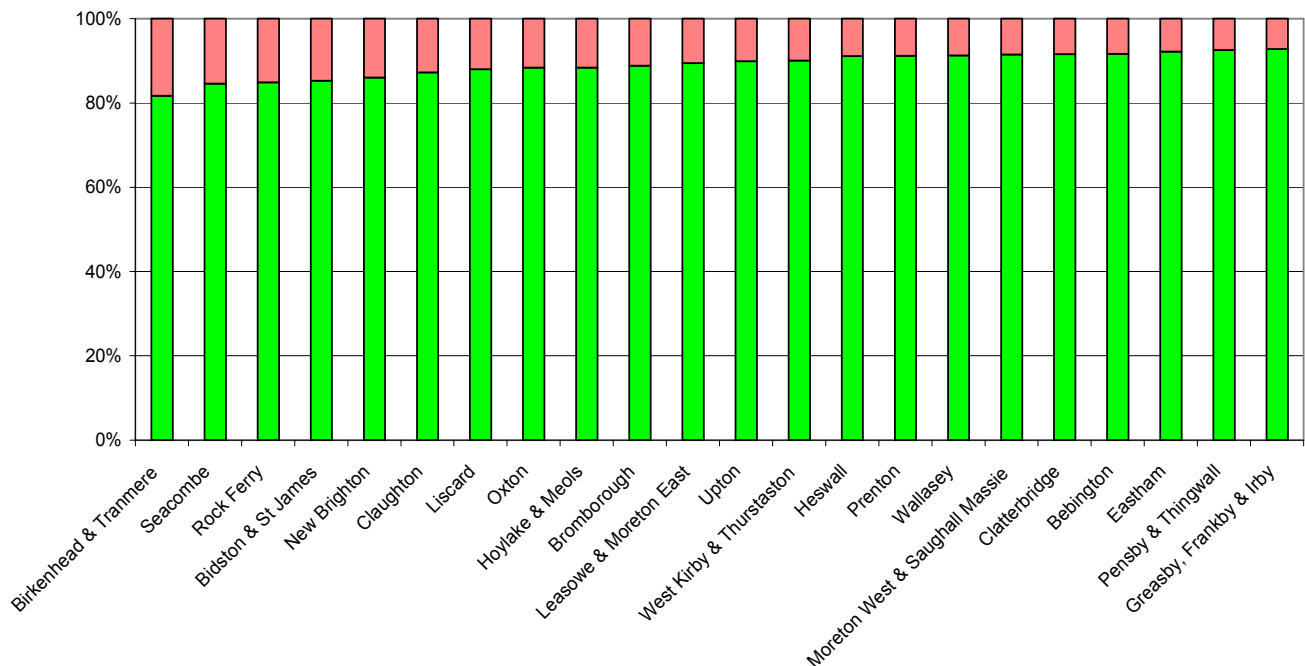
5.2 Analysis of Data-Matching Results and Census 2011

Overall, the results of the CDR and local data-matching indicate that out of the 239,814 people on the Electoral Roll, 213,792 would be confirmed under IER, a rate of 89%. Further local data-matching will be undertaken to reduce the number of red non-matches further.

Given the amount of information held by the Council in different departments, a hierarchy of data sources has been identified including housing benefit and schools data that will assist this work. Given issues around the Data Protection Act, it was highlighted that some departments may be less inclined to readily share data. However, the Council's Electoral Registration Officer does have the power to access all Council held data and Members of the Panel were keen to ensure there are no obstructions to the Elections Team accessing data in order to maximize the level of matching to the new IER register.

Recommendation 1: Where access to Council held data is required for the purpose of data-matching to support the transfer to IER, this is made available (in line with legal requirements) to the Elections Team in a timely manner.

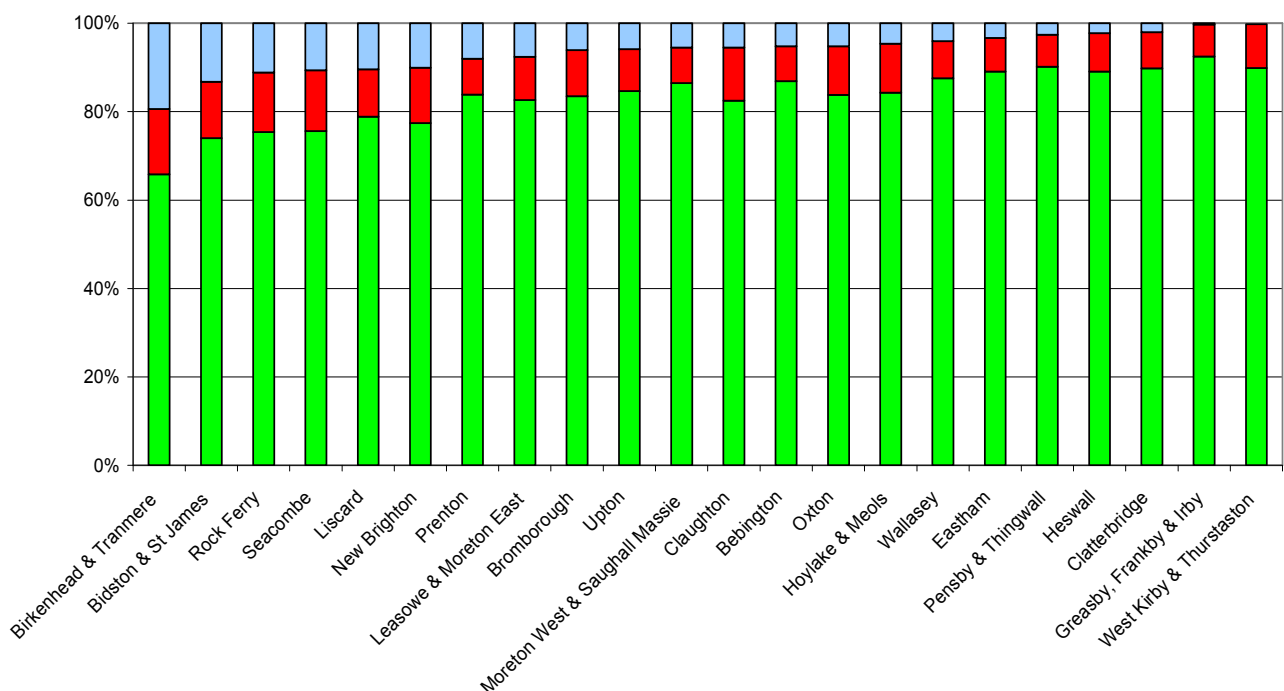
A detailed analysis of the results of the CDR and local data-match was provided to the Panel (see chart below). This provides a ward breakdown showing the number of positive (green) matches and non-matches (red).



This shows a fairly consistent picture of voters being successfully transferred across all wards, although it is interesting to note that the success rate is lower in those wards which have higher levels of known deprivation.

Further analysis was undertaken to explore levels of voter registration more generally using Census 2011 data to estimate the number of people over the age of 17 in each ward that do not appear on the register.

The chart below combines the results of the data-match exercise with the estimated percentages of non-registered voters. As in the previous chart, green indicates positive matches with red showing the negatives. Blue indicates the estimated proportion of the electorate who are not on the electoral register. The order of wards has the highest proportion of non-registered voters (Birkenhead and Tranmere) to the left.



This analysis shows a strong correlation between areas with higher levels of known deprivation and negative matches from the CDR exercise as well as levels of non-registration

more generally. The Panel noted that whilst the overall picture for Wirral at a borough-wide level is positive, the analysis shows there are some wards which are a cause for concern, including Birkenhead & Tranmere, Bidston & St James, Rock Ferry, Seacombe, Liscard and New Brighton.

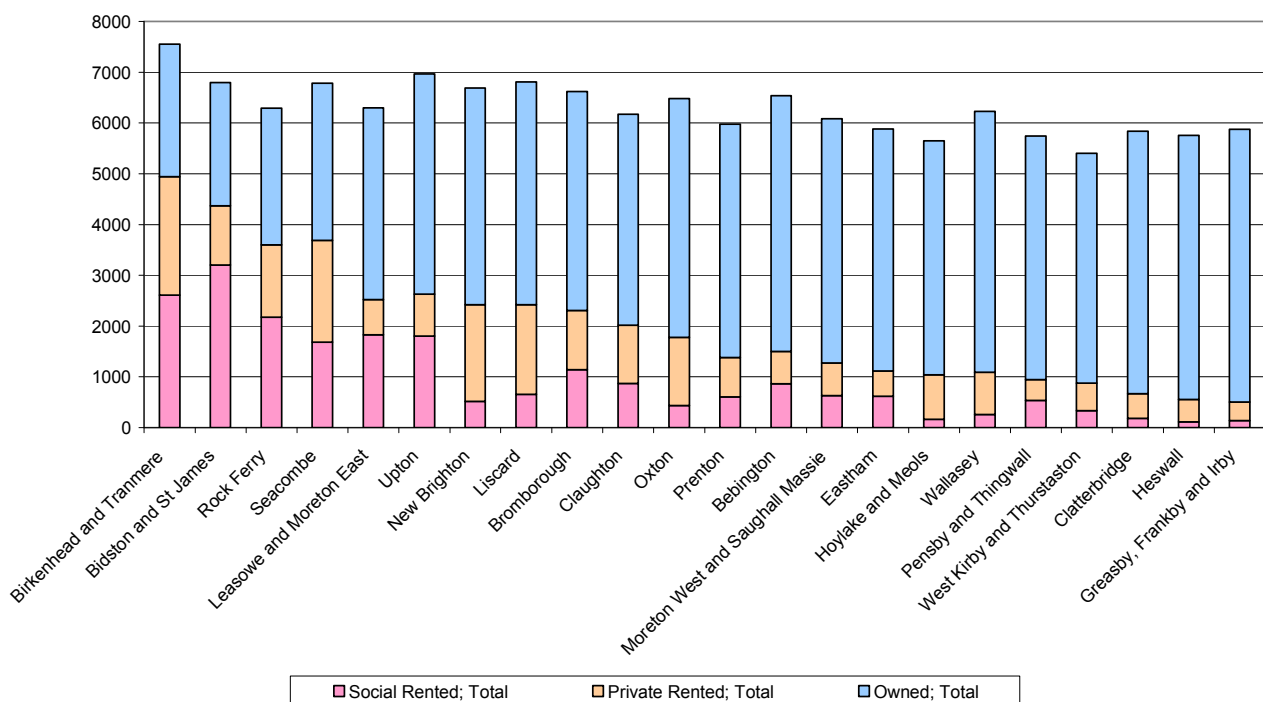
Members were interested in Wirral's track record in getting new people on the register and what the challenges are to this. The current estimate of voters registered in Wirral is 92% which is above the national average of 90%. The challenge in getting this figure higher is resources, as there comes a tipping point in the cost-effectiveness of this given there will always be a residual number of people that do not want to or refuse to register.

One of the best incentives for encouraging registration is to make people aware of the negative impact it has on their credit rating. Members of the Panel highlighted concerns that currently many voters are reliant on other people registering them and with the introduction of IER the responsibility will fall on individuals to register themselves.

Additional analysis provided, highlighted those factors which are likely to impact on lower levels of voter registration amongst certain sections of community. These include:

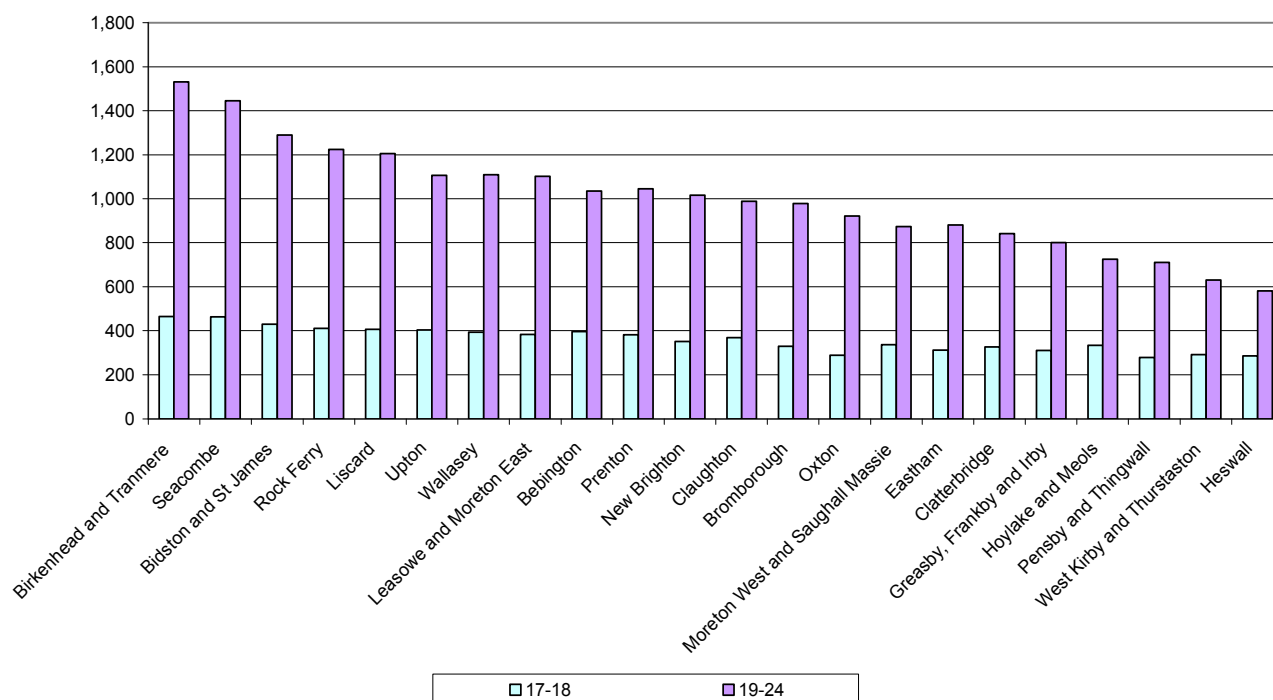
- People in rented accommodation (private and social)
- Young people
- Home movers

Apart from home movers which are randomly dispersed, geographical analysis of the proportions of people living in rented accommodation (see below) shows a strong correlation with those areas that have lower data-match results and higher numbers of non-registered voters.



In terms of the geographical dispersal of young people aged 17 – 24 (see chart below), this tends to follow the same pattern of distribution as rented accommodation again showing the correlation with areas that have lower data-match results and higher numbers of non-registered voters.

Numbers of Young People by Ward



National analysis by the Cabinet Office explores BME communities as being at risk of under-registration. However, findings did not suggest that BME groups were statistically less likely to be registered than their white peers who otherwise share the same characteristics.

Using the Census 2011, local analysis was undertaken regarding the distribution of non-UK born residents. This indicates that apart from Birkenhead and Tranmere, the distribution of non-UK born residents is fairly evenly dispersed. Members were concerned that there is insufficient data held on BME and non-UK born communities such as the emerging Polish community. It was suggested the Council's engagement with minority communities would need to be coordinated through second-tier representative organisations such as Wirral Change and Wirral Multicultural Organisation.

5.3 Draft communications and engagement strategy

The communications campaign supporting the role out of IER will be managed centrally through Cabinet Office / Electoral Commission and is scheduled to launch nationally in June 2014. It is essential the local campaign aligns with the timetable and messaging nationally to ensure consistency. As part of planning milestones, local authorities have been required to submit early draft communication and engagement strategies to Cabinet Office. A copy of the draft strategy was provided to the Panel. The strategy was drafted prior to the results of the CDR data-match analysis and will need to be further developed in due course.

Officers highlighted that local communications and engagement activity would operate on two levels. There is a need for a general awareness-raising campaign targeting all voters with generic messaging about the shift to IER and promoting electoral registration. This work will dovetail with national and sub-regional campaigns when they go live in 2014. Alongside this, a more targeted approach will be needed involving communications with key partner organisations in line with the under-represented groups set out above in section 5.2. Specifically schools, landlords / tenant groups and membership organisations that support

hard to reach communities. Members highlighted the opportunity to work with landlords through the network of Registered Social Landlords and the Council's Private Landlord's Association.

A further level of more detailed targeting will need to be coordinated through a new approach to delivering the annual canvas which reflects the ward by ward analysis non-matches and non-registered voters. The annual canvas is the means for compiling the electoral register, although work updating the register continues throughout the year. Currently there are 103 Polling Districts in Wirral and 80-90 canvassers. Usually a Polling District is allocated to one canvasser with some picking up a couple of districts. The CDR result provides a rationale for allocating resources in a much more targeted way. This will not be developed until 2014, as we are currently in the middle of the canvass for the local and European Elections next May.

The Panel was also advised that the type of work canvassers do will need to change, with more information being requested at the doorstep and the need for a strategy to respond to emerging issues depending on how people react. This approach will provide canvassers with the opportunity to highlight the legal requirements of registration and the wider benefits i.e. the positive effect on an individual's credit rating. Next year, the canvass period commences in July and continues through till 1st December when the IER register will be published. The process of IER effectively changes the whole approach to canvassing, but this process is yet to be finalised.

Members acknowledged that the draft communications and engagement strategy contains a range of different communication channels as some forms of communication i.e. the local free press are restricted in their coverage. Members were keen that all opportunities to engage with partners and share communication costs with other local authorities through cross-border initiatives should be explored.

It should be remembered that the process of shifting to IER will involve large amounts of direct mail going to individuals and households from July 2014. Confirmation letters will be sent to those people who have been matched and transferred to the IER register. Household Enquiry Forms (HEF) and Invitations to Register (ITR) will be sent to properties and people that have not been successfully matched. All of this will provide opportunities to include additional leaflets and messages.

Members were concerned about the clarity and accessibility of IER literature and application forms so they are not a barrier to some sections of the community. However, documentation is still in the process of being developed nationally and has not yet been shared or published.

Given the number of staff with frontline roles dealing with residents enquiries i.e. one stop shop and call centre staff, there will be opportunities to inform residents about IER on the back of contact for other matters. As part of its preparations, the Council has allocated a lead trainer to deliver a programme of briefings and trainings to ensure that frontline staff have a good understanding of IER in order to answer enquiries and promote registration.

Panel Members also acknowledged the role that all Council Members will have in terms of communicating the changes and encouraging constituents to take action if they have not been automatically matched and transferred to the new IER register. It was also recognised that Members have local knowledge and would have ideas about how best to engage and communicate with certain communities. Panel Members were keen to highlight the need for on-going briefing of all Elected Members and for good ideas for engaging with constituents to be shared.

Recommendation 2: The Head of Legal and Member Services to coordinate periodic briefings with all Members as a means of maintaining two-way communication to support the implementation of IER.

Recommendation 3: Chairs of constituency committees are requested to include IER as a topic for discussion as part of their forward planning in the New Year.

5.4 Initial costs estimates for implementing IER in 2014

The Panel was advised that in line with Cabinet Office's commitment to supporting the costs of implementing IER, allocations are being awarded to Council's in 2012/13, 2013/14 and 2014/15. These have been based on a formula including population size and the results of the CDR exercise. Wirral's allocation for 2012/13 has been £12,086. In terms of the allocation for 2013/14, the Council had just been informed that this would be £100,403. This figure was calculated using the results of the CDR exercise to determine the volume of correspondence and activity to address the non-matches to the IER register.

An initial forecast of the costs for 2014/15 has been developed based on the CDR and local data-matching results and a series of assumptions about the likely response rates to mail shots and canvassing activity. This figure was calculated at £240,518. The cost for delivering the annual canvas in 2012 was £187,534. Therefore, the allocation of £100,403 is considered to be sufficient with a satisfactory surplus of £47,000 to cover the cost of communications and engagement activity as well as any other potential resilience and/or contingency costs.

It was explained to the Panel that this forecast was an initial assessment, although it did err on the side of caution had been based on detailed work and assumptions. The assessment will be reviewed over the coming months as more details emerge from the Cabinet Office to ensure there is sufficient resource in place. The Panel was also advised that in advance of the announcement of the 2014/15 allocation and to mitigate the risk of insufficient resources to cover the costs of IER, the Head of Legal and Member Services had included some contingency in the Elections Team budget for 2014/15.

A further allocation from Cabinet Office is anticipated in 2014/15. However, this is not known at this time but will be expected to taper given the bulk of the work will be undertaken in the coming financial year.

Recommendation 4: The Head of Legal and Member Services should ensure that funds are used in accordance with Cabinet office requirements/conditions and where possible used to support additional targeted engagement and canvassing activities, using the IER process as a vehicle to maximise electoral registration, and for contingency purposes.

6. CONCLUSION

Overall, the Panel were assured the Council's preparations for IER are in hand. The Panel were also assured that officers have a good understanding of the IER project, including what needs to be done and what the likely problems and issues are likely to be going forward.

The results of the CDR and local data-matching indicate that our position is above average in terms of our readiness to transfer to the IER register, which is very encouraging. Whilst the picture at the Borough-wide level is very positive, Panel Members were concerned that at a local level there are some wards which are a cause for concern in terms of people being transferred to the new register and levels of registration more generally. This highlights the need for engagement and canvassing activities to be effectively targeted and resourced.

In terms of the data analysis, the Panel was impressed with the quality of the information and analysis provided. Members also highlighted this was the first time they had seen this level of analysis of the electorate and that this would be of interest to all Elected Members and residents and should be made publicly available.

Recommendation 5: The Head of Legal and Member Service to make Ward data on IER and non-registered eligible voters available to all Elected Members and via the Council's website.

The Panel highlighted the need for a corporate approach to IER with front-line staff being effectively briefed so the message about this change is widely communicated to members of the public. All Members of the Council should also receive regular written and verbal briefings to ensure they are able to provide the latest information to their constituents.

The Panel acknowledged this review had been undertaken early on in the process, and that it would be useful for officers to bring an updated position to the Policy and Performance Committee further down the line and at an appropriate point i.e. June/July 2014.

Recommendation 6: The Head of Legal and Members Services should prepare a report to the Policy and Performance Committee providing an update on preparations for IER closer to the launch in June 2014.

Finally, the Panel were keen to consider that once the IER register is published in December 2014, there would be a need consider how the on-going register is effectively maintained. This will be particularly important beyond the 2015 general election after which old records will be deleted and the register is mostly likely to experience a reduction.

7. MEMBERS OF THE REVIEW PANEL

Chair's Statement:

The review provided a good opportunity for Members of the Coordinating Committee to understand the changes coming in next year. The Panel were impressed with the level of preparation already undertaken by Council Officers and are confident Wirral's transfer to the new register should go well in 2014. This is an issue that all Members need to be aware of so that they can answer questions from constituents as the transfer to IER draws nearer.

It is clear over 90% of people will be automatically transferred to the new register. Whilst the overall picture for Wirral is positive, the Panel is concerned that in areas with higher levels of deprivation and people living in rented accommodation, the transfer to IER will require significantly more work. This review also shows that these areas also have more people that do not registered to vote. This emphasises the need for the Council to take a targeted approach with the additional resources available.

Whilst the accuracy of Wirral's electoral register has traditionally been above the national average, the IER process provides us with a unique opportunity to encourage those not on the register, particularly young people, to get themselves registered so they can vote at future elections.

Panel Membership

Councillor Jean Stapleton (Chair)



Councillor Moira McLaughlin



Councillor Denise Roberts



Councillor Steve Williams



This Report was produced by the IER Scrutiny Review Panel
(which reports to the Policy & Performance Coordinating Committee)

Appendix 1:

Scope Document

Date: 14th October 2013

Review Title: Individual Electoral Registration

Scrutiny Panel Chair: Cllr Jean Stapleton (Chair), 0151 201 5057, jeanstapleton@wirral.gov.uk
Panel members: Cllr Moira McLaughlin, 0151 644 8234, moiramclaughlin@wirral.gov.uk Cllr Denise Roberts, 0151 652 3309, deniseroberts@wirral.gov.uk Cllr Steve Williams, 0151 677 8848, stevewilliams@wirral.gov.uk
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Other Key Officer contacts: Gareth Latham (Research and Information Officer), 0151 691 8030, garethlatham@wirral.gov.uk
2. What are the main issues? <ul style="list-style-type: none">• Wirral's progress in terms of IER preparation has been good in terms of implementing a new electoral management system, the results of the test data match with DWP and local data matching.• Members of the Panel were concerned about the introduction of IER having a negative impact on voter registration.• There are concerns about low registration among certain communities both geographically and in terms of specific sections of the community, particularly young people and people living in rented accommodation.• At a time of austerity, there was concern about the cost of implementing IER and whether this can be met from existing resources assisted by modest allocations from the Cabinet Office.• The government's increasingly strict stance on ICT security presents a risk to the implementation of on line registration.
3. The Committee's overall aim/objective in doing this work is: <ul style="list-style-type: none">• For the Panel to be satisfied there are robust arrangements in place for the implementation of IER.• To have a good understanding of the potential issues and problems in implementing this new system.• That Wirral is not financially disadvantaged by implementing IER.• That all opportunities are taken to use IER as a vehicle to maximise registration.

4. The possible outputs/outcomes are: <ol style="list-style-type: none"> 1. Wirral benefits from a smooth transition to IER. 2. That voter registration levels are not adversely affected by the shift to IER 	
5. What specific value can scrutiny add to this topic? <ol style="list-style-type: none"> 1. Scrutiny can provide assurance to the Council that preparations for the shift to IER and the implementation of this new approach are being effectively managed. 2. Scrutiny can support effective communications to Members regarding the implementation of IER and the issues Members need to be aware of. 3. Scrutiny can provide support in helping to promote electoral registration. 	
6. Who will the Committee be trying to influence as part of its work? <ul style="list-style-type: none"> • Elected Member • The General Public • Specific groups that might be able to support the Council's engagement strategy 	
7. Duration of enquiry? <p>This is considered to be a short review to assess the Council's readiness for implementation. It has been suggested that a further review of implementation is scheduled at a suitable milestone in the implementation plan.</p>	
8. What category does the review fall into? <p>Horizon scanning – this review is intended to inform and add value to the local implementation of a nationally delivered government policy.</p>	
9. Extra resources needed? Would the investigation benefit from the co-operation of an expert witness? <p>None identified at this stage.</p>	
10. What information do we need?	
10.1 Secondary information (background information, existing reports, legislation, central government documents, etc). <ul style="list-style-type: none"> • Project plans & briefing papers distributed by Cabinet Office • Results of national pilot • Local census data to understand local population profiles. 	10.2 Primary/new evidence/information <ul style="list-style-type: none"> • Analysis of dry run data match results against local population profiles • The Council's Strategy for targeted engagement to address under-registration amongst specific communities.
10.3 Who can provide us with further relevant evidence? (Cabinet portfolio holder, officer, service user, general public, expert witness, etc). council officers to include: <ul style="list-style-type: none"> • The Head of Legal & Member Services 	10.4 What specific areas do we want them to cover when they give evidence? <ul style="list-style-type: none"> • Officers to provide a more detailed analysis of those communities (geographical and

<ul style="list-style-type: none"> Officers from Electoral Services and the Policy Unit. 	<p>thematic) were registration is lower.</p> <ul style="list-style-type: none"> Officers to set out the proposed strategy for maximising engagement and registration (with particular reference to those communities). Officers to provide a budget forecast of the financial impact of IER and whether this can be achieved from within existing resources assisted by the additional allocations from Cabinet Office for 2013/14, 2014/15, 2015/16.
<p>11. What processes can we use to feed into the review? (site visits/observations, face-to-face questioning, telephone survey, written questionnaire, etc).</p> <p>None identified at this stage.</p>	
<p>12. In what ways can we involve the public and at what stages? (consider whole range of consultative mechanisms, local committees and local ward mechanisms).</p> <p>None identified at this stage.</p>	