



Submission to the Department of Housing, Planning and Local Government Public Consultation on proposals to modernise the Electoral Registration Process

Labour Equality is a section within the Labour Party which aims to promote the concept and the realisation of equality in Irish society. We coordinate the activity of party members experiencing inequality including under the grounds of gender, sexual orientation, age, disability, membership of the Traveller Community, race, ethnicity, religion, family status, civil status, and other issues, as well as other party members who are concerned with equality issues. We work internally within the party and campaign externally on issues of equality. We work to encourage people experiencing inequality or discrimination to join and play an active role in the Labour Party, and in political life, including running for election.

Labour Equality is pleased to see the Department of Housing, Planning and Local Government is looking into the process of reform of the electoral register, and welcomes the opportunity to make a submission to this public consultation.

The electoral process is a vital part of our democracy, and the ability to take part in elections, either by voting, or by running for election, is the right of every resident of Ireland (as applicable depending on their citizenship). It is the duty of the state to facilitate people, particularly those who may face extra difficulties, in exercising these rights.

We broadly welcome the initiative to provide an online process for voter registration. However we note that not all members of society will be able to avail of this, and we believe that it is also important to have an option of paper based or in-person registration. Care should be taken that vulnerable groups such as some older people, people with certain disabilities, homeless people etc., are not disenfranchised through these proposed reforms.

We welcome plans for a rolling register as the current system of draft and supplemental registers is confusing for many. We agree with the suggestion to create one national database and registration system in place of multiple systems at county level. We welcome the idea to limit the number of forms needed to one for initial registration and one for any subsequent changes. These initiatives will all simplify the system and therefore make it easier for people to realise their right to enfranchisement.

Any new process needs to be inclusion proofed, including but not limited to:

- The use of plain English in forms and information to assist those with low literacy
- The provision of information in multiple languages given that migrants are eligible to vote in local elections, and new citizens may not speak English or Irish as their first language
- Ensuring online systems are accessible for people who are blind or have a visual impairment
- Ensuring people who need the assistance of a carer or other person to complete forms are not excluded
- Introducing a system to allow people with no fixed abode to register to vote

Rates of participation by migrants in the electoral process are very low. It is to Ireland's credit that all immigrants can vote (and run for election) in local elections, but their participation rates need to be improved to achieve a more inclusive society. Research by the Immigrant Council of Ireland, the Migrant's Rights Centre and others has shown that knowledge of the entitlement to vote is low among migrant groups.

- Voter information should be made available in multiple languages
- The requirement to present at a Garda Station to have forms signed should be removed as this may put off people with previous bad experience of police in their countries of origin. (Anecdotally even Irish citizens now have difficulty in getting various official forms signed in Garda Stations as Gardaí will not sign them unless they have personal knowledge of the individual.)
- Many migrants are not familiar with our PRSTV system, or with our electoral areas and constituencies, so a voter education campaign is necessary

While we broadly welcome the use of unique identifier numbers to reduce duplication etc., on the register, we would have some concerns if the PPSN were to become compulsory for registration.

- This could have a chilling effect on some people's willingness to be on the register and thus unintentionally disenfranchise them
- Some eligible voters, such as European and other international students living in Ireland, or family members of certain visa holders may not have a PPSN number

We feel that consideration should be given to the use of other ID numbers/ forms of identification to check eligibility, such as passports, driving licences or residence permits.

In addition we have concerns about the proposal to check addresses using PPSN, and potentially to automatically update addresses on the voter register through this process. While it may be convenient for some people to update their address in this way we believe it should always be optional. Many students and young professionals have to move address multiple times in a short number of years for housing reasons. Particularly in urban areas this can mean moving constituency or local electoral area several times. Having to learn about a whole new slate of candidates and local issues every year or so may put an unnecessary barrier in the way of people voting, and thus discourage people from using their vote at all. People may need to update the address registered to their PPSN for other reasons, but may wish to keep their permanent/family home address, where they are familiar with the political landscape, for voting for some years. This option should be available to all.

Further recommendations we would like to make are:

- We suggest writing to everyone on the register at least once in an effort to get people to confirm their details remain the same. In order to clean the register if a vote has not been exercised in (for example) 10 years, and the person does not respond to a letter they could then be safely removed from the register.
- Individual registration may be the best way to go for data security purposes, for people in certain forms of rented accommodation etc., but there needs to be a way for people who require assistance from a carer, family member, local official or other to be able to assist them to register. (Anecdotal evidence suggests that carers, social workers, Councillors and others are having difficulty assisting vulnerable people with interactions with various service providers who will only deal with a named account holder directly.) Consideration should be given to offering both options.

- A robust public voter education campaign is needed in conjunction with any changes to the system, and this would also be a good opportunity to inform voters further on the PRSTV system, what their local council/TD can/cannot help them with, how to find your polling station, how voting works when you turn up at the polling station, who is eligible to vote in which election, etc. Despite the efforts of students unions and other organisations in registration and information drives there is still a lot of confusion and disinformation amongst the public. The experience of our members tallying votes in elections across the country is that many people make mistakes when voting – putting multiple 1's or X's in boxes etc., thus rendering their votes invalid. We would encourage a wider public voter education campaign to be carried out as part of this reform process.
- We would welcome a pre-registration system for 16/17 year olds, and/or automatic registration of 18 year olds, including a schools-based campaign on voter rights. We would like to see the right to vote extended to 16 & 17 year olds at local and European elections, and if that was to become law, a schools-based information and registration system would be useful.
- Information on registering to vote and voter rights, as well as an option to register should be offered through immigration services for people in relevant categories, and if/when migrants acquire Irish citizenship they should be informed of increased voting rights and have an option to automatically update their nationality on the register.
- Postal voting should be made more accessible, for example in a wider range of situations when people may be travelling abroad or may be elsewhere in the country on polling day (e.g. at a family wedding) where this is known in advance by the person and they can apply for it as soon as an election is called. Self-certification of circumstances should be sufficient to allow this. We would also propose extending the franchise on a postal basis to Irish citizens living abroad for up to five years.
- It can be difficult to find entries on www.checktheregister.ie due to the specific way you must find the exact address. We would hope that any new system could be easier to search and allow for local variations in how addresses are spelled, near matches if spelling mistakes are entered, etc. (Renters in particular may not be supplied with addresses in the exact format on the register by their landlord). In Dublin people may not automatically know which County Council they come under and it would be useful if you did not have to specify this first.
- We agree that the use of the edited register for marketing purposes is no longer a good idea in light of data protection and privacy concerns; however we firmly believe that the register should be publicly available for consultation and that copies of the register should be available for public representatives and election candidates as part of the democratic process. The public availability of the register still has a role to play in discouraging electoral fraud, and in the transparency of the electoral system, however the details publicly available must be limited (not including ID numbers, date of birth etc.) to minimise risk of identity theft.
- An Electoral Commission should be established to deal with these and other voter and election related matters in future.
- We reiterate the need for strong data protection and security systems at all stages of this reform process, but do not believe that this should act as a deterrent to reform.

*Evanna Craig, Chairperson,
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