

Title: Representation of the People Bill Impact Assessment IA No: Lead department or agency: Ministry of Housing, Communities & Local Government Other departments or agencies: N/A	Impact Assessment (IA)			
	Date: July 2026			
	Stage: Bill			
	Source of intervention: Domestic			
	Type of measure: Primary Legislation			
Contact for enquiries: electionsresearchanalysismailbox@communities.gov.uk				
Summary: Intervention and Options			RPC Opinion: N/A	

Cost of Preferred (or more likely) Option (in 2025 prices)			
Total Net Present Social Value	Business Net Present Value	Net cost to business per year	Business Impact Target Status
-£85.9m	£0	£0	£0

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

Democratic engagement is waning. Millions of eligible electors are either incorrectly registered or not registered at all. Increased security threats, cases of harassment and intimidation, and concerns around foreign interference, have undermined trust in politics and contributed to reduced confidence in our political system. Without reform, there is a risk that trust in the democratic process worsens, undermining participation and representation, and that our electoral system remains susceptible to evolving risks. To safeguard our democracy and ensure community empowerment, the electoral system must be strengthened. Government intervention is necessary to build this resilience and reduce risks of delivery failure, as it holds the legislative power to improve electoral administration and campaign regulation, thereby restoring public confidence, enhancing democratic engagement, and ensuring votes genuinely reflect individuals' voices and perspectives.

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

The interventions aim to strengthen democracy and reinforce the resilience of our electoral system through:

- Broadening democratic engagement
- Reducing the major risks in election delivery, electoral registration, electoral campaigning and political finance
- Removing barriers to participation in democracy

Intended outcomes include improving accuracy and completeness of electoral registers, expanding participation among young voters by lowering the voting age to 16, reducing barriers to voting, protecting the UK's democracy from foreign interference, closing loopholes in political finance, reducing harassment in politics, ensure fairness and enhancing the resilience in our electoral system. Ultimately, these interventions seek to underpin public trust in our democracy.

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

A range of options have been considered to strengthen democratic participation and safeguard electoral integrity:

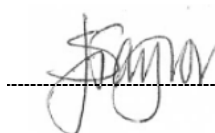
- **Do nothing:** This option risks weakening trust in the democratic process and reductions to participation and representation, and leaves the electoral system exposed to evolving risks.
- **Non-legislative approach:** For example, this could include a democratic engagement programme, increased communications or provision of guidance. However, these interventions alone would not be sufficient to tackle underlying issues facing the electoral system. As this option does not meet strategic objectives, it was rejected.
- **Legislative approach (preferred):** This option augments non-legislative with legislative changes including lowering the voting age, transforming registration practices and allowing the use of in-date UK-authorized bank cards as a form of ID for voting. Unlike the other options, this option will deliver the policy objectives by tackling the systemic issues facing the electoral system, and is necessary to ensure the government delivers its manifesto commitments.

Will the policy be reviewed? Yes, see section L.

Is this measure likely to impact on international trade and investment?		No		
Are any of these organisations in scope?	Micro No	Small No	Medium No	Large No
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)		Traded: N/A		Non-traded: N/A

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

Signed by the responsible Minister:



Date:

1st Sept 2026

Summary: Analysis & Evidence**Option: Do nothing****Description: FULL ECONOMIC ASSESSMENT**

Price Base Year 2025	PV Base Year 2025	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: 0	High: 0	Best Estimate: 0

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

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

There are no monetised costs resulting from this option.

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

1. Failure to meet the Government's objective to strengthen democracy and reinforce the resilience of our electoral system and deliver manifesto commitments.

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'

There are no monetised benefits resulting from this option.

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

There are no non-monetised benefits resulting from this option.

Key assumptions/sensitivities/risks	Discount rate (%)	N/A
Not applicable.		

BUSINESS ASSESSMENT (Option: Legislative Approach)

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**Option: Legislative Approach****Description: FULL ECONOMIC ASSESSMENT**

Price Base Year 2025	PV Base Year 2025	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: -43.0	High: -128.9	Best Estimate: -85.9
COSTS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)	
Low	0		6.5	56.3	
High	0		19.6	112.7	
Best Estimate	0		13.1	169.0	
Description and scale of key monetised costs by ‘main affected groups’					
1. Votes at 16 - this policy is estimated to produce an economic cost of £88.1m.					
2. The Electoral Commission and Enforcement - this policy is estimated to produce an economic cost of £13.3m.					
3. Improving Registration - this policy is estimated to produce an economic cost of £5.2m.					
Other key non-monetised costs by ‘main affected groups’					
1. Practical challenges of implementing new registration systems – including resource investment to develop and maintain infrastructure and train staff.					
2. Added complexity of voter ID checks – Allowing bank cards to be used as identification in polling stations but restricting the policy to in-date UK-authorized cards, could introduce complexity and cause confusion for electors and electoral administrators.					
3. Concerns of personation – Allowing bank cards to be used as voter ID may raise public concerns about the risk of personation, but if there is, any actual incidence is expected to be very low. This is considered a proportionate risk in order to ensure that no legitimate elector is prevented or discouraged from voting due to ID requirements.					
4. Potentially diminished value of open register – Should a large proportion of electors choose not to opt-in, the dataset may be too limited to retain its current utility, which may diminish its value for businesses. However, completeness of the open register has already been in decline over recent years.					
BENEFITS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)	
Low	0		1.6	13.4	
High	0		4.7	26.8	
Best Estimate	0		3.1	40.2	
Description and scale of key monetised benefits by ‘main affected groups’					
1. Absent Voting - this policy is estimated to produce a net economic benefit of £21.4m.					
Other key non-monetised benefits by ‘main affected groups’					
1. Building a long lasting engagement with our democracy. Engaging voters early will build the foundations for their participation in democracy. There is evidence this could close the participation gap for younger voters and build lifelong voting habits, if introduced alongside the right conditions.					
2. Improving the completeness and accuracy of the electoral registers. This could result in more people being correctly registered at their current address and a higher percentage of eligible people being registered overall, ensuring a greater proportion of the population has the opportunity to exercise their democratic right to vote.					
3. Minimising the possibility that legitimate electors are prevented or discouraged from voting by ID requirements. Amending the list of accepted documents, should address concerns that current voter ID requirements may pose a barrier for some electors and make it easier for eligible voters to meet the requirements when voting in polling stations.					
4. Minimising the possibility that any individual is discouraged from participating in democracy due to harassment or intimidation. This will contribute to candidates, candidates, campaigners and elected officeholders feeling safer and being able to more effectively participate in elections and political debate without fear of intimidation.					
5. Reducing the risk of foreign interference in our democratic processes by making it harder for malign actors to subvert the rules around donations to political parties. This will help to safeguard the integrity of elections by enhancing transparency and accountability around donation and in turn restore public trust in political financing.					
Key assumptions/sensitivities/risks				Discount rate (%)	3.5
Elector behaviour is difficult to predict and there is a lack of evidence as to how electors’ behaviour will be impacted by the implementation of the policy changes. The costs and outcomes of the votes at 16 and improving registration policies will be impacted by the completeness of the electoral register for 16- and 17-year-olds and for the general population respectively. As these assumptions are uncertain, sensitivity analysis has been conducted to demonstrate the impact on outputs. The headline EANDCB does not include the diminished value of open register as this is classified as a second order effect.					

BUSINESS ASSESSMENT (Option: Legislative Approach)

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

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A. Problem under consideration and rationale for intervention

1. **Elections are the cornerstone of a healthy democracy, providing citizens with a direct means to steer the future of the country.** With over 48 million registered voters in the UK¹, even small changes to electoral policy can have significant aggregate impacts. However, the effects on individual voters are often more nuanced, reflecting variations in personal circumstances and how different groups interact with the electoral system. For this reason, throughout this Impact Assessment (IA), we have sought to present the effects of proposed changes at both the aggregate and individual level.
2. **Undermining of public trust in politics has led to reduced confidence in our political system.** While the UK's strong democratic systems and institutions are rightly regarded worldwide as a model of democracy and the right to participate in democracy is a defining aspect of our national identity, evolving security risks, ever-increasing levels of intimidation and harassment, and concerns around foreign interference all contribute to this undermining of trust.
3. **The Government has a clear aim to strengthen democracy and reinforce the resilience of the UK's electoral system.** Strengthening and upholding the integrity of our elections is vital to ensure the needs of all people are fairly represented and considered. Broadening and deepening engagement in the democratic process is necessary to ensure a wide range of voices are properly heard and considered.
4. **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 (EROs) and Returning Officers (ROs), voters, political campaigners and the Electoral Commission (EC).

A.1 Votes at 16

5. **Our democracy must reflect modern society and empower young people.** Young people are the future of our society, and are engaged and focused on the key issues affecting our country both domestically and internationally. Lowering the voting age will give young people a chance to have their say on issues that affect them on a local and a national level, empowering them to play an active role in shaping their future.

¹ [Electoral statistics, UK - Office for National Statistics, 2021](#)

6. **There is a participation gap in our democratic processes, with levels of completeness for voter registration increasing with age. According to data from 2022, compared to other age groups,** completeness of electoral registers is lowest for current attainers aged 16-17². According to a report by IPSOS³, a broadly similar pattern appeared in the 2024 United Kingdom Parliamentary General Election (UKPGE) as compared to previous elections, of lower turnout among younger people. While turnout estimates are uncertain and based off surveys rather than actual turnout data, they indicate that the estimated turnout for those aged 18–24 (37%) was almost half that of those aged 65 and over (73%). This proposed franchise change could create a more engaged electorate and could even lead to an increase in turnout over time⁴. Thus, by supporting younger voters to participate in elections early, we expect to build the foundations for their lifelong participation in our electoral processes and reduce the voter registration gap.
7. **Reducing the voting age for all elections will bring consistency in voting age across the UK.** Scotland and Wales have already enfranchised 16- and 17-year-olds in devolved elections. This change to the franchise will improve consistency across the UK. Scotland permanently lowered the voting age to 16 for devolved elections in 2015, having first lowered the voting age for the Independence Referendum in 2014⁵. Wales lowered the voting age in 2020, with the first Senedd election for that franchise occurring in 2021⁶. A range of further jurisdictions have successfully lowered the voting age to 16, including the Isle of Man, Jersey and Guernsey, and Austria.

A.2 Improving Registration

8. **An estimated 7-8 million eligible electors are either incorrectly registered or not registered to vote.** While the current registration system works well, achieving around 86% completeness and 88% accuracy across Great Britain (GB) (83% and 86% respectively in Northern Ireland)², there are clear opportunities to improve this and close the gap. There is evidence that some citizens find certain aspects of the system confusing, and some even assume that they are on the electoral register because they have used other government services and their information will have been passed on⁷.
9. **There is currently insufficient join up of government services or data sharing,** and no real consideration of the Government's blueprint for a modern digital government, to enable better use of data and services. Eligible citizens are unable

² [Electoral registers in the UK - Electoral Commission, 2023](#)

³ [How Britain voted in the 2024 election – Ipsos, 2024](#)

⁴ See section F.1.3.3 for discussion of the evidence around turnout.

⁵ [Votes at 16 in Scotland - Eichhorn and Hübner, 2022](#)

⁶ [A False Start - Griffiths, Lerner, Jones and Poole, 2025](#)

⁷ [Is it time for Automatic Voter Registration in the UK? - Joseph Rowntree Reform Trust, 2020](#)

to be invited or reminded to apply to register or update their details when they interact with other services run by government. Current legislation also hinders the ability of EROs to identify people who are incorrectly registered or not registered at all, as it can be misinterpreted and does not allow for proactive sharing of relevant data by departments and public bodies.

10. **Steps need to be taken to identify and support the registration of groups who are less likely to be registered accurately.** A recent report by the EC⁸ identified that these groups include young people, people living in rented accommodation and those who have recently moved. Moreover, length of residence at an address and age are the variables most associated with differences in completeness in GB and Northern Ireland. These factors are related, as young people are also more likely to be frequent movers (and therefore likely to live at an address for less than one year). There are also barriers for EROs in the voter registration system that increase ERO's workload or don't facilitate successful or accurate registrations. This includes managing duplicate applications and high volumes of applications in the run up to an election.
11. **Current registration processes are hindered by outdated requirements that mandate a written application (digital or otherwise), preventing the adoption of more automated and efficient systems.** Changes are necessary to enable the exploration and testing of more automated registration systems - including a process whereby individuals are registered without needing to apply, or give consent for data which they have already provided to be used as part of their application to register to vote. Countries like Canada and Australia have successfully implemented similar systems, demonstrating the potential benefits of this approach.
12. **The current opt-out system of the open register is unfit for purpose.** While access to the full electoral register is strictly controlled, the edited or 'open' register is available for sale to anyone and the data in it may be used for any legitimate purpose⁹. The EC has previously stated that the current 'opt-out' system should be replaced with one that allows electors to 'opt-in'¹⁰. The AEA have also stated how the sale of the open register appears incompatible from a citizen's perspective and could deter potential electors from registering by the prospect of having their details sold on¹¹. Shifting from an opt-out to an opt-in model will also support the phased introduction of direct registration, an automated process that enables eligible individuals to be added to the electoral register without needing to actively apply.

⁸ [Electoral registers in the UK - Electoral Commission, 2023](#)

⁹ [Electoral registers and access to them. July, 2025.](#)

¹⁰ [Transcript of oral evidence - Political and Constitutional Reform Committee, 2014](#)

¹¹ [Response to the UK Parliament Committee Inquiry on Electoral Registration call for evidence - The Association of Electoral Administrators, 2023](#)

The shift also will provide additional safeguards against anyone's details appearing in publicly-available sources without their consent.

13. **Electoral registration provisions for anonymous electors (AEs) are outdated and need updating.** As it stands, upon successful application, AE status only remains valid for one year, so AEs are required to re-register annually. This places a disproportionate burden on AEs compared to non-AEs. While this policy may have been appropriate in 2006, when electoral registers were recreated annually based on the annual canvass, it is less appropriate today following the introduction of individual electoral registration and year-round online registration.

A.3 Voter ID

14. **Voters in the UK are required to show photographic documents as a means of identification at polling stations.** This requirement was introduced through the Elections Act 2022 and first implemented at the May 2023 local elections. Voters can use a number of different forms of IDs and if they do not have one of these, they can apply for a Voter Authority Certificate (VAC), available free of charge from their LA, or may choose to vote by post or proxy.
15. Despite data collected following the implementation of the policy showing that the majority (84%) of electors are aware of the requirements, **0.25% of people who tried to vote at a polling station at the 2024 UKPGE were initially turned away due to lack of accepted ID¹².** Around two-thirds of those people returned later in the day with an accepted form of ID and were able to vote. However, these statistics only record electors who were turned away at the polling station desk – they do not include electors who turned away at an earlier point in time or were dissuaded from voting. Research from public opinion surveys conducted after the UKPGE found that **3-4% of non-voters cited the voter ID policy as a factor in why they did not vote**, suggesting a higher number of electors have been impacted.¹³
16. **The provision of the VAC ensures all electors have an option to meet the ID requirements, free of charge, but uptake and awareness remain low.** Awareness of the VAC among the overall population and among those who said they did not already have photo ID is reported as 58% and 57% respectively. The overall number of VACs applied for is low (210,000) compared with the estimated number of eligible, registered voters who might need it and not have any other accepted ID (around 750,000)¹². Therefore, there remains a small proportion of the electorate that does not hold an accepted form of ID. For those electors the requirements are therefore creating a barrier which could lead to some electors being unable to vote or be dissuaded from doing so.

¹² Voter ID at the 2024 UK general election - Electoral Commission, 2024

¹³ Voter ID at the 2024 UK general election - Electoral Commission, 2024; Evaluation of Electoral Integrity Programme: public opinion research wave 3 – MHCLG, 2025

17. **The enfranchisement of 16- and 17-year-olds will also need to be considered in the context of the Voter ID policy.** Initial evidence published by the Department for Education (DfE) on public school pupils and college learners in England shows that this group has lower rates of ownership of passports and driving licences, two of the main items used by 18+ voters¹⁴. Given 16- and 17-year-olds are ineligible for some of the accepted documents and may have less need to prove their identity in general, it is likely they will have a lower incidence of holding documents that could be used as ID overall and so may similarly face this barrier to voting.

A.4 Candidate ID and Nomination Changes

18. **The current nominations process does not require candidates to provide proof of identity, nor does it include a clear statutory declaration that all information provided is truthful.** While it is a criminal offence to knowingly make a false statement on nomination papers, the existing forms do not make this sufficiently clear to candidates. This has raised concerns about the integrity of the nominations process and the potential for fraudulent or misleading nominations, particularly in light of recent cases where candidates have used tactics such as name changes to test the system and interfere with our democratic processes.
19. **The Speaker's Conference and some stakeholders have highlighted the need for stronger behavioural signals and clearer accountability mechanisms within the nominations process.** Government intervention is necessary to strengthen the legal and procedural framework around candidate nominations, ensuring candidates are fully aware of the consequences of providing false information and enabling proportionate safeguards against impersonation or deception.

Withdrawal of Political Party Support for Nominations

20. **Under current electoral law, once a candidate is validly nominated with a party description and emblem, that nomination is fixed unless the candidate themselves withdraws before the statutory deadline.** There is no mechanism for a political party to formally withdraw its support or amend the nomination after submission, even if serious concerns about the candidate arise during the nomination period.
21. **This legal position creates reputational risks for political parties and risks misleading voters who may unknowingly vote for candidates no longer supported by the party.** It also limits parties' ability to uphold standards and respond to emerging issues during the nomination period. By introducing a statutory mechanism allowing political parties to revoke their nomination of a

¹⁴ Parent, pupil and learner voice: March 2025 - DfE, 2025

candidate up to a defined point before the close of nominations, this intervention is expected to provide greater transparency, protect party reputations, and uphold public confidence in the democratic process.

A.5 Outcomes of the Elections Review

22. **The Review of Electoral Conduct and Registration¹⁵ was commissioned in October 2024 in response to growing pressures on the electoral system.** These pressures include the increasing complexity of electoral law, rising demand for postal voting¹⁶, and the operational challenges posed by unscheduled elections. Together, these factors have placed significant strain on ROs, EROs, and the wider electoral infrastructure. **Without intervention, there is a risk that pressures could increase the likelihood of administrative errors, undermine the timely and effective delivery of elections and reduce voter confidence.**
23. **The Review identified several specific issues requiring attention including inefficiencies in the postal vote process, burdensome registration procedures and challenges with high levels of registration and absent vote application activity in the lead up to polls.** It also highlighted challenges in securing polling venues, recruiting polling station staff, and ensuring that ROs have access to the resources they need. These issues affect LAs, electoral suppliers, and electors and if left unaddressed, they could lead to delays, increased costs, and reduced participation. The key recommendations that require primary legislation and are therefore in scope of this Impact Assessment are as follows:
 - i. Electoral timetable
 - ii. Absent voting¹⁷
 - iii. Electoral resourcing
 - iv. Elector information power
 - v. Election forms consolidation measures
24. **The Review's recommendations are based on extensive engagement with key stakeholders who provided practical insights into the day-to-day challenges of running elections, helping to shape realistic and deliverable proposals.** The Government is best placed to act on these findings, using its legislative and convening powers to implement reforms that will strengthen the system and support those responsible for delivering elections. Sector experts consulted include the EC, the Association of Electoral Administrators (AEA), Society of Local Authority Chief Executives (SOLACE), and electoral administrators across the UK, including the

¹⁵ [Letter from Minister Norris to the electoral sector - MHCLG, 2024](#)

¹⁶ [General Election 2005 - Mellows-Facer, 2006](#), [Results and turnout at the 2015 UK general election - Electoral Commission, 2019](#), [2024 UK Parliamentary general election and the May 2024 elections - Electoral Commission, 2024](#)

¹⁷ Throughout this Impact Assessment, absent voting measures from the review are discussed in the Absent Voting sub-sections, alongside absent voting measures that did not originate from the review.

Electoral Management Boards in Scotland and Wales and the Electoral Office for Northern Ireland.

25. **Coordinated Government intervention is necessary to address these challenges and to ensure consistency, fairness, and resilience across the electoral system.** While some LAs have introduced their own mitigations, such as register checkers or email communications, these efforts are inconsistent and cannot resolve systemic issues - such as the legal constraints around postal vote reissue. Many of the solutions require legislative change, national coordination, or access to central data systems.
26. **Many electors struggle to access clear, consistent, and relevant information about elections,** with 30% of voters reporting seeing misleading or inaccurate information about electoral processes at the recent UKPGE¹⁸. Electors often rely on multiple, inconsistent sources such as social media, or word of mouth which leads to confusion, reduced confidence, and in some cases, disengagement from voting. To address this, the Government plans to legislate for a duty on ROs and EROs to provide standardised election data to the EC or the Government. This will support the provision of timely, accessible, and impartial information to electors, and reduce the burden on local administrators.
27. **The rules for different types of polls are set out in various separate and or interconnected pieces of legislation** each with its own set of forms (poll cards, ballot papers, nomination papers etc). A minor amendment results in duplication across legislation which is inefficient and time consuming. These measures would allow all prescribed forms to be amended via a single statutory instrument.

A.6 Absent Voting

28. **Postal voting is now a major part of our elections, with over a quarter of votes at the 2024 General Election cast by post.** However, the Electoral Commission¹⁹ have highlighted that some voters did experience problems which stemmed from various issues, including an increase in absent vote applications close to the deadline, supply chain and administrator resources, and a lack of public awareness of the timing of postal vote delivery and the availability of proxy voting.
29. **Growing demand is placing pressure on local election teams and the supply chain, including specialist suppliers and postal services, and the current absent voting framework does not always provide sufficient flexibility to respond effectively to exceptional circumstances.** The system must be adapted to meet rising expectations and ensure every eligible vote can

¹⁸ [2024 UK Parliamentary general election and the May 2024 elections - Electoral Commission, 2024](#)

¹⁹ [2024 UK Parliamentary general election and the May 2024 elections - Electoral Commission, 2024](#)

be cast and counted. The planned changes respond directly to recommendations made by the Electoral Commission²⁰ and the Association of Electoral Administrators²¹ and will help ensure the system is fair, flexible and fit for the future.

30. **In addition, the three-year postal voting maximum term has created significant additional administrative burdens for both electors and electoral administrators.** The current framework can also result in postal voting arrangements being unintentionally shortened where electors reapply before their existing arrangement expires. Together, these issues have reduced the efficiency of the absent voting system.

A.7 Harassment and Intimidation

31. **Harassment and intimidation in public life has been a long-standing issue.** The last UKPGE campaign saw unacceptable harassment and intimidation towards candidates, campaigners and electoral staff. The EC's post-poll report¹⁸¹⁸ following the UKPGE found that over half of candidates who responded to their survey (55%) felt that they had experienced some kind of problem with harassment, intimidation or abuse. Moreover, a third of respondents were intimidated or intentionally made to feel unsafe at least once during the campaign.
32. **There is a lack of a deterrent towards those who may seek to intimidate electoral officials.** A 2017 report²² by the Committee on Standards in Public Life (CSPL) led to the introduction of the disqualification order, and refined the undue influence offence. Whilst the disqualification order is a crucial part of tackling intimidation and harassment, as a lone deterrent it does nothing to prevent those who have no interest in standing as a candidate from intimidating or harassing candidates, campaigners or electoral staff.
33. **The publishing of candidate and member home addresses poses a security risk.** This can affect whether people choose to stand for election when they intend to act as their own election agent. The ability for candidates acting as their own election agent to provide a correspondence address instead of their home address will provide further protection for candidates and will also help to ensure that no one is discouraged from participating in our democracy.

A.8 Political Finance

34. Whilst there is no indication that UK politics is awash with illegitimate money, **there is compelling evidence of the foreign interference threat to UK democratic processes.** Evidence includes:

²⁰ [2024 UK Parliamentary general election and the May 2024 elections - Electoral Commission, 2024](#)

²¹ [New Blueprint for a Modern Electoral Landscape – Association of Electoral Administrators, 2025](#)

²² [Intimidation in Public Life - Committee on Standards in Public Life, 2017](#)

- Intelligence and Security Committee's (ISC's) Russia Report²³ identified several Putin-linked members of the Russian elite donating to UK political parties. The Government previously assessed that it was "almost certain that Russian actors sought to interfere in the 2019 UKPGE".
- The ISC's China Report²⁴ also warned of China's intent to interfere with the UK Government and influence political thinking and decision-making, with individuals receiving "funds from overseas sources for onward donation to political parties, prospective Parliamentary candidates". This evidence highlights how UK elections almost certainly represent attractive targets for malicious actors.

35. **This evidence makes the case for addressing the vulnerabilities in the system by making specific enhancements** to the existing controls on donors and recipients of donations to narrow the opportunity for subverting existing rules. This has been recommended by stakeholders including the EC, who have emphasised the need to strengthen the controls around donations and powers of regulators to improve the resilience against foreign influence.
36. Key electoral stakeholders including the EC, CSPL, and campaign organisations, such as Spotlight on Corruption (SPoC) argue that **the current permissibility test of a company "carrying on business" in the UK exposes political parties and other recipients to the risk of accepting foreign money and proceeds of crime**. To remedy this, CSPL and other stakeholders have recommended requiring companies who wish to donate to link their profits to the UK.
37. **The permissibility checks which recipients are required to carry out on donors are lagging behind** the more stringent anti-money laundering and know-your-customer obligations in corporate and charity sectors. The EC, CSPL, National Crime Agency (NCA) and SPoC have all called for introducing know-your-donor requirements to ensure that parties are attuned to the risk of foreign interference and know where their donations are coming from.
38. **The EC and the CSPL have identified unincorporated associations (UAs) as potential vehicles for foreign or otherwise illegitimate money to enter electoral campaigns** and therefore as a point of vulnerability in the political finance framework. Recommendations have been made to introduce tighter rules on UAs to address these risks.

²³ [Russia - Intelligence and Security Committee of Parliament, 2020](#)

²⁴ [China - Intelligence and Security Committee of Parliament, 2023](#)

39. **The Government commissioned an independent review into countering foreign financial influence and interference into UK politics.** That review made its recommendations in March, including a number of suggestions for our political finance regulation, and the enforcement of it, could be strengthened. We are delivering a number of those recommendations through this Bill.

A.9 The Electoral Commission and Enforcement

40. The EC is the independent statutory body responsible for overseeing elections and regulating political finance, and therefore responsible for enforcing certain breaches of the political finance framework relating primarily to offences committed by political parties, third party campaigners and permitted participants in referendums. **The enforcement regime is currently uneven, fragmented and lacks a proportionate and effective deterrent for offences.** This undermines effective regulation, and it is potentially damaging to public confidence for offences to be seen to either go unpunished or for proportionate action not to be taken. Additional reforms to the role and powers of the EC are needed to strengthen enforcement of the framework and maximise the impact of the reforms to the political finance framework outlined above.
41. **There is an ‘enforcement gap’ in the political finance framework, resulting in certain breaches of the rules often being left unaddressed and unsanctioned.** The EC has been able to impose civil sanctions since 2010 for breaches committed by parties, third-party campaigners, and permitted participants in referendums. However, breaches by candidates, local third-party campaigners, and accredited campaigners at recall petitions can only be investigated by the police and referred for criminal prosecution. As criminal prosecution is often considered disproportionate or not in the public interest, these breaches frequently go unpunished.
42. **The fining powers of the EC are deemed insufficient to be an effective deterrent.** The maximum fine that the EC can apply to punish breaches of the Political Parties, Elections and Referendums Act (PPERA) is £20,000 per offence (up to £10,000 for certain offences committed in Scotland and £5,000 in Northern Ireland). Numerous key stakeholders have described the current maximum fine as an inadequate deterrent that is seen by some campaigners as a “cost of doing business”.
43. **The EC lacks an explicit reciprocal statutory gateway to share information with other regulators and law enforcement** which makes information sharing burdensome and impedes cross-regulatory cooperation.
44. **The EC has advised that the need for campaigners to seek leave from courts to pay late invoices adds unnecessary complexity and bureaucracy, thereby**

impeding administrative efficiency and effectiveness, noting that most late claims are for simple administrative reasons.

45. **The criminalisation of administrative breaches can deter volunteers from participating in election campaigns.** Some administrative requirements, such as failing to submit statutory expenditure reports on time, carry the possibility of criminal prosecution. While prosecution is unlikely in practice, the EC and the CSPL have expressed concerns that criminalising these minor breaches may have a ‘chilling effect’ on participation by deterring volunteers from participating in election campaigns.
46. The EC has a statutory duty to “monitor, and take all reasonable steps to secure, compliance with” political finance rules under PPERA. **Current restrictions on the EC’s powers to require documents, information, and explanation outside of an investigation limit the EC’s ability to effectively discharge this duty.** Currently, the EC can only require disclosure outside of an investigation from specified regulated entities. As highlighted in recommendation 10 of the Rycroft Review, the EC’s inability to require disclosure of relevant material from third parties (e.g. banks, social media companies) relating to the finances of regulated entities outside of an investigation: (1) frustrates the EC’s ability to independently verify the income and expenditure of regulated entities in real time *and* (2) determine whether an offence may have been (or be in the process of being) committed that requires investigation or other regulatory action.

A.10 Imprints

47. Imprint rules play an important role in upholding trust in our democratic process by ensuring electors can see clearly who is behind political campaigning material. While these rules have improved the transparency of campaigning material, **there remain transparency gaps and the split of enforcement responsibilities between the police and the EC is unnecessarily complicated.**
48. **A loophole in the current rules allows third-party campaigners who are not recognised to disseminate potentially influential digital content without disclosing its origin.** This is because these organisations, who do not field candidates and spend below the £10,000 notification threshold, are not registered with the EC and therefore not subject to the same transparency requirements. This is particularly concerning when such material is designed to be shared virally, especially if it is misleading, controversial, or intended to manipulate public opinion without accountability.
49. **The EC is unable to make minor corrections to its digital imprint guidance quickly.** This is due to restrictive legal requirements, including the need for

Secretary of State approval and a 40-day parliamentary procedure for any revisions to guidance.

50. **The current division of responsibility for enforcing imprint rules, split between the police and the EC depending on the purpose of the material, creates confusion for both campaigners and enforcement bodies.** This fragmented approach can lead to uncertainty and inconsistency in enforcement. Moreover, the possibility of criminal investigation and prosecution may be disproportionate, particularly for volunteers and first-time candidates, and can discourage participation. Streamlining enforcement so that the EC takes primary responsibility for all imprint offences would bring greater clarity, consistency, and proportionality to the regime.

A.11 Northern Ireland Measures

The Northern Ireland canvass

51. **The existing canvass regime in Northern Ireland is unfit for purpose.** The current system requires that the register be recreated from scratch every 10 years and specifies that electors must re-register as part of the canvass to remain on the register, in spite of there being evidence to show that they remain eligible. This creates the risk that a significant number of electors will be lost from the register, impacting its integrity.
52. **Government intervention is necessary to address these challenges and to reform and modernise the Northern Ireland canvass** so that it is aligned more closely with the lighter-touch process in GB. Moving to a rolling system of registration will allow for the use of the data available to the Chief Electoral Officer (CEO) to avoid the arbitrary removal of voters that the Electoral Office for Northern Ireland (EONI) is confident are still eligible to be on the register. This is supported by the CEO for Northern Ireland and the EC.

Adding National Insurance numbers to elector records

53. **As the law stands, the CEO does not have powers to add a National Insurance number (NINo) to an elector's record where they have not already included it on their registration form.** In Northern Ireland, a NINo is required to be held on an elector's record, along with date of birth, so that it can be used as a security check when an elector applies for an absent vote, electoral ID card or requests any information about their registration status.
54. **Enabling the CEO to add NINos to an elector's record where it is already known will improve registration by helping ensure electoral records are complete without seeking new or additional information from an applicant.** This will support the implementation of Votes at 16 for 14 and 15 year old attainments,

i.e. those registering in advance of their 16th birthday, who will be unlikely to meet the requirement to provide a NINo as part of their application.

Late registration provisions

55. **The current late-registration requirements in Northern Ireland are an outdated and unnecessary barrier to registration.** They require that additional documentary evidence to support an application must always be provided by anyone trying to register just before an election, even if the data match is clear.
56. **Unless the provisions are repealed they are likely to be a particular barrier to younger electors who have fewer forms of documentary evidence than those over 18.** To remedy this, the Government intends to amend these requirements so that the CEO will only ask for additional supporting documentation if the routine data checks do not provide a clear address and identity match.

'Calling Out' in polling Stations

57. **The current 'calling out' law in Northern Ireland is outdated, unnecessary and can be unwelcome and intimidatory for electors.** The law requires poll clerks to shout out the name and electoral number of everyone to whom they deliver a ballot paper, so that anyone seeking to commit personation may be caught out by anyone present and also facilitated political party representatives sitting within the polling station (polling agents) to write down who has voted.
58. **This provision was originally UK wide, but was removed for GB in the Elections Act 2022 when voter ID was introduced.** The majority of the Northern Ireland political parties, the CEO and the EC have all asked that NI move into line with GB and repeal these provisions.

Amending electoral ID cards

59. **There is a concern that the Electoral Office for Northern Ireland is, from limited budgets designed for electoral delivery, supporting a *de facto* national ID card system and issuing cards to some people who never intend to use them to vote.** Third party organisations are using the card as a primary piece of documentary evidence to support identity for people applying for goods and services, which is not the primary purpose of this document.
60. **Enabling EONI to produce a card that is sufficient to meet a narrow electoral requirement will prevent misuse.** This could be achieved by including on new cards the month and year of birth only, not the day. This would still be a sufficient check for electoral purposes i.e. the intended purpose of the electoral ID card, but would be likely to make it less accepted as primary ID elsewhere.

B. Policy objective

61. **The Government has been clear on its aims to strengthen democracy and reinforce the resilience of our electoral system.** Broadening and deepening engagement in the democratic process is seen a critical part of restoring trust in politics which has fallen in recent years.
62. The Government's manifesto²⁵ set out commitments to:
- **"...improve voter registration and address the inconsistencies in voter ID rules** that prevent legitimate voters from voting..."
 - **"... increase the engagement** of young people in our democracy, by **giving 16- and 17-year-olds the right to vote** in all elections..."
 - **"...protect democracy** by strengthening the rules around donations to political parties..."
63. These commitments underpin three overarching policy objectives aimed at strengthening democratic participation and safeguarding electoral integrity:
- **Broaden democratic engagement**
 - **Reduce the major risks in election delivery, electoral registration, electoral campaigning and political finance**
 - **Remove barriers to participation in democracy.**

B.1 Votes at 16

64. The votes at 16 policy has two main objectives:
- **To build long lasting engagement with our democracy.** By engaging people eligible to voter early, when they are young, the intention is to build the foundations for their participation in our electoral processes. In doing so, the policy aims to close the participation gap with younger voters and build lifelong voting habits.
 - **To enfranchise a younger cohort of electors and ensure consistency for which elections 16- and 17-year-olds can vote in regardless of where in the UK they live.** The current system is not consistent. In Scotland and Wales,

²⁵ [Change - Labour Party, 2024](#)

16- and 17-year-olds can already vote in local council elections and in elections to the Scottish Parliament and Senedd Cymru.

B.2 Improving Registration

65. The improving registration policy has five main objectives:

- **To improve the completeness and accuracy of the electoral registers.** This will result in more people being correctly registered at their current address and a higher percentage of eligible people being registered overall, ensuring a greater proportion of the population has the opportunity to exercise their democratic right to vote.
- **To improve registration rates among groups which are currently under-registered.** Disproportionately affected groups include young people, private renters, some socio-economic groups, some minority ethnic groups and those who have moved address recently²⁶.
- **To make it easier to register to vote, while ensuring that any new and enhanced approaches remain as accessible as possible.** A shift towards more automated processes should enable more effective use of data across the Government estate and support individuals to quickly and easily register and keep their details up to date, in the way that suits them best.
- **To modernise the process for citizens to be added to the open electoral register.** We will move from the existing opt-out process to require citizens to opt-in to appear on the open register. This is a truer form of consent and ensures that citizens can make informed choices about their data. Moreover, this shift will facilitate the gradual introduction of direct registration by strengthening safeguards against individuals appearing on a publicly available version of the register without their explicit consent.
- **To improve provisions for anonymous electors (AEs).** A new arrangement extending the period of time that AE status remains valid would relieve AEs from the disproportionate burden of having to re-register to vote every year.

B.3 Voter ID

66. The voter ID policy has one main objective:

- **To minimise the possibility that legitimate electors are prevented or discouraged from voting by the voter ID requirements, whilst also ensuring the security of our electoral system.** Amending the list of accepted documents, should address concerns that current voter ID

²⁶ [Electoral registers in the UK - Electoral Commission, 2023](#)

requirements may pose too great a barrier for some electors and make it easier for eligible electors to meet the requirements when voting in polling stations.

B.4 Candidate ID and Nominations Changes

67. The candidate ID and nominations changes have one main policy objective per sub-policy, outlined below:

Candidate ID and declaration

- **The policy objective is to strengthen the integrity and transparency of the candidate nominations process by introducing clearer legal accountability and proportionate identity safeguards.** It will do so by requiring candidates to sign a statutory declaration confirming the truthfulness of their nomination information, and by mandating the submission of a scanned form of ID to be held securely by the Returning Officer for use only in the event of a formal challenge.

Withdrawal of political party support for nominations

- **This policy objective is to strengthen public trust in the electoral process by enabling political parties to formally withdraw support for a candidate where serious concerns arise during the nomination period.** By introducing a statutory mechanism for revocation, up to 48 hours before the close of nominations, the policy ensures voters are not misled about party endorsement, allows parties to uphold standards, and provides a clear legal route for disassociation without compromising the integrity or operational feasibility of the election.

B.5 Outcomes of the Elections Review

68. The outcomes of the elections review policy areas have one main objective:

- **To strengthen the resilience and efficiency of electoral administration in the UK.** It aims to reduce operational risks, streamline key processes, such as registration and postal voting, and improve the experience for voters and administrators.

69. Together, the reforms offer a practical, proportionate package that works within the existing legal framework while addressing the most pressing challenges in electoral delivery. An objective is set out for each sub-policy below.

Electoral timetable

- **The policy objective is to reform the electoral timetable to better reflect operational realities.** The current schedule compresses critical tasks like nominations and postal vote production, increasing the risk of delays.

Proposed changes, such as moving the postal vote application deadline and aligning registration cut-offs, would ease pressure and facilitate more contingency.

Election resourcing

- **The policy objective is to ensure that appointments are made at a level where LA officials will have the ability to command use of the resources of a LA if and when needed.** These steps recognise elections as critical public functions requiring strong leadership and support.

Election information power

- **The policy objective is to provide electors with clear, factual and accessible information about how to take part in elections.** The policy will deliver this by taking powers in primary legislation to require ROs and EROs to provide relevant data to the EC or the Government. By standardising and centralising this information, the policy aims to improve education of electors and reduce administrative burden arising from subsequent confusion.

Election forms consolidation measures

- **The policy objective is to simplify the complex process for updating various forms set out in legislation** (e.g. poll cards, ballot papers and polling station voting instructions) by taking powers in primary legislation. This will be achieved by enabling the creation of a single statutory instrument which will reduce complexity, reduce the unnecessary burden on parliamentary time and increase efficiency.

B.6 Absent Voting

70. The absent voting policy package has two main objectives:

- **To increase the resilience and responsiveness of the absent voting system.** This package of measures aims to respond to the increasing demand for absent voting, particularly postal voting, to better meet elector expectations and reduce pressure on supply chains. With demand rising, reforms will allow earlier printing, dispatch and return of postal voting packs, allow earlier reissue of lost postal votes, clarify determination deadlines, and offer flexibility for postal voters to change their voting method close to polling day where they are at risk of losing their vote through circumstance beyond their control.
- **To reduce barriers for electors and administrative burden for electoral administrators in securing maximum-term postal and proxy postal voting arrangements.** Reforms will reduce the regularity with which

applications for maximum-term postal voting arrangements need to be made, while maintaining the security and integrity of the system through regular and proportionate ID checks.

B.7 Harassment and Intimidation

71. The harassment and intimidation policy has one main objective:

- **To minimise the risk that any individual is discouraged from participating in democracy due to harassment or intimidation.** Strengthening protections for those involved in public life and in the administration and delivery of elections, combined with appropriate sanctions for those who seek to damage democratic processes should contribute to this objective.

B.8 Political Finance

72. The political finance policies have one main objective:

- **To reduce the risk of foreign interference and underhand practice in our democratic processes by making it harder for malign actors to subvert the rules around donations to political parties.** These reforms will make it easier to detect and manage the risks of foreign interference, strengthen the rules and close loopholes to protect against foreign interference.

B.9 The Electoral Commission and Enforcement

73. The EC and enforcement policy has one main objective:

- **To strengthen the role and powers of the EC in regulating political finance, address historical enforcement gaps, and improve operational effectiveness.** These changes will ensure that enforcement provides a clear deterrent against breaches of the political finance framework whilst remaining proportionate.

B.10 Imprints

74. The imprints policy has one main objective:

- **To address transparency gaps in the digital imprint rules, place enforcement on a clearer and more proportionate footing, and enable the EC to make minor corrective changes to digital imprint guidance more responsively.** These changes will help facilitate appropriate scrutiny of political messaging and ensure voters can continued to make informed decisions in relation to political campaigning material.

B.11 Northern Ireland Measures

75. The Northern Ireland measures have one main policy objective per sub-policy, outlined below:

The Northern Ireland canvass

- **The policy objective is to modernise and reform the canvass system in Northern Ireland**, allowing for the CEO to retain those electors that they are satisfied are still resident where registered, avoiding the arbitrary removal of large numbers of voters and protecting the integrity of the register. This will bring Northern Ireland into closer alignment with GB.

Adding National Insurance numbers to elector records

- **The policy objective is to improve registration by helping ensure electoral records are complete without seeking new or additional information from an applicant.** This policy should allow the CEO to add NINo to an elector's record where they have not already included it on their registration form.

Late registration provisions

- **The policy objective is to remove an unnecessary barrier to registration in Northern Ireland, particularly for younger electors**, by repealing unique requirements that additional documentary evidence to support an application must always be provided by anyone trying to register just before an election, even if the data match is clear. This policy intends to amend these requirements so that the CEO will only ask for additional supporting documentation if the routine data checks do not provide a clear address and identity match.

'Calling Out' in polling stations

- **The policy objective is to remove the outdated, unnecessary practice of 'calling out' in polling stations which can be unwelcome and intimidatory for electors.** This also brings Northern Ireland into line with GB, where the practice of 'calling out' was removed in 2022.

Amending electoral ID cards

- **The policy objective is to ensure that electoral ID cards are used primarily for electoral purposes** rather than be commonly used as a form of ID to support identity checks for non-electoral purposes such as people applying for goods or services. This will also alleviate some resource pressure on the Electoral Office for Northern Ireland who are responsible for producing the cards.

C. Rationale and evidence to justify the level of analysis used in the IA

76. **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.
77. **Where evidence is not readily available, qualitative analysis has been produced to better understand the potential impacts of the Bill.** Some areas of the analysis, such as the percentage of the 16- and 17- year-old franchise that choose to register, are subject to uncertainty. Therefore, sensitivity analysis has been conducted in Section H to test these assumptions.
78. **Alongside the IA, literature reviews have been carried out to gather further evidence to assess the Bill's wider impacts.** These reviews have informed our analysis and policy development, particularly in relation to improving registration, democratic engagement, and examining the economic benefits associated with democracy.

D. Description of options considered

79. **A range of options have been considered to achieve the overall policy objectives** of strengthening democracy and reinforcing the resilience of our electoral system. This includes a doing nothing approach; a non-legislative approach centred around driving democratic engagement through effective communications, enhanced guidance and increased funding; and a legislative approach aimed at tackling systemic issues facing the electoral system through a range of mechanisms requiring legislation.
80. A summary of the extent to which these options would deliver the policy objectives is found in table 1 below.

Do nothing

81. **Without intervention of any kind, the current arrangements for the electoral process will continue.** This option assumes that none of the Government proposals are implemented, which risks weakening trust in the democratic process, reducing participation and representation, and leaves the electoral system exposed to evolving risks. In particular:
- **The voting age would remain at 18 with 16- and 17-year-olds only able to participate in devolved and local elections in Scotland and Wales.** This

discrepancy creates a poor experience for young people in Scotland and Wales, making it difficult to articulate and understand their rights. It also leaves their peers in England unable to have the same level of engagement, leaving them without the opportunity to participate.

- **Missed opportunities to promote engagement and participation** through civic opportunities and encouraging participation at a younger age.
- **An estimated 7-8 million eligible people would continue to be unregistered or registered incorrectly.** The Government would miss the opportunity to address the registration gap and improve the completeness and accuracy of the register, as well as not supporting certain groups that are disproportionately affected by barriers to registration.
- **An opportunity to improve the registration system and better serve end users would be missed,** as the potential benefits of utilising improved technology, streamlining and joining up services and supporting enhanced data sharing would be left unrealised.
- **Voter ID requirements would continue to pose a barrier to voting** for a small proportion of voters who may find themselves unable to vote or dissuaded from doing so.
- **The nominations process would continue without any additional deterrents against false or misleading candidate declarations.** This would limit the ability to challenge suspicious nominations and may fail to discourage individuals from providing inaccurate or deceptive information.
- **Political parties would remain unable to formally withdraw support for a candidate once nominated, even where serious concerns arise.** This would prevent parties from upholding standards and risk misleading voters about the level of party endorsement on the ballot paper.
- **The system would be at risk of worsening delays in postal vote delivery and subsequent return leading to votes not being counted, increasing administrative burdens, and poor access to resources for ROs.** These issues, if left unaddressed, could undermine voter confidence and the resilience of the system.
- **The longstanding, systemic issue of harassment and intimidation towards candidates, campaigners and electoral staff would continue to worsen** as it has done in recent years.

- **The electoral donation system would remain at risk of foreign interference**, with weak existing controls on donors and recipients leading to vulnerabilities in the system.
- **Existing transparency gaps for digital imprint rules, and fragmentation of enforcement would remain.**
- **Electors would continue to be required to reapply for postal voting arrangements more frequently than necessary**, continuing to put pressure on electoral administrator capacity and presenting an unnecessary barrier for electors.

82. **This option will not meet the policy objective, nor would it deliver the government's manifesto commitments.** This option is used as the counterfactual throughout this IA. To provide a counterfactual, this option assumes no other changes to the electoral system over the 10 year appraisal period. Therefore, there are no additional costs and benefits to the baseline associated with this option.

Non-legislative approach

83. If implemented, a range of **non-legislative interventions could contribute to addressing the issues faced by the electoral sector**. This option assumes none of the legislative interventions are implemented. However, without such legislative change, these measures can only go so far in delivering the policy objectives.

84. Non-legislative interventions considered include:

- **A dedicated democratic engagement programme including civic and political education** to close the participation gap.
- **Increased communications to promote awareness and use of the VAC**, in particular for those groups who may be less likely to hold ID or less likely to be aware of the need to show ID when voting in person.
- **Strengthened guidance for prospective candidates** to make them better aware of the rules for standing for election.
- **Improved guidance, sector-led initiatives, and voluntary adoption of best practice** are examples of non-regulatory interventions considered in the elections review.
- **Providing guidance to LAs to make clear the current expectations and legal powers around data sharing**, in advance of new legislation which will further clarify the position around data sharing.

- **Signposting the registration to vote service to users as part of other government service journeys**, to encourage more people to register.
- **Working with universities, the Further Education sector and other settings**, where high numbers of people could be engaged in the democratic process, through innovative approaches and sharing of best practice.
- **A new code of conduct for candidates and campaigners**, and new guidance for police on how to use existing law in an electoral context to help tackle harassment and intimidation issues.

85. **Non-legislative interventions alone would not be sufficient to address the underlying challenges facing the electoral system.** Consequently, the overarching policy objectives would remain unmet, and key government manifesto commitments undelivered. As such, a purely non-legislative approach falls outside the analytical scope of this IA.

Legislative approach (preferred)

86. **The preferred option is to augment the non-legislative interventions discussed above by implementing a complementary suite of legislative interventions**, including:

- **Lowering the voting age to 16**, engaging voters early, to build the foundations for their participation in our electoral processes and to help close the participation gap.
- **Transforming registration practices**, to simplify the registration process by facilitating a move towards a system of more automated voter registration.
- **Introducing an opt-in system for the open register**, replacing the status quo with a new default where individuals will only be included if they actively choose to opt in.
- **Extending the duration of an AE entry from one year to five years**, helping alleviate the disproportionate administrative burden currently placed on AEs and promote more inclusive democratic participation.
- **Allowing the use of in-date UK-authorised bank cards as an accepted form of ID for voting.**
- **Introducing an ID requirement for candidates** along with a statutory declaration and allowing political parties to withdraw their support for nominated candidates before the deadline.

- **Adjusting key electoral deadlines**, including moving the deadline for the submission of nominations papers, the registration deadline and postal vote application deadline
- **Improving the rules around postal and proxy voting** to make sure electors have alternative options where their postal vote does not arrive in time to be returned before close of poll.
- **Centralising and standardising the collection and publishing of election data** by Introducing for a duty on ROs and EROs to provide standardised election data to the EC or the Government.
- **Strengthening and building on existing deterrents against harassment and intimidation** to ensure that no one is prevented or discouraged from participating in democracy.
- **Strengthening the role and powers of the EC**, to ensure that enforcement provides a clear deterrent against breaches of the political finance framework whilst remaining proportionate.
- **Improving the transparency of digital imprint rules, giving the EC primary responsibility for the enforcement of imprint offences, and enabling the EC to make minor corrective changes to digital imprint guidance more responsively.**
- **Increasing the maximum term of a postal or proxy postal voting arrangement to 5 years**, easing pressure on electoral administrator capacity and reducing administrative burdens for electors.

87. **By integrating legislative measures with non-legislative interventions, this approach offers a comprehensive solution to the challenges confronting the electoral system and is best positioned to realise the policy objectives.** Furthermore, it facilitates the government's delivery of its manifesto commitments.
88. A detailed description of the preferred options for and implementation of each policy can be found in section E.

Table 1: Extent to which options will deliver policy objectives

Extent to which options will deliver policy objectives				
Policy Objective	Do nothing		Non-legislative approach	Legislative approach
Broaden democratic engagement	X	Without any action, the status quo would be maintained, meaning this option would not offer any additional value in achieving the goal of building long lasting engagement with our democracy.	~	Lowering the voting age to 16 can only be achieved through primary legislation. By legislating, the Government intends to ensure that processes are in place to support all young people to participate, including measures to enable those with less conventional routes to registration, such as children looked after by LAs and those who reside overseas due to their parents' being posted abroad.
		There would continue to be inconsistency in which elections 16- and 17-year-olds can vote across the UK.		✓
		An estimated 7-8 million eligible voters would remain incorrectly registered or not registered at all.		
		The Government would risk failing to support underrepresented groups who make up a disproportionate amount of those incorrectly registered or not registered at all.		
		The electoral register in NI would still face the risk that a	There is no non-legislative option to extend voting rights to 16- and 17-year-olds. It is possible that building a long-lasting engagement with our democracy could be partially achieved without extending the franchise, through a dedicated democratic engagement programme. However, there is little evidence to suggest that civic and political education could close the participation gap in isolation meaning any proposals that are not accompanied by legislative change may not be effective. Attempting to drive registration rates through the existing system by focusing on improved democratic engagement is likely to only have limited effect and not necessarily reach those groups who are less likely to be registered. Current legislation hinders the ability of EROs to identify people who are incorrectly registered or not registered at all as it can be misinterpreted and it	Evidence points to the act of participation and voting as the key enabler of increased participation. Hence, extending the parliamentary franchise could result in increased participation. Strengthening the data sharing legislation will allow for the proactive sharing of relevant data by departments and public bodies. This will ensure data sharing can be done in a timely and targeted way that supports EROs identify people who are incorrectly registered or not registered at all.

Extent to which options will deliver policy objectives				
Policy Objective	Do nothing		Non-legislative approach	Legislative approach
		significant number of electors will be lost from the register every 10 years, impacting its integrity and maintaining a situation where eligible voters are incorrectly registered or not registered at all. Inaction in these areas would perpetuate inconsistency between Northern Ireland and the rest of the UK.	does not allow for the proactive sharing of relevant data by departments and public bodies. To ensure that the approach to data sharing can be timely and targeted, legislative changes are necessary. Non-legislative options will not address the cliff edge faced periodically by the requirements of the current system whereby large numbers of electors in Northern Ireland who are entitled to be registered are required to be removed from the register. As with the do nothing option, without legislative change, the current canvass system would continue to pose a risk to the accuracy and integrity of the Northern Ireland register.	Legislative change to data sharing powers and versions of more automated registration could lead to a meaningful improvement in the accuracy and completeness of the registers. The Government is committed to ensuring new approaches to registration are fully tested before implementation, to ensure that any unintended consequences can be resolved. This groundwork should reduce the risk that changes to the electoral system could compromise processes which are integral to the democratic process. Legislative change will enable the Government to modernise and reform the canvass system in Northern Ireland and encourage participation by removing the outdated and unnecessary practice of 'calling out' in polling stations.
Reduce the major risks in election delivery, electoral registration,	X	Maintaining the current system without intervention would risk worsening delays in postal vote delivery and subsequent return - increasing the risk of votes not being counted, increasing	~	The government is committed to taking forward a range of non-legislative measures, such as an updated Code of Conduct for campaigning and improved guidance for police and ROs. While these measures will help improve the general ✓ Changing the maximum term of a postal or proxy postal voting arrangement to 5 years in legislation will address the current barriers to participation and unnecessary administrative burden that the 3 year maximum term presents.

Extent to which options will deliver policy objectives			
Policy Objective	Do nothing	Non-legislative approach	Legislative approach
electoral campaigning and political finance	administrative burdens, and inconsistent access to resources for ROs. These issues, if left unaddressed, could undermine voter confidence and the resilience of the system.	tone of political debate in elections and make the application of existing law more consistent, they do not go far enough to address the scale and systematic nature of the problem.	Introducing the broader package of absent voting measures will increase the resilience and responsiveness of the absent voting system. It does this by creating more space in the electoral timetable for the production, dispatch and return of postal votes; and providing flexibility for administrators to support postal voters where they are at risk of losing their vote due to no fault of their own.
	Electors would continue to be required to reapply for postal voting arrangements more frequently than necessary, continuing to put pressure on electoral administrator capacity and presenting an unnecessary barrier for electors.	Other non-regulatory approaches such as improved guidance, sector-led initiatives, and voluntary adoption of best practice could somewhat reduce risk in election delivery and electoral registration, as well as in the nominations process. However, in practice, these measures would be inconsistently applied and would not resolve systemic issues like the legal constraints on postal vote reissue or the absence of a central registration look-up tool.	Legislative change will allow strengthened controls around company donations, encourage a "Know-Your-Donor" culture, and introduce other measures such as increasing transparency around source of funding of unincorporated associations. These measures will help reinforce electoral legislation against foreign interference, ensuring the policy objective is met to the highest level possible.
	Postal voters would remain unable to change their absent voting arrangements later in the electoral timetable – increasing the risk of losing their vote due to no fault of their own. The nominations process would continue without additional safeguards or deterrents, leaving limited ability	The loopholes that enable foreign interference within our democratic processes would continue to persist. Non-legislative measures such as donors voluntarily disclosing their sources of funding and other details are unlikely to be applied uniformly and would fail to comprehensively address	Adjusting electoral deadlines would strengthen the resilience of electoral administration across the UK.

Extent to which options will deliver policy objectives			
Policy Objective	Do nothing	Non-legislative approach	Legislative approach
	to challenge false or misleading candidate declarations and preventing political parties from formally withdrawing support for candidates once nominated. This would risk undermining public confidence and restrict parties' ability to uphold standards during the nomination period. The electoral donation system would be left at risk of foreign interference. There would continue to be less proportionate and proactive scrutiny of candidate, local third party and recall petition campaigner political finance offences, as they would remain subject only to criminal investigation and prosecution, and administrative offences would for the most part remain criminal offences. The EC would continue to lack a solid legal basis for sharing	transparency issues in political finance. There is no non-legislative option to strengthen the role and powers of the EC or address the existing enforcement gaps. As with the do-nothing option, the enforcement of political finance would remain fragmented and would lack a proportionate and effective deterrent for offences. Improving collaboration on cross-cutting regulatory issues could be improved through non-legislative means. However, any proposals short of providing an explicit statutory gateway to share information are unlikely to provide the solid legal foundation the EC needs to share information dynamically. It is arguable that some campaigners could seek to close these transparency gaps on a voluntary basis but, as with the do-nothing option, without legislative change, there would remain transparency gaps in the digital imprint rules, enforcement would	Delivering a package of targeted legislative changes with operational improvements including clarifying legal responsibilities, enabling better use of technology and facilitating the provision of accessible information about elections to the public should deliver proportionate and practical improvements while minimising disruption. Introducing targeted legislative changes to strengthen candidate declarations and enable party withdrawal of nominations would provide clearer legal accountability, reinforce public confidence, and offer proportionate safeguards against misuse. These changes would deliver practical improvements to the nominations process while maintaining operational stability and minimising disruption. Delivering the proposed package of reforms will improve the transparency of digital imprint rules, and enforcement of all imprint rules, strengthening the integrity and public confidence in

Extent to which options will deliver policy objectives				
Policy Objective		Do nothing	Non-legislative approach	Legislative approach
		information with other regulators and enforcement authorities, undermining effective collaboration on cross-cutting regulatory issues. Transparency gaps would remain in the digital imprint rules, enforcement would remain fragmented, and the EC would be unable to make minor corrections to digital imprint guidance without needing to seek ministerial and parliamentary approval. It would also risk worsening the administrative and resource burden for the CEO in Northern Ireland.	remain fragmented and the EC would continue to be required to seek ministerial and parliamentary approval for minor corrections to digital imprint guidance. Non-legislative interventions would have no impact on mitigating the current challenges to registration in Northern Ireland.	political campaigning. The measures will also enable the EC to make minor corrections to digital imprint guidance without the need to seek ministerial and parliamentary approval. Taken together, the proposed package of legislative reforms to the role and powers of the EC will address concerns about the proportionality of enforcement and current enforcement gaps, provide a greater deterrent for more serious offences, and improve the EC’s operational effectiveness. Legislative change will protect young people’s data in Northern Ireland by removing the legal obligation on the CEO to share details of 16- and 17-year-olds with the court service.
Remove barriers to participation in democracy	X	If no action were taken, the Voter ID requirements would continue to pose a barrier to voting for a small proportion of voters who may find themselves unable to vote or dissuaded from doing so.	~ As with the do nothing option, without legislative change, the Voter ID requirements would continue to pose a barrier to voting for a small proportion of voters.	✓ Legislative change will allow the use of in-date UK-authorised bank cards as an accepted form of ID for voting. Allowing the use of widely held bank cards will help to close the existing gap in ID ownership, ensuring the policy objective is met as fully as possible.

Extent to which options will deliver policy objectives			
Policy Objective	Do nothing	Non-legislative approach	Legislative approach
	The longstanding, systemic issue of harassment and intimidation towards candidates, campaigners and electoral staff would continue to worsen as it has done in recent years. There would continue to be insufficient protections for electoral staff, who are often subject to similar abuse to candidates and campaigners. Candidates acting as their own election agent would continue to have their home address made public in many cases, posing a serious security risk to those candidates and discouraging them from standing for election. AEs would continue to be disproportionately burdened by the requirement to reregister to vote annually.	The VAC already exists to support electors without other accepted forms of ID, but awareness of the VAC is somewhat low. It is possible that a larger communications campaign for voter identification could increase awareness but it seems unlikely that this measure alone will be effective in achieving the policy objective. As with the do nothing option, without legislative change, there would continue to be insufficient protections for electoral staff, no deterrent for those who seek to damage our democracy and have no intention to stand for elective office, and candidates acting as their own election agent would continue to have their home address made public in many cases. As with the do nothing option, AEs would continue to be disproportionately burdened by the requirement to reregister to vote annually.	Removing the requirement for candidates acting as their own election agents to have their home address made public will remove a barrier to such candidates safely standing for election without putting themselves at risk of harassment and intimidation in private home. Legislative measures will strengthen and build on existing deterrents and protections. Extending the disqualification order to cover electoral staff will bring them under the same protect given to candidates, campaigners and elective office holders. Extending the period that an AE entry remains valid from one year to five years can only be made possible through legislative change.

E. Summary and preferred option with description of implementation plan

89. **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.
90. A description of the preferred option and implementation plan for each policy and sub-policy can be found in table 2 below.

Table 2: Summary and preferred option with description of implementation plan

Policy	Sub-policy	Preferred Option	Implementation Plan
Votes at 16		The preferred option is to implement the franchise change through primary and secondary legislation.	This will be accompanied by an implementation plan supported by the government (encompassing the Ministry of Housing, Communities, and Local Government (MHCLG), DfE, and the Department for Digital, Culture, Media, and Sport (DCMS), EROs and the EC, working alongside civil society organisations.
Improving Registration	Direct registration	The preferred option is to introduce a new duty on EROs to register eligible people on the electoral registers for reserved and excepted elections (UKPGEs, all Northern Irish elections and English local elections) without them making an application, following a notification to those people. This will include a power to make regulations on the content of the notification, which will include the reasons	It is expected that the 'direct registration' provisions would not be commenced until aspects of the new provision have been successfully tested or piloted.

Policy	Sub-policy	Preferred Option	Implementation Plan
		why a person might opt-out of being registered in this way (for example, to register manually or register as an AE or service voter) and the time period in which a person has to respond, if they are choosing to opt-out. A similar process is expected to be provided for updating existing entries on a register where a person's name or address (within the same electoral area) has changed.	
	Pilot powers	The preferred option is to introduce a new power through which the Secretary of State for MHCLG can make secondary legislation to run pilots that relate to improving and amending electoral registration matters (including direct registration).	This is intended to be broad enough to test known potential approaches to registration, including aspects of 'direct registration', soon after the Bill but also provide for testing in future years.
	Data sharing powers – direct and assisted registration	The preferred option is to enable government departments and other public bodies across central and local government and the education sector to share data with EROs, for electoral registration purposes. This shared data would then be used to identify and contact unregistered eligible citizens, to assist them to register to vote (assisted registration) with their consent. The data obtained may also be used to register eligible citizens - following a notification - with no need for them to complete an application (direct registration).	Additional secondary legislation setting out the detail of specific data sharing agreements would follow this primary legislation. It is expected that new data flows would be used in parallel with existing registration methods immediately and then gradually be used to support more digitally-enabled approaches.
	Anonymous Electors	The preferred option is to introduce legislation extending the period of time that AE status is valid from one year to five years.	These changes will be implemented through primary legislation, supported by updates to EC guidance. MHCLG will

Policy	Sub-policy	Preferred Option	Implementation Plan
		In addition, a new duty on EROs will be introduced whereby EROs are required to 'check in' with AEs once a year. This 'check in' will involve sending a form of communication containing relevant information such as a reminder of their current AE arrangement, expiry date, voting arrangement, etc. In addition, the current duty of EROs to contact postal voters ahead of their postal vote expiry will be amended. The amendment will require that, in cases where the postal voter is an AE, additional relevant information is provided to them.	work with electoral administrators to ensure operational readiness.
	Future of the Open Register	The preferred option is to move from a presumption that people will be on the open register, unless they actively opt out; to a presumption that they will not be on the open register, unless they actively opt in.	These changes will be implemented through a combination of primary and secondary legislation, supported by updates to EC guidance and changes to EMS systems to accommodate.
Voter ID		The preferred option is to use primary legislation to amend the Representation of the People Act (RPA) 1983 to allow the use of in-date UK-authorized bank cards as ID for voting at polling stations.	These changes will be implemented through a range of primary and secondary legislation, supported by updates to EC guidance. The Department will work with electoral administrators to ensure operational readiness.
Candidate and Nominations Changes	Candidate ID and declaration	The preferred option is to introduce a statutory declaration form and candidates to provide proof of ID as part of the nominations process.	These changes will be implemented through a range of primary and secondary legislation, supported by updates to EC guidance. The Department

Policy	Sub-policy	Preferred Option	Implementation Plan
			will work with electoral administrators to ensure operational readiness.
	Withdrawal of political party support	The preferred option is to introduce a statutory power for parties to revoke nominations up to 48 hours before close.	These changes will be implemented through a range of primary and secondary legislation, supported by updates to EC guidance. The Department will work with electoral administrators to ensure operational readiness.
Outcomes of the Elections Review	Electoral timetable	The preferred option is to adjust key electoral deadlines. This includes moving the deadline for the submission of nominations papers from 4pm to midday on the final day for submitting nominations, moving the registration deadline from midnight to 5pm on the 12th working day before the poll and bringing the postal vote application deadline earlier in time to 5pm on the 14th working day before the poll.	These changes will be implemented through a range of primary and secondary legislation, supported by updates to EC guidance. The Department will work with electoral administrators and suppliers to ensure operational readiness.
	Electoral resourcing	The preferred option is to require the role of ROs to be held by a senior officer and clarify their access to council staff.	Legislative changes will be introduced to define the eligibility criteria for the RO role and to clarify the statutory duty of LAs to provide staff. The Department will work with local government bodies to support implementation and ensure consistency across GB. Guidance will be updated to reflect the new requirements
	Elector information power	The preferred option is to legislate for a duty on ROs and EROs to provide standardised election data to the EC or the Government.	The duty will be introduced through primary legislation, with supporting regulations to define the scope and

Policy	Sub-policy	Preferred Option	Implementation Plan
			format of the data required and specify to whom the data must be provided (the EC or the Government). The EC or the Government will be responsible for collecting and publishing the data and managing the services through which this information is provided to the public.
	Election forms consolidation measures	The preferred option is to legislate to amend the relevant forms powers to enable a consolidation of the forms into regulations.	The consolidation will be implemented through regulations. Policy officials will work closely with the EC and other stakeholders to ensure implementation is properly co-ordinated with the upcoming form changes resulting from the Elections Bill.
Absent Voting		The preferred option is to move the postal vote application deadline three working days earlier in the electoral timetable and extend the maximum term of a postal voting arrangement from 3 to 5 years. These measures will, allow for the earlier reissue of lost or not received postal votes and the cancellation of postal votes and change of voting method in specific circumstances, clarify the deadline for determining postal vote applications and improve wider legislative framework for absent voting.	Amendments will be made to primary and secondary legislation to reflect the new deadlines and discretionary powers. The EC will update its guidance to reflect the changes, and the Department will engage with the sector to ensure they are aware of the changes and in a position to implement them.

Policy	Sub-policy	Preferred Option	Implementation Plan
Harassment and Intimidation	Aggravating factor for intimidatory offences in an electoral context	The preferred option is to create a new statutory aggravating factor in law which applies to intimidatory offences in an electoral context to underline the severity of seeking to damage democratic processes. The aggravating factor will apply to offences listed in Schedule 9 to the Elections Act 2022 motivated by hostility towards candidates, future candidates, campaigners, elected representatives, and electoral staff. This will mirror the existing disqualification order. Courts will be required to take this aggravating factor into account when determining the sentence. This will apply to sentences in England, Wales and Northern Ireland. There is an existing aggravating factor in Scottish Law. The Department will work with the Ministry of Justice (MOJ), the Crown Prosecution Service (CPS) and the Sentencing Council to develop guidance on how the aggravating factor should be applied consistently.	These changes will be implemented through primary legislation. There will be a role for prosecutors to establish the evidential base to prove hostility for both the disqualification order and the aggravating factor and bring these to the court's attention. Ultimately, both the disqualification order and the aggravating factor will be imposed by courts at the point of sentencing. The Department will engage with judicial and prosecutorial bodies to understand whether additional guidance is required to ensure consistent application of these measures.
	Extending the disqualification order to cover electoral staff	The preferred option is to extend the remit of the disqualification order to cover the following electoral staff: - ROs and members of their staff - registration officers and members of their staff - counting officers, including the chief counting officer, a deputy of the chief counting officer, a counting officer, a deputy of the counting officer, a member of the chief counting officer's staff and a member of the counting officer's staff - petition officers and members of their staff	

Policy	Sub-policy	Preferred Option	Implementation Plan
		This will apply to all UK elections apart from Scottish parliamentary and local elections, which are covered by equivalent Scottish law.	
	Removing outstanding requirements for candidates addresses to be published	The preferred option is to amend Section 67(6) of the RPA 1983 to remove the requirement for publishing the home addresses of candidates acting as their own election agents in the notice of election agents. We will also add that all election agents may use a correspondence address. This is for all UK parliamentary elections, and local elections in England.	This change will be implemented through primary legislation. The Department will work with the EC to ensure that guidance for candidates regarding the nominations process clearly sets out how they can choose not to have their home address made public.
Political Finance	Unincorporated Associations	The preferred option is to significantly lower the transparency thresholds so that UAs will need to register with the EC if they make donations over £11,180, and report all gifts over £2,230. Also to extend these disclosure requirements to cover unincorporated associations that contribute directly to candidates. Additionally, mandate that each unincorporated association nominates a responsible individual to be publicly listed on the register, ensuring greater accountability. Also requiring UAs which wish to make political contributions above the £11,180 threshold to conduct permissibility checks on gifts they receive for the purpose of making political contributions. UAs would not be able to make donations to other UAs.	All political finance measures will require primary legislation, with the exception of provisions on connected sources of funding under section 54A. The EC is expected to issue both statutory and non-statutory guidance in line with its regulatory responsibilities. To promote coherence and consistency in electoral regulation across the UK, and subject to devolution analysis and the outcome of legislative consent motions, these measures are intended to apply to reserved, excepted, and devolved elections, pending ongoing engagement

Policy	Sub-policy	Preferred Option	Implementation Plan
	Company donation rules	The preferred option is that companies and limited liability partnerships will only be permitted to make a political donation if they have made sufficient profit (demonstrated over a 5 year period) to cover the donation, and they meet eligibility criteria on UK headquarters and on ownership to ensure they have a genuine connection to the UK.	with the Scottish and Welsh Governments. The measures are not intended to have retrospective effect and are expected to come into force following Royal Assent. Certain provisions, such as the new UAs threshold, will be commenced by regulation on a specified date after Royal Assent, applying only to regulated periods beginning thereafter.
	Forfeiture of donations	The preferred option is to ensure that when illicit funds do enter the system via impermissible donors (e.g. individuals not on the electoral register), they will be subject to full forfeiture, and no exception can be made to allow for partial forfeiture where donors are eligible to vote, but not registered in a UK electoral register at the time of donation.	
	Know Your Donor guidance	The preferred option is that recipients of donations will be required to consider the risk of those donations being illegitimate, such as considering sources of funding where the risk of foreign interference may be higher. The EC will also provide guidance on conducting risk assessments around accepting donations	
	Cryptoassets moratorium	The preferred option is to prohibit political donations in the form of cryptoassets of any value.	
	Overseas electors donation cap	The preferred option is to cap the total political donations an overseas elector can make in a year to £100k. The cap will continue to apply to those overseas electors who return to the UK for at least one full calendar year.	
The Electoral Commission and	Closing the enforcement gap	The preferred option is to extend the EC's Remit and Civil Sanctioning Powers to RPA and Recall of MPs Act (RoMPA) Election Finance Offences by extending the EC's civil sanctioning and investigatory powers to these	All enforcement measures will require primary legislation. Secondary legislation will be required to amend the list of prescribed offences and prescribed

Policy	Sub-policy	Preferred Option	Implementation Plan
Enforcement		offences. Candidates, local third parties and recall petition campaigners will also now send returns directly to the EC rather than ROs.	restrictions and requirements subject to civil sanctions and the level of the EC's maximum fine. It is intended that reforms to apply UK-wide at all elections, including national elections and local government elections. To ensure coherence and consistency across electoral regulation in the UK, our intention is for this to include reserved, excepted and devolved elections (pending ongoing discussions with the Scottish and Welsh Governments). It is the expectation that that all regulations will come into force after Royal Assent. The extension of EC remit and powers to RPA and RoMPA election finance offences may need savings provisions to allow the EC to build up its resources and capacity and amend its guidance.
	Reclassifying administrative offences	The preferred option is to reclassify an extensive range of administrative offences across PPERA, the RPA, and RoMPA so that they are for the most part punishable through civil sanctions.	
	Increase the EC's maximum fine	The preferred option is to increase the EC's maximum fine to an amount of up to £500,000 with safeguards in place to ensure fines are proportionate for political parties which are less well resourced.	
	Enhancing EC's information sharing powers	The preferred option is to give the EC a broad reciprocal statutory gateway to lawfully disclose to, and receive information from, other regulators, enforcement agencies and relevant public authorities for the purpose of assisting the receiving body in carrying out its functions.	
	Extending the EC's Supervisory and Investigatory Powers	The preferred option is to extend the EC's powers to require the disclosure of relevant material outside of an investigation under Schedule 19B to any person or organisation who may hold such material. Relevant material is documents or information/explanation which (i) relates to the income and expenditure of a regulated entity and (ii) the EC reasonably requires for carrying out its functions.	
	Leave to pay	The preferred option is to transfer responsibility for granting leave to pay claims from the courts to the EC.	

Policy	Sub-policy	Preferred Option	Implementation Plan
	Standardised Reporting	The preferred option is to provide the Electoral Commission with powers to prescribe the form and contents of campaign spending returns for registered political parties, recognised third parties and permitted participants.	Implementation through primary legislation with supporting guidance from the EC to set out prescribed forms and content requirements. Secondary legislation will be required to amend the 2010 Civil Sanctions Order, so that compliance with the form and contents of returns that must be used is a prescribed restriction and requirement subject to EC enforcement and civil sanctioning powers.
	Strategy and Policy Statement Repeal	The preferred option is to repeal the power for the Secretary of State to designate a Strategy and Policy Statement, and remove all associated duties on the EC, as well as the power for the Speaker's Committee to examine the EC's performance in relation to the Statement.	Delivery of the repeal will be in primary legislation. The repeal will clarify that the Secretary of State may not designate a Statement, the Electoral Commission has no duty to have regard to a Statement, and the Electoral Commission is not required to publish a report on what it has done in consequence of any Statement which was designated during any 12-month period ending on or after the day on which the repeal comes into force.

Policy	Sub-policy	Preferred Option	Implementation Plan
			The Speaker's Committee will also no longer have the power to examine the Commission's performance of its duties in relation to a Statement.
Imprints	Extending the digital imprint rules to 'organic material' promoted by third party campaigners who are not recognised	The preferred option is to extend the UK-wide digital imprint rules to require 'organic material' (i.e. digital material which has not been paid to be advertised) and which is promoted by or on behalf of third party campaigners that are not recognised, to include an imprint, with the exception of individuals. This will ensure that the rules promote transparency around organic digital campaigning material promoted by third-party campaigning organisations who are not registered with the Electoral Commission, while protecting freedom of expression and avoiding undue burdens on individuals simply expressing their political opinions online.	Delivery of the preferred changes to imprints measures will require a mixture of primary and secondary legislation. The expectation is that the EC would update its guidance to support campaigners and enforcement authorities in understanding how the rules will be enforced across the imprints measures.
	Streamlining the enforcement of the digital and print imprint regimes	The preferred option is to streamline the enforcement of the imprint rules, so that the EC take responsibility for enforcing all imprint offences in the first instance. This will bring greater clarity, consistency and proportionality to the enforcement of the imprint rules.	
	Amending the procedure in relation to the EC's guidance on digital imprints	The preferred option is to remove both the requirement for Secretary of State approval and the 40-day parliamentary process for implementing minor corrective updates to the digital imprint guidance. By removing these procedural requirements for minor corrective changes, the EC will be	

Policy	Sub-policy	Preferred Option	Implementation Plan
		able to update its guidance more responsively, where for example, changes in platform names arise.	
Northern Ireland Measures	The Northern Ireland canvass	The preferred option is to amend primary legislation to give the Secretary of State powers to reform and modernise the NI canvass. This option should also allow for any future reform of the system which may be required to be made without the need for primary legislation which has been a significant barrier to reform of the current outdated system	Secondary legislation setting the detail of how the reformed NI canvass will operate would follow this primary legislation. We will be able to set out the direction of the reform and its intent at introduction to facilitate passage of the Bill.
	Adding National Insurance numbers to elector records	The preferred option is to amend primary legislation to facilitate giving the CEO for NI the powers to add a NINo to an electors record without them providing the information.	This change will be implemented through amendments to primary legislation facilitating a new power for the CEO. The details of this power will be set out in additional secondary legislation. The Northern Ireland Office will work with the CEO for Northern Ireland to ensure operational readiness following RA/commencement.
	'Calling Out' in polling stations	The preferred option is to amend legislation removing the requirement for 'calling out' of an elector's name and number at a polling station.	This change will be implemented through primary legislation, supported by updates to the Electoral Office for Northern Ireland guidance. The Northern Ireland Office will work with the CEO for Northern Ireland and EC to ensure operational readiness.
	Amending electoral ID cards	The preferred option is to amend primary legislation removing the requirement for the day of birth to appear on a NI electoral ID card.	This change will be implemented through primary legislation, supported by updates to the Electoral Office for Northern Ireland guidance. The Northern Ireland Office will work with the CEO for Northern Ireland and EC to ensure operational readiness.

F. Appraisal

91. **The analysis focuses on the impacts of primary legislation.** Some measures in the Bill will require supporting secondary legislation to set out more fully how they will operate. This secondary legislation will be subject to its own consultation, scrutiny, and assessment. As a result, there are limits to how fully the potential impacts can be assessed at this stage.
92. **Each policy is assessed against a ‘Do Nothing’ counterfactual scenario,** where the government takes no legislative or non-legislative action to address issues in the electoral system. A new burdens assessment will also be undertaken for these policies.
93. **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** (this will be done at secondary legislation stage). Some of the cost components have yet to be quantified, such as digital costs, and others are based on current best assumptions, such as the estimated uptake of each policy. To account for this variability around cost estimates, 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 the IA.
94. **An appraisal period of 10 years is used as per standard practice for IAs, from 2025²⁷.** This is the earliest point from which reforms could have taken effect when the appraisal period was determined. Implementation timings will be dependent on the timing of Royal Assent, secondary legislation. Costs are presented in 2025/26 prices²⁸. Figures are rounded to the nearest £0.1 million and totals may not sum exactly due to this rounding.
95. **The EC has assessed the impact of the proposed bill measures on the Commission and estimated the resource required by the Commission to support implementation of bill measures.** The costs associated with a given measure are presented alongside the other costs estimated for that measure. The Electoral Commission has indicated that the implementation of the Bill will require additional staffing beyond that associated with the new enforcement powers, for example its engagement and public awareness work to support Votes at 16 and the new regulatory functions not covered as part of the enforcement powers. However, other than those associated with the enforcement measures, wider staffing costs have been excluded from this Impact Assessment. This reflects the fact that the Commission will take on new and expanded responsibilities as a direct result of the

²⁸ Prices are shown in 2025/26 to provide consistency and comparability with the costs presented in previous iterations of this Impact Assessment.

proposed reforms around enforcement measures. The staffing costs included here are therefore a direct impact of the policy itself, rather than being associated with transitional or implementation support as in the other policy areas. This approach is consistent with the treatment of MHCLG departmental staffing costs stemming from other policy measures included within this Impact Assessment.

96. **The impacts of the policies in this Bill on the costs of conducting Police and Crime Commissioner (PCC) elections have been included in this appraisal.** Although the government has announced its intention to abolish PCCs (and their elections as a result), this change will be implemented through separate future legislation. Consequently, the appraisal reflects the current statutory position, under which PCC elections will continue unless and until future legislative change dictates otherwise.

Option 1 – Legislative Approach

F.1 Votes at 16

F.1.1 Methodology

97. **This analysis begins by estimating the eligible population.** To do this, first the number of eligible 14- to 17-year-olds is estimated using population data^{29,30}. This figure is then multiplied by eligibility factors to give the eligible population for different types of election, as not all 16- and 17-year-olds will meet the criteria to vote. To vote in UKPGEs you must be a UK or Irish citizen, or a qualifying Commonwealth citizen living in the UK³¹. To vote in local and PCC elections in England you must meet the criteria to vote in UKPGEs or be a qualifying EU citizen living in the UK.
98. **The eligibility factors are assumed to be 96.9% for UKPGEs and 99.6% for local and PCC elections,** based on the proportion of the 18- to 25-year-olds who report being eligible to vote in each respective election based on waves 29 and 30 of the British Election Study Internet Panel^{32,33}.
99. The eligible population is then adjusted by population forecasts^{34,35,36,37} to estimate how the franchise changes over the 10-year appraisal period. **The relevant cost**

²⁹ [Estimates of the population for the UK, England, Wales, Scotland, and Northern Ireland - Office for National Statistics, 2025](#)

³⁰ [Constituency data: Population, by age - Barton, 2025](#)

³¹ [Who can vote in UK elections - Electoral Commission, 2025](#)

³² [British Election Study Internet Panel waves 29 – British Election Study, 2024](#)

³³ [British Election Study Internet Panel waves 30 – British Election Study, 2025](#)

³⁴ [Subnational population projections for England - Office for National Statistics, 2020](#)

³⁵ [National population projections: 2021-based - Stats Wales, 2024](#)

³⁶ [Projected Population of Scotland: 2020-based - National Records of Scotland, 2023](#)

³⁷ [Population Projections for Northern Ireland: 2022-based - Northern Ireland Statistics and Research Agency, 2025](#)

components are then applied to these forecasts to estimate the total impact.

The cost components are as follows:

- Registration costs
- Canvass costs
- Conduct costs
- Communications costs

100. **The overseas elector franchise of 16- and 17-year-olds is forecast separately.** This is based on internal MHCLG modelling used for the Elections Act 2022 Overseas Electors IA³⁸. It is assumed that 14.2% of overseas electors will be added to the electoral register in years with a UKPGE and 3.3% in years where there is not.
101. **It is assumed that 88.9% of the eligible population will be added to the electoral register.** This is higher than the current completeness of the register for comparable age groups (60% of 18- to 19-year-olds are correctly registered as of 2022³⁹). The assumption is aligned with the assumed level of register completeness at the end of the appraisal period, used in the Improving Registration policy model.
102. **Table 3 below shows the estimated size of the franchise for 16- and 17-year-olds and the number added to the electoral register per year in the appraisal period.** This covers franchises/electoral registers for both local government elections and UKPGEs. The figure for the number of UKPGE electors also includes overseas electors. It should be noted that 16- and 17-year-olds in Scotland and Wales who can already vote in certain elections are included in these figures.

³⁸ The Representation of the People Act – Extension of franchise to British citizens overseas – MHCLG, 2023

³⁹ Electoral registers in the UK - Electoral Commission, 2023

Table 3: Summary of estimated franchise and registered 16- and 17-year-olds (millions, 2027/28 - 2034/35)

Year	Estimated Franchise			Estimated Registered Electors	
	Domestic		Overseas Electors		
	Local Government Elections	UKPGE	UKPGE	Local Government Elections	UKPGE
2027/28	1.7m	1.7m	>0.1m	1.5m	1.5m
2028/29	1.7m	1.7m	>0.1m	1.5m	1.5m
2029/30	1.7m	1.7m	>0.1m	1.5m	1.5m
2030/31	1.7m	1.7m	>0.1m	1.5m	1.5m
2031/32	1.7m	1.7m	>0.1m	1.5m	1.5m
2032/33	1.7m	1.7m	>0.1m	1.5m	1.5m
2033/34	1.7m	1.6m	>0.1m	1.5m	1.5m
2034/35	1.6m	1.6m	>0.1m	1.5m	1.4m

103. **The costs of the policy are modelled separately for GB and Northern Ireland.** This is due to differing electoral systems and data availability between the two. Costs for Northern Ireland were estimated with the support of the EONI. The analysis described below refer to costs in GB unless specifically stated to be Northern Ireland.

F.1.2 Monetised impacts

F.1.2.1 Direct costs

Registration costs

104. The costs for registration services are estimated using the number of eligible 14- to 17-year-olds, data on costs collected from LAs, methodologies and assumptions from the Elections Act 2022, and administrative data on applications.

Register to Vote Costs

105. There will be costs for LAs in processing additional applications from 14- to 17-year-olds. Several assumptions are made around demand for this service:
- **Demand in first year eligible to vote** (for 16- and 17-year-olds in 2027/28, and 16-year-olds from 2028/29 onwards) – 94.9% of the eligible population per year, this is based on the proportion of the population assumed to be added to the

register and the average application rejection rate (6.3% of applications, based on data collected from LAs⁴⁰).

- **Demand for other years** (17-year-olds from 2028/29 onwards) - 13.5% of the eligible population per year, this is based on volumes from administrative application data, to reflect the proportion who change their details or newly register each year⁴¹.
- **Demand for attainers** - 24.5% of the eligible population per year, also higher than current rates, this is based on the approximately same level of improvement of register completeness for 16- and 17-year-olds (i.e. increasing the current 60% of 18- to 19-year-olds registered to 92% of the newly enfranchised 16- and 17-year-olds registered). The level of completeness for attainers was 16% in 2022⁴².

106. **The costs are estimated based on data collected from LAs⁴⁰** on the proportion of applications with no issues, minor issues and major issues for paper and online applications, and how much they cost to process each type.

107. Costs are also modelled for sending the decision outcomes for all applications. Key assumptions (based on data collected from LAs⁴⁰ and administrative application data⁴¹) include:

- **Proportion of Register to Vote applications submitted online** – 89.9%
- **Proportion of decision outcomes sent with paper** – 19.4%
- **Cost of sending physical decision outcome** - £1.18
- **Cost of sending digital decision outcome** - £0

108. **These assumptions are then used to calculate the total costs of processing the applications.** The assumptions are combined with the estimate of franchise size, to give the number of applications, and then the number of applications of each type (online, paper, no issues, minor issues, major issues), then finally the total costs⁴³.

109. **Currently the identity check for most register to vote applications is done using the applicant's NINo.** Most 14- and 15-year-olds do not have NINos, meaning different methods will need to be used. It is assumed that the proportion

⁴⁰ MHCLG Survey Data: Survey to Local Authorities and Valuation Joint Boards in March 2025 (185 responses of 360 LAs and VJBs in Great Britain).

⁴¹ Register to Vote Application Administrative Data

⁴² Electoral registers in the UK - Electoral Commission, 2023

⁴³ Since the previous version of this Impact Assessment, the calculation of processing costs has been reviewed and updated, leading to an increase in the estimated Register to Vote processing costs.

of applications with no issues, minor issues and major issues are the same as for applicants with NINOs.

110. **In Scotland and Wales 16- and 17-year-olds can already register to vote.** The expected volumes assumed in this appraisal are greater than the current level of register completeness in both Scotland and Wales meaning that LAs in Scotland and Wales will experience increased costs due to the policy. To account for this, we model that **all the costs associated with electors already on the register are covered using existing funding, while the costs associated with any electors beyond that will be funded by this policy.**
111. **The current register completeness in Scotland and Wales is estimated using the number of 16- and 17-year-olds registered divided by the 16- and 17-year-old population^{44,45}.** The difference between this and the assumed register completeness (88.9%) is divided by the assumed register completeness to give the proportion of the costs that will be covered by new funding for the policy. The costs for Scotland and Wales are multiplied by this figure (0.28 in Scotland, 0.47 in Wales) to give the costs of additional volumes generated by the policy (rather than the total costs of registering 16- and 17-year-olds).

Porting

112. As a transitional measure, LAs in Wales and Scotland will need to port existing eligible electors on their registers for devolved elections on to their registers for UKPGEs and PCC Elections (Wales only). It is assumed that **porting will be a largely automated process and will create no additional burden for these LAs.**

Absent Vote Application Costs

113. Having registered to vote, **it is expected that many 16- and 17-years olds will also apply to vote via post or proxy.** It is assumed that there will be no absent vote applications from attainers (14- and 15-year-olds). Currently in Wales and Scotland you cannot register for devolved administration and council elections using the Online Absent Vote Application (OAVA) service. We expect this to change before the franchise change is introduced and these estimates assume that all electors can apply for absent votes using the online service for all elections in GB.
114. The following assumptions have been made about demand for absent vote applications per year:
- **Postal demand in first year eligible** (for 16- and 17-year-olds in 2027/28 and 16-year-olds from 2028/29 onwards): 31.1% of electorate, based on the proportion of 18- to 34-year-olds reporting being registered for a postal vote

⁴⁴ [Electoral registration in Great Britain in 2023 - Electoral Commission, 2024](#)

⁴⁵ [People registered to vote - National Records of Scotland, 2025](#)

in the public opinion research for the Electoral Integrity Programme evaluation⁴⁶ divided by the rejection rate for postal vote applications for application administrative data⁴⁷.

- **Postal demand in other years (years with UKPGE)** (17-year-olds from 2028/29 onwards): 4.3% of electorate. This is based on volumes from administrative application data⁴⁷.
- **Postal demand in other years (years without UKPGE)** (17-year-olds from 2028/29 onwards): 1.9% of electorate. This is based on volumes from administrative application data⁴⁷.
- **Proxy demand in first year eligible** (for 16- and 17-year-olds in 2027/28 and 16-year-olds from 2028/29 onwards): 6.6% of the electorate, based on the proportion of 18- to 34-year-olds reporting being registered for a proxy vote in the public opinion research for the Electoral Integrity Programme evaluation divided by the rejection rate for postal vote applications for application administrative data⁴⁸.
- **Proxy demand in other years (years with UKPGE)** (17-year-olds from 2028/29 onwards): 0.6% of the electorate, based on volumes from administrative application data⁴⁸.
- **Proxy demand in other years (years without UKPGE)** (17-year-olds from 2028/29 onwards): 0.1% of electorate, based on volumes from administrative application data⁴⁸.

115. **The costs associated with absent vote applications are estimated following the methodology from the Elections Act 2022 OAVA IA⁴⁹**; this methodology has since been updated to include the assumptions above and to reflect the latest administrative data and processing cost information from LAs^{50,51}.
116. **16- and 17-year-olds are already able to apply for absent votes for devolved elections, but volumes are assumed to increase** compared to what they currently are. The same factor is used as for Register to Vote costs to estimate the additional absent vote costs for Welsh and Scottish LAs.

Voter Authority Certificate Costs

117. 16- and 17-year-olds may also choose to apply for a VAC. It is assumed that there will be no VAC applications from attainers (14- and 15-year-olds). These costs are

⁴⁶ [Evaluation of Electoral Integrity Programme: public opinion research wave 3 – MHCLG, 2025](#)

⁴⁷ Postal Vote Application Administrative Data

⁴⁸ Proxy Vote Application Administrative Data

⁴⁹ [The Representation of the People \(Postal and Proxy Voting\) – MHCLG, 2023](#)

⁵⁰ MHCLG Survey Data: Survey to members of the Elections Expert panel in August 2024

⁵¹ Since the last version of this Impact Assessment, the modelling has been updated to reflect the absent voting registration length changes, leading to a reduction in absent voting registration costs.

estimated using the methodology from the Elections Act 2022 Voter ID IA⁵². **There are two costs that are modelled for the VAC service:**

- i. **The cost of processing the application**
- ii. **The cost of printing paper VACs**

118. **It is assumed that 10% of registered 16- and 17-year-olds will apply for a VAC each year.** Based on administrative application data⁵³ it is assumed that 90.8% of VAC applications will lead to a VAC being printed.
119. **Total cost is calculated by multiplying the number of applications and VACs sent to print by the unit costs** (at current prices) for processing applications and printing VACs used in the Elections Act 2022 Voter ID IA.

Overseas elector costs

120. **By extending the franchise, there will also be more overseas electors who are eligible to vote in UKPGEs.** The following assumptions are made about the demand for the Register to Vote service for overseas electors. These are based on modelling used for Elections Act 2022 Overseas Electors IA⁵⁴.
- **Demand in years with a UKPGE:** 15.8% of overseas franchise
 - **Demand in years without a UKPGE:** 3.7% of overseas franchise.
121. **The costs are estimated using the methodology from Elections Act 2022 Overseas Electors IA to model the overseas franchise size of 16- and 17-year-olds.** The unit costs and other assumptions of the methodology have been updated based on administrative application data⁵⁵ and processing cost information from LAs⁵⁶.

Training and Staffing Costs

122. **Extra staff may be needed to deal with the additional demand in some LAs.** The LAs that will need extra staff are predicted using an experimental relationship between the size of electorate and the number of registration staff needed, found in internal MHCLG research. The number of 16- and 17-year-olds expected to be on the register is added to this equation and the LAs that require an additional member of staff are found.

⁵² The Voter Identification Regulations – MHCLG, 2022

⁵³ Voter Authority Certificate Application Administrative Data

⁵⁴ The Representation of the People Act – Extension of franchise to British citizens overseas – MHCLG, 2023

⁵⁵ Overseas Elector Application Administrative Data

⁵⁶ MHCLG Survey Data: Survey to members of the Elections Expert panel in August 2024

123. **The total number of extra staff needed when 16- and 17-year-olds are included in the franchise is then multiplied by wages and the costs of required training (based on data collected from LAs⁵⁷) to find the total cost for each LA.**
124. **Both existing and new registration staff are expected to need training on processing applications from young people.** The total number of staff that require training is found using the relationship described in the above paragraph applied to the expected total electorate aged 16 and over. The training is assumed to last for one day (7 hours), at the standard cost for training delivered by the AEA. This training is expected to only occur in 2027/28.

Northern Ireland: Registration Costs

125. **Registration costs are calculated based on the existing registration costs provided by the EONI multiplied by the expected percentage increase of the franchise.** This is then uplifted by population growth to reflect demographic changes.
126. **These estimates are based on the current level of register completeness in Northern Ireland (83% as of 2022⁵⁸),** which is lower than the assumed completeness rate (88.9%) for 16- and 17-year-olds in GB.
127. **The ambition is for the completeness to match what is assumed for GB.** To account for this, the costs in Northern Ireland are then uplifted by the ratio of these two completeness rates ($88.9\%/83\% = 1.07$).

Northern Ireland: Training and staffing costs

128. Training and staffing costs in Northern Ireland are calculated using the same methodology as described for GB.

Northern Ireland: Systems costs

129. An estimate was provided by EONI on how much it would cost to update their systems to be able to process and store data from/on young people.
130. **In summary, total registration costs are estimated to cost between £11.4 million and £34.2 million, with a central estimate of £22.8 million (2025/26 prices, 10-year PV).**

Canvass costs

131. Canvass costs are estimated using the number of eligible 16- to 17-year-olds and data on costs collected from LAs.

⁵⁷ MHCLG Survey Data: Survey to members of the Elections Expert panel in August 2024

⁵⁸ [Electoral registers in the UK - Electoral Commission, 2023](#)

132. **With the increased franchise size, there will be more people to canvass as part of the annual canvass.** In England 16- and 17-year-olds will now be part of the annual canvass. The two costs are modelled for the annual canvass:
- i. Invitations to Register (ITR)
 - ii. Household Canvassing.
133. **The number of ITRs sent to electors and households canvassed as part of the annual canvass is taken from the EC's annual canvass data from 2020 to 2023⁵⁹.** This is then divided by the current eligible population. This is then multiplied by the expected population of eligible 16- and 17-year-olds to give the additional volumes associated with the policy.
134. **The cost associated with sending ITRs is found by multiplying the above volume, the unit cost of sending paper ITRs and the proportion of ITRs sent via paper** (both collected from LAs⁶⁰). It is assumed that the cost of sending online ITRs is negligible.
135. The cost associated with house canvassing is found by multiplying the above volume with the unit cost of household canvassing. The additional household canvassing costs only apply for the first canvass after the franchise changes comes into effect.

Northern Ireland: Canvass costs

136. **While the canvass system in Northern Ireland is due to change, the specific details will be set out in forthcoming secondary legislation.** The proposed changes are anticipated to be cost neutral. Therefore, for the purposes of this assessment, the cost implications of lowering the voting age on canvass costs in Northern Ireland have been modelled using the existing canvass system, where the canvass is run every 10 years, with it last being run in 2021.
137. **These costs are calculated based on canvass costs from 2021 provided by the EONI, multiplied by the expected percentage increase of the franchise.** This cost is then uplifted by the expected population change between 2021 and 2030, to reflect the number of 16- and 17-year-olds that are expected to be part of canvass.
138. **Canvass costs are estimated to cost between £0.5 million and £1.5 million, with a central estimate of £1.0 million (2025/26 prices, 10-year PV).**

⁵⁹ Electoral registers in the UK - Electoral Commission, 2023

⁶⁰ MHCLG Survey Data: Survey to Local Authorities and Valuation Joint Boards in March 2025 (185 responses of 360 LAs and VJBs in Great Britain).

Conduct costs

UKPGE and PCC conduct costs

139. **With additional electors the costs for running elections will increase.** Costs for UKPGEs and PCC Elections are reimbursed to ROs via the Consolidated Fund. The additional costs associated with extra electors are based on the Maximum Recoverable Amounts (MRAs) from the 2024 UKPGE and 2024 PCC elections^{61,62}.
140. **UKPGEs are assumed to take place in May 2028 and May 2032 on the same day as other May elections.** It is not possible to accurately predict when the next UKPGEs will occur, so this analysis presents a possible scenario. This does not reflect any plans of when future elections will take place.
141. **If the UKPGE were to take place on a day separate from the scheduled May local and PCC elections, then the cost of the policy would rise.**
142. Costs associated with the running of these elections are split into three types. These are costs on a per-electors basis, costs on a per-polling station basis, and costs that are independent of the number of electors or polling stations in a given area.
143. **The costs on a per-electors basis are costs that vary with the number of electors.** These are the costs associated with:
 - i. Poll cards
 - ii. Postal Voting (including training, not including application costs)
 - iii. Overseas Electors (not including application costs)
 - iv. RO Service Fee
 - v. Addressed Candidate Mailing (UKPGE only)
144. For the per-electors costs, **the total costs are divided by the electorate for the 2024 elections to give the cost per elector. These are then multiplied by the expected 16- and 17-year-old electorate** for both 2028 and 2032, to give the costs at these elections for 16- and 17-year-olds.
145. **The costs on a per-polling station basis are costs that vary with the number of electors.** These are the costs associated with:
 - i. Polling stations
 - ii. Poll clerks

⁶¹ The Parliamentary Elections (Returning Officers' Charges) - MHCLG, 2024

⁶² The PCC Elections (Local Returning Officers' and Police Area Returning Officers' Charges) – MHCLG, 2024

146. **The number of poll clerks per polling station is based on EC guidance⁶³** which recommends a maximum of 2,250 electors per polling station. For a polling station with 0 to 1,250 electors, two poll clerks are recommended, and for polling stations with 1,250 to 2,250 electors, three poll clerks are recommended.
147. **For every 2,250 16- to 17-year-old electors, an additional polling station is assigned to the LA/constituency, and for every 1,250 electors on top of that an extra poll clerk is assigned to an existing polling station** (for example, if there are 6,000 16- to 17-year-old electors in an LA, it will be allocated two additional polling stations and one additional poll clerk at an existing polling station).
148. **Polling station and poll clerk costs are estimated by multiplying the extra demand by unit cost.** To estimate additional polling station costs, the 2024 cost per polling station is multiplied by the number of additional polling stations needed. The extra poll clerk costs are estimated as the number of extra poll clerks needed multiplied by the poll clerk day wage.
149. **Costs that are independent of electors or polling stations are assumed to not change with the expansion of the franchise.** These costs are:
- i. Costs associated with the count.
 - ii. Unaddressed candidate mailing (UKPGE only) – as the number of households will not change.
150. **When elections in a given area are run on the same day, some costs can be combined across elections.** In this case, the costs concerned are those associated with polling stations, as the same polling stations and polling station staff will be used for all elections. These costs are split equally between all the different polls in the given area.

Local and Devolved Election Conduct Costs

151. **Costs for local (all GB) and devolved (Wales and Scotland only) elections, which are not reimbursed from the consolidated fund, are also expected to increase due to the policy, due to a larger franchise in England, and increased registration rates in Scotland and Wales.** Since less granular data is available for these elections, a different approach is used.
152. **The costs for these elections are estimated using data on the cost per elector per election collected from LAs⁶⁴.** A different unit cost is used depending on the number of concurrent elections taking place, as some costs can be shared between

⁶³ Guidance for (Acting) Returning Officers administering a UK Parliamentary election in Great Britain - Electoral Commission, 2024

⁶⁴ MHCLG Survey Data: Survey to Local Authorities and Valuation Joint Boards in March 2025 (185 responses of 360 LAs and VJBs in Great Britain).

elections run on the same day. Unit costs for standalone, 2-way combination and 3-way combination are used in the model. Due to a lack of data, in cases where there are expected to be 4 concurrent elections, the unit cost for 3-way combination is used. This could lead to a small overestimate of the costs in these cases. The appropriate unit cost is then multiplied by the expected number of 16- and 17-year-old electors and the expected number of local elections⁶⁵ each year to give the total cost. The unit costs are shown below:

- i. Standalone - £2.85 per elector per election
- ii. 2-way combination - £1.35 per elector per election
- iii. 3-way combination - £1.09 per elector per election

153. In Scotland and Wales 16- and 17-year-olds can already vote in local and devolved administration elections. But the turnout is assumed to increase with a greater amount of 16- and 17-year-olds on the register, meaning there will be increased costs for LAs. **The same factor is used as for Register to Vote and absent vote costs to estimate the additional conduct costs for Welsh and Scottish LAs.**

By-Election Conduct Costs

154. **Outside of the regularly scheduled elections there are also by-elections that 16- and 17-year-olds will be able vote in.** The following number of by-elections are assumed to happen each year:
- i. LA by-elections: 63
 - ii. Parliamentary or PCC by-elections: 0.9
 - iii. Parish by election and local referendums: 196.
155. The size of the 16- and 17-year-olds electorate for these elections is estimated as the average by-election electorate size, multiplied by the percentage change in the electorate when 16- and 17-year-olds are added to the franchise (based on previous assumptions described).
156. For LA, Parish by election and local referendums the cost per elector is assumed to be the same as for scheduled elections. For UKPGEs and PCC elections the cost per electors is calculated based on the total modelled costs for these elections divided by the expected number of electors.
157. The total by-election costs are estimating by multiplying the expected number of by-elections, the expect number of electors and the unit cost.

Northern Ireland: Conduct Costs

⁶⁵ Since the last version of the Impact Assessment, this modelling has been updated to reflect changes in the election cycle, leading to a reduction in costs.

158. **Conduct costs (for UKPGEs, Assembly Elections, and Council Elections) are calculated based on the existing registration costs provided by the EONI multiplied by the expected percentage increase of the franchise.** These costs are also uplifted by population growth and the completeness ratio, as described for registration costs.
159. To estimate the costs for candidate mailings in UKPGEs and by-elections in Northern Ireland, the costs for GB are multiplied by the ratio of the population in Northern Ireland to the population of GB.
160. **Conduct costs are estimated to be between £11.1 million and £33.3 million, with a central estimate of £22.2 million (2025/26 prices, 10-year PV).**

Communication costs

Wider communications costs

161. **Wider communications costs are calculated using the same methodology for GB and Northern Ireland.** These costs are estimated using the number of eligible 16- and 17-year-olds multiplied by the costs of sending a second-class letter⁶⁶.

Looked-after children costs

162. **LAs will have a duty to promote the policy to relevant children they have care of.** The number of 16- and 17-year-olds looked after by LAs^{67,68,69} is uplifted by population growth^{70,71,72} to reflect demographic changes. This is then multiplied by the cost of sending a 2-sheet letter via Notify⁶⁶ to estimate the total costs. This part of the policy will only apply in GB.
163. **Communication costs of the Votes at 16 policy are estimated between £1.1 million and £3.3 million, with a central estimate of £2.2 million (2025/26 prices, 10-year PV).**

Electoral Commission Costs

164. **The EC has assessed the impact of the Votes at 16 policy on the Commission and estimated the cost it will incur supporting implementation of the policy.** The main driver of the EC costs are the costs associated with public awareness campaigns. Wider staffing costs associated with the Votes at 16 policy have been

⁶⁶ Pricing – Notify, 2025

⁶⁷ Children looked after in England including adoptions – DfE, 2024

⁶⁸ Children looked after - StatsWales, 2024

⁶⁹ Children's Social Work Statistics - Scottish Government, 2024

⁷⁰ Subnational population projections for England - Office for National Statistics, 2020

⁷¹ National population projections: 2021-based - Stats Wales, 2024

⁷² Projected Population of Scotland: 2020-based - National Records of Scotland, 2023

excluded, in line with the treatment of MHCLG departmental staffing costs in this impact assessment.

165. **Detailed planning of the work required will be undertaken in parallel with the implementation of the policy.** Cost estimates are therefore indicative and based on the EC's current understanding of the proposed changes, as well as learning from the implementation of other major changes in the democratic process.
166. **Electoral Commission costs are estimated between £19.9 million and £59.6 million, with a central estimate of £39.8 million (2025/26 prices, 10-year PV).**

F.1.2.2 Indirect costs

167. There are no monetisable indirect costs resulting from this policy.

F.1.2.3 Direct benefits

168. There are no monetisable direct benefits resulting from this policy.

F.1.2.4 Indirect benefits

169. There are no monetisable indirect benefits resulting from this policy.

F.1.2.5 Summary – Business Net Present Value (BNPV), Net Present Social Value (NPSV), Equivalent Annual Net Direct Cost to Business (EANDCB)

170. Under the central scenario, the estimated total quantified benefits and costs are £0 and £88.0 million, respectively, which provides **a NPSV for Votes at 16 under Option 1 of around -£88.1 million (2025/26 prices) over the 10-year appraisal period.**

Table 4: Summary of monetised impacts for Votes at 16 (£m, 2025/26 - 2034/35)

Impact	Scenario		
	Low	Central	High
Benefits			
Total benefits	-	-	-
Costs			
Registration	11.4	22.8	34.2
Canvass	0.5	1.0	1.5
Conduct	11.1	22.2	33.3
Communications	1.1	2.2	3.3
Electoral Commission	19.9	39.8	59.6
Total costs	44.0	88.1	132.1
NPSV	-44.0	-88.1	-132.1

Figures may not sum due to rounding

171. As there is inherent uncertainty with modelling the Votes at 16 policy, analysis has been conducted to estimate the upper and lower bound of these estimates. 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 £44.0 million and £0, respectively, thus resulting in **an estimated NPSV of -£44.0 million (2025/26 prices, 10-year PV).**
 - Under the high scenario, the estimated quantified total costs and benefits are £132.1 million and £0, respectively, leading to **an estimated NPSV of -£132.1 million (2025/26 prices, 10-year PV).**
172. **Further sensitivity analysis has been conducted in section H** that shows the change in outputs when the estimated completeness of the electoral register for 16- and 17-year-olds, the most sensitive assumption, is adjusted.
173. **The BNPV and EANDCB are 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 available evidence on this and it is therefore not proportional to monetise it.

F.1.3 Non-monetised impacts

F.1.3.1 Direct costs

174. **The digital systems used for applying to register to vote, for an absent vote or a VAC may require changes to support the registration of younger people.** The exact nature of these changes is yet to be defined, and any costs will be commercially sensitive. Therefore, this cost is not monetised.
175. **There will be a time cost for newly enfranchised electors who will be dealing with registration and voting processes for the first time.** For many young people, preparing to vote may require a substantial time investment in order to register (potentially navigating government digital services for the first time to do so), to follow voting process and to decide who to vote for. This policy introduces this time cost at an earlier age, and may be higher for younger first time voters due to them having additional new systems to navigate such as government digital services.
176. **Lowering the voting age would require the Chief Electoral Officer (CEO) in Northern Ireland to share details of 16- and 17-year-olds with the courts, even though they cannot serve on juries.** This is because the law requires the CEO to share the names and details of all registered electors with the court service in Northern Ireland for the purpose of drawing up jury lists, regardless of age. As

individuals under 18 are not eligible to serve on juries, this would create unnecessary administrative issues for the court service. To address this, there is an intention to amend the law so that the CEO will not be required to share the details of 16- and 17-year-olds with the court service in Northern Ireland. This change will be made through secondary legislation, and so the relevant provisions are not included in this Bill.

F.1.3.2 Indirect costs

177. **There is likely to be a time cost for parents and families of newly enfranchised young people** who may need to support each of the steps involved. While this support might have been needed at age 18, the change means these costs are incurred at a younger age, when individuals may be less familiar with civic processes and more reliant on family guidance.
178. **There is also an additional resource implication arising from the collaborative development of this policy**, with staff time from other government departments, principally DfE, contributing meaningfully to its design. There is also a potential impact on education staff. However, these contributions are not considered significant in cost terms and have therefore not been monetised.

F.1.3.3 Direct benefits

179. **The non-monetised direct benefits associated with the Votes at 16 policy include the representation of younger people's views in elections, as well as the potential strengthening of democratic engagement and voter turnout among them.** Expanding the franchise to give younger people the vote will enable elections to reflect the views of a wider set of individuals in the population.
180. Academic evidence suggests that **lowering the voting age may promote young people becoming more democratically engaged citizens who are more likely to turn out at elections** if introduced alongside the right conditions. This process could create a more engaged electorate and even lead to an increase in turnout over time. However, this evidence is mixed.
181. **Research in Scotland suggests that young people who were eligible to vote for the first time at the age of 16-17 were more likely to turnout in future⁷³.** It should be noted that this habituation is not necessarily guaranteed in the long term⁷⁴, and a person's experiences when they are enfranchised may be fundamental to whether it then becomes a habit⁷⁵. Another of the main studies on

⁷³ [Longer-Term Effects of Voting Age 16: Higher Turnout Among Young People in Scotland - Eichhorn and Huebner, 2025](#)

⁷⁴ [Is Voting Really Habit-Forming and Transformative? Long-Run Effects of Earlier Eligibility on Turnout and Political Involvement from the UK - Jessen, Kuehnle and Wagner, 2021](#)

⁷⁵ [How Young People in Scotland Experience the Right to Vote at 16: Evidence on 'Votes-at-16' in Scotland from Qualitative Work with Young People – Huebner, 2021](#)

this topic, looking at Austria⁷⁶, has since been found to have been based on a coding error⁷⁷. Wider literature is mixed^{74,78}.

182. Initial evidence from Scotland could support the argument that **lowering the voting age increases turnout among younger people**; and turnout amongst young people tends to be high, and higher than their slightly older peers. At the 2014 Scottish independence referendum, 75% of registered 16- and 17-year-olds claimed to have turned out to vote, significantly higher than amongst 18–24-year-olds (54%), although still much lower than overall turnout (85%)⁷⁹. This effect appears to be lasting; **young people who were enfranchised at 16 or 17** (both the first cohort and later cohorts) **were more likely to vote in the 2021 Scottish Parliament elections than young people who were first eligible at 18 or older**⁸⁰. However, this may have been impacted by an increased polarisation around the independence referendum. In Wales, turnout among 16- and 17-year-olds in the 2021 Senedd election was broadly consistent with other young people⁸¹, however due to this first experience of Votes at 16 in Wales occurring at a time of educational disruption due to the COVID-19 pandemic some academics have described it as a ‘false start’⁸², also noting alongside others that more time and research is needed to fully assess impact⁸³.
183. Lowering the voting age would allow young people to register to vote from the age of 14, and to vote from age 16. As a result, **for many young people, registering to vote could become their first interaction with online government services**. Designing these services effectively to be easy to use and secure could help to promote trust in government digital services.
184. **Implementation of the Votes at 16 policy will also provide greater alignment of election processes across the UK**. Currently, 16- and 17-year-olds have the right to vote in devolved and local elections in Scotland and Wales. Introducing Votes at 16 for reserved elections across the UK would increase alignment across the nations across the UK and across different election types, making these easier for administrators to manage and for electors to understand.

F.1.3.4 Indirect benefits

⁷⁶ [Voting at 16: Intended and unintended consequences of Austria's electoral reform – Bronner and Ifkovits, 2019](#)

⁷⁷ [Revisiting eligibility effects of voting at 16: Insights from Austria based on regression discontinuity analyses - Graf, Partheymüller, Bronner, and Kritzing, 2024](#)

⁷⁸ [Is voting transformative? Expanding and meta-analyzing the evidence. Holbein, Rangel, Moore and Croft, 2023](#)

⁷⁹ [Scottish independence referendum - Electoral Commission, 2014](#)

⁸⁰ [Votes at 16 in Scotland - Eichhorn and Hübner, 2022](#)

⁸¹ [May 2021 elections in Wales - Electoral Commission, 2021](#)

⁸² [A False Start - Griffiths, Lerner, Jones and Poole, 2025](#)

⁸³ [Longer-Term Effects of Voting Age 16: Higher Turnout Among Young People in Scotland - Eichhorn and Huebner, 2025](#)

185. **The Votes at 16 policy is planned to be implemented alongside communications, engagement and education initiatives for young people, to help them become engaged and informed voters.** Academic evidence outlines a range of different possible approaches to this, which could have positive results in enhancing democratic engagement, however there is limited evidence of its impact.
186. **In Scotland, schools sought to enable young people to confidently participate in political discussions ahead of the 2014 independence referendum.** Research found that although teachers faced various obstacles to deliver this, the impact was largely positive⁸⁴.
187. **In Wales, young people who had an opportunity to discuss votes at 16 either at school or in a youth club or society expressed higher likelihood to vote and greater interest in the 2021 Senedd election than those who had not** (though the authors of this study highlighted that they could not rule out the possibility that the former were already more politically engaged). Additionally, the introduction of Votes at 16 in Wales during the COVID-19 pandemic limited the opportunity for formal and informal discussion in contexts such as education⁸⁵.
188. **In Estonia, following the lowering of the voting age for local elections in 2015, the government developed a guideline for political discussions in schools,** which was developed with youth organisations and intended to be binding and non-partisan. The guide was revised after the first elections in 2017, to make it more effective in practice⁸⁶.
189. **In Austria, legislation to enhance the teaching of democracy and politics in schools was implemented concurrently to lowering the voting age^{87,88,89}.** Their educational provision included a web platform which enabled teachers to access materials and initiatives when they lowered the voting age to 16. Their curriculum shifted to focus upon developing competencies and skills rather than factual knowledge.

F.2 Improving registration

F.2.1 Methodology

⁸⁴ [Votes at 16 in Scotland - Eichhorn and Hübner, 2022](#)

⁸⁵ [A False Start - Griffiths, Lerner, Jones and Poole, 2025](#)

⁸⁶ [Making Votes-at-16 Work in Wales: Lessons for the Future – Eichhorn, Smith, Mycock, Loughran & Hübner, 2023](#)

⁸⁷ [Modernising Elections: How to Get Votes Back – Patel & Swift, 2024](#)

⁸⁸ [Votes at 16: What Effect Would It Have? – Renwick, 2015](#)

⁸⁹ [Votes at 16 Without Investment in Political Education Is a Missed Opportunity: Learning from Scotland and Wales – Hübner, Smith, Loughran, Mycock & Eichhorn, 2022](#)

190. The modelling for the Improving Registration policy follows a multistage approach to assess the volume of additional registrations and the associated costs.

Stage 1: Estimate volume of incomplete register entries

191. **The most recent Completeness and Accuracy report published by the EC⁹⁰ is used to establish the baseline completeness of electoral registers** as 86% for GB and 83% for Northern Ireland, working out to a weighted average of 85.9% for the UK. This corresponds to around 7.7 million people who were not correctly registered or were missing entirely from the register in December 2022. Adjusting this figure in line with ONS population projections⁹¹, the total volume of incorrect and missing registrations, under the counterfactual scenario, is estimated for each year of the appraisal period.

Stage 2: Assumptions of new completeness rate under the policy scenario

192. **The assumption for the completeness of UK registers at the end of the appraisal period is informed by the completeness of Australian electoral registers, which was 92% as at 30th June 2024^{92,93}** – equivalent to an increase of 6 percentage points relative to the GB baseline of 86%. In the central scenario, the model assumes that, by the end of the appraisal period, the completeness of UK registers will have increased by 3 percentage points, equal to half of the total difference between the GB baseline and the Australian completeness rate. The overall increase is assumed to be achieved by uniform annual increases of 0.37 percentage points, in each of the eight years from 2027/28 to the end of the appraisal period. When weighted in accordance with the respective electorates of Great Britain and Northern Ireland, this works out to a final UK register completeness rate of 88.9% by the end of the 10-year appraisal period.

Stage 3: Estimate the additional complete register entries in each year

193. **The difference between the assumed future completeness rate and the baseline completeness rate** (86% for GB, 83% for NI) **is multiplied by the eligible electors** (highlighted in Stage 1) in each year of the appraisal period. This results in a total estimated figure of 1.7 million additional correct register entries by the end of the appraisal period.

Stage 4: Calculate costs associated with additional register entries

⁹⁰ [Electoral registers in the UK - Electoral Commission, 2023](#)

⁹¹ [National population projections – Office for National Statistics, 2025](#)

⁹² [Size of the electoral roll and enrolment rate – Australian Electoral Commission, 2024](#)

⁹³ [Annual Roll Integrity Review – Australian Electoral Commission, 2024](#)

194. **The final stage is to calculate the various cost lines, with methodology for the costs outlined in the following section.** In line with the policy implementation schedule, registration and conduct costs are modelled from the 2027/28 financial year onwards.
195. **The most impactful assumption on the total modelled cost is the assumption for the new completeness rate** following the policy interventions, described in Stage 2.

F.2.2 Monetised impacts

F.2.2.1 Direct costs

Registration application processing costs

196. The estimated number of additional registrations is multiplied by the assumption for the staff time cost to process a registration application of £0.71 (2025/26 prices)⁹⁴.
197. **Registration application processing costs are estimated to be between £0.5 million and £1.6 million, with a central estimate of £1.0 million (2025/26 prices, 10-year PV).**

Postal correspondence costs

198. **The model includes a provision for the overall cost of corresponding by post with electors.** The unit cost per postal communication is assumed to be £1.14 (2025/26 prices), based on the cost of sending an Invitation to Register by post. The overall cost is calculated assuming that a number of postal communications equal to 60% of the additional annual registrations will be sent, each year from 2027/28 to the end of the appraisal period.
199. **Postal correspondence costs are estimated to be between £0.5 million and £1.5 million, with a central estimate of £1.0 million (2025/26 prices, 10-year PV).**

Duplicate application costs

200. **It is possible that interventions designed to increase completeness and accuracy may inadvertently lead to some duplicate electoral registration applications being made.** While efforts will be made to avoid this as part of the detailed policy design, an allowance has been made here for costs associated with duplicate applications.

⁹⁴ Internal survey of EROs – MHCLG, 2025 (Unpublished)

201. **The cost of processing duplicate registration applications is estimated** by multiplying the average duplicate rate across LAs holding elections in a given year, ranging between 46.7% and 47.5%, depending on the year⁹⁵, by the number of additional registered electors at given completeness levels from the model. The resulting volume of duplicate applications is then multiplied by the assumed staff time cost to process a registration application of £0.71 (2025/26 prices)⁹⁶.
202. **Correspondence costs are also included.** It is assumed that 19.4% of Register to Vote applicants do not consent to be contacted by email⁹⁷ and therefore receive postal correspondence in relation to their duplicate application. The unit cost of postal correspondence for each of these applicants is assumed to be the same as the average cost of sending an ITR of £1.14 (2025/26 prices)⁹⁷. Email correspondence, applicable to the remaining 80.6% of duplicate applicants, is assumed to incur no cost.
203. **Duplicate application costs are estimated to be between £0.3 million and £1.0 million, with a central estimate of £0.6 million (2025/26 prices, 10-year PV).**

In-person voting costs

204. **The conduct cost per in-person voter of £0.18 (2025/26 prices)⁹⁸ is multiplied by the estimated number of additional registered electors who will be expected to cast a vote in an election each year**, using turnout rate from the last set of elections as a proxy, of 60.4% in UKPGE years⁹⁹ and 31.6% in non-UKPGE years⁹⁹. This is then weighted by the proportion of people who vote in-person, given the election type occurring in that year: 66.1% for UKPGE and 67.8% for local elections¹⁰⁰.
205. **In-person voting costs are estimated to be between £0.1 million and £0.3 million, with a central estimate of £0.2 million (2025/26 prices, 10-year PV).**

Postal voting costs

206. **The conduct cost per postal voter of £3.36 (2025/26 prices)⁹⁸ is multiplied by the estimated number of additional registered electors who will be expected to cast a vote in an election each year**, using a turnout rate of 60.4% in UKPGE years and 31.6% in non-UKPGE years¹⁰¹. This is then weighted by the proportion

⁹⁵ [Electoral registration in Great Britain in 2024 - Electoral Commission, 2025](#)

⁹⁶ Internal survey of EROs - MHCLG, 2025 (Unpublished)

⁹⁷ Register to Vote application data - MHCLG, 2020-2025 (Unpublished)

⁹⁸ [Costs of the 2019 UK Parliamentary General Election – MHCLG, 2025](#)

⁹⁹ [2024 UK Parliamentary general election and the May 2024 elections - Electoral Commission, 2024](#)

¹⁰⁰ [Evaluation of Electoral Integrity Programme: public opinion research wave 3 – MHCLG, 2025](#)

¹⁰¹ [2024 UK Parliamentary general election and the May 2024 elections - Electoral Commission, 2024](#)

of people who vote by post, given the election type occurring in that year: 33.9% for UKPGE years and 32.2% for non-UKPGE years¹⁰².

207. **Postal voting costs are estimated to be between £0.9 million and £2.8 million, with a central estimate of £1.8 million (2025/26 prices, 10-year PV).**

Voter Authority Certificate costs

208. **The additional registered electors may also choose to apply for a VAC to use as voter identification when voting in elections.** The associated costs are estimated using the methodology from the Elections Act 2022 Voter ID Impact Assessment¹⁰³. Two cost lines are modelled in relation to VAC: the cost of processing VAC applications, and the production cost for paper VACs.
209. **It is assumed that the percentage of registered electors who apply for a VAC is 0.28% in general election years¹⁰⁴.** In years without a general election, it is assumed that 0.24% of registered electors in areas holding local elections will apply for a VAC¹⁰⁵. It is assumed that 90% of VAC applications will lead to a VAC being printed¹⁰⁶.
210. **The total cost is calculated by multiplying the number of applications and VACs sent to print by the unit costs** (adjusted to 2025/26 prices) for processing applications and printing VACs used in the Elections Act 2022 Voter ID Impact Assessment.
211. **VAC costs are estimated to cost between <£0.1 million and <£0.1 million, with a central estimate of <£0.1 million (2025/26 prices, 10-year PV)¹⁰⁷.**

Electoral Commission Costs

212. **The EC has assessed the impact of the improving registration policy on the Commission and estimated the cost it will incur supporting implementation of the policy.** Wider staffing costs associated with the improving registration policy have been excluded, in line with the treatment of MHCLG departmental staffing costs in this impact assessment.
213. **Detailed planning of the work required will be undertaken in parallel with the implementation of the policy.** Cost estimates are therefore indicative and based

¹⁰² Evaluation of Electoral Integrity Programme: public opinion research wave 3 – MHCLG, 2025

¹⁰³ The Voter Identification Regulations - MHCLG, 2022

¹⁰⁴ Voter Authority Certificate application data - MHCLG, 2024 (Unpublished)

¹⁰⁵ Voter Authority Certificate application data - MHCLG, 2023 (Unpublished)

¹⁰⁶ Voter Authority Certificate application data - MHCLG, 2023-25 (Unpublished)

¹⁰⁷ The total estimated costs for VAC in the model are non-zero, but round to £0.0m when rounded to the nearest £0.1m.

on the EC's current understanding of the proposed changes, as well as learning from the implementation of other major changes in the democratic process.

214. **Electoral Commission costs are estimated between £0.2 million and £0.7 million, with a central estimate of £0.5 million (2025/26 prices, 10-year PV).**

F.2.2.2 Indirect costs

215. There are no monetisable indirect costs resulting from this policy.

F.2.2.3 Direct benefits

216. There are no monetisable direct benefits resulting from this policy.

F.2.2.4 Indirect benefits

217. There are no monetisable indirect benefits resulting from this policy.

F.2.2.5 Summary – BNPV, NPSV, EANDCB

218. Under the central scenario, the estimated total quantified costs and benefits are £5.2 million and £0, respectively, which provides **a NPSV for Improving Registration under Option 1 of around -£5.2 million (2025/26 prices) over the 10-year appraisal period.**

Table 5: Summary of monetised impacts for Improving Registration (£m 2025/26 - 2034/35)

Impact	Scenario		
	Low	Central	High
Benefits			
Total benefits	-	-	-
Costs			
Processing new registration applications	0.5	1.0	1.6
Postal correspondence with new applicants	0.5	1.0	1.5
Duplicate application costs	0.3	0.6	1.0
VAC processing and production	<0.1	<0.1	<0.1
In-person voting	0.1	0.2	0.3
Postal voting	0.9	1.8	2.8
Electoral Commission	0.2	0.5	0.7
Total costs	2.6	5.2	7.8
NPSV	-2.6	-5.2	-7.8

Figures may not sum due to rounding

219. As there is inherent uncertainty with modelling the Improving Registration policy, analysis has been conducted to estimate the upper and lower bound of these estimates. 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 £2.6 million and £0, respectively, thus resulting in **an estimated NPSV of -£2.6 million (2025/26 prices, 10-year PV)**.
- Under the high scenario, the estimated quantified total costs and benefits are £7.8 million and £0, respectively, leading to **an estimated NPSV of -£7.8 million (2025/26 prices, 10-year PV)**.

220. **Further sensitivity analysis has been conducted in section H** that shows the change in outputs when the estimated completeness of the electoral register, the most sensitive assumption, is varied.
221. **The BNPV and EANDCB are estimated to be £0**, as there are no direct impacts on businesses that fall within the scope of these measures.
222. **While some businesses may be indirectly affected by the open register becoming opt-in, it is not proportional to quantify due to the lack of available information around the profit margin of the businesses involved. Additionally, they are second-order effects and are therefore excluded from the BNPV and EANDCB.** For example, if fewer individuals choose to make their information publicly available, the volume of data accessible to these businesses to sell on or use for purposes could decrease, potentially requiring them to adapt. However, these are considered second order effects, as they are not a direct result of the policy itself and instead depend on behavioural responses that are difficult to predict. As such, they are excluded from the BNPV and EANDCB.

F.2.3 Non-monetised impacts

F.2.3.1 Direct costs

223. **Implementing new registration systems poses practical challenges including resource investment to develop and maintain infrastructure and train staff.** The digital systems used for voter registration may require changes to support the implementation of the policy. The exact nature of these changes is yet to be defined, and any associated costs will be commercially sensitive. Therefore, these costs have not been monetised at this stage.

F.2.3.2 Indirect costs

224. **There will be an additional staff cost to MHCLG to implement effective data sharing systems and infrastructure and work with other government departments to build the appropriate services.** The development of this policy has involved collaboration with several other government departments, particularly in relation to the assessment of government digital services. While these

contributions involve some staff time, they are not considered significant in cost terms and have therefore not been monetised.

225. **Other government departments may also incur some costs associated with supporting data-sharing arrangements, adapting existing digital services, and contributing to cross-government coordination.** While these contributions may involve potential system changes, the exact nature of these changes is yet to be defined, and will be commercially sensitive so have not been monetised.
226. As discussed above, **some businesses may be indirectly affected by the change to make the open register opt-in.** The full register, used for credit referencing purposes, will remain unaffected by the change. However, the open register, used for other commercial purposes including resale by agencies¹⁰⁸, will be affected by the change. While the change will not prevent the open register being used for these purposes, it may result in a reduction in the volume of available entries, depending on the proportion of electors who choose to opt-in under the new model. Should a large proportion of electors choose not to opt-in, it is possible the dataset may be too limited to retain its current utility, diminishing its commercial value. **As this impact is contingent on future elector behaviour and the resulting availability of data, it is deemed a second-order impact and therefore it is not monetised.** It is also worth noting, the number of voters opted out of the open register has grown steadily in recent years, making it a less useful resource. In England and Wales, the figure was around a third in 2013 and has grown each year since¹⁰⁸. According to data from the Office of National Statistics, in December 2019 27.4 million voters were opted out of the open register in England and Wales. This was 63% of the 43.7 million electors registered to vote in local elections.¹⁰⁹

F.2.3.3 Direct benefits

227. **All of the legislative interventions have the potential to improve the completeness and accuracy of registration to some extent,** as they make it easier for electors to register (assisted registration) or remove the burden of registering from electors (direct registration). This in turn would give a greater proportion of the population the opportunity to exercise their democratic right to vote.

Data sharing powers

228. In line with the Government's ambition to modernise services and in recognition that technological advances will continue, **the data sharing powers have been deliberately designed with broad scope to support both current policy**

¹⁰⁸ [Electoral Registers and Access to them - Johnston, 2025](#)

¹⁰⁹ [Electoral statistics, UK - Office for National Statistics, 2021](#)

objectives and provide flexibility for future developments. The new data sharing powers will make clear the ability for EROs, government departments, other public bodies across central and local government, the education sector and others to make new arrangements to share data in appropriate ways for electoral registration purposes.

229. **Using enhanced data may improve accessibility by reducing barriers citizens may currently face when registering to vote.** Through access to improved data, EROs could be better placed to facilitate more automated forms of registration, for example, by piloting ‘directly’ registering or updating entries they know to be eligible, or assisting eligible individuals to register and update current entries (as set out elsewhere in this legislation), by supporting applicants and presenting them with semi-pre-populated application forms.
230. **Enhanced data sharing capabilities could also enable EROs to more effectively identify individuals who are either not registered or incorrectly registered,** and carry out their existing duties to invite such people to register and ensure their registers are as complete and accurate as possible.
231. **While enhanced data sharing is expected to improve register completeness and accuracy, current evidence is limited and the scale of potential improvements remains uncertain.** Further legislation, which will set out the detail of data sharing agreements, piloting new registration methods, and testing data flows, will be essential to realising the full potential of these powers and ensuring their effective deployment.

Direct registration

232. **An important benefit of automated systems is that they are more inclusive of those with higher personal costs to registering,** such as those from lower socioeconomic groups who may have limited access to information about registering¹¹⁰.
233. **Research by the EC indicates there could be public support for automatic registration:** In 2024, approximately half of respondents (52%) to the EC’s Winter Tracker survey said automatic registration would be better than the current system¹¹¹. Additionally, 17% of respondents to the 2023 version of the survey said their satisfaction with the registration system would be most likely to increase ‘if it was possible to automatically be added to the electoral register when you receive your NINo aged 16’¹¹².

¹¹⁰ [Do text messages increase voter registration? Evidence from RCTs with a local authority and an advocacy organisation in the UK - Cheng-Matsumo, Foos, John & Unan, 2023](#)

¹¹¹ [Public attitudes 2024 - Electoral Commission, 2024](#)

¹¹² [Public attitudes 2023 - Electoral Commission, 2023](#)

234. **Evidence suggests that automatic/direct registration has the potential to increase the completeness of the register**, although more research would be beneficial in the UK context.
235. James & Garnett's (2023)¹¹³ cross national analysis of 159 countries' electoral registration systems finds that **automatic registration systems are seen to significantly increase register completeness by 0.53 points on a 1-5 scale, where the closer to 5 the better completeness**. The same study suggests automatic/direct registration also has the potential to improve accuracy; the effect is statistically significant, but smaller (0.32 points on the 1-5 scale described above). It is important to note, however, that this study relies on the subjective judgements of 'electoral integrity experts' as opposed to more objective data on completeness and accuracy.
236. In addition, two US studies find that automatic registration increases completeness. Although these studies were not conducted in the UK, **automatic registration appears to have had a positive effect in states of different sizes and characteristics**. The first study compared seven states (and Washington DC) to jurisdictions where automatic registration was not in place. It found that registrations increased by between 9% and 94%, depending on the state^{114,115}. The second study used statistical techniques and multiple data sources from 2012-2020. Across states, it finds that automatic registration increased registration rates by 3% and by 0.2% each month¹¹⁶.

Future of the Open Register

237. The policy change introduces a more robust standard of consent by requiring individuals to actively opt-in to the open register. This strengthens personal data autonomy and aligns with wider government objectives around digital safety and responsible data use, including commitments to uphold high standards of transparency, accountability, and individual control in the digital environment. **By reducing the risk of unintended or uninformed data sharing, the policy contributes to a safer digital infrastructure.**
238. Key electoral stakeholders have suggested that, in its current form, the Open Register may deter potential electors from registering due to the prospect of having their personal data sold on¹¹⁷. As a result, **the change to an opt-in system could**

¹¹³ [The Determinants of Electoral Registration Quality: A Cross-National Analysis – James & Garnett, 2023](#)

¹¹⁴ The large variation in effect size likely relates to differences in the way automatic registration was adopted and to variations in state characteristics. For example, automatic registration would likely have a greater impact when introduced in a state with a smaller proportion of eligible citizens already registered to vote.

¹¹⁵ [Automatic Voter Registration – Morris and Dunphy, 2019](#)

¹¹⁶ [The Registration and Turnout Effects of Automatic Voter Registration - McGhee, Hill and Romero, 2021](#)

¹¹⁷ [Sale of the Register of Electors – The Association of Electoral Administrators, 2019](#)

enhance public trust in the electoral registration system and in turn potentially have a small positive impact on registration rates.

F.2.3.4 Indirect benefits

239. Certain organisations are entitled to purchase copies of the full register and rely on this data to conduct credit checks and identity verification. If the move to an 'opt-in' model removes a deterrent to registration, it may result in more individuals being added to the full register. **This could improve the accuracy and coverage of the data available to such organisations, enhancing their ability to carry out these checks effectively and responsibly.** Moreover, removing the deterrent could also benefit the individuals who are able to get credit ratings after getting added to the register.

F.3 Voter ID

F.3.1 Methodology

240. **It is assumed that allowing in-date UK-authorized bank cards to be used as an accepted form of voter identification at polling stations will result in some additional costs to government and LAs.** While bank cards are already widely held by electors and do not require new issuance systems, costs are expected to arise from updates to communications campaigns. These costs have been modelled based on information provided by the EC regarding planned updates to national communications and guidance for LAs.
241. **The EC has indicated that the introduction of bank cards will not place a significant burden on communications activity.** However, it will require updates to existing campaigns and guidance materials, which will result in additional costs. These have been estimated based on information provided by the EC on the planned updates and the advice they intend to issue to LAs.
242. **The AEA has indicated that integrating bank cards into polling station guidance would not generate significant operational burdens,** provided the changes and specificities of the policy (namely, that they are in-date and are UK-authorized) are clearly communicated and incorporated into routine training.
243. **The potential impact on elector behaviour and any resulting impact on costs have not been modelled, as the scale and direction of these effects are highly uncertain and therefore difficult to estimate with precision.** While it is clear that some individuals experienced a barrier to in-person voting under the current photo ID requirement, robust modelling of the impact of allowing bank cards to be used is not possible given the limited and variable evidence. For example, fewer than 1% of people who tried to vote in-person at the 2024 UKPGE were turned away and didn't come back later to vote because they didn't show an accepted form of ID.

This equates to nearly 16,000 individuals who weren't able to cast their vote¹¹⁸. A further 3% - 4% of non-voters cited ID as a factor in why they did not vote.¹¹⁹ Expanding the list of accepted IDs to include bank cards should help reduce the risk of voters not presenting a valid form of ID, particularly for individuals who face difficulty accessing the current set of approved IDs. However, there is limited evidence to reliably quantify the impact on voter behaviour.

F.3.2 Monetised impacts

F.3.2.1 Direct costs

Local Authority Communications

244. **It is assumed that there will be a justifiable benefit to LA-led communications activity to support the introduction of bank cards as an accepted form of voter identification, alongside the national campaign led by the EC.** LAs are well placed to tailor messaging to their communities, drawing on their understanding of local demographics and communication channels to help ensure that all voters are aware of the change. While both national and local campaigns will deliver consistent messages, they will do so through different forums and at different levels of engagement. Local communications are therefore expected to play a complementary role in reinforcing awareness and supporting effective implementation of the policy.
245. **Communications costs for LAs have been estimated using a per-elector approach, consistent with the methodology used in the 2022 Elections Bill Impact Assessment¹²⁰.** In that assessment, the average cost per elector for local communications activity to support the full voter identification policy was estimated at £0.21. This per-elector metric allows for variation in LA size and reflects the resource intensity for larger versus smaller areas. For the introduction of bank cards as an additional form of accepted ID, information from the EC indicates that updates required to LA communications should be relatively minor, involving proportionate changes to existing materials. To reflect the more limited scope of this change compared to the original voter ID policy, a scale factor of 2% has been applied to the previous average cost per elector, and uplifted to account for inflation.
246. **Total costs are then calculated by multiplying the adjusted cost per elector of £0.01 by the number of electors eligible to vote** in each year where communications campaigns are expected to take place.

¹¹⁸ Voter ID at the 2024 UK general election - Electoral Commission, 2024

¹¹⁹ Voter ID at the 2024 UK general election - Electoral Commission, 2024; Evaluation of Electoral Integrity Programme: public opinion research wave 3 – MHCLG, 2025

¹²⁰ Elections Bill Impact Assessment - Cabinet Office, 2022

247. **The total cost of LA-led communications activity around bank cards is estimated to be between £0.2 million and £0.6 million, with a central estimate of £0.4 million (2025/26 prices, 10-year PV).**

Electoral Commission Costs

248. **The EC will be responsible for public awareness activities across GB** to ensure that all voters, including those who may face barriers to meeting current ID requirements, are aware of the change and understand how bank cards can now be used as an accepted form of identification at polling stations, as well as the specific caveats to their usage, namely that they must be UK-authorized and in-date. The EC will also be responsible for providing updated guidance and support to ROs and electoral administrators as they prepare for and deliver the change.
249. **The EC has assessed the impact of the voter identification policy on the Commission and estimated the cost it will incur supporting implementation of the policy.** Detailed planning of the work required will be undertaken in parallel with the implementation of the policy. Cost estimates are therefore indicative and based on the EC's current understanding of the proposed changes, as well as learning from the implementation of other major changes in the democratic process.
250. **Electoral Commission costs are estimated to be between £0.1 million and £0.3 million, with a central estimate of £0.2 million (2025/26 prices, 10-year PV).**¹²¹

F.3.2.2 Indirect costs

251. There are no monetisable indirect costs resulting from this policy.

F.3.2.3 Direct benefits

252. There are no monetisable direct benefits resulting from this policy.

F.3.2.4 Indirect benefits

253. There are no monetisable indirect benefits resulting from this policy.

F.3.2.5 Summary – BNPV, NPSV, EANDCB

254. Under the central scenario, the estimated total quantified benefits and costs are £0 and £0.6 million, respectively, which provides **a NPSV for Voter Identification under Option 1 of around -£0.6 million (2025/26 prices) over the 10-year appraisal period.**

¹²¹ These are not inflated or discounted as they have directly been provided by the EC.

Table 6: Summary of monetised impacts for voter identification (£m, 2025/26 - 2034/35)

Impact	Scenario		
	Low	Central	High
Benefits			
Total benefits	-	-	-
Costs			
LA communications	0.2	0.4	0.6
Electoral Commission	0.1	0.2	0.3
Total costs	0.3	0.6	0.9
NPSV	-0.3	-0.6	-0.9

Figures may not sum due to rounding

255. As there is inherent uncertainty with modelling the voter identification policy, analysis has been conducted to estimate the upper and lower bound of these estimates. 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**¹²²:
- Under the low scenario, the estimated quantified total costs and benefits are £0.3 million and £0, respectively, resulting in **an estimated NPSV of -£0.3 million (2025/26 prices, 10-year PV)**.
 - Under the high scenario, the estimated quantified total costs and benefits are £0.9 million and £0, respectively, leading to **an estimated NPSV of -£0.9 million (2025/26 prices, 10-year PV)**.
256. **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 available evidence on this and it is therefore not proportional to monetise it. For example, the inclusion of in-date UK-authorized bank cards only as a form of identification could theoretically increase demand for bank cards authorised by the UK, but as ownership is already near-universal, any marginal increase is not expected to have a material impact on business revenues or costs. As such, this potential effect is excluded from the BNPV and EANDCB.

F.3.3 Non-monetised impacts

F.3.3.1 Direct costs

257. **Allowing bank cards to be used as Voter ID may increase the number of acceptable documents polling staff need to check, while the caveat of cards only being visibly in-date and from UK-authorized banks could introduce**

¹²² The +/- 50% range has not been applied to the cost line relating to Electoral Commission communications. Instead, a cost range for this cost line was provided by the EC directly, and has been used here.

complexity in ensuring Voter ID is valid. Electoral administrators will need to be trained to recognise such cards and apply clear guidance on verification standards. These changes can be incorporated into existing pre-election training at marginal cost, though additional clarity in national guidance may be required.

F.3.3.2 Indirect costs

258. Stakeholder feedback has previously emphasised the importance of public confidence in the Voter ID policy. **Allowing bank cards could prompt concerns about personation risk, even if actual incidence is very low.** Indeed, survey data on using bank cards in the polling station found that people were less comfortable showing their bank card (73% comfortable) than other prevalently used photographic ID (driving licence – 88% comfortable, travel / concessionary pass – 86% comfortable and passport – 79% comfortable).¹²³ Safeguarding measures, such as clear eligibility criteria and visual aids for polling staff, may help to mitigate these perceptions.
259. **Public confusion over eligibility may increase if the list of accepted IDs becomes more complex.** Although awareness of the ID requirement is high (84%), awareness of specific forms of accepted ID, such as the VAC, remains lower (58%), and varied across the population¹²⁴. However, data from a 2025 public opinion survey carried out by Verian on behalf of MHCLG found that the likelihood of carrying a physical bank card outside the home is higher than other types of ID (81% versus 56% who carry a driving licence) which suggests adding bank cards could be easily adopted in practice.

F.3.3.3 Direct benefits

260. **Allowing bank cards to be used as Voter ID aligns with efforts to ensure all legitimate voters are able to vote at the polling station, should they wish to.** Survey data collected by Verian on behalf of MHCLG in 2025 found that 92% of respondents have a physical bank card issued in the UK¹²⁵. In addition, the research highlighted that adding UK-authorised bank cards to the list of accepted IDs closes the gap to less than 1% who do not have a form of ID. This is in line with data from the World Bank, which indicates that 96.4-99.8% of people aged 15 and over in the UK have a bank account, while Financial Conduct Authority research confirms that even holders of basic bank accounts, typically used by those facing financial hardship, are issued debit cards¹²⁵.

¹²³ [Voter identification research - MHCLG, 2025](#)

¹²⁴ [Voter ID at the 2024 UK general election - Electoral Commission, 2024](#)

¹²⁵ [Financial Lives 2022 - Financial Conduct Authority, 2023](#)

261. **Expanding the accepted ID list to include these may reduce dependency on free VACs**, which have had relatively low uptake - just over 210,000 issued despite an estimated 750,000 eligible electors without photo ID.
262. **While precise effects on turnout are uncertain, it is plausible that the policy could reduce perceived barriers for vulnerable groups**, including those in socio-economically deprived areas, who may struggle to obtain formal photographic identification but do hold a bank card. As the research from Verian indicates, adding UK-authorised bank cards to the list of prescribed IDs closes the gap in ownership to less than 1% which should reduce the likelihood of electors being turned away at polling stations for not having an accepted form of ID.

F.3.3.4 Indirect benefits

263. **The policy could also support perceptions of fairness and accessibility of the Voter ID policy, especially if implemented alongside a clear communication campaign**. Around 87% of people were aware of the need to bring ID when voting in person, but awareness levels varied across the population and were lower for 18 to 24-year-olds (71%) and people from ethnic minority communities (76%)¹²⁶. Moreover, only 58% of people were aware of the VAC. In-date UK-authorised bank cards are more familiar, frequently carried, and may serve as a more accessible form of ID for day-to-day use.
264. Evidence from the Child Financial Harms Consortium and the Money and Pensions Service also suggests that debit card ownership is increasingly common among 16- to 18-year-olds, though data on 14- to 17-year-olds remains limited. **Therefore, inclusion of bank cards is anticipated to increase ownership levels of accepted ID types among young electors**, subject to further evidence on ownership patterns from upcoming research being conducted by MHCLG.

F.4 Candidate ID and Nomination Changes

F.4.1 Monetised impacts

265. There are no monetisable costs or benefits, either direct or indirect, resulting from this policy.

F.4.2 Non-monetised impacts

F.4.2.1 Direct costs

266. **The introduction of a statutory declaration and ID requirement may require updates to nomination forms, guidance materials, and data handling protocols**. Similarly, enabling party withdrawal of nominations will require changes

¹²⁶ Voter ID at the 2024 UK general election - Electoral Commission, 2024; Evaluation of Electoral Integrity Programme: public opinion research wave 3 – MHCLG, 2025

to nomination procedures. These are expected to be absorbed within existing administrative frameworks, with short-term resource implications for Returning Officers and suppliers.

267. **The requirement for candidates to provide proof of ID as part of the nominations process are likely to result in a small time cost for candidates as well as elections staff who complete the checks.** In the 2025 English local elections, a total of 8,624 candidates¹²⁷ stood across 1,637 seats in 23 LAs¹²⁸. This means that, on average, the change would have roughly resulted in an additional 375 ID checks per LA. The figure is much smaller from the recent UKPGE, where an average of seven candidates stood per constituency across the UK¹²⁹. Given the quantity of checks and short length of time they take, they are expected to be absorbed within existing administrative frameworks and so have been deemed disproportionate to monetise.

F.4.2.2 Indirect costs

268. **There may be a temporary increase in candidate queries and administrative handling, particularly around ID submission and revocation procedures.** Clear guidance and communications will be essential to minimise confusion and ensure consistent application across electoral areas.

F.4.2.3. Direct benefits

269. **The reforms will strengthen the integrity and transparency of the nominations process.** A statutory declaration reinforces candidate accountability, while the ID requirement provides a proportionate safeguard against impersonation. Enabling political parties to revoke support for a candidate prior to the close of nominations will allow parties to uphold standards and respond to emerging concerns during the nomination period, without significant impact on the administration of the election. It ensures voters are not misled about party endorsement and reduces reputational risk, particularly in high-profile contests where party affiliation is a key factor in voter decision-making.

F.4.2.4. Indirect benefits

270. **These changes are expected to enhance public confidence in the democratic process by addressing vulnerabilities in candidate nominations and ensuring voters are not misled about party endorsement.** They also support parties in upholding standards and provide Returning Officers with clearer procedures for managing nominations.

¹²⁷ [May 2025 local elections in England - Electoral Commission, 2025](#)

¹²⁸ [Local elections 2025: Results and analysis - Isabel Buchanan, 2025](#)

¹²⁹ [Who stood in the 2024 general election? - Rachael Harker, 2025](#)

F.5 Outcomes of the Elections Review

F.5.1 Methodology

271. **The Review of Electoral Conduct and Registration¹³⁰ was commissioned in October 2024 in response to growing pressures on the electoral system.** The Review identified several specific issues requiring attention including inefficiencies in the postal vote process, burdensome registration procedures and challenges with high levels of registration activity in the lead up to polls. It also highlighted challenges in securing polling venues, recruiting polling station staff, and ensuring that ROs have access to the resources they need.
272. Upon completion, the review's recommendations were grouped into the following categories:
- i. Electoral timetable
 - ii. Absent voting
 - iii. Electoral resourcing
 - iv. Elector information power
 - v. Election forms consolidation measures
273. **An assessment of all potential monetised and non-monetised impacts resulting from the policy has been undertaken¹³¹. The EC has identified a monetised cost it expects to incur as a result of the proposed changes.** The appraisal of the outcomes of the elections review policy areas also relies on a qualitative assessment of non-monetised impacts, where the assessment is proportionate to the scale and significance of the relevant policy.
274. **To support this appraisal, a theory of change has been developed for the most impactful category, the electoral timetable.** This is included in the annex and provides a structured framework for evaluating the key consequences of the electoral timetable reforms.

F.5.2 Monetised impacts

F.5.2.1 Direct costs

275. **The EC has assessed the impact of the outcomes of the elections review policy areas on the Commission and estimated the cost it will incur supporting implementation of the policies.** Detailed planning of the work required will be undertaken in parallel with the implementation of the policies. Cost estimates are therefore indicative and based on the EC's current understanding of

¹³⁰ Letter from Minister Norris to the electoral sector - MHCLG, 2024

¹³¹ The absent voting measures from the review are appraised in section F.6, alongside absent voting measures that did not originate from the review.

the proposed changes, as well as learning from the implementation of other major changes in the democratic process.

276. **Electoral Commission costs are estimated between £0.1 million and £0.2 million, with a central estimate of £0.1 million (2025/26 prices, 10-year PV).**

F.5.2.2 Indirect costs

277. There are no monetisable indirect costs resulting from this policy.

F.5.2.3 Direct benefits

278. There are no monetisable direct benefits resulting from this policy.

F.5.2.4 Indirect benefits

279. There are no monetisable indirect benefits resulting from this policy.

F.5.2.5 Summary – BNPV, NPSV, EANDCB

280. Under the central scenario, the estimated total quantified benefits and costs are £0 and £0.1 million, respectively, which provides a **NPSV for Outcomes of the Elections Review under Option 1 of around -£0.1 million (2025/26 prices) over the 10-year appraisal period.**

Table 7: Summary of monetised impacts for outcomes of the electoral review (£m, 2025/26 - 2034/35)

Impact	Scenario		
	Low	Central	High
Benefits			
Total benefits	-	-	-
Costs			
Electoral Commission	£0.1m	£0.1m	£0.2m
Total costs			
NPSV			

Figures may not sum due to rounding

281. To account for uncertainty, analysis has been conducted to estimate the upper and lower bound of these estimates. **A range of +/- 50% of the central scenario has been applied to create a high and low scenario¹³²:**
- Under the low scenario, the estimated quantified total costs and benefits are £0.1 million and £0, respectively, resulting in **an estimated NPSV of -£0.1 million (2025/26 prices, 10-year PV).**

¹³² The +/- 50% range has not been applied to the cost line relating to Electoral Commission communications. Instead, a cost range for this cost line was provided by the EC directly, and has been used here.

- Under the high scenario, the estimated quantified total costs and benefits are £0.2 million and £0, respectively, leading to **an estimated NPSV of -£0.2 million (2025/26 prices, 10-year PV).**

282. **The BNPV and EANDCB is expected to be £0** as there are no monetisable impacts on business as a result of this legislation being introduced.

F.5.3 Non-monetised impacts

F.5.3.1 Direct costs

283. **The proposed changes to the electoral timetable may require updates to electoral management software systems, training materials, and operational procedures.** While these changes are expected to be absorbed within existing administrative frameworks, there may be short-term resource implications for LAs and suppliers as they adapt to new deadlines and discretionary powers. These costs are not monetised due to their variability across LAs and the expectation that they will be offset by improved efficiency over time.

284. **While the elector information power may result in some additional digital costs for the Electoral Commission, the exact nature of these is yet to be defined.** Any digital costs are commercially sensitive and therefore not included in the Impact Assessment.

F.5.3.2 Indirect costs

285. **There is a potential for increased complexity in voter communications, particularly around changes to deadlines.** If not clearly communicated, these changes could lead to confusion among electors.. This may result in increased contact volumes for electoral services teams and a temporary rise in duplicate applications or voter queries. However, these impacts are expected to diminish as electors become familiar with the new arrangements.

F.5.3.3 Direct benefits

286. **The reforms are expected to improve the resilience and efficiency of electoral administration.** Adjustments to the electoral timetable will provide ROs with more time to process nominations and postal vote applications, reducing the risk of delays and errors.

287. **The introduction of a legislative power to require standardised election data from ROs and EROs will support the development of improved voter information services.** This will help electors access clear, consistent, and timely information about elections, reducing reliance on informal or inaccurate sources. By proactively addressing common queries and providing standardised information, this will also ease the administrative burden on electoral officials by

reducing the volume of individual enquiries received, particularly during busy election periods.

F.5.3.4 Indirect benefits

- 288. **The reforms introduced through the Elections Review could help to enhance public confidence in the electoral process.** By clarifying key deadlines, the changes will help ensure that more electors are able to successfully cast their vote, particularly in scenarios where voting arrangements become unviable close to polling day.
- 289. **Providing electors with clearer, more consistent information about elections, through a centralised data-sharing duty, will reduce confusion and reliance on informal or inaccurate sources.** This is expected to support more informed participation and reduce the risk of disengagement due to misinformation.

F.6 Absent Voting

- 290. **All absent voting measures are appraised in this section.** This includes those that originated from the elections review, as well as those that were developed separately.
- 291. **An assessment of all potential monetised and non-monetised impacts resulting from these measures has been undertaken.** The modelling outlined below aims to assess the monetised impacts associated with extending the postal vote reapplication maximum term from 3 to 5 years.
- 292. **The appraisal of absent voting measures originating from the review is based on a qualitative assessment of non-monetised impacts.** To support this, a theory of change (included in the annex) has been developed specifically for these measures, providing a structured framework for assessing their key impacts.

F.6.1 Methodology

- 293. **This analysis models the costs of maintaining the current three-year postal voting maximum term, as well as the costs of implementing a five-year maximum term with the reapplication window.** The difference between the two scenarios is used to estimate the costs and savings associated with the policy change.
- 294. **To model the cost of system, the number of registered postal voters (both at the start and the end of year), reapplications and other applications, and postal vote cancellations are modelled for each year starting from 2025/26.** As

the most recent statistics from the Electoral Commission¹³³ only cover up to the middle of this year.

295. **It is assumed that the number of registered postal voters remains broadly consistent across the two scenarios, with the policy affecting the timing of reapplications rather than overall registration levels.** The number of registered postal voters is therefore modelled against an expected trend in postal voting, which is based on the number of registered postal voters as of December 2025 (based on Electoral Commission statistics¹³⁴), uplifted by ONS population projections for Great Britain¹³⁵.
296. **To account for increased demand for postal voting around UKPGEs, this trend is also uplifted by a further 1.1% in years which a UKPGE is expected to occur.** This is based on the increase in postal voters from 2023 to 2024 based on Electoral Commission statistics¹³⁶. This increase is not carried forward into subsequent years. Hence, in the year following a UKPGE, the number of postal voters returns to the underlying trend, adjusted only for population growth.
297. **To account for the expansion of the franchise with Votes at 16, a further uplift of 3.1% is applied in 2027/28.** This reflects the ratio of the 16 plus population to 18 plus population in 2027/28, based on ONS population projections¹³⁷.
298. **To model the volumes flowing through the system, each year of the appraisal period is modelled sequentially, with volumes determined by the number of registered postal voters at the end of the previous year.** As a starting point, the expiry dates of postal voting arrangements held by all registered postal voters at the start of the modelled period are estimated. Based on data provided to MHCLG by the AEA¹³⁸, it is assumed that 85.4% of registered postal voters have arrangements expiring in 2025/26, with remaining 14.6% assumed to expire evenly across 2026/27 and 2027/28.
299. **The number of reapplications and cancellations is then estimated.** Based on the AEA data, it is assumed that 67.2% of postal voters with an expiring postal voting arrangement will reapply and the remaining 32.8% will not and consequently have their postal votes cancelled¹³⁹.
300. **The number of other applications made during the year is also estimated.** It is assumed that 7.3% of existing postal voters whose postal voting arrangement is not

¹³³ [Electoral registration at a glance - Electoral Commission, 2026](#)

¹³⁴ [Electoral registration at a glance - Electoral Commission, 2026](#)

¹³⁵ [National population projections - Office for National Statistics, 2026](#)

¹³⁶ [Electoral registration at a glance - Electoral Commission, 2026](#)

¹³⁷ [National population projections - Office for National Statistics](#)

¹³⁸ Survey of Local Authorities - AEA, 2026

¹³⁹ Survey of Local Authorities - AEA, 2026

due to expire in that year will reapply (for example due to a change in address). This assumption is consistent with the approach used for the methodology from the Elections Act 2022 OAVA IA¹⁴⁰; this methodology has since been updated to include the assumptions above and to reflect the latest administrative data and information from LAs¹⁴¹.

301. **The number of applications from electors who are not currently registered as postal voters is set to ensure that the total number of registered postal voters remain consistent with the expected trend.** For each year, the projected number of registered postal voters is compared with the expected trend of postal voters, and where a shortfall exists, it is assumed that additional new applications will occur. The number of such applications is set equal to the shortfall plus the number of cancellations occurring during the year, ensuring that the number of registered postal voters at the end of the year aligns with the expected trend.
302. **It is assumed that a baseline level of new postal vote applications will continue to be submitted each year, regardless of the overall number of registered postal voters.** Where the number of registered postal voters at the end of the previous year exceeds the trend, the number of new applications is assumed to be equal to 5% of projected postal voter population for that year.
303. **The number of registered postal voters at the end of the year is then estimated.** This is achieved by adding the number of new applications and subtracting the number of cancellations from the number of registered postal voters at the start of the year.
304. **The expiry dates of all applications made during the year are then estimated.** Under the three-year scenario and before 2028/29 in the five-year scenario (before the changes come into force), it is assumed that postal voters who submit a reapplication following expiry are assumed to have a new expiry date two financial years later, reflecting a validity period covering three 31st January reapplication deadlines. For postal voters who reapplied early or applied for the first time, these could be made after the 31st January reapplication deadline and therefore could expire three financial years later. It is assumed that 91.2% of these postal voter will expire two financial years later, with the rest expiring after three financial years. This figure is based on the proportion of postal vote applications that fall between April and January in 2025/26¹⁴².
305. **The expiry dates of applications submitted under the five-year maximum term after the policy changes come into force are estimated in a similar manner.** From 2028/29 onwards, it is assumed that a majority of postal voters with an

¹⁴⁰ [The Representation of the People \(Postal and Proxy Voting\) – MHCLG, 2023](#)

¹⁴¹ MHCLG Survey Data: Survey to members of the Elections Expert panel in August 2024

¹⁴² Postal Vote Application Administrative Data

expiring arrangement reapply during the reapplication window (October to January), however some are assumed to reapply earlier. Consistent with the assumption for non-expiring postal voters, it is assumed that 7.3% will reapply before the reapplication window, with the rest reapplying during the reapplication window. For those that reapply before the reapplication window, it is assumed that their renewed postal voting arrangement lasts for four financial years (covering five January 31st reapplication deadlines). For those that reapply after the reapplication window it is assumed that their postal voting arrangement last for five financial years (covering six January 31st reapplication deadlines).

306. **The expiry dates of early reapplications (meaning applications from postal voters whose arrangements are not expiring) and first-time applications submitted under the five-year maximum term are then estimated.** Depending on when the application is submitted relative to the reapplication window, applications are assumed to expire after either four or five financial years. It is assumed that 47.9% will expire after four financial years and the remaining expiring after five. This is based on the proportion of postal vote applications that fall between April and September in 2025/26¹⁴³.
307. **This process is repeated for each year of the appraisal period.** Once the modelled volumes have been estimated across the full appraisal period, total costs are calculated for both the three-year and five-year scenarios. The impact of the policy is then estimated as the difference in costs between the two scenarios.

F.6.2 Monetised impacts

F.6.2.1 Direct costs

308. **The primary cost associated with this policy relates to absent vote conduct costs in elections.** While the modelling aims to keep the number of registered postal voters broadly consistent, there are still differences year on year, with an increased number of registered postal voters in 5-year scenario. As a result, absent voting conduct costs are expected to be higher under the five-year scenario, due to the larger amount of registered postal voters.
309. **The costs associated with absent vote conduct in both scenarios are estimated following the methodology from the Elections Act 2022 OAVA IA¹⁴⁴.**
310. The costs in three-year scenario are then subtracted from the costs in the five-year scenario to give the costs of implementing the policy.

¹⁴³ Postal Vote Application Administrative Data

¹⁴⁴ The Representation of the People (Postal and Proxy Voting) – MHCLG, 2023

311. **Absent Voting costs are estimated between £2.7 million and £8.1 million, with a central estimate of £5.4 million (2025/26 prices, 10-year PV).**

F.6.2.2 Indirect costs

312. There are no monetisable indirect costs resulting from this policy.

F.6.2.3 Direct benefits

313. **The primary benefit associated with this policy relates to a reduction in absent vote registration and reapplication costs.** By extending the maximum term, fewer reapplication reminders, cancellation notices and reapplications are expected and therefore fewer will need to be processed. This is expected to reduce administrative costs for electoral administrators.
314. **The costs associated with absent vote conduct in both scenarios are estimated following the methodology from the Elections Act 2022 OAVA IA¹⁴⁵;** this methodology has since been updated to include the assumptions above and to reflect the latest administrative data and processing cost information from LAs¹⁴⁶.
315. **It is assumed that 50.6% of reapplication reminders and cancellation notices will be sent by paper, with the remaining sent by email.** This is based on data provided by the AEA¹⁴⁷. It is also assumed that 62% of applications will be submitted online, with the remaining submitted by paper or in-person. This based on data from the postal vote online portal¹⁴⁸.
316. **Prior to the costs being calculated the number of applications and reapplications is divided by the success rate for postal vote applications (96.4%).** This is to account for the fact that some applications will be rejected. This based on data from the postal vote online portal¹⁴⁹.
317. The costs in three-year scenario are then subtracted from the costs in the five-year scenario to give the savings of implementing the policy.
318. **Absent Voting benefits are estimated between £13.4 million and £40.2 million, with a central estimate of £26.8 million (2025/26 prices, 10-year PV).**

F.8.2.4 Indirect benefits

319. There are no monetisable indirect benefits resulting from this policy.

¹⁴⁵ The Representation of the People (Postal and Proxy Voting) – MHCLG, 2023

¹⁴⁶ MHCLG Survey Data: Survey to members of the Elections Expert panel in August 2024

¹⁴⁷ Survey of Local Authorities - AEA, 2026

¹⁴⁸ Postal Vote Application Administrative Data

¹⁴⁹ Postal Vote Application Administrative Data

F.8.2.5 Summary – BNPV, NPSV, EANDCB

320. Under the central scenario, the estimated total quantified benefits and costs are £26.8 million and £5.4 million, respectively, which provides a **NPSV for the Absent Voting under Option 1 of around £21.4 million (2025/26 prices) over the 10-year appraisal period.**

Table 8: Summary of monetised impacts for the Absent Voting (£m, 2025/26 - 2034/35)

Impact	Scenario		
	Low	Central	High
Benefits			
Registration and reapplication	13.4	26.8	40.2
Total benefits	13.4	26.8	40.2
Cost			
Conduct	2.7	5.4	8.1
Total costs	2.7	5.4	8.1
NPSV	10.7	21.4	32.0

Figures may not sum due to rounding

321. To account uncertainty, analysis has been conducted to estimate the upper and lower bound of these estimates. **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 £2.7 million and £13.4 million, respectively, resulting in **an estimated NPSV of £10.7 million (2025/26 prices, 10-year PV).**
 - Under the high scenario, the estimated quantified total costs and benefits are £8.1 million and £40.2 million, respectively, resulting in **an estimated NPSV of £32.0 million (2025/26 prices, 10-year PV).**
322. **The BNPV and EANDCB is expected to be £0** as there are no monetisable impacts on business as a result of this legislation being introduced.

F.6.3 Non-monetised impacts

F.6.3.1 Direct costs

323. **The proposed changes to the absent voting processes may require updates to electoral management software systems, training materials, and operational procedures.** While these changes are expected to be absorbed within existing administrative frameworks, there may be short-term resource implications for LAs and suppliers as they adapt to new deadlines and discretionary powers. These costs are not monetised due to their variability across LAs and the expectation that they will be offset by improved efficiency over time.

F.6.3.2 Indirect costs

324. **There is a potential for increased complexity in voter communications, particularly around changes to postal voting.** If not clearly communicated, these changes could lead to confusion among electors, especially for those who rely on postal voting. This may result in increased contact volumes for electoral services teams and a temporary rise in duplicate applications or voter queries. However, these impacts are expected to diminish as electors become familiar with the new arrangements.
325. **Allowing replacement postal votes to be issued after the postal vote application deadline could increase administrative complexity for Returning Officers close to polling day.** Elections teams would be required to process additional replacement postal vote requests during a period of heightened operational activity, exercise judgement on eligibility, and undertake the associated cancellation and reissue processes necessary to prevent double voting. However, this is considered proportionate to the benefit of ensuring that eligible electors are able to exercise their democratic right to vote.

326. F.6.3.3 Direct benefits

327. **The reforms are expected to improve the resilience and efficiency of electoral administration.** Changing the rules around postal vote reissue and cancellation will support electors whose voting arrangements become unviable close to polling day, helping to ensure that more votes are successfully cast and counted.
328. **Extending the postal vote maximum term is expected to reduce barriers for electors, making postal voting more accessible and convenient.** By reducing the frequency with which postal voters are required to renew their arrangements it also reduces the administrative effort required to maintain an active postal vote, helping to support continued participation in elections.
329. **Moving the postal vote application deadline earlier is expected to increase the likelihood that postal vote packs are received in sufficient time to be completed and returned before the close of poll.** By providing additional time for the printing, dispatch and return of postal vote packs, the change reduces the risk that electors are unable to cast their vote because their postal vote arrives too late to be used. This is expected to improve the reliability and effectiveness of the postal voting process for electors.

F.6.3.4 Indirect benefits

330. **The reforms introduced through the Elections Review could help to enhance public confidence in the electoral process.** By improving the reliability of postal voting, the changes will help ensure that more electors are able to successfully

cast their vote, particularly in scenarios where voting arrangements become unviable close to polling day.

F.7 Harassment and Intimidation

F.7.1 Monetised impacts

331. There are no monetisable costs or benefits, either direct or indirect, resulting from this policy.

F.7.2 Non-monetised impacts

F.7.2.1 Direct costs

332. **The proposed changes will require updates to electoral guidance and procedures, however additional administrative work is not anticipated.** As these changes apply to existing offences and requirements, they are unlikely to have significant effects to costs. For the aggravating factor, there may be some additional burden on prosecutors and courts, who prosecute and determine and sentence the underlying intimidatory offence. However, this will not increase cases, it will simply impact qualifying existing cases.

F.7.2.2 Indirect costs

333. There are no expected indirect costs relating to this policy. This is because these changes do not introduce new offences and are intended as deterrents, so are unlikely to cause significant changes in prosecution rates.

F.7.2.3 Direct benefits

334. The CSPL 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”¹⁵⁰. Following the 2024 UKPGE, public concerns about candidate intimidation increased, as 35% of respondents identified it as a problem (up from 27% one year earlier)¹⁵¹. **The changes introduced as part of this policy should act as a deterrent and ensure accountability for those who seek to intimidate, and in turn should reduce the incidence of intimidation.**
335. In a recent survey of candidates who stood for election on 2 May 2024 in England¹⁵², 5% of respondents said they experienced harassment, intimidation or threats outside their home. **Allowing candidates who act as their own election**

¹⁵⁰ Intimidation in Public Life - Committee on Standards in Public Life, 2017

¹⁵¹ Public attitudes 2025 - Electoral Commission, 2025

¹⁵² Candidate Survey May 2024 Data Tables - Electoral Commission, 2024

agent to provide a correspondence address for publication in the public notice of election agents will offer an important layer of protection. By limiting the exposure of personal information, this change will further help to reduce the risk of intimidation or harassment.

336. **This policy should 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.** By explicitly including electoral staff within the scope of disqualification orders, the policy will strengthen protections for those administering elections, ensuring they can carry out their duties free from threats or harassment.

F.7.2.4 Indirect benefits

337. **Reducing the risk of harassment and intimidation through various means could better political representation, particularly for those from protected groups.** For example, two thirds of women MPs say that progress on tackling abuse against women in politics impacts their willingness to stand for re-election¹⁵³ or MPs from ethnic minorities receive 15% more 'toxic' tweets than their white counterparts¹⁵⁴. Greater protection from intimidation as a result could improve the representation of candidates who run for elective office as it removes one of the barriers faced by those with protected characteristics. Moreover, reduced intimidation will allow those in public life to better carry out their duties and more effectively represent their communities.
338. **The changes should help campaigners to feel more empowered to voice their opinions, rather than censoring themselves for fear of intimidation and abuse.** A more wide-ranging political debate could enable voters to make more informed choices because they will have a better understanding of the candidates' positions and opinions.
339. **Enabling aggravated sentencing is likely to reinforce public confidence in the justice system's role in protecting democracy** by signalling that intimidation in an electoral context is a serious offence with meaningful consequences.

F.8 Political Finance

F.8.1 Methodology

340. **An assessment of all potential monetised and non-monetised impacts resulting from the policy has been undertaken. No monetised costs or benefits were identified.** As such, the appraisal of the outcomes of the political finance policies relies on a quantitative and qualitative assessment of non-

¹⁵³ [Creating a Gender Sensitive Parliament - Women & Equalities Committee, 2019](#)

¹⁵⁴ [Do ethnic minority MPs receive more Twitter abuse than their white counterparts? - Friar, 2020](#)

monetised impacts, where the assessment is proportionate to the scale and significance of the relevant policy.

Impact on number of individual donations

341. **To inform the assessment of non-monetised costs, the compliance of companies and limited liability partnerships that made donations in the year prior to the 2024 UKPGE was estimated** based on data collected by the Electoral Commission¹⁵⁵ and Companies House. This period was chosen as there was a high level of donations and interest in politics. It should be noted that this estimate only reflects compliance of the companies that donated in the specified period and therefore will not necessarily reflect the compliance of companies donating once the regulations come into effect.
342. **To appraise the impact of the profit test, data from the annual accounts filed with Companies House for companies that made donations in the sample period was used.** Only medium and large companies are required to include profit and loss statements in their annual accounts filed with Companies House¹⁵⁶. Medium and large companies represented roughly 34% of all companies who made a donation in the sample period. Profit after tax over the five previous calendar years can be considered in this test which is designed to ensure that in most cases at least five financial years fall within this window. As an approximation of this, profit after tax for all medium and large companies was summed across the five financial years previous to the donation, with any years with a reported loss disregarded from the sum. To assess the compliance of a donation, the sum of the donor company's profits was compared to the donation value, and where the profits exceeded the donation value, the donation was determined as compliant with the profit test.
343. In the absence of profit and loss data for small companies, it was assumed in the analysis that the rate of compliance with the profit test was the same for donations from small companies as that for medium and large companies. Based on that assumption, the 95% confidence interval¹⁵⁷ of compliance with the profit test across all donations in the sample was found. It is possible that small companies' compliance with this test could differ from the compliance for medium and large companies, which would affect the outcome of appraisal. Sensitivity analysis of this assumption is conducted in section H.2.3.
344. **To appraise the impact of the Headquarters (HQ) and Persons with Significant Control (PSC) tests, data from the Companies House PSC Register was**

¹⁵⁵ Political Finance Online - Electoral Commission, 2025

¹⁵⁶ Preparing and filing Companies House accounts - Companies House, 2025

¹⁵⁷ The 95% confidence interval indicates that if the analysis is conducted 100 times using new samples, 95 of those would contain the true value.

used¹⁵⁸. All companies are required to record their PSCs on the register¹⁵⁹. Data on donors from the Electoral Commission was matched to the PSC register using the company registration number. The data on the PSC register at the time the donation was made was used to assess the compliance of the companies with the PSC test. Having a recorded British nationality was used as a proxy for being on the electoral register, as it was not possible to confirm whether individual PSCs were on the electoral register. In cases where a company was owned by a trust, it was not possible with the available data to differentiate between trustees and trust owners. Therefore, this has not been considered in the analysis. Companies that didn't publish their PSC data were assumed not to meet the PSC test.

345. **An appraisal was conducted on the exemption from the new company donation rules, which applies to in-kind donations amounting to less than £2,230 over the year-long period prior to the donation date.** This uses the sample of Electoral Commission donation data to identify in-kind donations made by a single donor company to a single recipient. Donations of this type and amounting to a cumulative sum of less than £2,230 when added to any previous in-kind donations from that donor over the year prior to the 2024 UKPGE, were calculated as a proportion of all donations in the sample, and were counted as exempt from the new rules on company donations.
346. The following mapping was used to estimate if the type of donation would have been in scope of the exemption from the new rules (subject to not exceeding the £2,230 threshold):
- i. Donation types in scope of exemption
 - a) Visit
 - b) Non-Cash (Staff costs, Hospitality, Consultancy services, Premises, Administration services, Travel, Advertising, Sponsorship)
 - ii. Donation types not in scope of exemption
 - a) Cash
 - b) Non-Cash (Auction prizes, Other)
347. **An overall estimate of the proportion of individual donations during the period that were either compliant with or exempt from the new company donation rules was estimated** by combining the compliance with the profit test (based on data for large and medium companies only) and the PSC test (based on data for all companies) along with the proportion of donations that were exempt from the rules.

Impact on sum total value of donations

¹⁵⁸ [People with significant control \(PSC\) snapshot - Companies House, 2025](#)

¹⁵⁹ [People with significant control \(PSCs\) - Companies House, 2025](#)

348. **Due to the non-availability of profit and loss data for small companies, a definitive assessment of exactly which donations would have been compliant with the profit test was only possible for donations made by large and medium companies, which represented 70% of the total value of donations made during the sample period.** For the remaining 30% of total donation value, corresponding to donations made by small companies, Monte Carlo analysis was used to estimate the possible range of donation value that would be compliant. To do this, the data was sampled repeatedly using the estimated compliance of individual donations (which was based on the profit test compliance rate for medium and large companies). Then, the sum total value of compliant donations was calculated for each round of sampling. To obtain an estimate of the value of donations made by small companies that would be compliant with the profit test, the range within which 95% of the sample outcomes fell was found.
349. To produce an overall estimate of the total value of donations made by small, medium and large companies that would be compliant with the profit test, the Monte Carlo-based estimates (for small company donations) were combined with the direct estimates (for medium and large company donations).
350. **It should be noted that since the direct analysis on profit after tax is based on large and medium companies only,** it is assumed that the compliance with the profit test is the same for small companies and micro entities (which generally do not include profit and loss statements in their accounts). It is possible that their compliance with this test could differ from the compliance of medium and large companies, which would affect the outcome of appraisal. Sensitivity analysis of this assumption is conducted in section H.2.3.

F.8.2 Monetised impacts

351. There are no monetisable costs or benefits, either direct or indirect, resulting from this policy.

F.8.2 Non-monetised impacts

F.8.3.1 Direct costs

352. **It is possible that individuals and organisations may be discouraged from financially supporting political parties or candidates, which could narrow the spectrum of financial support across the political landscape.** This, in turn, may reduce the diversity of voices and viewpoints in democratic debate. On the other hand, if the policy drives more disclosure than anticipated, it could place excessive amounts of administrative pressure on the political parties and regulators.

353. In the year prior to the 2024 UKPGE, £42.6m in donations were accepted by political parties and other regulated donees from companies and Limited Liability Partnerships¹⁶⁰. This represents 31% of the total value of political donations made during the period.
354. Based on analysis of the data collected by the Electoral Commission on donations made by companies and Limited Liability Partnerships in the year prior to the 2024 UKPGE and data held by Companies House, Table 9 shows the estimated proportion of individual donations and total donation value that would have been permissible under the new requirements during this period. As covered in section F.7.1, which explains the methodology in more detail, elements of these estimates are based on data from large and medium companies only, and may not take account of any differences in the nature of companies and/or donations by smaller companies.

Table 9: Estimated permissibility of company donations made in the year prior to 2024 UKPGE under the new regulations

Test	% of all individual company donations	% of total value of company donations
Compliant with profit after tax test only	90.0% - 94.3%	93.8% - 98.4%
Compliant with HQ and PSC tests only	72.5%	73.3%
Exempt from new rules	3.0%	0.1%
Permissible under new company donations rules (compliant with tests <u>or</u> exempt from rules)	66.2% - 69.4%	67.6% - 73.9%

355. **Attainers will be prohibited from making political donations.** The introduction of Votes at 16 means the age of attainers in UK-wide and English elections will be 14 and 15 and their registration data must come with enhanced protection. However, there will be no way of verifying that 14- and 15-year-old attainers are on the register, and are therefore permissible donors, given their data may only be disclosed in specific and limited circumstances, for example, in order to run elections. These changes will be made across the UK in reserved and devolved polls and will only impact existing attainers in Scotland and Wales.
356. **Enhanced checks on donations from overseas electors, under Know-Your-Donor (KYD), and increased and new checks for unincorporated associations (UAs) may result in additional administrative actions for those making or receiving larger donations.** It is expected that some of the new checks

¹⁶⁰ [Political Finance Online - Electoral Commission, 2025](#)

being introduced may be undertaken voluntarily by political parties or UAs already. Candidates and MPs will be less affected as they typically receive smaller donations which fall under the KYD threshold. Ultimately these reforms will aid UAs and recipients to identify illegitimate donations, and support them to comply with the rules.

357. **Overseas electors will be limited to donating a maximum of £100k per year, and for declaring to recipients they have not exceeded that cap.** We are unable to estimate how many donations, or the value of donations this will impact as we do not have that data, but we estimate the number of donors whose cumulative donations exceeded £100k between 2015 and 2025 was on average 57 per year.

F.8.3.2 Indirect costs

358. There are no non-monetisable indirect costs resulting from this policy.

F.8.3.3 Direct benefits

359. **Enhancing existing controls on donors and recipients of political donations would directly address vulnerabilities in the current system and significantly reduce the risk of foreign interference in UK democratic processes** whilst ensuring legitimate donors can continue to fund electoral campaigns. This will ensure political parties and other campaigners remain able to raise sufficient funds to communicate their views to the electorate whilst protecting our democracy better against those who seek to covertly undermine it.
360. **Tightening controls on political donors would make it harder for malign actors to obscure the true source of their contributions** by closing loopholes that currently allow foreign or illicit funds to enter the political system through unincorporated associations.
361. **Tightening controls on recipients of donations would address concerns that the permissibility checks which recipients are required to carry out on donors are insufficiently robust**, and would bring them into closer alignment with the more stringent anti-money laundering and know-your-customer obligations in corporate and charity sectors. Moreover, statutory due diligence guidance will ensure that all parties are carrying equally robust checks against foreign and criminal money

F.8.3.4 Indirect benefits

362. **The enhanced transparency and accountability from tightening controls on both donors and recipients of donations would help to safeguard the integrity of elections** and in turn restore public trust in political financing.

F.9 The Electoral Commission and Enforcement

F.9.1 Methodology

363. **An assessment of all potential monetised and non-monetised impacts resulting from the policy has been undertaken.** The EC has identified monetised costs it expects to incur as a result of the proposed changes. Unlike the approach taken for other policy measures in this Impact Assessment, this cost estimate includes costs related to staffing. This reflects the fact that the Commission will take on new and expanded responsibilities as a direct result of the proposed reforms. The staffing costs are therefore a direct impact of the policy itself, rather than being associated with transitional or implementation support. This approach ensures the appraisal captures the full operational implications of the enforcement provisions.
364. The appraisal of the Electoral Commission and enforcement policy also relies on a qualitative assessment of non-monetised impacts, where the assessment is proportionate to the scale and significance of the relevant policy.

F.9.2 Monetised impacts

F.9.2.1 Direct costs

365. **The Electoral Commission has provided an estimate for costs related to regulatory reform activities outlined in the bill.** Due to the integrated nature of the reforms, it has not been possible to disaggregate costs by individual measure. Hence, this figure has been attributed to the enforcement measures within this Impact Assessment for the purposes of presenting a consolidated view of anticipated expenditure. Accordingly, this estimate should be regarded as indicative and subject to a degree of uncertainty.
366. **Detailed planning of the work required will be undertaken in parallel with the implementation of the policy.** Cost estimates are therefore indicative and based on the EC's current understanding of the proposed changes, as well as learning from the implementation of other major changes in the democratic process.
367. **Electoral Commission costs are estimated between £6.7 million and £20.0 million, with a central estimate of £13.3 million (2025/26 prices, 10-year PV).**

F.9.2.2 Indirect costs

368. There are no monetisable indirect costs resulting from this policy.

F.9.2.3 Direct benefits

369. There are no monetisable direct benefits resulting from this policy.

F.9.2.4 Indirect benefits

370. There are no monetisable indirect benefits resulting from this policy.

F.9.2.5 Summary – BNPV, NPSV, EANDCB

371. Under the central scenario, the estimated total quantified benefits and costs are £0 and £13.3 million, respectively, which provides a **NPSV for the Electoral Commission and Enforcement under Option 1 of around -£13.3 million (2025/26 prices) over the 10-year appraisal period.**

Table 10: Summary of monetised impacts for the Electoral Commission and Enforcement (£m, 2025/26 - 2034/35)

Impact	Scenario		
	Low	Central	High
Benefits			
Total benefits	-	-	-
Costs			
Electoral Commission	6.7	13.3	20.0
Total costs	6.7	13.3	20.0
NPSV	-6.7	-13.3	-20.0

Figures may not sum due to rounding

372. To account uncertainty, analysis has been conducted to estimate the upper and lower bound of these estimates. **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 £6.7 million and £0, respectively, resulting in **an estimated NPSV of -£6.7 million (2025/26 prices, 10-year PV).**
 - Under the high scenario, the estimated quantified total costs and benefits are £20.0 million and £0, respectively, leading to **an estimated NPSV of -£20.0 million (2025/26 prices, 10-year PV).**
373. **The BNPV and EANDCB is expected to be £0** as there are no monetisable impacts on business as a result of this legislation being introduced.

F.9.3 Non-monetised impacts

F.9.3.1 Direct costs

374. There are no non-monetisable direct costs resulting from this policy.

F.9.3.2 Indirect costs

375. There are no non-monetisable indirect costs resulting from this policy.

F.9.3.3 Direct benefits

376. Reforms to the role and powers of the EC will mean that breaches of the political finance framework committed by candidates and local third-party campaigners can be investigated by the EC. **Providing an alternative to criminal prosecution, which is often considered to be disproportionate to the offence and not in the public interest, will help to close the ‘enforcement gap’** where breaches of the rules are currently left unaddressed and unsanctioned.
377. **Raising the EC’s maximum fine would strike a balance between ensuring effective deterrence for parties and campaigners across the political spectrum whilst protecting smaller parties with fewer resources from disproportionate sanctions**, by ensuring that penalties are proportionate to the scale of campaign spending and discouraging larger parties from treating fines as a routine cost.
378. **Establishing a broad reciprocal statutory mechanism enabling the EC to lawfully disclose information to, and receive information from, other regulators, enforcement agencies and relevant public authorities for the purpose of assisting the receiving body in carrying out its functions** would reduce unnecessary complexity and bureaucracy, improve cross-regulatory coordination, streamline enforcement, and strengthen the overall effectiveness and efficiency of electoral oversight.
379. Extending the EC’s powers to require disclosure outside of an investigation will enable the EC to effectively perform its statutory functions, allowing it to **(a) gather information in close to real-time during elections campaigns to support the resolution of issues outside of a formal investigation where that is appropriate and (b) to more effectively gather information as to whether there are grounds to suspect an offence/breach has been committed so that – when appropriate – an investigation can be opened in a more timely manner**. This will make regulation and enforcement more responsive and proportionate.
380. Transferring responsibility for granting permission to parties, candidates and campaigners to pay late invoices from suppliers to the EC, rather than the courts who have current responsibility **will lead to a reduction in administrative burdens on parties and campaigners as well as on the court system**.
381. **Providing the Electoral Commission with powers to prescribe standardised reporting formats for campaign spending returns will improve the consistency, accessibility and comparability of campaign finance information**. This should reduce variation in reporting, making expenditure data easier to analyse and scrutinise, reducing administrative burden on the EC, and supporting greater transparency.

F.9.3.4 Indirect benefits

382. **Reclassifying minor administrative breaches, such as late submission of statutory reports, would encourage broader participation in campaigning** by reducing the threat of criminal investigation and prosecution, without compromising compliance as these offences will be punishable for the most part through civil sanctions.
383. **Raising the EC's maximum fine could lead to an increase in fine income.** However, 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. 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.
384. **Reforms to the role and powers of the EC are also necessary to maximise the impact of the changes made to the political finance framework** outlined above by strengthening enforcement of the framework.

F.10 Imprints

F.10.1 Methodology

385. **An assessment of all potential monetised and non-monetised impacts resulting from the policy has been undertaken. No monetised costs or benefits were identified.** As such, the appraisal of the outcomes of the imprints policies relies on a qualitative assessment of non-monetised impacts, where the assessment is proportionate to the scale and significance of the relevant policy.

F.10.2 Monetised impacts

386. There are no monetisable costs or benefits, either direct or indirect, resulting from this policy.

F.10.3 Non-monetised impacts

F.10.3.1 Direct costs

387. **Third party campaigners who are not recognised may incur a small, likely one-off cost when creating a digital imprint for organic digital campaigning material.** This cost is expected to be minimal as the imprint, typically a short text including the promoter's details can be reused across multiple platforms and adapted from existing print materials. Given the negligible nature of this cost and the absence of reliable data, it has not been monetised, as doing so would not be proportionate to the expected impact.
388. **Campaigners may incur a small familiarisation cost when new reporting formats are introduced,** including reviewing updated guidance and adapting

internal processes. Such costs are expected to be limited and offset over time by clearer and more consistent reporting requirements.

389.

F.10.3.2 Indirect costs

390. 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. **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 limited evidence to make an assessment regarding how much it costs to remove content from digital platforms.

F.10.3.3 Direct benefits

391. **The primary benefit of the new digital imprints regime is to provide increased transparency for voters with regards to digital campaigning material.** The EC's report on the 2024 UKPGE¹⁶¹ 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.
392. **By ensuring that all campaign material can be clearly attributed regardless of the medium of communication, voters are better equipped to assess the origin and intent of the messages they encounter.** This change promotes informed decision-making and enhances the integrity of the electoral process, without placing undue burdens on individuals simply sharing personal political views.
393. **Extending the digital imprint requirements would deliver on recommendations by the EC and Fair Vote UK to close the loophole that creates a transparency gap relating to organic material.** There is also precedent to do so, as the Scottish Elections (Representation and Reform) Act 2025 recently enacted rules broadly equivalent to the UK digital imprint rules, by requiring digital imprints on organic material promoted by third party campaigning organisations who are not recognised relating to devolved Scottish elections.

¹⁶¹ 2024 UK Parliamentary general election and the May 2024 elections - Electoral Commission, 2024: Evaluation of Electoral Integrity Programme: public opinion research wave 3 – MHCLG, 2025

394. **Removal of the requirement for Secretary of State approval and the 40-day parliamentary procedure where the EC is making minor corrections to digital imprint guidance, will enable the EC to update its guidance more responsively** for example, in response to platform name changes.
395. Streamlining the enforcement of the imprint regime, so that the EC will take responsibility for enforcing all imprint offences in the first instance. **This will bring greater clarity, consistency and proportionality to enforcement.**

F.10.3.4 Indirect benefits

396. **Streamlining enforcement of the imprint regime by assigning initial responsibility solely to the EC is likely to foster a more inclusive and accessible democratic environment.** By reducing the threat of criminal investigation for minor infractions and clarifying enforcement responsibilities, the reform reduces legal uncertainty and perceived risk for campaigners. This is especially important for volunteers and first-time candidates, who may otherwise be discouraged from participating due to fear of disproportionate penalties. In turn, this can lead to broader civic engagement and a more representative political landscape.

F.11 Northern Ireland Measures

F.11.1 Methodology

397. **An assessment of all potential monetised and non-monetised impacts resulting from each sub-policy has been undertaken. No monetised costs or benefits were identified.** As such, the appraisal of the Northern Ireland measures relies on a qualitative assessment of non-monetised impacts, where the assessment is proportionate to the scale and significance of the relevant policy.

F.11.2 Monetised impacts

398. There are no monetisable costs or benefits, either direct or indirect, resulting from this policy.

F.11.3 Non-monetised impacts

F.11.3.1 Direct costs

399. Changing the Northern Ireland canvass to an annual process will create some new costs for the Electoral Office for Northern Ireland as they will need to canvass Northern Ireland households every year rather than every 10 years as is currently the case. However, removing the need to create a new electoral register from scratch every ten years will also remove a major burden and resource cost. The details of a new canvass regime will be set out in secondary legislation and as such

precise costs are not currently available. It is intended that the new canvass will be more targeted in its approach than the current system and therefore less resource intensive. Potential related changes, such as amending the circumstances in which paper based communications are required, may also reduce costs on the CEO. **The CEO expects that changes to the current model will be cost neutral in the long term, but will allow for a more efficient canvass process and improve the accuracy of the Northern Ireland electoral register.**

400. **The removal of the date of birth from the Northern Ireland electoral ID card may reduce its perceived utility beyond voting.** While this change could lead to lower uptake of the electoral card, it is not expected to suppress elector turnout. The card will remain fully valid for its intended purpose of voting. Therefore, while it is likely that uptake of electoral ID cards will reduce, this should not translate into reduced electoral participation.

F.11.3.2 Indirect costs

401. There are no expected indirect costs relating to this policy. This is because these changes are primarily technical changes aimed at improving the efficiency and accuracy of electoral processes in Northern Ireland.

F.11.3.3 Direct benefits

402. **A small cost saving may be made by the CEO in relation to the electoral ID measures, due to a reduction in applications.** However, these are expected to be minimal and will be absorbed by the EONI for other purposes so have not been quantified. The canvass reforms are also expected to reduce overall costs to EONI but it is not possible to quantify these at this stage of the policy development.
403. **Moving to a rolling system of registration drastically reduce the risk of arbitrary removal of voters from the electoral register.** This modernised approach, aligned with the lighter-touch process used in GB, will allow the CEO to use available data to maintain the register more accurately and flexibly. It supports electoral integrity by reducing the risk of disenfranchisement, especially ahead of changes like Votes at 16, and is backed by both the CEO and the EC.
404. **Amending Northern Ireland's late-registration requirements will remove an outdated legal barrier that unnecessarily forces all late applicants to provide extra documentation.** The change will make registration more accessible, especially for younger voters who often lack multiple forms of documentation, thereby improving inclusivity and modernising the registration process.
405. The legal requirement for poll clerks in Northern Ireland to call out voters' names and numbers is an intimidatory practice for voters which can deter participation and compromise voter privacy. **Removing the legal requirement will enhance the**

voting experience by making it more discreet and comfortable for electors, while still maintaining transparency and accountability through other established safeguards.

F.11.3.4 Indirect benefits

406. **Moving to a rolling system of registration will allow for the maximum flexibility to incorporate some of the wider developments to ‘improve registration’** that will follow in the Votes at 16 secondary legislation programme, as well as future advances in data sharing.
407. **Adding NINOs to elector records will improve registration by reducing the burden on applicants** through helping ensure electoral records are complete without the applicant needing to seek new or additional information. The change will also support the implementation of Votes at 16 for attainers.

F.12 Summary of Option

408. The estimated total quantified benefits and costs are £0 million and £107.2 million respectively under the central assumptions, which provides a **NPSV for the bill under the preferred option of around -£107.2 million (2025/26 prices) over the 10-year appraisal period.**

Table 11: Summary of monetised impacts of the Bill under Option 1 (£m, 2025/26 - 2034/35)

Impact	Scenario		
	Low	Central	High
Benefits			
Absent Voting	13.4	26.8	40.2
Total benefits	13.4	26.8	40.2
Costs			
Votes at 16	44.0	88.1	132.1
Improving Registration	2.6	5.2	7.8
Voter ID	0.3	0.6	0.9
Candidate ID and Nominations Changes	-	-	-
Outcomes of the Elections Review	0.1	0.1	0.2
Absent Voting	2.7	5.4	8.1
Harassment and Intimidation	-	-	-
Political Finance	-	-	-
The EC and Enforcement	6.7	13.3	20.0
Imprints	-	-	-
Northern Ireland Measures	-	-	-
Total costs	56.3	112.7	169.0
NPSV	-43.0	-85.9	-128.9

Figures may not sum due to rounding

409. **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 £56.3 million and £13.4 million respectively, thus giving an estimated NPSV of -£43.0 million (2025/26 prices, 10-year PV). Under the high scenario, the estimated costs and benefits are £169.0 million and £40.2 million respectively, thus resulting in an estimated NPSV of -£128.9 million (2025/26 prices, 10-year PV).
410. **The Business Net Present Value and the Equivalent Annual Net Direct Cost to Business is estimated to be £0** (2025/26 prices, 10-year PV) as there are no monetisable impacts on business as a result of this legislation being introduced.

G. Direct costs and benefits to business calculations

411. As described in more detail in section F, **there are no direct costs or benefits to business** as a result of the proposed policies.

H. Risks and assumptions

H.1 Risks

412. **This section outlines the analytical risks associated with the Bill, and it also provides sensitivity analysis to test the assumptions outlined in the central scenario.** The key analytical risks associated with this Bill include the uncertainty regarding the proportion of 16- and 17-year-olds that choose to register to vote, and the impact of improved voter registration policies on overall register completeness.
413. **A key component of the analysis is elector behaviour, particularly in response to the introduction of Votes at 16 and Improving Registration policies.** However, such behaviour is difficult to predict. Further evidence gathering will take place to refine these assumptions as the policy develops. To account for this uncertainty, a sensitivity analysis has been conducted to demonstrate the impact elector behaviour can have on model outputs by varying the registration rate assumption. This can be seen below in section H.2.
414. **The cost modelling of electoral policies is inherently uncertain due to the timing of UKPGEs.** The current modelling assumes that the next UKPGE will take place during the Spending Review period (May 2028). There is a risk it could be called earlier or later, which would significantly impact cost profiling. This risk cannot be mitigated, as a UKPGE may be called at any time. This does not reflect any plans on when future elections will take place.
415. **The sub-sections below set out the key analytical risks for each policy for which monetised impacts have been modelled and included in this IA.** The

analysis does not include monetised impacts for candidate ID and nominations changes, outcomes of the elections review, harassment and intimidation, political finance, the Electoral Commission and enforcement, imprints, or measures specific to Northern Ireland. The primary limitation in assessing these policies is the unavailability of this data. To address this, qualitative analysis has been undertaken to better understand the potential effects of the changes. However, this approach carries the risk that the full monetised costs and benefits may not be reflected in the NPSV, potentially leading to an incomplete picture of the overall impact.

H.1.1 Votes at 16

416. **The central risk for this policy is the uncertainty around uptake among newly enfranchised 16- and 17-year-olds.** The expected level of engagement is difficult to predict, and if actual uptake is lower than anticipated, this could result in overestimated costs. Conversely, if the policy is more effective than expected, it could place greater demands on administrative systems, EROs and resources.

H.1.2 Improving Registration

417. **The key risk associated with this policy is the uncertainty about its effectiveness in increasing register completeness and accuracy.** Outcomes depend heavily on the extent to which unregistered, or incorrectly registered, individuals can be identified and engage with the registration process. If the policy has limited impact, then its benefits may fall short of expectations. Conversely, if the policy is more effective than expected, it could place greater demands on administrative systems, EROs and resources.
418. **Streamlining voter registration to make the process easier, will significantly rely on the robustness of any integration of government services or new systems put in place to assist individuals to register, update their details or verify their identity.** It is also likely to depend on gaining access to reliable and up-to-date data, which meet the requirements of both electoral administrators and the law. If for instance, EROs are not satisfied that the new systems or data meet legal requirements they may not be able to safely add individuals to the register or update their details. Electors could similarly be deterred, if they do not trust the new processes.
419. **It is essential that any new approaches to voter registration improve the process and do not risk creating barriers or confusion.** Changes to registration policy will need to be clearly communicated and have the support and understanding of all parties, to maintain confidence in the registration process.

H.1.3 Voter ID

420. **An analytical risk associated with the introduction of bank cards, but limiting it to in-date UK-authorised cards, as an additional form of Voter ID is in the assumption that any increase in the number of in-person voters as a result of the policy change will be marginal**, such that they can be accommodated by the normal provisions of polling stations and polling station staff.

H.1.5 Absent Voting

421. **One of the main analytical risks for the absent voting policy is that several key modelling assumptions are based on data collected under the three-year maximum term.** These include assumptions such as the proportion of expiring postal voters who reapply and the proportion of reapplication reminders sent by paper. The assumptions are informed by survey data collected by the AEA, which achieved a response rate of approximately 50% of Local Authorities in Great Britain. This poses several potential risks for the modelling:
- i. The data provided may not accurately reflect what the values would be for LAs who did not respond to the survey.
 - ii. The data covers the period when electors were required to reapply for the first time. They may behave differently when asked to reapply in future years due to greater familiarity with the process.
 - iii. The assumptions don't account for any potential changes in elector behaviour with moving to a five-year maximum term.
422. **As future elector behaviour is uncertain, the modelling assumes that the level of registered postal voters will remain broadly consistent.** If this is not the case, and the longer registration leads to a persistently higher number of registered postal voters then the benefits associated with this policy could be reduced, due to increased costs of the postal voting system with an increased number of postal voters in the five-year scenario.
423. **Since the number of applications for those not registered as postal voters is set to ensure that the stock of postal voters remains consistent over time it may not accurately reflect the profile of demand for postal votes.** While it would be expected the stock of postal voters remains consistent, the way that it is modelled may not accurately reflect the exact stock of postal voters in each year. However it is expected that the scope of the costs and benefits is broadly accurate.

H.1.5 Political Finance

424. **The main analytical risk around the analysis of the political finance measures on company donations is around the assumption that the compliance with the profit test for small and micro businesses is the same as for medium and large businesses.** Without any further evidence being available, this is a reasonable assumption. But if the compliance of small and micro businesses is significantly different than this, then the overall estimate of compliance could be

more or less than has been estimated. Sensitivity analysis of this case is conducted in section H.2.3.

425. **The analysis only covers donation data from one period in time (the year prior to the 2024 UKPGE), and as a consequence the characteristics of the type of companies that make donations in future may not be the same as in the period analysed.** Therefore, the impact on company donations of the measures once they come into effect could differ from the estimates.
426. **There could be cases in which a business is impermissible on the basis of having a parent company.** If this parent company is a permissible donor, then it could instead choose to make the donation instead of the subsidiary company. If this is the case for some of the companies included in the sample, then the impact on company donations of the measures could be smaller than estimated.

H.2 Sensitivity analysis

427. **The estimates outlined above are based on assumptions which are uncertain, and therefore any changes in these assumptions may have a substantial impact on the overall outputs.** As per Green Book guidance, sensitivity analysis has been carried out to test the assumptions underpinning Option 1 for both Votes at 16 and Improving Registration. These are the policies for which comprehensive cost modelling has been developed.
428. **This sensitivity analysis will provide a low and high-cost scenario for the 10-year NPV.** This has been done by adjusting the values which carry the most uncertainty, which are associated with elector behaviour and have the highest impact on costs. Elector behaviour is difficult to predict and there is limited evidence as to how electors' behaviour will be impacted by the implementation of the policy changes.

H.2.1 Low-cost scenario

429. **Votes at 16** – Under the low-cost scenario, it is assumed that the completeness of the electoral register for 16- and 17-year-olds will reach 60%, a decrease of 28.9 percentage points relative to the central scenario assumption of 88.9%.
430. **Improving registration** – Under the low-cost scenario, it is assumed that the completeness of the register will see a negligible change by the end of the 10-year appraisal period, remaining at the baseline completeness rate (86% in GB, 83% in Northern Ireland).
431. **Absent Voting** – Under the low-cost scenario, it is assumed that the proportion of expiring postal voters that choose to reapply is equal to 52.2%, a decrease of 15 percentage points relative to the central scenario assumption of 67.2%.

432. Further details of the low-cost scenario are outlined below.

H.2.2 High-cost scenario

433. **Votes at 16** – Under the high-cost scenario, it is assumed that the completeness of the electoral register for 16- and 17-year-olds will reach 91.9%, an increase of 3 percentage points relative to the central scenario assumption of 88.9%.

434. **Improving registration** – Under the high-cost scenario, it is assumed that the completeness of the register will see an increase of 6 percentage points by the end of the 10-year appraisal period, relative to the baseline completeness rate (86% in GB, 83% in Northern Ireland). This results in an overall completeness rate of 91.9% across UK electoral registers, representing an increase of 3 percentage points relative to the central scenario assumption of 88.9%.

435. **Absent Voting** – Under the high-cost scenario, it is assumed that the proportion of expiring postal voters that choose to reapply is equal to 52.2%, an increase of 15 percentage points relative to the central scenario assumption of 82.2%

436. Further details of the high-cost scenario are outlined below.

Table 12: Summary of sensitivity analysis for Option 1 (£m, 2025/26-2034/35)

Impact	Scenario		
	Low	Central	High
Benefits			
Absent Voting	30.1	26.8	22.8
Total benefits	30.1	26.8	22.8
Costs			
Votes at 16	74.3	88.1	89.5
Improving Registration	0.5	5.2	9.9
Absent Voting	4.8	5.4	4.9
Total costs	79.6	98.7	104.3
NPSV	-49.5	-71.9	81.6

437. **The total NPSV for the low-cost scenario is -£49.5 million, representing a 31.2% decrease when compared to the central scenario.** The total benefits modelled in the low-cost scenario is £30.1m, representing a 12.4% increase when compared to the central scenario. The total cost modelled in the low-cost scenario 1 is £79.6m, representing a 19.4% decrease when compared to the total cost of the central scenario. An explanation of the cost changes for each policy in the low-cost scenario can be found below.

- **Votes at 16** - In the low-cost scenario, the total cost of Votes at 16 falls by £13.7m from the central scenario, representing a decrease of 15.6%. This is because register completeness impacts all registration and conduct costs

except for training. In the low scenario it is assumed that register completeness will match what it currently is for 18- and 19-year-olds¹⁶². This is significantly lower than the central scenario and represents a high level of uncertainty in the expected uptake of the policy. This leads to the large difference in costs between the central and low scenarios. This highlights the risk of these costs being an overestimate if demand is less than modelled.

- **Improving Registration** - In the low-cost scenario, the total cost of Improving Registration falls by £4.7 million from the central scenario, representing a decrease of 90.9%. This is because we assume in this scenario that the policy will have little to no impact, resulting in no change to the completeness by the end of the 10-year appraisal period. In contrast, in the central scenario, we assume that the completeness of registers will increase by 3 percentage points (from 85.9% to 88.9%) by the end of the 10-year appraisal period.
- **Absent Voting** - In the low-cost scenario, the NPSV of Absent Voting increases by £4.0 million, representing an increase of 18.6%. The costs of the policy fall by £0.6 million, representing a decrease of 11.9%. This is due to a greater difference in the number registered postal voters between the three- and five-year scenarios, this is driven by a reduction of registered postal voters in the five-year scenario compared to the expected trend. The benefits of the policy rise by £3.3 million, representing an increase of 12.4%. This is driven by increased number of cancellations and applications from elector not registered as postal voters in the three-year scenario compared to the five-year scenario, meaning a greater difference in costs between the two scenarios.

438. **The total NPSV for the high-cost scenario is -£81.6 million, representing a 13.5% increase when compared to the central scenario.** The total benefits modelled in the high-cost scenario is £22.7m, representing a 15.3% decrease when compared to the central scenario. The total cost modelled in the high-cost scenario is £104.3m, representing a 5.7% increase when compared to the total cost of the central scenario. An explanation of the cost changes for each policy in the high-cost scenario can be found below.

- **Votes at 16** - In the high-cost scenario, the total cost of Votes at 16 increases by £1.4m from the central scenario, representing an increase of 1.6%. This is because we assume in this scenario that the register completeness for 16- and 17-year-olds will rise to 91.9% during the 10-year appraisal period, in line with the overall register completeness achieved in the high scenario of the improving registration policy. As the difference in completeness relative to the central scenario is less compared to the low scenario, the difference in costs between the high and central scenario is relatively low.

¹⁶² [Electoral registers in the UK - Electoral Commission, 2023](#)

- **Improving registration** - In the high-cost scenario, the total cost of Improving Registration increases by £4.7 million from the central scenario, representing an increase of 90.9%. This is because we assume in this scenario that the overall completeness of UK registers will increase by 6 percentage points (from 85.9% to 91.9%) by the end of the 10-year appraisal period. The value of the completeness rate in the high-cost scenario is in line with the overall completeness of Australia's electoral registers (as at 30th June 2024), as described in section F.2.1. In contrast, in the central scenario, we assume that the completeness of registers will increase by 3 percentage points (from 85.9% to 88.9%) by the end of the 10-year appraisal period.
- **Absent Voting** - In the high-cost scenario, the NPSV of Absent Voting decreases by £3.6 million, representing a decrease of 16.6%. The costs of the policy fall by £0.5 million, representing a decrease of 10.0%. This is due to a greater difference in the number registered postal voters between the three- and five-year scenarios, this is driven by an increase in registered postal voters in the three-year scenario compared to the expected trend. The benefits of the policy fall by £4.1 million, representing a decrease of 15.3%. This is driven by decreased number of cancellations and applications from elector not registered as postal voters in the three-year scenario compared to the five-year scenario, meaning a smaller difference in costs between the two scenarios.

H.2.3 Political Finance

439. **The key area of uncertainty in evaluating the impact of the political finance measures on company donations is compliance with the profit test for small and micro businesses.** It is currently assumed that the compliance with this test is the same as for medium and large businesses, as it is otherwise unknown due to a lack of profit and loss data.
440. **Sensitivity analysis was undertaken to demonstrate how the estimated impact would change if the above assumption changed.** The analysis was modified to look at the case where compliance with the profit test for small and micro businesses was 15% less than that of medium and larger businesses. It was chosen not to consider a higher scenario, as the compliance with the profit test is already close to 100%. The results of the sensitivity analysis are shown in Table 13.

Table 13: Compliant or exempt individuals donations and donation value in year prior to 2024 UKPGE under new company donations regulations

Scenario	% of individual donations permissible	% of total donation value permissible
Central Scenario	66.2% - 69.4%	67.6% - 73.9%
Lower Scenario	59.0% - 62.1%	65.4% - 72.0%

441. From Table 13, it can be seen that a reduction in compliance with the profit test of 15% for small and micro businesses would lead to an estimated 7.2% reduction in donation compliance and a 1.9% - 2.2% reduction in donation value compliance.

I. Impact on small and micro businesses

442. There are estimated to be no direct impacts on small and micro businesses.

J. Wider impacts

443. The purpose of the Bill is to strengthen the UK's democracy and reinforce the resilience of the electoral system. The proposed changes are 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 a separate full Equality Impact Assessment (EQIA) in accordance with the Public Sector Equality Duty. This section provides an overview of findings.**
444. **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 Votes at 16

445. We conducted an EQIA to show the effect of the main Votes at 16 measures. The key impacts on the relevant protected groups are summarised below:

Age

446. While most 14- and 15-year-olds won't yet have a NINo, which is the standard identity check, mitigations are in place. These include exploring alternative verification methods, such as using education data, as done successfully in Scotland and Wales. Furthermore, upon application, 14- and 15-year-olds will not be asked to provide a NINo, meaning there are reduced barriers to registration.
447. Where data cannot be used to confirm an identity, EROs will request further evidence, using existing processes adapted to younger applicants. Research is underway to identify what forms of ID young people typically hold, and engagement with stakeholders will inform any changes.
448. Regarding data protection for under 16s, their data will not be available on the open register. It will be on the full register, where it will only be disclosed in limited circumstances, for example in order to run elections.

449. We anticipate non-legislative implementation of the policy - such as the role of education and wider democratic engagement in creating an environment in which young people understand their rights and responsibilities – to be a vital tool to support the policy.

Disability

450. Whilst the changes to the franchise in primary legislation will not alter the application process for applicants (with the exception of not requiring a NINo for those under 16), we are conscious that for many of those newly enfranchised this may be their first interaction with a government service. This may make it more challenging for some disabled people to understand or navigate the process.
451. The detail of any new or altered elements of the application process will be developed in secondary legislation. As with any service change across the Bill, we will work closely with LAs, EROs and their representative organisations as we develop our plans. In addition, we will conduct user research and testing (including accessibility testing) to ensure that any changes to the process are user-friendly and inclusive.

Race

452. People from ethnic minority backgrounds are less likely to be registered to vote than the national average^{163, 164}, which has been attributed to a number of factors including the influence of language barriers¹⁶⁵. For this reason, poor communication around the changes to the franchise may risk not reaching newly enfranchised young people.
453. To ensure clarity for varied levels of English language comprehension, changes to the designs of forms and communications as part of the changes – including both paper and online application forms - will include the development of clear messaging. Existing legislation obliges the EC to seek approval from the Secretary of State before making these available to EROs. We believe that this will help to ensure clear and consistent messaging about the franchise change.

Gender Reassignment

454. While transgender individuals may be subject to greater impact at the identity checking stage of an application to register to vote and during the data matching process during the annual canvass due to their NINOs being protected in DWP datasets, this does not prevent registration. Instead, EROs will request alternative evidence, using existing processes already in place for other voters.

¹⁶³ [Registering to vote – Cabinet Office, 2019](#)

¹⁶⁴ [Electoral registers in the UK - Electoral Commission, 2023](#)

¹⁶⁵ [Attitudes to voter registration – Byrne, Duffy, Hollings and Roff, 2023](#)

455. During the annual canvass, the protected status of transgender electors' NINOs in DWP datasets means they are more likely to fail the data matching step. However this does not result in their disenfranchisement - the only impact is that they will receive a more robust canvassing process. For under-16s, NINOs are not required, and other data sources will be used for identity verification, potentially making the process more straightforward than for older applicants.
456. In addition to working with key stakeholders to further reduce barriers to making an application, mitigations such as the attestation process will be available for those who cannot provide other forms of evidence. We do not, therefore, anticipate the lowering of the voting age will have a discriminatory effect against transgender individuals.

J.2 Improving registration

457. We conducted an EQIA to show the effect of the main improving registration measures. The key impacts on the relevant protected groups are summarised below:

Age

458. Research shows that, currently, young people are statistically less likely to be registered to vote. In 2022, 16% of 16–17-year-olds and 60% of 18-19-year-olds were registered to vote versus 96% of those aged 65+ in GB¹⁶⁶. We anticipate that the measures in this Bill to improve voter registration will therefore have a positive impact on the electoral registration rates of young people. Enhanced data-sharing powers could allow EROs to access more accurate and comprehensive datasets, improving their ability to identify unregistered young voters.
459. In parallel, our proposals to simplify and streamline the registration process, through methods such as integrating voter registration with existing online government services and presenting applicants with partly pre-populated registration forms, are expected to reduce administrative friction and increase ease of registration for younger age groups. Lastly, granting EROs the authority to directly register eligible young people without them having to make an application could increase registration rates.

Disability

460. Electoral registration rates for people with disabilities vary depending on type of disability. Research has found¹⁶⁷ registration rates among those with a mental disability to be slightly below the national average for GB but rates for those with a physical disability to be slightly higher. We anticipate that our policies - particularly

¹⁶⁶ [Explore the data: Who is and isn't registered to vote? - Electoral Commission, 2025](#)

¹⁶⁷ [Electoral registers in the UK - Electoral Commission, 2023](#)

direct and assisted registration - could support voter registration among people with mental disabilities by removing administrative complexity from the electoral registration system.

Race

461. In GB, electors from ethnic minority backgrounds are statistically less likely to be registered to vote than the national average (in 2022 this was: Asian – 80%, Black – 72%, Mixed – 72% and other – 71% compared to White - 87%)¹⁶⁶. Proposed policies to improve voter registration - particularly those aimed at simplifying and streamlining the registration process - could help mitigate the barriers currently faced by individuals from some ethnic minority backgrounds and ultimately increase their electoral registration rates.
462. Through the provision of enhanced datasets, EROs will have a strengthened capacity to identify and engage citizens from under-registered populations more effectively. Collectively, these measures should support more equitable access to electoral participation among ethnic minority communities.

J.3 Voter ID

463. We conducted an EQIA to show the effect of the voter ID measures. The change to allow the use of Bank Cards as voter ID will make either universally positive or universally minimal impacts on protected groups. The change has been proposed to improve the accessibility of voting by allowing more ID options for legitimate electors to use, and so reducing the proportion of electors who are unable to meet the requirements. Research on ownership of bank cards among younger voters is still underway, but initial research¹⁶⁸, conducted by Verian on behalf of MHCLG, on the 18+ population suggests that ownership levels are high – 92% have a physical bank card. Levels vary across groups with younger voters being less likely to have a physical bank card (aged 16-34 – 86%, aged 35-54 – 93%, aged 55+ - 95%). However, as the use of bank cards will be an additional option it will be solely a positive impact - for all electors. Indeed, if UK-authorised bank cards were added to the list of accepted IDs, less than 1% would not have ID under the Verian 2025 research. There is therefore no negative equalities impact.

J.4 Candidate ID and Nominations Changes

464. We conducted an EQIA to show the effect of the main candidate ID and nominations changes measures. The key impacts on the relevant protected groups are summarised below:

Age

¹⁶⁸ [Voter identification research - MHCLG, 2025](#)

465. The legislation will require that candidates provide ID when submitting nomination papers. Research on ID ownership among voters has shown that certain demographics, including younger electors are less likely to hold ID (Omnibus survey results from DfE show that 8.4% of 16-19 year olds do not have a form of photographic ID on the prescribed list of accepted ID in Voter ID policy¹⁶⁹ versus 2% from the latest Ipsos public opinion survey results)¹⁷⁰. This policy will have different ID requirements, but it is a reasonable assumption that the same demographics will also be less likely to hold the required documents. Any potential candidate who does not have an accepted form of document to prove their identity will be able to apply for and use a VAC. We therefore believe that any impact will be minimal, and justified to improve the security of the candidate nomination process.

Disability

466. The requirement for candidates to provide ID when submitting nomination papers could negatively impact people with disabilities that prevent them from voting in a polling station (whom research has shown are less likely to hold ID - 11 % don't have photographic ID on the prescribed list of ID and 5% with a disability that effects their daily activities a lot don't have ID versus 2% of the Great Britain adult population)¹⁷³. As previously stated, any potential candidate who does not have an accepted form of document to prove their identity will be able to apply for and use a VAC. We therefore believe that any impact will be minimal, and justified to improve the security of the candidate nomination process.

J.5 Outcomes of the Elections Review

467. We conducted an EQIA to show the effect of the main outcomes of the elections review measures and judged there to be no impacts on any of the protected groups¹⁷¹.

J.6 Absent Voting

468. We conducted an EQIA to show the effect of the main absent voting measures. The key impacts on the relevant protected groups are summarised below:

Age

469. This legislation will make a series of tweaks to the postal voting regime including moving the postal vote application deadline earlier, allowing earlier reissue and cancellation of postal votes, clarifying rules around postal vote determination and delivery and extending the postal vote maximum term to 5 years. Older people are more likely to vote by post, so changes will disproportionately affect those with

¹⁶⁹ Parent, pupil and learner voice: March 2025 - DfE, 2025

¹⁷⁰ Evaluation of Electoral Integrity Mini Wave Tables - Ipsos, 2025

¹⁷¹ The absent voting measures from the review are discussed in the Absent Voting sub-section, alongside absent voting measures that did not originate from the review

protected characteristics. At the 2024 UKPGE, 34% of voters voted by post in GB. Looking at age, 43% of voters aged 65+ opted for this voting method compared with 27% of 18-34-year-olds¹⁷² so changes will disproportionately affect older voters.

470. In isolation, the proposal to move the postal vote application deadline earlier in time could have a negative impact on electors, including older people, by allowing less time overall for them to apply for a postal vote. However, this can be mitigated through effective communications regarding the new deadline. Extending the maximum postal vote term from three years to five years is also likely to reduce the administrative burden on older people who vote by post by requiring them to complete the application process less frequently. Moreover, the proposed changes should have an overall benefit by improving the reliability and flexibility of the postal voting system and facilitating voting where a postal vote does not arrive in time to be used. We therefore believe that overall this is a positive change.

Disability

471. Many of the same considerations apply to people with disabilities. At the 2024 UKPGE, those with a disability were more likely to vote by post (39% for all disabilities, 40% for those with a disability that limits daily activities a lot), and especially those with a disability that prevents them from voting in person (83%) versus 34% of voters overall¹⁷³. Therefore, changes to deadlines and processes may have a disproportionate impact on this group. However, the proposed changes should have an overall benefit, by improving the reliability and flexibility of the postal voting system, reducing the administrative burden associated with postal voting and facilitating voting where their postal vote does not arrive in time to be used. We therefore believe that overall this is a positive change.

J.7 Harassment and Intimidation

472. We conducted an EQIA to show the effect of the main harassment and intimidation measures. The key impacts on the relevant protected groups are summarised below:

Disability

473. The measure giving courts passing sentences for an offence linked to intimidation in an electoral context the power to apply an aggravation may have an indirect positive impact on disabled people. This is because, to the extent that disabled individuals might be disproportionately targeted by intimidation (e.g. via online harassment), this measure could provide indirect positive protection.

¹⁷² [Evaluation of Electoral Integrity Programme: public opinion research wave 3 - MHCLG, 2025](#)

¹⁷³ [Evaluation of Electoral Integrity Programme: public opinion research wave 3 – MHCLG, 2025](#)

474. The measure removing outstanding requirements for candidates' addresses to be published is also likely to have a positive impact on disabled people as candidates with a disability are more likely to experience harassment and intimidation than those without ¹⁷⁴. Therefore, this measure may have a positive impact in protecting them. It may also advance equality of opportunity, by encouraging more disabled candidates to stand for election.

Race

475. Individuals from ethnic minority backgrounds have reported disproportionately high levels of abuse, harassment, and intimidation in election-related roles. This includes both electoral staff and candidates, with racially motivated abuse being a persistent feature of electoral intimidation. Candidates from ethnic minority backgrounds are especially vulnerable, facing threats to personal safety that can deter participation.
476. The policy to extend the remit of the disqualification order to include electoral staff, while drafted as having a neutral impact, may offer meaningful protection to officials from ethnic minority backgrounds by helping to safeguard them from abuse. Similarly, the measure allowing courts to apply an aggravation when sentencing offences linked to electoral intimidation directly addresses the racial dimension of such abuse, reinforcing accountability and deterrence. Finally, removing the requirement for candidates' home addresses to be published is likely to reduce risks for ethnic minority candidates¹⁷⁴, and may encourage greater participation by improving personal safety and privacy.

Sex

477. Evidence shows that women in electoral roles, both as staff and candidates, face significantly higher levels of harassment and intimidation. Recent research conducted by the Electoral Commission¹⁷⁵ found that 56% of women avoided campaigning alone (compared to 19% of men), and 47% avoided discussing controversial topics (compared to 20% of men), highlighting the gendered nature of electoral abuse.
478. The extension of the disqualification order to cover electoral staff, though neutral in drafting, may have a positive impact by offering greater protection to female officials who are more likely to face intimidation. The measure empowering courts to apply an aggravation in sentencing for offences linked to electoral intimidation reinforces protection for women in public life, acknowledging the disproportionate abuse they face. Additionally, removing the requirement to publish candidates'

¹⁷⁴ [2024 UK Parliamentary general election and the May 2024 elections - Electoral Commission, 2024](#)

¹⁷⁵ [Candidate Survey May 2024 Data Tables - Electoral Commission, 2024](#)

home addresses is likely to reduce risks for female candidates and may help encourage more women to stand for election.

Sexual Orientation

479. The measure to give courts passing sentences for an offence linked to intimidation in an electoral context the power to apply an aggravation may have an indirect positive impact on Lesbian, Gay, Bisexual, Transgender, and other (LGBT+) people. This is because it should provide protection to people who are, or who are perceived to be, LGBT+ and are subjected to targeted abuse on this basis.
480. The measure removing outstanding requirements for candidates' addresses to be published is likely to have a positive impact on LGBTQ+ candidates as data¹⁷⁶ suggests that they are more likely to experience harassment and intimidation. Therefore, this measure may have a positive impact on the abuse LGBTQ+ candidates face and may help to diversify the pool of candidates willing to stand.

Gender Reassignment

481. The measure to give courts passing sentences for an offence linked to intimidation in an electoral context the power to apply an aggravation may also have an indirect positive impact on transgender people. This is because it should provide protection to transgender individuals who participate in elections and are subject to targeted abuse.
482. The measure removing outstanding requirements for candidates' addresses to be published is likely to have a positive impact on transgender candidates as data suggests that transgender candidates are more likely to experience harassment and intimidation. Therefore, this measure may have a positive impact on the abuse transgender candidates face and may help to diversify the pool of candidates willing to stand.

J.8 Political Finance

483. We conducted an EQIA to show the effect of the main political finance measures and judged there to be no impacts on any of the protected groups.

J.9 Electoral Commission and Enforcement

484. We conducted an EQIA to show the effect of the main EC and enforcement measures and judged there to be no impacts on any of the protected groups.

J.10 Imprints

485. We conducted an EQIA to show the effect of the main imprints measures and judged there to be no impacts on any of the protected groups.

¹⁷⁶ Intimidation of candidates and voters - Neil Johnston, 2025

J.11 Northern Ireland Measures

486. We conducted an EQIA to show the effect of the main Northern Ireland measures and judged there to be no impacts on any of the protected groups. Other measures contained in the Bill, including on Votes at 16 and Improving Registration, will have an impact on protected groups in Northern Ireland. These impacts are detailed above in the assessments of those measures. It is not expected that the Northern Ireland specific measures will have any impacts on the protected groups assessed here.

K. A summary of the potential trade implications of measure

487. There are unlikely to be any direct trade implications as a result of these measures.

L. Monitoring and evaluation

488. **We are committed to robustly monitoring and evaluating the Bill.** Our approach will build on the department's published Evaluation Strategy. We will publish evaluation findings in a timely manner, consistent with our policy for the publication of research and Government Social Research guidelines.
489. **Monitoring and evaluating the reforms delivered through the Bill will be complex and challenging** for several reasons. The programme is a series of reforms, targeted at different demographic groups and/or aimed at improving different parts of the electoral system. The evaluation approach will need to capture this complexity by assessing impacts from a variety of perspectives, using both qualitative and quantitative methods to understand how and why changes are/are not realised. An additional challenge is that the reforms will be implemented at different times, requiring data collection to be organised around delivery timeframes.
490. **Establishing a counterfactual to assess the impact of reforms and separate out what would have happened irrespective of the legislation will be a key challenge.** This is particularly difficult for assessing longer-term impacts such as turnout, which is affected by many other factors, making attribution a key challenge.

What will we monitor and evaluate?

491. **At this stage, we anticipate that our monitoring and evaluation work will cover the following three broad areas:**
- a) **Impact evaluation that will assess the impacts of the reforms on electors and LAs and others responsible for delivering elections.** This will capture experiences of the measures, focusing on the extent to which the reforms deliver the changes identified in our Theory of change models (see further

detail below). As an example, the types of impacts the evaluation will assess for the Votes at 16 policy may include:

- i. The proportion of young people successfully registered compared to registration for the 18+ population
 - ii. Turnout for young people compared to the 18+ population
 - iii. Young people's trust in elections digital services
 - iv. Young people's engagement in democratic processes
 - v. Young people find the process of registering and casting their first vote easy
- b) **Process evaluation that will seek to examine how the reforms are implemented** and explore:
- How well communications, guidance and support provided to LAs, and others responsible for delivering elections, aid understanding of the reforms and how to successfully implement them
 - How effective communication campaigns aimed at electors are at raising awareness of new measures
 - Any other enablers that help with implementation and how these might be drawn on to share good practices
 - Any barriers or challenges that are faced and how these are overcome
 - Cost implications and how well the reforms are resourced
- c) **Economic evaluation that will be conducted in line with HM Treasury's Green Book guidance to assess whether the benefits of the policies outweigh their costs.** Due to the nature of elections policy outcomes which are difficult to monetise, this may take the form of cost-consequence analysis which compares costs to their associated impacts.

492. **As part of its statutory role in monitoring elections, the EC will also track and report on the implementation of the change made to the Voter ID policy** to allow the use of in-date UK-authorized bank cards as Voter ID in polling stations, including observed impacts on voters.
493. **The monitoring and evaluation of the Northern Ireland specific measures delivered through the Bill is anticipated to primarily focus on the Northern Ireland canvass measure and the NI Electoral ID card measure.** The Electoral Office for Northern Ireland (EONI) will collect quantitative data on these measures. The Northern Ireland Office will work with EONI to evaluate the impact of these reforms. The remaining Northern Ireland specific measures are largely intended to improve process efficiency of the Chief Electoral Officer (CEO) in Northern Ireland. We will continue to regularly engage with the CEO to monitor and evaluate the impact of these changes.

Evaluation preparation

494. **We are taking a phased approach, beginning with a thorough scoping phase to investigate possible evaluation designs and proportionality in approach.** During the scoping phase we will develop a Theory of Change model and research

questions for each measure, which will provide a robust framework for the evaluation. In addition, we have explored options for establishing counterfactuals specific to each policy area and allowing for different aims, target audiences and timings across the Bill.

495. **Next, we will build on this work to produce a full monitoring and evaluation plan that details design, methods, data collection and reporting.** We will work closely with the EC, who will be conducting their own evaluation.

Data collection

496. **A mixed methods approach will be adopted as both qualitative and quantitative data will be needed to assess impacts and understand how they have been delivered.** We anticipate that data collection will include the following:

- **Nationally representative public opinion survey(s) of electors age 18+** to understand electors' experiences and the impact of reforms on electors' awareness, attitudes and behaviour
- **Nationally representative public opinion survey(s) of young people** (aged 14-17) to understand the impact of Votes at 16 on young people's awareness, attitudes and behaviour
- **Qualitative research (e.g. depth interviews and/or focus groups) with target groups of electors** – e.g. young people for votes at 16, under-registered groups for improving voter registration.
- **Case studies with a selection of LAs and others responsible for delivering elections** to explore how the measures are implemented (see process evaluation above).
- **Monitoring data generated by the reforms:** in addition to the primary data collection described above, the evaluation will draw on a wide range of monitoring data. For example, this is likely to include voter registration data generated from the Register to Vote online service, application data for the VAC, and data collected from polling stations on polling day.

Timing

497. **The evaluation will focus on the delivery of the Bill measures at the next UKPGE.** Timings will depend on when the UKPGE is held (currently unknown). However, some measures may be first implemented at an election before the GE and so the evaluation plan will consider whether evaluation at the first local/PCC election to which measures apply would be proportionate in addition to evaluating at the UKPGE. For voter registration, the evaluation will also report on pilots currently expected to begin in 2027.

Annex

A.1. Glossary

Term	Explanation
AE	Anonymous Elector
AEA	Association of Electoral Administrators
BNPV	Business Net Present Value
CEO	Chief Electoral Officer
CPS	Crown Prosecution Service
CSPL	Committee on Standards in Public Life
DCMS	Department for Digital, Culture, Media, and Sport
DfE	Department for Education
EANDCB	Equivalent Annual Net Direct Cost to Business
EC	Electoral Commission
EONI	Electoral Officer for Northern Ireland
ERO	Electoral Registration Officer
EQIA	Equality Impact Assessment
GB	Great Britain
HQ	Headquarters
IA	Impact Assessment
ISC	Intelligence and Security Committee
ITR	Invitations to Register
LA	Local Authority
LGBT+	Lesbian, Gay, Bisexual, Transgender, and others
MHCLG	Ministry of Housing, Communities, and Local Government
MOJ	Ministry of Justice
MRA	Maximum Recoverable Amount
NCA	National Crime Agency
NI	Northern Ireland
NINo	National Insurance number
NPSV	Net Present Social Value
OAVA	Online Absent Vote Application
OPC	Office of the Parliamentary Counsel
PCC	Police and Crime Commissioner
PPERA	Political Parties, Elections and Referendums Act
PSC	Persons with Significant Control
PV	Present Value
RO	Returning Officer
RoMPA	Recall of MPs Act
RPA	Representation of the People Act
SOLACE	Society of Local Authority Chief Executives
SPoC	Spotlight on Corruption
UKPGE	United Kingdom Parliamentary General Election
VAC	Voter Authority Certificate

A.2. Theory of Change: Electoral Timetable

Context / Rationale	Inputs	Activities	Outputs	Outcomes	Impacts
The government's 2024 manifesto committed to strengthen our democracy and uphold the integrity of elections. There are risks brought to the delivery of elections by electoral law which is outdated and does not support Returning Officers and Electoral Registration Officers to do their jobs as effectively as it should, and by supply chains which are fragile and coming under increasing strain. The government has undertaken a strategic review of electoral registration and conduct processes, aiming to reduce the major risks in election delivery and electoral registration; alleviate strain on local authority electoral services; and enhance the voter experience. The current arrangement for nominations is outdated.	Primary legislation allows nominations to be delivered between 9am and 5pm at UK Parliamentary elections, Police and Crime Commissioner and Combined Authority Mayoral elections (Input 1). Primary legislation brings the deadline for nominations from 4pm to midday on the final day of nominations at all reserved elections (Input 2). Primary legislation moves the registration deadline from midnight to 5pm on the 12th working day before the poll (Input 3). Secondary legislation moves the postal vote application deadline earlier in time to 5pm, 14 working days before the poll, from the current deadline of 5pm, 11 working days before the poll, at all reserved polls (Input 4). Target Operating Model and process maps enable quality assurance and	Changes are communicated to candidates, their agents and electors. Local authorities and Valuation Joint Boards are engaged with the changes to the timetable and how they should be implemented in accordance with legislation.	There is a clear and consistent deadline in legislation in line with other statutory deadlines (absent votes and VACs). Electors and candidates are aware of the (new) deadlines. Candidates submit their nominations on time. Electors submit their registration applications ahead of the new deadline. Electors submit their postal vote applications ahead of the new deadline. Input 1 and 2 in combination allow an additional seven hours for the delivery of nominations papers and allow postal ballots to begin production sooner. Ballot paper proofs are approved and postal ballots begin printing on the same	A 5pm deadline allows elections team to deal with any queries on the same day and support any people with issues with their registration application. It will also allow elections teams to finish processing registration applications sooner and send out poll cards to any new applicants. Moving the postal vote application deadline allows more time for the final run of postal votes and will reduce the risk that some electors do not receive their postal vote in time to complete and return it. Moving the nominations deadline from 4pm to midday allows Returning Officers to begin printing postal ballot papers sooner, meaning they can potentially be dispatched sooner giving the electors more time to complete and return them.	Postal vote delivery failure risks are mitigated. Greater resilience is built into elections delivery and registration system.

Postal ballots cannot be printed until after the close of nominations when the list of candidates is confirmed. Presently, electoral administrators and printers work into the night on the nomination deadline date to proof ballot papers ready for printing. ————— There is no clear deadline in legislation for new registrations. ————— The current midnight registration deadline forces elections teams to potentially work late into the night past midnight at a time when they are already strained and where capacity is limited. ————— There is an increasing number of postal votes and pressures on supply chains.	implementation of the process changes (Input 5).		day (as a result of moving nomination deadlines earlier). ————— Nomination deadline change provides more time during the working day to address any queries related to nominations (such as with local authority legal teams).		
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A.3. Theory of Change: Absent Voting (Elections Review Measures)

Context / Rationale	Inputs	Activities	Outputs	Outcomes	Impacts
The government's 2024 manifesto committed to strengthen our democracy and uphold the integrity of elections. ----- There are risks brought to the delivery of elections by electoral law which is outdated and does not support Returning Officers and Electoral Registration Officers to do their jobs as effectively as it should, and by supply chains which are fragile and coming under increasing strain. ----- The government has undertaken a strategic review of electoral registration and conduct processes, aiming to reduce the major risks in election delivery and electoral registration; alleviate strain on local authority electoral services; and enhance the voter experience. ----- Currently, a postal vote that has been lost or not received can only be replaced from the fourth working day before the poll. -----	Secondary legislation allows Returning Officers to issue replacement postal votes from after the postal vote application deadline if they are satisfied that the original postal vote is lost or not received and will not arrive in time for them to cast their vote (Input 1). ----- Primary legislation allows a postal voter to cancel their postal vote and vote in person or appoint an emergency proxy after the postal vote application deadline on the basis that the Electoral Registration Officer is satisfied that their postal vote has not and will not arrive in time for them to cast their vote (Input 2). ----- Primary and secondary legislation establishes a definitive postal vote determination deadline at 5pm on the 6th working day before the poll (Input 3). ----- Primary legislation enables postal votes to be issued during the objections period (Input 4). -----	Local authorities are engaged with the absent voting changes and how they should be implemented in accordance with legislation. ----- Electoral Commission to review guidance on postal vote quality assurance checks. ----- Changes are communicated to electors. ----- Target Operating Model and process maps enable quality assurance and implementation of the process changes.	Electors who need a replacement postal vote get this sooner in the elections cycle, giving them more options if they are away closer to the poll. ----- There are additional options for postal voters where a postal vote is no longer a viable option for them close to polling day.	There is consistency in processes across the country, which help ensure there is enough time for postal vote applications to be processed and the postal votes to be sent out, completed and returned before polling day. Finalisation of absent voter lists and preparation of registers for polling stations are supported in a timely way. ----- Legislation supports the existing good practice that helps people get their postal vote in time before the poll. ----- Inputs 3, 4, 5 and 6 support good practice and remove ambiguity.	Risks to election delivery due to postal voting are reduced. ----- The postal vote system is better prepared if more people opt for a postal vote in future.

Currently, the deadline to apply for a postal vote and to cancel or change a postal vote arrangement are the same, meaning that if there is an issue with postal vote delivery after the deadline, the only option for that voter is to be issued with a replacement postal vote. ----- There is no clear deadline for an elector supplying further supporting evidence for applications, resulting in different practices across the country. ----- Legislation currently sets out rules for the cancellation of postal votes in certain scenarios but does not provide for the cancellation of postal votes in scenarios where an elector is removed from the register.	Primary and secondary (affirmative) legislation clarifies provisions for cancellation of postal votes where an elector is removed from the register (Input 5). ----- Primary and secondary (affirmative) legislation clarifies existing legislation for scenarios where an elector's registration or postal vote arrangement expires during the electoral timetable (Input 6). ----- Consider options for more customised messaging to postal vote applicants (Input 7).				
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