

STUDENTS AND DEMOCRACY

*How universities help students
register to vote*

April 2023



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About the UK Democracy Fund

The UK Democracy Fund is a pooled Fund set up by the Joseph Rowntree Reform Trust (JRRT) in 2019 and supported by a group of committed funders. The Fund is independent and non-partisan, and works to build a healthy democracy – one in which everyone can participate and where political power is shared fairly.

The UK Democracy Fund funded the research for this publication. The material presented in this report represents the views of the author(s), not necessarily those of JRRT or other UK Democracy Fund contributors.





About Purpose Union

Purpose Union is a social purpose strategy consultancy united by the belief that the world is better off when organisations think, act, and communicate with a defined social purpose.

We provide research and strategy for our partners, and use the results to develop compelling arguments, build powerful coalitions, and devise winning campaigns to change the world for good.

We prefer using grounded methodology to conduct qualitative research, and use quantitative analysis to test hypotheses and understand the wider landscape.

A group of approximately seven dogs of various breeds, including Golden Retrievers, a Papillon, and a black and white dog, are standing on a paved path. They are all on leashes. In the background, a person wearing blue jeans and brown shoes is walking away from the camera. To the right, there is a white sign with the words "POLLING STATION" in bold black letters, leaning against a wooden post. The scene is outdoors with some greenery and fallen leaves visible.

BACKGROUND AND INTRODUCTION

Executive Summary

University students experience many important milestones that mark their transition into adulthood. For many, one of those moments is casting a vote in their first election.

Participating in democracy is a key element of civic life, conferring both rights and responsibilities on citizens, and giving them a stake in their community and country.

However, in order to vote in the UK, you first need to register, a process that has become significantly more complicated for students since the introduction of Individual Electoral Registration (IER) in 2014. Although data is limited, there is evidence to suggest that students are much less likely to be registered to vote as a direct result of this reform.

To mitigate the impact of IER, the Office for Students requires all universities in England to help students register to vote. However, it does not specify the kinds of activities that are deemed to be best practice, nor monitor compliance with its regulations. This means that there is very little information about the state of student voter registration across the UK, without which it is impossible to understand how to improve the system.

This paper, funded by the UK Democracy Fund, seeks to provide a better understanding of the role of universities in helping students register to vote. Using a mixed methodological approach, it explores the different activities universities are carrying out to register students, along with the main challenges they face.

We found that providing students with the option to register to vote during university enrolment (known as auto-enrolment) is the most effective way of increasing registration numbers. However, universities who wish to implement auto-enrolment are hampered by

Executive Summary

an absence of formal information and guidance on how to go about it, as well as a lack of coordination from the centre to provide consistency on areas such as technology and data.

Without this support and sector leadership, each university that seeks to implement auto-enrolment has to effectively start from scratch, using up a significant amount of time and resource ‘reinventing the wheel’, which could have been better spent on other important work to engage students with democracy.

After exploring the primary barriers to increasing uptake of auto-enrolment, we offer six recommendations to the sector to make the process simpler and more attractive to university and local authority staff. We identify actions universities, local authorities, the Office for Students and the Electoral Commission can take to ensure all universities can offer students the chance to register to vote through auto-enrolment, which we believe could significantly increase the numbers of registrations. With an election likely to take place in the autumn of 2024, these measures are all the more urgent.

In engaging with university and students’ union staff throughout this process, we uncovered a heartening commitment to student voter registration. They were passionate about their university’s role in engaging students with civic life, dedicated much time and effort to voter registration, and were extremely willing to innovate where they could.

Similarly, all the electoral services staff in local authorities took their responsibilities for student registration extremely seriously, dedicating significant time and resource to increasing uptake and going far beyond the minimum level required by law.

Executive Summary

While we have focused primarily on universities due to the sheer numbers of students they serve and the relative similarity between institutions in the way they operate, some of our recommendations are applicable to other higher education providers, such as colleges. We hope more work focusing on the role of colleges specifically can be done in future.

Universities and local authorities across the UK participated in our research. However, as the Office for Students is the regulator for England, some of our findings and recommendations apply only to England. We are particularly excited by a number of pilots testing ways to improve voter registration in Wales, and would urge the UK and Scottish governments to engage with the results and commit to making improvements across the rest of the country.

We hope this study provides the higher education sector and bodies responsible for electoral registration with a deeper understanding about the barriers universities face in helping students register to vote, and arms them with a blueprint for how to improve the process so that all students are able to quickly and easily register to vote, marking an early, yet important step on their journey into civic life.

Methodology

Qualitative

We conducted qualitative research in the form of depth interviews with representatives from across the higher education sector.

30 interviews were held over video call, primarily with one participant but occasionally with 2-3 members of the same team.

With university and electoral services staff - our primary interviewees - our approach was informed by grounded theory to avoid data influenced by preconceived hypotheses.

Total participants	30
University Staff	8
Students' Union Staff	3
Electoral Registration Officers (EROS)*	5
Professional Associations	6
Higher Education Sector Influencers and Experts	6
Software Providers	2

*In practice, an ERO's duties may be carried out by appointed staff within Electoral Services Teams. As such, when we use the term 'ERO', we mean anyone who is carrying out the ERO's duties on their behalf.

Methodology

Quantitative

We issued a call for evidence to Academic Registrars, Heads of Student Services and Chief Operations Officers at every registered higher education institution in the UK.

Participants were asked to complete an online dynamic survey, with question paths changing according to responses of specific anchor questions.

While universities based in Northern Ireland, Scotland and Wales were invited to participate in the research, our primary focus was on universities in England because of the regulatory remit of the Office for Students.



	Institutions	Responses
England	126	43
Northern Ireland	2	0
Scotland	18	5
Wales	8	3
Total	154	51





RESEARCH FINDINGS

Research Summary

The following section outlines the primary findings from our study. It covers a number of key areas that are of particular relevance to the question of how to improve student voter registration.

First, we explore the **current regulatory landscape**, presenting a summary of the rules and requirements for voter registration in the UK in general, the impact of recent reforms on student registration in particular, and the role of universities and local authorities in encouraging uptake.

Second, we identify the **extent and range of activities** universities do to help students register to vote. We take a deep dive into what appears to be the activity that has the most impact on registration numbers - enabling students to register to vote when they enrol (known as auto-enrolment) - establishing the main benefits and disadvantages, as well as the barriers facing universities who wish to implement it.

We also investigate the **student registration software** offered by technology agency Jisc, which provides universities with an alternative to auto-enrolment. The service is being withdrawn in July 2023 and we explore potential reasons for this, as well as the impact it may have on the sector.

Finally, we outline **four case studies** that explore the activities of universities and local authorities in more detail.

Regulatory Landscape Timeline



Regulatory Landscape

Electoral Registration

Individual Electoral Registration (IER) was introduced in 2014 as a replacement for the household registration system.

It required each individual to register themselves to vote. This impacted students in that prior to IER, universities had been able to register all students living in halls of residence on their behalf.

Impact of Individual Electoral Registration on Students

It is difficult to assess the true impact of the introduction of IER on students, primarily because there is no official national data on the proportion of students who are registered to vote. A poll by YouthSight¹ in 2015 found 78% of students said they were registered to vote (compared to a national estimate of 85%²), but this data was self-reported and there was no way to check accuracy against the electoral roll.

We can infer levels of probability from official data collected by the Electoral Commission on registrations by age, tenure or duration at address (see Figure 1), but such proxies are somewhat unsatisfactory. Students tend to be younger and renters who move to new addresses each year, factors that are all associated with lower levels of registration.

Indeed, evidence given by the British Election Study to the House of Lords Select Committee on the Electoral Registration and Administration Act 2013 highlighted that residential mobility is “probably the main factor” that accounts for the lower rates of student registration.³

As only 36% of people who have lived at their address for under a year are registered,⁴ we can assume that students are indeed less likely to be registered to vote compared with the rest of the population.

¹ Singh, Matt, *Number Cruncher Politics* (2015)

² Electoral Commission, *Accuracy and Completeness of the December 2015 electoral registers* (2016)

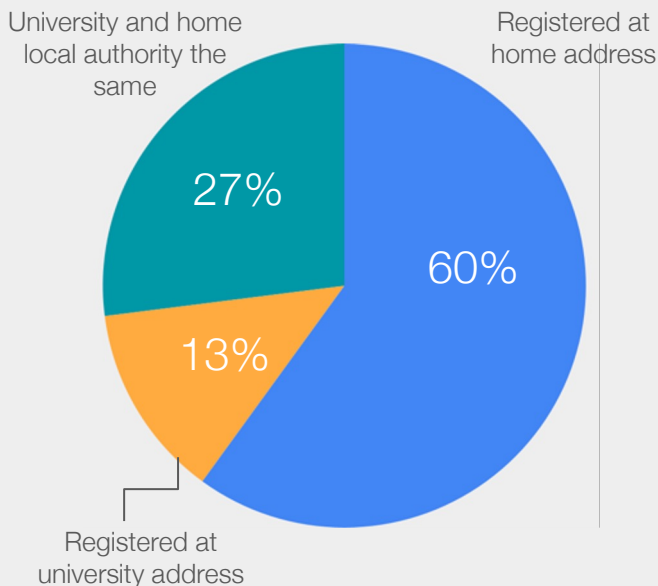
³ House of Lords, *Report of Session 2019-21 HL Paper 83* (2020)

⁴ Electoral Commission, *Accuracy and completeness of the 2018 electoral registers in Great Britain* (2019)

Regulatory Landscape

Electoral Registration

Where students are registered to vote



The introduction of IER led to a fall in registration among the general population, but the impact was greater among students. A BBC investigation found that areas with high student populations saw voter registrations fall of nineteen times greater than the previous year. This compared to a fall just three times greater in non-student areas. Analysis at the ward level showed an even more marked impact - in some wards there was a fall in registrations of up to 60% after the introduction of IER.⁵

Since 2014, there have been some improvements made to the system, including the reform of the annual canvass of electors conducted by local authorities and the passage of the Higher Education and Research Act 2017. Universities have also had time to get used to the new system and adjust their activity, so it is likely the situation has improved, though it is unclear by how much.

Students may also be less likely to register at university as a result of confusion around the rules on registering in two places. Students can register at both their permanent home and their university address (provided they are in separate local authority areas). While many students are undoubtedly aware of this right, since IER, some may now feel they have to choose where to register, impacting their ability to vote at local elections.

The UK Government's Every Voice Matters report found a clear preference for students to be registered at their home address, with 60% registered at home and only 13% at their university and that "many are often worried about registering in their university constituency for fear of losing their registration at their home constituency."⁶

⁵ Dilnot, Giles, *BBC* (2014)

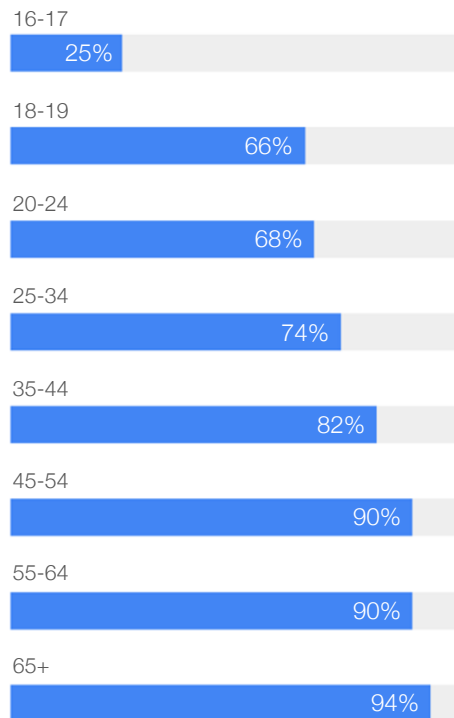
⁶ HM Government, *Every Voice Matters: Building A Democracy That Works For Everyone* (2017)

Figure 1: Regulatory Landscape - Demographic breakdown of registered voters

On multiple counts - age, tenure and residency - the groups among the lowest propensity to be registered are ones that many students fall into.

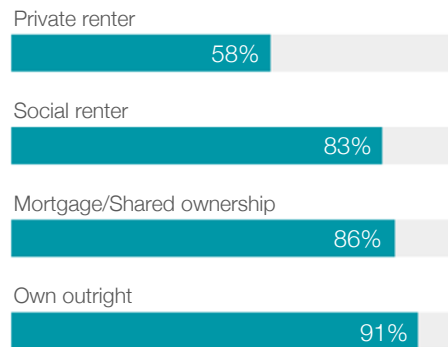
Age

% registered in 2018



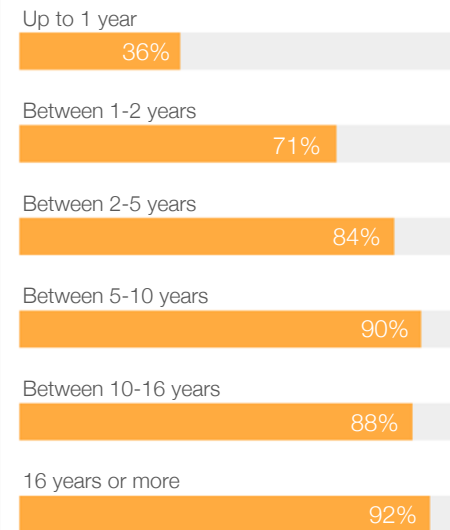
Tenure

% registered in 2018



Duration at address

% registered in 2018



Regulatory Landscape

Electoral Registration

Impact of Individual Electoral Registration on Universities

When universities were able to block register students living in halls of residence under the household registration system, the entire process could be carried out relatively simply and quickly each year.

Since the introduction of IER, much more time and resource is now spent on the registration process for all students, which misses opportunities to engage them in other aspects of the democratic process, such as hosting debates or encouraging turnout at election time.

Coupled with the perceived politicisation of university campuses and the public debate around cancel culture and freedom of speech, some universities report doing less on general democratic engagement than before.

Further, several of the universities we spoke to said that, while voter registration was an issue, their primary concern was currently on the potential impact of the introduction of voter ID requirements at the May 2023 local elections. This is not a topic for this report, but demonstrates that improving voter registration is just one of many areas of focus for universities and, understandably, is not always a top priority.

Regulatory Landscape

The Annual Canvass

The annual canvass is an exercise conducted by local authorities every year between June and November to check that the information on the electoral roll is as accurate and up-to-date as possible.

After the introduction of IER, the annual canvass became more expensive, complex to administer and confusing for voters.⁷ Electoral Registration Officers (EROs) had to send every household a canvass form, which required a response whether or not there had been changes to the household. If no response was received, the ERO followed up with two further reminders and a visit.

In 2020, the annual canvass was reformed to include a 'data matching' step, where EROs use data, to assess whether the voters living in each property are likely to have changed. This enabled the canvass step to be streamlined into three 'Routes' (see Figure 2):

- Route 1: Matched Properties - a response is only required if there has been a change to the household.
- Route 2: Unmatched Properties - data indicates a likely change to the household so the ERO must make at least three contact attempts during the canvass.
- Route 3: Defined Properties - data can be requested from a 'responsible person' to provide information for all residents living in specific property types such as care homes or halls of residence.*

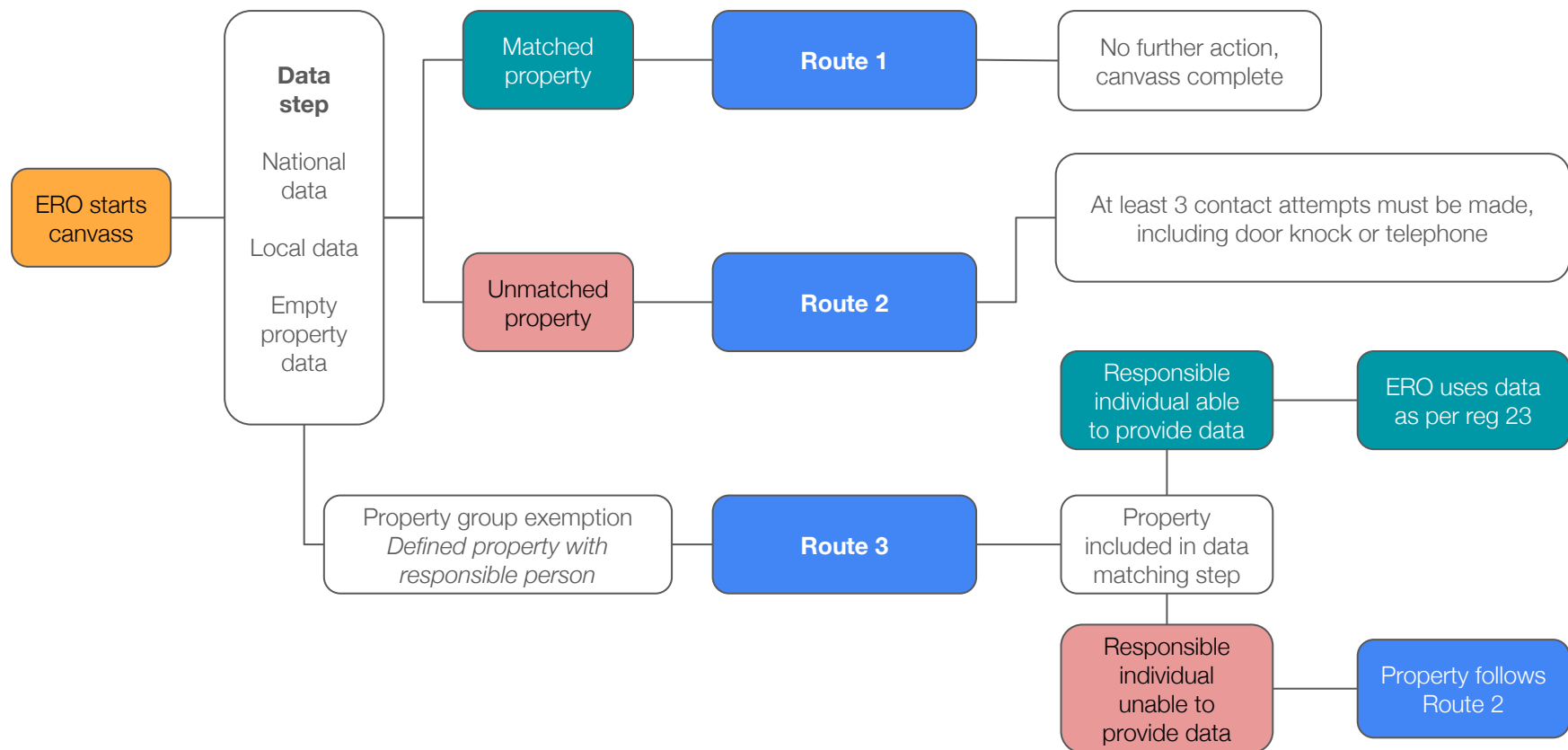
The Routes provided a simpler and more cost-effective way to conduct the canvass, and made requesting student data from universities a more appropriate option for many EROs.

Our research revealed a general difficulty with the annual canvass in that it is conducted from June to November. During the summer, students often live away from university, leaving only a few weeks from the start of the academic year to the end of November for students to be identified and invited to register. Of course students can register after the canvass, but local authorities will not be proactively seeking registrations at this time.

*The power to request such data is provided by the Representation of the People Regulations 2001

⁷ Electoral Commission, *The Annual Canvass and Canvass Reform* (2020)

Figure 2: Reformed Canvass Model



Regulatory Landscape

Condition E5

In 2018, following an amendment by Paul Blomfield MP to the Higher Education and Research Act 2017, the Office for Students (OfS) outlined Condition of Registration E5, which states that:

“The provider must comply with guidance published by the OfS to facilitate, in cooperation with electoral registration officers, the electoral registration of students.”⁸

The Office for Students’ Regulatory Framework for Higher Education in England sets out the expectation that, under Condition E5, higher education providers are expected to:

1. Understand their duty to comply with requests for student information from EROs;
2. Develop and maintain effective partnerships with local EROs for the purpose of enabling student voter registration;
3. Actively promote electoral registration among their students.⁹

Awareness of the Condition

There is concern that parts of the sector are not fully aware of, or engaged with, this expectation. The government’s own analysis highlighted that, although 81% of providers had heard of the Condition (rising to 98% among universities) only 41% had actually read the guidance themselves (rising to 78% among universities).¹⁰

The same research shows an extremely high correlation between reading the guidance and implementing any activity to encourage registration: 96% of providers who had read the guidance were carrying out activity compared to 83% of those who had not.

The difference is even more pronounced when it comes to more complicated and time-consuming - but more effective - activity to help students register to vote. For example 36% of providers who had read the guidance had enabled students to register to via enrolment forms, compared to just 15% who had not. Further, 90% of providers who had read the guidance were sending tailored messages to students about registration, compared to 63% of those who had not.

⁸ Office for Students, *Condition of Registration* (updated 2022)

⁹ Ibid, *Regulatory Advice 11: Guidance for providers about facilitating electoral registration* (2018)

¹⁰ Cabinet Office, *Student Electoral Registration Condition Evaluation* (2021)

Regulatory Landscape

Condition E5

Aside from it being a condition of registration for the OfS, there doesn't seem to be a clear set of expectations about how we are meant to facilitate electoral registration.

There should be a precedent set for what should be implemented, with a range of options for different university needs.

I've seen lots of variations and huge innovation on student registration. Gathering data on best practice will be important.

Guidance on best practice

The OfS does not prescribe how universities should address student electoral registration, saying that what works well for one institution may not work for another. University staff we interviewed indicate a general desire for OfS guidance not to be too prescriptive, not least because the OfS places a large number of obligations on higher education providers and there is little appetite for further adding to the regulatory burden.

However, some institutions were frustrated by a lack of trusted guidance from the OfS about either what works when it comes to student registration activity or how to implement the more complex processes, particularly those that involve handling student data.

The Department of Education issued guidance to the OfS on implementing Condition E5, outlining a planned government impact assessment and recommending the OfS “works with the Electoral Commission and Association of Electoral Administrators to review its guidance to providers in light of findings from the...evaluation, with the aim that registered higher education providers...use proven good practice”.¹¹ While the impact assessment was published in 2021, it is not clear the subsequent OfS review has been carried out.

The OfS did set out good practice examples in its Regulatory Advice¹², but those were a reproduction of previous government examples and nothing new appears to have been gathered or published since 2018. What's more, the Advice cites guidance on registering students from the Electoral Commission via a link that is no longer accessible. We have since tracked down the document in question¹³ but it was targeted at EROs and does not contain the level of detail that would be required from the perspective of university teams.

¹¹ Department for Education, *Facilitating Electoral Registration: SoS Guidance to the OfS* (2017)

¹² OfS, *Regulatory Advice 11: Guidance for providers about facilitating electoral registration* (2018)

¹³ Electoral Commission, *Sharing Good Practice: Reaching Students*

Regulatory Landscape

Condition E5

Monitoring compliance

The government set out an expectation that OfS would “monitor registered higher education providers’ delivery of actions specified in relevant guidance to ensure compliance with the electoral registration Condition.”¹⁴

While this is only an expectation and could be followed in a number of ways, the OfS stated in its Regulatory Advice that it takes a risk-based approach to regulating Condition E5, focusing “attention on providers where issues have been raised that suggest that the provider may not be cooperating effectively with EROs to facilitate electoral registration. This includes in particular complaints and evidence provided to us by EROs, as well as by students and their representatives. We may also consider compliance with this Condition as part of our approach to the random sampling of providers, or scrutinise more closely where there...[are] concerns about management and governance at a provider”.¹⁵

This effectively means that the OfS does not require higher education providers to demonstrate “delivery of actions” as recommended by the government, and it will only investigate where it receives complaints from the ERO or students, or where other aspects of management and governance are potentially failing.

The OfS takes a risk-based approach to regulation in general, but given that the government impact assessment highlighted that “the specificity of the Condition made is stand out from the others [which are] more principles-based”,¹⁶ there is a strong argument for the OfS to adopt a more rigorous monitoring approach in the case of Condition E5.

¹⁴ Department for Education, *Facilitating Electoral Registration: SoS Guidance to the OfS* (2017)

¹⁵ OfS, *Regulatory Advice 11: Guidance for providers about facilitating electoral registration* (2018)

¹⁶ Cabinet Office, *Student Electoral Registration Condition Evaluation* (2021)

A Student's Civic Journey

All the stakeholders we spoke to considered supporting students to register to vote a vitally important activity for universities. While the Condition E5 makes this a requirement, many universities were doing so well before the new regulations, and go over and above the minimum level. The impact assessment commissioned by the Cabinet Office found that two thirds of higher education providers (and potentially more) were already promoting registration to some extent.¹⁷

Their motivation does not generally stem from their regulatory duties, nor even from a desire to encourage students to vote for the sake of it. Rather, universities increasingly see themselves as having a key role in engaging students in civic life, a key part of which involves democratic participation.

Many are working with organisations such as the Civic University Network and Institute for Community Studies to embed civic aspirations throughout their institutional structures, teaching students to engage appropriately with the world and using universities' unique positions in their communities to drive positive social change.



¹⁷ Cabinet Office, *Student Electoral Registration Condition Evaluation* (2021)

University Activity Summary

The OfS Condition does not specify which activities universities should carry out to help students register to vote. Nor does it release formal guidance on what works or how to implement different initiatives.

The primary activities that universities carry out are listed to the right. 98% of universities do at least one of these, and 86% three or more.¹⁸

Activity can be carried out throughout the year, usually with a specific focus at or after enrolment and/or in the run up to elections.



Embed opt-in to register on enrolment forms (auto-enrolment)



Include link to government website on enrolment forms



Email students with registration information



Create an information page on university website



Promotion on social media



Print posters or leaflets with registration information



Run events or stalls on campus, unilaterally or with local EROs

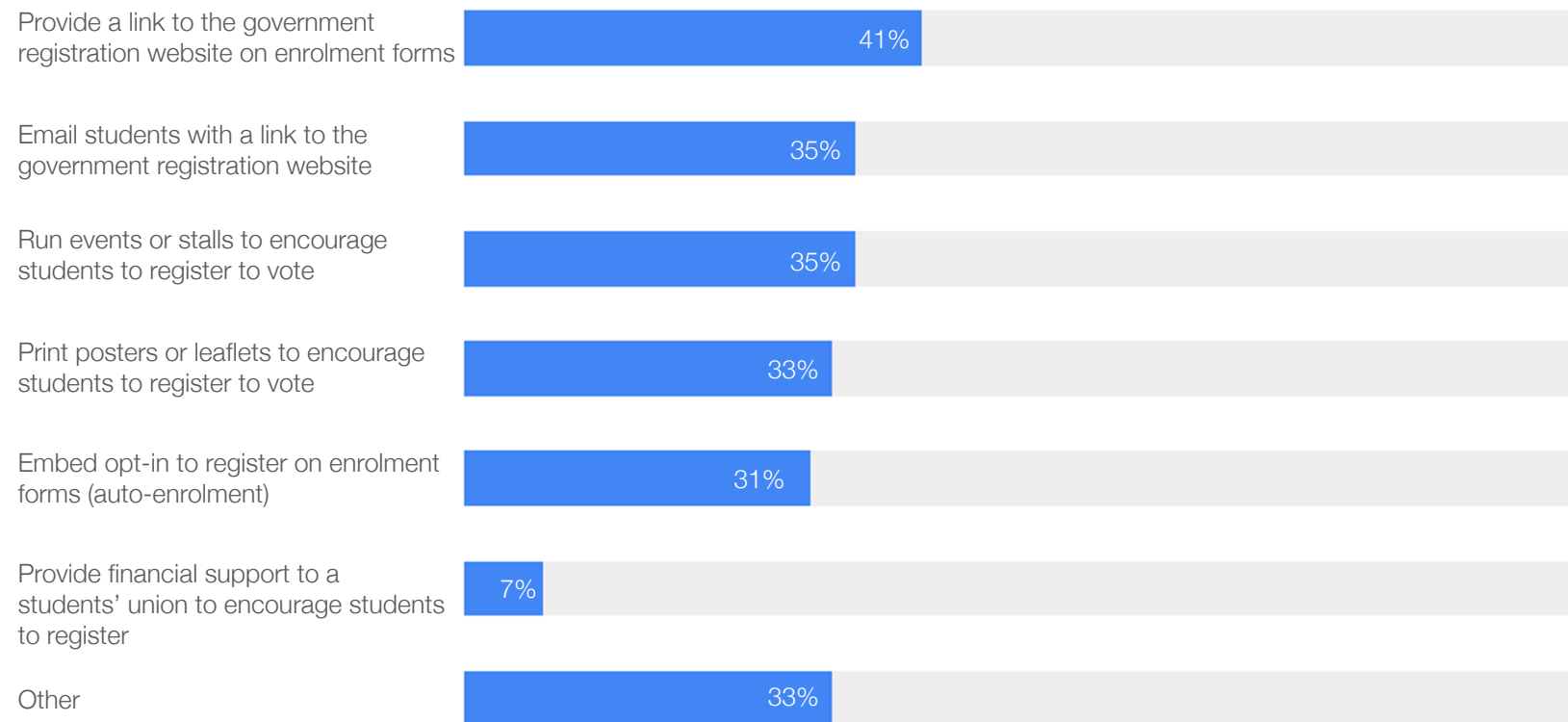


Pass student emails to ERO, which then sends an Invitation to Register (ITR)



Fund or work with the student union to run registration campaigns

Figure 3: Proportion of universities carrying out different types of student voter registration activity



Auto-Enrolment

Summary

Some universities provide students with an opt-in to register to vote automatically on enrolment forms, usually in the form of an online check box.

While some in the sector know this as the ‘Sheffield model’, there can be different versions of the model, so we have chosen to use the term ‘auto-enrolment’ when referring to this process.

31% of respondents to our survey had implemented auto-enrolment, and of those who hadn’t, 48% had considered it, or were actively working towards it.

Auto-enrolment is regarded by universities as having the most impact on student registration numbers (see Figure 4). The process differs slightly between institutions, but generally auto-enrolment involves embedding an opt-in to vote on enrolment forms that a student completes at the beginning of each year. The form can include:

- A check box to register to vote
- A check box to opt out of the open register
- A request for a National Insurance number (sometimes a required field)*
- Data protection statement of consent
- Information about registering to vote, including the fact that students may register at more than one address

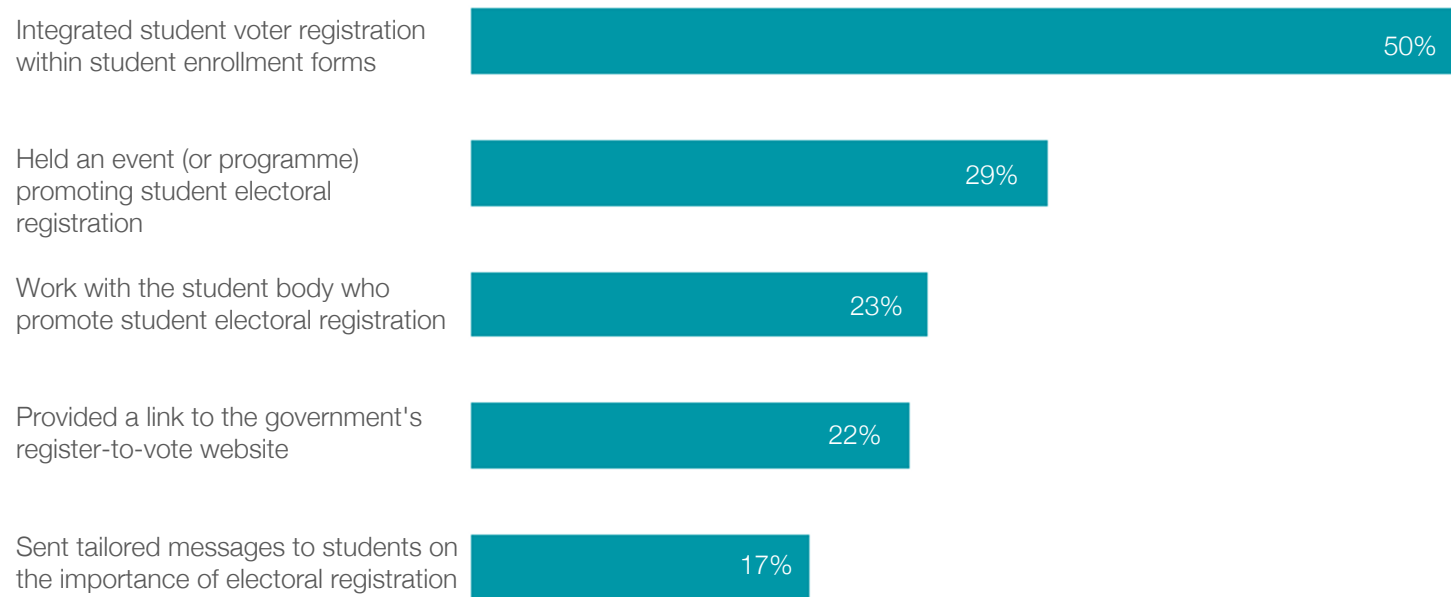
Once the student opts-in, the university sends their data to the ERO, who processes the registration under canvass Route 3 (where the university acts as the ‘responsible person’). The university is then usually required by their data protection policy to delete the data. Further data transfers may take place throughout the year, which is particularly valuable for universities that enrol students in January, March or on an ongoing basis.

Once the ERO has the data, they perform the verification process. If they do not have enough data, for example a missing NI number or incomplete address, they may go back to the university for more information, or contact the student directly (essentially moving them from Route 3 to Route 2). Some universities also provide the ERO with email addresses or halls of residence details of students to facilitate easier matching.

Understandably, auto-enrolment requires close cooperation between the university and the ERO, as well as a GDPR-compliant data sharing agreement.

*We discovered one instance of a more unusual method, where, for data protection reasons, the university does not pass on NI numbers but instead performs a verification process on behalf of the ERO.

Figure 4: Activities that are perceived by higher education providers as having the greatest impact on student registration



Auto-Enrolment Advantages

Creating the opt in was simple. We just needed to hijack three empty fields in Tribal [software provider]

There was a slight complication in making sure we set up criteria for which students get asked, but once you've done that once, it's easy

We implemented a step into our student enrolment in 2015.... It required an IT project so did cost to design and build. Now that it is up and running there are manual processes to extract and prepare data before sharing with [the ERO].

1. Impact

Auto-enrolment is seen as the most effective method of increasing student voter registration rates. Implementing the original Sheffield Model of auto-enrolment was estimated to have had the potential to increase registration rates from 13% to 75%¹⁹ and each year around 11,500²⁰ students at the University of Sheffield are registered this way (out of approximately 21,000 UK or EU students). Similarly, Cardiff University sees approximately 8,500 students register each year.²¹

2. Reach

At most universities, every student is required to enrol or re-enrol each academic year. Unlike emails or events on campus, this means universities can guarantee that every single student will be offered the opportunity to register or actively decline, hugely increasing the reach of such communications.

3. Administration

Once auto-enrolment has been implemented, the process largely stays the same each year and requires a low level of maintenance, mostly in the form of data transfers to, and liaison with, the ERO. While the data sharing agreement needs to be reviewed (in some institutions annually, others every few years), the principles remain the same so usually few changes are needed. Similarly, the technological changes required for auto-enrolment only need to be made once, unless the university changes its software provider. In fact, one university indicated changing software is a good time to implement auto-enrolment.

¹⁹ University of Sheffield, *Minister praises University's successful voter registration scheme* (2016)

²⁰ Ibid, *University of Sheffield number one university for outstanding student voter registration practices* (2019)

²¹ Association of Electoral Administrators, *Response to the consultation on the electoral administration and reform* White Paper (2022) **29**

Auto-Enrolment Advantages

This year we are planning to make tweaks to our data sharing agreements to make matching electoral records easier.

We are a well-funded research university so we have put together a taskforce to set it up this year. Less well-funded universities may struggle.

The payment we receive isn't huge but it's enough to cover our investment in the process.

4. Efficiency

Auto-enrolment is an efficient option for both universities and EROs. It means students only have to fill in one form, at a time when they are providing other essential information, and the majority of students enrol in the autumn, coinciding with the annual canvass. This allows EROs time to focus their attention on students who did not register. Since many students move each year, auto-enrolment captures their most up-to-date address. We know that frequently moving house makes someone less likely to register so, auto-enrolment can help to mitigate this.

5. Measurement

A further advantage of auto-enrolment is that, in theory, both the university and the ERO can count the number of registrations through this route, enabling them to accurately measure its effectiveness and track the impact of improvements to the process. Such assessment is much more difficult with other registration activity like events on campus, and virtually impossible in the case of linking to the government registration website.

6. Cost

Far from costing universities more, we know of a number of EROs that actually pay institutions a small fee - generally in the low £1,000s - for carrying out auto-enrolment, to cover the staff time involved in implementing and maintaining the process. Additionally, EROs have highlighted that auto-enrolment can save them money: The Sheffield Model was estimated to have saved Sheffield City Council £160,000 p.a.²² However it must be noted that this figure was calculated before the reform of the annual canvass and does not include increased staff costs for the time liaising with the university and processing the data, so the overall savings, while still positive, are likely to be substantially lower.

²² Electoral Commission, *What works: Encouraging Students to Register*

Auto-Enrolment Challenges

We would not wish to commit funding to this but would consider options if easy to do and at no cost.

Our enrolment process uses rather 'hard wired' functionality that is difficult to change.

We are very stretched and would need a very simple framework to enable us to do this

We need our software houses to be fully onboard with this so that it can be an easy and integrated part of the journey.

1. Perceived complexity and cost

University teams who had implemented auto-enrolment report that the process was mostly straightforward, but many of those who had not cite worries about the complexity of doing so. With a lack of guidance in the sector, each university that wishes to implement auto-enrolment has to reinvent the wheel every time, a particular challenge for less well-funded institutions with fewer staff. Although many universities actually received a fee from the ERO, this is not widely known and the perceived costs are also a barrier.

2. Integration with enrolment software

Implementing auto-enrolment requires some adjustments to the university's student records system. However, there is no one solution that suits all. Over 60% of HE providers in the UK use Tribal SITS, with the remaining using systems such as Ellucian Banner, SAP and Oracle. Larger universities may have in-house development teams who can make the necessary adaptations, but smaller ones may find it more of a challenge.

3. Working with EROs

A good working relationship between the university and ERO is essential. For universities where the majority of students live within the boundaries of one local authority, this is fairly straightforward. However, many universities do not have this profile: they have students commuting in from neighbouring boroughs or living in HMOs or other private accommodation across a wide area. Arranging data sharing agreements and ongoing liaison with multiple local authorities is a significant challenge, particularly without any standardised agreements or data formatting and transfer. We have only come across one university that has a data sharing agreement with more than one ERO and they said consistency was a challenge as each has slightly different expectations and timelines.

Auto-Enrolment Challenges

The main issue has been collecting correct addresses as many students live in flats within larger building complexes. To overcome this we have purchased an address look up finder tool.

Much of the information is already required for registration which helps - it's the NI numbers which are problematic.

Our students come from many different boroughs so we would need to pass on details to many different EROs.

Following discussions with our Local Authority we produced and signed a data sharing agreement, but the Local Authority did not sign it. The reason for this is not known.

4. Collecting the data

Universities that have implemented auto-enrolment found collecting the right National Insurance (NI) data and postal addresses the biggest challenge (see Figure 5a). Although EROs can verify data via other means, this is more time consuming, so some insist on making NI number a required field on the online form, leading to a potential drop off as many students do not have their NI number to hand..

Other students do not provide the correct address, with some putting down the address of the university or the name of their halls of residence, possibly because they do not know it at the beginning of the year or, for some, as they live in illegal HMO accommodation. This problem can be alleviated by inserting an address finder, asking students to check and update their address details at moments throughout the year, and/or providing list of hall residents to the ERO to facilitate matching.

5. Sharing the data

Each university we spoke to had a data sharing agreement with their local ERO, all with slight variations: some shared NI numbers while others did not; some sent data straight to a portal, others by encrypted file. These differences are generally attributable to GDPR interpretations, the software used by both parties or the preferences of individual staff.

One participant highlighted an initial over cautiousness within the sector when GDPR was introduced but that since then, universities have had time to become accustomed to the regime. However, a government evaluation raised concerns that many HE providers were “not aware of their legal duty to comply with EROs’ requests for data they believe is required for complete and accurate registers” as required under regulation 23 of the Representation of the People Act 2001.²³

²³ HM Government, *Every Voice Matters: Building A Democracy That Works For Everyone* (2017)

Auto-Enrolment Challenges

Communication is a real challenge when you embed it into the reg form as we need to rely solely on what's written in the form itself.

It creates an expectation that we can "localise" enrolment for other demands and services.

At present our activities are in line with OfS guidance.

Automatically registering someone to vote as part of a totally separate process (ie joining a university) seems to be inappropriate.

6. Measuring impact

While we outlined this as a theoretical benefit, in reality most universities do not routinely measure the number of students registering through auto-enrolment each year. 90% of respondents to our survey could not reliably tell us the proportion of students who register via auto-enrolment. For those that could, estimates ranged from 4-80% of students registering, indicating a potential wide variability in monitoring practices. Measuring registration rates through auto-enrolment should be extremely easy, but university teams would need to see a value in recording this information and using it to improve the service over time. Boards of governors could have an oversight role to play here.

7. Confusion for students

A number of research participants we spoke to remain concerned around potential confusion for students on whether they are able to register in two places, as is permitted under the rules. Universities using auto-enrolment tend to explain this on the form but some still report a drop off. This could be mitigated by testing forms to ensure the information is clear and supplementing auto-enrolment with other communications to those who haven't registered, such as email.

8. Staff resistance

A small number of institutions who had not implemented auto-enrolment informed us they either believed their compliance with the OfS guidance meant they did not need to go over and above their legal duties, or that auto-enrolment would either be inappropriate or inconvenient for the institution. While this may be an issue for specific universities, the vast majority of staff we interviewed and surveyed were supportive of auto-enrolment, regardless of their statutory obligations.

Figure 5a: Challenges that university staff have encountered in offering auto-enrolment to students

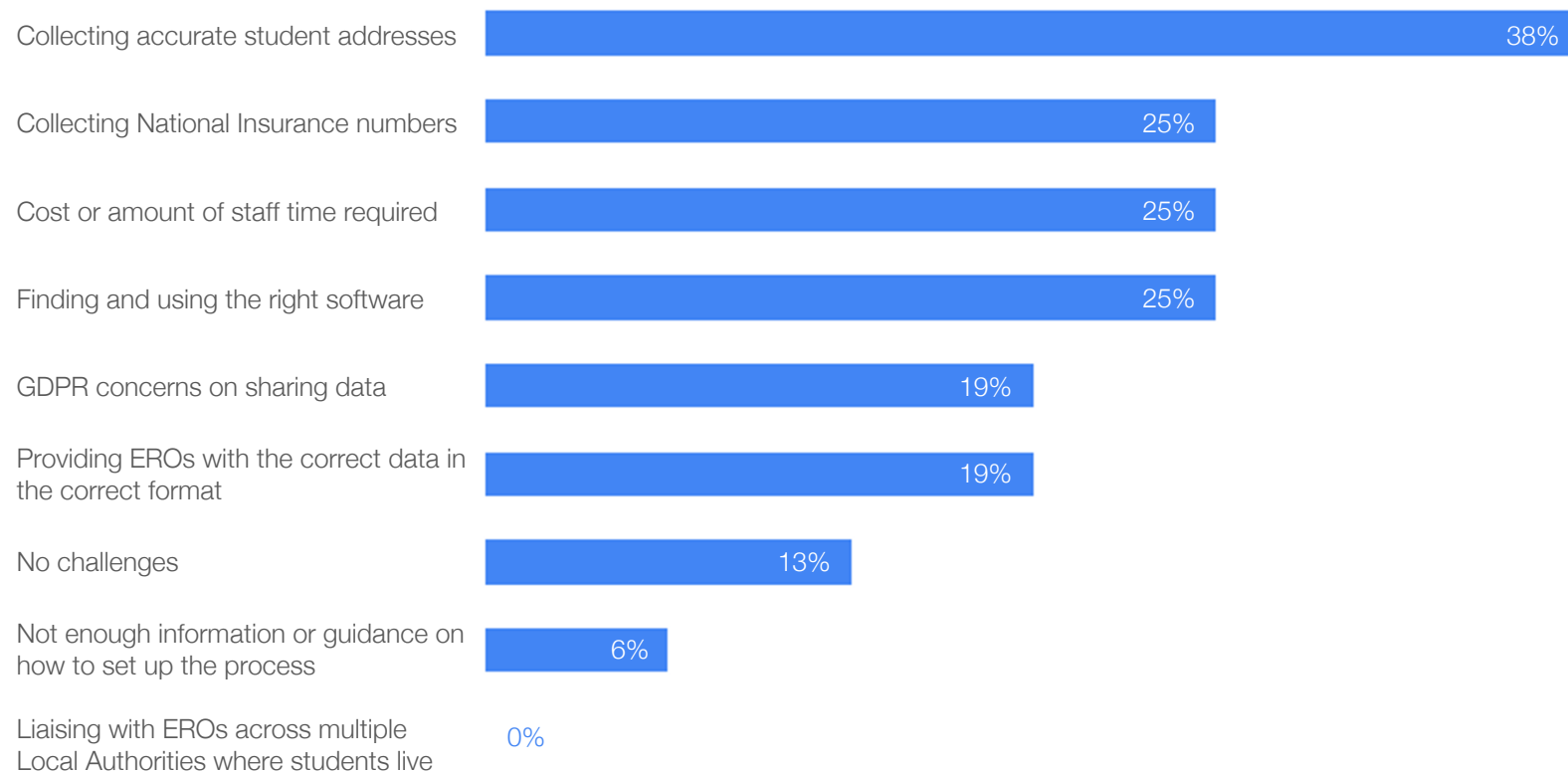
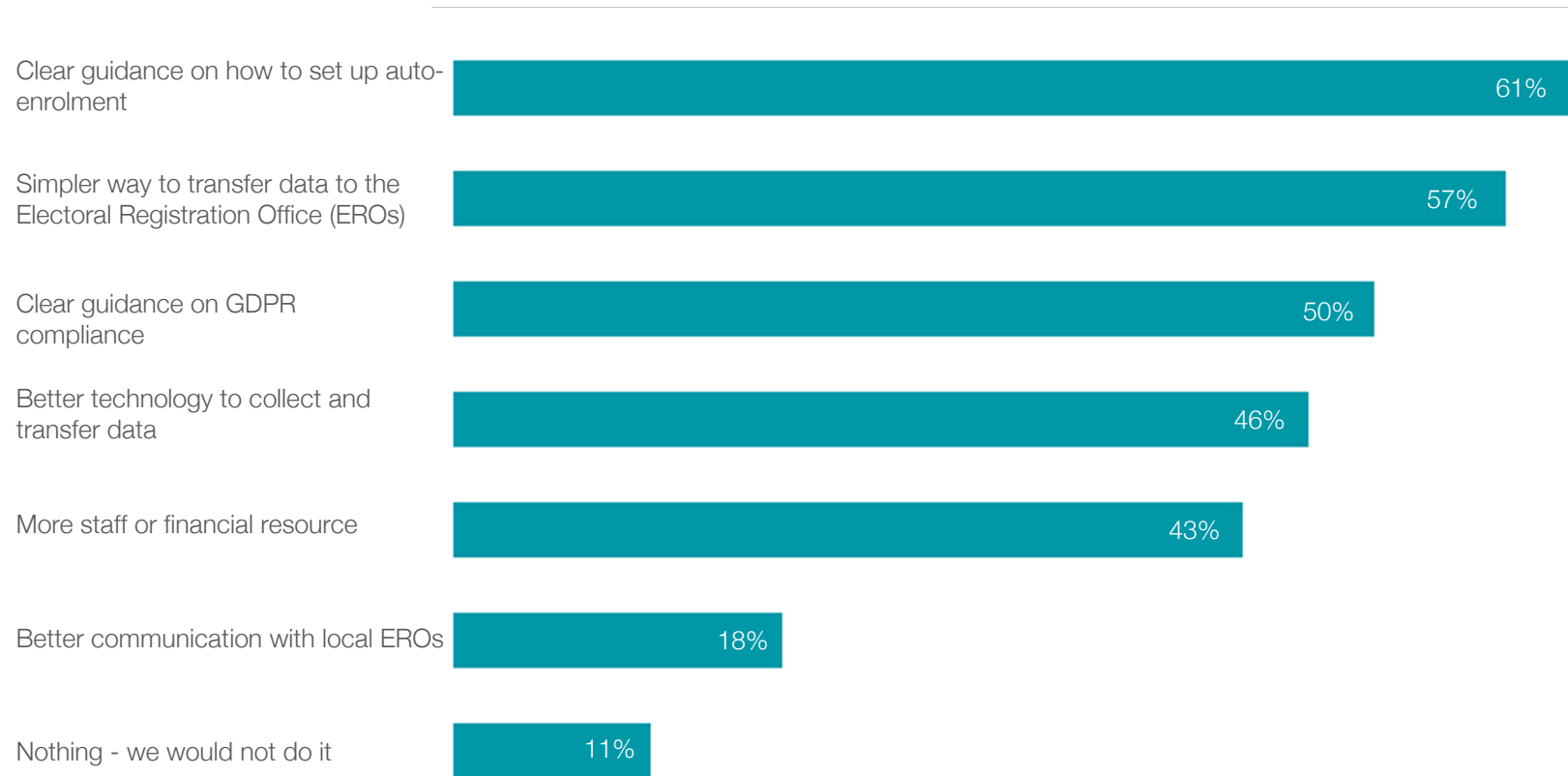


Figure 5b: Interventions that would make university staff choose to implement auto-enrolment



University Activity

Jisc Alternative

Jisc is a UK-based digital, data and technology agency providing products and services to the higher and further education sectors.

Jisc created an alternative to auto-enrolment in 2019. Developed in consultation with the Academic Registrars Council and the Association of Heads of University Administration, the service created a simple way for students to register to vote through centralised data collection and processing, without the need for bilateral agreements and time-consuming secure data transfers between universities and EROs. The service was also able to alleviate the problem facing universities with students living in multiple local authorities.

Participating universities were provided with a voter registration link to a web app, which they could promote at their discretion, including on enrolment forms, websites and emails or via printed QR codes on posters.

The link led the student to a portal pre-populated with data from their student records (such as name, address and DOB), a space to add their NI number and a consent to share data. On submission, the data was shared with EROs automatically, who were able to download it from a portal, which was cleared every 28 days for data protection.

Approximately 35 universities and 114 local authorities signed up to the service. There was excellent uptake from a small number of institutions but unfortunately most did not receive significant numbers of registrations through the service. Over 4 years, a total of 60,000 students attempted to register, with around half unable to do so because their ERO was not signed up to the service.

As a result, Jisc made the difficult decision to retire the service, which will close in July 2023. They would have liked to continue, but given the tool was not a core funded service and the relatively low usage and uptake, it was no longer possible to justify maintaining it.

University Activity





Jisc Alternative

Elements of the Jisc web app user experience are shown to the right.

POWERED
BY 

Register to vote

If you can answer "yes" to all these questions, we can help you register to vote.

-  Are you aged 16 or over?
-  Are you a student studying and living in the UK?
-  Do you have a national insurance number?
 You may need this to register

 If you have answered no to one or more of these questions, you are not eligible to use this service.

> Start Now

Jisc

Your Higher Education provider

First, please tell us the name of your Higher Education provider. If you have logged in previously, you can select your provider by clicking on their logo.

Start typing the name, e.g "Oxford University" and options will appear below.

Select your organization from the list below

Please select your organization...  [Continue](#)

[Allow me to specify the site](#)

[Help](#)

University Activity

Jisc Alternative

We have been using the Jisc Voter Registration process through registration but it is closing down so we will now need to find an alternative.

Our students have registered at over 50 EROs. It would help to have a replacement for Jisc.... Without this, we may be only signposting them to the Govt Website and hosting stalls, posters etc

The withdrawal of Jisc is leaving a hole in what we are able to provide to students in terms of registration.

This will clearly have an impact on the institutions still using the service. Our research has revealed several will either have to put together a plan to implement auto-enrolment themselves or will no longer be able to offer any such service to students, relying instead on directing them to the government website. The impact is likely to be particularly high for universities with students living in multiple EROs, as creating the bilateral agreements needed for auto-enrolment with many local authorities will be near impossible.

Understanding why the Jisc service did not lead to higher uptake can provide insight that may be of use in case a software provider is able to offer a similar product in future. It is our understanding that elements of the service that can be archived will be preserved.

Cost - although Jisc wanted to make the service as accessible as possible, it was not core funded and therefore a small fee in the low £1,000s was levied on the universities, on a sliding scale depending on the size of the institution. For EROs, the service was free. This may have not been so appealing to universities who were able to broker a bespoke agreement with their local ERO, as that usually involves a fee paid to the university.

Best practice usage - universities could choose how they promoted the portal, and may not have included it on enrolment forms, preferring instead to put the link on their website or posters, which would likely lead to a lower number of registration. This may have been due to a lack of awareness about best practice or a reluctance to add more stages into the enrolment process.

Network effects reliance - for the process to be worthwhile, universities needed to know many local authorities were using it and vice versa. We understand both sides were reluctant to commit unless there was higher uptake.

University Activity

Jisc Alternative

Much of the information is already required for registration which helps - it's the NI numbers which are problematic. We have a low success rate of students who click through to complete the form with Jisc but then don't successfully register with an ERO. I was never able to get further info as to why they were failing at that point.

We were previously using the Jisc service but it made very little difference in getting our students registered to vote. We need to make the whole process substantially easier

User Experience - the service required students to be taken to a separate web app, moving them away from the enrolment forms. This could have been confusing for some students and lead to drop off at this stage. Further, the service original had NI numbers as a required field, which could have resulted in fewer registrations. Jisc subsequently made NI numbers optional, which improved the UX.

Awareness among EROs - local authorities that do not have a university in their boundaries may have not seen the value in registering with Jisc, or be familiar with the process of canvassing students. We view this as a missed opportunity as many students commute to university from neighbouring boroughs or study remotely. Additionally, Jisc is not a key service provider to local authorities, so when signing up EROs they found it difficult to establish the right links into the sector and did not have the pre-existing reputation as a valuable provider that they have among universities.

Complexity for EROs - electoral services teams may have been concerned about the need to log into a separate portal at least every 28 days simply for the purpose of registering students, which would have been time consuming and potentially risky from a data protection point of view. Jisc did approach the Government Digital Service to establish whether data they collect could be automatically matched against DWP records and sent straight to the ERO in the same way as registrations via the government website, alleviating the need for a separate portal. Jisc also looked at integrating the service with the software used by EROs to streamline data processing. They did have encouraging conversations with some providers but by that time they were nearing the decision to retire the service so this was not pursued further.

Case Study: University Auto-Enrolment

A Russell Group university with a traditional halls of residence model and all campuses within one local authority area.

The university has been using auto-enrolment for four years, having been approached by their local authority. They were previously using Jisc but reported that embedded auto-enrolment had a higher success rate. Despite using auto-enrolment, they still only register around 36% of their students each year, which they believe may be due to the user experience, including the requirement to provide a National Insurance number, as well as the possibility that students do not know they are able to register at home and at university. Consequently they are working on improvements to the process.

During initial conversations with the ERO, they were wary about the GDPR implications of collecting NI numbers, but having investigated options, they were reassured that they would be compliant if they deleted the data after it had been sent over to the ERO.

The enrolment form consists of two parts,: the first part contains everything that is essential for enrolment (or re-enrolment) onto a course, while the second contains additional support and information, for example registering with a doctor and booking summer experiences. The voter registration auto-enrolment is in this second part.

Once the students have opted-in to registration, the university sends the data to the ERO, which had provided a template for formatting the encrypted data file. The university also shares details of the students' right to study, which helps with the verification process.

The staff identified the most important part of the process of auto-enrolment as making sure data protection is robust and always followed. Their in-house data protection team needs to sign off any updates to the data sharing agreement with the ERO and the processes that are followed internally to ensure compliance.

Case Study: University

No Auto-Enrolment

A University Alliance member with a large student population in a city with students living across a number of local authority areas.

The university does a wide range of activity to help its students register to vote. They have been using Jisc as part of the student enrolment journey, and prior to that included a link to the government registration website. However with the retirement of Jisc they are unsure how they will continue to offer registration during enrolment, other than by going back to what they were doing before.

They would like to implement auto-enrolment but as they are concerned they will not be able to make the necessary customisations to their student records software (Banner). An alternative might be to facilitate greater access to university accommodation to allow the local ERO, with whom they have a good working relationship, to canvass students on site.

Outside of enrolment, they encourage and sign post to registration throughout the student induction journey, including through fairs, on their central website and the students' union website. They ran a large communications campaign in the run up to the 2019 General Election and more recent regional mayoral elections.

The staff do have concerns that not all students are reached by their activity as around a third live at home and therefore are not often on campus. They are also worried about ensuring international students who do have the right to vote (for example those from qualifying Commonwealth countries or the Republic of Ireland) are made aware of this and know how to register.

Case Study: ERO

Auto-Enrolment

A city council containing two universities and a small campus of a third, whose main hub is within a neighbouring local authority.

The council does not have local elections this year, which is unusual, allowing the team time to make improvements to the process.

On learning about the Sheffield Model a number of years ago, the ERO wrote to all the vice chancellors of the three universities with campuses within the local authority boundaries, inviting them to work together to introduce auto-enrolment.

They have since worked on auto-enrolment with one of the universities in their area along lines similar to the Sheffield Model. The university also shares complete lists of students living in all halls of residence so the ERO can match incomplete records more easily.

The ERO has more recently established an agreement with a second university that does not involve auto-enrolment but where the university shares data of its students, which the ERO uses to register students where they can match the data and verify the identity. This is outlined in the university's privacy agreement.

The third university, which is based outside the local authority but has a campus within it, previously worked with the ERO on data sharing but they stopped doing so as they said it was confusing their students.

The ERO is keen to further improve the system and is currently planning to review:

- The student journey on the enrolment forms as they would like to see a higher percentage of completions.
- The data sharing agreements as they would like the universities to include email addresses so that when they are unable to verify a student's identity, they can contact them for additional information. They would also like Unique Property Reference Numbers, but are less certain about the feasibility of this.
- How to move students living in HMOs from Route 2 to Route 3 by working directly with other council teams, large private providers and letting agents.

Case Study: ERO

No Auto-Enrolment

A local authority forming the central part of a large city, containing two universities within its boundaries.

A further three universities are located within the wider metropolitan area but is not known how many students may commute from within the local authority.

The ERO reports having excellent relations with both universities, liaising with senior figures in each. Since COVID prevented staff members being able to conduct the annual canvass on campus, they introduced data sharing agreements with both universities, under which they send the ERO a list of all students' university email addresses (but not postal addresses), permission for which is given via the universities' privacy agreements.

The ERO then emails students an Invitation to Register (ITR), providing a link to government website and details about upcoming elections. While data on registrations cannot be routinely recorded, the ERO estimates registrations as a result of this email to be in the low 1,000s for an email list of 20,000.

Alongside the email, the ERO staff work with the university communications teams to put out messages about registration on social media and the university website, and to run face-to-face registration activity on campus. Stalls are set up at welcome events where students come to collect their keys and at halls and libraries during reading week. The latter was viewed to be the most successful activity, with approximately 1,000 students signed up during reading week from both universities.

The ERO reported that it can be difficult to sign students up when they collect their keys as the process takes quite a while on a day where the student is extremely busy. They also found many students did not have their National Insurance number to hand, which was a barrier to face-to-face registration and would suggest the university advertises days when the ERO will be on site and prompts students to bring their details.

The ERO has not investigated auto-enrolment and, when asked about the possibility of introducing it, said they would still need to issue an ITR once they got the data anyway.

RECOMMENDATIONS

A photograph of three students (two women and one man) sitting on a stone ledge outdoors on a university campus. They are looking at a laptop held by the man. The woman on the left is wearing a black blazer and glasses. The man in the middle is wearing a plaid shirt and glasses. The woman on the right is wearing a dark t-shirt. There are backpacks on the ground next to them. In the background, there is a large brick building with many windows and some trees. The word "RECOMMENDATIONS" is overlaid in large white capital letters across the center of the image.

Recommendations

Summary

Our findings show the most effective approach would be for universities and EROs to invest in implementing auto-enrolment.

With a sector-wide, coordinated approach, we believe this could increase levels of student voter registration across the country.

1/ Improved Guidance

A comprehensive, easy to use guide is created and distributed to assist university teams who wish to implement auto-enrolment.

2/ Standardised Data

All local authorities across the UK to adopt a single view of the data required by EROs from universities and a standard data sharing agreement and format for information to be transferred, with room for flexibility depending on software.

3/ Software Provision

Providers of student records software, particularly Tribal, offer an auto-enrolment integration, allowing university staff to easily update forms and collect data.

4/ Role of EROs

All EROs proactively reach out to universities in their area, as well as neighbouring ones, suggesting working together to implement auto-enrolment.

5/ Role of Universities

All universities in England commit to introducing auto-enrolment for their students to register to vote and begin implementation as soon as practicably possible.

6/ Measuring Impact

All universities using auto-enrolment measure the proportion of students registering to vote through their system, track improvements and share learnings with the sector.

Recommendation 1

Improved Guidance

We recommend a comprehensive, easy to use guide is created to assist university teams who wish to implement auto-enrolment.

The guide should include clear instructions on the process, options for different types of auto-enrolment for staff to choose to suit their institution, data on impact, template data sharing agreements, examples from other universities and signposting for additional support.

Ideally, it would be created by the OfS and updated regularly as new information on best practice becomes available. A majority (59%) of institutions are aware of Condition E5 directly from OfS communications so it would be more efficient for such a guide to be centrally owned.

In addition, we recommend relevant sector professional associations and representative bodies share the guide among their members and facilitate training and peer-to-peer learning on the topic.

If we were given more information about what to do and how to do it, we would do more.





Recommendation 2

Standardised Data

We recommend that all EROs across the UK adopt a single view of the data required from universities and a standard data sharing agreement and format for information to be transferred, with room for flexibility depending on software.

Data collection and sharing is reported to be one of the biggest challenges facing universities in implementing auto-enrolment. There appears to be confusion from EROs on whether or not key data such as National Insurance numbers are required, and some teams report uncertainty around GDPR compliance.

Where complete standardisation is not possible, we suggest that universities located near one another work together with the relevant EROs to forge local multilateral agreements. For large metropolitan areas with many universities across multiple local authorities, such as Manchester, Birmingham and London, a regionally coordinated approach should be instigated by local government and HE leaders.

Our students come from many different boroughs across London so we would need to pass on details to many different boroughs.

Recommendation 3

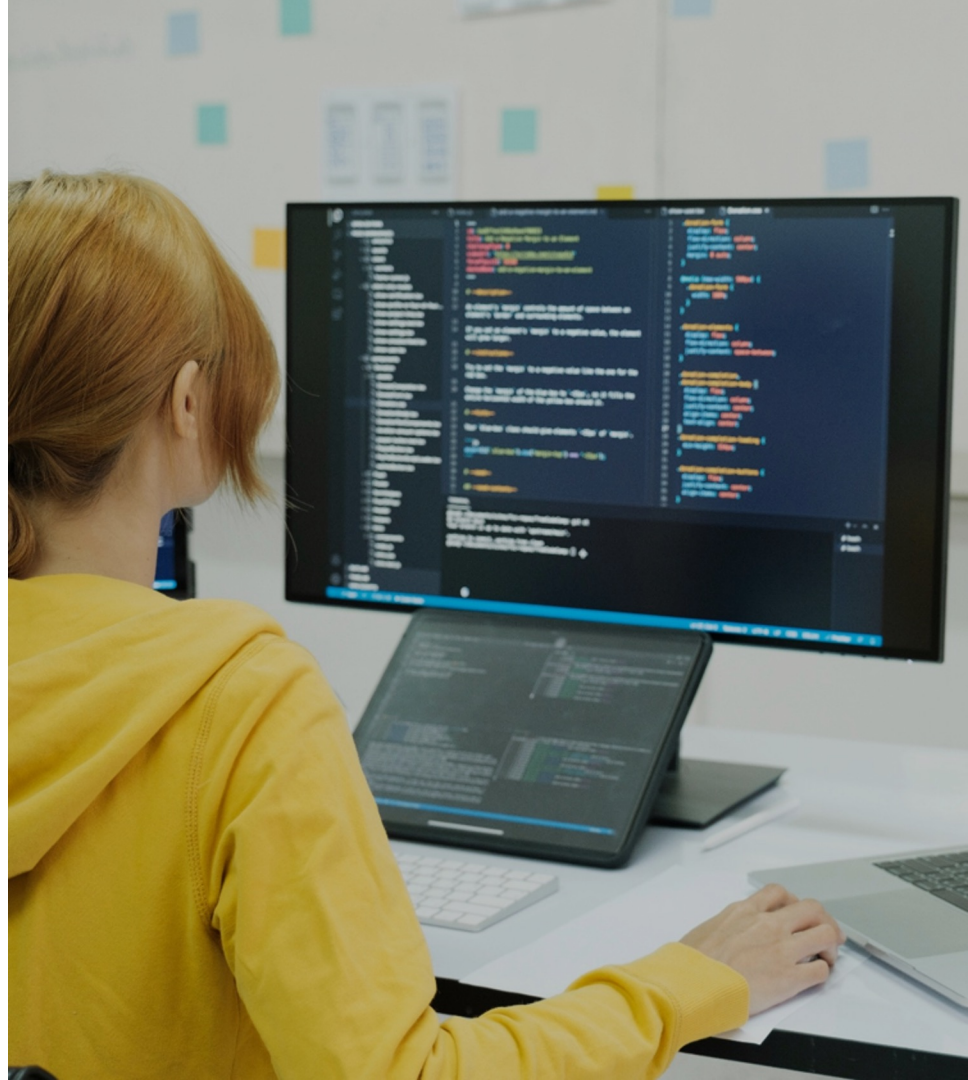
Software Provision

We recommend providers of student records software, particularly Tribal, offer an auto-enrolment integration, allowing university staff to easily update forms and collect data.

Simplifying the technological aspect of auto-enrolment would make it more attractive to some university staff, particularly those without large in-house development teams.

We also recommend student voter registration is included in core funding for Jisc, enabling it to offer a revised service that can be fully integrated to student records and electoral registration software, along with efforts from the Electoral Commission and OfS to get as many EROs and universities to sign up to it as possible. We further suggest the Government Digital Service work to enable secure access to its national verification system, making the process much simpler for EROs.

We would need to make a number of changes to our system. It is not really about money but about time and access to the necessary skilled resource.





Recommendation 4

Role of EROs

We recommend advising EROs to proactively reach out to universities in their area, as well as neighbouring ones, suggesting working together to implement auto-enrolment.

EROs have a statutory duty to ensure their register is as up to date as possible. This will naturally include working to ensure students are registered to vote, both through the annual canvass and through engaging directly with universities. Many EROs already put a huge effort into registering students. We believe auto-enrolment will help them achieve even greater impact.

EROs should receive guidance - we suggest from the Electoral Commission - on how to engage with university teams, the preferred data requirements and format, GDPR compliance, and potential cost savings. This will be particularly valuable to smaller Electoral Services teams with fewer staff than in larger districts.

We took an open-minded approach from the beginning and were happy to engage with our ERO. We didn't want to rush into it but both of us knew what we were aiming for. It wouldn't have happened without that good relationship.

Recommendation 5

Role of Universities

We recommend all universities in England commit to introducing auto-enrolment for their students to register to vote and begin implementation as soon as practicably possible.

Universities across the country are proud of the role they play in engaging students with their civic journey. This involves a whole range of activity and initiatives. We believe improving voter registration among students is just an extension of this vital work.

For those who already offer auto-enrolment, we recommend they regularly review the process to make improvements and reach out to neighbouring institutions without auto-enrolment to offer assistance.

We know vice chancellors, students' unions and boards of governors will be critical voices in championing the issue with staff and we suggest they put it on their agenda as quickly as possible.

As a responsible public sector organisation it is part of our values to engage students in democracy and the local community.





Recommendation 6

Measuring Impact

We recommend universities using auto-enrolment measure the proportion of students registering to vote through the system. This will allow them to track data over time, make improvements and measure the impact on registration numbers.

Given the role of universities in engaging students with civic life, routinely recording the number of students registered to vote should be a high priority, not just for individual universities but for the sector as a whole.

We suggest university boards of governors include registration data in their annual risk reviews and make public such data to create a sector-wide understanding of best practice.

We further recommend the Electoral Commission commit to measuring student voter registration in its next review of the accuracy and completeness of the electoral register, due to start in 2023. This will enable EROs, particularly those with high numbers of students in their area, to better understand the challenges to their teams and target resources accordingly.

[If] there was clear data to show its effectiveness, we are very likely to do it.

A photograph of a person walking away from the camera down a long aisle in a library. The aisle is lined with tall bookshelves filled with books of various colors. The person is wearing a dark jacket and a backpack. The word "APPENDIX" is overlaid in large white capital letters in the center of the image.

APPENDIX

Acknowledgements

We would like to thank the following individuals and organisations who have helped make this research possible.

Academic Registrars' Council
Andy Mycock, University of Huddersfield
Association of Electoral Administrators
Association of Heads of University Administration
Association of University Administrators
Committee of University Chairs
Democracy Club
Jim Dickinson, Wonkhe
Jisc, current and former members of staff
John Dubber, University College London Students' Union
Jon Lees, De Montfort University
Kat Stark, National Union of Students
Neil McKenzie, Leeds Beckett Students' Union
Toby James, University of East Anglia

And all the staff at universities, students' unions and local authorities who participated in our research.



Glossary of Terms

Academic Registrar: An Academic Registrar is often a University's senior responsible officer for advice and guidance on matters of student administration (including systems and processes), student misconduct and complaints. In some universities, this function is performed by a Director of Student Services or Chief Operating Officer.

AEA: The Association of Electoral Administrators represents professionals involved in electoral administration.

AHUA: The Association of Heads of University Administration is a member-led professional body for senior University managers in Higher Education.

Annual Canvass: The Annual Canvass is a survey carried out by local authorities from June-November to ensure that everyone who is eligible to vote is included on the electoral register so they can take part in democratic processes. The updated electoral register is published on 1 December.

ARC: The Academic Registrars Council is the national forum of senior managers responsible for the academic administration of student matters in publicly funded Universities and Colleges of Higher Education within the UK.

AUA: The Association of University Administrators is the professional association for higher education administrators and managers.

Condition E5: The provider must comply with guidance published by the Office for Students to facilitate, in cooperation with electoral registration officers, the electoral registration of students.

EROs: Electoral Registration Officers collect and use information about residents to enable us to carry out specific functions for which we are statutorily responsible. In practice, an ERO's duties may be carried out by appointed staff within Electoral Services Teams. As such, when this report uses the term 'ERO', it is referring to anyone who is carrying out an ERO's duties on their behalf.

HE: Higher Education

IER: Individual Electoral Registration was introduced in 2014 as a replacement for the household voter registration system.

Jisc: Jisc is a not-for-profit digital, data and technology agency focused on tertiary education, research and innovation in the UK.

OfS: The Office for Students is an independent public body acting as the regulator and competition authority for the higher education sector in England.

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