



Ministry of Housing,
Communities &
Local Government

Electoral Integrity Programme: European Union Voting and Candidacy Rights (EUVCR) Evaluation



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July 2026

Foreword

This report presents findings for the research and analysis conducted to evaluate the implementation and impact of the European Union Voting and Candidacy Rights Policy (EUVCR). This evaluation was conducted by the Ministry of Housing, Communities and Local Government's Elections Research and Analysis team.

The EUVCR policy was part of the Electoral Integrity Programme, which was introduced by the previous UK Government through the Elections Act 2022. Other measures included in the Electoral Integrity Programme have previously [been evaluated by IFF Research](#).

I would like to thank colleagues in the Elections Research and Analysis team for their work conducting this research. I would also like to extend thanks to colleagues in the Elections Directorate and researchers in the Electoral Commission for supporting this evaluation.

Finally, I would like to thank electoral services teams in local authorities and the Electoral Office for Northern Ireland for taking part in this research, without which the evaluation could not have been completed.

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1. Executive Summary

1.1 Policy background

The previous Government pursued a policy of changing the voting and candidacy rights of European Union (EU) citizens following the withdrawal of the United Kingdom (UK) from the EU. These changes were applied to local elections in England and Northern Ireland, elections to the Northern Ireland Assembly, and Police and Crime Commissioner (PCC) elections in England and Wales. UK Parliamentary elections were not affected as EU citizens have never been able to vote in those elections. Scottish Parliamentary elections, Senedd elections and local elections in Scotland and Wales were not affected as responsibility for those elections is devolved.

Previously, all EU citizens who were otherwise eligible (i.e. who also satisfied age and residence criteria) could participate in these elections. The changes introduced by the previous Government ensured that EU citizens who have been continuously resident in the UK since 31 December 2020 (the end of the EU Exit implementation period) would maintain existing voting rights. Individuals who had not been continuously a resident in the UK since that date may only be able to participate in the elections if they are citizens of countries where the UK holds a bilateral voting rights treaty. These countries are Denmark, Luxembourg, Poland, Portugal and Spain. It should also be noted that citizens of Ireland, Malta and Cyprus were not affected by these changes. Irish citizens have voting rights in UK elections separately to their status as EU citizens, and Maltese and Cypriot citizens have voting rights in the UK on the basis of Malta and Cyprus' membership of the Commonwealth.

In order to implement these changes, it was necessary to conduct a process of Eligibility Confirmation and Review of those EU citizens who were already on the electoral register, to ensure they were still eligible to be registered to vote under the new rules for EU citizens.

The regulations came into effect on 7th May 2024, with Electoral Registration Officers required to complete the Eligibility Confirmation and Review by the 31st January 2025.

1.2 Evaluation approach

This evaluation was conducted by the Ministry of Housing, Communities and Local Government (MHCLG). A theory-based approach to conduct a process and impact evaluation of the European Union Voting and Candidacy Rights (EUVCR) policy was chosen. A Theory of Change was created to express how the policy would lead to change, and what the potential impacts may be in the short-, medium- and long-term.

Following this, three contribution claims were developed, which reflect the objectives of the policy and the long-term changes it aims to achieve. These claims were then

assessed against the available evidence relating to the policy. This evidence included a survey conducted with Electoral Registration Officers in England and Wales plus the Electoral Office for Northern Ireland, monitoring data from MHCLG digital election services and data collected by the Electoral Commission on the eligibility confirmation and review process.

This approach mirrors that used in the year 1 and year 2 Electoral Integrity Programme evaluation reports conducted by IFF research.

1.3 Overall findings

Table 1.1 below summarises the outcomes and conclusions of the three contribution claims. It should be noted that claims 2 and 3 were rated as partially met due to a lack of evidence in key areas rather than due to any evidence suggesting the claims have not been met.

Table 1.1: Summary of claim outcomes

Claim Title	Claim Outcome	Claim Conclusion
Claim 1: Local authority staff in electoral service teams, Electoral Registration Officers and the Electoral Office for Northern Ireland meet the requirements of law.	Claim met	There is sufficient evidence to indicate that local authorities, Electoral Registration Officers and the Electoral Office for Northern Ireland met their requirements in line with the law.
Claim 2: Eligible EU citizens are able to register for, vote in, and stand as candidates in local and PCC elections and are not deterred from doing so.	Claim Partially Met	There is strong evidence that eligible EU electors remain able to register to vote. However, there is inconclusive or no evidence around whether they are able to vote or stand in elections and are not deterred from doing so.
Claim 3: The franchise reflects the UK's new relationship with the EU.	Claim Partially Met	There is evidence that the franchise has been reviewed in line with the objectives of the policy and that ineligible EU electors are deterred from attempting to register to vote. However, there is no evidence on whether ineligible EU electors are deterred from voting or standing in elections.

The main findings of the evaluation are that the policy was delivered by Local Authorities effectively and they met the requirements of the law relating to the policy. However, implementation of the policy was hampered in some cases by issues

experienced in the electoral management software systems and the underlying data that supported the processing and reporting.

The evidence suggests that eligible EU electors remain able to register to vote, while ineligible EU citizens are deterred from attempting to register to vote. While the evidence on eligible electors remaining able to vote is inconclusive (due to a small sample size), there is currently no evidence to assess whether eligible electors are deterred from standing as candidates.

There is also evidence that EU citizens in Wales who, due to these changes, are now ineligible to vote in PCC elections, nonetheless remain able to register to vote for devolved elections, which they remain eligible to vote in.

Electoral Commission data suggests that the number of registered EU electors fell by 200,000 following the eligibility confirmation and review, adjusting the franchise in line with the objectives of the policy.

However, concerns were raised by some Electoral Registration Officers that there was no way to verify the information provided by electors during the review.

2. Introduction

2.1 Policy background

As part of the Elections Act 2022 and following the withdrawal of the UK from the EU, the previous government legislated to change the voting and candidacy rights of EU citizens. Prior to Elections Act 2022, EU citizens who were otherwise eligible (i.e. who also satisfied age and residence criteria) could vote and stand as candidates in all polls except UK parliamentary general elections and national referendums. The EUVCR policy changes the EU citizens voting and candidacy rights for local elections in England and Northern Ireland, elections to the Northern Ireland Assembly, and PCC elections in England and Wales.

The franchise in local government and devolved administration (Senedd and Scottish Parliament) elections in Wales and Scotland are the responsibility of the respective devolved administrations. Voting and candidacy rights of EU electors in these elections are not affected by this policy.

The changes introduced by the previous government ensured that otherwise eligible EU citizens who have been continuously resident in the UK since the Implementation Period Completion Date (31st December 2020) maintain existing voting and candidacy rights. This is referred to as 'retained rights'. Otherwise eligible EU citizens who have been continuously resident in the UK may only be able to participate in the elections if they are citizens of countries where the UK holds a bilateral voting rights treaty. This is referred to as 'qualifying rights'.

The five countries with which the UK holds a bilateral voting rights treaty are referred to throughout the evaluation as EU5 nations. While other EU member states are referred to as EU19 nations, the countries in this group are listed in the glossary in the annex. It should also be noted that citizens of Ireland, Malta and Cyprus were not affected by these changes. Irish citizens have voting rights in UK elections separately to their status as EU citizens, and Maltese and Cypriot citizens have voting rights in the UK on the basis of Malta and Cyprus' membership of the Commonwealth.

To allow EU electors to register to vote under the new requirements, additional questions were added specifically for EU electors to the Register to Vote application, both to the paper forms and online journey, to assess their eligibility.

To ensure that all registered electors were eligible under the new regulations, it was necessary to conduct a process of Eligibility Confirmation and Review of those EU citizens who were already on the electoral register, to ensure they were still eligible to be registered to vote under the new rules for EU citizens.

There were two sections to the Eligibility Confirmation and Review, firstly a data-based review, where the eligibility of the elector was assessed based on data already held by the electoral registration officer. In cases where the elector's eligibility could not be confirmed, they are then subject to a correspondence-based

review, where the Electoral Registration Officer would contact the elector, to require them to provide the information necessary to assess their eligibility. To support this, the Ministry of Housing, Communities and Local Government (MHCLG) developed a digital service to allow Electoral Registration Officers and electors to communicate online. Suppliers of electoral management software also developed additional functionality in their products to support the Eligibility Confirmation and Review, and processing of new applications from EU electors.

The regulations came into effect on 7th May 2024, with Electoral Registration Officers required to complete the Eligibility Confirmation and Review by the 31st January 2025.

2.2 Evaluation objectives

The objective of this evaluation is to evaluate the process of the implementation of the policy and its subsequent impact.

The process evaluation is based on evidence collected from Electoral Registration Officers on their experience of delivering the policy. This is used to assess if the policy was successfully implemented and identify any lessons learned for future policies.

The impact evaluation uses the Electoral Registration Officer feedback and monitoring data collected by MHCLG and the Electoral Commission to assess if the policy has achieved its stated objectives and its impact on electors and candidates.

2.3 Methods

This evaluation was conducted internally by MCHLG's Elections Research and Analysis team and applies a theory-based approach. This mirrors the methodology used in the [year one](#) and [year two](#) Electoral Integrity Programme evaluation reports conducted by IFF research.

A Theory of Change model was developed for the EUVCR policy. This sets out what inputs and activities are required to deliver the policy and what the expected impacts and outcomes are in the short-, medium- and long-term. The Theory of Change is shown in the annex in section 8.3.

Contribution analysis was then used to assess if the available evidence suggests that the intended outcomes of the policy outlined in the Theory of Change have been achieved. Three contribution claims were developed based on the Theory of Change; these aim to describe the objectives of the policy and the long-term changes it aims to achieve. These claims are also subsections of the Theory of Change.

The evidence described in Section 2.4 is assessed against the three claims and a judgement is made as to whether the claim has been met or not. There are four possible outcomes for a claim.

1. *Claim met*: There is strong evidence to suggest that the claim has been met.
2. *Claim partially met*: There is strong evidence that parts of the claim have been met, but also evidence that some areas have not been met. Or there is evidence that the claim has been met, but the evidence is not strong enough to be certain in that conclusion.
3. *Claim not met*: There is strong evidence to suggest that the claim has not been met.
4. *Inconclusive*: There is not enough evidence for a judgement to be made as to whether the claim has been met.

2.4 Data sources

The evaluation used several data sources collected both by MHCLG and the Electoral Commission. The data sources used are listed below:

1. *Survey of Electoral Registration Officers in England and Wales*: Following completion of the Eligibility Confirmation and Review and implementation of changes to EU citizens' candidacy and voting rights, Electoral Registration Officers in English and Welsh local authorities were surveyed on the delivery and operation of the policy. A total of 160 of the 318 Local Authorities responded to this survey (50.3% completion rate). The survey took place in March 2025.
2. *Survey of the Electoral Office for Northern Ireland*: The same survey that was sent to Electoral Registration Officers in England and Wales was sent to Electoral Office for Northern Ireland, with some adjustments to reflect differences in the policy in Northern Ireland. This survey had a single response (100% completion rate). The survey was completed in June 2025.
3. [Electoral Commission Eligibility Confirmation and Review Monitoring Data](#): As set out in legislation, Electoral Registration Officers were required to provide data on the operation of the Eligibility Confirmation and Review to the Electoral Commission who subsequently published a report summarising the data.
4. *MHCLG Register to Vote Monitoring Data*: Data from the online register to vote service on the number of applications, franchise of applicants and responses to citizenship and residency questions.
5. *MHCLG Eligibility Confirmation and Review Digital Service Monitoring Data*: As part of the Eligibility Confirmation and Review, MHCLG developed a digital service to allow Electoral Registration Officers to contact electors and allow

them to respond to the Eligibility Confirmation and Review. Monitoring data from this service on electors contacted and response received was used.

6. [British Election Study Internet Panel](#): The British Election Study Internet Panel is an academic survey of political attitudes and behaviours in Great Britain which surveys a large sample (approximately 30,000 people per wave) following major elections. This data is used to estimate turnout from EU electors in the 2023, 2024 and 2025 local elections in England.
7. *Electoral Integrity Programme New Burdens Funding Data*: Data on funding provided to local authorities by MHCLG to cover the costs of delivering the EUVCR policy, from 2022/23 to 2024/25.
8. [Office for National Statistics Electorate Statistics](#): Statistics on the number of registered electors in Great Britain, as of 1st December 2023.

2.5 Key methodological considerations and limitations

The measures in the policy apply differently across the UK. In England changes to the franchise apply to local elections and Police and Crime Commissioner elections. In Wales they apply only to Police and Crime Commissioner elections. It should be noted that anyone living in Wales made ineligible under this policy remains able to vote in local elections and Senedd elections (and can remain on the electoral register). In Northern Ireland it applies to local elections and Assembly elections. In Scotland it does not apply at all.

Survey of Electoral Registration Officers in England and Wales & Survey of the Electoral Office for Northern Ireland

With the research carried out with Electoral Registration Officers, there is the possibility of selection bias to be considered, as those who completed the survey may have differing views from those who did not.

MHCLG Register to Vote Monitoring Data

With the Register to Vote Monitoring Data, some of the fields used in the evaluation are only available for applications submitted through the online service, meaning applications submitted by paper are excluded from the analysis. It is possible that those who submitted applications by paper may have different characteristics to those who used the online service.

Electoral Commission Eligibility Confirmation and Review Monitoring Data

Several data quality issues were found with the Electoral Commission Eligibility Confirmation and Review Monitoring Data. These included errors in the data collection software created by the electoral management software suppliers and

instances of user error with maintaining the data inside the electoral management software.

Both of these issues led to undercounting of certain data points. This has been partially mitigated by the Electoral Commission's cleaning of the data.

British Election Study Internet Panel

As a long-term panel, the British Election Study Internet Panel may include participants who are more politically engaged than the wider public, potentially leading to an overestimate of turnout levels at elections.

3. Claim 1: Local authority staff in electoral service teams, Electoral Registration Officers and the Electoral Office for Northern Ireland meet the requirements of law.

Shown below in table 3.1 below is a summary of the outcome for claim 1.

Table 3.1: Outcome summary for claim 1.

Claim Outcome	Claim Conclusion
Claim met	There is sufficient evidence that local authority staff and the Electoral Office for Northern Ireland met the requirements of the law. Evidence shows that changes to voter registration processes for EU citizens and the Eligibility Confirmation and Review have been delivered. However, few local authorities have experienced EU citizens standing as candidates. Local Authorities reported that electoral management software functionality was occasionally a challenge when conducting the Eligibility Confirmation and Review and processing applications and reporting, however these did not impact the delivery of policy.

The evaluation evidence is sufficiently strong to indicate that changes to voter registration processes for EU citizens have been implemented and that the Eligibility Confirmation and Review has been delivered. Electoral staff in England, Wales and Northern Ireland have had limited experience (or no experience) of delivering changes to candidacy rights. This is because there has only been one small set of elections in England since the policy came into force (the May 2025 local elections). However, there is no evidence to indicate respondents were concerned about implementing changes to candidacy rights.

There is sufficient evidence to conclude that local authority staff in England and Wales were prepared to deliver all three measures. The majority of respondents felt that training and guidance on processing new register to vote applications, delivering changes to candidacy rights and delivery of the Eligibility Confirmation and Review was effective, and felt confident delivering all three elements of EUVCR.

There is evidence that the Electoral Office for Northern Ireland felt prepared to deliver most aspects of the EUVCR changes, but reported feeling 'Not very confident' in relation to changes to the register to vote process. This could have contributed to finding the measures 'fairly challenging' to deliver EUVCR overall. However, the Electoral Office for Northern Ireland delivered the changes despite this.

How some of the functional and reporting requirements specified by MHCLG were implemented by some of the electoral management software vendors presented some

challenges for some Local Authorities when implementing EUVCR, but despite this, local authorities met the requirements of law.

In total, 24% of survey respondents said that 'electoral management software integration' was an important challenge in delivering the changes to registering EU citizens, and 29% said 'electoral management software functionality' was an important challenge to delivering the Eligibility Confirmation and Review. Related to this, the Electoral Commission said there were quality issues with the Eligibility Confirmation and Review reports produced by local authorities' electoral management software systems. These electoral management software challenges, while burdensome for some Electoral Registration Officers, did not prevent Electoral Registration Officers from meeting the requirements of the law.

Since the policy has been implemented, the UK has not signed any further bilateral voting and candidacy rights agreements with EU nations. This means that the processes relating to implementing a new voting and candidacy rights agreements have not been tested in this evaluation.

3.1 Claim summary

This claim examines the extent to which local authority staff fulfilled their roles in implementing changes to EU citizens' voter registration processes; changes to EU citizens' candidacy rights; and delivery of the Eligibility Confirmation and Review.

For this claim to be met, Electoral Registration Officers in England and Wales and the Electoral Office for Northern Ireland must have been prepared to deliver, and then successfully delivered the three changes in accordance with the legislation.

To do this, training and guidance on the voter registration, candidacy rights and the Eligibility Confirmation and Review should be available for local authority and Electoral Office for Northern Ireland staff.

In cases where the preparedness of local authorities seems less (for example if they have not received training), it is to be expected that the measures may have been more difficult to implement. If, despite lack of preparedness, the measures are still delivered, then the legal requirement has been upheld, and therefore the claim has been broadly met.

3.2 Preparedness to deliver the requirements

The majority of respondents to the survey of Electoral Registration Officers (61%) felt it was easy to implement the EUVCR policy overall, they felt confident in delivering changes, and they felt that the training and guidance provided was effective.

When asked specifically about voter registration, the majority of respondents in England and Wales reported that training (78%) and guidance (81%) to support processing new register to vote applications from EU citizens was effective. The vast majority (98%) also felt confident processing new register to vote applications from EU citizens, and 76% felt it was easy to implement the measure.

When asked about changes to candidacy rights, over half of respondents (64%) in England and Wales reported that the training was effective. A slightly higher percentage said the guidance was effective (74%). The majority of respondents (82%) said that they were confident delivering the changes to the candidacy requirements and that implementing the changes to candidacy rights was easy (59%). The 5% of respondents who felt ‘not at all confident’ delivering the changes, were asked to explain why. The following themes were raised across two responses: the complexity of the measure; the lack of capacity to adapt to the measure; and the short timescale for implementation.

“It is difficult to understand ... [I’m] not sure the team would feel confident”

When asked about the Eligibility Confirmation and Review, the majority of respondents in England and Wales said training and guidance was effective (86%), and most (94%) felt confident delivering the review. Over half reported that it was easy to implement the Eligibility Confirmation and Review (59%). The 1% of respondents who said they were ‘not at all confident’ delivering the Eligibility Confirmation and Review were asked to explain why. The two responses covered the following themes: resource issues; finding it a difficult area to engage with electors on; technical issues completing the review; and time delays/ a lack of communication on sending the Eligibility Confirmation and Review final letter (the respondent may be referring to not having received the confirmation from Royal Mail that letters had been sent in a timely manner).

The Electoral Office for Northern Ireland felt prepared to deliver most aspects of the requirements, but reported feeling ‘Not very confident’ in processing register to vote applications from EU electors. The Electoral Office for Northern Ireland reported that it was ‘fairly challenging’ to process new register to vote applications, implement the Eligibility Confirmation and Review, and implement EUVCR overall. They reported it was ‘neither easy nor challenging’ to make changes to candidacy requirements (it should be noted that no elections have taken place in Northern Ireland since the policy came into effect). The Electoral Office for Northern Ireland reported that training and guidance on the Eligibility Confirmation and Review was ‘neither effective nor ineffective’, but that they felt ‘fairly confident’ delivering changes to candidacy rights and the Eligibility Confirmation and Review. They also felt that guidance on candidacy rights was ‘neither effective or ineffective’ and did not attend training on candidacy rights. The training and guidance on voter registration processes was better received and reported to be ‘fairly effective’, however the Electoral Office for Northern Ireland reported feeling ‘not very confident’ when processing register to vote applications.

3.3 Delivery of changes to the voter registration process

Historical Residency and Citizenship questions

To enable eligible EU19 EU citizens to apply to register under the new criteria, additional nationality questions were added to the online and paper registration forms, one of which is the Historical Residency Question. The Historical Residency Question is phrased as such:

“Since 31 December 2020 have you continuously had permission to enter or stay in the UK, Channel Islands or Isle of Man — or not needed it?”

Responses to this question determine whether the applicant is an 'EU citizen with retained rights' and therefore eligible to vote under the new criteria. To meet this status an applicant needs to have legally been a resident since before the UK left the EU on 31/12/2020.

If an EU19 citizen also has citizenship of another country that does not grant them voting and candidacy rights (all except UK (including overseas territories), Republic of Ireland, Commonwealth or EU5 nations), they must have had EU19 nationality prior to 31/12/2020. These citizens were also asked the Historical Citizenship Question to determine their eligibility:

"Were you a citizen of [relevant EU country] on 31 December 2020?"

Due to a legislative error (in relation to an inaccurate definition of 'relevant EU applicants'), there was a period of 2 weeks when citizens of an EU19 country who were also citizens of the UK (including overseas territories), Republic of Ireland, Commonwealth or EU5 nations were asked the Historical Residency Question in their application to register to vote. This occurred even though the answer was highly likely to be immaterial to that person's eligibility to register to vote, as their eligibility would rest on the other nationality they held.

In order to rectify this oversight, [a piece of secondary legislation](#) was brought into effect on 24th May 2024. This amended existing secondary legislation to refine definition of 'relevant EU applicants' to match the intention of the policy.

Over half of respondents (58%) to the survey of Electoral Registration Officers reported that they had rarely had to deal with queries related to the impact of EUVCR and the Historical Residency Question on people with dual nationalities.

Of the remaining respondents, 21% said they dealt with these queries 'sometimes', 16% said they had 'never' dealt with these queries, and 5% said they dealt with these 'quite often'. The Electoral Office for Northern Ireland reported that they 'sometimes' had to deal with queries.

When asked to describe the queries and challenges about the Historical Residency Question (and EUVCR generally), multiple respondents said there was confusion around electors' eligibility. For the Electoral Office for Northern Ireland, this included confusion around the eligibility of those who have Irish and British citizenship, and those with an additional third citizenship. For Electoral Registration Officers in England and Wales there was confusion around: those with EU and Commonwealth dual citizenship (for example, a citizen may register with their ineligible EU citizenship, when they would have been eligible due to their Commonwealth citizenship); those who were previously ineligible under EUVCR but have recently gained British citizenship; whether citizens settled/ pre-settled status entitles them/ their spouse to register. Queries mentioned once by Electoral Registration Officers in England and Wales are listed in the bullets below:

- Queries from electors who registered with one of their dual nationalities then requested to update their nationality after receiving the review letter;
- Queries on whether indefinite leave to remain qualifies electors to register;

- Queries around the eligibility of people with EU and Commonwealth citizenship who have EU visas granted after the Implementation Period Completion Date;
- Queries around whether electors with periods of non-residency are eligible to register;
- Queries from electors with eligibility under more than one criterion.

Nearly half (48%) of respondents also selected 'lack of public understanding/ voter confusion regarding the new eligibility criteria' as one of the most important challenges of processing new register to vote applications.

"During the General Election a case came up where one sibling registered as South African, the other registered as Portuguese, which caused frustration to the sibling who could not vote in the General [Election] when the other could"

Challenges and queries related to systemic elements of the Historical Residency Question (and EUVCR) were mentioned infrequently but included: the design of the Invitation to Register form and Historical Residency Question (in terms of issues with clarity and the Invitation to Register form being multi-page); electoral management software issues; and non-response from letters. It is important to note that the 'phrasing of the Historical Residency Question' was selected as one of the most important challenges to processing register to vote applications by the Electoral Office for Northern Ireland and 31% of Electoral Registration Officer respondents.

Another challenge mentioned infrequently (roughly 5% of respondents to the survey) was that electoral officials are unable to verify elector responses to the Historical Residency Question which may lead to ineligible citizens being added to the register. One also said the guidance on eligibility was vague.

"Applications to register to vote from EU citizens are taken at face value. However, we do wonder whether all applicants read/understand the HRQ [Historical Residency Question]."

Freedom of Information requests and councillor member queries were also mentioned across two responses.

Delivery of electoral management software functionality

Additional electoral management software functionality was developed to process register to vote applications from EU electors. This functionality was only for Electoral Registration Officers in England and Wales, as the Electoral Office for Northern Ireland maintain their own electoral management software. The majority of Electoral Registration Officer respondents (73%) felt that the additional electoral management software functionality to support processing register to vote applications from EU citizens was effective.

Within free-text comments, a few respondents highlighted that there was "no automated query letter functionality", that letters had been created with errors, and that issues with the electoral management software system had created a burden for manual checks.

Around a quarter of respondents (24%) selected 'electoral management software integration' as one of the most important challenges in delivering the changes to

registering EU citizens under the new criteria. This was the joint fourth most common response. Within the open text responses, some respondents also mentioned electoral management software reporting issues as a challenge.

Problems with electoral management software functionality were also mentioned when respondents were asked if there was 'anything else' to add about changes to voter registration. Challenges included: issues with the letters the electoral management software created; manual work needed to correct electoral management software errors; challenges processing missing nationality/ Historical Residency Question data; and errors whereby electors were not identified in the review. Responses mentioned once included general dissatisfaction in the electoral management software system, and errors in the figures output.

"EMS [electoral management software] not reporting properly so figures/spreadsheets were manually maintained"

"The EMS [electoral management software] supplier we used for the EUVCR process provided in depth step by step training resources, but the software limitations and technical issues with producing notices at various stages caused delays throughout. In some cases, these issues required additional EMS [electoral management software] software patches as some electors were not pulling through the historical check process. These issues were resolved within the period for the review but required a lot of additional workload pressures for the core team"

Overall challenges and enablers in delivering changes to the voter registration processes

Respondents were asked to select the most important challenges and enablers they faced in processing register to vote applications from EU citizens under the new eligibility criteria. For England and Wales, the top three most reported enablers were: 'Association of Electoral Administrators training' (72%); 'electoral management software supplier training' (58%); and 'Electoral Commission guidance' (58%). All other enablers were reported by less than half of respondents. The Electoral Office for Northern Ireland selected the following enablers: 'Electoral Commission guidance'; 'Association of Electoral Administrators training'; and 'New Burdens funding via MHCLG'.

In the survey of Electoral Registration Officers, the top three most reported challenges were: 'lack of public understanding/ voter confusion regarding the new eligibility criteria' (48%) (which was also a key theme when respondents were asked to identify queries/ challenges with the Historical Residency Question); 'pressures of concurrent election work' (43%); and the 'phrasing of the Historical Residency Question' (31%). The Electoral Office for Northern Ireland selected: 'funding constraints'; 'resourcing constraints (overall)'; 'lack of resources for training'; 'time constraints'; 'pressures of other concurrent elections work'; 'phrasing of the Historical Residency Question'; and 'phrasing of the Historical Citizenship Question'.

In total, 19 respondents left free-text comments which mentioned challenges with the Invitation to Register form. Challenges included the design of the Invitation to Register (in terms of its size and clarity) and issues with non-response to nationality questions. Unlike online applications, electors can skip or miss compulsory questions when completing

paper applications. One respondent also said that the Invitation to Register form was difficult to scan in.

“The question on the ITR [Invitation to Register form] was not clear enough and we had a number of forms returned where the nationality question had been missed completely. This took additional time to contact electors, sometimes by post again to confirm nationalities.”

“Even on the new ITR [Invitation to Register form] forms the question is not clear and often missed by applicants”

Other less commonly mentioned challenges included: the timing of the United Kingdom Parliamentary General Election; voter apathy; elector confusion around data sharing across government bodies; complexity of the review; issues with Royal Mail; forms designed by the Electoral Commission; incorrect elector information; confusion between Eligibility Confirmation and Review and the annual canvass; and electoral management software reporting errors. Of these less commonly mentioned challenges, only the timing of the United Kingdom Parliamentary General Election was mentioned more than once across responses.

Impact on Electoral Registration Officer workload

Over half of respondents to the survey of Electoral Registration Officers (54%), reported there had been a ‘moderate increase in workload’ resulting from processing new register to vote applications from EU citizens under the new eligibility criteria. The remainder of respondents (46%) said there had been ‘no change in workload’. The Electoral Office for Northern Ireland reported a ‘large increase in workload’.

3.4 Delivery of changes to the candidacy process

The Elections Act (2022) specifies that EU citizens cannot stand in local polls unless they are qualifying EU citizens or EU citizens with retained rights. So far, Electoral Registration Officers and the Electoral Office for Northern Ireland have reported limited experience of delivering changes to candidacy rights.

Respondents to the survey of Electoral Registration Officers were asked to select the most important challenges they faced when implementing the requirements relating to the candidacy rights of EU citizens. The three most common responses were: no concerns (34%); not applicable (24%); and lack of candidates’ understanding of the rules (23%). The Electoral Office for Northern Ireland responded ‘not applicable’ to this question. None of the challenges was reported by more than half of respondents.

Respondents who selected ‘other’ were asked to describe the challenge experienced in a free-text box. There were nine responses, none of which outlined any challenges. Instead, respondents said they had not experienced issues so far.

“We haven’t had any polls but we are very confident that the information will permeate out correctly and we have already spoken to the main known political parties”

Respondents were also asked to select the most important enablers they had when implementing the requirements relating to the candidacy rights of EU citizens. The three most reported enablers were: Electoral Commission guidance (61%); Association of Electoral Administrators training (49%); and Association of Electoral Administrators support (36%). The Electoral Office for Northern Ireland responded ‘not applicable’ to this question.

There were five open text responses to this question, most of which highlighted there was minimal experience of changing the candidacy rights of EU citizens yet. One comment indicated there had been good support from the ‘main players’, and another said they would read up on the rules ahead of the next elections. Similar themes emerged when respondents were asked if there was ‘anything else’ about the changes to candidacy rights they wanted to add.

“We have only held small/low-profile local by-elections since the general election in 2024 and 2025 is a fallow year, so I don’t feel we have a complete picture yet.”

*“We are getting ready and support has been excellent from the main players - thank you”
“We have not had EU citizens standing as candidates in our elections, so this isn’t something we have come across yet.”*

Impact on Electoral Registration Officer workload

For implementing changes to candidacy rights of EU citizens, the majority of respondents (68%) reported that there had been ‘no change in workload’; the Electoral Office for Northern Ireland also reported that there had been ‘no change in workload’. This likely relates to the fact that Electoral Registration Officers and the Electoral Office for Northern Ireland had limited experience of EU candidates attempting to stand as candidates since the regulations came into effect. Of the remaining respondents, 19% said there had been a ‘moderate increase in workload’ and 14% responded ‘not applicable’.

3.5 Delivery of the eligibility confirmation and review process

The Eligibility Confirmation and Review comprised of a data-based review and the correspondence-based review to identify ineligible electors on the electoral register. In the data-based review, Electoral Registration Officers were able to use existing data to confirm eligibility without the need for the elector to take any action. For example, if an elector had been continuously registered to vote at the same address since before 31/12/2020, this data could be used to confirm their eligibility.

The majority of respondents to the survey of Electoral Registration Officers (89%) said that conducting the **data-based review** was easy. The Electoral Office for Northern Ireland reported that the data-based review was ‘fairly challenging’.

Those who reported that conducting the data-based review was ‘very challenging’ were asked to explain why. Three responses were received, all of which highlighted there were issues with the electoral management software functionality. The responses mentioned that the review did not correctly identify all electors which led to manual work checking each elector and that the electoral management software created incorrect letters.

“The data-based review was initially easy and helpful, until it came to light that the information was not entirely accurate due to an issue with the EMS [electoral management software]. This led to us having to check each elector as some were not picked up in this data-based review when they should have been, causing more workload than expected.”

Where Electoral Registration Officers were unable to confirm elector’s eligibility via the data-based review, the elector was subject to the **correspondence-based review**. This involved contacting the elector to request additional information to confirm their eligibility. To facilitate this, MHCLG developed a service to allow Electoral Registration Officers to contact electors digitally, the elector could then respond to the review digitally using the same service (or respond by paper). Most respondents (91%) said that the integration of the Eligibility Confirmation and Review online response service and their electoral management software was effective (The survey had an error in the response options for this question which reduces the reliability of this data. The ‘fairly ineffective’ response option was mistakenly split into two response options, ‘fairly’ and ‘ineffective’. The responses to the ‘fairly’ and ‘ineffective’ response options have been added together in this analysis). When asked if there was ‘anything else’ about the Eligibility Confirmation and Review respondents wanted to add, a couple of responses mentioned that the MHCLG digital service was helpful.

“Being able to collect responses via the online portal was excellent - it made it very simple for electors to respond and easy for us to process the responses.”

Overall, more than half of respondents (56%) said the correspondence-based review was easy. Of the remaining respondents, 25% said the review was challenging and 19% said the correspondence-based review was ‘neither easy nor challenging’. The Electoral Office for Northern Ireland reported that the correspondence-based review was ‘fairly challenging’.

Those who reported that conducting the correspondence-based review was ‘very challenging’ were asked to explain why. There were four responses which highlighted challenges to engaging electors in the correspondence-based review, and challenges with electoral management software functionality. Challenges with engaging electors included: elector misunderstanding about the purpose of the review; language barriers; and there being a large number of EU electors to reach. Challenges related to the electoral management software functionality included that: the electoral management software did not have capability to send optional reminders to encourage electors to complete the review; and the electoral management software was not flexible enough to log responses if an elector emailed or phoned. One respondent highlighted that issues with the electoral management software meant they had to run two separate correspondence-based reviews. One response more positively highlighted that the telephone canvass element of the correspondence-based review had gone well.

“a lot of electors we contacted were nervous to talk to us as they thought it may affect their immigration status.”

“An issue with the EMS [electoral management software] meant that we had to essentially run two separate correspondence-based reviews, meaning that it was more complex than it should have been. The lack of engagement also made it very challenging”

“canvass and telephoning actually went better than expected - with better response (in terms of how people reacted to canvassers and the response rate) than expected.”

Electors’ general lack of understanding around the Historical Residency Question and Historical Citizenship Question (as mentioned in Section 3.3) also led to queries, with language barriers resulting in subsequent queries and confusion. Some electors made queries because they did not understand why local government did not already hold information on elector’s eligibility, or who had made decision to remove electors from the register. In a couple of cases, respondents noted that staff were accused of racism and experienced harassment. A few others wished to understand more about the impact of being removed from the register on credit rating.

“There is a general lack of understanding about the new EUVCR among the general public - this has potentially been exasperated by language barriers. The whole process was challenging due to a lack of response and understanding from the public's perspective.”

It was expected that the Eligibility Confirmation and Review process should take three months to fully complete. With the deadline being the 31st January 2025, in order to complete the process in time it would have to be started by the 31st October 2024.

Based on monitoring data from the Eligibility Confirmation and Review digital service, 90% of local authorities sent out their first invite prior to the 31st October, but the remaining 10% did not.

The deadline for the completion of the Eligibility Confirmation and Review was subsequently pushed back to the 3rd March 2025, by which time all local authorities had completed their Eligibility Confirmation and Review.

“The timeframe following the UKPGE [United Kingdom Parliamentary General Election] was difficult as [we] wanted to ensure best value for money by combining it with the annual canvass.”

“A poor response rate meant it was slightly more time consuming than anticipated”

Electoral management software functionality and reporting requirements

Additional electoral management software functionality was developed to support the Eligibility Confirmation and Review. This included functionality to allow Electoral Registration Officers to complete the data-based and correspondence-based reviews, functionality to allow the electoral management software to interact with MHCLG digital service, and functionality to report Eligibility Confirmation and Review related data to the EC. It should be noted that there are multiple suppliers of electoral management software.

The majority of respondents (72%) reported that the additional electoral management software functionality to support conducting the eligibility confirmation and review was effective. However, when asked to select the most important challenges with conducting the Eligibility Confirmation and Review, 29% of total respondents selected ‘electoral management software functionality’. This was the fourth most common response.

Those who reported that the additional functionality was 'not at all effective' were asked to explain why. There were two responses, both of which said that manual work was required to check the electoral management software output. Other challenges mentioned were that: it was not possible to send optional reminders; there was no provision that electors may email/ write/ phone in about their eligibility; electors whose eligibility status changed were not automatically removed/ added to the register; and data was not integrated properly into reports.

"electors who submitted a new registration form and changed franchise were not removed from the process automatically - so we had to manually look to see who had changed nationality/ticked the HRQ [Historical Residency Question] box to remove them."

Respondents were also asked if there was 'anything else' about the Eligibility Confirmation and Review which they wanted to add. Of the 20 responses, a number mentioned there were issues with the electoral management software system and that this could have been improved.

"We experienced some issues with EMS [electoral management software] functionality and had problems generating the correct number of letters in the correspondence review for the correct number of electors. Unfortunately, these issues were not resolved and led to time-consuming manual processes to be adopted to stay on timetable. This was important because we are a small team and we were undertaking canvass and boundary review/polling district review concurrently."

After completing the Eligibility Confirmation and Review, Electoral Registration Officers in England and Wales were required to report certain anonymised data to the Electoral Commission. This included reporting the number of electors who were reviewed and the number of electors removed from the register or with changed eligibility (as ineligible electors in Wales can still vote in Senedd and local elections they are kept on the register, but their eligibility for PCC elections is removed).

Despite the challenges with the electoral management software systems, the majority of respondents (82%) said generating the report and providing it to the Electoral Commission was easy. Those who said that generating the report and providing it to the Electoral Commission was 'very challenging' were asked to explain why. There were six responses, all of which mentioned that there were challenges with the electoral management software system, particularly around creating reports and generating figures correctly, if at all.

"EMS [electoral management software] functionality for this project was poor and the most challenging part."

"The reports wouldn't run from our system at all."

In their report on the Eligibility Confirmation and Review, the Electoral Commission highlighted several issues with the quality of the data collected. These include errors in the data collection software created by the electoral management software suppliers; these issues affected the data of 279 of the 315 local authorities that submitted data to the Electoral Commission.

The Electoral Commission also highlighted instances of user error with maintaining the data inside the electoral management software, such as cases where electors appear to have been deleted from the system after they started the correspondence review. Because of these issues, the Electoral Commission chose to publish a short summary of the data, rather than the full underlying dataset.

“Where we are certain the data is accurate, we’ve provided an overview of the ECR [Eligibility Confirmation and Review] process across England and Wales. In some cases, this means excluding groups of local authorities who have been affected by errors and using averages from those where we have accurate data.” – Electoral Commission Eligibility Confirmation and Review Report

Challenges and enablers delivering the Eligibility Confirmation and Review

Respondents were asked to select the most important challenges they faced when delivering the Eligibility Confirmation and Review. The top three challenges most commonly selected were: pressures of other concurrent elections work (48%); lack of public understanding/voter confusion (39%); and time constraints (overall) (31%). The challenges selected by the Electoral Office for Northern Ireland were ‘disenfranchisement of eligible electors’ and ‘ineligible electors remaining on the register’.

Within 18 open text responses, commonly mentioned challenges were: the timing of the General Election/ other elections; low elector engagement and response rate to the Eligibility Confirmation and Review ; difficulties completing the canvass (Some local authorities combined the Eligibility Confirmation and Review and the annual canvass) in terms of recruiting staff and making personal contact with unresponsive electors. A less commonly mentioned challenge was needing more time to complete the Eligibility Confirmation and Review. Challenges mentioned only once across responses included: issues with Royal Mail; issues with EU citizens gaining British citizenship during the review; issues with electoral management software templates; and confusion amongst electors.

Challenges with the Eligibility Confirmation and Review were also identified when respondents were asked if there was ‘anything else’ they wanted to add about the Eligibility Confirmation and Review. Across 20 open text responses, many mentioned there were issues with the electoral management software (please see section above). Less common challenges included: the requirement for a personal visit; the timing of the General Election; elector confusion; and concerns about the accuracy of the Eligibility Confirmation and Review. Challenges mentioned once included: issues with postage costs; response rate; resource; and balancing requirements with other new burdens.

Three improvements to the Eligibility Confirmation and Review were suggested across three responses. These included that: it would have been helpful to have translated letters from the Electoral Commission to help with the Eligibility Confirmation and Review ; that better electoral management software developments could have been made; and that it would have been helpful if the public had more information about why EU electors cannot vote in local elections.

“ [there] needs to be more information put out nationality of why people now can't vote in local elections”

Respondents were also asked to select the most important enablers when completing the Eligibility Confirmation and Review. The most commonly mentioned enablers were: Association of Electoral Administrators training (66%); Electoral Commission guidance (60%); electoral management software supplier training (51%); and Association of Electoral Administrators support (51%). All other enablers were selected by less than a third of respondents. The Electoral Office for Northern Ireland selected 'MHCLG support' and 'New Burdens funding via MHCLG' as the most important enablers. Within the free-text box, Association of Electoral Administrators colleagues and the Gov.Notify service were said to be key enablers.

Enablers were also identified when respondents were asked if there was 'anything else' about the Eligibility Confirmation and Review that they wanted to add. Fewer enablers were mentioned than challenges, however a couple of responses mentioned that the Eligibility Confirmation and Review went well, and that the online portal/ response service was helpful. Enablers mentioned once included: personal contact via the phone; and the ability to use local data.

"we found the process ran very smoothly here once we understood the requirements which were very clearly explained by the Electoral Commission. Our EMS [electoral management software] dealt with the new requirement very well and provided an easy way for us to deliver the project. [The] ability to use local data helped a lot."

Impact on Electoral Registration Officer workload

The majority of respondents (61%) reported that the eligibility confirmation and review had increased their workload 'as much as expected'. Of the remaining respondents, 20% reported their workloads had increased more/ much more than expected (18% and 3% respectively). 19% of respondents said that their workload had increased 'less/ much less' than expectations (15% and 4% respectively). The Electoral Office for Northern Ireland reported that workloads had increased 'more than expected'.

3.6 Engagement with electors

When asked whether they had done any communications or outreach beyond that required by legislation, a number of respondents confirmed that no further communications had taken place, with resource cited as a barrier to further communications in two responses. The Electoral Office for Northern Ireland explained that EUVCR is hard to implement and that the law is complex for electors and administrators.

"No we didn't - we had no capacity to do this" (Electoral Registration Officers survey)

Where respondents did describe outreach beyond that required by EUVCR regulations, common ways of communicating EUVCR included: sharing information on council webpages/ websites; sending emails; sending reminders to electors; using social media; and using adverts in local media (including local TV, bulletins and newspapers).

"We ensured that there was a detailed article in the council's magazine distributed to all households, used social media, emailed all those with email addresses on our database and updated our [website]."

Less common ways of communicating EUVCR were: targeted/ specialised communications (such as sharing information in foreign language newspapers and using targeted social media posts); sending text reminders; GOV.Notify; and making phone calls.

A minority of responses mentioned communication and outreach about EUVCR during local authority activities including the annual canvass and the Eligibility Confirmation and Review door knock. Some respondents also spoke about sharing information with councillors in their briefings and nomination packs. Less common responses included sharing information with those working in community engagement, and the customer services team.

“We also held a member briefing for all elected councillors, which covered (among other things) the changes introduced by EUVCR, how it would affect their constituents and what they could do to advise residents while canvassing or holding surgeries.”

4. Claim 2: Eligible EU citizens are able to register for, vote in, and stand as candidates in local and PCC elections and are not deterred from doing so.

Shown below in table 4.1 below is a summary of the outcome for claim 2.

Table 4.1: Outcome summary for claim 2.

Claim Outcome	Claim Conclusion
Claim partially met	There is strong evidence that eligible EU electors are still able to register to vote. There is no conclusive evidence as to whether eligible EU citizens have been able to vote or stand in local elections. However, the comparable number of register to vote applications, suggest electors are not deterred from doing so

It should be noted that this claim was rated as partially met due to lack of evidence in key areas rather than due to any evidence suggesting the claim has not been met.

There is strong evidence that eligible EU electors can register to vote, with the number of applications in the year following the implementation of the policy matching that of the year prior.

Due to a small sample size of EU electors reporting either having voted or not voted in the 2025 local elections in England, it was not possible to evaluate the impact of the policy on turnout.

Due to only a limited number of elections having taken place, and a lack of data on the nationality of candidates standing, it is not possible to evaluate whether eligible EU electors are still able to stand as candidates.

There is no direct evidence on whether eligible electors have been deterred from participating in the democratic process. However, a comparable number of register to vote applications in the year prior and after the policy was implemented suggests that eligible EU electors haven't been deterred from attempting to register to vote or potentially the wider democratic process.

4.1 Claim summary

This claim examines the extent eligible EU electors remain able to participate in elections they are eligible to vote in, and their awareness of the EUVCR policy.

Alongside this, eligible EU electors should not be deterred by the policy from participating in the democratic process.

For this claim to be met, eligible electors should be able to register to vote, vote and stand as candidates in relevant elections, and not deterred from doing so.

4.2 Elector awareness of EUVCR

Information on the new eligibility requirements was made available on GOV.UK (for [Local Government](#) and [PCC](#) elections) and the [Electoral Commission](#) websites. Alongside this, some local authorities engaged with electors to make them aware of the policy, as described in Section 3.6.

In total, 500,000 invites were sent to electors subject to correspondence-based review, making them aware that they were required to provide information to their Electoral Registration Officer to allow their eligibility to be assessed. Further communications were sent to electors at different stages of the Eligibility Confirmation and Review to inform electors if their eligibility had been confirmed or changed, or if they were removed from the register. The data on correspondence sent by Electoral Registration Officers to EU electors were collected as part of the Electoral Commission Eligibility Confirmation and Review Monitoring Data, but the Electoral Commission chose not to include this data in their publication due to concerns about the data quality.

As EU citizens only represent a small proportion of the population, it was not proportionate to conduct any direct research with EU electors. Therefore, it is not possible to say to what extent EU electors were aware of the changes to the franchise and the Eligibility Confirmation and Review.

4.3 Impact on voter registration for EU electors

In the year prior to the implementation of the change to EU voting rights (6th May 2023 to 6th May 2024), there were 380,000 register to vote applications in England, Wales and Northern Ireland where the applicant had a EU5 or EU19 nationality (but no UK, Irish or Commonwealth nationality).

It should be noted that this data only covers online applications, as data on nationality is not recorded for paper-based applications in the administrative data. Over this period, 89.6% of all applications were made online.

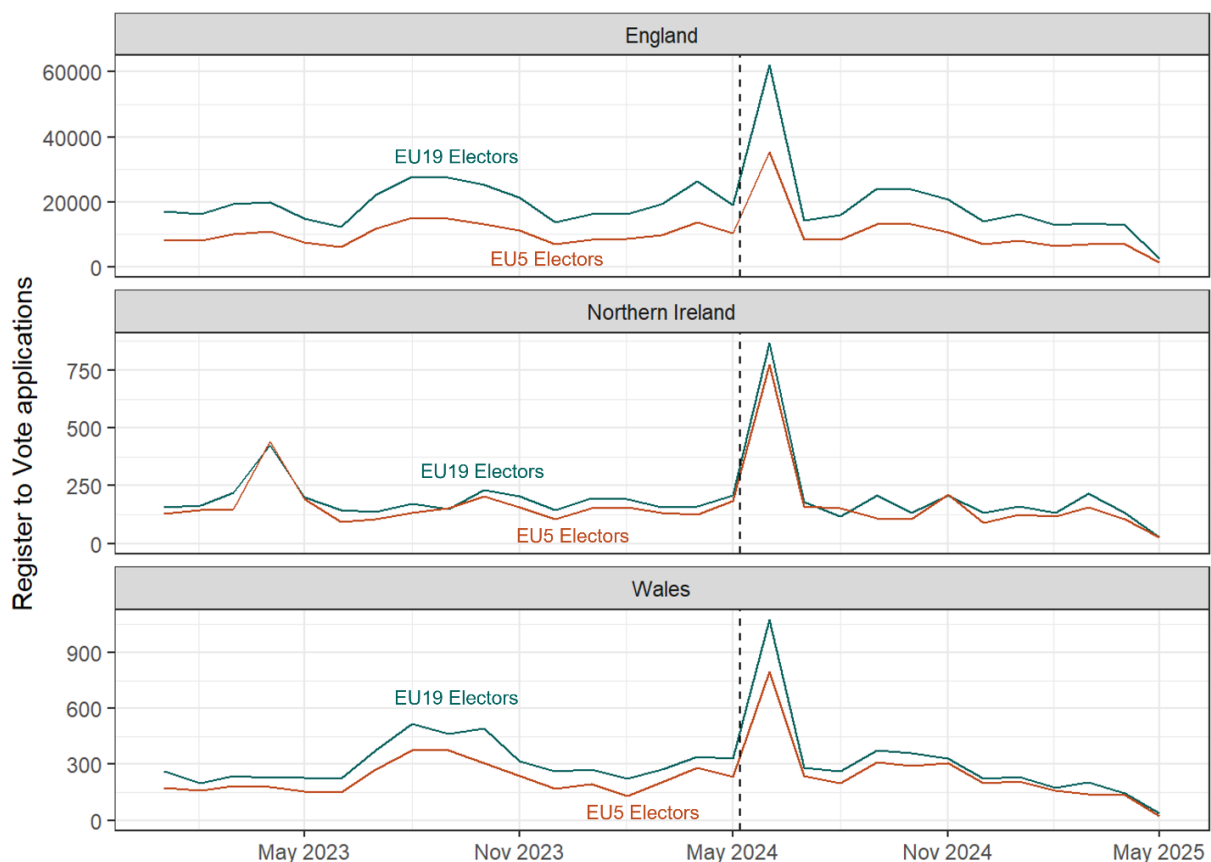
In the year following the implementation of the change to EU voting rights (7th May 2024 to 7th May 2025), there were 392,000 applications to register to vote in England, Wales and Northern Ireland from applicants with an EU5 or EU19 nationality, whose responses to the Historical Residency Question and Historical Citizenship Question indicate they would be eligible under the new requirements.

For EU5 electors there were 131,000 applications in the year prior to change and 139,000 in the year following. While for EU19 electors there were 249,000 applications in the year prior to change and 254,000 in the year following.

It should be noted that the 2024 General elections led to a spike in applications in June 2024, as shown in the chart below. Even though EU electors cannot vote in General Elections, the increased interest in elections and voter registration may have led to an increased number of registrations. Even considering this, the change in voting rights has had minimal effect on the number of applications to register from eligible EU electors compared to the year prior to the implementation of the policy.

The chart below in figure 4.1 shows the number of online applications from eligible EU electors in England, Wales and Northern Ireland per month between January 2023 and May 2025. The dotted vertical line represents the EUVCR implementation date (07/05/2024).

Figure 4.1: Online Register to Vote applications from eligible EU5 and E19 citizens.



Source: MHCLG Register to Vote Monitoring Data

The chart shows 3 separate line graphs, one for England, Wales and Northern Ireland. In England, the plot shows applications from EU19 electors are steady at around 20,000-30,000 per month but spiking in May 2024 to 60,000 per month. For EU5 electors, applications are steady at around 10,000 per month but spiking in May 2024 to 30,000 per month.

In Northern Ireland, the plot shows applications from both EU19 and EU5 electors are steady at around 100 per month but spiking in May 2023 and 2024 to 400-450 and 750-900 per month respectively.

In Wales, the plot shows applications from EU19 and EU5 electors are steady at around 200 - 600 per month but spiking in May 2024 to 1,100 per month.

4.4 Impact on voting for EU electors

To evaluate the impact of the policy on EU electors, data from the British Election Study Internet Panel was analysed. The British Election Study Internet Panel is an academic survey of political attitudes and behaviours in Great Britain which surveys a large sample (around 30,000 people) following major elections.

While the British Election Study Internet Panel provides rich and detailed data, it also has some limitations. As a long-term panel, the British Election Study Internet Panel may include participants who are more politically engaged than the wider public, potentially leading to an overestimate of turnout levels.

Waves 25, 26 and 30 were used, corresponding with the 2023, 2024 and 2025 local elections in England. It should be noted that no elections (excluding any by-elections) in which the EUVCR policy applies have taken place in Wales or Northern Ireland since the policy came into effect. Self-reported turnout in local elections across these three waves was compared among respondents who reported their country of birth as an EU country, and indicated they were not eligible to vote in general elections. The estimated turnout in 2025 is reported to be lower than in either 2023 or 2024. However, there is no statistically significant difference in the turnout in 2025 compared to either 2023 or 2024, largely due to the small sample size in 2025. This is likely to be a consequence of less scheduled elections in 2025 than 2024 or 2023. Ultimately, the sample size is too small to be able to properly evaluate the impact of EUVCR on voting for EU citizens.

4.5 Impact on candidacy for EU electors

There is no available evidence on the nationality of those who stood for election in the 2025 local elections. Because of this it is not possible to assess the impact of the policy on eligible EU citizens standing in elections.

The survey of Electoral Registration Officers and the Electoral Office for Northern Ireland also indicates that there has been limited experience of implementing changes to candidacy rights.

“We have not had EU citizens standing as candidates in our elections, so this isn’t something we have come across yet.”

4.6 Deterrence from registering, voting and standing in elections

Without conducting any direct research with EU electors, it is not possible to comprehensively evaluate if eligible EU electors have been deterred from participating in the democratic process.

Evidence from Section 4.3 shows that the number of register to vote applications from eligible EU citizens has not changed since the policy came into effect. This suggests that eligible EU citizens have not been deterred from attempting to register to vote.

Due to a lack of evidence, it is not possible to look for similar effects in voting and standing in elections.

5. Claim 3: The franchise reflects the UK's new relationship with the EU.

Shown below in table 5.1 below is a summary of the outcome for claim 3.

Table 5.1: Outcome summary for claim 3.

Claim Outcome	Claim Conclusion
Claim partially met	There is evidence that the franchise has been changed to reflect the intention of the EUVCR policy. There is strong evidence that ineligible EU electors in England and Northern Ireland are deterred from attempting to register to vote, while those in Wales are still able to register for elections they can vote in. There is mixed evidence that the policy will lead to a long-term reduction in Electoral Registration Officer workload.

It should be noted that this claim was rated as partially met due to lack of evidence in key areas rather than due to any evidence suggesting the claim has not been met.

There is evidence that eligible electors have been retained on the register as part of the Eligibility Confirmation and Review, and that ineligible electors have been removed from the register. Electoral Registration Officers have the power to seek further information from an elector if necessary. However, some Electoral Registration Officers explained that they felt they were unable to check the accuracy of elector responses to the Eligibility Confirmation and Review. There is no evidence from the data or from Electoral Registration Officers of any ineligible electors being retained on the register.

There is strong evidence that ineligible EU electors in England and Northern Ireland are deterred from attempting to register to vote, as the proportion of digital applications that are from ineligible electors is low. While in Wales this proportion is higher, as EU citizens who are ineligible for reserved elections are still able to register for devolved elections. The majority of the Electoral Registration Officers in England and Wales found that implementation of the policy did not increase their workload more than expected. However, the Electoral Office for Northern Ireland reported that their workload had increased more than expected.

The number of register to vote applications has remained at a comparable level as to before the policy was implemented. As a proportion of the electorate, the reduction in the number of registered voters was very small. These factors suggest that in the long-term there will only be a marginal reduction in workload for Electoral Registration Officers due to the change in the franchise.

5.1 Claim summary

This claim examines the extent to which the franchise has changed in line with the objective of the policy.

For this claim to be met, eligible electors have been retained on the register as part of the Eligibility Confirmation and Review, while those that are ineligible have been removed. Those who are ineligible in England and Northern Ireland should also be discouraged from attempting to register to vote.

As a consequence of the policy there is expected to be a reduction in workload for Electoral Registration Officers (all other things kept the same), due to fewer registered electors.

5.2 Impact on the electoral register

Due to issues with the quality of the data, only a limited summary of the monitoring data collected during the Eligibility Confirmation and Review was published by the Electoral Commission. Based on this summary, 2.2 million EU citizens in England and Wales were subject to the Eligibility Confirmation and Review.

72% of electors subject to the Eligibility Confirmation and Review had their eligibility confirmed during the data-based review. Those not confirmed in the data-based review were subject to the correspondence-based review.

Approximately 50% of those subject to the correspondence-based review responded providing information that they were still eligible to be registered, with the remaining 50% either not responding or providing information that they were ineligible.

Following the completion of the Eligibility Confirmation and Review, there were 10% fewer EU electors on the register compared to the start of the Eligibility Confirmation and Review, roughly a reduction of 200,000 electors. The Electoral Office for Northern Ireland was not required to submit monitoring data to the Electoral Commission but provided a limited summary of their review alongside their survey submission. The Electoral Office for Northern Ireland reported that their data-based review identified around 35,000 electors who had EU nationality, of which around 1,000 had their registration formally reviewed. Of this 1000, around 300 people were removed from the register.

“We undertook a database review and found c35,000 electors who had EU nationality. Of these only c1,000 had to have their status formally reviewed by letter/online. We developed an online platform to manage the responses and 700 responded and were retained - the remaining 300 were removed from the electoral register.”

11% of respondents to the survey of Electoral Registration Officers raised concerns that ineligible citizens may be being retained and/or added to the register. The Electoral Office for Northern Ireland selected ‘ineligible citizens remaining on the register’ as one of their top challenges of completing the Eligibility Confirmation and Review. Meanwhile, 19% of Electoral Registration Officers in England and Wales selected ‘accuracy of the register,

including identifying ineligible applications' as their top challenge of processing register to vote applications from EU citizens.

Electoral Registration Officers have the power to seek further information from an elector applying to Register to Vote if they deem it necessary. However, some respondents explained that they felt they were unable to check the accuracy of elector responses to the Historical Residency Question, which could have led to ineligible citizens being added to the register.

"I have [a] concern that those who failed and reapplied have done so saying they are British and this may not be true."

It is worth noting that there is no evidence or reported cases among the survey responses of any ineligible electors remaining on the electoral register.

5.3 Impact on ineligible EU citizens

In the year following the implementation of the policy there were 258,000 online applications in England, Wales and Northern Ireland where the applicant was asked the Historical Residency Question. This question is asked to determine if the applicant is eligible to vote under the new regulations.

In 98.4% of these applications, the applicant responded "Yes" to the Historical Residency Question, suggesting that they are eligible to vote under the new regulations as being an EU19 elector. The remaining 1.6% responded "No", to the Historical Residency Question, suggesting that they are not eligible to vote under the new regulations.

Of these 258,000 applications, 4,000 were also asked the Historical Citizenship Question to determine their eligibility. In 95.2% of these applications responded "No", to the Historical Residency Question, suggesting that they are eligible to vote under the new regulations. The remaining 4.8% responded "No", to the Historical Residency Question, suggesting that they are not eligible to vote under the new regulations.

Combining these figures together, 254,000 of the applications from EU19 electors (98.4% of all applications from EU19 electors) were answered in a way that suggest the applicant is eligible to vote. Of all applications from EU electors (including EU5 electors), 392,000 (98.9% of all applications) were answered in a way that suggest the applicant is eligible to vote.

This means that a very small proportion of applications came from electors who are no longer eligible to vote, suggesting that ineligible electors are broadly discouraged from attempting to register to vote.

In Wales, electors who are no longer eligible to vote in PCC elections remain eligible to vote in local government and Senedd elections.

In Wales, 4.6% of electors responded "No" to the Historical Residency Question (compared to 1.5% in England), and 10.9% responded "Yes" to the Historical Citizenship Question (compared to 4.7% in England). In total, 4.7% of applications from EU19 electors in Wales were completed in a manner suggesting that they would be ineligible,

compared to 1.6% in England. Of all applications in Wales (including EU5 electors), 2.7% were completed in a manner suggesting that they would be ineligible, compared to 1% in England. This suggests that in Wales electors who are ineligible to vote in PCC elections are not discouraged from registering to vote in elections they are able to vote in.

5.4 Impact on medium- and long-term local authority workload

As covered in Section 4.3, the number of register to vote applications in the year prior to the policy implementation was comparable to that in the year after implementation. This suggests that there is unlikely to be a reduction in Electoral Registration Officer workload relating to processing applications to Register to Vote, as the level of applications received from EU electors has broadly remained the same.

200,000 electors in England and Wales were removed from the register or made ineligible to vote in PCC elections. All other things remaining the same, this suggests there could be a reduction in workload relating to the conduct of elections as a consequence of the policy, for example less poll cards or postal ballot may need to be issued. Alongside this the population of EU citizens that have retained rights will only decrease with time. However, any impact on workload is likely to be marginal as 200,000 electors represents 0.5% of all registered electors as of December 2023.

As no new bilateral voting and candidacy rights treaties have been signed since the policy was implemented, it is not possible to say to impact this would have on Electoral Registration Officer workload.

6. Economic Evaluation

As it is not possible to monetise many of the impacts of the EUVCR policy, it is not possible to use a cost-benefit approach for the economic evaluation of the policy. Instead, a cost-consequence method is used. This is the same approach used in the year 2 Electoral Integrity Programme evaluation. In this approach the costs and consequences of the policy are presented in their own units. The reader can then make a value judgement on the relative importance of costs and impacts of the policy.

In order to deliver the policy MHCLG provided funding to local authorities. Funding was provided for three areas:

1. *Staff costs* - £4.5m of funding provided.
2. *Communication costs* - £1.0m of funding provided.
3. *Registration training* - £0.2m of funding provided.

In total £5.6m in funding was provided to local authorities and the Electoral Office for Northern Ireland by MHCLG to deliver the EUVCR policy.

These costs all primarily related to claim 1 *“Local authority staff in electoral service teams and Electoral Registration Officers meet the requirements of law”*, as this claim primarily related to the implementation of policy. However, the funding also had a secondary impact for claims 2 and 3.

As claim 2 *“Eligible EU citizens are able to register for, vote in, and stand as candidates in local and PCC elections and are not deterred from doing so”* relates to registration of EU electors, the funding for registration training will also have had an impact here. This funding equates to £0.71 per online application from an EU19 elector (as the register to vote application process has not changed for EU5 electors). It should be noted that this figure only covers applications submitted in the year following policy implementation. There will be benefit from the training for applications from EU electors submitted after this point too.

Claim 3 *“The franchise reflects the UK’s new relationship with the EU”*, relates to the impacts of the completion of the Eligibility Confirmation and Review, therefore the funding for staff and communication costs for the Eligibility Confirmation and Review will also have an impact for this claim. The funding equates to approximately £2.44 per elector subject to the Eligibility Confirmation and Review.

7. Conclusion

Overall, as evidenced with one claim being met and two partially met, the policy was delivered by local authorities effectively and the franchise was changed in line with the objectives of the policy.

There is evidence that local authority staff and Electoral Registration Officers met the requirements of law. However, there is limited experience of EU candidates attempting to stand in elections, so more time (and further elections) are needed to evaluate the delivery to changes to candidacy rights.

There is evidence that England and Wales were prepared to deliver the EUVCR measures. There is also evidence that the Electoral Office for Northern Ireland were prepared to deliver most aspects of the policy, but felt less prepared in relation to changes to the register to vote process, which may have contributed to the Electoral Office for Northern Ireland finding the overall delivery of EUVCR 'fairly challenging'.

However, implementation of the policy was hampered by issues with some of the software developed by some of electoral management software vendors and the data reporting that supported the process. This led, in some cases, to more manual work and an increased burden on some Electoral Registration Officers. Reporting on the Eligibility Confirmation and Review process was also limited by issues with data collection.

The evidence suggests that eligible electors remain able to register to vote. However, the evidence on whether eligible electors have been able to vote in local elections is inconclusive, due to small sample sizes. There is currently no evidence to assess whether eligible electors are deterred from standing as candidates. There is evidence that ineligible electors in Wales remain able to register to vote for elections they can vote in.

Monitoring data suggested that the number of registered EU electors fell by 200,000, adjusting the franchise in line with the objectives of the policy. However, some concerns were raised that there was no way to verify the information provided by electors during the review.

Based on the available evidence, it was assessed that claim 1 was met and claims 2 and 3 were partially met. While claims 2 and 3 are rated as partially met, this decision was based on a lack evidence in key areas rather than due to any evidence suggesting the claims had not been met.

8. Annex

8.1 Glossary of terms

Table 8.1 below contains a glossary of acronyms relating to the EUVCR policy and this evaluation.

Table 8.1: Glossary of acronyms used in evaluation.

Acronym	Definition
ECR	Eligibility Confirmation and Review
EMS	Electoral Management Software
EU	European Union
EUVCR	European Union Voting and Candidacy Rights
EU5	Denmark, Luxembourg, Poland, Portugal, Spain
EU19	Austria, Belgium, Bulgaria, Croatia, Czechia, Estonia, Finland, France, Germany, Greece, Hungary, Italy, Latvia, Lithuania, Netherland, Romania, Slovakia, Slovenia, Sweden
HCQ	Historical Citizenship Question
HRQ	Historical Residency Question
ITR	Invitation to Register
MHCLG	Ministry of Housing, Communities & Local Government
PCC	Police and Crime Commissioner
UKPGE	United Kingdom Parliamentary General Election

8.2 Research Questions

Listed below are the research questions considered in this evaluation.

Process Questions

1. How did Electoral Registration Officers and the Electoral Office for Northern Ireland approach the implementation of the policy, e.g. organisation, resourcing, lead in times?
2. What barriers or challenges did Electoral Registration Officers and the Electoral Office for Northern Ireland face in implementing the policy?
3. What enablers helped Electoral Registration Officers and the Electoral Office for Northern Ireland to implement the policy?

4. How effective was the training and guidance provided to Electoral Registration Officers and the Electoral Office for Northern Ireland to support implementing the policy?
5. How has implementing the policy impacted on Electoral Registration Officers' and the Electoral Office for Northern Ireland workload?
6. How have local authorities and the Electoral Office for Northern Ireland communicated changes in voting rights to EU electors?
7. To what extent do Electoral Registration Officers and the Electoral Office for Northern Ireland feel confident in delivering the policy?
8. Have Electoral Registration Officers and the Electoral Office for Northern Ireland implemented the policy in line with guidance/ legislation?
9. How easy or challenging did Electoral Registration Officers and the Electoral Office for Northern Ireland find implementing the EUVCR policy?
10. How easy or challenging did Electoral Registration Officers and the Electoral Office for Northern Ireland find the eligibility confirmation and review?
11. How effective did Electoral Registration Officers find the MHCLG Eligibility Confirmation and Review digital service and electoral management software integration/functionality?
12. How often did Electoral Registration Officers and the Electoral Office for Northern Ireland have to deal with queries around the impact of EUVCR and the Historical Residency Question on people with dual nationalities?

Impact Questions

Impact on EU Electors

13. How has the policy impacted the number of EU citizens residing in England and Wales who are registered to vote?
14. How has the policy impacted the number of EU citizens residing in Northern Ireland who are registered to vote?
15. How have the policy changes impacted voter registration of EU citizens for local and PCC elections?

16. How many electors have responded to the historical residency and Historical Citizenship Questions during the register to vote process?

17. How have the policy changes impacted turnout in local and PCC elections for EU citizens?

Impact on Electoral Sector

18. How have the changes impacted Electoral Registration Officer workload post-implementation?

8.3 Theory of change

Shown below is the theory of change for model for the EUVCR policy developed for this evaluation. This is shown both in text format below and as an image in figure 8.1.

The theory of change is made up of 5 sections:

Inputs - What is needed for the intervention to take place?

Primary and secondary legislation to introduce changes to rights of EU citizens residing in the United Kingdom.

Funding to local authorities to cover cost of de-registration of ineligible EU citizens.

Funding to local authorities to cover cost of communicating changes to EU citizen voting and candidacy rights.

Digital platform (developed by Ministry of Housing, Communities and Local Government) allowing relevant EU citizens to respond to a question designed to determine their continuing eligibility.

Changes to the existing Register to Vote service to determine eligibility of EU citizens under new criteria.

Activities: Activities, actions and processes to take place to underpin effective delivery.

Local authorities staff provided training (by the Association of Electoral Administrators) and guidance (from the Electoral Commission) on change in eligibility requirements of EU citizens and exceptions for citizens from Ireland/Commonwealth + EU Member States with which United Kingdom has a bilateral agreement.

Local authorities carry out eligibility confirmation review using digital platform and paper forms.

Local authorities carry out contact procedure (developed by the Electoral Commission) to make already registered EU citizens aware of the changes, and to seek information where necessary, using repeated and varied methods. Therefore, mitigating the risk of eligible individuals being removed from the register.

Local authorities use guidance developed by the Electoral Commission to determine the eligibility of relevant EU citizens who are already registered to vote.

Clear updates to information on gov.uk and elsewhere to set out the new eligibility requirements for individuals registering to vote.

Local authorities staff provided training (by the Association of Electoral Administrators) and guidance (from the Electoral Commission) following new changes to EU citizens' rights as a result of any new bilateral agreements with EU Member States.

Outputs - Quantifiable deliverables resulting from the intervention activities.

Local authorities are able to access information about franchise changes and revise the register post implementation and as new voting and candidacy rights agreements are signed.

Increased local authority workload post-implementation as EU citizens de-registered (short-term).

EU citizens residing in the United Kingdom are aware of their continued/changing voting and candidacy rights.

Outcomes - Early 'consequential changes' from the outputs and activities.

De-registration of ineligible EU voters from the register leads to reduction in number of EU citizens registered for local elections (England + Northern Ireland) and Police and Crime Commissioner elections (England + Wales).

Reduction in registration renewals and reduced local authority workload (medium-term) and as a by-product lower cost of local and Police and Crime Commissioner elections.

Eligible EU citizens are not deterred from registering to vote and voting in local elections, or standing as candidates.

Ineligible EU citizens are deterred from trying to register, vote or stand in local elections.

Ineligible EU citizens in Wales remain able to register, vote or stand in local elections in local and Senedd elections.

EU citizens who are in office at the time of the legislative implementation remain in office to the end of their term.

Impacts - Longer 'consequential change' to meet the long-term goals.

EU citizens with voting/candidacy rights are able to participate/stand in local elections while ineligible EU citizens are unable to register/vote or stand.

Long-term net reduction in registered EU citizens as over time fewer EU citizens who arrive prior to Implementation Period Completion Date still reside in the United Kingdom.

Small increase in local authority workload if new voting and candidacy rights agreements are signed (but still overall net reduction) (long-term).

Figure 8.1: Theory of change for EUVCR policy.



8.4 Claim Pathways

Shown below are the claim pathways for the 3 contribution claims:

Claim 1: Local authority staff in electoral service teams, Electoral Registration Officers and the Electoral Office for Northern Ireland meet the requirements of law.

Inputs

Primary and secondary legislation to introduce changes to rights of EU citizens residing in the United Kingdom.

Funding to local authorities to cover cost of de-registration of ineligible EU citizens.

Funding to local authorities to cover cost of communicating changes to EU citizen voting and candidacy rights.

Digital platform (developed by Ministry of Housing, Communities and Local Government) allowing relevant EU citizens to respond to a question designed to determine their continuing eligibility.

Changes to the existing Register to Vote service to determine eligibility of EU citizens under new criteria.

Activities

Local authorities staff provided training (by the Association of Electoral Administrators) and guidance (from the Electoral Commission) on change in eligibility requirements of EU citizens and exceptions for citizens from (Ireland/Commonwealth + EU Member States with which United Kingdom has a bilateral agreement)).

Local authorities carry out eligibility confirmation review using digital platform and paper forms.

Local authorities carry out contact procedure (developed by the Electoral Commission) to make already registered EU citizens aware of the changes, and to seek information where necessary, using repeated and varied methods. Therefore, mitigating the risk of eligible individuals being removed from the register.

Local authorities use guidance developed by the Electoral Commission to determine the eligibility of relevant EU citizens who are already registered to vote.

Local authorities staff provided training (by the AEA) and guidance (from the Electoral Commission) following new changes to EU citizens' rights as a result of any new bilateral agreements with EU Member States.

Outputs

Local authorities are able to access information about franchise changes and revise the register post implementation and as new voting and candidacy rights agreements are signed.

Increased local authority workload post-implementation as EU citizens de-registered (short-term).

Claim 2: Eligible EU citizens are able to register for, vote in and stand for local and PCC elections and are not deterred from doing so.

Activities

Clear updates to information on gov.uk and elsewhere to set out the new eligibility requirements for individuals registering to vote.

Outputs

EU citizens residing in the United Kingdom are aware of their continued/changing voting and candidacy rights.

Outcomes

Eligible EU citizens are not deterred from registering to vote and voting in local elections, or standing as candidates.

Impacts

EU citizens with voting/candidacy rights are able to participate/stand in local elections while ineligible EU citizens are unable to register/vote or stand.

Claim 3: The franchise reflects the UK's new relationship with the EU

Outcomes

De-registration of ineligible EU voters from the register leads to reduction in number of EU citizens registered for local elections (England + Northern Ireland) and Police and Crime Commissioner elections (England + Wales).

Reduction in registration renewals and reduced Local Authority workload (medium-term) and as a by-product lower cost of local and Police and Crime Commissioner elections.

Ineligible EU citizens are deterred from trying to register, vote or stand in local elections they are ineligible for.

Ineligible EU citizens are deterred from trying to register, vote or stand in local elections they are ineligible for.

EU citizens who are in office at the time of the legislative implementation remain in office to the end of their term.

Impacts

Long-term net reduction in registered EU citizens as over time fewer EU citizens who arrive prior to Implementation Period Completion Date still reside in the United Kingdom.

Small increase in Local Authority workload if new voting and candidacy rights agreements are signed (but still overall net reduction) (Long-term)