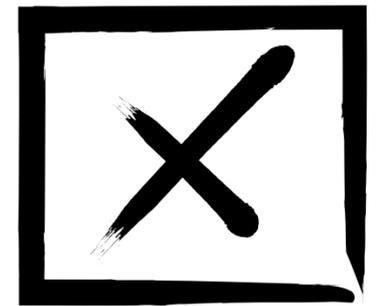


REGISTERING STUDENTS TO VOTE

A best practice guide to implementing auto-enrolment at universities





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ACADEMIC
REGISTRARS'
COUNCIL

Introduction

Who is this guide for?

This guide is for university staff with a responsibility for helping students register to vote. Depending on your structure, this may include teams that work in the Registrar's Office, Student Services, Regulations or Operations.

Although some elements of this guide – for example in relation to the Office for Students – are relevant only to English universities, much will also be useful for universities in Northern Ireland, Scotland and Wales.

Why does student voter registration matter?

Universities play a key role in engaging students in civic life, which includes registering to vote. As most students are young adults living away from home for the first time, university is a critical moment on their civic journey. Getting into the habit of registering to vote when they are young means they will be more likely to vote the rest of their life.

Universities spend a lot of time and money on voter registration. The easier they can make registration, the more they can free up resources to focus on other activities, such as encouraging turnout and providing information on voter ID.

Moreover, students are an important demographic that must have representation. Evidence shows that younger voters who rent and have lived at their address for less than a year are the least likely to be registered to vote. Students typically fit into one, or all, of these buckets and therefore support from institutions such as universities, is vital.

1 Cabinet Office, Student Electoral Registration Condition Evaluation (2021)

2 Students and Democracy: How universities help students register to vote (2023)

3 Students and Democracy: How universities help students register to vote (2023)

What is best practice?

The most effective method of registering students to vote is to provide an opt-in on enrolment forms that allows them to register automatically. (1) This is known as “auto-enrolment” or “voter registration opt-in” and is sometimes referred to as the Sheffield Model. Evidence shows it can help thousands of students at each university register to vote every year. (2)

Why was this guide created?

Although auto-enrolment is the most effective way to register students, only 1 in 3 universities in the UK offer it. A recent survey found that 61% of universities would implement auto-enrolment if there were clear guidance on how to set it up. (3) This guide was created to do just that. It gives you and your team the information needed to set up auto-enrolment quickly and easily.

There is a lot of detail in this document, but if there's one section you do read, make sure it's 'How to implement auto-enrolment' on page 6.

The Office for Students (OfS) requires universities to help students register to vote. Under Condition E5, higher education providers are expected to:

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

What is auto-enrolment?

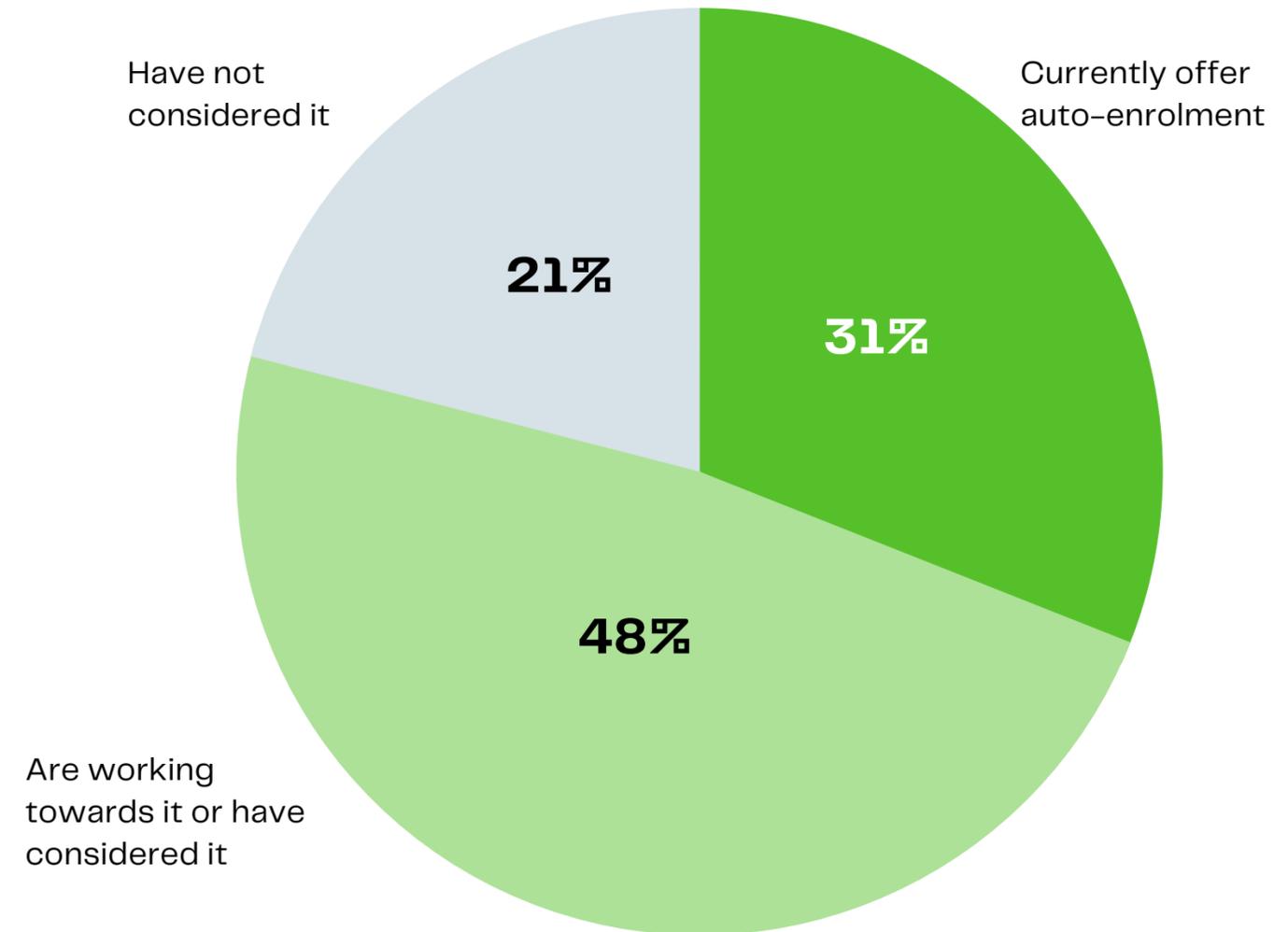
Auto-enrolment is where students register to vote through university enrolment forms. It is sometimes known as "registration opt-in" or the Sheffield Model.

When completing their enrolment form, the student is asked whether they would like to opt-in to register to vote automatically. All they need to do is provide a small amount of information and give permission for their data to be shared.

The university then shares this data with the local Electoral Registration Officer (ERO), with whom it will have a data sharing agreement.

In this way the university is effectively registering the student on their behalf. In legal terms, they are acting as a 'responsible person' which enables them to provide a student's registration data to the ERO.

Nearly 4 in 5 universities in the UK have auto-enrolment, are actively working towards it or have considered it.



Source: Students and Democracy: How universities help students register to vote (2023)

Why should I set up auto-enrolment?

It is the most effective way to register students

The University of Sheffield estimated auto-enrolment had the potential to increase student registration rates from 13% to 75%. (4)

As most students have to enrol each year, you can guarantee that everyone will be offered the chance to register to vote simply and quickly, which isn't the case for other registration activity like emails or events on campus.

It can cost nothing – you may even get paid

Far from costing universities more, some EROs actually pay them a small annual fee – generally £2–3,000 – to cover the staff time involved in implementing and maintaining auto-enrolment.

Auto-enrolment can also save councils money, as otherwise they would have to contact students directly – by post, phone or in person – to ask them to register. For a student population of 25,000, this could cost the council over £100,000 a year.

It is easier to measure impact

You can accurately record the number of students who register through enrolment, helping track progress over time and monitor the impact of any improvements to the system. It is virtually impossible to do this for other activities like emailing a link to the government registration website.

It frees up resources for other civic work

Most of the work to deliver auto-enrolment is done during the initial set up. Once it's in place, the process stays largely the same each year and is easy to maintain.

This frees up time and money to spend on other activity, such as arranging discussions before an election, inviting candidates to hustings on campus or reminding students to vote.

Get ready for the next election!

The most likely date for the next General Election is autumn 2024, although it could be sooner. Setting up auto-enrolment as soon as possible – ideally by autumn 2023 – will ensure the largest number of students can vote. If you can't manage it by 2023, aiming to have it in place for your 2024 enrolment will be just as useful.

It's not just General Elections that matter. Students can vote in local elections, giving them a stake in their community, and setting them up with regular voting habits that can last a lifetime.

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

How to implement auto-enrolment

All universities are different and exact requirements vary, so feel free to tailor these steps to suit your needs.

1. Contact your local Electoral Registration Officers (EROs)

You or a member of your team are probably already in touch with your local ERO or their team. If not, you can find the contact for your local office at www.gov.uk/contact-electoral-registration-office.

Most universities have students who live across several council areas. You may start by working with the ERO where the majority of your students live, but it is also advisable to work with other councils if you can. You can find more information about doing this on page 11.

Commuter students are more likely to be registered at their home address, but this is not a given, therefore should also be given the opportunity to register with their local ERO as part of the university promotion.

2. Hold a discussion with the ERO(s)*. Topics you may wish to include:

- What data students will need to provide**
- A data sharing agreement
- The wording of the enrolment form (see page 7 for template)
- How and when you will transfer the data. This could be by uploading it to a portal or sending in a password-protected file
- Whether the ERO can make a small payment (usually £2–3,000s) to your university in recognition of the costs incurred and potential savings the ERO will make (some unis waive this)
- Who is leading the project from both sides and a timeline

*You may find that your university includes students from multiple EROs therefore you will need to reach out and contact more than one. Please see page 11 for more details.

**The ERO may insist that all students provide a National Insurance number. While this makes the verification process quicker for the ERO, it is not essential. See the FAQs for more information.

3. Create a data sharing agreement

A link to a template data sharing agreement can be found on page 17. Your ERO may have a template they prefer to use. Make sure to find out if changes need to be made to your university's general data protection and privacy agreements.

4. Edit the enrolment form and student records

Most universities, when enrolling or re-enrolling students each year, use an online form that captures specific details about them. We recommend editing this form to include fields to enable students to register to vote at the same time. A template form can be found on page 7.

Whatever wording you choose, we recommend you make it as easy as possible to complete: keep text to a minimum, explain key points and pre-populate fields where you already have the data (like name and email address). You will likely need to work with your data/IT department and it could be worth contacting your software provider to see if they can provide a bespoke solution.

5. Add an address auto-complete

One of the most difficult aspects of auto-enrolment is getting the correct addresses. Some students simply put the name of their university or halls in the address field, rather than their actual address.

If you don't already have one, you could add an address auto-complete tool to increase accuracy. If this isn't possible, you can also supply the ERO with lists of students living in halls of residence, or at the very least the names of each block so they can check against the data.

6. Decide how you are going to measure impact

Agree with the ERO how you are going to record the numbers of students who register to help you monitor the process and make improvements in future.

Template Form Text

Here is some suggested text and fields to add into your enrolment form, which you can edit to suit your needs. The questions should be as easy as possible to complete, with text explaining key points that might be confusing and fields pre-populated with data you already hold.

Would you like to register to vote?

If you want to vote in national and local elections you need to register first. Registering to vote can also help you if you want to rent, get a mobile contract or credit card in future. If you are not sure whether you are registered to vote in [LOCAL AREA], you can still fill in this form and the council will check whether you are already on the electoral register.

You can register to vote at both your home **and** term-time addresses and you can vote in two places for local council elections. For general elections, you can only vote in one place, but you can decide whether that's at home or university.

- First name*
 - Last name*
 - Date of birth*
 - University email address*
 - Term-time address [recommend installing address autocomplete tool]
 - Nationality
 - National Insurance number ⓘ
- } Pre-populate as many of these fields as you can
*denotes a required item

- I would like to register for a postal vote
- I wish to opt in to the open register ⓘ

Do you give permission for [LOCAL COUNCIL] to contact you if they need more information?

- Yes / No

- I understand that this information will be passed to the Electoral Registration Officer of [LOCAL COUNCIL]. The Electoral Registration Officer will use this data to compile the Electoral Register. Eligibility for inclusion on the Electoral Register will be determined by the Electoral Registration Officer.

Providing your NI number is not essential but it will make your application quicker. You usually get sent your NI number when you are 16 and it can be found on things like payslips or certain Student Loans Company communications.

The open register is a version of the electoral register that can be bought by any person, company or organisation. For example it is used by businesses and charities to confirm name and address details.

The ongoing process

Once you have set up auto-enrolment, you will only need to go through a few steps each year. Here are the most likely ones.

1. Renew and update the data sharing agreement with your ERO

How often you will do this depends on the length of the agreement. Some choose to renew it annually, others every 3–4 years.

2. Send out the enrolment form

You may have agreed with the ERO to make changes to improve the process. If so, make sure to integrate them into the form.

3. Transfer the data

Once the bulk of students have enrolled, download and transfer the data to the ERO. You can make several transfers throughout the year (e.g. once a term) as more students enrol or they update their data. See page 11 for transfers to multiple EROs.

4. Measure and record the number of students registering

It's important to track numbers to help make improvements to the process and monitor impact. You may wish to include this data in reports to the senior leadership or board of governors.

5. Support the ERO with queries

Once the ERO has the data, they perform the verification process and add students to the electoral register. If they do not have enough data, for example an incomplete address, they may go back to you for more information, or contact the student directly.

6. Delete unnecessary data in accordance with data protection

It will be worth recording which students register to vote so you can follow up with emails to those who didn't register later.

7. Meet regularly with your ERO throughout the year

Good working relationships with EROs and their teams are essential for auto-enrolment. Some meet 1–2 times a year, but many do so every couple of months. However often you decide to meet, get dates in the diary as soon as you can: EROs are very busy in the run up to elections, so they may often want to avoid meeting from March–May.

8. Ask students to update their data periodically

You may find it useful to ask students to confirm their data, such as address, is still correct at different points in the year (you may already do this for other activity). You could also do this just after an election is called so that students who have moved can update their details.

“ We are implementing auto-enrolment at Nottingham this year and so far everything has been straightforward. With a general election coming up, there's a great opportunity to help students express their voice by adopting auto-enrolment.

**Stephen McAuliffe, Vice Chair of ARC and
Deputy Registrar at University of Nottingham**

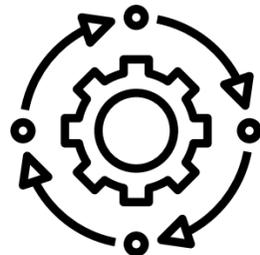
Auto-enrolment in action



Students opt-in to register to vote on enrolment form



University downloads the relevant data and sends it to the ERO



ERO process data, queries bad data with university or contacts the student directly



University deletes unnecessary data, in compliance with GDPR



University records the number who registered for monitoring and improvement



ERO sends student confirmation that they have registered



Updating your student records

Your IT or data team should be able to make the changes required to the front and back-end of your student records system. While Tribal SITS is relatively simple to adapt, other systems are more complicated and it can cost a significant amount of money. If this is the case, you may want to investigate a temporary work-around (such as asking students for a simple Yes/No opt in without options for postal votes etc) or ensuring that if there are plans to move to a new student records system in future, auto-enrolment is introduced then.



SITS can be adapted to accommodate auto-enrolment. You can use the User Defined Fields to capture the necessary data. If you use the self-service web portal, you could also consider adding the ability for students to register to vote through the portal at any time of year.



Oracle's PeopleSoft Campus Solutions can be more difficult and costly to adapt for auto-enrolment. If your data or IT team is unable to spare the resource to do so, they may be able to use a GT eForm integration instead, allowing you to create a form that collects the required information seamlessly.

Automatic Data Sorting and Transfer

Most universities download the registration data before passing it on to the relevant ERO. If sending to more than one ERO, they manually split the data up. However it may be possible to create two tools to make this process easier:

- Use an API to identify which local authority area a student lives in and therefore which ERO the data should be sent to. MapIt by MySociety provides such an API and their service can be found at: mapit.mysociety.org.
- Automatically send the data to the correct ERO via an FTP (File Transfer Protocol) which your IT team will need to set up. This will rely on the EROs routinely picking up the data after the transfer, so you'll need to make sure they do.

Advanced auto-enrolment

This section is for teams who have already implemented auto-enrolment and would like to know how to improve the system, or for those who are in the process of setting up auto-enrolment and would like to make it as effective as possible from the beginning.

Students living across multiple EROs

Many universities have students living across several council areas. Jisc previously offered a voter registration service that registered students from multiple areas, but unfortunately this service has been withdrawn.

To ensure all students can register, you could reach out to neighbouring EROs, starting with councils with the largest cohorts of students and working down from there.

There will likely be two issues that can make it more complicated than working with just one ERO:

- Different data sharing requirements and formats
- The time involved in processing and sending data to each relevant ERO

To deal with the different data requirements, ask all the EROs to use the same data sharing agreement as a template, and ask them to agree to the same data fields, formatting and transfer to make it easier to manage.

To reduce the time it takes to process and send the data, use a tool such as MapIt by MySociety. For £20 you can upload a csv file with postcode data and it will return the correct local council that addresses falls into. You can then split the data into separate CSVs, one for each different ERO. They also offer an API. The service can be found at: mapit.mysociety.org.

Ask your software provider for changes

It may be worth approaching your student records system provider to ask them to make it easier to build the forms or download data. For example they could agree to build a module specifically for student voter registration that would be available to all universities in future.

Offer registration through student portals

The restriction of auto-enrolment is that it only happens once a year. To offer multiple chances to register to vote you could allow students to do so via your student portal. If your technology allows, you could even periodically show a pop up box to students who have not yet registered, prompting them to do so when they log in to the portal.

Alternatively you could email students with a bespoke form that auto-populates their data at other times throughout the year, ensuring those who did not register during enrolment have a second prompt to do so.

To make this work, it is important to keep track of which students have already registered so you don't send unnecessary communications to them.

Include eligible international students

Some universities only offer British students the chance to register to vote. However many non-UK nationals are eligible to vote in certain elections. It is worth encouraging them to register as they may not know they have the right to vote in the UK and it could give them a stake in the local community.

Below is a summary of which residents are eligible to vote in different elections. You can find a full list of qualifying EU and Commonwealth countries and further details on the Electoral Commission [website](#). If in doubt, ask your ERO.

Who can vote in UK elections?

Election type	Voting age	British citizens	Resident Irish citizens	Resident qualifying Commonwealth citizens	Citizens of other countries
UK Parliamentary elections	18	Yes	Yes	Yes	No
England					
Police and crime commissioner	18	Yes	Yes	Yes	Resident EU citizens
Elected mayors	18	Yes	Yes	Yes	Resident EU citizens
Council and parish council	18	Yes	Yes	Yes	Resident EU citizens
Scotland					
Scottish Parliament	16	Yes	Yes	Yes	Anyone legally resident
Council and community council	16	Yes	Yes	Yes	Anyone legally resident
National parks authority	16	Yes	Yes	Yes	Anyone legally resident
Wales					
Senedd Cymru	16	Yes	Yes	Yes	Anyone legally resident
Council and community council	16	Yes	Yes	Yes	Anyone legally resident
Police and crime commissioner	18	Yes	Yes	Yes	Resident EU citizens
Northern Ireland					
Northern Ireland Assembly	18	Yes	Yes	Yes	Resident EU citizens
Council	18	Yes	Yes	Yes	Resident EU citizens

Improve the user experience

It is always worth finding ways to improve the form to make it as easy as possible for students to fill in. You may wish to test the wording on the form, or add an address autocomplete tool if you don't already have one, to see if that improves completion rate.

Support students with voter ID

Voters now need to produce ID to vote in most elections. There are a number of [acceptable forms of ID](#), such as passport or driving licence, but at the time of writing, student cards are not permitted. Students who do not have one of the accepted IDs can apply to their council for a free voter ID document.

You could discuss with your ERO whether you can offer to register students for a voter ID document on their behalf. In theory, the process should be very similar – all you'd need to do is create a form to gather the correct information and pass it on to the ERO.

Monitor impact

It is strongly recommended you record the number of students who register through auto-enrolment and other registration activities. You can then create KPIs and track improvements to the process, such as changing the wording of the enrolment form or making the user journey simpler.

Approximately 66–68% of people age 18–24 are registered to vote outside an election year. Use this as a baseline to compare the proportion of eligible students who register to vote and aim to improve the number each year.

FAQs

What does auto-enrolment cost?

Far from costing you more, some universities actually get paid a small fee from their ERO – generally £2–3,000 – for carrying out auto-enrolment, to cover the staff time involved in implementing and maintaining the process. It should be noted, however, that some universities choose not to ask for a fee and are able to cover the costs themselves.

Does it mean more work for the local council?

No. In fact, it should save them time and money. Without auto-enrolment, EROs have to contact thousands of students directly – via phone, post and in person – which is time-consuming and costly. The more students who register through auto-enrolment, the fewer students the ERO has to contact directly. For a student population of 25,000, auto-enrolment could save the council over £100,000 a year.

When is a good time to implement auto-enrolment?

As we head towards an election in 2024, auto-enrolment should be implemented as soon as possible, preferably in time for enrolment for the majority of students at the beginning of the 2023/4 academic year.

If this isn't possible, aim for 2024, but be aware that an election may be called earlier and you may want to plan to register students through student portals or email as well (see page 11). If your university enrolls at other times of the year too (e.g. January), work towards the earliest date you can.

Is auto-enrolment compliant with GDPR?

Yes. In fact, sharing data with your local ERO when asked is actually a requirement under electoral law. (6)

However, it is essential that when you collect data for auto-enrolment that you adhere to GDPR principles, these include:

- Data minimisation: Only collect the data that is necessary to carry out voter registration
- Data security: Ensure that the data is collected, processed and stored in a safe and secure manner
- Transparency and Privacy Notices: Students should be informed to how and why their data is being collected and be asked their permission
- Data retention: Data should be retained for as long as is necessary and should be securely disposed of when no longer needed

Is auto-enrolment the same as the Jisc voter registration tool?

No, they are not the same but they perform a similar function. Auto-enrolment is where registration is embedded into your enrolment forms and you work directly with your local ERO to collect and share data.

Jisc provided a tool until 2023 to register students through a separate platform, with the data automatically passed on to the correct ERO. It made it simpler to register students from multiple council areas since universities didn't need to liaise directly with them all.

FAQs

What if the ERO doesn't want to implement auto-enrolment?

EROs have a legal duty to ensure their register is as up to date as possible and most of them put a huge effort into registering students, both through the Annual Canvass (see p16) and through engaging directly with universities.

In the unlikely event that an ERO is unwilling to implement auto-enrolment, it may be worth pointing out that it could help them achieve greater impact by registering a large number of students at once. It should also save them money – over £100,000 a year for a student population of 25,000.

You may also wish to highlight other local authorities, such as Sheffield City Council, which has used auto-enrolment with both universities in Sheffield for over a decade.

Do students have to provide their National Insurance number?

No. Students do not need to provide their National Insurance number to register to vote, though it can make the verification process much easier for the ERO. If the ERO does not have their NI number, they need to use other verification methods.

We recommend that NI number is an optional field on the enrolment form in order to capture NI numbers if possible, but not put students off if they don't have their number available. If the ERO insists on it being a required field, you could point out that it will reduce the number of registrations and that it would be better for the ERO to use alternative verification methods.

What does the law say on where students can register to vote?

Students can register to vote at both their home and term-time addresses. However they can only vote more than once for certain types of elections. Students can vote at both addresses in local council and mayoral elections in England, but not in Scotland, Wales or Northern Ireland.

For UK General Elections, Scottish Parliament, Senedd, Northern Ireland Assembly and London Assembly elections, students can register in more than one place but when it comes to actually voting, they need to choose one address and vote only in that area.

What else can I do to help students register to vote?

There are many other tools that universities already use to help students register to vote, such as:

- **Raise awareness:** host a page on your website and email students with information about the importance of registering, and the fact that they may be able to register in two places
- **Collaborate:** work with your students' union and student societies to run registration campaign drives at key moments throughout the year
- **Coordinate with EROs:** pass them student university email addresses (as long as this is in your privacy statement) so they can email students directly, ask them to share information on the registration process or invite them to register students on campus



Further information and support

If you wish to find out more or have suggestions for how this guidance can be improved, please contact: Bess.Mayhew@purposeunion.com

You may find guidance, training and support from professional bodies of which you are a member or other relevant organisations, such as:

- Academic Registrars' Council
- Association of Heads of University Administration
- Association of University Administrators
- Association of University Legal Practitioners
- National Union of Students
- Student Records Officers' Conference

You could also ask colleagues in other universities who may have already implemented auto-enrolment and may be able to share information on how to go about it.

If you want to know which students should be offered the chance to register, guidance on who is eligible to vote is available on the Electoral Commission [website](#).

If you want to know what kind of data agreement your local ERO is likely to ask for, guidance from the Electoral Commission for EROs can be found on their [website](#).

Glossary of terms

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

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

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

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

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

AULP: The Association of University Legal Practitioners, open to trainee and qualified Solicitors, Barristers and Legal Executives working in Higher Education in the UK.

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

EROs: Electoral Registration Officers collect and use information about residents to enable them to carry out specific functions for which they are statutorily responsible. In practice, an ERO's duties may be carried out by appointed staff within Electoral Services Teams, so you may not always work directly with the ERO themselves. In this guidance, the term 'ERO' refers to anyone who is carrying out an ERO's duties on their behalf.

IER: Individual Electoral Registration was introduced in 2014 as a replacement for the household voter registration system. It requires each individual to register themselves to vote, rather than by another person in their household (e.g. a parent). Prior to the introduction of IER, universities had been able to register all students living in halls of residence on their behalf.

Jisc: Jisc is a not-for-profit digital, data and technology agency focused on tertiary education, research and innovation in the UK. The provided a student voter registration service until July 2023.

NI: National Insurance number

Appendix: Template Data Sharing Agreement

Below is a link to download a template data sharing agreement which can be adapted by your university and council data protection officers.

www.purposeunion.com/s/Data-Sharing-Agreement.docx

Your local ERO may also have a template they prefer to use. Make sure to find out if changes need to be made to your university's general data protection and privacy agreements.

Template Data Sharing Agreement

This document may be used by universities and Electoral Registration Officers as a basis for creating a data sharing agreement for the purpose of auto-enrolment (whereby students are able to register to vote when they enrol or re-enrol). This is a guide only so it is strongly recommended that the final document is reviewed by the relevant data protection officers in each university and local authority.

Introduction

1. Summary

1.1 The parties to this data sharing agreement

[UNIVERSITY OR HE PROVIDER NAME] (The University)

The Electoral Registration Officer of [LOCAL AUTHORITY] (The Client)

2. Background

2.1 Background to this agreement

- The Client is (by Law) responsible for collecting voter registration details of residents within the boundaries of [LOCAL AUTHORITY].
- Some of the University's students are expected to move to [LOCAL AREA] from elsewhere for the purposes of their studies. Some of these will become eligible to vote within [LOCAL AREA] as residents.
- The University expects to gather information about its students as part of the University's normal student enrolment and re-enrolment process, commonly known as "auto-enrolment".
- The Client wants to appoint the University to collect additional voter registration information of relevant students during the student enrolment and re-enrolment process, and at other subsequent moments. The Client also wants the University to make that voter registration information available to the Client to use as part of the Client's ongoing voter registration responsibilities.

The Services

3. Description of the Services

3.1 Description of the Services which the University must provide the Client under this Agreement

As indicated in the Specification.

4. Deliverables

4.1 Deliverables which the University must provide the Client as part of the Services.

As indicated in the Specification.

4.2 When a relevant Deliverable is considered 'completed' for the purposes of this Agreement