

The Association of Electoral Administrators



Response to the Cabinet Office consultation on renewals for overseas electors

INTRODUCTION

The Association of Electoral Administrators (AEA) was founded in 1987 and is the professional body representing the interests of electoral administrators in the United Kingdom. It is a non-governmental and non-partisan body and has 1,863 members, the majority of whom are employed by local authorities to provide electoral registration and election services.

The AEA welcomes the opportunity to respond to the Cabinet Office consultation on renewals for overseas electors.

QUESTIONS

ONLINE RENEWALS

1. Do you think take up of online renewals would be high? If low, would it be worth the investment?

The Association welcomes online renewals especially following the introduction of online registration for regular category electors. In the 21st century, the use of online technology is expected by the general public.

Online renewal take up may be low initially and therefore it is essential that clear messaging is sent to overseas electors at the time their renewal is due and in any subsequent reminders. From a user journey perspective, renewing online is likely to be far easier especially whilst living abroad.

In addition, applicants will need to be made aware that, if they do not renew their application before their registration expires, they will be required to make a full new application, which may include repeating the attestation routes. This may encourage overseas electors to renew online before their registration expires in order to avoid the full application route, especially immediately prior to a UK Parliamentary General Election.

2. Would you be concerned if overseas electors could renew online, but not other special category electors?

From an equalities point of view, all special category electors should have the same facilities to register online. However, providing facilities for

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overseas electors should not be delayed because it is not available for other special category electors. Hopefully, with the move towards overseas electors' renewal online and, subject to the passing of legislation, similar provision can be made available for other special category electors.

EXTENDING REGISTRATION PERIOD BY X YEARS

3. Would this be desirable, or should a different frequency be used to try to avoid this – perhaps 4 years, or 5 years and 1 month?

With regards to frequency of renewals the Association has not proposed any extension of the renewal period in our previous overseas consultation response. Although extending the period might be more administratively convenient, there is a risk that the integrity of the register will be jeopardised, which the Association would not favour.

If the renewal period changed to five years, or five years and one month, it would still mean a large workload ahead of a UK Parliamentary General Election. In addition, there is the potential risk of email addresses being out of date after five years, which would increase administrator workload in relation to contact and further queries etc. There may also be an increase in duplicate registration applications being made as people will have forgotten that they are already on the register as an overseas elector if they applied three or four years previously. Additionally, there are currently a reasonable number of overseas electors that choose not to renew after twelve months which suggests maintaining them on the register would not be correct.

4. Should the frequency of renewals be set in primary legislation, meaning it would be difficult to change, or should the OEB provide for a power to vary the frequency by SI?

The frequency of renewal should be in secondary legislation so it can be amended more easily if necessary in the future.

5. What would your views be on such risks? Is accuracy not already a greater risk for overseas electors because of their nature?

See our response to question 3 above. Any extension of the renewals period would bring with it the added risk of details being out of date, the longer the period, the greater the risk. There may be merit in considering an 18 month renewal period although careful consideration needs to be given to the resultant issues that might arise.

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6. What would be the rationale for enabling overseas electors to renew on a less frequent cycle than other special category electors?

At present the renewals for special category electors are already different:

5 years	HM Forces and their spouses or civil partners
12 months	Overseas elections, Crown servants and British Council employees and their spouses or civil partners
12 months	Homeless, mental patients, remand prisoners
12 months	Anonymous

Service electors are more likely to be UK based when they leave the forces. Also, they often retain a connection to their declaring address unlike overseas electors. Overseas electors may well move within their new country or to another country so contact addresses will get out of date. This could be a real issue at a snap UK Parliamentary General Election with postal vote packs being sent to wrong addresses etc. In addition, overseas electors are probably less likely to return to the UK and register as an ordinary elector. EROs are also less likely to receive any notification if the overseas elector has died.

7. Would both online and X-yearly renewals be desirable and why?

Both online and an extended renewals period of no more than 18 months would be desirable to spread the workload and minimise renewals ahead of a planned UK Parliamentary Election and, at the same time, maintain integrity. 18 months would also mean that, in the longer term, applications from one UKPGE would fall six months ahead of the next planned UKPGE thereby spreading the workload and allowing more time to resolve queries etc.

8. If only one option was possible, which would you prefer and why?

If only one option can be taken forward, then online renewal is the Association's preference.

CONCLUSION

As outlined in our previous overseas electors consultation responses, the AEA looks forward to working with the Government, the Electoral Commission and other key stakeholders in identifying and addressing the issues that arise as the policy is further developed, including overseas renewals.

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There has been a longstanding commitment arising from our bilateral meeting with Cabinet Office officials on 18 January 2016. At that meeting, it was suggested and agreed that the AEA would meet with appropriate officials from the Cabinet Office to discuss the processing and practical implications relating to the removal of the 15-year rule and to assist with drafting of legislation. It was further agreed that the Electoral Commission would be invited to such a meeting.

In our response to the consultations in March 2016 and November 2016, we highlighted this and the AEA still awaits and looks forward to attending such a meeting.

John Turner
Chief Executive

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