

Modernisation of the Electoral Registration Process - Public Consultation

1. What issues are being addressed?

The current electoral registration system works well and enjoys a high level of public confidence, but it is largely unchanged since the foundation of the State. It can be seen as complex and occasionally confusing and could make better use of available technology to help both the administration of the register and public interaction. Some of the specific issues raised reflect the impact of wider societal changes:

- An annual door-to-door canvas is resource-intensive for local authorities and may no longer be the most effective way to gather information every year.
- There is much more movement of people into and out of the country, and within the State – making it more complex for local authorities to use their own knowledge to update registers.
- Citizens now expect to be able to engage with the Public Service more easily including by using online access; many people already do, for example, with the Revenue Commissioners or the Department of Agriculture.
- The creation and publication of registers throughout the year is required by law but it results in a significant level of administration.
- Household registration of people for the electoral register, where one person can register a number of people living in the one house, may no longer be the best or most secure means of reaching all potential electors and keeping their information up to date.
- The process for registering people is mainly a paper-based one at the moment and it does not seem like the most efficient way to register people.

2. Background and context

The Government has decided that work should commence on modernisation of the voter registration process. The overall goal for this project is that it will lead to a more efficient, user-friendly system that will be easier for people to engage with and for administrators to manage, while also being absolutely secure.

2.1 What can affect the accuracy and completeness of the electoral register?

There is an ongoing challenge in keeping the electoral register up to date, accurate and complete. Additions to and deletions from the register are obviously needed when people turn 18, move address or die, but also when people leave the country or move here from another country. The reasons that people may need a postal vote or special voting arrangements will also change over time, which will mean that their entry on the register will need to change too.

2.2 Statistics and research

Annual statistics are collected by the Department of Housing, Planning and Local Government on the numbers on the electoral register for each local authority. In addition, in 2011, the Central Statistics Office (CSO), as part of the Quarterly National Household Survey, conducted a special module on voter participation and found that, of those who said they did not vote in the 2011 General Election, more than 35% gave not being registered as the main reason they didn't vote. Of those, 45% were in the 18-34 age category, 35% in the 35-54 category and 15% in the over 55 category.

Some UK research¹ has shown that one of the main reasons that information on the register is incorrect is that people have moved address. Clearly the fact that people generally move more now than they used to in the past suggests that there is a greater risk of errors arising in the future. Census 2016 showed 219,995 people over the age of 15 had moved house in the previous year, compared with 74,001 in 1996.

The Information Society Statistics compiled by the CSO in 2018 showed that 89% of households in Ireland have access to the internet at home. In 2018 over half of users obtained information from the websites or apps of public authorities; 43% downloaded or printed off official forms and 60% submitted completed forms online with 73% of users in the 30-44 age group and 42% in the 16-29 age group having done so.

Almost 450,000 people used the checktheregister.ie website in 2016 and 356,000 in 2017. The 2016 figures showed a significant spike in February which coincided with online campaigns by Google and Facebook in the run up to the 2016 General Election with a smaller peak in November, when an annual registration campaign is run by the Department and the Local Authorities. 2018 saw a huge number of people using the site – some 1.6million users to mid-October, with a significant peak just before the referendum in May.

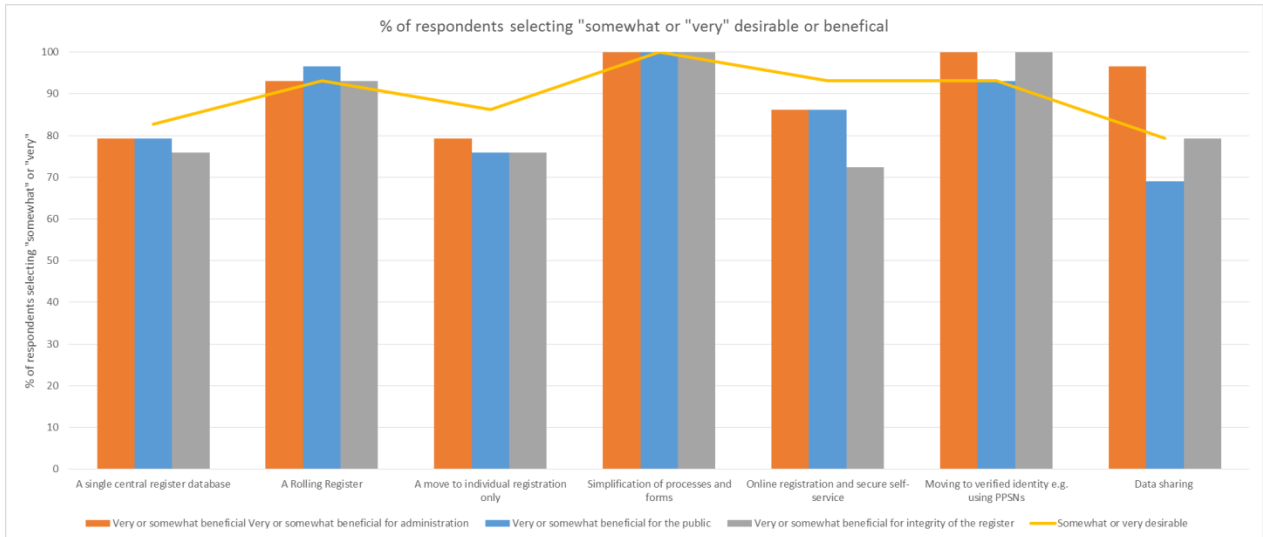
All of this suggests that some people might want online options for dealing with their electoral register information, while others might still prefer a paper-based version.

3. What consultation has taken place so far?

In the summer of 2018 a consultation process with local authority Franchise teams, who are experts in this area, was carried out to get their views on the proposals. These teams work with the register all year round and are familiar with the process but they also deal with the public – processing registration forms and dealing with any queries. They are therefore well placed to provide an overview of the proposals. The results of that consultation are [here](#).

There were broadly high levels of support for all the key proposals and they were seen as being generally beneficial in three main ways: for the public, for administration of the process and for the integrity of the register. While most of the proposals were considered beneficial for administration, the public and for the integrity of the register – some were seen as slightly more beneficial than others and some will be more complex to implement than others. Working out the detail of how implementation will happen will be a very important part of the project.

¹ https://www.electoralcommission.org.uk/_data/assets/pdf_file/0006/169890/Electoral-Commission-Census-2011.pdf



4. What are you being asked to consider?

The final reforms that are proposed after the consultation would represent the most significant change to our electoral registration process since the foundation of the State. Therefore it is crucial that as many people as possible respond. It is in all our interests to make sure that we include all issues in our considerations now so that any changes we make are the best they can be.

The series of proposals – set out in detail below – are being put to the public to gather views.

Questions you may wish to consider for the individual proposals, or the overall project include:

- Do you think that the overall project or some of the individual proposals will be positive?
- Do you see risks in some or all of the proposals and how can we reduce or manage these risks?
- How would these proposals impact on you?

Additional questions are included for each proposal but these are for guidance only and should not be seen as limiting the comments being invited. The electoral registration process affects all of us and so your views on any aspect of it are welcome.

5. Making a submission

- By Email – in Word format please, to registerreform@housing.gov.ie
- Alternatively, responses can be posted to: Electoral Registration Project Consultation, Department of Housing, Planning and Local Government, Custom House, Dublin 1, D01 W6X0.
- It should be noted that in the interests of transparency, all written submissions received will be made publicly available on the Department’s website. **[View privacy statement](#)**

6. Next Steps

- All material received will be analysed and used to help us prepare a proposal for the Government to consider.
- All material received will be made available on the Department’s website along with a summary and report of the consultation process.

- This project is expected to take approximately 2-3 years to complete and will examine the full range of policy, legislation and technology that will be needed to modernise the electoral registration process. Given how important the register is in Ireland’s democracy, the project will include more consultation later and ongoing communication on how it’s progressing.

7. Overall aims and key proposals

Enabling a better service to the public

We are aiming to make registration easier, by simplifying and streamlining processes and forms. Moving to individual rather than household registration will allow everyone to take greater responsibility for their own registration as well as ensuring their information is up to date, this will be supported by new options to register, including online registration and secure self-service.

Modernising the administration of the register

A single central electoral register database would allow Local Authorities to work within a standard system would bring together the existing 31 registers into a single register in a modern, secure database. A rolling register/continuous registration would create a single live register all year round with a single cut off in advance of an electoral event.

Maintaining and improving the integrity of the register

Identity verification, including through the possible use of Personal Public Service Numbers (PPSNs), could improve the integrity and security of the register and minimise duplicate entries or erroneous amendments. The potential of data sharing as a means of maintaining the register in the future will also be considered.

Other proposals being considered include:

- Allowing 16-17 year olds to register on a provisional basis with their details ‘going live’ on their 18th birthday. This would allow Local Authorities to engage with schools to encourage young people to register and explain how they can keep their details up to date in the future.
- Clarifying and simplifying procedures to facilitate those without a fixed address to register – being homeless should not affect your right to vote. A standard procedure would be helpful to ensure that all eligible people find it easy to register;
- Anonymous registration where a persons’ safety may be compromised by their details being publicly available e.g. where a barring order or similar court ordered provision is in place.
- Removing provision for the “edited register”, which is a version of the register, infrequently used, that can be purchased by any party and used for any purpose, including direct marketing.

8. Cross-Cutting themes related to the modernisation process

In preparing the final reforms to be proposed after this consultation a number of key themes that affect all of the proposals will be considered.

Identity, data, privacy

- Currently checks on the register are done by members of the public inspecting the draft register, and by An Garda Síochána checking forms and ID documents for entry to the supplement.
- Proposals to use the Personal Public Services Number (PPSN) have been made on a number of occasions as it could help to make the register more accurate and secure while making it easier for people to register.

- The main reasons for checking identity are to protect the principle of ‘one person one vote’ and to avoid duplicating people on the register or making changes to the wrong person’s details.
- While Local Authorities are allowed to use PPSNs under existing legislation, before making any changes to the data we collect and store, we want to understand both the benefits and any concerns about the proposal to make sure we take all necessary steps to address concerns and keep data safe and secure.

Technology and security

A recent Government report highlighted the importance of both the security and stability of our electoral process and recognised that modernising the electoral registration process would need to take full account of all potential risks including cyber-attacks for example. The development of the final proposals and any new technology will take full account of the need for the highest levels of security to protect our democratic process.

Evaluation and improvement over time

To ensure that the process of reform continues over the medium and long term, more information on the register will be needed. This will include better statistics on the accuracy of the register, regular surveys of how the public views the process and looking at ways to gather a clear picture of where we need to improve.

System Governance

The new process and the technology associated with it will need a plan to ensure that it works well in the long term – this will mean regular assessment and reporting. It is possible that the proposed new Electoral Commission could have a key role supported by Local Authorities.

9. The potential of these reforms

The proposals in combination could mean:

- Registration in a way that works for everyone – online or on paper
- A clear and simple process – one form, one process, one register – all year round.
- A single, secure database so local authorities can manage the register while protecting your data
- Balancing security and ease of access to protect the integrity of our registration process
- Building an electoral register that is secure, comprehensive and accurate
- Setting standards, limits and safeguards for possible data sharing in the future

To enable these reforms in full would require improved ways of checking identity such as using PPSNs, and some limited data sharing between local authorities (who manage the register) and between the register and other public sector bodies for verification purposes.

To ensure the safety and security of your data and the integrity of our electoral system:

- Data protection and privacy will be central at all stages
- Hardware and cyber security will be prioritised in any technology solution
- Strict usage rules for those working with the register, including penalties for any improper use
- Rigorous and ongoing security and stability auditing

10. The proposals in detail

Key Proposal No 1: Simplification of forms and process

There are currently 23 different forms in use for the electoral register. Under this proposal this would be reduced to one form to complete to register, or make a change to your record. Similar streamlining of forms for postal votes or special voting arrangements will be considered.

The new forms will be easy to read, and will include a clear explanation of why we need the information we're looking for, how we will use it and how we will store and protect it.

Benefits

One standard form completed online or on paper, would make sure that all the correct information is collected.

Risks	How can we address these?
- A single form could be more complex if not well designed	- We can check the form for plain English and accessibility, e.g. by the National Adult Literacy Agency
- There could be confusion in the changeover period	- We can include details of the new process in an awareness campaign - We can ensure that only the new forms are available online and at the usual pick up points

Background: While not an explicit recommendation of any particular report, the system is acknowledged to be somewhat complex. A number of other countries gather all necessary information on a single form.

Related proposals: Individual registration only and a rolling register combine with this proposal to create a simple, single form that applies to everyone all year round.

Questions you may wish to consider in your submission:

Are the benefits of a single simplified form clear?

Are there any risks to this approach that we have not identified?

Key proposal No. 2: A rolling register or continuous registration

This proposal would create a single "live" electoral register. It would mean that individuals could inspect the register at any time and submit updates or changes whenever necessary up to 14 days before any polling day. The day after polling day, the register would reopen and then be continuously updated until 14 days before the next polling day and so on.

Currently, the draft electoral register is published for public inspection in November each year and members of the public can then send in forms to make changes, which are reflected in the new final register published in February. After this point, and up to 14 days before any polling day, an additional list, known as the supplement, is kept of any additions to the register. While this process works well, it was designed for a different time, where the register had to be printed for people to see it and where a

lot of time was needed to submit forms and process them. Most people now check their details on checktheregister.ie and, while this site could be further improved, in addition, the register could be available for inspection at any time at a terminal in local authority offices.

Benefits

A rolling register would greatly simplify the process of registration as well as reducing the cost and work involved in prepared a number of different registers throughout the year. It would:

- create a single process, making it easier for people to register or update their details
- simplify administration of the register for local authorities
- The 'live' version would be available for inspection at all times and reassure people that their details were up to date

Risks	How can we address these?
- A lot of people might leave registering to the last minute before polling day resulting in pressure on IT systems and local authority teams	- Making registration easier could encourage some of these to register at different times, and could perhaps be prompted by targeted awareness campaigns. - Systems will be designed to withstand significant peaks in activity, to ensure they will be able to manage the demand in the days before polling day.
- Changes to the checktheregister.ie site might affect the security of people's data	- Technical options can be explored to protect data on this site or limit the number of queries possible in any given period or from any particular IP address - A terminal could be provided at local authority offices where the register could be inspected at any time by any person but not taken away or photographed.
- The current law provides that changes to the draft register are considered in the district court	- This may no longer be necessary and local authorities can deal with requests for update. A new provision for appeals against Local Authority decisions on the register could be put in place.

Background: Recommended previously by Oireachtas Joint Committees 2008, 2016 and the UCD report (2008).

Related proposals: Simplification of processes and forms.

Questions you may wish to consider in your submission:
Are there additional transparency or security measures you would like to see?
How do you normally check the register? How could this be improved?
A much more responsive online checker could also be available – currently checktheregister.ie reflects only the 'live register', and not the supplement – in your view, is inclusion of name and address, as in the current system, enough security for allowing people to check they are registered?

Key proposal No. 3: Optional online Registration and secure self service

Online registration would allow people to choose to manage their own entry onto the electoral register and then keep their own details up to date. There will still be a paper process for anyone who prefers that.

To ensure that people are who they say they are when they use the online system to register or update their details, we need to use secure identity verification technology. People already use MyGovID for some State services online, including Social Welfare and Student Grants via SUSI for example. MyGovID is available to anyone with a Public Services Card and approximately 2.7 million people already have a PSC so this option will be available to them.

Benefits: Making it much simpler to add or amend details will make it easier for people to keep their data up to date making the register more accurate. It will allow people to take responsibility for their details and make the process much quicker and more accessible for them.

Risks	How can we address these?
- Security of the portal from outside interference	Security and stability of the database and web portal will be very important.
- Stability of the portal	<p>It will need to be able to manage significant spikes in demand, particularly in advance of a polling date. It must also be secure from any interference.</p> <p>Technical security is a key theme to be considered in the development of the final proposals for reform that will follow this consultation. This will ensure that that all concerns are addressed and that all necessary steps are taken to protect your data and protect our democratic process where any new database or web portal is being developed.</p>

Background: The 2016 Oireachtas Joint Committee report recommended that online registration be investigated as part of the reform package and aspired to when there is satisfaction that it is secure.

Questions you may wish to consider in your submission:

Are the benefits of optional online registration clear?

Do you have concerns about this proposal? How might those concerns be addressed?

Is the benefit of using an existing system such as MyGovID clear?

Are you more likely to use this means of engagement with the register or another?

Key proposal No. 4 – Moving to individual registration only

A move to individual registration would mean that each person wishing to be entered onto the register or make any changes to their record would need to fill out their own individual form.

Currently a household form allows one person to complete the form on behalf of everyone at a given address for entry onto the draft register. While convenient for some – e.g. parents registering their adult children, it causes a number of issues in terms of data privacy, accuracy and identity verification. For example in rental properties where the people may not be related to one another, some may not be included on forms, while in some cases people might be included after they've moved and have registered somewhere else. This has important impacts on both the accuracy and completeness of the register.

Applications for the supplement to the register are already done on an individual basis and include a Garda identity document verification check. The legislation also provides that additional information can be requested at that time.

As part of this reform, and the proposal on simplification, a new single registration form would be developed. Each person applying to be on the register, changing their address or updating any details would complete the same form – this would significantly streamline the system of registration.

Benefits: This reform would make sure that each person knows that they are registered and what they need to do to keep their details up to date. It would also mean that people don't have to share information with others in their household, improving data protection.

Risks	How can we address these?
- Some groups, e.g. young people, who were previously registered by their parents may be less likely to register	- Specifically focussed awareness campaigns can help encourage these groups to register - A schools programme is being proposed as part of this reform to encourage young people to register early.

Background: Recommended previously by Oireachtas Joint Committees 2008, 2016 and the UCD report (2008).

Related Proposals: Simplification of processes and forms

Questions you may wish to consider in your submission:

Would having to fill out your own form to register make you less likely to do so?

Are the benefits clear to you?

Have we identified the risks and good ways to address them?

Key proposal No. 5 – Enabling a single national register database with unique identifiers

At the moment each Local Authority prepares its own electoral register. This proposal would bring together the 31 local authorities into a modern and secure central database. This would mean:

- Standard processes and procedures for all Local Authorities in how they manage and store your data
- Each person on the register would get a unique register number making it easier to find your individual record when you want to make a change to your details and meaning less chance of mistakes being made in updates of address for example.
- It would be easier for Local Authorities to avoid creating duplicate entries as they could see if a person was already registered in a different county. It would also be easier for them to communicate with other Local Authorities about any changes needed, for example when you let them know you've moved house.
- The process of bringing the registers together would provide an opportunity to identify any existing issues, such as duplicate entries for the same person, so they could be dealt with.

Risks	How can we address these?
- A single system would require additional security measures to protect our data from any interference or theft	<ul style="list-style-type: none"> - We can minimise the amount of data stored - We can put in place technical security measures that are regularly reviewed and updated - We can make laws about who can access the information, what it can be used for and set penalties for any improper use - As the final proposals are developed, we can prepare a privacy impact assessment that will set out these measures in detail.
- Combining registers will be complex, there may be concerns that people will be removed from the register by accident e.g. that they show up as a duplicate when in fact, there are two people with very similar details	<ul style="list-style-type: none"> - We can use another public sector database to compare with the register, if legally authorised to do so. - We can set out very clear procedures on how the work will be done and the process that will be followed. - We can contact any person that might be affected to check their details before any action is taken

Background: This was previously recommended by Oireachtas Joint Committees in 2008 and in 2016, and advocated by most submissions and witnesses at the 2016 Committee, including the Local Government Sector.

Related proposals: Proposal no. 6 verified identity – if we could use PPSNs it would allow us to match the information on the register (name, address, date of birth and nationality) with an existing secure database. For most people this would mean they wouldn't have to take any action to update at this time. For other people, there would be a follow up process by post and fieldworker to ensure we reach everyone eligible to vote.

Questions you may wish to consider in your submission:

Are the benefits of a single national register clear to you?

*Have we broadly identified the risks and how we might address them?
Do you have concerns about this proposal? If so, how might they be addressed?
What additional points would you make in this regard?*

Key Proposal No. 6: Moving to verified identity using PPSNs

Currently checks on the register are done by members of the public inspecting the draft register, by local authorities and by An Garda Síochána checking forms and ID documents for entry to the supplement.

This proposal would mean that when a person wants to be included on the register, or to update their details they would have to give their PPSN. This would allow a basic check against an existing public sector database (e.g. the Department of Employment Affairs and Social Protection’s PPSN database) to make sure that name, address, nationality, date of birth provided on the registration form match the information stored on the PPSN database and that they aren’t already included on the register. PPSNs would not be part of the register or appear on the register.

This would provide additional security for the register as people only have one PPSN and so couldn’t be included twice, and it would allow a check of eligibility for voting in a particular poll. It would also mean that if there is a match, no documentation would have to be presented. If no match is possible, the person would be contacted and asked to present additional documentation – similar to the current situation of presenting identity documentation to a Garda station. Using PPSNs would also help us in bringing together the current 31 registers and dealing with any issues such as duplications

The register is a public document, would my PPSN be safe? PPSNs would not be stored with the register. To allow local authorities to find records quickly, they would be stored but in a separate and locked-down database.

Benefits

- For most people, where a match is confirmed registration would be quick and easy – this works well in Northern Ireland and Britain, both of which use national insurance numbers in this way.
- It would improve security of the register by allowing for a check of both identity and eligibility while minimising the number of people who would need to provide additional documentation in person
- It would help in bringing together the existing registers and reduce the number of people who would need to be contacted in any clean-up process; and
- It could allow for the improved statistics to help assess the quality of the register over time.

Risks	How can we address these?
Some people may not wish to provide their PPSN	As part of this consultation we are asking people to submit their concerns so that they can be considered and addressed.
People may be concerned about privacy	Very clear procedures will be set out on the use of PPSNs – these will be clearly set out as part of the final proposals <ul style="list-style-type: none"> - PPSNs will never be on the register, - They will not be accessible by staff working on the register, except to verify a record - They will be securely stored in a separate system with

	<p>highly restrictive access provisions</p> <ul style="list-style-type: none"> - Technical security measures will be a key focus of the implementation proposal to ensure that data is safe and secure.
<p>People may be concerned about additional information being available to local authority staff working on the register</p>	<ul style="list-style-type: none"> - PPSNs will only be used as a cross-check of a small number of pieces of data relevant to the register - Verification checks will not provide details, and will only include a match/no match result

Questions you may wish to consider in your submission:

Do you think using PPSNs offers a balance of an easy process to register and security?

Would you be satisfied to provide your PPSN as part of a simplified registration process?

Do you have concerns about the use of PPSNs?

How might your concerns be addressed?

Do you think there are alternatives that provide a similar or better outcome?

Background: The 2016 Oireachtas Joint Committee recommended *“the use of a unique identifier such as PPSN to address the problems of inaccuracy and incompleteness, in a manner compliant with the Data Protection Acts 1998-2003 and alongside enhanced data sharing between public bodies”*

Related proposals: Simplification of forms and processes, individual registration only; data sharing.

Key Proposal No. 7 - Data sharing to maintain accuracy and comprehensiveness

While an annual door to door or postal canvas will gather a lot of information, it could be out of date very quickly as people move house for example.

Data sharing for the electoral register can mean two things:

- Sharing data between local authorities as they work on the register – this is important as it will improve how they communicate and will make sure that people moving between counties can trust that their information is being correctly updated. A single database will make this process work better.
- Data sharing between different organisations for the purposes of updating the register – for example by allowing for the register to be checked against the PPSN database. Other types might include allowing people to change their address on the register at the same time as they change it for motor tax or another public service; currently, the General Register Office sends lists of people registered as deceased to the local authorities to update the electoral register.

The information that would be shared would be minimal. The register only uses a small number of pieces of information– confirmation of identity (possibly PPSN check); age; citizenship and address/eircode. Data sharing could allow for some sharing of life events such as marriage that could enable a prompt asking if someone would like to update their details on the register.

Benefits: A key benefit of data sharing would be for people changing their address, for example, if it would mean only having to do it once for a public sector body and knowing that it would be copied across to the electoral register so they wouldn't have to update that separately.

Risks	How can we address these?
Other databases might not be as up to date as the electoral register	<ul style="list-style-type: none"> - Each different data source would have to be looked at individually - People will be made aware of what data might be shared and with which organisations
People may be concerned about data sharing and privacy	<ul style="list-style-type: none"> - We can minimise the information being shared – the register only needs a few pieces of data. - A very transparent process that explains clearly what data is being shared and from what sources will be set out as part of the final proposals for reform

Background: The 2016 Oireachtas Joint Committee recommended “*the use of a unique identifier such as PPSN to address the problems of inaccuracy and incompleteness, in a manner compliant with the Data Protection Acts 1998-2003 and alongside enhanced data sharing between public bodies*”.

Related proposals: Verified identity using PPSNs, data sharing would mean that we need to be absolutely sure whose details we're updating.

Questions you may wish to consider in your submission:

Do you think data sharing seems beneficial?

The last time you moved house, would it have been useful to be able to choose an automatic update of the electoral register when making another amendment, e.g. Revenue Commissioners?

If people could update their own details online or by a much simpler paper process, would data sharing be needed at all?

Do you have concerns about data sharing?

How might those concerns be addressed?

Other proposals being considered:

1. Allowing provisional registration for young people aged 16-17 who could get on the register, through a schools programme for example, with their registration automatically becoming active on their 18th birthday;
2. Specific provision for people with no fixed address e.g. people experiencing homelessness to ensure a standard procedure across the country;
3. Provision for anonymous registration for people whose safety may be at risk if their details are public on the register, for example where barring orders or other court ordered protections are in place.
4. Removal of provision for the edited register which is used infrequently in any case but may no longer be an appropriate use of data connected with the electoral register.

Questions you may wish to consider in your submission:

What are your views on these proposals?

*Do you have concerns about them?
How might those concerns be addressed?*

11. Make a submission by 15-03-2019

Questions you may wish to consider in respect of each of the proposals, or the overall picture include:

- Do you consider the overall impact or the impact of an individual proposal to be beneficial?
- Do you see risks in some or all of the proposals and how these might be mitigated?
- How would these proposals impact you, taking account of any recent experiences with the register?

Additional questions are included for each proposal but these are for guidance only and should not be seen as limiting the comments being invited. The electoral registration process affects all of us and so your views on any aspect of the process and its potential improvement are welcome.

- By email (in Microsoft Word format please) to registerreform@housing.gov.ie
- Alternatively, responses can be posted to: Electoral Registration Project Consultation, Department of Housing, Planning and Local Government, Custom House, Dublin 1, D01 W6X0.
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