

<b>Title:</b> The Representation of the People (Overseas Electors etc.) (Amendment) (Northern Ireland) Regulations 2024 <b>IA No:</b> DLUHC Elections 03 (2023) <b>RPC Reference No:</b> N/A <b>Lead department or agency:</b> DLUHC <b>Other departments or agencies:</b> NIO	<b>Impact Assessment (IA)</b>
	<b>Date:</b> 16/10/2023
	<b>Stage:</b> Secondary
	<b>Source of intervention:</b> Domestic
	<b>Type of measure:</b> Secondary Legislation
	<b>Contact for enquiries:</b> electionsresearchanalysismailbox@levellingup.gov.uk
<b>Summary: Intervention and Options</b>	<b>RPC Opinion: Not Applicable</b>

Cost of Preferred (or more likely) Option (in 2023 prices)			
Total Net Present Social	Business Net Present Value	Net cost to business per year	Business Impact Target Status
-£40.8m	£-	£-	Not a regulatory provision

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

The Government’s manifesto included a commitment to ‘make it easier for British expats to vote in Parliamentary elections and get rid of the arbitrary 15-year limit on their voting rights.’ The Government does not view simply living overseas as sufficient justification for removing the right to vote in UK Parliamentary Elections, however, does recognise the need to demonstrate a strong degree of connection to the UK. As such the Elections Act 2022 extended the overseas franchise to all British citizens who have been previously registered or resident in the UK, removing the existing 15-year limit.

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

The intention is that the instruments should commence the changes to the overseas franchise and create a workable registration system for electoral administrators that minimises time-consuming processes and ensures there are feasible means by which persons applying to register can have their eligibility determined. The instrument also ensures existing overseas electors are transitioned onto the new 3-year fixed point renewals framework and establishes a consistent approach to the renewal of overseas electors’ registration and (for overseas electors registered in England, Scotland and Wales only) their absent voting arrangements. Northern Ireland overseas electors are entitled to an absent vote by virtue of registration so there is no requirement to renew their arrangement for the period they remain registered. The instruments also maintain electoral integrity by establishing proportionate barriers to fraudulent activity.

**What policy options have been considered, including any alternatives to regulation?**

**Option 0 - Do Nothing:** The overseas electors changes legislated for in the Elections Act 2022 would not be commenced and the current franchise would not be updated to deliver the Government's manifesto commitment to enfranchise British citizens living overseas for life.

**Option 1 – Preferred Option:** Enable implementation of the changes to the overseas electors franchise, as legislated for in the Elections Act 2022. Make changes to registration and electoral administration processes to enable eligible overseas electors to register to vote successfully and Electoral Registration Officers to maintain their registers effectively. The changes include updates to an overseas elector's application and declaration, the processes by which an overseas elector may have their identity and connection to their qualifying address verified, and the process by which an overseas elector can renew their declaration to remain on the register.

Is this measure likely to impact on international trade and		No No		
Are any of these organisations in scope?	<b>Micro</b> No No	<b>Small</b> No No	<b>Medium</b> No No	<b>Large</b> No No
What is the CO <sub>2</sub> equivalent change in greenhouse gas emissions? (Million tonnes CO <sub>2</sub> equivalent)		<b>Traded:</b> N/A	<b>Non-traded:</b> N/A	
<b>Will the policy be reviewed?</b> It will not will not be reviewed. <b>If applicable, set review date:</b> NN/A /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: Jacob Young MP Date: 20/10/2023

Description:

**FULL ECONOMIC ASSESSMENT**

Price Base Year 2023	PV Base Year 2023	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: -£30.6m	High: -£51.1m	Best Estimate: -£40.8m

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	-£2.6m	£3.7m	£30.6m
High	-£4.3m	£6.2m	£51.1m
Best Estimate	-£3.5m	£4.9m	£40.8m

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

*Identity and address verification* – The analysis estimates that the additional cost relating to the verification processes for newly enfranchised applicants’ identity and connection to a qualifying UK address will be £23.5m under the central scenario.

*Application outcome* – The analysis estimates that the additional cost relating to informing newly enfranchised overseas electors of the outcome of their application will be £5.1m under the central scenario.

**Other key non-monetised costs by ‘main affected groups’**

None.

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

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

There are no monetised benefits associated with this policy.

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

*Greater participation in UK democracy* - Removing the 15-year limit on expatriates' right to vote in UK Parliamentary elections will enable participation from a larger number of overseas electors.

*Improved registration process for overseas electors* - The registration period for overseas electors will extend from one year to up to three years, meaning overseas electors will not have to reapply as often. Streamlined processes will allow overseas electors to reapply or refresh their absent vote arrangements at the same time as renewing their registration. NI overseas electors will not need to refresh their absent vote arrangement as it will remain valid for as long as there is no break in the elector’s registration. The digitisation of the GB absent vote application process will make this process easier for overseas electors who typically vote by post or proxy and will be able to apply for their absent vote through an online service. This more efficient process will help to ensure that OEs are able to remain on the register for a longer period of time, with a valid absent vote arrangement in place. These changes will therefore ensure that OEs are more likely to be able to participate in by-elections and any elections called at short notice.

<b>Key assumptions/sensitivities/risks</b>	<b>Discount rate</b>	3.5%
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*The size of the overseas elector franchise* – there is no official data on the number of British citizens living abroad. United Nations migration data and Office for National Statistics International Passenger Survey data have been used to estimate this.

*The proportion of the newly eligible franchise who will take up the offer to register as an overseas elector is uncertain* – There is a high degree of uncertainty regarding the additional volumes of registration applications as a result of extending the overseas franchise to all British citizens who have been previously registered or resident in the UK.

**BUSINESS ASSESSMENT (Option 1)**

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

## Evidence Base

### A. Problem under consideration and rationale for intervention

1. The Government's 2019 manifesto included a commitment to "make it easier for British expats to vote in [UK] Parliamentary elections and get rid of the arbitrary 15-year limit on their voting rights".
2. The Elections Act 2022 (EA) made significant strides towards giving effect to these commitments, by extending the overseas franchise to all British citizens who have been previously registered or resident in the UK. The aim of this secondary legislation is to ensure that the changes in the EA can be implemented effectively, especially by making sure those newly enfranchised can register in a way that works for citizens and electoral administrators and is consistent with the ethos of the wider Electoral Integrity Programme.
3. The secondary legislation is also essential to the Government's commitment to 'make it easier for expats to vote,' and, in particular, to fulfil this commitment by making changes to encourage overseas electors (OEs) to remain on the register with an absent vote in place ahead of, and between, elections, thereby facilitating greater participation amongst British citizens living overseas. Having an absent vote arrangement in place ahead of an election will ensure that an OE's postal ballot can be sent out as soon as possible ahead of an election, maximising the time available for the ballot to be received and returned by the OE.
4. Before 1985 British citizens resident outside the United Kingdom were unable to register to vote in UK Parliamentary elections. When the franchise was extended to British citizens resident overseas for the first time, a time limit of 5 years of having lived outside the UK was introduced. This was changed to a 20-year limit in 1990 and then lowered to the current 15-year limit in 2002.
5. The Government committed to scrapping the 15-year limit and delivering 'votes for life' in its 2015, 2017 and 2019 manifestos. In line with these intentions, the then Government issued a public consultation in 2016 (a Government response to feedback on that consultation was published in 2018). These proposals shaped the Overseas Electors Bill (OEB), a Government-drafted and supported Private Members Bill that was introduced to Parliament in 2017 but fell at Report stage in 2019. The public consultation and OEB influenced the measures in the EA and the approach to secondary legislation set out in these instructions. In February 2022, while the Elections Bill was before parliament, the Government published a policy statement setting out, in some detail, the intentions for secondary legislation.
6. The changes to registration processes for OEs will be implemented by the electoral sector. Engagement on the design and implementation of the measures has been carried out with stakeholders in the sector, including the Electoral Commission and Association of Electoral Administrators, and a range of individual returning officers (ROs), electoral registration officers (EROs) and electoral administrators including the Chief Electoral Officer (CEO) for Northern Ireland (NI).
7. The UK Government is responsible for franchise and registration policy for reserved elections therefore the issue cannot be resolved without DLUHC and NIO intervention.

## **B. Policy objective and proportionality**

### **Policy objective**

8. When commenced, the OEs provisions in the EA 2022 will deliver ‘votes for life’ and extend the franchise for UK parliamentary elections to all British citizens living overseas who have been previously registered to vote or previously resident in the UK.
9. The EA, and the secondary legislation which flows from it, will also deliver improvements and consequential amendments to the registration process for OEs, including the processes by which applicants have their identity and connection to their previous UK address verified.
10. While these changes will result in a necessary increase in administration to register newly eligible electors, the policy has been designed to partially offset the impact of the extended franchise on administrators and to minimise, where possible, time-consuming processes. For example, the fixed point 3-year renewal process is intended to reduce EROs’ workload, particularly during peak electoral periods, and enable OEs to remain registered for a longer period of time, with an absent vote arrangement in place by completing a lighter-touch renewal process..
11. Digital developments will also increase the efficiency of the registration process, making checks against DWP data faster than they are currently and, where relevant, enabling applicants to provide supporting evidence at the point of application, again reducing EROs’ workload by making applications easier to process, and thereby reducing the potential for back-and-forth between elector and administrator. Due to technical limitations the DWP checks for NI applicants will, at implementation, remain manual but it is intended that, when ready, the new NI electoral management system will facilitate GB style checks.
12. The intention is that the secondary legislation should:
  - a. Ensure there are feasible means to determine the eligibility of persons applying to register, taking into account the range of circumstances in which OEs might be applying, including where applicants were never registered in the UK, or were of no fixed abode when they were resident in the UK, and including the use of supporting evidence provided by the applicant or accessed by the relevant ERO;
  - b. Create a workable registration system for electoral administrators that minimises time-consuming processes where possible, noting that the volumes of OE applications will vary across local authorities and the likelihood of applications being made close to elections;
  - c. Ensure existing OEs are transitioned onto the new 3-year fixed point renewals framework for both their registration and, for those registered in respect of a GB constituency, their absent vote arrangement. It should also establish a consistent approach to the renewal of their declaration and voting arrangement. For those registered in NI their absent voting arrangement will not need to be renewed for as long as there is no break in the individual’s overseas registration;
  - d. Maintain electoral integrity by establishing proportionate barriers to fraudulent activity, thereby maintaining levels of public trust and satisfaction with the running of elections.
13. The success of this policy will be assessed against EROs feeling confident with delivering the new requirements in accordance to the legislation and are able to apply them consistently, OEs being able to navigate the registration process easily and without being over-reliant on the exceptions process and being satisfied with the new process, all eligible OEs who wish to be registered are able to in time for an election with an absent vote

arrangement in place where required, and eligible OEs are not deterred from registering as a result of the new requirements. As a whole, the new process should ensure all eligible British citizens living abroad have the opportunity to demonstrate their eligibility and successfully register to vote, while maintaining appropriate safeguards to ensure the integrity of the registration process by ensuring the identity and qualifying details of every applicant are appropriately verified.

### C. Description of options considered

14. The options considered for this Impact Assessment are as follows:

- a. **Option 0 - Do Nothing:** The OEs changes legislated for in the EA would not be commenced: not only would the Government's commitment to votes for life for OEs not be met, but existing higher administrative burdens of processing individual applications for EROs would remain, without a new, more streamlined exceptions process and a fixed-point renewal date. If this SI is not introduced, the postal and proxy voting changes contained within the recent PPVR SI will apply differently to overseas electors, as the temporary arrangements introduced within that SI would last indefinitely, resulting in OEs only being entitled to postal vote entitlements for 12 months, and needing to provide new proxy vote signatures every 12 months.
- b. **Option 1 – Preferred Option:** Enable implementation of the changes to OEs - extending the franchise to British citizens who were previously registered or resident in UK and removing the 15-year limit as legislated for in the Elections Act 2022. Commence the franchise change and make changes to registration and electoral administration processes to enable OEs to register to vote successfully and EROs to maintain their registers effectively. The changes include updates to an OE's application and declaration, the processes by which an OE may have their identity and connection to their qualifying address verified, and the process by which an OE can renew their declaration to remain on the register. This is the Government's preferred option.

15. Option 1 would deliver the UK Government's objective of ensuring that elections remain secure, fair, modern and transparent.

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

16. These measures are expected to come into effect on 16 January 2024. The legislative framework for the measures has been provided for in primary legislation as part of the EA, and secondary legislation is needed to implement the measures. When commenced, these provisions will change the eligibility requirements for OEs to enable any British citizen resident overseas who was previously registered or resident to register to vote in UK parliamentary elections.

17. The EA contains several provisions designed to facilitate the transition of the registration of OEs, these cover:

- a. **Pre-commencement date declarations:**  
Under the EA, any OE registration applications made before commencement date will continue to be determined under the current law even if determined after commencement. This means they would be granted a 12-month entitlement and would only transfer to the new 3-year cycle if they renew their declaration (via the new-style renewal declaration).
- b. **Entitlement extension for existing OEs' declarations:**

As part of the transitional arrangements within the EA, there is the option to extend the period of entitlement for OEs in instances where their declaration would expire either on or shortly after commencement day. This option has been discounted and the specified day has been set as 16 January, the same as commencement day. In practice this means that existing OEs will see no change to their registration – it will continue to expire 12 months after their last declaration as per existing practice. EROs will continue to use the current timings for issuing renewal reminders for OEs registered under the current 12-month cycle but whose declaration expires after commencement.

**c. 3-year renewal process:**

Post-commencement declarants on the three-year cycle would receive their first renewal reminder after the 1 July in the year their declaration is due to expire, and a second one “a reasonable time after that”. In NI there will be no legislative requirement to send a second reminder although the CEO may choose to do so.

**d. Absent vote arrangements: postal votes:**

The postal vote renewal cycle for GB will be established when Postal and Proxy Vote Restrictions (PPVR) measures are commenced on 31 October 2023. OE changes come into force on 16 January 2024. A transitional arrangement clarifies what occurs for an OE, registered in GB, who applies for a postal vote in the period between PPVR and OEs measures commencing. OEs registered in NI are not entitled to a postal vote. A postal vote arrangement made pre-PPVR commencement (31 October 2023) will expire at the same time as OE’s declaration expires, so that these dates align. Transitional arrangements will be put in place for OEs who apply for an absent vote between the commencement of Online Absent Vote/Postal and Proxy Vote Restrictions (OAVA/PPVR) measures (31 October 2023) and OEs measures (16 January 2024). If an OE applied for a postal vote in the above period, their entitlement can only be granted until the OE’s existing 12-month registration expires. This is set out in the PPVR secondary legislation. If an OE applies to register for a postal vote after OEs commencement and before they are on the new 3-year renewal cycle, it will only be granted until their current declaration entitlement ends. This is also in the PPVR secondary legislation.

**e. Absent vote arrangements: proxy votes:**

For OEs who hold a proxy vote arrangement pre-PPVR measures commencing, that shall be cancelled on 31 January 2024. If an OE were to apply for a proxy vote after the 31 January 2024, it would require a signature refresh at the same time as their existing OE’s declaration expires (they could be a pre-OEs commencement declarant tied to the current 12-month cycle, or a post-OEs commencement declarant on the new three-year cycle). It should be noted that any OE who applies for a proxy vote after the commencement of PPVR measures, will not have their arrangement cancelled on 31 January 2024. An automatic signature waiver will be applied to OEs who are still on the 12-month declaration cycle and apply for a proxy vote fewer than 3 months before their OE declaration is due to expire. For example, if an OE applied for a proxy vote in December 2023 and their signature refresh was due in February 2024, then a waiver could be granted. In this scenario, so long as the OE renewed their declaration, the signature refresh for their proxy arrangement would be due in November 2026 (at the same time as their declaration would be due for renewal). NI registrants are entitled to a proxy vote by virtue of their status as OEs and as a consequence their absent voting arrangement will not need to be renewed for as long as there is no break in the individual’s overseas registration.



18. UK Government will update the existing digital system to facilitate online applications being sent to EROs from electors who wish to register in a GB constituency and support the processing of these applications. As part of identity checks, the digital system will carry out data matching between information provided by the applicant and records held by the Department for Work and Pensions (DWP). The results of this process will be shared with EROs. For NI, which cannot yet link to the digital registration system for OEs, applications will be checked against DWP data provided to, and held by, the Electoral Office for NI (EONI).
19. EROs and ROs will be responsible for the operation of the new measures. Training will be provided to Local Authorities on the use of the digital service and any additional training needs will be funded via New Burdens funding. Adaptions to existing NI systems and EONI staff training will be funded via a Memorandum of Understanding between DLUHC and EONI.
20. The Electoral Commission issues guidance to electoral administrators relating to the administration and conduct of elections, including absent voting. This guidance will be updated as necessary to reflect the changes being introduced.

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

***E.1 Monetised impacts***

***E.1.1 Methodology***

*Franchise and Registration Volumes Assumptions*

21. A systems dynamic model was built using United Nations migration data and Office for National Statistics (ONS) International Passenger Survey data to produce projections for the size of the future OE franchise. This estimates that the current size of the franchise is 0.9 to 1.1 million eligible British citizens living abroad, and will increase to 3.2 to 3.3 million.
22. The analysis outlined in this impact assessment applies the following assumptions evidenced by data from the ONS, National Records of Scotland (NRS), and DLUHC (including returns in relation to NI) to the franchise estimates to provide a projection for the volumes of OEs passing through various stages of the electoral registration and voting process:
  - a. Proportion of OEs making an application to register to vote:**
    - i. The percentage of the franchise registered during the years of expected UK Parliamentary elections (2024 and 2028) will be similar to the average those recorded across 2017 and 2019 at 19%.
    - ii. Across Great Britain, 92% of applications will be made online. This assumption is based on the percentage of OE applications made online, as reported in the responses of EROs from 199 LAs in a 2020 DLUHC survey. An exception applies to NI, where overseas electors will be unable to apply online, so 100% of applications are made on paper.
  - b. Proportion of OEs providing further evidence of their identity and/or connection to a qualifying address:**
    - i. 90% of all applicants apply on the basis of previous registration, and 10% on the basis of previous residence.
    - ii. 5% of previous residence applicants have left the UK before age 18.

- iii. EROs request additional documentary evidence from 15% of all applicants when confirming their identity and/or connection to qualifying address. Of these, 67% (10% of total applicants) will not be successfully registered via the documentary evidence process and will be asked to complete an attestation. Of these, 64% (6% of total applicants) will not be successfully registered as an OE.
- c. Proportion of OEs successfully registering:**
- i. 94% of applications result in a successful registration.
- d. Proportion of OEs who are sent a reminder to renew:**
- i. 66% of OEs are sent a reminder to renew each year their registration is set to expire, of which 43% do not renew. If the OE does not respond to a renewal reminder a second is sent by the ERO.
- e. Proportion of OEs making an absent vote application:**
- i. 71% of new applications will also apply for an absent vote, based on the portion of OEs currently holding absent voting arrangements.
- f. Proportion of OEs voting in person and by absent vote:**
- i. 29% of OEs do not have an absent vote arrangement in place.
  - ii. 43% of OEs have a postal vote in place.
  - iii. 19% of OEs have a proxy vote in place.
  - iv. 10% of OEs have a postal proxy in place.

#### *Unit Costs and Processing Time Assumptions*

23. Data collected from electoral registration teams within LAs is used to inform estimates of the time required to undertake processes at each stage of the OE journey. This data was collected via surveys in 2020 and 2022 with a sample size of 199 and 209, respectively. A cost for each registration and electoral process is then calculated based on the average hourly wage from the survey data, costs associated with contacting OEs using Notify pricing and voting costs based on the 2017 UK Parliamentary conduct costs (as the 2019 costs had not been fully settled at the time of modelling). In addition to the assumptions presented below, a supplementary communication provision is provided for Wales so that communications can be bilingual. The analysis applies the following assumptions:

- a. Stage 1 - Initial application to register
  - i. On average a register to vote application from an OE will take 5 minutes to process for an online application and 13 minutes for a paper application.
- b. Stage 2 - Verification of identity and connections to a qualifying address
  - i. It will take an ERO on average 48 minutes to verify an applicant's previous registration and 20 minutes to verify an applicant's previous residence. The previous registration check assumption considers the automated checks of digital registers as well as manual checks of physical registers.
  - ii. When further evidence is required, it will take an ERO between 8 and 12 minutes to request and process documentary evidence via email and by post respectively, and 9 and 13 minutes to request and process an attestation via email and by post respectively.
  - iii. The cost of printing and posting a documentary evidence request (two-page) letter is assumed to be £1.16 and an attestation request (three-page) letter is assumed to be £1.24. When information is instead requested via email, it is assumed there is no cost additional to an ERO's time.

- c. Stage 3 - Confirmation or rejection of registration
  - i. It will take an ERO on average 4 minutes to add an OE to the register and 7 minutes to explain their absent vote (AV) choice to them.
  - ii. The cost of printing and posting an outcome (two-page) letter is assumed to be £1.16. When the outcome is instead sent via email, it is assumed there is no additional cost above an ERO's time.
  
- d. Stage 4 - Renewal declaration
  - i. It will take an ERO on average 11 minutes to send via email and process a declaration to renew, 17 minutes to send via post and process a renewal and reminders and 3 minutes to remove an OE who does not respond from the register.
  - ii. The cost of printing and posting a renewal (two-page) letter is assumed to be £1.16. When the outcome is instead sent via email, it is assumed there is no additional cost above an ERO's time.
  
- e. Stage 5 - Absent vote applications
  - i. On average an ERO will take 6 minutes to process a postal vote application, 9 minutes to process a proxy vote application and 15 minutes to process a postal-proxy vote application.
  - ii. The cost of printing and posting an outcome (two-page) letter is assumed to be £1.16. When the outcome is instead sent via email, it is assumed there is no additional cost above the ERO's time.
  
- f. Stage 6 - In-person and proxy voting
  - i. Where newly enfranchised OEs choose to vote by proxy or in person at a polling station, there is likely to be a small additional burden on polling stations. The additional conduct cost per voter is £0.12.
  
- g. Stage 7 - Postal and postal-proxy voting
  - i. The additional conduct cost per postal and postal-proxy OE is £4.60. This covers the staff time of preparation, printing, postage, opening and verification of the postal votes of newly enfranchised OEs.

### **E.1.2 Direct monetised costs**

#### *Application to register*

- 24. Electoral services teams will face additional costs relating to processing of applications from newly enfranchised applicants, which includes the time taken to: take paper applications out of the envelopes, sort, scan and manually process form information (and where required chase up any missing information on incomplete application); and send applications for DWP verification and process the results of the DWP verifications. Manual checking of DWP data for these applicants by EONI will take additional time. The cost of processing this initial stage is calculated through the cost of staff multiplied by the average time taken to complete this stage. The assumption used is that on average a register to vote application from an OE will take 5 minutes for an online application and 13 minutes for a paper application.
  
- 25. Directly influencing this cost is the proportion of the franchise registering and the proportion of applications received online or via paper forms. The percentage of the franchise registered during the years of expected UK Parliamentary elections (2024 and 2028) is assumed to be similar to those recorded in 2017 and 2019 (around 19%). The analysis

assumes that 92% of applications will be made online, based on the percentage of Register to Vote applications currently made online. An exception applies to NI, as online applications are unavailable to OEs, so all applications are made on paper.

26. The additional cost of application to register of an OE as a result of this policy is estimated to be between **£2.4m and £4.0m, with a central estimate of £3.2m** (2023/24 prices, 10-year PV).

*Identity verification and connection to qualifying address*

27. Electoral services teams will face additional costs relating to the verification processes for applicants' identity and connection to a qualifying UK address. These include the time taken to: check historic electoral registers, consult locally-held data, check documentation provided upon application, and request and process documentary evidence (also called the exceptions process) and attestations where required. The cost of carrying out these processes is given by the cost of staff time multiplied by the processing time of each activity and calculated according to the assumed volume of applications at each stage. The assumptions used are: that 90% of all applications will be made on the basis of previous registration, and 10% on the basis of previous residence; that 5% of previous residence applicants will have last lived in the UK before the age of 18, in which case a register check will be carried out for their parent or guardian; and that 15% of applicants will be requested for documentary evidence to satisfy the identity and/or address verification requirements. An assumed proportion of 10% of all applicants will not be successfully registered via the documentary evidence process and will be asked to complete an attestation, and 6% of all applicants will ultimately not be successful in registering as an OE. The analysis assumes that it will take an ERO on average 48 and 20 minutes to verify an applicant's previous registration and residence respectively, 8 and 12 minutes to request and process documentary evidence, respectively via email and by post, and 9 and 13 minutes to request and process an attestation, respectively via email and by post.
28. Also arising will be the costs of printing and issuing correspondence between EROs and applicants. The assumptions used are that printing and posting an exceptions request (two-page) letter will cost £1.16 and an attestations request (three-page) letter will cost £1.24. When information is instead requested via email, there is assumed to be no cost additional to the ERO's time.
29. The additional cost of identity and address verification for OEs as a result of this policy is estimated to be between **£17.6m and £29.3m, with a central estimate of £23.5m** (2023/24 prices, 10-year PV).

*Application outcomes*

30. Electoral services teams must confirm in writing to all applicants the outcome of their application, whether successful or unsuccessful. In the latter case, they must also inform the applicant of the reason(s) why. Additional costs relating to these activities will be incurred due to the newly enfranchised applicants.
31. The modelling includes a provision for the ERO time to produce letters confirming the outcome of an individual's application, and the printing and issuing costs of the correspondence sent confirming the application outcome. It is assumed that 94% of all OE applications will result in a successful registration, that it will take an ERO on average 4 minutes to add an OE to the register, 7 minutes to explain their absent voting choice to them and that the electoral team member undertaking the work would be paid (incl. overheads) £18.10 an hour. The cost of printing and posting an outcome (two-page) letter

is assumed to be £1.16. When the outcome is instead sent via email, there is assumed to be no cost additional to the ERO's time.

32. The additional cost of application outcomes for OEs as a result of this policy is estimated to be between **£3.8m and £6.4m, with a central estimate of £5.1m** (2023/24 prices, 10-year PV).

#### *Renewals process*

33. Electoral services teams will face additional costs relating to registration renewals. These costs will arise from the additional number of renewals due to the expanded franchise, and the reduction in renewals in the first two years following the policy implementation due to the move from a 12-month to a three-year renewals cycle. The costs are associated with the ERO time to produce renewal reminders, process those that are returned, remove OEs from the register who do not respond to the renewal reminder, as well as the printing and issuing costs of the renewal reminders.
34. The assumption used is that 66% of OEs will be sent a renewal request each year and that 43% of those OEs will not renew. It is assumed that it will take an ERO on average 11 minutes to send via email and process a renewal reminder, 17 minutes to send via post and process a renewal reminder, 3 minutes to remove from the register an OE who does not respond and that the electoral team member undertaking the work would be paid (incl. overheads) £18.10 an hour. The cost of printing and posting a renewal (two-page) letter is assumed to be £1.16. When the correspondence is instead sent via email, there is assumed to be no additional cost to the ERO's time.
35. The additional cost of the renewals process for OEs as a result of this policy is estimated to be between **£2.5m and £4.2m, with a central estimate of £3.4m** (2023/24 prices, 10-year PV).

#### *Absent vote applications*

36. Electoral services teams will face additional costs relating to absent vote applications of the expanded franchise. These costs are associated with: the ERO time to process absent vote applications (including date-stamping upon receipt, checking that the applicant is or will be registered, carrying out additional identity verification checks in cases where the applicant's identity was verified by local data matching when registering as an OE, updating absent voting records and informing the applicant of the outcome of their application), and the printing and issuing costs of correspondence sent confirming the outcome of an individual's application.
37. The assumption used, which is based on the historic proportion of OEs holding absent voting arrangements, is that 71% of new OE applications will also apply for an absent vote. It is assumed that on average an ERO will take 6 minutes to process a postal vote application, 9 minutes to process a proxy vote application and 15 minutes to process a postal-proxy vote application.
38. The cost of printing and posting an outcome (two-page) letter is assumed to be £1.16. When the outcome is instead sent via email, there is assumed to be no cost additional to the ERO's time.
39. The additional cost of absent vote applications for OEs as a result of this policy is estimated to be between **£2.1m and £3.5m, with a central estimate of £2.8m** (2023/24 prices, 10-year PV).

### *Voting in national elections*

40. ROs will face additional conduct costs at UK parliamentary elections due to the expanded overseas franchise. These costs will arise from the small additional burden on polling stations when OEs choose to vote in person or by proxy, as well as the staff time of preparation, printing, postage, opening and verification of postal votes associated with the expanded franchise.
41. The assumption used is that 29% of OEs do not have an absent voting arrangement in place, 43% of OEs have a postal vote arrangement, 19% have a proxy vote arrangement, and 10% have a postal-proxy arrangement. It is assumed that the additional conduct cost is £0.12 per in-person or proxy OE vote, and £4.60 per postal or postal-proxy OE vote.
42. The additional conduct cost of voting in UK parliamentary elections for OEs as a result of this policy is estimated to be between **£2.1m and £3.4m, with a central estimate of £2.7m** (2023/24 prices, 10-year PV).

### *Training costs*

43. Funding will be provided to local authorities' electoral services teams and EONI 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.
44. The total additional cost for training as a result of this policy is estimated to be between **£0.1m and £0.2m, with a central estimate of £0.2m** (2023/24 prices, 10-year PV).

### *By-elections*

45. By-elections occur when an elected office is vacated prior to an 'ordinary' scheduled or general election. OEs are only eligible to vote in parliamentary by-elections of which there are very few and as such the cost is deemed to be negligible and not included in the modelling.

#### ***E.1.3 Indirect monetised costs***

46. There are no indirect monetised costs associated with this policy.

#### ***E.1.4 Direct monetised benefits***

47. There are no direct monetised benefits associated with this policy.

#### ***E.1.5 Indirect monetised benefits***

48. There are no indirect monetised benefits associated with this policy.

#### ***E.1.6 Summary***

49. Table 1 summarises the total cost of OE, which is estimated to be between **£30.6m and £51.1m with a central estimate of £40.8m** (23/24 prices, 10-year PV). The net present social value (NPSV) is also presented.

**Table 1. Summary of OE cost and NPSV**

<b>Cost line</b>	<b>Lower</b>	<b>Central</b>	<b>Upper</b>
Application to register	£2.4m	£3.2m	£4.0m
Identity and address verification	£17.6m	£23.5m	£29.3m
Application outcome	£3.8m	£5.1m	£6.4m
Renewals process	£2.5m	£3.4m	£4.2m
Absent vote application	£2.1m	£2.8m	£3.5m
Voting	£2.1m	£2.7m	£3.4m
Training	£0.1m	£0.2m	£0.2m
<b>Total cost</b>	£30.6m	£40.8m	£51.1m
<b>NPSV</b>	-£30.6m	£-40.8m	-£51.1m

Figures may not sum due to rounding.

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

### ***E.2.1 Direct non-monetised costs***

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

### ***E.2.2 Indirect non-monetised costs***

51. The Representation of the People Acts have sections containing offences which newly enfranchised OEs could commit while registering to vote, risking a cost to the justice system. However, it is expected that these costs would be minimal as there have been no convictions for these offences in the last 3 years.

### ***E.2.3 Direct non-monetised benefits***

#### *Greater participation in UK democracy*

52. The changes related to the OE policy feed into the wider objectives of the Elections Act, which will ensure the UK's elections are modern, fair, transparent and secure. Removing the 15-year limit on expatriates' right to vote in UK Parliamentary elections will enable participation from a larger number of OEs. The proposed changes are expected to expand the current franchise from approximately 0.9 to 1.1 million to 3.2 to 3.3 million British citizens living overseas in 2024. The model considers the scenario in which approximately 610,000 individuals will be registered as OEs at the time of the next UK Parliamentary general election. There may be secondary benefits from the expected increase in engagement and participation, including strengthening ties around the world with the expatriate community.

#### *Improved registration process for OEs*

53. The registration period for overseas electors will extend from one year to up to three years, meaning overseas electors will not have to reapply as often. Streamlined processes will allow overseas electors to reapply or refresh their absent vote arrangements at the same time as renewing their registration. NI overseas electors will not need to refresh their absent vote arrangement as it will remain valid for as long as there is no break in the elector's registration. The digitisation of the GB absent vote application process will make this process easier for overseas electors who typically vote by post or proxy and will be able to apply for their absent vote through an online service. This more efficient process will help to ensure that OEs are able to remain on the register for a longer period of time,

with a valid absent vote arrangement in place. These changes will therefore ensure that OEs are more likely to be able to participate in by-elections and any elections called at short notice.

#### *Improved registration process for EROs*

54. The digitisation of parts of the process (DWP checks and absent vote applications) are expected to improve the efficiency of processing individual applications within the registration process for EROs.

#### **E.2.4 Indirect non-monetised benefits**

##### *Increased use of postage and printing businesses*

55. Some stages in the application processes require communications to be sent via post, or alternatively, the ERO may choose to communicate via post. This cost passes on a benefit to the printing and postage firms contracted by the local authorities to produce this correspondence. This has not been quantified as the increase in profit for these businesses is not known.

#### **E.3 Sensitivity analysis**

56. The above analysis models the central scenario. There is inherent uncertainty with some of the underlying modelling assumptions and sensitivity analysis has been conducted to estimate an extreme lower and upper bound of the policy by varying multiple assumptions at once. Table 2 summarises the modelling assumptions under the low, central and high scenarios. The low and high scenarios are set at arbitrary levels in relation to the central scenario.

**Table 2. Sensitivity analysis**

<b>Assumption</b>		<b>Low</b>	<b>Central</b>	<b>High</b>
Proportion of applications made under previous registration condition		85%	90%	95%
The time taken to check 1 year of digital register (mins)		2.5	3.9	5.1
The time taken to check 1 year of paper register (mins)		7.5	11.5	15.0
The time taken to carry out previous residence checks, before exceptions/attestations (mins)		15	20	45
Voting method	Postal	30%	43%	60%
	Proxy	45%	19%	30%
	Postal-proxy	5%	10%	5%
	In-person	20%	29%	5%
Proportion of estimated franchise size		90%	100%	110%
<b>NPSV</b>		<b>-£29.0m</b>	<b>-£40.8m</b>	<b>-£55.3m</b>

##### **E.3.1 Low-cost scenario**

57. In this scenario, the assumptions take the values listed under the low scenario in Table 2 and **the estimated total cost is £29.0m, thus leading to a low NPSV of -£29.0m** (2023/24 prices, 10-year PV).



### ***E.3.2 High-cost scenario***

58. In this scenario, the assumptions take the values listed under the high scenario in Table 2 and **the estimated total cost is £55.3m, thus leading to a high NPSV of -£55.3m** (2023/24 prices, 10-year PV).

### **F. Impact on businesses, trade and investments**

59. 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, print and postage companies) may benefit from increased profit as a result of the introduction of this policy, it is not possible to quantify this due to a lack of available information around the profit margin of the businesses involved and is therefore excluded from the BNPV. Furthermore, additional revenue from postal and production takes place via local authorities and thus is deemed indirect. It is therefore excluded as a business impact.

60. There are no impacts for trade since this domestic policy affects the electoral system rather than businesses. There are no direct impacts for investment.

### **G. Risks and assumptions**

#### *Uncertainty around franchise size*

61. There is uncertainty in the size of the expanded franchise resulting from the new policy, due to the fact that Government holds no data on British citizens who have expatriated to other countries, and that the franchise expansion includes people who will have not lived in the UK for over 15 years.

#### *Proportion of applications made on the basis of previous registration*

62. A proportion of applicants who apply to be an OE do so on the basis of having previously been registered to vote in the UK. The remaining proportion of applicants apply on the basis of having been previously resident in the UK, but never registered. Given that no data exists to suggest the actual value, the baseline value of 90% for this assumption is a policy estimate and carries much uncertainty.

#### *Time to carry out register check*

63. The time taken to carry out register checks in the model is governed by two assumptions, concerning the time taken to carry out checks of one year of the electoral register, for digital and paper registers respectively. These assumptions are applied in the model with respect to applications made on the previous registration basis, as well as applications made on the previous residence basis who last lived in the UK before age 18. In the latter case, the model assumes that a register check will take place for the applicant's parent or guardian at the time of the applicant's last residence.

64. The central assumptions used in the model were taken from a DLUHC survey to EROs in 2020. In combination with other modelling assumptions on the number of registers checked per application, these result in an assumed time of 48 minutes spent checking registers per application. Advice received by DLUHC policy staff suggests that these timings may not be an accurate representation of the situation after commencement of the OE policy changes. It was indicated that EROs may have the capability to search digital registers covering multiple years simultaneously, rather than having to conduct a separate search for each year. The time taken to check paper registers is also subject to significant

variability, as it is dependent on the accessibility and archive quality of historic physical records. This is likely to particularly affect older registers.

#### *Time to carry out previous residence check*

65. This modelling assumption concerns the average time taken to carry out the checks to verify the qualifying previous residential address of someone applying as an OE on the basis of previous residence, rather than previous registration. It does not include the exceptions (requesting and processing documentary evidence) and attestations processes, which are covered by separate assumptions in the model.
66. Given that previous residence is a new eligibility pathway for OE registrations, there is no evidence on which to base the central assumption value. The central assumption used in the model is a DLUHC estimate, with a value of 20 minutes per previous residence application. The assumption is variable in that it encompasses three possible types of check — the automated DWP database check, local data matching, and any documentary evidence that was submitted upon application — any one or combination of which can be carried out by EROs to verify the qualifying address.

#### *Proportion of absent vote arrangement*

67. The model uses assumptions on the proportions of registered OEs who apply for each of the absent voting methods and who vote in person. Given that OEs can only vote in Parliamentary elections, the absent voting arrangements in place at a given time are strongly linked to the proximity in time to the occurrence (or not) of a general election. The central assumption values used in the model are based on data from a 2022 survey to EROs conducted by DLUHC. The survey was carried out over two years after the most recent general election at the time in December 2019. Therefore, the absent voting proportions in the survey may not be representative of OE behaviour around the time of a general election.

### **H. Wider impacts (consider the impacts of your proposals)**

68. Under the Equality Act 2010, Section 149 (1), there is a duty to consider the potential impact upon groups with protected characteristics of any legislation we introduce, including any mitigations that may be required. An Equality Impact Assessment was published upon introduction of the Elections Act 2022 which covers the OE measure, and equality impacts have continued to be considered appropriately throughout the development of the secondary legislation. The measures contained in this statutory instrument aim to have a positive impact for all groups by making it easier for British citizens living overseas to participate in Parliamentary elections and improve their current experience. It is therefore concluded that the SI will introduce changes to OEs which will have a net positive impact on protected characteristic groups.
69. For NI an impact assessment screening has been conducted under section 75 of the Northern Ireland Act 1998 which covers the impact of proxy OE measures, and the assessment is that the measures do not negatively impact on section 75 categories.
70. The proposals apply to any British citizen registering to vote while living overseas. However, it should be noted, as a general point, that certain pieces of permissible documentary evidence may reveal certain protected characteristics. For example, marriage certificates, pension statements, or benefits statements submitted as documentary evidence for address or identity verification may reveal protected characteristics about the applicant. These are necessary steps to counter fraudulent applications and would all be supplied voluntarily by the applicant. The information will be used by the ERO only to verify an applicant's identity and to link them to an address.

71. The equalities impact of the OE changes has been considered for all protected characteristics, with age and disability being identified as protected characteristics on which the policy changes may have an indirect, adverse impact. Some applicants - those who were last registered more than 15 years ago, or who have never been registered - will have their connection to a UK address verified by certain forms of documentary evidence. This could indirectly impact voters on the basis of age, for example, an applicant who left the UK as a child may not have proof of residence in their own name. Further, an applicant with a disability may struggle to produce or interpret certain types of documentary evidence they are required to provide.
72. While there will be some administrative burdens on those who may find it harder to provide evidence of previous residence in order to register, the process for verifying identity and previous address will make registration as secure as possible, including for those who are more susceptible to practices of electoral fraud, which have historically affected in particular those with protected characteristics.
73. A full assessment of the impact upon groups with protected characteristics is contained in an updated Equality Impact Assessment for this policy, which includes steps to mitigate the potential adverse impacts identified.

## **I. Monitoring and Evaluation**

### ***I.1 Monitoring***

74. A range of monitoring data will be collected to assess the impact of this policy measure on OEs. This will include monitoring the volume of applications made under the previous registration and previous residence conditions, and the volumes of applications that are rejected at each stage of the new identification verification process, alongside estimates of the total number of absent vote applications made by OEs. Monitoring data will also be collected to assess how the policy measures affected administration and processing of OEs' applications by electoral administrators.

### ***I.2 Evaluation***

75. In addition to the monitoring data outlined above, the wider evaluation of the Electoral Integrity Programme will collect a range of data to assess the impact of the policy measure on voters and Local Authority electoral teams and administrators who will be responsible for its implementation. IPSOS's public opinion survey and qualitative research with the elector sector and/or OEs will be used to gather evidence on their experience of voting and investigate wider impacts on attitudes to the electoral system and voting behaviour. Similarly, a survey of electoral teams in Local Authorities and complementary qualitative research with Electoral Administrators will be carried out to gather evidence on how the measure is being delivered and their impact on the sector.
76. The research and analysis carried out for the evaluation will be synthesised by an external research agency and published in a report following the next UK General Election