

**SUBMISSION:
MODERNISING THE
ELECTORAL PROCESS**

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DORAS SUBMISSION (MARCH 2019)



ABOUT DORAS

Doras is an independent, non-profit, non-governmental organisation working to promote and protect human rights. Our core areas of work include direct support, integration planning and collaborative advocacy.

Doras provide a free and confidential advice and legal information service in Limerick to over 1,200 people on immigration-related issues. We advocate at local, national and international level for change in policy and legislation relating to International Protection, Immigration, Integration, Anti-Racism and Anti-Trafficking.

As part of our work promoting and facilitating migrant integration in Ireland, Doras aim to increase awareness of and participation in the election and political process through public campaigns, information provision and direct support.

OVERVIEW

This submission is informed by our direct support experience of working with people from a migrant background and our advocacy work on integration policy over the past 19 years. We aim to contribute towards the modernisation of the electoral process in Ireland for the benefit of all Irish residents, including Ireland's new communities who face particular barriers to participation in Irish elections.

Voter participation is a key indicator of effective migrant integration, as recognised by the EU and by the Irish government in the National Migrant Integration Strategy 2017 – 2020¹. While Ireland allows for broad participation in elections, particularly in the local elections, people of non-Irish nationality continue to be under-represented on the voting register.

In Ireland, people of non-Irish nationality represent 13% of the Irish population². However, just 5% of people on the voting register in Ireland are of non-Irish nationality³.

¹ National Migrant Integration Strategy 2017 to 2020. Department of Justice & Equality. Available at: http://www.justice.ie/en/JELR/Migrant_Integration_Strategy_English.pdf/Files/Migrant_Integration_Strategy_English.pdf

² Census 2016. Central Statistics Office (CSO). Available at: www.cso.ie

³ ESRI Monitoring Integration 2018 (Pg. 56). Available at: <https://www.esri.ie/system/files/media/file-uploads/2018-11/BKMNEXT364.pdf>

The key barriers that Doras has identified with regard to people from a migrant background who wish to register to vote in Ireland, include the following:

- Access to information on voting rights & registration process.
- Language barriers.
- Overly complicated process, including multiple registrations.
- Reluctance to engage with Gardaí.
- Challenges changing address.

• **KEY PROPOSAL #1: SIMPLIFICATION OF FORMS & PROCESS**

The simplification of registration forms and streamlining the process to enable voter registration in one single form would help to address a number of the barriers people from a migrant background face when seeking to register to vote. In our experience supporting people through the voter registration process, the availability of multiple forms is overly complicated and is a key issue raised by the people with whom we work.

Doras agree with the proposed changes outlined in Key Proposal 1. The availability of both an online and paper single registration form would be a very positive step. In addition, ensuring that the forms are in-line with National Adult Literacy Agency (NALA) guidelines regarding Plain English would help to address language and communication barriers often experienced by people from a migrant background.

The use of images and visual aids can assist people with language barriers and limited English language skills to better understand complicated instructions and could usefully be considered for voter registration forms, in-line with NALA guidelines.

In addition to the proposed changes outlined in Key Proposal 1, Doras recommend that additional consideration is given to the linguistic diversity of Ireland's population and the language barriers experienced by a significant proportion of the population. According to the most recent Census in 2016, a total of 612,018 people speak a language other than English or Irish at home⁴. This number represents people of Irish and non-Irish nationality, including people who have become Irish citizens through naturalisation.

Ireland's National Migrant Integration Strategy (NMIS) 2017-2020⁵ acknowledges the linguistic diversity of Ireland's population and the barriers people face when seeking to register to vote in Ireland's elections and action 60 requires local authorities to make multi-lingual information resources on voter registration available.

⁴ Census 2016. Central Statistics Office (CSO). Available at: www.cso.ie

⁵ National Migrant Integration Strategy 2017 to 2020. Department of Justice & Equality. Available at: http://www.justice.ie/en/JELR/Migrant_Integration_Strategy_English.pdf/Files/Migrant_Integration_Strategy_English.pdf

To compliment action 60 of the NMIS, consideration could usefully be given to making multi-lingual forms available online and on paper in Ireland's most widely spoken languages, which may help to address the language barriers people face with regard to participating in the elections in Ireland.

- **KEY PROPOSAL 2: A ROLLING REGISTER OR CONTINUOUS REGISTRATION**

The creation of a "live" register would bring considerable benefits and would help to simplify the overall registration process.

Throughout our experience of supporting people to register to vote, the first step for all potential voters, without exception, is visiting the www.checktheregister.ie website. This is done independently or with the assistance of Doras staff where internet skills or access is a barrier. As the majority of people use this online function to check the register already, in our experience, enabling people to update details in the same step and on a rolling basis would help to increase efficiency and to streamline the process.

Maintaining a register available for inspection at the local authority offices would ensure continued access for those who have limited internet skills or access.

- **KEY PROPOSAL 3: OPTIONAL ONLINE REGISTRATION & SECURE SELF-SERVICE**

Optional online registration and secure self-service would help to overcome a number of the barriers faced by the people with whom we work.

As noted above, the majority of people with whom we work already use the www.checktheregister.ie website at the beginning of the voter registration process. Facilitating online registration would therefore allow people to register to vote at the same time, thus greatly simplifying the process.

In our experience of supporting people to register to vote in the elections, we believe that the majority of our clients would favour online self-service registration over the existing or hard copy application process.

Access to information on the voter registration process is a key barrier to participation in the elections, from a migrant integration perspective. Facilitating online registration will help to overcome some of the barriers relating to access to information by simplifying the overall registration process. This would be further strengthened if the website also contained related information in multiple languages on the registration process and the wider voting system in Ireland, acting as a centralised online portal for voter information and registration.

Doras recommend that this opportunity is taken to address these barriers by creating a centralised online portal for both registration and information. In developing an online registration system, Doras recommend that consideration is given to the linguistic diversity and the information needs of all residents in Ireland and that the following elements are considered:

- User-friendly layout.
- Visual aids and use of images.
- Availability of Information on registration and voting process in plain English.
- Availability of multi-lingual information materials & registration forms, in-line with linguistic diversity of Ireland's population.

- **KEY PROPOSAL 4: MOVING TO INDIVIDUAL REGISTRATION ONLY**

The proposal to move to individual registration, as opposed to the existing system of household registration, is supported by Doras but we acknowledge the benefits and risks to this proposal.

Household registration may be a benefit for parents and young people living together in a family household and Doras acknowledge that moving to individual registration may negatively impact on young people living with their families.

However, individual registration would likely be of benefit to people who live in shared private rented accommodation and who may not wish to or be able to register as a group in a given household. Adults living in shared households in private rented accommodation is increasingly common, including among the people with whom we work.

The risks associated with moving to individual registration regarding the impact on young people living in family households may be addressed by establishing an additional system of provisional registration for young people aged 16 to 17 years. This provisional registration system for young people could be rolled out through a schools programme with automatic registration activated when an individual turns 18 years old.

- **KEY PROPOSAL 5: ENABLING A SINGLE NATIONAL REGISTER DATABASE WITH UNIQUE IDENTIFIERS**

A single national register database will contribute to simplifying the overall registration process and will further address some of the barriers faced by our target group.

People who move from one county or local authority region to another will be facilitated to register with greater ease and will help to prevent or minimise duplications in the system. Doras has not identified any risks of relevance to our work regarding this proposal.

- **KEY PROPOSAL 6: MOVING TO VERIFIED IDENTITY USING PPSN**

The proposal to verify an individual's identity using the existing public sector PPSN database, as part of this reform process, would help to address the fears expressed by some new community members. Verifying identity using PPSNs will also generally simplify the registration process, making the overall process more efficient.

A significant barrier to registration, in our experience of supporting people through this process, is the requirement to present to the Garda station to have their signature witnessed when seeking to be added to the supplementary register. Doras is aware that some people have fears regarding engagement with the Gardaí, due to negative experiences with police in the country of origin as well as with the Gardaí in Ireland.

Doras therefore agree with the proposal to verify identity using PPSNs, checked against the public sector database, which would circumvent the need for people to present identity documents to An Garda Síochána.

While Doras acknowledge that some people may not be willing to provide their PPSNs and that some people may have privacy concerns, this proposal would help to address the specific concerns that act as a barrier to participation in the elections from a migrant integration perspective with regard to fear of engaging with the Gardaí.

- **KEY PROPOSAL 7: DATA SHARING TO MAINTAIN ACCURACY & COMPREHENSIVENESS**

The existing system requires individuals to update their contact details on several separate Government databases each time there is a change of address.

People living in Ireland of non-Irish nationality are significantly more likely to live in rented accommodation and therefore have less secure living arrangements than Irish nationals. According to the ESRI Monitoring Integration 2018 report, less than one in fourteen Irish nationals live in rented accommodation, compared to one in two people of non-Irish nationality on average⁶.

The proposal to introduce increased data sharing for the purposes of maintaining accuracy and comprehensiveness in the registration process would help to streamline the process and all public service databases, which would address some of the issues faced by people who may be less familiar with the requirements of various public service systems in Ireland, including the voter registration process.

⁶ ESRI Monitoring Integration 2018 (Pg. 56). Available at: <https://www.esri.ie/system/files/media/file-uploads/2018-11/BKMNEXT364.pdf>

ADDITIONAL PROPOSALS

Modernising the electoral process is an opportunity to address all barriers people in Ireland face with regard to participating in the election and political process.

Doras support the following additional proposals with regard to modernising the electoral process:

- Allowing provisional registration for young people aged 16 to 17 years, with registration automatically becoming active on their 18th birthday.
- Specific provision for people with no fixed address e.g. people experiencing homelessness to ensure a standard procedure across the country.
- Provision for anonymous registration for people whose safety may be at risk if their details are public on the register.

CONCLUSION

Doras welcomes the proposals outlined by the Department of Housing, Planning and Local Government on modernising the electoral process. We believe these proposals will help to facilitate voter registration and will address many of the barriers people in Ireland face, including people from a migrant background.

The key barriers Doras has identified through our work promoting and facilitating migrant integration include access to information; language barriers; requirements to present to An Garda Síochána and the challenges of re-registering following change of address. Simplifying and streamlining the registration process will help to address these barriers and may facilitate greater participation.

In addition to the proposals outlined by the Department, Doras recommend that this opportunity is taken to ensure that all residents in Ireland are considered in this reform process with respect to the diversity of Ireland's population. Doras recommend that registration forms are available in multi-lingual formats to ensure that the needs of all people living in Ireland are met. Ideally, in creating an online system of registration, this opportunity would be taken to make information materials explaining the voting system, voting rights and voting process in Ireland in plain English as well as in multiple languages.

Ensuring access to information for people from a migrant background on the voting and political process is in-line with Ireland's existing policy on migrant integration, which is intended to be mainstreamed across all Government departments.

Doras commend the Department for the work undertaken on these proposals to date and we welcome the opportunity to input into the process.