# Title: Voter Identification

IA No:

Lead department or agency: Department for Levelling Up, Housing and Communities (DLUHC)

Other departments or agencies: N/A

# **Impact Assessment (IA)**

**Date**: 24/10/22

Stage: Secondary

Source of intervention: Domestic

Type of measure: Secondary Legislation

Contact for enquiries:

ConstitutionGroupAnalysisMailbox@levellingup.gov.uk

# Summary: Intervention and Options RF

RPC Opinion: N/A

Total Net Present Social	Business Net Present	Net cost to business per	Business Impact Target
Value	Value	year	Status
-£111.8m	£0m	£0m	£0m

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

The 2016 Pickles Report, 'Securing the Ballot: review into electoral fraud,' highlighted the potential for vulnerabilities in the security and integrity of the voting process in polling stations to undermine public confidence in our democratic process. Data recorded by the Electoral Commission finds increasing incidences of alleged electoral fraud over recent years. Perceptions of electoral fraud, also collected by the Electoral Commission, fluctuate over recent years. The Government is seeking to strengthen the integrity of our electoral system and ensure that our elections remain secure, fair, modern and transparent.

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

The policy outcome is to deliver the Government's electoral integrity vision and its commitment to protect our democracy and ensure that it remains fit for the modern age. To ensure that those who are entitled to vote should always be able to exercise that right freely, effectively and in an informed way; and that fraud, intimidation and interference have no place in our democracy. Introducing the requirement for Voter Identification at the polling station should make it significantly more challenging to commit personation and provide the public greater confidence in the electoral system.

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

**Option 0:** Do nothing - the current arrangements for the electoral process will continue and electors will not be required to bring photographic identification in order to cast their ballot.

**Option 1**: This option requires electors to bring an appropriate form of Photographic Identification in order to cast their ballot in suitable elections, local referendums and in recall petitions in Great Britain. Further options were considered at the policy making stage and for primary legislation, which are detailed in the impact assessment published with the Elections Bill (now Act). Voter Identification is now part of the Elections Act 2022 therefore no further options are considered at this stage. This is the **Government's preferred option**.

Is this measure likely to impact on international trade and investment?				
Are any of these organisations in scope?	<b>Micro</b> No	<b>Small</b> No	<b>Medium</b> No	<b>Large</b> No
What is the CO2 equivalent change in greenhouse gas emissions?  (Million tonnes CO2 equivalent)  Traded Non-Traded N/A N/A				
Will the policy be reviewed? It will not be reviewed. If applicable, set review date: 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:

25/10/22

totiene \_ Date:

# **Summary: Analysis & Evidence**

Policy Option 1

**Description:** 

**FULL ECONOMIC ASSESSMENT** 

Price Base Year: PV Base Year:		Time Period	Net Benefit (Present Value (PV)) (£m)	
2022 2	022	Years: 10	Low: -83.9	High: -139.7 Best Estimate: -111.8

COSTS (£m)	Total Transition (Constant Price) 10 Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	£1m	£9.4m	£83.8m
High	£1.7m	£15.6m	£139.7m
Best Estimate	£1.3m	£12.5m	£111.8m

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

- 1. Poll card costs The cost of increasing the poll card size from A5 to A4 in order to display more information, estimated to be £38.9m over the ten-year appraisal period.
- 2. Voter Authority Certificate costs The cost of producing Voter Authority Certificates for people without suitable photographic identification, estimated to be £26.2m over the ten-year appraisal period.

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

- 1. A minority of electors may not complete the voting process evidence from the pilots suggests a small minority of electors may not complete the voting process or may not return to vote after turning up at the polling station without the correct identification.
- 2. Time cost of obtaining a Voter Authority Certificate Whilst Voter Authority Certificates have no monetary cost, there will be a time cost associating for completing an application, especially if electors choose to collect the Certificate in person.

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

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

There are no direct or indirect monetised benefit of Voter Identification.

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

- 1. Increased belief that there are sufficient safeguards to prevent electoral fraud The photographic identification model in the pilot saw substantial increases in the number of people who believed that there were sufficient safeguards to prevent electoral fraud in polling stations.
- 2. Increased satisfaction in the electoral process The 2018 photographic identification pilot in Woking found that satisfaction with the process increased substantially post-election day.

Key assumptions/sensitivities/risks		Discount rate (%)	3.5
1.	<b>Demand for Voter Authority Certificate</b> – The k	ey uncertainty in this analysis is	the estimated demand for
	the Voter Authority Certificate. This is currently b	ased on Electoral Commission of	data representing potential
	need, rather than demand, and the gap between t	he two is currently unknown. For	example, some who don't
	have suitable identification may choose not to app	oly for a Voter Authority Certificat	te and similarly, some who

do have acceptable photographic identification may choose to apply for a Voter Authority Certificate regardless.

**BUSINESS ASSESSMENT (Option 1)** 

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

# **Evidence Base**

# A. Problem under consideration and rationale for intervention

- 1. In its 2019 Manifesto, the government committed to "protect[ing] the integrity of our democracy, by introducing identification to vote at polling stations." Elections are currently undertaken with a high level of success both in terms of the operational delivery and the confidence in the outcome. However, the voting system is currently one based largely on trust, and whilst there is a relatively low level of identified fraud, any level of fraud threatens the system.
- 2. Under the present voting procedure rules, voters at polling stations in England, Scotland and Wales are asked to confirm (i) if they are the person registered at a particular address on the electoral register and (ii) if they have already voted. The law requires poll clerks to call out the name of electors before they are issued with a ballot paper so objections can be made if the person is identified by someone else present as not being who they claim to be. This is no longer consistently done, and people present in a polling station are no longer likely to know everyone else in their local area.
- 3. In 2018¹, the Electoral Commission (EC) reported there were 266 cases of electoral fraud investigated across the UK. Of these, four led to convictions and two individuals were given a police caution. In 2019², the EC reported 595 cases of alleged electoral fraud were investigated by the police, leading to four convictions and two cautions. In 2020, the local, mayoral and PCC elections due to take place in May were postponed due to the Covid-19 pandemic. This led to a lack of substantial polls, meaning the number of allegations reported was particularly low. This means 2020 cannot be meaningfully compared with data from previous years.
- 4. It is impossible to record the levels of fraud that are undetected so public perceptions of fraud, are considered as a proxy. The EC's Winter Tracker³ provides evidence for the perception of fraud in the UK over time. In 2018, the Tracker found 35% of the respondents thought that electoral fraud was a problem 'at the moment'. This fell to 32% in 2019 and rose to 39% in 2020. The Tracker reports that respondents who thought electoral fraud was 'not a problem' was 29%, 27% and 26% in 2018, 2019 and 2020 respectively.
- 5. The perception of electoral fraud being a problem fell sharply in 2021 to 20%, with the level of respondents who thought fraud is not a problem rising to 44%. It is not possible to know the cause of this shift in perception, the EC assesses that "as electoral fraud is something that most people have no direct experience of stories in the media can have a notable effect on perceptions. It could therefore be that the absence of widespread elections and accompanying media coverage in 2020 has contributed to the decline in the level of concern. Another contributory factor could be the reporting of allegations of electoral fraud at the US presidential election as these allegations were widely dismissed in the UK."
- 6. The EC has also found evidence of a reduction in the perception of fraud affecting electoral results. In 2019, 40% of respondents agreed that 'there could be enough electoral fraud in some areas to affect the election result'. This fell to 36% and 22% in 2020 and 2021 respectively.
- 7. To counter the cases of alleged electoral fraud, and reduce the risk of fraud taking place in future, Recommendation 8 of Lord Pickles's Review<sup>4</sup> of Electoral Fraud recommends the government should implement a form of identification that enhances public confidence and is proportional. The report highlights that Voter Identification is used in Northern Ireland and many other countries

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<sup>&</sup>lt;sup>1</sup>https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/our-views-and-research/our-research/electoral-fraud-data/2018-electoral-fraud-data

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

 $<sup>^{3}\ \</sup>text{https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/our-views-and-research/our-research/public-attitudes}$ 

<sup>&</sup>lt;sup>4</sup> https://www.gov.uk/government/publications/securing-the-ballot-review-into-electoral-fraud

across the globe including Canada, Germany and Finland. It also cites the Organisation for Security and Co-operation in Europe, Office of Democratic Institutions and Human Rights and the Electoral Commission have recommended the introduction of use of identification in polling stations in the UK in recent years. These organisations "see the lack of verification as too trusting and open to abuse".

- 8. Given the potential for electoral fraud, introducing photographic identification aims to ensure elections are even more secure and to increase public confidence in the electoral system. Alternative models, such as the mixed identification model, were evaluated during pilot studies. These were not pursued as they were deemed more difficult to administer and did not provide as much benefit in terms of increasing the security of elections.
- 9. The EC's Public Opinion Tracker also finds evidence that Voter Identification will strengthen the perception of security in polling stations, with "two-thirds of the public say[ing] that Voter Identification in polling stations would make them more confident in the security of the system".
- 10. There are concerns regarding the impact that Voter Identification may have on turnout, however, an EC Report<sup>5</sup> evaluating the 2018 pilots noted that "there is no evidence that levels of turnout in the pilot scheme areas were significantly affected by the requirement for polling station voters to show identification".
- 11. There is also a concern from civil groups that the introduction of Voter Identification may disincentivise electoral participation, with the Electoral Reform Society<sup>6</sup> arguing that strict Voter Identification laws disproportionately disadvantage already marginalised groups. The EC's Public Opinion Tracker 2021<sup>7</sup> found 4% of people currently eligible to vote say they don't have any of the existing photo identification which may be required under UK Government proposals. This is an increase from the Cabinet Office's Photographic Identification Ownership Survey (2021), which estimated that 2% of eligible voters would need Voter Identification. Further, the proportion of people without existing identification is higher among certain, more disadvantaged groups including the unemployed (11%), those who rent from a local authority (13%) or housing association (12%) and disabled people (8%).
- 12. To counter this, the UK Government proposals include provisions for free, locally issued Voter Authority Certificates for use at elections. The UK Government has engaged Civil Society Organisations representing marginalised groups to support the EC in creating a communications campaign for the policy to ensure all electors are aware of the requirements. The UK Government will continue to engage marginalised groups, and those who support them, through to implementation, to ensure they are aware of the requirements and that everyone who wants to vote in person is able to.
- 13. Voter Identification is a policy for which a legislative framework has been provided for in the Elections Act 2022. The policy measures are intended to strengthen our democracy, and ensure that our elections remain secure, fair, modern and transparent

# B. Policy Objective and Proportionality

14. Voter Identification is a policy for which a legislative framework has been provided for in the Elections Act 2022. The policy measures are intended to strengthen our democracy, and ensure that our elections remain secure, fair, modern and transparent

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bhttps://www.electoralcommission.org.uk/who-we-are-and-what-we-do/our-views-and-research/our-research/voter-identification-pilots/may-2018-voter-identification-pilot-schemes

 $<sup>^{6}\</sup> https://www.electoral-reform.org.uk/campaigns/upgrading-our-democracy/voter-id/$ 

- 15. The policy outcome is to deliver the Government's electoral integrity vision and its commitment to protect our democracy and ensure that it remains fit for the modern age. To ensure that those who are entitled to vote should always be able to exercise that right freely, effectively and in an informed way; and that fraud, intimidation and interference have no place in our democracy. The UK's electoral system must continue to command the trust and confidence of the voter. The government believes showing photographic identification is a reasonable and proportionate way to confirm that someone is who they say they are when voting, thus stamping out the potential for personation to take place at the polling station and giving electors the confidence that their vote is theirs and theirs alone.
- 16. The table below details the key objectives of Voter Identification and how these objectives will be measured as being successful.

**Table 1: Policy objectives** 

Objective	Measure
Reduce opportunities for electoral fraud in polling stations.	Reduced perceptions of fraud, measured via surveys.
	Data on the number of applications refused due to forged documents and/or lack of good likeness could be used as an indicator of reduced opportunity for fraud.
Increase public confidence and	Measured via an in-house public opinion survey (subject to
trust in the democratic process.	Ministerial approval) and the ECs annual tracker.

17. The approach taken in this IA is considered proportionate to the proposed changes outlined in the Elections Act, as it quantifies the economic impact of the various components of the Act where possible. Where evidence is not available, qualitative analysis has been produced to better understand the potential impacts of the Act.

# C. Description of options considered

- 18. The options considered for this Impact Assessment are:
  - **Option 0:** Do not legislate (do nothing): The current arrangements would continue whereby photographic identification would not be required at polling stations.
  - Option 1: This option requires electors to bring an appropriate form of photographic identification in order to cast their ballot in suitable elections. Further options were considered at the policy making stage and for primary legislation. Voter Identification is now part of the Elections Act 2022 therefore no further options are considered at this stage. This is the Government's preferred option.
- 19. Option 1 would deliver the UK government's objective of ensuring that our elections remain secure, fair, modern and transparent.

# D. Summary and preferred option with description of implementation plan

- 20. Electors will be required to show photographic identification at certain elections, local referendums and recall petitions in England, Wales and Scotland from May 2023 onwards. Table 2 outlines how Voter Identification will be used across the UK. This means the first elections to require photographic identification will be the English local elections in 2023. Identification documents will still be accepted even where they have expired, provided that the photograph remains a good likeness of the elector. This will ensure that the vast majority of electors will have access to acceptable identification, and that electors will not need to worry about renewing any documents that expire shortly before a poll.
- 21. The use of Voter Identification differs across the UK and is broken down in the table below.

#### Table 2: Voter Identification across the UK

England	All elections, local referendums and recall petitions		
Wales	Parliamentary Elections, Police and Crime Commissioner (PCC) elections and recall petitions		
Scotland	Parliamentary Elections and recall petitions		
Northern Ireland	Requirements to show photographic identification are already in place in Northern Ireland thus this Voter Identification Policy does not extend here		

- 22. Amendments to the Representation of the People Act (RPA) (1983) include changes to the parliamentary election conduct rules in Schedule 1 which requires electors to show photographic identification.
- 23. 23 forms of photographic identification are acceptable to vote (see Schedule 1 to the Elections Act 2022). Expired photographic identification will be accepted provided the photo is of a good enough likeness to allow polling station staff to confirm the identity of the holder.
- 24. Those without an approved photographic identification can apply for a free, local Voter Authority Certificate from their local authority. They can apply for this online, via GOV.UK, or in person. Electors can apply for the Voter Authority Certificate up to 6 working days before polling day and the Voter Authority Certificate will be posted to their address.
- 25. Communication to inform electors of the requirement will be in the form of a larger and enveloped poll card detailing the requirements and communications materials produced by the EC.
- 26. Polling stations will be provided with extra support to implement the policy, including training for staff, an extra poll clerk and suitable equipment to sensitively check identity, such as a privacy screen.

# E. Monetised and non-monetised costs and benefits of each option (including administrative burden)

- 27. Analysis to identify the cost of Voter Identification used a mixture of government data, survey-based evidence and commercial estimates. It used local electoral registration data from the Office for National Statistics (ONS) for 2021 for England, Wales and Scotland, to estimate the total number of registered electors in Great Britain. It then applied ONS population projections to estimate the yearly change in the electorate over the forecast period. The relevant cost components were then applied to these forecasts to estimate the total impact.
- 28. Unit costs are based on 2022 survey data aimed at Electoral Registration Officers and desk-based research where appropriate. Costs have also been scaled according to the percentage of the electorate voting each year, given that not all local authorities hold elections each year and costs will depend on the number of local authorities that hold elections. This has been calculated by using the GOV.UK election timetable to find out which LAs are holding elections each year. The electorate for each LA is found using ONS data, summed for all those holding elections in a given year, and dividing by the total GB electorate. Current equipment costs are based on desk-based research, but these estimates are subject to change based on ongoing discussions with commercial suppliers.
- 29. The analysis does not assess the impact of the policy on voter turnout. Year-on-year turnout comparisons are difficult due to the volatility of the electoral cycle. For example, local election turnout can vary significantly depending on whether elections take place at the same time as a general election, with turnout in Unitary Council local elections as high as 62.5% in 2015, decreasing to 33.3% in 2016<sup>8</sup>. The EC's evaluation of the 2019 Voter Identification pilots concluded that: "As in our evaluation of the 2018 pilots, it is not possible to draw a clear connection between the pilot scheme and any changes in turnout. Limited data is available and where it is available, the pattern is not consistent. We also know that turnout is volatile and dependent on several factors." It is infeasible to robustly model the causality between Voter Identification and turnout.

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<sup>&</sup>lt;sup>8</sup> Data collated in House of Commons Library briefing paper, Turnout at elections, Number CBP 8060, 25 November 2020

30. Throughout the process, the Government has engaged with and sought feedback from the electoral sector, to ensure cost assumptions are as robust as possible and to support an effective rollout. Engagement has primarily been with Electoral Registration Officers through an Expert Panel, the EC, the Association of Electoral Administrators and civil society organisations reflecting protected characteristics.

# **E.1 Monetised impacts**

#### E.1.1 Direct monetised costs

# Extra poll clerk

- 31. The introduction of mandatory photographic identification in polling stations requires extra staffing resource. During the pilots, some LAs raised the need, through qualitative semi-structured interviews, for additional poll clerks to help administer the additional identification checks on polling day, whilst other LAs did not think extra help was necessary. The number of additional poll clerks hired varied between LAs. This need was further substantiated based on engagement with the Association of Electoral Administrators.
- 32. In the rollout year of the policy (financial year 23/24) and every year when a general election is expected, all polling stations will have funding for an extra poll clerk. This is intended to facilitate photographic identification checks. Poll clerks work from 6:30am 10:30pm, which is 16 hours per day. Poll clerks are to be paid an appropriate daily rate of £18 per hour. The number of polling stations is based on the 2019 General Election.
- 33. The total cost of extra poll clerks is estimated to be between £11.8m and £19.7 with a central estimate of £15.8m (22/23 prices, 10-year PV).

#### Poll cards

- 34. Currently, most poll cards are A5 in size and not posted in an envelope. Under the new proposals, poll cards will be re-designed to include reminders of the requirement for Voter Identification in polling stations and what types of identification will be accepted. The poll card will be increased from A5 to A4 to account for the additional information and will now be posted in envelopes. The majority of electors cited official local sources of information as the main channel for how they became aware of the identification requirements in the post wave Cabinet Office evaluation of the 2019 pilots, with 58% in the photographic identification pilots citing poll cards as a main source of information, suggesting they are an effective form of communication.
- 35. The poll card will now be enveloped too, and this supports the delivery of the poll card through Royal Mail. Thus, the new poll card is a key communications product to ensure electors are informed.
- 36. The additional cost of the new poll card compared to the counterfactual has been costed. The cost of the card, printing, enveloping and postage is considered and expected to be £0.11 more expensive per poll card. The number of poll cards required varies annually, depending on the percentage of the GB electorate who is eligible to vote. When a local authority has two elections taking place at the same time, such as a local and Police and Crime Commissioner election, poll cards are combined. However, the modelling does not combine general elections as the date of the next general election is not certain.
- 37. The total cost of the poll cards is estimated to be between £29.2m and £48.7m, with the central estimate of £38.9m (22/23 prices, 10-year PV).

<sup>9</sup> 

- 38. The latest EC 2022 data<sup>10</sup> found that 3.14% of those surveyed lacked any form of photographic identification and a further 1.14% lacked approved photographic identification where they were recognisable. Modelling assumes that 4.28% of the GB electorate will therefore need a free Voter Authority Certificate. In the rollout year and every parliamentary general election year, demand is modelled at 4.28% and 2.14% otherwise to reflect lower turnout and thus need for other elections.
- 39. The same EC data reveals that of those lacking a valid form of photographic identification, approximately 29% probably or definitely would not apply for the Voter Authority Certificate. However, no adjustment is made for this. Similarly, the modelling does not include those with valid forms of photographic identification applying for the free Voter Authority Certificate due to significant uncertainty in this. Communications and the digital application process will mitigate this risk.
- 40. The Voter Authority Certificate has two components. The former involves processing by the Electoral Registration Officer and the latter involves the manufacturing of the Voter Authority Certificate by a 3<sup>rd</sup> party supplier.
- 41. The Electoral Registration Officer, or their staff, will use a digital portal to process Voter Authority Certificate applications, choosing to accept, request further information or reject the application. The modelling uses 2022 survey-based data on the time it takes to process aspects of the application and considers each stage of processing that is required. This is the time for identification and registration checks, time for registration exceptions, time for identification exceptions and identification attestations. The time is calculated for online and paper applications and weighted by the percentage of applications online versus paper applications. Then this time is weighted by the percentage of applications required to go through each stage. On average, Electoral Registration Officers are expected to spend 6 minutes processing each Voter Authority Certificate application. When multiplied by the average wage of electoral registration staff, at 30p per minute, each Voter Authority Certificate application costs approximately £1.90 to process.
- 42. Approved applications will be sent to the supplier to produce the Voter Authority Certificate. This is an A4 paper document with security features. The cost per Voter Authority Certificate (the unit production cost) varies annually depending on the units produced. This cost involves the paper stock, security features, enveloping, postage and fixed costs. For commercial reasons a more detailed breakdown is not possible, and the unit cost of the Voter Authority Certificate has not been disclosed.
- 43. Some electors choose to remain anonymous on the electoral register. Based on 2018 EC data, the percentage of anonymous electors per constituency is 0.007%, but this has been rounded to 0.01% to be conservative. To enable them to vote, Electoral Registration Officers will produce Anonymous Elector Documents for them. This is a relatively minor cost of less than £0.1m over 10 years. It is included in the cost line for the Voter Authority Certificate.
- 44. The total cost of the Voter Authority Certificate is estimated to be between £19.6m and £32.7m, with the central estimate of £26.2m (22/23 prices, 10-year PV).

# Equipment

- 45. To ensure they are able to vote, electors can apply for a free Voter Authority Certificate from their local authority. Some electors may choose to apply for this in person, as opposed to online. Electoral Registration Officers (Electoral Registration Officers) will have funding to purchase a digital camera if necessary to enable them to take a photo of the elector for their Voter Authority Certificate. The digital camera is costed at £120 per unit, based on desk-based research.
- 46. Some Electoral Registration Officers will also have funding for a printer and scanner. In exceptional circumstances, such as the loss of an elector's Voter Authority Certificate, the Electoral Registration Officer can use this item to print off a temporary Voter Authority Certificate, ensuring

<sup>&</sup>lt;sup>10</sup> https://www.electoralcommission.org.uk/sites/default/files/2022-05/2018-2022%20Data%20table%20Public%20Opinion%20Tracker.xlsx

the elector can vote. The printer and scanner is costed at £130 per unit, based on desk-based research.

- 47. On polling day, poll clerks and presiding officers will be responsible for checking electors' photographic identifications. Sensitivity will be expected for those with religious headwear. To facilitate identification checks, all polling stations may purchase a privacy screen, if they lack a private room or area for the identification check. A mirror is also provided to all polling stations to facilitate the readjustment of headwear. The privacy screen is costed at £30 per unit and the mirror at £1 based on desk-based research.
- 48. The total cost of equipment is estimated to be between £1m and £1.7m, with a central estimate of £1.3m (22/23 prices, 10-year PV).

## Storage

- 49. Local authorities can obtain funding for storage space to store the equipment. Feedback from the sector earlier this year highlight concerns around how this equipment was expected to be stored, noting that the average local authority may have up to 100 privacy screens to store in some cases.
- 50. Funding for 75 square foot of storage space is provided to 2/3s of local authorities, on the basis that not all will need this storage. Costs are based on an industry report's UK average<sup>11</sup> and storage will be offered for the entire ten years analysed in this Impact Assessment, with unit cost of £27 per square foot.
- 51. The total cost of storage is estimated to be between £2.9m and £4.9m, with a central estimate of £3.9m (22/23 prices, 10-year PV).

# By-elections

- 52. By-elections occur when an elected office is vacated prior to an ordinary or general election. Persons wishing to vote at polling stations at by-elections will also require photographic identification in order to vote. It is assumed that there are 600 by-elections annually with an average electorate size of 5000. This incurs costs through needing an extra poll clerk and the new poll cards
- 53. The total cost of by-elections for Voter Identification is estimated to be between £3.5m and £5.9m, with a central estimate of £4.7m (22/23 prices, 10-year PV).
- 54. However, it is important to note that forecasting the number of by-elections is highly uncertain as they do not follow a particular trend. Therefore, this is a best estimate based on historical by-elections data provided to us by the Association of Electoral Administrators (AEA).

# Training & contact centres

55. Funding will be provided to local authorities' electoral services teams to support the delivery of the policy. Funding will be provided for one day of training on the legislative changes and one day of training on the ERO portal. Training attendance was estimated at £200 per day per trainee based on commercial pricing for face-to-face training. Funding is provided for all staff from electoral services teams, estimated based on the survey to electoral services teams which asked about staffing.

<sup>11</sup> https://www.ssauk.com/resource/2022-ssa-uk-industry-report.html

- 56. Training is also provided to polling station staff, to train them how to conduct identification checks at the polling station. The length of training and delivery mechanism is based on engagement with the AEA.
- 57. Local authorities may receive calls from residents enquiring about the policy. Funding is provided to local authorities to support this, enabling them to hire additional staff to deal with increased call volumes. The modelling assumes that there will be one additional contact centre worker for every Local Authority for the two months leading up to the election in the first two years of the policy. Salary costs of contact centre works are estimated to be £16.35 per hour, and this is based on feedback from the sector.
- 58. The total training and contact centre costs are estimated to be between £11.9m and £19.8m, with a central estimate of £15.9m (22/23 prices, 10-year PV). However, it is also important to note that this contact centre costs cover all policies, not just Voter Identification.

Cost impact for the Electoral Commission

59. The EC is the independent body which oversees elections and regulates political finance in the UK. The EC will be running a Voter Identification public awareness campaign with **an expected cost of £5.1m** (22/23 prices,10-year PV).

#### **E.1.2 Indirect monetised Costs**

60. There are no monetisable indirect costs for Voter Identification.

#### E.1.3 Direct monetised benefits

61. There are no monetisable direct benefits for Voter Identification.

#### E.1.4 Indirect monetised benefits

62. There are no monetisable indirect benefits of Voter Identification

#### E.1.5 Summary

63. Voter Identification has a total economic cost of £111.8m over 10-years (present value). The table below provides a cost profile by components of the policy. Note that all costs discussed are economic and do not reflect the financial outlay by central government.

Table 3: 10-year economic profile of Voter Identification Costs (Present Value in £ million)

	Low	Central	High
Extra poll clerks	£11.8m	£15.8m	£19.7m
Poll cards	£29.2m	£38.9m	£48.7m
Voter Authority	£19.6m	£26.2m	£32.7m
Certificate			
Equipment	£1m	£1.3m	£1.7m
Storage	£2.9m	£3.9m	£4.9m
By-elections	£3.5m	£4.7m	£5.9m
Training & Contact	£11.9m	£15.9m	£19.8m
Centres			
EC communication	£3.8m	£5.1m	£6.4m
costs			
Total	£83.8m	£111.8m	£139.7m

Figures may not sum due to rounding

# **E.2 Non-monetised impacts**

#### E.2.1 Direct costs

Cost of obtaining a Voter Authority Certificate

64. Whilst Voter Authority Certificates are free, there may be a cost associated with completing an application. There will be a time cost for those completing the application online or in person. There may also be a travel cost for those applying in person. This may be particularly true for those who live in large, rural local authorities or those who rely on public transport. This cost is not monetised as there is no data on the average travel time to a local authority office, or how long an application would take, and therefore any estimate would not be robust. Most applicants are expected to apply online, so this travel cost is expected to be minimal.

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

- 65. Most people who turned up at the polling station during the 2018 and 2019 Voter Identification pilots were able to cast their vote. The pilot studies found that a very small number of people who did not have the correct identification did not return to vote. This was 0.4% of all people asked for identification in the photographic identification model in the 2019 pilot. There is no evidence of why these individuals did not have the correct identification or did not return. It is possible that a minority were unaware of the requirement. In a separate survey carried out by the EC after the May elections in 2019, 13% of people who did vote at polling stations in pilot areas said they were unaware of the requirement to bring a form of identification with them<sup>12</sup>. The EC's communications campaign for this policy would seek to ensure that all voters are aware of the policy and the opportunity to apply for a free Voter Authority Certificate.
- 66. Overall, a small minority of electors who did not vote in the 2018 and 2019 pilot studies cited identification requirements, such as not having the correct identification, as the reason for not casting their vote. In post-election polling commissioned by the Cabinet Office<sup>13</sup>, 2% of those who said they did not vote (34 out of 1,749) citied not having the correct Identification as a reason, which was a similar proportion to the 2018 pilots. The 2019 Cabinet Office pilot evaluation found that the main reason cited across all models for not voting was a lack of time (between 13% and 20% of those who reported not voting in each model).
- 67. The EC's 2019 evaluation found a similar proportion (1% of those who did not vote), said this was because they did not have identification<sup>14</sup>. Very few stated they did not vote because they disagreed with the requirement. The EC's post-election survey found that less than 0.5% of those who reported not voting in the May elections in pilot authorities did so because they did not agree with the identification requirement.

Police investigation and justice system costs

- 68. The police may investigate cases of electoral fraud at polling stations. This is not monetised because the number of cases that will need police investigation are unknown and likely to be small in number since Voter Identification makes personation more challenging. Additionally, the cost of a police investigation is unknown and highly dependent on the specific case.
- 69. Linked to the above, accusations of electoral fraud may be taken to court where numerous parties will incur a cost. This has not been costed due to the lack of data on the number of cases that would be taken to court.
- 70. Secondly, it may be that an individual goes to court to appeal against being refused a Voter Authority Certificate. There is no data on the likelihood of this occurring, although it is expected to

Local Elections 2018 - Evaluation.pdf

 $<sup>\</sup>frac{12}{2} \text{ https://www.electoralcommission.org.uk/sites/default/files/2019-07/Post%20poll%20ID%20pilot%202019%20data%20tables%20BMG.xlsx} \\$ 

<sup>13</sup> https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment data/file/733128/Electoral Integrity Project -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/819404/2019\_Voter\_ID\_Pilots\_Evaluation.pdf

be incredibly rare or non-existent. Individuals have numerous stages to provide their identity and receive the Voter Authority Certificate, such as an attestation by someone else. Similarly, there is no data on what such a court case may cost and thus this impact has not been costed.

## E.2.2 Indirect costs

More people opting for postal votes

- 71. The new requirements for voting in person outlined above may lead to more people opting for postal or proxy voting, which could potentially increase costs to the UK government. However, the EC's 2018 evaluation of the Voter Identification pilot did assess the impact on postal voting and found no evidence of any notable move towards postal voting instead of polling station voting in any of the five pilot areas.
- 72. In addition, the results from a 2021 survey commissioned by the Cabinet Office showed that the majority, 89%, said having to present photographic identification would make no difference to how they would vote. Whilst some, 5%, said it might make them less likely to vote in person, a similar amount, 5%, said it would make them more likely to vote in person. Furthermore, as a similar process is required to prove one's identity if applying for a postal vote, it is unlikely that many individuals to switch from voting in person to post. Therefore, these costs are expected to be minimal and have not been quantified.

#### **E.2.3 Direct benefits**

Increased belief that there are sufficient safeguards to prevent electoral fraud

- 73. While overall concern about electoral fraud among the electorate is low, authorities in the 2019 pilots trialling the photographic identification model were the only authorities to show an increase in those disagreeing that there is enough electoral fraud in polling stations to affect election results, with 35% saying they strongly or tended to disagree, up from 30% prior to polling day. This was largely driven by the Pendle pilot.
- 74. In addition, the photographic identification model saw significant increases from before polling day to after polling day in the belief that there are 'sufficient safeguards' to prevent electoral fraud in polling stations, from 57% to 63%, and that voting at polling stations is safe from fraud and abuse with 90% agreeing with this, up from 85%. Conversely, people in other areas of England holding elections were more likely to disagree after polling day that there are sufficient safeguards in place (20% after polling day, up from 16% before polling day). These improvements in perceptions of local electoral integrity were also seen in the 2018 photographic identification pilot in Woking.
- 75. There was mixed evidence of the impact the 2019 photographic identification models had on perceptions of the incidence of electoral fraud in the local area. In Woking there was a substantial decrease in perception that there is a great deal or fair amount of electoral fraud at the polling station in their area from 14% to 9%. This was not the case in Pendle where a third of respondents felt that fraud takes place in their local area, which remained unchanged from before the election 15.
- 76. The EC's evaluation of the 2019 pilot noted "It is not possible to assess whether the identification requirement prevented any actual attempts to commit personation fraud" and that "There is no evidence to suggest that the absence of allegations in the pilots was because of the identification requirements." However, when evaluating the security strengths and weaknesses of each model it found "the photographic identification only model has the greatest security strengths compared with the other models". The policy addresses the EC's recommendation from its 2014 review into electoral fraud that electors should be required to show proof of their identity before they can be issued with a ballot paper at polling stations for elections and referendums in Great Britain<sup>16</sup>. It also

<sup>15</sup> 

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/819404/2019\_Voter\_ID\_Pilots\_Evaluation.pdf <sup>16</sup> https://www.electoralcommission.org.uk/sites/default/files/pdf\_file/Electoral-fraud-review-final-report.pdf

brings the UK in line with practices by many other countries where voters are required to present some form of identification in order to vote<sup>17</sup>.

## Increased satisfaction in the electoral process

- 77. In the 2018 photographic identification pilot in Woking, satisfaction with the process of voting increased substantially post-election day (82% to 90%). This was eight percentage points higher than the England control group which suggests that, overall, taking part in the photographic identification model had a positive impact on perceptions of the voting process<sup>18</sup>. In 2019, levels of satisfaction in the process of voting in photographic identification pilot areas remained stable after polling day (83%, up from 82% prior to polling day), as did confidence in knowing how to cast their vote (96%, compared to 95% prior to polling day)<sup>19</sup>.
- 78. However, in the EC's 2019 evaluation satisfaction with the process of voting decreased postelection day, both in pilot areas (73% in mixed pilot areas, 69% for photo pilot areas and 68% for poll card pilot areas, compared to 83% for all pilot types in the pre wave) and across England as a whole (62% in the post poll, compared to 77% in the Winter Tracker survey)<sup>20</sup>. Since this was seen at national level as well as in pilot areas, they concluded that this suggested the pilots were not the cause of the increase.

## Increased perceptions of electoral integrity

- 79. The EC's 2022 nationally representative survey<sup>21</sup> found that 22% of respondents felt elections were not well run. Of these individuals, 37% felt that elections are affected by fraud or corruption. While 16% of all those surveyed felt that increased security against electoral fraud would be the most likely reason to increase your satisfaction with the process of voting at elections.
- 80. The same survey found that 62% of participants felt that introducing a requirement for photographic identification at polling stations, which the Voter Identification policy does, would make voting in an election more secure.

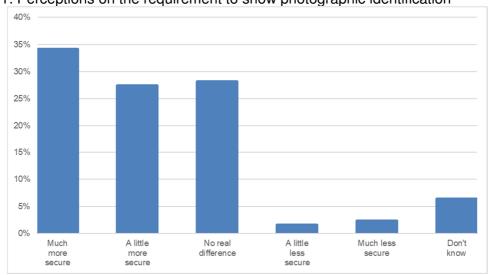


Figure 1: Perceptions on the requirement to show photographic identification

81. Overall, more participants felt that a requirement for photographic identification at polling stations (43%) would improve the way elections are run in the UK. 43% agreed it would improve the way elections are run versus 31% who disagreed that it would improve elections. 20% of participants disagreed that there are currently sufficient safeguards to prevent electoral fraud (pre-implementation of Voter Identification). 28% of participants felt that being required to show some

<sup>21</sup> https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/our-views-and-research/our-research/public-attitudes

 $<sup>^{17}\</sup> https://www.electoralcommission.org.uk/sites/default/files/pdf\_file/Electoral-fraud-review-final-report.pdf$ 

<sup>18</sup>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/733128/Electoral\_Integrity\_Project\_\_ \_Local\_Elections\_2018\_-\_Evaluation.pdf

form of photographic identification would be the most effective option in preventing electoral fraud from taking place in the UK. In the 2021 EC tracker survey, 66% of participants felt that a requirement for voters to show identification at the polling station would make them more confident in the security of the voting system.

82. Voter Identification may therefore improve electors' trust and confidence in the electoral system, which can improve perceptions of electoral integrity and have further beneficial impacts for society. This can include increased turnout in elections, a topic covered in academic literature. Birch (2010)<sup>22</sup> found that citizens perceiving elections to be fair are more likely to vote than those who have reservations, and that confidence in the electoral process is associated with an increased probability of voting of 4.8 percent. Survey findings suggest that a requirement to show identification at polling stations may make voters more confident in the security of the voting system, which could, in turn, have a positive impact on turnout and general satisfaction with the electoral system. However, as noted below, assessing the causal impact of Voter Identification on turnout is complex as adequate data to control for the numerous factors that affect turnout is lacking.

#### E.2.4 Indirect benefits

Increased engagement with vulnerable groups and civil society groups

83. Local authorities' engagement with the equality duty was found to increase across all authorities that took part in the 2019 Voter Identification pilots. Authorities viewed this as a positive engagement exercise with vulnerable groups and civil society groups. Most electoral services teams reported wanting to continue work on coordinating equality impacts, although some flagged that they would need an additional dedicated resource in the event of national rollout<sup>23</sup>.

#### Increased sales for businesses

84. Local authorities will be buying additional equipment for use in polling stations to assist with the implementation of Voter Identification when voting. This directly benefits the businesses supplying this equipment through increased sales, and therefore profit. Businesses will also benefit from increased postage resulting from Voter Identification, including from poll cards now being larger and being posted in envelopes and additional letters being sent to anonymous electors, increasing sales for printing and postage businesses. However, these benefits have not been monetised as there is no data regarding how much profit businesses would make on these sales, and it is therefore not proportionate to quantify this estimate.

# **E.3 Sensitivity Analysis**

85. The above analysis models the central scenario. However, as there is inherent uncertainty with modelling need and demand for Voter Authority Certificate, analysis has been conducted to estimate the upper and lower bound of the demand for Voter Authority Certificate. This is in line with Green Book principles.

# E.3.1 Low Scenario

86. In this scenario, the need for the Voter Authority Certificate is set at 2%. This matches the findings from the 2021 IFF Study which reported need at 2% of the electorate. This estimate is based on those who do not have any form of photographic identification. This is in contrast for the central scenario which models need at 4.28%, based on 2022 EC data. Under the low scenario, the estimated total costs and benefits are £107.2m and £0 respectively, thus resulting in an estimated NPSV of -£107.2m (10-year PV, FY 2022/23 prices).

<sup>&</sup>lt;sup>22</sup> Birch, S. (2010) 'Perceptions of Electoral Fairness and Voter Turnout', Comparative Political Studies, 43(12), pp. 1601–1622. doi: 10.1177/0010414010374021.

<sup>23</sup> 

# E.3.2 High Scenario

87. In this scenario, the need for the Voter Authority Certificate is set at 7.5%. This matches 2015 EC modelling<sup>24</sup>. Under the high scenario, the estimated total costs and benefits are £117.9m and £0 respectively, leading to an estimated NPSV of -£117.9m (10-year PV, FY 2022/23 prices).

# E.3.3 Poll Card Costs

88. The other variable which could have an impact on total costs is the additional cost of the poll card, which will now be A4 rather than A5 (as it currently is). The central estimate assumes that the additional cost of the poll card is £0.11. If this were to be cheaper and fall to £0.08 per poll card, the total NPSV would be -£101.2m (10-year PV, FY 2022/23 prices). Similarly, if it were to be more expensive at £0.14 per poll card, the total NPSV of Voter Identification would be -£122.4m (10-year PV, FY 2022/23 prices).

# F. Impacts for businesses, trade and investment

- 89. The Business Net Present Value is expected to be £0 as there are no impacts on businesses which could be included in the scope of the BNPV. Whilst some businesses (for example, those supplying additional equipment, printer manufacturers, delivery companies etc) may benefit from increased profit as a result of the introduction of this policy, it is not proportional to quantify due to the lack of available information around the profit margin of the businesses involved and is therefore excluded from the BNPV. Some businesses will receive additional revenue from postage and production, but this takes place via local authorities thus is deemed to be indirect. It is therefore excluded as a business impact.
- 90. There are no impacts for trade since this domestic policy affects the electoral system rather than businesses.
- 91. There are no direct impacts for investment. However, strengthening the UK's electoral system could have beneficial consequences for domestic investment and foreign direct investment (FDI)<sup>25</sup>. However, owing to the relatively minor change in democracy, this could be a small impact.

# G. Wider impacts

- 92. Some of the electorate may not have access to photographic identification and may require a Voter Authority Certificate. All electors will have the opportunity to apply for a free form of photographic identification, the Voter Authority Certificate, to ensure all eligible electors can vote. Electors can apply for this online, by paper or in person. It is anticipated that most electors will apply online. The online application process has undergone user testing and is designed to meet the leading government digital standards for accessibility.
- 93. For those unable to apply online or by post, there may be costs in applying in person, relating to travel and time to reach the local authority office/outreach. This could be a concern to individuals living in rural areas, and for older people and those with dependents or other time commitments. To mitigate this, electors can be supported by other family or friends who can fill out the Voter Authority Certificate application on their behalf.
- 94. There is evidence that certain protected characteristics may find it harder to access identification, which the provision of a free Voter Authority Certificate is designed to address. Analysis of wider impacts on particular groups is based on the IFF's 2021 photographic identification ownership

<sup>&</sup>lt;sup>24</sup> https://www.electoralcommission.org.uk/sites/default/files/pdf\_file/Proof-of-identity-scheme-updated-March-2016.pdf

<sup>&</sup>lt;sup>25</sup> Li, Q. and Resnick, A. (2003) "Reversal of fortunes: Democratic Institutions and foreign direct investment inflows to developing countries," International Organization, 57(1), pp. 175–211. Available at: https://doi.org/10.1017/s0020818303571077.

- study, conducted on behalf of the Cabinet Office<sup>26</sup>. The protected characteristics of groups of people who may find the introduction of the Voter Authority Certificate of particular relevance are age, race, disability, gender reassignment and religion<sup>27</sup>. This has been outlined below.
- 95. **Age:** The 2021 Cabinet Office commissioned survey of photographic identification ownership found that those aged 50-69 were slightly less likely to hold photographic identification (3% did not hold the accepted forms of identification, compared to 2% overall), while those from the youngest age group (18-29) were slightly more likely to own photographic identification (1% did not hold the accepted forms of identification). This research found older populations (those aged 50-69 and 70+) were more likely than people overall to report that the introduction of identification at polling stations will make it quite difficult or very difficult to vote.
- 96. **Ethnicity:** Evidence from the survey suggests that there are small differences in photographic identification ownership between ethnic groups. The percentage of individuals from minority ethnic groups (excluding white minorities) who have no photographic identification (1%) was lower than those who identify as White (2%).
- 97. **Electors with a disability:** Evidence from the survey suggests that people with disabilities are less likely to hold the accepted forms of photographic identification. Individuals with a severely limiting disability were less likely to hold photographic identification than people overall (with 5% not holding accepted forms of photographic identification). Furthermore, individuals with severely (13%) or somewhat (8%) limiting disabilities were more likely than those with no disabilities (4%) to report that the identification requirement would make it difficult or very difficult to vote.
- 98. Electors who are transgender or non-binary: There is a lack of quantitative evidence to understand the impact of access to identification on individuals who have experienced gender reassignment so there is a reliance on representative organisations to highlight any anticipated impacts. The EC evaluation noted that charities representing transgender or non-binary persons highlighted that a person's identification may not reflect their gender expression or identity.
- 99. **Religion:** The 2021 survey found no statistically distinguishable difference in photographic identification ownership by religion, however for some subgroups the base number of respondents was too low for reliable statistical comparisons to be made. Polling station staff will be given appropriate training and secondary legislation will include a requirement for voters to be able to present their identification in private in polling stations to support voters from groups who may have specific issues with the act of confirming their identification, including people who wear face coverings for religious reasons who may not wish to remove their face covering in a polling station.
- 100. **Employment status and educational qualifications:** Ownership of identification varies by employment status and educational qualifications. People with no qualifications, and people with Level 2 qualifications, were less likely to hold the accepted forms of identification (6% of people with no qualifications and 3% of people with Level 2 qualifications did not hold the accepted forms of identification). In addition, people who were unemployed were less likely to hold the accepted forms of identification, where 8% of people who were unemployed did not own any of the forms of identification.
- 101. **Geographic location:** In addition to the potential impacts explored for protected characteristics, our survey found ownership of identification can vary by electors' location. People in the West Midlands and the South West were less likely to own the accepted forms of photographic identification (4% of survey respondents in the West Midlands did not hold the accepted forms of photographic identification, and 3% of respondents in the South West did not, compared to 2% overall). People in London were more likely than people overall to own accepted forms of photographic identification (where 1% did not hold the accepted forms of photographic identification).

<sup>27</sup> 1 Our analysis reports on sub-groups where they are significantly different from the overall sample, at the 95% confidence level. In the survey, there was no statistically distinguishable difference in photographic identification ownership

 $<sup>^{26}\</sup> https://www.gov.uk/government/publications/voter-identification-photographic-id-ownership-in-great-britain$ 

- 102. **Sex**: No differences were found between men and women in their ownership of photographic identification.
- 103. No impacts on other protected characteristics such as marriage and civil partnership, pregnancy and maternity, or sexual orientation are expected.
- 104. The EC will run a comprehensive and targeted communications campaign, in different languages appropriate for the region, to ensure electors are aware of the requirement to bring photographic identification. Registration and polling station staff will be trained on how best to support electors. Furthermore, government has, and will continue to engage with civil society organisation, such as those relating to disability and race, to ensure electors with protected characteristics are supported.

# H. Risks

# H.1 Demand for a Voter Authority Certificate

- 105. The EC's 2022 tracker data is used in analysis, which models 4.28% of the electorate needing a free Voter Authority Certificate. Thus, modelling considers need as opposed to demand. This is because of the uncertainty in demand. Some individuals who lack photographic identification may not want a free Voter Authority Certificate. EC 2022 data suggests that 29% of those who lack suitable photographic identification would not apply for a free Voter Authority Certificate. This may be because these individuals do not historically vote.
- 106. On the other hand, some applicants will already have appropriate and acceptable photographic identification but may choose to apply for the Voter Authority Certificate. 2021 IFF survey evidence suggests 31% of people in Great Britain would apply for one when given a basic description of it. However, this did not convey to participants that they would need to apply for the Voter Authority Certificate, a process which would take some time. Electors applying for a Voter Authority Certificate which they do not need could be due to numerous reasons including communications materials, media coverage, risk aversion and confusion.
- 107. This impact could substantially increase costs of the policy and impose a burden on Electoral Registration Officers and their staff. This impact is highly uncertain, but communications materials and the digital application process on GOV.UK will seek to reassure these applicants that they do not need a Voter Authority Certificate and can vote without concern. To mitigate this risk, low and high ranges have been considered for this assumption, which are believed to appropriately cover the uncertainty, as seen in the sensitivity analysis section.

# H.2 Electors forgetting their Identification

- 108. Some electors may forget their photographic identification when they go to vote. 2022 EC data suggests that 22% of participants do not usually carry a form of acceptable photographic identification when they leave their house. However, this question was in the context of day-to-day life and not specifically for voting. The larger poll card and further communications campaigns will seek to minimise this risk, ensuring the requirements are clear and well understood.
- 109. However, some electors who forget their photographic identification may choose not to return to the polling station to cast their vote. The EC's 2022 survey suggests that 63% of those who forget their photographic identification would return later to vote in a general election, with 30% unlikely to return, in a hypothetical question asked.

# H.3 Causal impact on turnout

There is a risk that the true impact of the policy on turnout and on electoral fraud cases is misunderstood. Some may believe a fall in turnout is due to Voter Identification, which could translate into negative publicity for local and central government. However, levels of turnout fluctuate year-on-year as a result of a range of factors such as weather, type of election and

whether the election is scheduled or snap. Variation in turnout even occurs between the same types of elections.

- 111. The pilot evaluations were unable to assess the impact on turnout or on the number of allegations or proven cases of electoral fraud. This is also impacted by limited comparable data in some instances, such as where pilot areas had recent boundary changes. Regarding the impact on electoral fraud, the EC concluded in 2019 that "It is not possible to assess whether the identification requirement prevented any actual attempts to commit personation fraud. There is no evidence to suggest that the absence of allegations in the pilots was because of the identification requirements".
- 112. Ultimately, assessing the causal impact of Voter Identification on turnout is complex, as adequate data on the numerous factors that need to be controlled for is lacking.

# I. Monitoring and Evaluation

# **I.1 Monitoring**

113. Government will monitor the effectiveness and success of this policy, by collecting monitoring data and tracking progress against objectives. The legislation requires polling station staff to collect the data, and the Electoral Registration Officer to collate the data and share with the Government. For Voter Identification this data may include data on those refused a ballot due to not having acceptable identification, and the number of electors who later return with appropriate identification, applications for and usage of the Voter Authority Certificate and more.

# **1.2 Evaluation**

- 114. The Elections Act 2022 requires the impacts of the Voter Identification policy to be evaluated at the first two parliamentary general elections to which it applies and the first standalone set of ordinary local elections. Voter Identification must therefore be evaluated at the 2023 local elections and next two parliamentary general elections thereafter. Evaluation will support post-legislative scrutiny, which under section 62 of the Act is provided for formally to take place for all measures in the Act after 4 years (and within 5 years) from Royal Assent.
- 115. The evaluation will collect public opinion data, pre- and post- implementation, to assess the impacts of Voter Identification on public confidence in the electoral system and voting behaviour. DLUHC are finalising additional plans for the evaluation, which will include analysis of monitoring data, and research with electoral teams.
- 116. In addition to this, the independent EC will evaluate Voter Identification and publish its findings online.