



Individual Electoral Registration Impact Assessment

Presented to Parliament
by the Deputy Prime Minister
by Command of Her Majesty

June 2011

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This publication is available for download at www.official-documents.gov.uk.
This document is also available from our website at www.cabinet-office.gsi.gov.uk

ISBN: 9870101810920

Printed in the UK by The Stationery Office Limited
on behalf of the Controller of Her Majesty's Stationery Office

ID 2438367 07/11 12710 19585

Printed on paper containing 75% recycled fibre content minimum.

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Title: Individual Electoral Registration Lead department or agency: Cabinet Office Other departments or agencies:	Impact Assessment (IA)
	IA No:
	Date: 08/04/2011
	Stage: Development/Options
	Source of intervention: Domestic
	Type of measure: Primary legislation
	Contact for enquiries: Sanjeet Bhumber - 0207 271 6211

Summary: Intervention and Options

What is the problem under consideration? Why is government intervention necessary?

There is a widely held view that the current system for registration is vulnerable to fraud and a public perception that this allows electoral fraud to occur. The Government is therefore proposing legislation that will replace the relevant sections of the Political Parties and Elections Act 2009 (PPE Act) introduced during the last Parliament. This will speed up the implementation and introduce Individual Electoral Registration (IER) within the life of the current Parliament (in 2014) and help to rebuild public confidence in the security of electoral registration. It will also take steps to improve the completeness of the register, and address the increasingly outdated household system of electoral registration.

What are the policy objectives and the intended effects?

The objective is to speed up the introduction of IER in Great Britain during this Parliament to ensure that electoral registration is trusted and secure. Success will be measured by a decline in fraudulent registration after 2014 and an increase in public confidence in the security of electoral registration. IER should improve the accuracy of the register, allow people to register in different ways, and whilst registration will not be compulsory, will allow us to take steps to address the completeness of the register.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Option 0 - Do nothing - No primary legislation (base case) - no commencement of the PPE Act therefore no change to current process for electoral registration.

Option 1 - Implementation of IER under the PPE Act

Option 2 - Speed up implementation of IER in 2014 - no voluntary phase - saving £74.5m and implementing in time for the 2015 General Election (preferred option - justification provided in the Evidence Base)

Will the policy be reviewed? It will be reviewed. **If applicable, set review date:** 06/2016

What is the basis for this review? PIR. **If applicable, set sunset clause date:** Month/Year


Are there arrangements in place that will allow a systematic collection of monitoring information for future policy review?

Yes

Ministerial Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:

 Date: 29-6-2011

Summary: Analysis and Evidence

Policy Option 1

Description: PPE Act Implementation

Price Base Year 2011	PV Base Year 2011	Time Period Years	Net Benefit (Present Value (PV)) (£m)		
			Low: -293.2	High: -324.3	Best Estimate: -293.2

COSTS (£m)	Total Transition (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	229.6	5	31.8*	334.7
High	242.9		36.4*	365.8
Best Estimate	229.6		31.8*	334.7

Description and scale of key monetised costs by 'main affected groups'

Costs are: £229.6-£242.9m from 2011-2015 (£13-15.4m: data matching, £74.5-£77.8m: voluntary phase, £85.5m: year 1 canvass, £8.7m: IT, £35.3-£42.9m: verification, £3.9m: public information, £8.1m: staff and admin, £0.6m: research). Net costs when taking monetised benefits into account are £182.0-£195.3m. Ongoing net change to costs are £31.8-£36.4m (£3.2-£5.5m: data matching, £1.2m: IT, £3.2-£5.5m: verification, £4m: rolling registration, £20.2m: annual canvass). *average post implementation

Other key non-monetised costs by 'main affected groups'

These estimates have been calculated using current registration costs, extrapolating the change from collecting information from 23 million households to approximately 45 million individuals and are net of current costs. The Electoral Commission has responsibility for the public information campaign to advise people of the changes to electoral registration. The cost of this campaign is not included here and is not part of the Cabinet Office programme.

BENEFITS (£m)	Total Transition (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	47.6		0	41.5
High	47.6		0	41.5
Best Estimate	47.6		0	41.5

Description and scale of key monetised benefits by 'main affected groups'

In year one of implementation, a benefit of £47.6m gained by not implementing a full household canvass in conjunction with an individual write-out. Possible monetised benefits could be gained by efficiencies in areas including new channels for registration (e.g. online) and potential switch off of the annual canvass, however these would require legislation. Policy decisions on these areas are yet to be made and would be evidence based.

Other key non-monetised benefits by 'main affected groups'

This option avoids IER coming into force prior to the 2015 General Election, as in practice this would not come into effect until Autumn 2015 at the earliest. There are benefits gained in terms of tackling fraud, however these would be realised later than for Option 2. New registrations would be verified from 2015 at the earliest, with no entries removed from the register until 2017.

Key assumptions/sensitivities/risks

Discount rate (%) 3.5

Data matching - national rollout would require primary legislation.

Use of alternative channels – while this is being explored, cannot guarantee that local authorities will deploy options available, however business case for certain channels, especially online, are likely to be compelling. These would not be possible until 2016 at earliest, therefore have no impact on costs at present and would also require legislation. Response rates - Difficult to determine response rates during voluntary phase which could increase costs of compulsory implementation. IT investment - investment in IT systems for data matching and verification would not be possible during the voluntary phase given the uncertainty around the compulsory phase, could increase future costs and development schedules.

Direct impact on business (Equivalent Annual) £m):			In scope of OIOO?	Measure qualifies as
Costs: 0	Benefits: 0	Net: 0	No	NA

Enforcement, Implementation and Wider Impacts

What is the geographic coverage of the policy/option?	Great Britain				
From what date will the policy be implemented?	July 2014				
Which organisation(s) will enforce the policy?	Cabinet Office, Electoral Commission, Local Authorities				
What is the annual change in enforcement cost (£m)?	N/A				
Does enforcement comply with Hampton principles?	Yes				
Does implementation go beyond minimum EU requirements?	No				
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)	Traded: N/A		Non-traded: N/A		
Does the proposal have an impact on competition?	No				
What proportion (%) of Total PV costs/benefits is directly attributable to primary legislation, if applicable?	Costs: 100		Benefits: 100		
Distribution of annual cost (%) by organisation size (excl. Transition) (Constant Price)	Micro	< 20	Small	Medium	Large
Are any of these organisations exempt?	No	No	No	No	No

Specific Impact Tests: Checklist

Set out in the table below where information on any SITs undertaken as part of the analysis of the policy options can be found in the evidence base. For guidance on how to complete each test, double-click on the link for the guidance provided by the relevant department.

Please note this checklist is not intended to list each and every statutory consideration that departments should take into account when deciding which policy option to follow. It is the responsibility of departments to make sure that their duties are complied with.

Does your policy option/proposal have an impact on...?	Impact	Page ref within IA
Statutory equality duties ¹ Statutory Equality Duties Impact Test guidance	Yes	23
Economic impacts		
Competition Competition Assessment Impact Test guidance	No	19
Small firms Small Firms Impact Test guidance	No	19
Environmental impacts		
Greenhouse gas assessment Greenhouse Gas Assessment Impact Test guidance	Yes	19
Wider environmental issues Wider Environmental Issues Impact Test guidance	No	20
Social impacts		
Health and well-being Health and Well-being Impact Test guidance	No	20
Human rights Human Rights Impact Test guidance	No	20
Justice system Justice Impact Test guidance	No	20
Rural proofing Rural Proofing Impact Test guidance	No	20
Sustainable development Sustainable Development Impact Test guidance	No	20

¹ Public bodies including Whitehall departments are required to consider the impact of their policies and measures on race, disability and gender. It is intended to extend this consideration requirement under the Equality Act 2010 to cover age, sexual orientation, religion or belief and gender reassignment from April 2011 (to Great Britain only). The Toolkit provides advice on statutory equality duties for public authorities with a remit in Northern Ireland.

Summary: Analysis and Evidence

Policy Option 2

Description: IER Implementation in 2014 – no voluntary phase (preferred option)

Price Base Year 2011	PV Base Year 2011	Time Period Years	Net Benefit (Present Value (PV)) (£m)		
			Low: -243.3	High: -273.9	Best Estimate: -243.3

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	147.2	31.8*	286.3
High	155.9	36.4*	316.8
Best Estimate	147.2	31.8*	286.3

Description and scale of key monetised costs by 'main affected groups'

Costs are: £147.2-£155.9m from 2011-2015 (£14.1-£17.0m: data matching, £85.5m: 2014 canvass, £5.2m: IT, £32.3-£38.1m: verification, £8.1m: staff and admin, £0.6m: research, £1.4m: public information). Net costs when taking monetised benefits into account are £99.6-£108.3m. The ongoing net change to costs are £31.8-£36.4m (includes £3.2-£5.5m: data matching, £4m: in year registrations, £1.2m: IT, £3.2-£5.5m: verification, £20.2m: annual canvass from 2015 onwards). *average post implementation

Other key non-monetised costs by 'main affected groups'

These estimates have been calculated using current registration costs, extrapolating the change from collecting information from 23 million households to approximately 45 million individuals and are net of current costs. The Electoral Commission has responsibility for the public information campaign to advise people of the changes to electoral registration. The cost of this campaign is not included here and are not part of the Cabinet Office programme.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	47.6	0	42.9
High	47.6	0	42.9
Best Estimate	47.6	0	42.9

Description and scale of key monetised benefits by 'main affected groups'

In year one of implementation, a benefit of £47.6m gained by not implementing a household canvass in conjunction with an individual write-out. Possible monetised benefits could be gained by efficiencies in areas including new channels for registration (e.g. online) and potential switch off of the annual canvass, however these would not be possible until after transition to IER is completed, 2016 at the earliest. Policy decisions on these areas are yet to be made and will be evidence based.

Other key non-monetised benefits by 'main affected groups'

This option presents a simpler process, which will limit confusion. It reinforces the principle of individual registration, using an individual transaction as the primary means of constructing the first electoral register under IER in 2014. This option allows the canvass in 2014 to be comfortably completed before the General Election period in 2015, and uses a carry forward provision to help people manage the transition to IER.

Key assumptions/sensitivities/risks

Discount rate (%) 3.5

Data matching - national rollout is dependent upon the outcomes from the data matching pilot schemes. Use of alternative channels – while this is being explored, cannot guarantee that local authorities will deploy options available, however business case for certain channels, especially online, are likely to be compelling. These would not be possible until 2015 at earliest, therefore have no impact on costs at present. Difficult to determine response rates in 2014 - no comparator to estimate and a lower response rate drives higher costs.

Direct impact on business (Equivalent Annual) £m):			In scope of OIOO?	Measure qualifies as
Costs: 0	Benefits: 0	Net: 0	No	NA

Enforcement, Implementation and Wider Impacts

What is the geographic coverage of the policy/option?	Great Britain				
From what date will the policy be implemented?	01/07/2014				
Which organisation(s) will enforce the policy?	Cabinet Office, Electoral Commission, Local Authorities				
What is the annual change in enforcement cost (£m)?					
Does enforcement comply with Hampton principles?	Yes				
Does implementation go beyond minimum EU requirements?	No				
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)	Traded: N/A		Non-traded: N/A		
Does the proposal have an impact on competition?	No				
What proportion (%) of Total PV costs/benefits is directly attributable to primary legislation, if applicable?	Costs: 100		Benefits: 100		
Distribution of annual cost (%) by organisation size (excl. Transition) (Constant Price)	Micro	< 20	Small	Medium	Large
Are any of these organisations exempt?	No	No	No	No	No

Specific Impact Tests: Checklist

Set out in the table below where information on any SITs undertaken as part of the analysis of the policy options can be found in the evidence base. For guidance on how to complete each test, double-click on the link for the guidance provided by the relevant department.

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Social impacts		
Health and well-being Health and Well-being Impact Test guidance	No	20
Human rights Human Rights Impact Test guidance	No	20
Justice system Justice Impact Test guidance	No	20
Rural proofing Rural Proofing Impact Test guidance	No	20
Sustainable development Sustainable Development Impact Test guidance	No	20

¹ Public bodies including Whitehall departments are required to consider the impact of their policies and measures on race, disability and gender. It is intended to extend this consideration requirement under the Equality Act 2010 to cover age, sexual orientation, religion or belief and gender reassignment from April 2011 (to Great Britain only). The Toolkit provides advice on statutory equality duties for public authorities with a remit in Northern Ireland.

Evidence Base (for summary sheets) – Notes

Use this space to set out the relevant references, evidence, analysis and detailed narrative from which you have generated your policy options or proposal. Please fill in **References** section.

References

Include the links to relevant legislation and publications, such as public impact assessments of earlier stages (e.g. Consultation, Final, Enactment) and those of the matching IN or OUTs measures.

No.	Legislation or publication
1	Impact Assessment of proposals for the introduction of individual registration – Royal Assent Stage of Political Parties and Elections Act 2009 – available at http://www.ialibrary.berr.gov.uk .
2	Political Parties and Elections Act 2009 – available at http://www.legislation.gov.uk/ukpga/2009/12/contents
3	
4	

+ Add another row

Evidence Base

Ensure that the information in this section provides clear evidence of the information provided in the summary pages of this form (recommended maximum of 30 pages). Complete the **Annual profile of monetised costs and benefits** (transition and recurring) below over the life of the preferred policy (use the spreadsheet attached if the period is longer than 10 years).

The spreadsheet also contains an emission changes table that you will need to fill in if your measure has an impact on greenhouse gas emissions.

Annual profile of monetised costs and benefits* - (£m) constant prices

	Y ₀	Y ₁	Y ₂	Y ₃	Y ₄	Y ₅	Y ₆	Y ₇	Y ₈	Y ₉
Transition costs	3.3	3.6	9.6	130.7						
Annual recurring cost					31.8	31.8	31.8	31.8	31.8	31.8
Total annual costs	3.3	3.6	9.6	130.7	31.8	31.8	31.8	31.8	31.8	31.8
Transition benefits				47.6						
Annual recurring benefits										
Total annual benefits	0	0	0	47.6	0	0	0	0	0	0

* For non-monetised benefits please see summary pages and main evidence base section



Microsoft Office
Excel Worksheet

- spreadsheet includes profile for best estimate of Option 1 and Option 2.

Evidence Base (for summary sheets)

Introduction and Background

Political Reform is a key part of the Coalition's Programme for Government and includes a number of far reaching reforms, including: five-year fixed-term parliaments, fewer, more equal-sized constituencies, proposals for a wholly or mainly elected House of Lords, the power for voters to dismiss MPs found guilty of serious wrongdoing and a referendum on voting reform for Westminster elections.

A complete and accurate electoral register is critical to rebuilding trust in our political system and to the overall success of the Political Reform agenda. These objectives are defined as follows:

Complete: Every person who is entitled to have an entry in an electoral register is registered if they choose to do so

Accurate: None of the information relating to any person registered is false or incorrect, intentionally or otherwise

The coalition agreement contains a promise to '*reduce electoral fraud by speeding up the implementation of individual electoral registration*' (IER). This is a major change to our system of electoral registration; it will improve accuracy, requiring electors to register to vote individually rather than by household. In doing so, an individual must provide information which will be used to verify their entitlement to be included in the electoral register. Only once their entitlement has been verified can a person be added to the register.

This change will take steps to make the system less vulnerable to fraud and provide an opportunity to support the completeness of the register by tackling under-registration through the testing of data matching schemes. These will allow EROs to compare their registers against other public databases to identify people missing from the register or entries that are inaccurate or fraudulent. There are around 20 pilot schemes which between them will use combinations of data from public authorities including the Department for Work and Pensions, the Department for Transport, the Department for Education, HM Revenue and Customs, the Department for Business, Innovation and Skills and the Ministry of Defence. The pilots will be independently evaluated by the Electoral Commission.

The provisions in the Political Parties and Elections Act 2009 (PPE Act) provide for the phased introduction of IER on a voluntary basis from 2010 at the earliest, although in practice it would not allow IER to become compulsory before the 2015 general election. Although the PPE Act has received Royal Assent, if the relevant sections are not commenced, no change would occur to the current system for registering to vote. The current proposal would see the implementation of IER occur in 2014, prior to the 2015 general election and the voluntary phase outlined in the PPE Act abolished. Data matching pilot schemes began in June 2011.

All costs in this IA are in addition to the £82.8m current cost of electoral registration (Source: *The Cost of Electoral Administration in Great Britain - June 2010* – The Electoral Commission). This includes £32.3m outside of the annual canvass period, and £47.6m for the annual household canvass.

Rationale and Policy Objective

The key drivers for implementing individual electoral registration are:

Individual responsibility for electoral registration

The system for registering to vote in Britain has remained similar since the early twentieth century. Electors register to vote through the annual canvass of households conducted by

the electoral registration officer (ERO) in the autumn of each year, although since 2001 electors have also been able to register through rolling registration at any time throughout the year.

An annual household canvass is conducted each autumn in order to capture everyone who is living in the property. The canvass forms are pre-populated with the information from the previous register and the head of each household is required to either amend or confirm the information (done by post or through a door to door canvasser if changes are to be made, can be done by internet or telephone if no changes are required). The register is compiled from this information and published by 1 December each year. The majority of the process is postal based with door to door canvass work carried out in order to increase response rates. Outside of the canvass period, people can register using the rolling registration process, where they complete a form individually and return it to the ERO. These are processed and updates to the register are published each month, until the next annual canvass. Currently, both the canvass and the rolling registration processes are trust based with no proof of entitlement required.

Aside from the other drivers for the move to IER, it is desirable as a matter of principle that a person's ability to vote is not dependent on whether another person has placed their name on a form for them. The household registration system is increasingly outdated and Britain is almost unique in continuing this system. Whilst individuals can register in year using the rolling registration system, a small proportion of people do so (approximately 2% per annum) and households are required by law to respond to the annual household canvass. The system must be simple and more convenient for people to register to vote.

Tackling Fraud

While data available on electoral fraud indicates that it is rare, any fraud in the system undermines public confidence. Despite the improvements introduced by the Electoral Administration Act 2006, there remain a significant number of people who perceive fraud to be a problem (40% of people surveyed for the Electoral Commission's Winter Research 2010¹) and this can have a corrosive effect on trust in our political system. We think the current system of electoral registration is unacceptably exposed to the risk of fraud.

Observers of UK elections have highlighted concerns about the registration system for a number of years. In their Election Assessment Mission Report on the General Election 2010 (published 9 July 2010), the Office for Democratic Institutions and Human Rights (OSCE/ODIHR) described the voter registration system in Great Britain as the weakest link of the electoral process due to the absence of safeguards against fictitious registrations. They recommended that:

“Consideration should be given to introducing an identification requirement for voters when applying for registration as a safeguard against fraudulent registration.”

In 2007, a report by the Committee for Standards in Public Life recommended that a system of IER should be introduced for the rest of the UK following the next General Election or by 2010, arguing that it would make the register more accurate. Since 2003 the Electoral Commission has recommended the introduction of IER, in order to improve the quality of the electoral register². The Association of Electoral Administrators (AEA), Society for Local Authority Chief Executives (SOLACE) and the European Commission for Democracy through Law (the Venice Commission) have also made representations calling for the introduction of IER.

Maintaining a more accurate and complete register will deliver benefits beyond addressing the potential for fraud in elections. The full register is already made available under current legislation to a number of government organisations for statistical and crime prevention purposes. In addition, the register is also supplied to credit reference agencies and is an

¹ http://www.electoralcommission.org.uk/___data/assets/pdf_file/0005/108869/2010-Public-Opinion-Winter-Research-Topline.pdf

² The Electoral Registration Process: Report and recommendations June 2003

important tool used by financial institutions in the UK to verify a person's identity when processing an application for credit or opening a bank account.

According to the UK's Fraud Prevention Service – CIFAS, in 2010, 217,385 frauds were recorded to the National Fraud Database by CIFAS member organisations, 47% of which were identity fraud. Whilst this is not in any way an indication of fraud within the electoral roll, it is evidence of the reliance that is placed on the accuracy of the electoral register to enable identify fraud (although it should be borne in mind that this will not be the only check carried out to confirm whether an application for credit is genuine or fraudulent).

Getting on the electoral register has been assessed as an important enabler in identity fraud, which is in turn an enabler for financial crime, exploiting the additional robustness that presence on the electoral register confers on an identity. Once a false identity is viewed as legitimately residing at an address, as recorded in the electoral register, it then aids the commission of other frauds that involve a credit or identity check.

Intelligence shows that individual criminals and organised crime groups exploit electoral registration to increase the apparent robustness of false identities, which in turn enable a range of criminal activities. These activities include, but are not limited to, mortgage fraud, fraudulently applying for banking products and/or passing credit checks, and fraudulently gaining access to state benefits. Metropolitan Police Service (MPS) and National Fraud Initiative data match analysis of 29,000 strands of identity data found on forged and counterfeit documents collated under Operation AMBERHILL (such as names, addresses) showed that 13,214 (45.6%) of these were positive matches on electoral roll entries and could potentially be used to facilitate fraud. The lack of robust verification processes for electoral registration, make it an area of activity for criminals of high reward and low risk.

IER should help to root out those who attempt to register fictitious people with the aim of committing financial fraud, thus giving financial institutions a greater degree of confidence that a person is genuine. Ongoing discussions with the Serious Organised Crime Agency, the Association of Chief Police Officers and the Metropolitan Police are helping us to understand the value fraudsters place on getting on the electoral roll and how we can protect IER from potential attacks.

Improving Electoral Registration

In September 2005, the Electoral Commission published research into under registration in Great Britain, *Understanding Electoral Registration*. The 'register check' with the Office for National Statistics (ONS) involved constructing a sample of records for England and Wales using the 2001 Census and the Labour Force Survey, and then comparing population data with registration data having taken eligibility into account. According to ONS, the best estimate for non-registration among the eligible household population in England and Wales at 15 October 2000 (the qualifying date for the February 2001 register) was between 8% and 9%. Based on these figures they estimated that 3.5 million people across England and Wales were eligible to be on the register at their main residence but were missing from it in 2000.

The Commission's 'register check' also allowed for an estimate of levels of non-registration among different socio-economic groups and in different areas. In 2000, non-registration was higher in metropolitan areas, particularly inner London. Young people, especially attainees (16-17 year olds who are eligible to register in anticipation of turning 18 years of age), were less likely to be registered, as were those who lived away from home. Among all age groups, men were less likely to be registered than women. People from some minority ethnic groups had a relatively high likelihood of non-registration, but rates among Asians (those from Indian, Pakistani and Bangladeshi communities) and black Caribbean people were similar to those for white people. Non registration was also highest among private renters, the unemployed, those without qualifications and those in non-permanent employment.

Some key figures on registration rates for various groups, taken from the report, are:

Estimated non-registration among selected groups, yr. 2000		
Group	% not registered	Base
16–17-year-olds	28	479
18–24-year-olds	16	2,211
Inner London	18	985
West Midlands	4	2,498
Indian	6	413
Black Caribbean	9	225
Black African	37	116
At same address six months prior to qualifying date	6	22,794
At different address six months prior to qualifying date	33	1,169
Students	22	575
Own property outright	3	6,979
Renting from private landlord or letting agency	27	1,269

* This table provides a good estimate of the picture but the precise percentages need to be treated with some caution in some areas due to the smaller sample sizes.

More recently, the Commission's Report: *The completeness and accuracy of electoral registers in Great Britain*, published in March 2010, indicates that the completeness of the registers was estimated at 93.5% in 1980, 91–3% in 1990 and 91–2% in 2000. By examining evidence from electoral statistics and surveys of levels of response to the annual canvass of electors, the report found that there was a decline in registration levels from the late 1990s to 2006. The registers have since stabilised, although it is likely that the completeness of the registers has declined further since the last national estimate in 2000.

The estimated figure of 3.5 million people missing from the electoral register is widely used in Parliament, in the absence of any more accurate data. This year, the Electoral Commission is conducting research into electoral registration levels in a project funded by the Cabinet Office, which will provide a robust estimate of completeness and accuracy.

IER presents an opportunity to tackle the problems of under-registration longer term by devising measures which identify people who are entitled to vote, but are not on the register. The current legislation makes provision for the testing of Data Matching schemes, to see which public databases can best improve the completeness and accuracy of the register and whether this could form part of the overall approach to the maintenance and accuracy of the electoral register.

We can also address this problem by looking at the overall design of the system of electoral registration to see how it can better maintain the accuracy and completeness of the register, as well as deliver the service more efficiently. IER may provide a means of supporting online registration and the integration of electoral registration with the delivery of other online services, which may make for a more efficient and effective system. This will be considered as part of the further development of the implementation model.

Supporting Other Elements of the Political Reform Package

The move towards IER will support a number of other elements of the political reform package by enhancing the accuracy and completeness, and therefore credibility, of the electoral register.

Scope

The proposal covers the implementation of IER across Great Britain. IER was implemented in Northern Ireland in 2002.

Cost Benefit Analysis

This impact assessment identifies both monetised and non-monetised impacts on individuals and groups in Great Britain, with the aim of understanding what the overall impact to society might be from implementing the proposal. The costs and benefits of each option (options 1 and 2) are compared to the do nothing option (option 0). Impact assessments place a strong emphasis on valuing costs and benefits in monetary terms (including estimating the value of goods and services that are not traded). However, there are important aspects that cannot sensibly be monetised. These might include how the proposal impacts differently on particular groups in society or changes in equity or fairness, either positive or negative.

Option 0 – Do nothing (no primary legislation)

Description

Base case: this option would see no further primary legislation relating to the implementation of IER as it would not be necessary. Although the PPE Act has received Royal Assent, if the relevant sections are not commenced, no change would occur to the current system for registering to vote. It may however be necessary to repeal the sections of the PPE Act that would not be enacted.

Costs

There is no change in monetary costs involved with this option, as the current system of electoral registration would continue.

The current cost of electoral registration is £82.8m per annum, £47.6m of this is expenditure on the annual household canvass and £32.3m on electoral registration outside of the canvass period (Source: *The Cost of Electoral Administration in Great Britain - June 2010* – The Electoral Commission). Therefore, this cost would remain the same under this option.

There remain a significant number of people who perceive fraud to be a problem (40% of people surveyed for the Electoral Commission's Winter Research 2010). Without change, these concerns are likely to persist and erode trust in the electoral system over time. While electoral fraud is rare, any fraud undermines public confidence. The current system of electoral registration is unacceptably exposed to this risk and this is why the coalition government agreed to speed up the introduction of individual registration to improve security.

The levels of electoral registration are unlikely to change significantly under this option, but without further action, and in a period of declining resources, the current problems of under-registration are likely to continue.

Benefits

The current system has been in place for many years and people are familiar with it. Whilst the level of electoral registration in the UK at around 90% compares well internationally, evidence suggests that a significant number of people are missing from the electoral register.

Option 1: Implementation of IER under the PPE Act

Description

The PPE Act 2009 sets out a statutory timetable for the implementation of IER. From 2011 to 2015 identifiers will be supplied by electors on a voluntary basis but there will be no distinction drawn between those who have and have not supplied them, in terms of inclusion on the register. Household registration would effectively remain in place, with a base of verification data built up alongside it. The Electoral Commission would produce annual reports on the effectiveness of registration during this period, indicating whether any changes are necessary to enable the shift to IER. In 2014, the Electoral Commission's annual report would contain a recommendation as to whether the registration system is ready to move to compulsory IER. Should this recommendation be positive, and if Parliamentary approval by affirmative resolution was obtained, then IER would become compulsory from 2015.

From Autumn 2015, all "new" registrations (e.g. people moving house and re-registering, or anyone entirely new to the register) would have to provide information to have their entitlement to be on the register verified. Anyone already on the register in Autumn 2015 who did not provide this information would be carried forward for two further years, to 2017. From that point, there would be full compulsion, and full individual registration.

The operation of the annual canvass and individual registration is assumed to be the same as that described in Option 2 - in 2015, a special type of canvass would take place with a mix of individual invitations and canvass forms. From 2016 onwards, each household would again be canvassed, and any changes would be confirmed with the individuals in question.

Costs

This is the most expensive option for implementation at £182.0m - £195.3m transition costs (consisting of £229.6m-£242.9m costs and £47.6 monetised benefits); £31.8m-£36.4m net additional annual costs – note the net annual costs are the same as option 2) with the voluntary collection of additional information alongside the annual canvass costing £74.5m-£77.8m. The range of costs reflects the range of implementation options for data matching and entitlement verification and the unknown factor of response rates.

This option would also mean that the benefits of IER would not be realised until 2015 at the earliest. Although the arrangements for the move to IER are designed to fully mitigate the risk of transitioning to a new system, there is an alternative to familiarise people with the new requirements as set out in option 2 (the carry forward provisions). It may be possible to delay the start of the voluntary phase to reduce these costs, although the savings are not significant (a 2 year voluntary phase will reduce costs of voluntary collection to £47.2m – £67m) and there are no other significant benefits to doing this and it does not mean that compulsory IER would be in place any sooner.

Consideration was given to speeding up the implementation of IER under this option. However, further legislation would be required to change the timescales for implementation, potentially delaying the introduction of the compulsory stage. Significant issues identified with conducting a voluntary phase of collection would also need to be addressed in such legislation (most importantly the issue that personal information would be collected that would not be used for verification for many years subsequent). This would require significant amendments to primary legislation.

Low Estimate - Cost of Implementing Option 1 (constant prices)

Component	Programme Cost (£m)	Net change in ongoing cost (£m)
Voluntary Phase	74.5	0
Data Matching	13	3.2
Year one data collection under IER	85.5	-
In year rolling registration	-	4
IT	8.7	1.2
Verification	35.3	3.2
Public information	3.9	0
Staff and administration	8.1	-
Research	0.6	-
Annual household canvass	(47.6) - benefit	20.2
TOTAL	182.0	31.8

The drivers, risks and assumptions for the low estimate are:

Voluntary phase – a high response rate from electors during the voluntary phase would have driven lower costs overall as fewer individuals would need to be contacted year on year, therefore decreasing printing and postage costs. It is difficult to determine response rates in 2014 as there is no comparator available. Ipsos MORI research commissioned by the Electoral Commission has indicated that many people are not averse to providing the additional information³. The Electoral Commission Winter Survey 2009 indicated 74% would not react differently if asked to provide their National Insurance Number as part of an application to register, and 35% believe they are already required to. There is a need for further research to identify and target those groups that are at risk of not being registered in 2014 and beyond.

Data matching – Electoral Registration Officers may be able to identify potential unregistered electors in future by accessing data sets and following up with individuals to invite them to register. However, national rollout of this is dependent upon the outcomes of the data matching pilot schemes which are being run in 2011 and would require further legislation. The costs allocated to data matching are for the purposes of running and evaluating the pilots and follow on development costs. If data matching was to be rolled out nationally this would likely incur further costs, however these are not yet known.

Year one data collection - The costings assume that the individual write out in 2015 will occur by mail with response rates similar to the current canvass process. These estimates have been calculated using current registration costs and extrapolating the change from current collection of information from 23 million households to approximately 45 million individuals. This has taken into account costs such as printing forms, postage and staff resource. This cost would be offset by the £47.6m benefit from not conducting a household canvass in this year. The household canvass would continue to be conducted from 2016 onwards.

In year rolling registration – It is estimated that the cost of processing registration forms received from electors in year (outside of the annual canvass period) is £4m, which includes postage and verification processes. Due to the canvass being in place from 2016 onwards, it is assumed here that the same proportion of the population will use the rolling registration process, which is currently approximately 2% of registered electors.

IT – This represents the estimated cost to make changes to the current electoral management system software used by electoral registration officers and the ongoing licensing and maintenance of these systems.

Verification – As with data matching, there is as yet no infrastructure solution for the verification of entitlement. These costs are based on lower end estimates from a project of

³ Research into the Collection of Personal Identifiers – Qualitative research study conducted by Ipsos MORI for the Electoral Commission

similar size and scale, however the requirements for individual electoral registration will emerge as the business model and system design are developed.

Public Information - The Electoral Commission has responsibility for the public information campaign to advise people of the changes to electoral registration. The cost of this campaign has not yet been estimated, however a comprehensive strategy will be developed as policy and business processes are finalised. The costs included here cover consultations and information leaflets only.

Staff and administration – This represents the staff and administration cost to the Cabinet Office. It should be noted that this is a maximum estimate, as the cost of running a programme to implement option 1 is unknown.

Research – There is a need to conduct research to provide information throughout the implementation, including this year, when the Electoral Commission is conducting research into electoral registration levels in a project funded by the Cabinet Office, which will provide a robust estimate of completeness and accuracy.

Annual household canvass – As mentioned under year one data collected, there is a benefit of £47.6m during the transition period. Ongoing costs for the annual household canvass are estimated to be an additional £20m, which includes the cost of inviting individuals to register to vote where changes are indicated via the household canvass, and verification processes.

High Estimate - Cost of Implementing Option 1 (constant prices)

Component	Programme Cost (£m)	Net change in ongoing cost (£m)
Voluntary Phase	77.8	0
Data Matching	15.4	5.5
Year one data collection under IER	85.5	-
In year rolling registration	-	4
IT	8.7	1.2
Verification	42.9	5.5
Public information	3.9	0
Staff and administration	8.1	-
Research	0.6	-
Annual household canvass	(47.6) - benefit	20.2
TOTAL	195.3	36.4

The drivers, risks and assumptions for the high estimate are the same as for the low estimate except for the following:

Voluntary Phase – A low response rate from electors during the voluntary phase would have driven higher costs overall as more individuals would need to be contacted year on year, therefore increasing printing and postage costs.

Data Matching and Verification - These costs are based on higher end estimates from a project of similar size and scale, however the requirements for individual electoral registration will emerge as the business model and system design are developed.

The best estimate of the net present value for this option is -£293.2m (it should be noted that this is the estimate for 10 years of implementing the policy and includes 5 transition years and annual ongoing costs for this period). Due to the unknown nature of data matching rollout and response rates, the low estimate is also considered the best estimate. Implementation options that present the most value for money will be chosen, however, there is currently no comparator to estimate response rates and the national rollout of data matching is dependent upon the outcomes from the data matching pilot schemes being run in 2011.

Benefits

This option, as for option 2, provides a monetised benefit of £47.6m from not conducting a full annual household canvass in 2015 (an individual write-out to each elector would take

place instead, and for households where there is no currently registered elector, or where the ERO is aware that the entry on the register is no longer correct, a form will be sent to the household to identify potential eligible electors). This is a one off benefit as each household would again be canvassed from 2016 onwards.

This option will see benefits, but significantly later than Option 2. New applications for electoral registration would require verification from 2015 at the earliest, and no entries would be removed from the register before 2017.

This option would avoid the risks associated with transitioning to a new system prior to the 2015 General Election as those who have not registered voluntarily under IER by that time would remain on the register. The voluntary phase would continue until the Electoral Commission assessed the implementation and until a further vote in Parliament took place. A move to the compulsory phase would occur in 2015 at the earliest.

Option 2: Implementation of IER in 2014 – no voluntary phase (preferred option)

Description

This option would dispense with the voluntary phase of IER and move straight to IER from 1 July 2014 with full verification of an applicant's entitlement before someone can be added to the register.

Each registered elector as at 1 July 2014 would be contacted and invited to register under IER from 1 July 2014. An annual household data collection exercise would be retained from 2015 onwards, requiring Electoral Registration Officers to send household enquiry forms to households annually. An alternative approach would be to ask each person individually to update their information annually, however this would not only be more costly (from contacting each person, rather than each household) but such an approach would be likely to catch fewer changes each year as only those registered the previous year would be contacted, rather than each household.

In place of the voluntary phase, a transitional carry forward arrangement would be put in place to help people manage the transition to the new system. Those electors who fail to register under IER may be carried forward for one year; this would mean that a 2015 election could be fought on a register which could still contain names of people who have not registered under IER, although IER would be compulsory for any new registrations (including late registrations) and it would be a requirement for any absent vote, existing or new application, to be supported by a verified individual registration. Data matching pilot schemes are being trialled to support the completeness and accuracy of the register.

An alternative option to the 2014 individual write-out has been considered and discounted, which involved each property receiving a household enquiry form, and based on the response to this each individual would be invited to register individually (as is currently proposed for 2015 onwards and described above). Whilst this would ensure the register was as accurate as possible for the write-out, it has a number of disadvantages:

- Possible confusion amongst electors arising from having a two stage process – many electors may think they are registered via the household enquiry form which would depress response rates to the write-out. This will also add time and cost to the process.
- A two stage process will take longer and would be unlikely to be completed in time to allow publication of the register in December 2014. A delay in publication would raise a risk to the General Election campaign for 2015.
- Household enquiry forms will be completed by one person for others in the household and therefore not in line with the principle of individuals taking responsibility for their own registration.
- As this alternative would involve a full household enquiry process in addition to an individual write-out, it would cost an estimated £85.5m net of current costs (compared to £37.9m net cost for an individual write-out alone).

Whilst some of these points also apply in 2015, the impact is far less that year as only new electors, those who have still to register under IER, or those who change their registration on the household enquiry form e.g. home movers will be requested to complete an individual registration form.

Costs

This option would significantly reduce transition costs to £99.6m - £108.3m (consisting of £147.2m-£155.9m costs and £47.6m monetised benefits), but would bring the same net additional annual costs of £31.8m - £36.4m to the costs of registration. Current registration cost is £82.8m (in 2008-09) which includes the current cost of the annual canvass of £47.6m.

Current estimates for implementing IER (met by the Government) are: £99.6m-£108.3m from 2011-2015 (includes £14.1-17.0m - data matching, £85.5m - 2014 canvass, £5.2m - IT, £32.3 -£38.1m - verification, £1.4m - public consultation, £8.1m – staff and administration, £0.6m – research, £47.6m benefit from not conducting annual household canvass in 2014). The ongoing net change to costs for electoral registration are £31.8m-£36.4m (includes £3.2-£5.5m - data matching, £4m - in year registrations, £1.2m - IT, £3.2-£5.5m - verification, and £20.2 - annual canvass from 2015 onwards). The best estimate for the transition period is £108.3m (£155.9m costs less £47.6m monetised benefits).

Low Estimate - Cost of Implementing Option 2 (constant prices)

Component	Transition Cost (£m)	Net change in ongoing cost (£m)
Data Matching	14.1	3.2
Year one data collection under IER	85.5	-
In year rolling registration	-	4
IT	5.2	1.2
Verification	32.3	3.2
Public information	1.4	-
Staff and administration	8.1	-
Research	0.6	-
Annual household canvass	(47.6) - benefit	20.2
TOTAL	99.6	31.8

The drivers, risks and assumptions for the low estimate are similar to Option 1:

Data matching – Electoral Registration Officers may be able to identify potential unregistered electors in future by accessing data sets and following up with individuals to invite them to register, however, national rollout of this is dependent upon the outcomes of the data matching pilot schemes which are being run in 2011. The £14.1m estimated cost for data matching is for the purposes of running and evaluating the pilots and follow on development costs. If data matching was to be rolled out nationally this would likely incur further costs, however these are not yet known. These costs are based on lower end estimates from a project of similar size and scale, however the requirements for individual electoral registration will emerge as the business model and system design are developed.

Year one data collection - The costings assume that the individual write out in 2014 will occur by mail with response rates similar to the current canvass process. These estimates have been calculated using current registration costs and extrapolating the change from current collection of information from 23 million households to approximately 45 million individuals. This has taken into account costs such as printing forms, postage and staff resource. This cost would be offset by the £47.6m benefit from not conducting a household canvass in this year in addition to the full individual write-out. The household canvass

would continue to be conducted from 2015 onwards. There are likely to be further efficiencies which can be gained by exploring alternative channels for registration (including online) and through data matching (pending the outcomes of the data matching pilot schemes). Local authorities will be in control of which options are deployed depending on the market and the needs of their local area but the business case for certain channels, especially online, is likely to be compelling. Currently this does not have an impact on the costs presented. A post implementation review following the transition to the new system will assist in determining the future approach to the annual canvass, which may also create further efficiencies. It is difficult to determine response rates in 2014 as there is no comparator available. Ipsos MORI research commissioned by the Electoral Commission has indicated that many people are not averse to providing additional information⁴. The Electoral Commission Winter Survey 2009⁵ indicated 74% would not react differently if asked to provide their National Insurance Number as part of an application to register and 35% believe they are already required to. There is a need for further research to identify and target those groups that are at risk of not being registered in 2014 and beyond.

In year rolling registration – It is estimated that the cost of processing registration forms received from electors in year (outside of the annual canvass period) is £4m, which includes postage and verification processes. Due to the canvass being in place from 2015 onwards, it is assumed here that the same proportion of the population will use the rolling registration process, which is currently approximately 2% of registered electors.

IT – This represents the estimated cost to make changes to the current electoral management system software used by electoral registration officers and the ongoing licensing and maintenance of these systems.

Verification – As with data matching, there is as yet no infrastructure solution for the verification of entitlement. These costs are based on lower end estimates from a project of similar size and scale, however the requirements for individual electoral registration will emerge as the business model and system design are developed.

Public Information - The Electoral Commission has responsibility for the public information campaign to advise people of the changes to electoral registration. The cost of this campaign has not yet been estimated, however a comprehensive strategy will be developed as policy and business processes are finalised. The costs included here cover consultations and information leaflets only. The costs under option 2 are less than those under option 1 due to the nature of the implementation (a 4 year voluntary phase plus a change to compulsory individual registration requires more public awareness than one change to individual electoral registration as under option 2).

Staff and administration – This represents the staff and administration cost to the Cabinet Office.

Research – There is a need to conduct research to provide information throughout the implementation, including this year, when the Electoral Commission is conducting research into electoral registration levels in a project funded by the Cabinet Office, which will provide a robust estimate of completeness and accuracy.

Annual household canvass – As mentioned under year one data collection, there is a benefit of £47.6m during the transition period. Ongoing costs for the annual household canvass are estimated to be an additional £20m, which includes the cost of inviting individuals to register to vote where changes are indicated via the household canvass, and verification processes.

High Estimate - Cost of Implementing Option 2 (constant prices)

Component	Transition Cost (£m)	Net change in ongoing cost (£m)
Data Matching	17.0	5.5
Year one data collection under IER	85.5	-
In year rolling registration	-	4
IT	5.2	1.2

⁴ Research into the Collection of Personal Identifiers – Qualitative research study conducted by Ipsos MORI for the Electoral Commission

⁵ Ipsos Mori for Electoral Commission – Winter Research 2009 Topline Results

Verification	38.1	5.5
Public information	1.4	-
Staff and administration	8	
Research	0.6	
Annual household canvass	(47.6) - benefit	20.2
TOTAL	108.3	36.4

The drivers, risks and assumptions for the high estimate are the same as for the low estimate except for the following:

Data Matching and Verification - These costs are based on higher end estimates from a project of similar size and scale, however the requirements for individual electoral registration will emerge as the business model and system design are developed.

Year one data collection - The June 2014 register is likely to contain inaccuracies. Electoral Commission research suggests a 10% degradation of accuracy across the year following the conclusion of the annual canvass. Combined with the current estimated 10% gap in completeness, this means that approximately 20% of people eligible to register may not be invited to register individually under the first write-out in 2014. Specific steps will need to be taken to invite attainees (16-17 year olds) and home movers who would normally be captured by the household canvass to register. It is proposed that all properties with no registered electors will be sent a household enquiry form in 2014 and that an insert will be included with every write out requesting details of others in the household who may be eligible to register. ONS data suggests there are approximately 4.5 million home moves in a year, around 225,000 attainees each year, in addition to the estimated 3.5 million people missing from the register. Reaching these electors will bring additional costs to the process (although some of this may be covered by the data matching processes), however as previously mentioned, the exploration of alternative channels for registration may also assist in offsetting this cost.

The best estimate of the net present value for this option is -£243.3m (it should be noted that this is the estimate for 10 years of implementing the policy and includes 4 transition years and annual ongoing costs for this period). Due to the unknown nature of data matching rollout and response rates, the low estimate is also considered the best estimate. Implementation options that present the most value for money will be chosen, however, there is currently no comparator to estimate response rates and the national rollout of data matching is dependent upon the outcomes from the data matching pilot schemes being run in 2011.

Benefits

This option, as for option 1, provides a monetised benefit of £47.6m from not conducting a full annual household canvass in 2014 (an individual write-out to each elector will take place instead, and for households where there is no currently registered elector, or where the ERO is aware that the entry on the register is no longer correct, a form will be sent to the household to identify potential eligible electors).

This option provides a simpler 'one stage' process in 2014 for the majority of electors (an estimated 90%) who do not change their details year on year. This will limit confusion amongst electors and will allow Electoral Registration Officers to focus their efforts on reaching the remaining electors who are not registered. This also reduces the cost of this option, as the individual write-out is offset by the cost of the current annual household canvass (£47.6m).

This proposal uses an individual transaction as the primary means of constructing the first ever register under IER in 2014. This reinforces the principle of individual registration that everyone should take responsibility for their own registration rather than be reliant on a third person in their household. The proposal allows the 2014 canvass to be completed comfortably prior to the beginning of the 2015 General Election period. It also assists in tackling potential electoral fraud from 2014 onwards for new registrations and absent votes (as opposed to option 1 where this may not occur until 2015 at the earliest, or 2017 at the latest). The proposed transitional carry forward arrangements will help manage the transition

to the new system prior to the 2015 General Election. The household enquiries from 2015 onwards and the development of data matching will assist in continuing to improve the completeness and accuracy of the register.

Specific Impact Tests

Equality Impact Assessment

An equality impact assessment has been completed for the proposal to implement individual electoral registration and is at Annex 2.

Competition Assessment

It is not considered that there will be any impact on competition from the proposal to implement individual electoral registration.

Small Firms Impact Test

It is not considered that there will be any new regulatory burden or impact on small businesses from proposals to implement Individual Electoral Registration unless some businesses are brought into a new market. This will continue to be assessed throughout the policy development and implementation.

Carbon Assessment

It is likely that there will be an increase in carbon emissions in 2014 as a result of policy options 1 and 2. This is because there will be approximately 45 million individual electoral registration application forms produced, as opposed to approximately 23 million household forms currently, as each individual will be required to register individually.

Under policy option 2, all electors will be required to have their application verified prior to being added to the electoral register. It is expected that a small proportion of applications will not be able to be verified on the information provided, or alternatively, electors may not have the information requested. In these circumstances, it is possible electors may need to travel to their local authority or another designated point to provide additional documentation. As some of these people will travel by public transport or private vehicles this may contribute to the increase in carbon emissions.

Consideration is being given to the use of alternative channels to register to vote, including online, which will assist in reducing the carbon impact of the policy. In the longer term this could also see a reduction in carbon emissions if online registration proves more popular than conventional postal methods.

Once business processes for the policy have been finally determined, a full carbon emissions assessment will be conducted, including the monetary impact of the changes.

Wider Environmental Impacts

In 2014, there will be a greater number of electoral registration forms generated and processed (approximately 45 million individual forms, as opposed to approximately 23 million household forms). This will lead to an impact in the cost of the paper and printing resource, as well as an increase in secure waste management. This will be considered as part of the carbon impact assessment once final business processes have been developed.

Health Impact Assessment

It is not considered that there will be any impact on health and well-being from proposals to implement individual electoral registration.

Human Rights

In the Government's view, the proposal to implement individual electoral registration is compatible with the European Convention on Human Rights and provides an improvement by giving individuals the responsibility of registering themselves to vote, rather than their registration being reliant on a third person completing a form on their behalf. The impact on human rights will continue to be assessed during the Bill stages to ensure alertness to the discrimination of anyone in the exercise of a Convention right.

Justice Impact Test

The Government will put secure handling of personal data at the heart of the new system. We are therefore proposing to introduce a new offence in regulations relating to the disclosure of any information provided for verification purposes - whether that is provided by the applicant, or provided by another authority in response to a verification check. This would ensure robust protection for personal information appropriate to the sensitivity of the information concerned. This offence would carry an appropriate penalty consistent with the similar offences relating to the unlawful disclosure of information under provisions in the PPE Act 2009. The level at which the penalty is set reflects the penalty for the unlawful disclosure of personal information held by the Department for Work and Pensions.

This additional offence is proposed as the unlawful disclosure of any personal data provided for the purpose of registering to vote could have a negative impact on the electoral process resulting in less people registering and voting at elections, creating serious consequences for the democratic process. The impact on the justice system has been assessed by the Ministry of Justice as being minimal.

Rural Proofing

It is not considered that there will be any significant impact on rural areas from the proposals to implement individual electoral registration as it does not reduce the level of access that a person has to the electoral registration process.

Consideration is being given to the use of alternative channels to register to vote, including online and face to face, which would provide alternative means of registering to vote, including for those in rural areas. It is noted that those in rural areas will be dispersed and further from economic centres, and may have reduced access to public transport and broadband ICT, therefore the current postal channel will remain available to all electors.

Sustainable Development

It is considered that this proposal contributes towards two of the principles of sustainable development that the government has committed to. These are ensuring a strong, healthy and just society; and promoting good governance.

Privacy Impact Assessment (a Ministry of Justice Specific Impact Test)

The proposal for the implementation of individual electoral registration includes the use of and access to personal data of electors therefore a full privacy impact assessment has been conducted. It is considered that there will be an improvement to the privacy of individuals in that they will not be required to share information with other members of the household in order to register to vote. The privacy impact assessment addresses the issues associated with the collection of additional personal information and is at Annex 4.

Annexes

Annex 1 should be used to set out the Post Implementation Review Plan as detailed below. Further annexes may be added where the Specific Impact Tests yield information relevant to an overall understanding of policy options.

Annex 1: Post Implementation Review (PIR) Plan

A PIR should be undertaken, usually three to five years after implementation of the policy, but exceptionally a longer period may be more appropriate. If the policy is subject to a sunset clause, the review should be carried out sufficiently early that any renewal or amendment to legislation can be enacted before the expiry date. A PIR should examine the extent to which the implemented regulations have achieved their objectives, assess their costs and benefits and identify whether they are having any unintended consequences. Please set out the PIR Plan as detailed below. If there is no plan to do a PIR please provide reasons below.

Basis of the review: [The basis of the review could be statutory (forming part of the legislation), i.e. a sunset clause or a duty to review, or there could be a political commitment to review (PIR)];

Commitment to review.

Review objective: [Is it intended as a proportionate check that regulation is operating as expected to tackle the problem of concern?; or as a wider exploration of the policy approach taken?; or as a link from policy objective to outcome?]

The objective of the review will be to check that the policy is operating as expected to tackle the issues of completeness and accuracy of the register. It will also inform the future approach to registration including channels for registration and the annual canvass.

Review approach and rationale: [e.g. describe here the review approach (in-depth evaluation, scope review of monitoring data, scan of stakeholder views, etc.) and the rationale that made choosing such an approach]

The approach to the review is to be developed.

Baseline: [The current (baseline) position against which the change introduced by the legislation can be measured]

Baseline information is in the process of being determined and will be used to benchmark the change introduced by the proposal.

Success criteria: [Criteria showing achievement of the policy objectives as set out in the final impact assessment; criteria for modifying or replacing the policy if it does not achieve its objectives]

Success will be measured by a decline in fraudulent registrations after 2014, an increase in public confidence in the security of electoral registration, and measures of the completeness and accuracy of the register.

Monitoring information arrangements: [Provide further details of the planned/existing arrangements in place that will allow a systematic collection of monitoring information for future policy review]

The arrangements to be put in place to allow collection of monitoring information is to be developed. It should be noted that the Electoral Commission will also play a role in monitoring and reviewing the implementation of the proposal.

Reasons for not planning a review: [If there is no plan to do a PIR please provide reasons here]

Not applicable.

Annex 2: Equality Impact Assessment

Individual Electoral Registration

Equality Impact Assessment

Introduction

This document identifies likely equality issues arising from introducing individual electoral registration in Great Britain, assessing the likely impact on:

- Disability
- Race
- Gender
- Gender reassignment
- Age
- Religion or belief
- Sexual orientation
- Pregnancy and maternity
- Caring responsibilities

The document also sets out the consultations that have already taken place in order to assist with development of the proposal and assessing the impacts.

Description of the proposed legislation being assessed

The coalition agreement contains a promise to '*reduce electoral fraud by speeding up the implementation of individual electoral registration*' (IER). This is a major change to our system of electoral registration; it will improve accuracy, requiring electors to register to vote individually rather than by household. In doing so, an individual must provide information which will be used to verify their entitlement to be included in the electoral register. Only once their entitlement has been verified can a person be added to the register.

This change will tackle the potential for fraudulent registrations. IER also provides an opportunity to take steps to tackle under-registration. We are trialling data matching schemes that will allow EROs to compare their registers against other public databases. It is hoped that this will help identify people not currently registered to vote, as well as providing a means of checking the accuracy of the register.

The provisions in the Political Parties and Elections Act 2009 (PPE Act) provide for the phased introduction of IER on a voluntary basis from 2010 at the earliest, although in practice it would not allow IER to become compulsory before the 2015 general election. The current proposal would dispense with the voluntary phase of IER and move straight to compulsory IER in 2014 (to achieve the Coalition goal of speeding up implementation) with full verification of entitlement before someone can be added to the register.

After an initial individual application under IER from each elector in 2014, an annual household data collection exercise will be retained from 2015 onwards, requiring Electoral Registration Officers to send household enquiry forms to households annually, and any changes confirmed with the individuals

concerned. An alternative approach that was considered but has not been taken forward would be to ask each person individually to update their information annually, however this would not only be more costly (from contacting each person, rather than each household) but such an approach would be likely to catch fewer changes each year as only those registered the previous year would be contacted, rather than the household.

In place of the voluntary phase, a transitional carry forward arrangement will be put in place to help people manage the transition to the new system. Those electors who fail to register under IER may be carried forward for up to 2 years; this may mean that a 2015 election could be fought on a register which could still contain names of people who have not registered under IER, although IER would be compulsory for any new registrations (including late registrations) and it would be a requirement for any absent vote, existing or new application, to be supported by an verified individual registration. Data matching schemes, which are being piloted from June 2011 would also continue to be developed to support the completeness and accuracy of the register and if they proved successful this would be in addition to an annual household data collection exercise.

What is your assessment of the equality impact of your proposals, including an assessment of the available evidence?

The arguments for and against any potential equality impacts resulting from the policy proposal have been assessed according to the best available evidence.

Individual Electoral Registration

The system for registering to vote in Britain has remained constant since the early twentieth century. Electors register to vote through the annual canvass of households conducted by the ERO in the autumn of each year, although since 2001 electors have also been able to register through rolling registration at any time. In mid 2009, the estimated population of Great Britain was 60 million¹. Of this, it is estimated that there were 4.3 million non-UK citizens, made up of 1.8 million EU nationals and 2.5 million from the rest of the world². It is estimated that 91% of the eligible population are registered to vote in Great Britain³. A small percentage, approximately 1 million people per year, use the rolling registration process to register outside of the canvass period.

Aside from the other drivers and benefits of the move to IER, it is a matter of principle that individuals should take responsibility for their registration and that a person's ability to vote is not dependent on whether another person has placed their name on a form for them. The household registration system is increasingly outdated and Britain is almost unique in continuing this system.

The move away from a household electoral registration system should have an overall positive impact on equality, providing each eligible individual with the right and responsibility to register themselves to vote, rather than being dependent on another member of the household. This should empower individuals to take greater ownership of their franchise.

This, however, will require a shift in behaviour if people are to take responsibility for their own registration. This will be supported by a strategy which includes a transitional carry-forward, publicity and targeted engagement that will make it as easy as possible for people to register, by providing increased opportunity and prompts that will help everyone adapt to the change.

Whilst the system will be as convenient and efficient as possible for all users, the impacts on the following groups of people have been particularly considered:

- Those currently under-represented on the register.
- Those who present a particular challenge in 2014.
- Those who have special requirements.

¹ *Population Estimates* – Office of National Statistics, June 2010.

² *Population Estimates* – Office of National Statistics, June 2010.

³ *The Completeness and Accuracy of Electoral Registers in Great Britain* – Electoral Commission, March 2010.

Groups Currently Under-Represented on the Register

In September 2005, the Electoral Commission published research into under registration in Great Britain, *Understanding Electoral Registration*. The ‘register check’ with the Office for National Statistics (ONS) involved constructing a sample of records for England and Wales using the 2001 Census and the Labour Force Survey, and then comparing population data with registration data having taken eligibility into account. According to ONS, the best estimate for non-registration among the eligible household population in England and Wales at 15 October 2000 (the qualifying date for the February 2001 register) was between 8% and 9%. Based on these figures they estimated that 3.5 million people across England and Wales were eligible to be on the register at their main residence but were missing from it in 2000.

The Commission’s ‘register check’ also allowed for an estimate of levels of non-registration among different socio-economic groups and in different areas. In 2000, non-registration was higher in metropolitan areas, particularly inner London. Young people, especially attainers, were less likely to be registered, as were those who lived away from home. Among all age groups, men were less likely to be registered than women. People from some minority ethnic groups had a relatively high likelihood of non-registration, but rates among Asians (those from Indian, Pakistani and Bangladeshi communities) and black Caribbean people were similar to those for white people. Non registration was also highest among private renters, the unemployed, those without qualifications and those in non-permanent employment:

Estimated non-registration among selected groups, yr. 2000		
Group	% not registered	Base
16–17-year-olds	28	479
18–24-year-olds	16	2,211
Inner London	18	985
West Midlands	4	2,498
Indian	6	413
Black Caribbean	9	225
Black African	37	116
At same address six months prior to qualifying date	6	22,794
At different address six months prior to qualifying date	33	1,169
Students	22	575
Own property outright	3	6,979
Renting from private landlord or letting agency	27	1,269

** This table provides a good estimate of the picture but the precise percentages need to be treated with some caution in some areas due to the smaller sample sizes.*

More recently, the Commission’s Report: *The completeness and accuracy of electoral registers in Great Britain*, published in March 2010, indicates that the completeness of the registers is estimated at 93.5% in 1980, 91–3% in 1990 and 91–2% in 2000. By examining evidence from electoral statistics and surveys of levels of response to the annual canvass of electors the report found that there was a decline in registration levels from the late 1990s to 2006 but the registers have since stabilised, although it is likely that the completeness of the registers has declined further since the last national estimate in 2000. The report indicates that there is higher than average under registration amongst certain groups. These include 17-24 year olds (56% not registered), private sector tenants (49%) and black and minority ethnic (BME) British residents (31%). Metropolitan areas, small towns and cities with high student populations

and coastal areas with population turnover and social deprivation are also likely to have large numbers of unregistered people.

The estimated figure of 3.5 million people missing from the electoral register is widely used in Parliament, in the absence of any more accurate data. As part of the work to tackle under-registration, the Electoral Commission is conducting research into electoral registration levels in a project funded by the Cabinet Office, which will provide a robust estimate of completeness and accuracy.

IER presents an opportunity to tackle the problems of under-registration longer term by devising measures which identify people who are entitled to vote, but are not on the register. The trialling of data matching schemes as well as exploring more targeted and innovative work to increase the representation of under-registered groups is being undertaken as part of the wider programme of work to support the accuracy and completeness of the electoral register. The Government is therefore taking steps to ensure that the voluntary act of registration is encouraged and promoted, including amongst groups that are currently under-represented.

We can also address this problem by looking at the overall design of the system of electoral registration to see how it can better maintain the accuracy and completeness of the register, as well as deliver the service more efficiently. IER may provide a means of supporting online registration and the integration of electoral registration with the delivery of other online services, which may make for a more efficient and effective system. This will be considered as part of the further development of the implementation model.

Consultations have commenced with a number of civic society groups who represent a variety of social groups that are currently under-represented on the register and that may be impacted by the policy including:

- Youth
- Aged
- Disability
- Black and Minority Ethnic

The objective of these consultations is to better understand the issues associated with these groups, how to better engage people in the process of individual electoral registration and how best to communicate the changes in order to help mitigate the risk of continued under-registration in these groups. The policy proposal also includes a carry forward provision so that those people who do not register under IER in 2014, will be carried forward to the following year to allow a further opportunity to register under IER before being dropped off the register.

There is also the need to be conscious of other groups such as those that are under-represented on the register through disengagement, being unaware of entitlements and responsibilities, or access difficulties, as well as making the system convenient and efficient for all users. An extensive communications campaign at the time of implementation will provide information about the changes to electoral registration in order to encourage registration.

Groups Presenting a Particular Challenge in 2014

During the annual refresh of the electoral register (i.e. the annual household canvass), approximately 10% of all entries are updated each year, consisting of three main groups of eligible electors:

- 16-17 year olds (who can be added to the register as attainers);
- People moving house (either into a new district or within the same district); and,
- People new to the country (non-UK citizens who have migrated, those that have recently become UK citizens, or returning UK citizens).

In 2014 a proportion of the eligible voting population will not be contacted through a proposed mail-out based on the June 2014 electoral register. These include attainers, home movers and those new to the country, but also include those who are eligible but were not registered in 2013. Figures of this group are not known but have been estimated at 3.5 million people for England and Wales.

- 16-17 year olds

This target group are unlikely to have had any prior exposure to the electoral registration or voting process, and until turning 16, are unlikely to have had any individual contact with public services (previous contact would likely have been as a dependant on their parents). As they are not included on any previous electoral registers prior to the implementation of individual registration, unless targeted they may not register, although the proposed duty on registration officers to contact potentially eligible people they may become aware of would cover this group.

- Moving house or overseas

People who move house form the largest group and effectively engaging these people will assist in providing a more accurate and complete register. There are approximately 4.5 million home moves per year. Alongside this, in 2009 371,000 people emigrated on a long term basis out of the UK, thereby potentially becoming eligible to register as overseas electors⁴.

- New to the country

In 2009, 203,790 people became British citizens⁵, with 567,000 long term migrants moving to the UK⁶ (of which, an unknown percentage will have a franchise).

613,000 NINOs were issued to non-UK nationals⁷, of which a percentage will have a franchise and form part of the group of long term migrants (therefore the statistics on migrants and NINOs should not be taken to be two separate groups).

The June 2014 register is likely to contain inaccuracies. Electoral Commission research suggests a 10% degradation of accuracy across the year following the conclusion of the annual canvass. Combined with the current estimated 10% gap in completeness, this means that approximately 20% of people eligible to re-register under IER may not be invited to register individually under the first write-out in 2014.

It is noted that there will be an effect on these groups, and measures are being taken to mitigate these impacts which along with current outreach activities, include trialling data matching schemes and public awareness campaigns which should help to reach affected groups. Specific steps will need to be taken to invite attainees and home movers who would normally be captured by the household canvass to register in 2014. Reaching these electors will bring additional costs to the process, however is an important and necessary step to ensure equality and the exploration of alternative channels for registration may assist in offsetting this cost.

Groups with Special Requirements

Impact on special category electors, including Service voters

This change to the electoral registration process affects all electors registering to vote in Great Britain, including special category and overseas electors. It is assessed that special category and overseas electors will not be negatively impacted by the proposal in terms of equality.

Other categories of electors, including Service voters, who are registered pursuant to declarations or special arrangements will not be required to provide the additional information until their declaration has expired. All new and subsequent applications will be required to register individually and be verified prior to being placed on the register. For Service personnel, the declaration is in force for 5 years after the application is approved by the Electoral Registration Officer. This is a transitional arrangement to ensure that additional barriers are not put in place for this special category of elector at the time of implementation.

We will also focus on tackling the low electoral registration rates for Service voters. There is concern that at present registration among service personnel is low and experience at the recent election illustrated

⁴ *Migration Statistics Quarterly Report* – Office of National Statistics, August 2010.

⁵ *British Citizenship Statistics, United Kingdom* – Home Office, 2009.

⁶ *Migration Statistics Quarterly Report* – Office of National Statistics, August 2010.

⁷ *Migration Statistics Quarterly Report* – Office of National Statistics, August 2010.

the practical difficulties of Service personnel exercising their votes while deployed overseas. While Service voters can register either as ordinary electors or by way of a Service declaration, levels of registration are low in comparison with the general population. The Ministry of Defence's Service Voter Survey 2008 estimated that 65% of service personnel were registered to vote, and amongst those personnel stationed overseas this fell to 48%. One of the data matching pilot schemes will be focussed on Service personnel in particular and the overall scheme design will look at how the electoral registration system can better support Service voters.

Impact on the elderly, disabled or those in care

It is noted that there may be an additional time burden placed on those in care or caring for others as each individual will now need to complete a form and provide additional information if they wish to register to vote.

The proposed policy for entitlement verification reflects the need to balance accessibility against security, whilst addressing completeness and accuracy and making electoral registration as convenient as possible. It is proposed that where data provided by an elector cannot be verified, or the data is unable to be provided e.g. a person does not have a National Insurance Number, an exceptions process would be in place that may require additional documentation or in certain circumstances face to face contact may be merited.

It is noted that the need for face to face contact may have an impact on particular groups of people such as those with particular disabilities, those in care or with caring responsibilities and those with mobility problems. It is anticipated that this will affect a small proportion of eligible electors and will be used as a last resort in order to verify entitlement. The ability to verify an elector's entitlement prior to adding them to the register is a key element for preventing registration fraud and so whilst all efforts will be made to reduce the impact on affected electors, this is a necessary part of the process.

Proposal for the 2015 annual canvass

The introduction of a household enquiry form for 2015 and subsequent years will ensure that the groups previously mentioned will again begin to be identified and be provided with the opportunity to register individually. The household enquiry form will also be used in 2014 to canvass households which are new properties or where no individuals are registered. There is no evidence to suggest that this policy would have adverse equality impacts over and above those already mentioned, and in fact they will be less as all members of the household should be identified through this process and then provided with the opportunity to register to vote individually.

What information gaps exist?

The report on The Completeness and Accuracy of Electoral Registers in Great Britain published by the Electoral Commission in March 2010 found that "under-registration is concentrated among specific social groups" as outlined in the above sections.

There is a need to better understand how to communicate with these specific groups and provide opportunities for them to register to vote. Therefore, we plan to regularly engage with groups that represent the interests of vulnerable people in our society to ensure the policy delivered does not create new barriers to registration.

We also plan to commission a national study to measure the completeness and accuracy of the registers in 2011 in order to provide a baseline which can be returned to both during and after implementation for development and assessment purposes.

What consultation and engagement has been done regarding this policy?

A number of consultations have taken place in order to develop and test the proposal and consider impacts on various social groups. These include:

- Programme Scoping Workshop – 25th September 2009
- New Dialogue on Data – Individual Electoral Registration – 23rd February 2010

- Improving Voter Registration – 24th January 2011

Please see attached Annex 3 for a list of invitees to these events.

Consultations, along with analysis of the data matching pilot scheme outcomes, are expected to continue to ensure that any potential equality impacts resulting from the policy proposal to implement individual electoral registration can be identified and mitigation strategies put in place and tested.

Liaison with other government departments who interact with target groups, particularly attainers and home-movers, has begun in order to explore alternative channels and opportunities to reach these groups.

Timescale for implementation

This policy will be implemented from 1 July 2014. Until this time, current electoral registration legislation and processes will remain in place.

Annex 3: Consultation Events - Invitees

Programme Scoping Workshop – 25th September 2009

The following organisations were invited to attend this event:

Electoral Reform Society
Liberty
Scope
Citizenship Foundation
Help the Aged
Rethink
Operation Black Vote
University of Liverpool
Unlock Democracy
Royal National Institute of Blind People
Equality Human Rights Commission
Open Rights Group
Citizens Advice Bureau
Refugee Council
Joseph Rowntree Reform Trust
UK Youth Parliament
University of Lancaster
Oxford University
University of Strathclyde
University College London
Electoral Commission
Electoral Registration Officers

New Dialogue on Data – Individual Electoral Registration – 23rd February 2010

The following organisations were invited to attend this event:

Liberty
Equality Human Rights Commission
Electoral Reform Society
Unlock Democracy
Open Rights Group
Scope
Citizenship Foundation
National Association of Citizens Advice Bureau
Help the Aged
Rethink
Runnymede Trust
Operation Black Vote
Royal National Institute of Blind People
MIND – National Association for Mental Health

Improving Voter Registration Event – 24th January 2011

The following organisations were invited to attend this event:

Electoral Reform Society
Liberty
Scope
Citizenship Foundation
Help the Aged
Rethink
Operation Black Vote
Unlock Democracy
Royal National Institute of Blind People
Open Rights Group
Joseph Rowntree Reform Trust
Shelter
Fawcett Society
Refuge
Runnymede Trust
MIND – National Association for Mental Health
Ethnic Minority Foundation
Muslim Youthnet
Institute for Citizenship
National Youth Agency
British Youth Council
Carnegie Young People Initiative
Youthnet
Demos
Fabian Society
Institute for Public Policy Research
Policy Exchange
Reform
Envision
ROTA - Race on the Agenda
National Children's Bureau
Children's Rights Alliance for England
Diana Award
Association of Charitable Foundations
Charity Trustee Networks
Community Service Volunteers
Consortium of Lesbian, Gay, Bisexual and Transgendered Voluntary and Community Organisation
Council of Ethnic Minority Voluntary Sector Organisations
Association of Chief Executive of Voluntary Organisations
National Association for Voluntary and Community Action
National Council for Voluntary Organisations
National Council for Voluntary Youth Services
TimeBank
Urban Forum
Voice4Change England
Volunteering England
Women's Resource Centre
Youth Action Network
V
Women's Royal Voluntary Service
YMCA England
Turning Point
Catch-22
Youth Commission for Social Enterprise

Annex 4: Privacy Impact Assessment

Executive Summary

Background

Individual Electoral Registration

The Coalition Agreement contains a promise to '*reduce electoral fraud by speeding up the implementation of individual electoral registration*' (IER). This is a major change to our system of electoral registration; it will improve accuracy, requiring electors to register to vote individually rather than by household. In doing so, an individual must provide information which will be used to verify their entitlement to be included in the electoral register. Only once their entitlement has been verified can a person be added to the register.

This change will take steps to make the system less vulnerable to fraud and provide an opportunity to support the completeness of the register by tackling under-registration through the testing of data matching schemes that will allow EROs to compare their registers against other public databases. It is hoped that this will help identify people not currently registered to vote, as well as providing a means of checking the accuracy of the register. National rollout of data matching will be conditional on the outcomes of these pilot schemes.

Objectives

The objective is to speed up the introduction of IER in Great Britain during this Parliament to ensure that electoral registration is trusted and secure. Success will be measured by a decline in fraudulent registration after 2014, and an increase in public confidence in the security of electoral registration. IER should improve the accuracy of the register to allow us to address the current level of completeness and help people currently missing to get on the register.

As identified in the Screening Process a Full Scale Privacy Impact Assessment (PIA) is required for implementation of Individual Electoral Registration. This report is the PIA for this initiative.

Consultations

This policy has and will continue to be tested through ongoing consultation with various key stakeholders, including the Information Commissioners Office, Electoral Commission, Association for Electoral Administrators, Society of Local Authority Chief Executives, Electoral Registration Officers and organisations concerned about privacy. Consultations have also taken place with the Metropolitan Police, Association of Chief Police Officers, Serious Organised Crime Agency, HM Revenue and Customs and the Department for Work and Pensions.

Findings

The PIA has found that there will be privacy impacts as a result of the implementation of IER due to the:

- Collection of additional personal data that electors are not currently required to provide.
- Transmission of data for the purposes of verifying an elector's entitlement before they are placed on the electoral register.
- Retention and disposal of personal data collected for the purposes of electoral registration increases the risk of unauthorised disclosure.

The Government is aware of the above impacts and the following mitigations are being put in place to address these:

- Additional personal data collected will not form part of the electoral register – the information currently captured on the register will remain the same.
- There will be no new national database created as a result of implementing IER.
- A data management policy is in development which will set out clear policy on the storage, use, transmission, retention and disposal of personal data.
- The solution for the storage and transmission of the personal data has not yet been determined, but the necessary design features to secure personal data will be a requirement.
- Continued engagement with key stakeholders to ensure security of personal data and appropriate risk and impact assessment and mitigation.
- Proposed new offence for the disclosure of personal data provided by an applicant in their electoral registration application, or the information provided by any entity in the verification process to any person not involved in the process.

It is important to note that any impacts will necessarily need to be balanced against security and fraud concerns and that both impact and mitigation strategies will continue to be developed.

Recommendation

It is recommended that further consultation with key stakeholders and the public is conducted to fully understand the privacy impacts and continue to develop appropriate mitigation strategies. It is intended that this PIA will be a living document and develop over the period of policy development and implementation.

Review Process

The draft legislation, White Paper and impact assessments will be open for comment until 14 October 2011. Analysis of material received during this period will be conducted and incorporated into the development of the PIA.

Introduction

Background

A Privacy Impact Assessment (PIA) is a process which helps assess privacy risks to individuals in the collection, use and disclosure of information. PIAs help identify privacy risks, foresee problems and bring forward solutions. The primary purpose of a PIA is to visibly demonstrate that an organisation acts responsibly in relation to privacy. The deliverables and benefits of undertaking a PIA can be summarised as follows:

- The identification and management of risk;
- Avoidance of unnecessary costs;
- Prevention of inadequate solutions;
- Avoiding loss of trust and reputation;
- Informing citizens and partners of the organisation's communications strategy;
- Meeting and exceeding legal requirements.

Objective

The objective of conducting this PIA is to identify any data protection issues with the proposed system of Individual Electoral Registration. It is important to remember that ultimately the focus of a PIA is compliance with the Data Protection Act (DPA). However, compliance with any other relevant legislation should also be considered.

Underlying principle

Data collection, sharing and testing must be undertaken within a clear legal framework with any intrusion upon an individuals' privacy to be kept to a minimum. The Electoral Registration Transformation Programme is undertaking this PIA to ensure this principle is met.

HMG requirement

The Data Handling Review, published in June 2008, states that all Departments will 'introduce Privacy Impact Assessments, which ensure that privacy issues are factored into plans from the start, and those planning services are clear about their aims. Similarly, information risk management will be considered as part of the Government's 'Gateway' reviews that monitor progress of the most important projects'. The Data Handling Review has now been subsumed into HMG Information Assurance Standard No 6 – Protecting Personal Information and Managing Information Risk. Accordingly, PIAs are to be carried out on Cabinet Office projects and policies that involve the processing of personal data.

PIA Process

The process for conducting a PIA is described by the Information Commissioner's Office as follows:

1. Initial assessment (i.e. the Screening Process) – Examines the project at an early stage, makes an initial assessment of privacy risk and decides which level of assessment¹ is necessary. This has been undertaken and the assessment is referenced in this report.
2. Where necessary, conduct, either:

¹ Full Scale PIA, Small Scale PIA or no PIA.

- Full-scale PIA – a more in-depth internal assessment of privacy risks and liabilities. It includes the need to identify stakeholders, analyse privacy risks, consults widely with stakeholders on privacy concerns and brings forward solutions to accept, mitigate or avoid them; or
- Small-scale PIA – Similar to a full-scale PIA, but is less formalised. Requires less exhaustive information gathering and analysis. More likely to be used when focusing on specific aspects of a project.
- Review – Sets out a timetable for reviewing actions taken as a result of a PIA and examines their effectiveness. Looks at new aspects of the project and assesses whether they should result in an updated PIA.

This report deals with the PIA for Individual Electoral Registration. The screening process identified that a Full Scale PIA is required.

Individual Electoral Registration

Individual Electoral Registration Overview

What is IER?

The Coalition Agreement contains a promise to '*reduce electoral fraud by speeding up the implementation of individual electoral registration*' (IER). This is a major change to our system of electoral registration; it will improve accuracy, requiring electors to register to vote individually rather than by household. In doing so, an individual must provide information which will be used to verify their entitlement to be included in the electoral register. Only once their entitlement has been verified can a person be added to the register. It must be noted that a person's ability or inability to present certain personal information for the purposes of verification is not a determining factor of their right to register, e.g. if a person does not have a National Insurance Number, it will not prevent them being able to register to vote as alternative methods of verification will be available.

This change will take steps to make the system less vulnerable to fraud and provide an opportunity to support the completeness of the register by tackling under-registration through the testing of data matching schemes that will allow EROs to compare their registers against other public databases. It is hoped that this will help identify people not currently registered to vote, as well as providing a means of checking the accuracy of the register. National rollout of data matching will be conditional on the outcomes of these pilot schemes.

The provisions in the Political Parties and Elections Act 2009 (PPE Act) provide for the phased introduction of IER. The current proposal would see the implementation of IER occur in 2014, prior to the 2015 general election, and the voluntary phase outlined in the PPE Act abolished. Data matching pilot schemes commenced in June 2011.

What is the main purpose for introducing IER?

The objective of speeding up the introduction of IER in Great Britain during this Parliament is to ensure that electoral registration is more trusted and secure at an earlier stage. Success will be measured by a decline in fraudulent registration after 2014 and an increase in public confidence in the security of electoral registration. IER should improve the accuracy of the register and allow us to address the current level of completeness and help people currently missing to get on the register.

Screening Process

A formal screening process was conducted on 30 March 2011 and identified that a full scale PIA should be undertaken. However, it must be noted that work to identify and mitigate privacy impacts has been underway since the policy began to be developed.

Previous Impact Assessments

A general small scale Impact Assessment dated 20 July 2009 was conducted for the Royal Assent stage of the Political Parties and Elections Act 2009. This provided an overview of the impacts of the previous government's proposals for the introduction of IER and included brief information regarding privacy impacts. This is available to view or download at <http://www.ialibrary.berr.gov.uk>.

Business case

What data will be collected?

The data that will be collected from each elector making an application under IER is:

- Full name (first name, middle name or initial(s), family name)
- Full residential address including postcode
- Nationality
- Declaration of truth – declaration that all information provided is true and correct.

- Date of birth (new requirement)
- National Insurance Number (NINO) – where possible (new requirement)
- Immigration status – if non-British or non-EU Commonwealth citizen (new requirement)
- Declaration as to whether they are/have been registered elsewhere in the last 12 months (new requirement)
- Previous address where registered in the last 12 months (new requirement – currently requested but not mandatory)

Information of a sensitive nature will be collected on individual forms – this includes date of birth, NINO, and immigration status. Nationality information will also be collected (whilst this is not considered sensitive information, it can provide an indicator of ethnic origin and so will be treated with the same care).

Whilst much of the above information could be considered personal data it is important to distinguish between franchise and eligibility, and verification. Information such as nationality and immigration status are required to determine a person's franchise and eligibility whereas other information such as date of birth and national insurance number will be used specifically for verification purposes.

It is important to note that although additional information will be collected this will not form part of the electoral register. The information currently captured on the electoral register will remain the same.

Why is it being collected?

The system for registering to vote in Britain has remained similar since the early twentieth century. Electors register to vote through the annual canvass of households conducted by the ERO in the autumn of each year, although since 2001 electors have also been able to register through 'rolling registration' at any time throughout the year.

Aside from the other drivers for the move to IER, it is desirable as a matter of principle that a person's ability to vote is not dependent on whether another person has placed their name

almost unique in continuing this system. Whilst individuals can register in year using the rolling registration system, a small proportion of people do so (approximately 2% per annum), and households are required by law to respond to the annual household canvass.

IER will improve a person's ability to keep their personal information private, as one person in the household will no longer require the information from other occupants in order to complete an electoral registration form. This is particularly the case in houses of multiple occupation, where occupants are less likely to be family members and potentially less comfortable with sharing information within the household.

Reducing Fraud

While electoral fraud is rare, any fraud undermines public confidence. The current system of electoral registration is unacceptably exposed to the risk of fraud and this is why the Coalition Government agreed to speed up the introduction of individual registration to improve security. From 2014 any person wishing to apply to be included in an electoral register will be required to provide additional information to the electoral registration officer so that this can be cross checked and the application verified.

There remain a significant number of people who perceive fraud to be a problem (40% of people surveyed for the Electoral Commission's Winter Research 2010) and this can have a corrosive effect on trust in our political system.

A key vulnerability in the system is the fact that currently both the canvass and the rolling registration processes are trust based with no proof of eligibility required. Although an ERO may refuse to register a person if it does not appear that the applicant is eligible. This has led to accusations that large numbers of alleged fraudulent rolling registration forms are being submitted close to the poll and in a number of cases the Police have successfully prosecuted people for doing so.

IER will tackle these sources of fraud by introducing a requirement for people to register individually and provide personal information, which is then used to verify the entitlement of the person making the application to be registered. Only those persons who pass the verification checks will be added to the register.

Who will it impact?

The information will be collected from every person who makes an application to register to vote in Great Britain. It should be noted that whilst it will be compulsory to provide information to verify an application in order to register, it will not be compulsory to register to vote. Each eligible person will make their own decision about whether they wish to register to vote.

Data Management

A data management policy has been developed which sets out the arrangements for the management of electoral registration data by Electoral Registration Officers (EROs – for England and Wales) and Assessors (for Scotland) upon implementation of IER from 1 July 2014. The policy applies to the information which includes NINOs, signatures and dates of birth that will be collected as part of the registration process in order to verify electors. There will also be cases where some electors do not have a NINO and will need to provide other evidence to verify their application.

The policy will continue to be developed over time and sets out the approach for the secure capture and storage of personal information and the rules for the retention, disposal, access, supply, use and reuse, validation, and refresh of this information. Any technical solution put in place will comply with this policy and current data protection legislation and policy.

This policy will continue to be tested through ongoing consultation with various key stakeholders including the Information Commissioners Office, Electoral Commission, Association for Electoral Administrators, Society of Local Authority Chief Executives, Electoral Registration Officers and organisations concerned about privacy. Consultations have also taken place with the Metropolitan Police, Association of Chief Police Officers and the Serious Organised Crime Agency. As such, the policy is expected to develop throughout the lifetime of the project. Relevant Government departments are and will continue to be involved in the development of this policy to ensure the security of information.

Retention and Disclosure

Electoral Registration Officers will be required to securely destroy records of NINOs once they have been used for verification.

There will be strict rules around the disclosure of the information and it is proposed that regulations will provide that the following will be an offence:

- Disclosure of the information provided by an applicant in their electoral registration application, or the information provided by any entity in the entitlement verification process to any person not involved in the registration or verification process.

The additional information collected as part of the electoral registration application will not appear on the electoral register. The details currently captured in the electoral register will remain the same.

Verification of Data

EROs will be required to verify the entitlement of an applicant within a standard framework – that is to say within the framework of a policy, that may be expressed in legislation, setting out the assurance that must be achieved and the evidence required to achieve it.

The objective of this verification is for EROs to assure themselves that an applicant for electoral registration is a real person, with a real address and a real association between the two. It is proposed that this will be determined by the use of connecting addresses with the Local Land and Property Gazetteer (current practice which determines whether an address is real and correct), and the individual responding to a write-out. Where an individual makes an unsolicited application a follow-up mailing can be issued to them containing a Unique Identification Number to confirm an association with an address.

An appropriate balance must be struck between security and accessibility. The test for inclusion on the register must not be so high that electors are dissuaded from registering but must be high enough to sufficiently harden the electoral register as a target for fraud.

It must appear to the ERO that the applicant is a genuine person with a genuine association with a genuine address. Legislation will allow guidance to be given as to the standards that must be met for an ERO to be satisfied that this is the case.

It is proposed that authentication is achieved from a cumulative process derived from two or more pieces of evidence from trusted sources.

Verification will therefore be derived from a mixture of direct evidence of the applicant being resident together with validating a standard set of biographical data supplied by the applicant (at the outset, in most cases this will consist of name, address, date of birth and NINO) which is mapped against one or more trusted data sources.

Alternatives for Verification Process

Whilst the above describes how the verification of applications is likely to operate for the majority of electors at the outset of IER, Electoral Registration Officers will have the power to require further or different information and accept assurances from trusted sources in an effort to avoid duplication and requiring excessive amounts of personal data to be supplied by individuals.

Impact on Individuals

Notice will be given to all individuals of the need to provide additional information when registering to vote through a public information campaign at the time of implementation. From 1 July 2014, the application form for electoral registration will require additional information in order to verify applications. As part of an electoral registration application individuals will be provided with a fair processing notice which will set out how their data will be used. Individuals will have access to their own data through the standard procedures under the Data Protection Act. Those individuals who do not wish to or cannot provide this information through one of the main channels will be offered alternatives such as attending in person and providing alternative documentation.

System users

The users of this system are set out in Section 4 – Data Flow Analysis. These users will have access to the information for the purposes of verification and electoral administration only (for example to determine duplicate entries in the register). Users will be security cleared to appropriate levels and systems will provide access only to those users who have such clearances and will also contain audit trails of access.

It must be stressed that additional personal data collected as part of the electoral registration application under IER will not form part of the electoral register. The current information that forms part of the electoral register will remain the same under IER.

A system solution to manage this information is being developed. The development process will ensure that security is a critical component and Privacy Impact Assessments and mitigation will be an ongoing process.

Organisational relationships

The additional personal data will be shared with organisations external to the Electoral Registration Officer for the purpose of verification and ensuring the accuracy of the register only. The additional information will not be re-used for any purpose other than maintaining accurate registers. Electoral Registration Officers and external organisations (as applicable) will store this information securely whilst in use and will dispose of the data securely after a defined period, in compliance with the Data Protection Act and other legislation. External organisations include the Department for Work and Pensions and other areas of the local authority.

The data that will be shared for the purposes of verification is:

- Name

- Date of birth
- Address
- Nationality
- NINO

Date of birth, nationality and NINO data will not be shared with any external organisations other than for the purposes of verification and ensuring the accuracy of the register (although it should be noted that name and address appear on the electoral register and therefore are shared with other external organisations under current legislation).

Further consultation and policy development will determine the specific retention periods and rules for disposal of information for both Electoral Registration Officers and external organisations. It is the intention to dispose of any information as soon as possible once it is no longer required for processing.

The electoral register is currently shared with other organisations under legislation and this is not anticipated to change under IER. The additional personal data provided will not form part of the electoral register.

Technology employed

A solution for the storage and transmission of personal information collected from electoral registration applications has not yet been determined. A project team is in place to determine user and security requirements, user access to the system and information, auditing procedures and safeguards, and user training. The Privacy Impact Assessment for this solution will be developed and assessed as the project progresses.

The Government takes the handling of personal data and the prevention of identity fraud very seriously and as such, any solution will ensure the secure storage and transmission of personal data, in accordance with standard legislation and policy requirements.

Users of the system will be local authority employees who will be trained in the appropriate use of the system and security of personal data.

Legislation and policies

IER policy does not create any adverse affects under the following legislation:

- Privacy and Electronic Communications Regulations 2003.
- Human Rights Act 1998
- Regulation of Investigatory Powers Act (RIPA) 2000

Solution adopted

A solution for the storage and transmission of personal information collected from electoral registration applications has not yet been determined but will be in place for implementation from 1 July 2014.

Data protection/risk reducing designs

As a solution is being developed, it is not possible to document the specific data protection or risk reducing design. The necessary design features to secure personal data will be a requirement of any solution implemented for this purpose.

Data flow analysis

Business data flow description

Personal data will flow between three defined groups of organisations under IER. These are:

- Individual electors;
- Electoral Registration Officers; and
- Data holders.

Data flow table

This table lists the data flow and organisations involved in transmitting and receiving data.

Organisation	Data Flow
Elector	<p>Transmits</p> <ul style="list-style-type: none">- Provides information for individual electoral registration application (see section 3 for further detail) to Electoral Registration Officer. Provided by mail, or potentially alternative channels such as telephone, online or face to face.
Electoral Registration Officer	<p>Receives</p> <ul style="list-style-type: none">- Information from individual electors on individual registration application (from 2014 onwards), received by mail, or potentially online, telephone or face to face. ERO determines external data match requirement.- Household enquiry information on occupants of households (from 2015 onwards). Received by mail, potentially online or telephone.- Match reports from DWP/HMRC on NINO checks, received via secure network.- Data from data holder, received via secure network.- Match report from data holder, received via secure network. <p>Transmits</p> <ul style="list-style-type: none">- Request to DWP/HMRC to check National Insurance

	<p>Number, sent via secure network.</p> <ul style="list-style-type: none"> - Request to data holder to match data, sent via secure network.
Data Holder	<p>Receives</p> <ul style="list-style-type: none"> - Request from ERO to match data, received via secure network. <p>Transmits</p> <ul style="list-style-type: none"> - Data to ERO, sent via secure network. - Runs match and sends match report to ERO, sent via secure network.

Note:

A solution for the storage and transmission of personal information collected from electoral registration applications has not yet been determined but will be in place for implementation from 1 July 2014, therefore specific methods of transmission cannot be detailed at this time.

Data protection analysis and risk management plan

Stakeholders/participants

The following organisations and key stakeholders have been involved in the assessment of data protection risks for this policy:

- Information Commissioner's Office
- Metropolitan Police
- Association of Chief Police Officers
- Serious Organised Crime Agency
- HM Revenue and Customs
- Department for Work and Pensions
- Electoral Commission
- Association of Electoral Administrators
- Society of Local Authority Chief Executives
- Electoral Registration Officers

Analysis process

This process has involved both formal and informal engagements to determine the risks to personal data and controls and mitigation strategies to manage these risks.

Technology

A solution for the storage and transmission of personal information collected from electoral registration applications has not yet been determined but will be in place for implementation from 1 July 2014. The necessary design features to secure personal data will be a requirement of any solution implemented for this purpose.

Verification

The policy proposes the provision of National Insurance numbers by individuals to assist in the verification of applications, as well as a new process to register to vote. The identity of 'at risk' electors who may suffer physical harm if they are found e.g. anonymous electors will be protected at all times.

A significant amount of work has been conducted with various stakeholders on the security risk to personal information and appropriate mitigation strategies which have and will continue to be incorporated into policy and business processes.

Multiple Organisations

The policy requires data sharing between multiple organisations for the purposes of verification of entitlement and electoral administration only. The breakdown of information

silos in this instance will be tightly controlled, within the law, and aim to reduce fraud and for fraud detection. The personal data will be shared only for data matching purposes to determine if an elector has provided genuine information on their application and for ensuring the accuracy of the register.

Data and Data Handling

The policy involves the handling of personal data in a new way. Currently both the canvass and the rolling registration processes are trust based with no proof of eligibility required, although an ERO may refuse to register a person if it does not appear that the applicant is eligible.

This policy will require individuals applying to register to vote to provide additional information which will be used to verify their application before they are added to the electoral register. With approximately 46 million people currently on the electoral registers in Great Britain this policy affects a large proportion of the population.

The Information Commissioners Office has advised that nationality could be considered sensitive information as it provides an indicator of ethnic origin. While the other data collected is not considered sensitive, it does provide key information which could be used for identity and other fraud and so must be protected in the same way.

The verification process will involve data matching of personal data, possibly from multiple sources. Additional personal data will only be shared for the purposes of verification and electoral administration and not for commercial purposes such as consumer marketing.

The overarching data protection principles will not be changed by this policy. Data collection policies and practices; quality assurance processes and standards; security and access arrangements; and data retention arrangements will be made clear and extensive and will meet current legislation and policy requirements.

Exemptions and Exceptions

The policy **does not** propose:

- Data processing that is exempt from legislative data protection measures, subject to the paragraph below;
- Disclosure of personal data to third parties who are not subject to comparable data protection regulation;
- New or changed data handling that is exempt from data protection measures.

The only exemptions and exceptions that will be lawful are those that are permitted under current legislation, for example disclosure of information for the purposes of law enforcement. There is no intention to add to the current list of exemptions. Statutory bars that prevent information being disclosed entirely may be disapplied so as to ensure that the policy is not prevented from being carried out.

Risk management

The Government takes the handling of personal data and prevention of identity fraud very seriously. The changes that are being proposed to electoral registration are intended to prevent fraud and maintain the integrity of the electoral system. Below is an overview of the data protection and data sharing risks and the controls and mitigation strategies which are or will be put in place:

Risk Description	Controls/Mitigation
Data security breach – data mishandled by registration officer or other authorised users.	<p>Data management policy in place and monitored.</p> <p>Engagement with IT suppliers to ensure systems appropriate to protect data.</p> <p>Continued engagement with key stakeholders to ensure security of personal data is built into policy and processes.</p>
Data is used for unauthorised purposes or shared inappropriately.	<p>Data management policy in place and monitored. Will conform to data protection principle of data being processed for specific and lawful purposes.</p> <p>Engagement with IT suppliers to ensure systems appropriate to protect data.</p> <p>Continued engagement with key stakeholders to ensure security of personal data is built into policy and processes.</p>
Data is accessed by unauthorised persons.	<p>Data management policy in place and monitored.</p> <p>Engagement with IT suppliers to ensure systems appropriate to protect data.</p> <p>Continued engagement with key stakeholders to ensure security of personal data is built into policy and processes.</p>
Inappropriate retention of the data.	Data management policy will clearly set out retention and disposal schedules and will conform to data protection principle of not keeping data for longer than is necessary.

It must be noted that due to the nature of the personal data being collected, there are specific risks around the data being used for identity and other fraud. Significant work has already been conducted with key stakeholders on assessing and mitigating these risks and will continue throughout the development of policy and processes.

Communication/publication strategy

Communications

The PIA will be published alongside the draft legislation and will be disclosed in full.

Publication strategy

The draft legislation, White Paper and impact assessments will be open for comment until October 2011.

Analysis of material received during this consultation period will be conducted and incorporated into the development of the PIA. It is intended that this Privacy Impact Assessment will be a living document and develop over the life of the project.

Approval of report

Approval of: Individual Electoral Registration – Privacy Impact Assessment

A handwritten signature in black ink that reads "Mark Harper". The signature is written in a cursive style with a horizontal line at the end.

Minister Mark Harper MP, Minister for Political and Constitutional Reform

Date of approval 29/06/2011



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