



CCMG Statement on the 2020 Voter Registration Exercise

CCMG commends high adherence to registration procedures but says late communications and inadequate staff and kits hampered the process

CCMG also urges ECZ to increase the extension period, release detailed registrant information and allow an independent voter register audit

17 December 2020

The Christian Churches Monitoring Group (CCMG) through its national network of 330 trained and accredited non-partisan voter registration observers witnessed all four phases of the 2020 voter registration exercise. As part of this observation effort, 298 CCMG observers were deployed to a statistically representative random sample of 1,000 registration centres across the four voter registration phases and the sampled centres were located in every province, district and constituency of Zambia, with a further 32 observers deployed to the district registration centres, and 12 observers deployed to prisons in Phase 4.¹ In addition to their observation at designated registration centres, CCMG's observers also provided weekly reports on the general environment and stakeholder activities, as well as reports of critical incidents and violations of the Electoral Code of Conduct.²

I. Overall Assessment of the Voter Registration Process

The four planned phases of voter registration are now complete. CCMG's observers report relatively few issues with the actual registering of eligible voters and very few instances of questionable registration. However, the planned voter registration period was hampered by a lack of transparency and timely information about the process and insufficient deployment of registration teams and kits to meet demand in some areas.

In addition, the Ministry of Home Affairs (MoHA) ministerial statement³ showing uneven provincial rates for issuing new National Registration Cards (NRCs) raises questions, without further information, about new voters having an equal opportunity to register across the country. Thus, the MoHA should provide an explanation for this outcome as well as share publicly the schedule and locations where the mobile NRC issuance exercise was conducted. As CCMG observers have documented some ongoing mobile NRC issuance activities following the announced close of the exercise in Eastern, Luapula, Muchinga and Northern

¹ For the detailed methodology of CCMG's observation and sampling of registration centres, please see the full CCMG report available at ccmgzambia.org.

² For findings and recommendations related to the general voter registration environment, please see the full CCMG report available at ccmgzambia.org.

³ The 17 November ministerial statement provided targets and actual NRCs issued by province with the lowest province at 52% of targets issued NRCs and the highest at 181% of targets issued NRCs. In addition, CCMG observers have documented mobile NRC issuance activities both before and after the announced national mobile NRC issuance period, most recently in Eastern, Luapula, Muchinga and Northern provinces following the close of the mobile NRC issuance period.



Provinces, the MoHA should also publicly share where these activities are being undertaken and the reasons for it. In the interest of fairness, CCMG strongly advocates for an extension of NRC issuance exercise, especially in areas where many citizens did not access this service.

The ECZ has announced that through the four phases a total of 6,407,752 citizens have registered to vote, representing 76.1% of the eligible population. However, the quality of a voter registry is dependent upon not only the total number of registrants, but how those registrants are distributed across the country which will determine if all eligible voters had an equal opportunity to register. CCMG is not in a position to evaluate this as the ECZ has not yet released detailed information about the number and distribution of registrants, and ECZ officials did not systematically provide this information to CCMG's observers at registration centres. The ECZ should immediately release disaggregated (province, district constituency, gender and age) data on registrants for Phases 1-4, and then subsequently that from registrants in the extension period, so that stakeholders can appropriately assess the register.

CCMG is encouraged that the ECZ has determined to extend voter registration from 17 to 20 December 2020. This is a positive sign, although a more detailed explanation of its rationale for choosing to keep Phase 4 centres open in the extension, would have better informed stakeholders and the public and increased transparency of the process. Refusing to discuss an extension prior to the close of the regular period, also limited the time for communication to the public about where they could register in the extension, with the open centres for the extension period only being announced yesterday.

Whilst CCMG appreciates the decision to extend registration, we believe four days is not sufficient for the extension exercise. Poor and late communications on registration, the persistent long lines and unreasonable wait times throughout registration at some centres, the relatively few permanent registration centres and the rainy/farming season all likely reduced citizens' ability to register. Therefore, CCMG urges the ECZ to extend registration beyond the announced four days. As registration in 2016 took place as late as February for an August election, CCMG believes there is still sufficient time in the electoral calendar to extend the registration period.

In addition, to ensure the extension is a success and ultimately the voter registration process meets the expectations of all stakeholders and the public the ECZ needs to:

- 1) Significantly enhance its public outreach so that prospective registrants understand where and when extended registration will be taking place;
- 2) Ensure the number of registration teams and kits deployed at the chosen registration centres can meet the demand so that wait times are reasonable;
- 3) Provide an explanation for choosing Phase 4 centres for the extended registration period; and



- 4) Release detailed data of registrations from the first four phases by province, district, constituency and registration centre broken down by gender and age group to all stakeholders and provide an update to that data following the extension period.

Also, in those provinces where issuance of NRCs was below the national average, the MoHA should at the same time, and in coordination with the ECZ's registration schedule during the extension period, renew issuance of NRCs to ensure that all Zambians have an equal opportunity to register to vote.

Beyond the voter registration extension, in order to give the public and all stakeholders greater confidence in the process and the resulting voter register CCMG further urges ECZ to permit an independent audit of the preliminary voter register by non-partisan citizen observers.

CCMG Steering Committee Chairman Fr Cleophus Lungu noted, *“CCMG commends the ECZ for ensuring a high adherence to voter registration procedures during the recently completed voter registration exercise. However, late communications and the withholding of detailed registrant information thus far reduced the transparency of the process from what the standard was in 2015-6. Therefore, CCMG urges the ECZ to release immediately detailed registrant information by province, district, constituency and registration centre so that we and other stakeholders can assess the effectiveness of the Phases 1-4 registration effort and the rationale for registration centres chosen to participate in the extension, and for the ECZ to update that information publicly soon after the conclusion of the extension.”*

In addition, whilst CCMG is pleased that the exercise is being extended, we believe four days is insufficient, given issues experienced during registration, to ensure that all interested citizens have the ability to register. Therefore, we urge the ECZ to extend registration beyond the announced four days and believe this is achievable within the electoral calendar based on registration occurring in February in 2016 during that election cycle. And we again call on the ECZ to allow an independent audit of the voter register to build public confidence in it ahead of the election.”

II. Voter Registration Planning and Logistics

Inadequate numbers of staff and registration kits were deployed, which led to congestion in some centres, particularly in urban areas. Based on reports from CCMG's observers at a nationally representative random sample of registration centres, CCMG notes that 53% of registration centres were staffed by only one official in Phase 1, improving to 41% in Phase 4. The ECZ said it deployed 2,579 staff at the beginning of the exercise, which was not sufficient to staff each of the 2,158 - 2,293 mobile voter registration centres active per phase with two staff persons. While the additional 1,100 staff deployed for Phases 3 and 4 were an improvement, a significant number of centres in Phase 4 remained staffed by only one ECZ



official, particularly in Copperbelt and North-Western Provinces. CCMG also noted multiple instances of district-level deployment plans not aligned to the national-level deployment plan released to the public by the ECZ, which caused unnecessary confusion. An average of 13% of CCMG's observers reported centres not opening, which appeared to be primarily due to district-level deployment plans inconsistencies with the national-level plan, as well as logistical challenges.

III. Registration Adherence to Procedures

Critical materials were generally available at registration centres, and there was a high level of adherence to registration procedures with very few questionable registrations documented by CCMG observers. Based on the reports from its observers deployed to nationally representative random sample of registration centres, CCMG finds that nearly 100% of registration centres had all the critical materials with the exception of backup registration kits, which were present at 63% of registration centres. CCMG observers also documented high adherence to registration procedures, with 98% reporting that applicants showed proof of eligibility, 98% reporting that successful applicants were given a voters card with a photo, 94% reporting that registration materials were packed away safely at the end of the day at registration centres and only 8% reporting registration centres closed before 18hrs. CCMG's registration centre observers reported on multiple types of potential questionable registration or disenfranchisement; however, CCMG's observers reported that these issues affected a small number of people per registration centre (less than five people) and a small number of registration centres: at 3% of registration centres officials refused to register individuals who appeared to be eligible; at less than 1% of registration centres, there was registration of applicants who appeared underage; and at 1% of registration centres, there was registration of people without NRCs, though this affected an average of only one person per registration centre. CCMG's observers reported that at less than 1% of registration centres there was registration of applicants who appeared to be non-Zambians.

IV. Registrant Processing Time

Registrant processing time improved throughout the process, though because of continued high demand this improvement was not enough to reduce wait times and lines in some areas. CCMG's observers at a nationally representative random sample of registration centres reported improvement in the time it took to process the registration of a voter, from 10 minutes in Phase 1 to 9 minutes in Phase 4 and, correspondingly, an increase in the average number of people registered per day per centre from 67 in Phase 1 to 73 in Phase 4.⁴ Throughout the exercise, these issues do not appear to have affected significantly one region of the country more than others, based on data from observers on the average number of registrants per centre per day by province or the average minutes it took to register each person per province.

⁴ CCMG notes, however, that in 32% of registration centres ECZ officials did not provide this information to CCMG's observers.



V. Communications and Transparency

The ECZ failed to provide timely and clear information about critical aspects of the voter registration exercise to stakeholders and the general public. While CCMG commends the ECZ for releasing the national-level deployment plan for Phases 1-4, the ECZ did not do so in a timely manner. This issue persisted with the announcement of the extension of the exercise, with critical details related to the timing released only 2 days prior to and locations only released one day prior to the extension period. This is a step back in transparency and engagement with the public on the registration process, as CCMG notes that in 2015-6 the ECZ shared accreditation procedures, registration procedures and a deployment plan in a timely manner and also shared provincial-level and demographic registration data at the end of each voter registration phase. In addition, ECZ officers throughout the exercise at 32% of registration centres refused to provide information on registration to observers, including the number of registrants per day. As a government body mandated to undertake critical exercises for the good of all Zambians, the ECZ has a duty to provide timely and comprehensive information to the public and should enhance the transparency and credibility of electoral processes by sharing important information data with observers and the public.

VI. Observer Access

Throughout the voter registration exercise, CCMG documented multiple challenges with access to voter registration centres for its accredited observers. Prior to the start of the exercise, CCMG noted the failure of the ECZ to publicise the procedures for accreditation for both non-partisan observers and party representatives, and experienced a delay in the processing of its observers' accreditation. Following the launch of the exercise, CCMG continued to document that 2%⁵ of its observers were denied access to registration centres. All duly accredited observers should be granted access to any registration centre without further permissions, and the number of individuals registered at a registration centre, much like the station results on election night, should be public information.

VII. ECZ Recommendations

- a) For the extension period:
 - i) CCMG calls on ECZ to extend voter registration beyond the announced four-day period, as that is not sufficient given issues experienced during registration to ensure all interested citizens have the ability to register.
 - ii) CCMG calls on the ECZ to publicly share its deployment plans for the extension period as soon as possible, including the numbers of staff and equipment deployed by province, district and constituency.
 - iii) CCMG calls on the ECZ to ensure that staff and equipment are adequate to meet demand and have reasonable wait times.

⁵ Extensive contact by CCMG with local officials resolved 29% of these cases.



- iv) CCMG calls on the ECZ to release detailed disaggregated information on registrants from Phases 1-4 immediately so that stakeholders and the public can assess the quality of the register based on that part of the process and to assess the rationale for the centres ECZ has chosen for the extension.
 - v) CCMG calls on the ECZ to significantly enhance its public outreach so that prospective registrants understand where and when extended registration will be taking place; this must include ensuring national-level and district-level registration plans are in sync to avoid confusion.
 - vi) CCMG calls on the ECZ to coordinate closely with the Ministry of Home Affairs to allow for NRC issuance either prior to or simultaneously with voter registration in the extension areas.
- b) CCMG also makes the following recommendations to ECZ:
- i) Release all data immediately related to Phase 1-4 of voter registration so that stakeholders can assess the initial process; in addition to the details of registrants by province, district, constituency and registration centre noted above, this should include staff and kit deployment numbers and locations for each phase and original targets for each location and phase.
 - ii) Improve public communications and transparency given the lack of key information, unclear, and late communications on voter registration provided to stakeholders and the public and appoint a civil society liaison officer to facilitate civil society's requests for information.
 - iii) **Allow an independent audit**, sometimes called a voter list verification, **of the voters' register to enhance public confidence in the voter registration process and the voters' register.**
 - iv) Put in place administrative guidelines and timelines for sharing information with the public and stakeholders for future electoral processes.
 - v) Codify the right of observation for voter registration, including that of incarcerated individuals, in the ECZ's administrative policies and timelines, as well as its training of registration officers and any other officials attached to the voter registration exercise.

VIII. Ministry of Home Affairs Recommendations

- a) CCMG urges the Ministry of Home Affairs to extend the mobile NRC issuance exercise, especially in areas where many citizens did not access this service.
- b) CCMG calls on the Ministry of Home Affairs to coordinate closely with the ECZ on the extension of the mobile voter registration exercise by conducting NRC issuance activities either prior to or simultaneously with voter registration in the extension areas, especially those where the initial mobile NRC issuance exercise captured fewer targets than the national average.



- c) CCMG calls on the Ministry of Home Affairs to provide further information on the NRC mobile issuance exercise, as an NRC is required to register to vote. This information should include:
- i) An explanation for how the targets listed in the 17 November ministerial statement were devised and an explanation for the significant shortfalls and overages of those targets in some provinces.
 - ii) A detailed schedule for where and when mobile issuance of NRCs occurred both in the announced period of that exercise and outside of that announced period.
 - iii) An explanation for the ongoing mobile NRC issuance activities occurring, as documented by CCMG observers, outside of the announced end of the mobile NRC issuance exercise.
- d) CCMG urges the Ministry of Home Affairs to reconsider its decision to bar observers from mobile NRC issuance exercises, as an NRC is required for voter registration eligibility and thus the process should be considered an electoral activity that requires transparency and independent observation.

IX. Political Party and Other Non-Partisan Observers and Civil Society Organisations

Throughout the voter registration exercise, CCMG's observers reported low levels of observation by party representatives and other non-partisan observers, which reduced the ability of these critical stakeholders to comment on and provide recommendations on the voter registration exercise from an evidence base. CCMG urges political parties and non-partisan observers to train, seek accreditation and deploy observers for the extension period, the inspection of the voters register and on election day to enhance the transparency of Zambia's electoral processes.

CCMG again commends the efforts of citizens to register, especially those who had to wait in long lines and particularly the youth and first-time registrants, women and persons with disabilities. CCMG also commends the ECZ for high adherence to voter registration procedures, however CCMG calls on the ECZ to urgently implement the recommendations set forth in this statement to ensure the extension period for voter registration can improve upon the initial exercise.

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