

Thank you for the opportunity to comment on the recently published proposals to reform the electoral registration process. In my opinion, reform is long overdue, as the right of individuals to vote for those who govern them is the cornerstone of our democracy, and it is essential that citizens have full confidence in the electoral and registration processes. On this note, I believe the current registration process is flawed, as it does not contain sufficient safeguards to verify the identity of applicants for registration and to prevent individuals from being registered in more than one location. In light of the fact that there have been a number of elections [particularly local and general elections] which have been decided by no more than a handful of votes, and the fact that there have been legal challenges to election results, I believe that these flaws should be removed as a matter of some urgency, and I would say at the outset that, while I acknowledge the range of complex issues involved in introducing any reforms, I believe that a period of 2-3 years for completion of the reform project is far too long, and that the reforms should be introduced within a period of not more than 18 months.

My specific comments on the published proposals are as follows:

1. I believe that the main requirement is that the register is accurate - that no person can have more than one vote, and only those who are eligible to vote are included on the register. Therefore, the process must include adequate safeguards and controls to ensure that this outcome is achieved. The second most important requirement is that the processes for applying to be included on the register, to be removed from the register, or to change one's address on the register, should be easily understood, and relatively straightforward for the citizen (or resident, as the case may be).

2. The most important improvement required is the one referred to in key proposal no. 6 - the use of the PPSN to verify identity and to prevent fraud. The PPSN is an existing unique identifier, and it should be used for all verification processes and should be mandatory.

3. I support the proposal for rolling or continuous registration (especially in terms of making the process easy to understand and use) on condition that the registration authority has sufficient time to verify identity and to ensure that the person registering could only be registered in one location. Clearly, this would be a lot more feasible if the proposal to link or integrate each of the local authority registers into a single system is implemented. I would have a concern that - in the case of a person registering in order to transfer his/her vote - allowing registration up to 14 days before polling day may not leave enough time for that person's vote at their previous location to be cancelled before a polling card is sent to the new location.

4. I believe that a simple and quick appeals system (not requiring courts, or legal representation) should be available to those not happy with a decision of the registration authority.

5. With regard to the "other proposals" referred to in the publications, I do not support a process involving some form of pre-registering 16-17 year olds. This is totally unnecessary, and I suspect that those working on the registration process will have enough to do, in dealing with the various entries to and removals from the register, and the relocation of those eligible to vote, without having to maintain some form of parallel register for people who have no right to vote at this point in time. I support the proposals regarding making provision for people who are homeless, and for people whose identity or whereabouts must be withheld for

their own safety. I also support the proposal to require individual registration, as opposed to household registration.

6. I do not see any reference to the issue of people who are registered to vote in Ireland but who are living abroad. This appeared to be a significant issue at the time of the referenda on marriage equality and on abortion, and it would appear to me that there may be significant challenges in efficiently and effectively applying and enforcing the law relating to this cohort of people. I don't have a solution to it, but I don't think it should be ignored. I think there is agreement that the integrity of the process is critical, and any law which is too vague to be fairly and effectively applied has no place in such a process.

I hope that my comments are helpful.

Thank you

Joe O'Neill