

# The Association of Electoral Administrators



## Response to the Scottish Elections (Franchise and Representation) Bill Financial Memorandum – Call for Views

**Organisation:** Association of Electoral Administrators (AEA). A joint response from the National AEA and the Scotland and Northern Ireland Branch of the AEA.

**Summary of Organisation:** 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 just under 2,000 members, the majority of whom are employed by local authorities to provide electoral registration and election services. There are eleven regional branches of the Association covering the United Kingdom one of which is Scotland and Northern Ireland.

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### Call for Views Questions:

#### Consultation

**Question 1: Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?**

Yes, we responded to the following consultations:

- March 2018 – [Scottish Government consultation on Electoral Reform](#)
- March 2019 – [Scottish Government consultation on Prisoner Voting](#)

**Question 2: If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?**

No.

In our March 2018 response to the [Scottish Government consultation on Electoral Reform](#) under 'Other comments' we stated:

*"In addition, we would like clarification that the Scottish Government will guarantee to fully fund any new burden/initiative resulting from legislative reforms, and to fully engage with the electoral community in relation to practically implementing, developing and planning any new mechanisms or processes including the drafting of legislation."*

The Financial Memorandum recognises the additional costs related to the increase in the electoral franchise as set out in the Bill with the following financial summary extract showing the areas which impact our members area of work:

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Category of costs	Estimate (£)
Marginal increase in costs of delivering elections as a result of an increased number of voters (e.g. postage and printing of electoral materials) – (costs on Local Authorities)	£200,000 per poll
Electoral management software changes – (Scottish Government costs)	£150,000 – £250,000 one off
Electoral registration officer costs - initial registration – (costs on EROs)	£340,000-360,000,

It is noted that the Scottish Government will meet the Electoral management software changes at a cost of £150,000 - £250,000 one off.

Paragraph 21 (Costs on Local Authorities) of the Financial Memorandum states:

*"Additional costs which will be incurred directly by local authorities are limited to the estimated £200,000 as a result of the additional voters at local government elections. Since this represents a marginal cost, split across all thirty-two local authorities, it is not proposed that additional funding would be required. This is in line with the approach taken when the voting age was lowered to 16. The cost of Scottish Parliament elections is met by the Scottish Government."*

Whilst it is acknowledged that the additional costs will be met by the Scottish Government for their elections, local authorities should not have to pick up the additional costs as a result of this new burden due to changes in legislation. Whilst the costs of £6,250 per local authority may not seem significant in the scheme of things these additional costs will be incurred by each of the thirty-two local authorities at each local poll at a time of austerity when cuts are having to be made to essential key local authority services. As a result, an additional £200,000 should be provided whether split equally as £6,250 to each local authority or by some other calculation as part of their local government settlement funding from the Scottish Government.

Paragraph 24 (Electoral Registration Officer Costs) of the Financial Memorandum states:

*"...that the number of Scottish residents from other countries who would be newly eligible to vote would be in the region of 55,000. Assuming similar pro-rata costs to those incurred for the registration of 16 and 17-year-olds following the extension of the franchise in the Scottish Elections (Reduction of Voting Age) Act 2015, an additional £340,000-£360,000 would be needed to cover initial registration costs in the financial year 2020/21. Thereafter registration costs would form part of the usual costs of the annual canvass."*

As stated in paragraph 22 "Under the terms of the Representation of the People Act 1983, the costs incurred by EROs in the performance of their statutory functions are paid by the relevant local authority from funds made available through the local government settlement".

As a result, additional funding should be made to the local authority via their local government settlement funding from the Scottish Government so that the local authority can then provide additional funding to the Electoral Registration Officer (ERO) to meet these additional costs. Changes in legislation have created this new burden on the ERO.

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It is also noted that the Financial Memorandum makes reference to the additional 55,000 electors registration costs forming part of the usual costs for the annual canvass after their initial registration. However, it should be noted that the annual canvass costs in future years will also increase as there will be additional electors to canvass with data processing for those that move address along with further individual communications, likewise for those electors that do not data match as part of the annual canvass.

Paragraph 25 (Electoral Registration Officer Costs) of the Financial Memorandum states:

*"There would be no additional registration costs for the extension in franchise to foreign nationals. EROs currently access a Home Office system to assess for check immigration status, which they will continue to use at no extra cost. EROs currently carry out these checks on occasion for Commonwealth citizens."*

Whilst there will be no additional costs re checking data, as highlighted earlier there will be additional costs in processing the additional electors as well as additional communications both in the initial registration stage and ongoing each year as part of the annual canvass.

The Association is extremely disappointed that these additional costs created as a result of the changes outlined in the Bill will not be funded. Instead it would appear that local authorities are expected to meet these additional new burden costs from their existing funds at a time of austerity. We would therefore strongly urge the Scottish Government to review the provision of funding for the changes created as a result of the Bill to ensure local authorities and EROs are fully funded. Provision should also be made for the estimated funding outlined to be made available in addition to local authorities and EROs being able to apply for top up funding should the actual costs exceed the estimated costs.

## **Question 3: Did you have sufficient time to contribute to the consultation exercise?**

Yes

## **Costs**

## **Question 4: If the Bill has financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details.**

The costs outlined in the Bill are estimated costs. The true costs will be known once the Bill is introduced and after the first year of registration and polls.

## **Question 5: Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?**

Yes

## **Question 6: If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?**

As outlined in our response to question 2 the Association is disappointed that these additional costs created as a result of the changes outlined in the Bill will not be funded. Instead it would appear that local authorities are expected to meet these additional new burden costs from existing funds. We would therefore urge the Scottish Government to

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review the provision of funding for the changes created as a result of the Bill to ensure local authorities and EROs are fully funded. Provision should be made for the estimated funding outlined to be made available to local authorities and EROs in addition to them being able to apply for top up funding should the costs exceed the estimated costs.

## **Question 7: Does the FM accurately reflect the margins of uncertainty associated with the Bill's estimated costs and with the timescales over which they would be expected to arise?**

The Financial Memorandum refers to the additional 55,000 electors registration costs forming part of the usual costs for the annual canvass after their initial registration. However, as outlined earlier in question 2 it should be noted that the annual canvass costs in future years will also increase as there will be additional electors to canvass with data processing for those that move address along with further individual communications, likewise for those electors that do not data match as part of the annual canvass.

## **Wider Issues**

### **Question 8: Do you believe that the FM reasonably captures any costs associated with the Bill? If not, which other costs might be incurred and by whom?**

Paragraph 21 states:

*"Additional costs which will be incurred directly by local authorities are limited to the estimated £200,000 as a result of the additional voters at local government elections."*

Paragraph 26 states:

*"Additional voters participating in elections would marginally increase the costs of delivering elections, e.g. for postage and printing of electoral materials. These costs are (on average) around £3 per voter, so the additional costs would be around £200,000 per poll."*

The costs of £3 per voter, is that calculated based on voting in the polling station or voting by postal? The change in prison voting franchise will mean they will have to vote by post as there is no provision for polling station voting in prisons. Therefore, the additional costs will be different for prisoner voters compared with polling station voters and will need to be considered separately.

### **Question 9: Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs?**

The only comment regarding future costs, would be that any other changes to electoral administration will have to consider the higher number of electors, from both foreign nationals and prisoners.

**Peter Stanyon**  
Chief Executive of the AEA

**Andy Hunter**  
Chair of Scotland and  
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**5 September 2019**