

The Auditor-General
Audit Report No.42 2001-02
Performance Audit

Integrity of the Electoral Roll

Australian Electoral Commission

Australian National Audit Office

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of Australia 2002

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Canberra ACT
18 April 2002

Dear Madam President
Dear Mr Speaker

The Australian National Audit Office has undertaken a performance audit in the Australian Electoral Commission in accordance with the authority contained in the *Auditor-General Act 1997*. I present this report of this audit, and the accompanying brochure, to the Parliament. The report is titled *Integrity of the Electoral Roll*.

Following its tabling in Parliament, the report will be placed on the Australian National Audit Office's Homepage—<http://www.anao.gov.au>.

Yours sincerely



P.J. Barrett
Auditor-General

The Honourable the President of the Senate
The Honourable the Speaker of the House of Representatives
Parliament House
Canberra ACT

AUDITING FOR AUSTRALIA

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Abbreviations/Glossary

ABS	Australian Bureau of Statistics
AEC	Australian Electoral Commission
AEO	Australian Electoral Officer
APS	Australian Public Service
ASIO	Australian Security and Intelligence Organisation
CE Act	Commonwealth Electoral Act 1918
COA	Change of Address
CRU	Continuous Roll Update
DIMIA	Department of Immigration and Multicultural and Indigenous Affairs
DoB	Date of Birth
DRO	Divisional Returning Officer
DSD	Defence Signals Directorate
HIC	Health Insurance Commission
JSCEM	Joint Standing Committee on Electoral Matters
MOU	Memorandum of Understanding
RMANS	Roll Management System
VEC	Victorian Electoral Commission

Summary and Recommendations

Summary

Audit background

The Australian Electoral Commission

1. The Australian Electoral Commission (AEC) is an independent statutory authority established in February 1984 under the *Commonwealth Electoral Act 1918 (CE Act)*. AEC responsibilities include:

- managing federal parliamentary elections;
- maintaining the Commonwealth electoral roll; and
- providing registration, funding and disclosure services to parties and candidates.

The electoral roll

2. The Commonwealth electoral roll lists the names and addresses of people entitled to vote in federal elections. At close of rolls for the federal election on 10 November 2001, there were over 12.6 million people registered on the electoral roll.

3. The integrity of the electoral roll is essential for the conduct of free and fair elections. By providing a reliable list of qualified electors, the electoral roll assists in ensuring that those who are entitled to vote can do so, and that electors cast their vote in the correct electoral Division. The electoral roll is a key, legislatively created instrument for ensuring that Australia's democratic form of government functions effectively.

4. An electoral roll with high integrity also ensures that the AEC can manage elections effectively and serves to maintain the confidence of citizens in Australia's electoral system.

Audit objectives and scope

5. The objectives of the audit were twofold. The first objective was to provide an opinion on the integrity of the electoral roll.

6. In addressing this objective, the ANAO defined integrity of the roll as having four elements:

- accuracy—the electoral roll contains correct and up-to-date information relating to individuals;

- completeness—the electoral roll includes all individuals who are eligible to enrol;
- validity—the electoral roll includes no-one ineligible to enrol; and
- security—the electoral roll is protected from unauthorised access and tampering.

7. The second objective was to examine the effectiveness of AEC management of the electoral roll in ensuring the roll’s accuracy, completeness, validity and security. In particular we aimed to identify and assess the mechanisms the AEC has in place to provide assurance that:

- the names and addresses on the electoral roll are legitimate and valid; and
- people who are eligible to vote are registered, and registered correctly.

8. The scope of the audit included a review of AEC policies and procedures for managing the electoral roll and their implementation by AEC State and Divisional Offices. In reviewing AEC management of the electoral roll, particular attention was paid to:

- strategic relationships between the AEC and its major stakeholders, where these could affect the outcomes achieved for the electoral roll;
- the Continuous Roll Update (CRU) process — the AEC’s current approach to ensuring the accuracy, completeness and validity of the roll; and
- the adequacy of security and access arrangements to protect electoral roll information from tampering and unauthorised use.

9. The audit commenced in May 2001, with fieldwork conducted between May 2001 and February 2002. In addition to file and document reviews, the ANAO conducted interviews with staff in the AEC Central Office in Canberra, State Head Offices (HO) in all State and Territory capitals, Divisional Offices in New South Wales, Queensland, Victoria, Western Australia and the Australian Capital Territory. The audit team also spoke to State electoral authorities in all States and Territories, the secretariat of the Joint Standing Committee on Electoral Matters (JSCEM) and the secretariat of the Electoral Council of Australia.

10. As part of the review of AEC roll management procedures and their effectiveness, the ANAO conducted independent testing of the roll, matching data on the electoral roll with data from the Health Insurance Commission (HIC) and other relevant sources.

11. In the independent test of the roll, the ANAO recognised that there are limits on the extent to which results derived from data-matching can be relied

on. These limitations were compounded by the scale of this project, where 12.6 million current AEC electors were matched with over 18.4 million current Medicare records. AEC and HIC databases were created for different purposes and each groups its records under different categories. In particular, the HIC database contains information on Australian *residency* status rather than Australian *citizenship*. This results in Medicare data containing a significant proportion of people ineligible to enrol.

12. Nevertheless, matching the electoral roll with Medicare data provided one means of independently reviewing the accuracy, completeness and validity of the roll; obtaining information not otherwise available to Parliament; and improving Commonwealth administration of the roll. The ANAO benefited from the assistance and expertise of data managers in the AEC, HIC and Australian Bureau of Statistics (ABS).

Audit conclusion

13. The ANAO concluded that, overall, the Australian electoral roll is one of high integrity, and that it can be relied on for electoral purposes.

14. We concluded that the AEC is managing the electoral roll effectively. AEC policies and procedures can provide an electoral roll that is accurate, complete, valid and secure. In particular, the AEC has mechanisms in place to provide assurance that the names and addresses on the electoral roll are legitimate and valid; and that people who are eligible to vote are registered properly.

15. At the same time there are areas of AEC management of the roll that can be improved; in particular by better targeting and expansion of the data sources currently used to update the roll, by strengthening strategic relationships with key stakeholders, and by better identification and management of risks to the integrity of the roll.

Accuracy

16. The audit found that, while the AEC does not set a target for accuracy of the roll, its CRU program is primarily focused on ensuring the accuracy of existing enrolments. Data-matching by the ANAO of the names and dates of birth of individuals on the roll indicated that over 96 per cent were accurate.

Completeness

17. Australia has a system of compulsory enrolment and compulsory voting. By law all eligible individuals must enrol to vote. The audit found that the AEC maintains a balance between encouraging enrolment in line with the

requirements of legislation and with not overly intruding in the lives of citizens. As a result, it is unlikely, nor indeed feasible, that the roll will achieve 100 per cent completeness.

18. For some years, the AEC has set a target of 95 per cent completeness for the roll. ANAO analysis indicated that, at the close of roll for the 2001 federal election, the roll was likely to be 95 per cent complete.

Validity

19. The AEC does not set performance targets for validity of enrolments although its procedures are explicitly designed to ensure that all enrolments are valid.

20. ANAO independent data-matching of the electoral roll indicated that, of the enrolments matched to Medicare data, over 99 per cent appeared to be valid.

Security

21. The audit found that internal AEC procedures to ensure roll security and to prevent tampering with roll data were robust and effective. The audit identified security gaps and risks of unauthorised use of roll data in the scope and regulation of external access to the roll.

Key findings

Managing the electoral roll

22. In 1999, the AEC adopted a new methodology for updating the roll, moving from habitation reviews, or doorknocking, to computer-based CRU. The ANAO considers that the CRU methodology is an effective means of managing the electoral roll and is capable of providing a roll that is highly accurate, complete and valid. Whilst noting the potential benefits of CRU, the ANAO found that, to date, the process has developed in an ad hoc manner, without the benefits of strategic planning by the AEC to achieve a consistent national approach and to maximise its effectiveness.

23. Under habitation reviews, national standards and procedures were common across all States and Territories. After two years, CRU has not been fully implemented and the data used for CRU is not consistent across States and Territories. Uneven trends are beginning to appear in relation to the accuracy and completeness of the Commonwealth rolls in different States and Territories. There is a need for the AEC to further develop national standards for data used to update the roll, to identify gaps in CRU coverage, and to determine which data are required to address those gaps.

24. The ANAO considers that there has been only limited strategic direction and planning to reposition the AEC since its move from habitation reviews to CRU. Cooperation and communication between key stakeholders, in particular State and Territory electoral authorities, can be improved; monitoring and reporting on the outcomes of CRU have been incomplete; and risks to the integrity of the roll under CRU need to be better identified and managed.

Managing strategic relationships

25. The audit examined strategic relationships between the AEC and stakeholders including States and Territories, local government, and the JSCEM. The AEC has worked to establish strategic relationships with a number of key stakeholders. While the ANAO acknowledges that the success or otherwise of these is an ongoing two-way process, overall we identified a need for the AEC to strengthen strategic relationships with key stakeholders whose cooperation and commitment are essential for the effective management of the electoral roll.

26. The ANAO considers that the AEC should identify more effective arrangements to progress negotiations with States/Territories for access to relevant data sets, and actively pursue access to all data sets that it considers necessary to ensure efficient and effective management of the Commonwealth roll.

27. The AEC could usefully enter into appropriate administrative agreements with State and Territory electoral authorities to identify common objectives and opportunities to work together more effectively; it could improve national coordination of operational relationships with States, Territories and local government; and it could also better plan and structure its internal management of key stakeholder relationships.

Confirming the accuracy of the roll

28. Unlike most lists of clients maintained by government agencies and private sector organisations, the electoral roll is a public document open for public inspection. Electors can readily check enrolment details and advise the AEC of errors. The public nature of the electoral roll acts as a catalyst to promote a degree of accuracy that is often missing in non-public information sources.

29. The AEC also places a heavy emphasis on maintaining accurate and up-to-date enrolment records of existing electors, with its CRU activities primarily focussed on actively identifying incorrect enrolment information and instigating necessary follow-up action.

30. The AEC does not set targets for, nor measure or report on, the accuracy of the electoral roll. The electoral roll changes continuously. At any one time it will contain inaccurate records, where voters have recently changed address, gone overseas or died, and the AEC has not yet been advised of the change, nor identified it through the CRU.

31. Despite these circumstances, the audit found a high degree of accuracy in electoral roll data. ANAO data-matching of name and date of birth against Medicare and other sources achieved a significant match of over 96 per cent.

32. To ensure that voters are registered in their correct electoral Division, the AEC maintains an up-to-date address register. ANAO data-matching with Medicare only confirmed the accuracy of the names and date of birth of those on the roll. The more uneven time frames of client transactions with Medicare meant that matching roll addresses and Medicare addresses would be of little value. Consequently this review was not attempted. The ANAO noted that, where the AEC routinely matches its address register with Australia Post, Centrelink and State data, the register proves to be consistently accurate and reliable.

33. The audit found that the AEC has in place procedures and controls that provide assurance on the accuracy of the roll, but that current performance information can provide only incomplete confirmation of accuracy. The audit identified a need for the AEC to develop and report appropriate performance indicators against quantified targets.

Improving the completeness of the roll

34. In its outcome/output framework, the AEC sets a performance target of 95 per cent of the people eligible to vote being included on the electoral roll. Measuring the completeness of the electoral roll poses particular difficulties for the AEC, as it has never had access to a complete list of all individuals entitled to vote, against which to compare the roll.

35. As a surrogate measure, for several years the AEC has engaged a market research firm to undertake periodic telephone surveys to determine enrolment levels. Results from these surveys have consistently reported enrolment levels around the 95 per cent target set by the AEC. The ANAO identified some gaps in the survey approach. In particular, certain groups not well represented on the roll are not surveyed. Their exclusion would tend to bias the survey result and to overstate the completeness of the roll.

36. The ANAO considers that there is scope for the AEC to improve further the completeness of the roll; to identify the areas of significant levels of non-enrolment; and to develop more effective national strategies to encourage enrolments in under-represented groups.

37. ANAO analysis of ABS population data and Medicare records indicate that, at close of roll for the November 2001 federal election, the roll was likely to be 95 per cent complete.

Improving the validity of the roll

38. For an enrolment to be valid, the individual submitting the enrolment form must meet specific qualifications: that is, he or she must have attained at least 17 years of age; be an Australian citizen or an eligible British subject; and have lived in his or her Division for at least one month.

39. The audit reviewed AEC procedures put in place to ensure the validity of enrolments, and considers that those procedures are generally effective and can provide assurance on the validity of the roll.

40. The ANAO reviewed the AEC fraud control plan for 2000–2002 as it applies to the electoral roll and found that it provides a reasonable assessment of the risks, that the AEC has assessed the risks of enrolment fraud occurring; and that it has taken appropriate action to address those risks.

41. However, given the sensitivities of the Parliament and public to allegations of enrolment fraud, the ANAO considers that the AEC should give priority to finalising and implementing a fraud control plan specific to enrolment activities.

42. ANAO data-matching of the roll against Medicare data provided some indicative material on validity. Ninety-five point six per cent of the roll was

matched to Medicare records, of these over 99 per cent could be confirmed to the Medicare *Australian resident* code, or to other validating evidence, indicating that less than one per cent of matched records would require further investigation for validation.

AEC security of roll data

43. To fulfil its functions, the AEC collects information from electors and other sources. There is an expectation by the public that, having met their obligations under the law to provide information to the AEC, the AEC in turn will implement adequate security measures to protect that information from unauthorised disclosure.

44. In compliance with Commonwealth requirements, the AEC has developed a risk management plan to identify and address the risks associated with its functions. The ANAO found that, as part of its risk management plan, the AEC had assessed the risks to internal security of the electoral roll and taken appropriate action to address those risks. The AEC has also implemented internal security provisions to prevent unauthorised access to the roll.

Management information systems

45. The AEC management information system does not provide adequate information on AEC management of the electoral roll. The ANAO considers that information could readily be prepared from AEC data on the accuracy, completeness and validity of the electoral roll, the accuracy of the address register, and the unit cost of the various enrolment activities undertaken by the AEC. Currently these factors are neither analysed nor included in AEC management information.

46. Shortcomings in its management information systems limit AEC's ability to analyse the performance of the organisation; to monitor the implementation and impact of initiatives, such as CRU; and to identify better practice to assist it in ensuring cost effective service delivery. Shortcomings may also limit AEC's ability to provide its major stakeholders with timely and appropriate information on management of the roll.

Reporting performance

47. The AEC does not have a systematic performance measurement framework in place to regularly report to:

- the AEC executive, on performance of electoral roll management;
- AEC staff, on their work performance;

- State HOs and Divisional Offices, on key information relating to their roll responsibilities;
- joint roll partners, on AEC's performance in maintaining joint rolls; and
- Parliament, on AEC's management of the electoral roll.

48. The AEC should develop a suite of performance measures and benchmarks to regularly report to AEC management on the integrity of the electoral roll. In particular, State HOs and Divisional Offices could benefit from comparative information on State and Divisional performance to encourage internal benchmarking and to stimulate and assist performance improvement.

Reporting disclosure of electoral data to external users

49. Enrolment requires citizens to provide personal information to the AEC for inclusion on the electoral roll, which is then available for public inspection.

50. The AEC is authorised to provide electoral information to a range of external users. Most electors would be unaware of the extent to which personal information provided in order to enrol, and data extrapolated from AEC systems, is available for secondary purposes. Consequently, the AEC should ensure that it has mechanisms in place to manage this disclosure in a way that provides transparency and accountability.

51. The *Privacy Act 1988* recognises the right of individuals to know when and why information concerning them is used, and to whom it is disclosed. Currently the AEC provides limited public information on disclosure on its enrolment forms. While this enables a degree of informed consent for those newly enrolling, it does not make the information available to those citizens already on the roll.

52. The AEC could include more complete information on its provision of enrolment data for secondary purposes on enrolment forms, in its Annual Report or on the AEC website.

Improving internal communication

53. Communications across the AEC could be improved, particularly in regard to sharing knowledge and good practice in implementing CRU. There are opportunities for better communication and liaison across State borders, particularly amongst Divisions facing similar challenges.

54. Regular contact could be established amongst cross-border staff from Divisions with similar characteristics. This could act as a useful framework for interchange of strategies and for promoting the dissemination of better practice

across the AEC. One option to facilitate such an exchange of information could be for the AEC to develop a 'lessons learned' database as part of its intranet network.

Constraints imposed by legislation

55. During the audit, the ANAO noted areas where current legislative requirements constrain the AEC's capacity to administer the electoral roll effectively; limit its ability to ensure the accuracy, completeness, validity and security of the roll; and increase the risk of error or inefficiency.

56. While the form of the legislation is a matter for the Government and Parliament, the AEC should consider providing advice to the responsible Minister on legislative options to enhance the efficiency of the Commission and the integrity of the electoral roll.

57. In this context, the key areas arising from this audit that the ANAO considers warrant review are set out below.

58. Issues relating to improving accuracy, completeness and validity of the roll are as follows:

- The audit identified benefits in the AEC having periodic access to Medicare data to assist in maintaining the accuracy, completeness and validity of the roll. There could also be benefits to the HIC having access to the electoral roll to ensure accuracy and validity of its data.
- The AEC has demand powers to require provision of information on electors but no penalties or sanctions that can be invoked when such information is refused.
- There could be merit in reviewing requirements for silent elector status. Broadening the criteria for silent elector status could provide a means for citizens to protect their privacy other than by refusal to enrol.
- It could be more effective to implement an infringement penalty system for individuals who persistently refuse to enrol.

59. Issues relating to improving security of the roll are as follows:

- Current levels of external access to unique identifiers on the roll, such as date of birth, could increase the difficulty of the AEC in detecting fraudulent enrolment.
- Unlike the data provided to Commonwealth agencies, that provided to Members, Senators and political parties does not have reciprocal accountability requirements nor specific restrictions on end-use.

- Organisations and individuals can purchase printed copies of the public roll with no restrictions on their end-use. There is an increasing risk that commercial use of roll information could bring the electoral administration into disrepute and deter citizens from enrolling in order to protect their privacy.
60. Issues relating to efficiency are as follows:
- The *CE Act* specifies a significant proportion of AEC staff positions. These staffing prescriptions result in a range of difficulties in managing the AEC.
 - There could be advantages in automatic updating of the roll using third party data from sources where the individual's identity had been verified.
 - There would be efficiencies in simplifying the objection process required to remove electors from the roll.

Recommendations

Set out below are the ANAO's recommendations aimed at improving the AEC's management of the electoral roll. Report paragraph references and abbreviated AEC comments are also included. The ANAO considers that the AEC should give priority to recommendations 1, 3, 11 and 12.

**Recommendation
No. 1
Para 2.23**

To achieve a consistent approach across all States and Territories in managing the electoral roll, the ANAO recommends that the AEC develop a strategic plan for the CRU that:

- sets out national standards for updating the electoral roll;
- identifies and addresses gaps in the existing CRU program; and
- sets a timetable for implementation of a consistent national CRU program.

AEC Response: Agreed.

**Recommendation
No. 2
Para 2.42**

To maximise the benefits of its data-matching activities in maintaining the electoral roll, the ANAO recommends that the AEC:

- determine an optimal suite of data required to implement an effective national CRU program;
- monitor data sources used for CRU to ensure the most effective sources are identified and used; and
- monitor enrolments obtained from non-CRU activities to identify potential gaps in data-matching coverage.

AEC Response: Agreed.

**Recommendation
No. 3
Para 2.47**

To improve the effectiveness of the CRU program, the ANAO recommends that the AEC:

- identify more effective arrangements to progress negotiations with States and Territories for access to relevant data; and
- actively pursue access to all data sets that it considers essential to ensure efficient and effective management of the Commonwealth roll.

AEC Response: Agreed.

**Recommendation
No. 4
Para 2.66**

To improve the effectiveness of its correspondence with electors, the ANAO recommends that the AEC:

- review and revise, as appropriate, CRU correspondence to electors; and
- include in future correspondence reference to a citizen's legal obligation to enrol to vote and the penalties that apply for non-compliance.

AEC Response: Agreed.

**Recommendation
No. 5
Para 2.96**

To enhance AEC ability to use its existing information on the electoral roll better and manage the roll more efficiently and effectively, the ANAO recommends that the AEC upgrade its management information systems to enable:

- measuring and reporting of:
 - the accuracy, completeness and validity of the electoral roll;
 - the accuracy of the address register; and
 - the cost of its various enrolment activities; and
- monitoring of the implementation and impact of initiatives, such as CRU.

AEC Response: Agreed.

**Recommendation
No. 6
Para 2.108**

To improve accountability, and to provide greater assurance that the electoral roll is being managed effectively, the ANAO recommends that the AEC identify and implement a suite of performance indicators that:

- are relevant and appropriate for measuring enrolment activities;
- contain both qualitative and quantitative measures; and
- address the needs of the different stakeholders of the AEC.

AEC Response: Agreed.

**Recommendation
No. 7
Para 3.46**

To improve and strengthen its relationships with key stakeholders, the ANAO recommends that the AEC give priority to consultation with, and obtaining feedback from, key stakeholders; and that it develop appropriate strategies and procedures for conducting, managing and reporting on these relationships through its corporate planning and performance reporting frameworks.

AEC Response: Agreed.

**Recommendation
No. 8
Para 4.31**

To assist in its management of the accuracy of electoral roll, the ANAO recommends that the AEC:

- develop and introduce performance indicators to measure accuracy of the electoral roll;
- develop measurable targets for roll accuracy; and
- report those targets and indicators in its Annual Report.

AEC Response: Agreed.

**Recommendation
No. 9
Para 4.36**

To measure the accuracy of the electoral roll, the ANAO recommends that the AEC consider introducing a periodic review of a sample of the electoral roll.

AEC Response: Agreed.

**Recommendation
No. 10
Para 4.64**

To improve the reliability and completeness of the electoral roll, the ANAO recommends that, in 2002–2003, the AEC focus its enrolment efforts on improving the completeness aspect of the electoral roll by:

- identifying groups where non-enrolment is most prevalent; and
- developing effective strategies to improve enrolment by these groups.

AEC Response: Agreed.

**Recommendation
No. 11
Para 4.106**

To minimise the risk of enrolment fraud, the ANAO recommends that the AEC give high priority to finalising and implementing its fraud control plan specific to enrolment activities.

AEC Response: Agreed.

**Recommendation
No. 12
Para 5.53**

To assess and to minimise risks to the integrity of the roll arising from new technology and increased access to roll data, the ANAO recommends that the AEC give priority to completion of its review of ss.89 to 92 of the *Commonwealth Electoral Act 1918*, recommended by the JSCEM, taking into account the extent of current electronic access to electoral roll data, and effectively assessing and treating the risks inherent in current developments in computer technology.

AEC Response: Agreed.

Audit Findings and Conclusions

1. Background and Context

This chapter includes background on the Australian Electoral Commission and the electoral roll. It outlines the Commission's functions, organisation and resourcing; and its major stakeholders, including the Joint Select Committee on Electoral Matters and State and Territory electoral authorities. The chapter sets the context for the audit, and outlines its objectives, scope and methodology.

Introduction

The Australian Electoral Commission

1.1 The Australian Electoral Commission (AEC) is an independent statutory authority established in February 1984 under the *Commonwealth Electoral Act 1918 (CE Act)*. AEC responsibilities include:

- managing federal parliamentary elections;
- maintaining the Commonwealth electoral roll; and
- providing registration, funding and disclosure services to parties and candidates.

1.2 The AEC maintains most State and Territory electoral rolls under arrangements contained in Joint Roll Arrangements with States and Territories. It can also provide assistance and manage elections for other organisations on a fee for service basis.¹

Accountability and administrative arrangements

1.3 The AEC is a statutory authority within the Finance and Administration portfolio. Its responsible Minister is the Special Minister of State. It is included in the *Financial Management and Accountability Act 1997*, with the Electoral Commissioner responsible for effective, efficient and ethical management and promotion of the AEC's affairs.

1.4 Compared to many other Commonwealth commissions, the *CE Act* provides the AEC with a high degree of independence of ministerial direction in its functions. This status recognises that the AEC plays a critical role in managing Commonwealth electoral matters independent of political pressure, and must be assured of an appropriate degree of independence from the government of the day.

¹ In addition to the functions allowed by the *CE Act*, other Commonwealth legislation specifies additional functions for the AEC including management of referendums, managing elections for the Aboriginal and Torres Strait Islander Commission and Torres Strait Regional Authority and providing electoral services for unions and industrial organisations.

Organisational structure

1.5 The Electoral Commissioner is the chief executive officer of the AEC. The Deputy Electoral Commissioner and two First Assistant Commissioners, based in the AEC Central Office (CO) in Canberra, assist the Commissioner to undertake his or her functions.

1.6 Australian Electoral Officers (AEOs) are the principal electoral officers in each State and the Northern Territory.² They are appointed by the Governor-General for a term not exceeding seven years. They are subject to direction from, and, except where their statutory position otherwise requires, report directly to, the Electoral Commissioner.

1.7 States and Territories are divided into electoral Divisions, with one Member of the House of Representatives chosen for each Division. A Divisional Returning Officer (DRO) is appointed for each Division, responsible for Commonwealth electoral administration in that Division. DROs are appointed at the Australian Public Service (APS) 6 level.

1.8 Unique in Commonwealth legislation, the *CE Act* specifies a significant proportion of AEC staff positions. In 2000–01, the AEC had 826 equivalent full time staff; of these, 159 positions were specifically created by the Act.³ By prescribing the number and location of AEC staff in detail, the *CE Act* has a significant influence on the structure of the organisation.

Resourcing

1.9 The AEC is funded by annual appropriations with additional revenue from special appropriations, and cost recovery from the provision of electoral services to other organisations. In 2000–01, the AEC received \$109.0 million in revenue comprising revenue from government of \$96.1 million, revenue from sale of goods and services of \$10.0 million, and \$2.9 million in revenue from other sources.⁴

1.10 In 2000–01, the AEC spent \$48.6 million, or 45 per cent of its total resources, on activities related to management of the electoral roll. Of this, the Government provided \$8.8 million in special appropriations for electoral roll review activities. As well, the AEC received \$4.8 million in contributions from States and Territories towards the cost of maintaining electoral rolls under the Joint Roll Arrangements.⁵

² S.30 of the *CE Act* specifies that an Australian Electoral Officer is appointed for the ACT during the time of a federal election. At all other times the Electoral Commissioner acts as the principal electoral officer for the ACT.

³ AEC positions created under the *CE Act* are the Electoral Commissioner, the Deputy Electoral Commissioner, seven AEOs and 150 DROs.

⁴ AEC Annual Report 2000–2001, p.112.

⁵ *ibid.*, p.16.

AEC Outcomes and Outputs

1.11 The AEC identifies its mission as:

to provide the Australian people with an independent electoral service capable of meeting their needs, while enhancing their understanding of and participation in the electoral process.

1.12 The AEC has three identified outcomes:

- electoral roll management;
- elections, ballots and referendums; and
- electoral education.

Outcome 1: Electoral Roll Management

1.13 The AEC aims to have ‘an electoral roll which ensures Australians their voter entitlements and provides the basis for planning of electoral events, and electoral redistributions’.⁷ Under Outcome 1, the AEC produces the following four outputs:

- **The electoral roll.** To meet this output, the AEC undertakes a range of activities including processing of enrolment and address data, identifying and meeting requirements of internal and external users of roll-based products, and developing and implementing roll management strategies. The AEC negotiates Joint Roll Arrangements with States and Territories and produces information required for Divisions.
- **Electoral roll updates.** The *CE Act* requires the AEC to undertake regular reviews of the electoral roll and to keep the roll up-to-date. The AEC undertakes various strategies to capture citizens’ enrolment details and to update the electoral roll.
- **Roll products and services.** The AEC provides roll products and services for joint roll partners, federal Members and Senators, medical researchers and the public. Services include production of electoral rolls for State, local and federal by-elections.
- **Support services for electoral redistributions.** To ensure equal representation among electoral Divisions, the boundaries are redrawn (redistributed) periodically. The AEC provides support services for the responsible Redistribution Committees. In 2000–01, two redistributions were completed.

⁶ *ibid.*, p.7.

⁷ *ibid.*, p.17.

1.14 In undertaking its functions, the AEC holds that its approach is world's best practice. The AEC cites its continued involvement in assisting and advising emerging nations on electoral matters, and the ongoing demand for its services internationally, particularly by the United Nations, as indicators of its commitment to providing quality products and services.

The electoral roll

1.15 The Commonwealth electoral roll lists the names and addresses of people entitled to vote in federal elections. At close of rolls for the federal election on 10 November 2001, there were over 12.6 million people on the electoral roll.

1.16 The integrity of the electoral roll is essential for the conduct of free and fair elections. By providing a reliable list of qualified electors the electoral roll assists in ensuring that those who are entitled to vote can do so and that electors cast their vote in the correct electoral Division. The electoral roll is a key, legislatively created instrument for ensuring that Australia's democratic form of government functions effectively. It stands above political processes.

1.17 An electoral roll with high integrity also ensures that the AEC can manage elections effectively and serves to maintain the confidence of citizens in Australia's electoral system.

Eligibility for enrolment and voting

1.18 To be eligible to enrol, an individual must:

- have attained at least 17 years of age;
- be an Australian citizen or an eligible British subject; and
- have lived in the relevant Division for at least one month.

1.19 There are relatively few restrictions to enrolment. Disqualification only occurs where a person is:

- of unsound mind; being incapable of understanding the nature and significance of enrolment and voting; or
- serving a sentence of five years or more for an offence against a Commonwealth, State or Territory law; or
- convicted of treason or treachery, not having been pardoned.

Changes to the electoral roll

1.20 The electoral roll changes continuously. At any one time it will hold inaccurate records, where voters have recently changed address, gone overseas

or died, and the AEC has not yet been advised of the change, nor identified it through CRU. The AEC is responsible for making additions, changes to existing details, and deletions from the roll.

1.21 Most additions and alterations to the roll are initiated by the AEC receiving signed and witnessed enrolment forms from electors. The *CE Act* requires electors to provide enrolment information in writing. Enrolment forms must be signed or marked by the elector and witnessed by a person entitled to be on the roll.⁸

1.22 The majority of additions to the electoral roll comprise the enrolment of youth coming of age and the enrolment of new citizens. The largest number of transactions affecting the roll are alterations where existing electors have changed their address. Electors are required to inform the AEC of changes to their address once they have met the qualification of one month's residence at a new address.

1.23 The AEC updates the roll using a computer-based methodology known as Continuous Roll Update (CRU). Data on the roll is continually reviewed and matched with other Commonwealth and State data sources to identify specific addresses from which, or into which, people are moving. The AEC then contacts the residents at these addresses and asks them to update their enrolments.

Joint Roll Arrangements with States and Territories

1.24 State, Territory and local government elections are called and managed under relevant State and Territory legislation. Although there are some differences, State and Territory qualifications for enrolment are generally similar to those for Commonwealth enrolment.

1.25 All States and Territories have a Joint Roll Arrangement with the AEC. Under these arrangements, each State and Territory shares a joint enrolment form with the Commonwealth. Consequently, citizens need to complete only one form to enrol for federal, State and Territory, and local government purposes. The Joint Roll Arrangements provide a framework for the AEC to work cooperatively with its State and Territory counterparts.

1.26 Joint Roll Arrangements outline the services the AEC will provide, and specify the amount per elector that each State or Territory pays to the AEC for these services. Under the Arrangements, State and Territory electoral authorities pay part of the cost of maintaining the roll in the relevant State or Territory.

1.27 Most State and Territory electoral rolls are maintained with the Commonwealth roll on the AEC's computerised Roll Management System

⁸ The witness does not have to actually be on the roll, only entitled to be on the roll.

(RMANS). The AEC processes elector information from enrolment forms and enters it on to RMANS. This data is then made available to other electoral authorities to produce rolls for State and local government elections and by-elections as required.

1.28 Two States, Victoria and Western Australia, maintain separate State electoral rolls independent from the Commonwealth roll. In these States, the AEC is responsible for the day-to-day collection and processing of enrolment forms, and then provides the data to the State electoral authority to allow it to update the State roll. Victoria has decided that from July 2002 it will manage a separate State-based electoral roll system with a separate enrolment process and its own data management.

1.29 As the AEC has increased its use of technology to update the roll, State data sources have proved very effective for locating electors who have changed address. However, AEC access to State data sources to improve the effectiveness of CRU activities has varied from State to State. The most notable example is New South Wales, from which the AEC currently receives only data on deaths, from the NSW Registrar, but no other State agency data are received.

Electoral Council of Australia

1.30 The Electoral Council of Australia is a consultative council of Electoral Commissioners and Chief Electoral Officers of the Commonwealth, States and Territories. The Electoral Council of Australia considers matters to facilitate or improve Australian electoral administration and provides a forum for consultation on electoral matters in Australia.

1.31 The Electoral Council of Australia has been active in examining and promoting efficient and effective roll management methodologies, in particular CRU.

The CRU Steering Committee (CISCO)

1.32 The Electoral Council of Australia has one standing subcommittee, CISCO, a cooperative forum for the development of CRU. CISCO was formed to facilitate the implementation of CRU nationally. CISCO has continued as a monitoring and policy-making subcommittee of the Electoral Council of Australia and provides a communication channel for Commonwealth, States and Territories electoral authorities to share information and experience on CRU.

Previous reviews

Joint Standing Committee on Electoral Matters

1.33 The Joint Standing Committee on Electoral Matters (JSCEM) inquires and reports on matters relating to electoral laws and practices and their administration referred to it by either House of the Parliament or a Minister. After each federal election, the Committee inquires and reports to Parliament on the conduct of the election and recommends ways in which the process could be improved.

1.34 The JSCEM's most recently completed inquiry resulted from a request on 23 August 2000, by the Special Minister of State, to examine the issue of the integrity of the electoral roll and fraudulent enrolment. The JSCEM agreed to inquire into and report on:

- the adequacy of the Commonwealth Electoral Act for the prevention and detection of fraudulent enrolment;
- incidents of fraudulent enrolment; and
- the need for legislative reform.

1.35 In June 2001, the JSCEM tabled its report *User Friendly Not Abuser Friendly: Report of the Inquiry into the Integrity of the Electoral Roll*. The report found that existing controls to prevent enrolment fraud could be strengthened and that the AEC could develop a more comprehensive approach to preventing enrolment fraud. The JSCEM noted that penalties for electoral fraud were relatively low compared to those for some offences in other Commonwealth legislation and that this affected the ability of the AEC to have suspected cases of enrolment fraud investigated by the Australian Federal Police.

1.36 The report made 18 recommendations covering management of the electoral roll and enrolment fraud, and registration of political parties. A minority report was included that criticised the conduct of the inquiry. The Government responded to the report on 4 October 2001, supporting 12 of the recommendations.

Shepherdson Inquiry

1.37 In 2000–2001 the Queensland Criminal Justice Commission initiated an inquiry into alleged misconduct affecting the electoral roll. Known as the Shepherdson Inquiry, it examined several Australian Labor Party (ALP) plebiscites conducted between 1988 and 1996, and a by-election in the State seat of Mundingburra in 1996.

1.38 The report of the Shepherdson Inquiry, *An Investigation into Electoral Fraud*, April 2001, established that some ALP members had made false enrolments to bolster the chances of specific candidates in preselections. There was no evidence to indicate that this tactic had been used to influence the outcome of public elections. Where false enrolments were found to have been used in public elections, the instances examined appeared to be opportunistic rather than systematic or widespread.

Allegations of electoral fraud and the ANAO audit

1.39 Both the JSCEM report and Shepherdson Inquiry examined allegations of fraud in ALP plebiscites in Queensland. Plebiscites are designed to choose ALP candidates for federal elections. They do not affect the outcome of Commonwealth elections.

1.40 The ANAO considers that the type of fraud uncovered in Queensland is unlikely to affect the outcome of a federal election. Such fraud would need to be much more systematic, conducted on a much wider scale, and remain undetected in order to influence the result of an election in a federal Division. The findings of the JSCEM report and the Shepherdson Inquiry did not include any evidence to give credence to electoral fraud of this scale.

1.41 While the scope of the ANAO audit included the validity of enrolments and the security of the electoral roll, it did not include investigation of specific allegations of electoral fraud. The audit, however, did review AEC's procedures to assess the risk of enrolment fraud and the appropriateness of actions taken to address those risks.

ANAO performance audit of the integrity of the electoral roll

Audit objectives and scope

1.42 The objectives of the audit were twofold. The first objective was to provide an opinion on integrity of the electoral roll.

1.43 In addressing this objective, the ANAO defined integrity of the electoral roll as having four elements:

- accuracy—the electoral roll contains correct and up-to-date information relating to individuals;
- completeness—the electoral roll includes all individuals who are eligible to enrol;

- validity—the electoral roll includes no-one ineligible to enrol; and
- security—the electoral roll is protected from unauthorised access and tampering.

1.44 The second objective was to examine the effectiveness of AEC management of the electoral roll in ensuring the roll’s accuracy, completeness, validity and security. In particular, the audit identified and assessed the mechanisms the AEC has in place to provide assurance that:

- the names and addresses on the electoral roll are legitimate and valid; and
- people who are eligible to vote are registered, and registered correctly.

1.45 The scope of the audit included a review of AEC policies and procedures for managing the electoral roll and their implementation by AEC State and Divisional Offices. In reviewing AEC management of the roll, particular attention was paid to:

- strategic relationships between the AEC and its major stakeholders, where these could affect the outcomes achieved for the electoral roll;
- the CRU process—the AEC’s current approach to ensuring the accuracy, completeness and validity of the roll; and
- the adequacy of security and access arrangements to protect electoral roll information from tampering and unauthorised use.

Audit methodology

1.46 The audit commenced in May 2001, with fieldwork conducted between May 2001 and February 2002. In addition to file and document reviews, the ANAO conducted interviews with staff in the AEC CO in Canberra, State Head Offices in all State and Territory capitals, Divisional Offices in New South Wales, Queensland, Victoria, Western Australia and the Australian Capital Territory. The audit team also spoke to State electoral authorities in all States and Territories, the secretariat of the JSCEM and the secretariat of the Electoral Council of Australia.

1.47 The audit reviewed AEC roll management procedures and their effectiveness in ensuring that the Commonwealth roll is accurate, complete, valid and secure. Chapter 2 sets out AEC procedures for administering the roll and reviews their effectiveness. It looks in some detail at CRU, the computer-based methodology adopted by the AEC in 1999 for updating the roll. Chapter 3 reviews AEC management of its strategic relationships. Chapter 4 sets out the results of the audit review of AEC administrative procedures and of the ANAO’s independent testing of the roll.

1.48 ANAO independent testing of the roll involved matching roll data with Medicare enrolment data from the Health Insurance Commission (HIC) and other sources. Data-matching was also recommended by the JSCEM.

1.49 The audit reviewed AEC procedures for maintaining the security of the roll, including those for managing access to electoral roll data for secondary uses. The review is discussed in Chapter 5. The audit noted areas where current legislative requirements constrain the AEC's capacity to administer the roll effectively. These are discussed through the report and summarised at the end of Chapter 5.

1.50 ANAO contracted the Australian Bureau of Statistics (ABS) to provide statistical advice and to evaluate the AEC methodology for measuring completeness of the roll.

1.51 The audit was conducted in conformance with ANAO auditing standards and cost \$437 000.

Acknowledgments

1.52 The ANAO wishes to express its appreciation for the time, effort and expertise contributed by officers representing the AEC, during the audit and in the preparation of the report. The ANAO also thanks officers of State and Territory electoral authorities and other stakeholder organisations who were consulted during the audit. We also acknowledge the assistance and expertise of the HIC, in supplying data for information matching.

2. Administration of the Roll

This chapter reviews key elements of AEC administration of the electoral roll including procedures to keep the roll up-to-date; legislative requirements reflected in AEC policies and procedures; and the extent to which policies and procedures are implemented. The AEC organisational structure, the adequacy of its management information systems and performance measurement, as these relate to and affect the roll, are also discussed.

Introduction

2.1 The major challenge the AEC faces in managing the electoral roll is that the roll is constantly changing. As individuals become eligible to vote through coming of age or by naturalisation, others lose their entitlement through death, imprisonment or by leaving Australia permanently. As the Australian population has become increasingly mobile, the most significant number of changes result from individuals changing their address.

2.2 The *CE Act* places the onus on electors to advise the AEC of changes to their enrolment details within seven weeks⁹ of such changes occurring. Perhaps because an incorrect electoral record has no immediate consequences for the elector, it is not a high priority when people move house. Many electors only advise the AEC of a change in their details when an election is announced. The penalty for not updating enrolment details is currently \$50.00.

A balanced approach

2.3 Australia has a system of compulsory enrolment and compulsory voting. The audit noted that the AEC maintains a balance between encouraging enrolment in line with the requirements of legislation and not overly interfering in the lives of individuals. Under CRU, the AEC actively identifies groups such as school leavers and new citizens and invites them to enrol. It also encourages enrolment through education programs and disseminating information. The AEC is likely to prosecute only the most blatant cases of refusal to enrol. The ANAO noted that as a result, it is unlikely that the enrolment of all eligible individuals will be achieved.

AEC procedures to maintain the electoral roll

2.4 The majority of electors do not inform the AEC in a timely manner of changes in their electoral details. Of 2.3 million enrolments processed during

⁹ Electors must be resident at their address for one month before they qualify for enrolment. After that they then have three weeks to advise the AEC of their new address.

2000–01, only around 40 per cent resulted from the elector in the first instance advising the AEC.

2.5 To overcome the lack of prompt advice from many electors, the AEC undertakes a range of activities to obtain accurate enrolment information and update the roll.

2.6 The *CE Act* requires the AEC to undertake periodic reviews of the electoral roll. Until recently the AEC relied on habitation reviews to update enrolment details and maintain an accurate and complete roll. Habitation reviews involved AEC field officers visiting (doorknocking) each household in a given area and confirming the eligible enrolments at that address. Residents incorrectly enrolled, or not enrolled at that address, could update their details during the interview.

2.7 By the mid-1990s problems with habitation reviews prompted the Australian Joint Roll Council (now the Electoral Council of Australia) to explore other ways of maintaining an up-to-date roll. While the main objective of the habitation review for the AEC was to have an accurate roll for federal events, several State and local government electoral events also occurred each year. Although habitation reviews in different States were set in an attempt to fit the timing of both federal and State electoral events, State and local government rolls were often not updated in time for these elections.

2.8 Other disadvantages of habitation reviews identified by the Joint Roll Council included:

- they did not capture changes that occurred between a habitation review and an election;
- the electoral roll quickly became out-of-date as habitation reviews were undertaken generally only every two years;
- they confirmed that around 60 per cent of enrolments had not changed since the last review;
- generally claims made verbally to fieldworkers were not verified, for example a claim that a resident was a non-citizen and thus not required to be enrolled;
- a large amount of time was required to complete a review of all addresses in every Division;
- they involved increasing costs without commensurate increases in enrolment transactions; and
- logistical difficulties in undertaking habitation reviews increased in recent times, including a lack of qualified persons to undertake reviews; houses empty as all members of the household were at work; increasing numbers

of secure inaccessible buildings; and a number of occupational health and safety issues were identified.

Continuous Roll Update

2.9 The Joint Roll Council concluded that the best option for future roll management was to make greater use of available technology by moving to CRU. This methodology was used overseas, most notably in Canada, to update its electoral rolls.

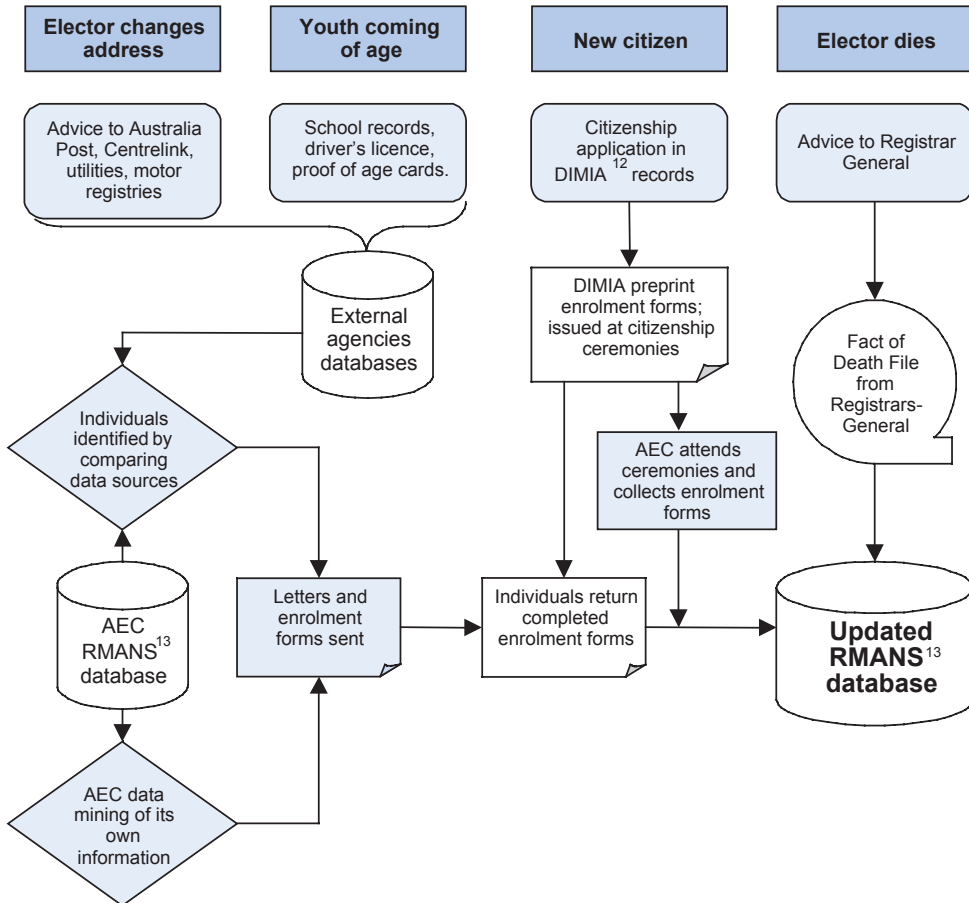
2.10 CRU aims to address the deficiencies of habitation reviews by concentrating effort on identifying the 35 per cent of the population whose enrolment details do change regularly.¹⁰ Simply put, with CRU the AEC, using data sourced from within the AEC and obtained from external sources, undertakes data-matching and data mining¹¹ activities to identify addresses on the roll where residents have moved. The AEC identifies new electors (youth coming of age and new citizens), and those to be removed from the roll (for example, deceased electors), by the same process.

2.11 Using the results from data-matching and data mining, the AEC sends letters and enrolment forms to individuals inviting them to enrol or update their details. As individuals respond to AEC letters the roll is updated. A simplified diagram of the CRU process is shown at Figure 1.

¹⁰ The remaining 65 per cent comprises the estimated proportion of electors whose enrolment details do not change regularly (60 per cent) and the proportion of the population that is not enrolled (5 per cent). The AEC estimates that 95 per cent of eligible individuals are enrolled to vote.

¹¹ Data-matching involves matching AEC records to the data records obtained from external sources. Data mining entails the analysis of data the AEC already possesses.

Figure 1
The Continuous Roll Update process



Source: ANAO, prepared from AEC information.

2.12 CRU primarily relies on making contact with individuals by mail but it also entails other activities such as targeted doorknocking¹⁴ and telephone contact.

2.13 With CRU, updating of the roll is done continuously rather than at a particular point in time, as occurred with habitation reviews. Elector details are updated sooner than would otherwise have occurred, the roll is thus more accurate and up-to-date at any given point in time. Over time, it should also reduce enrolment changes at close of rolls, as many would have been captured and processed earlier.

¹² DIMIA = Department of Immigration and Multicultural and Indigenous Affairs

¹³ RMANS = Roll MANAGEMENT System. RMANS is the AEC's computerised roll management system that is used to maintain Commonwealth and most State and Territory electoral rolls.

¹⁴ Targeted doorknocking differs from earlier habitation reviews in that field officers visit only addresses specifically identified as requiring review, for example because the residents have not responded to previous AEC letters. Under habitation reviews, field officers visited every residence in a review area.

2.14 Another advantage of CRU to the AEC is that the roll better meets the needs of its joint roll partners. These stakeholders require an accurate roll at different times, not just close to federal elections, to facilitate electoral events for States, Territories and local government.

Emphasis on addresses rather than electors

2.15 CRU was a fundamental shift in the way AEC managed the electoral roll and the enrolment process. Habitation reviews concentrated on electors; the AEC identified electors and placed them on the roll at the address where the field officer interviewed them.

2.16 By contrast, CRU is an address-based methodology heavily reliant on making contact with individuals living at identified addresses. When the AEC has evidence from its data sources that a change has occurred at an address, this triggers commencement of CRU activities to update the enrolment for that address.

2.17 The ANAO considers that the CRU methodology is an effective means of managing the electoral roll and is capable of providing a roll that is highly accurate, complete and valid.

Implementation of CRU by the AEC

2.18 In 1996, the AEC commenced a pilot study in Queensland using Australia Post data to assess the viability of CRU. CRU activities were introduced nationally in 1999. The last habitation review was undertaken in 1998.

2.19 National implementation of CRU has been constrained by the AEC's capacity to gain access to State and Territory data sources. This in turn has affected its ability to identify electors and to encourage correct enrolment.

2.20 The ANAO notes that the AEC has not yet completed the full cycle of CRU activities. Some segments of the original proposal have not yet been implemented or are only partially implemented. Targeted fieldwork, follow-up of those individuals who have not responded to AEC letters, has been partially implemented. Background review,¹⁵ to confirm the ongoing accuracy of the 60 per cent of enrolments that have not changed during the cycle, has been undertaken only in South Australia and the ACT.

¹⁵ Background review is designed to confirm enrolment accuracy whilst avoiding making contact with electors unnecessarily. It involves confirming the accuracy of enrolment information against other, third party, sources. For example, if a match on name and address was made between the electoral roll and, say, motor transport information, then that enrolment information would be considered reviewed. The AEC would consider that enrolment information to be accurate and not approach those electors during that review cycle.

2.21 Whilst noting the potential benefits of CRU, the ANAO found that to date CRU has developed in an ad hoc manner, without the benefits of strategic planning and risk management by the AEC that would maximise its effectiveness. In particular, there has been an inconsistent approach across States and Territories due in part to their differing levels of cooperation with the AEC.

2.22 This contrasts with the approach prior to CRU when habitation reviews were conducted at regular intervals and national standards and procedures were common across all States and Territories.

Recommendation No.1

2.23 To achieve a consistent approach across all States and Territories in managing the electoral roll, the ANAO recommends that the AEC develop a strategic plan for the CRU that:

- sets out national standards for updating the electoral roll;
- identifies and addresses gaps in the existing CRU program; and
- sets a timetable for implementation of a consistent national CRU program.

AEC Response

2.24 The AEC agrees with the recommendation. The AEC advised that it has identified enrolment and CRU as strategic priorities in the current strategic plan and that its goal is to achieve a consistent national CRU program. An immediate priority is the accessing of a broader range of data sources to achieve greater coverage of addresses and potential eligible electors. The AEC anticipates that it will be another 12–18 months before a fully mature CRU program, able to identify and review all addresses, will be available.

2.25 Areas not currently addressed by the CRU program have already been identified by the AEC, specifically, youth, remote and indigenous electors. Statistics show a steady improvement in youth participation where processes targeting youth have already been implemented. Strategies to address the limitations of existing coverage in respect of remote areas and indigenous electors have been identified and are currently being evaluated.

2.26 The AEC has determined the cycle of CRU activity and expects that a national timetable will be fully implemented during 2002–2003.

Identifying and addressing CRU data requirements

2.27 The AEC uses data from various sources for data-matching. Most data for CRU comes from Commonwealth sources. However, State data sources have

proved to be most effective for early identification of electors who change address. A person moving house is more likely to advise their new address to a rental bond board or to power and water authorities, or to update their driver's licence or car registration, all the domain of State and Territory authorities, before they inform the AEC.

2.28 The AEC has found that each data source has strengths and weaknesses in progressing CRU and has used a mix of data sources to increase its coverage.

2.29 Commonwealth data sources such as Australia Post and Centrelink have the advantage of national coverage but have large numbers of records of little use to the AEC because the AEC concentrates on residential addresses. Australia Post provides the AEC with approximately 124 000 change of address (COA) records each month but it contains large numbers of unusable business and post office box addresses. Australia Post data is limited in that not all persons moving address institute a Mail Redirection Service, and thus their relocation is initially unknown to both parties.¹⁶ The AEC also uses Centrelink data but has found significant levels of mismatch of addresses that limit its data-matching.

2.30 Limitations in coverage by Commonwealth data sources created a need for the AEC to seek other data sources to fill the gaps. State and Territory data sources are increasingly being used where they are made available by the relevant State electoral authority or State agencies. However, provision of State data has been uneven, resulting in uneven CRU coverage across States and Territories.

2.31 Table 1 shows data sources currently being used for CRU, those where access has been or is being negotiated, and those identified as suitable future sources. The table shows that AEC has access to at least some State data sources in most States and Territories. Additional data sets have been identified to expand the potential coverage in some States and Territories, and negotiations continue with mixed success.

2.32 The most notable gaps in coverage are in the two most populous States. In New South Wales no State agencies' data (apart from Fact of Death data) are available for electoral purposes whilst in Victoria the State electoral authority has access to State agencies' data for its own purposes but does not provide that data to the AEC.

2.33 Table 1 shows the progress the AEC has made in obtaining the required data, but a number of gaps remain. Gaps in coverage limit the effectiveness of CRU and the consistency of AEC roll management across all States and Territories. At the same time the AEC does not have access to a source of data that will identify all potential electors.

¹⁶ Australia Post advised the ANAO that around 85 per cent of individuals changing address currently use this service.

Table 1**Data sources used or pending for CRU data-matching**

	NSW	VIC	QLD	SA	WA	TAS	ACT	NT
Commonwealth sources								
Australia Post	✓	✓	✓	✓	✓	✓	✓	✓
Centrelink	✓	✓	✓	✓	✓	✓	✓	✓
DIMIA Citizenship Database	✓	✓	✓	✓	✓	✓	✓	✓
State/Territory sources								
Boards of Studies		✓#		?		?		?
Fact of Death File	✓	✓	✓	✓	✓	✓	✓	✓
Land Administration				✓	✓			?
Motor Transport Authorities		✓#	✓	✓	?	*	✓	✓
Power Companies		✓#				?		*
Public Housing		✓#			?			?
State Revenue Offices		✓#						
Rental Bond Authorities		✓#	✓	?				
University Admissions Centre		✓#				?		
Water Companies		✓#						*

Legend:

- ✓ Data source currently used for CRU data-matching
- * Agreement to obtain data achieved and/or awaiting data from source agency
- ? Identified future source of information—access to be negotiated
- # CRU matching and mailouts with these data sources are undertaken by the Victorian Electoral Commission.

Source: ANAO prepared from information supplied by the AEC and State electoral authorities.

2.34 The AEC does not have access to State agency data in New South Wales and Victoria. While the Victorian Electoral Commission (VEC) has negotiated access to a broad range of State-based data, none of this data is provided to the AEC. The VEC obtains data from 13 Victorian agencies for its own data-matching activities with the Victorian State electoral roll. The VEC uses electors' responses to update the Victorian State roll and then passes the cards it receives to the AEC for updating of the Commonwealth roll.

2.35 Because individuals are likely to advise several organisations of their change of address, the AEC often obtains duplicate information from different sources.¹⁷ The ANAO considers the rate of overlap is not large and that any overlap is offset by the advantages gained in using a diverse mixture of data sources.

¹⁷ The AEC has procedures in place to ensure that in these cases it does not send out duplicate letters. Similarly, if an elector has already advised the AEC of a change of address then other sources repeating this information will be disregarded.

2.36 For example, the AEC considers that Centrelink data is a good source for identifying older Australians who, for various reasons, had not enrolled when first entitled to do so.

2.37 AEC success rates obtained from CRU mailouts vary considerably depending on data sources. This is shown in Table 2 and supports the need for diverse sources of data.

Table 2
CRU - Enrolment responses for 2000–2001

Data Source	Addresses mailed by the AEC	Enrolment forms resulting from each source	Percentage of letters resulting in enrolment forms
Australia Post			
COA First Letters	614 676	241 265	39.25%
COA Reminders Letters	193 768	57 311	29.58%
Centrelink			
COA First Letters	734 832	231 222	31.46%
COA Reminder Letters	183 190	87 321	47.67%
COA 17 & 18 Year Olds	119 298	41 350	34.66%
Queensland Transport	794 925	214 865	27.03%
Qld Rental Tenancy Authority	166 081	89 788	54.06%
SA Motor Transport	91 882	43 008	46.81%
WA Department of Land Administration	12 379	10 852	87.66%

Source: ANAO prepared from AEC data. COA = Change of address

2.38 From Table 2 it is clear that although some large data sets have lower response rates, the scale of individuals identified results in large numbers of enrolment transactions being received by the AEC. Some data sets have significantly better response rates but are small and might generate too few enrolments to warrant continued use.

2.39 The ANAO noted that data from State and Territory agencies used by the AEC for CRU are supplied on the basis of available data State electoral authorities can obtain from State agencies, rather than whether it will best facilitate an effective CRU program.

2.40 The audit concluded that an optimal suite of data sources can be identified, a mixture of Commonwealth and State/Territory sources; this is shown in Table 3. The ANAO considers that, where they are not currently available, the AEC should pursue this data from each State and Territory.

Table 3
Desirable CRU data sources

Source	Target group of electors
Australia Post (Commonwealth)	National change of addresses
Centrelink (Commonwealth)	Persons receiving benefits; unemployed; aged; itinerants; youth
Motor Transport (State/Territory)	Drivers; car owners; youth applying for first licences
Fact of Death Files (State/Territory)	Deceased persons
Rental Bond Boards (State/Territory)	Private accommodation renters
Public Housing Authorities (State/Territory)	Public accommodation renters
State Revenue and/or Land Titles Offices (State/Territory)	Home purchasers
DIMIA (Commonwealth)	New citizens

Source: ANAO

2.41 Data sources used for CRU activities should be continually monitored by the AEC to ensure that data-matching uses the most effective sources. This will mean that the mixture of data sources might change over time, as better sources of information become available.

Recommendation No.2

2.42 To maximise the benefits of its data-matching activities in maintaining the electoral roll, the ANAO recommends that the AEC:

- determine an optimal suite of data required to implement an effective national CRU program;
- monitor data sources used for CRU to ensure the most effective sources are identified and used; and
- monitor enrolments obtained from non-CRU activities to identify potential gaps in data-matching coverage.

AEC Response

2.43 The AEC agrees with the recommendation. The AEC advised that its access to a range of data sources, particularly State based data, is currently restricted. It proposes to seek advice on the possibility of broadening its demand powers in relation to State agencies, currently limited to police, statistical and electoral officers. The AEC has scheduled a review of the statistical and reporting function within its RMANS system, to improve and facilitate the measurement of CRU activity and enable assessment of the effectiveness of data sources used.

Accessing data sources

2.44 Access to State data has increased over time as the potential of CRU to be an effective enrolment strategy has emerged. Positive results from early trials in Queensland encouraged other State electoral authorities to approach their State agencies for similar data to that used for the trials.

2.45 However, the effect of the lack of a consistent national approach to obtaining adequate State data is reflected in enrolment statistics for the different States and Territories (see Table 4). The ANAO considers that they indicate underlying trends in the management of the Commonwealth roll that require review.

Table 4

Differing enrolment results from AEC CRU activities across States and Territories 2000–2001

State/Territory	Number of electors at the 2001 federal close of rolls	Total enrolment transactions for 2000–01	CRU generated transaction for 2000–01	CRU transactions as a per cent of total transactions
New South Wales	4 204 383	602 577	373 793	62.0%
Victoria	3 218 746	479 319	252 366	52.7%
Queensland	2 319 481	615 729	579 239	94.0%
South Australia	1 034 377	193 439	116 840	60.4%
Western Australia	1 200 438	269 489	133 944	49.7%
Tasmania	328 829	67 115	29 312	43.7%
ACT	219 876	36 301	16 295	44.9%
Northern Territory	110 501	22 557	9 771	43.3%

Source: ANAO prepared from AEC data. 2001 close of rolls - 8.00 pm 15 October 2001.

2.46 Queensland has significantly higher pro rata levels of enrolment forms received and processed than other States and Territories. Queensland also has the highest proportion of enrolment forms resulting from CRU activities (94 per cent of all enrolment forms received by the AEC in Queensland resulted from CRU activities) suggesting that the AEC is capturing accurate information as electors' details change. CRU was piloted in Queensland and the AEC has had access there for some time to richer sources of data. The quality of this data allows the AEC to maintain a more up-to-date roll in a State with a highly mobile population.

Recommendation No.3

2.47 To improve the effectiveness of the CRU program, the ANAO recommends that the AEC:

- identify more effective arrangements to progress negotiations with States and Territories for access to relevant data sets; and
- actively pursue access to all data sets that it considers essential to ensure efficient and effective management of the Commonwealth roll.

AEC Response

2.48 The AEC agrees with the recommendation. It advised that it will pursue these initiatives during renegotiation of the Joint Roll Arrangements with the States and Territories and with future JSCEMs.

Demand powers

2.49 The AEC has demand powers to require provision of information on electors. Under s.92(1) of the *CE Act*, the AEC can demand:

all such information as the Electoral Commission requires in connection with the preparation, maintenance or revision of the Rolls.

2.50 The *CE Act* also specifies that the AEC can request information from:

all officers in the service of the Commonwealth, all police, statistical, and electoral officers in the service of any State, officers in the service of any local governing body, and all occupiers of habitations.

2.51 The ANAO notes that the AEC has been reluctant to invoke its demand powers to assist in obtaining data for CRU, but rather has relied on negotiation and cooperation. This has largely depended on the goodwill and interest of State electoral authorities, in many instances informed and coordinated collegiately through the CISCO committee of the Electoral Council of Australia.

2.52 Most State electoral authorities have powers under their legislation to demand information from State agencies. Like the AEC, State electoral authorities have been reluctant to use such powers, preferring to develop co-operative arrangements with relevant agencies.

2.53 While the New South Wales State Electoral Office has demand powers similar to the Commonwealth,¹⁸ it provides no access for the AEC to State-agency data, relying on the opinion that NSW privacy legislation restricts it from approaching State agencies for data.

¹⁸ Section 31, *Parliamentary Electorates and Elections (NSW) Act 1912*.

2.54 ANAO review of NSW State privacy legislation¹⁹ suggests that there is no obvious impediment to accessing relevant State data sets for the purpose of maintaining the electoral roll. Before data could be provided, the supplying agency would need to inform its clients that information was to be provided to the State electoral authority and to the AEC for the purposes of updating the electoral roll.

2.55 At the end of the audit, the NSW State Electoral Office advised the ANAO that it is exploring methods whereby NSW may supply data to the AEC similar to those provided by other jurisdictions.

2.56 The AEC advised that, in 1999, it had attempted to use its demand powers to obtain access to State data but was unsuccessful. The AEC advised the ANAO that it did not believe that its demand powers were extensive enough to allow it to demand data directly from State agencies where a State electoral authority was unable or unwilling to pursue the matter.

2.57 The ANAO considers that the 1999 attempt to invoke its demand powers was somewhat unspecific and that up to this time the AEC has not rigorously tested their effectiveness. It was apparent that the AEC, when requesting data, did not clearly state that the request was made under specific demand powers. Where the AEC is unsuccessful in obtaining State data through negotiations and cooperative efforts, the ANAO considers that the AEC should fully test the use its demand powers. If in testing these powers the AEC finds them inadequate, the matter should be brought to the attention of the Government for consideration.

2.58 The ANAO also noted that AEC demand powers have no penalties or sanctions that the AEC could cite or apply if their request for information is refused. The ANAO considers that s.92(1) of the *CE Act* could be strengthened to assist the AEC to obtain data to effectively manage the Commonwealth electoral roll.

Payment for data

2.59 The AEC currently purchases data from both Australia Post and Centrelink and also from some State sources. Payment for data varies from agency to agency, from full commercial rates to cost recovery or a nominal fee. Some sources provide data at no charge.

2.60 In addition to being a user of data from other organisations, the AEC is required by legislation to provide the electoral roll, in electronic or microfiche format, to several Commonwealth departments and agencies.

¹⁹ *Privacy and Personal Information Protection (NSW) Act 1998*.

2.61 The *CE Act* allows the AEC to charge users for its services. Anomalous situations can arise where the AEC provides data to an organisation free of charge but from the same organisation purchases data for roll updating purposes.

2.62 The ANAO suggests that it would be beneficial for the AEC to develop a consistent pricing policy for data provided to, or obtained from, external organisations; and to review pricing arrangements with customers where there is reciprocal exchange of data.

Issues affecting the effectiveness of CRU

AEC correspondence

2.63 The AEC has several standard CRU letters it forwards to electors. Change of address letters invite the recipient to complete and return an enrolment form; a multiple enrolment limit²⁰ letter requests that the main elector confirm enrolment details for that address; and letters to school-leavers invite them to enrol to vote.

2.64 The ANAO found that the style and layout of AEC letters generated by CRU activities varied in presenting a clear, 'user-friendly' message, and in requesting information in a non-officious way. The ANAO considers that the effectiveness of CRU mailouts could be markedly impacted by the quality of the letters.

2.65 The ANAO noted research that indicated that response rates to AEC letters to young people would improve if they were advised of their legal responsibility to enrol and that penalties applied for non-compliance.

Recommendation No.4

2.66 To improve the effectiveness of its correspondence with electors, the ANAO recommends that the AEC:

- review and revise, as appropriate, CRU correspondence to electors; and
- include in future correspondence reference to a citizen's legal obligation to enrol to vote and the penalties that apply for non-compliance.

²⁰ Each address contained in the electoral roll has a limit on the number of electors that can be enrolled concurrently at that address. By default this limit is set at four electors for the majority of residences, but is set higher for identified institutions, nursing homes, caravan parks and so forth. There are also limits on the number of different surnames that can be enrolled concurrently at the same address. *Multiple enrolment limit letters* are sent to electors at addresses where those limits are exceeded.

AEC Response

2.67 The AEC agrees with the recommendation. The AEC advised that a review of all enrolment and CRU forms and letters is planned for 2002–03 as a priority. Consideration will be given to including reference to a citizen's legal obligation to enrol and vote, the penalties for non-compliance, and access to roll data, during the planned review.

Australia Post mail delivery

2.68 CRU relies on an effective postal service. CRU-generated letters can be addressed to a specific person, when the AEC knows the individual's name, or 'to the Resident', where the AEC does not know who lives at a particular address.

2.69 The ANAO observed opportunities for Australia Post mail delivery practices to significantly improve the effectiveness of CRU activities as large numbers of AEC letters were returned to Divisional offices undelivered. It was noted that, in some rural areas, mail contractors did not deliver mail unless it was addressed with the correct name of the resident.

2.70 Mail returned unclaimed or undeliverable can provide useful intelligence to the AEC but the value of this intelligence depends on the quality of the information provided with a returned letter. Letters are returned to AEC Divisional offices (once identified as undeliverable) for a variety of reasons. These include:

- refusal of addressee to accept item;
- no mailbox for delivery;
- no delivery at a particular address because of an onforwarding request for fully addressed mail; and
- incorrect address.

2.71 In discussion with AEC State HOs and Divisional staff it was identified that, in some circumstances, the process of achieving resolution of issues on a State by State basis varied considerably. Some offices reported that improvements in CRU mail out effectiveness had been achieved through proactive management of their relationship with Australia Post. Both HOs and Divisions in different States had initiated this approach with positive overall outcomes.

2.72 With a view to further improving CRU performance, Australia Post undertook to reinforce the process with staff for better annotating the reasons as to why the letter is undeliverable. In addition, Australia Post will ensure the mail contractors (referred to above) are reminded of their requirement to deliver all CRU mail. These initiatives, when in place, should improve the effectiveness

of CRU mailouts, through the return of more detailed data regarding reasons for non-delivery.

2.73 The ANAO considers that communications between all levels of the AEC and Australia Post could be further strengthened by the development of a Memorandum of Understanding (MOU) between the two agencies. The MOU could include:

- principles and expectations of each party to the MOU;
- services and products to be covered by the MOU (this could include COA data and postal services provided by Australia Post; and roll data provided by the AEC);
- standards of service and performance;
- financial arrangements;
- administrative arrangements;
- procedures for problem resolution; and
- mechanisms to investigate and address problems that might arise or persist in particular Divisions and /or States.

Using available technology

2.74 The introduction of CRU presented the AEC with opportunities to improve the efficiency of the enrolment process through greater use of technology. The ANAO considers that more centralised processing and greater use of scanning technology could provide significant cost savings in the current enrolment process. The AEC's Divisional structure currently precludes the AEC fully realising the benefits of technology.

Automatic updating of elector information

2.75 Greater efficiencies could be obtained and CRU could be further streamlined through automatic updating of the roll using information provided from reliable third party sources. Automatic updating of enrolment information is possible through cross matching the electoral roll to, and updating it from, reliable COA information provided by electors to other government agencies.

2.76 Automatic updating of elector information would require the AEC to have access to high quality data sources, where the agency receiving the COA information had verified the identity of the individual providing the information. Several Commonwealth agencies, including Medicare, currently require proof of identity before changing client records.

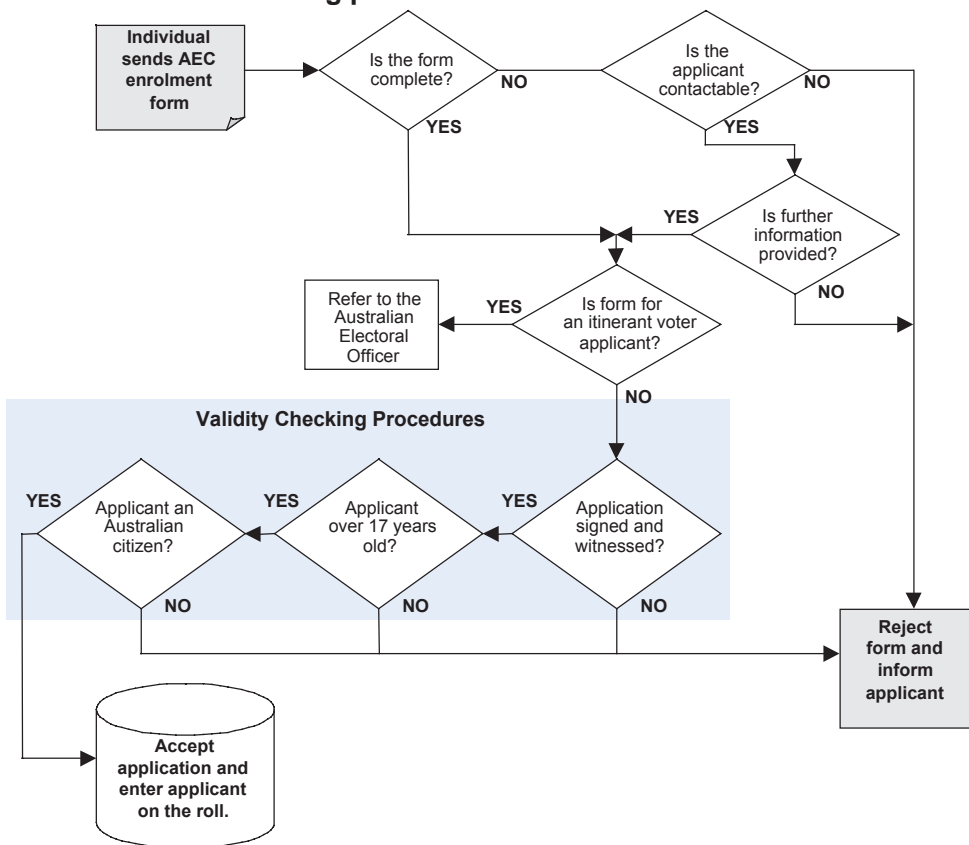
2.77 Automatic updating of the electoral roll from third party data already occurs in Canada.²¹ Some State electoral authorities have indicated interest in using verified third party data to automatically update State rolls.

2.78 The ANAO notes that the current Commonwealth legislation would preclude automatic updating of the electoral roll. Given concerns about potential enrolment frauds, there could be advantages in using third party data from sources where the individual’s identity had been verified to update the roll.

Enrolment processing and quality assurance procedures

2.79 All enrolment forms received by the AEC, whether through CRU activities or other means, are physically reviewed by AEC Divisional staff. Routine AEC procedures include checking for completeness, checking that citizenship has been confirmed by the applicant, and that the form is witnessed. These procedures are shown in Figure 2.

Figure 2
Enrolment form checking procedures



Source: ANAO prepared from the AEC General Enrolment Manual

²¹ The majority of changes to the Canadian electoral roll occur through automatic updating from third party data.

2.80 AEC checking procedures are designed to ensure that only eligible individuals are enrolled. Divisional Office staff investigate where there is uncertainty about any information on the enrolment form.

2.81 The *CE Act* requires enrolment forms to be processed without delay unless AEC staff have reason to question the information. Most enrolment forms are accepted as valid claims unless there is a reason to undertake further verification. This may involve reviewing previous enrolment forms from the elector or directly contacting the elector and/or the witness.

Removing people from the roll

2.82 Electors are removed from the roll through what is known as an objection process.²² In 2000–2001, the AEC removed 226 442 electors by objection action.

2.83 The objection process is shown at Appendix 1. The ANAO noted that the AEC objection process complies with the requirements of the *CE Act*. However, it is lengthy and time-consuming. Some State electoral authorities expressed concern to the ANAO about the time taken to remove incorrectly enrolled electors from the roll and the involved processes required.

2.84 The 1996 CRU Study commissioned by the Joint Roll Council recommended that studies be carried out to establish the cost of the existing objection procedures; this has not occurred. The ANAO believes that there could be benefits in reviewing the objection process to make it more streamlined and efficient. However, any substantial change to the objection process would require amendment to legislation.

AEC procedures manuals

2.85 The AEC has procedure manuals to inform staff of AEC policies and ensure consistency in the procedures for reviewing and processing enrolment applications. The ANAO concluded that AEC staff observing the procedures set out in these manuals would comply with Commonwealth electoral legislation.

2.86 The ANAO noted that State HO and Divisional Offices rely on printed copies of procedure manuals and considers that providing them in a useable form on-line with relevant supporting material would enhance efficiency in processing and reviewing enrolments.

²² *CE Act* ss.116–118. The exception is deceased electors who are not removed through the objection process. When the AEC is notified of a death, or receives information on the national Fact of Death file, the electoral roll can be amended directly from the information provided. 105 470 death deletions occurred in 2000–01.

Monitoring of compliance with procedures

2.87 The ANAO noted that quality assurance of enrolment activities including compliance with policies and procedures is the responsibility of DROs.

2.88 State HOs are responsible for the work of Divisions within their State but do not appear to have mechanisms to ensure compliance with policies and procedures at Divisional level.

2.89 The ANAO considers compliance monitoring is important to ensure the consistency of enrolment procedures nationally, to identify areas where policies and procedures could be improved and to identify and promulgate better practice. Where good quality assurance mechanisms are in place in a State HO, the AEC could usefully acknowledge these and promulgate similar good practice to other HOs.

2.90 CRU processing could be used to identify Divisions that have a persistent error rate. In some HOs there is coordination between officers responsible for CRU in the State and area managers responsible for overseeing work of Divisional Offices. Area managers should liaise with Divisional Offices where higher CRU error rates prevail, to ensure that the quality of their work improves.

Performance measurement

2.91 Measurement of performance and the use of performance indicators are critical tools in the overall management of the APS programs. Reporting performance against objectives and targets assists accountability by providing assurance to Parliament, stakeholders and the public that agencies are setting appropriate targets and are measuring their performance in achieving outcomes. The ANAO noted that performance targets identified in the AEC Portfolio Budget Statements (PBS) do not provide an insight into the quality of the electoral roll.

2.92 The AEC has developed a structure which allows performance against its Strategic Plan and National Operational Plan to be assessed. The ANAO noted that the management information available on enrolment activities and the management of the roll are not sufficient to provide AEC stakeholders with a comprehensive assessment of performance.

Management information systems

2.93 The ANAO found that the AEC management information system does not provide adequate information on management of the electoral roll. Areas that can be improved include preparing information from AEC data on the accuracy, completeness and validity of the electoral roll, the accuracy of the address register and the unit cost of the various enrolment activities undertaken by the AEC.

2.94 Shortcomings in its management information systems limit AEC's ability to analyse its performance; to monitor the implementation and impact of initiatives, such as CRU; and to identify better practice to assist it in ensuring cost effective service delivery. It also limits the AEC's ability to provide its major stakeholders with their information needs. For example, at JSCEM hearings into the integrity of the electoral roll in 2001, the AEC was unable to provide the Committee with information on the accuracy of the roll.

2.95 The ANAO considers that the development of a more effective management information system would improve:

- the AEC's capacity to manage its activities more effectively; and
- enable it to better meet the information needs of its stakeholders.

Recommendation No.5

2.96 To enhance AEC ability to use its existing information on the electoral roll better and manage the roll more efficiently and effectively, the ANAO recommends that the AEC upgrade its management information systems to enable:

- measuring and reporting of:
- the accuracy, completeness and validity of the electoral roll;
- the accuracy of the address register; and
- the cost of its various enrolment activities; and
- monitoring of the implementation and impact of initiatives, such as CRU.

AEC Response

2.97 The AEC agrees with the recommendation. The AEC has identified the enhancement of its management information systems as a priority for 2002–2003.

Performance targets

2.98 In its 2001–02 PBS, the AEC specified four performance targets for *Output 1 – the Electoral Roll*:

- 95 per cent of eligible people are on the electoral roll;
- a minimum of 2.3 million enrolment transactions (not being deletions) are processed per annum;
- enrolment forms are processed within three business days of receipt; and
- each entry on RMANS database costs less than \$2.75.

2.99 For *Output 2—Electoral Roll Updates*, the AEC specified four performance targets:

- vacant addresses eligible for enrolment are maintained at 10 per cent or less after allowance for non-citizens;
- 2.5 million habitations reviewed per annum;
- 1.4 million enrolments transactions processed from review activities; and
- habitation reviews cost less than \$4.50 per household.

2.100 For 2000–01 the AEC set similar targets for these activities. The AEC reports in its latest Annual Report that most of those targets were met.²³

2.101 The ANAO noted that all performance targets identified in the AEC PBS were quantitative, and did not provide insight into the quality of AEC management of the roll.

2.102 The AEC maintains a wide range of statistics on vacant addresses, change of addresses, return mails and targeted review results; and RMANS collects a variety of data from AEC's activities in relation to the electoral roll and enrolment forms. There is a wealth of material from which to abstract useful management information.

2.103 The ANAO considers that the AEC could report on performance indicators that better reflect the mission, objectives and range of its functions. The following examples are areas in which the AEC has not developed performance indicators:

- the accuracy of elector enrolment information (relates to Output 1 above);
- the accuracy of the address register (relates to Output 1); and
- the extent to which data sources used in CRU activities include all the targeted populations (relates to Output 2).

2.104 Other specific performance indicators that could be used to inform the AEC of the accuracy, completeness, validity, timeliness and cost of the electoral roll include:

- a benchmark comparison between the electoral roll and other national statistics, such as Census data;
- results from comparing the electoral roll to other databases. For example, results from comparing the roll to DIMIA citizenship data could provide an indication of the level of invalid enrolments, an issue of recent concern to the JSCEM;

²³ *Annual Report 2000–2001*, Australian Electoral Commission, pp. 21, 25.

- results from specific enrolment initiatives, for example the success of education programs in obtaining increased enrolments from target groups;
- number of eligible electors found not to be enrolled;
- number of corrections, amendments and reinstatements—this would provide information on the level of inaccuracy being detected;
- number of electors previously on the roll but for whom a current address is not known; and
- the real cost of maintaining the roll using CRU.

Performance reporting

2.105 The audit found that the AEC does not have a systematic performance measurement framework in place to regularly report to:

- the AEC executive, on performance of electoral roll management;
- AEC staff, on their work performance;
- State HOs and Divisional Offices, on key information relating to their roll responsibilities;
- joint roll partners, on AEC's performance in maintaining joint rolls; and
- Parliament, on AEC's management of the electoral roll.

2.106 The ANAO found that some performance information is prepared *ad hoc* in CO, often in response to specific questions from Parliament. Little of this information is reported formally to AEC management on a regular or continuing basis.

2.107 The ANAO considers that the AEC should develop a suite of performance measures and benchmarks to regularly report to AEC management on the integrity of the electoral roll. In particular, State HOs and Divisional Offices could benefit from comparative tables of State and Divisional performance to enable internal benchmarking and to stimulate and assist in performance improvement.

Recommendation No.6

2.108 To improve accountability, and to provide greater assurance that the electoral roll is being managed effectively, the ANAO recommends that the AEC identify and implement a suite of performance indicators that:

- are relevant and appropriate for measuring enrolment activities;
- contain both qualitative and quantitative measures; and
- address the needs of the different stakeholders of the AEC.

AEC Response

2.109 The AEC agrees with the recommendation. The AEC recognises the need for improved performance indicators and will integrate this with its review of its management information systems.

Use of census data

2.110 The ANAO noted that the 2001 Census will provide the AEC with the opportunity to compare the electoral roll to census results through a comparison of the potential and actual numbers of electors. The AEC will compare a copy of the roll taken on census night with census results when these become available in mid 2002.

2.111 The ANAO considers that 2001 Census data will help the AEC to better target its CRU and general enrolment activities by identifying Divisions with high mobility rates and high risk factors for non-enrolment.

2.112 In 1999 the AEC considered engaging ABS to evaluate aspects of roll data. When up-to-date census data becomes available in 2002, there could be merit in the AEC reviewing this proposal.

AEC operational structures

Divisional structure

2.113 The AEC Divisional structure, developed in the early days of federation to address isolation and communication difficulties, today presents intrinsic problems for the AEC. In particular it makes it difficult to manage large variations in workload between Divisional Offices, can work against the AEC achieving efficiencies through centralisation of its move to computer-based CRU, and can create rigidity and limit career opportunities for Divisional staff.

2.114 Each Division is managed by a DRO and staffed by at least three officers. The typical structure of most Divisional Offices is one DRO (APS level 6), a Divisional Clerk (APS level 3) and a Division Office Assistant (APS level 2). Four hundred and fifty of the AEC's 826 full time equivalent staff at 30 June 2001 were located in Divisional Offices.

Accommodation expenses

2.115 The AEC structure results in a large proportion of its budget being expended on accommodation costs. In 2000–2001, accommodation accounted for 11.3 per cent of the Commission's total expenditure on delivering its outputs.

2.116 In some States and Territories, particularly in metropolitan areas, efficiencies have been achieved through co-locating Divisional Offices. With co-location two or more Divisional Offices retain the same staffing levels but are located in the same building. To date a total of 31 Divisional Offices in all States and Territories have been co-located.

2.117 Although staffing numbers remain the same, there can be some efficiencies achieved through co-location. The ANAO understands that such benefits have not been realised where Divisional Offices are co-located but maintain rigid separation of duties.

Staff considerations

2.118 Other difficulties arising from the AEC staffing structure include:

- isolation of staff. Outside metropolitan areas Divisional Offices are widely spread and opportunities to liaise with other AEC staff can be limited;
- operational difficulties when staff are absent on leave. Because staff numbers in Divisional Offices are low, any absence of staff can lead to restrictions on services and at times in offices having to close altogether;
- jobs in Divisional Offices are largely operational, limiting opportunities to advance into more policy oriented areas of the AEC; and
- there are limited career paths for Divisional staff. The wide gap between the DRO's position and that of the Divisional Clerk, and between the DRO and positions within HO, limit progression for Divisional staff.

2.119 The AEC has not been able to benefit, to the same extent as other agencies, from flexibilities in staffing and resourcing introduced by public service reforms since the early 1980s. The ANAO considers that there are opportunities to improve the efficiency and effectiveness of the enrolment process but that the present AEC organisational structure required by legislation restrains such opportunities.

Performance agreements with AEC staff

2.120 The use of performance agreements and regular performance assessment of staff is now the norm in the APS. Performance assessment can assist managers and staff to identify their strengths and weaknesses and provide an avenue for improvement in staff performance and morale.

2.121 Effective strategic planning and performance assessment processes could align organisational performance management to AEC corporate plans, business plans and output reporting. This could be particularly beneficial for an organisation, like the AEC, that is geographically dispersed.

2.122 In their 1998–2000 Certified Agreement, AEC staff agreed to the introduction of performance management. There was a similar agreement in the 2001–03 Certified Agreement that states that the AEC is *committed to implementing effective performance management arrangements for all employees*.

2.123 To date, the AEC has not implemented a system of performance appraisal and feedback to AEC staff. Implementation of a formal performance appraisal scheme for all staff was to be introduced from 1 July 2001. However, it was deferred and replaced by a leadership program for senior managers.

2.124 The ANAO notes that it has been more than three years since AEC staff initially agreed to have performance appraisals and feedback. The ANAO considers that the lack of performance agreements between AEC management and staff is a limitation in managing staff performance and in ensuring implementation of AEC's output targets.

2.125 The AEC advised that a performance management program has been developed for all AEC employees at the APS and Executive levels. The AEC plans to hold information and training sessions between October 2001 and June 2002 and introduce the performance management program from July 2002.

Communications between AEC staff

2.126 The ANAO believes that communications in the AEC could be improved, particularly in regard to sharing knowledge and good practice in implementing CRU. Communication amongst the different offices appeared to be uneven.

2.127 Some State HOs have tried to improve communications and training and combat isolation by setting up committees involving Divisional staff to report on operational issues. One feature of such committees is that they operate strictly within State boundaries.

2.128 The ANAO considers that there are opportunities for better communication and liaison across State borders particularly between Divisions facing similar challenges. For example, those Divisions that include large areas without mail deliveries need to develop alternative strategies to identify and enrol eligible individuals. The audit noted that the Division of Kalgoorlie (WA) has developed and implemented remote area strategies that could be effective in Divisions in remote localities in South Australia, Queensland, New South Wales and the Northern Territory.

2.129 Regular contact amongst cross-border staff in Divisions with similar characteristics could act as a useful framework for interchange of strategies and for promoting the dissemination of better practice across the AEC. One option to facilitate such an exchange of information could be for the AEC to develop a '*lessons learned*' database as part of its intranet.

2.130 The ANAO considers that, to improve internal communication and disseminate better practice, the AEC should review its existing communication practices to develop and encourage networks across State boundaries to facilitate interchange of information amongst Divisions with similar characteristics and challenges.

2.131 There has been ongoing concern within staff of some Divisions about the introduction of CRU and the abandonment of full-scale habitation reviews. Some DROs have voiced these concerns to the JSCEM. The ANAO considers that more effective communication to staff in Divisions about the importance of, and progress made through, CRU is required.

3. Stakeholder Relationships

Maintaining effective strategic relationships with key stakeholders is an important issue for the integrity of the electoral roll. This chapter examines AEC relationships with its major stakeholders including State and Territory electoral authorities, local government and the JSCEM.

Strategic relationships

3.1 An important issue identified during the audit was that of management of strategic relationships between the AEC and its key stakeholders. In some instances the audit observed that in the century since the first federal election, principles underlying the electoral system had come to be taken for granted by some stakeholders, and important relationships to have ossified. This appeared to be particularly evident with some whose cooperation and commitment is essential for effective management of the electoral roll.

3.2 The audit examined strategic relationships between the AEC and stakeholders including States and Territories, local government, and the JSCEM. While the ANAO acknowledges that the success or otherwise of these is an ongoing two-way process, overall we formed the view that key strategic relationships needed to be renewed, fundamental principles restated in contemporary terms and partnerships revitalised and restored.

Relationships with States and Territories

3.3 The States and Territories are key stakeholders in the management of the electoral roll. The formal mechanisms of these relationships are set out in Joint Roll Arrangements between the Commonwealth and each individual jurisdiction.

3.4 Commonwealth and State/Territory constitutional frameworks provide for separate electoral processes for each sphere of government. Each State and Territory has an electoral authority with its own enabling legislation; has its own rules for eligibility and voting; and has different strategies for overseeing its electoral authority.

3.5 At present, from the electors' perspective, the relationship between the Commonwealth and State and Territory authorities is a seamless one; most citizens would be unaware of their different regulations or responsibilities. The current joint enrolment procedure means that electors need only complete a single form for federal and State/Territory purposes. This, combined with a single point of data entry (by the AEC) and the maintenance of rolls on a single

database for most jurisdictions (except Victoria and Western Australia), provides significant economies for all involved.

3.6 The AEC has two main avenues for coordinating these relationships: Joint Roll Arrangements; and operational relationships between AEC State HOs and State and Territory electoral authorities.

3.7 The AEC also supports and serves on the Electoral Council of Australia, a consultative council of Commissioners and Chief Electoral Officers from Commonwealth, State and Territory electoral authorities. The three most senior members of the AEC executive hold three of the 12 Council positions. The Council meets every three months to consider issues relating to the roll, and administrative matters with implications for Australian electoral authorities.

Joint Roll Arrangements

3.8 Joint Roll Arrangements are signed by the Governor-General and Heads of State of States and Territories. Under Joint Roll Arrangements, which vary amongst States and Territories, the AEC either has day-to-day responsibility for the collection and processing of roll data (Victoria and Western Australia) or maintains a joint Commonwealth/State/Territory and local government roll with input from relevant State/Territory authorities. Under the Arrangements the States and Territories pay the AEC for services, calculated on a per elector rate, for maintenance of their joint rolls.

3.9 Until 1988, the States paid only nominal amounts for these services. In that year, the Prime Minister requested the AEC to enter into new Joint Roll Arrangements or re-negotiate existing Arrangements to secure for the Commonwealth an equitable contribution for the maintenance of the joint rolls.

3.10 In 1989, the AEC commenced a review of existing Arrangements. New Arrangements were negotiated with Queensland, Tasmania, the ACT and Northern Territory. Negotiations with NSW and Victoria reached a stalemate after four years of intermittent discussion. The impasse was solved when the Commonwealth served notice that it would withdraw from the existing Arrangements (which dated from the 1920s). By 1997 updated Arrangements were in place with all States and Territories, with the exception of WA, where one dating from 1983 remains in place.

3.11 Joint Roll Arrangements set out financial arrangements between the AEC and State/Territory electoral authorities. Although current payments to the AEC amount to only around 30 per cent of the full cost of maintaining the joint rolls, the move to even limited cost recovery has generated significant ongoing tensions.

3.12 The audit noted that current Arrangements do not adequately address AEC administrative costs. States have argued that they will not support the AEC's widespread Divisional structure and so do not contribute to AEC permanent staff costs or overheads.

3.13 While current Arrangements vary in their scope and detail, most do not take account of recent developments of CRU and of AEC use of data from various State agencies for CRU. Some State electoral authorities expressed concern to the ANAO that while they pay for AEC services, they receive no credit for the data that they obtain from State sources for the AEC to process.

3.14 The ANAO considers that particular clauses in the most recent Joint Roll Arrangements, those with South Australia and Victoria, could usefully be included in all future Arrangements. They commit the State Electoral Commissioner to using his/her best endeavours to make available to the AEC any information that may improve the accuracy of the roll, and they set out principles for cost recovery by the State from the AEC.

3.15 As discussed under *demand powers* in Chapter 2, the ANAO considers that where State Electoral Commissioners are unable to obtain or provide appropriate State data for the AEC, the AEC should use its authority under the *CE Act* to obtain the material directly from the relevant State agency.

3.16 The ANAO considers that robust Joint Roll Arrangements are critical to AEC management of its relationships with State and Territory electoral authorities. They need to set out the principles of the relationship, and be designed to assist all parties to transact and interact effectively. Above all, from the AEC perspective, they need to ensure the integrity of the Commonwealth roll.

Uncertainty in the future of joint enrolment procedures

3.17 The ANAO noted that since 1999, proposed Commonwealth changes to enrolment procedures have created uncertainty about the future of the current Arrangements. During this period, AEC relationships with a number of States have become increasingly unsettled.

3.18 Considerable uncertainty has stemmed from proposed Commonwealth regulations²⁴ that will require more rigorous verification of applications for enrolment through new witnessing and identification provisions.

3.19 These provisions received Royal Assent on 13 October 1999 and will commence on proclamation. The Government has delayed proclamation of the regulations pending negotiations with the States and Territories. The majority of States and Territories have expressed opposition to the new provisions.

²⁴ *Electoral and Referendum Amendment Act (No.1) 1999*, items 10, 11 and 12 of subsection 98(2).

3.20 Those opposed to the proposed regulations consider that they will act as a deterrent to enrolment by imposing onerous requirements on electors, particularly young people and those who are socially disadvantaged, and that separate Commonwealth and State/Territory enrolment requirements will result in confusion among electors.

3.21 The ANAO was advised that during the 1970s and 80s Western Australia had more stringent enrolment requirements than had the Commonwealth. During that period the State roll required enrolment applications to be witnessed by a qualified person, requirements similar to those set out in the proposed Commonwealth regulations. In 1983, when that requirement was removed, approximately 40 000 fewer electors were on the State roll than the Commonwealth roll for Western Australia. This represented three per cent of the Western Australian population of the time, excluded from voting at State elections.

3.22 The JSCEM report recommended that the proposed regulations be proclaimed. It was expected that they would be in place prior to the 2001 federal election, but this did not occur.

3.23 It is anticipated that when the proposed regulations are proclaimed, a number of States will no longer use the AEC enrolment form and will probably issue a separate State electoral enrolment form. If separate State enrolment forms were in use, largely duplicating the Commonwealth form, there could be a risk of confusion among citizens as to what is required of them. Separately managed State and Commonwealth rolls would also introduce a risk that over time the two rolls would differ. These risks would need to be effectively managed.

3.24 The *CE Act* does not prescribe the Joint Roll Arrangements, simply that they be consistent with its provisions. New Joint Roll Arrangements can be developed that can accommodate changes in the components of Commonwealth and State responsibilities and to fit new circumstances.

Intergovernmental coordination of electoral matters

3.25 The ANAO notes that while in other portfolios there has been a significant growth of inter-governmental coordination arrangements, many at Ministerial level, this has not been the case with electoral matters. While electoral matters are of key national significance, there is no Commonwealth-State agreement on coordination of electoral matters and no inter-governmental forum responsible for the electoral roll. While the AEC comes within the Finance and Administration portfolio, State and Territory electoral authorities come under various portfolios including Justice, Attorney-General's and Premier's departments. No Ministerial Council has been formed for electoral matters.

3.26 The ANAO considers that relationships between the Commonwealth and States and Territories in relation to the management of the roll need to be addressed at a strategic level. The principles behind the Joint Roll Arrangements need to be openly discussed, examined and reviewed.

3.27 The AEC might consider establishing dialogue with coordinating departments to examine the benefits and feasibility of establishing formal inter-governmental machinery to coordinate electoral matters and renew the existing consultative framework.

Operational Relationships

3.28 The audit found a need for improved coordination in the AEC of its operational relationships with States and Territories. At CO level there appeared to be more of a sense of formal partnership with States and Territories. The Commissioner, Deputy Commissioner and First Assistant Commissioner (Electoral Operations) are the AEC members on the Electoral Council of Australia and meet regularly with their State and Territory counterparts to discuss issues of common concern.

3.29 The audit noted that at the operational level, in State HOs and in Divisional Offices, where day-to-day interaction with State-level authorities takes place, the relationship was most often one between the Commonwealth as provider and the State or Territory authority as client, rather than partner.

3.30 As outlined in Chapter 2, as CRU has developed, State data sources have proved to be most effective for early identification of electors whose roll details have changed. Progress of CRU, critical to the integrity of the electoral roll, has become more dependent on the interest and willingness of AEOs to build and maintain cooperative relationships with State and Territory counterparts and to coordinate their efforts for strategic outcomes.

3.31 The impact of the different contributions of State data to CRU was evident in several indicators identified in the ANAO independent testing of the roll, including the level of exceptions in validity testing, completeness and youth enrolment. As outlined in Chapter 2, the AEC currently does not have access to State data from NSW and Victoria. As these are the most populous States, a small deviation in accuracy or completeness in NSW or Victoria data can have a significant impact on the Commonwealth roll.

3.32 The States achieving the best youth enrolment results were those that used CRU activities to target and enrol young people. Apart from the Northern Territory, that has special difficulties, youth enrolments were weakest in NSW, where the AEC has no access to State data for CRU. As shown in Table 5 in Chapter 4, NSW enrolment is below the national average for every cohort

between age 17 and 25. If the AEC could lift youth enrolment (17–25 year olds) in NSW to equal the average youth enrolment as a percentage of population of the other five States, this would add an additional 55 890 electors to the roll.

Managing strategic relationships

Partnerships with other electoral authorities

3.33 While the Joint Roll Arrangements set out strategic level inter-governmental arrangements, administrative agreements between the AEC and State and Territory electoral authorities could encourage them, within the strategic framework of the Arrangement, to identify common objectives and opportunities to work together more effectively.

3.34 The audit noted that the Joint Roll Arrangement with South Australia allows for *an Agreement to be entered into and varied from time to time between the Commonwealth Electoral Commissioner and the State Electoral Commissioner*.²⁵ The ANAO considers this a useful model that could be developed by the AEC as a strategy to strengthen relationships with all State and Territory electoral authorities.

3.35 AEC HOs and State and Territory electoral authorities have existing alliances and networks that can be built on to ensure that shared outcomes are met and public monies used in the most efficient manner. Agencies working in partnership with each other enable a greater exchange of ideas and information and can contribute to each organisation achieving its outcomes more effectively.

3.36 The ANAO considers that an effective administrative agreement could include:

- common principles and objectives;
- the services or products to be covered by the Agreement;
- service levels and performance standards;
- arrangements for monitoring, measuring and reporting performance;
- financial arrangements;
- administrative arrangements;
- a mechanism for the review of services; and
- a process for problem resolution.

²⁵ *Arrangement between the Governor-General and the Governor of the State of South Australia for a Joint Electoral Roll in Respect of South Australia*, 20 August 1997, Clause 10.

3.37 When the roll was updated with regular habitation reviews, there were common national standards for gathering information and enrolling eligible citizens. CRU has developed with different data standards used for different States and Territories. The ANAO acknowledges that CRU is still being developed but considers that the risk of loss of consistency of approach needs to be identified and managed by the AEC at the strategic level. Agreements at State and Territory HO level could provide the framework for the implementation of national standards and for more cooperative and effective working relationships between key stakeholders.

Relationships with local government

3.38 The audit noted a similar need to restate principles and to establish consistent cooperative relations with local government. The roll is used to administer local government elections and to do this it must accurately identify which electors are located within local government boundaries and within internal ward or precinct boundaries. Divisional Offices are required to check addresses on enrolment forms against local government records and maps. During fieldwork, the ANAO was told by AEC staff that a number of local councils refuse or are unwilling to provide information to Divisional Offices. Whilst State AEC HOs provide advocacy where problems persist there appears to be no national level, strategic management of this matter by the AEC.

3.39 The audit found the AEC does not participate in discussion or negotiation with local government at the national level. The ANAO identified four entry points the AEC could pursue to open communication channels and strengthen its relationships with local government. At the CO level, the AEC could coordinate its information and discussion with the National Office of Local Government in the Department of Transport and Regional Service and the Australian Local Government Association. At State and Territory level, dialogue could be opened with Departments within each State and Territory that have policy and financing authority over local government; and with State and Territory Local Government Associations.

3.40 The ANAO considers the AEC needs to develop an effective strategic approach to managing relationships with local government and promoting the different services and expertise provided to local government by the AEC.

3.41 The ANAO suggests that the AEC should pursue strategic relationships with local government utilising the contact points mentioned above and ensuring coordination of the efforts of CO, HOs and Divisional Offices.

Relationships with Parliament and the JSCEM

3.42 The audit noted that the relationship between the AEC and its Parliamentary Committee, the JSCEM, is one of great importance to both the AEC and Parliament.

3.43 The JSCEM provides parliamentary oversight of electoral matters, and makes recommendations to the Parliament concerning the conduct of elections and the electoral roll. The AEC needs a confident and open working relationship with the JSCEM. In the ANAO's view it is timely for the AEC to seek feedback from the JSCEM, and to consider a review of its approach to management of this vital strategic relationship.

Giving priority to strategic relationships

3.44 The AEC Corporate Plan makes little reference to the strategic relationships discussed in this chapter. One of the six themes of the AEC Strategic Plan 2001–2004 is *managing relationships with our customers and stakeholders*. None of the strategies identified for planning and implementation over the period of the plan refers to its relations with key AEC stakeholders.

3.45 The ANAO considers that the AEC should give priority to consultation with its key stakeholders, to obtain feedback with which to revitalise the planning and management of this area of its administration.

Recommendation No.7

3.46 To improve and strengthen its relationships with key stakeholders, the ANAO recommends that the AEC give priority to consultation with, and obtaining feedback from, key stakeholders; and that it develop appropriate strategies and procedures for conducting, managing and reporting on these relationships through its corporate planning and performance reporting frameworks.

AEC Response

3.47 The AEC agrees with the recommendation. It noted that its relationship with State and Territory electoral bodies is maintained by regular consultation through the Electoral Council of Australia and regular meetings under Joint Roll Arrangements. The AEC proposes to hold customer/stakeholder workshops to obtain feedback on its performance as a service provider.

4. Analysis of Roll Integrity

This chapter presents the findings of the ANAO review, analysis and independent testing of the integrity of the electoral roll, and explores areas where the AEC could further improve management of the roll.

Introduction

4.1 An objective of the audit was to form an opinion on the integrity of the electoral roll. The ANAO defined the integrity of the electoral roll as having four elements:

- accuracy—the electoral roll contains correct and up-to-date information relating to individuals;
- completeness—the electoral roll includes all individuals that are eligible to enrol;
- validity—the electoral roll contains no-one ineligible to enrol; and
- security—the electoral roll is protected from unauthorised access and tampering.

4.2 The findings of the ANAO independent analysis of the accuracy, completeness and validity of the electoral roll are set out below. Findings relating to the security of the roll are set out in Chapter 5.

4.3 In reviewing the integrity of the roll the ANAO considered enrolment in the context of Australia’s compulsory electoral system, noting that the AEC focus is on encouraging eligible individuals to enrol.

ANAO independent testing of the roll

4.4 In order to form an opinion on its integrity, the ANAO reviewed AEC management of the roll and its effectiveness in ensuring accuracy, completeness, validity and security. The ANAO also undertook its own independent testing of the roll.

4.5 After consideration of the cost effectiveness of several options to test roll integrity, the ANAO concluded that the most cost-effective option was to undertake independent data-matching of the roll against another national Commonwealth database.

4.6 The JSCEM report had also recommended that we conduct a data-matching exercise as part of the audit.²⁶

²⁶ *ibid.*, p. xvii.

4.7 We conducted several data-matching studies that can only be carried out under the *Auditor-General Act 1997*. They were undertaken to obtain information otherwise not available to Parliament and to improve Commonwealth administration of the electoral roll. Data was examined generically with no identification or examination of individual records. All parties agreed that no administrative action would be taken against individuals as a result of the data-matching analysis.

4.8 The ANAO selected Medicare as the national database with the most complete and reliable list of Australian residents. The ANAO considered that the names on Medicare files would be more complete than those on the roll, given the incentive for people to apply for rebates on medical expenses. Medicare addresses were considered to be less reliable than the roll because most individuals only update their address with Medicare when making a claim.

4.9 The ANAO was given timely and expert assistance by the HIC which provided Medicare data tailored for effective cross-matching with the electoral roll.

ANAO testing methodology

4.10 The ANAO methodology identified four potential groups for analysis:

- those who are both on the electoral roll and enrolled in Medicare;
- those who are enrolled in Medicare but are not on the electoral roll;
- those who are on the electoral roll but not in Medicare; and
- those who are neither on the electoral roll nor in Medicare.

4.11 The primary aim of the data-matching was to match electoral roll records to Medicare records, and to identify the first group, who were both on the electoral roll and enrolled in Medicare. Confirming the match of details of those on both databases was the primary test of the accuracy of the roll.

4.12 Matching records from both databases also gauged the extent of the second and third groups above. Those enrolled in Medicare but not on the roll provided information about the completeness of the roll; those on the electoral roll but not in Medicare assisted in the analysis of the validity of roll data. Indicative information on the fourth group, not recorded on either database, was obtained by comparing the roll and Medicare data with ABS population figures.

4.13 In undertaking data-matching, the ANAO was aware of the limitations inherent in comparing the electoral roll to Medicare data. Eligibility criteria to enrol to vote are different from those required to obtain Medicare benefits.²⁷

²⁷ To enrol to vote a person must be over 17 years old, an Australian citizen or eligible British subject. Medicare benefits are available to those under 17, to Australian residents (citizens and permanent residents) and to those eligible under other provisions.

Most significantly, Medicare data contains information on Australian *residency* status rather than Australian *citizenship*. Medicare data therefore contain a significant proportion of people ineligible to enrol.

4.14 The ANAO noted other inherent limitations to data-matching including:

- errors in data resulting from mis-keying of records at either agency;
- timing differences between the two agencies in updating their records;
- persons being known by a second name or adopting a different first name;
- legal change of name, for example through marriage, not notified to agencies;
- anglicising of foreign names;
- mismatches occurring where people had the same name and date of birth; and
- the limitations of computer data-matching methodologies, particularly matching large number of records—the ANAO matched 12.6 million electoral roll records against 18.4 million Medicare records.

4.15 The ANAO adopted various strategies to overcome some of these difficulties. For example, exceptions resulting from the initial match of the roll to Medicare were matched against DIMIA citizenship records and State and Territory motor transport records where available. The AEC assisted this process by providing access to these additional data sources in their possession.

Interchange of information between AEC and HIC

4.16 From the results obtained from independent data-matching, the ANAO sees benefit in the AEC having periodic access to Medicare data. We noted that several other Commonwealth agencies already have access to this data. Medicare data could provide the AEC with a benchmark against which to measure the completeness of the electoral roll. It could also provide a cost effective means to assist the AEC to confirm the accuracy of the roll, and to isolate potential instances of invalidity.

4.17 To improve their administrative effectiveness, several Commonwealth agencies have access to electoral roll data. The ANAO believes that HIC could also benefit from access to AEC data to assist in maintaining the integrity of the Medicare database. In particular, the AEC address register could be useful to the HIC. Both agencies could leverage off each others work to improve accuracy and validity.

Accuracy

4.18 The AEC does not set targets for, nor measure or report on, the accuracy of the electoral roll. The electoral roll changes continuously. At any one time it will hold inaccurate records, where voters have recently changed address, gone overseas or died, and the AEC has not yet been advised of the change, nor identified it through CRU.

4.19 Unlike most lists of clients maintained by government agencies and private sector organisations, the electoral roll is a public document open for public inspection. Electors can readily check enrolment details and advise the AEC of errors. The public nature of the electoral roll acts as a catalyst to promote a degree of accuracy that often is missing in non-public information sources.

4.20 CRU is focussed on maintaining accurate and up-to-date enrolment information for existing electors through actively identifying incorrect enrolment information and instigating follow-up action.

The address register

4.21 As CRU is largely an address-based methodology, the AEC is heavily reliant on the accuracy of its address register.

4.22 Maintenance of the address register is the role of each AEC Divisional Office. Divisions cleanse existing data that is found to be incorrect, update data where additional information is obtained, and add new addresses from information on property developments within the Division as it becomes available.

Accuracy of the address register

4.23 The ANAO noted that where the AEC routinely matched its address register with Australia Post, Centrelink and State data, it proved to be consistently accurate and reliable. However, the AEC could not provide the ANAO with evidence that the address register was accurate or consistently up-to-date across all Divisions. HOs and Divisions advised the ANAO that they believe their address registers to have a high level of accuracy. The ANAO noted that neither HOs nor Divisional Offices undertake verification activities to confirm or quantify the level of accuracy being obtained.

4.24 The ANAO considers the address register to be a crucial component for ensuring the future effectiveness of CRU. The AEC needs to develop a methodology for measuring and monitoring of accuracy of address register data. Such a methodology might include periodic, independent verification of a sample of addresses and/or the records from targeted fieldwork or other roll review activities.

Using data to identify inaccurate enrolments

4.25 Data-matching activities with other agencies' data sets and data mining of AEC records highlight enrolments that could warrant corrective action by the AEC.

4.26 Response rates to AEC letters generated from CRU activities vary depending on the source of information used, and also across Divisions, States and Territories. The ANAO noted variations in response rates from 17 to 87 per cent.

4.27 Variability of results, gaps in data sources used for CRU (discussed in Chapter 2), and the inability of the AEC to resolve all the exceptions generated by data-matching and mining, all affect the accuracy of the roll. This was confirmed by the ANAO independent testing of the roll as shown in Table 5.

4.28 Whilst response rates to CRU activities can provide an indirect indication of AEC success in identifying inaccurate enrolments and encouraging electors to update information, CRU response rates by themselves do not provide a complete measure of the accuracy of elector information.

Accuracy of elector information

4.29 The AEC matches the roll against several external databases, for example motor transport records from Queensland and South Australia. Results obtained from these activities indicate that the roll has a high level of accuracy.

4.30 Notwithstanding the generally good results obtained by the AEC from such data-matching, the ANAO considers that more needs to be done by the AEC to objectively measure the accuracy of the roll. The AEC could develop a suite of performance indicators on the accuracy of the address register and elector information. Suitable indicators could then be used for internal management purposes to measure and report on the performance of Divisions and State HOs, and for external reporting of AEC performance, for example to joint roll partners.

Recommendation No.8

4.31 To assist in its management of the accuracy of electoral roll, the ANAO recommends that the AEC:

- develop and introduce performance indicators to measure the accuracy of the electoral roll;
- develop measurable targets for roll accuracy; and
- report those targets and indicators in its Annual Report.

AEC Response

4.32 The AEC agrees with the recommendation. The AEC has already identified the need to improve its performance indicators.

AEC independent audit of accuracy

4.33 To make targeted fieldwork more manageable, the AEC divides each Division into a number of 'walks'. Walk is the term given to a grouping of dwellings that can easily be reviewed at the same time. Walks generally contain about 200 dwellings.

4.34 To provide an objective assessment of its roll maintenance process, the AEC could undertake a statistically valid, independent and periodic audit of all habitations in a sample of walks to confirm the accuracy and completeness of enrolment information. The sample reviewed could comprise a combination of randomly selected walks as well as targeted walks covering special groups of electors such as Aboriginals, those of non-English speaking background, and youth.

4.35 The ANAO considers that a periodic audit of the accuracy and completeness of the roll would provide valuable assurance to the AEC and its stakeholders.

Recommendation No.9

1.36 To measure the accuracy of the electoral roll, the ANAO recommends that the AEC consider introducing a periodic review of a sample of the electoral roll.

AEC Response

4.37 The AEC agrees with the recommendation. The AEC will examine appropriate methodologies for conducting a periodic review of a sample of the electoral roll to provide an assessment of roll accuracy.

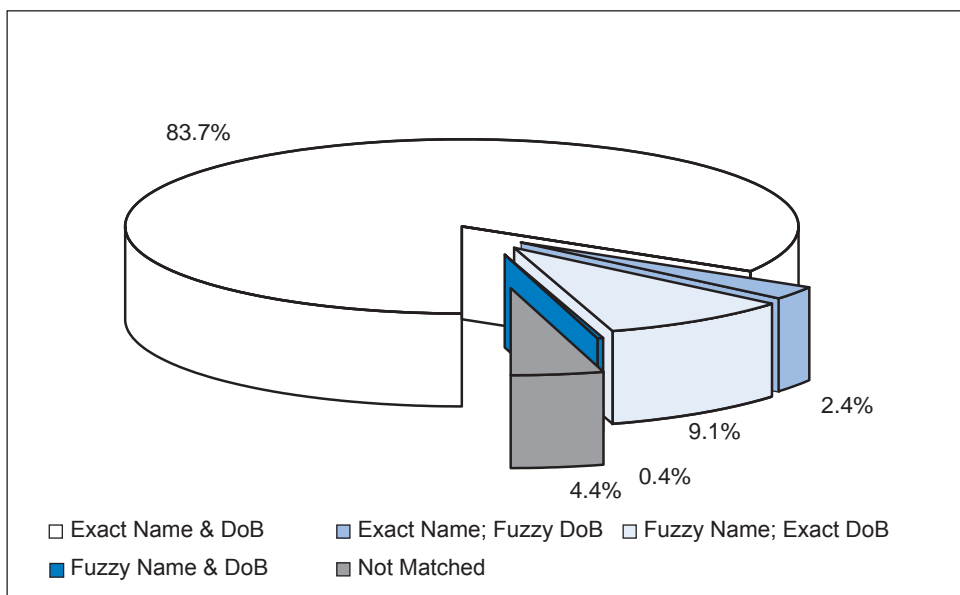
Matching the roll to Medicare data—accuracy

4.38 ANAO data-matching of the electoral roll to Medicare records was primarily a test of the accuracy of the roll. However, ANAO confirmed only the accuracy of the names and dates of birth of individuals on the roll. The matching of roll addresses with Medicare addresses was not attempted as the more uneven time frames of client transactions with Medicare meant that would be of little value.

4.39 The ANAO data-matching results matched 95.6 per cent of names and dates of birth to Medicare. As shown in Figure 3, the matching results were of a high quality, with just under 84 per cent of records matched exactly.

Figure 3

Results from Name and Date of Birth data-matching to Medicare records



Note: 'Fuzzy matching' refers to computer software that is able to search for words or dates that are similar to the name or date being searched and is used to compensate for errors in data entry and phonetics.

Source: ANAO

Enrolments matched to other databases

4.40 There are several reasons why valid enrolments might not have matched with Medicare records; these limitations were discussed at paragraph 4.14. The ANAO further refined its analysis and overcame some of these limitations by matching the unmatched records against a third data set.

4.41 The ANAO matched the remaining 4.4 per cent of the roll, over 560 000 records that were unmatched to Medicare records, against State and Territory motor transport data, where the AEC had such data available (Queensland, South Australia, the ACT and the Northern Territory). The remaining 95.6 per cent of records which had been matched to Medicare records were not matched against motor transport data.

4.42 The result of matching the unmatched electoral roll records to State motor transport data was to increase the overall number of matched records to 96.2 per cent nationally, and as high as 98.7 per cent in Queensland. A further finding from this data matching activity was that the results for all States improved slightly. This occurred because the matching process identified instances where individuals had cross-border transactions with motor transport agencies. The data matching results obtained are shown in Table 5.

4.43 As a further test, the ANAO also compared the remaining unmatched Medicare records against motor transport data. The ANAO noted that there was a significant rate of matching between motor transport and unmatched Medicare records. This suggested that the inability to match records between the roll and Medicare might largely be the result of limitations in the matching methodology rather than suspect enrolments.

4.44 The results shown by Table 5 also highlight the advantages for roll management for the AEC having access to State data, especially State motor transport data. Matching rates to Medicare were highest in those States where the AEC has had access to State data for its CRU program.

Table 5

Results from data-matching of the electoral roll to motor transport data

	Per cent of the electoral roll matched to external data	
	To Medicare	To Medicare or transport
Australia	95.56	96.20
NSW	94.92	95.09
Vic	94.83	94.97
Qld	97.02	98.76
SA	96.43	98.39
WA	96.53	96.65
Tas	96.65	96.77
ACT	96.05	98.08
NT	87.75	90.22

Source: ANAO prepared from data matching results.

Audit conclusion—accuracy

4.45 The AEC considers that its enrolment information and address register are highly accurate. The ANAO found that the AEC has procedures and controls that provide assurance on the accuracy of the roll, but that current performance information, such as CRU response rates and comparisons to external databases, can provide only incomplete confirmation of accuracy. There is a need for the AEC to develop and report appropriate performance indicators against quantified targets.

4.46 The results from ANAO independent data-matching indicated that at close of roll for the November 2001 election, the roll was over 96 per cent accurate. The remaining four per cent would require additional investigation to confirm

their accuracy. This finding confirmed the AEC claim that the roll is accurate and reliable.

Completeness

4.47 By law all eligible individuals are required to enrol to vote. The audit found that the AEC maintains a balance between encouraging enrolment in line with the requirements of legislation and with not overly intruding in the lives of individuals. As a result, it is unlikely, nor indeed feasible, that the roll will achieve 100 per cent completeness.

AEC's verification of completeness

4.48 The AEC sets a target for completeness of the roll and reports against it. The AEC outcome/output framework includes the performance target of *95 per cent of people eligible to vote are on the electoral roll*.

4.49 Measuring the completeness of the electoral roll has posed particular difficulties for the AEC, as it has never had access to a complete list of all individuals entitled to vote against which to compare the roll.

4.50 As a surrogate measure, for several years the AEC has engaged a market research firm to undertake periodic telephone surveys to determine enrolment levels. Results from these surveys have consistently reported enrolment levels around the 95 per cent target set by the AEC.

4.51 With the assistance of ABS, the ANAO reviewed the survey methodology used in these periodic surveys. We noted that the survey coverage did not include the following groups:

- residents of the Northern Territory;
- residents with unlisted telephone numbers;
- residents without telephones;
- homeless persons; and
- persons with insufficient English language skills to participate in an interview.

4.52 As there is a high risk that certain of these groups are not well represented on the roll, their exclusion from the survey would tend to bias the survey result and to overstate the completeness of the roll.

4.53 Another limitation of the AEC completeness survey is that it does not identify the missing 5 per cent (approximately 650 000 individuals) the AEC concludes are not enrolled, nor their distribution across States/Territories or

Divisions. The AEC estimates that about one-third of this five per cent comprises young people yet to enrol for the first time; around one-third is made up of a floating population of persons who have been objected off the roll and will come back on if prompted or when they settle at a more permanent address; those who refuse to enrol or avoid enrolment are estimated by the AEC to number only around one to two per cent.

4.54 Whilst noting the limitations of its survey approach, the ANAO acknowledges that the AEC has made ongoing efforts to measure the completeness of the roll. The ANAO considers that the AEC could explore the cost effectiveness of a survey methodology that addressed the gaps noted above, as part of a broader, more-comprehensive suite of performance measures for completeness.

Targeting citizens who have never enrolled

4.55 The ANAO found that CRU activities focus primarily on keeping existing electors' details accurate, to ensure that electors are on the roll at their correct address. Some components of CRU identify new enrolments, in particular youth and new citizens, and some new enrolments from older citizens result from CRU activities.

4.56 The Centrelink database is the only national database used by the AEC for cross matching. The AEC can match around 50 per cent of persons on Centrelink data with the roll. Cross matching with Centrelink data has identified approximately 2.5 million individuals not on the roll in receipt of social benefits. A significant proportion of these would be ineligible to enrol.

4.57 While a number of individuals on the Centrelink database who are not on the roll can be identified, Centrelink data is skewed to particular demographic and socio-economic groups and cannot provide a complete analysis of non-enrolment.

4.58 While routine CRU processes do identify and contact a number of citizens not on the roll, the original CRU proposal included strategies to focus on improving completeness of the roll. To date the AEC has not implemented a national CRU activity aimed at improving the completeness of the roll by identifying and contacting citizens who are not or have never been on the roll.

New citizens

4.59 New citizens are targeted through arrangements with DIMIA whereby each new citizen receives a preprinted enrolment form at citizenship ceremonies. An AEC officer usually attends each major ceremony enabling new citizens to enrol immediately.

4.60 The AEC advised the ANAO that it enrolls 90 per cent of new citizens through this initiative. Confirmation of this estimate is not undertaken by the AEC. The ANAO considers that it would be useful for the AEC to compare the number of forms issued and the number of completed enrolment forms received, and measure this against DIMIA data.

AEC follow-up activities

4.61 The AEC conducts *targeted reviews* to follow-up individuals who do not respond to letters regarding enrolment. Targeted reviews also comprise:

- reviewing enrolment of silent electors and of general postal voters;
- reviewing mail sent to electors by Senators and Members of Parliament and returned unclaimed; and
- background reviews, to confirm periodically the continuing accuracy of the 60 per cent of enrolments that do not appear to have changed.

4.62 As noted in Chapter 2, background reviews have only been undertaken in the ACT and South Australia. These reviews obtained good results and were useful in identifying individuals not enrolled. The audit noted that the AEC did not have a firm timetable for following up data across all States on citizens who had never enrolled.

4.63 One reason given for not undertaking this as a national project was that some AEOs and State Commissioners would not support the initiative in their States. As discussed previously at paragraphs 2.19–2.22, there is no strategic planning or formal communication from the AEC on this matter. The ANAO considers that not undertaking national background reviews will lead inevitably to higher rates of error and to a growing unevenness in the integrity and reliability of the roll.

Recommendation No.10

4.64 To improve the reliability and completeness of the electoral roll, the ANAO recommends that in 2002–2003 the AEC focus its enrolment efforts on the completeness aspect of the electoral roll by:

- identifying groups where non-enrolment is most prevalent; and
- developing effective strategies to improve enrolment by these groups.

AEC Response

4.65 The AEC agrees with the recommendation. The AEC advised that business plans being developed by divisional staff will include strategies for identifying areas of under-enrolment and for improving participation in these areas.

Increasing relative cost for enrolment activities

4.66 The AEC has a sequence of strategies to ensure that citizens comply with compulsory enrolment requirements.

4.67 The ANAO noted that each successive strategy is more expensive relative to the results obtained. The audit also noted that the AEC does not analyse the relative costs of its enrolment activities. The ANAO considers that this is important planning and budgetary information that should be prepared and included regularly in AEC management reports.

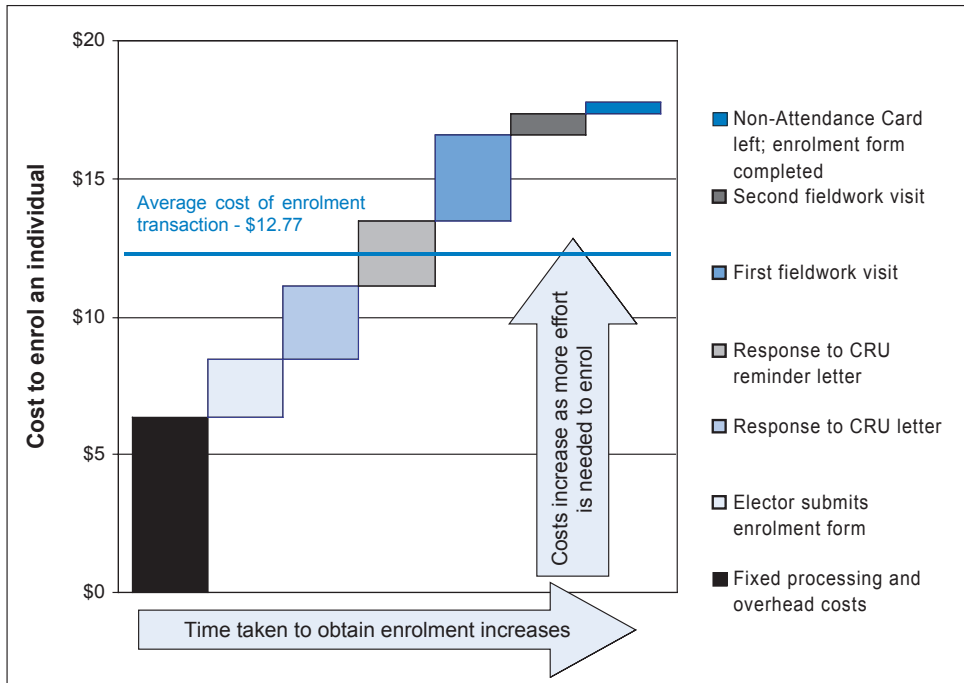
4.68 The ANAO undertook an analysis to indicate the potential cumulative cost of each enrolment strategy. The ANAO used AEC data on enrolment results for 2000–01 and on the costs of CRU activities, targeted fieldwork, educational programs, and enrolment processing activities. Figure 4 shows the indicative cost of different enrolment strategies.

4.69 The indicative cost of an enrolment transaction could be as low as \$8.46 where electors obtain enrolment forms from the post office and submit them within the time required by legislation. This amount comprises AEC overhead costs (staff, property and IT costs incurred irrespective of how an enrolment is received) and the cost of maintaining displays in post offices, printing costs for enrolment forms and postage.

4.70 However, the cost can increase significantly where the AEC has to make an increasing effort to identify and make contact with individuals to enrol them or to correct their enrolment details. The AEC can undertake an escalating series of strategies with an indicative cumulative cost of \$17.35, as shown in Figure 4, without obtaining an enrolment form from the eligible person.

Figure 4

Estimated cumulative cost of enrolling an individual



Source: ANAO developed from AEC data.

4.71 The vast majority of individuals comply voluntarily with legislative requirements with little or no intervention by the AEC. For most individuals, AEC strategies that comprise educational activities and sending individuals letters inviting them to update their enrolments are adequate.

4.72 A small proportion of individuals require a more concerted response from the AEC. This might include reminder letters or, in cases of continued failure to respond to AEC letters, visits by AEC field staff. The graduated response approach of the AEC is designed to ensure that the action taken is the most appropriate for the individual circumstance.

Use of penalties

4.73 At the last resort there are penalties in the *CE Act* for individuals who refuse to enrol.

4.74 Where a person on the roll fails to vote, an automatic fine can be issued if the elector does not provide a valid reason. By contrast, failure to enrol requires the AEC to take action through the court system. Very few such actions are pursued by the AEC.

4.75 The ANAO was advised that few prosecutions are commenced because of a high risk of prosecution action being aborted. As a result Divisional Offices are reluctant to invest time and resources in prosecuting individuals who fail to enrol.

4.76 The AEC 2001 federal election website gave the following information:

Where a person may have overlooked the responsibility to enrol and vote, the AEC's main interest is to ensure that eligible people do actually enrol ...

... once a person gives the AEC a completed enrolment form, we cannot prosecute the person for not enrolling before, no matter how long he or she has technically been in breach of the law.²⁸

4.77 The ANAO acknowledges the difficulties for the AEC in pursuing these prosecutions but considers that failure to act on instances of persistent failure to enrol might, over time, erode the AEC's authority and credibility.

4.78 The present lack of accurate information on the numbers of individuals who persistently refuse to enrol, hampers the development of an effective policy to address completeness of the roll. The ANAO considers that the AEC enrolment activities could be refined to identify where non-enrolment is most prevalent, geographically and demographically, and to identify reasons why individuals do not enrol. This would enable enrolment information and education to be better targeted and remedial action made more appropriate. For example, if the number of recalcitrant individuals was significant, there could be justification for replacing court action with a more efficient infringement system.

Matching the roll to Medicare data—completeness

4.79 The ANAO sought to derive an indication of the completeness of the roll using Medicare data. As Medicare records Australian residency rather than citizenship it was necessary for the ANAO to derive a notional figure for the number of potential Australian citizens.²⁹ This was done by:

- obtaining the number of Medicare clients having the 'Australian resident' enrolment code;
- removing identified deaths from the Medicare data; and
- removing the estimated 940 000 non-citizens that are eligible to take out citizenship but have not.³⁰

²⁸ AEC website address <http://www.aec.gov.au/election2001/faq/general.htm>, as at 15 October 2001.

²⁹ ANAO asked the ABS for information on the number of Australian citizens and was informed that the ABS also only compiles information on the basis of Australian *residency*.

³⁰ Figure quoted at the DIMIA website; www.citizenship.gov.au/citizens50/stats.htm.

4.80 The ANAO realised that the resulting figure would still contain a proportion of Australian residents that were ineligible for citizenship but considered this residual group would be relatively small.

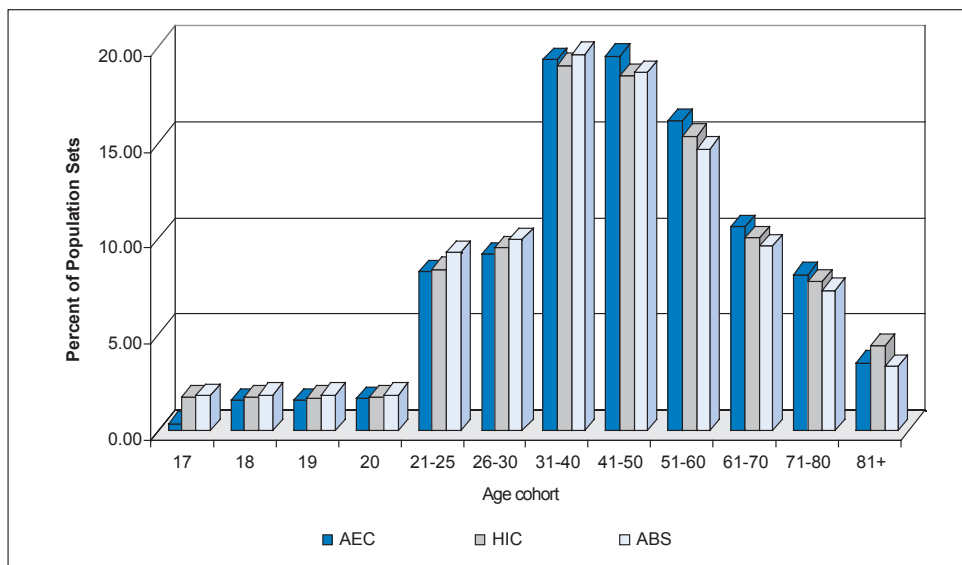
4.81 ANAO analysis indicated that at close of roll for the November federal election, the roll was 95.1 per cent complete. This result was consistent with the AEC target of 95 per cent completeness.

4.82 The ANAO sought to further identify which age cohorts were under represented on the roll. This was achieved by comparing the proportion of three population sets, the AEC electoral roll, HIC client database and ABS population estimates across each age cohort over age 17.

4.83 The results of this analysis are shown in Figure 5. The roll shows greater proportional under-representation of lower age cohorts than the other two data sets. This results in the AEC appearing to be over-represented proportionally in the higher age cohorts.

Figure 5

Comparison of the electoral roll, Medicare enrolments and ABS population estimates



Source: ANAO prepared from AEC, HIC and ABS data.

Audit conclusion—completeness

4.84 While it is unlikely that the electoral roll will ever achieve 100 per cent completeness, the ANAO considers that there is scope for the AEC to improve further the completeness of the roll; to identify the areas of significant levels of

non-enrolment; and develop more effective strategies to encourage enrolments in under-represented groups.

4.85 The results from the ANAO independent data-matching indicated that, at close of roll for the 2001 federal election, the AEC had met its target of 95 per cent completeness.

Validity

4.86 For an enrolment to be valid the individual submitting the enrolment form must meet the qualifications for enrolment, that is, he or she must:

- have attained at least 17 years of age; and
- be an Australian citizen or an eligible British subject; and
- have lived in the Division for at least one month.³¹

4.87 The AEC does not set performance targets for validity of enrolments although its procedures are explicitly designed to ensure that all enrolments are valid.

AEC enrolment checking procedures

4.88 The AEC mainly relies on its enrolment checking procedures to ensure the validity of enrolments. These procedures were outlined in Chapter 2.

4.89 In addition to standard enrolment checking procedures, the AEC can verify important parts of enrolment information using data contained in its own address register and history files, and through data-matching activities.

The address register

4.90 Under CRU the focus of AEC enrolment activities moved from being elector-based to address-based. The AEC maintains an address register that aims to include every address in Australia for which an elector can validly enrol. Enrolments are recorded against valid and habitable addresses on the address register. Individuals who try to enrol at addresses not on the address register, or unlikely addresses such as factories, shops or office buildings, will trigger investigative action by AEC staff.

4.91 Enrolment limits placed on addresses also provide a mechanism for identifying unusual enrolments. Attempts to enrol a number of individuals at one address, if not detected when the enrolment forms are processed, are likely

³¹ The *CE Act*, s.99(5) also states that the validity of an enrolment shall not be questioned on the ground that the individual enrolled has not lived in the Division for a period of one month. Therefore the emphasis of AEC enrolment checking procedures are focussed on the questions of age and citizenship.

to be highlighted during routine CRU data mining activities and will be investigated.

Non-current files

4.92 In addition to current enrolment details, AEC systems contain historical enrolment information such as previous addresses and changes of name of electors. The AEC also retains records for electors removed from the roll through objection action and for deceased electors. This data can identify attempts to enrol using the names of deceased individuals.

Imaged enrolment forms

4.93 Although original enrolment forms are not kept, once processed, each form is scanned and retained as a digital image. Divisional staff can retrieve imaged forms to confirm details in subsequent enrolment applications, for example, to compare the signature or date of birth.

4.94 The ANAO noted that such validation (in addition to the normal checks of completeness, witnessing, age and citizenship) only occurs if triggered by some anomaly in the application noticed by AEC staff.

CRU data-matching as a validity check

4.95 Under CRU, data-matching identifies differences between the electoral roll and other agency data. Electors often provide information on their change of address or name to another agency before they inform the AEC. Information from data-matching enables the AEC to initiate contact with these electors, in order to update their enrolment information or to gain confirmation that the existing enrolment is correct.

4.96 For example, during the audit, the AEC obtained data from the DIMIA citizenship database comprising the names of all persons granted citizenship since 1946 and matched this data against the electoral roll. At the completion of the audit, this project was still under way with the AEC updating elector information to include a citizenship number where this previously had not been recorded on the roll. To date this process has confirmed a high level of validity.

Fraudulent enrolments

4.97 An individual who is invalidly enrolled and who votes at an election could be committing fraud.³² Division 137 of the *Criminal Code* contains penalties of up to 12 months imprisonment for providing false or misleading information.

³² Not every invalid enrolment might be fraudulent. For example, migrants with permanent resident status might mistakenly believe that they were entitled to vote after living in Australia for many years.

4.98 The 2001 JSCEM inquiry into the integrity of the electoral roll was primarily interested in the validity of enrolments. It examined instances where identity fraud³³ was used in electoral enrolment, in particular where:

- a fictitious identity was created and used to enrol; and
- individuals used the details of genuine electors.

4.99 Based on its review of AEC's procedures, and the findings of the JSCEM's recent report,³⁴ the ANAO considers the AEC's policies and procedures are adequate to detect the majority of attempts at electoral fraud. The ANAO noted that recent fraudulent enrolments in Queensland, the subject of the Shepherdson Inquiry, were all detected by Divisional Office staff during routine AEC enrolment procedures. Notwithstanding this, no system can be guaranteed free of fraud and any additional measures to detect and prevent fraud would need to be practical and cost effective.

4.100 Although the JSCEM 2001 inquiry found no definite examples of electoral fraud, the ANAO agrees with comments in the report that AEC procedures generally focus on the completeness of the enrolment form and not the veracity of the information provided:

The emphasis of the *General enrolment manual* is on voters being correctly enrolled. As a result, it does not specifically define fraudulent enrolment, but it does provide information about what to do if an enrolment form is defective or is not properly witnessed.³⁵

4.101 The JSCEM report made several recommendations to tighten the control environment for enrolment, including changing witnessing provisions and closing the rolls earlier, prior to an election. The Government responded to the report on 4 October 2001, supporting several of these recommendations.

Fraud control plan

4.102 The AEC has implemented a fraud control plan for 2000–2002. The ANAO reviewed the plan as it applies to the electoral roll. The plan ranks the risk of fraud to the electoral roll as low for the AEC as a whole, but high for Divisional Offices where processing of electoral forms occurs.

4.103 The ANAO considers the AEC's fraud control plan provides a reasonable assessment of the risks, and that the AEC has assessed the risks of enrolment fraud occurring and taken appropriate action to address those risks.

³³ More generally, the issue of identity fraud was raised in ANAO Report No.37 1998–99, *Management of Tax File Numbers* and discussed in the House of Representatives Standing Committee on Economics, Finance and Public Administration report, *Numbers on the Run*, August 2000.

³⁴ *User friendly, not abuser friendly*, Joint Select Committee on Electoral Matters, May 2001.

³⁵ *ibid.*, p. 14.

4.104 However, given the sensitivities of the Parliament and public to allegations of enrolment fraud, the ANAO sees merit in the AEC developing a fraud control plan specifically related to enrolment.

4.105 The AEC has advised that it is developing such a plan but was unable to confirm when it would be completed or implemented by the Commission.

Recommendation No.11

4.106 To minimise the risk of enrolment fraud, the ANAO recommends that the AEC give high priority to finalising and implementing its fraud control plan specific to enrolment activities.

AEC Response

4.107 The AEC agrees with the recommendation. It has already identified completion of a fraud control plan for enrolment activities as a priority for 2002–2003.

Enrolment programs in schools

4.108 In three States, South Australia, Western Australia and Tasmania, and in the ACT, the AEC contributes a small per capita amount to schools based on students enrolled at school to vote. Schools administer the enrolment of their senior students (that is, enrolment of 18 year olds and provisional enrolment of 17 year olds).

4.109 Table 6 below illustrates the improvements that can be achieved in the enrolment of young people through use of data and direct contact. States and Territories that are involved in a student enrolment program with the AEC have consistently higher participation rates than those without such programs. In Victoria, the Victorian Electoral Commission uses its own data sources and sends birthday cards to all eighteen year olds inviting them to enrol.

Table 6:**Enrolment of young people by age as a percentage of the population—at the 2001 election close of roll**

Age:	17	18	19	20	21–25
Australia	18	77	79	87	85
NSW	11	71	70	82	83
Vic	31	84	81	88	86
Qld	13	75	88	91	86
SA	18	81	84	94	89
WA	24	77	82	86	81
Tas	18	87	89	98	96
ACT	19	87	90	87	93
NT	7	53	61	75	76

Source: ANAO prepared from AEC estimates. Young people may enrol provisionally at 17 but are not eligible to vote until 18.

4.110 The ANAO views the school enrolment program as an initiative that contributes to the integrity of the roll. Enrolments administered by the school, where the applicants are known and their details can be verified, can provide the AEC with a high level of assurance of their validity. It can also encourage youth enrolment, a group identified as under-represented on the roll.

4.111 The ANAO considers that enrolments administered by schools could be used as one measure of the effectiveness of AEC electoral education in schools. The number of such enrolments could be reported in the AEC Annual Report as a performance measure of *Output Group 3.1.2 – School and community programs*.

4.112 Based on the above results in Table 6, the ANAO suggests that the AEC develop a national policy to target enrolments in schools and actively pursue the implementation of school enrolment programs in all States and Territories.

Matching the roll to Medicare data—validity

4.113 The ANAO matched 95.6 per cent of the electoral roll against Medicare records (this result was discussed under *Accuracy* in Para 4.39).

4.114 Building on this result we wished to confirm, if possible, that those records that had matched to Medicare were also valid enrolments. Although Medicare files record Australian residency rather than citizenship, the ANAO saw benefit in determining whether any matched records contained Medicare enrolment codes other than those used by the HIC to signify Australian residents.

4.115 Similarly, the ANAO wanted to identify those records where a person was on the electoral roll but not on Medicare. It was considered that these could include invalid enrolments.

Enrolments matched to Medicare Australian resident codes

4.116 For those electoral roll records matched to Medicare, the ANAO analysed the Medicare enrolment codes to identify any records not classified as *Australian resident*. For exceptions arising from this matching the ANAO requested the AEC:

- ascertain whether their enrolment records contained a valid citizenship number provided by the elector; or
- attempt to match the exceptions to DIMIA data to confirm citizenship.

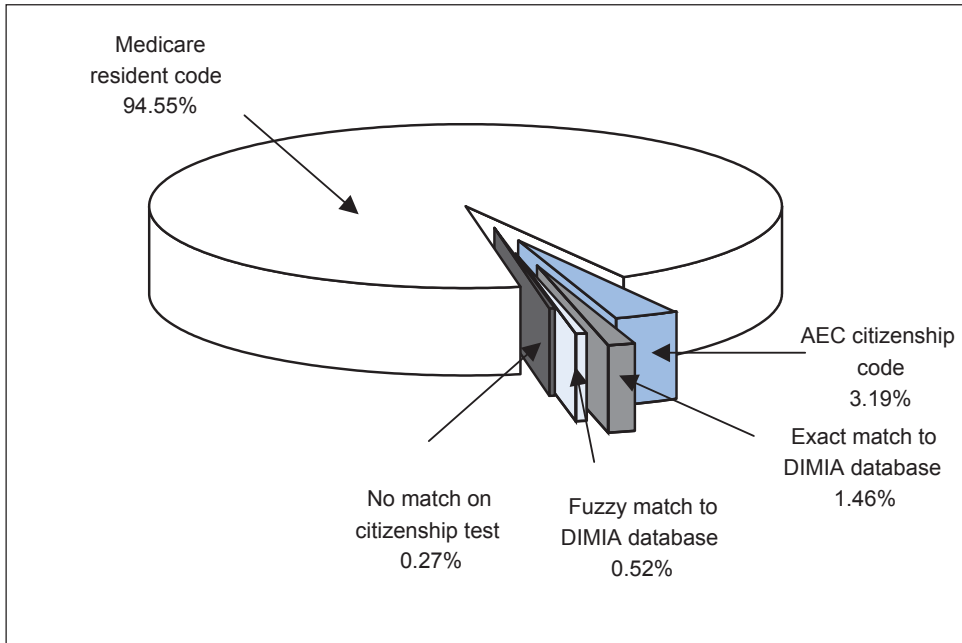
4.117 Overall, the ANAO found that just over 99.7 per cent of matched records (or 95.2 per cent of the roll) could be confirmed to Medicare *Australian resident* codes, by the AEC having a citizenship number recorded or through further matching to DIMIA data; this result is shown by Figure 6. This finding indicated that less than 0.3 per cent of matched records would require additional investigation to confirm their validity.

4.118 In an attempt to ascertain the true nature of the remaining 0.3 per cent of records where Australian residency or citizenship could not be confirmed through data-matching, the ANAO undertook further analysis of a random sample of 100 records. The analysis involved attempting to manually match exception records against DIMIA data.

4.119 We found 41 records were in the DIMIA data; most of them were names made up of two or three words that were ordered differently in each data set. The data-matching program could not match the varied order of their names. A further five records were found to be eligible British subject electors. Of the sample remaining unresolved, the majority were female electors. Verifying citizenship of women can pose particular difficulties because of name changes through marriage after taking citizenship.

Figure 6

Proportion of matched records where Australian residency or citizenship was confirmed



Source: ANAO developed from Medicare, AEC and DIMIA data.

Enrolments matched to closed Medicare records

4.120 It was not possible to determine whether there were invalid enrolments in the 4.4 per cent of the roll that was not matched to Medicare records. There have been instances in the past of the enrolment of invented names such as Michael Ratton³⁶ and Curacao Fischer Catt.³⁷ This type of invalid enrolment would most likely be located in the 4.4 per cent unmatched to Medicare.

4.121 However, the data-matching did identify 7 778 records on the electoral roll where the Medicare record had been closed. HIC advised that it usually closes a record if the person dies or leaves Australia permanently, both situations that would normally lead to the AEC to remove such persons from the roll.

4.122 Further analysis by the ANAO found that 5 747 of the 7 778 registered a vote at the November 2001 federal election. It was not practical to follow up the reasons why each of 7 778 files had been closed on Medicare but were still active on the roll. However, the ANAO did undertake further investigations on a sample of these records where the person had voted at the 2001 federal election.

³⁶ Transcript of JSCEM hearing on 2 March 2001. Hansard p. EM484.

³⁷ Transcript of JSCEM hearing on 15 November 2000. Hansard p. EM31.

This sample comprised all records where further information confirming death (from historical Fact of Death information or subsequent death deletion by the AEC) was available; this sample comprised 48 records. A further 25 closed Medicare records were also investigated.

4.123 The ANAO found that, of the electors where death was confirmed from other sources, 37 of the 48 records could be resolved for various reasons including:

- mismatching of data for electors with the same or similar name and date of birth;
- errors made by polling officials in marking off the wrong person on polling day;
- spurious marks on Certified Lists picked up during the scanning process,³⁸ and
- examples where electors had cast valid pre-poll votes but had subsequently died before polling day.

4.124 For the remaining 11 records, and the majority of the other closed HIC records reviewed (21 out of 25 records), resolution could not be achieved because of the limitations of the data available to the ANAO. Notwithstanding this, the ANAO concludes from its analysis that the majority of these exceptions could be resolved through further, more detailed investigations by the AEC if it had access to Medicare data.

4.125 Data-matching the roll to Medicare was undertaken by the ANAO as part of the audit. The AEC does not have access to Medicare data and so was unable to identify, investigate or take any administrative follow-up of the exceptions identified by the ANAO. We suggested (Para.4.16) that the AEC be given periodic access to Medicare data. If the AEC is provided with access to Medicare, we suggest that it gives priority to identifying and further analysing validity exceptions. If its analysis identifies a potential fraudulent enrolment, the ANAO considers that the AEC should hand this information to the Australian Federal Police for possible investigation.

Audit conclusion—validity

4.126 The ANAO considered from its review of AEC procedures to ensure the validity of enrolments that those procedures are generally effective and provide assurance as to the validity of the roll. Data-matching by the ANAO confirmed this conclusion.

³⁸ Certified Lists are the lists used to record that an elector has voted on polling day. After the election these lists are scanned to provide data on non-voters and potential multiple voters.

5. Security of, and Access to, the Electoral Roll

This chapter reviews the security of, and external access to the electoral roll. It examines both internal and external security of the roll. It outlines access regulated by the Commonwealth Electoral Act, that includes public access, sale of the roll, access by Commonwealth agencies, and by Members, Senators and political parties. Access by States and Territories is also considered. It concludes with a summary of legislative matters, identified during the audit, which constrain AEC capacity to administer the roll effectively.

Security of the electoral roll

5.1 The electoral roll is essential for the conduct of free and fair elections. As such it forms part of the foundation for ensuring that Australia's democratic form of government functions effectively. Its security is a high priority of the AEC.

5.2 The Commonwealth Protective Security Manual states that:

While all official information has a utility value, some of this information is especially valuable to the Commonwealth because it is critical to the performance of government functions or because the consequences of its compromise or misuse would adversely affect the Commonwealth, the Government, the community or the individuals to whom it relates.³⁹

5.3 To fulfil its functions, the AEC collects information from electors and other sources. There is an expectation by the public that, having met their obligations under the law to provide information to the AEC, the AEC in turn will protect that information from unauthorised disclosure. There is a legitimate expectation that information contained in, and supporting, the electoral roll is a valuable official resource and that adequate security measures will be in place to protect that information.

Assessment of risks

5.4 In compliance with Commonwealth requirements the AEC has developed a risk management plan to identify and address the risks associated with its functions.

5.5 The ANAO is satisfied that, as part of its risk management plan, the AEC has assessed the risks to the security of the electoral roll and taken appropriate

³⁹ Commonwealth Protective Security Manual, 2000, p. C6.

action to address those risks. The AEC has implemented security provisions designed to prevent unauthorised access to the roll. The audit found that internal AEC procedures to ensure roll security and to prevent tampering with roll data were robust and effective.

Internal security

5.6 An important aspect of information protection is effective restriction on unauthorised access to, and tampering with, information by agency staff. Agencies are required to ensure that the dissemination of information is no wider than is needed for the efficient conduct of the business at hand.⁴⁰ This is commonly referred to as the *need to know* principle.

5.7 The AEC relies on a hierarchy of system controls for its security arrangements for the electoral roll. Within the RMANS system for example, staff can access the AEC mainframe computer, the electoral roll database and specific computer applications.

5.8 Access to data categories and the ability to add, delete and change enrolment details is regulated according to each staff position and responsibility, staff can access only those activities for which they are authorised. The AEC has developed training packages on privacy legislation and IT privacy principles to ensure that staff understand their requirements.

5.9 The ANAO found AEC internal security controls to be effective.

External security

5.10 The Defence Signals Directorate (DSD) provides advice and assistance to agencies that hold information requiring protection from unauthorised disclosure or manipulation. The Australian Security and Intelligence Organisation (ASIO) provides similar advice and assistance to agencies on physical security issues.

5.11 AEC computer systems are outsourced and security provisions are contained in the contract between the AEC and its system provider. These security provisions are accredited by DSD.

5.12 AEC systems have a suite of industry standard security provisions. There is only the one entry point onto AEC systems and access is protected by a firewall that is DSD accredited and subject to regular review. The physical security of the mainframe computer on which AEC systems reside has recently been reviewed by the ASIO and found to be satisfactory.

⁴⁰ *ibid.*, p. C9.

Access to the electoral roll

5.13 Enrolment requires citizens to provide personal information to the AEC for inclusion on the electoral roll, which is then available for public inspection. The AEC is also authorised to provide access to electoral information to a range of external users. It sells printed copies of the roll, provides electronic and microfiche copies to prescribed government agencies, to approved medical researchers and health screening programs, to Members of Parliament, Senators and registered political parties, and to Joint Roll partners.

5.14 The ANAO noted a statement by the Privacy Commissioner that:

Citizens should be able to go about their lives and participate in every day social and economic activity confident that, in the normal course of events, agencies and organisations will only collect, use or disclose personal information in ways that they would expect or to which they have agreed.⁴¹

5.15 Privacy legislation permits information obtained by agencies to be used for the purposes required or authorised by law.

Public access to the electoral roll

5.16 Public access to the electoral roll enables individuals to check the accuracy of their own enrolment details, to check the correctness of the enrolment of other electors, and in so doing, to prevent electoral fraud. It provides for a transparent electoral system with a checking mechanism by the community.

5.17 Section 90 of the *CE Act* requires that copies of the latest printout, and the latest microfiche of the electoral roll for each Division be available for public inspection without fee at the Divisional Office at any time during ordinary office hours. AEC State HOs are required to keep the latest microfiche of the electoral roll for each State and Territory available, during ordinary office hours and without fee, for inspection by members of the public.

5.18 The public roll is an alphabetic list of the names and addresses of all electors enrolled for that Division, except for silent electors.

Sale of the roll

5.19 Legislation provides that individuals may purchase printed copies of the roll from the AEC. They are available by Division for \$25.00 each.

5.20 The AEC has received complaints from electors who have received unsolicited mail where the electoral roll was the source of the their address.

⁴¹ The Federal Privacy Commissioner's Submission to the *House of Representatives Standing Committee on Legal and Constitutional Affairs Inquiry into the Privacy Amendment (Private Sector) Bill 2000*, p. 2.

The AEC has expressed concern over the practice of using the electoral roll for commercial purposes but pointed out that it is powerless to stop such practices. Anecdotal evidence provided to the AEC suggests that copies of the roll are purchased, keyed or scanned into electronic format, and then sold to commercial users.⁴² Currently, there appears to be a gap in the *CE Act* in that, while there are end-use restrictions on electronic copies of the electoral roll, there are none on print and microfiche copies.

5.21 There is a risk that commercial use of information provided by citizens to meet their electoral responsibilities could bring the electoral administration into disrepute with electors and that citizens might not enrol in order to protect their privacy.

5.22 While the *CE Act* prohibits disclosure or commercial use of the roll and stipulates penalties for so doing, a successful prosecution would require the AEC to be able to trace the source of such disclosure or illegal use, and to know with certainty the name of the person responsible.

Access by Commonwealth agencies to the electoral roll

5.23 Twenty-one Commonwealth agencies have access to electoral roll data. They receive data from the current public roll as well as information on the gender and date of birth of electors.

5.24 Schedule 2 of the *Electoral and Referendum Regulations 1940* (the *Regulations*) lists these agencies and the permitted purposes for which they can use roll data. Fourteen agencies can receive electronic copies of roll data, the others receive microfiche. The agencies that receive roll data are listed at Appendix 3.

5.25 The *CE Act* restricts the use of electronic roll data to *permitted purposes* specified in the *Regulations*. A schedule specifies the purposes for which the roll data may be used by each of the fourteen agencies that have access to the roll in electronic format. They include law enforcement and criminal investigation, debt recovery, protection of Commonwealth revenue and verification of identity of clients.

5.26 The *Regulations* also permit use of electronic roll data for medical research in accordance with guidelines of the National Health and Medical Research Council, and for public health screening approved by the Department of Health and Aged Care. Certain research projects may obtain access to more detailed roll data and from AEC archives if it is required for their specific research.

⁴² AEC Submission to the House of Representatives Standing Committee on Legal and Constitutional Affairs on the Privacy Amendment (Private Sector) Bill 2000, 12 May 2000.

Access by Members, Senators and political parties

5.27 The AEC maintains and updates the data on the public roll, as well as managing the considerable amount of data that lies behind the public roll, and archival material.

5.28 In 2000 the *CE Act* was amended to enable Members, Senators and political parties to receive a range of data from the roll as well as a range of background data not available the public, nor to Government agencies.

5.29 Under these amendments, the AEC supplies Members, Senators and political parties with much of the background data behind the public roll, data specifically derived from its archives, data supplied by electors, and by other agencies, such as ABS and Australia Post, as well as State data. A full list of the information provided is in Appendix 2.

5.30 Members and Senators are provided with this material in electronic format, updated monthly. Members receive data covering the Division they represent and Senators receive data for their State or Territory. In addition, the AEC is required to provide each registered political party⁴³ with a copy of the latest print of the roll and habitation index for each State and Territory in which the party is organised. This material is provided free of charge.

5.31 The purposes specified in the *CE Act* for which roll data may be used by Members, Senators and political parties includes research regarding electoral matters. The Act does not define research regarding electoral matters.

5.32 The ANAO understands that electoral data can be re-sorted, copied and combined with other sources of data to create a profile of a person or a group of people to assist parties to target them with electoral information. Unlike the data provided to Commonwealth agencies, it does not have reciprocal accountability requirements nor specific restrictions on end-use. Members, Senators and political parties do not report on their use of the data, on whether the data is distributed to third parties, or, on any requirements on third parties, if any, to secure it or limit its use. In the ANAO's view the absence of end use restrictions on data from the electoral roll could increase the potential for electoral fraud.

5.33 The ANAO considers that provision of this degree of information to political parties has additional risks, in that it is available to any federally registered party.⁴⁴ This could include a federally registered party that did not participate in federal elections.

⁴³ The *CE Act* defines a political party as having at least 500 members; and established on the basis of a written constitution that sets out the aims of the party.

⁴⁴ AEC *Annual Report 2000–2001*, lists nine federally registered political parties that received roll data in that year. Of these, five were represented in the Commonwealth Parliament.

5.34 Political parties are private organisations and not subject to privacy requirements that apply to public sector agencies. The ANAO noted that political parties (and their contractors and sub-contractors) have been exempted from the privacy requirements applying to the private sector under privacy legislation covering the private sector.

5.35 The Privacy Commissioner noted⁴⁵ that this exemption places political parties in a special position, giving people no right to see information held on them by a political party, nor to correct any such information that was incorrect. He observed that political parties could use personal information for any purpose they chose, including selling it for a commercial purpose, and without the need to notify or get the consent of the people whose personal information it is.

5.36 Any decision to include end-use restrictions on electoral roll data provided to Members, Senators and political parties is a matter for the Government and Parliament.

Access by States and Territories to the electoral roll

5.37 The ANAO was informed that States and Territories also supply data from their rolls to external parties. Under the Joint Roll Arrangements most State and Territory electoral rolls are updated by the AEC, which provides an electronic copy to the relevant electoral authority. Although they form part of the joint roll, State and Territory electoral rolls do not belong to the Commonwealth. States and Territories determine how they will be used. Use of data from State and Territory computer copies of the joint roll is outside the control of the AEC.

5.38 The AEC was unable to readily advise on the extent of data provided to external users by State and Territory electoral authorities. The ANAO considers this an important issue to be addressed by the AEC, and suggests that arrangements to ensure transparency be developed in strategic liaison with States and Territories and be included in revised Joint Roll Arrangements.

5.39 The AEC does provide some information from State and Territory rolls to Members, Senators and political parties, that is, information on persons not entitled to be enrolled as Commonwealth electors. Such electors would include those qualified to be on a State or Territory roll but not on the Commonwealth roll. The provisions of the *CE Act* appear to contain an internal inconsistency.⁴⁶

⁴⁵ op cit., p. 5.

⁴⁶ The *CE Act*, under s84, empowers the AEC to store details of State-only electors, who are not by definition Commonwealth electors, for joint roll purposes. Ss84(2) states that those details are not deemed to be part of the Commonwealth roll. Ss91AA, however, empowers the AEC to include on tapes or disks certain information in relation to each person included in the copy of the roll. That information includes whether the person is not entitled to be enrolled as a Commonwealth elector. By definition it could be argued that such persons are not part of the Commonwealth Roll.

Although this may not make the provisions legally invalid, it is desirable in the ANAO's view that the inconsistency be clarified.

Increased risk of electoral fraud

5.40 The ANAO considers that there is an important security aspect to the current levels of access provided to roll data for secondary uses. Information behind the roll is used by the AEC to verify the validity of information on enrolment forms.

5.41 Information on date of birth is an important checking tool for the AEC to verify an elector's identity. Date of birth information, previously a unique identifier, is now circulated outside the AEC, in some instances with no restrictions on end-use. In the ANAO's view this could increase the difficulty of the AEC in detecting fraudulent enrolment.

5.42 The ANAO considers that there is a case for reviewing the availability of the full date of birth. One alternative that could be considered would be to provide the year of birth only, suppressing the date and month. Information on year of birth would still allow the roll to be used for demographic and social analysis, but could reduce some of the attendant risks.

Improving accountability for access to roll data

5.43 Most electors would be unaware that personal information they have provided in order to enrol, and data about them extrapolated from AEC systems, is being provided to external users for a range of secondary purposes. Consequently, the AEC needs to ensure that it has mechanisms in place to manage this data in a way that provides transparency and accountability.

5.44 The *Privacy Act 1988* recognises the right of individuals to know when and why information concerning them is used and to whom it is disclosed. Currently the AEC provides limited public information on disclosure on enrolment forms. While this enables a degree of informed consent for those newly enrolling, the AEC has not directed the same information to those citizens already on the roll.

5.45 The AEC Annual Report 2000–2001 lists the Commonwealth agencies, medical research projects, Members, Senators, and political parties that received electoral roll data in electronic format during the year. In each case, except for that provided to Members, Senators, and political parties, the extent of data provided was detailed.

5.46 The ANAO considers that the AEC should include more complete information on its provision of enrolment data for secondary purposes on enrolment forms, and in its Annual Report or on the AEC website.

Silent enrolment

5.47 Under the *CE Act*, electors who reasonably suspect that having their address listed on the electoral roll could put their safety at risk, can apply to become silent electors. The addresses of silent electors are not divulged and do not appear on publicly available copies of the roll.

5.48 The ANAO was advised that an increasing number of people, who rather than fearing for their safety wish to ensure their privacy, are requesting, and in some cases obtaining, silent elector status.

5.49 The ANAO considers that there would be merit in reviewing and updating the requirements for silent elector status in response to increasing community concern about systematic intrusion on individual privacy. Broadening the criteria for silent elector status could provide a means to ensure that citizens, in order to protect their privacy, have an option other than refusal to enrol and to participate in the democratic process.

Computer technology and increased risks to roll security

5.50 The conversion of the roll into electronic form has increased the potential for secondary use of roll data unconnected with the primary purpose of the roll. Developments in information technology have made it easier to copy, modify, cross-match and disseminate roll data. They have made it more difficult for the AEC to prevent unauthorised access to the data.

5.51 The JSCEM, in its 1997 report on the conduct of the 1996 federal election, noted a level of concern in the community about unauthorised use and disclosure of the roll. The JSCEM recommended that 'sections 89 to 92 of the Electoral Act, concerning improper use of roll information, be reviewed to take account of developments in computer technology'.⁴⁷ The Government supported the recommendation and the AEC commenced the review. It is yet to be completed.

5.52 The ANAO considers that it would be timely for the AEC to complete the review recommended by the JSCEM, taking into account the extent of current electronic access to electoral roll data, and evaluating risks inherent in developments in computer technology.

⁴⁷ Recommendation 53, Page xxix, JSCEM *Report of the Inquiry into all Aspects of the Conduct of the 1996 Federal Election and Matters Related Thereto*, June 1997.

Recommendation No.12

5.53 To assess and to minimise risks to the integrity of the roll arising from new technology and increased access to roll data, the ANAO recommends that the AEC give priority to completion of its review of ss.89 to 92 of the *Commonwealth Electoral Act 1918*, recommended by the JSCEM, taking into account the extent of current electronic access to electoral roll data, and effectively assessing and treating the risks inherent in current developments in computer technology.

AEC Response

5.54 The AEC agrees with the recommendation. It has identified completion of this review as a priority.

Constraints imposed by legislation

5.55 The workings of the *CE Act*, in relation to the electoral roll, are of direct relevance to Parliament, as they codify the central processes and machinery that establish and regulate parliamentary representation.

5.56 During the audit the ANAO noted areas where current legislative requirements constrain the AEC's capacity to administer the electoral roll effectively, limit its ability to ensure the accuracy, completeness, validity and security of the roll, and increase the risk of error or inefficiency.

5.57 While the form of the legislation is a matter for the Government and Parliament, the AEC should consider providing advice to the responsible Minister on legislative options to enhance the efficiency of the Commission and the integrity of the electoral roll.

5.58 In this context, the key areas arising from the audit that the ANAO considers warrant review are summarised below.

5.59 Issues relating to improving accuracy, completeness and validity of the roll:

- The audit identified benefits in the AEC having periodic access to Medicare data to assist in maintaining the accuracy, completeness and validity of the roll. There could also be benefits to the HIC having access to the electoral roll to ensure accuracy and validity of its data.
- The AEC has demand powers to require provision of information on electors but no penalties or sanctions that can be invoked when such information is refused.

- There could be merit in reviewing requirements for silent elector status. Broadening the criteria for silent elector status could provide a means for citizens to protect their privacy other than by refusal to enrol.
- It could be more efficient to replace court action for individuals who persistently refuse to enrol with an infringement penalty system.

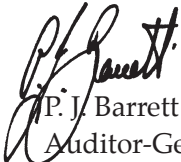
5.60 Issues relating to improving security of the roll:

- Current levels of external access to unique identifiers on the roll, such as date of birth, could increase the difficulty of the AEC in detecting fraudulent enrolment.
- Unlike the data provided to Commonwealth agencies, that provided to Members, Senators and political parties does not have reciprocal accountability requirements nor specific restrictions on end-use.
- Organisations and individuals can purchase printed copies of the public roll with no restriction on their end-use. There is an increasing risk that commercial use of roll information could bring the electoral administration into disrepute and deter citizens from enrolling in order to protect their privacy.

5.61 Issues relating to efficiency:

- The *CE Act* specifies a significant proportion of AEC staff positions. These staffing prescriptions result in a range of difficulties in managing the AEC.
- There could be advantages in automatic updating of the roll using third party data from sources where the individual's identity had been verified.
- There would be efficiencies in simplifying the objection process required to remove electors from the roll.

Canberra ACT
18 April 2002



P. J. Barrett
Auditor-General

Appendices

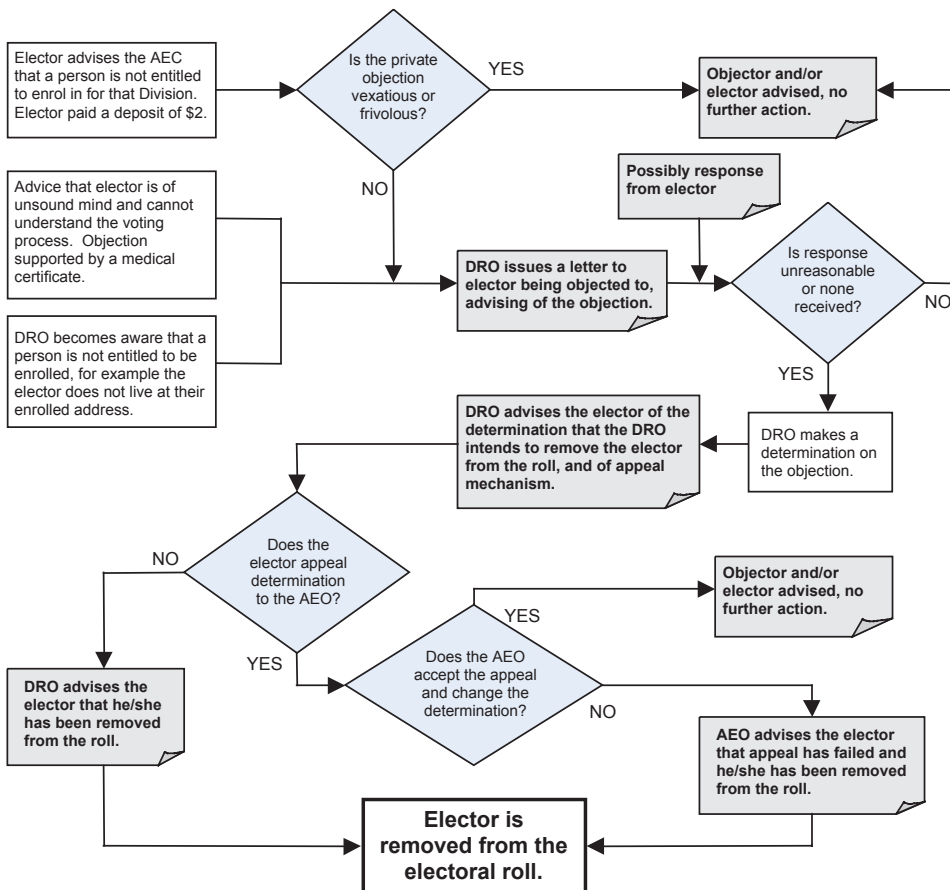
Appendix 1

Removing Electors from the Roll

Electors are removed from the electoral roll through the objection process. Objection action can be initiated:

- by DROs; if there are reasonable grounds for believing that the person is not entitled to be enrolled for that Division, usually on grounds that the elector is no longer living at his/her enrolled address;
- by an elector advising the AEC that they believe a person on the roll in his/her Division is wrongly enrolled; or
- by an objection on medical grounds; where the elector is of unsound mind or incapable of understanding the voting processes. Such an objection must be supported by a medical certificate and cannot be initiated by a DRO.

The objection process is illustrated in the following diagram.



Appendix 2

Provision of Roll Data to Political Parties

Extract for the Commonwealth Electoral Act, 1918.

Section 91 Provision of Rolls and habitation indexes to political parties etc.

91AA *Provision of additional information to political parties etc.*

- (1) If a copy on tape or disk of any Roll is provided:
 - (a) to a registered political party under paragraph 91(4A)(a) or (b); or
 - (b) to a Senator under paragraph 91(4A)(c); or
 - (c) to a member of the House of Representatives under paragraph 91(4A)(d);

the Electoral Commission may include on the tape or disk any or all of the information set out in subsection (2) in relation to each person included in the copy of the Roll.
- (2) The following information may be included in relation to a person:
 - (a) the person's postal address;
 - (b) the sex of the person;
 - (c) the person's date of birth;
 - (d) the person's salutation;
 - (e) the census district in which the person lives;
 - (f) the most recent enrolment date and enrolment transaction number for the person;
 - (g) whether the person is:
 - (i) not entitled to be enrolled as an elector of the Commonwealth; or
 - (ii) not also enrolled as a State elector, Australian Capital Territory elector or Northern Territory elector; or
 - (iii) less than 18 years old;
 - (h) whether the person is a general postal voter;
 - (i) whether the person has only recently been enrolled;
 - (j) whether the person has re-enrolled and, if so:

- (i) the Division and State or Territory in which they were previously enrolled; and
 - (ii) the enrolment transaction number for the person's previous enrolment;
 - (k) the electoral district for the purposes of State or Territory elections in which the person lives;
 - (l) the local government area in which the person lives;
 - (m) the Australia Post delivery point identifier for each address of the person.
- (3) The Electoral Commission must not include on a tape or disk any of the information set out in subsection (2) in relation to a person whose address has been excluded or deleted from a Roll under section 104.⁴⁸

⁴⁸ S.104 refers to the provisions relating to silent electors.

Appendix 3

Agencies and Departments Entitled to Receive Roll Information

Agencies that are permitted to receive electoral roll data electronically are:

- Australian Customs Service
- Australian Federal Police
- Australian Securities and Investments Commission
- Australian Taxation Office
- Centrelink
- Comsuper
- Department of Defence
- Department of Education, Science and Training
- Department of Employment and Workplace Relations
- Department of Family and Community Services
- Department of Foreign Affairs and Trade
- Department of Immigration and Multicultural and Indigenous Affairs
- Department of Veterans' Affairs
- National Crime Authority.

Agencies that are permitted to receive electoral roll data on microfiche are:

- Australia Post
- Australian Competition and Consumer Commission
- Australian Security Intelligence Organisation
- Department of Agriculture, Fisheries and Forestry
- Department of Transport and Regional Services
- Director of Public Prosecutions
- Insolvency and Trustee Service Australia.

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