

# Modernisation of the Electoral Registration Process: Initial consultation with Franchise Teams in Local Authorities – Report

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## Background and context

Successive Oireachtas Committees as well as external reports have identified a number of improvements that could be made to the electoral registration process. In March 2017 the Government determined that work should commence on modernisation of the voter registration process in the context of the possible need to register voters resident outside the State in the event that the referendum on extending the franchise in Presidential elections, scheduled for May 2019, is passed.

The project, which will take some 2-3 years to complete will include consideration of wider policy and legislative changes as well as initiatives such as online registration, with an initial focus on a series of proposals including those made by the Joint Committee on Environment, Culture and the Gaeltacht in its report of the consultation on the proposed Electoral Commission in 2016.

### Overall aims and key proposals being considered

#### Modernisation of the administration of the register

A single central electoral register with unique identifiers 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.

#### Enabling a better service to the public

Making registration easier, by simplifying and streamlining processes, combined with a move to individual rather than household registration will enable individuals to take greater responsibility for their own registration as well as ensuring their information is up to date. Optional online registration and secure self-service could further facilitate registration and data management.

#### Maintaining and enhancing the integrity of the register

Identity verification, including through the possible use of PPSNs, could enhance the integrity 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, in place in other jurisdictions, include:

- Provision for provisional registration, e.g. for 16-17 year olds, which would automatically activate on their 18<sup>th</sup> birthdays enabling a schools programme to maximise youth engagement.
- Clarifying and simplifying procedures to facilitate those without an address, for example people experiencing homelessness, 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.

This is a significant project that will have long-term and far reaching implications for Ireland. Therefore, significant consultation is planned to engage all stakeholders, including registration authorities, the political system at all levels, and the public. Keys steps in this element of the process include:

- Consultation with registration authority franchise teams – August/Sept 2018
- Political briefings – October 2018
- Public consultation – to include stakeholder engagement – November 2018 – January 2019.

## The consultation process

On 30 July 2018, a survey was issued to everyone on the Franchise Designated Officers list held by the Franchise team in the Department of Housing, Planning, and Local Government, seeking their input to the development of policy in relation to the modernisation of the electoral registration process by 12 September 2018.

Responses were received from 29 out of 31 Registration Authorities – of these 8 submitted the response via the online survey tool; 15 submitted completed word documents and 6 submitted pdfs. This is worth noting as a learning point for future consultations – a lot of time was needed to pull the responses together for analysis that could have been saved with a greater number of survey based responses.

The quality of all responses received was high, with all giving considered free text responses in addition to the scoring of individual proposals.

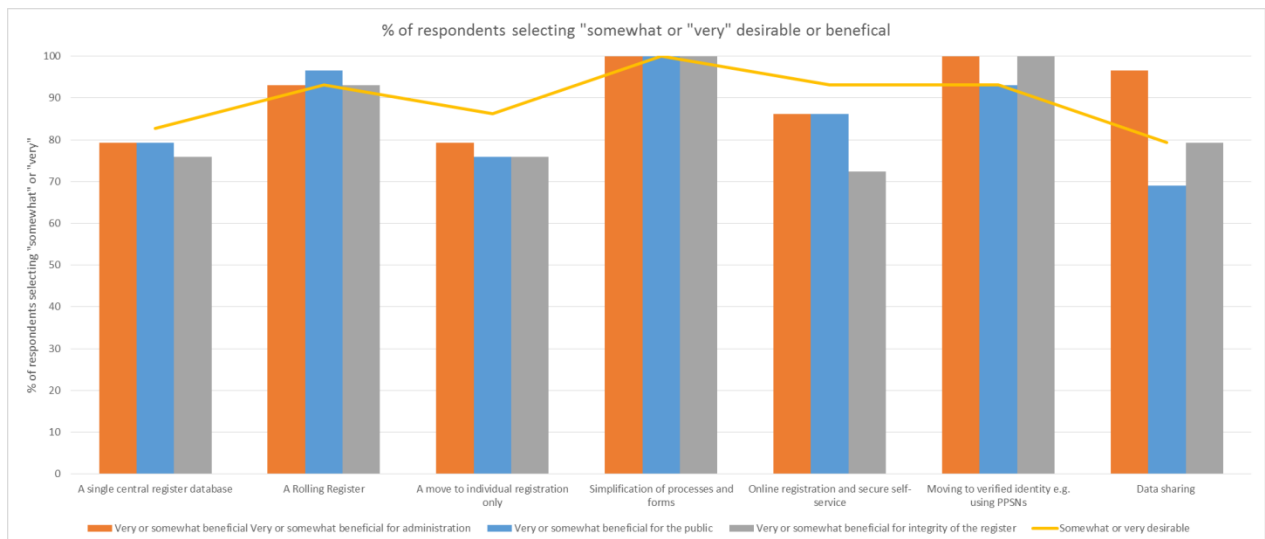
The survey invitation also included an invitation to a feedback session for Local Authority Franchise teams at the Custom House. While initially planned for 4<sup>th</sup> October, this ultimately took place on 21 September 2018. All bar two Local Authorities were represented at the feedback session and some 43 people attended the session in total. There was a good level of participation and some points additional to those covered in the survey were raised.

The meeting showed the value of the group and the potential for further engagement both between the Franchise teams themselves to share information and discuss procedures, but also with the Department's franchise team in helping to gauge certain issues and practices that may require additional support. The implications of data protection legislation, and in particular the GDPR, received significant attention on the day. While Local Authorities are the data controllers and must therefore satisfy themselves as to the legal basis for their work in data protection terms, it is clear that some support or guidance from the centre would be welcomed – though it should also be noted that the franchise teams themselves demonstrated a significant body of knowledge and information on how particular issues might be handled and given some practical examples raised at the feedback session, it would appear that these may be best addressed within that group on the basis of shared knowledge and experience. In this, the Department might best assist by providing a space/time for Franchise teams to meet and discuss these issues, perhaps through an annual network meeting, though again this could also be organised at local authority level. Further meetings of franchise teams will be considered, at a minimum, for the duration of this project to ensure timely information sharing and feedback.

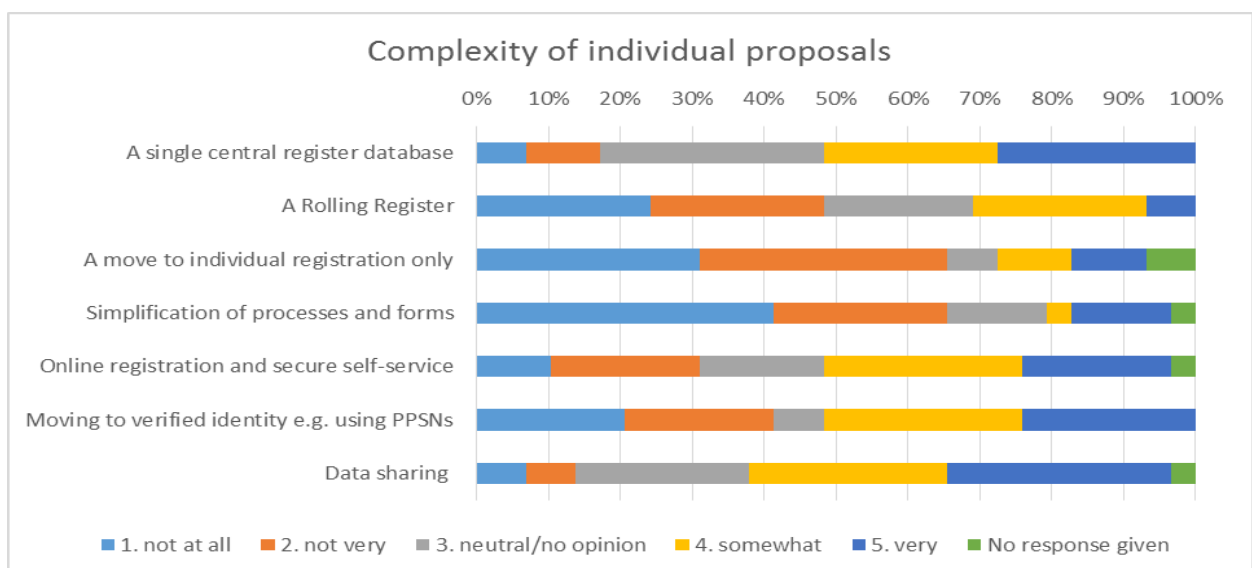
At the feedback session, the Department presented an overview of the project and identified a number of key themes that impact across many of the individual proposals and will need to be considered as issues in and of themselves – areas that will be subject to separate and detailed analysis over the course of the project. These include identity verification, data and privacy; technology and security; long term system governance and evaluation and improvement over time.

## Consultation Process - Overall outcomes

In general, there were high levels of support for all the key proposals, largely in line with how beneficial they were perceived as being on the three criteria: for administration, for the public and for the integrity of the register. While most were considered beneficial for administration, the public and for the integrity of the register – the changes in levels of support correlate to the drop in perceived benefit across the three criteria. The potential data sharing proposals showed the most significant drop in desirability and is matched with the lowest score for perceived benefits to the public of that measure.



As might be expected, while the overall proposals are largely welcomed, the assessment of complexity of implementation varies and suggests that the details will be critical to a successful modernisation programme. The specific points raised are discussed in the relevant sections below. Data sharing was considered to be one of the more complex proposals to implement which may also explain its position at the lower end of desirability. Interestingly, individual registration wasn't seen as particularly complex – notable since a number of authorities raised the recent UK experience. This may be due to the slow improvement model proposed for these reforms – a change over time with a new form being introduced may have been seen as mitigating the potential for complications.



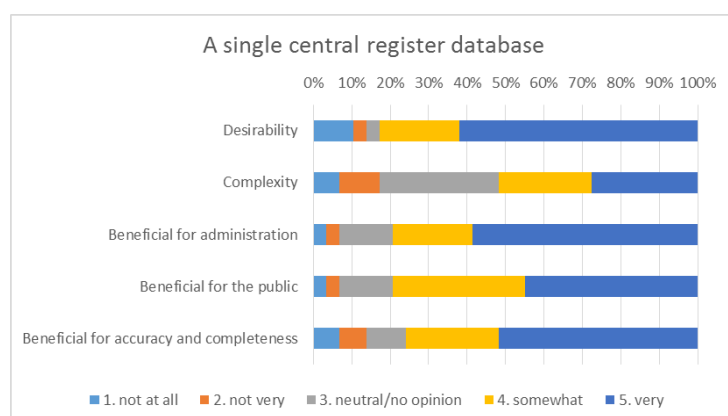
## The Key Proposals

In the survey, franchise teams were asked to rate each proposal for desirability, complexity, and how beneficial they considered it likely to be for administration; the public; and the accuracy and comprehensiveness (integrity) of the register. They could rate these on a scale of 1 (not at all) to 5 (very). Each proposal also had a free text option in which comments were invited on benefits, risks, issues for implementation or any other views on that proposal.

Additional specific questions were asked in relation to a number of the proposals.

### Single register

**From the consultation paper:** Making provision for a single national register would enable the



*bringing together of the registers of 31 local authorities into a single central database. The implementation of a modern integrated database would, even at the simplest level, standardise the format of data held and enable improved reporting on the register and its management.*

This was largely seen as desirable and beneficial while most didn't regard it as particularly complex to implement; though the need for a unique identifier within the database was clearly recognised.

In general, the advantages of a single register database were widely acknowledged but the risks and issues arising were also identified by most respondents – these centred largely on security and stability of any database and the need for continued input by local authorities in relation to their own areas. Data protection, possible public reluctance and questions about how to manage and clean existing entries were raised.

<b>Benefits</b>	<b>Risks, Issues, Questions</b>
Less administration, streamlining Reduce duplication Ability to transfer voters More accurate Standardise processes/consistency Need for a unique identifier Potential for data sharing	Accuracy (loss of local knowledge) Security, Stability Data protection Public reluctance How to manage existing data/cleaning

Governance was considered a key issue by respondents. An additional question had been included to seek views on potential new governance arrangements and this showed that a majority favoured a system whereby individual local authorities would continue to manage their own listings but within a shared database. For the small number of authorities that considered a single register database undesirable, this seemed more related to concerns around governance, i.e. centralisation of franchise functions away from local authority offices rather than concerns regarding the single register per se.

Key themes in the free text comments included the need for a continued local service, both to ensure accuracy by bringing local knowledge to bear on the work related to the register, but also to

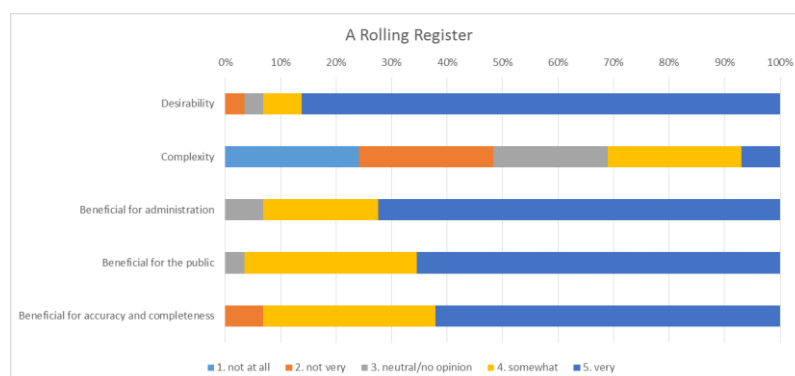
meet local expectations of being able to conduct business on the register at their local authority office. A number of comments also referred to likely political opposition to any centralisation of the franchise function. Practical considerations were also included, for example that the inevitable surges in applications close to closing dates would be too much work for any one local authority tasked with say, a shared service, but there was also acknowledgment from some that some centralised oversight and management would be beneficial – the proposed Electoral Commission was mentioned in this regard.

**At the feedback session,** in response to a question regarding use of the PPSN as the unique identifier, it was clarified that even if a decision is taken to collect and store the PPSN for purposes of identity verification, the PPSN would explicitly *not* be used as the stand-alone unique electoral register ID. It would not be stored with the register or other details; rather it would be housed separately and securely in a different database that would only store the minimum information needed to link the PPSN to the unique Electoral Register ID. It was agreed that the exact nature and form of a unique Register ID would take further consideration and development.

### Rolling register

**From the consultation paper:** A rolling register would mean that individuals could apply to be included on the register at any time during the year with the only cut off being a set period before an electoral event. The register would be updated in something approaching ‘real time’ and would be available for inspection at all times. This updating would still be subject to necessary checks by registration authorities. A rolling register would greatly simplify the administration of the register –

*removing the need to publish a draft and final register and then manage a supplement.*



The benefits of a rolling register were recognised by most respondents with considering it “somewhat” or “very” beneficial for administration and the public. Reducing

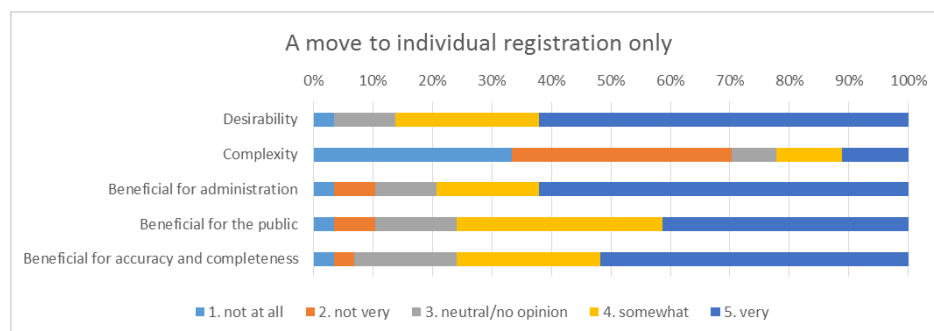
confusion was one of the main comments made in the freetext responses, acknowledging that the current system of publishing draft and final registers and then managing a supplement led to confusion for the public but also for administrators. In addition, voters could be reassured of their details being correct and would be able to see changes reflected within a reasonable time frame. The potential risks however, in relation the potential decline in accuracy that could arise from voter complacency leading to significant peaks before electoral events, were also well recognised.

Benefits	Risks, Issues, Questions
<ul style="list-style-type: none"> <li>• Saving time, costs, paper, Less administration</li> <li>• Simpler, single process</li> <li>• <b>Less confusing</b></li> <li>• Reassuring to voters</li> </ul>	<ul style="list-style-type: none"> <li>• Potential decline in accuracy</li> <li>• Checking role of draft register, claims courts could be lost</li> <li>• How best to ensure transparency and access</li> <li>• Role for field workers?</li> <li>• Cut-off dates</li> </ul>

While no specific comments followed at the feedback session, the checks and balances, currently performed by the draft register publication and the claims court were discussed later in the session. This is covered in more detail below under “Claims”.

### Individual Registration only

**From the consultation paper:** *The system of household registration provides that one person can*



*register all members of the household for the draft register by completing the RFA form. In contrast, applications for the supplement to the register are done on*

*an individual basis and include a Garda identity verification check reflecting the different time scales available for checking information supplied. Moving to a system of individual registration would improve integrity by ensuring that each individual is aware that they are being registered and where they are being registered, encouraging them to take responsibility for the management and maintenance of their data.*

Benefits	Risks, Issues, Questions
Improving integrity Give control to individual Accuracy Awareness Improved data privacy Would require unique ID to work	Loss of some demographics How to deal with previous occupants/inactive entries

While the freetext responses clearly identified a number of significant benefits, respondents seemed less sure of this proposal with more neutral/no opinion responses. Overall still a majority considered the measure both desirable and beneficial even as they also recognised the risks related to implementation.

An additional question had been included in the consultation paper to seek views on how loss of certain demographics, shown to occur in other jurisdictions when household registration was abolished, might be avoided and also how, in the absence of a household form, inactive entries could be identified.

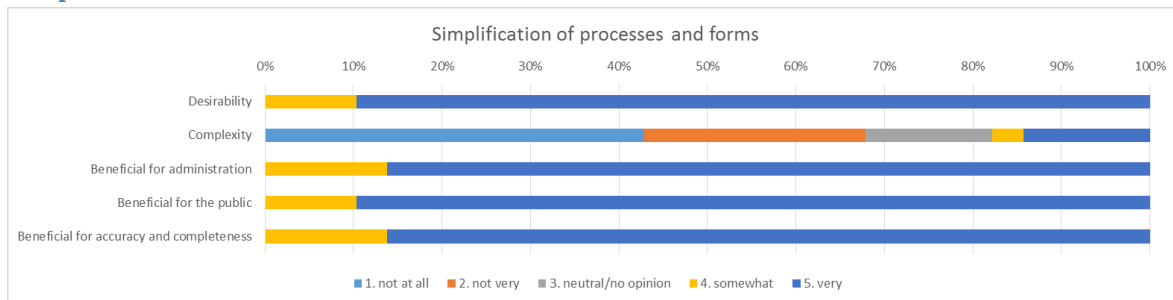
Targeted public awareness campaigns and registration drives were mentioned in response to this (and to a number of questions where issues of awareness were raised) but the need to focus on particular demographics was noted. Other suggestions included a census style form issue and collection (one per person in household) and possible mandatory registration. A number of respondents made the point that the “*onus must be on the individual to register*”.

This was also raised in the **feedback session** and while the Department acknowledged the need for each individual to take responsibility for their registration, the fundamental importance of the responsibility of compiling an accurate and comprehensive register of electors residing with the

state was emphasised as “a state-initiated system will produce a more complete list of eligible voters than will a voluntary [or self-initiated] registration system<sup>1</sup>”.

Regarding means of identifying entries on the register that should be removed or at least checked there were varying views on invitations to register, these largely related to the lack of response to postal queries generally. Some suggested the marked register could be used to identify entries to follow up; others looking at returned polling cards.

### Simplification of forms



Notably this is the only proposal where everyone responded that it was either “somewhat” or “very” desirable, as well as beneficial on all counts. Complexity was also seen as “not at all” or “not very”, leading one respondent to refer to this as the “most achievable option”.

Benefits	Risks, issues, questions
<ul style="list-style-type: none"> <li>Reduced paperwork/more care needed</li> <li><b>Less confusion</b></li> <li>Less error</li> <li>One bilingual form all year</li> <li>User-friendly, use tick-boxes</li> <li>Transparent</li> </ul>	<ul style="list-style-type: none"> <li>Form should be machine readable</li> <li>Should be NALA approved</li> <li>Need to destroy all existing forms to avoid confusion</li> <li>Public awareness campaign needed to highlight the move to the new form.</li> </ul>

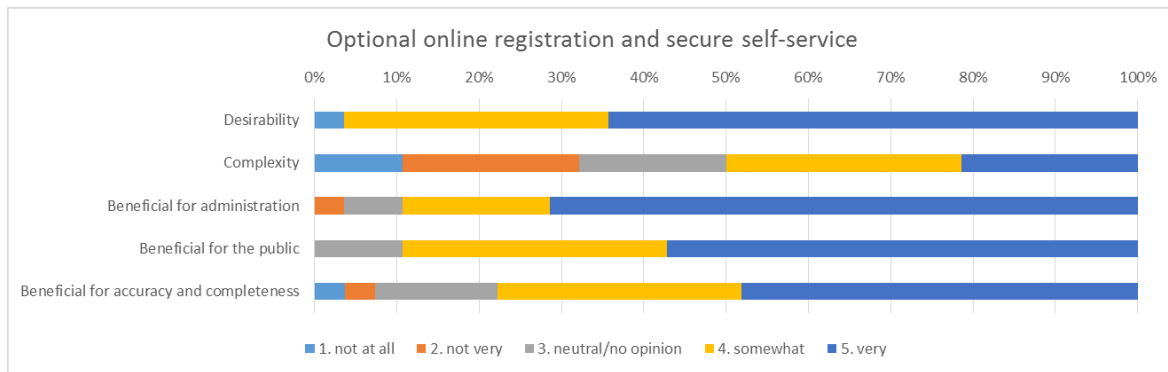
**At the feedback session** discussions later in the day came back to the issue of forms. It was pointed out that a lot of people don’t know that the electoral register is used to put together jury lists, or that the register is used by elected representatives and candidates to organise canvassing. So, the need for clear forms that also explain what the electoral register can and cannot be used for, who has access to the register, and that GDPR compliance should be a key focus in the re-design. Printing costs, particularly where forms were required to be of different colours etc. were also raised, though it was noted that this is unlikely if only a single form is needed.

### Option for online Registration

**From the consultation paper:** Online registration would enable would-be voters to manage their own interaction with the electoral register and maintain and manage their own details. Online access could encourage registration by making it simpler and more accessible, particularly for younger voters and more mobile voters who are more likely to move more frequently, making the current system for updating registration details somewhat onerous.

<sup>1</sup>ACE Project <http://aceproject.org/main/english/vr/vra07.htm> accessed 25/09/2018





This proposal was again seen as somewhat or very desirable by most respondents and largely beneficial on all counts, though the free text responses raised more questions and issues than specific benefits – also shown by the range of views on the complexity of implementing the proposals. Issues raised included the reliance on people actually entering their details correctly; how to ensure the security and stability of the system; and the need to ensure that, as presented in the consultation paper, that a paper/in-person option continuing to be available for those who are unable or do not wish to use the online system.

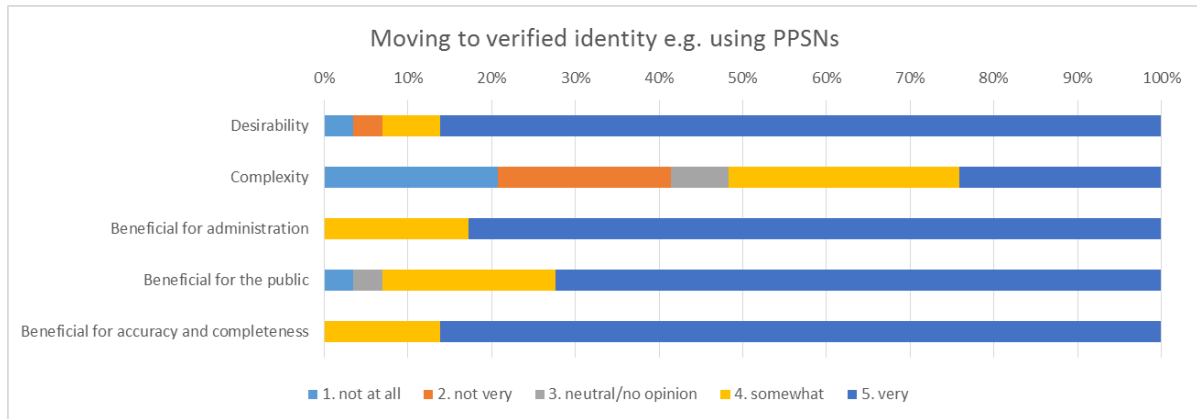
Benefits	Risks, Issues, Questions
<ul style="list-style-type: none"> <li>• People prefer to do things online</li> <li>• Onus is on the person to register themselves accurately</li> </ul>	<ul style="list-style-type: none"> <li>• Mandatory fields should be included so that citizenship and DOB is completed.</li> <li>• People prefer to do things online</li> <li>• The system would have to be able to withstand <ul style="list-style-type: none"> <li>• surges at peak times</li> <li>• any possible interference from hackers</li> </ul> </li> <li>• Dependant on the use of a unique ID</li> <li>• Could be open to abuse if not managed well</li> <li>• Back office function still required to verify applications, manage possible duplication</li> <li>• Additional documentation may be necessary</li> <li>• Parallel paper process needed</li> </ul>

**At the feedback session**, comments from members of registration authorities included the need to make certain additional information mandatory for form completion – eircodes were repeatedly mentioned in this regard given the number of non-unique addresses in some rural areas; date-of-birth was also mentioned. This fed into a wider discussion on information to be sought and was picked up again under “verified identity” as use of a unique ID was agreed as necessary to manage an online registration system. The importance of reassuring the public on the handling of this data i.e. that it would be kept confidential or deleted once confirmed. Also of relevance is the voter.ie project which was subject to a separate presentation, detailed below.

### Verified identity

**From the consultation paper:** *While under the current system, applications for entry onto the supplement to the register also require identity verification with an ID check by a member of the Garda Síochána from the applicant’s local station, mandatory ID checks are not required for those applying for inclusion on the draft register, creating different processes and different levels of security for entry to the register. Standardising oversight and verification should be a goal of this*

reform programme, balancing a robust system of security and integrity with simplicity and workability taking into account both the administrative burden on electors and the efficiency of the process. The purpose of establishing identity at the point of entry to the electoral register is to ensure that each person who is entitled to vote is included only once; that no one ineligible to vote is included; and to ensure that individuals' information is not erroneously edited or removed.



While a very small number of respondents considered the risks in terms of creating a barrier to registration too high, most considered this very desirable and the free text commentary supported this view by setting out the benefits – primarily in reducing both existing and future duplication risks; improvements in accuracy and the ease of verifying details and ensuring that changes or updates were applied to the correct individuals. That’s not to say that those supporting the measure didn’t recognise the risks including the potential for public resistance or reticence about sharing this information. The need for clarity on security, data management and data protection was highlighted by many as were the workability issues – such as how to deal with existing entries and how supporting documentation would be sought and managed. In addition, almost all respondents considered verified identity as being beneficial for administration, the public and integrity of the register.

An additional question was asked in the consultation paper to seek views on the documentation or information that could be sought for verification of identity – giving the example of MyGovID as offering a solution for optional online registration, views were sought on how to verify for other types of application. Responses included PPSNs and photo ID; passports and other documentation, PSC, utility bills etc.; allowing for the checking of documents at local authority offices as well as Garda stations.

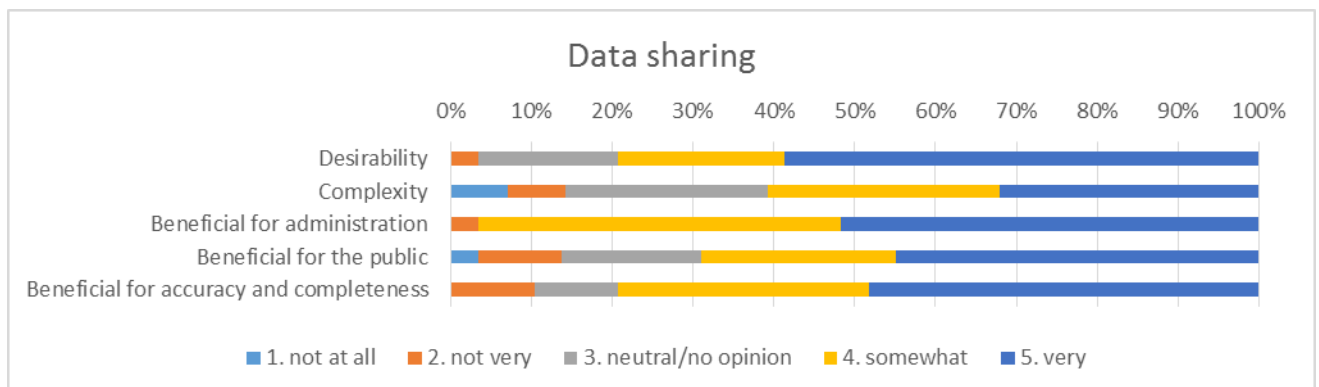
Benefits	Risks, issues, questions,
<ul style="list-style-type: none"> <li>• <b>Reduction in duplication</b></li> <li>• More accurate</li> <li>• Easier to verify details, identity correct individual</li> <li>• Could be combined with Eircodes</li> <li>• Could facilitate data sharing simplifying the process of moving address or citizenship changes.</li> </ul>	<ul style="list-style-type: none"> <li>• Barrier to registration</li> <li>• Public resistance</li> <li>• Risks of data breaches</li> </ul>

**At the feedback session** the issue of alternative means of identity verification was raised – for example seeking innovative private sector solutions that are already in use in for example the banking sector (verified by visa or similar). While it was pointed out that no decisions had been taken and that these proposals were still at an early stage, the PPSN and PSC/MyGovID systems are available and, in the case of the PPSN are already widely used to verify identity when accessing certain public services.

The concerns and questions raised by respondents were split into two groups – workability, which considered how to deal with existing entries and how documentation would work; and data protection. The data protection issues relate to the proportionality and necessity of using something like PPSNs in managing the register and it was acknowledged that these important public interest tests would need to be met. The need to consult the public on their views on this issue was clear – including to identify what concerns people have about the use of PPSNs for example and whether and what measures could be taken to reassure them on these.

### Data Sharing

*From the consultation paper: While an annual door to door or postal canvas will gather significant amounts of data for the register, it is not clear that it will be a sustainable means of keeping up with the pace of change, particularly capturing a more mobile population in the context of a rolling register. A single database – key proposal No.1– rather than the current system of 31 separate registers will in itself greatly facilitate data sharing between local authorities to promote greater accuracy. In addition, a number of the reforms proposed above could also provide a framework within which data sharing with other public sector bodies could allow for details to be updated automatically, for example when someone notifies a change of address to some public bodies. There are both data protection and workability issues around the idea of data sharing that need to be fully considered.*



In all, this was the proposal with the lowest numbers of respondents considering it “very” desirable or beneficial. While almost all acknowledge the potential benefits, particularly for administration, significant issues were raised – one of the main themes of the comments was the lack of control over the accuracy of data inputted by other bodies.

Benefits	Risks, issues, questions
<ul style="list-style-type: none"> <li>“very beneficial as people often feel that they supply the same information to a number of places”</li> </ul>	<ul style="list-style-type: none"> <li>“No internal control over the accuracy of what is inputted by other bodies”</li> <li>“matching will still need manual input”</li> <li>What is the impact of GDPR? The possible role for tick boxes and consent</li> <li>Could Eircodes be included here?</li> </ul>

	<ul style="list-style-type: none"> <li>• Issues of different addresses being used for different purposes requiring follow up</li> <li>• Unique identifier crucial</li> <li>• Data protection training needed</li> <li>• Electors may be suspicious and not willing to share information and decide not to register to vote</li> </ul>
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An additional question was asked to seek views on what data sources franchise teams considered might be helpful in compiling and maintaining the register. It should be noted that the information required for the register is limited and any data sharing arrangement would be similarly limited in scope and potentially non-reciprocal, in that the electoral register can only be used for electoral purposes. Ideas and suggestions submitted as potential sources of accurate and up to date details such as name, address, DOB and citizenship, are presented here without comment and acknowledging that some of these may not be appropriate or possible, included:

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• Revenue</li> <li>• DEASP</li> <li>• Other Local Authorities</li> <li>• Other departments within local authorities</li> <li>• An Post</li> <li>• CSO census data</li> <li>• Googlemaps</li> <li>• Motor tax</li> </ul> | <ul style="list-style-type: none"> <li>• Department of Defence</li> <li>• Department of Justice (citizenship)</li> <li>• DFAT</li> <li>• Driving licence</li> <li>• Passport office</li> <li>• SUSI</li> <li>• iHouse</li> <li>• PRAI, PRTB</li> <li>• Deaths, marriages, name changes</li> </ul> |
|--|---|

### Other reforms

**From the consultation paper:** Some examples of initiatives that operate in other jurisdictions also being considered as part of this work include:

- (i) allowing provisional registration for young people aged 16-17 who could get on the register, through a schools programme for example, with their registration becoming active on their 18th birthday;
- (ii) specific provision for people with no fixed address e.g. people experiencing homelessness; and
- (iii) 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.

These proposals were generally welcomed with questions very much focussed on clarifying the practical steps to implement them.

- While clarity and consistency of approach on people with no fixed address would be welcomed, questions on how to assign a polling district for example or a location to receive polling cards etc were raised.
- How would anonymous registration work? How would it be restricted? How to protect the data of those concerned in the wider registration process?

- Early registration largely welcomed – few issues raised here, notable that voter.ie already provides for this. Some local authorities already have a schools programme and are finding them effective.

**At the feedback** session the Department highlighted the fact that these proposals would require detailed engagement with specific stakeholder groups to identify the issues faced by individual groups and whether these options would successfully or adequately address those issues. The experience of other countries in implementing these reforms will also be taken into account.

Other suggestions for reform submitted by franchise teams included:

- Certifying power of Gardaí should be moved to local authorities
- A reform of the Claims Process
- A longer gap between the close of the Register for applications and the poll date.
- Public representatives not to be provided with copies of the register.
- Only one Form should be required for Postal voting applications with tick boxes for different categories.

In relation to a proposal for new and/or consolidated categories of postal vote, the Department clarified that the scope of this modernisation project is on the registration process. It will not consider eligibility criteria; rather it will focus on the means of satisfying and demonstrating those criteria; the process by which eligible individuals engage in the registration process and the creation, management and maintenance of the register itself.

### **Accuracy and comprehensiveness**

The consultation paper asked questions about how Franchise teams currently gather information to compile and update the register including through the canvas and other means. The responses showed that fieldworkers are still used by the majority, emigrants being cited by one local authority as a key demographic that is very difficult to identify without quality fieldwork. Views on the effectiveness of that process vary significantly, with quality of fieldworkers (experience, training etc) being a key factor. Many noted the difficulty in attracting fieldworkers in the current market.

Issues in carrying out this work included: lack of access – new security gates on homes and apartment blocks make it difficult for fieldworkers to gain access in rural and urban areas; in addition, people don't want to share information on doorstep, some noted an increase in wariness this year, possibly due to greater awareness around GDPR; and there are concerns about the accuracy of data provided by one individual for an entire household.

Some local authorities do engage in specific targeting of particular areas or demographics for example new estates, new LA tenancies, or third level colleges in September/October. Postal canvas carried out by some LAs, generally found very low rates of return (10-15%).

Suggestions included: greater need for national campaigns, use of social media, targeting of specific groups, registration drives at different locations – shopping centres, libraries. The difficulties in gathering eircodes was highlighted too as many don't know their eircodes.

In addition, authorities were asked what other information sources they think might be of use in compiling the register. Responses included:

- Death events website, RIP.ie
- Jury summons letters returned
- Other areas in the Local Authority – HAP, RAS etc

- An Post – address changes but also local knowledge
- Googlemaps
- More social media advertising generally
- Issuing of forms to schools (requires early registration)
- Using marked registers to follow up
- PPSNs and related DEASP databases (limited access)
- MPRNs, GPRNs
- Local Auctioneers encouraging new owners/tenants to update details
- A designated officer in each polling station on polling day to record all the inaccuracies, omissions, deletions and returning them for correction to the Registration Department.

**At the feedback session** these suggestions were acknowledged and the potential for support from the centre in some areas was raised – for example, a more high profile national campaign when fieldwork is being carried out could help people to be aware that fieldworkers will be calling, perhaps making them more likely to engage. The potential for an app to assist in the work was also mentioned as the administrative burden of carrying through fieldworker inputs to the system was identified as a significant administrative task. Such an app could also help to identify eircodes.

On a postal canvas, the Department pointed to research carried out by the Revenue Commissioners and the Department of Employment Affairs and Social Protection in relation to maximising engagement with letters and the potential for learning to be applied in production of templates for letters seeking engagement with the registration process.

### Implementation

**From the consultation paper:** *The current proposals are based on a continuous improvement of the register over time rather than a proposal to start from a ‘clean slate’, which would avoid shocks to the system but could also take more time. What do you see as the benefits and risks of such an approach and what steps could be taken during implementation to ensure the best outcome?*

The vast majority in favour of continuous improvement, while acknowledging the risks involved of carrying inaccuracies – data cleaning will be central to the success of this process. The benefits of a “clean slate” approach were acknowledged too, particularly speed and accuracy but the costs and risks of disenfranchisement appeared to outweigh those benefits for most. Some respondents also pointed to the fact that some changes would apply over time e.g. while online services may become available it would take time for people to engage. Other reforms would be more immediate – for example, once appropriately planned and set up, a rolling register would be immediately effective with no dual process. Leading from that respondents were clear that the project should make available in a clear and accessible form, supported by public awareness campaigns:

- *Clear timetables for the project and implementation*
- *Details of any transition period to be publicised well in advance*
- *Clear steps that can be checked and measured for success*

Examples were given of SUSI, MyPay and eHEG for different models of changeovers that worked.

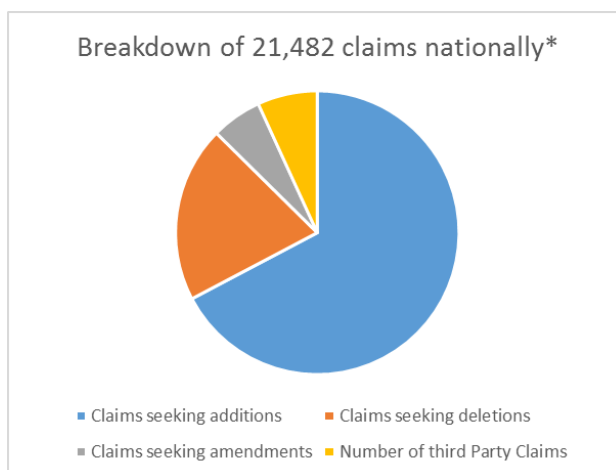
There were many references to the need for a large scale public awareness/engagement campaign to build confidence and transparency; remove any fears and dispel any confusion or incorrect assumptions that might arise. The importance of testing to ensure new proposals are accessible and usable by all, e.g. rural and urban areas and for all demographic groups was also mentioned.

## Statistics

Statistics were sought in relation to two areas: additions and deletions in preparing the register and the claims process.

### *Additions and Deletions*

The sources of additions and deletions in preparing the register were sought in order to try to assess how the register is built up and the breakdown between entries added from the previous supplement, as a result of new RFA forms, and other sources. Perhaps due to the nature of the questions asked and some apparent confusion arising as there was no electoral event in one of the years referred to, combined with a number of respondents indicating that they don't have that kind of break down, the responses vary too much across local authorities to allow any meaningful comparison and therefore do not provide any additional insights. The efforts of most Franchise teams in responding to this question are acknowledged and this will be a useful lesson for future surveys both in highlighting the importance of ensuring the clarity of questions and the need to identify if there are particular reports available to franchise teams that can be used to provide the information and the nature of reports that should be available in any future system to enable detailed reporting.



### *Claims*

In relation to claims however, figures were provided by most franchise teams and support comments made both in the survey and at the feedback session.

Some 21,400 claims were lodged in respect of the 2018/2019 draft register. The breakdown is shown in the chart. It isn't fully reliable as there were differences in how "third party" claims were identified with some respondents including fieldworker's inputs or those coming

from elected representatives and others only including individuals making claims. In addition, some respondents did not provide a third party figure, which again may be attributable to insufficient clarity in the question.

**At the feedback session** the calls for reform to the claims process already referred to in some of the survey responses were repeated. In the discussion that followed, many were of the view that the claims process could be improved. The process was seen as intimidating and confusing for people and secondly that the rulings were largely perfunctory with claimants not attending and the nature of the claims being straightforward in almost all cases, requiring little in the way of actual judgement. Given that the majority of claims were seeking addition or deletion, the question was raised as to why these applications couldn't simply be submitted to Local Authority franchise teams for consideration and appropriate action. This might still leave room for a claims process or some similar engagement with the county registrar in rare, controversial cases, should they arise – though no one in the room raised any such cases and the consensus appeared to be that claims were very straightforward applications for addition, deletion or correction. Third party claims were often family members correcting information for an elderly relative for example. Consultation with County Registrars would be useful to inform any proposals on the process.

## The edited register

The consultation paper sought to gather figures relating to the sale of the edited register and the views of franchise teams on retaining, reforming or removing provision for it. Responses showed that 27 copies of the edited register were provided nationally in the last 3 years.

The respondents were overwhelmingly in favour of removal of provision for the edited register. The reasoning was clear and repeated by most: the register should be for electoral purposes only; people don't understand the edited register, including that it can be sold to any third party who asks for it. When they do understand they opt-out and as a result there are very few entries on the edited register meaning demand is very low. Ultimately the provision causes a lot of work for very little, if any, benefit, with many considering it an outdated approach not in line with modern values on data protection etc.

## Additional comments

Franchise teams were also asked for any additional comments either in relation to the proposals, the process or the consultation itself. Those that responded in the main welcomed the process, with some pressing for urgent implementation, and highlighted the importance of meaningful consultation and that inputs provided should be appropriately considered and reflected in revision of documents. A number referred to the need for legislative change. There were also calls for more training and guidance for franchise teams.

**At the feedback session**, two particular comments were highlighted as they demonstrate the issues in terms of both efficiency and effectiveness and describe clearly not only the driver for change but also the benefits of that change both in terms of administration and for the public.

*The proposal to modernise the register of elector process is very welcome as the quality of the finished product does not reflect the work and effort*

***A modernised register is needed to reflect and cope with the increased mobility of population and move more online in keeping with citizens' needs.***

## Voter.ie presentation

The policy and legislative work being done in the context of the modernisation project will ultimately also require a technical solution. Voter.ie, developed by the Dublin Authorities provides an example of what is possible and will allow for lessons to be learned in advance of considering the national roll-out of a other solution as part of the wider modernisation process.

**At the feedback session**, Natasha Sheehan of Dublin City Council, who is the project co-ordinator of the voter.ie project gave a presentation regarding the system.

By way of background, the initial project group was established as far back as 2011 to improve the voter registration process using Dublin City Council's Register as a starting point. Its remit of improving the registration process was to be informed by the themes of accuracy, efficiency, ease of use and reduction of costs.

There were 3 phases of the project: Analysis; Development and Piloting.

The system contains 2 main elements:

- The first is a Back-Office central database element. Currently this is live in 3 of the 4 Dublin local authorities and is aimed to go live in South Dublin Co. Co. in November. In essence,



each LA maintains the data within its own area of remit. Each individual LA can check the data of other LAs for duplicate entries etc, but can only amend the data for its own area of remit. The system is designed to be used within the constraints of the current electoral legislation, but is capable of being tailored to account for amendments to legislation. The *benefits* of this element were outlined as:

- A consistent approach across all the LAs involved.
  - Improved accuracy – duplicate entries could be addressed (especially important among the neighbouring metropolitan Dublin LAs) – thus increasing accuracy over time.
  - Transfer of voters across the LAs was more efficient and simplified – a record of a voters history was also available.
  - There were automatic uploads when amendments were required – e.g for deceased persons.
  - An electronic records was available to staff – with easy upload of historical forms
  - There was increased functionality - regarding producing statistical reports and also for issues such as searching for an elector's details on polling day.
- The Second element, an Electoral Portal, is currently in development stage. This will involve an online registration method as an optional alternative to the paper-based application form process. It still contains an identification process (e.g. for new citizens registering). There is also a back-office check included to verify any changes inputted. The *benefits* forecast for this second element included:
    - Security, accuracy and quality of data – secure use of PPSN
    - Scalability (providing for more LAs to be users) & functionality (providing for new features) can increase
    - The ability to access quickly accurate and up to date information
    - Reduction of back-office workload – this will improve incrementally more and more over time
    - An enhanced service to the public

Voter.ie is an elector-based system, as opposed to the current household or address based system – and postal and special categories of voter are not yet included as more than one person needs to currently verify these categories (e.g. – a member of An Garda Síochána or a doctor).

## Communications

**At the feedback session** a brief outline of the communications plan for the project and the forthcoming public consultation was provided. Key messages will include:

- The register will be improved over time rather than replaced
- There are issues but the overall system works
- Consultation purpose is to set out proposals, ask the questions, not to provide answers at this time
- Focus of the reform programme is to strike the right balance between security, integrity, comprehensiveness and ease of use – *so everyone's views matter*

The public consultation will be notified via targeted media, press releases; the Department's own social media (including seeking assistance in spreading the word from Local Authorities and other stakeholders); stakeholder engagement to share information on the process, establish clear lines of contact and ensure that every effort is made to make as many people and affected groups as possible aware of the process. An advertising campaign will support these efforts. The overall aim is to kick-start national engagement on what could be very significant reforms to our electoral registration process.

## Next steps

The Department agreed to circulate the report of the consultation to include both the report on the survey outcomes and any issues arising from discussions at the feedback session.

The Public consultation documentation will be prepared to reflect the inputs received. It is planned to launch the consultation in late autumn.

## Recommendations/Actions arising

In addition to the specific inputs from the survey in relation to the individual proposals, which will be used to update and develop the policy proposals to be put to public consultation, a number of additional issues were raised at the feedback session and these will be considered and followed up on in the coming months.

- Further meetings of franchise teams is something that will be considered, at a minimum, for the duration of this project to ensure timely information sharing.
- While accepting that Registration Authorities are the data controllers in relation to the register, some additional guidance from the centre should be considered on GDPR and its implications for the electoral registration process and the management of the register.
- GDPR compliance should be a key focus in the re-design of forms and any new form(s) should explain what the electoral register can and cannot be used for and who has access to it in addition to simplifying and streamlining the process.
- The potential for an app to assist in the work was also mentioned as the administrative burden of carrying through fieldworker inputs to the system was identified as a significant administrative task. Such an app could also help to identify eircodes.
- On a postal canvas, the Department pointed to research carried out by the Revenue Commissioners and the Department of Employment Affairs and Social Protection in relation to maximising engagement with letters and the potential for learning to be applied in production of templates for letters seeking engagement with the registration process.
- Given that the majority of claims were seeking addition or deletion, the question was raised as to why these applications couldn't simply be submitted to franchise teams for consideration and action as appropriate. This might still leave room for a claims process or engagement with the county registrar in rare, controversial cases, should they arise. Consultation with County Registrars would be useful to inform any proposals on the process.