

activities in relation to IT, the dry run, funding, resources, management and reporting. We recommended that the plans be fully updated to allow any slippage to deadlines or issues to be highlighted. As at phase 2 in January 2015, the majority of issues are now completed. Some areas are still ongoing e.g. evaluation of systems and processes, which is to be expected given the nature of the project, and we make no further recommendation on this matter.

IER preparation meetings had ceased in the run up to the May 2014 elections. We previously recommended that these meetings recommence to ensure all key officers were fully aware of progress and outstanding issues. Meetings took place in September, October and December 2014 and were minuted. These were attended by the Chief Executive, the Elections Officer and the Human Resources and Transformation Officer and key aspects of IER discussed.

During phase 1 we noted that the project has a risk register however the version provided showed some overdue dates which on further investigation related to actions that had been completed or were (quite reasonably) still ongoing. We recommended that the risk register be updated on a regular basis and reviewed and monitored by management and as part of the IER Preparation Group meetings to highlight deadline slippage and issues arising. In January 2015 we noted that the risk register still showed items that were ongoing but these appeared reasonable given their nature.

In July 2014 HBBC had produced a Public Engagement Strategy showing plans for direct contact, local partner involvement and media & advertising. It was not clear from the document what progress had been made against the plans and we recommended that the Strategy document be updated to show progress to date – this has now been actioned.

A training plan was developed and this has been completed.

Our sample testing in January 2015 in relation to registering electors has found that mismatches have been dealt with on a timely basis and appropriate correspondence issued. The register of electors was published on 1st December 2014 and showed an electorate of 85,024. The breakdown of un-confirmed voters is currently (as at mid-January) 2,466 which are included on the published register and can vote but cannot have a postal vote, and 47 individuals that the Council is aware of via Council Tax records that are not registered voters. This gives the Council a 97.1% confirmed register compared to the 98.4% response rate that was recorded following the 2013/14 old style canvass. It is difficult to compare this level of registration to other authorities as it can be influenced by demographic factors, for example, those with large student populations have larger numbers outstanding. National data indicates that 90% of previous electors were able to be automatically included on the new register.

Those un-confirmed electors are still part of the case cycle and continue to receive reminders and form part of the 14 working day printing schedule. The Cabinet Office has issued an additional amount of money to perform a Confirmation Write Out (essentially another canvass, writing out to all households in the style of the old canvass). This did not form part of the original project plans and is not a requirement. Discussions are currently underway within the Council about whether to pursue this so close to the elections and the cost implications, and possible alternatives.

Conclusion

We have been able to conclude from our review on this matter that the Council's project to implement Individual Electoral Registration has embodied reasonable and appropriate controls in relation to the objectives we covered in the review, and that the recommendations from phase 1 of our review have been substantially implemented (see the attached updated Action Plan). As noted above, work continues to ensure registration of electors is as complete as possible; the Council's level of registration at this stage appears to be at a higher level than reported national averages.

Yours sincerely,

Tim Ridout
Chief Internal Auditor

Compliance with applicable standards

Our review of compliance against the applicable audit standards has confirmed that this engagement has been conducted in accordance with the International Standards for the Professional Practice of Internal Auditing. In conducting this assignment we can confirm that there have been no impairments to our independence or objectivity, either as an organisation or as individual auditors involved in delivering this service.

Responsibility Statement

We have prepared this document solely for your use and, therefore, we believe that it would not be appropriate for it to be made available to third parties. If such a third party were to obtain a copy, without our prior written consent, we would not accept any responsibility for any reliance that they might place upon it.

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Date: 2nd September 2014

To: Julie Stay Resources and Transformation Manager

Cc: Hannah Tonks Electoral Services Officer
Katherine Plummer Head of Finance

From: Tim Ridout Chief Auditor

Re: **Internal Audit Interim Overview – Individual Electoral Registration**

Dear Julie,

As part of the 2014/15 Internal Audit Plan, a review of Individual Electoral Registration is due to be carried out. As agreed, this will take place in two phases, phase 1 an initial overview of project planning and progress to date to be undertaken in July and phase 2 a detailed review to be carried out at the end of October 2014.

This letter sets out the findings and conclusions in relation to phase 1.

Background

The Electoral Registration and Administration Act 2013 introduces a major change to the electoral registration system by introducing Individual Electoral Registration (IER) in Great Britain in order to modernise the electoral registration system and tackle fraud. IER replaces the existing system of household registration from 10th June 2014 in England. Electors will be asked to register individually and will be required to provide identifying information which will be checked (“verified”) before the individual can be added to the electoral register. This process will replace the existing system of household registration. It is expected that the majority of current electors will be transferred to the individual electoral register automatically via “confirmation” (matching electoral registers against records held by the Department for Work and Pensions). Therefore it will be possible to confirm the majority of people on the existing electoral register at the transition to IER, without the need for them to apply individually and they will not be required to share their personal data in order to remain on the electoral register when IER is introduced.

Verification of existing electors who do not match with DWP’s database during the confirmation exercise, and verification of new applications will involve the handling of

personal data in a new way. Individuals applying to register to vote will be required to provide additional information which will be used to verify their application before they are added to the electoral register.

Scope and coverage

The overall objective of phase 1 of the review is to carry out an initial overview of the project management arrangements in place.

Findings

The Electoral Services Commission has issued preparation plans and guidance to aid authorities to plan key activities in relation to IT, the dry run, funding, resources, management and reporting. The latest version of the preparation plan in use is version 5. This has not been fully completed to show progress to date. It is recommended that this be fully updated to allow any slippage to deadlines or issues to be highlighted.

Individual Electoral Registration Preparation meetings were held on 2/7/13, 12/8/13 and 1/10/13 and were attended by the Chief Executive, the Electoral Registration Officer and representatives from IT, Finance and Council Tax. Meetings ceased in the run up to the May elections. It is recommended that these meetings recommence to ensure all key officers are fully aware of progress and outstanding issues.

The “project” has a risk register however the version provided shows some overdue dates which on further investigation have been completed or are still ongoing. It is recommended that the risk register is updated on a regular basis and reviewed and monitored by management and as part of the IER Preparation Group meetings to highlight deadline slippage and issues arising.

HBBC has produced a Public Engagement Strategy which shows plans for direct contact, local partner involvement and media & advertising. It is not clear from the document what progress has been made against the plans. It is recommended that the Strategy document is updated to show progress to date.

A training plan has been developed but again this has not been fully updated to show progress to date. It is recommended that the training plan is regularly updated

Conclusion

The detailed findings and recommendation can be found in appendix one. In summary it was found that key documents and plans have been developed but have not been kept up to date to evidence that activities are on track and highlight deadline slippage. The last meeting of the IER preparation group was in October 2013 and these should recommence to ensure key officers have up to date knowledge of progress and issues.

Yours sincerely

Tim Ridout
Chief Internal Auditor

Action Plan

Expected Control	Findings	Risk Ranking	Risk	Recommendation	Management Response	Officer Responsible	Position as at January 2015
<u>1. Plans and Registers</u>	<p>The Council has developed a number of plans and registers to ensure that the new Individual Electoral Register is implemented as required:</p> <ul style="list-style-type: none"> • The Electoral Services Commission has issued preparation plans and guidance to aid authorities to plan key activities. The latest version of preparation plan is v5 but not all sections have been kept fully up to date. • The risk register was found to be not fully up to date. • The training plan is not fully up to date showing activities carried out. • The Public Engagement Strategy should be updated to show progress to date. 	3	<p>Failure to meet deadlines. Failure to resolve issues.</p>	<p>The various plans and registers should be regularly updated to highlight deadline slippage and issues outstanding on a timely basis.</p> <p>These should be monitored on a regular basis.</p>	<p>The Electoral Services Officer will update the Preparation/Project Plans and Risk Register and these will be monitored during one-to-ones and monthly meetings.</p>	Electoral Services Officer	Implemented.
<u>2. Meetings</u>	<p>Individual Electoral Registration meetings took place in July, August and October 2013 and were attended by the Chief Executive, Electoral Registration Officer and representatives from IT, Finance and Council Tax. Meetings were suspended for the May elections and have not been scheduled since.</p>	3	<p>Key deadlines not met. Issues not resolved on a timely basis.</p>	<p>Formal meetings should be held with key officers to monitor progress.</p>	<p>Monthly meetings have been arranged from September to January 2015 and will include the Chief Executive and representatives from IT, Finance and Council Tax.</p>	Electoral Services Officer	Implemented

Appendix 2 Definition of our risk rankings

Risk ranking	Assessment rationale
1	The system has been subject to high levels of risk that have, or could, prevent the system from meeting its objectives, and which may also impact on the delivery of one or more of the organisation's strategic objectives.
2	The system has been subject to high levels of risk that have, or could, prevent the system from meeting its objectives, but which are unlikely to impact on any of the organisation's strategic objectives.
3	The system has been subject to medium levels of risk that have, or could, impair the system from meeting its objectives.
4	The system has been subject to low levels of risk that have, or could, reduce its operational effectiveness.

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