Improving Voter Registration:

A GUIDE TO INTRODUCING AUTOMATIC VOTER REGISTRATION

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Electoral Integrity Project

Joseph Rowntree Reform Trust

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The Electoral Integrity Project produces innovative and policy-relevant research comparing elections worldwide. The project is currently directed by Dr. Holly Ann Garnett and Professor Toby S. James, and is housed at the Royal Military College of Canada/Queen's University, and the University of East Anglia. It was founded in 2012 by Professor Pippa Norris and originally based at Harvard University and the University of Sydney.

SUMMARY

Voter registration is crucial for ensuring that citizens can smoothly cast their vote on an election day. It is already compulsory to register to vote in the UK, but millions of people are missing from the electoral rolls – and are therefore unable to vote on the day of an election.

Taking part in our elections by voting is an essential step in democratic and civic inclusion. The Government noted in their manifesto that, "To encourage participation in our democracy, Labour will improve voter registration". The government's blueprint for modern digital government also sets out a vision to improve public services through the use of technology and improved data.

Automatic Voter Registration (AVR) is the technological, data-led solution, that the Government can introduce to address democratic inequality and create a system fit for the 21st century. AVR would involve giving electoral registration officers (EROs) the power to register electors when they have reliable and accurate information about them – without citizens having to act. A fully Automatic Voter Registration system would be the most effective way of improving the completeness of the electoral register.

Assisted Voter Registration, which involves prompting citizens to register when accessing other government services, should be used to supplement AVR to ensure the registers are up to date and amended when required.

At the same time, steps should be undertaken to create a single centralised electoral register to maximise the benefits of data for political equality, government efficiency and public service.

AVR is a sensible, technical solution to a long-term problem in our democracy. Evidence from democracies around the world – where automated registration is the norm – show that it is effective at improving the accuracy and completeness of the register, and that it is cost effective (costs and savings are explored further below). AVR also has the benefit of being popular – YouGov polling shows that 81% of people support it. This report explains what Automatic Voter Registration and Assisted Voter Registration are and provides a roadmap for implementation.

KEY RECOMMENDATIONS

The Government should adopt a two-track system of reform. To make immediate improvements to the electoral register, including during the enfranchisement of 16- and 17-year-olds.

Track One involves:

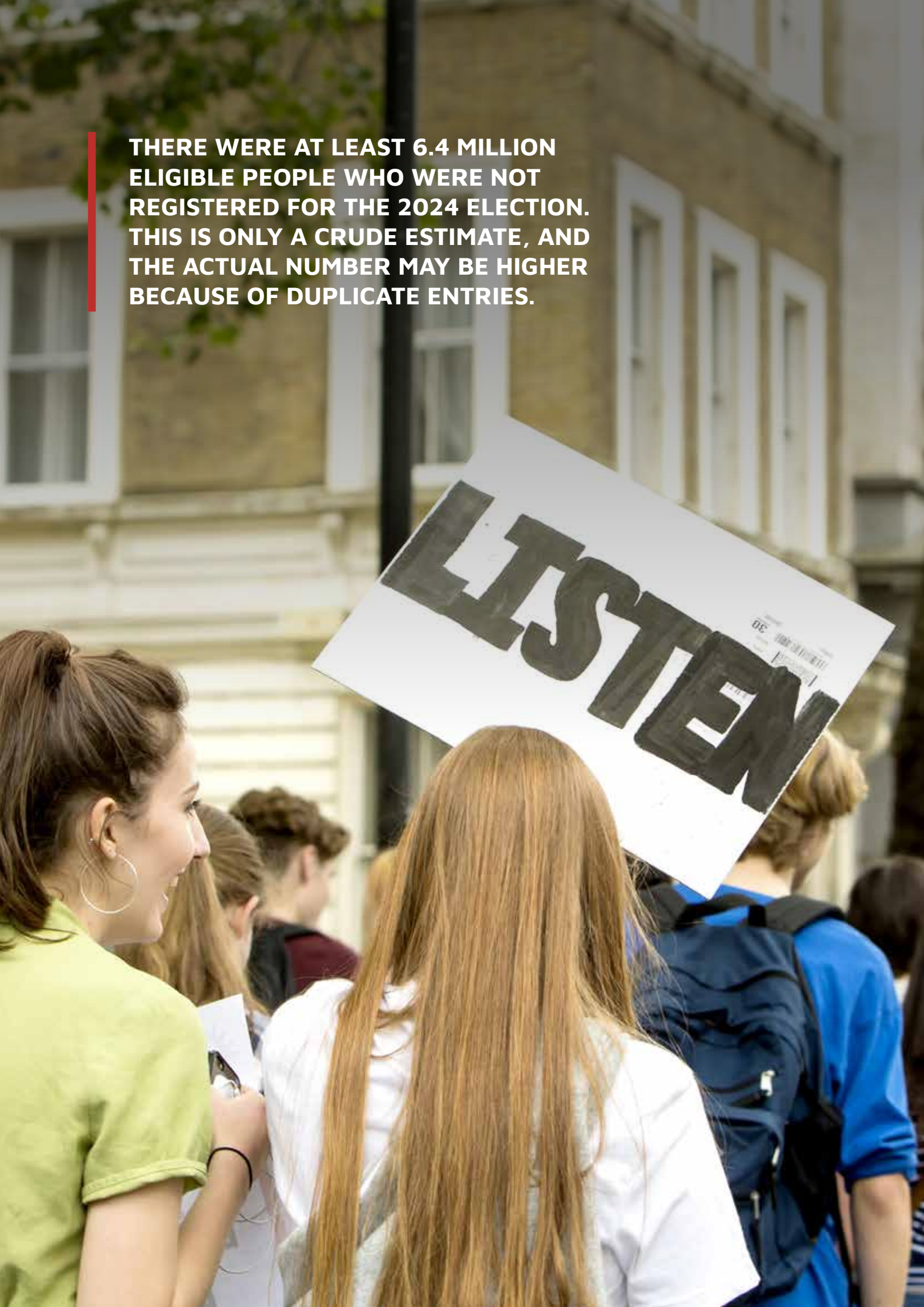
- UK-wide legislation being proposed to Parliament in 2025 which would empower EROs to register people without application, where EROs are satisfied that the person is eligible.
- EROs being given access to datasets, such as the DWP's Customer Information System (CIS) for AVR, and public agencies should be required to provide assisted registration options.
- Newly enfranchised citizens being automatically registered as they become eligible for the first time. This will be an essential step in making the Government's commitment to Votes at 16 a success.
- The Open Register (described below) being abolished. This would enhance voters' privacy and reduce security risks.

Track Two should involve:

- The Government moving to implement a central register, effectively re-introducing the Co-ordinated Online Record of Electors (CORE) which was originally established in 2006.
- Options being piloted UK wide (using UK-wide datasets).
- The Government developing a "look-up tool" so voters can check if they are already on the register, removing the pressure on EROs.

AUTOMATIC VOTER REGISTRATION (AVR) IS THE TECHNOLOGICAL, DATA-LED SOLUTION, THAT THE GOVERNMENT CAN INTRODUCE TO ADDRESS DEMOCRATIC INEQUALITY AND CREATE A SYSTEM FIT FOR THE 21ST CENTURY.

THERE WERE AT LEAST 6.4 MILLION ELIGIBLE PEOPLE WHO WERE NOT REGISTERED FOR THE 2024 ELECTION. THIS IS ONLY A CRUDE ESTIMATE, AND THE ACTUAL NUMBER MAY BE HIGHER BECAUSE OF DUPLICATE ENTRIES.



The problem:
THE CURRENT REGISTRATION PROCESS DOES NOT WORK FOR MILLIONS OF PEOPLE

Turnout at general elections is in long term decline. At the 2024 general election, only 52.8% of the population over 18 (rather than registered voters) cast a ballot – a figure which has been declining at an alarming rate over the long term (Figure 1).

The IPPR argue that this "has led to a widely felt but unequally spread sense that democracy-as-usual is not working".

A key part of the problem is that people are increasingly not even registered to vote. Figure 2 shows an estimate of the number of people who were not registered on election day in the period 1945-2024 based on subtracting the registered electorate at general elections from the International IDEA data on the voting age population estimate.[1] There were at least 6.4 million eligible people who were not registered for the 2024 election. This is only a crude estimate, and the actual number may be higher because of duplicate entries.

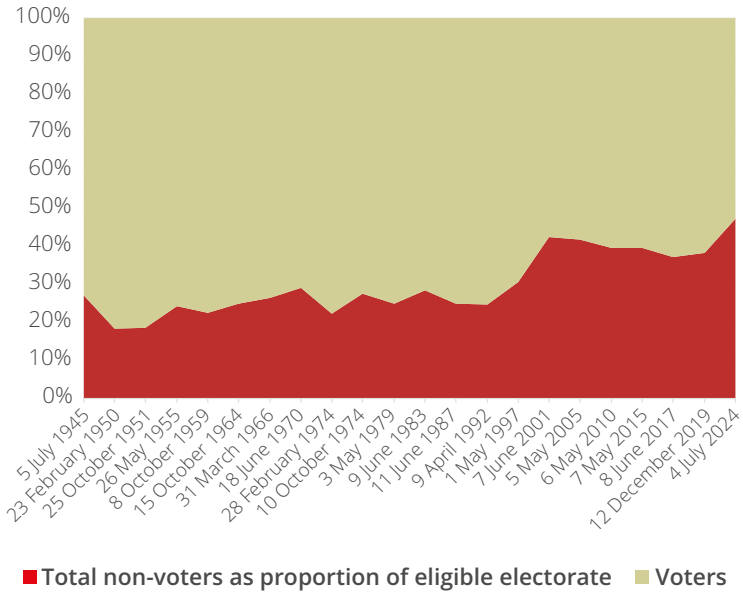


Figure 1: *Turnout at UK general elections, 1945-2024*

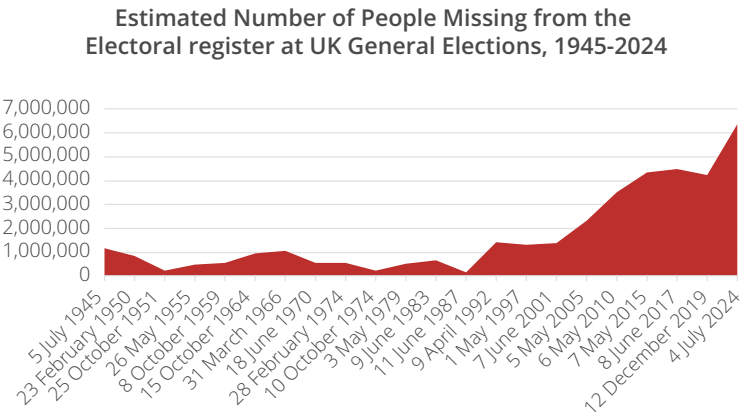


Figure 2: *Estimated number of people missing from the electoral register at UK general elections, 1945-2024. Source: author based on data on voting age population and registered parliamentary electorate from* International IDEA.

1 This is calculated as the voting age population (eligible electorate) minus the number of registered voters.

Evidence of registration as a barrier to voting comes in many forms. Surveys from poll workers show that people commonly arrive at polling stations but are turned away because they are missing from the electoral register. Figure 3 summarises data responses from over 18,000 poll workers at the 2024 general election about the number of people who asked to vote who were not on the electoral register and who were therefore not able to. Four in five poll workers experienced at least one case – with some areas experiencing large numbers of people being turned away at the polls.

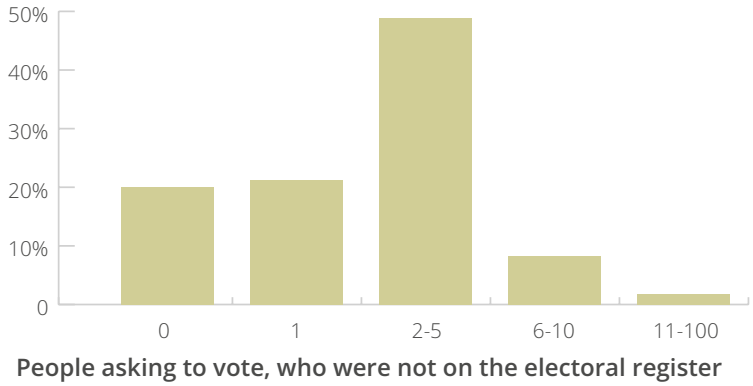


Figure 3: *Number of people that each poll worker encountered asking to vote, who were not on the electoral register.*

Those missing from the register are not evenly distributed across the population, as Figure 4 illustrates. The registration rates of young people were chronically low ahead of the general election in 2024, with numbers reported in 2023 by the Electoral Commission at only 16% for 16- and 17-year-olds and 60% for 18- and 19-year-olds. Registration rates are also lower for some ethnic groups (notably Black), nationalities (EU and Commonwealth), private renters, lower socio-economic groups and those living in London. These are long-term trends, and for some communities the registration gap is getting worse – for the Black community, registration rates dropped between 2018 and 2022 from 75% to 72%, demonstrated by Electoral Commission data.

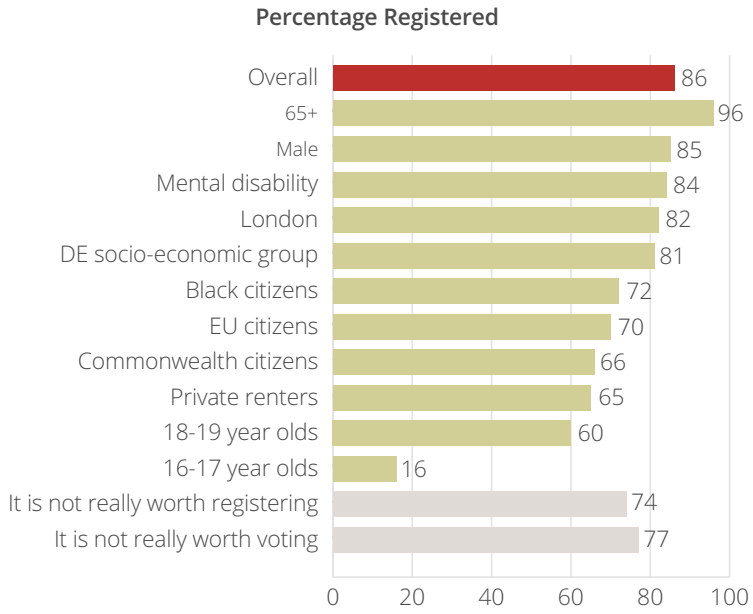


Figure 4*: Electoral Registration completeness in Great Britain in 2022, by select socio-democratic groups. Source: author based on data provided by the* ***Electoral Commission****.*

As non-voters are predominantly young, from minoritised and racialised ethnicities, born overseas, rent their homes or live on low incomes, this registration and voting gap contributes to political inequality: these communities have less influence on the decisions made by Government. Research by Professor Maria Sobolewska and Dr Andrew Barclay suggests that for minoritised ethnicity voters, registration is the main challenge for democratic participation, as, "once non-White ethnic minority voters are registered, the turnout gaps are smaller".

For those who rent their homes privately the challenge of manual registration each time they move is clear. Electoral Commission data shows that those who have lived in their home for less than a year are registered at only 39%, compared to 95% for those who have lived in their home for 16 years or more.

The former Levelling Up, Housing and Communities Select Committee Chair Clive Betts MP, after the committee inquiry into the electoral registration system, said, "It is a major and fundamental defect in our democratic system that many millions of UK citizens face being unable to make their voice heard at election time."

In 2019, the then Minister for the Constitution, Chloe Smith MP, set out in her preface to the Cabinet Office's report into Democratic Engagement in January 2019:

THE REGISTRATION RATES OF YOUNG PEOPLE WERE CHRONICALLY LOW AHEAD OF THE GENERAL ELECTION IN 2024.

The register matters beyond participation

An accurate and complete electoral register is vital to enable citizens to be able to vote, but it also has further wider societal importance. The register is used by the courts to draw jurors. It is used by a number of government agencies such as the Office for National Statistics to enable planning, making it an essential tool for good government. Voter registration is also important for individuals, because it can help their credit rating.

Furthermore, the UK Parliamentary Boundaries are drawn using the electoral register. Low voter registration rates in parts of the country, such as London, means that some areas get less political representation.

The Electoral Commission has said that there is little evidence that the accuracy and completeness of the register is likely to significantly improve without major changes to the system. Automatic Voter Registration is the most effective solution to this problem.

INTERNATIONAL EVIDENCE SHOWS THAT AUTOMATIC VOTER REGISTRATION IS THE MOST EFFECTIVE WAY TO DEAL WITH THE CHALLENGE OF LOW REGISTRATION RATES.

The solution:

AUTOMATIC VOTER REGISTRATION IS THE MOST EFFECTIVE SOLUTION TO THIS PROBLEM

Automatic Voter Registration would enable the Electoral Registration Officer (through access to public datasets and legislation to give them permission) to enrol people without them having to make an application to register to vote. The ERO would then write to the potential voter to inform them that they had been added to the register, giving them the opportunity to make any corrections needed. They would have the power to do this if they were confident that they had accurate information about a person's eligibility. This could happen year-round, removing the huge pressure on electoral staff at the point of annual canvass, or when an election is called.

International evidence shows that Automatic Voter Registration is the most effective way to deal with the challenge of low registration rates. A data set such as the DWP's Customer Information System would enable millions of potential electors to be added to the register, likely including large numbers from under-registered demographics.

The ideal model of AVR would include the implementation of a centralised register, while retaining local control. The UK's existing model is based on a Victorian structure of local registers held by Local Authorities. A single centralised register would enable EROs to more readily check for duplicate electors in the register. EROs would also be more efficiently and securely able to transfer data to other EROs for the purposes of electoral events, rather than exporting data through locally held files. EROs' local knowledge would be essential for maintaining the register – the automated system enabling them to focus on outreach and turnout.

AVR would save enormous amounts of paperwork and time spent chasing and sending reminders to eligible people asking them to complete forms. Additionally, it is consistent with data protection legislation, as noted below.

Assisted registration could be brought in to support AVR

Assisted Voter Registration would mean that people are prompted to register to vote when interacting with other government services. Millions of transactions are undertaken each year in which people enter their personal details, for example, to apply for a passport. Assisted Voter Registration could involve adding a tick box to the end of the passport form asking citizens whether they would like this information to also be sent to the Electoral Registration Officer. It has previously been estimated that up to 6.5 million people per year could register when applying for a passport. Assisted Voter Registration could therefore be offered when citizens:

- Apply for a passport
- Register for council tax
- Update driving licence details
- Register at university
- Claim benefits
- Submit a Home Office immigration application

Information could then be shared with an ERO and treated as an application. Assisted Voter Registration is therefore a convenience measure for citizens, who may not otherwise register.

Assisted Voter Registration can support a fuller AVR system, but on its own will not be likely to solve the full scale of the registration challenge.

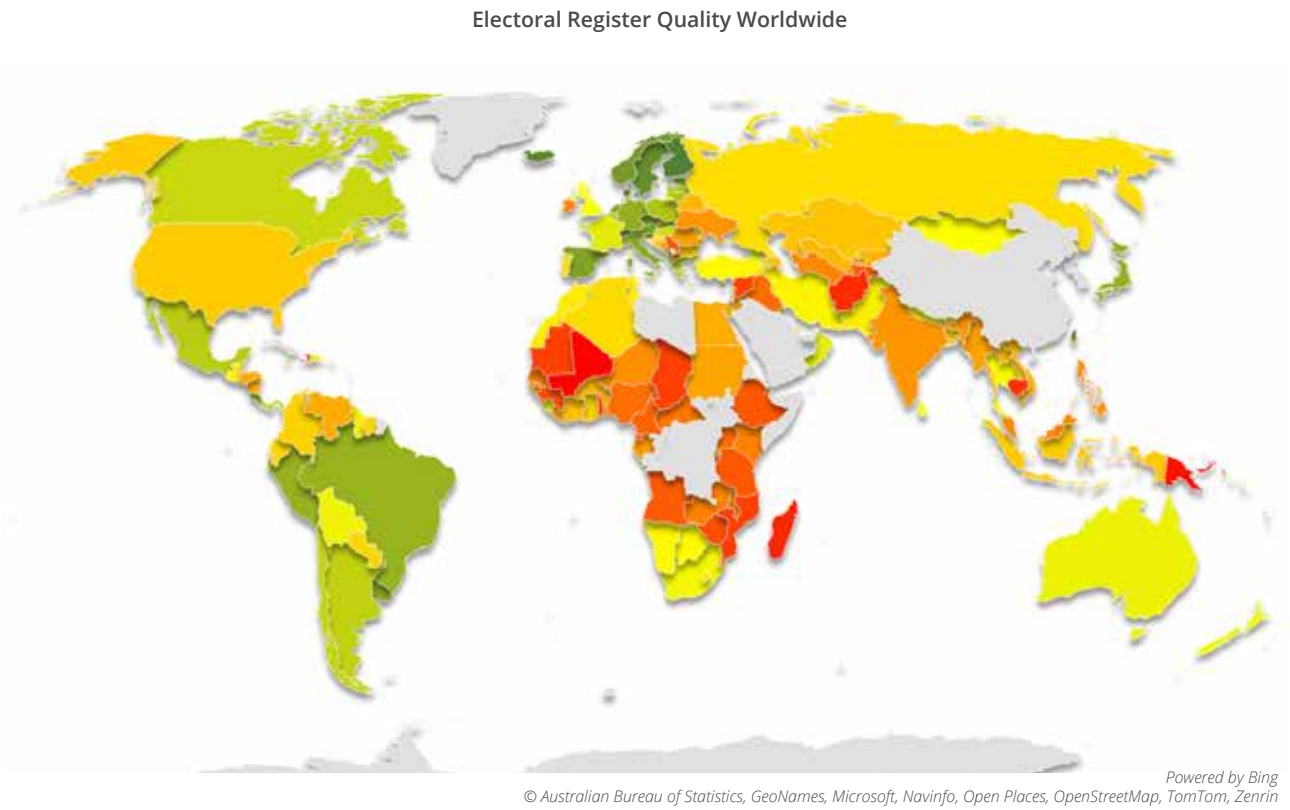


Figure 5: *Voter registration quality around the world 2012-22. Source: authors based on the Perceptions of Electoral Integrity Dataset 9.0.*

International examples show how effective AVR can be

An international study, which looked at 159 counties, shows that countries with AVR have both more accurate and more complete electoral registers than those that do not. This means that more potential voters are on the register, at the correct address, and with the correct information.

The highest scoring country for electoral register quality according to international indexes is Finland (Figure 5 and 6), which has AVR. The electoral register is compiled by the Digital and Population Data Services Agency using information from the Population Information System. These data are then publicly displayed, and each elector is sent a notice of their right to vote. Any elector who is not on the list may make an appeal before the election to have their name included. This model rests on the use of an existing population register and is managed by the agencies and departments involved in its administration.

Automatic registration is also in place in the other highest-ranking countries. Individuals who are entitled to vote in the local and regional elections will be included automatically in the electoral register in the municipality where they are listed in the national register in Denmark and Switzerland, for example.

There is a challenge in introducing AVR in a country without a civil population register, but the UK has a number of databases that could form the basis of a central database. There are a rich set of case studies available to draw lessons from. The US is a great example because there have been innovations over the past three decades.

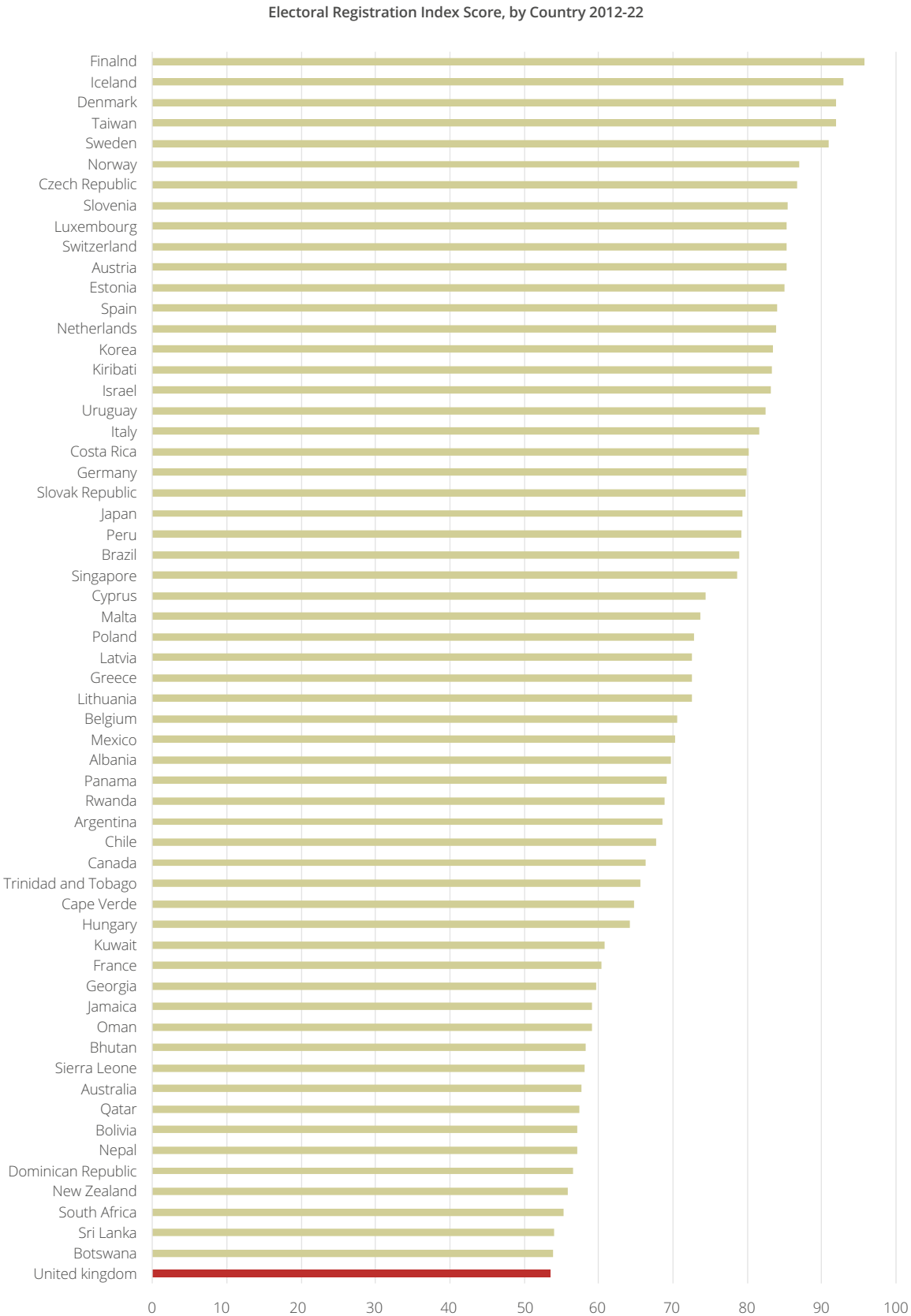


Figure 6: *International rankings of electoral register quality 2012-22. Source: authors using Electoral Integrity Project Data. Top ranked 61 countries out of 169 countries listed.*

There are a number of examples of assisted registration in the US

Assisted Voter Registration was introduced in the US in the 1990s under a law called the National Voter Registration Act. This required the Department for Motor Vehicle (DMV) agencies to offer voter registration – a form of Assisted Voter Registration, allowing voters to register to vote when they applied for their driving licence. Some states have gone further and introduced their own laws which enable Automatic Voter Registration using data from the DMV.

As a result of these reforms, the DMV became the central point of voter registration. As Figure 7 shows, over half of voter registration applications in the US in 2022 took place at other public agencies – rather than via the elections office. In comparison, figure 8 shows that in the UK nearly all applications come from individual online applications.

The success of assisted registration systems in the US varies by state and implementation model is important. However, it can radically change the flows of voter registration that take place. Automatically registering electors using data from the DMV increases its capability to boost registrations. States which had AVR policies registered 56% via DMV in 2022.

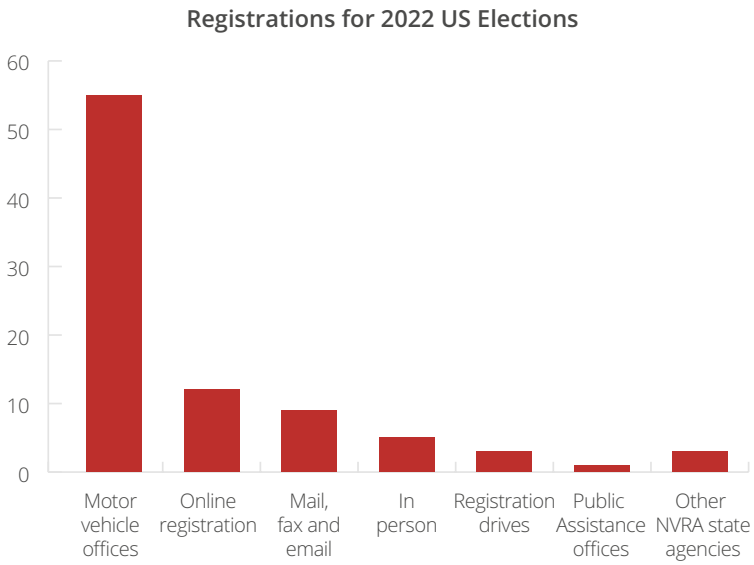


Figure 7: *Registration methods for 2022 US elections. Source: author based on data in the* ***Electoral Assistance Commission*** *p.144.*

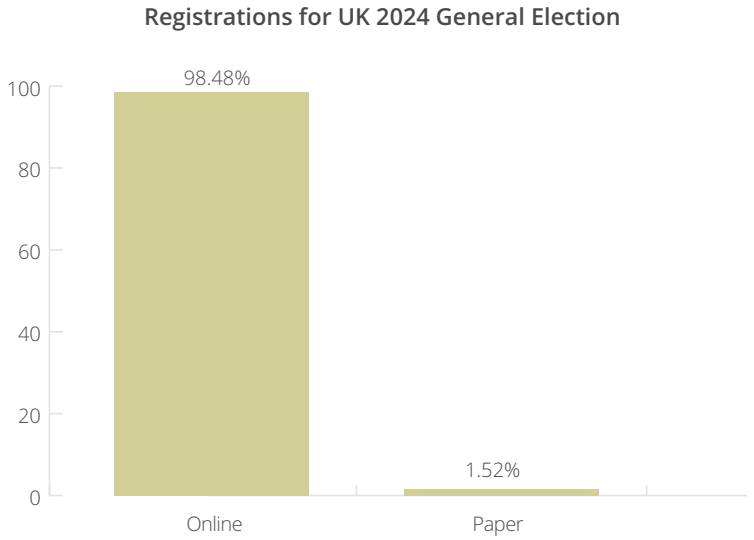


Figure 8: *Registration methods for 2024 UK general election. Source: author based on data in the* ***Register to Vote Dashboard****, for the three months ahead of the election.*

How could Automatic Voter Registration be implemented in the UK?

EROs already have access to data which is held locally (e.g. council tax and school admissions data) and this is currently used within the voter registration process for verifying applicants to the register.

EROs can use this data to maintain existing registrations and to remove people from the register – but not to add them. EROs need to invite people to register – even if they are already registered and paying council tax. This is a resource intensive process, usually requiring letters to be mailed to potential voters. While this process seems to be effective for some people (the latest data showing that people who own their own home with no mortgage are registered at 95%), it is less so for others (those who rent privately registered at only 65%).

EROs could therefore be given the powers to have access to an increased range of data sources (e.g. DWP CIS, DVLA records and school registrations). This could come in the form of the ability to search existing government datasets to locate people who are missing from the register.

How could assisted registration be implemented to support AVR?

Additionally, EROs could be given access to data created at the point at which it is updated by a person interacting with another government service (e.g. when registering their car, claiming a benefit) on the assumption that the data is most up to date at that moment in time. An opt out could be provided for the citizen if needed.

For soon-to-be-enfranchised 16-year-olds, this could work through the National Insurance Number database

The UK government has a manifesto pledge to lower the voting age to 16 for all elections. Voter registration is lowest for younger age groups and so franchise extension is unlikely to be a success unless accompanied by AVR. Rates have plummeted for attainers (those who will soon reach voting age) since the introduction of individual voter registration. Votes at 16 is therefore likely to lead to many people who should be able to vote – but who are not registered. This would lower the overall registration rate and also lead to many frustrated people in polling stations at the next general election. The immediate priority and 'easy win' is therefore to prioritise the immediate direct enrolment of 16-year-olds.

One proposal for reform would be to automatically register 16-year-olds when they receive their National Insurance Number ('NiNo'). This would be an example of the type of data EROs could be provided with, as part of legislation enabling AVR.

HM Revenue and Customs (HMRC) holds data about children if their parents have claimed child benefit or childcare support. A NiNo is created for each child and they are sent this number as the child approaches 16 years old. A recent innovation has been to make the young person aware that they can use this number to register to vote.

One barrier to automatically registering citizens at this stage is that, according to the Electoral Commission, the Treasury does not have information available on nationality. The young person's eligibility to vote in elections upon turning 16 cannot be known.

Nationality is held as a field in the DWP CIS database, however. A Freedom of Information request was made to the DWP to identify the volume of entries in which this field is populated. Figure 9 shows that nearly all entries contain a populated field. However, there is a rapid drop off for those born after 2019. Nonetheless, the data is complete for entries for those who will be becoming old enough to vote.

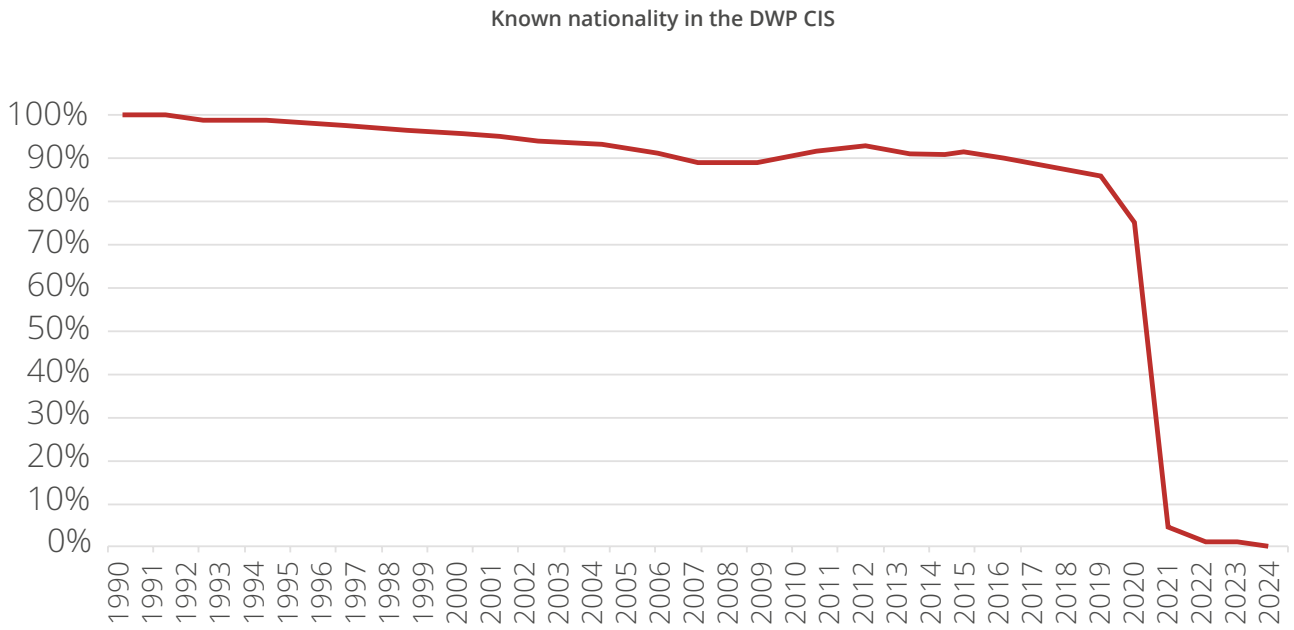


Figure 9: *Known nationality in the DWP CIS. Source: Author based on data on Freedom of Information Request FOI2024/64690.*

Providing both the Treasury and DWP CIS data to EROs may then empower them to automatically register 16-year-olds with minimal administrative effort and cost savings on voter outreach work.

The automatic enrolment of citizens at the age of 16 (or shortly before) would mean that having 'attainers' on the electoral register would be much less important. Safeguarding considerations would mean that 16- and 17-year-olds added to the register should certainly not be added to the Open Register.

Legislation will be required to enable EROs to register potential voters

Legislation is needed to give EROs the power to register someone without an application in the UK – as would be the case with AVR. Wales has already passed this – so there is legislative text which could be built upon. At present, EROs can remove electors, but not add new ones without an application. Legislation is therefore the central impediment to progress.

Legislation will also be required to ensure that EROs can receive the data that they need to register electors. Assisted Voter Registration might be implementable without legislation. However, legislation is encouraged as it could be used to require specific public agencies to support voter registration. This was key to success in the US.

The 2017 Higher Education and Research Act brought in the responsibility for universities "for facilitating cooperation between the provider and one or more electoral registration officers in England for the purpose of enabling the electoral registration of students who are on higher education courses provided by the provider." This was seen by some as an opportunity for the introduction of a form of assisted registration, data sharing between universities and local authorities.

However, research shows relatively shallow engagement from universities, with the most common activity being the university simply providing a link to the government registration website. Therefore, young people's registration rates remain low and a student's likelihood of being registered to vote depends on the institution they attend. Without legislation providing a simplified and systematic model for data sharing, this is unlikely to improve.

Legislation might also help with data protection, making the 'public task' basis for data processing clearer, and removing any doubt over consent.

A UK-wide pilot will enable smooth implementation and a system which works for marginalised communities

Piloting would help the most useful sources of data to be identified. EROs will need time to review

the data that they receive so pilots would enable the most efficient use of their time to be identified. Piloting would also enable any unforeseen effects on vulnerable groups to be identified and systems to be checked.

Although the Welsh Government is currently piloting Automatic Voter Registration models, they are only able to use local datasets. Therefore, the pilots will not serve as a full pilot of what wider UK legislation could offer.

Piloting could be undertaken to explore what works best to maximise inclusion, completeness and accuracy. Legislation is required to enable EROs to access necessary datasets to enable pilots.

Pilots could focus on evaluating:

- The percentage of electors who could be registered when they turn 16 with the use of the DWP CIS dataset and Treasury data (AVR).
- The number of electors that could be enrolled using local data sources such as council tax (AVR).
- The number of electors that could be enrolled using new passport applications, driving licence applications, university credit applications, university student enrolment data, child benefits applications and applications for disability benefit (assisted registration).
- How the use of various datasets impacts registration rates for under-registered demographics, comparing this against the accuracy and completion of the current register.

If AVR were more widely implemented, ongoing research would be needed to identify the most useful sources of data, since these may change over time. The implementation of a national electoral register ('CORE 2.0') may make some lessons redundant. However, continuous research and evaluation will be important.

How could a centralised register support effective implementation of AVR

The current system is very decentralised, with each ERO responsible for a separate electoral register for their Local Authority. There are therefore hundreds of local registers across the UK in need of separate maintenance. Introducing one single centralised registration system would make it easier for EROs to check for duplicate electors in the register. The system could contain one register for UK parliamentary elections; and one local government register for each of Scotland, Wales, England and Northern Ireland. Each register would be connected using a unique electoral identifier for each person. This would make it easier to develop a look-up tool to let potential voters know if they are already registered, and if so, where. When voters move home, EROs would be better able to securely notify other EROs.

Issues of database security would have to be well managed, and it may not be possible to implement a centralised register by the next general election. However, it can be considered as legislation for AVR is developed, and be introduced for future elections.

A project to implement such a centralised national dataset was legislated for in the Electoral Administration Act 2006, called the Co-ordinated Online Record of Electors ('CORE'). The project was dropped in 2011 by the Coalition Government to save money. However, the cost of the project (an estimated £11.4m to build and £2.7m per annum) are relatively small compared to potential savings.

CORE 1.0 was only initially envisaged as a system to allow political parties to assess the eligibility of their party donations. The savings would therefore have only been administrative savings to political parties. Local registers were to be retained. However, there was support for the system from the Electoral Commission who argued in their Voting for Change report that there "needs to be a national electronic register – albeit compiled locally". The Office for Democratic Institutions and Human Rights stated in their report on the UK's general election of 2005 that "a state-wide database for registered voters could be a useful tool to identify or prevent possible multiple registrations."

A project to introduce CORE 2.0 would enable the advantages of AVR to be maximised. There could be major savings through the use of a single Electoral Management System, economies of scale in staffing and more powerful tools for EROs to identify gaps in the register. CORE 2.0 would fit well into the Government's approach to digital infrastructure. In "A blueprint for modern digital government" the Government sets out plans for better use of digital technology to make people's lives easier, including by better joined-up public services which are able to share data within Government. They intend to "Establish a 'once only' rule, so that if people have provided information to one service, it can be reused by others with appropriate safeguards." This could be used to improve electoral registration, a vital point of connection between state and public, fit for our modern democracy.

Steps the Government can take:

IMPROVE THE REGISTRATION SYSTEM BEFORE THE NEXT GENERAL ELECTION

It is suggested that a two-track process is undertaken to maximise the advantages of AVR. Figure 10 maps out the proposed next steps.

The first track is to address immediate problems and facilitate the implementation of Votes at 16. Track One involves primary legislation from the UK Government to give EROs the power to enrol a citizen without application. Newly eligible electors could therefore be enrolled. This would also provide an important opportunity to make other revisions to the electoral registration process such as abolishing the Open Register. Box 1 lists key provisions which should be included in the Bill. The Bill will require adequate time for parliamentary scrutiny, consideration and approval so needs immediate drafting.

KEY PROVISIONS:

Key provisions for inclusion in a new UK Representation of the People Act 2025

- **Empower EROs to register citizens without application, where EROs are satisfied that the citizen is eligible. The Welsh model provides a template.**
- **Provide EROs with relevant national datasets for the purpose of voter registration including the DWP CIS and that from the Treasury to register newly enfranchised 16-year-olds automatically**
- **Enable various datasets to be piloted to determine those most useful to EROs for the purpose of AVR.**
- **Empower the Electoral Commission to set guidance for EROs based on the pilots.**
- **Require public agencies (as set out by the Minister through secondary legislation) such as the Passport agency to provide Assisted Voter Registration.**
- **Restore the independence of the Electoral Commission.**
- **Abolition of the Open Register**
- **Widen scope for anonymous registration**
- **Legislate for the development of CORE 2.0.**

The Bill would then facilitate lessons learned from the implementation of AVR in Wales (and possibly Scotland) to inform wider pilots across the UK. Scotland should pilot and implement AVR laws, as enabled by the Scottish Elections (Representation and Reform) Act. As the Scottish Government is responsible for Scottish registers, this would be necessary for UK-wide implementation of AVR. AVR and Assisted Voter Registration could be expanded to a wider range of groups in Wales.

Time for training, Electoral Management Systems changes and testing will be required. The enfranchisement of 16-year-olds could be the first moment at which AVR could deliver for UK democracy. The direct enrolment of young people would efficiently implement this major change to the franchise.

Track Two would involve the development of a national electoral register. The development of a national register could inform and reap the benefits of this process. Legislation will be required to enable CORE 2.0. There will also need to be ample time for consultation, training and testing.

The aim must be to then connect the two tracks to deliver a modern electoral registration system for a general election in 2028 or 2029. It would then be important to provide an opportunity for post-election evaluation.

TRACK ONE: AVR BEFORE THE GENERAL ELECTION

Immediate action in 2025
- UK government to propose legislation to enable EROs to register electors without application, data-sharing, the abolition of the Open Register and CORE 2.0 (see Box 1).
- Evaluation of pilots in Wales.
- Electoral Commission to produce implementation guidance for EROs.

Action for 2026
- Electoral management software changes.
- Development of training for electoral officials.
- Assisted voter registration at Passport Office and other public agencies.
- Evaluation of pilots in Scotland.

2027
- Automatic enrolment of all 16-year-olds onto the UK parliamentary register.
- Undertaking of UK wide automatic voter registration pilots to extend AVR to wider groups.
- Extension of automatic and assisted voter registration to other groups based on electoral pilots. For example, the use of local data sources such as Council tax.

2028/29 General Election
- General election undertaken under a new system with higher accuracy and completeness.

Post General Election
- Post-election evaluation and review.

TRACK TWO: A CENTRALISED REGISTER FOR SMOOTHER DELIVERY

Immediate action in 2025
- UK government to propose legislation to CORE 2.0.
- Development of beta GOV.UK App and GOV.UK Wallet.
- Wider work on digital identity.
- CORE 2.0 project design and mapping.

Action for 2026
- CORE 2.0 Consultation.
- Electoral management software changes.

2027
- System testing.
- Development of training for electoral officials.

2028/29 General Election
- Launch of integrated national register.
- General election undertaken under a new system with higher accuracy and completeness.

Post General Election
- Post election evaluation and review.

Figure 10: *A roadmap for improving voter registration in the UK*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FAQ on AVR and Assisted Voter Registration

1. Is the data good enough for AVR in the UK?
Although the UK does not have a central civil population register (a single datapoint for all citizens) there are a number of data sources which currently exist which could be used to enable AVR. These include:

- The DWP Customer Information System which is already used to check all new registration applications
- Local sources currently used for verification and removal of existing registrants

Wales is undertaking pilots to identify which datasets might be the most useful to EROs. Piloting and regular monitoring of the quality of data are therefore important aspects of implementing AVR. However, the Welsh Government is only able to pilot the use of data held in Wales, and are unable to access some of the larger data sources, such as the DWP database.

A centralised national register would maximise the advantages of AVR.

2. Where are the potential savings from AVR?
There is considerable potential for AVR to save money from the public purse. Rather than writing to people, inviting them to register, EROs could automatically add them where they are confident in the data. For example, if 16-year-olds are newly enfranchised at UK parliamentary elections, then there would be a cost of sending them an invitation-to-register letter. There are approximately 809,000 newly eligible electors each year, meaning the cost would be approximately £1,153,537 per annum to invite them to register.[2] Giving EROs the data and power to directly register them would negate this cost for the vast majority.

Evidence from overseas provides some indications that savings can be made – but are not always directly comparable. Delaware's State Election Commission in the US reported savings of $200,000 in the first year of operation, but the changes were not comparable because it also involved a move from paper to electronic applications and the UK already uses mostly electronic applications. A case study of Victoria in Australia (pp. 30-32) suggested that 10-15% of electors could be automatically enrolled. The Australian case suggests that there would be an outlay in costs, for example the New South Wales Electoral Commission required $1.2millionAUS, but that the 'reduced requirement to contact electors through the postal service' was a significant cost-saving'.

Additionally, money would be saved from the annual canvass because EROs could directly enrol people rather than send repeated reminders to people whose details are known via other sources (see above). The budgetary spend on electoral registration was £85.5million in 2010-11. Adjusting for inflation, this would be £123.6m in October 2024.[3] Of this, 19% was spent on canvassing – roughly £23.5m.

If there were savings of 10-15%, following the example of Victoria, then this could equate to £12.7m to £18.54m.

3. What are the potential costs for AVR?
The costs would include the time spent by electoral officials processing data that they receive. The Welsh government Financial Memorandum estimated that it may cost £15,028 per local authority, per annum. This would be £6,221,592 per annum for all local authorities across the UK.[4] The cost would fall on local authorities since they cover voter registration budgets.

[2] According to the ONS Labour market statistics there are 1,619,000 16-17 year olds in the UK. Halving this is 809,000. A letter sent second class would therefore be .85*809,500 = £688,075 per annum. Issuing a reminder would to 50%, asking them to register would be £344,037.50. Assuming that there would be no more reminders, the total would therefore be £1,153,537 per annum.
[3] Using https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator

Costs are dependent on how much data EROs are provided to process and the quality of that data. Piloting and ensuring that EROs are provided with high-quality data is therefore central. The development of better data sources – as a result of other government projects – may over time reduce costs substantially. These may be offset by the time saved through efficiencies generated by AVR.

There are also possible costs involved in making changes to the Electoral Management Software. A figure of around £1.6m was used for illustrative purposes only in Wales and Scotland to assess the potential costs.

For both AVR and Assisted Voter Registration there might be additional cost involved in adapting government websites and portals to exchange data. For example, enabling a citizen to register when submitting a passport application requires an adaptation to the Individual Electoral Registration Digital Service (IERDS) to receive the data – and send it onto the relevant ERO. Changes were made to the IERDS when the franchise was changed in Scotland. The Financial Assessment for the Bill estimated that the cost would be £20,000. EROs will also need training to manage the data effectively.

4. What is the full financial impact the Government can expect?

There is significant scope for AVR and Assisted Voter Registration to produce cost savings, but estimates are difficult at this early stage. This is because costs of registering voters are not regularly published. The last systematic data was collected over a decade ago by the Electoral Commission. This was before major changes such as individual registration, online voter registration and the reformed canvass. Evaluations of the financial effects of recent reforms have been dependent on a survey of ERO perceptions. A further difficulty is that the cost would include changes to Electoral Management Systems (EMS). The specialist and commercially sensitive nature of the work made full costs impossible to estimate.

The Scottish Parliament's Financial Memorandum to the Scottish Elections (Representation and Reform) Bill discussed these possible costs of piloting in Scotland – which drew from the regulatory impact in Wales. The latter noted that there were many areas where 'it is not possible to estimate costs. Given the uncertainty around what electoral piloting will be undertaken in future years, it is not possible to present a best estimate of likely costs and/or cost savings.'

Piloting was therefore seen as essential by both financial assessments to better estimate the costs involved. However, there could be net savings with a carefully designed system.

5. How much would the pilots cost?

The initial piloting will involve staff time. This could be covered by existing staff in the relevant government departments and the Electoral Commission. The impact assessment in Wales, however, allocated an estimated cost of £100,000.

There are also possible costs involved in making changes to the Electoral Management Software used by EROs. A figure of around £1.6m was used for illustrative purposes only in Wales and Scotland to assess the potential costs.

6. Would assisted or automatic voter registration be a breach of privacy and/or data protection?

Automatic and Assisted Voter Registration is compatible with data protection, as evidenced by the fact that more than half of the countries in the EU already have it, whilst bound by the GDPR. Complying with both data protection and considerations of data privacy does mean that protections have to be built in, such as ensuring that any automatic registrations are not on the Open Register. Legislation to implement AVR would also provide the perfect opportunity to abolish the Open Register, thereby strengthening privacy.

The 'Open Register' is an edited form of the electoral register, which is available to anyone who wants to buy a copy. At present, it includes information about all people except those who have specifically opted out. Having it available to anyone can put some people at risk, which is why many people currently opt out. If Automatic Voter Registration were brought in, those who were automatically registered would need to be excluded from it, or their information might unknowingly become available in a way that risks their privacy. The best way to do this, for the privacy of all concerned, would be to abolish the Open Register. Its existence provides only marginal financial benefits through its sale, and clarity about the privacy of the electoral register could encourage more people to register, as well as protecting the privacy of all those on the register at present. The full electoral register can still be made available to credit agencies, and this would not prevent CSOs and other relevant actors accessing the marked register for appropriate use.

Issues of data security and keeping the function of the electoral register clear, simple and restricted are good practice in any case, and reduce the risk of other problems at the same time.

Automatic Voter Registration would use the public task lawful basis for processing rather than consent: this would be made clearer by setting out automatic registration in legislation, but even without that legislation it would still apply. It should be noted that though data protection law in the UK is in some flux at the moment, none of the potential suggestions for reform would conflict with Assisted or Automatic Voter Registration.

7. Is it currently compulsory to register to vote? Would AVR be a breach of civil liberties?

AVR would not be a breach of civil liberties. It is currently an individual's responsibility to ensure that they are registered and compulsory that they do so. Individuals who receive a voter registration application form from an Electoral Registration Officer must complete it. They could be subject to a civil penalty fine if they do not.

AVR would therefore not change the balance of responsibilities on the individual – it would simply make it easier for them to fulfil their existing responsibilities. It also would not generate any new data on an individual, simply enabling better sharing of data amongst Government agencies. To ensure protection of civil liberties, new voters added to the register automatically should not be added to the Open Register.

8. Would it lead to electoral fraud – or 'ghost voters' on the register?

The international evidence is that it increases both accuracy and completeness. AVR would empower EROs with more data which they could use to update the register, identify duplicates and amend changes of address.

Citizens would be written to, to notify them of their enrolment and would have the opportunity to make any corrections.

9. What are Wales and Scotland doing?

Wales is the first nation in the UK to introduce AVR. The Elections and Elected Bodies (Wales) Act 2024 requires EROs in Wales to add eligible electors to the local government register in Wales where the ERO is satisfied that the person is entitled to be registered. There is no need for the elector to make an application. This is currently being piloted in four areas with results due to be published in September 2025.

We are currently seeking legal advice to further understand recent developments in Scotland. Scotland will imminently pass the Scottish Elections (Representation and Reform) Act. Our understanding is that the Act (paragraphs 28A-D) will allow electoral registration pilots to take place. Proposals can be put forward by Scottish Ministers after consulting the Electoral Commission, Electoral Management Board for Scotland and other stakeholders. The pilots must be evaluated

by the Electoral Commission. The Scottish Minister then has power to make the changes permanent using a Scottish statutory instrument, again following consultation. This is understood by the authors to be a pathway for implementing AVR in Scotland. AVR was not part of the original government proposal but it received significant support at committee stage. It was therefore proposed as an amendment to the Bill to enable Automatic Voter Registration to be piloted in Scotland. It is reported that the government intends to work with Electoral Registration Officers and 'directly with interested schools, further and higher education institutions and local authorities' to enable AVR for young people.

AVR can therefore work in Wales and Scotland without UK-wide legislation. However, EROs in Wales and Scotland are limited to local sources in the datasets that they can use. They cannot use those held by UK government departments. Legislation to enable AVR across the UK could therefore strengthen AVR in Scotland and Wales.

10. Would this lead to EROs being overwhelmed with duplicates?

EROs are already overwhelmed with duplicates during the immediate electoral cycle as citizens register 'just in case'. This is one of the major pressures that administrators face. AVR might enable a more accurate and complete register throughout the electoral cycle – with a steadier inflow of registration applications.

AVR could facilitate provision of a tool which would help citizens and EROs – a 'look-up tool' to allow citizens to check their registration status, rather than making unnecessary applications.

11. Would there still be a need for individual registration?

It would still be necessary to keep the existing system that allows citizens to register individually. This would ensure that citizens still had control of their individual electoral record. The volume of applications that EROs would receive through this mechanism would be vastly reduced by the use of AVR and assisted registration.

12. Would the annual canvass need to still be undertaken?

Established in the Victorian era, the annual canvass was originally the main method of maintaining the electoral register. It originally involved door-knocking each property to ensure that the register was accurate and complete. Response rates have declined over time. This is a result of the move to continuous voter registration and online voter registration. But it also a result of broader societal changes and practical challenges that canvassers face accessing properties and eligible electors.

The annual canvass has recently been radically changed to involve data matching and automatically re-registers citizens whose details can be corroborated with another public data source.

AVR would further reduce its importance and could produce efficiency savings. Removing it entirely may lead to a decline in the accuracy and completeness of the register. It is therefore suggested that it is retained until the effects of removing it under AVR could be better known.

13. Are there some people who are harder to reach under AVR? E.g. for renters/HMOs. How would it work for them?

Voter registration is much lower for some socio-demographics. For example, the large and growing group of people who rent privately, particularly those in Houses of Multiple Occupation (HMOs), are amongst the least registered people who are eligible to vote. Registration rates would substantially improve through some of the wider measures proposed here. Generation Rent have estimated roughly 20% do not pay council tax directly to the Council, however, and many may not be registered with the DWP. EROs may therefore not have data to automatically register them. Generation Rent have suggested that other sources could be explored, such as GP surgeries and/or NHS Trusts.

Once EROs are granted the power to register people without application, Electoral Commission guidance/secondary legislation could be used to direct EROs towards the most secure and cost-effective data (for example, the planned private rented property database). A focus should also be those groups who are least likely to be registered.

Giving power to an independent Electoral Commission to give guidance on the use of data sources would provide an important check on the power of any future government and ensures a more bipartisan approach.

14. What protections should be in place for victims of violence against women and girls and other vulnerable individuals?

Anonymous registration is vitally important for citizens who want to take part in the electoral process, but whose circumstances mean that they do not want their name to appear publicly on the register. This would include, but is not limited to, domestic abuse victims.

Any citizen who is registered automatically should not be enrolled on the Open Register. Automatically registered electors should therefore have a flag on their record. This will prevent their information from being shared.

Currently anonymous registration only lasts for 12 months, but vulnerable victims of violence may need it for much longer than that. Organisations such as Women's Aid who work with victims of violence have called for anonymous voting to be accessed for life. For this and other reasons, the Open Register should be scrapped.

Further voter registration support for vulnerable individuals might include enabling last-minute registration or emergency proxy votes for people who have had to flee their homes or become homeless. It also includes extending the range of professionals who can attest anonymous registration.

15. How would this affect eligible migrants?

Voting rights in elections across the UK are not restricted to UK nationals. Citizens from the Republic of Ireland and qualifying Commonwealth countries are eligible to vote in UK parliamentary elections. The criteria for eligibility for local and devolved elections varies. All legally resident foreign nationals can also register to vote in Scotland and Wales for respective parliamentary and local elections. Registration rates are especially low amongst eligible Commonwealth and EU nationals.

Registration rates should improve through measures put in place to improve voter registration rates across the whole population. However, it is possible that datasets such as the DWP CIS may not hold nationality data. Additional interventions could be explored through pilots once the legislation is in place.

16. What do the public think of AVR?

According to a 2024 YouGov Poll, 81% of the public support AVR (figure 11). It was the most popular electoral reform out of all of those tested in the poll. It also had overwhelmingly positive support across the political spectrum by those voting for all major UK-wide political parties.

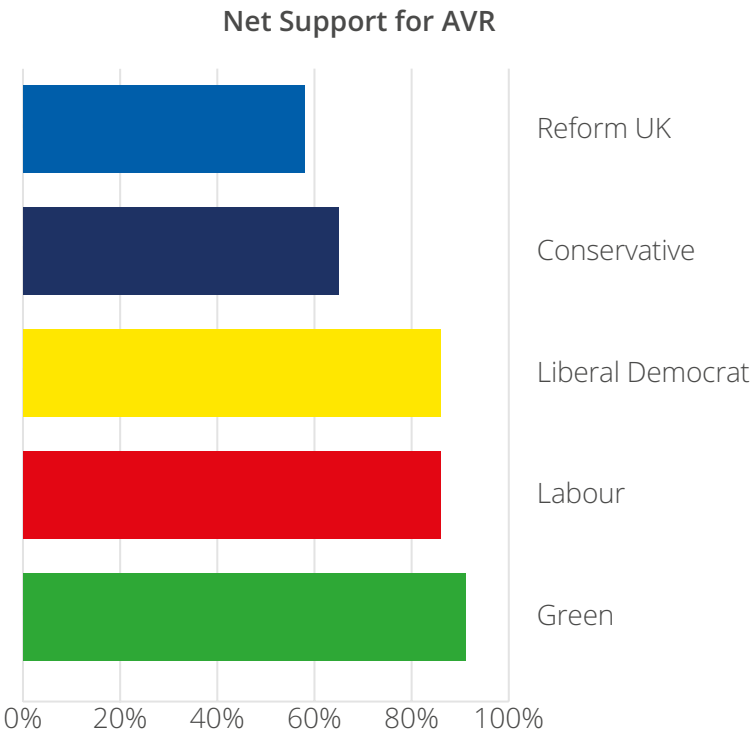
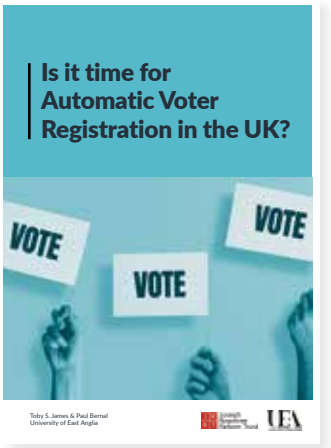


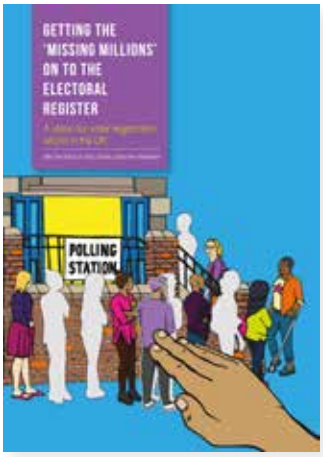
Figure 11: *Support for AVR by political party. Source: authors using data from* ***YouGov****.*

Further reading

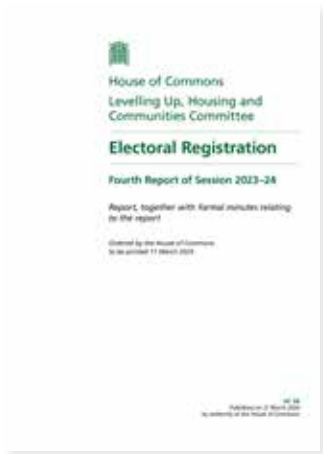
UK Democracy Fund reports:



Reports from the All-Party Parliamentary Group on Democratic Participation:



Select Committee reports and evaluations of electoral registration:



Electoral Integrity Project

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