

# Wolverhampton City Council

## OPEN INFORMATION ITEM

Committee / Panel **CONFIDENT CAPABLE COUNCIL SCRUTINY PANEL**

Date: **20 JUNE 2013**

Originating Service Group(s) **CHIEF EXECUTIVE/DELIVERY**

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Title/Subject Matter **INTRODUCTION OF INDIVIDUAL ELECTORAL  
REGISTRATION (IER)**

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### RECOMMENDATION

That the Panel consider the information report submitted to Cabinet on 22 May 2013 and comment on it, agreeing to receive a further report following the publication of secondary legislation.

## **INTRODUCTION OF INDIVIDUAL ELECTORAL REGISTRATION (IER)**

### **1. Purpose of Report**

- 1.1 This report updates the Cabinet on the progress with the move to Individual Electoral Registration in 2014. It provides details of the current proposals for registration processes for local authorities and proposals for funding the transition stage. Some of these processes are awaiting Secondary legislation and may change.

### **2. Background**

- 2.1 The Electoral Registration and Administration Bill 2013 received Royal Assent on 31 January 2013.
- 2.2 The Cabinet Office has been working with the IER Implementation Panel to look at the practicalities of the implementation. An expert panel was appointed by the Cabinet Office approximately two years ago to help shape the process for IER and ensure practical issues are not overlooked. The panel consists of a number of experienced electoral administrators and electoral registration officers.
- 2.3 A simple timetable of IER events for the next two years is set out at Appendix 1, and a copy of detailed information relating to the process is set out at Appendix 2.

### **3. IER Transition and Process**

- 3.1 **Individual Electoral Registration (IER)** is where electors will be required to register individually rather than by household. During transition we will try to match all existing electors with information held by the Department for Work and Pensions (DWP) on its Customer Information System. If the information is matched the entry on the register will be confirmed and the elector will be told that they need to take no further action. It is anticipated that around 80% of electors will be confirmed this way based on evidence from pilots conducted during 2011 and 2012. After a dry run exercise has been conducted in July this year the authority will have a better understanding of the level of match that is likely to be achieved.
- 3.2 In summer 2014, the Electoral Registration Officer (ERO) will individually invite people who have not been confirmed, together with any other person the ERO may think is eligible, to register under the new system. Where the ERO does not hold any information on residents for a property or there is some doubt about who lives at an address a Household Enquiry Form (HEF) will be sent to obtain details of all people living at an address and then individual invites will be sent.
- 3.3 ERO's are required to conduct an annual canvass of all households within a borough to update the Electoral Register for publication on the 1<sup>st</sup> working day of December each year. In order to ensure that the register is as accurate as possible prior to the confirmation exercise being carried out in July 2014, the annual canvass will this year will take place from October 2013 with the register republished on 17 February 2014.

3.4 One of the main changes being introduced under IER is the facility for electors to be able to register online as well as by submitting a form to the ERO.

3.5 **Preparations March – August 2013**

Detailed below is the planned preparative work:

- Review and implement guidance from the Electoral Commission and Cabinet Office.
- Liaison with Electoral Management Software (EMS) supplier to ensure system enhancements are carried out to enable IER that the necessary enhancements are in place for the confirmation dry run in July 2013.
- Work with Cabinet Office and supplier to ensure connectivity to Digital Services.
- Report on going progress on implementation activity to Cabinet Office
- Work with Cabinet Office, Regional Development Managers and County leads to flag any issues around implementation.
- Conduct 'dry run' confirmation exercise to ensure functionality of systems and connections with IER Digital Service.
- Work with internal teams such as ICT and Communications and, where appropriate, working with other authorities across the county, to deliver the change.

3.6 **IT infrastructure and management process:** Guidance will be issued by the Cabinet Office and there is an 'effectiveness monitoring mechanism' which will focus on:

- IT hardware and software roll out.
- Resources, capability and capacity.
- Wider business engagement, including business support and customer services.
- Supplier engagement, including EMS and print suppliers.
- Funding.

3.7 The effectiveness monitoring mechanism is going to be used to assess implementation progress on IER activities from April 2013 and from the overall readiness assessment in November 2013.

3.8 **Training:** The Cabinet Office will be responsible for ensuring that electoral administration staff are fully trained to manage the transition to IER. As part of this Cabinet Office is currently assessing the training requirement and the options for how this is best met. Training is scheduled to take place between January and March 2014

3.9 **Refining Plans September 2013 to June 2014:** The ERO will be required to develop a single integrated public engagement strategy for the local authority, building on our plans for successful transition including:

- Identifying new electors.
- Publishing the revised register.
- Identifying target audiences using local public engagement activity.

- Developing public awareness and registration contact methods.
  - Ensuring necessary connectivity's and packages are in place as per Cabinet Office requirements.
- 3.10 The Electoral Commission will provide implementation guidance from September 2013 which will include a set of messages from the Electoral Commission for EROs to use in communication with the public. This will have been developed through testing with the public to ensure they are effective in encouraging people to take the required action and clear in conveying information about IER. They will include messages to use in local public awareness advertising, messages to use during the write-out and lines that can be used in response to queries from the public.
- 3.11 Other guidance that will be provided at the time will provide support to EROs on the activities which need to be undertaken from July 2014 until the May 2015 polls which will include:
- Planning for and administering the proposed check of existing entries on electoral registers against the DWP database from June 2014 onwards, and the process for retaining confirmed entries on the register.
  - Planning for following up those electors who have not been confirmed, including implementing our engagement strategy to most effectively target these electors.
  - Planning for and administering the process for issuing individual invitations to register and household enquiry forms including undertaking follow up activity to elicit response during autumn 2014.
  - Determining new applications this will require more detailed guidance to reflect the guidance of the Secretary of State.
  - Planning for and administering additional registration activity in the spring of 2015.
- 3.12 The Electoral Commission will be developing performance standards to support EROs by identifying the behaviours necessary for the effective preparation for and implementation of IER.

#### **4. Funding**

- 4.1 The Government has committed £108.3 million to fund the transition to IER and has committed to funding any additional costs of IER post-transition.
- 4.2 The Government has stated that they propose to distribute the funding throughout the year, rather than with the rest of the annual formula grant. This will be by grants under Section 31 of the Local Government Act 2003. In England and Wales Section 31 grant is intended to be supplementary funding to cover only the net additional cost of the new responsibilities arising from the Electoral Registration and Administration Bill and that consequently it is not intended solely to replace the usual level of funding of registration to meet the duties arising from the Representation of the People Act 1983 (as amended) which it is intended will be met from local authority budgets in the usual way. It is anticipated that payment will be paid by upfront grants.

4.3 Section 151 Officers were asked to sign a “declaration” to give assurance that the division of responsibility for funding the new duties under the Electoral Registration and Administration Bill is fully understood, given the additional net costs will be met by Cabinet Office, but current funding in formula grant will need to be used to meet the current level of costs. This declaration will therefore enable Cabinet Office to effectively decrease audit burdens, by providing 70% of canvass funding for the transitional year of 2014/15 as an upfront grant and only retaining 30% for release later in the year.

4.4 Detailed below are the current funding proposals:

Transitional activity 2013 / 14	Allocation mechanism	Funding Formula
Testing confirmation	Up front grant	Flat rate
Change implementation – staff costs	Up front grant	Flat rate
Changes to Local Authority IT/ EMS system	Retrospective grant	Individual need
Training	Up front grant	Team size

Transitional activity 2014/15	Allocation mechanism	Funding Formula
Implementing confirmation	Up front grant	Flat rate
Transitional canvass costs	Upfront grant	Pinned to local characteristics
Digital changes to LA IT systems / enhancements	Retrospective grants	Individual need
Training	Up front grant	Team size
Local publicity costs (public awareness)	Retrospective grant	Individual need
Additional rolling registration costs	Up front grant	Pinned to local characteristics
Change implementation staff costs	Up front grant	Pinned to local characteristics

4.5 Initial funding details issued 26 March 2013 are as follows:

- £6,254.83 to cover additional costs of change, including, but not limited to, change management, IT testing, engagement with the Cabinet Office and attendance at workshops during the transition.
- £3,948.28 to cover cost of confirmation dry run in July 2013.

## 5. Conclusion

5.1 The final detail of this area of work is not yet set but the Council now has an overall understanding of the work which will be required to ensure successful implementation of this change.

5.2 A communications strategy will be developed that supports the national campaign.

## **6. Financial Implications**

- 6.1 The transition from the current household registration system for electors to Individual Electoral Registration (IER) is the most significant change to our system of electoral registration for many years. The Government has announced that it is committed to funding the full cost of the transition to IER, over and above the current cost of electoral registration. This will be through a range of grants underpinned by various funding formulas as detailed in Section 4. The grants will be paid either up front or retrospectively. The actual costs incurred and funding received will be detailed in future reports to councillors. [GE/08052013/A]

## **7. Legal Implications**

- 7.1 There are no direct legal implications arising from this report. [MW/02052013/K]

## **8. Equal Opportunities Implications**

- 8.1 An equality analysis will be conducted and typically unregistered groups will be identified and targeted as part of the public awareness strategy being produced by the Electoral Commission and the Council's Electoral Registration Services.

## **9. Environmental Implications**

- 9.1 There are no direct environmental implications to this report.

## Appendix 1

### Timetable of Events for Individual Electoral Registration

<b>Year</b>	<b>Months</b>	<b>Event/Process</b>	<b>Comments</b>
2013	Jan - Feb	Postal Vote Identifier Refresh	Annual process to write to all postal voters whose identifier is 5 years old.
2013	March	Grant allocations made by Cabinet Office (CO) for first year of transitional activity (2013-14).	
2013	April	Electoral Commission (EC) to start formal consultation with EROs, electoral services managers and other interested local authority staff and key stakeholders on a revised performance standards framework for the transition to IER	
2013	April	Grant monies to be paid to EROs by CO	
2013	From April	CO to commence monitoring of ERO progress with implementation preparation activities	Start of monthly monitoring, reports submitted every month to CO
2013	April – June	Roll-out and testing of EMS enhancements to support the confirmation dry-run	Election Management System (EMS) changes from suppliers
2013	June	EC to issue guidance on planning for the transition	
2013	Jul - Aug	A 'dry-run' of data-matching process to test the IT and process within each LA and draw out learning points, supported by CO	This is to establish the percentage match rate that could be achieved matching electors who are already registered.
2013	September	Guidance and performance standards on the activities EROs will need to undertake from July 2014 until the May 2015 polls available from the EC Guidance on IT infrastructure available from the CO	Documents and Guidance Issued
2013	Sept - Oct	Potential reschedule of 2014 Postal Vote Identifier refresh	
2013 - 2014	Oct - Feb	EROs to conduct delayed 2013 canvass	
2013	November	EROs assessed for readiness to go live by the CO.	Final assessment
2014	Jan/Feb	Send out and chase return of UC1 forms	Electors from European countries that wish to vote at the European Election in the UK are required to complete a UC1 form.
2014	17 Feb	Publication of revised register	
2014	1 May (date to be confirmed)	Local elections in parts of England (if not moved to be combined with the poll at the European Parliamentary elections)	Local elections are scheduled for 1 May
2014	22 May (date to be confirmed)	European Parliamentary elections (EC undertaking awareness campaign to encourage registration)	European elections will take place on 22 May 2014 TBC

2014	10 June	IER goes live; new applicants will be registered under IER.	EC Public awareness campaign goes live across England in time to support the write-out and other registration activity undertaken by EROs
2014	July – Sept	Confirmation of existing electors with DWP database to enable registration under IER	EROs write-out to those on the final pre-IER register to assure them that they are confirmed as registered under the new system, or to invite them to supply their personal identifiers
2014	July	Verification of electors for registration under IER	This is part of the daily process when handling IER registration forms
2014	Sept - Oct	Postal Vote Identifier refresh	Annual process to write to all postal voters whose identifier is 5 years old.
2014	Sept – Nov	Send out and chase household enquiry forms (HEF)	These forms are to establish who resides at a property so IER forms can be sent
2014	Sept	Send out and chase IER forms	This is the start of a continual daily process
2014/2015	Nov – Jan	Carry over process	Establish where electors have not responded are they still resident and should be carried over
2014	By 1 December	Publication of the revised register	
2015	April	Registration deadline for voting in the upcoming elections	
2015	7 May	UK Parliamentary general election and English local elections	
2015	Jul – Aug	Send out HEF forms to all properties	This will confirm the details of who is currently registered and identify new electors.
2015	July – Nov	Household canvass	
2015	August	Deadline for Government to lay an Order before Parliament that transition will conclude in 2015.	If no Order is laid, transition will extend to 2016.
2015	November	EC public awareness activity	Across England in the run-up to the end of the 2015 annual canvass this activity will inform people that they need to register or submit personal identifiers to remain registered.
2015	Nov	Delete all 2014 carry forwards	Individuals carried forward from 1 December 2014 register and not submitted personal identifiers or not successfully passed through confirmation data match will be removed from the register (or 2016 if government does not utilise power to complete transition in 2015).
2015	By 1 December	IER register published	



## Appendix 2

Based on Information, slides and documents produced by the Cabinet Office (CO) and Association of Electoral Administrators (AEA)

Wolverhampton  
City Council



# Preparing for Individual Registration (IER)

David Garner

Senior Elections & Electoral Registration Officer



# Our Aim

- To inform Members of the progress made by Electoral Registration Transformation Programme (ERTP), Cabinet Office (CO) and WCC ERO
- CO provided ***detailed insight into their decisions regarding the IER process and transition***
- CO provided information for electoral administrators and ERO's to begin planning for the transition and adoption of IER

# Update on Legislation

- The Electoral Registration and Administration Act 2013 received Royal Assent on 31 January 2013. The Act sets out the terms for the transition to Individual Electoral Registration which the Government is committed to introducing next year, in 2014. The Act will require Electoral Registration Officers to take a number of steps over the coming year to prepare for the implementation.
- Secondary legislation is currently being consulted on and will add the working detail to the Act.

# Key Drivers for Change

- ✓ **Tackle electoral fraud and improve the integrity of the electoral register**
- ✓ **Take steps to improve the completeness and accuracy of the electoral register**
- ✓ **More efficient delivery of electoral registration**
- ✓ **Improve public satisfaction in electoral registration**

# What is IER?

- All electors **must register individually** from 2014 and have their **application verified** before being added to the register
- People must provide **name, address, National Insurance Number** and **date of birth**. These are cross checked with DWP before names are added to the register
- Confirmation of existing electors on the register where details match with those held by DWP. Those not matched will be invited, reminded in 2014 and 2015 and have **until December 2015** to register under new system
- Requirement for **signature dropped** –opening the way for online registration. Online applications accepted across GB from 2014

# General Issues

- Registration under IER will be required if sent an invitation to register
- Current penalty for failure to respond to household canvass (HEF) will apply
- Individuals who do not respond to an invitation to register may be issued with a Civil Penalty Notice “CPN”

# Data Matching Pilots

Wolverhampton CC was involved with Pilot Schemes

- 2011 Data Matching Pilot using data from
  - Department for Work and Pensions (all Electors)
  - HM Revenues and Customs (all Electors)
  - Department for Business, Innovation and Skills (Students)
- Results showed that data matching could be used as tool to prove that electors could be confirmed, although results were difficult to quantify.

# Data Matching

- The 2011 Pilot Schemes matched with data from public authorities:
  - Department for Work and Pensions
  - Department for Transport
  - Department for Education
  - HM Revenues and Customs
  - Department for Business, Innovation and Skills
  - Ministry of Defence



# Data Matching Pilot

- More targeted pilot carried out in 2012 in order to quantify the numbers of electors that could be carried forward to the new IER system
- 2012 Data Matching Pilot used pre and Post canvass data from
  - Department for Work and Pensions (all Electors)
  - HM Revenues and Customs (all Electors)
  - The results showed that 80.45% (143385) of Wolverhampton Electors (178230) could be confirmed and would not need to go through the initial IER process
  - The match rate per ward varied between 65.5% and 87.5%
  - Elected Members: of 58 registered to vote 77.5% (45) would be confirmed. 22.5% (13) would have to use the Initial IER process to confirm registration in 2014

# Data Matching Pilot

## Electoral Commission Report (1)

### Demographic and electoral registration information

- **Demographic information**
- Population (16+) 200,047 -
- Attainers (16-17 year olds) 6,705 -
- Population aged 18-29 17.1%
- BME population 34.9%
- Full-time students 5.5%
- Private renters 13.2%
- Estimated population mobility 12.8%
- Resident in the UK for less than 2 years 1.7%
- **Electoral registration data (2012 canvass)**
- Local government register entries (October 2012) 178,287
- Canvass return rate 88.5%
- Proportion of electors retained 2.8%
- Proportion of electors carried forward 7.0%

# Data Matching Pilot

## Electoral Commission Report (2)

### Match results

<b>Overall match rates</b>	<b>Green</b>	<b>Amber</b>	<b>Red</b>
Pre-canvass	78.2%	3.0%	18.8%
Post-canvass	80.4%	3.2%	16.4%

<b>Attainers (16-17 year olds)</b>	<b>Green</b>	<b>Amber</b>	<b>Red</b>
Pre-canvass	82.7%	3.7%	13.5%
Post-canvass	83.8%	4.7%	11.5%

<b>Postal voters</b>	<b>Green</b>	<b>Amber</b>	<b>Red</b>
Pre-canvass	82.2%	2.7%	15.1%
Post-canvass	84.2%	2.8%	13.0%

<b>Ward-level variation (Pre Canvass)</b>	<b>Green</b>	<b>Amber</b>	<b>Red</b>
Highest ward Wednesfield North	85.5%	2.2%	12.3%
Lowest ward St. Peters	59.9%	4.0%	36.1%

# Data Matching Pilot

## Electoral Commission Report (3)

### Summary

- Wolverhampton's green match rates are higher than the pilot average.
- They appear to be reliable matches, with nearly 97% of pre-canvass green matches still green on the post-canvass register (the pilot total was 95.4%).
- Wolverhampton received a high green match rate despite not using UPRNs on their electoral register.
- The results for Wolverhampton indicate that the address matching algorithm works well.
- Wolverhampton's ward-level match rates show strong negative correlations with the young adult population and population mobility: wards with higher levels of population mobility and young adults tend to have lower match rates.
- In addition, Wolverhampton is the only authority where a higher BME population and population resident in the UK for less than two years show strong negative correlations with match rates. That is, wards with a higher BME population or population resident in the UK for under two years tend to have lower match rates.

# Ward Data Match Results

Post-canvass register match to DWP																
W-ton Whole		W-ton SE		Bilston E		Bilston N		Blakenhall		East Park		Ettingshall		Spring Vale		No Records sent (people)
178230		53980		9043		9066		8496		9153		8157		10065		
143385	80.45%	43950	81.42%	7464	82.54%	7734	85.31%	6387	75.18%	7592	82.95%	6474	79.37%	8299	82.45%	No people matched (green)
W-ton SW		Graiseley		Merry Hill		Park		Penn		St Peters		Tettenhall R		Tettenhall W		No Records sent (people)
61702		8296		9425		8213		10017		7440		9249		9062		
47651	77.23%	6175	74.43%	8023	85.12%	5711	69.54%	8051	80.37%	4874	65.51%	7438	80.42%	7379	81.43%	No people matched (green)
W-ton NE		Bushbury N		Bushbury S&LH		Fallings Park		Heath Town		Oxley		Wednesfield N		Wednesfield S		No Records sent (people)
62549		9063		9401		9042		8665		9064		8648		8666		
51789	82.80%	7728	85.27%	7639	81.26%	7678	84.91%	6366	73.47%	7547	83.26%	7568	87.51%	7259	83.76%	No people matched (green)

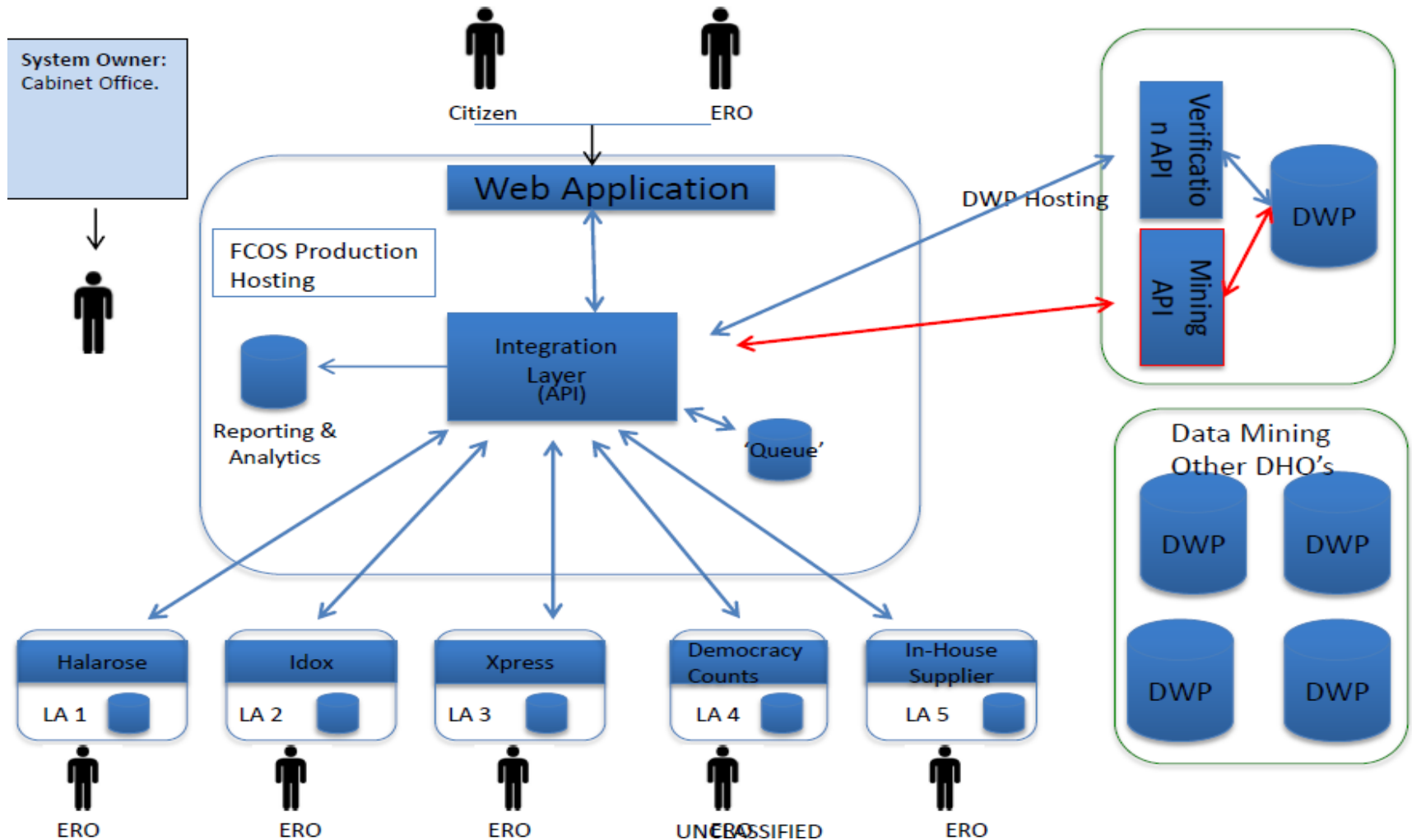
# Data Mining Pilot

- 2013 Data Mining Pilot to test other databases to see if they could identify missing electors from the electoral register
  - **Improve registration rates among home movers.** The objective will be to add recent home movers to the electoral register using data from DWP and/or Royal Mail. This work took place at the end of April and early May 2013.
  - **Improving registration rates among students.** The objective will be to add students to the electoral register using data from DWP, DfE and the Student Loans Company. This work took place at the end of April and early May 2013.

# Delayed 2013 Canvass

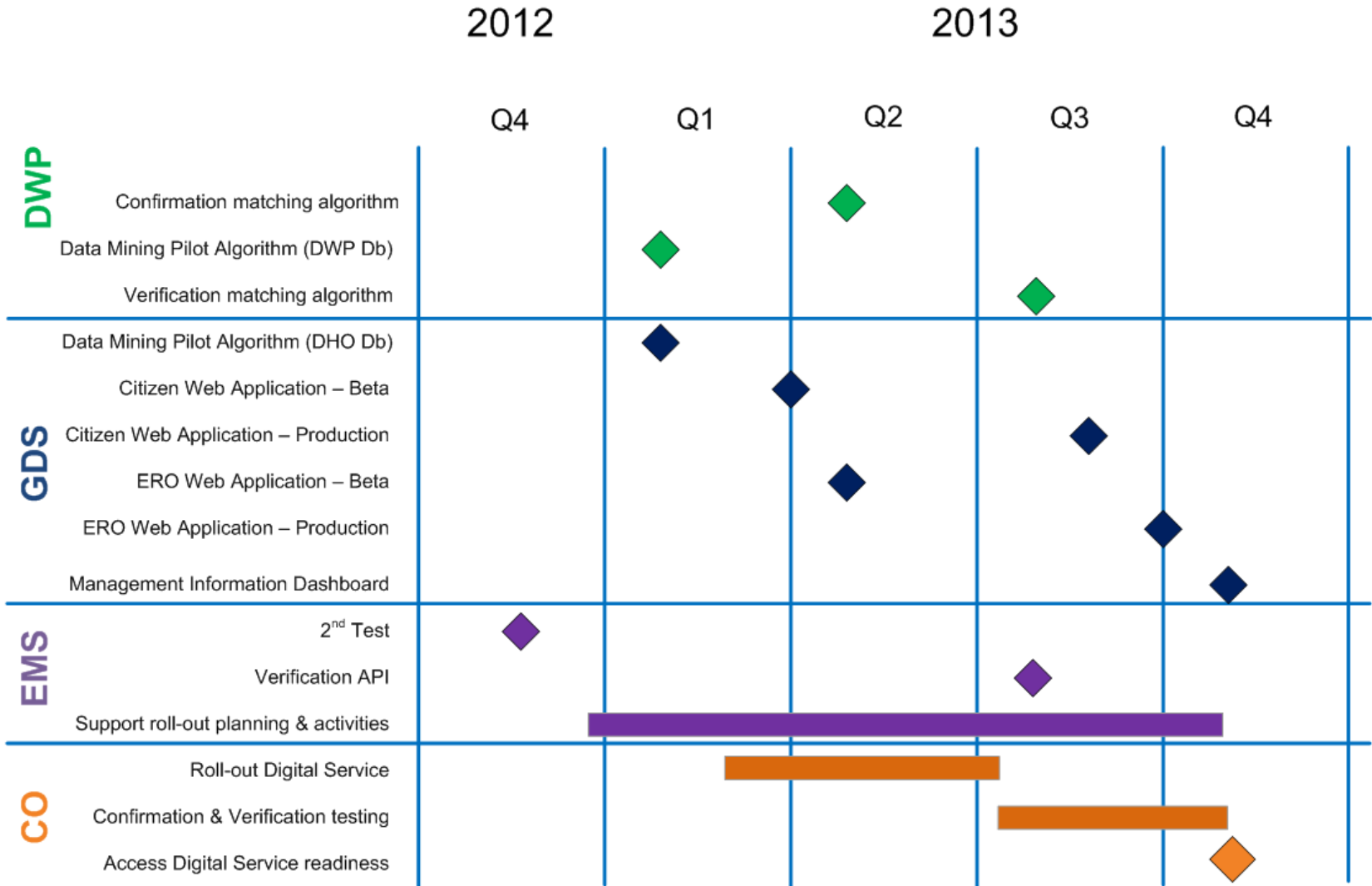
- This canvass has been planned to take place from 01 October 2013 to 17 February 2014
- This is to ensure that there is as short a time period as possible between the end of the canvass and the beginning of the confirmation period in July 2014
- This will ensure that the register is as complete as possible.

# The IER Digital Service





# IT Roll out 2013



# Summary of Funding Proposals

Transitional activity 2013 / 14	Allocation mechanism	Funding Formula
Testing confirmation	Up front grant	Flat rate
Change implementation – staff costs	Up front grant	Flat rate
Changes to Local Authority IT/ EMS system	Retrospective grant	Individual need
Training	Up front grant	Team size

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Additional rolling registration costs	Up front grant	Pinned to local characteristics
Change implementation staff costs	Up front grant	Pinned to local characteristics

# Funding: How will it be paid for?

- All additional costs arising from IER will be met
- Direct payment under Section 31 of the Local Government Act 2003
- CO will confirm the amount each local authority will receive in March 2013, when the amounts Wolverhampton CC will receive will be announced
- Final funding amounts for 2013/2014 will be determined following the confirmation dry run later this year

# Funding: How will it be paid for?

- Activities which will create additional costs will be met by top up funding to ensure that there are no net additional costs
- MfPCR - particularly keen to ensure that funds allocated to each local authority will be used for the additional activity needed to support the transition and not used to make up shortfalls in funding for electoral registration
- Upfront top up 'formulaic grants' and retrospective 'justification led' grants

# ERO Readiness

- Every ERO must be fully prepared to implement IER
- Cabinet Office (CO) is recruiting a network of Delivery Managers to help prepare and support EROs across GB to successfully deliver IER
- CO approach will also include a network of Chief Executives to drive senior level engagement across GB
- Work is ongoing on a framework to monitor ERO readiness, which will include a preparation plan and checklists to specify preparatory activities EROs will carry out from April 2013
- The checklists will allow CO to assess readiness against the preparation plan and direct support to those EROs who may need help to get back on track
- To reduce the burden on EROs, we are looking at several convenient options, including a web portal, which we would also use for key messages

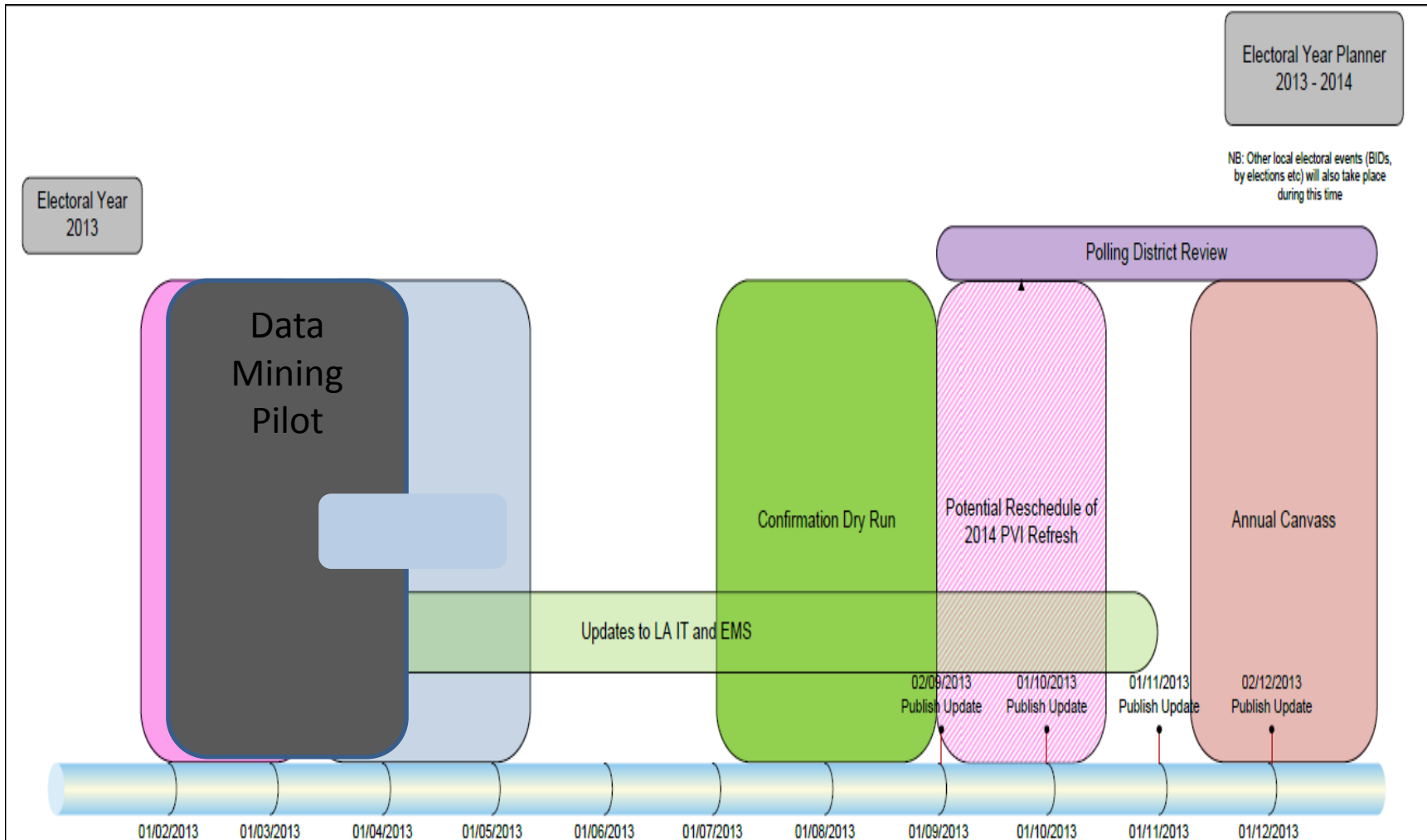
# The Process Maps

- The process maps in this presentation are the result of ERTTP's collaboration with electoral officers on secondment to Cabinet Office and in consultation with the AEA and EC
- They illustrate the work you will have to carry out during the transition to IER
- The team have worked through the proposed legislation to work out how best to turn the purpose of maintaining the completeness and accuracy of the register under IER a reality
- At this stage these maps are not definitive or prescriptive; but they should act as a planning guide

# The Process Maps

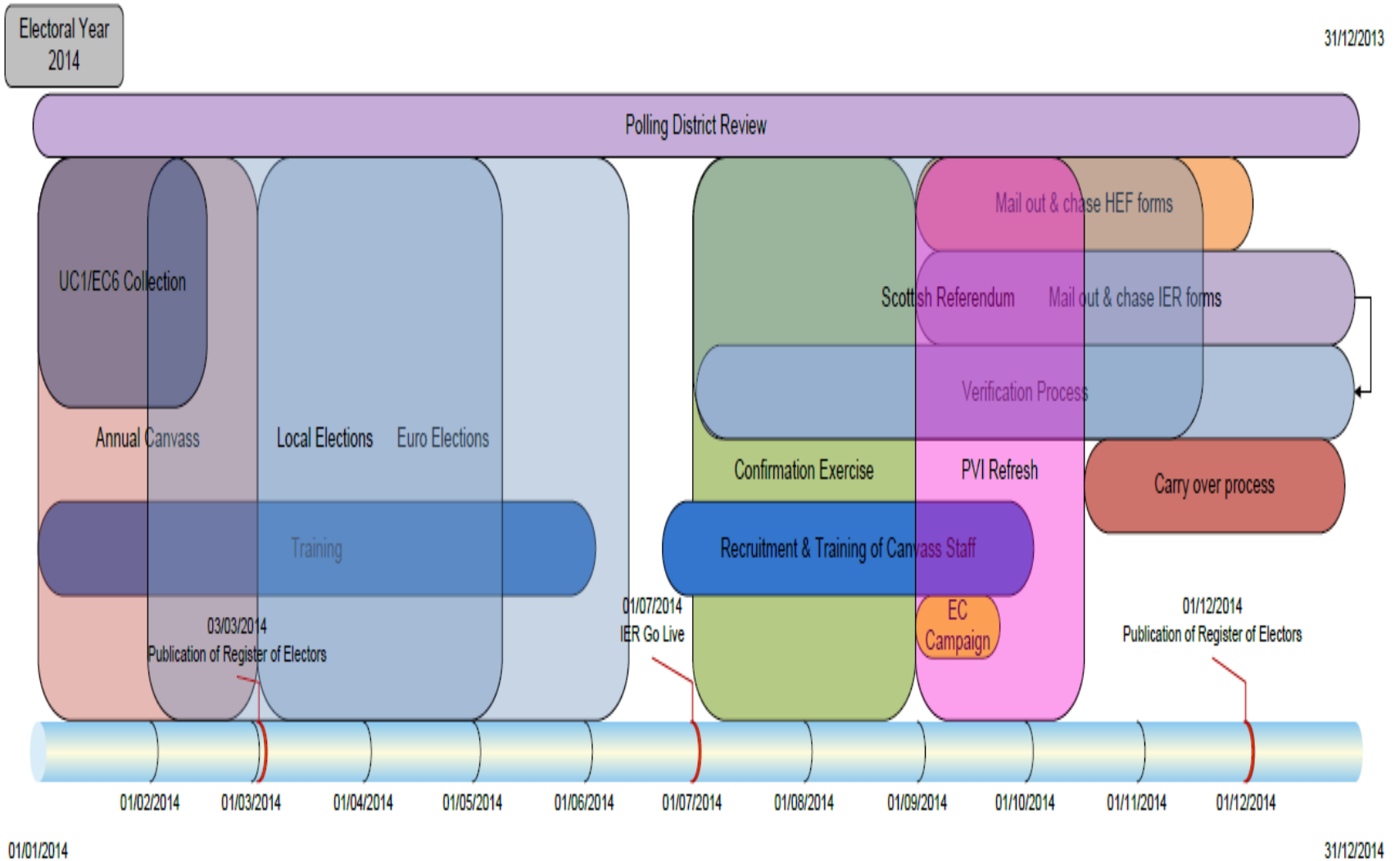
- CO understand that local circumstances require local responses, so these processes will be used to help guide the ERO in planning how IER will look for WCC
- The maps are thorough and detailed, and some aspects may look familiar
- CO have added extra layers of assurance to the already thorough journey by which ERO's currently confirm the identity and eligibility of the elector.

# ERO Work schedule: 2013

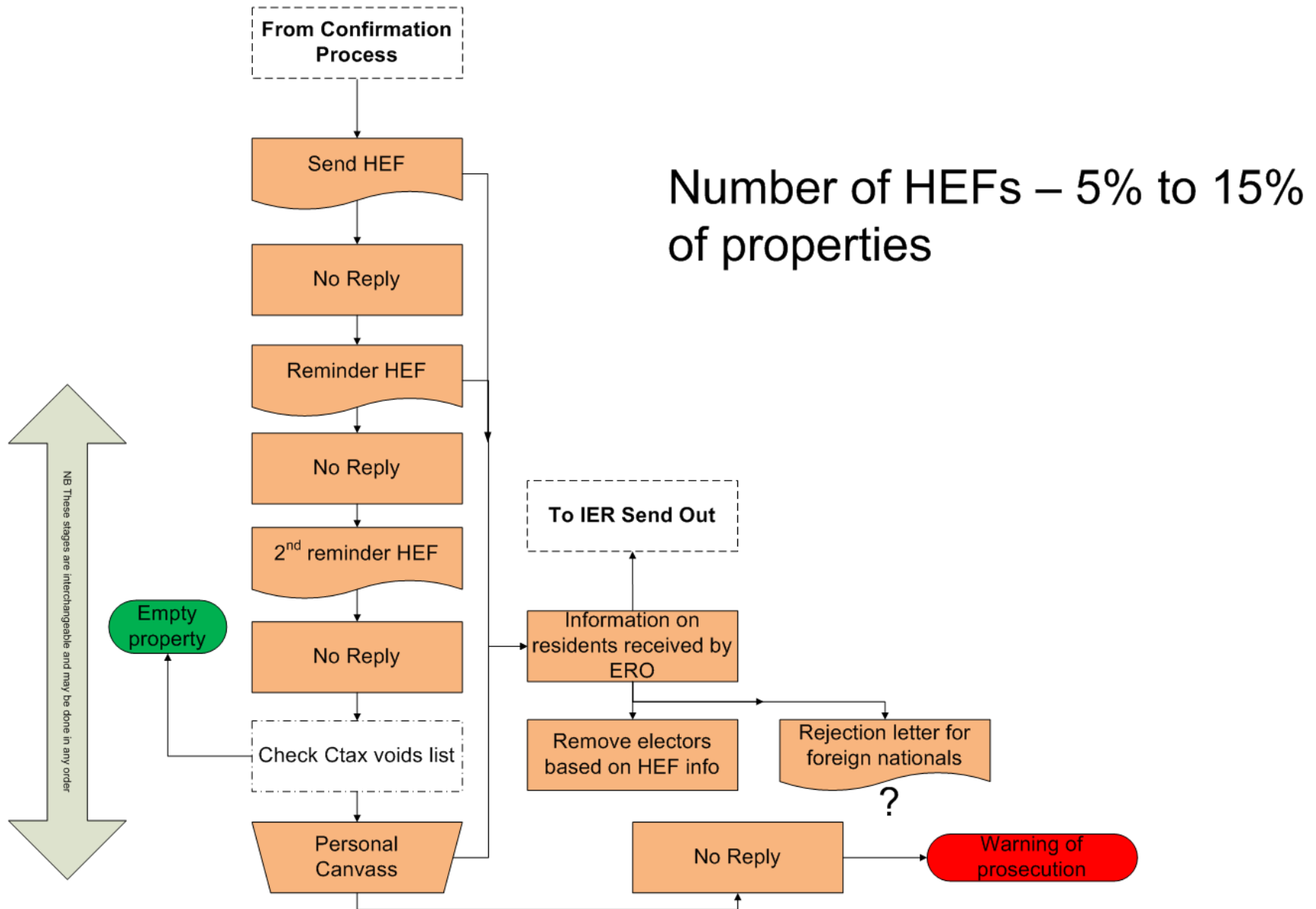




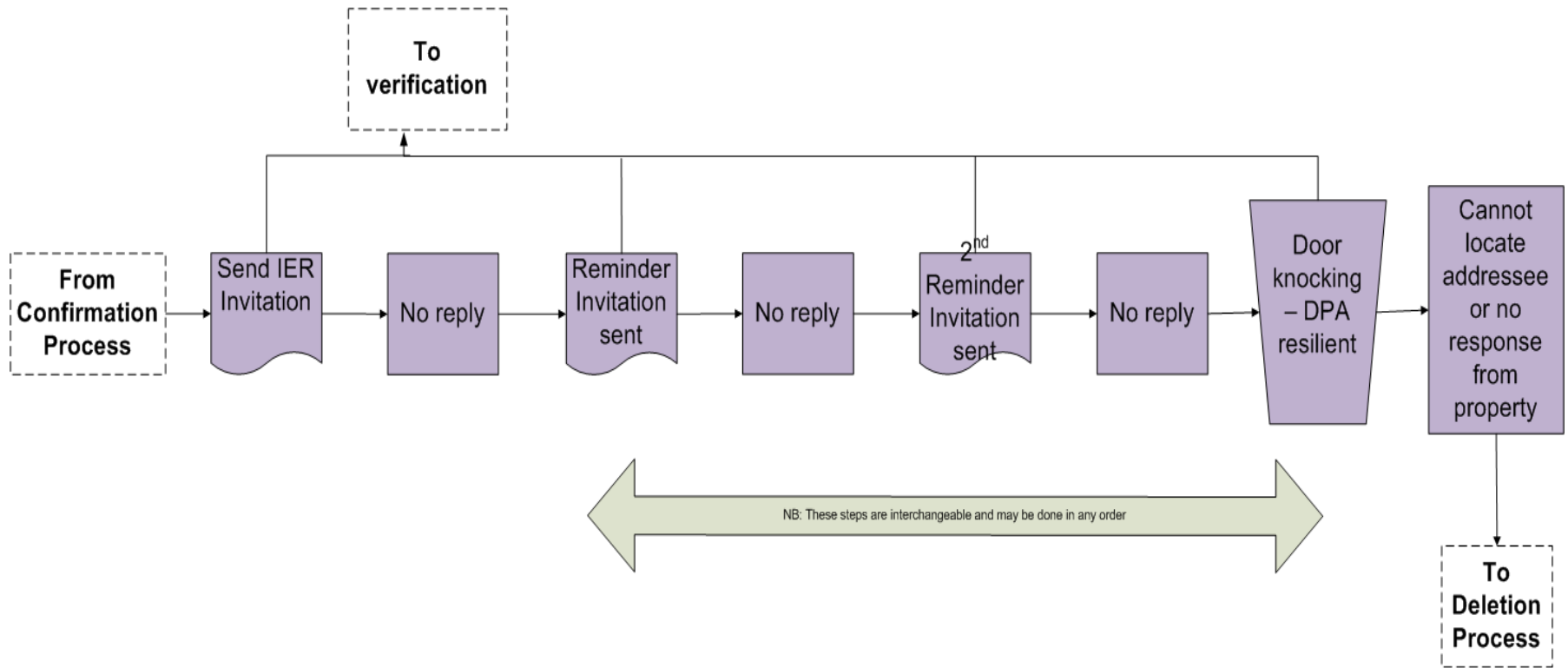
# ERO Work schedule: 2014



# HEF Chasing Process



# IER Invite Chasing Process

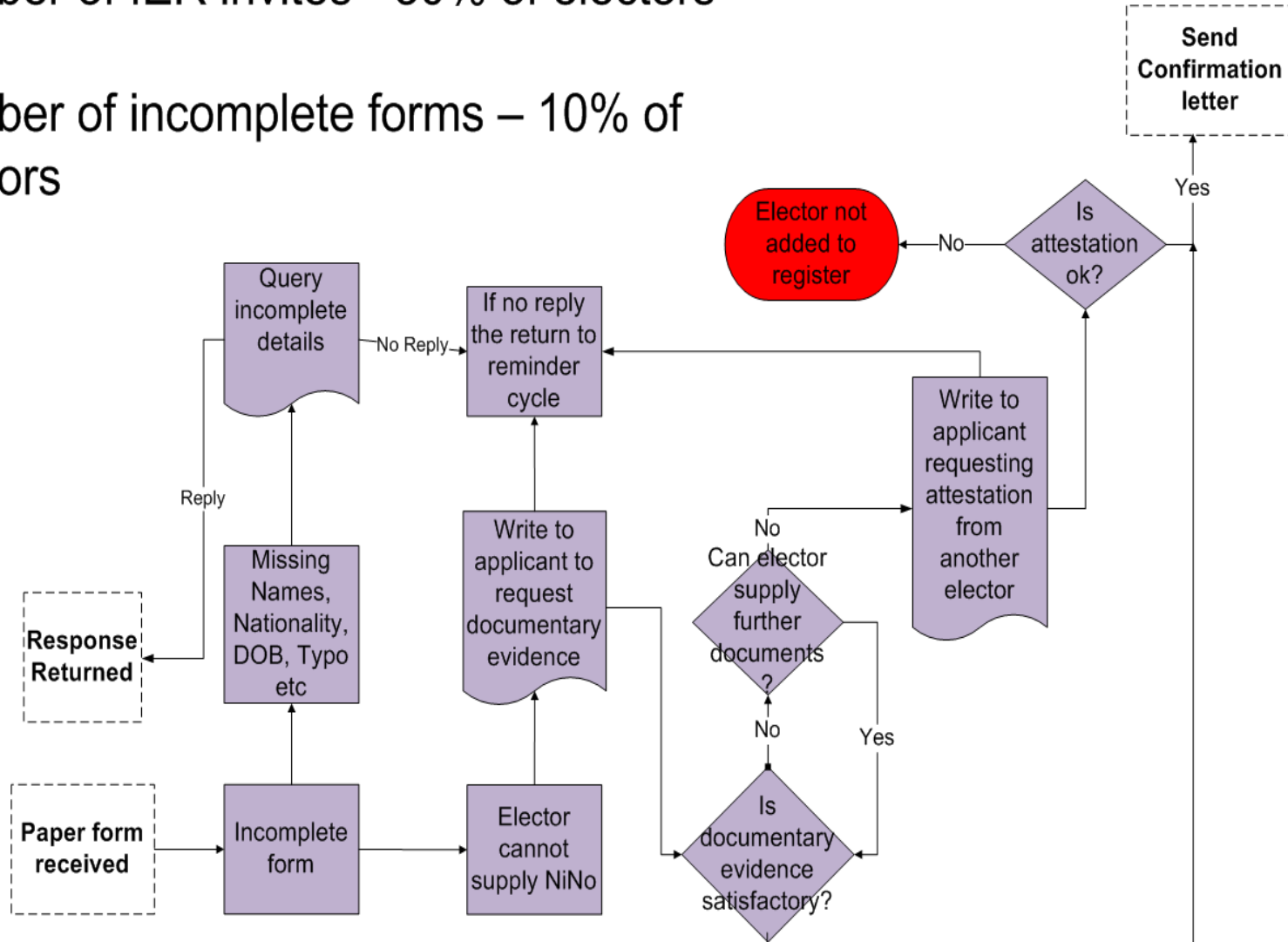


Number of IER Invites – 30%  
of electors

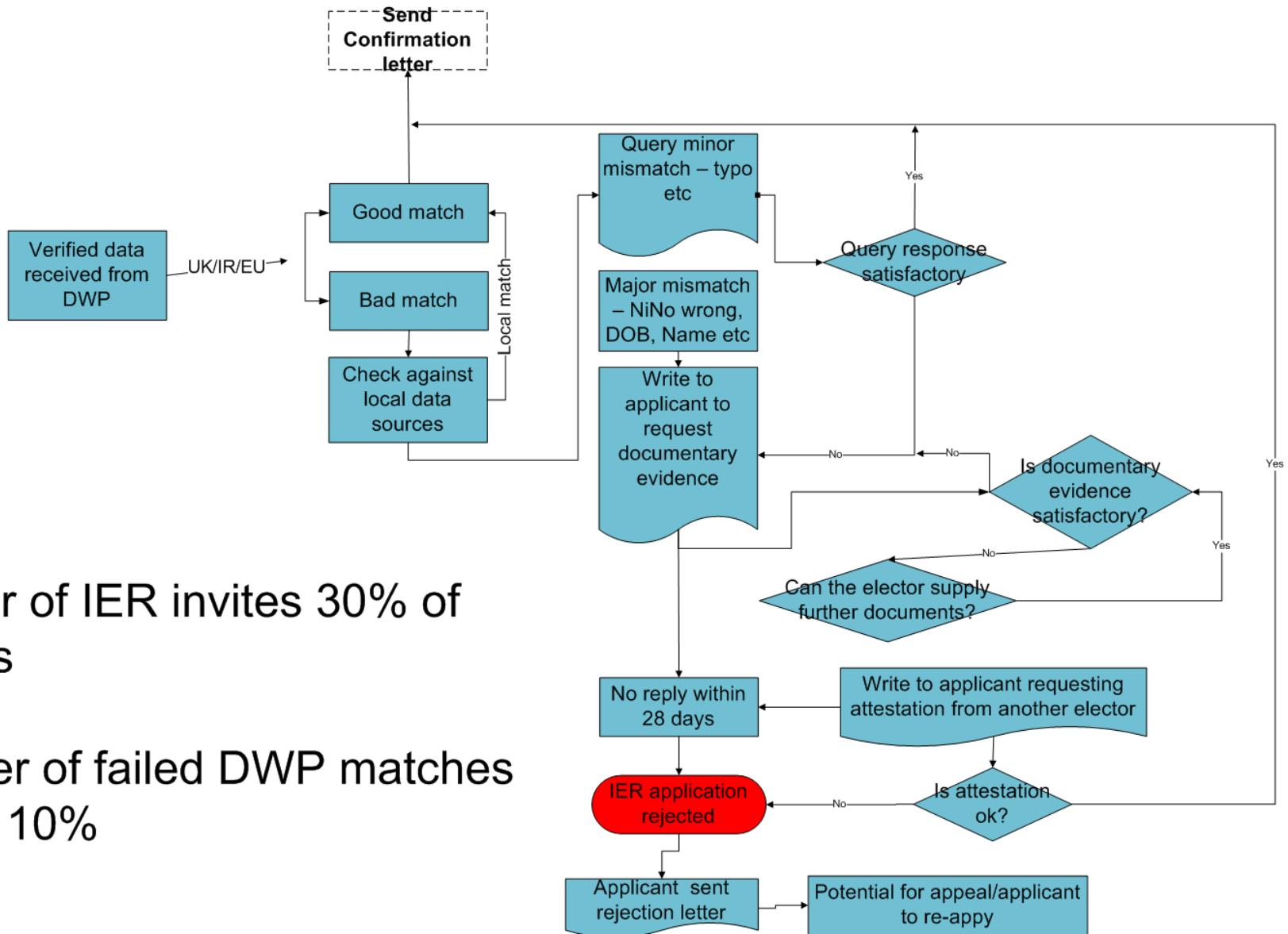
# Incomplete Paper Form

Number of IER invites - 30% of electors

Number of incomplete forms – 10% of electors



# DWP Data Match and Exceptions Process

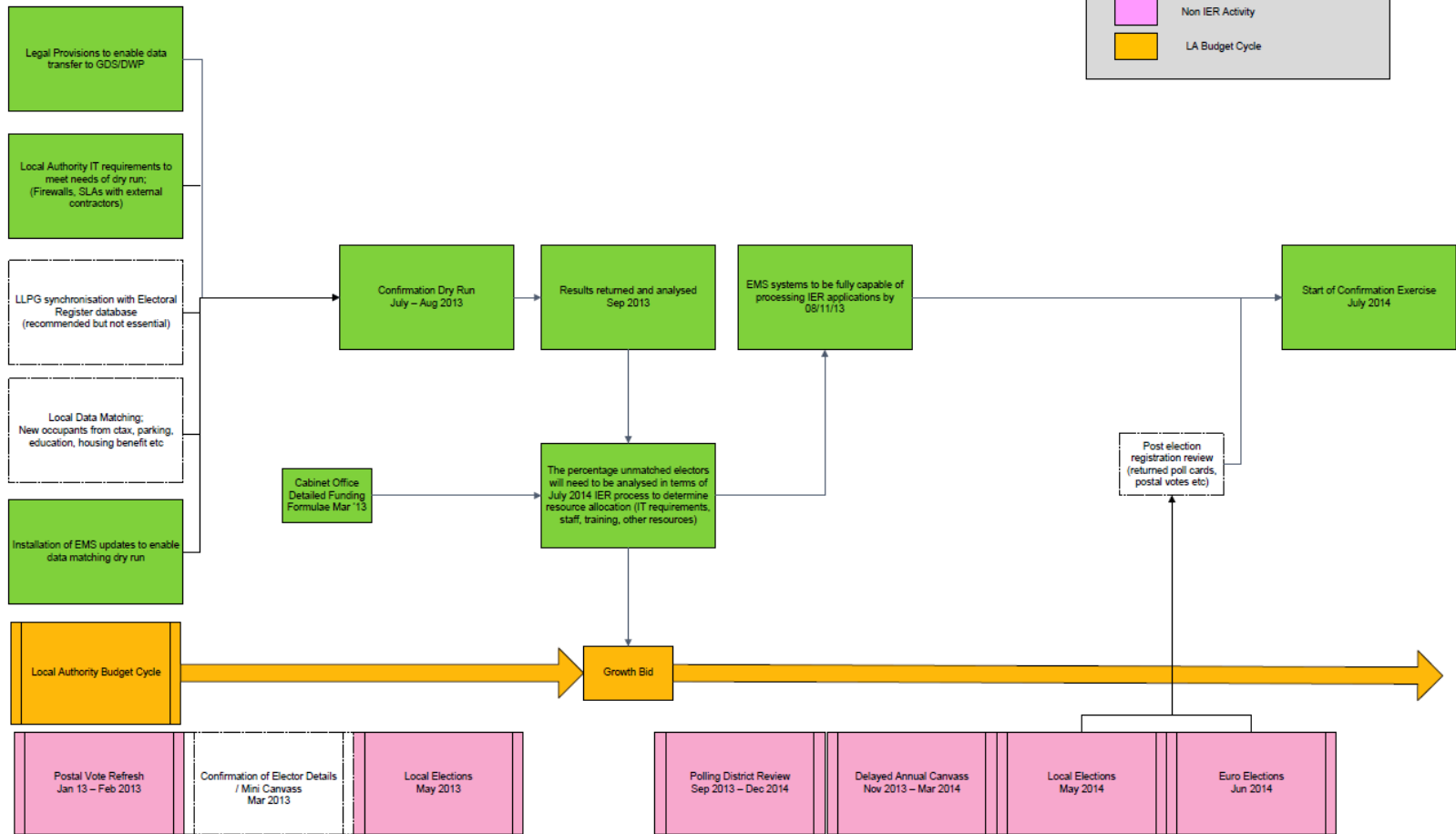
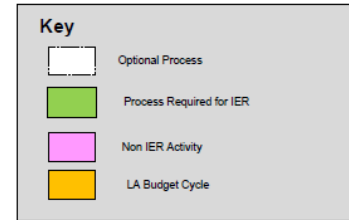


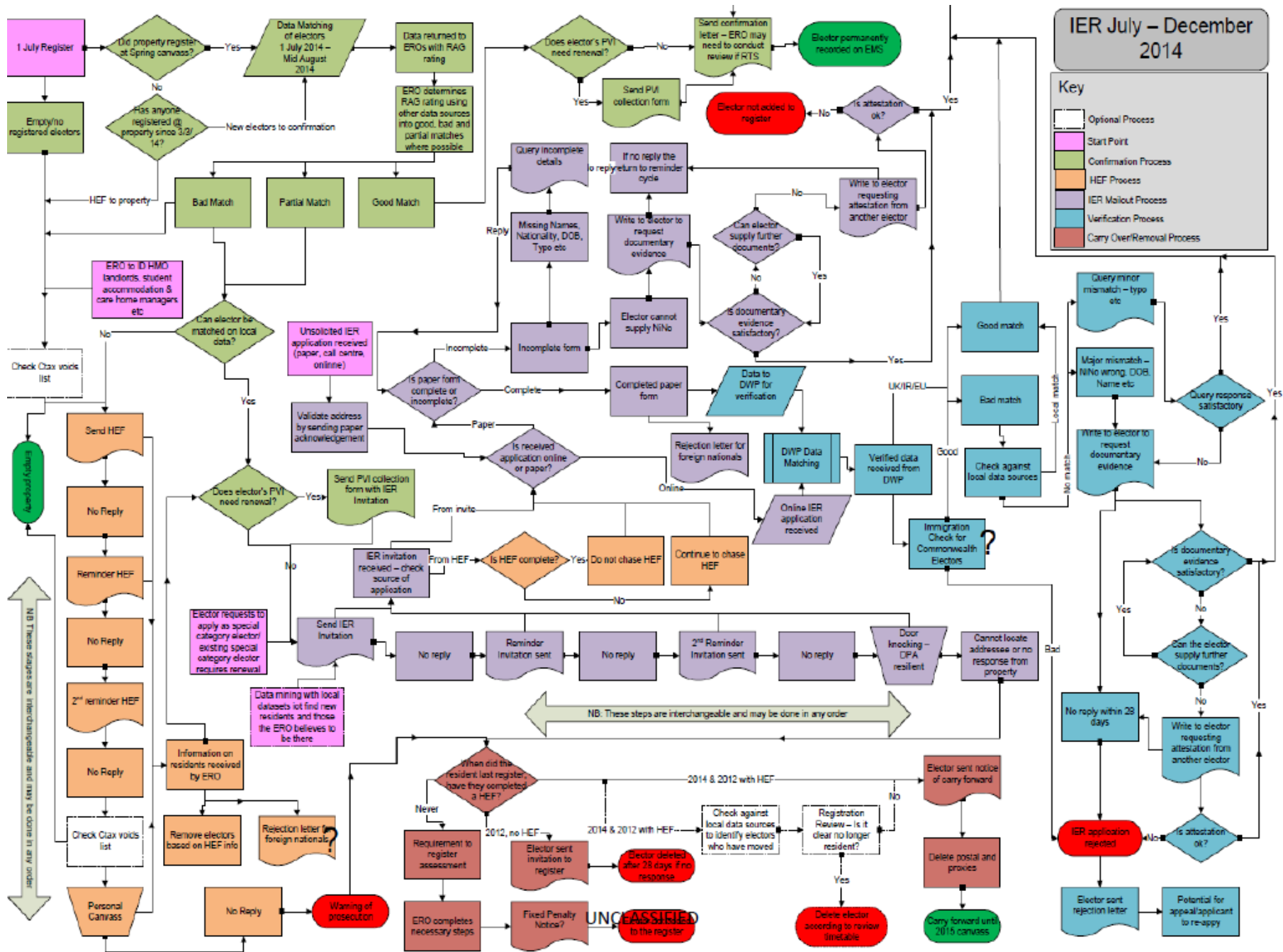
Number of IER invites 30% of electors

Number of failed DWP matches approx 10%

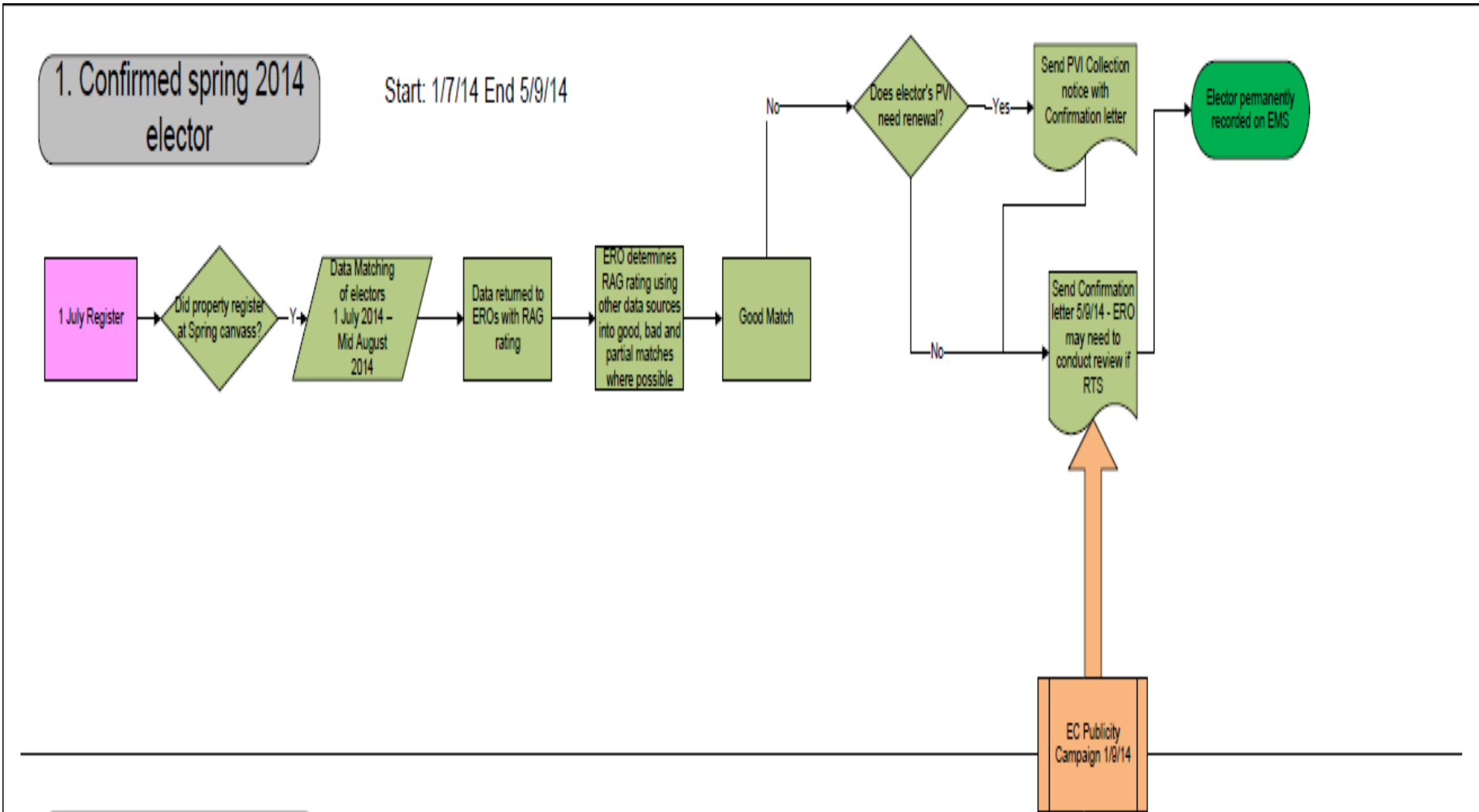
# ERO IER Preparations

January 2013 – June 2014  
IER Preparations by ERO





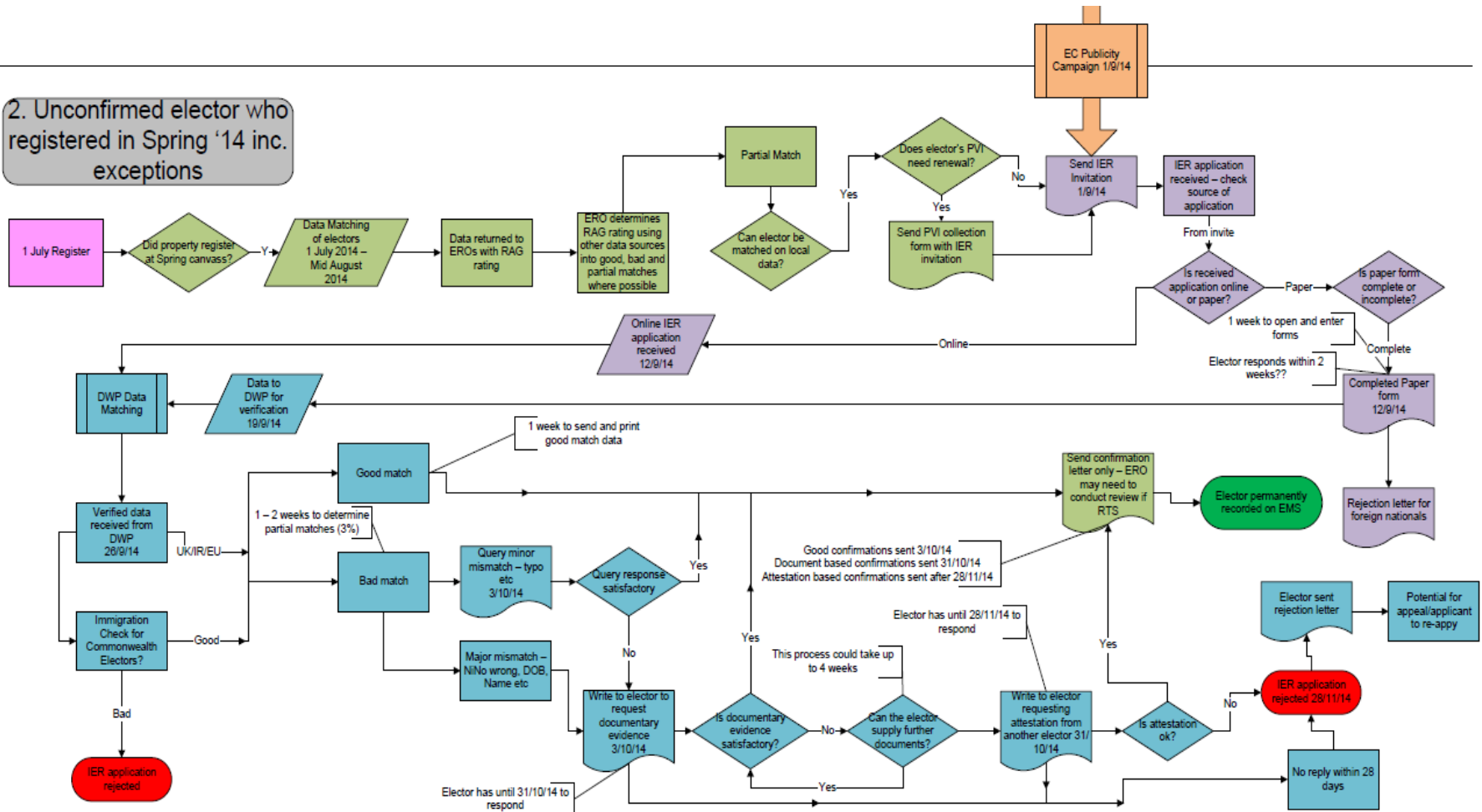
# Process for confirmed elector: Spring 2014



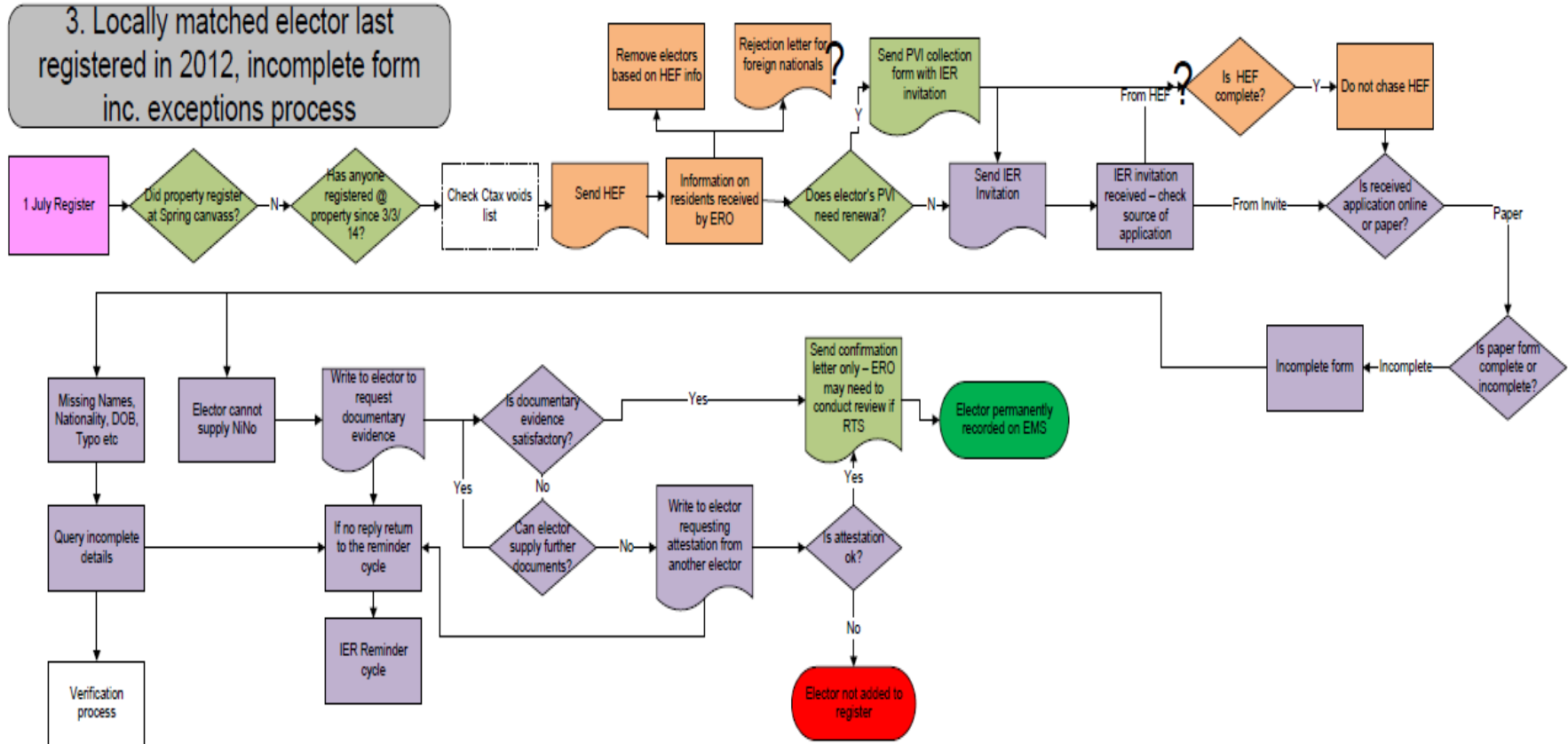


# Process for unconfirmed elector: Spring 2014

## 2. Unconfirmed elector who registered in Spring '14 inc. exceptions

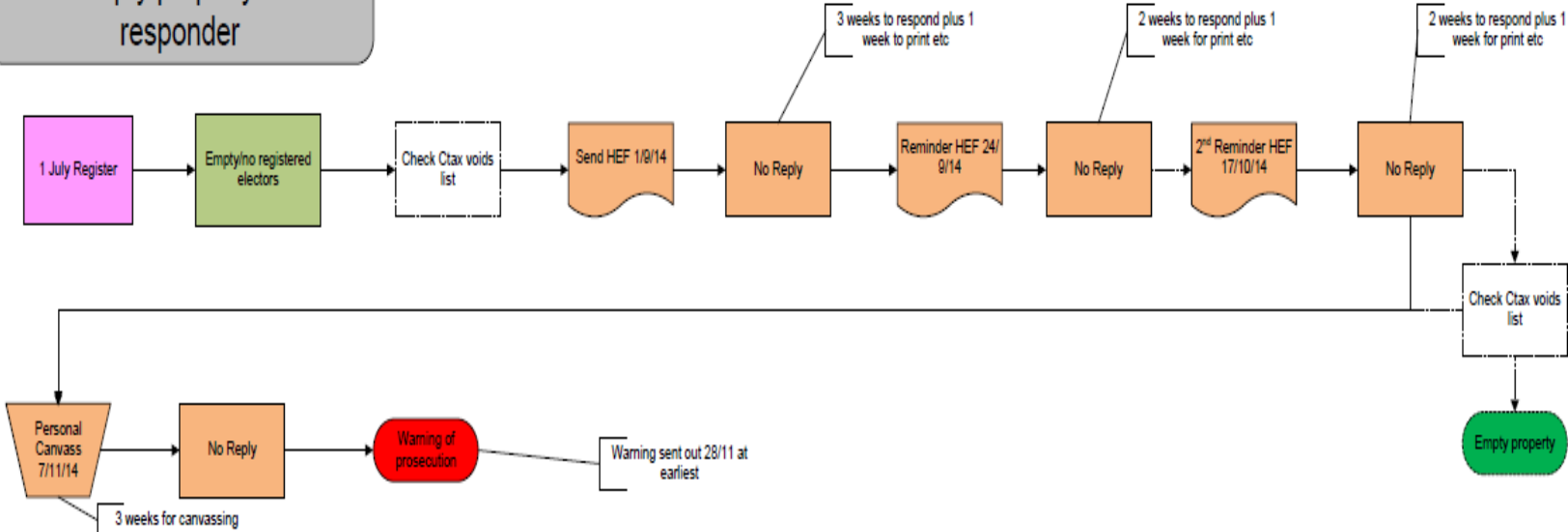


# Elector last registered in 2012, provides incomplete form



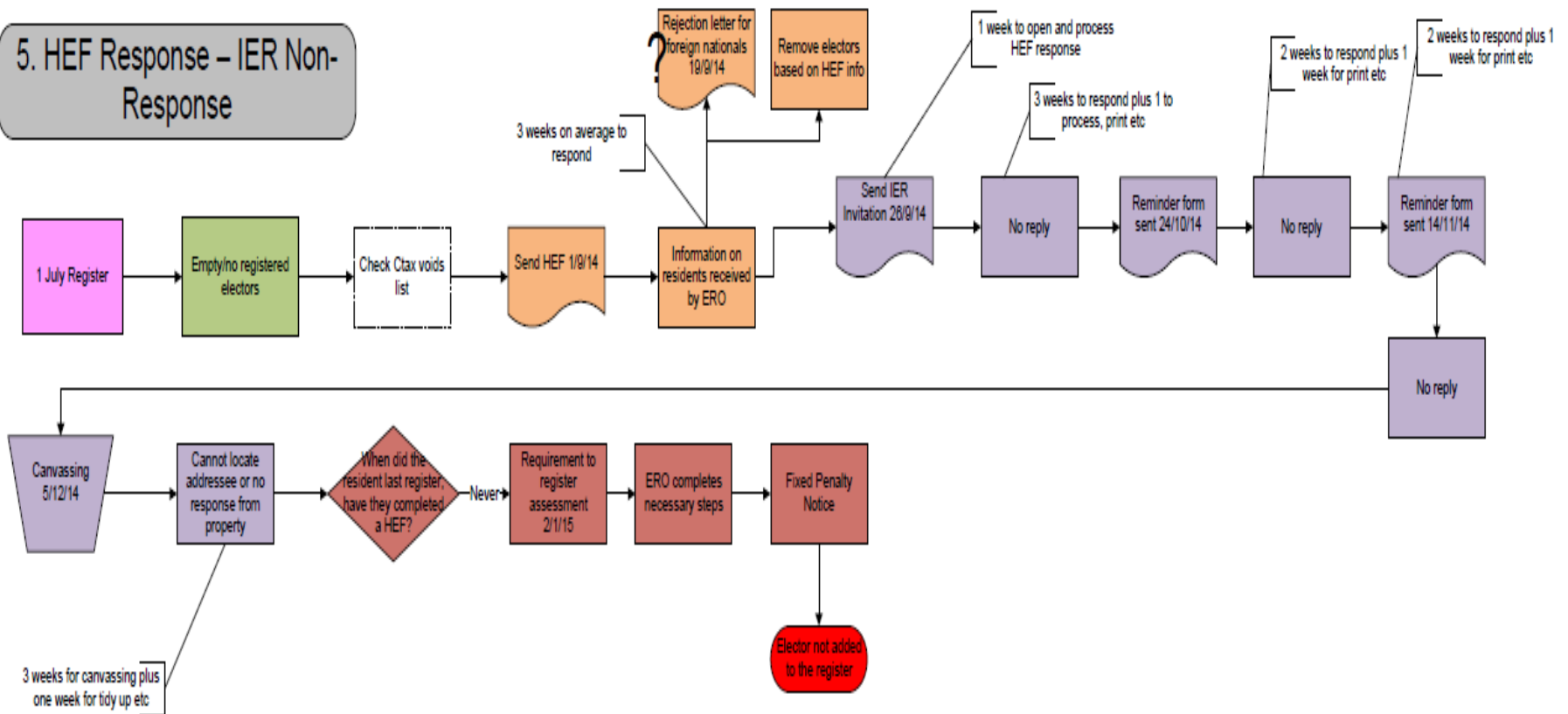
# Empty Property non-responder

## 4. Empty property non-responder



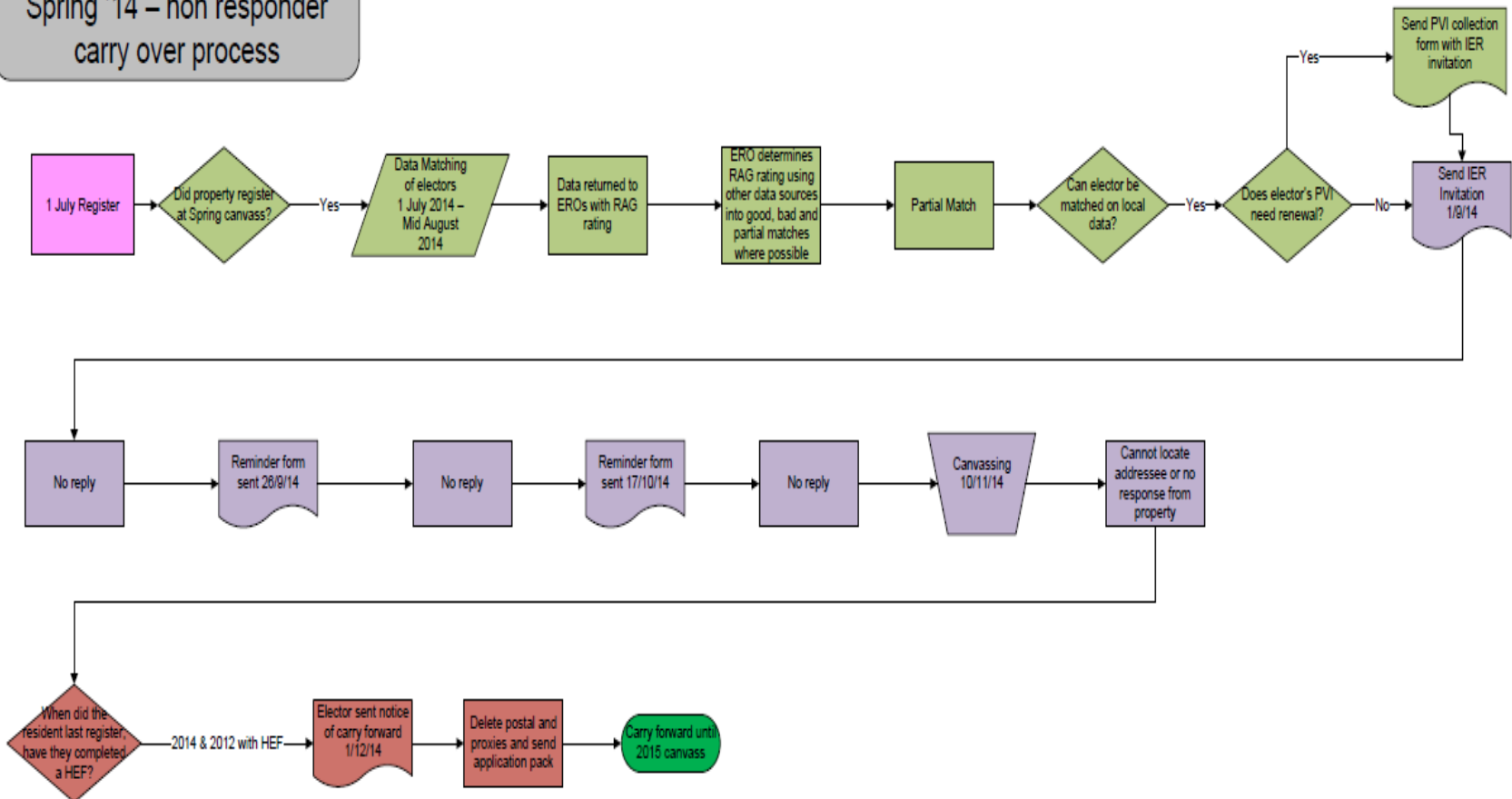
# HEF Response – IER non response

## 5. HEF Response – IER Non-Response

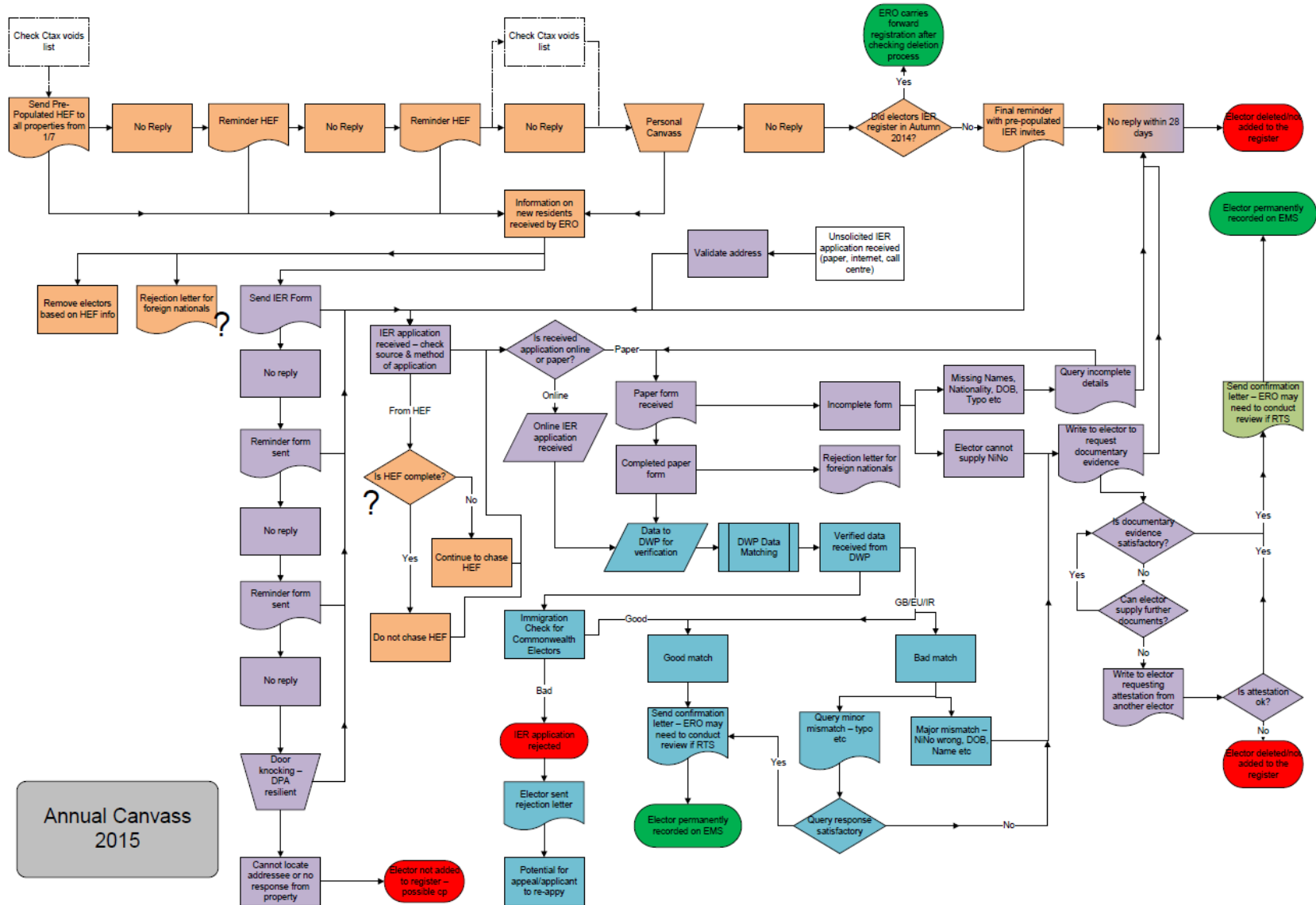


# HEF Response, but no IER response

6. Elector last registered in Spring '14 – non responder carry over process



# Annual Canvass 2015

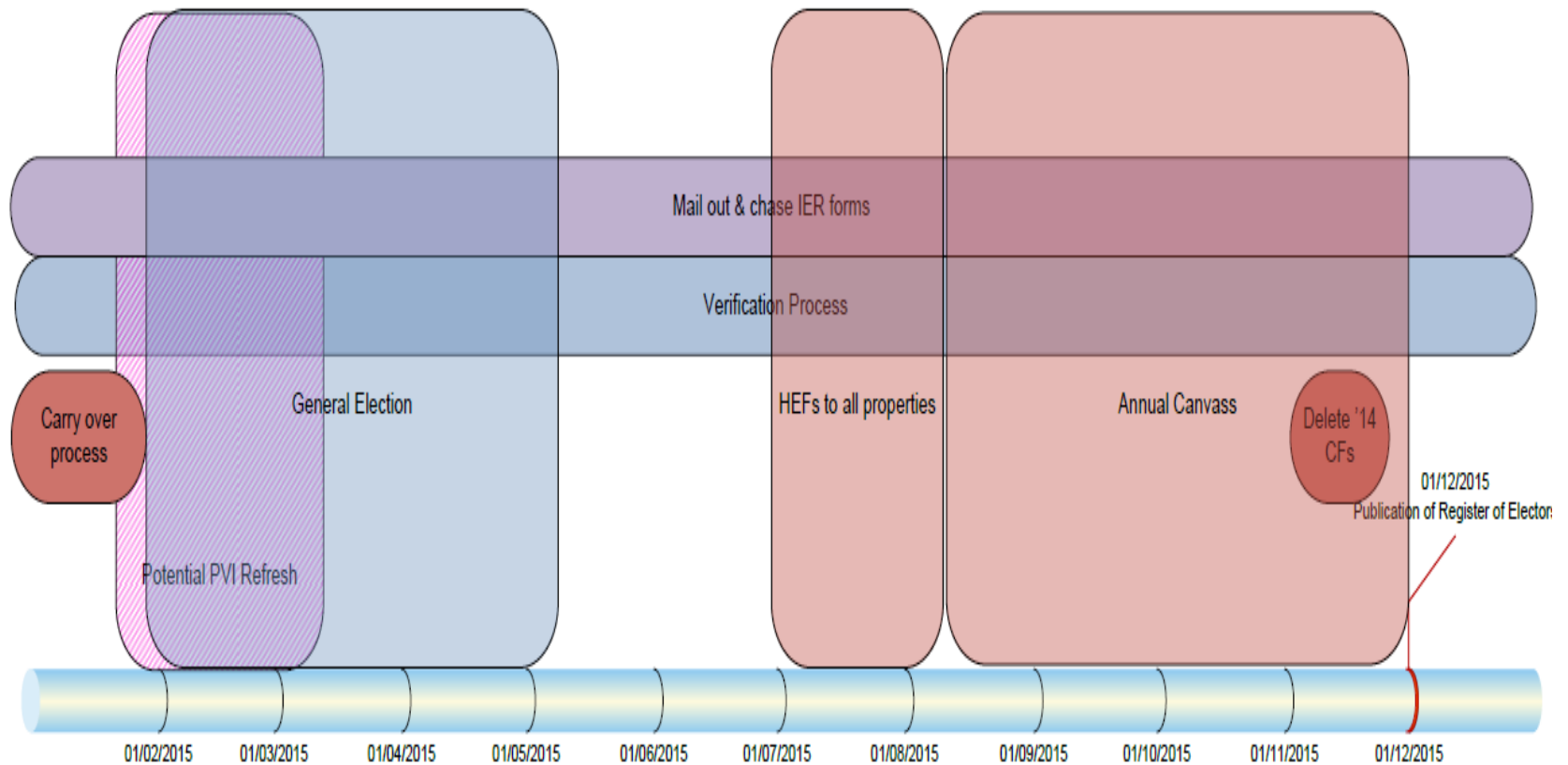


Annual Canvass  
2015

# ERO Work schedule: 2015

Electoral Year Planner  
2015 - 2016

Electoral Year  
2015

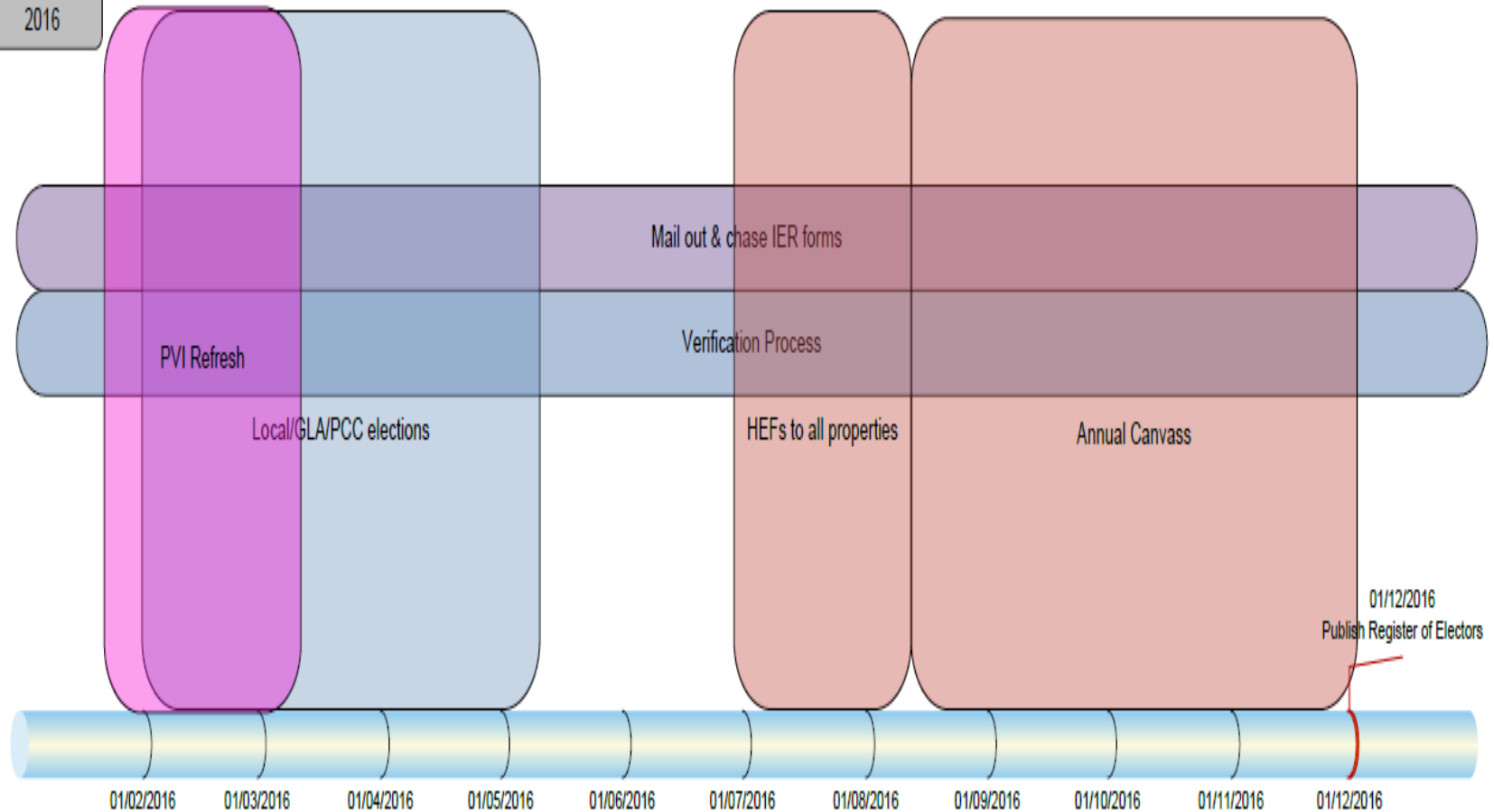


# ERO Work schedule: 2016

01/01/2015

31/12/20

Electoral Year  
2016



01/01/2016

31/12/2011



CO & the ERO have shared these with you to enable you to begin to see the planning and work the introduction of IER entails

Please bear in mind that some elements of these processes are subject to change as the secondary legislation has not yet passed through Parliament

# Process Maps

- Turning the policy into reality
- ERO's have enough time and must make best use of it to prepare
- If ERO's need help, structures will be in place to provide that help from CO
- It is crucial that ERO's start the dialogue, this is part of that process.