

Title: Elections Bill Impact Assessment IA No: CO2023 RPC Reference No: RPC-CO-5056(1) Lead department or agency: Cabinet Office Other departments or agencies:	Impact Assessment (IA)
	Date: 18/01/2022
	Stage: Primary
	Source of intervention: Domestic
	Type of measure: Primary Legislation
	Contact for enquiries: cg-analysis@cabinetoffice.gov.uk
Summary: Intervention and options	RPC Opinion: N/A

Cost of Preferred (or more likely) option (in 2021 prices)			
Total Net Present Social Value	Business Net Present Value	Net cost to business per year	Business Impact Target Status
-£150m	£0	£0	£0

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

The Government is seeking to strengthen the integrity of our electoral system and ensure that our elections remain secure, fair, modern and transparent. The Government manifesto set out this commitment to protecting our democracy and ensuring that it remains fit for the modern age.

What are the policy objectives of the action or intervention and the intended effects?

The policy outcome is to deliver the Government's electoral integrity vision and its commitment to protect our democracy and ensure that it remains fit for the modern age. To ensure that those who are entitled to vote should always be able to exercise that right freely, effectively and in an informed way; and that fraud, intimidation and interference have no place in our democracy.

The UK's electoral system must continue to command the trust and confidence of the voter.

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

Delivery of the Government’s Manifesto and wider policy commitments on electoral integrity depend on primary legislation.

Option 1 (Preferred option) - Photo identification (voter identification), Absent Voting, Online Absent Vote Applications, Accessibility, Overseas Electors (removing 15 year limit), Campaigning Measures, Voting and Candidacy Rights of EU Citizens and First Past The Post. The photo identification model would provide the greatest level of security.

Option 2 - Mixed identification (voter identification), Absent Voting, Online Absent Vote Applications, Accessibility, Overseas Electors (removing 15 year limit), Campaigning Measures, Voting and Candidacy Rights of EU Citizens and First Past The Post. The mixed identification model would provide less security and would be more complicated to administer, but it is cheaper than the photo identification model.

Does implementation go beyond minimum EU requirements?		N/A		
Is this measure likely to impact on international trade and investment?		N/A		
Are any of these organisations in scope?	Micro	Small	Medium	Large
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)		Traded : No	Non-traded: No	
Will the policy be reviewed? It will be reviewed. If applicable, set review date: TBC				

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

Signed by the responsible :



Date: 20/01/2022

Summary: Analysis & Evidence

Policy Option 0

Description:

FULL ECONOMIC ASSESSMENT

Price Base Year 2021	PV Base Year 2021	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: N/K	High: N/K	Best Estimate: N/K

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	N/K	N/K	N/K
High	N/K	N/K	N/K
Best Estimate	N/K	N/K	N/K

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

There are no monetised costs of this policy.

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

- 1) **Failure to meet the Government's objective** of strengthening the integrity of the UK's electoral system and giving the public confidence that UK elections are modern, fair and secure.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	N/K	N/K	N/K
High	N/K	N/K	N/K
Best Estimate	N/K	N/K	N/K
Description and scale of key monetised benefits by 'main affected groups' Not applicable.			
Other key non-monetised benefits by 'main affected groups' Not applicable.			
Key assumptions/sensitivities/risks			Discount rate (%) N/A
Not applicable.			

BUSINESS ASSESSMENT (Option 0)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m:
Costs: N/K	Benefits: N/K	Net: N/K	
			N/K

Summary: Analysis & Evidence

Description:

FULL ECONOMIC ASSESSMENT

Price Base Year 2021	PV Base Year 2021	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: -80	High: -230	Best Estimate: -150

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	0	9.6	80
High	0	28.7	230
Best Estimate	0	19.2	150

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

- Poll card costs voter identification** - The cost of producing poll cards for voter identification estimated to be **£55m**.
- Voter Card costs (voter identification)** - The cost of producing the Voter Card is estimated to cost **£15m**.
- Electoral Registration & Electoral costs (Overseas Electors)** - This is estimated to cost **£15m**.

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

- A minority of electors may not complete the voting process** - evidence from the pilots suggests a small minority of electors may not complete the voting process or may not return to vote after turning up at the polling station without the correct identification. The communications campaign for the policy would seek to ensure all electors are aware of the requirements.
- Increased implementation, monitoring and enforcement costs for the UK government** - The implementation of the policies may lead to a small increase in these costs across some areas of the Bill.

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

Description and scale of key monetised benefits by ‘main affected groups’

1. There are no monetised benefits from this policy.

Other key non-monetised benefits by ‘main affected groups’

1. **Improving security and effectiveness of elections** - There were substantial increases in the belief there are sufficient safeguards to prevent fraud at polling stations in photo identification pilot areas and photo identification pilot models were the only ones to show an increase in those disagreeing that there is enough electoral fraud to affect election results. The photo identification model was seen by the Electoral Commission to have the greatest security strengths. The absent voting measures will strengthen the current postal and proxy voting arrangements and enhance the security of votes cast through these methods.
2. **Enabling participation amongst British citizens living overseas** - Removing the 15-year limit and improving the registration process, including making it easier for overseas electors to remain on the register with an absent vote arrangement in place, will increase participation amongst British citizens living overseas.
3. **An improved framework for electoral campaigning** will build on the principles of fairness and transparency to provide voters and campaigners with greater confidence in the campaigning process.
4. **Improved accessibility for disabled voters in poll stations** through requiring Returning Officers to provide each polling station with equipment as is reasonable to enable people with disabilities to vote

Key assumptions/sensitivities/risk

Discount rate (%)

3.5%

Maximum of 5 lines

1. **Take-up of photo identification** - There is some evidence which states the proportion of the electorate who do not have photo identification, and this is estimated to be between 1% and 4% - this is somewhat uncertain.
2. **Registration rates of overseas electors** - It is assumed the proportion of the overseas franchise who are registered to vote in election years remains at current levels - this is somewhat uncertain.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m:
Costs: 0	Benefits: 0	Net: 0	
			0

Summary: Analysis & Evidence

[Policy Option 2](#)

Description:

FULL ECONOMIC ASSESSMENT

Price Base Year 2021	PV Base Year 2021	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: -75	High: -210	Best Estimate: -140

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	0	9	75
High	0	27	210
Best Estimate	0	18	140

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

- Poll card costs (voter identification)** - The cost of producing poll cards for voter identification estimated to be **£55m**.
- Voter Card costs (voter identification)** - The cost of producing the Voter Card is estimated to cost **£6m**.
- Electoral Registration & Electoral costs (Overseas Electors)** - This is estimated to cost **£15m**.

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

- Mixed identification more complex to administer** - Evidence suggests that mixed identification is a more complex method of identification to administer relative to photo identification.
- Increased implementation, monitoring and enforcement costs for the UK government** - The implementation of the Bill may lead to an increase in these costs across some areas of the Bill.

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

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

1. There are no key monetised benefits of this option.

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

1. **Improving security and effectiveness of elections** - In mixed identification pilot models, there were substantial increases in the belief there are sufficient safeguards to prevent fraud at polling stations, and the security of the model benefits from the inclusion of photo identification. The absent voting measures will strengthen the current postal and proxy voting arrangements and enhance the security of votes cast through these methods.
2. **Enabling participation amongst British citizens living overseas** - Removing the 15-year limit and improving the registration process, including by making it easier for overseas electors to remain on the register with an absent vote arrangement in place, will increase participation amongst British citizens living overseas.
3. **An improved framework for electoral campaigning** will build on the principles of fairness and transparency to provide voters and campaigners with greater confidence in the campaigning process.
4. **Improved accessibility for disabled voters in poll stations** from requiring Returning Officers to provide each polling station with equipment as is reasonable to enable people with disabilities to vote.

Key assumptions/sensitivities/risk

Discount rate (%)

3.5%

1. **Take-up of mixed identification** - There is some evidence which states the proportion of the electorate who do not have photo or non-photo identification, and this is estimated to be between 0.1% and 2% - this is somewhat uncertain.
2. **Registration rates of overseas electors** - It is assumed the proportion of the overseas franchise who are registered to vote in election years remains at current levels - this is somewhat uncertain.

BUSINESS ASSESSMENT (Option 2)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m:
Costs: 0	Benefits: 0	Net: 0	

Evidence Base

A. Problem under consideration and rationale for intervention

1. The measures are intended to strengthen our democracy, and ensure that our elections remain secure, fair, modern and transparent.
2. For all eight areas (Voter Identification, Absent Voting, Online Absent Vote Applications, Accessibility, Overseas Electors, Campaigning Measures, Voting and Candidacy Rights of EU citizens and First Past The Post), Government is the only entity that has the power to change administrative arrangements (via legislation) for running electoral events and the regulatory framework which governs campaigning. Implementation is mostly dependent on Local Authorities (LAs), statutorily independent Electoral Registration Officers and Returning Officers, voters, political campaigners and the Electoral Commission (EC).
3. The table below summarises the problem under consideration and rationale for intervention for all eight policy areas.

Table 1 - Summary of problem under consideration and rationale for intervention for all eight policies

Policies	Sub-policies	Problem under consideration and rationale for intervention
Voter identification		The introduction of voter identification is a Government manifesto commitment, following the 2016 Pickles report on

	<p>electoral fraud¹, where 50 recommendations were made for tackling electoral fraud across polling station conduct, postal voting and proxy voting. This included requiring voters to provide a form of identification at polling stations before voting.</p> <p>In 2019, there were 585 allegations of electoral fraud (62% of which at local elections). 139 (24%) allegations were of voting fraud (personation in polling stations, by postal vote, and by proxy vote). One of these led to a conviction for personation at a polling station. Another accepted a police caution for personation at a polling station. The only other conviction was for false information on a nomination paper.²</p> <p>Despite the low number of allegations and rare cases of personation in polling stations being prosecuted, there is a concern that the absence of evidence does not mean this practice is not taking place. And even if it is not, there is a precautionary principle that comes into play in terms of the potential for it to happen. The absence of some form of verification at the polling station has been identified by a number of expert organisations as a substantial vulnerability.</p> <p>Lord Pickles in his 2016 report, ‘Securing the ballot’ concluding his review into electoral fraud, highlighted the potential for vulnerabilities in the security and integrity of the voting process in polling stations to undermine public confidence in our democratic process.</p> <p>He said that, <i>“the most significant issue in relation to polling stations is whether electors should be required to provide identification before being allowed to vote. Trust has been an enduring factor in British elections for many decades. But a number of commentators now point to the potential for significant abuse if people can commit personation at polling stations with little risk of detection. It is harder to take out a municipal library book than it is to vote in a polling station administered by the same council.”</i></p> <p>Given the undeniable potential for election fraud, introducing voter identification will ensure elections are even more secure and will increase public confidence in the electoral system. Alternatives such as the mixed identification model without requiring photo identification were evaluated during the pilots and deemed more difficult to administer without providing as much benefit in terms of increasing the security of elections.</p>
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¹ [Pickles report](#)

² <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/our-views-and-research/our-research/electoral-fraud-data/2019-electoral-fraud-data>.

Absent voting	Postal and Proxy voting	<p>The 2016 Pickles report on electoral fraud found several areas where postal and proxy voting could be improved³.</p> <p>For example, there were weaknesses in the current postal and proxy voting processes which could be exploited by some individuals, and implementing the recommended changes would increase the security and the integrity of elections. The Bill will include the following measures:</p> <ol style="list-style-type: none"> 1. Require electors to reapply for a postal vote every three years (currently voters can hold a postal ballot indefinitely) so that Electoral Registration Officers can review the eligibility and veracity of applications more regularly. 2. Ban political campaigners from handling postal voting documents issued to another person. (Family members and designated carers would be exempt from this restriction). 3. Impose a limit (specified in secondary legislation) on the number of electors on behalf of whom a person may hand in postal votes to a returning officer or at a polling station. 4. Provide that a person may act as a proxy for a maximum of four electors (of which no more than two can be for 'domestic' electors, i.e. an elector that is neither an overseas elector nor an elector registered by way of a service declaration) regardless of the relationship between the elector and their proxy. 5. Extend the secrecy provisions that apply to voting in polling stations to postal voting so that anyone witnessing how a postal vote had been filled in would be prohibited from disclosing certain information, including how the voter cast their vote. The secrecy provisions will also be extended to proxy voting. <p>The outlined approach fits within the existing systems and is a practical and proportionate response to the issues the policy aims to address.</p> <p>The measure in the Bill that enables the creation of an online absent vote application service will support persons wishing to vote by post or proxy by providing an alternative method of making an application. Applications made online will be easier for administrators to process.</p>
Online absent vote applications and identity verification for absent vote applications		<p>The current application process for absent votes (voting by post or proxy) is cumbersome for both electors and administrators, as it relies solely on a paper-based application process. Application forms can be downloaded from Gov.uk, amongst other sites, and requested from an applicant's local ERO. Once completed the applicant must return the paper form to their ERO. It is out of step with how electors can apply to register to</p>

³ [Pickles Report](#)

		<p>vote online, via the Cabinet Office’s Register to Vote website and have their identity verified via the Individual Electoral Registration Digital Service (IERDS). This therefore limits accessibility and results in unnecessary processing time and costs for electoral administrators.</p> <p>The measure in the Bill that enables the creation of an online absent vote application service will support persons wishing to vote by post or proxy by providing an additional alternative method of making an application compared to the current paper-based application. Applications made online will be easier for administrators to process. Applicants will continue to have the option to apply for an absent vote using a paper form as well.</p> <p>The measures will also require applicants to have their identity verified as part of the application process for absent votes, for both paper and online applications. This is in order to maintain the integrity of elections and mitigate any increased risks of fraudulent applications - which an online service would make earlier at scale. Individuals already need to verify their identity before they can register to vote and such a change would bring absent vote applications in line.</p> <p>Similar to the legislation for registration applications, the detail of the identity verification requirements for absent vote applications, including an appropriate exceptions process, will be set out in secondary legislation, following detailed discovery work, policy and digital development, and engagement with stakeholders to identify the best solution.</p>
Accessibility		<p>The Government launched a call for evidence in 2017 to improve the electoral process for people with disabilities. The main changes will include:</p> <ol style="list-style-type: none"> a. Providing a broader requirement for Returning Officers to provide support for people with a wider range of disabilities. b. Removing restrictions on who can act as a companion to assist disabled voters. This will ensure that those such as carers can assist disabled voters. <p>The changes are intended to improve the accessibility of elections by increasing the support available in the polling station to voters with disabilities.</p>
Overseas Electors		<p>The Government’s manifesto included a commitment to <i>‘make it easier for British expats to vote in Parliamentary elections, and get rid of the arbitrary 15-year limit on their voting rights.’</i></p> <p>The Government does not view simply living overseas as sufficient justification for removing the right to vote, however does recognise having no tangible connection to the UK, or having never experienced life in the UK, as constituting such a reason. Most British citizens overseas retain deep ties to the United Kingdom. Many still have family here, some will return</p>

		<p>here. Many will have a lifetime of hard work in the UK behind them, and some may have fought for our country. The current 15 year limit on expats' voting rights is arbitrary and anachronistic in an increasingly global and connected world. This Bill will enable greater participation in our democracy by delivering 'votes for life' and making it easier for expats to vote. The Bill will therefore provide that:</p> <ol style="list-style-type: none"> 1. Any overseas British citizen who was last registered to vote in the UK over 15 years ago may register as an overseas elector. 2. Any overseas British citizen who was previously resident in the UK but not registered to vote as a domestic elector may register as an overseas elector.⁴ <p>To increase the numbers of overseas electors that remain registered between elections, and to support the manifesto commitment to make it easier for expats to vote⁵, changes will also be made to the overseas elector declaration renewal process to:</p> <ol style="list-style-type: none"> a. Extend the registration period for overseas electors from 12 months to a maximum of three years (with certain provisos). b. Establish a 'renewal declaration' that overseas electors can complete to remain registered for a further three years after they have registered for the first time. c. Allow for a fixed-point renewal cycle so that all overseas electors' declarations will expire on the third 1st of November after they are granted. d. Streamline processes so that renewal declarations are combined with requirements for overseas electors to re-apply for an absent vote or refresh their signature. <p>Changes to who is entitled to register and vote will be made via primary legislation, while much of the detail of the changes, such as changes to the application process, the overseas declaration, identity verification, address verification and registration renewal will be in secondary legislation, and in the subsequent service design.</p>
Campaigning Measures	Digital Imprints	<p>Existing electoral law requires that political campaigners distributing printed election material must include an 'imprint' on their material, showing who is promoting the material and on whose behalf.</p> <p>However, this law does not extend to digital material, thus resulting in a lack of transparency over digital campaigning material. The proposal will make digital campaigning more transparent by requiring campaigners to provide a digital imprint.</p>

⁴ This could include, for example, people who were of voting age and eligible to apply to register when they lived in the UK but did not do so, or people who were not of voting age before they left the UK and could, therefore, not apply.

⁵ Helping to meet the 2019 Conservative manifesto which included a commitment to 'make it easier for British expats to vote in Parliamentary elections.'

		<p>Regulation has not kept pace with the exponential growth in digital campaigning and voters do not always know who is promoting the material and on whose behalf. The digital imprint regime will build on the print regime, increasing transparency and empowering voters to make informed decisions about material they are viewing online.</p> <p>Voters value transparency and these new digital imprints will inform voters about the source of digital campaigning material, making UK politics even more transparent.</p>
	<p>Notional Expenditure</p>	<p>There have been calls to clarify the rules relating to notional expenditure. This concerns benefits in kind, such as property, goods, services or facilities provided to a candidate free of charge or at a discount rate, that may be declared as an election expense in the candidate's return.</p> <p>Confusion has led to candidates and agents growing concerned that they are liable for spending they were unaware of or not involved in, but were seen to have benefitted from. It has also led to national parties becoming reluctant to hold events in constituencies, due to uncertainty about whether the event could push the local candidate over the spending limit.</p> <p>The clarification of the law will ensure that all campaigners have reassurance that they are working within the same legal framework, maintaining a level playing field for all.</p>
	<p>Political Finance</p>	<p><u>(i) Third-party campaigner registration</u></p> <p>Third parties must currently register with the Electoral Commission before they spend £20,000 in England, or £10,000 in any of Scotland, Wales or Northern Ireland. This creates a window of up to £50,000 where spending from abroad is not illegal.</p> <p>Modern online campaigning tools make spending under this amount easy, and therefore this Bill intends to introduce a lower £10,000 UK wide registration threshold to mitigate this risk.</p> <p><u>(ii) Restricting all third-party campaigning to UK-based entities and eligible overseas electors</u></p> <p>Third parties who currently spend below the registration threshold are not regulated and therefore can come from anywhere in the world.</p> <p>This presents a risk for exploitation by campaigners who would not be permitted to register with the EC. Therefore, all election spending will be restricted to only those groups eligible to register as third-party campaigners, even if the spending is below the registration thresholds. Expatriate groups (overseas unincorporated associations) formed of overseas electors will be allowed to campaign as a group underneath this threshold.</p> <p><u>(iii) Ban on registering as both a political party and third-party campaigner</u></p> <p>Campaigners are currently permitted to register as both a</p>

		<p>political party and a third-party campaigner, therefore receive separate spending limits for each registration.</p> <p>Introducing this ban will ensure that campaigners cannot unfairly expand their spending powers at elections, by registering as both.</p> <p><u>(iv) Restrictions on coordinated spending</u></p> <p>Current electoral law sets out a number of rules which prohibit political parties and third-party campaigners from unfairly expanding their spending limits.</p> <p>However, the rules do not cover scenarios where political parties and third-party campaigners actively work together in pursuance of a common plan. Therefore restrictions on such coordinated spending will be introduced to ensure campaigners cannot use this as a route to bypass their spending limit.</p> <p><u>(v) Asset declaration for the registration of new political parties</u></p> <p>A political party with large, pre-existing financial resources can currently register with the EC and there is no requirement for this information to be made public at registration.</p> <p>Introducing an asset declaration for new political parties as a part of the registration process will increase transparency and allow for public scrutiny of a party's finances much earlier.</p>
	Intimidation - new electoral sanction	<p>The Committee on Standards in Public Life (CSPL) review, <i>Intimidation in public life</i>, concluded that the intimidation and abuse faced by those who participate in elections and political debate is increasing in scale and intensity.⁶ Based on 88 written submissions and 34 meetings, the review argued that it would be “appropriate to have specific electoral sanctions that reflect the threat that intimidation of Parliamentary candidates and their supporters poses”. This policy - the new electoral sanction against intimidation - originates from the CSPL review.</p> <p>A new electoral sanction will be introduced to ban those convicted of intimidating a candidate, future candidate, campaigner or elected officeholder from standing for, being elected to and holding elective office for five years.⁷</p>
	Undue influence	<p>Undue influence is where an individual seeks to apply pressure to force an elector to not vote or vote in a way they would not have done if pressure had not been applied.</p> <p>The current legislation is outdated and lacks the clarity needed to both prevent and prosecute incidents of undue influence. As a result, the current legislation does not provide adequate protection for electors. This was one of the conclusions of Commissioner Mawrey's 2015 judgment in <i>Erlam & Ors vs.</i></p>

⁶ [CSPL: Intimidation In Public Life](#)

⁷ In Northern Ireland, individuals nominated or named on a list of substitutes to fill a vacancy will also be protected by the new electoral sanction.

		<p><i>Rahman & Anor.</i>⁸ 100% of respondents to the Government consultation <i>Protecting the debate</i> also agreed with the need to clarify the existing legislation of undue influence.</p> <p>The existing corrupt practice of undue influence will therefore be restated and clarified, to provide greater protections for electors.</p>
	Electoral Commission Accountability	<p>As the independent regulator for elections and referendums, it is crucial that the EC's work is fully accountable to Parliament. The existing parliamentary accountability mechanisms for the EC via the Speaker's Committee on the Electoral Commission (SCEC) are limited to a narrow focus on financial scrutiny and appointment of Commissioners.</p> <p>In addition, the expansion of the EC's powers towards developing the ability to bring criminal prosecutions would represent an ineffective use of taxpayers' funds.</p> <p>The proposals will therefore clarify the extent of the EC's enforcement powers in England, Wales and Northern Ireland, and improve the accountability of the EC to Parliament by introducing a Strategy and Policy Statement and by amending the functions of the SCEC.</p>
Voting and Candidacy Rights of EU Citizens		<p>At present, EU citizens resident in the United Kingdom may register for the local government franchise, and are consequently able to vote and stand in elections that use that franchise. The ability of EU citizens to vote and stand in local elections did not immediately change on our exit from the EU. This matter was not included in the EU Exit negotiations as voting rights are for sovereign states to determine. This was acknowledged by the EU in withdrawal negotiations, and was the reason that they were not included in the Withdrawal Agreement. Therefore citizens of EU Member States (EUMS) who are resident in the UK retain their voting and candidacy rights until such time as domestic legislation is amended.</p> <p>The UK Government's view is that the UK has left the European Union, and there should not be a continued right to register, vote and stand in local elections by virtue of being an EU Citizen. The Government therefore proposes that EU citizens who have been living in the UK prior to the end of the Implementation Period (31 December 2020) will maintain their local voting and candidacy rights in England and Northern Ireland, provided they retain lawful immigration status. This goes beyond our obligations in the Withdrawal Agreement. It also mirrors the stance taken on the EU Settlement Scheme. EU citizens, who have arrived since 1 January 2021, will move to a position whereby future local voting and candidacy rights are granted where there is an agreement with individual European Union Member States. This will therefore rest on the principle of a mutual grant of rights.</p> <p>The UK will continue to invite EU Member States which are interested in entering into such agreements the opportunity to negotiate treaties.</p>

⁸ <https://fieldcourt.co.uk/wp-content/uploads/Erlam-Ors-v-Rahman-Anor-2015-EWHC-1215-QB-23-April-2015.pdf>

		<p>These measures therefore ensure that British nationals living overseas in the EU benefit from the Government’s approach.</p> <p>Voting and candidacy rights for local elections⁹ in England and Northern Ireland are reserved to the UK Government. The Government is also responsible for the franchise in the Police and Crime Commissioner (PCC) elections in England and Wales. These are the elections which will be affected by this policy. EU citizens have never been able to vote in UK Parliamentary elections and as such, this policy does not impact on eligibility for those elections. Responsibility for devolved elections in Wales and Scotland, including elections to the Scottish Parliament and the Senedd Cymru, will not be affected.</p> <p>The voting and candidacy rights of Irish citizens are not affected by these measures, as these long-standing rights long pre-date EU membership.</p> <p>Citizens who have been continuously resident in the UK since before 31 December 2020, who are Citizens of Cyprus and Malta, which are simultaneously EU and Commonwealth states, will retain the right to vote and stand as candidates in local elections in line with their status as citizens of EU Member States and not Commonwealth states. That is because the candidacy rights of the former will be less restrictive than the latter. This upholds our commitment that the rights of those citizens who made their home in the UK before EU Exit will be respected. Citizens of these countries who have arrived since 1 January 2021 will continue to have the right to both vote and stand for election in local elections in line with their status as (qualifying) Commonwealth citizens; broadly speaking that is voting rights subject to ‘any leave to enter or remain’ immigration status, and candidacy rights subject to ‘indefinite leave to enter or remain’ immigration status. Cypriot and Maltese citizens will also continue to have the right to both vote and stand in UK Parliamentary elections as well, due to their status as Commonwealth citizens. The UK will remain open to voting and candidacy rights agreements with Cyprus and Malta, alongside other European Member States.</p>
First Past The Post		<p>Commitment to FPTP has been expressed in successive manifestos: in the 2015 Manifesto to respect the outcome of the 2011 Referendum to retain FPTP for Parliamentary elections, and in 2017 to extend the system to PCCs and mayors. The 2019 Manifesto committed to “<i>continue to support the FPTP system of voting, as it allows voters to kick out politicians who don’t deliver, both locally and nationally</i>”. In March 2021, the Home Secretary announced in her written ministerial statement, concluding Part One of the PCC Review, that the Government intends to change the voting system for all</p>

⁹ These measures also cover the following polls in which EU citizens have been eligible to vote as part of the local franchise: local authority governance referendums, local council tax referendums, neighbourhood plan referendums and parish polls.

		<p>combined authority Mayors, the Mayor of London and PCCs from the Supplementary Vote (SV) to FPTP, as soon as Parliamentary time allowed. In September 2021 the Minister for the Constitution announced this provision would extend to local authority mayors, ensuring that all Mayoral elections across England will have a consistent voting system.</p> <p>The SV system is a more difficult system for voters to understand and this is reflected in the level of ballots rejected because of inaccurate completion. The Electoral Commission Report of the 2015 General Election found that the percentage of votes rejected in the Mayoral elections, which uses the SV system, held on the same day as the General Election, was between 2.2% and 4.0% compared to 0.33% for the UK Parliamentary ballot papers¹⁰.</p> <p>The FPTP system is a simple, tried and tested voting system and is well understood by voters, providing a robust and clear way of electing representatives. Moving to FPTP for PCC and mayoral elections will make it easier for the public to express a clear preference, strengthen accountability and improve transparency. Voters vote for the candidate they want to win, they are not required to second-guess who will get through to the second preference round or risk losing their vote entirely as is with the SV system, and the person with the most votes wins.</p> <p>Directly elected PCCs and mayors must be locally accountable. The FPTP system will allow the public to vote out an office holder who is failing to deliver and reflects that transferable voting systems were rejected by the British people in the 2011 nationwide referendum. A move to FPTP for PCCs and elected mayors will provide for strong and clear local accountability and will bring more consistency to the various elections people will vote in.</p>
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B. Policy objective

4. The policy outcome is to deliver the Government’s electoral integrity vision and its commitment to protect our democracy and ensure that it remains fit for the modern age. To ensure that those who are entitled to vote should always be able to exercise that right freely, effectively and in an informed way; and that fraud, intimidation and interference have no place in our democracy. The UK’s electoral system must continue to command the trust and confidence of the voter.
5. The table below provides a summary of the policy objective for each of the policies, and the associated key performance indicators.

Table 2: Summary of policy objectives and key performance indicators

Policies	Sub-policies	Objective	Key performance indicators
Voter		Reduce electoral fraud	Integrity

¹⁰ [UKPGE report May 2015 \(electoralcommission.org.uk\)](http://UKPGE report May 2015 (electoralcommission.org.uk))

identification		<p>Increase public confidence and trust in the democratic process</p> <p>Ensure that no new opportunities for electoral fraud arise</p> <p>Ensure the policy is accessible to all eligible electors and can be delivered successfully</p>	<p>Increased elector trust and confidence in the voting process</p> <p>Accessibility Awareness of the requirements across groups</p> <p>Participation of eligible electors - those without eligible photo identification are able to apply for a Voter Card and those with eligible photo identification using it to cast their vote</p> <p>Delivery Increased polling station staff and electoral administrator confidence and ensuring the requirements are delivered successfully</p>
Absent voting	Postal and proxy voting	<p>Make postal/proxy voting more secure</p> <p>Ensure fraud is less likely to occur</p> <p>Enhance faith in the integrity of the electoral process</p> <p>Further modernising electoral processes</p>	<p>Electoral administrators are able to implement measures on time for electors to utilise effectively.</p> <p>Continued high levels of public confidence and trust in the integrity of the absent voting system.</p> <p>Awareness of new requirements amongst political parties, the public and campaigners.</p>
Online absent vote applications and identity verification for absent vote applications		<p>Make absent vote applications more accessible for electors</p> <p>Make absent vote applications more efficient for electoral administrators to process</p> <p>Ensure fraud is less likely to occur</p> <p>Further modernise electoral processes</p>	<p>Electoral administrators are able to process absent vote applications more efficiently than currently.</p> <p>Continued high levels of public confidence and trust in the integrity of the absent voting system.</p> <p>Awareness of new requirements amongst the public.</p> <p>Overseas electors have an absent vote arrangement in place prior to a UK Parliamentary General Election being called.</p>

Accessibility		<p>Make it easier for people with disabilities to engage and take part in the democratic process.</p>	<p>Disabled people have more confidence in being able to vote including through the awareness of increased support, as reflected in post-election surveys undertaken by the Electoral Commission and charities who represent their interests such as the RNIB who are members of the Government chaired Accessibility of Elections Working Group.</p> <p>The Working Group to analyse identified barriers to greater participation and implement actions where appropriate to address these.</p> <p>Constructive feedback from key stakeholders through the Government chaired Accessibility of Elections Working Group and undertake regular reviews of the policy through the working group.</p>
Overseas electors		<p>Give British citizens living overseas (who at any time have previously registered or have been previously resident in the UK) a right to vote in UK Parliamentary elections.</p> <p>Improve the electoral registration system for overseas electors, which, like the franchise change, will facilitate greater participation in the UK's democracy.</p>	<p>Newly enfranchised British citizens overseas who want to vote in UK Parliamentary elections are successfully registered ahead of the next scheduled General Election in May 2024 with an absent vote arrangement in place¹¹.</p> <p>Maintain levels of public trust and satisfaction with the running of elections.</p> <p>The ease with which administrators are able to manage a potentially large increase in volume of overseas electors.</p>
Campaigning measures	Digital imprints	To provide transparency for voters concerning digital	Campaigners complying with the new rules.

¹¹ Under the FTPA, the next election is scheduled for May 2024. Under the Dissolution and Calling of Parliament Bill, the next election would be due to take place in January 2025

	<p>campaigning material in scope of the regime.</p> <p>To help the EC and the police better identify and monitor who is promoting campaigning material and enforce spending rules for candidates, political parties, registered third parties and other campaigners.</p>	<p>Voters feel like they benefit from greater transparency over digital campaigning material.</p> <p>Digital imprints supporting the enforcement of campaign spending rules.</p>
Notional expenditure	<p>Clarifying the legislation on notional expenditure, thus making it easier for candidates, election agents, political parties and other campaigners to understand the rules.</p>	<p>Clear and consistent understanding of the amended framework by campaigners, candidates and political parties.</p>
Political finance	<p><u><i>i) Third-party campaigner registration</i></u></p> <p>Increase the transparency of third-party campaigning.</p> <p>Ensure more third-party campaigners are from the UK or otherwise eligible.</p> <p>Minimal regulation to avoid excessive burdens on low-spending third-party campaigners.</p> <p><u><i>ii) Restricting all third-party campaigning to UK-based entities and eligible overseas electors</i></u></p> <p>Ensure all third-party campaigning is undertaken by those individuals and groups with legitimate interest in UK elections.</p> <p><u><i>iii) Ban on registering both as a political party and a third-party campaigner</i></u></p> <p>Prohibit campaigners from attempting to bypass the existing spending limits by registering on two EC registers.</p> <p><u><i>iv) Restrictions on coordinated spending</i></u></p> <p>Ensure political parties and</p>	<p><u><i>i) Third-party campaigner registration</i></u></p> <p>Evidence of registrations on the lower tier will indicate whether third-party campaigners are appropriately registering.</p> <p>Public satisfaction with the increased level of transparency provided.</p> <p><u><i>ii) Restricting all third-party campaigning to UK-based entities and eligible overseas electors</i></u></p> <p>Success will be seen in all campaigning coming only from eligible sources and offences being applied to those who do not follow the rules.</p> <p><u><i>iii) Ban on registering both as a political party and third-party campaigner</i></u></p> <p>No groups registered on both the political party and third-party campaigner registers.</p> <p><u><i>iv) Restrictions on coordinated spending</i></u></p> <p>Evidence of parties and third-parties both correctly and accurately reporting</p>

	<p>third parties cannot unfairly expand their spending limits by working together.</p> <p><u>v) Asset declaration for the registration of new parties</u></p> <p>Increase transparency of a party's finances earlier, thus allowing public scrutiny.</p>	<p>their coordinated spending.</p> <p><u>v) Asset declaration for the registration of new parties</u></p> <p>The number of new parties with their assets and declarations published.</p> <p>Public satisfaction with the increased level of transparency.</p>
Intimidation - new electoral sanction	<p>Protect candidates, future candidates, campaigners and elected officeholders from intimidation.</p> <p>Deter individuals from carrying out acts of intimidation.</p> <p>Signal that intimidatory behaviour is a serious matter which must not be allowed to damage the UK's democracy.</p>	<p>Although the new electoral sanction will not be the sole determinant of the following indicators, it will contribute to:</p> <p>A reduction in intimidatory offences directed at candidates, future candidates, campaigners and elected officeholders.</p> <p>A reduction in the number of elected officeholders who report intimidation and abuse; in particular, a reduction in the number of elected officeholders who cite intimidation as a reason for stepping down from their position.</p> <p>In the long term, an increase in the number of individuals standing at elections and campaigning, particularly women and those from minority backgrounds.</p>
Undue influence	<p>Ensure the corrupt practice of undue influence properly reflects the range of activities that can be used to deter electors from voting, or cause them to change their vote.</p>	<p>Police and Returning Officers report increased confidence in applying the clarified legislation in operational situations. Prosecutors report increased confidence in prosecuting offenders.</p>
Electoral Commission accountability	<p>Avoid imposing any undue burden on taxpayers' funds by preventing any unnecessary expansion of the EC's enforcement activity.</p>	<p>The Crown Prosecution Service and the Public Prosecution Service remain the primary prosecution bodies for electoral law offences in England, Wales</p>

		<p>Increase the EC's accountability to Parliament by introducing a Strategy and Policy Statement and by amending the functions of the SCEC.</p> <p>Provide the EC with guidance to support the discharge of its functions.</p>	<p>and Northern Ireland;</p> <p>The EC does not require additional funds aimed at developing a prosecutorial capability;</p> <p>The SCEC examines the EC's compliance with its duty to have regard to the Strategy and Policy Statement;</p> <p>The EC is accountable to Parliament for regard given to the Strategy and Policy Statement.</p>
<p>Voting and Candidacy Rights of EU Citizens</p>		<p>Reflect the UK's new relationship with EU Member States, and our ongoing aim of securing treaties to provide voting and candidacy rights for UK citizens living in EU Member States, and those EU citizens living in the UK.</p>	<p>Retention of voting and candidacy rights for eligible EU citizens.</p> <p>Removal of EU citizens from the electoral register who have arrived in the UK since Implementation Period Completion Day (IPCD) and are not eligible as a result of a treaty between the UK and an EU Member State.</p> <p>Eligible EU citizens who want to vote are successfully registered following the implementation of future agreements.</p> <p>That an EU citizen elected before these measures come into force, and who otherwise remains eligible, is able to serve their full term.</p> <p>Awareness of new requirements amongst political parties, eligible EU voters and campaigners.</p> <p>The ease with which administrators are able to access information about franchise changes and revise the register post implementation and as new voting and candidacy rights agreements are reached and eligible EU citizens register</p>

			to vote.
First Past The Post		<p>Improve clarity of voting process for the electorate.</p> <p>Strengthen accountability for directly elected PCCs and elected mayors</p>	Reduced proportion of rejected ballot papers.

C. Rationale and evidence to justify the level of analysis used in the IA (proportionality approach)

6. The approach taken in this IA is considered proportionate to the proposed changes outlined in the Elections Bill, as it quantifies the economic impact of the various components of the Bill where possible.
7. Where evidence is not available, qualitative analysis has been produced to better understand the potential impacts of the Bill. Some areas of the analysis, such as the proportion of the electorate who do not have photo or mixed identification, or the estimated take-up of overseas electors is uncertain, and therefore sensitivity analysis has been conducted in section H to test these assumptions.

D. Description of Options considered

8. The Options considered for this Impact Assessment are:
 - **Option 0:** Do not legislate (do nothing). The current arrangements for the electoral process will continue, with no provision for voter identification, and no changes to the overseas electorate, absent voting, online absent vote applications (OAVA), accessibility, Campaigning Measures, Voting and Candidacy Rights of EU Citizens and First Past The Post. However, this will not meet the Government’s objective to tackle the vulnerabilities in the UK’s trust-based electoral system.
 - **Option 1:** This option proposes that photo identification will be required for Local and General Elections¹². Changes will also be made to absent voting and an online absent vote service will be introduced, and accessibility. This option will also remove the 15-year limit for overseas voters and make it easier for them to vote, and a suite of eight measures to improve the integrity of the campaigning process will also be introduced. Further changes will also be made to the voting and candidacy rights for EU citizens. Changes will also be made to PCC and Mayoral elections to move from SV to FPTP. This is the **Government’s preferred option**.
 - **Option 2:** This option proposes that a mixed identification model will be required for Local and General Elections. This will require electors to bring either one form of photo identification or two forms of non-photo identification. The proposals for accessibility, absent voting, online absent vote applications, overseas electors,

¹² Voter Cards will only be required for local elections in England.

Campaigning Measures, Voting and Candidacy Rights of EU Citizens and FPTP are otherwise the same as Option 1.

9. Options 1 and 2 would deliver the UK government’s objective to strengthen the UK’s democracy, and ensure that our elections remain secure, fair, modern and transparent. However, photo identification (in Option 1) would provide the greatest level of security, whilst the mixed identification approach (Option 2) would be less secure and more complicated to administer, albeit cheaper to implement. Therefore Option 1 is the **Government’s preferred option**.
10. The rationale for choosing the options outlined above is that the majority of the Bill, such as absent voting, online absent vote applications, accessibility, overseas electors, Campaigning Measures, Voting and Candidacy Rights of EU Citizens and FPTP, are binary in terms of how the problem is addressed (i.e. the policy is either implemented or it is not). This means that further options have not been considered for these components of the Bill.

E. Summary and preferred option with description of implementation plan

11. These measures will require both primary legislation and secondary legislation. Supporting secondary legislation will be brought forward based on priority and complexity of the policy measures, following Royal Assent.
12. Table 3 sets this out for each of the policies.

Table 3: Summary and preferred option with description of implementation plan

Policies	Sub-policies	Preferred option and implementation plan
Voter identification		<p><u>Preferred Option:</u> Electors will be required to show photo identification at general elections and local elections in England from 2023 onwards.</p> <p><u>Implementation plan:</u> Amendments to the Representation of the People Act (RPA) (1983) to include a clause which requires an approved form of photo identification. Those without an approved photo identification can apply for a free, local Voter Card from their LA. Expired photo identification will be accepted as long as the photo is of a good enough likeness to allow polling station staff to confirm the identity of the holder.</p>
Absent voting	Postal and proxy voting	<p><u>Preferred Option:</u> Three-year limit on postal vote applications is introduced in 2022/23.</p> <p><u>Implementation plan:</u> Phased approach for current long-term postal voters. These persons will be able to continue to vote by post until either the third yearly renewal date following the commencement of the policy, or their existing personal identifier renewal date if this is sooner.</p> <p><u>Preferred Option:</u> Person will only be able to act as a proxy for a maximum of four electors (of which no more than two can be for ‘domestic’ electors) at any given time.</p> <p><u>Implementation plan:</u> Current proxy rules will continue until a</p>

		specified date in future, which will be specified in secondary legislation and will likely be a date after the next set of scheduled May elections, following RA. On that date, proxy voters will cease to have a proxy vote and will need to reapply under new rules (they will be sent a reminder in advance of that date and can apply before then so the move to the new proxy vote arrangement is as seamless as possible).
Online Absent Vote Applications		<p><u>Preferred option:</u> Electors will be able to apply for an absent vote online, through a gov.uk service. Electors will be asked to verify their identity as part of their application, both for online and paper applications. Applicants applying online will be able to have their identity verified in real time.</p> <p><u>Implementation plan:</u> The Elections Bill will amend existing legislation covering absent vote applications and further changes will also be made in secondary legislation. Cabinet Office will build and provide the online absent vote application service. The changes will be implemented ahead of the next scheduled UK Parliamentary General Election in 2024.</p>
Accessibility		<p><u>Preferred Option:</u> Returning Officers will be responsible for new arrangements, with support of EC guidance, including providing recommended assistive equipment in line with guidance.</p> <p><u>Implementation plan:</u> No transitional arrangements. Measures will be applied at polls scheduled for May 2023.</p>
Overseas electors		<p><u>Preferred Option:</u> Extend the franchise to all British citizens overseas who have been previously registered or resident in the UK and introduce changes to update and improve the registration and registration renewal processes.</p> <p><u>Implementation plan:</u> The intention is for these changes to come into effect in summer 2023, ahead of the next scheduled General Election in May 2024¹³.</p>
Campaigning measures	Digital imprints	<p><u>Preferred Option:</u> An imprint will be required on electronic material in scope of the regime outlining who has promoted the material and on whose behalf.</p> <p><u>Implementation plan:</u> We anticipate this will come into effect at least 6 months after Royal Assent to give time for the EC to produce the statutory guidance.</p>
	Notional expenditure	<p><u>Preferred Option:</u> Amending rules on notional expenditure to provide that a benefit in kind can only be made use of on behalf of a candidate or agent (or other entity such as a political party or third-party campaigner) where they have authorised it.</p> <p><u>Implementation plan:</u> We anticipate this will come into effect by regulation after Royal Assent.</p>
	Political finance	<p><u>i) Third-party campaigner registration</u></p> <p><u>Preferred Option:</u> Create a new lower tier of registration for third-</p>

¹³ Under the FTPA, the next election is scheduled for May 2024. Under the Dissolution and Calling of Parliament Bill, the next election would be due to take place in January 2025

		<p>party campaigners spending more than £10,000 but less than the existing thresholds for each part of the UK.</p> <p><u>ii) Restricting all third-party campaigning to UK-based entities and eligible overseas electors</u></p> <p><u>Preferred Option:</u> Only spending by UK-based entities and <u>registered overseas electors</u> will be allowed .</p> <p><u>iii) Ban on registering as both a political party and third-party campaigner</u></p> <p><u>Preferred Option:</u> Political parties will be removed from the list of entities that are able to register as a third-party campaigner and registered third-party campaigners will be prohibited from registering as a political party.</p> <p><u>iv) Restrictions on coordinated spending</u></p> <p><u>Preferred Option:</u> Political parties and third-party campaigners working together must both report any coordinated spending/joint campaigning.</p> <p><u>v) Asset declaration for registration of new political parties</u></p> <p><u>Preferred Option:</u> Political parties will be required to submit a declaration of their assets and liabilities upon registration, if they have assets or liabilities over £500.</p> <p><u>Implementation plan (all):</u> We anticipate these measures will come into effect by regulation after Royal Assent. Transitional requirements may be required. This will allow the EC time to produce guidance on the changes and for parties and campaigners to develop appropriate systems to comply with the rules.</p>
	Intimidation - new electoral sanction	<p><u>Preferred Option:</u> A new electoral sanction will be introduced to ban those convicted of intimidating a candidate, future candidate, campaigner or elected officeholder from standing for, being elected to and holding elective office for five years.</p> <p><u>Implementation plan:</u> This will come into effect as soon as possible after Royal Assent.</p>
	Undue influence	<p><u>Preferred Option:</u> Legislation will be clearer thus allowing stakeholders to understand what is and what is not considered undue influence. This will enable better enforcement of the legislation.</p> <p><u>Implementation plan:</u> This will come into effect as soon as possible after Royal Assent has been granted.</p>
	Electoral Commission accountability	<p><u>Preferred Option:</u> We will make provision for the introduction of a Strategy and Policy Statement that the Electoral Commission (EC) will need to give regard to in the discharge of its functions; we will expressly prevent the EC from bringing criminal prosecutions in England, Wales and Northern Ireland; and we will give the Speaker's Committee on the Electoral Commission (SCEC) the power to examine the EC's compliance with its duty to have regard to the Strategy and Policy Statement.</p> <p><u>Implementation plan:</u> These proposals will come into effect as soon</p>

		as possible after Royal Assent, with no transitional arrangements expected.
Voting candidacy rights of EU Citizens		<p><i>Preferred Option:</i> To amend the voting and candidacy rights of EU citizens in local elections in England and Northern Ireland, elections to the Northern Ireland Assembly and Police and Crime Commissioner in England and Wales (other local elections in the UK are devolved). Once these measures are introduced, in addition to satisfying the usual eligibility requirements which apply to all electors (e.g. age, residence, etc.) EU citizens must be part of one of two groups to participate in the above elections. They must either 1) be a citizen of an EU Member State with which the UK has a voting rights agreement (currently Spain, Portugal, Luxembourg, Poland), or 2) have been continuously resident in the UK or Crown Dependencies since before the Implementation Period Completion Date - 31 December 2020. Citizens of Cyprus and Malta, which are both EU and Commonwealth states, will retain the right to vote and stand as candidates in all elections for which the UK Government is responsible. The voting and candidacy rights of Irish citizens are also not affected by these measures, as these long-standing rights pre-date EU membership. An EU citizen elected before these measures come into force, and who otherwise remains eligible, will be able to serve their full term.</p> <p><i>Implementation plan:</i> Through primary legislation the changes within the Bill will retain voting and candidacy rights for those EU Citizens resident prior to IPCD and remove these rights from EU citizens who arrived after that point. It will instead provide a mechanism for these to be afforded solely in relation to citizens of individual EUMSs where a voting and candidacy rights agreement exists between that Member State and the UK.</p>
First Past The Post		<p><i>Preferred Option:</i> The FPTP voting system to replace SV at PCC, London Mayor, combined authority, and local authority mayoral elections provisionally from the May 2024 ordinary elections onwards. Commencement of the First Past the Post voting system for these elections will be via secondary legislation.</p> <p><i>Implementation plan:</i> Transition to FPTP will be implemented by the respective returning officers in their preparations for PCC and mayoral elections. This will be supported by revision to existing guidance published by the Electoral Commission. Implementation locally will include explanation to voters of the new FPTP system under which their votes will be counted through a single round count.</p>

F. Appraisal

13. The analysis set out below appraises each policy in turn and where relevant, the interaction between each of the policies. A new burdens assessment will be undertaken in respect of these policies.
14. As with any form of economic modelling, there is a certain degree of uncertainty as the final scope of the policy is yet to be determined (and will be done at secondary legislation stage). Some cost components have yet to be quantified, such as digital costs, and others are based on current best assumptions, such as details on Voter Cards. Therefore, costs can still potentially change. To account for this, a range of +/- 50% of the central scenario has been applied to create a high and low scenario for the quantifiable components of the Bill. These ranges have been used throughout this IA.
15. If estimates in this analysis are less than £1 million, it is rounded to the nearest £0.1 million. If it is less than £10 million, it is rounded to the nearest £1 million. If it is between £10 and £100 million, it is rounded to the nearest £5 million. If it is between £100 million and £1 billion, it is rounded to the nearest £10 million. If it is above £1 billion, it is rounded to the nearest £100m.

Option 1 - Photo identification model, Absent Voting, Online Absent Vote Applications, Overseas Electors, Campaigning Measures, Voting and Candidacy Rights of EU Citizens and First Past The Post.

F.1 Voter identification

F.1.1 Methodology

16. This analysis uses local electoral registration data from the Office for National Statistics (ONS) for 2020 for England, Wales and Scotland, to estimate the total number of registered electors in Great Britain. The ONS estimate this is 48.2m¹⁴. It then applies ONS population projections to estimate the yearly change in the electorate over the forecast period¹⁵. The relevant cost components are then applied to these forecasts to estimate the total impact¹⁶.
17. Costs have also been scaled according to the percentage of the electorate voting each year, given that not all constituencies hold elections each year and costs will depend on the number of constituencies that hold elections. This has been calculated by using the GOV.UK election timetable¹⁷ to find out which LAs are holding elections each year. The

¹⁴ Table 1, [ONS](#)

¹⁵ [ONS](#)

¹⁶ The ONS data is in calendar year whilst this analysis is in financial year. We have therefore assumed that the ONS projections would be the same for the financial year.

¹⁷ [Election Timetable](#)

electorate for each LA is found using ONS data¹⁸, summed for all those holding elections in a given year, and dividing by the total English electorate.

18. The analysis does not assess the impact of the policy on voter turnout. Year-on-year turnout comparisons are difficult due to the volatility of the electoral cycle. For example, local election turnout can vary significantly depending on whether elections take place at the same time as a general election, with turnout in Unitary Council local elections as high as 62.5% in 2015, decreasing to 33.3% in 2016¹⁹. The Electoral Commission's evaluation of the 2019 voter identification pilots concluded that: "*As in our evaluation of the 2018 pilots, it is not possible to draw a clear connection between the pilot scheme and any changes in turnout. Limited data is available and where it is available, the pattern is not consistent. We also know that turnout is volatile and dependent on a number of factors.*" Instead the analysis examines data for voters who turned up at polling stations in pilot areas with and without the required identification and the proportion of voters who returned to the polling station with correct identification. It also considers survey data for self-reported measures of the impact of the measures on likelihood to vote.

F.1.2 Monetised impacts

F.1.2.1 Direct costs

19. In March 2017, a prospectus was published for "Electoral Integrity Pilots", seeking expressions of interest from LAs who wished to run pilot schemes in May 2018. There followed an application process which identified five volunteer LAs to run voter identification pilots. Orders were prepared in respect of each pilot scheme, making amendments to existing rules governing the conduct of local government elections, so as to provide that a ballot paper must not be delivered to a voter unless that voter has produced a specified identification document to a presiding officer or a clerk. In some areas photo identification was required; in other areas, other forms of identification were sufficient, including mixed identification requirements (photo identification and non photo identification and the poll card).

20. Building on this, in 2019 10 LAs piloted three models of voter identification (with one model variation) - photo identification, mixed identification, conventional poll cards and poll cards with a scannable barcode. The models piloted were based on the interpretation of the policy requirement by the volunteer authorities and the requirement that voter identification, as suggested by Lord Pickles, should be applied proportionally. The pilots provided a number of data strands through which the impact of voter identification could be measured: a pre and post-election day public opinion survey; a polling station staff survey; data collected at polling stations; cost data collected by LAs; and qualitative interviews with electoral service teams in the participating LAs. The Cabinet Office and the Electoral Commission both produced two independent published evaluations of both rounds of pilots.

¹⁸ Table 1. [ONS](#)

¹⁹ Data collated in House of Commons Library briefing paper, Turnout at elections, Number CBP 8060, 25 November 2020

Equipment costs

21. To ensure people who do not have an approved form of photo identification can still vote, they will be able to apply for a free, local Voter Card from their LA, that includes a photo. LAs will be responsible for producing these cards, and therefore may require additional equipment. Equipment costs are assumed to be one off costs as once the equipment is purchased, it can be used in subsequent years.
22. There is a requirement for LAs to have webcams, so that those who choose to apply for a Voter Card in person can have their photo taken at council offices. The analysis uses cost data from the Electoral Office of Northern Ireland for the cost of a webcam, estimated at £83.05. It is assumed that one webcam per LA is needed, as data from Woking suggests that most people (c.80%) will apply for a Voter Card online rather than in person. As the model is calculated on a constituency basis, this equates to approximately 1 webcam per 2 constituencies (given there are c.330 LAs, but 632 constituencies).
23. LAs also require identification printers to produce the Voter Cards for those who need them. In the 2018 pilots, only Woking bought a printer at a cost of £1,423.27. In 2019, Pendle bought two identification printers at a cost of £950.78 each. Based on this, and research into the market value of an identification printer, a rounded assumption of £900 (£934.29 including inflation) per printer is carried forward.
24. The number of printers needed per LA depends on its size. It is assumed that one printer is required for an LA with an electorate of less than 100k, two printers for LAs with an electorate between 100k-200k, and three printers for an LA with an electorate of over 200k. This is an average of 1.64 per LA, which has been rounded up to 2 to be conservative. As the model is calculated on a constituency basis, this equates to 1.04 printers per constituency.
25. To advertise and communicate the requirement to bring voter identification to poll stations, it is assumed that each polling station will have two A3 posters containing all the information electors need, promoting accessibility. The cost of printing an A3 poster is calculated by taking an average from an internal Cabinet Office Cost Survey, of which 42 LAs responded to this question, giving an average cost of £0.18 per poster.
26. Each polling station will have one privacy screen and one mirror so that an elector has the option to have their identification checked in private, and use a mirror to adjust any religious headwear, or any other face covering, if it has to be removed as a result of the identification checking process. Each privacy screen and mirror costs £31.14 and £1.04 respectively²⁰, according to data from pilots and desk based research.

²⁰ Woking data shows a one off cost of £1.04 for a mirror. The 2018 pilots indicate a one-time cost of £52.06 per privacy screen, taken from Woking's cost form. The 2019 pilots indicate a one-time cost of £10.38 per privacy screen, taken from Derby's cost form. Desk based research confirms that privacy screens can be purchased for c.£31.14. Therefore a mid range estimate of £31.14 was taken forwards as the cost of a privacy screen.

27. Equipment costs will cost between £1 million and £3 million, with a central estimate of £2 million (2021/22 prices, 10 year PV)²¹.

Poll card costs

28. Under the new proposals, poll cards would be re-designed to include reminders of the requirement for voter identification in polling stations and what types of identification will be accepted. The poll card will be increased from A5 to A4 to account for the additional information, and will now be posted in envelopes. This creates additional costs as the poll cards will be bigger, and will require envelopes that were not needed previously. The majority of electors cited official local sources of information as the main channel for how they became aware of the identification requirements in the post wave Cabinet Office evaluation of the 2019 pilots, with 58% in the photo identification pilots citing poll cards as a main source of information, suggesting they are an effective form of communication²².

29. It is estimated that these changes will cost an additional £0.27 per poll card using data taken from an internal Cabinet Office survey and the average cost of an envelope according to the Royal Mail. The number of poll cards required varies annually, depending on the elections that are taking place in a given year. During a General Election year 100% of the electorate will be issued a poll card, but this will be lower in years with local elections as not all local councils have elections each year.

30. Total costs, found by multiplying the amount of poll cards needed with the **additional cost of the updated poll card, are between £25 million and £80 million (2021/22 prices, 10 year PV) with a central estimate of £55 million²³.**

Staff costs - excluding staff costs associated with Voter Card

31. The introduction of mandatory photo identification in polling stations requires extra staffing resource. During the pilots, some LAs raised the need, through qualitative semi-structured interviews, for additional poll clerks to help administer the additional identification checks on polling day, whilst other LAs did not think extra help was necessary. The number of additional poll clerks hired varied between LAs. Therefore, to allow for some LAs to hire extra poll clerks where they feel necessary, but to not create unnecessary costs for those who do not feel additional help is needed, an assumption of 1 additional poll clerk per 2 polling stations was made. This is an additional 19,851 poll clerks²⁴.

32. The wage of a poll clerk was taken from the 2015 election funding data, released by the EC. However, this data is based on settled claims, rather than total claims, so occasionally the wage of poll clerks is reported as below the minimum wage. Therefore, the assumed wage of poll clerks is instead taken as the minimum wage for over 25s in 19/20, updated

²¹ See rounding rules at the start of section F.

²² [Cabinet Office 2019 Voter Identification Evaluation](#)

²³ See rounding rules at the start of section F.

²⁴ [The Costs of the 2015 General Election](#)

to 2021/22 prices, at £8.52²⁵. Poll clerks work from 6:30am - 10:30pm, which is 16 hours per day. Therefore the total wage paid to poll clerks is £136.36 per poll clerk, per day.

33. Similarly, additional administration hours are needed to handle any additional queries relating to the identification requirements. Given there will be a national awareness raising campaign led by the EC for national rollout, it is anticipated that the number of contacts from electors to their LA will be reduced because of the availability of information and guidance from the EC. 2018 pilot data provided estimates of how much additional admin hours were needed to deliver the voter identification requirements in each LA. These were resource estimates and ranged across LAs: Woking budgeted for one FTE for four months (600 hours in total averaging 13.95 hours per polling station). However, Woking included the resource of printing Voter Cards within this estimate, so it is thought that this figure is an overestimate. The remaining 2018 pilots estimated 0.0, 0.2, 1.6 and 5.0 hours per polling station. Therefore, an average from the 2018 pilot data of 1.7 hours per polling station has been carried forwards.
34. The assumed cost of electoral admin staff per hour is based on an internal Cabinet Office survey, which found that the average hourly wage of LA staff is £18.06. The costs of the additional administrative burden are found by multiplying the number of polling stations, the additional administrative hours assumed per polling station, and the average wage of electoral admin staff.
- 35. Total additional staff costs are between £10 million and £30 million, with a central estimate of £20 million (2021/22 prices, 10 year PV)²⁶.**

Training costs

36. Poll station staff (poll clerks and presiding officers) will require extra training on how to complete the process for voter identification effectively and sensitively. It is assumed that any additional training on queries relating to the voter identification requirements will be included within existing training of electoral administration staff.
37. Data from the 2019 pilots indicated that training lasted between 1.5 - 2 hours, with at least one hour focussed on the voter identification requirements. Based on this, an assumption of one additional hour of training was carried forward.
38. An assumption of £15.57 per hour for the cost of training was carried forwards, based on cost data collected from the Woking pilot in 2018. The cost of training poll station staff is paid as a flat fee, but the rate varies across LAs and it is not typically calculated on an hourly basis.
39. There were a total of 105,592 poll clerks and presiding officers across Great Britain in the 2015 general election, taken together with the cost of training and the additional training needed per person gives the total additional cost of training²⁷. Therefore, **the additional**

²⁵ It is assumed that there are no non-wage labour costs.

²⁶ See rounding rules at the start of section F.

²⁷ [GOV.UK](https://www.gov.uk): Costs of the 2015 Parliamentary General Election.

cost of training is between £4 million and £10 million, with a central estimate of £7 million (2021/22 prices, 10 year PV)²⁸.

Voter Card costs

40. It is assumed that only a small percentage of the electorate will require a Voter Card, that Voter Cards will be valid for 10 years and expired photo identification, including Voter Cards, will be accepted as long as the photo is of a good enough likeness to allow polling station staff to confirm the identity of the holder.
41. Cabinet Office commissioned a nationally representative telephone survey in 2021 of residents eligible to vote in Great Britain, with a sample size of 8,500 people²⁹. This included 1,000 “boost” interviews with ethnic minority respondents, to ensure that the sample size for ethnic minority groups was sufficiently large for analysis. This survey provides data on the overall percentage of the population of Great Britain who are eligible to vote in general or local elections that do not hold the forms of photo identification currently under consideration for this policy (expired or in-date), and explores the difference in identification ownership between different groups (including protected characteristics). This will further inform planning for the successful implementation of voter identification nationwide, and ensure that voter identification works for all voters.
42. The demand for Voter Cards is likely to vary, with higher demand in General Election years than local election years where turnout is lower (c.70% and c.35% respectively)³⁰. Demand for Voter Cards is also likely to be higher in the first year of the policy than in subsequent years; it is assumed that many of those who require the Voter Card will already have applied for and own a Voter Card, given that they are valid for 10 years. The research found that the proportion of eligible voters without any photo identification is 2%, therefore this is used as the central scenario for General Election years and the first year of rollout. 1% is used as a central scenario for Local Election years, based on the percentage found in pilots during local elections, rounded up to the nearest percent.
43. Of course, there is some uncertainty associated with these estimates which means that an upper and lower bound have been considered.
44. Under the ‘high’ scenario, in General Election years and the first year of rollout 4% is used as this represents the percentage of the electorate without recognisable photo identification, as found in the Cabinet Office Photographic Identification Ownership Survey. For Local Election years, 2% is used as this represents the central scenario used in General Elections.
45. Under the ‘low’ scenario, in General Election years and the first year of rollout, 1% is used as this is the percentage found in local election pilots, rounded up to the nearest percent³¹.

²⁸ See rounding rules at the start of section F.

²⁹ [Cabinet Office Photographic Identification Ownership Survey, 2021](#).

³⁰ [Electoral Commission: Local election turnout data, House of Commons Library: General Election 2019 Turnout](#)

³¹ Woking 2018 = 64 (0.09% of electorate); Woking 2019 = 30 (0.04% of electorate); Pendle 2019 = 70 (0.1% of electorate); [2018 Voter Identification evaluation](#); [2019 Voter Identification evaluation](#).

For local election years, 0.1% is used as this is the percentage of the electorate requiring a Voter Card as found in the local election pilots.

46. It is important to note that these estimates are averages, and they may be higher in certain groups. Sensitivity analysis has been conducted in section H to test these assumptions.
47. Each Voter Card has an associated administration cost, related to the time taken to produce and deliver the document. It is assumed that half of applications for a Voter Card will be done remotely, and half will be in person at council offices. Northern Ireland estimates that 5 minutes is the time taken to produce and deliver cards, however this assumption was provided after the policy had been in place for a number of years and is therefore thought to be an underestimate. Northern Ireland provided an estimate of 5 minutes, however this has been tripled to provide a conservative estimate as the policy will take time to be implemented³².
48. Each Voter Card also has an associated production cost, given that a physical plastic card will have to be produced. In both 2018 and 2019, the Woking produced a physical photo identification card at a cost of £0.44 so this assumption has been carried forwards (the only other pilot site to produce a photo identification were Pendle in 2019).
49. The majority of Voter Cards are likely to be posted to electors, adding a postage cost, but some are likely to be collected from council offices. Woking provided an estimate of the amount of Voter Cards posted versus collected from the council office for both 2018 and 2019. A total of 93 Voter Cards were created, 73 (78%) were posted and 20 (22%) were collected from the council office. Therefore, it is assumed that 80% of Voter Cards will be posted and 20% will be collected from the council offices.
50. The cost of postage is £0.37, sourced from an internal Cabinet Office Cost Survey, containing responses from 81 LAs, and this is similar to an estimate provided by Woking of £0.33. Therefore, an assumption of £0.37 postage costs per Voter Card is carried forwards.
51. Anonymous electors who do not wish for their name to be on the electoral register, but who require a Voter Card, can apply for a free, anonymous electors Voter Card that can be used as identification at the polling station. Based on 2018 EC data, the percentage of anonymous electors per constituency is 0.007%, but this has been rounded to 0.01% to be conservative. The cost of printing and postage is £0.12 and £0.37 respectively, sourced from an internal Cabinet Office Cost Survey, containing responses from 81 LAs, and the cost of enveloping is £0.03 taken from Royal Mail data.
- 52. The total costs of Voter Card production are between £8 million and £25 million, with a central estimate of £15 million (21/22 prices, 10 year PV)³³.**

Communications costs

³² Data provided to Cabinet Office from the Electoral Office of Northern Ireland

³³ See rounding rules at the start of section F.

53. It is assumed that there will be a justifiable benefit to LA led local communication campaigns, alongside a national campaign led by the EC, as data from pilots shows that most electors found out about the requirement to bring identification through local communications. In the 2019 photo identification pilots, 59% of individuals said they were aware of the identification requirements from leaflets from the local council³⁴. LA campaigns should seek to raise awareness locally using their knowledge of their communities and electors to ensure every voter is aware of the voter identification requirements. The local communications campaign will be different from the EC run national campaign as, whilst they will be delivering the same messages, they will be communicated through different forums.

54. It is assumed that there will be campaigns in the year before the 2024 general election (FY 23/24), as well as in the first year of roll out (FY 22/23) in the LAs holding elections in May 2023. The cost of each communication campaign is calculated using the cost per elector, rather than the cost per LA, because some authorities are much larger than others and therefore may need to spend more on communication. Therefore, an amount of £0.21 per elector is used, based on data provided from Woking pilots who spent an average of £0.25 per elector on promotion materials and communication, however some of what Woking purchased will not be carried forwards to national rollout. Total costs are found by multiplying the cost per elector with the amount of electors voting in each year, for the years where there will be campaigns.

55. The total costs of communications are between £10 million and £30 million, with a central estimate of £20 million (21/22 prices, 10 year PV)³⁵.

Electoral Commission costs

56. The EC will be responsible for public awareness activities across Great Britain to ensure that all voters, including those who may find it harder than others to show identification, understand the new requirements and take action (if their circumstances require) ahead of polling day. It will also be responsible for the provision of guidance and support to Returning Officers as they prepare for and deliver the change. As part of its role in reporting on elections in the UK, the EC will monitor and report on the introduction of the voter identification measures, including any impact on voters.

57. Detailed planning of work requirements will be undertaken in parallel with the passage of the Bill; cost estimates are therefore provided in outline, based on the EC's current understanding of the proposed changes, and on learning from the implementation of other major changes in the democratic process. **The estimated cost, including staffing, is between £8 million and £10 million, with a central estimate of £9m over the appraisal period³⁶.**

F.1.2.2 Indirect costs

³⁴ [Cabinet Office 2019 Voter Identification Evaluation](#)

³⁵ See rounding rules at the start of section F.

³⁶ These are not inflated or discounted as they have directly been provided by the EC.

58. There are no monetisable indirect costs of voter identification.

F.1.2.3 Direct benefits

59. There are no monetisable direct benefits of voter identification.

F.1.2.4 Indirect benefits

60. There are no monetisable indirect benefits of voter identification.

F.1.2.5 Summary - BNPV, NPSV, EANDCB

61. Under the central assumptions, the estimated total quantified benefits and costs are £0 million and £120 million respectively, which provides a Net Present Social Value for voter identification for Option 1 of around **-£120 million (21/22 prices, 10-year PV) over the 10-year appraisal period**³⁷.

Table 4: Summary of monetised impacts for voter identification (£m, 2021 - 2031)

Impact	Low	Central	High
<i>Benefits</i>			
Total benefits	-	-	-
<i>Costs</i>			
Equipment costs	1	2	3
Poll card costs	25	55	80
Staff costs	10	20	30
Training costs	4	7	10
Voter Card costs	8	15	25
Comms costs	10	20	30
EC costs	8	9	10
Total costs	65	120	180
Net Present Social Value	-65	-120	-180

Figures may not sum due to rounding

³⁷ See rounding rules at the start of section F.

62. As there is inherent uncertainty with modelling demand for Voter Cards, analysis has been conducted to estimate the upper and lower bound of the demand for Voter Cards. To account for this, and other uncertainties, a range of +/- 50% of the central scenario has been applied to create a high and low scenario. Under the low scenario, the estimated quantified total costs and benefits are £65 million and £0 respectively, thus **resulting in an estimated NPSV of -£65 million (10-year PV, 2021/22 prices)**. Similarly, under the high scenario, the estimated total costs and benefits are £180 million and £0 respectively, **leading to an estimated NPSV of -£180 million (10-year PV, 2021/22 prices)**³⁸.
63. Further sensitivity analysis has been conducted in section H. These show the change in outputs when the estimated uptake for the estimated Voter Card assumption, the most sensitive assumption, is adjusted.
64. **The Business Net Present Value is expected to be £0** as there are no impacts on businesses which could be included in the scope of the BNPV. Whilst some businesses (for example, those supplying additional equipment, printer manufacturers, delivery companies etc) may benefit from increased profit as a result of the introduction of this policy, it is not proportional to quantify due to the lack of available information around the profit margin of the businesses involved and is therefore excluded from the BNPV.
65. **The Equivalent Annual Net Direct Cost to Business (EANDCB) for photo identification is expected to be £0**, as the only costs that involve businesses are the additional income they will receive from an increase in postage and production, but as this takes place via LAs thus is deemed to be indirect. It is therefore excluded from the EANDCB.

F.1.3 Non-monetised impacts

F.1.3.1 Direct costs

Cost of obtaining an Voter Card

66. Whilst Voter Cards are free, there may be a cost associated with completing an application or travelling to an LA office to collect the card, if it cannot be posted (for example, if an elector applies for a Voter Card close to polling day, and there is not enough time to post it). This may be particularly true for those who live in large, rural LAs and have to take public transport.
67. However, this cost is not monetised as there is no data on the average travel time to a LA office, or how long an application would take, and therefore any estimate would not be robust.

Costs to LAs of local outreach for Voter Card

³⁸ See rounding rules at the start of section F.

68. LAs may wish to set up or utilise local hubs to enable application and collection of Voter Cards. This may be particularly true for large, rural LAs and authorities with limited public transport. However, this cost is not monetised as this is largely dependent on facilities already run by authorities and there is no data to inform estimates of cost.

69. There will need to be a process for the delivery or collection of Voter Cards for electors who apply close to or at the deadline, which may be more difficult in the large, rural LAs and LAs with limited public transport. The 2019 pilot evaluation found that “*electoral services teams felt that the deadline for issuing Voter Card needs to be brought further back from polling day, and they challenged the ability for some rural authorities to issue Voter Card and deliver to electors so close to polling day*”. It is expected that applications close to the deadline would require an in person collection and as such no costs have been monetised.

A small minority of electors may not complete the voting process or may not return to vote after turning up at the polling station without the correct identification

70. The vast majority of people who turned up at the polling station during the 2018 and 2019 voter identification pilots were able to cast their vote. The pilot studies found evidence of a minor impact on people turning up to vote who did not have the correct identification and did not return to vote. In the photo identification model in the pilot studies in 2019, 0.4% of people asked for identification were turned away and did not return to the polling station. There is no evidence of why these individuals did not have the correct identification or did not return. It is possible that a minority were unaware of the requirement. When asked in a survey after the May elections in 2019, a small proportion (13%) of people who did vote at polling stations in pilot areas said they were unaware of the requirement to bring a form of identification with them.³⁹ The communications campaign for this policy would seek to ensure that all voters were aware of the policy and the opportunity to apply for a free, local Voter Card.

71. Overall, a small minority of electors who did not vote in the 2018 and 2019 pilot studies cited identification requirements such as not having the correct identification as the reason for not casting their vote in post-election polling commissioned by the Cabinet Office⁴⁰. The 2019 Cabinet Office pilot evaluation found that the main reason cited across all models for not voting was a lack of time (between 13% and 20% of those who reported not voting in each model). Very few stated a reason related to not having the correct identification (34 out of 1,749 who said they did not vote, or 2%), a similar proportion to 2018 pilots. The EC’s 2019 evaluation found a similar proportion, 1% of those who did not vote, who said this was because they did not have identification⁴¹. Similarly, very few stated they did not vote because they disagreed with the requirement. The EC’s evaluation of the pilots found that of those who reported not voting in the May elections in pilot authorities in a post-election survey, less than 0.5% said they did so because they *did not agree with* the identification requirement.

³⁹ Electoral Commission, Identification [pilots post-poll participating areas 2019 Spreadsheet](#), Table 83, column AT

⁴⁰ [2018 Voter Identification Pilot Evaluation](#) (overall sample of 500 in each of the five identification pilot areas); [2019 Voter Identification Pilots Evaluation](#) (overall sample of 600 in each of Woking and Pendle).

⁴¹ Electoral Commission, Voter identification pilots post-wave report 2019

72. There is no evidence of the potential impact of this in a General Election where turnout is generally higher than local elections⁴². However, in a Cabinet Office commissioned survey of respondents in Great Britain in 2021,⁴³ only 2% of people in Great Britain were found not to have at least one form of photo identification out of the identifications expected to be accepted under the policy. An equal proportion of individuals said having to present photo identification at the polling station would make them less likely to vote (5%) as said it would make them more likely to vote (5%). The majority (89%) said it would make no difference. While we cannot assess the potential impact of the policy on turnout for the reasons set out in the methodology section, we cannot rule out the potential that some electors could be discouraged from turning up at the polling station as a result of the measures. This is why the communications campaigns are a key strand of the policy to ensure that electors have plenty of notice in advance of polling day of the changes.

73. These figures were broadly similar in the Cabinet Office's evaluation of the 2019 pilots⁴⁴ where in the photo identification pilot areas, 7% said it made them less likely to vote, and 7% said it made them more likely to vote.

74. Voters will continue to have access to three methods of voting - in person at a polling station, by proxy vote, and by postal vote. The 'wider impacts' section outlines how the new requirements might impact on electors' intention to vote in person. The Voter Card will provide a free form of identification that electors can apply for if they want to vote in person or act as a proxy and do not have one of the required forms of identification. In addition, organisations representing age, race, and gender reassignment have highlighted that certain groups with protected characteristics may face attitudinal difficulties with presenting identification, some based on previous negative experiences. This is discussed further in the Equality Impact Assessment for the Bill, along with mitigations that will be taken to address these potential impacts.

Cost of creating an online Voter Card application service

75. Electors without approved forms of identification will be able to apply for a free, local Voter Card online. This may require the development of an automated or digital service alongside or in place of the service tested in the voter identification pilots. Any new service will incur an additional cost be it digital or otherwise. Potential options are currently in the early stages of discovery along with further scoping of delivery impact and implementation risk. The options available will be identified by the discovery work after which it will be possible to identify the associated potential costs for development, delivery and implementation. Therefore, this cost is not monetised, but there will be further analysis undertaken at the secondary legislation stage.

Cost of data storage

⁴² House of Commons Library, [Turnout at elections](#), July 2017

⁴³ [Cabinet Office Photographic Identification Ownership Survey, 2021](#)

⁴⁴ [Cabinet Office Voter Identification Pilots Evaluation 2019 Spreadsheet, Table 47, column AF and J](#)

76. There may be a need for LAs to store some information relating to Voter Card applications on the LA's election management system. However, this cost is not monetised as further scoping will first be required to better understand how this will work in practise.

F.1.3.2 Indirect costs

More people opting for postal votes

77. The new requirements for voting in person outlined above may lead to more people opting for postal or proxy voting, which could potentially increase costs to the UK government. However, the EC's 2018 evaluation of the voter identification trial did assess the impact on postal voting and found no evidence of any notable move towards postal voting instead of polling station voting in any of the five pilot areas⁴⁵. In addition, 6% of individuals responding to a 2021 survey commissioned by the Cabinet Office said having to present photo identification would make them less likely to vote *in person*, while 5% said it would make them more likely to vote in person, suggesting overall there may be little change. The majority, 89%, said it would make no difference to how they would vote. These costs therefore have not been quantified.

F.1.3.3 Direct benefits

Increased belief that there are sufficient safeguards to prevent electoral fraud

78. While overall concern about electoral fraud among the electorate is low, authorities in the 2019 pilots trialling the photo identification model were the only authorities to show an increase in those disagreeing that there is enough electoral fraud in polling stations to affect election results, with 35% saying they strongly or tended to disagree, up from 30% prior to polling day. This was largely driven by the Pendle pilot.

79. In addition, the photo identification model saw substantial increases from before polling day to after polling day in the belief that there are 'sufficient safeguards' to prevent electoral fraud in polling stations, from 57% to 63%, and that voting at polling stations is safe from fraud and abuse with 90% agreeing with this, up from 85%. Conversely, people in other areas of England holding elections were more likely to disagree after polling day that there are sufficient safeguards in place (20% after polling day, up from 16% before polling day). These improvements in perceptions of local electoral integrity were also seen in the 2018 photo identification pilot in Woking.

80. There was mixed evidence of the impact the 2019 photo identification models had on perceptions of the incidence of electoral fraud in the local area. In Woking there was a substantial decrease in perception that there is a great deal or fair amount of electoral fraud at the polling station in their area from 14% to 9%. This was not the case in Pendle where

⁴⁵ [Electoral Commission 2018 Voter Identification evaluations: Bromley May 2018 voter identification pilot evaluation](#); [Gosport May 2018 voter identification pilot evaluation](#); [Swindon May 2018 voter identification pilot evaluation](#); [Watford May 2018 voter identification pilot evaluation](#) and [Woking May 2018 voter identification pilot evaluation](#)

a third of respondents felt that fraud takes place in their local area, which remained unchanged from before the election⁴⁶.

81. The EC's evaluation of the 2019 pilot noted "*It is not possible to assess whether the identification requirement prevented any actual attempts to commit impersonation fraud*" and that "*There is no evidence to suggest that the absence of allegations in the pilots was because of the identification requirements.*" However, when evaluating the security strengths and weaknesses of each model it found "*the photo identification only model has the greatest security strengths compared with the other models*"⁴⁷. The policy addresses the EC's recommendation from its 2014 review into electoral fraud that electors should be required to show proof of their identity before they can be issued with a ballot paper at polling stations for elections and referendums in Great Britain⁴⁸. It also brings the UK in line with practices by many other countries where voters are required to present some form of identification in order to vote⁴⁹.

Increased satisfaction in the electoral process

82. In the 2018 photo identification pilot in Woking, satisfaction with the process of voting increased substantially post election day (82% to 90%). This was eight percentage points higher than the England control group which suggests that, overall, taking part in the photo identification model had a positive impact on perceptions of the voting process⁵⁰. In 2019, levels of satisfaction in the process of voting in photo identification pilot areas remained stable after polling day (83%, up from 82% prior to polling day), as did confidence in knowing how to cast their vote (96%, compared to 95% prior to polling day)⁵¹.

83. However, in the EC's 2019 evaluation satisfaction with the process of voting decreased post election day, both in pilot areas (73% in mixed pilot areas, 69% for photo pilot areas and 68% for poll card pilot areas, compared to 83% for all pilot types in the pre wave) and across England as a whole (62% in the post poll, compared to 77% in the Winter Tracker survey)⁵². Since this was seen at national level as well as in pilot areas they concluded that this suggested the pilots were not the cause of the increase.

Delivery benefits for administration

84. The photo identification model is less complex to deliver than the mixed identification model because of the simpler identification requirements. Evidence from the published 2018 CO evaluation suggests those in the photo identification model found the process more straightforward than the mixed identification model: In qualitative interviews, it was suggested, "*they kept their list of acceptable identifications short to make the process straightforward, and as a result found the data capture process easier than authorities*

⁴⁶ [2019 Voter Identification Pilots Evaluation](#)

⁴⁷ Electoral Commission, "Impact on security", October 2019

⁴⁸ [Electoral Commission, Electoral fraud in the UK: Final report and recommendations, January 2014](#)

⁴⁹ [Electoral Commission, Electoral fraud in the UK: Final report and recommendations, January 2014](#)

⁵⁰ [2018 Voter Identification Pilot Evaluation](#)

⁵¹ [2019 Voter Identification Pilots Evaluation](#)

⁵² Electoral Commission, Identification [pilots post-wave report 2019](#)

*trialing the mixed model*⁵³.

F.1.3.4 Indirect benefits

Increased engagement with vulnerable groups and civil society groups

85. Engagement with the equality duty was found to increase across all authorities as the result of piloting voter identification. Authorities viewed this as a positive engagement exercise with vulnerable groups and civil society groups, and most electoral services teams reported wanting to continue this, although some flagged that they would need an additional dedicated resource to coordinate equality impact work in the event of national rollout⁵⁴.

Increased sales for businesses

86. As set out in section F.1.2.1, LAs will be buying additional equipment for use in polling stations to assist with the implementation of voter identification when voting. This directly benefits the businesses supplying this equipment through increased sales, and therefore profit.

87. Businesses will also benefit from increased postage resulting from voter identification, including from poll cards now being larger and being posted in envelopes and additional letters being sent to anonymous electors, increasing sales for printing and postage businesses. However, these benefits have not been monetised as there is no data regarding how much profit businesses would make on these sales, and it is therefore not proportionate to quantify this estimate.

F2. Absent Voting

F.2.1 Methodology

88. To calculate the additional costs resulting from the changes to the absent voting policy, the number of long term postal and proxy voters was found using data from the 2019 General Election, then uplifted for increases in population in the same way as in the voter identification model.

89. Reports from the 2019 General Election shows that there were 8.1 million registered postal voters and 0.3 million registered proxy voters in Great Britain. These estimates have been carried forwards to inform total costs.

90. The increased costs are found by working out the additional cost of sending an extra letter to long term postal and proxy vote holders, therefore an assumption of the percentage of registered postal and proxy voters who were long term absent voters was needed. This is assumed to be 100% for postal voters, and 96% for proxy voters, based on data from the 2019 general election where 4% of proxies were emergency proxies, and therefore not long term.

⁵³ [2018 Voter Identification Pilot Evaluation](#)

⁵⁴ [2019 Voter Identification Pilots Evaluation](#)

F.2.2 Monetised impacts

F.2.2.1 Direct costs

Postal voting

91. The changes mean that postal voters will now have to register every 3 years, rather than every 5 years (i.e. to provide fresh personal identifiers), and they will be contacted twice by post during this process. This means that long term postal voters will be contacted more often to ask them to renew their postal vote registration, increasing costs.
92. It is estimated that posting one A4 letter costs £0.52, based on data from an internal Cabinet Office Cost Survey. The cost of sending letters to contact postal voters under the current registration process was calculated, as well as the cost under the new process and the difference was found - giving the total increase in costs due to the changes.
93. The business as usual cost of sending letters was calculated by assuming that one fifth of postal vote holders renew their registrations in a given year (as registrations currently need to be renewed every 5 years), and estimating the cost of sending renewal reminder letters. Each elector whose postal vote was due for renewal in a given year received an initial contact letter to remind them of renewal. Electors were then contacted again to give a first reminder if they do not renew after the initial contact letter. If electors then did not renew after this second letter, they would receive a third letter to confirm they have been deleted from the postal voting register. It is estimated that 42.3% of those who received an initial letter got a first reminder letter (assuming all others renewed after the initial contact) and 22.8% then received a deletion letter. These were calculated using data from the 2018 electoral register.
94. The cost of sending these letters was calculated by multiplying the number of letters sent, found using the estimate of the number of long term postal vote holders, by the cost of sending a letter.
95. The cost of sending letters under the new renewal process is calculated by dividing the number of long term postal vote holders by 3 (as each voter renews once every 3 years, so it is assumed that one third of voters renew each year). This number is then multiplied by the number of letters sent out (2 to each person renewing that year) and the cost of printing, postage and enveloping, £0.52 per letter.
96. The difference in costs is due to the change to the renewal cycle. Previously, 1 letter was sent to postal vote holders who needed to renew their registration in a given year, with 2 follow up letters sent to those who do not respond to the previous letters. Under the new proposals, 2 letters will be sent to postal vote holders who need to renew their registration in a given year, and all applicable electors will receive 2 letters. The change in the amount of letters, as well as the increased frequency, changes the costs of renewing postal voting registrations.

97. The total costs of increasing contact postal voters is between £6 million and £15 million, with a central estimate of £10 million (21/22 prices, 10 year PV)⁵⁵.

Proxy voting

98. Long term proxy holders will be required to re-register as a long term proxy holder when the policy comes into place in 2023 (it is currently planned that they will need to re-register by 31 January 2024), as a result of the change to the number of people an individual can act as a proxy for. As a result, all long term proxy holders will be sent a letter to inform them of their need to re-register. They will then receive a follow up letter to either confirm their renewal or that they are no longer a proxy vote holder.

99. There are costs associated with this re-registration process as 2 additional letters will be printed, posted and enveloped. The increased cost of this contact is found by multiplying the number of long term proxy voters by the amount of letters sent to each applicable elector renewing their absentee voter status (2) and the cost of posting one A4 letter (£0.52). These costs will be one off, and will be borne in 2023/24.

100. The total costs of additional contact to long term proxy voters is between £0.1 million and £0.4 million, with a central estimate of £0.3 million (21/22 prices, 10 year PV)⁵⁶.

F.2.2.2 Indirect costs

101. There are no monetised indirect costs resulting from this policy.

F.2.2.3 Direct benefits

102. There are no direct monetised benefits resulting from this policy.

F.2.2.4 Indirect benefits

103. There are no indirect monetised benefits resulting from this policy

F.2.2.5 Summary (NPSV, BNPV, EANDCB)

104. Under the central assumptions, the estimated total quantified benefits and costs are £0 million and £10 million respectively, which provides a Net Present Social Value for Absent Voting for Option 1 of approximately **£10 million (21/22 prices, 10-year PV) over the 10-year appraisal period⁵⁷.**

Table 5: Summary of monetised impacts for Absent Voting (£m, 2021 - 2031)

⁵⁵ See rounding rules at the start of section F.

⁵⁶ See rounding rules at the start of section F.

⁵⁷ See rounding rules at the start of section F.

Impact	Low	Central	High
<i>Benefits</i>			
Total benefits	-	-	-
<i>Costs</i>			
Postal voting	6	10	15
Proxy voting	0.1	0.3	0.4
Total costs	6	10	20
Net Present Social Value	-6	-10	-20

Figures may not sum due to rounding

105. As there is inherent uncertainty with modelling Absent Voting, analysis has been conducted to estimate the upper and lower bound of these estimates. This is estimated to be +/- 50% of the central scenario. If the low scenario is used, then the estimated quantified total costs and benefits are £6 million and £0 million respectively, thus **resulting in an estimated NPSV of -£6 million (10-year PV, 2021/22 prices)**. Similarly, under the high scenario, the estimated total costs and benefits are £20 million and £0 million respectively, **leading to an estimated NPSV of -£20 million (10-year PV, 2021/22 prices)**⁵⁸.

106. **The Business Net Present Value is expected to be £0** because there are no direct, monetised costs to businesses as a result of the new Absent Voting measures. Whilst some businesses may benefit from increased profit as a result of the introduction of this policy, this is an indirect impact, it is difficult to quantify and is a transfer and is therefore excluded from the BNPV.

107. **The Equivalent Annual Net Direct Cost to Business (EANDCB) for Absent Voting is expected to be £0**, as the only costs that involve businesses are the additional income they will receive from an increased sales, but as this takes place via LAs thus is deemed to be indirect.

F.2.3 Non-monetised impacts

F.2.3.1 Direct costs

108. There are no direct non-monetised costs associated with this policy.

F.2.3.2 Indirect costs

109. There are no indirect non-monetised costs resulting from this policy.

⁵⁸ See rounding rules at the start of section F.

F.2.3.3 Direct benefits

Increased integrity/ reduced perception of fraud

110. These measures will reduce the opportunity for postal votes to be harvested, and measures limiting the number of people for whom a person may act as a proxy could reduce coercion by those acting as a proxy, potentially reducing the opportunity for fraud and the perception of fraud. Similarly, extending secrecy provisions to postal voting also reduces the opportunity for fraud in the process.
111. However, this benefit is not monetised because there is no data indicating the value of reduced electoral fraud and perceptions of fraud.

F.2.3.4 Indirect benefits

Increase in sales for postal businesses

112. There may be an additional benefit to postage firms as a result of the increased sales from additional postage. However, this benefit has not been monetised as there is no indication of the level of profit businesses would make on the increased sales.

F.3 Online Absent Vote Applications

F.3.1 Monetised Impacts

F.3.1.1 Direct Costs

113. While there are direct monetisable costs relating to this policy, the policy will require implementation costs in order to implement the policy design developed for future secondary legislation; therefore at this stage this impact assessment has considered these costs qualitatively in the 'non-monetised impacts' section below. This is explored in more detail in the 'non-monetised impacts' section below and monetised impacts will be provided in any supported analysis published alongside secondary legislation changes.

F.3.1.2 Indirect costs

114. There are no indirect monetisable costs relating to this policy.

F.3.1.3 Direct benefits

115. There are direct monetisable benefits relating to this policy as the introduction of an online registration system for absent voters may lead to efficiency savings for Electoral Registration Officers. However, this is difficult to quantify due to the uncertainty around how this policy may impact electors, and the consequent change in volumes as a result. This is explored in more detail in the 'non-monetised impacts' section below and monetised

impacts will be provided in any supported analysis published alongside secondary legislation changes.

F.3.1.4 Indirect benefits

116. There are no indirect monetisable benefits relating to this policy.

F.3.2 Non-monetised impacts

F.3.2.1 Direct costs

Deterring voters from applying via postal/proxy methods due to identification requirements

117. The requirement for identity verification as a part of the online application process for absent votes could deter some voters from voting (and using this method specifically) if they find it difficult to verify their identity or are reluctant to do so. This may impact the integrity of the elections as it may lead to lower turnout, however there is limited evidence to quantify the impact of this. Furthermore, individuals already need to verify their identity before they can register to vote and such a change would bring absent vote applications in line.

Increase in costs as a result of identity verification requirements

118. The introduction of identity verification requirements may lead to an increase in costs to local authorities as they will need to manually check applications which have not been verified through an automated digital process. The details of the identification process will be outlined in secondary legislation. A similar process is currently in place for applicants using the Register to Vote digital service, which uses the IERDS to match an applicant's identification based DWP data on NINO, date of birth and name. Where an applicant cannot be digitally matched, electoral service teams within local authorities then undertake local data matching (i.e. match an applicant's identification using local data such as council tax records), request identification documents from the applicant to verify their identity via the exceptions process and/or request an attestation.

119. However, this is likely to be small as the IERDS run by the Cabinet Office, which currently matches based on NINO, date of birth and name, estimates that around 8.6%⁵⁹ of applicants are not matched in DWP's system and thus require manual verification. This is also likely to be more than offset by the efficiency savings of introducing an online registration system and improvements to the identity verification process (which will reduce the number of applications going through the exceptions process). However, if the introduction of absent voting application digital service results in a change in elector behaviour with an increase in the total volume of absent vote applications, this could lead to the additional costs not being offset, however this is uncertain. The proportion of electors who will require manual verification checks are also likely to vary by local authority, and thus costs will also vary too.

⁵⁹ Internal Cabinet Office data taken from the Individual Electoral Registration digital service from applications uploaded in the 2020 calendar year.

120. As outlined in the absent voting section the requirement for electors to reapply for a postal vote every three years will lead to an increase in registration costs for EROs. The introduction of ID verification requirements for absent voting applications will result in further increases in ERO workloads on the additional postal vote applications created to the move to a three year cycle. However, this may also be offset by the efficiency savings of introducing an online registration system.

Implementation digital costs including EMS costs

121. A digital service for online absent vote applications will be built alongside changes being made to the existing IERDS run by the Cabinet Office and to the specialist electoral management software (EMS) used by LA electoral services teams to build the workflows and data capture processes to enable them to successfully register absent voting preferences. The full digital specifications and cost estimates will be developed as a part of future service design post primary legislation.

F.3.2.2 Indirect costs

Potential increase in costs for EROs due to more postal and proxy voting

122. The introduction of an online registration system for absent voting could see an increase in the number of people who choose to vote absently, as opposed to voting in person. Rational Choice Theory dictates that the easier and more convenient it is for somebody to do something, the more likely they are to carry out that action. Whilst it is difficult to accurately quantify the change in volumes, Cabinet Office analysts conducted an evidence review to look at how the take-up of certain services change when they are digitalised. The UK Government's Register to Vote digital service has increased in popularity on a yearly basis, from a low of 46% of total applications to register to vote being made online in November 2016, to 95% in May 2021⁶⁰, however, this may partially be attributed to both the proximity to elections and Covid-19. When looking at overseas electors specifically, the introduction of the Register to Vote digital service saw a spike in overseas registered electors from a high of 35,000 before 2015 to 230,000⁶¹ at the time of the general election of December 2019. However again, it cannot solely be attributed to the introduction of the Register to Vote digital service given the number of large election events that took place between 2015 and 2017, including most notably the referendum on EU membership in 2016 in which many overseas electors had a specific interest.

123. The scale of absent voting is lower than register to vote applications made, therefore a lower number of applications would be submitted via a new online absent voting application service than the Register to Vote website. In December 2019, there were 48 million electors at the time of the UK Parliamentary election. Of which, 8 million held a postal vote and 300,000 held a proxy. Table 6 outlines the volumes of absent votes held have remained at similar levels in the previous three UK Parliamentary elections.

⁶⁰ <https://www.registertovote.service.gov.uk/performance#past-year> (See Online take up: 1 to 31 May 2021)

⁶¹ [House of Commons Briefing Paper \(Number 5923, 12 May 2021\) Overseas Electors.](#)

Table 6: Volumes of Absent Votes held by electors at previous UK Parliamentary Elections, Electoral Commission⁶²

UK Parliamentary elections	Number of Postal Votes Issued	Number of Proxies Appointed
2019	8,183,542	274,684
2017	8,412,060	283,928
2015	7,592,735	149,444

F.3.2.3 Direct benefits

Cost savings for EROs

124. Internal research suggests that it is up to five times faster for EROs to process online absent vote applications compared to paper-based applications, and therefore assuming the volume of applications was to remain broadly similar, it is likely that this will lead to a cost saving for EROs. However, this research does not cover the cost to EROs of verifying the identity of applicants who go through the exceptions process - that is those who are not successfully verified by the automated identity verification process. There will also be the additional cost to EROs to verify identity checks under the paper-based system too which does not take place under the current system. However should the proportion of those going through the additional identity verification undertaken by electoral service teams in local authorities, upon not being matched with national data, steps be similar to the 8.6% of register to vote applications, these costs are likely to be outweighed by the efficiency savings⁶³.

125. An increase in the volume of applications for absent votes (due to the process being put online) may reduce this cost saving (and even lead to an increase in costs), but there is currently insufficient evidence to outline how volumes may change. Further analysis will be done ahead of secondary legislation to quantify this impact where possible.

Lower postal costs for Local Authorities

126. There are also estimated to be cost savings for local authorities with the introduction of the online absent vote application service as they will likely post fewer forms as more people will use the online system (rather than a paper-based one), which will lead to a reduction in cost.

Improved accessibility for electors

⁶² <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/past-elections-and-referendums/uk-general-elections>

⁶³ This is based on internal Cabinet Office data.

127. Electors will no longer need to download, print and scan forms with the introduction of the online system, nor will they need to arrange with their local authority to ask for a form. This will improve accessibility for electors and there will be a time saving for them compared to the paper-based forms. This may be of particular benefit to certain groups such as students, working professionals, people with young children and those with disabilities. However, there is no evidence to quantify what this time saving might be.

F.3.2.4 Indirect benefits

Increase in number of postal and proxy voters due to online system

128. Moving the application process for absent voting online (alongside the existing paper process) will make it easier for some electors to vote. This could potentially lead to an increase in the number of postal and proxy voters, and possibly even voter turnout, due to the introduction of the online system. The 2019 General Election found that total turnout was 67.9%, whereas it was significantly higher at 83.9% for postal ballots in the UK⁶⁴.

129. However, evidence for this is largely mixed, US-based research by Mann and Sondheimer (2009) found that those who had voted in-person in previous elections were more likely to vote by mail when given the option compared to those who had not voted in previous elections,⁶⁵. This shows that any increases in the number of postal and proxy voters is likely to be attributed to a shift from in-person voters, rather than new voters altogether. However, this evidence is not UK-specific and therefore may not be entirely representative of elector behaviour in the UK.

F.4 Accessibility

F.4.1 Monetised impacts

F.4.1.1 Direct costs

130. There are no direct monetisable costs relating to this policy. This is because, whilst it is known that ROs are likely to buy new equipment to aid voters in polling stations, there is no data to indicate what equipment they may purchase, or how much. The reason for this is because the Bill is aiming to provide ROs with greater flexibility to purchase equipment to aid voters. This means that the equipment purchased is likely to vary across polling stations so that ROs can tailor the equipment purchased to the needs of their specific electorate.

F.4.1.2 Indirect costs

⁶⁴ <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/past-elections-and-referendums/uk-general-elections/report-overview-2019-uk-parliamentary-general-election>

⁶⁵ Cuciti and Wallis (2011), Changing the Way Colorado Votes, <https://www.sos.state.co.us/pubs/newsRoom/issueFiles/2013/CUDenverElectionReformStudy02012011.pdf>
Mann and Sondheimer (2009), The Role of Local Election Officials in Promoting Growth of Mail Voting (unpublished manuscript, Department of Political Science, University of Miami) referenced/quoted in Cuciti and Wallis (2011) above.

131. There are no monetisable indirect costs relating to this policy.

F.4.1.3 Direct benefits

132. There are no monetisable direct benefits relating to this policy.

F.4.1.4 Indirect benefits

133. There are no monetisable indirect benefits relating to this policy.

F.4.2 Non-monetised impacts

F.4.2.1 Direct costs

134. Under this policy, ROs will be able to buy the equipment they think best allows those with disabilities to vote unaided, by removing the requirement to buy a specific device. Whilst the EC will be providing some guidance on the type of equipment ROs should consider, in conjunction with the Government chaired Accessibility of Elections Working Group, it is not an exhaustive list, nor is there a requirement for ROs to choose from this list specifically. Therefore, whilst ROs will have to purchase some equipment, this cost is not monetised because there is no information regarding what equipment will be bought, and how much, and it is likely to vary across polling stations according to the demographics of the electorate.

F.4.2.2 Indirect costs

135. There are no non-monetised indirect costs associated with this policy.

F.4.2.3 Direct benefits

More flexibility for Returning Officers

136. ROs will be able to choose equipment that best suits the needs of their electorate. People with a wider range of disabilities will be supported in polling stations, improving accessibility in voting. Guidance will also be easier to update, allowing the newest and best options to be added easily. However, this benefit has not been monetised due to the wide range of equipment that ROs can purchase, and there is a lack of data to suggest the specific equipment ROs will invest in.

Greater access to voting for people with disabilities

137. Under the new powers, ROs will be required to consider the needs of and provide support to people with a wider range of disabilities in the polling station enabling them to more easily cast an in-person vote. This will improve the accessibility of voting. However, this benefit has not been monetised as there is no data to indicate how much increases in accessibility are worth.

F.4.2.4 Indirect benefits

Benefit to business from increased sales

138. ROs will buy new equipment to improve accessibility in polling stations for those with disabilities. This creates an indirect benefit to the business supplying the equipment from increased sales and profit. However, this benefit is non-monetised because there is no data to suggest what specific equipment ROs will purchase, and there is no indication of how much profit would be made on these sales.

F.5 Overseas Electors

F.5.1 Methodology

139. The overseas electors policy changes will extend the UK parliamentary franchise (the population who are eligible to vote in UK parliamentary elections) to all British citizens overseas over the age of 18 who have been previously registered to vote or have been resident in the UK. The main benefits of an increased franchise on UK democracy are non-monetisable and as such are not quantified in the analysis below. An increased franchise will result in additional electoral registration and electoral costs for which estimated monetised estimates are provided below. There is a direct relationship between the non-monetisable benefits and monetised costs: successful implementation of the overseas elector policy changes resulting in higher uptake of voter registration amongst the newly enfranchised overseas electors will also result in higher ongoing electoral registration and electoral costs due to the increased size of the franchise.

Current System

140. Currently, to register as an overseas elector you must be a British citizen⁶⁶ and have been registered to vote in UK Parliamentary Elections in the UK within the previous 15 years (or, in some cases, you may register if you were too young to have been registered before you left the UK)⁶⁷. Individuals are only entitled to register in respect of the address at which they (or their parent/guardian) were last registered to vote in the UK.
141. Persons seeking to register in Great Britain may apply online via the Register to Vote Service or by paper forms; in Northern Ireland applicants can currently only register by paper forms. An application also includes an overseas elector's declaration, containing information about the applicant's entitlement to be an overseas elector. Overseas electors, unlike domestic electors, must renew their declaration each year, when prompted to do so, otherwise they are removed from the register.
142. Once an application has been submitted, the ERO will check the details and decide whether the applicant is entitled to be registered. The applicant's identity is initially verified

⁶⁶ Other types of British national, such as British Overseas Territories Citizens, are not eligible.

⁶⁷ Individuals who lived in the UK as children, prior to moving abroad, are eligible to register as overseas electors if their parent or guardian was on the electoral register at the place where they were resident in the UK. However, this is also subject to a 15 year limit, from when the individual left the UK.

in the same way as any UK-based applicant, using their National Insurance Number (NINo) and date of birth. Overseas applicants whose identity cannot be verified this way are asked to provide an attestation, in which a registered elector makes a signed statement confirming the applicant's identity.

143. The applicant's previous registration at the address at which they are applying to be an overseas elector must also be verified. This is done through ERO checks of previous electoral registers, which are typically kept for at least 15 years.
144. Once registered, overseas electors are entitled to vote in UK Parliamentary elections, including by-elections (the franchise for UK-wide referendums is established on a case-by-case basis).
145. Overseas electors in Great Britain may vote by postal ballot, by proxy or at a polling station in their constituency if they are in the UK on the date of the poll. Overseas electors registered in Northern Ireland are not permitted to vote via post, but may vote in person or via a proxy.

Franchise Changes

146. This policy aims to extend the franchise to all British citizens overseas who have been previously registered to vote in the UK, or previously resident in the UK. This will result in two key changes to the franchise:
 - a. Any British citizen overseas who was last registered to vote in the UK over 15 years ago will be eligible; and
 - b. Any British citizen overseas who was previously resident in the UK but not registered to vote as a domestic elector will be eligible.
147. These changes would remove the current '15-year rule', which is undesirable and outdated in an increasingly global and connected world. Extending the franchise to those previously registered or resident sets a sensible boundary for the overseas franchise. It maintains a substantial degree of consistency with the existing system, and previous registration or residence denotes a strong degree of connection to the UK that may not be present amongst British citizens overseas who have never been registered or resident here (for example, some British citizens by descent).
148. No changes are proposed to existing restrictions on which elections overseas electors can participate in. Limiting the franchise to UK Parliamentary elections reflects the fact that British citizens overseas are more likely to be directly affected by decisions taken by the UK Government, than they are by decisions made by local governments.

Increase to the UK parliamentary overseas elector franchise

149. The expected increase in the size of the overseas elector franchise, due to the Bill proposals, has been modelled based on United Nations (UN) data⁶⁸ on the total number of British Citizens living abroad and the ONS International Passenger Survey (IPS)

⁶⁸ [International Migrant Stock](#): The 2017 Revision

dataset.⁶⁹ Our modelling provides forecasts for the total volumes of the overseas franchise and those British Citizens living abroad joining and leaving the franchise each year. The franchise estimates are shown in table 7.

150. The intention is for the franchise change to take place in 2023, therefore the volumes before then are the same in Options 0, 1 and 2. Under Option 1 and Option 2 the overseas elector policy changes are identical therefore figures are presented together throughout our analysis.

Table 7: Estimated volumes at the end of each year of the overseas franchise (Million)

Year	Option 0	Option 1 & Option 2
2021/22	1.0 - 1.2	1.0 - 1.2
2022/23	1.0 - 1.1	1.0 - 1.1
2023/24	0.9 - 1.1	3.2 - 3.4
2024/25	0.9 - 1.1	3.2 - 3.4
2025/26	0.9 - 1.1	3.2 - 3.4
2026/27	0.9 - 1.0	3.2 - 3.3
2027/28	0.9 - 1.0	3.2 - 3.3
2028/29	0.9 - 1.0	3.2 - 3.3
2029/30	0.8 - 1.0	3.2 - 3.3
2030/31	0.8 - 1.0	3.2 - 3.3

151. Registration rates (percentage of the eligible population registered to vote) for overseas electors are generally lower than ordinary electors, and it is not expected that all of the newly enfranchised British Citizens living abroad will register to vote. For example, in 2019, the year of last UK parliamentary election, the ONS⁷⁰ and National Records of Scotland (NRS)⁷¹ report that 204,000 overseas electors were registered to vote in Great Britain at the end of the registration year. Of the total overseas franchise at the time, 1.2m, we estimate this is equivalent to 16.9% of eligible British Citizens living abroad registering to vote as overseas electors.

152. The cost of extending the franchise is dependent on the volume of eligible British Citizens living abroad who register to vote after being enfranchised. Our modelling assumes that during UK parliamentary election years the registration rate within the extended overseas franchise will be consistent with levels recorded in recent UK parliamentary election years. In doing so our analysis assumes the percentage of the franchise who apply to register to vote and fail to renew their registration status will remain

⁶⁹ [International Passenger Survey](#): 3.15 and 4.07 (2018)

⁷⁰ [ONS](#): Overseas, anonymous, opted-out and Parliamentary electors by LA (2017, 2019)

⁷¹ [NRS](#): Electoral Statistics for Scotland (2017, 2019)

at current levels. Table 8 presents the percentages used within our analysis which are based on registration data⁷² from recent years.

Table 8: Summary of registration rate assumptions

Value	Assumption
4.7%	Percentage of eligible British Citizens living overseas assumed to submit a successful application to register to vote during a non-election year.
17.8%	Percentage of eligible British Citizens living overseas assumed to submit a successful application to register to vote during an election year.
67.3%	Percentage of overseas electors sent a renewal request to renew their entry on the electoral register who do not renew and are removed from the register.

153. The main assumption that has been made for the overseas electors analysis is that the newly enfranchised electors behave in the same way as the currently enfranchised overseas electors, and their behaviour is consistent over time:

- a. The main impact of this assumption is on the predicted registration rates, which have a substantial impact on the costs of the policy. This has been examined further in the sensitivity analysis.
- b. The costs associated with registration, renewal and voting do not change, except where necessary and consequential changes are made to the user journey. For example, in Option 1 and 2 the addition of new identity check options, address verification processes and the alignment of the absent voting and renewal processes. The uncertainty in this has been captured in the standard 50% range applied to the NPV.
- c. All forecasts for the volumes of overseas electors are based on the average of the last 5 years of data collected. This assumption only impacts the size of overseas franchise, which is used to calculate the registration rates. Therefore any uncertainty in this is captured as part of the sensitivity analysis when the total registration rates are changed.

F.5.2 Monetised impacts

F.5.2.1 Direct costs

Implementation Costs

154. The successful delivery of the overseas elector policy changes requires various one-off costs of implementation. Where monetised, the requirements of implementation have been costed using the cost profiles of recently completed Cabinet Office projects which have also made changes to the wider UK electoral registration and electoral system. Some of the implementation costs will be subject to service design post primary legislation.

⁷² The Individual Electoral Register Digital Service within the Cabinet Office collects data registration volumes

Where this is the case these costs have been included in the non-monetised section of this impact assessment.

Implementation Costs: Training Costs

155. LAs will be responsible for registering the newly enfranchised overseas electors. There are several new registration processes being introduced, for which LAs where necessary, will be provided guidance and training to deliver them.
156. Total training costs are estimated to be between **£0.1 and £0.4 million, with a central estimate of £0.3 million (21/22 prices, 10 year PV)⁷³**.

Overseas Electors Electoral Registration and Electoral Costs: Methodology

157. Overseas elector voter registration costs within local government and overseas elector voting costs provided by central government will increase as a result of the increased franchise and total volumes of overseas electors:
- a. *Registration*: Within the registration process the additional overseas electors who register as a result of the changes will present a large extra burden on LA resources, as electoral service teams are responsible for the voter registration of overseas electors.
 - b. *Elections*: Future UK parliamentary elections will be more costly as a result of the additional votes cast by additional overseas electors who register and vote as a result of the policy changes and larger franchise. UK parliamentary elections are funded directly out of the Consolidated Fund by central government.
158. Our analysis estimates the additional burden on local government due to an increased overseas franchise both in regards to any additional costs of correspondence with individuals registering or registered to vote as overseas electors and any additional costs of local government staff time.
159. In appraising the local government staff time and correspondence costs of additional overseas electors registering as a result of the policy changes we have grouped overseas elector electoral registration with a cost impact into the following four categories:
- a. *Registering an overseas elector*: the additional cost of registering overseas electors. This includes the cost of identity and eligibility checks as part of an application to register to vote, processing and confirmation the addition of overseas electors to the register and set-up of an absent vote.
 - b. *Renewing an overseas electors registration*: the additional cost of issuing and processing successful renewals.
 - c. *Removing an overseas electors registration following them failing to renew*: the additional cost issuing and processing unsuccessful renewals from overseas electors. This also includes the cost of removing an overseas elector from the register after the unsuccessful renewal.
 - d. *Removing an overseas elector from the electoral register, due to them registering*

⁷³ See rounding rules at the start of section F.

elsewhere: the additional cost of removing an overseas elector from the register if they return to the UK.

and a fifth category for overseas elector election activities with a cost impact:

- e. *Voting*: the additional cost of overseas electors taking part in UK parliamentary elections. This includes the cost of arranging postal and proxy ballots for overseas electors living abroad.

160. For each of the five categories above a unit cost has been established for the cost of that stage of the electoral registration and electoral process.

Registration Changes: Address Verification

161. Changes will be made to the registration process to provide for the franchise change. As now, overseas electors would be entitled to register in respect of just one UK address. Applicants would be required to apply to register at:

- a. The last address at which they were registered, or, if they were never registered,
- b. The last address at which they were resident.

162. This approach is intended to maximise continuity with the existing system, which electors and administrators are familiar with. It will also ensure that overseas electors continue to have a significant and demonstrable connection to the place where they vote and that there are clear rules regarding where persons may register. An applicant's previous registration could include entry on any electoral register (i.e. not just a UK Parliamentary register) and applicants would be able to register in respect of an address that no longer exists.

163. To give effect to the franchise change some applicants - those who were last registered more than 15 years ago, or who have never been registered - will have their connection to a UK address verified by certain forms of documentary evidence, by EROs checking local records, or, if neither of these options is possible, via an attestation from an eligible attestor.

164. EROs should start to retain registers for more than 15 years, meaning that, over time, an increasing proportion of applicants would have their eligibility determined by a register check. In addition, once a person has registered as an overseas elector, even if they subsequently fall off the register, there will be a record of their previous registration as an overseas elector that EROs can use to process a subsequent application.

Registration Changes: Identity Verification

165. Improvements to the existing identity verification process are intended to increase existing security features and ensure that the application process is accessible to eligible electors. Building on the current identity verification process for overseas electors, there will now be a third way an elector can verify their identity: through the provision of documentary evidence. The three forms of identity verification will be based on the following hierarchy:

- a. Date of birth and National Insurance Number (NINo);
- b. Documentary evidence of identity;

c. Attestation

166. Providing documentary evidence to verify identity will align the process more closely with the existing “exceptions process” for those domestic electors who are unable to register with a NINo.
167. Any applicant who cannot provide their NINo or documentary evidence must have their identity verified through attestation from another registered elector swearing that the applicant is who they say they are. The existing requirements for overseas electors’ attestations will apply, with the addition of the following requirements that will be made via secondary legislation:
- a. a requirement to provide the attestor’s registration address;
 - b. a requirement for the attestor to confirm they are aware of the criminal penalty associated with knowingly providing false information to an ERO;
 - c. placing a limit of two overseas applications which an elector can attest to within a given period;
 - d. extending the eligibility requirements for those who can provide an identity attestation to allow UK based registered electors to attest an identity attestation for an overseas elector (currently only other overseas electors can provide an identity attestation for an overseas applicant).

Registration Changes: Renewals

168. Currently overseas electors must renew their registration every 12 months. A large proportion of overseas electors fail to do so, meaning that many fall off the register and reapply in the run up to elections. This affects the completeness and accuracy of electoral registers, results in electoral administrators receiving large numbers of applications during busy electoral periods and reduces electors’ chances of meeting the deadlines to register and cast their ballot. Late registration, for example, can pose challenges for persons who choose to vote by postal ballot and live further away from the UK, or in a part of the world where the postal service is less reliable, given the time required for ballots to be printed, sent and returned.
169. To help ensure that overseas electors remain on the register and mitigate the issues above, the registration period will be extended from 12 months to a maximum of three years. This will be accompanied by a fixed point renewal cycle to the effect that all overseas electors’ declarations will expire on the third 1st November after they are made. This should help administrators better manage their workflows, support the completeness and accuracy of the revised register published annually on 1 December and assist in encouraging overseas electors to renew and remain registered between elections as it could be supported by a communications campaign.
170. The changes will also better enable overseas electors to keep their absent vote arrangements up-to-date between elections. EROs will be able to combine the renewal of an overseas elector’s declaration with the renewal of an overseas elector’s absent vote arrangements. This will reduce EROs’ workloads during busy election periods, and ensure that overseas

Overseas Electors Electoral Registration and Electoral Costs: Registration, Renewals and Deletion Unit Costs

171. The registration, renewals and deletion unit costs were informed by an evidence gathering survey the Cabinet Office issued to LAs in 2020 to understand the costs of administering overseas elector electoral registration and elections. 199 LAs inputted into the evidence gathering, providing information on staff time estimates for time taken to complete the various processes in registering and renewal an overseas elector and the the type and average number of letters were sent to applicants and overseas electors throughout the registration and renewals processes.

172. Table 9 shows the individual costs of all of the lower level activities involved with registering, renewing and deletion from the register of an overseas elector. For each activity a cost has been calculated for:

- a. Staff time: from the average response time in the survey multiplied by a unit staff time cost of £0.30 per minute.
- b. Correspondence: from the average cost of Royal Mail International delivery and printing and postage, which has been weighted by the primary method of contact.

173. Unit costs count for the format of communication of correspondence between overseas electors and LAs based on 2019 IER Digital Service data on overseas elector communication methods:

- a. 8% of overseas electors submit paper applications while the remainder submit digital applications using the register to vote website; and
- b. The preferred primary contact method of 17% overseas electors was via letter with the remainder preferring digital communication such as email.

Table 9: Costs for registering, renewing and removing an overseas elector

Process	Staff Time (Min)	Staff Time (£)	Correspondence Cost (£)	Total Cost (£)
<i>Registration</i>				
Processing application: costs of processing an application to register to vote from overseas elector.	6.0	£ 1.81	£ -	£ 1.81
Requesting and processing attestations: costs of requesting and processing an attestation, this is assumed to be the same for identity and residency attestations.	8.8	£ 2.64	£ 0.43	£ 3.07
Checking previous registers: costs of checking digital and paper registers to determine if an overseas applicant has	47.8	£ 14.42	£ -	£ 14.42

been previously registered.				
Verifying an address: costs of using local data matching to verify the UK address of an overseas applicant.	7.9	£ 2.40	£ 0.43	£ 2.82
Verifying identity via documents: costs of requesting and processing documents to verify the identity of an elector.	6.4	£ 1.94	£ 0.43	£ 2.36
Adding a successful applicant to the register: costs of adding an individual elector to the register once the verification process is complete.	3.5	£ 1.06	£ 0.41	£ 1.47
Follow up correspondence: cost of additional postal correspondence sent to the overseas elector during the application process, this excludes attestation correspondence.	0.0	£ -	£ 3.01	£ 3.01
Encouraging Absent Voting: cost of asking overseas electors if they would like an absent vote and explaining the application process	7.0	£ 2.10	£ -	£ 2.10
Sending application forms for AV: cost of sending an absent voting application form	3.9	£ 1.17	£ 0.43	£ 1.60
Processing a proxy vote application: cost of processing a postal vote application.	9.0	£ 2.71	£ -	£ 2.71
Processing a postal vote application: cost of processing a proxy vote application.	5.5	£ 1.67	£ -	£ 1.67
<i>Renewal</i>				
Requesting and processing a renewal: cost of requesting a renewal and then processing it.	6.4	£ 1.94	£ 0.61	£ 2.55
<i>Deletion</i>				
Removing someone from the register: cost of removing an elector from the register.	3.1	£ 0.94	£ -	£ 0.94

174. Table 9 shows how these costs form the basis for the unit costs in our modelling. For registration the costs are adjusted to reflect the number of applicants who undertake the activity. For example, Table 9 shows the cost of requesting and processing an application to be £3.07 however not all overseas electors who submit an application will require an attestation. Table 10 accounts for this⁷⁴ to show the adjusted cost of attestation per applicant.

Table 10: Unit costs for registering, renewing and removing an overseas elector

Process	Unit Cost (£)	
	Option 0	Option 1/ Option 2
<i>Registration (cost per applicant)</i>		
Processing application	£ 1.81	£ 1.81
Requesting and processing attestations of identity	£ 0.26	£ 0.30
Checking previous registers	£ 13.67	£ 12.46
Verifying an address	-	£ 0.42
Verifying identity via documents	-	£ 0.34
Requesting and processing attestations of residency	-	£ 0.31
Adding successful applicant to the register	£ 1.27	£ 1.28
Follow up correspondence	£ 3.01	£ 3.01
Encouraging absent voting	£ 0.76	£ 0.77
Sending application forms for absent voting	£ 0.61	£ 0.61
Processing a proxy vote application	£ 0.88	£ 0.89
Processing a postal vote application	£ 0.92	£ 0.93
Total	£ 23.19	£ 23.14
<i>Successful Renewal (cost per renewal)</i>		
Requesting and processing a renewal	£ 2.55	£ 2.55
Total	£ 2.55	£ 2.55
<i>Unsuccessful Renewal (cost per renewal)</i>		

⁷⁴ Some processes in table 10 are not included in the policy options in Table 11, for example verifying an address is not required in the Option 0 workflow.

Requesting and processing a renewal	£ 2.55	£ 2.55
Removing someone from the register	£ 0.94	£ 0.94
Total	£ 3.48	£ 3.48
<i>Deletion (cost per renewal)</i>		
Removing someone from the register	£ 0.94	£ 0.94
Total	£ 0.94	£ 0.94

Overseas Electors Electoral Registration and Electoral Costs: Election Unit Costs

175. We have assumed it costs £5.29 for an overseas elector to vote in a UK parliamentary election. This voting unit cost was informed by the cost of the 2017 General Election in England and Wales. The voting unit cost is weighted by the proportions of absent votes: We have assumed that 61% of overseas electors will vote with a postal vote and the other 39% will vote via proxy.⁷⁵ It is assumed that the volumes of overseas electors who vote in person will be minimal due to them being based overseas. There are no changes to voting in the policy option.

Overseas Electors Electoral Registration and Electoral Costs: Final NPV

176. An example of the calculations for 2029/30 is shown in tables 11 and 12. For each Option the cost of each year is calculated from the volumes of overseas electors going through each process and the cost associated with it. Option 0 and Option 1/Option 2 have different volumes for the processes due to the change in franchise and the reduction in renewal frequency. The example year of 2029/30 has been selected as it is the first election year after the transition period to the 3 year renewal cycle.

Table 11: Cost Calculation for Option 0 in 2029/30

Process	Unit Cost (£)	Volumes	Costs (£)
Registering an overseas elector	£23.19	174,000	£ 4,000,000
Renewing an overseas elector's registration	£2.55	18,000	£ 50,000
Removing an overseas elector's registration following them failing to renew	£3.48	37,000	£ 100,000
Removing an overseas elector from the electoral register, due to them registering elsewhere	£0.94	4,000	£ 4,000
Voting	£5.29	169,000	£ 900,000

⁷⁵ Cabinet Office Local Authority Survey on overseas electors 2020

Total	-	-	£ 5,000,000
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Figures may not sum due to rounding

Table 12: Cost Calculation for Option 1/Option 2 in 2029/30

Process	Unit Cost (£)	Volumes	Costs (£)
Registering an overseas elector ⁷⁶	£23.14	302,000	£ 7,000,000
Renewing an overseas elector's registration	£2.55	32,000	£ 80,000
Removing an overseas elector's registration following them failing to renew	£3.48	65,000	£ 200,000
Removing an overseas elector from the electoral register, due to them registering elsewhere	£0.94	8,000	£ 8,000
Voting	£5.29	564,000	£ 3,000,000
Total	-	-	£ 10,000,000

Figures may not sum due to rounding

177. The additional electoral registration and electoral cost of the policy is calculated by the difference in costs of the counterfactual: Option 0 and Option 1/Option 2 in each of the 10 years in the appraisal period, then discounting from 21/22 prices.

178. The additional electoral registration and electoral costs of delivering the overseas electors policy changes are between **£8 and £25 million, with a central estimate of £15 million (21/22 prices, 10 year PV)⁷⁷**.

Electoral Commission Costs

179. The Commission will be responsible for public awareness activities to support newly enfranchised voters overseas in understanding their new right and taking action ahead of polling day. It will also be responsible for the provision of guidance and support to Electoral Registration Officers and Returning Officers as they prepare for and implement the change. The Commission regularly evaluates the impact of significant changes to the system of electoral registration and anticipates carrying out research and monitoring work around this extension to the franchise.

180. Detailed planning of work requirements will be undertaken in parallel with the passage of the Bill; cost estimates are therefore provided in outline, based on the

⁷⁶ The Bill includes changes to the registration process for overseas electors, to allow for the changes in registration criteria and improve the ease of registering for both overseas electors and electoral administrators. The survey covered both the new and existing registration processes and gave different implementation costs for each. The reduction of time taken to process an application from an overseas elector reduces the cost from £23.19 to £23.14 per application.

⁷⁷ See rounding rules at the start of section F.

Commission's current understanding of the proposed changes, and on learning from the implementation of other changes in the democratic process. **The estimated cost, including staffing, is between £1 million and £1.5 million over the ten-year appraisal period** ⁷⁸.

Voter identification & Absent Voting Costs

181. While overseas electors could apply for free Voter Cards, for the purpose of our analysis it is assumed they will not as the majority of overseas electors use absent voting to cast their ballot and therefore will not require identification to vote in person. For the small number of overseas electors who do travel to the UK to vote in person our analysis assumes these overseas electors will hold a passport⁷⁹ and therefore will not require a Voter Card.

182. The move to a three year registration renewals cycle for overseas electors has been designed to align with the absent voting renewals cycle so the absent voting reminders can be included with registration renewals therefore not incurring any additional costs for overseas electors other than those captured in the overseas elector electoral registration and electoral costs section⁸⁰.

F.5.2.2 Indirect costs

183. There are no monetisable indirect costs of overseas electors.

F.5.2.3 Direct benefits

Overseas Elector Electoral Registration and Electoral Benefits

184. As part of the changes to the overseas elector registration process the renewal cycle frequency will move from the current annual system to a 3 year cycle. This change will reduce the volumes of renewals issued by LAs and returned by overseas electors. The associated monetised benefits of this change have been accounted for in the Electoral Registration and Electoral Costs section where costs are presented net of any benefits.

185. Changes are required to the registration process to allow overseas electors to register in line with new guidelines, including residency checks and the option to provide documentary evidence to verify the identity of overseas electors after they submit an application to register to vote. These changes will also streamline the registration process and are expected to realise benefits within LAs. The associated monetised benefits of these changes have been accounted for in the Electoral Registration and Electoral Costs section where costs are presented net of any benefits.

⁷⁸ This is based on an estimate provided by the Electoral Commission, and it has therefore not been inflated or discounted.

⁷⁹ For those who use passports as a form of identification, the requirement is currently for a passport issued by a Commonwealth country or a country within the European Economic Area, however it should be noted only British citizens will be eligible to be overseas electors..

⁸⁰ However, this does not apply to Northern Ireland who are keeping a 5 year postal voting renewal cycle.

F.5.2.4 Indirect benefits

186. There are no monetised indirect benefits from implementing the overseas elector policy changes.

F.5.2.5 Summary - BNPV, NPSV, EANDCB

187. The total costs and benefits of overseas electors is shown in table 13 for the central, low and high scenarios. Benefits are not separately itemised in the table, instead they have been quantified and have been included within the cost lines. Therefore the Electoral Registration and Electoral costs are presented as net benefits.

188. Under the central assumptions, the estimated total Net Present Social Value for overseas electors for Option 1 and Option 2 is around **-£15 million (21/22 prices, 10-year PV) over the 10-year appraisal period⁸¹**.

Table 13: Summary of monetised impacts for overseas electors (£m, 2021 - 2031)

Impact	Low	Central	High
<i>Benefits</i>			
Total benefits	-	-	-
<i>Costs</i>			
Training costs	0.1	0.3	0.4
Electoral Registration and Electoral Costs	8	15	25
Electoral Commission costs	1	1	2
Total costs	8	15	25
Net Present Social Value	-8	-15	-25

Figures may not sum due to rounding

189. As there is inherent uncertainty with modelling uptake in overseas electors, analysis has been conducted to estimate the upper and lower bound of the uptake. This is estimated to be +/- 50% of the central scenario. Under the low scenario, there is an **estimated NPSV**

⁸¹ See rounding rules at the start of section F.

of -£8 million (10-year PV, 2021/22 prices). Similarly, under the high scenario, there is an **estimated NPSV of -£25 million (10-year PV, 2021/22 prices)**⁸².

190. Further sensitivity analysis has been conducted in section H to demonstrate the full range of impacts. These show the change in outputs when the estimated uptake for the overseas electors assumption is varied.

191. The **Business Net Present Value is expected to be £0**, as there are no direct costs or benefits to business which fall under the scope of BNPV, it is not proportionate to quantify the increased profit to businesses from the increase in postage and production as there is no available evidence.

192. **The Equivalent Annual Net Direct Cost to Business (EANDCB) is £0**, as the only costs that involve businesses are the additional income they will receive from an increase in postage and production, but as this takes place via LAs this is deemed to be indirect.

F.5.3 Non-monetised impacts

F.5.3.1 Direct costs

Implementation Costs: Digital Costs

193. Changes will need to be made to the existing Register to Vote digital service run by the Cabinet Office to enable electors to successfully register under the new policy, and to the specialist electoral management software (EMS) used by LA electoral services teams to build the workflows and data capture processes to enable them to successfully register the newly enfranchised electors. The full digital specifications and cost estimates will be developed as a part of future overseas electors service design post primary legislation.

Cabinet Office Communications Costs

194. The EC has a legal duty to make eligible potential electors aware of their rights and to promote democratic engagement. The Cabinet Office, however, will support this work, and use UK Government communication channels accordingly.

UK Parliamentary Elections Costs

195. During campaigning ahead of a UK Parliamentary Election political candidates are entitled to send each registered elector one communication via the Universal Service Provider (Royal Mail) with the postage cost paid out of the Consolidated Fund. While the current legislation allows for candidates to issue mailings abroad to overseas electors, in recent elections no candidate has attempted to do so. Therefore this cost has not been monetised, as it has been assumed that candidates will continue not to send candidate mailings to overseas electors in future elections.

⁸² See rounding rules at the start of section F.

F.5.3.2 Indirect costs

Costs to the justice system of voter registration fraud

196. The Representation of the People Acts have sections⁸³ containing offences which newly enfranchised overseas electors could commit while registering to vote. There have been no convictions for these offences in the last 3 years for both domestic and overseas electors⁸⁴. Therefore it is expected that the costs of legal aid and bringing criminal prosecutions would be minimal as there is no evidence to suggest the rates would increase.

Costs to the electorate

197. If a newly enfranchised British citizen living abroad wishes to register to vote then there is a time cost associated with the application process. This cost has not been monetised as it is a personal choice for a citizen to determine if the benefits of voting in a UK parliamentary election are greater than the time it will take them to register to vote.

F.5.3.3 Direct benefits

Enabling participation from overseas electors

198. Through the implementation of this policy an estimated 2.3m British Citizens living abroad in 2023 will be newly enfranchised and able to participate in UK Parliamentary elections. There will be many secondary benefits from the expected increase in engagement and participation, including strengthening ties around the world with the expatriate community. However none of these benefits can be monetised.

199. The Green Book defines UK society to cover UK residents and not potential residents or visitors but that it is sometimes reasonable to include the costs and benefits for people living outside the UK. This policy impacts on eligible British citizens living overseas by giving them the right to register and vote in UK parliamentary elections. Therefore we have adopted the position that while overseas electors are not UK residents the cost and benefits considered within this IA do directly impact UK society.

Improvements to the registration process

200. The policy will implement improvements to current digital registration services used by overseas electors to register and renew and digitise analogue processes. These changes will modernise current overseas elector registration systems in meeting the 2019 votes for life Government manifesto commitment to make it easier for overseas electors to vote. As a result of an improved overseas elector registration journey it is expected LAs will realise further benefits. At this early stage of digital development these benefits have not been quantified.

⁸³ Section 13D RPA 1983 and section 12(1) or (2) of the RPA 1985

⁸⁴ [Electoral Commission](#): Electoral fraud data - further breakdown of this data was provided by the EC.

F.5.3.4 Indirect benefits

Increased use of postage and printing businesses

201. There is a cost for LAs (in the monetised indirect costs section) of additional correspondence being sent to overseas electors as the total franchise increases. This cost passes on a benefit to the printing and postage firms contracted by the LAs for the production of this correspondence, as they will increase the value of the contracts. This has not been quantified as the increase in profit for these businesses is not known.

F.6 Campaigning Measures

F.6.1 Methodology

202. The only component of Campaigning Measures which is monetisable is digital imprints, and this has been quantified in section F.5.2 below. This is because there is currently limited available quantitative evidence on how campaigners, the EC and other stakeholders affected by, or responsible for implementing, Campaigning Measures will respond. Therefore it is difficult to accurately quantify the impact of this policy. In the absence of this quantitative analysis, qualitative analysis has been produced to address this issue.

F.6.2 Monetised impacts

F.6.2.1 Direct costs

Digital imprints: Familiarisation costs for those producing digital content

203. The digital imprints regime creates a new offence for those who are required to put an imprint on eligible digital campaigning material and fail to do so. Creating a new offence means that there will be some familiarisation costs for political parties, holders of elected office, candidates and future candidates, registered third party campaigners, registered referendum campaigners and anyone else wishing to promote digital campaigning material in scope of the legislation.

204. Those wishing to promote digital campaigning material in scope of the legislation will have to read, understand and comply with the new legislation (using the statutory guidance). We assume that familiarisation costs are one-off, up-front costs that are borne by political parties, holders of elected office, candidates and future candidates, registered third party campaigners, registered referendum campaigners and anyone else wishing to promote digital campaigning material in scope of the legislation.

205. To monetise this cost, the guidance produced for the 2021 Scottish Parliament elections was used as a proxy⁸⁵. However, it is worth noting that the Scottish regime is

⁸⁵ Scottish Government guidance on digital imprints for the May 2021 elections can be found [here](#).

different from the regime proposed in this Bill, and therefore the length of the guidance is likely to differ too. The cost was calculated by finding the number of words in the guidance, assumed at 1844 as this is the number of words in the Scottish Government guidance, and dividing by the average reading speed (200 words per minute) to give the time taken to read the guidance, taken from ReadingSoft⁸⁶. This time was then multiplied by the median UK wage (per minute) taken from the Annual Survey of Households and Earnings, and the number of people reading the guidance. It is assumed that all candidates for General Elections and one person from each LA area, political party and third party campaign group will read the guidance⁸⁷.

206. The Bill is not expected to receive Royal Assent until 2022 and the first elections following the introduction of digital imprints are likely to be the 2023 local elections. Costs will be borne in the financial year 2022/23 and are assumed to be one off. Total familiarisation costs for those in scope of the regime are between **£0 and £0.1 million, with a central estimate of less than £0.1 million (21/22 prices, 10 year PV)**⁸⁸.

Digital imprints: Cost to EC of their regulatory function

207. The EC will be responsible for enforcing the digital imprints regime for digital campaigning material in support of (or undermining) political parties and referendum campaigners, as well as providing advice and undertaking other regulatory activities. The police will be responsible for digital campaigning material in support of (or undermining) candidates, future candidates and holders of elected office. Following a conviction for an offence under the new DI regime, the court may issue the online service providers (that host user generated content) with a notice to take down the infringing material or disable access to the material. The EC may also issue a notice to take down or disable access to material they have found to be in breach of the rules.

208. The EC were asked for estimates of the costs of their regulatory function, and they provided an approximate estimate informed by the current costs of the imprint regime for printed material. Costs are based on the expected cycle of electoral events over the next ten years which is subject to change. Estimates are approximate because the printed imprint offences are a small proportion within the range of offences relating to the regime for spending, donations, loans and accounts that the EC is responsible for.

209. The EC provided an approximate estimate of the costs to the EC of continuing to: regulate the printed imprint rules in s143 PPERA 2000 on election material promoting electoral success of a party, parties or group of candidates; and support the police with their enforcement responsibilities relating to printed imprint rules in the RPA 1983 and other equivalent legislation on election material promoting electoral success of a candidate. Costs provided also include the cost of producing guidance and giving advice to candidates. These costs have been used to inform estimates used in this Impact Assessment.

⁸⁶ Average reading speed on a screen is taken from [Readingsoft](#).

⁸⁷ It is assumed that one person from each local district etc. reads the guidance, rather than the number of candidates for each local district etc., as there is no data on the number of people contesting each local district etc.

⁸⁸ See rounding rules at the start of section F.

210. The costs are based on extrapolating from the EC’s overall budget for regulatory work over five years. They do not record the staff time spent on particular functions or kinds of offences so they have estimated the amount that would be spent on work relating to the existing printed imprints regime.

211. The estimates for producing campaigner guidance and supporting the police are fairly constant across the election cycle. The estimates for advice to campaigners, monitoring and interventions, and enforcement are higher in years with PPERA elections (and preparatory or follow-up work could happen in years either side of the actual election).

212. Similarly, the EC only provided costs up to 2024/25, therefore the average of the previous costs was used to calculate the costs going forwards. The costs of enforcement to the police cannot be monetised and are set out in section F.5.3.1. The total cost to the EC of their regulatory functions **is estimated to be between £0 million and £2 million, with a central estimate of £0.8 million over the ten year appraisal period (21/22 prices, 10 year PV)⁸⁹**. Some of the costs may be higher during the initial years of the new requirement as it beds in.

F.6.2.2 Indirect costs

213. There are no monetised indirect costs resulting from the Campaigning Measures.

F.6.2.3 Direct benefits

214. There are no monetised direct benefits resulting from the Campaigning Measures.

F.6.2.4 Indirect benefits

215. There are no monetised indirect benefits resulting from the Campaigning Measures.

F.6.2.5 Summary - BNPV, NPSV, EANDCB

216. Under the central assumptions, the estimated total quantified benefits and costs are £0 million and £0.8 million respectively, which provides a Net Present Social Value for Campaigning Measures of around **£0.8 million (21/22 prices, 10-year PV) over the 10-year appraisal period⁹⁰**.

Table 14: Summary of monetised impacts for Campaigning Measures (£m, 2021 - 2031)

Impact	Low	Central	High
<i>Benefits</i>			

⁸⁹ See rounding rules at the start of section F.

⁹⁰ See rounding rules at the start of section F.

Total benefits	-	-	-
<i>Costs</i>			
Familiarisation costs	0	0.1	0.1
Cost to the EC of their regulatory functions	0	0.8	2
Total costs	0	0.8	2
Net Present Social Value	0	-0.8	-2

Figures may not sum due to rounding

217. As there is inherent uncertainty with modelling uptake in Campaigning Measures, analysis has been conducted to estimate the upper and lower bound of the uptake. This is estimated to be +/- 50% of the central scenario. Under the low scenario, there is an **estimated NPSV of £0 million (10-year PV, 2021/22 prices)**. Similarly, under the high scenario, there is an **estimated NPSV of -£2 million (10-year PV, 2021/22 prices)**⁹¹.

F.6.3 Non-monetised impacts

F.6.3.1 Direct costs

Digital Imprints

Cost of creating imprints

218. Campaigners putting an imprint on digital campaigning material may face a cost in creating the imprint. However, this will likely be a one-off and very small cost, as once an imprint is created, it can be used across multiple pieces of digital campaigning material and digital platforms. Similarly, we expect this cost to be minimal, and marginal compared to the total cost of creating digital campaigning material, as the imprint is only a piece of text requiring the details of the promoter and who they are promoting the content on behalf of. It is also likely that the imprint used on print material will be adapted and used for digital campaigning materials, further reducing the cost.

219. This cost has not been monetised as there is no data on how much this is expected to cost, and it is expected that any costs involved with creating an imprint will be minimal, therefore collecting the data would not be proportional. Similarly, it is difficult to estimate how many imprints will be needed.

Increased monitoring and enforcement costs for the police

⁹¹ See rounding rules at the start of section F.

220. The police are responsible for enforcing the regime in respect of digital campaigning material in support of holders of elected office, candidates and future candidates. Table 15 below estimates the number of digital imprint breaches per year, using the current print regime as a proxy. Using the current print regime as a proxy⁹², it is estimated that there will be 50 allegations of criminal breaches of digital imprint legislation in non-General Election years, and 139 in General Election years, reported to the police. Separate averages are constructed as there is likely to be more digital campaigning material in General Election years, than in years with smaller electoral events.

221. However, these estimates are likely to be conservative, with more digital imprint allegations than print related allegations. This is because there is more digital content than printed content, the new digital regime covers groups not included under the print legislation, the digital regime includes campaigning material all year round, rather than just election material, and spending on digital campaigns is growing year on year. However, it is difficult to estimate how many more offences there will be under the digital regime as there is a lack of data surrounding the scale of digital campaigning material, and how this may change in the future.

222. Data and estimates only include allegations/investigations/sanctions relating to election material and do not include wider campaigning material. Criminal figures are based on 568 allegations reported to the police and 2 court proceedings over a 6 year period⁹³. The estimates in table 15 represent the current average number of criminal allegations and proceedings initiated per year rounded up, with separate averages for years with a General Election.

223. However, this cost has not been monetised as there is no data relating to how much the police will spend on enforcement. Moreover, there is little data on how much digital campaigning material there will be in future years, compared to print material, and how much of this is likely to breach legislation, making it difficult to estimate the total impacts on the police. Any estimates would not be robust given the data gaps.

Table 15: Estimated number of candidate related allegations (and court proceedings initiated), using the current print regime as a proxy, 2021 - 2031.

Year	Number of candidate related allegations (court proceedings initiated by the police)
2021/22	50 (1)
2022/23	50 (1)
2023/24	50 (1)
2024/25	139 (1)

⁹² Data provided to Cabinet Office from the EC.

⁹³ Electoral Commission data provided to the Cabinet Office.

2025/26	50 (1)
2026/27	50 (1)
2027/28	50 (1)
2028/29	50 (1)
2029/30	139 (1)
2030/31	50 (1)
Total	678 (10)

Note: Figures above for court proceedings initiated are all less than 1 so we have rounded up to be conservative. Figures outside of brackets in the first column shows the estimated number of candidate related allegations, with the number of court proceedings initiated in brackets.

Notional Expenditure

Additional cost of updating guidance

224. The primary cost associated with the clarification of this measure is the cost to the EC for updating their guidance for the wider stakeholders affected by this policy. However, data on the cost of amending this guidance is limited and therefore it is difficult to accurately quantify this cost.

Political Finance: third-party campaigner registration and restriction of third-party campaigning to UK-based sources

Cost to the EC of their regulatory function

225. Restricting all third-party campaigning to UK-based entities and eligible overseas voters and introducing a second, lower tier of registered third-parties could potentially increase the regulatory functions costs for the EC, which includes registering and advising campaigners. According to the Commission, there were 11 third-party offences since April 2018⁹⁴, which represents around 5% of third-parties that have been registered in that time.

226. There is limited available evidence on the number of possible third-party campaigners who are not currently registered but will be impacted by this proposal. However, it is likely that the introduction of this policy will increase the EC's need for

⁹⁴ [Electoral Commission investigations](#)

monitoring capacity around electoral events. Nonetheless, it is difficult to accurately quantify this cost due to the limited available evidence.

227. The impact of this on the EC and justice system is expected to be low, as there have been low incidences of similar incidents and no relevant cases have had criminal proceedings. Overseas enforcement of rules against foreign spending is already required in respect of the existing third-party campaigner registration thresholds, although it does present a challenge.

Increased costs of policing and the wider criminal justice system

228. Existing offences concerned with incurring third-party expenditure when it is prohibited (e.g. spending more than the registration thresholds without being registered) can be resolved by either civil or criminal means. In practice, the EC generally resolves such offences themselves. However, any increase in these offences could increase the costs for the police, the wider justice system, where they are passed on by the EC. In practice the EC may find it more difficult to enforce the foreign spending restriction internationally as it is outside of their jurisdiction. However, it is difficult to quantify this proposed policy due to the limited available evidence on spending by foreign entities.

Increased administrative burden for 'lower-tier' third-party campaigners

229. Introducing a new 'lower tier' registration threshold will increase the number of third-party campaigners required to submit registrations to the EC. Although the lower tier will not subject campaigners to the same financial controls (meaning that they will not have to undertake donations or accounts reporting, for example) as the existing 'upper tier' does, it will require these campaigners to complete a notification form to register with the EC, part of which involves proving they are eligible to register.

Political Finance: asset declaration for the registration of new parties

Costs to the EC of their regulatory functions

230. As giving false information at registration is a criminal offence only, the EC will not be able to use its civil sanctioning powers to enforce this measure. However, they will be responsible for reviewing the applications of prospective political parties. On average, there have been around 112 party registration applications on average per year between 2016 - 2020⁹⁵.

231. Data on the cost to the EC of reviewing applications for political parties is limited, and therefore it is difficult to quantify. The EC are already required to review the assets and liabilities of a political party, as part of their annual accounts reporting. This will create an additional requirement for the EC to perform similar checks during the registration process as well.

⁹⁵ This is based on data provided by the EC.

Increased administration burden for campaigners and political parties

232. As political parties are not currently required to record their assets until they submit an annual statement of accounts, introduction of this measure will require them to compile or provide a record of this information pre-registration. However, this is information that a party would need to be recording as soon as they were registered and reported on within a number of months, under the current rules.

Political Finance: ban on registering as both a political party and a third-party campaigner and restrictions on coordinated spending

Communication costs

233. Introducing a ban on entities registering as both a political party and a third-party to prevent any attempts to bypass their spending limits is likely to create an increase in costs for the EC around advising campaigners, which generally takes place at each election. This generally includes working with campaigners to understand their plans and how the campaigning rules apply to their spending. However, this impact cannot be monetised as it is a new rule and it is therefore difficult to accurately quantify this impact.

Intimidation: new electoral sanction

234. The Government will create a new electoral sanction - a five-year ban on standing for, being elected to and holding elective office - which will be imposed in respect of existing intimidatory criminal offences on conviction. No new offence is being created, therefore, this will lead to very little additional burden on the police, prosecutors and courts, each of whom already investigate, prosecute and determine and sentence the underlying intimidatory criminal offence, even without the new electoral sanction.

235. Given that this policy will not create a new criminal offence, it is not expected that the number of offences passing through the justice system will increase. It is not possible to quantify the number of times this new electoral sanction will be imposed, as the data does not exist to show the number of intimidatory offences for which it was proven that the offender was motivated by hostility towards the victim because the victim was (or was presumed to be) a candidate, future candidate, campaigner or elected officeholder (a prerequisite for imposing the new electoral sanction). Nonetheless, the sanction is unlikely to be used excessively and therefore any additional costs will be negligible.

Undue influence

Increased monitoring and enforcement costs

236. Clarifying the law on undue influence will make it clear when the corrupt practice has occurred. This will make it easier to monitor and enforce through preventative action on the ground; there may be an increase in costs for the police, courts system and the prosecutors as a result, however the number of elections and/or LA areas where such enforcement would be required is low. Clearer legislation may also lead to more election

petitions challenging the election results as well as prosecutions and sanctions in regards to the more serious instances of undue influence as it will become easier to understand when the corrupt practice has occurred, increasing costs for the courts system and prosecutors.

237. Table 16 shows the estimated number of allegations, and how many led to further action, based on the average between 2012-2019⁹⁶. Currently, between 81%-86% of allegations lead to no further action, with only one one court case initiated in the last 8 years. However, it is not known how many of these allegations would have progressed further had the law been clearer, which would have made further action (such as criminal prosecutions) easier.

Table 16: Estimated number of undue influence allegations per year, estimated number of allegations resulting in further action

Year	Estimated number of Undue influence allegations	Number resulting in further action
2021/22	9	1
2022/23	9	1
2023/24	9	1
2024/25	18	3
2025/26	9	1
2026/27	9	1
2027/28	9	1
2028/29	9	1
2029/30	18	3
2030/31	9	1

238. These costs have not been monetised as there is no data on how much relevant bodies spend on monitoring and enforcement, relating to undue influence. Similarly, there is no data to indicate how many additional prosecutions there will be as we do not know how many allegations / election petitions would have led to further action, had the law been clearer at the time. Any estimates based on the current limited data would not be robust.

Electoral Commission Accountability

239. Under the reform proposed to the Electoral Commission's (EC) accountability to Parliament, the Government will make provision for the introduction of a Strategy and

⁹⁶ Data provided to Cabinet Office from the EC.

Policy Statement that will set guidance the EC must have regard to in the discharge of its functions. This will be updated at least once every five years but can be updated more often.

240. Producing the Strategy and Policy Statement will involve a cost, mainly relating to the time it takes to create the Statement, consulting with relevant stakeholders, and seeking parliamentary approval.
241. Whilst the Strategy and Policy Statement has to be updated at least once every five years, it is likely that it may be updated more often to reflect, for example, changes in electoral policy priorities, meaning it's exact frequency may vary. Similarly, the level of detail, and therefore length of the Statement may vary between each Strategy and Policy Statement, meaning that the time taken to produce the Statement will also vary. Therefore, this cost has not been monetised as there is no data to indicate how long it will take to produce the Statement, or how often it will be produced.
242. There will also be an additional cost to the Speaker's Committee on the Electoral Commission (SCEC) as it will now have to scrutinise and report on the EC's compliance with its duty to give regard to the guidance set out in the Strategy and Policy Statement. However, this cost has not been monetised as there is no data regarding how much additional resource the SCEC may require, or how much additional time will be spent on these activities.
243. There are no anticipated costs resulting from preventing the EC from bringing criminal prosecutions in England, Wales and Northern Ireland.

F.6.3.2 Indirect costs

Digital Imprints

Cost to social media platforms of removing material in breach of imprint legislation

244. Social media platforms and other online platforms will not be responsible for monitoring content and ensuring users follow the rules on digital imprints. However, they will be responsible for removing any material in breach of this legislation once it is brought to their attention by the courts (or the EC) in the form of a take down notice.
245. Table 15, above, estimates the number of digital imprint breaches per year, using the current print regime as a proxy. It is estimated that there will be 50 allegations of breaches of digital imprint legislation in non-General Election years, and 139 in General Election years.
246. Removing this digital content may incur a cost to the hosting platform, as resources will be required to find the content in question and remove it from circulation. However, this cost has not been monetised as there is no data regarding how much it costs to remove content from digital platforms.

247. Some larger social media platforms were contacted and they stated that they do not collect data on the cost to remove individual pieces of content, but have suggested that costs may vary depending on the type of platform and whether removal is automated or manual. However, social media companies remove thousands of items of content per day, so it is anticipated that any additional requests to remove content in breach of digital imprints legislation will not create large burdens on platforms as this infrastructure is in place.

Fines for breaches of legislation

248. Under the current print regime if a campaigner is found to breach the imprint laws, they can be subject to a fine. For material in support of candidates on summary conviction the maximum associated fine is unlimited in England and Wales. In Scotland and Northern Ireland, on summary conviction the fine would not exceed level 5 on the standard scale. For material in support of registered political parties and referendums, campaigners the EC can currently impose a fine of a maximum amount of £20,000 per offence. However, they can refer the matter to the police in which case on summary conviction the maximum associated fine is unlimited in England and Wales. In Scotland and Northern Ireland, on summary conviction the fine would not exceed level 5 on the standard scale. There is no evidence to suggest that fines for breaking digital imprint rules will be larger than those imposed for breaking the printed imprint rules.

249. This cost has not been monetised due to a lack of data. Given that the potential fine for a criminal offence is unlimited, the actual value of fines that may be issued is unknown. Similarly, of the 568 criminal investigations from 2012-2019, only two resulted in court cases which represented 0.4% of cases, with most being resolved locally by the police. On the civil sanctioning side, enforced by the EC, of 11 investigations over 5 years only 8 resulted in civil sanctions being imposed.

250. Very few print offences result in fines, and it is expected that this will also be true for digital imprints. Whilst there is an estimate for the number of potential cases, this is likely to be an underestimate. There is a lack of data on how many fines will be issued, and how much for, so this cost has not been monetised as any estimate would not be robust.

Notional Expenditure

251. There are estimated to be no indirect costs associated with this measure.

Political Finance: third-party campaigner registration and restrictions of third-party campaigners to UK-based sources

Increased staffing costs

252. Any increase of third-party registrations due to the introduction of the second, 'lower' tier and the restriction of foreign third-party campaigning, may also mean that the EC needs more staff to deal with the extra demand. However, there is limited data on how many

additional staff may be required as a result of this policy, and thus it has not been quantified.

Potential increase in fine costs for campaigners

253. The introduction of this lower tier could increase fine costs for campaigners if the number of offences increase, however data on this is limited. The levels of fines can vary, but the penalty cap for civil sanctions ranges from between £5,000 and £20,000 for some offences relating to third-party campaigner registration⁹⁷.

Political Finance: asset declaration for the registration of new parties

Increased costs to the criminal justice system

254. The costs to Her Majesty's Courts and Tribunal Services (HMCTS) may increase as there could be a greater number of cases going through the criminal justice system as a result of this policy change, as the associated offence concerned with false information given at registration is a criminal offence only. However, given that the potential pool of offenders is quite small, combined with the current number of cases related to registration being low, this suggests that the impact is likely to be small.

Reduction in registration fee income for the EC

255. Political parties are required to pay a fee of £150 to the EC to register, and they retain this fee income.⁹⁸ Therefore, if this proposed measure has a deterrent effect on potential political parties, this could lead to a small reduction in registration fee income for the EC.

Potential increase in fine costs for new political parties

256. If new political parties fail to declare their assets and liabilities while registering with the EC, then they will be required to pay a fine. Data on the average cost of fines are limited and this impact cannot be quantified due to a lack of available evidence⁹⁹.

Political Finance: ban on registering as both a political party and a third-party campaigner and restrictions on coordinated spending

257. There are estimated to be no indirect costs associated with this measure.

Intimidation: new electoral sanction

258. There are no expected indirect costs relating to the new electoral sanction against political intimidation. This is because the proposed change adds a new sanction to existing offences, once someone is convicted, rather than introducing a new offence.

⁹⁷ [As demonstrated under the Political Parties Elections and Referendums Act 2000, Schedule 19C](#)

⁹⁸ [Electoral Commission: Introduction to registering a party](#)

⁹⁹ [Political Parties Elections and Referendums Act 2000, Schedule 20 'Offences', s.39 \(false statements\)](#)

259. The new sanction is unlikely to increase the number of offences, nor the prosecution rate of the existing offences, meaning no additional indirect cost burdens are created.

Undue influence

260. There are no expected indirect costs from clarifying the law surrounding undue influence. This corrupt practice is already monitored, enforced and prosecuted. The prosecution rate may increase as a result of clarification, as in section F.5.3.1.

Electoral Commission Accountability

Cost to the EC to respond to additional scrutiny

261. There will be an indirect cost on the Electoral Commission (EC) as the Speaker's Committee on the Electoral Commission (SCEC) will now have powers to commission evidence from the EC to support its scrutiny function and the EC will have to add to their existing reporting obligations specific mention of due regard given to the Strategy and Policy Statement. This cost has not been monetised as there is no data relating to how much evidence the SCEC will request from the EC, or how much resource this will involve.

Additional cost to the SCEC from additional powers

262. There will also be an indirect cost on the SCEC as it will have increased remit and powers to scrutinise the EC's compliance with its duty to give regard to the Strategy and Policy Statement. Commissioning evidence from the EC and reporting on its findings will add to the workload of the SCEC, and may require extra resources or resources being diverted away from other work. However, this cost has not been monetised as there is no data relating to how much additional work this would create for the SCEC and how much additional resource, if any, may be required.

263. There are no other expected indirect costs from the proposed changes to the EC's structures of accountability. Increased accountability to Parliament through the introduction of a Strategy and Policy Statement, and preventing the EC from bringing criminal prosecutions in England, Wales and Northern Ireland (which they currently do not do, but are likely to have powers to do) will only have direct effects on the EC themselves.

F.6.3.3 Direct benefits

Digital imprints

Increased transparency

264. The primary benefit of the new digital imprints regime is to provide increased transparency for voters with regards to digital campaigning material. Digital campaigning is growing, yet digital material is not subject to the same rules as printed campaigning

material. The EC's report on the 2019 General Election¹⁰⁰ found that 72% of people agreed that it was important for them to know who produced the political information they see online. Less than a third (29%) agreed that they can find out who has produced the political information they see online and nearly half (46%) agreed that they were concerned about why and how political ads were targeted at them.

265. The new legislation will go some way towards addressing these concerns by enabling voters to identify who has promoted digital campaign material and on whose behalf, in the same way that they can with printed material. This will enable voters to make more informed choices, increasing the integrity of our electoral system and ensuring transparency over campaigning material regardless of the medium of communication.

Better enforcement of election spending limits

266. Digital imprints will also allow the EC and police to better enforce the spending rules as it will provide more information on the advertising spend of candidates, political parties, registered third party campaigners and referendum campaigners. The EC have said that this will help them identify who may need to register and submit a spending return after an election or referendum.

Notional Expenditure

Clearer understanding of the law

267. Providing clarity around this legislation will lead to a greater understanding for all candidates, their agents, political parties and other campaigners. This will ensure that the candidates and their agents will have more confidence that they are not subject to a legal risk that they cannot control.

Political Finance: third-party campaigner registration and restrictions of third-party campaigners to UK-based sources

Improved transparency and integrity of campaigning process

268. The introduction of a new, lower tier for third-party campaigners will help improve the transparency of the campaigning process as more third party campaigners will be required to register, thus increasing our understanding of the campaign landscape. Restricting spending by foreign third-party campaigners will also ensure that foreign spending in UK elections is limited to permissible sources.

Political Finance: asset declaration for the registration of new parties

Increased transparency and public scrutiny of finances for new political parties

¹⁰⁰ [Electoral Commission report on the 2019 General Election](#)

269. Requiring new political parties to declare their assets and liabilities prior to registering with the EC will increase the transparency and scrutiny of their finances by ensuring that this information is in the public domain earlier.

Political Finance: ban on registering as both a political party and a third-party campaigner and restrictions on coordinated spending

Improved fairness in campaigning expenditure

270. Campaigners are currently allowed to register both as a political party and as a third-party campaigner, and therefore have separate spending limits for both. This means that they can spend more than those campaigners who just have one registration. The ban on dual registration will improve fairness in campaign expenditure, as all third-party campaigners will be subjected to the same spending limits and restrictions. The restriction on coordinated spending between political parties and third-party campaigners will ensure they cannot expand their spending limits by working together.

Intimidation: new electoral sanction

Less intimidation

271. The Committee on Standards in Public Life concluded that “*intimidatory behaviour is already affecting the way in which MPs are relating to their constituents, has put off candidates who want to serve their communities from standing for public offices, and threatens to damage the vibrancy and diversity of our public life.*” A new electoral sanction for those convicted of intimidatory criminal offences will act as a deterrent, reducing the incidence of intimidation. This will contribute to candidates, future candidates, campaigners and elected officeholders feeling safer and being able to more effectively participate in elections and the political debate without fear of intimidation.

272. Anecdotal evidence from the CSPL’s review also suggests that some MPs have installed panic buttons, some have stopped going to public engagements and some no longer hold open surgeries, making them less accessible¹⁰¹. Reduced intimidation will allow those in public life to better carry out their duties and more effectively represent their communities.

Undue influence

Reduced undue influence on electors

273. The new legislation aims to reduce the incidence of elector intimidation. The new legislation will clarify what is classed as undue influence, which aims to make instances of this corrupt practice easier to take action against or prosecute and will likely deter people from seeking to unduly influence electors. This contributes to the integrity of elections, and

¹⁰¹ [CSPL](#)

polling stations, by encouraging turnout and allowing electors to freely choose who they want to vote for, rather than being pressured to vote a certain way.

Electoral Commission Accountability

Increased accountability for the EC

274. The Strategy and Policy Statement approved by Parliament will set out guidance the Electoral Commission (EC) will be bound by law to give regard to when discharging its functions. This will make the EC more accountable to Parliament, ensuring that the EC is delivering a high quality public service and is upholding electoral integrity.

275. Similarly, increased functions for the Speaker's Committee on the Electoral Commission (SCEC) will further increase the EC's accountability to Parliament as the Committee will have the power to examine the EC's compliance with its duty to give regard to the Strategy and Policy Statement. The ability of the SCEC to report on the EC's performance against this duty will help ensure that the EC is meeting its obligations and is an effective use of taxpayer resources.

F.6.3.4 Indirect benefits

Digital Imprints

Fine revenue for the Government

276. Under the current print regime if a campaigner is found to breach the imprint laws, they can be subject to a fine. For material in support of candidates on summary conviction the maximum associated fine is unlimited in England and Wales. In Scotland and Northern Ireland, on summary conviction the fine would not exceed level 5 on the standard scale. For material in support of registered political parties and referendums, the EC can currently impose a fine of a maximum amount of £20,000 per offence. However, they can refer the matter to the police in which case on summary conviction the maximum associated fine is unlimited in England and Wales. In Scotland and Northern Ireland, on summary conviction the fine would not exceed level 5 on the standard scale.

277. Fines are paid directly to the UK Government's Consolidated Fund, and this can be used to fund public services, creating an indirect benefit. However, this is a transfer and therefore has been excluded from the overall NPSV. Given that the potential fine for an offence is unlimited for criminal offences, the actual value of fines that may be issued is unknown. However, they are generally in the range of £200 - £4,000¹⁰². Similarly, of the 568 criminal allegations from 2012-2019, only two resulted in court cases which represented 0.4% of cases, with most being locally resolved by the police. Of 11 investigations conducted by the EC over 5 years, 8 resulted in civil sanctions being imposed, suggesting that fines are rarely issued for imprint offences.

¹⁰² Data provided by the EC.

278. Very few print offences result in fines, and it is expected that this will also be true for digital imprints. Whilst there is an estimate for the number of potential cases, this is likely to be an underestimate. There is a lack of data on how many fines will be issued, and how much for, so this benefit has not been monetised as any estimate would not be robust.

Notional Expenditure

279. There are no indirect benefits as a result of this policy.

Political Finance: third-party campaigner registration and restrictions of third-party campaigners to UK-based sources

Increased fine income for Government

280. Any increase in offences committed by third party campaigners could also lead to an increase in fine income for the UK Government's consolidated fund. The EC has two different fine caps, with £5,000 for offences which are summary only or prescribed contravention and £20,000 for other offences (such as exceeding limits on controlled expenditure). All fines are based on an individual case-by-case basis, and therefore it is difficult to accurately quantify the potential increase in income for the UK government if the number of offences increase. As with digital imprints, all of the fine income will go directly to the Consolidated Fund.

Political Finance: asset declaration for the registration of new parties

Increased fine income for the Government

281. Failure to appropriately declare assets and liabilities for potential political parties could lead to an increase in offences, and the subsequent increase in fine income. However, there is no fine cap for this type of offence therefore makes it difficult to quantify the impact of this policy proposal. Furthermore, as there is unlikely to be an increase in the number of offences for this measure, any increase in fine income is likely to be negligible.

Political Finance: banning registering as a third party and political party and restrictions on coordinated spending

282. There are no indirect benefits as a result of this policy.

Intimidation: new electoral sanction

Broader political representation and better political debate

283. According to a survey conducted by the UK Parliament's Womens and Equalities Committee, two-thirds of women MPs felt abuse against women in politics impacted their willingness to stand for re-election¹⁰³. Amnesty International have found that '*there is a*

¹⁰³ Parliamentary survey, November 2019

*danger that high levels of abuse against women MPs will have a chilling effect on women taking part in public life - especially women of colour*¹⁰⁴. Additional protection from this abuse and intimidation - and a greater deterrent against them - may encourage more people, particularly women and those from minority backgrounds, to stand for election. Broader political representation encourages the exchange of different views, opinions and ideas, which can lead to better decision-making¹⁰⁵.

284. The new electoral sanction is also intended to make campaigners feel more empowered to voice their opinions, rather than censoring themselves for fear of intimidation and abuse. A more wide-ranging political debate will enable voters to make more informed choices because they will have a better understanding of the candidates' positions and opinions.

Improved mental health

285. Amnesty International have said '*Abuse on social media bears a huge psychological impact and has a chilling effect on their [MPs] right to enjoy freedom of expression online, and exercising their right to equal participation in public and political life...*' UNESCO has also found that '*...online harassment ... has a serious psychological impact that may result in self-censorship*¹⁰⁶. From this, it can be inferred that reduced online intimidation and abuse could lead to improved mental health.

Undue influence

Better political participation

286. Lower incidence of undue influence and intimidation of electors may increase turnout, as people are likely to feel more comfortable to freely vote and participate in elections.

Electoral Commission Accountability

287. There are no indirect benefits from this policy.

F.7 Voting and Candidacy Rights of EU Citizens

288. These changes will retain voting rights for EU Citizens living in the UK prior to IPCD. For those arriving after that point it will require a voting agreement to be in place with an EU Member State, for citizens of that Member State to be able to vote and stand in local elections in England and Northern Ireland and PCC elections in England and Wales. This will not apply to citizens of the Irish Republic. Cypriot and Maltese citizens will retain the voting rights they hold as members of the Commonwealth.

F.7.1 Methodology

¹⁰⁴ [CSPL](#)

¹⁰⁵ [Submission by the Minister for Women and Equalities](#), 2009.

¹⁰⁶ Amnesty International

289. Table 17 shows ONS estimates¹⁰⁷ for the number of EU citizens living in England, Northern Ireland and Wales. These estimates include individuals under the age of 18 who are not eligible to register to vote and Irish, Cypriot and Maltese citizens who are not captured by this policy. As such, we have used ONS UK population publications¹⁰⁸ on age to estimate the over 18 population. It is expected the majority of the estimated 2.3 million¹⁰⁹ EU citizens (excluding Irish, Cypriot and Maltese citizens who are not captured by this policy) living in England, Northern Ireland and Wales who are currently eligible to vote and stand would continue to retain their voting and candidacy rights post implementation of these changes. However, this may be a slight underestimate as those who are under 18 and are not eligible to vote will be once they are 18.

Table 17: Estimates of EU populations living in England, Northern Ireland & Wales, ONS 2019-20

	EU citizens living in England, Northern Ireland and Wales	EU citizens living in England, Northern Ireland and Wales aged over 18
EU countries (excluding Ireland & Commonwealth Countries)	2,959,000	2,329,000
<i>Of which:</i>		
<i>EU voting and candidacy rights agreement partners: (Spain, Portugal, Poland, Luxembourg)¹¹⁰</i>	<i>1,166,000</i>	<i>917,000</i>
<i>EU countries without voting and candidacy rights agreements</i>	<i>1,793,000</i>	<i>1,412,000</i>
Ireland	301,000	236,000
Cyprus & Malta (Commonwealth Countries)	19,000	15,000
Total	3,279,000	2,580,000

¹⁰⁷ [ONS estimates on UK residents by individual countries of citizenship.](#)

¹⁰⁸ From [ONS data on mid-year population estimates for the UK by age](#), the Cabinet Office calculated an estimate of 21% of the UK population was under the age of 18. Using this figure with the assumption that the age distribution of EU citizens living in England, Northern Ireland and Wales is similar to that of the overall UK population we have provided an estimate for EU citizens living in England, Northern Ireland and Wales over the age of 18.

¹⁰⁹ Assuming a similar size population of EU citizens is currently living in the UK as in 2019-20.

¹¹⁰ The UK Government has already negotiated voting and candidacy rights agreements with Spain, Portugal, Luxembourg and Poland (although the agreements with Spain and Poland are yet to be ratified by the UK). These agreements will enable UK Nationals living in those countries to vote and stand in local elections and, correspondingly, will allow citizens of those countries, legally resident in the UK, to retain their existing voting and candidacy rights.

290. As a result of the changes, the size of the franchise for local elections in England and Northern Ireland and PCC elections in England and Wales will be impacted. Over time the proportion of EU citizens who had been resident in the UK before the end of the Transition Period will reduce - therefore without further agreements with EU Member States the number of EU citizens with voting and candidacy rights will also reduce.

291. In their provisional long-term international migration estimates, the ONS estimates¹¹¹ that 198,000 EU citizens (including Ireland & Commonwealth Countries) migrated to the UK in 2019. Table 18 shows estimates for the long-term international migration of EU citizens entering England, Northern Ireland and Wales. These estimates include individuals under the age of 18 who are not eligible to register to vote¹¹². As such, we have used ONS UK population publications¹¹³ on age to estimate the over 18 population. Until further voting and candidacy rights agreements are in place, we estimate 95,000 EU citizens currently migrate annually to the UK¹¹⁴ and would not be eligible to register to vote and stand as a candidate at the point of measures coming into force.

Table 18: Cabinet Office estimates of long-term international migration of EU citizens entering England, Northern Ireland & Wales, 2019

	Long-term international migration of EU citizens entering in England, Northern Ireland and Wales	Long-term international migration of EU citizens entering in England, Northern Ireland and Wales aged over 18
EU countries (excluding Ireland & Commonwealth Countries)	171,000	135,000
<i>Of which:</i>		
<i>EU voting and candidacy rights agreement partners: (Spain, Portugal, Poland, Luxembourg)</i>	<i>50,000</i>	<i>40,000</i>
<i>EU countries without voting and candidacy rights agreement</i>	<i>121,000</i>	<i>95,000</i>

292. It should be noted that the UK Statistics Authority reclassified the ONS's long term international migration statistics as 'experimental statistics' where previously they had been 'national statistics' as such the ONS figures should be used carefully. While the

¹¹¹ [ONS provisional long-term international migration estimates](#).

¹¹² In our IA analysis we have provided an estimate for the total number of EU citizens entering the UK of voting age who will be impacted by the changes at the point of their implementation.

¹¹³ From ONS data on mid-year population estimates for the UK by age, the Cabinet Office calculated an estimate of 21% of the UK population was under the age of 18. Using this figure with the assumption that the age distribution of EU citizens entering England, Northern Ireland and Wales is similar to that of the overall UK population we have provided an estimate for EU citizens living in England, Northern Ireland and Wales over the age of 18.

¹¹⁴ In providing this figure it is assumed that migration rates would remain similar to those recorded by the ONS in 2019.

Cabinet Office has used the ONS's long term international migration statistics as a basis for our analysis it should be recognised that other similar datasets exist. The Home Office publishes statistics on applications made to EU Settlement Scheme but as highlighted in their publications these figures "refer specifically to applications made to the EU Settlement Scheme and cannot be directly compared with estimates of the resident population of EU/EEA nationals in the UK" and as a result we have not used these figures in our analysis. Unlike EU Settlement Scheme statistics, our estimates do not include individuals not of voting age, those living in Scotland or family members of EU citizens who are not EU citizens themselves.

293. Data is not collated centrally on the number of EU citizens currently holding elected office, so it is difficult without a baseline to estimate the scale of EU citizens in the UK who are in elected positions.

Impacts on other policy areas of the Bill

294. Donors to political parties, registered third-party campaigners, regulated donees, referendum campaigners, recall petition campaigners and candidates must be registered on a qualifying electoral register. Therefore, this measure will prohibit EU citizens who as a result of the policy changes are removed from the electoral register from making donations. Parties and campaigners are also permitted to accept donations in the form of a bequest if the donor was registered in a qualifying electoral register at some point in the 5 years preceding their death. There are no plans to amend this legislation. This means that an EU citizen without voting and candidacy rights could, in theory, make a donation by bequest for up to five years after they have been removed from the electoral register.

295. The analysis presented on the other Bill measures (Voter ID, Absent Voting, Accessibility, Overseas Electors and Campaigning Measures) does not consider the impact of the change in the franchise as a result of these voting and candidacy rights changes. For example, when estimating the size of the electorate for our costings of the introduction of Voter ID the impact of changes to the voting and candidacy rights of EU citizens has not been incorporated as we cannot at the point of writing specify when future voting and candidacy rights agreements will be reached. It is worth noting, the sensitivity analysis includes a high, central and low scenario for the other Bill measures so it is assumed that the variation from these reforms would be captured by our ranges.

F.7.2 Monetised impacts

296. The impacts of the policy have not been monetised as a result of the limited evidence sourced as part of the policy development. Given the unavailability of this monetised evidence, qualitative analysis has been conducted in order to better understand the impact of the changes to voting and candidacy rights of EU citizens.

F.7.2.1 Direct costs

297. There are no monetised direct costs resulting from this policy.

F.7.2.2 Indirect costs

298. There are no monetised indirect costs resulting from this policy.

F.7.2.3 Direct benefits

299. There are no monetised direct benefits resulting from this policy.

F.7.2.4 Indirect benefits

300. There are no monetised indirect benefits resulting from this policy.

F.7.3 Non-monetised impacts

F.7.3.1 Direct costs

Impact on EU citizens living in the UK

301. Citizens from EU Member States who arrived after IPCD, and who are not Commonwealth or Irish citizens, will not be able to vote and stand for local elections in England and Northern Ireland and PCC elections in England and Wales without a voting and candidacy rights agreement being in place.

302. The full version of the electoral register is used for electoral administration purposes (such as sending out poll cards before elections) and campaigning activities (for example, candidates and political parties sending election communications to voters, surveying opinions or fundraising). Electoral Registration Officers (ERO) are obliged to provide copies of the full electoral register to credit reference agencies upon request. Credit referencing agencies use the electoral registers to help confirm individuals' identities and addresses. Being registered can speed up access to credit, etc. because lenders do not need to separately confirm an applicant's name and address (as required by money laundering regulations).

Impact on electoral service teams in local authorities

303. There will be a cost on local authorities as EROs ensure that those in the UK who are not eligible to register, at the point of measures coming into force, are removed from the register and that this is communicated to them.

304. While it is expected the majority of EU citizens currently on the register will retain their voting and candidacy rights, as a result of the changes there will be a minority of EU citizens who would not be eligible to register at the point of measures coming into force. Local authorities would need to communicate the change in their voting rights to them and remove them from the electoral register. Therefore there will be a cost on local authorities on the time taken to identify the impacted individuals, remove ineligible individuals from the register, issue communications and answer queries on the changes. These costs are

not included in this monetised estimate, as further work is required with local authorities to better understand this burden.

305. In designing the policy for removing from the electoral register those EU citizens who will become ineligible to vote, it is important to maintain existing appeals principles – primarily, that individuals have the right to challenge a decision made by an ERO to remove them from the register. The benefit of maintaining the right of an individual to appeal an ERO’s decision goes further than consistency of principle, however. Information held by an ERO might be inaccurate, meaning the individual in question remains eligible to vote and, therefore, be included on the register. It’s important that the affected individual is able to appeal and make a challenge where this is the case. As a result of the changes there will be an additional burden on local authorities to handle these reviews and appeals.

Impact on international relations

306. These measures will not prevent the UK from signing further voting and candidacy rights agreements with EUMS.

Impact on Electoral Commission to update current guidance

307. There will be an associated cost for the Electoral Commission to update guidance and forms on the electoral registration and electoral processes to reflect these changes. These costs are not monetised as further engagement is required with the Electoral Commission to understand the changes required therefore quantification will be done at a secondary legislation stage.

F.7.3.2 Indirect costs

Monitoring and enforcement costs

308. Once the measures are in force, the Government will apply a trust-based approach to new registrations with citizens of EU countries with a voting and candidacy rights agreement in place and who arrived after the IPCD, when confirming EU citizens eligibility to participate in elections. This means that individuals will be required to confirm they meet the appropriate eligibility requirements when applying to register as an elector or candidate, and an Electoral Registration Officer must be satisfied that an applicant meets these requirements upon registration.

Wider costs to the justice system

309. There is in principle the potential for the proposed policy to lead to a minor increase in the number of individuals submitting fraudulent applications to register (providing incorrect nationality data or immigration status information) in order to get access to voting. In 2016, the Pickles report on electoral fraud also identified the possibility of increased

registration fraud linked to foreign nationals living in the UK legally, but not having voting rights.¹¹⁵ It suggested:

“Some registration fraud may be low-level and simply be motivated to help an individual get (otherwise legitimate) credit, utilities or a mobile phone. Improving credit referencing for eligible foreign nationals could have the potential to mitigate a motivating factor behind registration fraud and, as a result, have the effect of reducing such fraud.”

310. It is considered unlikely the policy changes would significantly increase the number of ineligible individuals seeking to register to vote. The potential impact on the judicial system is also minimal, as should an ERO detect that an application has been made supplying incorrect data, they would simply reject the application. There would be no need in most instances for the police or courts to be involved.

311. The full version of the electoral register is also used for jury summoning in England, Wales and Northern Ireland¹¹⁶ and therefore changes to the franchise will impact upon the number and diversity of individuals who can be summoned.

Impact of credit assurance on businesses

312. There is a direct cost for impacted EU citizens (in the non-monetized direct costs section) of the changes impacted on the success of future loan or credit applications made by EU citizens living in the UK. This cost has the potential to pass on an indirect cost to businesses, as restricting access to credit would impact on the markets in which the credit would have otherwise been spent. This has not been quantified as the scale of lending amongst EU citizens living in the UK is not known.

Voting and candidacy rights of UK citizens resident in the EU

313. These measures will not directly affect the rights of UK citizens in the EU. As set out above, these measures will not prevent the UK from signing further voting and candidacy rights agreements with EUMS. When such agreements come into force, UK nationals will be able to vote and stand in local elections, as they were before the UK left the EU. However, it is worth noting that many EUMS already offer UK nationals voting and candidacy rights, as they do to other third country nationals, but that these will have varying minimum residency requirements.

F.7.3.3 Direct benefits

Integrity of the UK's electoral system

314. The change feeds into the Bill's wider objectives to ensure that the UK's elections are modern, fair and secure. The introduction of this policy will help improve the integrity

¹¹⁵ 'Securing the ballot Report of Sir Eric Pickles' review into electoral fraud' (2016).

¹¹⁶ [GOV.UK: The electoral register and the 'open register'](#)

of the UK's electoral system, by ensuring those EU citizens without legal immigration status are not able to vote and stand in elections.

F.7.3.4 Indirect benefits

Increased use of postage and printing businesses

315. There is a cost for local authorities (in the non-monetized direct costs section) of additional correspondence being sent to EU citizens. This cost passes on a benefit to the printing and postage firms contracted by the local authorities for the production of this correspondence, as they will increase the value of the contracts. This has not been quantified as the increase in profit for these businesses is not known.

F.8 First Past The Post

F.8.1 Monetised Impacts

F.8.1.1 Direct costs

316. The Cabinet Office will explore monetising direct costs relating to this policy in an impact assessment for secondary legislation.

F.8.1.2 Indirect costs

317. The Cabinet Office will explore monetising indirect costs relating to this policy in an impact assessment for secondary legislation.

F.8.1.3 Direct benefits

318. The Cabinet Office will explore monetising direct benefits relating to this policy in an impact assessment for secondary legislation.

319. The net effect of this change is likely to lead to some small savings. One possible saving is from the reduction in spending due to no longer needing to have second round voting counts and a simpler voting system to administer. For example, in the May 2021 PCC elections, second round counts took place in 26 out of the 39 police areas.

F.8.1.4 Indirect benefits

320. The Cabinet Office will explore monetising indirect benefits relating to this policy in an impact assessment for secondary legislation.

F.8.2 Non-monetised impacts

321. The element of costs of elections run on the SV system, attributable to that system in contrast to the FPTP system, are not available at this time. The overall cost of transition is expected to be outweighed by cost savings, more so in the case of an election which might otherwise have gone to a second round of counting. However, in the context of the overall costs of elections run on either SV or FPTP, these differences will likely be minor.

Further analysis will be done at secondary legislation stage to monetise the costs and benefits of the move to FPTP where possible.

F.8.2.1 Direct costs

Training and information costs

322. Voting systems require some activity by local authorities in voter and member education on the system used, and in training of electoral administrators; it will be necessary to revise existing materials. Given the relatively low frequency of elections and the timetable for refreshing material, it is unlikely that the move to delivering guidance on the simpler, FPTP voting system instead of the more complicated SV will lead to a measurable net cost.

323. More time may need to be taken by polling staff to inform people of the system change. However, given that FPTP is simpler than SV and requires less guidance, this may have a neutral cost impact as a whole.

Increased equipment costs

324. Prior investments such as tactile voting devices specific for SV will need to be replaced, although there may be suitable equipment for the general/local FPTP elections that can be used instead.

325. Resources would also require some revision, however printing for each election provides an opportunity for revision, and additional cost is unlikely to be appreciable.

Communication costs

326. Councils would need to inform voters of the changes, for example via social media/their website. Electoral administrators will also need to communicate with candidates about the changes. The Electoral Commission will also communicate the changes through the communication campaigns ahead of the polls.

F.8.2.2 Indirect costs

327. There are no non-monetised indirect costs resulting from this policy.

F.8.2.3 Direct benefits

328. There are no non-monetised direct benefits resulting from this policy.

F.8.2.4 Indirect benefits

329. There are no non-monetised indirect benefits resulting from this policy.

F.9 Overall Summary of Option 1

330. The estimated total quantified benefits and costs are £0 million and £150 million respectively under the central assumptions, which provides a Net Present Social Value for

the Bill under Option 1 of **around £150 million (21/22 prices, 10-year PV) over the 10-year appraisal period**¹¹⁷.

Table 19 - Summary of monetised impacts of the Bill under Option 1 (£m, 2021 - 2031)

	Low	Central	High
Benefits			
Total Benefits	-	-	-
Costs			
Voter identification	65	120	180
Absent Voting	6	10	20
Online Absent Vote Applications	0	0	0
Accessibility	0	0	0
Overseas Electors	8	15	25
Campaigning Measures	0	0.8	2
Voting and Candidacy Rights of EU citizens	0	0	0
First Past The Post	0	0	0
Total Costs	80	150	230
NPSV	-80	-150	-230

Figures may not sum due to rounding

331. Analysis has been conducted to account for any inherent uncertainty associated with modelling the economic impact of the Bill. This is estimated to be +/- 50% of the central scenario. Under the low scenario, the estimated quantified total costs and benefits are £80 million and £0 million respectively, thus giving an **estimated NPSV of -£80 million (10-year PV, 2021/22 prices)**. Under the high scenario, the estimated costs and benefits are

¹¹⁷ See rounding rules at the start of section F.

£230 million and £0 million respectively, **thus resulting in an estimated NPSV of -£230 million (10-year PV, 2021/22 prices)**¹¹⁸.

332. The Business Net Present Value and the Equivalent Annual Net Direct Cost to Business is **estimated to be £0 (2021/22 prices, 10-year PV)** as there are no monetisable impacts on business as a result of this legislation being introduced. Of the monetised impacts outlined in Option 1, they are a transfer and therefore have been excluded from the scope of the BNPV and EANDCB

Option 2 - Mixed identification Model, Absent Voting, Online Absent Vote Applications, Accessibility, Overseas Electors, Campaigning Measures, the Voting and Candidacy Rights of EU Citizens and First Past The Post.

333. Under this Option, only the voter identification policy is different relative to Option 1. This Option assumes a mixed identification approach is taken, whilst Option 1 assumes a photo identification model was introduced. The remaining components of the analysis for Option 2 is assumed to be the same as Option 1.

F.10 Mixed identification model

F.10.1 Methodology

334. This Option uses the same methodology as under Option 1.

F.10.2 Monetised impacts

F.10.2.1 Direct costs

335. For the mixed identification model, all costs, except Voter Card costs, are the same as under the photo identification model as set out under Option 1.

Voter Card costs

336. As with the photo identification model, the mixed identification model will have the provision for people who do not have access to photo or the prescriptive list of non-photo identification¹¹⁹ to access a free, local Voter Card from their LA. However, in this model only a small percentage of the electorate will require a Voter Card as electors can use non-photo identification as well as photo identification.

337. An estimate of 1% of the electorate would need a Voter Card (under the mixed identification model) in General Election years and the first year of rollout, and 0.1% in other years, is carried forward as our central estimate. The 1% is based on results from

¹¹⁸ See rounding rules at the start of section F.

¹¹⁹ The list of identifications accepted under the Mixed Identification model trialled in 2019 is listed in Annex A, [Cabinet Office Voter Identification Pilots 2019: Pre-Pilot Equality Impact Considerations](#)

the Cabinet Office Photographic Identification Ownership Survey, 2021¹²⁰, showing the percent of the electorate that have neither one form of approved photo identification or two forms of approved non-photo identification. In other years, an assumption of 0.1% is used, based on the lower level of demand for Voter Cards in the mixed identification pilot sites and the expected lower levels of demand in local election years.

338. The highest case scenario assumes that, for General Election years, double the amount of Voter Cards are required compared to the central scenario and, in other years, the highest estimate from pilots, rounded up to the nearest percent, is used. The highest case scenario is that 2% of the electorate require a Voter Card for General Election years (and the first year of rollout) and 1% for other years.

339. The lowest case scenario is 0.1% uptake of Voter Cards in General Election years (and first year of rollout) based on the percentage of the electorate who required Voter Cards in pilots, and 0% for other years.

340. Sensitivity analysis has been conducted in section H to test these assumptions further.

341. Administration unit costs, production unit costs, and postage unit costs are the same as under Option 1. The difference in costs is due to lower Voter Card requirements in this model, compared to the photo identification model, meaning that fewer Voter Cards are produced.

342. **Total Voter Card costs are between £3 million and £10 million, with a central estimate of £6 million (21/22 prices, 10 year PV)¹²¹.**

F.10.2.2 Indirect costs

343. There are no monetisable indirect costs of voter identification under this option.

F.10.2.3 Direct benefits

344. There are no monetisable direct benefits of voter identification under this option.

F.10.2.4 Indirect benefits

345. There are no monetisable indirect benefits of voter identification under this option.

F.10.2.5 Summary - BNPV, NPSV, EANDCB

346. Under the central assumptions, the estimated total quantified benefits and costs are £0 million and £110 million respectively, which provides a Net Present Social Value for

¹²⁰ [Cabinet Office Photographic Identification Ownership Survey, 2021](#)

¹²¹ See rounding rules at the start of section F.

voter identification for Option 2 of around **£110 million (21/22 prices, 10-year PV) over the 10-year appraisal period**¹²².

Table 20 - Summary of monetised impacts for voter identification (£m, 2021 - 2031)

Impact	Low	Central	High
<i>Benefits</i>			
Total benefits	-	-	-
<i>Costs</i>			
Equipment costs	1	2	3
Poll card costs	25	55	80
Staff costs	10	20	30
Training costs	4	7	10
Voter Card costs	3	6	10
Comms costs	10	20	30
EC Costs	8	9	10
Total costs	60	110	170
Net Present Social Value	-60	-110	-170

Figures may not sum due to rounding

347. As modelling demand for Voter Card under the mixed identification scenario contains inherent uncertainty, analysis has been conducted to estimate the upper and lower bound of the demand for Voter Card. To account for this, and other uncertainties, a range of +/- 50% of the central scenario has been applied to create a high and low scenario. This has also been applied to other components of the Bill where there are quantifiable appraisals. Under the low scenario, the estimated quantified total costs and benefits are £60 million and £0 respectively, thus **resulting in an estimated NPSV of -£60 million (10-year PV, 2021/22 prices)**. Similarly, under the high scenario, the estimated total costs and benefits are £170 million and £0 respectively, **leading to an estimated NPSV of -£170 million (10-year PV, 2021/22 prices)**¹²³.

348. **The BNPV and EANDCB is expected to be £0** as there are no impacts on businesses which fall in scope of the BNPV and EANDCB. Whilst some businesses may benefit from increased profit as a result of the introduction of this policy, there is no

¹²² See rounding rules at the start of section F.

¹²³ See rounding rules at the start of section F.

available evidence on this and it is therefore not proportional to monetise it. Furthermore, it is a transfer and has therefore been excluded from the BNPV and EANDCB.

F.10.3 Non-monetised impacts

F.10.3.1 Direct costs

Cost of obtaining an Voter Card

349. For the mixed identification model, these costs are the same as under the photo identification model as set out under Option 1, in section F.1.3.1.

Costs to LAs of local outreach for Voter Card

350. For the mixed identification model, these costs are the same as under the photo identification model as set out under Option 1, in section F.1.3.1.

Delivery costs for administration

351. This is more complex to deliver than Option 1 because of the mixed identification requirements. Evidence from the published 2019 CO evaluation suggests those in the mixed identification model found the process more complex to deliver than the photo identification model: In qualitative interviews it was suggested, “*they did feel the list of non-photo identification options was too long as the majority of electors who used this option brought similar documents (poll card and bank card)*”¹²⁴.

A small minority of electors may not complete the voting process or may not return to vote after turning up at the polling station without the correct identification

352. The pilot studies found evidence of a minor impact on people turning up to vote who were turned away and did not return to vote. In the mixed identification pilot studies in 2019, 0.5% of people asked for identification were turned away and did not return to the polling station. We do not have evidence of why these individuals did not have the correct identification or did not return. It is possible that a minority were unaware of the requirement. When asked in a survey after the May elections in 2019, a small proportion (13%) of people who did vote at polling stations in pilot areas said they were unaware of the requirement¹²⁵. The communications campaign for this policy would seek to ensure that all voters were aware of the policy and the opportunity to apply for a free, local Voter Card, from their LA.

353. Overall, a small minority of electors who did not vote in the 2018 and 2019 pilot studies cited identification requirements as the reason for not casting their vote in post-election polling commissioned by the Cabinet Office¹²⁶. As set out under Option 1 for the

¹²⁴ 2019 Voter Identification Pilots Evaluation

¹²⁵ Electoral Commission, 2019 Voter Identification Pilot Evaluation, [Post Poll Identification Pilot data tables](#), spreadsheet, Table 83

¹²⁶ [2018 Voter Identification Pilot Evaluation](#) (overall sample of 500 in each of the five identification pilot areas); [2019 Voter Identification Pilots Evaluation](#) (overall sample of 600 in each of Woking and Pendle).

photo identification model, the 2019 Cabinet Office pilot evaluation found that the main reason cited across all models for not voting was a lack of time (between 13% and 20% of those who reported not voting in each model). Very few stated a reason related to not having the correct identification. The EC's 2019 evaluation found a similar proportion, 1% of those who did not vote, who said this was because they did not have identification¹²⁷. Similarly, very few stated they did not vote because they disagreed with the requirement.

354. There is no evidence of the potential impact of this in a Parliamentary General Election. As set out under Option 1 for the photo identification model, a minority of the population in Great Britain (2%), were found not to have at least one form of photo identification out of the identifications expected to be accepted under the policy.¹²⁸ People were less likely to have non-photo identification, with 9% saying they did not have two or more forms of non-photo proof of identity or address.

355. In the mixed identification pilot areas, 6% said the requirement to bring photo identification made them less likely to vote, and 7% said it made them more likely to vote, according to the Cabinet Office's evaluation¹²⁹. Electors were put off more by the requirement to bring *non-photo* identification such as a birth certificate, bank/building society statement or debit/credit or utility bill, with 12% in mixed identification pilot areas saying it would make them less likely to vote, and 3% saying it would make them more likely to vote¹³⁰.

356. Voters will continue to have access to three methods of voting - in person at a polling station, by proxy vote, and by postal vote. The 'wider impacts' section outlines how the new requirements might impact on electors' intention to vote in person. The Voter Card will provide a free form of identification that electors can apply for. In addition, organisations representing age, race, and gender reassignment have highlighted that certain groups with protected characteristics may face attitudinal difficulties with presenting identification, some based on previous negative experiences. This is discussed further in the Equality Impact Assessment for the Bill, along with mitigations that will be taken to address these potential impacts.

Cost of creating an online Voter Card application service

357. This is expected to be the same as Option 1. However, whilst the set up costs are likely to be the same as under photo identification, the ongoing costs may be lower as there is lower demand for Voter Cards under the mixed identification model.

F.10.3.2 Indirect costs

More people opting for postal votes

¹²⁷ Electoral Commission, Identification [pilots post-wave report 2019](#)

¹²⁸ [Cabinet Office Photographic Identification Ownership Survey, 2021](#)

¹²⁹ [Cabinet Office Voter Identification Pilots Evaluation 2019 Spreadsheet, Table 47, columns AF and J](#)

¹³⁰ [Cabinet Office Voter Identification Pilots Evaluation 2019 Spreadsheet, Table 51, column H](#)

358. For the mixed identification model, these costs are the same as under the photo identification model as set out under Option 1, as in section F.1.3.2.

F.10.3.3 Direct benefits

Increased belief that there are sufficient safeguards to prevent electoral fraud

359. While overall concern about electoral fraud among the electorate is low, there was a substantial increase in electors' perception that there are sufficient safeguards in place to prevent electoral fraud at polling stations in the post-election survey in the mixed identification pilots in 2019 (78%, up from 63%). There was no impact on the perception that there is enough electoral fraud in polling stations to affect election results. In the mixed identification pilots in 2018, substantially more eligible electors agreed that there were sufficient safeguards in place to prevent electoral fraud in polling stations in both pilot areas after election day: this increased by six percentage points in Gosport (35% to 41%) and 12 percentage points in Bromley (50% to 62%).

360. In mixed identification pilot areas, there was no impact on perceptions of the incidence of electoral fraud in the local area. Those surveyed after the election remained unlikely to think that electoral fraud happens in their own area in general. Within the mixed identification model, substantially more people reported this in Derby (13%) than on average (7%), as was also seen in the pre-election survey¹³¹.

361. The EC's evaluation of the 2019 pilots noted "*It is not possible to assess whether the identification requirement prevented any actual attempts to commit impersonation fraud*" and that "*There is no evidence to suggest that the absence of allegations in the pilots was because of the identification requirements.*" When evaluating the security strengths and weaknesses of each model it found "*the photo identification-only model has the greatest security strengths compared with the other models*", while the mixed identification model was seen to benefit from having the same high or medium strength documents as in the photo identification-only model but was weakened by some factors including accepting non-photo documents not officially issued¹³². The policy addresses the EC's recommendation from its 2014 review into Electoral Fraud that Electors should be required to show proof of their identity before they can be issued with a ballot paper at polling stations for elections and referendums in Great Britain¹³³. It also brings the UK in line with practices by many other countries where voters are required to present some form of identification in order to vote¹³⁴.

Increased or maintained satisfaction in the electoral process

362. In 2019, levels of satisfaction in the process of voting in mixed identification pilots were similar after polling day according to the Cabinet Office evaluation (85%, compared to 83% prior to polling day). In 2018, confidence remained unchanged in both mixed

¹³¹ [2019 Voter Identification Pilots Evaluation](#)

¹³² [Electoral Commission, "Impact on security"](#), October 2019

¹³³ [Electoral Commission, Electoral fraud in the UK: Final report and recommendations, January 2014](#)

¹³⁴ [Electoral Commission, Electoral fraud in the UK: Final report and recommendations, January 2014](#)

identification models, where confidence was already high at 97% in Bromley and 94% in Gosport¹³⁵. Satisfaction substantially increased in one of the two mixed identification models (Gosport, from 80% to 85%).

363. However, in the EC’s 2019 evaluation satisfaction with the process of voting decreased post election day, both in pilot areas (73% in Mixed pilot areas, 69% for photo pilot areas and 68% for poll card pilot areas, compared to 83% for all pilot types in the pre wave) and across England as a whole (62% in the post poll, compared to 77% in the Winter Tracker survey). Since this was seen at national level as well as in pilot areas they concluded that this suggested the pilots were not the cause of the increase. Taken together with the Cabinet Office evaluation this suggests that satisfaction and confidence in elections would remain unchanged or in some cases may increase as a result of the mixed identification model.

F.10.3.4 Indirect benefits

Increased engagement with vulnerable groups and civil society groups

364. For the mixed identification model, these benefits are the same as under the photo identification model as set out under Option 1, in section F.1.3.4.

Increased profits for businesses

365. For the mixed identification model, these benefits are the same as under the photo identification model as set out under Option 1, in section F.1.3.4.

F.11 Absent Voting, Online Absent Vote Applications, Accessibility, Overseas Electors, Campaigning Measures, Voting and Candidacy Rights of EU Citizens and First Past The Post

366. The remaining components of the Bill for Option 2 are assumed to be the same as Option 1, and therefore they have not been repeated here.

F.12 Overall Summary of Option 2

367. Under the central assumptions, the estimated total quantified benefits and costs are £0 million and £140 million respectively, which provides a Net Present Social Value for the Bill under Option 2 of around **-£140 million (21/22 prices, 10-year PV) over the 10-year appraisal period**¹³⁶.

Table 21 - Summary of monetised impacts of the Bill under Option 2 (£m, 2021- 2031)

	Low	Central	High

¹³⁵ [2018 Voter Identification Pilot Evaluation](#)

¹³⁶ See rounding rules at the start of section F.

<i>Benefits</i>			
Total benefits	-	-	-
<i>Costs</i>			
Voter identification	60	110	170
Absent Voting	6	10	20
Online Absent Vote Applications	0	0	0
Accessibility	0	0	0
Overseas Electors	8	15	25
Campaigning Measures	0	0.8	2
Voting and Candidacy Rights of EU Citizens	0	0	0
First Past The Post	0	0	0
Total costs	75	140	210
NPSV	-75	-140	-210

Figures may not sum due to rounding

368. As there is uncertainty with modelling the economic impact for the Bill under Option 2, analysis has been conducted to estimate the upper and lower bound of the demand for Voter Cards. This is estimated to be +/- 50% of the central scenario. Under the low scenario, the estimated quantified total costs and benefits are £75 million and £0 respectively, thus **resulting in an estimated NPSV of -£75 million (10-year PV, 2021/22 prices)**. Similarly, under the high scenario, the estimated total costs and benefits are £210 million and £0 respectively, **leading to an estimated NPSV of -£210 million (10-year PV, 2021/22 prices)**¹³⁷.

369. However, the scenarios outlined above do not show the full extent of the range of impacts as further sensitivity analysis has been conducted in section H. These show the change in outputs when the estimated uptake for the estimated Voter Card assumption is adjusted.

370. **The BNPV and the EANDCB are both £0 under this Option is expected to be £0** as it is not proportional to monetise the impact of increased sales of equipment costs and postage and production due to limited available evidence.

¹³⁷ See rounding rules at the start of section F.

F.13 Summary of voter identification in Option 1 and 2

371. Table 22 compares the qualitative and quantitative differences of voter identification under Option 1 and Option 2. As the remaining components of the Bill are the same across both Options, they have been excluded from the table.

Table 22 - Summary of voter identification in Option 1 and 2

	Option 1 (photo identification)	Option 2 (mixed identification)
Benefits¹³⁸		
Increase belief there are sufficient safeguards to prevent electoral fraud (non-monetised)	<p>Photo identification pilot models were the only ones to show an increase in those <i>disagreeing</i> that there is enough electoral fraud to affect election results (with 35% disagreeing after polling day in 2019, up from 30% prior to polling day). There were substantial increases in the belief there are sufficient safeguards to prevent fraud at polling stations (from 57% to 63%) (from 57% to 63%), and mixed evidence on the impact on perceptions of the incidence of electoral fraud in the local area.</p> <p>The EC found the photo identification model to have the greatest security strengths.</p>	<p>In mixed identification pilot models, there were substantial increases in the belief there are sufficient safeguards to prevent fraud at polling stations (from 63%, to 78% agreeing after polling day in 2019). There was no impact on the perception that there is enough electoral fraud to affect election results (42% disagreed with this after polling day in 2019, unchanged from 40% prior to polling day), and on perceptions of the incidence of electoral fraud in the local area.</p> <p>The EC found the mixed identification model to benefit from documents in the photo identification model but to be weakened by accepting non-photo documents not officially issued.</p>
Increased satisfaction in the electoral process (non-monetised)	<p>There is some evidence of increased satisfaction with the process of voting in the photo identification model, and of unchanged levels of satisfaction.</p> <p>In the 2018 photo identification model satisfaction increased from 82% to 90% post-election day. This remained at 82-83% in 2019.</p>	<p>There is some evidence of increased satisfaction with the process of voting in the mixed identification model, and of unchanged levels of satisfaction.</p> <p>In the 2018 mixed identification models satisfaction increased in one area (Gosport), from 80% to 85% post-election day. Levels of satisfaction were unchanged in 2019, remaining at 83-85%.</p>

¹³⁸ Non-monetised evidence from the evaluations can be found in the [2018 Voter Identification Pilot Evaluation](#), [2019 Voter Identification Pilots Evaluation](#), Electoral Commission, Identification [pilots post-wave report 2019](#)

Increased engagement with vulnerable groups and civil society groups (non-monetised)	Engagement with the equality duty was found to increase across all authorities as a result of piloting voter identification.	
Increased sales for business (non-monetised)	Additional equipment will be bought to assist with the implementation of voter identification.	
Costs¹³⁹		
Total voter identification costs (£m)	120	110
<i>Of which, Voter Card costs (£m)</i>	15 (2% demand for Voter Card in first year and General Elections)	6 (1% demand for Voter Card in first year and General Elections)
Complexity	<p>This is less complex to deliver than option 2 because of the voter identification requirements.</p> <p>Evidence from the published 2018 CO evaluation suggests those in the photo identification model found the process more straightforward than the mixed identification model:</p> <p>In qualitative interviews, it was suggested, <i>“they kept their list of acceptable identifications short to make the process straightforward, and as a result found the data capture process easier than authorities trialing the mixed model”</i>.</p>	<p>This is more complex to deliver than option 1 because of the voter identification requirements.</p> <p>Evidence from the published 2019 CO evaluation suggests those in the mixed identification model found the process more complex to deliver than the photo identification model:</p> <p>In qualitative interviews it was suggested, <i>“they did feel the list of non-photographic identification options was too long as the majority of electors who used this option brought similar documents (poll card and bank card)”</i>.</p>
Cost to electors of obtaining a Voter Card (non-monetised)	This is a time and travel cost.	Unit cost of applying for Voter Card is the same across models, although expected lower levels of demand for Voter Cards in the mixed identification model will reduce this cost overall.
Cost to LAs of local outreach for	There is an optional cost for LAs setting up or utilising local hubs	There is an optional cost for LAs setting up or utilising local hubs

¹³⁹ Non-monetised evidence from the evaluations can be found in the [2018 Voter Identification Pilot Evaluation](#), [2019 Voter Identification Pilots Evaluation](#), Electoral Commission, Identification [pilots post-wave report 2019](#)

Voter Cards (non-monetised)	for Voter Card.	for Voter Card. Expected lower levels of demand for Voter Cards in the mixed identification model may reduce this cost, compared to the photo identification model, as less outreach may be required.
A small minority of electors may not complete the voting process (non-monetised)	<p>The vast majority of people who turned up at the polling station during the 2018 and 2019 voter identification pilots were able to cast their vote.</p> <p>In the photo identification model, 0.4% of people asked for identification did not have the correct identification and did not return to the polling station in 2019. This is a similar proportion to the mixed identification model.</p> <p>Overall, a small minority of electors who did not vote in the 2018 and 2019 pilot models cited identification requirements as the reason for not casting their vote.</p>	<p>The vast majority of people who turned up at the polling station during the 2018 and 2019 voter identification pilots were able to cast their vote.</p> <p>In the mixed identification model, 0.5% of people asked for identification did not have the correct identification and did not return to the polling station in 2019. This is a similar proportion to the photo identification model.</p> <p>Overall, a small minority of electors who did not vote in the 2018 and 2019 pilot models cited identification requirements as the reason for not casting their vote.</p>
More people opting for postal votes (non-monetised)	<p>The new requirements for voting in person may lead to more people opting for postal or proxy voting, which could potentially increase costs to the UK government. However, there is little evidence this would happen. 6% of individuals responding to a 2021 survey commissioned by the Cabinet Office said having to present photo identification would make them less likely to vote <i>in person</i>, while 5% said it would make them more likely to vote in person, suggesting overall there may be little change. The majority, 89%, said it would make no difference to how they would vote.</p>	
Cost of creating an online Voter Card application service and cost of data storage (non-monetised)	<p>Electors without approved forms of identification will be able to apply for a Voter Card online. This will involve the creation of a digital service and will incur a cost. In addition, LAs may have a cost of storing data on their election management system. These unit costs are expected to be the same across the models.</p>	

Figures may not sum due to rounding

372. Table 22 shows that photo identification is more costly than the mixed identification model **by around £10m over the ten-year appraisal period**. However, the table also summarises that whilst the mixed identification model is cheaper (meeting the cost key performance indicator for the policy, set out in Table 2), it proved to be more complex to administer and it did not offer as much security as the photo identification model, which the

EC has said would provide the greatest level of security.¹⁴⁰ The EC's security evaluation of acceptable identification documents under each model found that the photo identification model included only documents considered high or medium strength, while the mixed identification model incorporated other not officially issued non-photo documents which were considered low strength. The photo identification model had the most pronounced impact on the measures of public perceptions of integrity. In the Cabinet Office's 2019 evaluation, photo identification was the only model where there was an increase in those *disagreeing* that there is enough electoral fraud to affect election results.¹⁴¹ In addition, the 2019 evaluation conducted by the EC showed a notable increase in the proportion of respondents saying that electoral fraud is not a problem from before the pilot to after election day, with an increase from 13% to 32% under photo identification, the clearest increase across options. The increase for mixed identification was from 13% to 27%.¹⁴² Mixed identification therefore performs worse on the key performance indicators of delivery and integrity. The photo identification model performs better against the key performance indicators of delivery and integrity, and both models performed similarly in the pilots against the accessibility KPI. For those reasons, **Option 1 is the Government's preferred approach.**

373. The table below compares Option 1 and 2 to the counterfactual.

Table 23 - Comparison of Option 1 and 2 to the baseline (£m, central scenario, 10-year PV)

Impacts	Option 1	Option 2
<i>Additional Benefits</i>		
Total benefits	-	-
<i>Additional Costs</i>		
Voter identification	120	110
Absent Voting	10	10
Online Absent Vote Applications	0	0
Accessibility	0	0
Overseas Electors	15	15
Campaigning Measures	0.8	0.8
Voting and Candidacy Rights of EU Citizens	0	0
First Past The Post	0	0

¹⁴⁰ Electoral Commission, [May 2019 Voter Identification pilot schemes](#).

¹⁴¹ Cabinet Office, [Voter Identification Pilot Evaluation 2019](#).

¹⁴² Electoral Commission, [May 2019 Voter Identification pilot schemes](#).

Total costs	150	140
Total NPSV	-150	-140

Figures may not sum due to rounding

374. The table above shows that Option 2 is clearly cheaper than Option 1. However as highlighted in table 22, the mixed identification model (in Option 2) is more complex to administer and less secure relative to the photo identification model (in Option 1). Therefore Option 1 is the **Government's preferred approach**.

G. Direct costs and benefits to business calculations

375. The introduction of the digital service and changes to the IERDS will likely result in additional costs for EMS suppliers to adapt their own systems. However, these are currently uncertain and will be developed as a part of future service design ahead of secondary legislation.

H. Risks and sensitivities

376. This section outlines the analytical and policy risks associated with the Bill, and it also provides sensitivity analysis to test the assumptions outlined in the central scenario. Of the risks associated with this Bill, the key analytical risks are the lack of data on the percentage of the electorate that will require a Voter Card, and the uncertainty in the expected uptake of registration among the newly franchised British citizens living abroad.

H.1 Risks

H.1.1 Voter identification

377. The primary risk is that there is a lack of data to underpin the assumptions used in the economic cost modelling. Specifically, the percentage of the electorate that will require a Voter Card is uncertain, which may have financial and delivery implications. Each additional percentage point increase in demand for Voter Cards (for both General Election, and non-General Election years) adds an additional £10.2 million to the total costs of the policy (21/22 prices, 10 year PV)¹⁴³. To mitigate this risk, low and high ranges have been considered for this assumption, which are believed to appropriately cover the uncertainty, as seen in the sensitivity analysis below.

378. Voters will be required to bring photo identification when they vote, and in circumstances where they do not have photo identification, they will be able to apply for a free Voter Card. However, some evidence suggests more people could seek to obtain a Voter Card than require it, with 31% of people in Great Britain saying they would apply for one when given a basic description of it. In addition, costs of +/-50% are presented to further account for uncertainty. The communications campaign for the policy will also seek

¹⁴³ This is only for the photo identification model.

to highlight that the voters will need photo identification at the elections, and if they do not have one of the approved forms of identification, they can apply for a Voter Card.

379. Pilot data, data from the EC and other sources has been used to inform the estimate of Voter Card requirements, and a range has been provided to mitigate against the uncertainty. The Cabinet Office is also working with relevant civil society groups to collect qualitative evidence.

380. In addition, there is a risk that the true impact of the policy on turnout and on electoral fraud cases is misunderstood. The pilot evaluations were unable to assess the impact on turnout or on the number of allegations or proven cases of electoral fraud. Levels of turnout fluctuate year-on-year as a result of a range of factors, even between the same types of elections. This is also impacted by limited comparable data in some instances, such as where pilot areas had recent boundary changes. With regard to the impact on electoral fraud, the EC concluded in 2019 that *“It is not possible to assess whether the identification requirement prevented any actual attempts to commit impersonation fraud. There is no evidence to suggest that the absence of allegations in the pilots was because of the identification requirements.”*

381. Voter identification will place additional workload on LA and poll station staff, and there is a risk that this has been underestimated or overestimated, which may impact on policy delivery. The burden on LA staff will depend on the amount of Voter Cards required and how the public responds to the policy (eg, how many queries there will be and the number of last minute Voter Card applications). To mitigate this, Cabinet Office are planning to work with LAs to gather further data to inform assumptions and plan mitigations to any identified problems. This will feed into further analysis which will accompany secondary legislation.

382. There is a risk that the potential impact that voter identification may have on postal or proxy voting behaviour has been underestimated due to limited evidence. It is possible that it may encourage some electors to switch away from voting in person and to postal voting if they do not have the required identification. Postal voting is trusted less than voting in person with 64% of UK adults perceiving postal voting as safe from fraud or abuse and 26% believing it to be unsafe, compared to 85% and 26% respectively for voting in a polling station¹⁴⁴. As a result there is a risk that the policy could adversely impact on perceptions of levels of fraud and abuse in the electoral process. There is also the prospect that potential fraudsters will see the in-person ballot as very secure as a result of these changes and divert fraud to postal voting. However, there is already a requirement for postal voters to provide personal identifiers when applying to vote by post and when voting, and it is noted that allegations of and proven cases of fraud in the electoral system are low. Other changes will also be introduced in the Bill which will further strengthen the security of absent voting and also lower the perception of fraud, and this should help mitigate this risk.

H.1.2 Absent Voting

¹⁴⁴ Electoral Commission 2020 Winter Tracker

383. There is a risk that the number of long term postal and proxy voters has been overestimated given that it is assumed at 100% and 96% respectively. This may mean that costs are overestimated. To mitigate against this, a lower scenario of - 50% of costs has been considered to account for this uncertainty. As the economic impact of this area is relatively small compared to the overall impact of the Bill, the risks associated with the assumptions in this analysis are likely to be small.

384. In addition, there is a risk that the assumption that long-term postal voters will be contacted every three years, spread equally across years, at one third contacted each year, may not be accurate. There is a chance that this cycle will not be evenly distributed and may underestimate spending in some election years. If there is underspend in one year of the three year cycle, the model will ensure there is overspend in the other two years to balance this.

385. There is also a risk that long term postal voters are unaware of the need to renew every 3 years, and therefore may be struck off the postal voting register and may be unable to vote by postal ballot. However, to mitigate against this, electors will be sent 2 letters to remind them of the need to renew. If an elector does not reapply for a postal vote in response to these letters, the elector will remain on the electoral register and will be able to vote in person and may reapply for a postal vote at any time.

H.1.3 Online Absent Vote Applications

386. The primary risk with the analysis for OAVA is the lack of quantifiable impacts due to the uncertainty of elector behaviour in response to the new online system. It is not possible to quantify these estimates as illustrative scenarios may lack accuracy and impacts may be disproportionate. However, robust qualitative analysis has been conducted to address this risk where possible. Further analysis will also be conducted to better quantify these impacts (where possible) for secondary legislation.

387. We are in the process of undertaking thorough research and impact analysis on identification requirements. We will be modelling different identification requirements in order to ensure that the final process is as accessible as possible. The delivery risks for the roll out of OAVA are low as the digital platform has already been built. Whilst work is being undertaken to understand the best identity verification approach for the new service, at a minimum, use of the existing NINO matching process (as used in the Register to Vote service) would allow roll out of an MVP with a minimal amount of development work.

H.1.4 Accessibility

388. Under the new rules, LAs are able to buy equipment that they think reasonably helps disabled voters to vote independently, but it is assumed that LAs will follow the guidance produced by the EC. Given that ROs have more flexibility to choose what type of equipment they purchase, there is a risk of a lack of quantifiable impacts due to the variability of equipment, thus making costs difficult to estimate. However, to mitigate against this qualitative analysis has been conducted where possible.

H.1.5 Overseas Electors

389. The primary risk in this analysis surrounds the uncertainty in the expected uptake of registration among the newly franchised British citizens living abroad. There is a risk that this Impact Assessment does not accurately estimate the true future volumes of overseas electors, leading to both financial and delivery implications.

390. There is a direct positive relationship between the successful implementation of the overseas elector policy and its financial cost: the greater the increase in the number of overseas electors registered the higher the associated on-going electoral registration and electoral costs of having a bigger franchise. To mitigate the risk of this IA not accurately estimating the future level of registration rates amongst overseas electors and therefore the cost of the policy changes, we have further explored the impact of varying the registration rates on the NPV in the sensitivity analysis section.

391. This is also an associated risk to LAs, particularly in pre-election periods, as they will be responsible for processing all of the additional registrations, which are often more involved than registration applications and votes from ordinary electors. The mitigation for this risk is not to attempt to reduce the number of overseas electors registering as this would undermine the policy, but instead to ensure the LAs have sufficient resources to administer the processes and to continue to streamline our electoral processes to minimise the workload.

H.1.6 Campaigning Measures

392. The primary risk with the analysis for Campaigning Measures is the lack of quantifiable impacts due to the limited available data. It is difficult to accurately estimate the economic impact due to a lack of data and lack of evidence on the behavioural response of campaigners to this suite of policies. However, robust qualitative analysis has been conducted where possible to address these risks. Furthermore, the impacts that arise from Campaigning Measures are likely to be small when compared to other areas of the Bill, such as proposals for voter identification or overseas electors, which will have an impact on the electorate as a whole, rather than just those who participate in the campaigning process.

H.1.7 Voting and Candidacy Rights of EU citizens

393. The primary risk associated with this impact assessment analysis is the lack of available data on the monetised impacts of the policy changes. Given the unavailability of this data, qualitative analysis has been conducted in order to better understand the impact of the changes, however this carries the risk that the monetised costs and benefits of the policy are not fully captured within the NPV.

H.1.8 First Past The Post

394. The primary risk with the move to FPTP from the SV voting system for PCCs is that the transition results in short term confusion for voters and therefore it does not deliver a simplified election process for voters, nor reduce the proportion of rejected or spoilt ballots,

in the immediate term. This will be mitigated against by ensuring the change is communicated to the electorate in advance of the first set of elections under FPTP.

395. A change to the voting system for these elections could cause some short-term confusion as the electorate adjusts to FPTP being used as opposed to SV. However, this is considered a small risk as the electorate are familiar with FPTP and there will be information provided locally by councils and by the Electoral Commission nationally, about FPTP being used as the voting system.

396. There could be some extra preparation work needed locally for the first set of elections that use FPTP, though again this is small as local areas will already be familiar with administering FPTP elections.

H.2 Sensitivity Analysis

397. The estimates outlined above are based on assumptions which are highly uncertain, and therefore any changes in these assumptions may have a substantial impact on the overall outputs. The percentage of the electorate requiring a Voter Card and the proportion of overseas electors who register each year are the most uncertain assumptions, therefore two sensitivity scenarios have been produced below to account for possible changes in these uncertain assumptions.

398. Sensitivity 1 represents a 'best case scenario' where there are low requirements for Voter Card, and high new overseas elector registrations. Sensitivity 2 represents a 'worst case scenario' where the requirement for a Voter Card is high, and there is low take up of new overseas elector registrations.

Option 1

- **Sensitivity 1 - Lower take up of photo identification/Higher take up of Overseas Electors**
 - Under this scenario, the demand for Voter Cards is 1% in GE years and the first year of the policy, and 0.1% in non-GE years. This is based on the photo identification pilots in 2018 and 2019 where 0.1% was the highest uptake in a photo identification model pilot site, rounded to the nearest percentage for the higher estimate.¹⁴⁵ The low scenario for non GE years reflects the highest uptake in a photo identification model pilot site.
 - The proportion of overseas electors who register in election and non-election years is assumed to be 36% and 9% respectively.
 - Absent Voting, Online Absent Vote Applications, Accessibility, Campaigning Measures, Voting and Candidacy Rights of EU Citizens and First Past The Post are assumed to remain the same as the central scenario.

- **Sensitivity 2 - Higher take up of photo identification/Lower take up of Overseas Electors**

¹⁴⁵ Woking 2018 = 64 (0.09% of electorate), Woking 2019 = 30 (0.04% of electorate); Pendle 2019 = 70 (0.1% of electorate)

- This scenario assumes that the demand for Voter Cards are 4% in GE years, and the first year of the policy, and 2% in non-GE years. The 4% estimate is based on the Cabinet Office Photographic Identification Ownership Survey that found 4% of eligible voters stated that they did not own recognisable photo identification, whilst the 2% estimate is based on the proportion of eligible voters who do not have photo identification, from the same survey. The proportion of overseas electors who register in election and non-election years is assumed to be 9% and 2% respectively.
- Absent Voting, Online Absent Vote Applications, Accessibility, Campaigning Measures, Voting and Candidacy Rights of EU Citizens and First Past The Post are assumed to remain the same as the central scenario.

Table 24: Summary of sensitivity analysis for Option 1¹⁴⁶ (£m, 10-year appraisal period)

	Central	Sensitivity 1	Sensitivity 2
Benefits			
Total benefits	0	0	0
Costs			
Photo identification	120 (65-180)	110	140
Overseas Electors	15 (8-25)	45	3
Others (Campaigning Measures, Absent Voting, Online Absent Vote Applications, Accessibility, Voting and Candidacy Rights of EU Citizens and First Past The Post)	15 (6-20)	15	15
Total costs	150 (80-230)	170	160
NPSV	-150 (-80 to -230)	-170	-160

Figures may not sum due to rounding

¹⁴⁶ See rounding rules at the start of section F.

399. The results from sensitivity 1 indicate that the net economic cost would be around 10% higher compared to the central scenario under Option 1. This is largely attributed to the increase in registrations of overseas electors more than offsetting the reduction in cost of voter identification due to the lower take up of Voter Cards.

400. However under sensitivity 2, the net economic cost would be broadly similar relative to the central scenario (over the ten-year appraisal period), and this is due to the increase in take-up of Voter Card being offset by the reduction in costs as a result of fewer registrations of overseas electors.

401. Both scenarios fall within the range of uncertainty that has been modelled for the central estimate. Furthermore, if the most costly components of photo identification and overseas electors fell in the same scenario, it would still remain in the uncertainty range between -£80m and -£230m.

Option 2

- **Sensitivity 1 - Lower take up of mixed identification/Higher take up of Overseas Electors**
 - Under this scenario, the demand for Voter Cards is 0.1% in GE years, and 0% in non-GE years. This is based on the photo identification pilots in 2018 and 2019 where 0.1% was the highest uptake in a photo identification model pilot site, rounded to the nearest percentage¹⁴⁷.
 - The proportion of overseas electors who register in election and non-election years is assumed to be 36% and 9% respectively.
 - Absent Voting, Online Absent Vote Applications, Accessibility, Campaigning Measures, Voting and Candidacy Rights of EU Citizens and First Past The Post are assumed to remain the same as the central scenario.

- **Sensitivity 2 - Higher take up of mixed identification/Lower take up of Overseas Electors**
 - This scenario assumes that the demand for Voter Cards are 2% in GE years, and 1% in non-GE years. This is double the central scenario in GE years, and the highest scenario found in pilots for non-GE years, rounded up to the nearest percent.
 - The proportion of overseas electors who register in election and non-election years is assumed to be 9% and 2% respectively.
 - Absent Voting, Online Absent Vote Applications, Accessibility, Campaigning Measures, Voting and Candidacy Rights of EU Citizens and First Past The Post are assumed to remain the same as the central scenario.

Table 25: Summary of sensitivity analysis for Option 2¹⁴⁸ (£m, 10-year appraisal period)

	Central	Sensitivity 1	Sensitivity 2
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¹⁴⁷ Woking 2018 = 64 (0.09% of electorate), Woking 2019 = 30 (0.04% of electorate); Pendle 2019 = 70 (0.1% of electorate)

¹⁴⁸ See rounding rules at the start of section F.

Benefits			
Total benefits	0	0	0
Costs			
Mixed identification	110 (60-170)	110	120
Overseas Electors	15 (8-25)	45	3
Others (Campaigning Measures, Absent Voting, Online Absent Vote Applications, Accessibility, Voting and Candidacy Rights of EU Citizens and First Past The Post)	15 (6-20)	15	15
Total costs	140 (75 - 210)	160	140
NPSV	-140 (-75 to -210)	-160	-140

Figures may not sum due to rounding

402. The net economic cost under sensitivity 1 increases by up to 15% relative to the central scenario (over the ten-year appraisal period), and this is primarily attributed to the increase in the registrations of overseas electors. The costs under sensitivity 2 decrease by around 5% compared to the central scenario, and this is largely attributed to the increase in the take-up of Voter Card, which causes an increase in the wider costs of voter identification, but this is more than offset by the fall in costs from fewer overseas elector registrations.

403. The economic impact outlined in both sensitivity scenarios fall within the uncertainty range of the central scenario.

I. Impact on small and micro businesses

404. As outlined in section G, the primary costs to small and micro businesses are the additional costs to EMS suppliers for adapting their systems for the introduction of the digital service for OAVA. However, there is limited information what the overall impact is estimated to be, and this will be further costed up ahead of secondary legislation.

J. Wider impacts

405. The purpose of the Bill is to strengthen the UK's democracy, and ensure that our elections remain secure, fair, modern and transparent. These proposed changes are therefore likely to impact those from protected groups. Under the Equality Act 2010, Section 149 (1), we have a duty to consider the equality impact and accessibility of any digital or service changes we introduce, including any mitigations that may be required. We have undertaken an Equality Impact Assessment throughout policy development which has helped us understand the key equality impacts and the protected characteristics these may interact with.

406. We will continue to make appropriate equality considerations throughout the legislative process as we move to the secondary legislation and service design and also at the post-legislative assessment stage.

J.1 Voter identification

407. We estimate that 2% of the electorate may not have access to photo identification and may require a Voter Card. Within this, there is evidence that certain protected characteristics may find it harder to access identification, which the provision of a free Voter Card is designed to address. The protected groups we have identified who may find the introduction of the Voter Card of particular benefit are age, race, disability, gender reassignment and religion¹⁴⁹.

- a. **Age:** The 2021 Cabinet Office commissioned survey of photo identification ownership found that those aged 50-69 were slightly less likely to hold photo identification (3% did not hold the accepted forms of identification, compared to 2% overall), while those from the youngest age group (18-29) were slightly more likely to own photo identification (1% did not hold the accepted forms of identification). This research found older populations (those aged 50-69 and 70+) were more likely than people overall to report that the introduction of identification at polling stations will make it quite difficult or very difficult to vote.
- b. **Race:** Evidence from the survey suggests that there are small differences in photo identification ownership between ethnic groups. The percentage of individuals from minority ethnic groups (excluding white minorities) who have no photo identification (1%) was lower than those who identify as White (2%).
- c. **Electors with certain disabilities:** Evidence from the survey suggests that people with disabilities are less likely to hold the accepted forms of photo identification. Individuals with a severely limiting disability were less likely to hold photo identification than people overall (with 5% not holding accepted forms of photo identification). Furthermore, individuals with severely (12%) or somewhat (8%) limiting disabilities were more likely than those with no disabilities (4%) to report that the identification requirement would make it difficult or very difficult to vote.

¹⁴⁹ Our analysis reports on sub-groups where they are significantly different from the overall sample, at the 95% confidence level. In the survey, there was no statistically distinguishable difference in photo identification ownership by sex, religion or sexuality. Please note that for some subgroups in these categories, the base number of respondents was too low for reliable statistical comparisons to be made.

- d. **Electors who are transgender or non-binary:** We have no quantitative evidence to understand the impact of access to identification on individuals who have experienced gender reassignment. We are reliant on representative organisations to highlight any anticipated impacts. The EC evaluation noted that charities representing transgender or non-binary persons highlighted that a person's identification may not reflect their gender expression or identity.
- e. **Religion:** The 2021 survey found no statistically distinguishable difference in photo identification ownership by religion, however for some subgroups the base number of respondents was too low for reliable statistical comparisons to be made. Polling station staff will be given appropriate training and secondary legislation will include a requirement for privacy screens in polling stations to support voters from certain groups who may have specific issues with the act of confirming their identification, including people who wear face coverings for religious reasons who may not wish to remove their face covering in a polling station.
- f. **Employment status and educational qualifications:** Ownership of identification varies by employment status and educational qualifications. People with no qualifications, and people with Level 2 qualifications, were less likely to hold the accepted forms of identification (6% of people with no qualifications and 3% of people with Level 2 qualifications did not hold the accepted forms of identification). In addition, people who were unemployed were less likely to hold the accepted forms of identification, where 8% of people who were unemployed did not own any of the forms of identification.
- g. **Geographic location:** In addition to the potential impacts explored for protected characteristics, our survey found ownership of identification can vary by electors' location. People in the West Midlands and the South West were less likely to own the accepted forms of photo identification (4% of survey respondents in the West Midlands did not hold the accepted forms of photo identification, and 3% of respondents in the South West did not, compared to 2% overall). People in London were more likely than people overall to own accepted forms of photo identification (where 1% did not hold the accepted forms of photo identification).

408. Voter Cards themselves will be free, however, there may be time and financial costs to obtaining the identification through electors having to travel to apply and collect the identification, particularly if these are only available from one office in the LA, and to obtain any documents needed to obtain the identification. This could be particularly a concern to individuals living in rural areas, and for older people and those with dependents or other time commitments.

409. Communications which build on these findings will be key to successful implementation of the policy. The Electoral Commission will deliver a comprehensive and targeted communications campaign to raise awareness for the changes to the requirements at the polling station. Polling station staff will be given appropriate training and secondary legislation will include a requirement for privacy screens in polling stations to support voters from certain groups who may have specific issues with the act of confirming their identification as a result of protected characteristics. We will continue to work with civil society groups throughout the delivery of voter identification.

J.2 Absent Voting

410. There is some evidence that people in older age categories and/or with more limiting disabilities are more likely to vote by post and people in younger age categories are more likely to vote by proxy¹⁵⁰. Although there are no specific anticipated impacts, any impact will likely be disproportionately felt by these groups. The policy and any impacts it has on people with protected characteristics will be kept under review as the measures are implemented.

J.3 Online Absent Vote Applications

411. Ofcom's Communications Market Report 2020 highlighted that 13% of UK households are not online, with this figure increasing to 43% for those aged over 75¹⁵¹. Despite this, the introduction of online absent vote applications will not disproportionately impact elderly voters as they will still be able to make paper-based applications under the future system. However, this policy may benefit younger people with evidence suggesting that young people prefer online registration. The Electoral Commission in 2017 noted that '*online registration has been particularly popular among some groups who we know are less likely to vote...*'¹⁵². Furthermore, the same research found that over two-thirds (69%) of online applications received between 18 April 2017 and 22 May 2017 were from people under the age of 34, which further highlights how the introduction of this policy may cause more young people to vote absently.

412. There is limited evidence on the impact of online absent vote applications on ethnic minority groups in the United Kingdom. However, evidence in Arizona (in USA) indicates that minorities are more likely to use online registration¹⁵³. For example, African-Americans accounted for 2.2% of registered voters, but 5.4% of those who used the online system. The same figures were 1.9% vs 2.9% for Asians, and 26.9% vs 34% for Latinos. This would suggest that online registration may remove some barriers faced by non-English speakers and ethnic minorities in registering for an absent vote, although Monroe and Sylvester (2011) reported mixed results, which they attribute to the fact that the costs of applying for an absent vote are actually higher at the outset for this group due to difficulty in comprehending and completing the application.¹⁵⁴ A major limitation with this evidence is that it is not UK-specific, and there may be cultural differences between the voting behaviours of ethnic minorities in the UK and the USA.

J.4 Accessibility

413. The introduction of additional equipment is expected to have a positive impact on voters who have disabilities and this is likely to improve their overall voting experience.

¹⁵⁰ Electoral Commission Winter Tracker (2020), Electoral Commission (2019) 2019 UK Parliamentary General Election Survey

¹⁵¹ https://www.ofcom.org.uk/_data/assets/pdf_file/0026/203759/cmr-2020.pdf

¹⁵² [Electoral Registration at the June 2017 General Election](#)

¹⁵³ https://www.pewtrusts.org/-/media/legacy/uploadedfiles/pcs_assets/2010/onlinevoterregpdf.pdf

¹⁵⁴ Monroe and Sylvester, 2011, Who Converts to Vote-By-Mail? Evidence from a Field Experiment, <https://www.liebertpub.com/doi/full/10.1089/elj.2009.0058>

J.5 Overseas Electors

414. The policy framework for the previous Overseas Electors Bill was subject to a full public consultation and has formed the basis for this refreshed policy. Since then we have been engaging extensively with electoral community organisations: the Association of Electoral Administrators, the Electoral Management Board for Scotland, the EC, the Scottish Association of Assessors and Society of Local Authority Chief Executives, as well as electoral administrators, behavioural science and service design experts to consider the impact of potential changes as a result of the policy proposals. Northern Ireland specific impacts will be assessed against criteria in section 75 of the Northern Ireland Act 1998.
415. At this point, the main equality considerations have focused on provisions being made in primary legislation, which include changes to the franchise and also changes in the user journey for address verification and the registration renewal period for overseas electors. Equality considerations for these changes have focused on age and disability in particular, considering the ability for these groups, who may have reduced access to technology, reduced digital literacy¹⁵⁵ and cognitive decline¹⁵⁶ (age), as well as specific learning difficulties and impairments related, but not limited, to mobility, coordination, speech, vision and hearing¹⁵⁷ (disability), to provide supporting documentation and navigate a potentially more complex application process.
416. Changes made to the user journey (in order to facilitate the franchise change in a secure way) may make aspects of the registration process more complex for applicants. For example, to give effect to the franchise change, applicants who were last registered more than 15 years ago, or who have never been registered, can have their connection to a UK address verified by certain forms of documentary evidence. If they do not have this documentation, or fail to provide acceptable documentation, an ERO may check local records. If neither of these options are possible, the applicant will need to seek an attestation from an eligible attestor.
417. Increased complexity is likely to be a greater impact on elderly applicants who are more likely to suffer from age-related cognitive decline, which can affect speed of processing, working memory and cognitive functioning (decision making, problem solving) and are also likely to have lower digital literacy skills¹⁵⁸. The result may be early abandonment of applications to register, or inputting incorrect responses, which will require an electoral administrator to follow up. The provision of documentation may also introduce a 'pause' in the application process while applicants retrieve documents. Applicants facing cognitive decline may struggle to pick tasks back up where they left them. A pause may also block elderly applicants reliant on carers or family members for access to, or assistance using, technology or printing facilities, from completing the application in one sitting. We recognise that there may be a number of impacts that intersect across more

¹⁵⁵ [Age UK One Digital Programmes](#), 2019

¹⁵⁶ [Age UK Dementia and Cognitive Decline, a Review of the Evidence](#), 2014

¹⁵⁷ [Equality and Human rights commission](#), 2017

¹⁵⁸ [Age UK One Digital Programmes](#), 2019

than one protected characteristic. In this case complexity could also be an impact for applicants with specific learning difficulties.

418. Mitigations for this impact will focus on the user journey and online service design, ensuring user testing informs any messaging or signposting, ensuring WCAG AA accessibility standards¹⁵⁹ are met and that any changes to the online service meet the relevant accessibility design standards set by the Government Digital Service. Electors who need assistance completing either the paper-based or online registration process have the option of contacting the relevant electoral registration office. Paper application forms will still be available for anybody who prefers or requires them. The EC will retain responsibility for designing the paper forms.

419. We have also made early equality considerations for secondary legislation, being introduced at a later stage, specifically focusing on the accessibility of the documentation an applicant may need to provide at identity verification and address verification. Cabinet Office officials will work closely with the electoral community to develop a list of acceptable documentary evidence that is both accessible and meets the required security needs. Importantly, this list will be non-exhaustive, giving electoral administrators the flexibility and discretion to accept other forms of evidence not included in the list.

Boundary Changes

420. The Parliamentary Constituencies Act 1986 (as amended) sets out the date of the electoral data that will be taken into account at future boundary reviews. The independent Boundary Commissions will conduct their reviews on that basis. All registered electors, whether domestic or overseas, at a fixed date form part of the electorate and therefore part of the calculations for boundary reviews.

J.6 Campaigning Measures

421. The introduction of a new electoral sanction against political intimidation may lead to better political representation, particularly amongst those from protected groups. Political intimidation impacts a variety of groups such as:

- a. **Women:** Two thirds of women MPs say that progress on tackling abuse against women in politics impacts their willingness to stand for re-election¹⁶⁰.
- b. **People from ethnic minority backgrounds:** Other analysis has shown that MPs from ethnic minorities receive 15% more 'toxic' tweets than their white counterparts¹⁶¹.

422. Greater protection from intimidation as a result of the new electoral sanction could improve the representation of candidates who run for elective office as it removes one of the barriers faced by those with protected characteristics.

¹⁵⁹ [Web Accessibility Initiative](#), 2020

¹⁶⁰ [Parliamentary survey](#), November 2019

¹⁶¹ [Evolution AI](#)

J.7. Voting and Candidacy Rights of EU Citizens

423. These measures will have an impact on individuals as a result of their citizenship: they will remove or grant voting and candidacy rights from individuals on the basis of their citizenship. As a result of the changes some EU citizens living in the UK will no longer be able to vote and stand as candidates and as a consequence not being listed on the electoral register and could have their success of applying for loan or credit applications reduced. In addition, the changes could impact the civic engagement of these citizens, which has associations with individual outcomes like employment and health outcomes, and societal trust and reciprocity.¹⁶²
424. The policy changes will impact EU citizens, from EU Member States without a voting and candidacy rights agreement, migrating to the UK after the implementation period completion day.
425. There is no available demographic data for those individuals who would have otherwise chosen to register to vote amongst the EU citizens annually migrating to the UK. The closest comparable data is for all EU citizens in the UK or individuals born in EU countries and living in the UK.¹⁶³ Residents with EU citizenship are more likely to be younger than the overall resident population in the UK (an estimated 24% were aged 15-29 and 44% were aged 30-49 in 2017-18, compared to an estimated 19% and 26% respectively for the UK as a whole in 2017-18).¹⁶⁴ There are smaller differences by sex, disability and religion (the latter two using data of country of birth).¹⁶⁵ We were unable to identify data for gender reassignment, marriage, and maternity.

Devolution impacts

426. Responsibility for local and devolved elections in Wales and Scotland is devolved and there are already differences between local voting and candidacy rights in Wales and Scotland, and England and NI. Specifically, the Welsh and Scottish Governments recently legislated to allow all qualifying foreign citizens to stand and vote in elections for which they hold responsibility. The changes within this Bill will apply only to the franchise used for local elections in England and Northern Ireland and PCC elections in England and Wales.
427. Responsibility for the PCC franchise, including PCC elections in Wales, is not devolved. Currently, EU citizens over the age of 18 who are registered to vote in local government elections are able to vote in PCC elections, including in Wales. When these

¹⁶² Dr Rod Dacombe, Department of Political Economy, Kings College London– written evidence ([CCE0174](#)), Select Committee on Citizenship and Civic Engagement ‘The Ties that Bind: Citizenship and Civic Engagement in the 21st Century’

¹⁶³ Data in this section refers to citizens from all EU countries outside the UK, or citizens born in EU countries outside the UK. It does not exclude Ireland, Cyprus and Malta.

¹⁶⁴ Annual Population Survey estimates 2017-18, ([EU citizens](#); [UK population](#)).

¹⁶⁵ APS estimates for mid-2018 find an estimated 47% of [EU citizens](#) aged 15+ residing in the UK were male, and 53% were female, compared to an estimated 40% male and 60% female for all [UK residents](#) aged 15+. [Census data for 2011](#) finds 14% of residents in England and Wales born in the EU had a disability, compared with 18% of all other residents. [Census data](#) also suggests residents born in the EU and living in England and Wales are more likely to be Christian (70% compared with 59% of all other residents).

measures are commenced, some EU citizens will not be able to stand or vote in PCC elections, while continuing to be able to stand and vote in elections to the Welsh Parliament and to local authorities in Wales. The impact of this will be that new procedures will need to be created to produce the register of voters entitled to vote in PCCs and new guidance will need to be provided to electoral administrators and electors to clarify eligibility for PCC elections, because eligibility will differ from other local elections in Wales. This is not a new situation, as changes to the Welsh local government franchise to allow 16 and 17 year olds to vote in local authority and Welsh Parliament elections already mean that some electors can vote in Welsh Parliamentary and local authority elections, but not in PCC elections (where the minimum age remains 18).

J.8 First Past The Post

428. The Government does not consider that the proposed legislation is likely to have a negative impact on groups or individuals with protected characteristics. However, the simplicity of the FPTP system and its subsequent consistency with other election systems in England (and Wales in relation to PCC elections), could result in PCC and mayoral elections becoming more accessible for those with protected characteristics and the wider population.

K.A summary of the potential trade implications of measure

429. There are unlikely to be any direct trade implications as a result of this measure.

L. Monitoring and Evaluation

430. The monitoring and evaluation plans for the components of the Bill can be found in the table below.

Table 26: Summary of monitoring and evaluation plans for the Bill

	Monitoring	Evaluation
Voter identification	<p>The Cabinet Office will monitor the effectiveness and success of this policy, by monitoring against the policy objectives.</p> <p>It is anticipated that the following monitoring activities will take place during policy development and through into national rollout:</p> <p>Nationally representative survey: a survey to tap into awareness of voter identification requirements, access to identification and the</p>	<p>Exact plans for evaluating national rollout will need further scoping to determine scale and exact methodology. The Cabinet Office will be required to evaluate and report the impact of introducing voter identification at the first two UK Parliamentary General Elections and the first set of local elections. This will look at the methods listed under monitoring (nationally representative survey, polling station data, qualitative interviews and focus groups) as</p>

	<p>Voter Card provision across areas (including being representative across nations where the policy is devolved at local elections and the potential to add a sample boost for groups with protected characteristics such as ethnicity and disability). At a minimum this survey should be conducted before and after polls in the year of rollout.</p> <p>Polling Station Data: the requirement for LAs to capture data in the polling station on those electors that a) turnout to cast their vote with no identification, b) turnout to cast their vote with the wrong identification, c) turnout to cast their vote with suspected fraudulent identification, d) turnout with Voter Card, e) turnout with another form of accepted identification and f) those that later return with the correct identification and cast their vote successfully.</p> <p>Qualitative Interviews: semi-structured interviews with LAs before and after national rollout to capture information on delivery</p> <p>Focus groups: ahead of national rollout, focus groups will be carried out with groups (protected characteristics, LAs, Northern Ireland) to feed into the policy from an equality duty and delivery perspective.</p>	<p>well as relevant case studies and research themes (Integrity, Accessibility, Delivery) based on those addressed in the 2018 and 2019 CO evaluations of the Voter identification pilots.</p>
<p>Absent Voting</p>	<p>The Cabinet Office will monitor the effectiveness and success of this policy, by monitoring it against the policy objectives.</p> <p>This will be done through regular contact with LAs and the EC.</p>	<p>There are no statutory review clauses in the Bill to review this policy, however post-legislative scrutiny will be undertaken to better understand the long-term impacts of this policy. However, the EC, as an independent body, will be bound by its statutory responsibilities to report</p>

	<p>Further monitoring plans are under development and will be outlined at the secondary legislation stage.</p>	<p>on all of the electoral integrity impacts.</p> <p>Exact plans for evaluating national rollout will need further scoping to determine scale and exact methodology, but it is anticipated that absent voting measures will be evaluated as a minimum in the year of national rollout and initial years following the first UKPGE post the introduction of these Bill measures.</p>
<p>Online Absent Vote Applications</p>	<p>The Cabinet Office will monitor the effectiveness and success of this policy, against the key policy objectives set out in section B.</p> <p>This will be done through regular contact with the LAs and the EC.</p> <p>Further monitoring plans are under development and will be outlined at the secondary legislation stage.</p>	<p>There are no statutory review clauses in the Bill to review this policy, however post-legislative scrutiny will be undertaken to better understand the long-term impacts of this policy. Furthermore, the EC, as an independent body, will be bound by its statutory responsibilities to report on all of the electoral integrity impacts.</p> <p>Exact plans for evaluating national rollout will need further scoping to determine scale and exact methodology, but it is anticipated that online absent vote applications will be evaluated as a minimum in the year of national rollout and initial years following the first UKPGE post the introduction of these Bill measures.</p> <p>Therefore plans for post-legislative scrutiny will be detailed as part of the secondary legislation and service design development in order to consider these areas fully in these plans.</p>

<p>Accessibility</p>	<p>The Cabinet Office will monitor the effectiveness and success of this policy, by monitoring it against the policy objectives.</p> <p>This will be done through regular contact with LAs, the EC, The AEA, disability charities and other relevant stakeholders.</p> <p>Further monitoring plans are under development and will be outlined at the secondary legislation stage.</p>	<p>There are no statutory review clauses in the Bill to review this policy, however post-legislative scrutiny will be undertaken to better understand the long-term impacts of this policy. However, the EC, as an independent body, will be bound by its statutory responsibilities to report on all of the electoral integrity impacts</p> <p>Exact plans for evaluating national rollout will need further scoping to determine scale and exact methodology, but it is anticipated that accessibility measures will be evaluated as a minimum in the year of national rollout and initial years following the first UKPGE post the introduction of these Bill measures.</p>
<p>Overseas Electors</p>	<p>The Cabinet Office will monitor the effectiveness and success of this policy, by monitoring it against the policy objectives set out in section B.</p> <p>This will include monitoring:</p> <ul style="list-style-type: none"> - the number of registration applications from British citizens living overseas. - trust and satisfaction in the electoral system. - the additional burden on local government of maintaining a larger franchise. <p>Further monitoring plans are under development and will be outlined at the secondary legislation stage.</p>	<p>There are no statutory review clauses in the Bill to review this policy, however post-legislative scrutiny will be undertaken to better understand the long-term impacts of this policy. However, the EC, as an independent body, will be bound by its statutory responsibilities to report on all of the electoral integrity impacts.</p> <p>The Cabinet Office’s monitoring plans outline the key metrics to be used to track the changes to who is entitled to register and vote being made by this Bill via primary legislation.</p> <p>However much of the detail of the overseas electors changes, such as changes to the application process, the overseas declaration, identity verification, address verification and registration renewal will be in secondary legislation, and in the subsequent service design.</p>

		Therefore plans for post-legislative scrutiny will be detailed as part of the secondary legislation and service design development in order to consider these areas fully in these plans.
Campaigning Measures	<p>The Cabinet Office will monitor the effectiveness and success of this policy, against the key policy objectives set out in section B.</p> <p>This will be done primarily through regular engagement with the EC and consideration of relevant available data.</p> <p>Further monitoring plans are under development and will be outlined at the secondary legislation stage.</p>	<p>There are no statutory review clauses in the Bill to review this policy, however post-legislative scrutiny will be undertaken to better understand the long-term impacts of this policy. However, the EC, as an independent body, will be bound by its statutory responsibilities to report on all of the electoral integrity impacts</p> <p>The Campaigning Measures are a suite of measures aimed at improving the integrity of the campaigning process. Therefore, some areas will be more impactful on the wider process, whilst other changes may be more technical.</p> <p>Therefore the Cabinet Office will endeavour to take a proportional approach to evaluating Campaigning Measures as a whole.</p>
Voting and Candidacy Rights of EU Citizens	<p>The Cabinet Office will monitor the effectiveness and success of this policy, against the key policy objectives set out in section B.</p> <p>This will include monitoring:</p> <ul style="list-style-type: none"> - the number of registration applications made by eligible EU citizens. - the additional burden on local government of implementing the changes. 	<p>There are no statutory review clauses in the Bill to review this policy, however post-legislative scrutiny will be undertaken to better understand the long-term impacts of this policy. However, the EC, as an independent body, will be bound by its statutory responsibilities to report on all of the electoral integrity impacts.</p>

		The Cabinet Office's monitoring plans outline the key metrics to be used to track the changes.
First Past The Post	<p>The Cabinet Office will monitor the effectiveness and success of this policy, against the key policy objectives set out in section B.</p> <p>This will be done through regular contact with the LAs and the EC.</p> <p>Further monitoring plans are under development and will be outlined at the secondary legislation stage.</p>	<p>There are no statutory review clauses in the Bill to review this policy, however post-legislative scrutiny will be undertaken to better understand the long-term impacts of this policy. Furthermore, the EC, as an independent body, will be bound by its statutory responsibilities to report on all of the electoral integrity impacts.</p>