

# Automatic Voter Registration and the Elections Bill

A joint briefing paper by Hogan Lovells and the  
Patchwork Foundation

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# Introduction

## About us

Patchwork Foundation (“**Patchwork**”) is a UK charity which promotes the active participation of young people from disadvantaged and minority backgrounds in British democracy and civil society.

Hogan Lovells is a global law firm, operating at the intersection of business and government.

**We have come together, as a team of young voters, because we believe that we can do more to improve voter registration in the UK.**

## Our Aim

The Elections Bill represents an important opportunity to modernise and improve our electoral process. Voter registration, and in turn participation, is essential to the positive functioning of a representative democracy.

The current system of voter registration, however, is not working. In December 2018, between 8.3 and 9.4 million people in Great Britain who were eligible to be on the local government registers were not correctly registered.<sup>1</sup> Voter registration rates are also disproportionately low among young people and other minority groups.

**We believe that the Elections Bill should and could do more to address this, including by way of automatic voter registration ("AVR"). We believe AVR is the way forward for the following reasons:**

- (a) AVR can improve registration rates, and in turn voter engagement, for under-registered groups and across the wider population;
- (b) AVR has a proven track record in comparative jurisdictions; and
- (c) independent studies show that AVR can feasibly be implemented in the UK and build on existing systems as part of the UK's levelling-up programme.

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## Change is needed

The current voting system has resulted in the under-representation and participation of minorities groups. The voting infrastructure and, importantly, the officials who manage it, are under significant strain. However, despite their best efforts, the UK's patchwork of 372 local electoral registers remain incomplete and inaccurate. AVR represents a proven way to remedy these challenges.

### Under-registered groups

Recent studies have highlighted a long-term trend of falling registration rates for young people. Research published by the Electoral Commission in 2019 on the completeness of the electoral register found that:

- (a) the lowest level of completeness according to age group was observed for attainers at 25% (compared with 94% for those aged over 65), down from 45% in 2015<sup>2</sup>. It was also reported that the introduction of the individual electoral registration ("IER") system in 2014<sup>3</sup> had led to a significant decline in the registration rate for attainers;<sup>4</sup>
- (b) levels of completeness were lower among members of ethnic minorities (e.g. Asian 76%, Black 75% and mixed 69%) when compared with voters from a white ethnic background (84%);<sup>5</sup> and
- (c) levels of completeness differed across socio-economic groups, with the level of completeness among C2 and DE householders being the lowest (80%) compared to AB householders (86%).<sup>6</sup>

### Confusion about how the system works

There is also confusion among eligible voters about how and when to register.

In a survey conducted by the University of East Anglia in 2016, two-thirds of Electoral Registration Officers ("EROs") reported that citizens had complained to them about the voting registration process being bureaucratic after the transition to IER and that this discouraged them from registering.<sup>7</sup>

Surveys of poll workers have also found that the most common problem they encounter is citizens asking to vote when they are missing from the electoral register. 52% of those surveyed reported having experienced this issue, with suspected cases of electoral fraud at the bottom of the list (only 1% of poll workers reported this as a problem).<sup>8</sup> These results are corroborated by the Electoral Commission's data on electoral fraud. Of the 595 cases of alleged electoral

fraud investigated by the police in the context of the 2019 General Election, only four led to a conviction, with two individuals being given a police caution.<sup>9</sup> By comparison, two-thirds of polling stations were found to have turned away at least one voter at the 2015 General Election.<sup>10</sup>

Further, a poll conducted by YouGov prior to the 2019 General Election found that 16% of respondents believed that individuals were automatically registered to vote if they paid council tax, and 17% of respondents believed individuals were automatically registered to vote when they turn 18.<sup>11</sup>

Even among those who are familiar with the registration process, many do not know the deadline for registration. YouGov's pre-2019 General Election survey found that 14% of respondents mistakenly believed they could still register to vote after the deadline for registration had passed.<sup>12</sup> Similarly, 186,000 individuals were found to have applied after the deadline to register to vote in the 2015 General Election.<sup>13</sup>

### Unequal participation in the democratic process

Worrying trends in voter registration are consistent with voter participation data from the 2019 General Election. Turnout was significantly lower among younger people (only 54% of 18-24 and 25-34-year olds turned out to vote), compared with older age groups (in particular people over 65, 77% of whom voted in the election).<sup>14</sup>

These figures are in line with the turnout at the 2015 and 2017 General Elections which ranged from 40-50% among young voters to over 80% among older voters (i.e. a turnout gap of 30-40%).<sup>15</sup> This age gap in the turnout rate has significantly increased over time. According to the Institute for Public Policy Research, the turnout gap between 18-24-year-olds and those aged over 65 stood at only 18% in 1970.<sup>16</sup> The same study found that Britain currently has "*one of the greatest imbalances of voting power between young and old voters*" in Europe.<sup>17</sup>

Similarly, turnout in the last three general elections among voters from ethnic minority groups has been consistently lower than that of white voters (between 53-59% vs. 67-70%).<sup>18</sup>

These discrepancies have serious implications. As social studies have shown, voting habits are developed at a young age and citizens who fail to vote

in their first election are much less likely to develop the habit as they get older.<sup>19</sup> It is therefore critical that young people are registered and encouraged to vote to increase the likelihood that they will continue to participate in the democratic process throughout their lives.<sup>20</sup>

### **Pressures on the voting infrastructure and EROs**

The current electoral system and the officials who run it are under considerable pressure. In a survey of EROs conducted in 2016, 47% of respondents reported receiving insufficient funding for their work compiling the electoral register. Roughly half of respondents said that they had thought about resigning over the last year.<sup>21</sup>

These findings are not surprising given the severe strain EROs are under, notably in the immediate weeks before an election. By way of example, nearly half a million citizens registered to vote in the 2015 General Election on the deadline for registration itself, creating enormous pressure on EROs and the wider voting infrastructure.<sup>22</sup>

### **The need for something new**

It is our view that AVR would go a significant way in tackling the disparities and inefficiencies of the current system. It would diminish the impact of the cyclical registration patterns which put so much pressure on the voting infrastructure and its officials. This would, in turn, allow local authorities to save the money they spend chasing citizens to register and focus their resources elsewhere. AVR would also go some way in bridging the current gaps in registration across various ethnic and socio-economic groups.

The argument for AVR is not new. In recent years, a number of groups have recommended that some form of AVR be introduced, including the Electoral Reform Society,<sup>23</sup> the Political and Constitution Reform Committee<sup>24</sup> and the APPG for Electoral Reform<sup>25</sup>. The Elections Bill represents an opportunity to make this change and bring our voting system into the 21st century.

## Blueprint for success

### AVR around the world

The UK is one of the few liberal democracies that does not already have some system of AVR in place.<sup>26</sup> Of 40 liberal democracies assessed by the Joseph Rowntree Reform Trust and the University of East Anglia, the UK is one of just six countries that does not have a system of either automatic or assisted voter registration.<sup>27</sup>

There are numerous types of AVR systems in force across the world, relying on various measures such as data matching, provisional enrolment and the maintenance of a central civil registry. Two instructive examples from Sweden and the Netherlands are explored in detail below. Similarities exist between the Swedish and Dutch models and the system currently in place in the UK, underlining the feasibility of introducing AVR in the UK.

### Case studies

#### *Sweden: Population register*

AVR in Sweden is the responsibility of the Swedish Tax Agency (the "**Tax Agency**"). This agency oversees the country's population register (the "**Register**"). Every citizen who is both eligible to vote and included on the Register will be automatically registered to vote 30 days before an election and sent a polling card.<sup>28</sup>

An individual is added to the Register following registration with the Tax Agency. This process is required for all individuals who are resident in Sweden for one year or longer.<sup>29</sup> The responsibility for registering with the Tax Agency lies with the individual. However, the use of the Register to facilitate AVR simplifies the process of electoral registration. It also provides a possible precedent for the implementation of AVR in the UK. As further explored below, attainments could, for example, be directly enrolled on issuance of their national insurance number ("**NINo**") by the Department for Work and Pensions ("**DWP**").

#### *The Netherlands: Online address change system*

In the Netherlands, AVR is also implemented via a national population database: the Personal Records Database (the "**Database**"). Compared to the Swedish model, however, municipal governments are responsible for collecting citizen data and entering it into the Database.<sup>30</sup> This is similar to the current

system in the UK in which responsibility for electoral registration rests with the EROs in local councils.

In the Netherlands, citizens are also required by law to inform their new municipality of a change of address within a fixed period (starting from four weeks prior to their move to five days after moving). The new municipality is then responsible for updating the individual's records on the Database and will inform the old municipality of the change in address.<sup>31</sup> This system is effective in ensuring that the register of eligible voters remains up-to-date.

### The success of AVR further afield

Studies conducted in jurisdictions that have recently introduced AVR systems (such as some states in Australia and the US) show a correlation with material increases in registration and participation rates, particularly among disadvantaged groups.

A study of the Direct Enrolment programme introduced in Victoria (Australia) in 2010, under which citizens are automatically added to the register 21 days after they turn 18, found that (i) the number of new direct enrolments reached 191,849 per year in 2015/16; and (ii) direct enrolment was very effective at encouraging first-time voters to vote, with 79.4% of 18-19-year old direct enrollers casting a ballot in the 2014 state elections.<sup>32</sup>

A 2019 report published by the Brennan Centre for Justice in the US considered 15 states that had implemented AVR. In these states individuals were automatically registered when interacting with government agencies, which provided voter registration information to election officials. The report found that AVR significantly increased the rate of new voters being registered per week from between 9% to 94% depending on the relevant US state.<sup>33</sup>

Similarly, a study published by Data For Progress analysing the impact of AVR laws passed in seventeen US states and the District of Columbia found that AVR dramatically increased participation rates among young people aged between 18-24 and low-income people who were 6.3% and 4% (respectively) more likely to turn out in AVR states.<sup>34</sup>

By contrast, the UK is witnessing a fall in the number of young people registering to vote, with the Electoral Commission reporting a drop of 21% in the number of attainments on parliamentary registers between 2019 and 2020.<sup>35</sup>

# Implementing AVR in the UK

## The way forward

We support the implementation of AVR for all eligible citizens. AVR refers to a process by which citizens can be added to the electoral register, or their address updated, without the need for pro-active action on their part.<sup>36</sup> This can be achieved by making use of existing data sources and interactions between individuals and public bodies.

### Direct enrolment from national data sources

Data sharing systems can be implemented between public bodies (such as the DWP, DVLA, HM Passport Office, HMRC, schools and universities) and EROs. EROs can then be placed under a specific obligation to use information received from those bodies to register citizens to vote.

Harnessing information from these data sources will enable EROs to register unregistered individuals without having to spend time and resources chasing them. Significantly, information held by public bodies can be updated as individuals enter new transactions with the body in question. This could, in turn, enable EROs to update the existing information they hold. To illustrate the significant impact this could have:

- (a) The DVLA maintains more than 49 million driver records<sup>37</sup> and processes approximately four million driving licence applications and three million driving licence changes per year.<sup>38</sup> Drivers are also required to update the DVLA when they move address which could enable EROs to identify recent movers, who make up a significant proportion unregistered individuals.<sup>39</sup>
- (b) The Passport Office receives around seven million UK passport applications annually. The information from those applications could be provided to EROs to enable them to register eligible individuals. Importantly, passport data includes information on a person's nationality, one of the current criteria for determining a person's eligibility to register.<sup>40</sup>
- (c) In 2020/2021 there were 2.66 million students in UK higher education institutions, with most students studying their first degrees. Using data from university registration could provide EROs with a dataset that is recent and concerns a currently under-registered proportion of the population specifically young people.

## Evidence of success

There is existing evidence of the success of data sharing between public bodies and EROs. In 2016, Sheffield City council devised a scheme whereby student enrolment forms for local universities included invitations to apply for electoral registration. Where students took up this option, their details were passed on to EROs. The take up rate for voter registration was 66% among eligible students.<sup>41</sup>

### Modernising existing measures

AVR can also facilitate and improve pre-existing approaches that EROs have used with success. The Electoral Commission reports that EROs and their staff have been known to attend British citizenship ceremonies to encourage new British citizens to register to vote.<sup>42</sup> The registration of such individuals could be achieved more efficiently through AVR, if EROs were able access information held by the by the Home Office when citizenship applications are granted.

### Direct enrolment for attainers

In addition to these data sharing measures, Patchwork supports the automatic registration of attainers when they are issued their NINo at the age of 16. We enclose in the Appendix to this briefing a proposed amendment that would achieve this. This amendment was drafted by Gordon Nardell QC of Twenty Essex Chambers with the support of Patchwork and Hogan Lovells. We are grateful to Baroness Hayman of Ullock for her support in tabling this amendment in the House of Lords on 14 March 2022 (amendment number 144B).<sup>43</sup>

Under the current voter registration system, an individual's application is processed using the Cabinet Office's IER Digital Service ("IERDS"). Applications are verified against DWP records held on the Customer Information System ("CIS") database. The outcome of the verification process is then passed on, via the IERDS, to the EROs who assess whether the relevant individual should be added to the electoral register.<sup>44</sup>

The direct enrolment of attainers would involve a more pro-active approach whereby information held by the DWP on the CIS database is shared directly with the EROs via the IERDS at the point at which an individual's NINo is issued. This would enable the EROs to register voters without their active involvement. In order to address any privacy and data

security concerns, individuals registered via this method could be omitted from the edited register unless they request otherwise.

Implementing this targeted form of AVR would have significant advantages:

- (a) according to a report produced by the University of East Anglia and the Joseph Rowntree Reform Trust, this form of AVR would add "700,000 citizens to the roll each year"<sup>45</sup>;
- (b) in addition to being recommended by (among others) the Electoral Commission<sup>46</sup> and the APPG on Democratic Participation<sup>47</sup>, this proposal enjoys wide public support. In a survey conducted by the Electoral Commission in February 2021, it was found to be the top ranked policy "most likely to increase satisfaction with the voter registration system"<sup>48</sup>; and
- (c) targeting attainers represents an administratively efficient way of increasing voter registration, saving money spent on voter outreach efforts and requiring little additional administrative effort (as citizens are already written to ahead of their 16<sup>th</sup> birthday with their NINo).<sup>49</sup>

### Our response to the Government's objections to AVR

The Government has opposed AVR on two grounds:<sup>50</sup>

- (a) that it contradicts the principle that each individual should be responsible for registering themselves; and
- (b) that it would be very difficult to implement.

We disagree.

#### *The principle of individual electoral registration*

As mentioned above, the system of individual electoral registration has resulted in a non-representative voter base. Evidence shows that younger people, people from working class households and people from minority ethnic groups are all less likely to be registered.<sup>51</sup> This leads to a register that is not just incomplete, but imbalanced and unrepresentative. We believe that AVR will remove material obstacles facing those who want to vote.

Further, under existing law, EROs can require eligible individuals to apply to be registered and impose civil penalties when they fail to do so.<sup>52</sup> The law therefore envisages that those who can be registered to vote,

should be registered vote. We believe that AVR will help achieve this aim.

#### *Feasibility of implementation*

The implementation of AVR in the UK has been shown to be technically and operationally feasible without fundamentally altering the structure of the electoral registration system, most notably by the Electoral Commission in its feasibility studies published in 2019:

*"[T]echnology already employed by the UK Government's Individual Electoral Registration Digital Service (IERDS) could form the building blocks for the majority of the reforms. This system already links all local authorities with a central service capable of verifying people against the Department for Work and Pensions' customer information system as part of the registration application process...The further development of the [IERDS] could pave the way for systems of automated or automatic registration to be implemented".<sup>53</sup>*

These feasibility studies relied on a range of sources including data already collected by government departments and agencies, stakeholder consultations, research on existing public sector data infrastructures and other countries' experiences of electoral registration reforms.<sup>54</sup>

The Electoral Commission advised that a number of achievable steps exist for paving the way for automatic (or automated) registration, such as (i) creating unique identifiers for each elector to enable the identification of duplicates across registers; and (ii) detailed testing of potential new data sources to determine the most effective options for identifying potential electors and managing electoral registers.

#### **Conclusion**

For these reasons, we at Patchwork and Hogan Lovells believe that the Elections Bill presents an opportunity to implement AVR in the UK, and that opportunity should not be missed. AVR would strengthen the robustness and representativeness of our democracy. In our view, that is an endpoint which is in everyone's interests.



## Appendix: Proposed new clause for the direct enrolment of attainers

### Data sharing for electoral registration on issue on national insurance number

- (1) The issuing authority must, on issuing to a person a national insurance number pursuant to regulation 9 of the Social Security (Crediting and Treatment of Contributions and National Insurance Numbers) Regulations 2001 (2001 SI No. 769), give each appropriate electoral registration officer the information required by subsection (2) (the “required information”).
- (2) The required information is—
  - (a) the person’s full name,
  - (b) the address which the issuing authority believes to be the person’s sole or main residential address (“main address”),
  - (c) any address which the issuing authority believes to be the address of any other place where the person resides (“secondary address”),
  - (d) where the issuing authority believes that the person has moved to the primary address within the period of one year preceding the issue of the national insurance number, any address which the issuing authority believes is the person’s previous sole or main residential address (“previous address”),
  - (e) information indicating that the person is aged 18 or older, or if under the age of 18, the person’s date of birth, and
  - (f) information that indicates whether the person is qualified to be registered as an elector.
- (3) Where an electoral registration officer receives information pursuant to subsection (1) the officer must—
  - (a) if it appears to the officer that the information contains all of the required information and that the person is entitled to be registered as an elector in the officer’s area, register that person on each appropriate electoral register;
  - (b) otherwise, contact the person with a view to obtaining information indicating whether the person is entitled to be registered as an elector in the officer’s area.
- (4) Where a person is registered under subsection 3(a), that person must be omitted from the edited register unless that person notifies the electoral registration officer to the contrary.
- (5) As soon as reasonably practicable after registering a person pursuant to information received under subsection (1), the electoral registration officer must notify the person of the registration.
- (6) Notification under subsection (5) must include an invitation to correct any inaccurate information.
- (7) Notification under subsection (5) must also include an invitation to inform the electoral registration officer if the person believes that the person is not entitled to be registered on that register; and if the person so informs the electoral registration officer, the officer must remove the person’s name from the register.
- (8) Subsection (7) does not prevent the person from being registered again if subsequently the electoral registration officer is satisfied that the person is entitled to be registered.
- (9) In this section—

“appropriate electoral registration officer” means the electoral registration officer responsible for maintaining an electoral register for the area in which a person’s main address, secondary address or previous address is situated;

“edited register” has the same meaning as in regulation 93 of the Representation of the People (England and Wales) Regulations 2001 (SI 2001 No. 341) (edited version of the register);

“electoral register” means the register of parliamentary electors and the register of local government electors for the relevant constituency or local government area;

“issuing authority” means the Secretary of State for Work and Pensions or such other person as is for the time being responsible for issuing a national insurance number.

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