

## Electoral Registration: Students

### Purpose

1. Following discussion of Paper LGBCS 2499 (Electoral Arrangements – 2019 Interim Reviews) at its meeting of 11 September 2019, the Commission agreed not to proceed with interim reviews of electoral arrangements at this time. The Commission noted the particular issue of voter registration in areas of high student density as well as the potential difficulties of the register capturing those in transient groups such as students, those who rent their accommodation (particularly on short term leases) and those who travel frequently. This issue had been highlighted since the introduction of IER (Individual Electoral Registration) in 2014. The Commission agreed that this was a possible factor in the high variation from electoral parity seen in Fife ward 18 (St Andrews) and possibly City of Edinburgh ward 11 (City Centre) among others.
2. This paper further considers the issues identified by the Commission.

### Background

3. Regarding the introduction of IER, [www.gov.uk](http://www.gov.uk) states:

“The electoral register has been around since 1832. The old system required a ‘head of household’ to submit an application on behalf of all those resident at an address – an outdated concept not recognised by many in today’s world. In 2014 we replaced this system with Individual Electoral Registration (IER), to improve the accuracy of the register and to make registration easier and more secure. We also introduced a new online application process, making it fit for the 21st century.”

Effectively this placed the responsibility on the individual voter to “opt-in” to ensure their details are on the electoral register and was introduced to “improve the take up rate of electoral registration and reduce fraud”.

4. As an example of changes to electorates since IER was introduced, Fife Council’s St Andrews ward electorate, as a % of the ward’s population, has dropped from 80% in 2011 to 50% in 2018. Over that time the population has increased by approximately 1,600 (NRS Mid-2018 Population Estimates Scotland) but the number of registered electors has dropped by approximately 5,000. Theoretically there is the possibility that those 5,000 have decided to register at home somewhere else in Scotland or the UK, but it does perhaps indicate the large changes in ward electorates brought about since IER’s introduction in 2014 (See graph at Appendix A).

5. One source of data that offers further insight as to the distribution of the student population is a council's "occupied exemptions" which are published by NRS. Most of the properties listed as exemptions from council tax are all-student households, though other types of occupied dwellings are also included in this category, such as armed forces accommodation. In 2018, a total of 3.1% of dwellings in Scotland were occupied but exempt from paying Council Tax. The proportion of occupied dwellings that are exempt from Council Tax tends to be highest in the council areas which have major universities, and therefore large student populations. They also tend to be quite concentrated within certain parts of these council areas close to university campuses. The attached "heat map" at Appendix B shows the concentration of these occupied exemptions across some of the council areas that have large student populations.
6. Electoral administrators have suggested that registers tend to start low at the beginning of a year and the register can be seen to peak as registrations pick up in the lead up to major electoral events. The most recent example was the European Elections in May 2019 (see Appendix C for details of Fife electorate). In September 2019 the Guardian newspaper reported that 100,000 people across the UK had registered to vote as it appeared likely at that time that a general election may occur.
7. In 2015, Universities UK – a representative body for over 130 universities – commissioned a report that provided an overview of the range of activities being undertaken in a number of UK universities to ensure students are on the electoral register, with a particular focus on an initiative in Sheffield to integrate voter registration with the start of term registration process for students. The issues highlighted by respondents as barriers to registration included:
  - Data protection – or concerns about data protection and need for more information about best practice and how to satisfy legal protection and duty of care issues;
  - Technological/IT barriers to overcome;
  - Dealing with multiple local authorities adding complexity;
  - Concern about the number of things universities ask students to do at the start of term – some of which are more urgent (e.g. visa renewals, GP registration, student funding applications, disability support assessments);
  - Students not knowing their National Insurance numbers slowing down or halting the registration process;
  - Students not knowing who is eligible to vote or where they could register to vote;
  - Student disinterest (in registration/political process); and
  - Voter registration campaigns seen by some as being too party political.
8. The Electoral Commission produces reports on the accuracy and completeness of the electoral registers, and also assess how these change

in response to legislative developments and also administrative and population changes. The results for Great Britain in December 2018 show that:

- Parliamentary registers were 85% complete and 89% accurate
  - Local government registers were 83% complete and 89% accurate.
9. The findings of the report lead to two main estimates:
- there were between 4.7 and 5.6 million inaccurate entries on the local government register
  - between 8.3 and 9.4 million people in Great Britain who were eligible to be on the local government registers were not correctly registered.
10. The 2015 Electoral Register report (the first to fully consider the influence of the introduction of IER) made several mentions of the impact of registration changes to students “some EROs also did not complete their canvassing activities ahead of the publication of the registers in December 2015. This was entirely legal and was in most cases a response to some specific challenges posed by IER such as beginning to contact students when their term begins. This allowed EROs with a high concentration of young and mobile people to wait until residents have settled following a change of address (generally during summer and early autumn, particularly for students) before contacting certain households. If this approach continues, which seems likely, it undermines the previously accepted nature of the 1 December registers as the fully revised, most accurate and complete, registers each year. In addition to this there appear to be other changes related to the timing of significant registration activity which also call the significance attached to 1 December into question.”

### **Steps being taken by organisations to improve student registration and other registration issues**

11. A number of organisations are addressing student registration and some examples of initiatives being pursued are set out below.
12. The Universities UK report holds Sheffield University’s approach to student registration as an exemplar of an approach that supports increased levels of student registration. Initiatives in Sheffield to fully integrate voter registration with student enrolment have attracted the attention of media, government and the university sector. It has been reported that a number of universities have included a link to the gov.uk online registration as part of their online enrolment, however this would take students outside of the university system and with no way to check whether students had indeed completed the actions required.

13. The 'Sheffield model' offers full integration within the University of Sheffield's online registration system, with students being asked to submit information via a single online form for both university registration and voter registration. With the information included in one place – rather than taking students out of the university site to an external site – it was more likely that students would complete this section as part of their registration process and it was agreed that the start of term was the optimum time to do this. The biggest obstacle to overcome – and an issue which most other universities mentioned – is the issue of data protection.
14. Registration with the Office for Students requires English higher education (HE) providers to take steps to facilitate the electoral registration of students. To register students to vote, institutions need to liaise with the electoral registrars where their students live. This can be complex for individual institutions to administer, particularly when multiple electoral registrars are involved. Developed in consultation with the Academic Registrars Council (ARC) and the Association of Heads of University Administration (AHUA), JISC offer a shared service to provide a simple way for students to register to vote and help organisations achieve compliance with the Office of Students' requirements in a potentially easy and cost-effective way. It is too early at this stage to assess the impact of this service.
15. In September 2019 the Electoral Commission and the NUS released a toolkit across the UK entitled "Got 5?" with the purpose of stimulating registration uptake amongst the student population as they register at university.

### Discussion and next steps

16. There is no requirement for the Commission to take any action at this stage. However, it may wish to consider:
  - In reviewing electoral arrangements the Commission can take only account of registered electors and 5 year forecasts for the purposes of ward design and ensuring parity. The methodology for councillor numbers established in the 5<sup>th</sup> Reviews included population measures, along with SIMD data, for the purposes of categorising councils. In future the Commission may wish to consider whether in determining councillor numbers it wishes to specifically consider under-registered groups in any way.
  - LGBCE's guidance on electorate forecasts sets out:

“Students: When someone studies away from home, they are eligible to vote in local government elections both in their town of origin and also the town where they reside as a student. Where a local authority has within its area, a higher education

institution which attracts a large number of students from outside of its area, the impact on the overall electoral roll can be significant. The number can fluctuate dramatically however, dependent on the vigour with which electoral registration campaigns are conducted. Authorities presenting methodologies to the Commission should set out the considerations they have made with regard to student sections of their population.”

The Commission may wish to consider similar requests to local authorities when preparing forecasts. An analysis of historic trends in wards with high student populations may be useful in ensuring forecasts are more accurate and not skewed by unusually high or low electoral registration at any particular time.

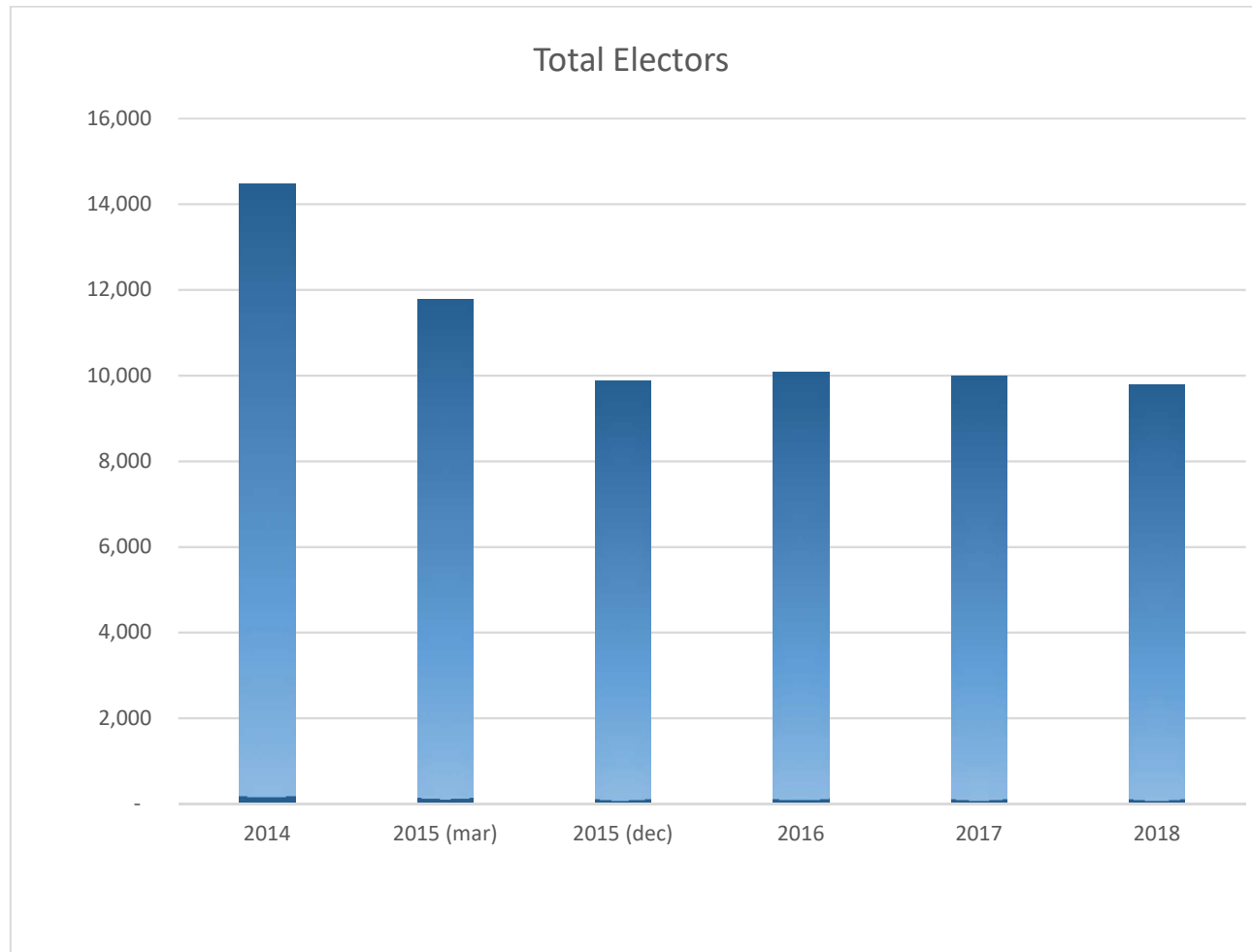
- The UK Commissions’ meeting in London in November will provide an opportunity to discuss registration issues with LGBCS and others.

### **Recommendations**

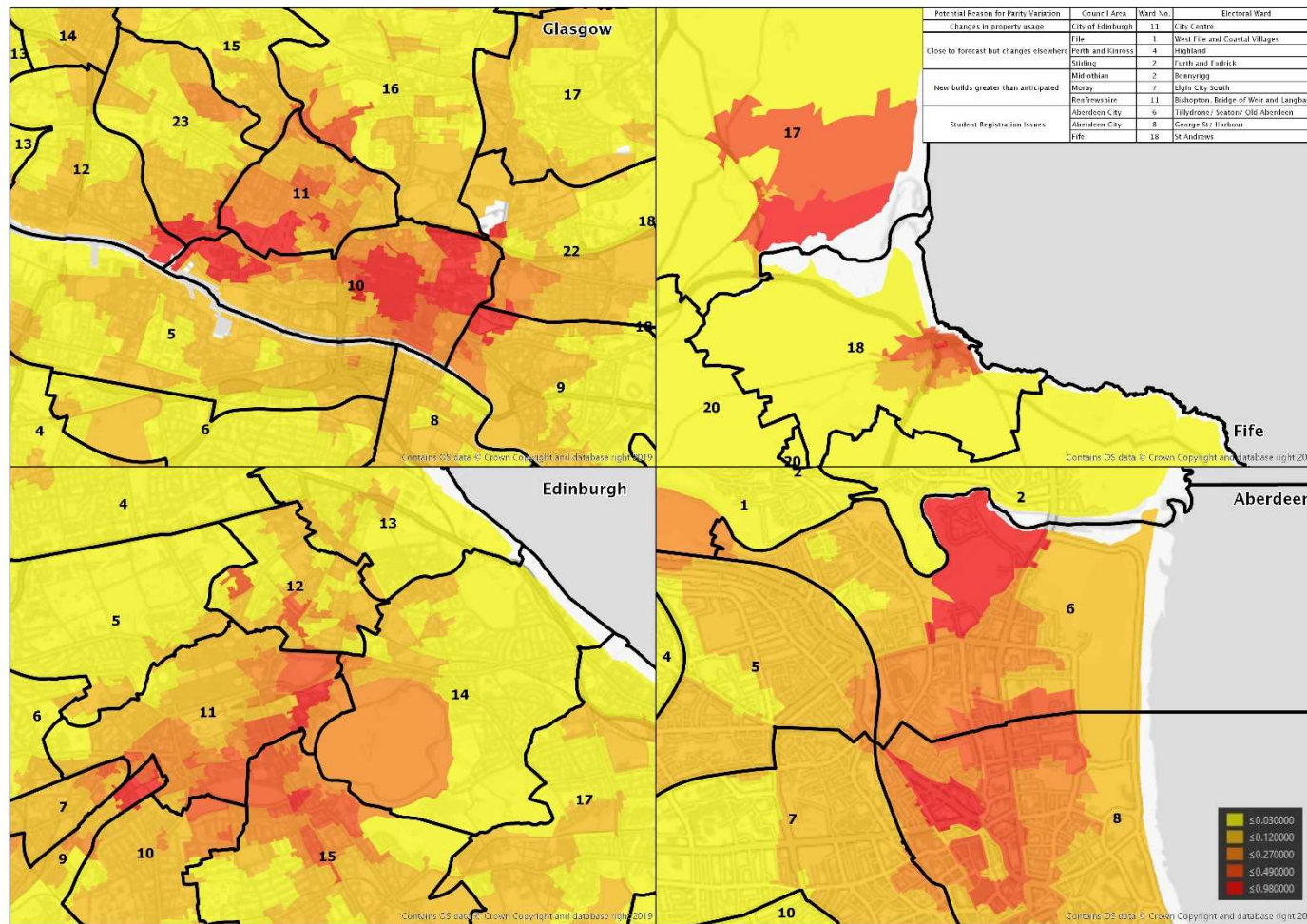
17. The Secretariat recommends that the Commission:

- Consider the information in this paper
- Decide if it wishes any further work to be done on this issue at this point in time
- Raise the question of registration issues with the other UK commissions in November
- Consider this issue for discussion with stakeholders when planning any work on its proposed strategy seminars (see Paper LGBCS 2505)

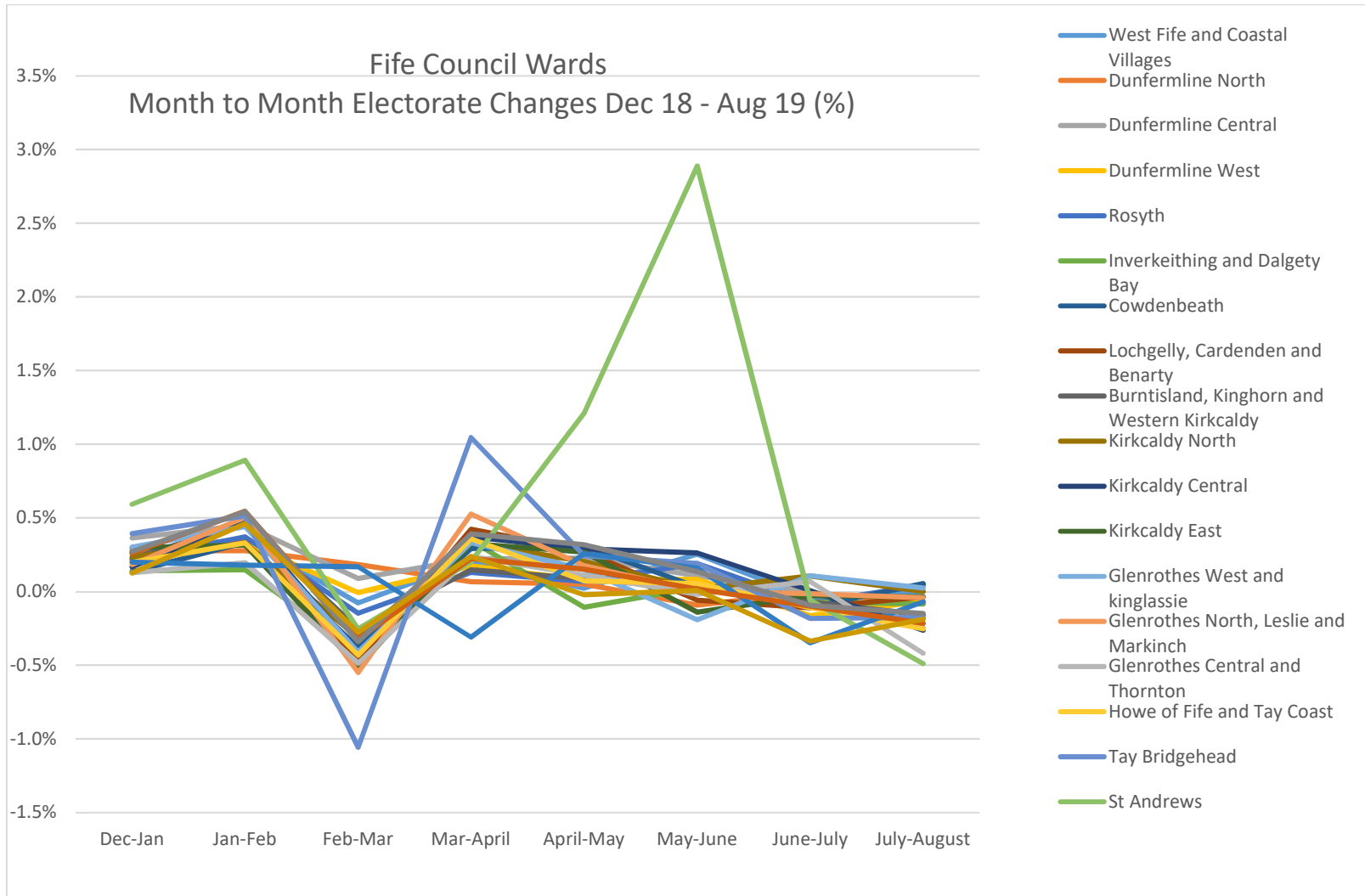
**Secretariat  
October 2019**



APPENDIX A  
Fife Ward 18 - St Andrews



APPENDIX B  
Map showing concentration of occupied exemptions from council tax



APPENDIX C

Data taken from LGBCS electoral data supplied by EROs