

# **Modernisation of the Electoral Registration Process - Public Consultation**

## **Submission by Christopher Britton**

20 February 2019

I welcome the opportunity to express my comments with regard to the proposals to modernise the electoral registration system. My comments below are mostly based on my own experience, although I do also comment on some aspects of the proposals where I feel there may be a concern in their implementation.

### 1. Key Proposal Number 1: Simplification of the process

If the number of forms used can be reduced to one, then of course this has to be beneficial both to applicants and those processing the form. The challenge will be to get all the requests for information currently spread across 27 different forms onto the one form and in so doing ensure that it is easy to use and understand.

### 2. Key Proposal Number 2: A Rolling Register or Continuous Registration

This has to be the most important aspect of the proposed modernisation, I would argue. I was considerably taken aback when moving recently on a permanent basis from the UK to Ireland to find that I have to wait over a year before my name can appear on the electoral register! The 'operative' date under the current system is 1<sup>st</sup> September, at which point an applicant to go on the register must be normally resident in Ireland. As I moved to Ireland in January, I do not qualify until this coming 1<sup>st</sup> September, at which point my name will join the register being compiled that autumn, and will only appear when that register is published in February 2020! That will be fully 13 months without the right to vote! In the twenty-first century this really is antediluvian.

I trust that the requirement to be normally resident in Ireland on 1<sup>st</sup> September will be dropped at the same time as the proposed other modernisations take place. I cannot really see the justification for it, if an applicant qualifies on all other grounds, especially citizenship.

The risks associated with introduction of a rolling register, combined with individual registration only, have been rightly recognised in the proposals: most significantly, a sudden surge of applications when an election is announced. It is only human nature that many voters will forget about registering until an election is approaching. It's not the top priority for most people.

### 3. Key Proposal Number 3: Optional On-line Registration and Secure Self-Service

Whilst on-line registration must be a given in this day and age, it is not clear to me how the accuracy checking will work, especially if applicants do not have MyGovID and/or a Public Services Card. Will these become mandatory for people wishing to register to vote on line? If so this seems like an obstacle which will discourage many from registering. Whilst paper applications will still be

accepted and an alternative for those without MyGovID or Public Services card, there will be some who will want to use the on-line service only and not bother with a paper form.

#### 4. Key Proposal Number 4: Moving to Individual Registration Only

This does seem sensible and will in certain cases enhance data security and privacy, as described in the examples given, but leaving the onus to register on an individual is I suspect likely to mean many, especially younger, people will simply forget and not even realise that they have to register. In some cases some will learn too late that they may not vote because they haven't registered. (This already happens in the UK, I believe, where the move has been to individual registration over recent years). This risk needs to be actively tackled. Once a young person has missed out voting in their first election, statistics show there is a high probability that they will not bother later on in life. Awareness campaigns are one means. Is there any proposal to make councils pro-active in encouraging individuals to register, or is it envisaged that the state will be completely passive in the process, and leave the onus on the individual to remember?

#### 5. Key Proposal Number 5: Enabling a Single National Register Database with Unique Identifiers

The benefits of a single database are well rehearsed in the proposal document. However, I think the risks are downplayed somewhat. A single national register database is a single point of failure, if other measures are not actively implemented. What happens if the database, for whatever reason, is not accessible for a period of time? What if it is extensively corrupted through a malicious attack (or even by accident)? Whilst I do not expect the relevant security measures to avoid this situation to be shared with the general public, this sort of scenario must be actively considered and measures to recover from it put in place.

#### 6. Key Proposal Number 6: Moving to Verified Identity Using PPSNs

Again, I believe the consultation document makes the benefits of such a move clear. It would enormously help to avoid duplicate entries, since each individual has only one PPSN (well, we hope they do!).

One point which does occur to me is this: if at the time a PPSN is allocated a piece of information which affects the right to vote (I am thinking here of nationality) is included which over time changes, what would happen? For example, where a PPSN entry shows the individual to be a British citizen (which would mean no right to vote in referenda), but in fact they have since gained dual Irish/British nationality, or have changed to Irish nationality only, how would the individual concerned ensure that they have the right eligibility status on the electoral register? Would electoral registration staff be bound to point out that after they had checked against the PPSN database entry, that they were going to place a restriction in voting eligibility against their entry?

## 7. Key Proposal Number 7: Data Sharing to Maintain Accuracy and Comprehensiveness

The consultation document correctly identifies the benefits of data sharing as outlined. But again, I think the risks have been downplayed somewhat. The document does not make clear, in fact doesn't even mention, what risks there are when databases for one purpose are opened up to access by people from other organisations for other purposes. It should be axiomatic that the amount of access and the ability to edit data should be tightly controlled, but I wonder how far in fact this will be ensured.

## 8. Other Proposals Being Considered

1. Provisional registration of 16 and 17 year olds. This should help to alleviate the problem of young people being excluded because they simply do not know that they need to register themselves.

2. Provision for those with no fixed address. This has to be welcomed as not having a fixed address disqualifies people from so many aspects of modern society. Whilst being able to vote with no fixed address will be welcomed by some in that situation, I suspect it will not be at the top of their priorities list. And if they have no fixed address, where do they vote? Will they be able to vote at any polling station?

3. Anonymous registration. This has to be welcomed for those whose safety may be at risk. But the implication in the consultation document ('if their details are public on the register') is that any member of the public may peruse the electoral register in its entirety, not just check their own specific entry for accuracy. That is worrying.

4. Removal of the edited register. It is of course a good move to remove something of which little use is made, but this implies that what will be left is a fully public register. I would want to be reassured that that is not the case. It should only be 'public' to those who have a need to know my individual entry on the register, no more and no less.