

Co-ordinated Online Record of Electors (CORE)

Response to Consultation CP(R) 29/05
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**Summary of responses to consultation carried out by the Department for
Constitutional Affairs. This information is also available on the DCA website at
www.dca.gov.uk**

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Executive Summary

This paper sets out the outcome of the public consultation process for the second phase of the Co-ordinated Online Record of Electors (CORE) project. The formal consultation period took place between December 2005 and March 2006. An additional informal user consultation process took place in September 2006.

It should be noted that a number of the consultation questions are no longer relevant under current legislation, as the consultation paper was written before the Electoral Administration Act 2006 was passed. The secondary CORE legislation, the CORE Order, will only cover what can be delivered within current legislative constraints. This means that not everything proposed in the consultation paper will be possible. Nevertheless, this response paper includes all the consultation questions, and responses to these.

The project will develop a single source of electoral registration data for authorised national users and will, in parallel, examine the extent of low-quality electoral data and seek solutions to address this problem.

The CORE information system is part of the Government's long-term strategy to strengthen the integrity of electoral registers and will provide a crucial first step in systematically detecting potential instances of electoral fraud, although initially this will be limited to absent voter fraud.

CORE's predecessor was LASER, the Local Authorities Secure Electoral Register, a project initiated in 2001 to support the then recent introduction of rolling registration and a new obligation for political parties to verify that donors to political parties were registered on an electoral register (under the Political Parties, Elections and Referendums Act (PPERA) 2000). LASER was to be a partnership between central government, the Improvement and Development Agency (IDeA), the Local Government Association (LGA) and the Electoral Commission, and was to cleanse, standardise and provide national access to electoral registration data.

However, a subsequent legal judgement¹ limited the sale of the full electoral register on a broader commercial basis. This undermined the business case for LASER and so CORE was initiated in late 2003 to meet the needs of political parties and other users of electoral registration information.

The Office of the Deputy Prime Minister (ODPM) developed a business case for CORE, which would “...provide a solution to the various requirements placed on electoral registers and local authorities. It aims to improve the quality of electoral registers and ensure that accurate and timely registration will support the needs of the electorate and authorised users. It will also help facilitate other initiatives including e-voting.” ODPM argued that “the CORE project is an integral part of the ongoing Electoral Modernisation Programme which aims to modernise the election process as a way of helping to revitalise democracy and re-engage citizens.”

Since then, work has continued towards the completion of the first phase of the overall CORE project – supporting inhouse system providers and third party vendors in augmenting their electoral registration systems to output electoral registration data in an agreed format standard – Election Markup Language (EML) format standard. Standardisation of data output in EML is a necessary precursor to support a future CORE information system.

This consultation process has revealed a multitude of expectations about what the CORE project would, and should be, delivering. This paper addresses those expectations and presents a clear vision for the future of the CORE project, how it will operate, and of the functionality that the CORE information system would support.

In this context, it is important to note that the existing legislative framework clearly places primary responsibility for information contained in the electoral registers with local registration officers. This includes determining whether an individual is entitled to vote, and the quality of the data that is included on the registers. This will not change with the introduction of CORE.

¹ *R (Robertson) v City of Wakefield Metropolitan District Council* [2002] 2WLR 889; *R(Robertson) v Secretary of State and Experian and Equifax Limited* [2003] EWHC 1760 (Admin)

Rather, the design for the CORE information system and service will recognise that the electoral registration process continues to be ‘owned’ and managed by local registration officers. The CORE information system will support, rather than replace, the role of registration officers in maintaining their respective local electoral registers, monthly alteration notices, list of overseas electors and absent voter records.

Specifically, the CORE information system will support registration officers by cross-matching data across local authority boundaries to detect potential instances of electoral fraud or any other anomalies that may otherwise not be detected on a national scale. Initially, the CORE keeper will cross-match information on absent voter records to check for postal or proxy voter fraud, but if future legislation were introduced to provide for the allocation of unique identifiers as part of the electoral registration process, the CORE keeper would be able to detect a wider range of potential fraud as well as duplicate registrations². It should be noted that allocating unique identifiers does not necessarily involve moving to a system of individual registration. Rather, it would mean that electors would be allocated a national elector number which they would retain irrespective of which household they are registered in.

The CORE project does not seek to modify existing restrictions, as set out in the Representation of the People Act 1983, on who is permitted to access what electoral registration information. Nor does the project seek to modify the fees that users are charged for access to this information.

A large number of respondents commented on policy issues that were outside the scope of the consultation. The first issue was of the quality and completeness of information held on the local registers and provided to users of electoral registration data. This is referred to as ‘data quality’ and was originally outside the scope of the CORE project. However, in order to ensure that this issue was understood, DCA conducted an investigation into data quality issues as part of this consultation process.

² Note that being registered at more than one address in itself is not an offence – there are circumstances under which an individual is permitted to be registered at more than one address.

While the first phase of CORE will implement the Election Markup Language (EML) which will standardise how electoral registration data is made available to users, the CORE information system will not ‘cleanse’ data currently held in local electoral registers. This would require other interventions, which will be examined as part of the CORE project and by DCA in relation to registration in general. The scope of the CORE project has therefore been widened to include addressing data quality concerns. This paper takes into account discussions held with users of electoral registration data about data quality. The results of these discussions are detailed in Annex B.

A second policy concern reported by respondents relates to the frequency with which the electoral register is updated. While an individual may apply to be added to the register at any time, the actual register of electors is only updated on a monthly basis, as defined by the Representation of the People Act 1983 (as amended). A number of respondents hinted that more frequent updating of electoral registers would be desirable. These comments will be given broader consideration in setting the future direction of electoral registration policy.

The next step for the CORE project is a feasibility study which will run between December 2006 and March 2007 and will examine how to implement the CORE information system in light of data quality concerns. This paper, and the feasibility study, will form the basis on which the CORE information system and services will be designed.

Key stakeholders will be consulted during the development of the CORE secondary legislation, which will be laid before Parliament in 2007. In addition, a User Group consisting of key stakeholders has been established to discuss business requirements for CORE, and other CORE-related issues, including data quality. This will initially be chaired by the Electoral Commission until a CORE keeper is appointed.

Finally, the continued assistance and input being provided by stakeholders to assist the DCA to bring the CORE project to fruition is greatly appreciated.

Introduction

The Electoral Administration Act 2006³ makes provision for the establishment of one or more Co-ordinated Online Record of Electors (CORE) schemes. The scheme may be established by an order made by the Secretary of State.

The CORE project has two primary objectives. The first is to provide a single source of electoral registration information for the organisations and individuals permitted to access it by the Representation of the People Act 1983 (as amended) and the Representation of the People (England and Wales) Regulations 2001, 2002 and 2006. This single source will assist political parties to meet their obligations under the Political Parties, Elections and Referendums Act 2000, as well as allowing for systematic detection of potential instances of electoral fraud across registration area boundaries (this will initially be limited to absent voter fraud). The second objective is to examine the extent of problems associated with poor data quality issues and to improve the quality of the information across the UK. Readers should note that data quality was included after the consultation process began and that stakeholder comments were subsequently sought.

In addition to providing a single source of electoral registration information, the CORE project has greater strategic importance, as in the longer term it will also provide an improved means to:

1. strengthen the integrity of electoral registers through detecting potential duplicate registrations, i.e. where an individual is registered at two different addresses, through cross-matching of data; and
2. support the Government's other electoral modernisation initiatives, by delivery of better quality electoral registration data that supports the needs of the electorate and authorised users. This will support future electoral modernisation initiatives including multi-channel elections and e-voting.

Both of these would require further legislative change, but they demonstrate the potential of the CORE project to deliver future benefits in the longer term.

Under the current legislative framework, this is what the CORE information system will and will not be able to do:

³ <http://www.opsi.gov.uk/acts/acts2006/20060022.htm>

1. It will mirror information kept on local electoral registers and will not replace these registers. It will be a record, not a register.
2. It will assist political parties to check that the donations they receive are from a registered elector.
3. It will reduce administrative burden on users, as they will be able to obtain the information from one source rather than over 450.
4. It will be able to cross-match absent voter records to identify potential instances of postal or proxy voter fraud.
5. It will not be able to cross-match data to identify duplicate registrations. (This would require future legislative change, e.g. the allocation of unique identifiers to every elector).
6. It will not be able to make changes to or 'cleanse' the information it holds, as it will be subject to data protection laws preventing this.
7. It will not allow individual electors to check their own registration details.

However, the CORE information system will be designed to be flexible enough to be able to adapt to legislation and policy changes in future.

The CORE project is supported by recent recommendations made by both the Electoral Commission and the Organisation for Security and Cooperation in Europe's Office for Democratic Institutions and Human Rights.

The Electoral Commission's May 2003 report entitled *The electoral registration process*, argued that "*electoral registers should continue to be compiled and managed locally, but should form part of a national register.*"⁴

The Office for Democratic Institutions and Human Rights' 2005 report on the UK's general election of 2005 stated that "*a state-wide database for registered voters could be a useful tool to identify or prevent possible multiple registrations.*"⁵

To inform the development of the CORE information system and associated services, a consultation paper, '*The Co-ordinated Online Record of Electors (CORE) - The implementation of national access arrangements*' (CP 29/05), was published by the DCA on 14 December 2005 and invited comments from interested parties on a range of issues associated with the scope of the CORE scheme.

⁴ <http://www.electoralcommission.org.uk/templates/search/document.cfm/7973> (pages 19-20)

⁵ http://www.osce.org/documents/odihr/2005/08/15921_en.pdf (page 5)

The CORE information system is to provide a single source of electoral registration information to authorised users. The consultation paper sought specific comments on how the service might operate in the current legislative environment as well as potential future functions that could be considered. These included:

1. the proposed model through which national access is to be provided under CORE;
2. the proposed designation of the Electoral Commission as CORE keeper;
3. the type of information to be provided to the CORE keeper by registration officers, and the frequency with which such information is to be provided;
4. whether the CORE keeper should be subject to different legislative obligations than those that currently apply to registration officers;
5. the role of the CORE keeper in providing direct access to an individual's own electoral registration details, and supporting the updating of that information by the individual;
6. the sort of integrity checking that should be performed by the CORE keeper, how any apparent anomalies should be relayed to registration officers and their obligations to act on the CORE keeper's notices;
7. the manner in which the CORE scheme should be implemented; and
8. future options for establishing linkages between the CORE scheme and other datasets to further assist in enhancing the integrity of electoral registers.

The consultation period closed on 7 March 2006, and a total of 118 responses were received from a wide variety of stakeholders including local government authorities, registration officers, political parties, credit reference agencies, commercial suppliers of electoral register systems, and a number of other public and private organisations throughout the UK, as well as several individuals with an interest in electoral administration.

The consultation process was conducted in line with the Code of Practice on Consultation issued by the Cabinet Office, with the Code's six consultation criteria being to:

1. consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.

2. be clear about what the proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. ensure that the consultation is clear, concise and widely accessible.
4. give feedback regarding the responses received and how the consultation process influenced the policy.
5. monitor the department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. ensure the consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

The following chapter draws on the consultation responses to detail the DCA's plans for the CORE scheme and the manner in which it is intended to operate.

This response paper outlines in detail each question on which the consultation paper sought comments, including a brief summary of the rationale behind the position adopted in the consultation paper. The number of responses received in relation to each question, and the extent to which respondents agreed or disagreed is then summarised. A sample of the broad nature of the comments made by respondents is provided, particularly where respondents did not agree with the position adopted in the consultation paper.

Annex A provides a list of the consultation questions, and Annex B provides a list of all respondents to the consultation process.

Finally, DCA recognises the period of time that has elapsed between the initial consultation closing and publication of this report. This time has been used to sufficiently understand and seek ways to address the concerns related to data quality issues that were raised in consultation responses. Annex C summarises the results of separate consultations with users of electoral registration data, including an End User Roundtable which was jointly held by DCA and the Electoral Commission in September 2006.

This paper considers responses to both the initial consultation questions and users' concerns about data quality in order to better address the full range of issues raised by stakeholders during the formal consultation period, December 2005 to March 2006.

Details of how CORE is intended to operate

This section provides an overview of the vision for the CORE project, and the services that the CORE keeper will operate. This includes details of how the information system will work and some of the responsibilities that the CORE keeper, and in turn electoral registration officers, will have. It has been informed by feedback provided by respondents to the consultation process, which is discussed in more detail in the following chapter.

CORE can be considered in terms of three components:

1. **The CORE project** which oversees the development of the information system, services and improvements to the quality of information held on electoral registers;
2. **The CORE information system** which provides a single source of national electoral data; and
3. **The CORE services** which will be delivered by the CORE keeper. This includes granting access to the information system, collecting and distributing fees and providing information to electoral registration officers on any potential instances of fraud that are detected by the information system.

CORE overview

The primary deliverable of the project is the CORE information system which will provide a single source of national electoral data for authorised individual and organisational users who may routinely request this information from multiple registration officers. It will also support other authorised users not currently requesting this data due to the difficulty of obtaining it from over 450 local authorities to begin doing so.

The suite of services delivered by CORE will be designed to supplement and support the role of local registration officers in maintaining their respective local electoral registers, list of overseas electors and absent voter records. The introduction of the services is not intended to reduce or replace the role of electoral registration officers.

The CORE information system and the CORE keeper will also assist in strengthening the integrity of electoral registers. Specifically, the CORE information system will support registration officers by cross-matching of data across registration area boundaries to detect potential anomalies that could not otherwise be detected. The CORE information system will automatically detect circumstances where potential fraud may exist, for example where an individual acts as a proxy for more than two electors, or a particular household receives multiple postal vote redirections. When this occurs, the CORE keeper will notify electoral registration officers who will then be responsible for investigating these referrals and reporting back to the keeper.

How CORE will operate

The CORE information system will provide a single source of electoral registration information for individuals and organisations that are permitted to obtain this information by virtue of the relevant legislation⁶. Registration officers will only be able to access their own information in the CORE dataset. As mentioned above, however, they will receive new notifications from the CORE keeper of potential instances of fraud that may be occurring within their local area.

The CORE information system will provide authorised users with the full national dataset in the form of electronic data files, and in at least Election Markup Language (EML) format. Local authorities will provide the CORE keeper with updated EML files on a monthly basis in line with published versions of the registers, issued monthly alteration notices and lists of overseas electors, and to reflect records of absent voters held by registration officers.

Developing direct online access to the CORE dataset will be considered in the 2006/07 feasibility study. This could bring additional user charges and so will be subject to demand and to meeting value-for-money criteria.

⁶ The 'relevant legislation' refers to the Representation of the People Act 1983, amendments to that Act, and associated regulations.

Although the CORE services will be subject to the Data Protection Act 1998 and support relevant data protection principles⁷, electors will not have direct access to the information system to check their individual registration details. Electors will continue to have the right to inspect their local electoral register, which the CORE dataset mirrors, at each local registration officer's office, the British, Scottish or Welsh Libraries, or other specified local venues.

The services offered by the CORE keeper may include a service to enable individual electors to check their registration status directly against CORE. This may occur through a dedicated telephone hotline, requiring the individual to confirm their name and address. The CORE keeper would then either confirm that the individual was registered at that address, or, if not, advise the individual how to apply to change their details or send them a registration form to be added to the register.

The Electoral Administration Act requires the CORE keeper to inform an ERO if more than a specified number of postal votes have been requested for the same redirection address, or if an individual acts as proxy for more than two electors. The CORE secondary legislation will require the CORE keeper to cross-match information held on consolidated records of absent voters to determine whether the above circumstances have arisen in relation to electors on electoral registers held in two or more different local authority areas. For the purposes of the scheme, the specified number of postal votes will be set at six.

⁷ The relevant data protection principles include that personal data:

- (No. 3) shall be adequate and relevant to the purposes for which they are processed.
- (No. 4) shall be accurate and kept up to date.
- (No. 5) shall not be kept for longer than necessary for the stated purposes.
- (No. 6) shall be processed in accordance with the rights of data subjects (e.g. including the right to prevent processing for the purposes of direct marketing).
- (No. 7) shall be safeguarded against misuse and loss.

An example of when the CORE keeper would need to report back to the relevant EROs would be if an address in one local authority area had received multiple postal votes from three different local authorities. Similarly, the CORE system would identify instances of an individual being appointed to act as proxy for more than two electors registered in different local authorities. These kinds of situation are unlikely to be noted under the current system where there is no way of cross-matching data between electoral registers. Registration officers will retain sole responsibility for scrutinising instances of multiple postal votes from electors redirected within the same local authority area, or of individuals appointed as proxy for more than two electors registered in the same local authority area.

If future legislation will require unique identifiers to be allocated, the CORE keeper would also be required to cross-match registered electors to determine whether a person is registered in respect of more than one address. If the CORE keeper identified that such circumstances had arisen, the CORE keeper would be required to notify the relevant registration officers. The registration officer would then be required to respond to this notification within 20 working days.

Potential future developments

It is anticipated that ongoing management of CORE following Phase 2 will sit under the control of the CORE keeper. Therefore any future developments will be undertaken in partnership between the Government and the keeper. Such development will largely be driven by new user requirements, or changes to the prevailing legislative framework.

In order for the full benefits of CORE to be realised, further legislative changes would need to be introduced. For example, allocating a unique identifier to each elector would allow for the capacity of the CORE information system to increase significantly. This could include cross-matching against other databases and detecting duplicate registrations⁸. It should be noted, however, that Parliament did not agree to the introduction of “individual registration” during the passage of the Electoral Administration Act and no further legislation is currently envisaged.

The operation of the CORE information system and services

Secondary legislation (under the Electoral Administration Act 2006) to enable the CORE information system and associated services to operate will be laid before Parliament in 2007. This is dependent on the timing of the appointment of a CORE

⁸ Note that being registered at more than one address in itself is not an offence – there are circumstances under which an individual is permitted to be registered at more than one address.

keeper, and scheduling parliamentary time. The following section outlines the information that will be included in this legislation, known as the *CORE scheme order*.

Application

The CORE scheme order applies to all parliamentary constituencies and local government electoral areas in the United Kingdom [*Section 1(8), Question 30*]⁹.

Commencement

The CORE scheme will commence on a date determined by an order made by the Secretary of State.

The CORE information system

The key features of the CORE information system are based upon the Central Integrity Reporting Repository (Model 4 in the consultation paper), and include:

1. a centralised CORE dataset containing a complete record of relevant electoral registration data;
2. the currency of this record to be maintained through periodic updates provided by registration officers;
3. automatic acceptance of all data provided to CORE by registration officers where it is in the agreed EML format; and
4. a reporting mechanism to generate reports of potential instances of fraud.

Some functionality identified in the Central Integrity Reporting Repository cannot be delivered in the current legislative environment. For example, duplicate registrations cannot be detected effectively without the application of a unique identifier for each elector. The 2006/07 feasibility study will produce a revised model based on the key features identified above.

⁹ In this section, 'section' refers to the relevant section in the Electoral Administration Act 2006 and 'question' refers to the relevant question in the following chapter of the paper.

CORE keeper

The CORE keeper must be a public authority [Section 1(10), Question 31], and the Electoral Commission may be designated as CORE keeper. However, the appointment of a CORE keeper is still to be negotiated [Section 4, Question 31].

The information that registration officers must provide to the CORE keeper

The CORE scheme order will specify that registration officers must provide to the CORE keeper the published register of parliamentary and local government electors, issued alteration notices, list of overseas electors and absent voter records as described by the relevant legislation.[Sections 1(2),1(11)(a), (b), (c) and (d), Questions 2 and 4].

In addition, the CORE keeper may require that a registration officer provide him with any other information that is collected as part of the electoral registration process but is not currently included in the published registers, issued alteration notices, list of overseas electors and/or absent voter records described under the relevant legislation [Section 1(2) and (11), Question 5].

Such other electoral registration information may include but is not to be limited to:

1. date of birth; and/or
2. signature; and/or
3. any other form of personal identification.

The CORE keeper may not require a registration officer to provide him with any electoral registration information that is not included in the registers, alteration notices, list of overseas electors and/or lists of absent voters published under the relevant legislation in relation to an elector who is registered anonymously [Section 1(2), Question 6].

When information is required to be provided to the CORE keeper

An electoral registration officer is to provide the specified electoral registration information to the CORE keeper on the same day that information is required to be published or issued by the relevant legislation (currently on a monthly basis) [Section 1(3), Question 9].

The form in which information is to be provided to the CORE keeper

The CORE keeper may develop ‘communication’ rules that set out how and in what form a registration officer is to provide the specified electoral registration information to the CORE keeper. The CORE keeper must consult registration officers in the development of the ‘communication’ rules [Section 1(3), Questions 7 and 8].

Obligations of the CORE keeper in relation to the data provided to him

The CORE keeper shall cross-match information held on consolidated absent voter records to determine whether more than six postal votes have been requested for the same address, or whether an individual acts as proxy for more than two electors [Section 2(5) and (6), Questions 10, 21 and 22]. This will be done no earlier than two months after publication of the revised registers and list of overseas electors is required under the relevant legislation.

Where the CORE keeper identifies that such circumstances have arisen in relation to electors registered on electoral registers held in two or more different local authority areas, the CORE keeper must notify the relevant registration officers. The registration officers must, within 20 working days, advise the CORE keeper whether, in the registration officer’s opinion, there has been, or may be, a breach of the relevant legislation [Section 2(5), Question 24 and 25].

Access to information held by the CORE keeper

The CORE keeper may only make available to those individuals and organisations entitled to it under the relevant legislation information from the published registers, issued alteration notices, list of overseas electors and absent voter records [Section 2(2) and (3), Question 11, 12 and 16].

The CORE keeper may not make available any information relating to an individual on the electoral register to any user of CORE not permitted to access this information under the relevant legislation [Section 2(2) and (3), Question 11 and 12].

The form in which the CORE keeper may provide access to the information

The CORE keeper may develop ‘communication’ rules that set out how and in what form access to the specified electoral registration information may be made available. The CORE keeper must consult individuals and organisations that are entitled to this information by virtue of the relevant legislation in the development of the ‘communication’ rules [Section 1(3), Questions 7, 8 and 15].

The CORE scheme will not require the CORE keeper to comply with Regulation 43(1) of the 2001 Regulations, requiring a copy of the full record to be made available for supervised personal public inspection [*Question 14*].

It is intended that the CORE scheme order would provide for the ONS to obtain electoral registration information directly from the CORE keeper, rather than from individual registration officers [*Question 28*].

It is intended that the CORE scheme allow the CORE keeper to use the CORE dataset set to undertake statistical analysis to support its statutory functions [*Question 28*].

Provision of access to the information in both the English and Welsh languages will be supported as appropriate.

Retention of the information by the CORE keeper

The CORE keeper will comply with data protection principles established by the Data Protection Act 1998, including the principle that data should not be kept longer than necessary. In determining how long it is appropriate to retain data, he should take into account the functions he is required by the CORE scheme to perform that necessitate the retention of historical data. For example, five years for reporting of donations, fifteen years for overseas electors' entitlement to register.

Application of relevant legislation

Regulations under:

1. section 53(4) of the 1983 Act,
2. paragraphs 10A to 11A of Schedule 2 to that Act, and
3. paragraph 13 of that Schedule, so far as relating to paragraphs 10A to 11A,

relate to a registration officer making available for inspection any registers he is required to maintain under that Act. They do not apply to the CORE keeper nor to any information kept by him in pursuance of a CORE scheme [*Section 2(3), Question 14*].

Payments by authorised individuals or organisations to the CORE keeper

The fees and charges that the CORE keeper may apply for the supply of data from the CORE information system are to be the same as those prescribed by the relevant legislation for the supply of the data by a registration officer [Section 5(1), Question 11 and 12].

Payments by the CORE keeper to a registration officer

When the CORE keeper supplies data from the CORE information system to users, the keeper will pay the variable portion of the fees and charges prescribed by the relevant legislation to the relevant registration officer. Under current legislation this amounts to £1.50 per 1000 electors if the information is in electronic form, or £5.00 per 1000 electors if the information is in printed form. The CORE keeper shall retain the £20.00 administration fee to offset the cost of delivering the services [Section 5(1), Question 11 and 12].

The consultation questions

Q1. Do you agree that Models 4 and 5¹⁰ are best suited to meet the aims and objectives of Phase 2 of the CORE project? If you disagree, please state which model you believe would be a better fit and set out your reasons.

After assessing the functionality, likely acceptability, ease of implementation and risk associated with each of the six basic approaches to building a CORE scheme, the Central Integrity Reporting Repository (Model 4) and Central Registry (Model 5) were identified in the consultation paper as acceptable models. It was argued that each provides a genuinely centralised record of electors, although Model 4 was ultimately preferred (refer also to question 10), as Model 5 removed an element of control from registration officers and was estimated to cost significantly more to implement.

Of the 118 responses received, 95 provided a response in relation to this question. Of these, only four did not agree that Models 4 and 5 were best suited to meet the aims and objectives of Phase 2 of the CORE project.

One respondent, the Scottish National Party (SNP), favoured the Registration Message Broker (Model 1), arguing that “*national access to the register is not a goal in itself, except in so far as it assists the administration of the electoral process and ancillary activities.*”

Aylesbury Vale District Council suggested that Models 4 and 5 would require the introduction of individual registration, as without individual identifiers the ‘integrity engine’ in either would produce vast and totally unmanageable volumes of register entries for investigation by registration officers. (This issue is considered in more detail in relation to responses provided to question 5.)

In contrast, Call Credit preferred the Central System (Model 6), under which one database would be run from a central location, and registration officers would manage ‘their’ segment of the data on the central database through ‘dumb’ terminals that were part of that central system. It suggested that the quality of the data would probably be highest under this approach.

¹⁰ See Annex D for a full description of each proposed model.

The remaining 92 respondents agreed with the question posed, with most expressing a preference for Model 4.

For example, the Electoral Commission referred to its report, *The electoral registration process* published in May 2003, which argued that electoral registration data should continue to be owned and managed at the local level by registration officers. Hence, it agreed that Model 4 was the only option that reflected this position, while delivering the key objectives of the project. The Association of Electoral Administrators (AEA) supported the adoption of Model 4 for similar reasons.

The Electoral Commission also commented that, *“while Model 5 might...appear attractive in terms of guaranteed application of integrity rules, we are concerned that a significant degree of local control and responsibility for electoral registers would be removed from EROs. We would also question the capacity of a central CORE keeper to make effective and robust decisions about local registration applications.”*

Discussion

As noted, a key objective for the CORE scheme is to provide a single source of electoral registration information to organisations and individuals that are permitted access to it by virtue of existing legislation.

The only model that achieves this, while recognising that registration officers are ultimately responsible for determining whether an individual is entitled to be included on the register and for the data on an electoral register, is Model 4 – the Central Integrity Reporting Repository.

At the same time, feedback from users of electoral registration data, particularly political parties, also revealed a desire for the CORE project to address the underlying quality of data included in these registers. The issue of data quality was further investigated as part of an additional consultation with users of electoral registration information (for details, see Annex C).

While CORE will support moves to improve data quality to some extent by introducing a consistent and standardised EML output file format (refer also to question 7), under the existing legislative framework, ownership of the electoral register and the data it contains resides with local registration officers. Any direct improvements to data quality will need to be made at this level.

Although Models 5 and 6 would provide a more effective means through which to improve the underlying quality of data contained in electoral registers, it is inconsistent with the existing legislative structure. This is because it may result in data provided by registration officers being rejected, and hence neither is considered appropriate.

Consequently, it is intended that the CORE scheme be based on a system design similar to the Central Integrity Reporting Repository (Model 4).

CORE scheme

The CORE scheme is to be based on a system design similar to the Central Integrity Reporting Repository (Model 4), which will involve:

1. a centralised CORE dataset containing a complete record of relevant electoral registration data;
2. the currency of this record to be maintained through periodic updates provided by registration officers;
3. automatic acceptance of all data provided to CORE by registration officers where it is in the agreed EML format;
4. an ‘integrity engine’ within CORE to check data against specified rules, with the objective of identifying possible fraud; and
5. a reporting mechanism to generate reports of potential anomalies.

Q2. Do you agree that all information that currently appears on the full register of electors should be held in CORE? If you disagree, please state which information from the full register you believe should NOT be held in CORE, and set out your reasons.

The consultation paper proposed that all information that appears in the full register of electors be provided by registration officers to the CORE keeper. However, it was acknowledged that, unless a user was entitled to obtain a copy of the full register, CORE would need to filter out those electors who had indicated their wish to ‘opt-out’, i.e. to have their details removed from the edited register.

Of the 118 responses received, 95 provided a response in relation to this question. Of these, only two disagreed with CORE holding all the information that currently appears in the full register of electors.

Consistent with its response to the previous question, the SNP indicated that it did not support the retention of data in a central CORE data repository. Although the details of anonymous electors do not appear on the full electoral register, Salford City Council stated such records should be held locally, as they usually involved personal safety issues (refer also to question 6).

The AEA agreed that CORE should hold all information that currently appears in the full register of electors. However, it noted that *“it is essential...that any information currently held by EROs that is not subject to publication rules and is held by EROs continues to have secure suppression mechanisms. Without doubt the principal concern of EROs is the security of data.”*

The Electoral Commission expressed similar views, but agreed that CORE should hold the name and address details for all registered electors, together with their elector number, and information that identifies all relevant electoral areas, including for example the relevant parliamentary constituency, local authority ward and polling district.

The Commission also recommended that the CORE system be designed to capture historical electoral registration data. It noted that both it and political parties required access to previous versions of the full electoral register for periods of up to five years to support effective compliance with the Political Parties, Elections and Referendum Act 2000.

Discussion

As noted earlier, a key objective for the CORE scheme is to provide a single source of electoral registration information. For this reason, CORE must hold at least the same information as provided as part of the full electoral register.

A consistent concern noted by respondents in response to this and other questions in the consultation paper related to the precise nature of information that might be made available under a CORE scheme.

In this context, it should be noted that CORE is not intended to provide any information in relation to an elector over and above that which may currently be provided by registration officers to the organisation and individual authorised to receive copies of the electoral register or associated notices by virtue of the Representation of the People Act 1983 (as amended) and the Representation of the People (England and Wales) Regulations 2001, 2002 and 2006.

Additional information might be collected as part of the registration process but not be included on the full electoral register (including, for example, personal identifiers and opt-out markers). Where such information were to be provided to the CORE keeper, it would not be available to organisations or individuals outside of the CORE keeper.

As a result, it is intended that the CORE scheme would require registration officers to provide to the CORE keeper all information that currently appears on the full register of electors.

CORE scheme

The specified information that registration officers are to provide to the CORE keeper is all information in relation to the published electoral registers, issued alteration notices, list of overseas voters, and absent voter records maintained by them.

The CORE keeper must ensure that CORE reflects the most recent information provided by a registration officer.

The CORE keeper may choose to retain copies of information provided by a registration officer for a period of time deemed appropriate by the CORE keeper, provided this is consistent with any obligations imposed by the Data Protection Act 1998.

Q3. If responsibility for retention of the marked register is in future to be the responsibility of EROs, what is your estimate of the cost of getting such information imported to a consolidated CORE system? Do you think good value for money and benefits to the integrity of the election would result?

Currently, marked registers are generally only kept in hard copy form, i.e. a printout of the register that is marked at the time ballot papers are issued. However, the consultation paper suggested that an electronic version of the marked register could provide an additional integrity check against fraudulent duplicate voting, and therefore sought views from electoral administrators and software suppliers on the likely additional cost to get marked register information into electronic form.

Of the 118 responses received, 89 provided a response in relation to this question.

Of these, most respondents indicated that the cost of converting a marked register into an electronic record was difficult to quantify. Those that did attempt to quantify the cost suggested that manually generating an electronic copy of the marked register would probably cost in the order of several thousand, but potentially up to ten thousand pounds, per election.

Software suppliers indicated that there were a number of ways in which an electronic marked register could be automatically generated, including changing the way in which registers were marked in polling stations. Providing an information system solution to support possible changes in polling station operation could cost upwards of tens of thousands of pounds.

Only the Liberal Democrats considered that the cost of converting the marked register into an electronic record, and holding it in CORE, represented good value for money.

Other respondents considered that it did not represent good value for money, especially when extrapolated across the country. For example, the Electoral Commission commented that *“...in the absence of electronic polling station registers or other automated processes for compiling a marked register, the provision of marked register information to a central CORE system is likely to require a significant ongoing manual data entry exercise involving many thousands of records per local authority following every election.”*

It went on to state that *“in the absence of a robust cost estimate and a clear business case, we suggest that this should not be a priority for phase 2...”*, although *“...the basic design of the CORE system should allow for the addition of this functionality at some future point.”*

Discussion

As noted earlier, the CORE information system will provide a single source of electoral registration information. In the longer term, it may also provide an improved means to strengthen the integrity of electoral registers and detect potential instances of electoral register anomalies through cross-matching of data.

It is not intended at this time that the CORE scheme require returning or registration officers to provide an electronic copy of the marked register to the CORE keeper.

CORE scheme

This has no implications for the CORE scheme at this time.

Q4. Do you agree that information set out in the statutory absent voter lists maintained by EROs should be supplied to a consolidated CORE system? If you disagree, please set out your reasons.

The consultation paper argued that there were likely to be benefits from having information contained on absent voter records consolidated in CORE. For example, it suggested that comparing correspondence addresses from postal voting lists might reveal if an address was receiving multiple postal voting packs, which could indicate an attempt at postal voting fraud.

It also suggested that, as an individual may not act as proxy for more than two electors unless they are immediate family members, a comparison could be made in a consolidated dataset to identify any potential infringement of this rule.

Of the 118 responses received, 92 provided a comment in relation to this question. A total of nine respondents, all registration officers or representative bodies, did not agree that information set out in the statutory absent voter records should be supplied to a consolidated CORE system.

Most disagreed on the basis that they did not believe that supplying absent voter records to CORE would assist in the detection of electoral anomalies or potential instances of fraud.

For example, Brentwood Borough Council argued that “...*the CORE scheme should concern itself with the electoral register only and not associated electoral matters.*” It stated that absent voter information was only of interest to local parties and candidates contesting elections in their area, while the suggestion that it would assist in the detection of fraud was ill conceived.

Similarly, the Scottish Assessors Association (SAA) noted that absent voter records were only used for an election, suggested that such lists were not always up to date, and questioned the value of this information being provided to CORE as the data may never be used.

The Electoral Office for Northern Ireland suggested that “*cases of attempted fraud are invariably detected by EROs through local knowledge. We do not consider that there would be any benefit....in providing statutory absent voter lists to CORE.*”

Nevertheless, the majority of respondents, including the Electoral Commission, considered that there may be some value in the CORE keeper being able to analyse consolidated absent voter information for electoral integrity purposes.

The AEA also suggested that to do so would enhance moves towards improving the integrity of postal voting, and would be helpful in promoting greater regularity in providing absent voter information to political parties, although it cautioned that it was “...essential that the information relating to absent voter lists is only accessible to people and organisations in the electoral process.”

Discussion

As noted previously, a key objective for the CORE scheme is to provide a single source of electoral registration information. In relation to absent voter records, candidates or their election agents can currently obtain this information from the registration officer on request, and it is therefore considered that this information should also be available from CORE. It is acknowledged that the restriction on an individual acting as proxy for more than two electors unless they are immediate family members relates only to a single election. Therefore, it is not necessarily the case that an individual could not be a proxy for more than two electors, provided these are for different elections.

In any event, the Electoral Administration Act 2006 requires that the CORE keeper, in accordance with the scheme, inform a registration officer if he believes that more than a specified number of postal votes have been requested for the same redirection address, and/or if the same individual has acted as proxy for more than two electors. Therefore, the CORE keeper will require access to absent voter records.

The fact that multiple postal voting packs are being directed to an address does not necessarily indicate an attempt at postal voting fraud. However, consolidating this information in CORE would reveal if postal voting packs from more than one different local government areas were being sent to a single address. This detection is currently not possible.

The ability to obtain absent voter records from CORE is consistent with the objective for it to provide a single source of electoral registration information. As there is potential for CORE to assist in strengthening the integrity of such lists it is considered appropriate that the information set out in the statutory absent voter records be supplied to CORE.

CORE scheme

Registration officers are to provide the CORE keeper with all the information they maintain in absent voter records, including for the election and/or period for which a postal or proxy has been appointed.

Q5. Do you agree that any additional personal identifier information on individuals that is gathered during electoral registration should be supplied to a consolidated CORE system? If you disagree, please set out your reasons. Views on what types of personal identifier might be particularly useful and realistic for use in a CORE context would also be welcomed.

The Electoral Administration Bill originally included provisions for piloting the collection of personal identifiers in the registration process, and for this to be rolled out, if appropriate, following successful piloting. Most of these provisions were not retained in the Electoral Administration Act 2006, meaning that personal identifiers will only be collected for absent voters, and not collected generally. The consultation paper proposed that, should personal identifiers be provided as part of the electoral registration process, these would be provided to CORE.

This question was of broad interest to stakeholders, with 92 out of the 118 respondents providing a response to this question. Of these, 11 respondents did not agree that any additional personal identifier information collected during electoral registration should be supplied to CORE.

Halton Borough Council argued that *“personal identifiers supplied to the electoral registration officer for the purpose of preventing and countering possible electoral fraud should under no circumstances be supplied to a consolidated CORE system nor made available to third parties.”* It went on to state that *“such information is for the use of returning officers in satisfying themselves as to the integrity of elections.”*

Similarly, the SAA responded that *“personal identifiers should ideally be known only by the elector and the Electoral system (ERO & RO) otherwise they are inherently insecure.”*

Enfield Council argued that the independence of local registration officers would be affected if CORE held personal identifier information, while it also claimed that *“this proposal could have a serious effect on the ability of registration officers to register all eligible electors in their areas”*...as it would *“...indirectly lead to individuals being more reluctant to register to vote.”* Test Valley Borough Council expressed similar concerns.

The majority of respondents agreed that any additional personal identifier information gathered during electoral registration should be supplied to a consolidated CORE system. For example, the Electoral Commission commented that *“...the storage of personal identification details by the central CORE system would be essential to enable many of the integrity checking functions outlined later...”*, and that although this *“...may not be required in the immediate future, the initial system design should be sufficiently flexible to cope with the possible addition of further identification fields in future.”*

There was broad support for collecting the date of birth and signature of electors in addition to names and addresses, including from the Electoral Commission and AEA. The AEA also suggested that consideration could be given to collecting national insurance numbers and/or passport numbers as part of the registration process. The SAA also stated that *“if personal identifiers are to be held centrally they should be Date of Birth and National Insurance No.”*

In terms of what personal identifiers respondents believed might be particularly useful for use in a CORE context, many respondents questioned the value of a signature. For example, Equifax commented that *“signature scans are not considered to be that effective and links to other identification methods and data such as ID cards, Passports etc should be considered first.”*

However, many respondents commented on the need for secure storage and controlled access to personal identifiers, while most expressed concern that personal identifiers might be passed on to third parties. On the other hand, Experian, a credit reference agency, argued that *“...personal identifier information is a vital part of the fight against fraud and should be held on CORE and [be] available to authorised users of the data.”*

Discussion

As noted in the introduction, a longer term strategic objective for CORE is to assist in strengthening the integrity of electoral registers by providing an improved means to detect potential instances of electoral register anomalies through cross-matching of data.

The Electoral Office for Northern Ireland (EONI) already collects dates of birth and national insurance numbers as part of the electoral registration process in Northern Ireland. However, within England, Wales and Scotland, cross-matching of data can currently only occur by name and address, and is therefore likely to produce a large number of records for ‘investigation’ by registration officers. Therefore, effective achievement of this longer term strategic objective will depend on unique identifiers being collected or allocated as part of the registration process and subsequently being provided to CORE. This would be in addition to those personal identifiers¹¹ that are already to be collected as part of the postal voting process set out in the Electoral Administration Act 2006.

Nevertheless, implementation of the initial CORE scheme will not require the allocation of unique identifiers as part of the electoral registration process. However, to the extent that unique identifiers may in future be collected or allocated as part of the registration process, these should be provided to CORE to facilitate more effective integrity checking across individual electoral registers.

Importantly, and as noted under the discussion to question 2, it is not intended that CORE provide authorised users with any information on an elector over and above that currently provided by registration officers in published registers, issued alteration notices or absent voter records. To the extent that personal or unique identifiers do not form part of the electoral register¹², alteration notices or absent voter records, these will not be provided, or be accessible, to users of CORE.

CORE scheme

In addition to the information contained in the full electoral register and absent voter records, the CORE keeper may require that a registration officer provide him with any other information that is collected as part of the electoral registration process.

Such other information may include but is not to be limited to:

1. the applicant’s date of birth;

¹¹ There is a distinction between unique and personal identifiers. A unique identifier is something specific to an individual to distinguish that individual from someone else, for example a unique number. Personal identifiers such as date of birth are not necessarily unique, as people with the same name may share the same date of birth.

¹² Note that the date of attainment, which is the date that individuals that are aged 16 or 17 at the time of the canvass turn 18 and are therefore entitled to vote, is already included on the electoral register.

2. the applicant's signature; and/or
3. any other form of personal identification relating to the applicant.

The CORE keeper is not to provide authorised users with any information on an individual elector that is not included in the published registers, issued alteration notices, lists of overseas electors, or absent voter records. This includes personal identifiers.

Q6. Do you agree that any future anonymous elector details should be supplied to a consolidated CORE system, subject to the same restrictions on access as apply to the originating ERO? If you disagree, please set out your reasons.

The consultation paper suggested that the name and address details of electors that had registered anonymously would be provided to CORE. It argued that if this were not the case, an individual registered as an anonymous elector would be able to avoid integrity checking. However, the consultation paper recognised that CORE would need to be subject to the same strict rules about restricting access to this personal data as would apply to the original registration officer.

Of the 118 responses received, 92 provided a comment in relation to this question. Of these, 11 respondents felt that future anonymous elector details should not be supplied to a consolidated CORE system, even if this information was subject to the same restrictions on access as apply to the originating registration officer.

For example, the London Branch of the AEA indicated that it believed CORE should only hold information that was published. It argued that, if information on anonymous electors was forwarded to CORE, it might be perceived to invalidate the anonymity of the elector. However, a credit reference agency argued that in its view, and from an anti-fraud perspective, there should not be anonymous registration.

Many respondents held ambivalent views on whether future anonymous elector details should be supplied to a consolidated CORE system. For example, the Electoral Commission stated that it was *"...not persuaded that at this time there is a genuine case for the CORE database to hold information on anonymous registrants, although it may be helpful to revisit this question following the provision of further guidance on the practical operation of anonymous registration policies."*

Similarly, while the AEA agreed in principle, it suggested that “...those seeking to register via an anonymous facility may be dissuaded if they are aware that this information is being transferred to a national database.” A similar view was expressed by the SAA, which argued that “if there are sufficient safeguards in place to control the creation of anonymous electors, there should be no need to complete further integrity checks.” It went on to say that “if required to make [anonymous registration details] available this should be explained to the claimants [respondent’s own emphasis].”

Discussion

DCA’s policy intent is that the name and address of a person registered anonymously will not appear in the published versions of either the full or the edited electoral register.

Anonymous registration is designed to protect vulnerable people in society whose safety may be at risk if their details were to appear on a public register. For example, this method of registration may be taken up by people being harassed or stalked (either by a stranger or a known person, such as a violent ex-partner), witnesses in criminal cases and people connected with cases who could be subject to intimidation. There is evidence that criminals have used the electoral register to trace the addresses of victims and pursued them using this information.

Under the Electoral Administration Act 2006, for a person to be registered anonymously, the registration officer must determine that the person is entitled to be registered and satisfies the ‘safety test’. This occurs if the safety of the person, or another person of the same household, would be at risk if the register contained the name of the applicant or his qualifying address. The Act provides for regulations to be made to define on what basis the registration officer determines whether the safety test has been satisfied.

Consequently, it is considered that adequate safeguards are contained within the Act to minimise the likelihood that the provisions relating to anonymous registration are abused. Hence, and despite only minimal support, it is intended that the details of anonymous electors would not be supplied to a consolidated CORE system.

CORE scheme

On an elector who is registered anonymously the CORE keeper may not require a registration officer to provide him with any electoral registration information that is not included in the published registers, issued alteration notices, list of overseas electors and/or absent voters records under the relevant legislation.

Q7. Do you agree that the Government should make use of EML-compliant software mandatory [for] EROs by the end of 2006 to enable complete UK coverage of CORE Phase 1 electoral registration software standardisation? If you disagree, please set out your reasons.

The adoption of a single data output protocol is fundamental to CORE Phase 2. A mechanism exists under the direction-making power of section 52(1) and (1A) of the Representation of the People Act 1983 to place a duty on registration officers to be able to output in a specified format. The consultation paper suggested that, given the fundamental importance of 100% compliance in this context, mandating the ability to output in EML for every ERO in the UK was considered appropriate.

Of the 118 responses received, 92 provided a comment in relation to this question. Of these, a total of four respondents disagreed.

XPress suggested that *“...the existing phases need a full review before EML is chosen as the standard.”* While Pembrokeshire County Council agreed EML was desirable, *“...mandating its use by the end of 2006 may be too ambitious, as organisations will have to enable and process EML transactions across their networks, and a more extended timetable would seem to be more likely to offer success.”*

Halton Borough Council argued that it would *“...cause significant problems for some software providers and as a direct result local EROs”*, while East Devon District Council was concerned that a secure means of data transmission had not yet been identified.

Of the remaining respondents, users of electoral registration data generally supported ensuring all electoral register systems were EML compliant, although many noted concerns around the quality of the data currently held by local registration officers, particularly in relation to addresses.

For example, the Liberal Democrats supported the mandatory use of EML, but added that *“...procedures and powers need to be in place in order to ensure that data is of a high quality – for example to ensure that different address information is being consistently entered in the correct fields and not merely that the fields are correctly set up...”*

The Scottish Green Party suggested that *“...many of the problems currently faced by political organisations in holding and maintaining electoral data will be removed if there is...standardisation, rendering much of CORE Phase 2 an unnecessary development.”*

The Electoral Commission agreed that the use of EML-compliant software should be made mandatory by the end of 2006, although it noted that *“the value of providing a single source for electoral registration data will be highly dependent on ensuring the highest quality and consistency of data, and ensuring that local authorities are sufficiently resourced to support this.”* The AEA also noted that secure transmission of data was essential.

Following on from these comments and associated discussion, the issue of data quality was further investigated as part of an additional consultation with users of electoral registration information (for details, see Annex C).

Discussion

OASIS, the XML interoperability consortium, formed the Election and Voter Services Technical Committee in the spring of 2001 to develop standards for election and voter services information using XML. The committee's mission includes the development of *“...a standard for the structured interchange of data among hardware, software, and service providers who engage in any aspect of providing election or voter services to public or private organisations...”* EML, the resultant application of XML, has the overall objective to introduce a uniform and reliable way to allow election systems to interact with each other.

Phase 1 of the overall CORE project has seen the DCA fund inhouse system providers and third party vendors to ensure their electoral registration systems can output electoral registration data in an agreed EML format standard. This element of the overall project is a necessary precursor in supporting a future CORE information system.

At the time the consultation paper was originally prepared, it was expected that the vast majority of registration officers would have implemented EML-compliant software by the end of 2005, in line with the timetable that had been established for Phase 1 of the CORE project. The remainder had indicated that they would become EML-compliant during the first half of 2006. This timetable has since been revised due to changes to the EML spec and further quality assurance. Registration officers are now expected to all be EML-compliant by early 2007.

A key point to note is that the ability for electoral registration systems to output in data in the agreed EML format was in addition to, not as a replacement of, existing formats, including CSV.

In May 2006, the CORE EML functional specification was updated to reflect feedback from users and developers. In addition, a more rigorous quality assurance program and revised implementation timetable was developed with the aim of enabling all suppliers to have electoral registration products able to generate robust EML output files by early 2006. However, the live QA process highlighted extensive data quality problems that have necessitated further changes to the functional specification. It is now expected that broad implementation of EML will occur in early 2007.

Given the need to ensure accuracy and consistency, it is intended that the Secretary of State exercise his power under section 52(1) of the 1983 Act to issue an instruction to electoral registration officers, with regard to maintenance of their registers. Such a direction would require the recommendation of the Electoral Commission and would seek to mandate the use of EML output upon request from electoral data users. It is likely to specify minimum data quality standards for broad implementation over the coming years. The exact nature of such a direction is being reviewed in the 2006/07 feasibility study on data quality.

In terms of the CORE scheme, it will need to allow the CORE keeper to develop 'communication' rules, through a consultation process with stakeholders, to govern the transfer of data between registration officers and the keeper. It is expected that these 'communication' rules will initially reflect the revised EML specification implemented in Phase 1 of the CORE project, although this approach provides flexibility to adapt future technology and policy developments.

Issues raised by respondents on the quality of information contained in local electoral registers are discussed in more detail under Question 10 and Annex C.

CORE scheme

The CORE scheme is to provide for the CORE keeper to establish ‘communication’ rules to govern the exchange of data between registration officers and the keeper. Such rules should also govern how and in what form information in CORE may be made available to authorised users.

The CORE scheme order will need to establish a consultation process that governs the establishment of such ‘communication’ rules by the CORE keeper.

Q8. Do you agree that the Government should actively pursue the possibility of using the Government Connect network for CORE data transactions, whilst also – for the time being - exploring the viability of alternative networking approaches? If you disagree, please set out your reasons and what approach to establishing a suitable network you would prefer.

The consultation paper suggested that the Government Connect network might provide a suitable secure infrastructure for transmission of data from local registration officers to the CORE keeper. However, it acknowledged that, as it was a relatively new initiative, there was a question about whether the network will be in place in time for CORE to benefit from it.

Accordingly, whilst the consultation paper proposed actively pursuing the possibility of using the Government Connect network for CORE data transactions, it also recognised that alternative options should be explored.

Of the 118 responses received, 92 provided a comment in relation to this question. Of these, none disagreed directly with the question.

However, a number of users of electoral registration data expressed concern that the implementation of CORE might be reliant on other government information technology projects being implemented on time, which, it was argued by the Scottish Green Party, “...has not recently been a good assumption.”

Other users were unsure whether the Government Connect network would be required only for transfer of data between registration officers and the centralised CORE dataset, or by users of electoral registration data. The AEA agreed that the Government should actively pursue the possibility of using the Government Connect network for CORE data transactions, provided it "...is considered to be and indeed proven to be the most secure method."

However, the Electoral Commission suggested that other secure mechanisms should be explored alongside the Government Connect programme, noting that *"...it will be necessary to develop a clear specification for the CORE system and the necessary communications mechanisms before any final decision is taken."* It suggested that this *"...should include the criteria required for the network to handle its data transactions, such as cost, geographical coverage, resilience, security and speed."*

Discussion

It is understood that most, if not all, registration officers currently provide electronic versions, often via email, of published registers, issued alteration notices and absent voter records to those authorised to receive them. The legislative framework does not currently provide guidance on the level of security that should apply to the transfer of such data, but it is understood that in some cases data files are password protected (often to the frustration of users).

Although supply of registration data to authorised users by registration officers themselves is outside the scope of the CORE project, the two should ideally be aligned as far as practicable.

Nevertheless, in developing the requirements for a CORE information system, consideration will be given to the required data security outcomes, leaving potential suppliers and developers free to choose the means through which to achieve the specified outcomes. That said, the Government Connect network will continue to be considered for the transmission of data between registration officers and the CORE keeper. Ultimately, the method by which information will be transferred will depend on a cost-benefit analysis of technical options available.

In the longer term, development of the 'communication' rules referred to in the previous question is expected to incorporate matters relating to data security, including encryption, transport and authorisations.

CORE scheme

As noted in the previous response, the CORE scheme will allow the CORE keeper to establish, following a consultation process, 'communication' rules to govern the exchange of data between registration officers and the keeper. These 'communication' rules will include specifying how data may be transmitted and the required level of security and/or encryption.

Q9. Do you agree that EROs should send updates to a CORE central system on a daily basis? If you disagree, please set out your reasons and what frequency of updating you would prefer to see instead.

Under the Representation of the People Act 1983 (as amended), the electoral register is updated by 1 December in each year following an annual canvass, and then on a monthly basis through alteration notices that reflect rolling registrations. The consultation paper suggested that users of electoral registration data may prefer more frequent updating of a CORE system, reflecting, for example, changes as they are entered by the registration officer, even though such updates might not have legal effect until the monthly update is published.

Of the 118 responses received, 98 provided a comment in relation to this question. Of these, the majority, 58, did not agree that registration officers should send updates to a CORE central system on a daily basis.

Several respondents argued that updates to CORE should, at least initially, be provided only on a monthly basis. For example, the West Midlands AEA supported a phased approach *"...with monthly updates initially then graduating to daily updates if the system could support it and it were automated."* Three suggested that updates should be provided on a weekly basis instead.

Kirklees Metropolitan Borough Council expressed concerns with daily updates as *"EROs have particular checking processes in place at monthly intervals as part of the rolling registration process and supplying daily would mean that data would be transmitted unchecked...[and]...would then be sent to other users...when it may not be correct."*

Enfield Borough Council objected strongly, arguing that “...*legislation requires that the electoral register be updated on a monthly basis outside of the annual canvass period. CORE should therefore mirror the published electoral registers, not introduce a separate registration system at a national level.*” The SAA also disagreed, indicating it “...*would prefer annual provision of the register on 1st December with monthly updates of registration data from January to September.*”

The remaining 40 respondents broadly agreed that registration officers should send updates to a CORE central system on a daily basis, although a number qualified their response.

For example, while the Electoral Commission commented that “...*information relating to rolling registration transactions...could be updated...on a daily basis...[although] under the current legislative framework, alterations to electoral registers are only published on a monthly basis.*” Consequently, the Commission did not “...*see a strong case for requiring EROs to send updated registration information so frequently.*”

Similarly, while the AEA indicated it agreed “...*provided technology [was] in place to enable the process to be run automatically*”, it noted that “...*the objection period and whether the due process within this has been completed will need to be considered.*” However, the AEA did indicate that responses received from its members on this issue were fairly evenly divided on whether the existing monthly arrangements should be retained or that information be provided on a daily basis.

Credit reference agencies generally preferred more frequent updates. For example, Experian noted that “...*EROs should provide updates to CORE as frequently as possible, and at a minimum daily*”, although it also stated that “...*it is essential that updates are passed across as soon as is possible in order to keep the data consistent.*”

Discussion

As noted earlier, a key objective for the CORE scheme is to provide a single source of electoral registration information. In the longer term, it will also provide an improved means to strengthen the integrity of electoral registers and detect potential instances of electoral register anomalies through cross-matching of data.

To effectively achieve its key objective, CORE must mirror information held on local electoral registers, which would otherwise be provided by registration officers to authorised users. This implies that records that are not yet part of the published electoral register, alteration notices or lists, and which does not support cross matching of data, should not form part of the CORE dataset. This includes identifiers and other non-published information.

The consultation into data quality demonstrates that there is a wide variation in business processes between registration officers and that consistent business processes will assist them to better meet their statutory obligations. Given current inconsistencies, there is a strong possibility that providing information to CORE before the register is published could result in an increased number of anomalies, that could have been resolved before the formal publication by the registration officer.

On this basis, it is intended that registration officers provide updates to CORE when such information is published under the applicable legislation. For the register itself, this would mean by 1 December each year, and then monthly update notices from January to September.

Modelling the provision of the data by registration officers to the CORE keeper on the relevant legislative provisions will ensure that frequency of updates to the CORE dataset could reflect, for example, more frequent or continuous registration.

CORE scheme

The CORE scheme will require registration officers to provide information to CORE when they publish their registers, lists or alteration notices under the relevant legislation (currently on a monthly basis).

The 'communication' rules developed to support the transmission of data between registration officers and the CORE keeper, and between the CORE keeper and authorised users, will specify that information is exchanged between the parties on the same day as the register is published under relevant legislation (currently monthly).

Q10. Do you agree that data sent by EROs should go straight into the CORE record, with subsequent integrity checking and reporting of possible anomalies? If you disagree, please set out your reasons.

The consultation paper proposed that Model 4, the Central Integrity Reporting Repository, be adopted for CORE. This would allow correctly formatted EML data to be uploaded straight into the CORE record, with integrity checking and reporting occurring subsequently.

Of the 118 responses received, 94 provided a comment in relation to this question. Of these, six respondents, either users, organisations providing information systems, or individuals with an interest in the elections field, did not agree with this approach.

For example, the Conservatives disagreed, noting the importance that information on CORE was accurate, as inaccuracies could lead to political parties misreporting under the Political Parties, Elections and Referendum Act 2000.

Northgate argued that *“option 4 would allow anomalous and potentially inaccurate data to be stored within CORE pending action (albeit mandatory) by the relevant ERO”* and recommended that *“...integrity rules...be actively enforced by CORE [to]...prevent incorrect data from being entered on to the system.”* However this position is inconsistent with data protection laws which require CORE to mirror exactly the data contained on local registers.

Of those that agreed, most respondents linked their views here with their response to question one. For example, the Electoral Commission commented that *“...any updates sent by local EROs to the CORE system should be accepted immediately as reflecting the official electoral register”*, noting *“...a quarantine procedure would also contravene the overarching principle that local EROs should remain ultimately responsible for the content of electoral registers.”*

Similarly, the AEA indicated that *“CORE and the local electoral registers must be compatible with regard to the data that is contained, published and available to users.”* The SAA concurred, commenting that *“CORE should automatically accept the data (ie. published data).”*

Discussion

As discussed under the previous question, to achieve its key objective of providing a single source of electoral registration information, CORE must effectively mirror the information held on local electoral registers, which by virtue of existing legislation is deemed to be ‘correct’.

As noted previously, users have expressed concerns about the underlying quality of data included in some electoral registers. Significant additional effort is needed to ensure the data can be utilised effectively, for example for party political mailing purposes. The issue of data quality was further investigated as part of an additional consultation with users of electoral registration information (for details, see Annex C).

In responding to the previous question, registration officers have referred to processes for verifying the accuracy of the information on their registers. However, it would appear that more could be done to improve the manner in which information is entered into electoral administration systems.

While it may be argued that the primary purpose of the registers is the conduct of elections, they are also necessary for checking the conduct of political parties, as set out in the Political Parties, Elections and Referendums Act 2000. In order for this to occur effectively, registration officers will need to ensure the accuracy of the data that they enter. This will also assist in the development of CORE and any future modernisation initiatives.

As checking the accuracy of electoral registration data will be the responsibility of the registration officers, it is intended that data provided by registration officers to the CORE keeper will be accepted into the CORE record as a matter of course, with subsequent integrity checking and reporting of potential instances of fraud.

CORE scheme

Consistent with question 1, the CORE scheme is to be based on a system design similar to Model 4, the Central Integrity Reporting Repository, which will involve:

1. automatic acceptance of all data provided to CORE by registration officers where it is in the agreed EML format;
2. an 'integrity engine' within CORE to check data against specified rules, with the objective of identifying possible anomalous records; and
3. a reporting mechanism to generate reports of potentially duplicate entries and other potential elector register anomalies.

Q11. Do you agree that, in areas where a CORE scheme is operational, specified large-scale users of electoral registration data should no longer be able to obtain such data direct from local EROs? If you disagree, please set out your reasons.

The consultation paper suggested that CORE be the source of such information for national users of the entire electoral register, or the edited electoral register, instead of approaching local registration officers for this data.

Of the 118 responses received, 98 provided a comment in relation to this question. Of these, 15, including national users such as the Conservative Party, the Liberal Democrat Party, the Scottish Green Party, and credit reference agencies Experian and Equifax, did not agree that specified large-scale users of electoral registration data should no longer be able to obtain such data direct from local registration officers.

The Conservative Party commented that, given the tight timetable for local government elections, obtaining information directly from the local registration officer might be the fastest and most convenient method for registered political parties. Similar views were expressed by the Liberal Democrats, while the Scottish Green Party found the term 'large-scale user' vague.

Experian argued that *"if CORE is efficient and fulfils the needs of the bulk users, they will naturally go there out of choice"*, but that it *"...would not support any suggestion that we could no longer liaise with local authorities."* This view was supported by Enfield Borough Council. In a similar vein, Equifax expressed concerns that CORE may not deliver electoral register data compatible with its existing business processes.

The AEA agreed that specified large-scale users of electoral registration data should no longer be able to obtain such data direct from local registration officers *"...provided income received by CORE is passed to the appropriate ERO."* However, the AEA did suggest that users be able to obtain information from registration officers in the event of CORE being unavailable.

Similarly, the SAA commented that *"it may be beneficial for national large-scale users to obtain registration data from a central source however the ERO should not be precluded from providing this service and this should be a matter of choice for the user."*

Discussion

The Representation of the People (England and Wales) Regulations 2001 and 2006 provide for the registration officer to:

1. supply a copy of the full register (and list of overseas electors) free of charge to a range of organisations and individuals;
2. sell the full register for a prescribed fee to government departments and credit reference agencies; and
3. supply a copy of the edited register to any person on the payment of a prescribed fee.

These regulations will also apply to the CORE keeper, although the Electoral Administration Act 2006 does make provision for modifications to the application of these regulations as the Secretary of State thinks appropriate. That is, the same or different provisions may apply to access to information held on CORE.

However, it is not the case that the CORE scheme itself will affect the right of an organisation or individual to obtain electoral information from registration officers under the Representation of the People (England and Wales) Regulations 2001 and 2006 – that would require amendments to these Regulations.

CORE will be effective in becoming the preferred source of electoral registration information for large-scale users if it meets the needs of such users. Clearly, if large-scale users continued to approach local registration officers for this information after CORE had been implemented, it would indicate a need to review the operation of the scheme.

In terms of the CORE scheme, it is intended that existing regulatory provisions providing direct access to electoral registers be retained. Further, the effectiveness of the CORE scheme and the desirability of providing future access to specified users (for example, government departments and credit reference agencies under Regulations 113 and 114 of the RPR 2001) through CORE alone should be considered within five years of the CORE scheme coming into operation or as part of a review that will be required before any new scheme order is made.

In terms of charges for access to electoral registration data, the current prescribed fee is £20 plus £1.50 for every 1,000 entries (or remaining part of 1,000 entries) if the data is provided in electronic form, or £20 plus £5.00 for every 1,000 entries (or remaining part of 1,000 entries) if the data is provided in printed form. It should be noted that the prescribed fees are not, and are not intended to be, reflective of the cost of compiling the electoral registers, alteration notices, and list of overseas electors and absent voter records.

Nevertheless, it is proposed that the same prescribed fee structure apply where an authorised individual or organisation obtains electoral registration data from CORE, with the CORE keeper retaining the fixed fee. The variable component should be returned to the registration officer or officers responsible for the local authority area or areas to which the data relates.

CORE scheme

The fees and charges that the CORE keeper may apply for the supply of data from the CORE information system are to be the same as the fees and charges prescribed by the relevant legislation for the supply of the data by a registration officer.

Where the CORE keeper supplies data from the CORE information system, the CORE keeper shall pay the relevant registration officer the variable portion of the fees and charges prescribed by the relevant legislation. This will be £1.50 per 1000 electors in electronic form and £5.00 per 1000 electors in printed form. The CORE keeper shall retain the £20.00 administration fee.

Q12. Do you think that, in areas where a CORE scheme is operational, smaller-scale users of electoral registration data should: a) only be able to obtain copies of the information from CORE; b) have the option to obtain the copies either from their local ERO or CORE; or c) only be able to obtain the copies from the local ERO? Please set out your reasons.

The consultation paper recognised that there are organisations and individuals who are permitted to have access to electoral registration information, but who would be interested only with that information for a specific area, perhaps covered by one or two registration officers. Examples might include local branches of political parties, independent election candidates, and, in relation to the edited register, local businesses.

It was argued that requests from users of such smaller elector register datasets might impose significant demands on the resources of registration officers, which could be avoided if such data were obtained from CORE. In addition, if all requests for electoral registration information were coordinated through CORE, it would promote a consistent approach in interpreting and applying the rules surrounding provision of copies of the register.

Of the 118 responses received, 96 provided a comment in relation to this question.

Of these, six, including Wigan Metropolitan Borough Council and Equifax, suggested that smaller-scale users of electoral registration data should only be able to obtain copies of the information from CORE.

Wigan echoed its comments in relation to the previous question, indicating that this would “...ensure consistent application of the rules governing supply”, while Equifax suggested that “small scale users would be more disruptive to the EROs and should have supplies from the central register.”

A further four respondents favoured smaller-scale users having the option of obtaining electoral registration data either from their local registration officer or CORE. For example, Enfield Borough Council argued that the choice should be left to the user. The Conservative Party referred to their response to the previous question, indicating a need to be able to use the fastest and most convenient method.

The AEA indicated that its members’ position was mixed on this issue, and views were probably determined by local circumstances, resources and arrangements. While it commented that “it would be very much cleaner to have either the option of obtaining information direct from CORE or the ERO rather than a variety of options”, it noted that “...a transitional period of having the data available from the ERO in certain circumstances would be appropriate.”

Five respondents suggested that smaller-scale users of electoral registration data should only be able to obtain the copies from the local registration officers.

For example, South Ayrshire Council pointed out that “registers for community councils and national parks will only be available from the EROs, as these types of electoral area do not respect polling district boundaries, and therefore cannot be held in CORE.” Three Rivers District Council suggested that obtaining electoral registration data from the registration officer would ensure the information was up to date.

Bolton Metropolitan Borough Council also argued that smaller-scale users of electoral registration data should only be able to obtain the copies from the local registration officer, although this was largely as a result of concerns that revenue might be lost.

Discussion

The issues raised by this question are the same as those discussed in relation to the previous question, question 11.

It is intended that existing regulatory provisions providing direct access to electoral registers be retained. The effectiveness of the CORE scheme and the desirability of providing future access for non-election related purposes through CORE alone could be considered within five years of the CORE scheme coming into operation, or as part of a review that will be required before a new scheme order is made.

CORE scheme

This has no implications for the CORE scheme at this time.

Q13. Do you agree with the proposal that returning officers should continue to obtain the register and other information required to conduct the election direct from the relevant EROs, rather than from CORE? If you disagree, please set out your reasons.

The consultation paper recognised that, for the purposes of conducting an election, the relevant electoral register under existing legislation was that held by a local registration officer. For this reason, it did not propose that returning officers obtain the register and other information necessary to conduct an election from CORE.

Of the 118 responses received, 95 provided a comment in relation to this question. Of these, three disagreed and considered that returning officers should obtain the register and other information required to conduct the election direct from CORE.

The Conservatives argued that, provided CORE is accurate, it saw “...no reason why the Returning Officer should not be able to use whichever source is most convenient as the information would be the same.” Walsall Metropolitan Borough Council sited consistency as the reason for preferring that registration officers obtain their electoral registers from CORE, the same as its position for all other users, while Leicestershire County Council argued that returning officers should obtain this information from CORE to reduce the burden on registration officers. It claimed that some districts have difficulty in supplying the required copy of the electoral register to the County Council.

The Electoral Commission was amongst the remaining respondents that agreed that returning officers should continue to obtain the register and other information required to conduct the election direct from the registration officers. The AEA also agreed, noting that *“it is essential that the direct relationship between the [returning officer] and ERO is maintained”*, while the SAA noted that *“...it would be a huge task for the CORE keeper, / or the staff of the contractor providing the CORE system, to deal with all the returning officers involved in running UK-wide elections.”*

Discussion

To some extent, the issues raised by this question are similar to those discussed in relation to questions 11 and 12.

As noted there, the CORE will not affect the right of an organisation or individual to obtain electoral information from local authorities under the Representation of the People (England and Wales) Regulations 2001 and 2006.

Further, the consultation paper argued that information held in the CORE information system may differ from the local register because of changes due to rolling registration. These additional registrations would not be reflected in CORE until the next monthly update. If the elector information needed to run an election was taken from CORE rather than the local ERO, it could potentially disenfranchise electors whose details were in fact recorded on the local register.

In addition, there will already be infrastructure in place locally for conducting elections. Seeking electoral registration information from the CORE information system may add an additional and unnecessary step to this process.

Consequently, it is not intended that the CORE scheme cover the provision of the register and other information required to conduct the election to returning officers. Instead, returning officers should continue to obtain this information direct from the relevant local registration officer.

CORE scheme

This has no implications for the CORE scheme at this time.

Q14. Do you agree with the proposal that a CORE keeper should not be subject to the requirements for making a copy of the full register available for personal public inspection? If you disagree, please set out your reasons.

The Representation of the People (England and Wales) Regulations 2001 requires registration officers to make copies of the published register available for public inspection under supervision in their office and at other places in the registration area. Members of the public in that area are to be allowed reasonable facilities for inspection of the register.

The consultation paper suggested that, as CORE only mirrors the information held on local electoral registers, which are already open to public inspection, and as CORE was intended to simply provide a centralised means to access this information, it was not necessary for CORE to also make a copy of the information available for public inspection under supervision.

Of the 118 responses received, 88 provided a comment in relation to this question. Of these, 22 considered that the CORE keeper should be required to make a copy of the full register available for personal public inspection.

In the main, the views of these 22 respondents reflected comments made by the AEA Southern Branch that *“a CORE keeper should offer the same service to the public that [registration officers] are required to. This would enable electors wishing to inspect registers covering a number of different authorities to inspect registers in the same location rather than having to travel all over the country.”*

Similarly, the Society of Local Authority Chief Executives (SOLACE) argued that *“this is a service that should be available locally and nationally...the public should have a choice of where they go to inspect the record.”* The Scottish Green Party queried how not requiring the CORE keeper to make a copy of the full register available for personal public inspection, would substantially reduce the administrative burden.

The AEA submission indicated that the views of its members were divided and those that agreed did so with the caveat that CORE holds precisely the same information as the registration officer. The principal concerns of those that disagreed were that there should be consistency in provision of the service in that the requirements for CORE and the registration officer should be consistent.

In comparison, the AEA London Branch indicated that the majority of respondents agreed that the CORE keeper should not be required to make a copy of the full register available for personal public inspection. However, it noted that *“one respondent disagreed stating that ‘there have been numerous examples of national data sets being inaccurate, including those held by the credit reference agencies, and if CORE is to be used effectively, it is essential that it is open to public scrutiny, under direct supervision.’”*

However, the Electoral Commission commented that it *“agrees with the proposal...personal inspection of the full register is available at a local level through EROs, and at a UK-wide level through the British Library and (subject to anticipated changes to the relevant regulations) the National Libraries of Scotland and Wales.”* It went on to say that it could *“...see no reason why the CORE keeper should unnecessarily duplicate this function.”*

Discussion

A key objective for the CORE scheme is to provide a single source of electoral registration information for authorised users. As noted by the Electoral Commission, the electoral register is already widely available for inspection by individual electors and the general public. There has been no indication that this mechanism is deficient and needs to be further broadened.

In terms of the accuracy of the CORE dataset, as it will simply mirror local electoral registers, if the information is incorrect it would ordinarily be because information held by the relevant registration officer was inaccurate.

Individuals will retain the right under the Data Protection Act 1998 to check the information that might be held on them by CORE, which will require the CORE keeper to notify the registration officer to correct any inaccurate information (refer also to question 24).

Consequently, it is intended that the CORE keeper will not be required to make a copy of the full register available for supervised public inspection.

CORE scheme

This has no implications for the CORE scheme at this time.

Q15. Do you agree with the proposal that authorised bodies should be granted direct electronic access to the CORE central dataset to browse and/or initiate an electronic search for an individual record? If yes, we would welcome your views on how a charging structure might

work for those who are normally expected to pay for copies of the register. If you disagree, please set out your reasons.

The consultation paper suggested that users with an ongoing need to access electoral registration information should have direct access to CORE, and that this would include the Electoral Commission, registered political parties, registered credit reference agencies and the police. It was also suggested that returning officers could be given direct access, perhaps on an 'as needed' basis tied to the length of the election period.

Although other organisations and individuals, such as election candidates, might be entitled to a copy of the electoral register, the consultation paper argued that it may not be appropriate to provide them with direct access to a CORE system.

Of the 118 responses received, 96 provided a comment in relation to this question. Of these, seven did not agree with the proposal that authorised bodies be granted direct electronic access to the CORE central dataset to browse and/or initiate an electronic search for an individual record.

For example, EONI disagreed as *"...it would be difficult to monitor use of direct access facilities and therefore security could be compromised."* Similar concerns were noted by North Norfolk District Council. The Scottish Green Party indicated that it was *"...extremely concerned about accountability, data protection and function creep. We believe that the only philosophically legitimate use of the register in this way would be in relation to political activity."*

The SNP agreed *"...that a search mechanism/engine should be available to registered political parties..."*, although it expressed concern that the consultation paper suggested that a user might be able to browse or search by name or other personal identifier. It commented that it did *"...not believe that additional personal identifiers such as age and signature should be available to anyone other than the ERO and for the CORE integrity checks. Giving search facility on other personal identifiers not currently available on an electoral register extends the functionality of the register beyond its current purposes."*

The Conservative Party also commented that *"it is essential that CORE is available for direct access to Registered Political Parties...as it is impossible for us to convert the electoral register of 45 million records and load it into our database all in a single day..."*. Experian indicated that *"...on line access will be helpful...[in]...dealing with queries and disputes...[and]...would reduce the workload of local authorities and CORE staff..."*

However, CallCredit indicated that it saw “...CORE’s key responsibility to maintain a central database of [electoral register] records for bulk supplying.” Similarly, the Electoral Commission argued that it was not “...clear that a robust business case for [online] access has been established...”, commenting that “...large-scale users...are likely to use their own datasets to identify specific records, and would only require occasional online access to CORE to verify records held in their own database against original electoral registration data in the event of any inconsistency.”

In its response, the British Library requested that it be granted direct electronic access to CORE, and stated that “...this would enable the British Library to provide a valuable public service in facilitating access by citizens to appropriate data and could complement and reduce pressures on the services provided by local EROs and the central office.”

In terms of a charging structure, most respondents suggested an annual licence fee. For example, the AEA suggested that “authorised bodies should be charged an annual licence fee [and] an additional fee...for each check made in excess of a specified number.” The AEA stated that the “ERO should receive the whole fee and CORE should apply an administration fee to cover their costs.”

However, Intelligent Addressing, a public/private joint-venture partnership with the Local Government Information House Limited, itself a subsidiary of IDeA, suggested that “per click’ licences are becoming more common and indeed the Office for Public Sector Information (OPSI) has drafted such licences...[the Royal Mail] fee for postal addressing is 0.5p and the [Ordnance Survey] fee is 5.0p.”

Discussion

As noted under questions 2 and 5, CORE will not provide information in relation to an elector over and above that which may currently be provided to an authorised organisation or individual in published registers, issued alteration notices or absent voter records. To the extent that information is not already part of the electoral register, alteration notices or absent voter records, these will not be provided, or be accessible, to users of CORE.

Providing direct access to CORE is consistent with the key objective of providing a single source of electoral registration data for authorised users, but would entail a number of practical and technical considerations.

While there is some support for providing direct access to CORE for political parties, it is unclear whether this would replace the need for parties to maintain their own databases. Hence the expected costs (and benefits) of providing direct access will need to be considered, and an assessment made as to whether it is feasible to provide. It is anticipated that the CORE feasibility study will investigate cost estimates for providing direct online access to the CORE information system, initially for political parties and registration officers.

Where political parties are provided with electoral registration information under the relevant legislation the supply of the data is generally free of charge. Consequently, it is considered that if political parties and registration officers were to be provided with direct online access to the central CORE dataset, this would also be without charge.

If the decision is taken to implement direct access, the ‘communication’ rules to govern the transfer of data between the CORE keeper and authorised users will need to be sufficiently broadly defined in the regulations.

CORE scheme

The CORE scheme will allow the CORE keeper to establish ‘communication’ rules to govern the exchange of data between the CORE keeper and authorised users. The scope of the ‘communication’ rules should be sufficiently broad to cover direct access by such users to CORE, as well as the provision of data from the CORE keeper to authorised users.

Q16. If direct access to a CORE system for the purpose of confirming identity were to be established, we welcome views on who exactly should be given the ability to use that facility.

The consultation paper suggested that CORE might be used to confirm an individual’s identity.

Of the 118 responses received, 93 provided a comment in relation to this question. Of these, only three respondents did not agree that access should be provided to a CORE system for the purpose of confirming an individual’s identity.

Two linked their response to the previous question. Mr Martin Austin expressed reservations based on data protection concerns, with North Norfolk District Council adding that “...there are too many question marks about maintaining the confidentiality of information and ensuring a consistent approach.”

The Scottish Green Party believed that CORE “...*should not be used for this purpose...making the database an element of identity confirmation risks maximising disenchantment with [electoral] registration.*”

In general, respondents did not distinguish between access provided to electoral registration information under the existing legislative framework, and potentially broadening this for the purposes of establishing identity. For example, the SAA argued that “*access should be to a limited number of those currently entitled to a copy of the full register...only for electoral purposes, including donations and by government departments and security forces.*”

The AEA echoed similar views. They suggested that direct access to CORE for the purpose of confirming identity should be restricted to existing full register users and registration officers. Registration officers may benefit from being able to verify where applicants had come from if this was not provided on the application form; it would also assist with checking if individuals had moved and where they had moved to.

Discussion

Although electoral registers may currently also be used to verify an individual’s identity, it is not intended that access to the CORE dataset for the purpose of confirming an individual’s identity be extended beyond those individuals or organisations already entitled to access this information under the existing legislative framework. This is the opposite view to the majority of the respondents to this question.

CORE scheme

This has no implications for the CORE scheme at this time.

Q17. Do you agree with the proposal that online/telephone access to CORE should be made available for householders to confirm the accuracy of a pre-completed canvass form (for forwarding to the relevant ERO), but not to make changes (including adding or deleting electors)? If you disagree, please set out your reasons.

The consultation paper suggested that CORE could act as a central point through which electors could interact to some degree with their local electoral register. For example, CORE could replace and extend existing online registration facilities already provided by some registration officers during the annual canvass period where no change is required to pre-completed canvass forms.

Of the 118 responses received, 94 provided a comment in relation to this question. Of these, 35 did not agree that online/telephone access to CORE should be made available for householders to confirm the accuracy of, but not to make changes to, a pre-completed canvass form for forwarding to the relevant registration officer.

In the main, opposition to this proposal hinged on the intrusion of the CORE keeper on the legislative role and responsibilities of local registration officers. For example, the AEA commented that *“...the independence of the ERO could be compromised and this move could be perceived as an introduction to a centralised registration system...it confirms the view that...electoral registration must be conducted at a local level.”*

The SAA argued that the proposal in the consultation paper would *“...lead to a blurring of the edges between the responsibilities of the CORE keeper and that of the local ERO. We see no need for the CORE keeper to replace existing providers of this service.”*

While indicating its support in principle for the proposal, the Electoral Commission also noted that *“many EROs currently offer an internet or telephone canvass response service at a local level”* and argued that *“...a similar service...by the CORE system would effectively duplicate some services offered locally, a firm business and policy case would have to be made in order to justify transferring this responsibility from local EROs to the CORE keeper.”*

However, the Labour Party suggested that *“the general public will expect to be able to check, confirm and edit their information online”* and that *“...the CORE project should come forward with proposals, with in built security features, that enable individual electors to do this.”*

Discussion

In the future, the CORE information system could act as a central point through which electors could interact to some degree with their local electoral register. However, it is understood that a commercial supplier already provides a telephone and internet electoral registration service for around 200 local authorities, although this is restricted to the annual canvass period each year. There is no intention for CORE to duplicate these services.

The service allows households to confirm that there are no changes to the electors living in their household, but does allow them to opt-out of the edited register. In this context, the Information Commissioner's Office noted that *"...in order to improve the integrity of the system, using such a service would be preferable with individual registration forms rather than household ones."*

Given that some registration officers already enable electors to confirm the accuracy of a pre-completed canvass form via telephone and internet, it is not intended at this time to provide for online and/or telephone access to CORE for householders to confirm the accuracy of a pre-completed canvass form (for forwarding to the relevant ERO). Further, CORE providing such a service would not be consistent with the position that local registration officers are ultimately responsible for compiling the electoral register.

However, the Electoral Commission has subsequently indicated that, if it is designated the CORE keeper, it would be keen to offer a service that would enable individual electors to contact the Commission to check their registration status. Specifically, this would most likely occur through a dedicated telephone hotline, which would require the individual to confirm their name and address. The Commission would then either confirm that the individual was registered at that address, or otherwise indicate that they are not registered in respect of that address.

If the individual was not registered in respect of their current address, the Commission would advise the individual how they could apply to be added to the register, and would also send a generic registration form to the individual for completion and forwarding to their local registration officer. If this service were to be offered, the CORE scheme order will contain the necessary enabling provisions.

CORE scheme

To be confirmed.

Q18. Do you agree with the proposal that an individual elector should be able to access directly all the information held on them by a CORE system, for the purpose of confirming accuracy and/or requesting changes? If you agree, please state whether you would prefer to see the ability to confirm accuracy and request changes implemented at the same time or the ability to request changes implemented later. If you disagree, please set out your reasons.

The consultation paper suggested that an individual elector might be able to log into the CORE information system and see all the information that CORE, and therefore the local registration officer, holds on them. This could include the main register information, as well as absent voting preferences and any 'off-register' information, such as anonymous elector details and personal identifiers that CORE may hold. CORE could then allow the elector to confirm the accuracy of any of this information or, if necessary, request a correction.

It was proposed that confirmations, or requested changes, would be relayed to the relevant registration officer for action. CORE would not change any of its records directly in response to an elector's notification; it would do so only in response to an update from a registration officer. This means that an elector would not see an immediate change on CORE.

Of the 118 responses received, 94 provided a comment in relation to this question. Interestingly, a total of 24, less than for the previous question and counter to what might have been expected, did not agree that an individual elector should be able to access directly all the information held on them by a CORE system, for the purpose of confirming accuracy and/or requesting changes.

The Electoral Commission indicated that, while *"...it would be useful to provide a single, central point of contact for individual electors to confirm the accuracy of their current registration details, either by telephone or using the Internet"*, it did not believe that *"...a clear business case has...been made for the inclusion of a system of individual online access, [although] provision should be made to add it at a later date..."*

The SNP, while agreeing with the proposal subject to appropriate levels of security being in place, also indicated that it would prefer to see the ability to confirm accuracy and/or request changes implemented later.

Nevertheless, the AEA agreed that an individual elector should be able to access directly all the information held on them by a CORE system, for the purpose of confirming accuracy and/or requesting changes “...*subject to security check to confirm identity...[but]...any changes...[should]...only be applied by the ERO through the normal process. The ERO has a duty to ensure the information is correct and changes processed by CORE could potentially conflict with the local register.*”

Discussion

As discussed, a key objective of the CORE scheme is to provide a single source of electoral registration information. To effectively achieve its key objective, CORE must mirror information held on local electoral registers, which would otherwise be provided to authorised users.

The CORE information system will be based on a system design similar to the Central Integrity Reporting Repository model, Model 4. A key feature of this model is that local electoral registration officers will continue to be the owners of the registration information and ultimately responsible for the content on local electoral registers, and therefore CORE. Further, and as noted in question 14, the electoral register is already widely available for inspection, and there has been no indication current arrangements are deficient.

As noted under question 17, it is also understood that at least one commercial supplier is considering extending the existing telephone and internet electoral registration confirmation service to allow householders to make changes to electors in the household. This would include, for example, a change of surname on marriage, and adding and removing electors from the household.

The DCA understands that there may be some uncertainty around whether this is permissible under existing legislation, as the Electoral Commission commented that it was “...*not clear that allowing electors to request changes to their records would be possible without significant change to the legal framework for electoral registration...[as changes must]...be accompanied by an elector’s signature.*”

Nevertheless, although the telephone and internet electoral register confirmation service is currently only provided on a pre-completed form sent to households in the annual canvass each year, this could potentially be provided on an ongoing basis.

Hence, while one of the longer term electoral modernisation objectives is to provide direct access for individuals to view their own registration details, and to allow the individual to request and/or affect changes to those details, it would appear that registration officers themselves are already moving in this direction.

In addition, it is questionable whether providing this service through CORE would be cost effective. The following question (Question 19) suggests that the Government Gateway and/or Connect 'Register' strand could be used to authenticate individuals. However, it is not clear that the frequency with which individuals would actually access government services would justify it.

In any event, if the CORE keeper were to provide a telephone hotline service as discussed in the previous questions, this would achieve many of the benefits otherwise achieved by providing direct online access to individuals. Consequently, at this time it is not intended that individual electors be able to access directly all the information held on them by a CORE system, for the purpose of confirming accuracy and/or requesting changes.

CORE scheme

This has no implications for the CORE scheme at this time.

Q19. Do you agree with the proposal that CORE should look to use the Government Gateway and/or the Government Connect 'Register' strand as the means by which an individual may verify themselves and gain direct online access to the information held about them on CORE? If you disagree, please set out your reasons.

The consultation paper recognised that providing an individual access to his or her electoral registration details, and the ability to request changes, would require additional security measures, including the ability to verify the individual's identity before access is granted. It argued that the cost of developing a CORE-specific identity verification process would probably outweigh the perceived benefit of individual access.

Consequently, the consultation paper proposed that online access to the CORE information system be included as an additional service once individuals have registered. Registration could be through either the existing Government Gateway secure portal, or through the developing 'Register' strand of the Government Connect programme (which itself will use the existing Government Gateway infrastructure).

Of the 118 responses received, 83 provided a comment in relation to this question. Of these, ten did not agree that CORE should consider using Government Gateway and/or the Government Connect 'Register' strand as the means by which an individual may verify their identity and gain direct online access to the information held about them on CORE.

In the main, comments from those respondents that did not agree with the proposal centred around security concerns, although it would appear that there was some confusion on what was being proposed in the consultation paper. For example, Basingstoke and Deane Borough Council suggested that a secure identity check system could be cost prohibitive, which is precisely what using the Government Gateway and/or the Government Connect 'Register' strand was intended to avoid.

XPress suggested instead that *“electors should gain access to the CORE system via the ERO who can use other data collected to verify the elector’s identity and check [the] quality of data held.”*

Of the remaining 73 respondents, 57 agreed that CORE should look to use the Government Gateway and/or the Government Connect 'Register' strand as the means by which individuals may verify their identity and gain direct online access to the information held about them on CORE.

For example, the AEA agreed, subject to compatibility with existing user software, reliability and security. Despite claiming that a business case for individual online access had not been made, the Electoral Commission agreed but argued that *“while the CORE project should certainly explore possible verification mechanisms that are currently available or in development...a key priority for the project will be to develop a clear functional specification for the delivery of effective online access.”*

The Information Commissioner’s Office also agreed, commenting that *“...the ability to correctly identify that an individual is who they say they are when they wish to log on to CORE to make changes to their information is very important”,* and *“insofar as the Government Gateway/Government Connect 'Register' has been specifically developed to provide secure access...it would seem that this is an appropriate mechanism for verification.”*

The remaining 16 respondents neither explicitly agreed nor disagreed with the proposal, but provided a range of comments. For example, the SAA commented that while it was *“...aware of the difficulties and duplication of providing a new system of verification, [it was] sceptical that the Government Gateway is either mature enough or has wide enough uptake to be acceptable.”*

Discussion

As noted in the response to questions 17 and 18, DCA does not intend to provide for online and/or telephone access to CORE for individuals at this time. The electoral register is widely available for inspection, both nationally and locally, and there has been no indication that current arrangements are deficient. Therefore Government Gateway will not be used by the CORE information system at this time.

CORE scheme

This has no implications for the CORE scheme at this time.

Q20. Do you agree with the proposal that CORE should cross-match information it holds to identify apparent multiple instances of the same individual elector? If you disagree, please set out your reasons.

The consultation paper suggested that, as CORE would hold consolidated electoral registration information, it would be able to undertake a variety of checks on the integrity of registers. However, it was recognised that the ability to identify duplicate registrations was dependent on unique identifiers as part of the registration process, as already occurs in Northern Ireland where an individual's national insurance number is collected, as well as a personal identifier (date of birth), which is not unique. The Electoral Administration Act 2006 does not provide for the allocation of unique identifiers, therefore CORE's ability to undertake checks on the integrity of registers will be limited. Should future legislation be introduced to allow for the allocation of unique identifiers, CORE would then be able to cross-match data, strengthening the integrity of the registers.

Of the 118 responses received, 94 provided a comment in relation to this question. Of these, only three did not agree that CORE should cross-match information it holds to identify apparent multiple instances of the same individual elector.

The SAA argued that *“registering to vote at more than one address may be allowed depending on individual circumstances”*, and that *“it would appear to be a waste of public resources to identify multiple entries for the same individual, particularly if the identifiers do not accurately identify the individuals.”* This view was echoed by South Ayrshire Council.

Powys County Council suggested that *“cross-matching is often already undertaken by local EROs...”* but that *“...more often than not it tends to be a futile exercise, partly because of the lack of personal identifiers.”* It argued that it did *“...not believe there is a problem of double registration motivated by deliberate intention to fraudulently obtain additional votes...in Wales.”*

Nine respondents, while not agreeing or disagreeing with the proposal, suggested that cross-matching of information within CORE should only occur if appropriate unique identifiers were collected as part of the registration process. For example, Brentwood Borough Council commented that although *“...not disagreeing in principle, it is difficult to envisage how this could be implemented without [unique identifiers]...”*

In addition, Intelligent Addressing Ltd suggested that the Unique Property Reference Number (UPRN), which forms part of the National Land and Property Gazetteer (NLPG) that is based on locally collected address information, might be another basis on which to perform integrity checks on electoral register addresses.

However, the vast majority of respondents, 82, agreed with the proposal that CORE should cross-match information it holds to identify apparent multiple instances of the same individual elector.

For example, the Scottish Green Party stated that *“identifying multiple instances [of registration] is clearly a useful function...[although] for many [this is] a side-effect of seasonal mobility (particularly with students) and care should be taken not to disadvantage any group – in the end the crime is multiple voting not multiple registration.”*

The Electoral Commission also agreed that *“...a key future role...should be to support cross cutting data analysis to improve the overall quality of the UK registration data set...[although]...this level of functionality is highly dependent on the collection and recording of electors’ personal identifiers.”*

Similar sentiments were expressed by the AEA, who indicated that *“initially this match could produce a significant number of duplicate elector entries which would produce an immediate and significant workload. A filtering system would be required to address those electors (eg students) who can register in more than one place.”* The AEA added that *“it would not be uncommon for persons to have the same name and date of birth...[which] illustrates the need for additional personal identifiers...”*

Discussion

As noted in the introduction, a longer term strategic objective for the overall CORE project is to improve the integrity of electoral registers through data cross-matching to detect potential electoral register anomalies.

However, it is acknowledged that in the short term, the ability of CORE to detect any potential anomalies will be limited to postal and proxy voter lists, as there is no provision in legislation to collect or allocate unique identifiers.

Unique identifiers should not be confused with the personal identifiers proposed by the Electoral Commission for individual registration. Personal identifiers such as signature and date of birth are not ideal for use in CORE for data checking. Signatures are not readily usable in this context and dates of birth are not unique (albeit the chances of two or more people with the same name having the same birth date are relatively low).

Should future legislation allow for the allocation of additional unique identifiers as part of the registration process, CORE would then provide an opportunity to detect potential anomalies at a national level.

In any event, the Electoral Administration Act 2006 requires that the CORE keeper, in accordance with the scheme, inform a registration officer if he believes that an individual is registered at more than one address, if more than a specified number of postal votes are requested for the same redirection address, and/or if the same individual acts as proxy for more than two electors.

Consequently, it is intended that CORE cross-match the information it holds to detect potential electoral registration anomalies, but that the scheme provide the CORE keeper with some discretion as discussed below and in the following two questions.

Subject to the allocation of unique identifiers as part of the electoral registration process, it is intended that the CORE keeper cross-match information held on the consolidated CORE dataset. This would be done to determine whether a person is registered at more than one address where the addresses are not in a single local authority area. It would happen no earlier than two months after publication of the revised registers is required. Where the CORE keeper identifies any instances, the CORE keeper must notify the relevant registration officers.

CORE scheme

This has no implications for the CORE scheme at this time.

Q21. Do you agree with the proposal that CORE should cross-match information it holds to identify apparent instances of the same individual acting as proxy for more than two electors? If you disagree, please set out your reasons.

The consultation paper indicated that an eligible individual may be appointed as proxy for only two different electors, unless they are close family members. It suggested that CORE may be able to identify where an individual appears to have been appointed as proxy by more than two electors, and thus identify a risk that this restriction had been breached.

Out of 118 responses, 91 respondents provided an answer to this question. Nine respondents disagreed with the proposal that CORE should cross-match the information it holds to identify apparent instances of the same individual acting as proxy for more than two electors.

For example, the SAA argued that *“these checks were already carried out and dealt with locally...CORE could not be definite with regard to the relationship of the proxy to the elector and this would result in many ‘apparent’ instances unnecessarily being reported to EROs.”*

In the main, those respondents that disagreed with the proposal did so on the basis that, as pointed out by the Electoral Commission, *“under Schedule 4 of the Representation of the People Act 2000, a person commits an offence if she or he votes as a proxy for more than two people who are not family members in any local authority area or constituency. The detection of this offence would be dependent on access to marked register information...and would continue to be most effectively administered at a local level.”*

Similarly, Enfield Borough Council commented that *“...an individual can be appointed as proxy for more than one person (and in some instances, for a large number of family members). No offence is being committed at this stage, so it would be inappropriate for the duplicate records to be flagged.”*

Eight respondents, while not explicitly agreeing or disagreeing with the proposal in the consultation paper, expressed similar concerns to those highlighted above.

Of the remaining 74 respondents, 35 agreed but also provided a range of comments that reflected the sorts of concerns expressed by those who disagreed with the proposal. For example, the Conservative Party commented that it agreed that “...*CORE should be used to prevent breaches of the law, such as the attempt to act as proxy for more than two electors...*[However,] *we caution that electors are entitled to act for more than two electors in circumstances laid down in legislation.*”

Discussion

Refer to discussion under question 20.

It is intended that the CORE keeper, cross-match information held on consolidated proxy voter lists to determine whether an individual acts as proxy for more than two electors. This will be done no earlier than two months after the publication of the revised registers and list of overseas electors is required.

If the CORE keeper finds that an individual is acting as proxy for more than two electors in two or more local authority areas the CORE keeper must notify the relevant registration officers.

CORE scheme

The CORE keeper shall, no earlier than two months after the revised registers and list of overseas electors are required to be published under the relevant legislation, cross match information held on consolidated absent voter records to determine whether an individual acts as proxy for more than two electors.

Where the CORE keeper believes that the above circumstances have arisen in relation to electors registered on electoral registers held in two or more different local authority areas, he must notify the relevant registration officers.

Q22. Do you agree with the proposal that CORE should cross-match information it holds to identify apparent instances of the same address being used as the mailing address for the postal votes of multiple electors? If you agree, what do you think might be an appropriate threshold figure at which an alert should be triggered? If you disagree, please set out your reasons.

The consultation paper suggested that CORE might be able to detect multiple instances of the same correspondence address receiving postal voting papers. It further sought views on the threshold that should be set for the system to flag an address for investigation. Although this might also capture large multi-occupancy addresses such as student halls of residence or nursing homes, local registration officers would quickly be able to exclude these from further investigation.

Out of 118 responses, 93 respondents offered a response to this question. Six respondents disagreed with the proposal that CORE should identify apparent instances of the same address being used as the mailing address for the postal votes of multiple electors by cross-matching the information held.

The SAA commented that *“...checks are best carried out and monitored locally with the benefit of local knowledge helping to identify any possible instances of this type of potential fraud”*, while North Cornwall District Council suggested that *“...cross matching is unlikely to be a meaningful exercise given the number of properties in multiple occupation and the difficulties associated with establishing an effective threshold.”*

Eighteen respondents neither agreed nor disagreed with the proposal but offered a range of comments. For example, the Southern Branch of the AEA commented that the proposal *“...would only be useful when the addresses for the postal votes are not the registered addresses of the Electors”*, adding it thought it impractical *“...to set thresholds until the pilots have been conducted.”* The Conservative Party suggested that *“a threshold figure is not necessarily appropriate as for example ten electors with the same surname may just indicate an extended family holiday.”*

Sixty-nine respondents agreed with the proposal, and of these, 43 suggested threshold figures ranging from 2 to 25. A majority, 22 respondents, suggested that the appropriate threshold figure at which an alert should be triggered was six. For example, the AEA commented that *“...the threshold figure should be 6, but this will need to exclude halls of residence, nursing homes and other large institutions”*, a point of view that many other respondents agreed with.

The Electoral Commission agreed that *“...a central CORE keeper may have a useful role to play in identifying addresses which appear to be used for the diversion of suspicious numbers of postal votes....a CORE keeper could add value by identifying multiple redirections to a single address from electors registered in different local authorities.”*

However, it declined to suggest a threshold figure at which an alert should be triggered, commenting that *“it would be difficult to identify a blanket threshold figure for triggering further action. Rather, reporting on redirections might incorporate a number of thresholds for action depending on the possible risk of fraud, with different actions attached for recommendation by the CORE keeper to the ERO(s) concerned.”*

Discussion

Concern around the potential for anomalies to arise in absent voting arrangements has already resulted in significant changes to the applicable legislative framework. For example, the Representation of the People Regulations 2006, which came into force in May 2006, will see registration officers writing to everyone who has applied for a postal vote acknowledging receipt of their application and confirming the outcome - thus alerting people to false applications for postal votes on their behalf.

Postal vote applicants will also have to provide a reason for wanting to have their postal vote redirected to an address other than that at which they are registered. Electoral registration officers will also have more time to check postal vote applications, as applications will have to be received 11 working days before the close of poll rather than the six days at present. In addition, electoral administrators will be required to check the signatures on postal vote applications against any other signatures the local authority holds.

Further changes to absent voter arrangements are included in the Electoral Administration Act. It is now an offence to falsely apply for a postal or proxy vote. There will also be new secrecy warnings on postal and proxy voting papers to deter any attempt to unlawfully influence another person's vote, while ballot papers will have a security mark and a barcode to enable quick security checks for stolen postal votes.

After every election a list of all those who voted by post is to be published, which will enable individuals to check that their vote was received. In an investigation, the police will be able to check up with any individual whether they did actually vote by post or whether their vote was stolen.

These measures will go a long way towards minimising the likelihood of fraud in postal voting arrangements. However, as noted in response to question 21, the Electoral Administration Act requires that the CORE keeper, in accordance with the scheme, inform a registration officer if he believes that more than a specified number of postal votes have been requested for the same address.

Consequently, it is intended that CORE will cross-match information it holds to identify apparent instances of the same address being used as the mailing address for the postal votes of six or more electors.

Specifically, it is intended that the CORE keeper cross-match information held on consolidated postal voter lists to determine instances of the same address being used as the mailing address for the postal votes of six or more electors. This would be done no earlier than two months after publication of the revised registers and list of overseas electors is required. If the CORE keeper identifies that the above circumstances have arisen in relation to electors registered on electoral registers held in two or more different local authority areas, the CORE keeper must notify the relevant registration officers.

CORE scheme

The CORE keeper shall, no earlier than two months after the revised registers and list of overseas electors are required to be published under the relevant legislation, cross match information held on consolidated absent voter records to determine whether more than six postal votes have been requested for the same address.

Where the CORE keeper believes that the above circumstances have arisen in relation to electors registered on electoral registers held in two or more different local authority areas, he must notify the relevant registration officers.

Q23. Do you agree with the proposal that CORE should cross-match information it holds to identify apparently inappropriate instances of multiple voting by the same individual? If you disagree, please set out your reasons.

Working on the assumption that it would hold an electronic copy of the marked register, the consultation paper suggested that CORE might be able to detect instances where an individual had registered, received and possibly returned more ballot papers than they were entitled to. It should be noted that an individual may be validly registered in two different local authority areas, but may only vote at one UK Parliamentary election. However, as noted in Question 3, it is not intended at this time that the CORE scheme require returning or registration officers to provide an electronic copy of the marked register to the CORE keeper. Out of 118 responses, 93 respondents answered this question. Only seven disagreed with the proposal that CORE should cross-match information it holds to identify apparently inappropriate instances of multiple voting by the same individuals. This is despite most respondents earlier commenting that CORE should not hold copies of the marked electoral register.

Respondents' reasons for disagreeing with the proposal in the consultation paper included the cost of transferring the marked register to CORE, belief that duplicate voting was not currently a problem, as the registration process was sufficiently robust, and that the inclusion of the marked register on CORE would unnecessarily compromise public trust in the electoral process.

For example, the Electoral Commission disagreed with the proposal on the basis that it would be highly dependent on access to marked register information, which it did not view as a priority for CORE Phase 2 (refer also to question 3). Powys County Council also reiterated comments made in answer to question 3 that public knowledge of the inclusion of the marked register in CORE would cause public trust to be 'severely shaken'. Additionally it did *"...not believe that there is a problem of double registration leading to double voting at UK Parliamentary elections, either in Wales or nationally in the UK"*, and that the proposal was not a *"...meaningful deterrent to a perceived problem that probably does not exist anyway."*

Nine respondents commented on the proposal, but neither agreed nor disagreed. North Norfolk District Council acknowledged duplicate voting was *“...an issue of concern, particularly with the current lack of clarity about registration of second home owners”*. However, it went on to question whether *“retrospective investigation is the most effective way of tackling electoral fraud. Preventative measures must surely be more valuable, particularly when one takes into account the logistical difficulties with transferring this information to the CORE system.”*

Portsmouth City Council commented that *“such information will not prove that multiple voting has occurred. For example, a student registered at home and at a student address may receive two postal votes. There would still be a need to prove that both had been used at a parliamentary election”*. South Lakeland District Council suggested that the *“...ability to register in two different ERO areas should be removed which would enable much easier cross-matching to find multiple voters.”*

However, a total of 76 respondents agreed with the proposal, although a number, including the AEA, noted that this would be dependent on information from the marked register being passed to CORE. The London Branch of the AEA also indicated it supported the proposal *“...providing that the marked registers were loaded onto the system...[although] there [were] concerns raised that at present the cost and time involved in loading marked registers onto CORE would massively outweigh the possible benefit of identifying the small number of instances where multiple voting was suspected.”*

The Conservative Party stated that it believed that this was *“an important benefit of CORE”*, and that such checking would *“help to rebuild confidence in the electoral system.”* However, it also added that it believed *“the introduction of individual registration of electors would yield greater benefits in this area.”*

A number of those who responded positively echoed the comments of Test Valley Borough Council that *“cross matching could only happen if personal identifiers were available”*, and that it was *“not possible to be absolutely certain that it is the same person unless personal identifiers are available and this is not possible at present.”*

Discussion

As noted under question 3, a key objective for the CORE scheme is to provide a single source of electoral registration information. In the longer term, it may also provide an improved means to strengthen the integrity of electoral registers and detect potential instances of electoral register anomalies through cross-matching of data.

It is considered that CORE is best able to enhance the integrity of elections by supporting registration officers in maintaining and strengthening the integrity of electoral registers, and that this should remain the focus for CORE for the foreseeable future.

It is not proposed that the CORE scheme require that returning or registration officers provide an electronic copy of the marked register to the CORE keeper. Consequently, CORE will not be able to identify instances of apparently inappropriate multiple voting by the same individual.

CORE scheme

This has no implications for the CORE scheme at this time.

Q24. Do you agree with the proposal that CORE should refer apparently anomalous information it receives back to the originating EROs? If you disagree, please set out your reasons.

The consultation paper suggested that, if apparent duplicate entries were identified by CORE, these be referred to the relevant registration officer(s) for investigation. CORE would not amend any information held until provided through an update from the registration officer.

Out of 118 responses, 95 respondents provided a view on the proposal that CORE should refer apparent duplicate entries back to the originating registration officers.

Only one of the respondents, Kirklees Metropolitan Borough Council, disagreed. It commented that it was *“extremely concerned about the amount of unnecessary work this will generate, particularly with regard to students”, as “the vast majority of second and third year students live in rented private accommodation and it would be very difficult to distinguish which people are in fact students without a lot of unnecessary work by EROs.”*

Five respondents neither agreed nor disagreed with the proposal but offered comments. For example, the Labour Party commented that it *“would like to see more detailed proposals about the procedures that would be followed should anomalies within the register be found”* and felt *“clear parameters need to be in place surrounding the lines of responsibility between EROs and the CORE keeper.”*

Oswestry Borough Council argued that registration officers *“normally check out anomalous information before placing names etc on the Register”* and suggested therefore that *“this would normally be duplication of work.”*

The remaining 89 respondents all agreed with the proposal that CORE should refer apparent duplicate entries back to the originating registration officers. For example, Wealden District Council agreed, although it noted that *“to avoid duplication of effort and possibly disenfranchisement of eligible electors, there would [need] to be clear guidance about which ERO took action.”* This view was echoed by other respondents.

The Electoral Commission supported the approach outlined in the consultation paper, where, consistent with the Central Integrity Reporting Model, local registration officers retain total responsibility for making alterations to electoral registers.

Discussion

As discussed under previous questions, to achieve its key objective of providing a single source of electoral registers, CORE must effectively mirror the information held on local electoral registers.

The Central Integrity Reporting Repository (Model 4), which is preferred by respondents, retains the current system of local ownership of data. This recognises that registration officers are ultimately responsible for determining whether an individual is entitled to be included in the register and for the data included on an electoral register.

Nevertheless, to strengthening the integrity of local electoral registers, the CORE keeper must notify the relevant registration officer of apparent duplicate entries or other electoral register anomalies. This was discussed in relation to questions 20, 21 and 22.

CORE scheme

The CORE scheme is to be based on a system design similar to the Central Integrity Reporting Repository (Model 4), which in part will involve an ‘integrity engine’ within CORE checking data against specified rules. The objective of this will be to identify possible duplicate records and other electoral register anomalies, and to provide a reporting mechanism.

It is proposed that electoral register anomalies that span local authority boundaries be referred to the relevant registration officers.

Q25. Do you agree with the proposal that an ERO should be required to actively respond to formal notifications from CORE of apparent anomalies? If you disagree, please set out your reasons. Whether you agree or disagree, we would welcome any informed assessment of what the initial and longer term resource impact of any such requirement would be on EROs.

The consultation paper indicated that CORE should not be prescriptive about the action required of registration officers in response to a notification from CORE of apparent duplicate entries or anomalies. However, it did suggest that registration officers would be required to actively respond to a notification from CORE.

For example, the consultation paper suggested that such a response could be either: to confirm that a record is valid (and therefore should not appear in the next set of notifications from CORE); or that the matching record should be ‘held over’ and appear again in the next scheduled notification if not yet investigated. Local registration officers would correct records when sending their regular information updates to CORE.

Out of 118 responses, 95 respondents provided a view as to whether a registration officer should be required to actively respond to formal notifications from CORE of apparent duplicate records or anomalies.

Ten of those that responded disagreed with the proposal. A number of these considered this would create unnecessary additional work, as an individual may be legitimately registered in two places. For example, Wycombe District Council commented that while *“it may be easy to recognise student accommodation addresses as part of halls of residence”*, this would not be true of *“...normal addresses, or second or holiday homes, and the ERO does not have the resources to check on perfectly legitimate registrations.”*

Similarly, the SAA suggested that *“this would not be a good use of ERO resources as duplicate registration is permitted in certain circumstances.”* It agreed to the receipt of notifications but disagreed with the requirement for the ERO to actively respond as *“...any action taken will be reflected in updates to register.”*

Twelve respondents neither agreed nor disagreed with the proposal but offered comments. For example, Dacorum Borough Council commented that *“the majority of notifications will be to either confirm that an elector is registered correctly at two address (students etc) or to remove an elector that has moved from one address to another, but that even if they were straightforward they would still take time to investigate and could be reliant on an elector’s response to a request for confirmation of residence.”*

Halton Borough Council suggested that *“EROs should be expected (not required) to take necessary reasonable steps to clarify anomalies”,* but that *“sufficient funding needed to be provided to the ERO (not the Local Authority) to accommodate the additional work should it become a requirement.”*

The remaining 73 respondents agreed that registration officers should be required to actively respond to formal notifications from CORE of apparent anomalies. For example, the Electoral Commission supported the proposal but added that, *“in order to minimise the potential impact on the workload of electoral services staff, this requirement should be supported by automated processes wherever possible.”*

SOLACE suggested that *“the initial impact [of the proposal] on resources is likely to be high – may need a full time member of staff for a period. The eventual impact will be less, but taken with all the other requirements put on EROs by CORE, it would seem likely that at least one full time member of staff may be required for an average sized District/Borough. For a larger Unitary/London Borough, the requirement is likely to be higher. Much more work needs to be done on this before CORE is implemented.”*

The West Midlands branch of the AEA also agreed with the proposal, subject to resources being made available, adding that it was *“impossible to make an informed assessment of the likely impact at this stage. It may not be a huge problem for most EROs but those with large university populations may well be inundated with anomalies, which will be cyclical and on-going.”*

EONI, which has experience in this type of approach, commented *“the initial resource impact would be considerable; however, the workload should reduce over time.”* It added that *“there will always be a consistent level of ‘apparent anomalies’ following each canvass. Electors registered more than once for genuine reasons, eg holiday home or clerical error. We agree that CORE should be advised where notifications of anomalies have been resolved or are carried over.”*

Similarly, King's Lynn & West Norfolk Borough Council suggested that this was *“currently done...at a local level and this year took approximately 120 hours with an electorate of 116,000.”* It added that personal identifiers *“should reduce numbers considerably”*, although during the canvass period *“the number would be too great to deal with before publication and would need to be investigated in the 2-3 months following.”*

The AEA response agreed with the proposal but commented that *“this will result in significant additional work. It is unlikely to result in any additional permanent staff resources but at annual canvass period additional temporary staff may be required. Probably looking at 1 person for 2/3 weeks for an authority with 100,000 electors.”*

Discussion

As noted in response to question 20, the Electoral Administration Act requires that the CORE keeper, in accordance with the scheme, inform a registration officer if he believes that an individual is registered at more than one address, if more than a specified number of postal votes are requested for the same address, and/or if the same individual acts as proxy for more than two electors.

There is no specific obligation in the Act itself on registration officers to respond to a notice from the CORE keeper. However, it would be unhelpful to both registration officers and the CORE keeper if the same duplicate entries and other potential anomalies continued to be included in the notice sent from the CORE keeper to the registration officer. Clearly, the CORE keeper needs to exercise some discretion, particularly around the time of the annual canvass, on what requirements are imposed on registration officers, and this is considered in more detail in the following question.

In addition, if formal notices from CORE of apparent duplicate entries or other electoral register anomalies were limited to instances where they crossed local authority boundaries, this should limit the number of notices being issued by the CORE keeper. This also recognises that local registration officers are best placed to consider such matters within a local authority area.

As a result, it is intended that the CORE scheme require registration officers to actively respond to formal notifications from CORE of apparent duplicate entries or other anomalies.

CORE scheme

The CORE scheme will require registration officers to actively respond to formal notifications from the CORE keeper where he had identified apparent duplicate entries or other anomalies that involve more than one local authority area.

Q26. If a requirement to respond is established, we welcome views on how frequently such notifications should be sent, how long an ERO should have to respond, and what penalty (if any) should attach to any failure to respond.

The consultation paper suggested that a large amount of notifications may be generated after CORE is first established in an area (and a smaller amount around each annual canvass time). This might require notifications to be sent and responses to be made on a monthly basis. However, once the system has bedded down in an area, it was argued that it may be more appropriate to change the frequency to weekly.

Out of 118 responses, 81 respondents provided an answer to this question of how frequently notifications should be sent. Fifteen respondents did not give a quantitative answer but offered comments.

The SAA suggested that “...no timetables for responses should be established, as enquiries may be complex or difficult, though performance reports may encourage EROs to react”, while Equifax commented that “time should be adequate to investigate depending on volume of records and other data may have to be made available to EROs to carry out these checks.”

Fifty-two of those that provided an answer believed that notifications should be sent monthly, eight suggested that notifications should be weekly and three thought notifications should be made as soon as possible. Other suggestions were daily, frequently and less than monthly.

The AEA also supported “*notifications issued on a monthly basis*”. The Electoral Commission commented that “*it was likely that EROs would experience a significant peak in workload following publication of the new register each December, when new registrations added during the canvass period are compared by the CORE system with other registers*”, but agreed that “*subsequent monthly checks following publication of alterations to registers should not involve such heavy workload.*”

Basingstoke and Deane Borough Council was among the eight respondents who suggested that notifications should be sent weekly. It commented that “*once the system has bedded down then, weekly notifications should be sent.*”

Fifty-six respondents suggested timescales varying from 72 hours to one year in response to the question of how long an ERO should have to respond to notifications. Twenty respondents suggested a period between 3 weeks and one month, 11 respondents less than 3 weeks, a further 11 felt that it should be more. Others suggested that it should be ‘as soon as possible’ and ‘frequently’. Eight respondents felt that it would be inappropriate to set timescales for registration officers to respond.

The AEA commented that a “*period of around 21 days for ERO response would then appear to be appropriate.*” South Holland District Council suggested that the ERO should have “*a month to respond. On some occasions it may be difficult to resolve the issue within a month but the majority of anomalies should be able to be resolved relatively quickly.*” EONI argued that “*there should be some time limit on ‘hold over’ requests to ensure that action is taken*”, and suggested that this should be one year.

Fifty-four respondents provided comments as to whether a penalty should be set for failure by the registration officer to respond to a notice from the CORE keeper. While three respondents suggested that a registration officer’s failure to respond should be raised with the Returning Officer or Chief Executive of the local authority, the majority, 30 respondents, did not consider that penalty was appropriate.

South Lakeland District Council felt that “*the idea of ‘penalties’ should be avoided. This has to be a two-way process, EROs already do this work to a great extent, and ‘penalties’ hovering over EROs would endanger good working relationships and future responses and increase working pressures.*” The SAA agreed with this point of view adding that “*penalties are inappropriate and would establish the wrong tone for the whole project.*”

Sixteen respondents suggested this could be incorporated into performance standards. For example, Enfield Borough Council commented that *“a performance standard should be set which will act as the ‘penalty’ for registration officers. Performance against that standard should be published each year, flagging up the poorly performing registration officers.”* The AEA also commented that *“no penalty should be imposed on an ERO for failure to respond to an enquiry raised by CORE”*, but they added that they accepted that *“such response times may well feature in performance standards.”*

Discussion

As discussed under questions 21 to 25, it is intended that the instances in which the CORE keeper would issue formal notices of apparent duplicate entries and other electoral register anomalies will be limited to instances where such matters cross local authority boundaries.

Consequently, the number of notices issued by the CORE keeper is likely to be significantly fewer compared to that envisaged by respondents to the consultation paper. In addition, it is intended that the CORE keeper not undertake cross-matching of data earlier than two months after the revised electoral register and list of overseas electors is required to be published.

As a result, it is envisaged that registration officers should be able to respond to any such notices within 20 working days. The suggestion that responding to the CORE keeper within such a time period be included in key performance indicators for each electoral registration officer is accepted. It is not intended that the CORE scheme specify penalties to be imposed on registration officers who do not meet this timeframe.

CORE scheme

It is intended that the CORE scheme require registration officers to respond to a formal notice from the CORE keeper within 20 working days. It is anticipated that the Electoral Commission will include this timeframe in key performance indicators and targets by which the performance of electoral registration officers can be assessed.

Q27. Do you agree with the proposal that an ERO should be able to run a check online with CORE to see whether a particular individual already has a record held on that dataset? If you disagree, please set out your reasons.

The consultation paper suggested that a registration officer might be able to request a duplicate search when considering a rolling registration or absent voting application from an elector. CORE would then provide any information already held on that elector, or supply a nil return. It was suggested that this could assist in ensuring the integrity of registration officers' records, an underlying objective of the rolling registration process.

Out of 118 responses, 90 responded to this question. Five respondents disagreed with the proposal that a registration officer be able to run a check online with CORE to see whether a particular individual already had a record held on that dataset. Of these, three, including the West Midlands branch of the AEA, indicated that as CORE would already be cross-matching information, it would not be necessary for EROs to do this as well.

Similarly, the Electoral Commission commented that *"it would appear to be more efficient for the CORE keeper to run one check across all registration records....rather than requiring EROs to second guess this process."* Test Valley also disagreed commenting that *"it is not possible to be certain if it is the identical elector. This proposal could easily result in people being disenfranchised."*

Eighty-three respondents agreed that a registration officer should be able to run a check online with CORE to see whether a particular individual already had a record on that dataset. For example, SAA commented that *"access to the CORE dataset might well be a useful tool for ERO staff in the effort to keep the register as clean as possible. ERO access to CORE should be free."* Similarly, the Information Commissioner's Office agreed with the proposal, finding that the *"function seems to be in keeping with the aims and objectives of setting up CORE i.e. to improve the integrity of the register."* Equifax also suggested this ability would be useful, but should not be mandatory.

The Conservative Party commented that it would seem *"perfectly proper to us for an ERO to check as he deems necessary the validity of an individual's application to be added to the register."*

While the Southern Branch of the AEA's response agreed with the proposal, it suggested that EROs should have *“the power to search CORE for previous addresses in order to delete them. This would stop dual registration, which is reasonably widespread (students, those with pied-a-terres for work purposes).”*

Discussion

The legislative framework prescribes when an individual is entitled to be included on a register of parliamentary and of local government electors, and the role of the registration officer in ascertaining that the person is in fact entitled to be included on the register.

In addition, a rolling registration application requires the applicant to include any address at which he or she is currently registered as an elector, if they no longer reside there. As soon as is practicable, the registration officer must notify the registration officer for the previous address as they are required to remove that person from that register. As a result, the onus is on the registration officer to be satisfied that a person is entitled to be on the register: the fact that the person may already be included on another register does not provide grounds per se for refusing to add that person to his register. The actual benefit to a registration officer of being able to run a check with CORE to see whether a particular individual already has a record held on that dataset is therefore unclear.

However, section 2(11) of the Electoral Administration Act specifically prohibits access by a registration officer to information provided to the CORE keeper by another registration officer, unless it relates to a notice provided by the CORE keeper in relation to a potential duplicate entry or other electoral anomaly.

CORE scheme

This has no implications for the CORE scheme at this time.

Q28. Do you agree with the proposal that CORE should be able to provide statistical data? If you disagree, please set out your reasons.

The consultation paper suggested that CORE be able to supply statistical information to the Electoral Commission, Government, or academics for monitoring or research purposes, subject to this information having been sufficiently de-personalised, so as to ensure that it did not infringe data protection requirements.

Out of 118 responses, 88 responded to this question. Only one respondent, Callcredit, disagreed with CORE providing statistical data, commenting that the proposal “...goes beyond the stated remit of CORE.”

Four respondents neither agreed nor disagreed with the proposal. Of these, two considered that there was insufficient information in the consultation paper to respond. Eastbourne Borough Council was concerned that data could be “*slightly out of date given the time the data updates*” and questioned “*where the liability for error [would] lie since the data originates from the ERO.*” Additionally it suggested an audit of “*who requested the data and when it was supplied*” should be given to each local authority to “*prevent duplication of data.*”

Eighty-three respondents agreed with the proposal, though some qualified their comments that their agreement was subject to statistical data being kept anonymous and meeting Data Protection Act requirements.

For example, the Office of National Statistics (ONS) supported the proposal, commenting that “*CORE would be a valuable statistical tool*”, adding that “*at present there is no equivalent dataset, the manual electoral register database being of limited use to us; CORE presents the opportunity to link this important dataset with other datasets and to help transform population, demographic, social and even some business statistics.*”

The House of Commons Library commented that it “*...would welcome the provision of...summary statistics...[from CORE as]...the only resource available to us are the data from...the publication of the Electorate Statistics series by the Office of National Statistics, usually in February each year. A facility whereby we could ascertain online the number of electors in a given area at particular dates would be very useful.*”

The AEA also agreed that CORE should be able to provide statistical data and suggested that this should include the issuing of “*...constituency electorates to the media for a particular parliamentary election.*” The Electoral Commission echoed this view, adding that “*...although it may be necessary to clarify who will be able to access the CORE database for research purposes, de-personalised statistical information should be made as widely available as possible.*”

Discussion

The Representation of the People (England and Wales) Regulations 2001 provide for the registration officer to supply a copy of the full register free of charge (and list of overseas electors) to a range of organisations, including the ONS.

The ONS is the government department with responsibility for producing a wide range of economic and social statistics. It also registers life events and holds census information. The ONS already publishes a range of statistics based on electoral information supplied by local registration officers, including for example tables showing the number of parliamentary electors for each parliamentary constituency and the number of local government electors for each local authority area.

While the CORE dataset could act as an alternative source of statistical information, it would hold the same information as is already provided to the ONS. It is therefore unlikely that CORE would provide better or additional statistical data than is currently provided by the ONS. However, like other authorised users of electoral registration data, the ONS is likely to benefit by being able to obtain this information from a single point rather than from more than 450 local registration officers.

It would also appear that CORE could support the ONS, should it be considered appropriate, in increasing the frequency with which the *Electorate Statistics* series is published, for example to quarterly. To ensure consistency in data series, it is considered that the ONS, rather than the CORE keeper, should continue to collate and publish such publicly available statistics. However, it is intended that the CORE scheme allow the CORE keeper to use the CORE dataset set to undertake statistical analysis to support its statutory functions.

CORE scheme

It is intended that the CORE scheme order would provide for the ONS to obtain electoral registration information directly from the CORE keeper, rather than from individual registration officers.

If the Electoral Commission is appointed CORE keeper, the CORE scheme will allow the use of the CORE dataset set for statistical analysis to support the Commission's statutory functions.

Q29. Do you agree with the proposal that CORE should, once established, discharge the statutory mutual reporting responsibilities concerning EU citizens voting in European Parliament elections? If you disagree, please set out your reasons.

Under reciprocal obligations, each member state is required to notify other EU member states of its residents who are citizens of those states and are registered to vote for European Parliament elections. This is to ensure that individuals do not vote in both their state of residence and their state of origin.

The consultation paper suggested that CORE could handle the notification to other EU member states, providing a single consolidated notice for the whole area covered by the CORE scheme. It could also take on the task of dealing with information received from other member states, passing it on to local registration officers.

Respondents overwhelmingly supported this proposal, with 83 of the 85 that responded to this question agreeing that CORE should discharge the statutory mutual reporting responsibilities concerning EU citizens.

Many of the respondents that supported the proposal felt that it was a logical step and would make the process more efficient, saving time and creating more consistency. For example, the AEA suggested that it *“... would be a positive move in resolving a process that is currently flawed and uncoordinated.”*

However, the Electoral Commission neither agreed nor disagreed but suggested this would be *“...highly dependent on collation of marked register information by the CORE keeper”*, and that, until the information was *“...collated centrally by the CORE keeper, this function is likely to remain most effectively carried out at a local level.”*

The Information Commissioner’s Office felt that, while the suggestion was valid in terms of simplifying the process, it would be difficult to justify the CORE record being used when *“...an earlier section of the consultation paper suggested that the ERO registers should continue to be used for returning officers as they would be the most accurate and up to date.”*

Discussion

Section 9 of the European Parliamentary Elections Act 2002 makes it an offence for a person to vote more than once in European Parliamentary elections whether in the UK or elsewhere. Registration officers are required to send to the nominated representatives of other States a copy of the application and declaration made by citizens of other European Union states resident in the UK. This is stipulated in the amended European Parliamentary Elections (Franchise of Relevant Citizens of the Union) Regulations 2001. Comparison with a marked register is still required to ascertain whether such persons had voted more than once.

In this context, section 5(2)(a) of the Electoral Administration Act allows the CORE scheme to make provision as to the circumstances in which the CORE keeper and registration officers may agree that the functions of one of the them may be exercised by the other. Hence it would be possible for the CORE keeper to perform the obligations imposed on registration officers by the European Parliamentary Elections (Franchise of Relevant Citizens of the Union) Regulations 2001.

As noted in question three, it is not intended that CORE will hold a copy of the marked electoral register at this time. Therefore, it will not be possible for the CORE keeper to determine whether an individual has voted more than once in European Parliamentary elections. This role will still fall to the returning officer(s) for European elections.

Currently, the DCA has been nominated by the Secretary of State to receive copies of the application and declaration made by citizens of the UK resident in other European states. There is no provision within the Act for the CORE keeper to assist the Secretary of State, or the DCA, and hence it is not possible for the CORE scheme order to give the CORE keeper a role in this regard.

CORE scheme

This has no implications for the CORE scheme at this time.

Q30. Do you think CORE Phase 2 should be established in geographical stages, or to cover the whole UK at once? If in stages, please state what level of geographical coverage you believe would be appropriate for the first CORE scheme. Suggestions as to which particular area(s) should be part of the first scheme and expressions of interest would be particularly welcome.

The consultation paper indicated that it was originally envisaged that a national CORE scheme would become operational across the UK at the same time. However, it acknowledged that there was an argument to be made for a more staged approach to implementation.

Out of 118 responses, 93 responded to this question. Of these, 18 believed that CORE Phase 2 should be established to cover the whole UK at once. For example, the Electoral Commission indicated that it did “...not agree that Phase 2 of the CORE project should be implemented in geographical stages”, as this would “...not meet the central business need of authorised users for a single point of access to registration data...” It went on to argue that any implementation risks should be “...addressed through appropriate and thorough pre-implementation testing, and the provision of training and guidance for EROs.”

Users of electoral registration data also favoured CORE Phase 2 being established to cover the whole UK at once. For example, the SNP acknowledged that “...the benefits of CORE will only be realised when complete geographic coverage is achieved.” Similarly, the credit reference agencies favoured this approach, with Equifax noting that “...a staged approach should only be seen as a way of testing the system but not implementing it.”

However, 59 respondents felt that CORE should be established in stages. For example, EONI commented that “CORE phase 2 should be implemented in geographical stages...[Northern Ireland] would be keen to act as part of the first scheme.” The SAA also suggested that “a phased approach would act as (a) a proof of concept for the technology; and (b) a testing ground for business process changes within EROs...”, but it accepted that “...it would not, however, permit achievement of the project objectives, which depend on a national data set.”

Most local authorities’ views were reflected in the AEA’s response, which argued that “for the scheme to be fully tested...a European region would be...appropriate.” It also suggested that “...any pilots are conducted in areas with high social diversity so as to anticipate and experience potential pitfalls of the use of personal identifiers.”

Discussion

A key objective for the CORE scheme is to provide a single source of electoral registration information. This will not be achieved unless and until the scheme covers the whole of the UK. If national access is not achieved, CORE is unlikely to be the preferred channel through which authorised users access electoral registration information.

As indicated in this paper, the CORE scheme itself is not expected to impose any additional material burden on registration officers, as the requirement to provide information to the CORE keeper will be aligned with the statutory obligation to publish registers, lists and alteration notices. In addition, the CORE scheme will not itself result in any change to the electoral registration process, or information collected as part of that process.

As a result, it is intended that CORE Phase 2 be established to cover the whole UK at once. However, developing regional CORE schemes will be considered before procurement and would be at the request of the CORE keeper. For example, if the Electoral Commission were keeper, such schemes could reflect the organisation's regional focus with a CORE scheme for each of the regional offices in:

- the South West, likely to be located in Exeter;
- the Midlands, to cover the East and West Midlands, likely to be in Coventry;
- the North East, North West and Yorkshire & the Humber, likely to be in York; and
- the South, to cover London, Eastern and the South East, to be located in London.

CORE scheme

It is intended that the CORE scheme order provide for the commencement date of the provisions of the scheme to be made by a date nominated by the Secretary of State, and that the scheme apply to the whole of the UK, although this will be negotiated with the CORE keeper.

Q31. Do you think that the Electoral Commission should be appointed as the keeper of a CORE scheme? If you do, would your answer differ if a first scheme was on a relatively small scale? If you would prefer to see some other body appointed as CORE keeper, please say who and set out your reasons.

The consultation paper suggested that the Electoral Commission be the CORE keeper, although it acknowledged a need to clearly define the roles, responsibilities and access to information of staff in the Commission, given it would be both data 'keeper' and consumer (in fulfilling its statutory role in checking donations to political parties).

It was suggested that, if the initial area covered by the CORE scheme was only one region (or smaller), an experienced local registration officer with 'front-line' experience and familiarity with the geographical area covered may make a better 'keeper'.

Of the 118 responses received, 92 provided a response in relation to this question. Of these five disagreed with the proposal that the Electoral Commission be appointed CORE keeper. A number commented that to do so would result in a conflict of interest for the Commission, while others suggested that a broader range of options should be considered.

For example, EONI commented that the CORE keeper should be *"...an independent body – not one who requires access to the register"*, suggesting that the Chief Electoral Officer for Northern Ireland should be CORE keeper in Northern Ireland, and that the AEA would be most suitable to act as CORE keeper in Great Britain. Northgate Information Solutions suggested other organisations should be considered *"...including not-for-profit or community interest companies along the lines of the Registry Trust or the Council for the National Land Information Service."*

Stirling Council felt that, for the Electoral Commission to *"provide an independent audit/scrutiny role in relation to the conduct and administration of elections it will be inappropriate for it to become the keeper of CORE. If this is to be the case alternative audit/scrutiny controls would have to be established."* Other suggestions were the Information Commissioner and IDeA.

Eight respondents neither agreed nor disagreed with the proposal. For example, Experian simply suggested that the CORE keeper needed *"to be an independent organisation outside those that supply the data."*

However, 78 respondents agreed that the Electoral Commission should be appointed CORE keeper, with the majority arguing this should be the case regardless of the scale of the scheme as this would be a valuable learning experience prior to a national scheme. A number suggested that a local registration officer/returning officer could assist the Electoral Commission in this role.

For example, the Southern Branch of the AEA agreed that the Electoral Commission should be the CORE keeper and suggested that even if the scheme were smaller scale it should be *“led by the Electoral Commission.”* It added that it was *“...essential that CORE is maintained by a non-political and non-profit making organisation that has awareness of the workings of the ERO, i.e. the Electoral Commission.”*

Software supplier Halarose agreed that the Electoral Commission should be appointed as CORE keeper, adding that it saw *“...no benefit in giving this role to a different body if the scheme is first established on a smaller scale”*, citing discontinuity and the loss of the opportunity for *“...staff to learn from experience”* as reasons.

An overall theme throughout the responses was that the CORE keeper should be an independent public body outside the sphere of political influence. For example, the AEA commented that the keeper *“...should be independent of local authorities and central government”*, and agreed that the Electoral Commission met this criteria. Nevertheless, it also suggested that *“...some other body such as the Association of Electoral Administrators could also satisfy the requirements outlined in the consultation paper without the potential for possible conflicts of interest.”* Though it should be noted that since the AEA represents electoral registration officers this would, in fact, introduce a conflict of interest.

The Electoral Commission commented that as an *“independent UK-wide statutory authority”* it believed *“that the Commission may well be an appropriate body to effectively discharge the functions of a UK-wide CORE keeper.”* It went on to address possible concerns about the Commission having a ‘dual-role’ and agreed that *“appropriate internal governance arrangements would be necessary to properly separate the Commission’s data manager and data user functions.”*

Discussion

The functions and duties that are to be performed by the CORE keeper in providing a single source of electoral registration data, and in cross-matching that data across all electoral areas, are not currently performed by another body. The only limitation on the designation of a CORE keeper under section 1(10) of the Electoral Administration Act is that the CORE keeper must be a public authority.

In performing its functions, the CORE keeper will need to balance the interests of political and commercial users of electoral registration data and those of registration officers that supply the data. As a result of actual, or perceived, conflicts of interest that may arise, it is not considered appropriate for a registration officer, a political or commercial user, or a representative body of either to be designated as CORE keeper.

Further, it is unlikely that the relatively limited scope of activities of the CORE keeper would warrant the establishment and operational of a new independent body to perform this role.

While there is potential for conflicts to arise where services are provided for external as well as internal consumption, these can be effectively managed through the development of a service level agreement that spell out in detail the level of service (e.g. timeframes within which requests for information are actioned) that is to be provided.

The Electoral Commission needs to access the electoral register to conduct audits of the compliance of political parties with the Political Parties, Elections and Referendums Act 2000. In providing access to the data to political parties (and other authorised individuals and organisations) it is not clear if any conflict of interest is involved. It could be argued that this is in fact a positive move as it provides additional impetus for the CORE keeper to ensure the provision of high quality electoral registration data.

It is also clear that there must be a single CORE scheme and therefore a single CORE keeper if the benefits of providing a single source of electoral registration data are to be met.

CORE scheme

The CORE scheme will define who the CORE keeper will be. This is still to be decided.

Q32. Do you think any of these potential future linkages of an electoral registration dataset with other datasets should be explored more actively in future? Please set out the reasons why you think they should or should not be further explored, and detail which datasets may be more suitable for CORE to link to if there were to be such linkage in future.

The consultation paper suggested that linkages with other databases might be explored in future to facilitate updating of electoral registration information, for example reflecting amendments in a register of births, deaths and marriages. It was also suggested that linkages with other databases could assist in strengthening the verification of elector's details, as well as identify gaps in electoral registers.

Of the 118 responses received, 91 provided a response in relation to this question. Of these, 15 disagreed with CORE exploring linkages with other datasets. Credit reference agency Call Credit felt that this would be *"...going beyond the remit of CORE"*, while the SNP argued that *"...dependency or linkage to any other Government system will delay the delivery of the basic CORE system and damage the long term security and integrity of the system."* Three Rivers Council also suggested that it was necessary to *"...ensure CORE [was] up and running before further linkages [were explored]"*.

A number of respondents expressed concern over a possible link between CORE and the National Identity Card Register. In particular, the Conservative Party had *"...grave concerns over the unwelcome potential for data-sharing with other Government databases, including the ID Cards Agency and the Valuation Office Agency, due to privacy and civil liberty concerns."* The Scottish Green Party commented that it was *"...opposed to the tracking of citizens in a national identity database."*

Other respondents were concerned about the use of electoral registration data for non-election purposes and the potential impact on registration rates. The SNP commented that they believed *"...individuals should not have to consider their status with any other government agency when determining whether to register to vote. We believe that the perception of 'Big Brother' will result in a reduction in the registrations and disenfranchise particular socio economic strata."*

North Cornwall District Council echoed this view, arguing that *"...there are substantial existing difficulties associated with voter mistrust of the registration system. If the Electoral Registration Data Set were to be linked with other Data Sets this would only increase to the detriment of local democracy."*

Several respondents noted concerns about the quality of other datasets that would be used, with the SAA suggesting that the proposal “...could result in EROs chasing spurious non-qualified persons and anomalies gleaned from other, and possibly inferior, data sets.”

Fifteen respondents offered comments but neither agreed nor disagreed with the question. Many raised concerns about the quality of the other datasets used. Data protection issues were also raised.

The Information Commissioner’s Office recognised that data matching with other databases to improve the integrity of the register may be desirable, and expressed a preference that this should be limited to public sector databases. It emphasised that any “...information you link to must be useful for your purposes, it should be sufficient and relevant, but not excessive...You would need to consider from the outset what information you actually need access to and limit your access to that information alone.”

The Electoral Commission agreed “...that wider data-sharing and matching may hold the potential to further improve electoral registration data quality”, but noted that “...given difficult issues raised by the possibility of further data sharing...the question should be considered in a wider context than that provided by this particular consultation paper”. It added that it “...would not be able to support any further liberalisation of access to information from the full electoral register.”

Nevertheless, 63 respondents agreed that potential future linkages of an electoral registration dataset with other datasets should be explored more actively in future. Many felt that cross checking would assist with the integrity of the register and help registration levels. In particular, datasets containing personal identifiers or nationality information were highlighted. The importance of the suitability of the datasets and the need to respect data protection were also stressed.

Those datasets most frequently suggested, in order of frequency, were: the Register of Births, Deaths and Marriages (22); National Identity Register (14); Passport Office (14); Driver and Vehicle Licensing Authority (13); National Insurance Numbers (13); Benefits Agency (12); Inland Revenue (8); and Council Tax (5).

For example, the AEA identified “...*the proposed England and Wales-wide register of births, deaths and marriages, council tax records, passport office, national insurance numbers, driving licence records*” as possible datasets. It also suggested that “...*for stringent verification of records at keeper level, links with an ID Card Register dataset would be worth pursuing.*” The Liberal Democrats indicated that it “...*agreed with the general principle that more data matching and cross-checking should occur, though with safeguards to protect personal privacy.*”

Discussion

As noted earlier, in the longer term CORE will provide an improved means to strengthen the integrity of electoral registers and detect potential instances of electoral register anomalies through cross-matching of data. However, without identifiers that are more unique than name and address, effective cross-matching of data will initially be limited to absent voter records.

If future legislation provided for the allocation of unique identifiers, and these were included in the CORE dataset as intended, opportunities to undertake further cross-matching of data held within the CORE dataset would arise. At that time, consideration could also be given to cross-matching of records within CORE with information held in other datasets in order to further strengthen the integrity of electoral registers.

Therefore, it is not intended at this time that information in the CORE information system be linked with other datasets. However, the CORE information system is intended to be flexible enough to allow new functionality, such as linkages to other databases and data matching, to be added as legislation and policy allow in the future.

CORE scheme

This has no implications for the CORE scheme at this time.

Annex A – List of consultation questions

Q1: Do you agree that Models 4 and 5 are best suited to meet the aims and objectives of Phase 2 of the CORE project? If you disagree, please state which model you believe would be a better fit and set out your reasons.

Q2: Do you agree that all information that currently appears on the full register of electors should be held in the CORE? If you disagree, please state which information from the full register that you believe should NOT be held in CORE, and set out your reasons.

Q3: If responsibility for retention of the marked register is in future to be the responsibility of EROs, what is your estimate of the cost of getting such information imported to a consolidated CORE system, and do you think it would be good value for money for the benefit to the integrity of the election that would result?

Q4: Do you agree that information set out in the statutory absent voter lists maintained by EROs should be supplied to a consolidated CORE system? If you disagree, please set out your reasons.

Q5: Do you agree that any additional personal identifier information on individuals that is gathered during electoral registration should be supplied to a consolidated CORE system? If you disagree, please set out your reasons. Views on what types of personal identifier might be particularly useful and realistic for use in a CORE context would also be welcomed.

Q6: Do you agree that any future anonymous elector details should be supplied to a consolidated CORE system, subject to the same restrictions on access as apply to the originating ERO? If you disagree, please set out your reasons.

Q7: Do you agree that the Government should make the use of EML-compliant software mandatory on EROs by the end of 2006 to enable complete UK coverage of CORE Phase 1 electoral registration software standardisation? If you disagree, please set out your reasons.

Q8: Do you agree that the Government should actively pursue the possibility of using the Government Connect network for CORE data transactions, whilst also – for the time being - exploring the viability of alternative networking approaches? If you disagree, please set out your reasons and what approach to establishing a suitable network you would prefer.

Q9: Do you agree that EROs should send updates to a CORE central system on a daily basis? If you disagree, please set out your reasons and what frequency of updating you would prefer to see instead.

Q10: Do you agree that data sent by EROs should go straight into the CORE record, with subsequent integrity checking and reporting of possible anomalies? If you disagree, please set out your reasons.

Q11: Do you agree that, in areas where a CORE scheme is operational, specified large-scale users of electoral registration data should no longer be able to obtain such data direct from local EROs? If you disagree, please set out your reasons.

Q12: Do you think that, in areas where a CORE scheme is operational, smaller-scale users of electoral registration data should: a) only be able to obtain copies of the information from CORE; b) have the option to obtain the copies either from their local ERO or CORE; or c) only be able to obtain the copies from the local ERO? Please set out your reasons.

Q13: Do you agree with the proposal that returning officers should continue to obtain the register and other information required to conduct the election direct from the relevant EROs, rather than from CORE? If you disagree, please set out your reasons.

Q14: Do you agree with the proposal that a CORE keeper should not be subject to the requirements for making a copy of the full register available for personal public inspection? If you disagree, please set out your reasons.

Q15: Do you agree with the proposal that authorised bodies should be granted direct electronic access to the CORE central dataset to browse and/or initiate an electronic search for an individual record. If yes, we would welcome your views on how a charging structure might work for those who are normally expected to pay for copies of the register. If you disagree, please set out your reasons.

Q16: If direct access to a CORE system for the purpose of confirming identity were to be established, we welcome views on who exactly should be given the ability to use that facility.

Q17: Do you agree with the proposal that online/telephone access to CORE should be made available for householders to confirm the accuracy of a pre-completed canvass form (for forwarding to the relevant ERO), but not to make changes (including adding or deleting electors). If you disagree, please set out your reasons.

Q18: Do you agree with the proposal that an individual elector should be able to access directly all the information held on them by a CORE system, for the purpose of confirming accuracy and/or requesting changes? If you agree, please state whether you would prefer to see the ability to confirm accuracy and request changes implemented at the same time or the ability to request changes implemented later. If you disagree, please set out your reasons.

Q19: Do you agree with the proposal that CORE should look to use the Government Gateway and/or the Government Connect 'Register' strand as the means by which an individual may verify themselves and gain direct online access to the information held about them on CORE? If you disagree, please set out your reasons.

Q20: Do you agree with the proposal that CORE should cross-match information it holds to identify apparent multiple instances of the same individual elector? If you disagree, please set out your reasons.

Q21: Do you agree with the proposal that CORE should cross-match information it holds to identify apparent instances of the same individual acting as proxy for more than two electors? If you disagree, please set out your reasons.

Q22: Do you agree with the proposal that CORE should cross-match information it holds to identify apparent instances of the same address being used as the mailing address for the postal votes of multiple electors? If you agree, what do you think might be an appropriate threshold figure at which an alert should be triggered? If you disagree, please set out your reasons.

Q23: Do you agree with the proposal that CORE should cross-match information it holds to identify apparently inappropriate instances of multiple voting by the same individual? If you disagree, please set out your reasons.

Q24: Do you agree with the proposal that CORE should refer apparently anomalous information it receives back to the originating EROs? If you disagree, please set out your reasons.

Q25: Do you agree with the proposal that an ERO should be required to actively respond to formal notifications from CORE of apparent anomalies it has detected? If you disagree, please set out your reasons. Whether you agree or disagree, we would welcome any informed assessment of what the initial and longer term resource impact of any such requirement would be on EROs.

Q26: If a requirement to respond is established, we welcome views on how frequently such notifications should be sent, how long an ERO should have to respond, and what penalty (if any) should attach to any failure to respond.

Q27: Do you agree with the proposal that an ERO should be able to run a check online with CORE to see whether a particular individual already has a record held on that dataset? If you disagree, please set out your reasons.

Q28: Do you agree with the proposal that CORE should be able to provide statistical data? If you disagree, please set out your reasons.

Q29: Do you agree with the proposal that CORE should, once established, discharge the statutory mutual reporting responsibilities concerning EU citizens voting in European Parliament elections? If you disagree, please set out your reasons.

Q30: Do you think CORE Phase 2 should be established in geographical stages, or to cover the whole UK at once? If in stages, please state what level of geographical coverage you believe would be appropriate for the first CORE scheme. Suggestions as to which particular area(s) should be part of the first scheme and expressions of interest would be particularly welcome.

Q31: Do you think that the Electoral Commission should be appointed as the keeper of a CORE scheme? If you do, would your answer differ if a first scheme was on a relatively small scale? If you would prefer to see some other body appointed as CORE keeper, please say who and set out your reasons.

Q32: Do you think any of these potential future linkages of an electoral registration dataset with other datasets should be explored more actively in future? Please set out the reasons why you think they should or should not be further explored, and detail which datasets may be more suitable for CORE to link to if there were to be such linkage in future.

Annex B – List of Respondents

Electoral Registration Officers and public authorities by whom they are employed (78 responses)

1. Aberdeen City Council
2. Aylesbury Vale District Council
3. Basingstoke and Deane District Council
4. Blaby District Council
5. Bolton Metropolitan Borough Council
6. Brentwood Borough Council
7. Calderdale Metropolitan Borough Council
8. Carrick District Council
9. Charnwood Borough Council
10. Copeland Borough Council
11. Coventry City Council
12. Dacorum Borough Council
13. Dartford Borough Council
14. Denbighshire County Council
15. Dumfries and Galloway
16. Dundee City Council
17. East Devon District Council
18. East Lindsey District Council
19. Eastbourne Borough Council

20. Edenbridge Town Council
21. Elmbridge Borough Council
22. Enfield Borough Council
23. Electoral Office of Northern Ireland
24. Essex County Council
25. Falkirk Council
26. Gateshead Metropolitan Borough Council
27. Halton Borough Council
28. Hampshire County Council
29. Hart District Council
30. King's Lynn & West Norfolk Borough Council
31. Kirklees Metropolitan Borough Council
32. Lancaster City Council
33. Leicester City Council
34. Leicestershire County Council
35. London Borough of Harrow
36. Luton Borough Council
37. Medway Council
38. New Forest District Council
39. North Cornwall District Council
40. North Norfolk District Council
41. Oswestry Borough Council
42. Pembrokeshire County Council

43. Portsmouth City Council
44. Powys County Council
45. Preston City Council
46. Purbeck District Council
47. Restormel Borough Council
48. Runnymede Borough Council
49. Salford City Council
50. Slough Borough Council
51. South Ayrshire Council
52. South Holland District Council
53. South Lakeland District Council
54. St Edmundsbury Borough Council
55. Staffordshire County Council
56. Stirling Council
57. Suffolk Coastal District Council
58. Swale Borough Council
59. Swansea County Council
60. Telford & Wrekin Borough Council
61. Test Valley Borough Council
62. Three Rivers District Council
63. Torfaen Borough Council
64. Torrington District Council
65. Wakefield Metropolitan District Council

- 66. Walsall Metropolitan Borough Council
- 67. Waverley Borough Council
- 68. Wealden District Council
- 69. Wellingborough Borough Council
- 70. Royal Borough of Windsor and Maidenhead
- 71. West Berkshire Council
- 72. West Dunbartonshire Council
- 73. West Lindsey District Council
- 74. Weymouth and Portland Borough Council
- 75. Wigan Metropolitan Borough Council
- 76. Wolverhampton City Council
- 77. Wycombe District Council
- 78. Wyre Borough Council

Representative Bodies (6 responses)

- 79. Association of Electoral Administrators
- 80. Association of Electoral Administrators (East Midlands Branch)
- 81. Association of Electoral Administrators (London Branch)
- 82. Association of Electoral Administrators (Southern Branch)
- 83. Association of Electoral Administrators (West Midlands Branch)
- 84. Scottish Assessors' Association

Public sector bodies (8 responses)

- 85. Electoral Commission
- 86. General Register Office for Scotland
- 87. Improvement and Development Agency/Local Government Information House

88. Information Commissioner's Office

89. National Assembly for Wales

90. Office of National Statistics

91. Local Government Information House /Improvement and Development Agency

92. Welsh Assembly Government

Political parties and Individual politicians (5 responses)

93. The Conservative Party

94. The Labour Party

95. The Liberal Democrats

96. The Scottish Green Party

97. The Scottish National Party

Electoral software suppliers (4 responses)

98. Election Systems and Software

99. Halarose

100. Pickwick/Northgate Information Solutions

101. Xpress

Credit Reference Agencies (3 responses)

102. Callcredit

103. Equifax

104. Experian

Other private sector companies (1 responses)

105. Intelligent Addressing Ltd, NLPG Project

Public Bodies (5 responses)

106. British Library

- 107. House of Commons Library
- 108. Society of Local Authority Lawyers and Administrators in Scotland
- 109. SOLACE
- 110. Welsh Language Board

Individuals (8 responses)

- 111. Martin Austin
- 112. John Edwards
- 113. E. Murphy
- 114. Ken Ilet
- 115. Pam O'Hanlon
- 116. Christopher Roper
- 117. Gareth Taylor
- 118. Susan Bedford

Annex C – Details of end user consultations on data quality

Summary

The issue of data quality¹³ was frequently mentioned in consultation responses. Users in particular felt that the poor quality of data, particularly address data, held at local registers, and therefore in the CORE information system, could undermine the benefits of the project.

Poor data quality has a range of consequences. Where data is not entered and stored consistently, it becomes very difficult for an information system to compare records. This affects the ability to effectively search for particular records, to identify potential instances of fraud, and for political parties to use the data to send out correspondence.

A primary objective of the CORE project is to assist political parties to meet their obligations under PPERA. In order for them to effectively check political donations they need to transform or complete the missing or incorrect data on a monthly basis which leads to a significant administrative cost. With these concerns in mind, DCA and the Electoral Commission jointly agreed that data quality needed further investigation.

In September 2006, a smaller, targeted consultation occurred with users of electoral registration data to examine the impact of data quality. The purpose of this consultation was to determine whether poor data quality would undermine the business case of the CORE project and to develop an understanding of the extent of the problem. Users were invited to comment on a short discussion paper, and to participate in a user roundtable jointly held by DCA and the Electoral Commission.

It is important to note that improving data quality had been outside the scope of the CORE project, and that any options considered would need to take this into account. Three options were presented to users for consideration:

¹³ For the purposes of this paper, the term “data quality” includes the extent to which an elector record contains all of the relevant information, in the correct fields, and reflects the data received. It does not include data integrity which examines the extent to which the information is correct – that someone who is on the register actually has a legal entitlement to vote. A typical example of poor data quality is an elector record which does not include a correct postcode, or does not include a postcode at all.

- Option one – Proceed with the CORE project and develop an information system which outputs in a standard format.
- Option two – Proceed with the CORE project and develop an information system which outputs data as it appears on local registers.
- Option three – Stop working on the CORE project until data quality issues were addressed through a separate initiative.

Users agreed that DCA should proceed with option one which would develop a CORE information system that would make some efforts to output addresses consistently irrespective of the way in which they were entered. This would not change the quality of the data held in local registers, but would make a significant proportion of records more comparable than before and appear to be better quality. Users also requested that the project should also have a long term focus on improving data quality.

DCA considered the advice provided by the users and has widened the scope of the CORE project to take into account work around data quality. The project now has two primary objectives:

- to develop the CORE information system which will provide the single source of electoral data and allow for detection of potential instances of postal fraud; and
- to improve the quality of data held in local registers through a range of non-technical initiatives.

At the time of publication, options for achieving objective two were being considered. It is clear, however, that in order for the data quality to improve, business change needs to occur at local level to ensure that new data is entered in a consistent fashion, and that historical data is improved to meet a new set of data standards.

Specific issues

The consultations set out the impact of the Electoral Administration Act 2006 on the planning for CORE and outlined what the CORE information system would and would not do. For example, it will be a single source of data which will reduce the administrative burden on some users, but it cannot directly make changes to the data it contains.

The users noted that the lack of a standard address format was the primary data quality issue. Political parties preferred the adoption of BS7666 as the standard address format, but credit reference agencies noted that this did not suit the practices of the financial industry and preferred an alternative standard. There was agreement that the current Election Markup Language (EML) standard was too flexible in allowing simple address formats which are difficult to merge electronically.

Users requested that DCA mandate that all local authorities must output in EML if requested. This was to ensure that national standardisation could be achieved.

In addition, users advised DCA that data is often missing or incorrectly entered by local authorities. For example, postcodes are not always included in address data. The users also noted that different software suppliers provide data in different forms.

Data quality has a strong impact on the CORE project. Under current arrangements, the quality of the data is dependent on the EROs entering the data correctly. Even with standardised output of electoral registration information in EML, EROs may record the data in different ways or formats. So any variations to the way that EROs store data, or any errors made at input stage must be reflected in the CORE output as data protection laws prevent the CORE information system from making changes to the data it contains.

Poor quality data will limit CORE's ability to detect cases of potential fraud, as cross-matching of data will be difficult if there are incomplete or incorrect addresses. Poor quality data will also create work for users, who will need to transform or complete the missing or incorrect data. It was noted that political parties have difficulty sorting post by street or walksort if address details are not captured properly. In addition, checking political donations, a legislative requirement under PPERA, requires a good search capacity, which relies on good quality data.

The users also highlighted the importance of the timeframes in which they receive the electoral registration data, pointing out that some local authorities provide data earlier than others. The users noted that CORE needed to improve the timeliness of data availability in order for it to be useful.

Outcomes

After considering the feedback provided by users during this additional consultation, DCA has agreed that the CORE project should examine the quality of

electoral registration data to see how it will impact on the CORE information system.

The scope of the CORE project is to:

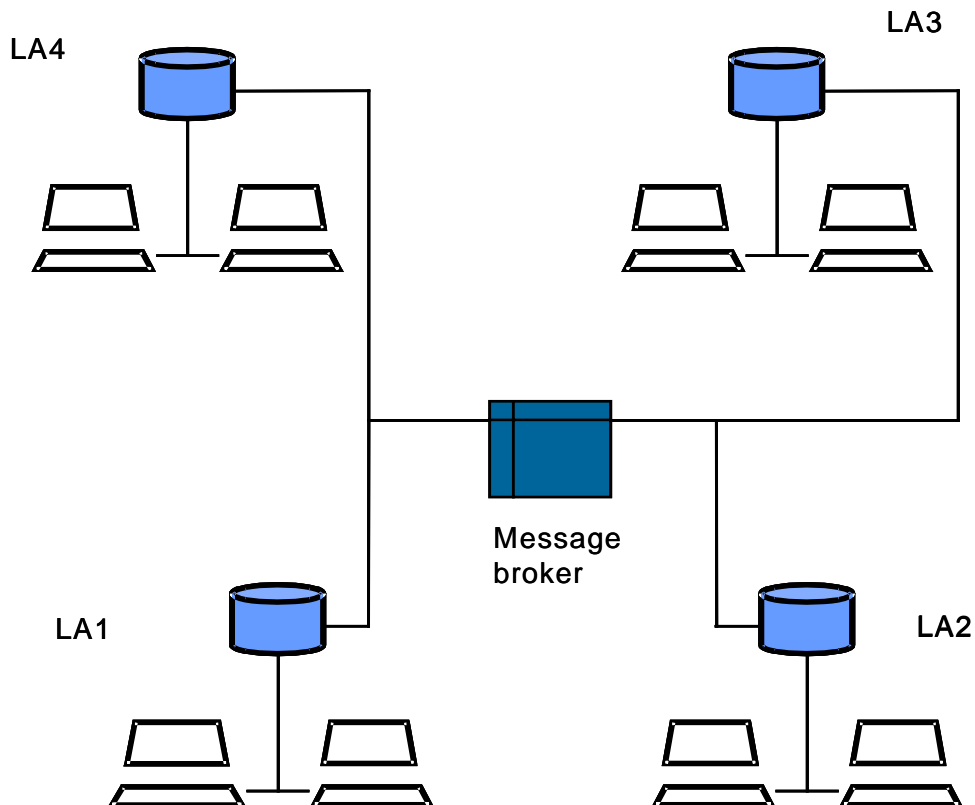
- develop the CORE information system which will provide a single source of electoral registration data; and
- to define a national standard for all electoral registration data and undertake activity to ensure that all existing and new records meet this standard.

EML already sets a minimum standard for electoral registration data, but it allows addresses to be stored in multiple formats which is not helpful for achieving national consistency. The new standard will retain the EML format but remove this flexibility, which will in turn remove any ambiguity about the way that data should be stored.

Annex D - Summary description of models

Model 1 – Registration Message Broker

The **Registration Message Broker** model has distributed Local Authority (LA) systems retaining their own data. The LA systems interact with a centralised “message broker” that coordinates transactions between them. The LA software packages are modified to provide notification to the message broker of transactions that could impact other LAs e.g. an elector moving from one LA to another. The **Registration Message Broker** then alerts the relevant LAs with messages that can be locally processed. No data is retained centrally under the **Registration Message Broker** model.



Registration Message Broker Model

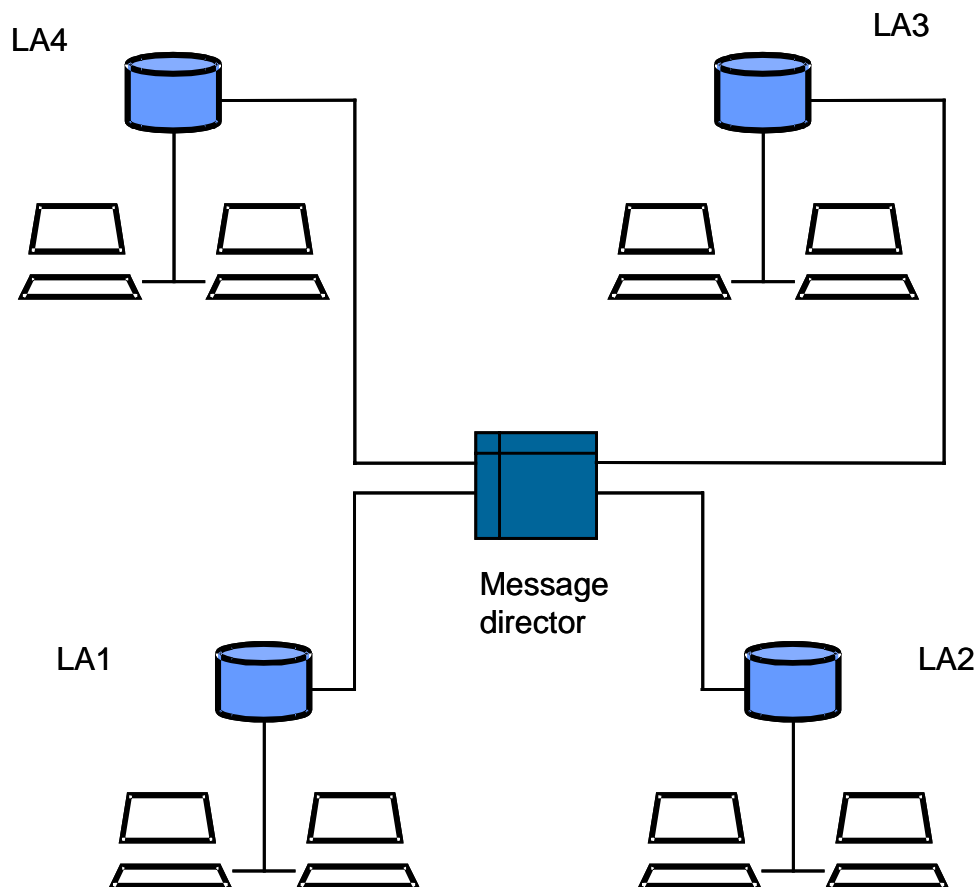
It should be noted that because the messages are undirected the **Registration Message Broker** can generate substantial messaging traffic. As a result, the

model necessitates substantial communications bandwidth at each LA and substantial manual analysis to filter the messages for relevance. Duplication of validation transactions, wherein all LAs would need to be contacted, is onerous. National data access is not facilitated per se however use of the messaging technology to request data from LAs does provide some benefits to national users.

Model 2 – Indexed Registration Search Engine

The **Indexed Registration Search Engine** is designed to address the high volume of messages associated with the registration message broker. Under this model, a centralised search engine maintains a central index that enables messages about transactions to be directed to those LAs that are most likely to find them relevant. The LA software packages are modified to interact with the search engine rather than each other. The search engine first uses the messages to further build the index and then uses the index, to identify to which LAs the messages should be forwarded by cross reference between the individual details and its physical address.

This approach goes some way to address the option 1 issues relating to bandwidth



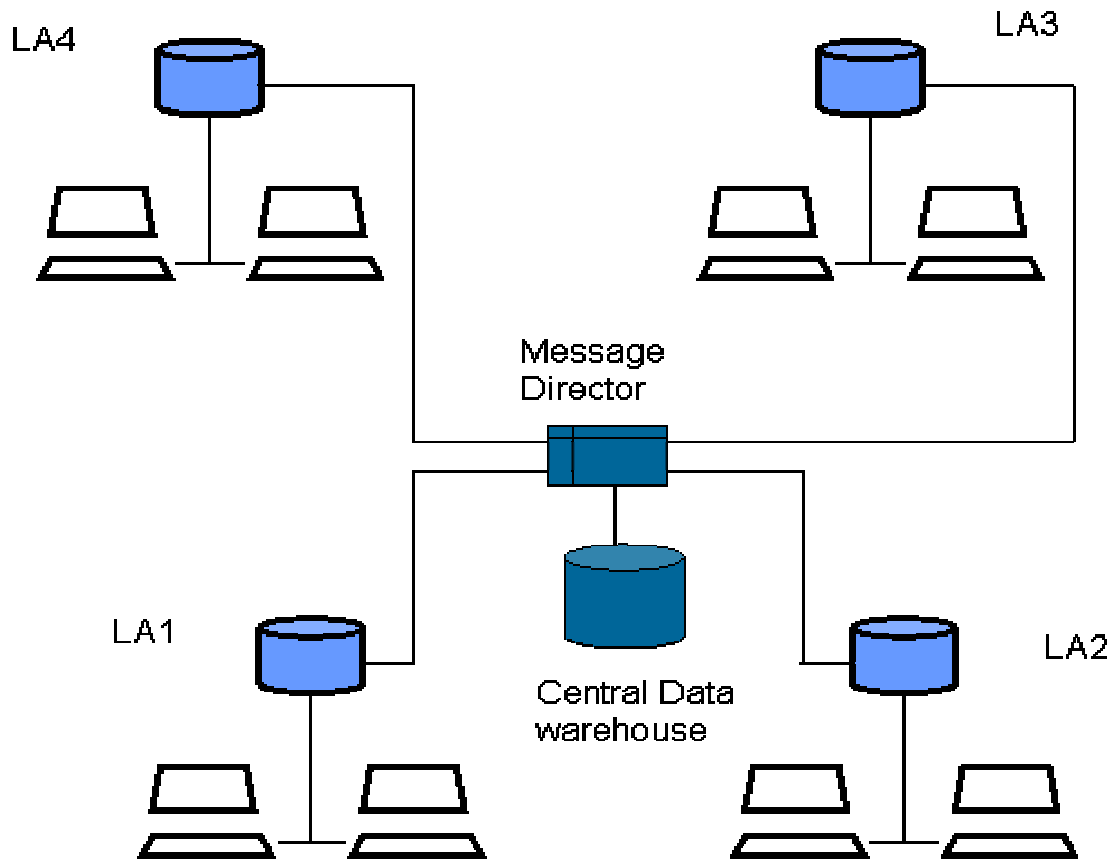
and manual filtering. However, it still does not provide full national data access.

Model 3 – Central Warehouse Distributed Transaction

The **Central Warehouse Distributed Transaction model** is characterised by a central data warehouse compiled from the messages sent between LAs in either of the previous two options. Relevant data are captured from these messages to update data in the warehouse before they are forwarded out to the Local Authorities.

This strategy provides a real time warehouse of national data without requiring LA systems to provide periodic batch loads of data. Once the data warehouse is established by copying in all the data currently held in LAs, it can be updated with message data only, substantially reducing network traffic, outages for loading into the data warehouse and load on the LA systems.

The **Central Warehouse Distributed Transaction model** should not impact performance since updates to the data warehouse are applied asynchronously. However, performing mass data synchronization transactions is not feasible under this model. There is no ongoing comparison between data in the warehouse and data held in LA systems. As such, although this is the first of the model to provide access to a national database, the database integrity would not be optimal.



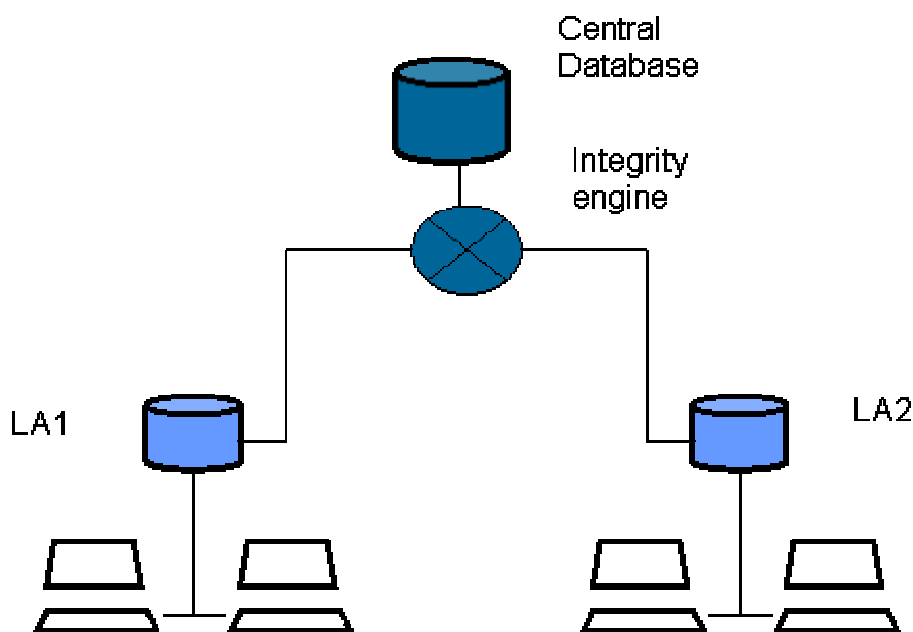
Central Data Warehouse Distributed Transaction Model

Model 4 – Central Integrity Reporting Repository model

Unlike option 3 which only captures messages sent between LAs, the **Central Integrity Reporting Repository** checks for integrity across the distributed data system, including all LA systems and a central registration reporting data warehouse. By holding a subset of the voter registration data held in LAs and comparing it against transactions made in LAs, the **Central Integrity Reporting Repository** produces reports that identify potential validation or data integrity issues in LA databases. For example, if multiple LAs provide data that a voter is registered, the reporting repository would provide the LAs with a report of the potential duplication. The LA personnel would use the report and work together to resolve the discrepancy. For example, if a registering elector's details share sufficient similarity to an elector already registered in another locality, the **Central Integrity Reporting Repository** would upload the information and either provide a warning if the elector is supposedly registering for the first time or trigger a message to the old LA that the voter is now registered in a different LA.

Crucially, although the **Centralised Integrity Reporting Repository** stores all data provided by the LA systems it does not enforce data integrity rules at the LA database level. As such, the data that has been provided to the **Central Integrity Reporting Repository** does not become official data of record for registration information. This remains in the LA databases as resolution of discrepancies is at their discretion. There does not, therefore, need be a “real-time” connection between the LA systems and central registration reporting database. This could be done using some kind of batch system, from daily dial-ups to weekly DVDs.

The **Central Integrity Reporting Repository** is the first solution in which national access is granted. It should be stressed, however, that national access would not be to a database with complete integrity as not all discrepancies will necessarily have been resolved.



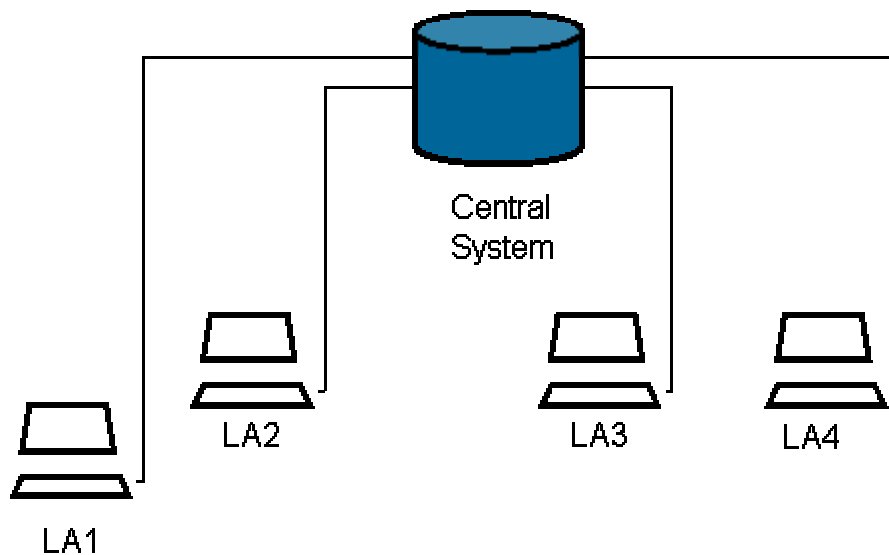
Central Integrity Reporting Repository Model

Model 5 – Central Registry

The **Central Registry** is characterised by the creation of a centralised registration database that becomes the single source of information about the official registry status of an individual. In this solution, the Central Registry enforces integrity and only accepts data from LA systems once discrepancies are resolved. Although the LA systems continue to perform transactions, they are constantly connected to the **Central Registry** so that discrepancies can immediately be flagged for resolution. In the previous example of a registering elector that is similar to an elector already registered in another LA, the **Central Registry** immediately notifies the staff in relevant LAs and does not permit the transaction until the discrepancy is resolved.

Model 6 – Central System

The **Central System** is characterised by a single central Government registration system that maintains registration data stored in a central database. Under the central system model all LAs connect to the **Central System** and access their registration data via the central database - in effect the LAs just house 'dumb terminals' connected to the Central database. The **Central System** provides consistency in data validation, data integrity, and registration processes at the national level.



Central System Model

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