



Union of Students in Ireland
Aontas na Mac Léinn in Éirinn

Written Submission to the Public Consultation on Modernising the Electoral Registration Process

March 2019

The Union of Students in Ireland (USI)

The Union of Students in Ireland (Aontas na Mac Léinn in Éirinn) is the national representative body for third-level Students' Unions in Ireland. Founded in 1959, USI now represents more than 374,000 students in Further and Higher Education Colleges across the island of Ireland. The goal of USI is to work for the rights of students and a fair and equal post-secondary education system in Ireland. USI is a full member of the European Students' Union (ESU) which represents students from 46 National Students' Unions in 39 countries, and a member of Eurodoc, the European Council for Doctoral Candidates and Junior Researchers.

The Union of Students in Ireland (USI) welcomes the public consultation on proposals to modernise the electoral registration process, particularly as an organisation with years of experience in directly registering thousands upon thousands of students to vote each year.

Comments on Government Proposals

Key Proposal No. 1: Simplification of forms and process

USI would welcome a simplification of the forms used to register to vote and the process. The majority of forms used by students are the RFA, RFA1 and RFA2 forms. These forms and the differing deadlines associated with them not only cause unnecessary confusion but also result in the incorrect forms being used by students, resulting in applications to be included on the register being rejected.

During voter registration efforts and campaigns, USI noticed certain elements of confusion with the RFA forms. The reference to the 'local Garda Station' on supplementary registration form RFA2 is confusing. Some new form of words should be found to clarify that the Garda Station referred to is the station local to the address of the registrant. Further, it may be worth considering removal of the apparently absolute requirement to attend a Garda Station to have a form stamped –

this appears to obviate the possibility of temporary concessions to facilitate registration in other locations such as shopping centres or on campus.

It is not clear that the term 'edited register' means that your details can be used for direct marketing purposes by a commercial or other organisation unless you read the notes to the form carefully, which most people would not read if they were trying to fill in the form quickly as much else of the form is self-explanatory.

During voter registration campaigns run by USI and local Students' Unions, we have observed significant and troubling inconsistencies in how local authorities process voter registration forms. For example, some city and county councils would not accept forms in bulk and other would accept forms in bulk. While there may be good reason for this, USI found there was a lot of inconsistency between what different councils requested, and that, as a result, it is easier to be registered in some constituencies than others.

We have also observed that local authorities have interpreted legislation in variable fashions i.e. in the Electoral Act 1992, it provides that a persons inclusion to the supplementary register must be stamped and verified by "the local garda station". However, we have seen local authorities demand that the form be stamped by garda stations local to them as opposed to local to the person. Members of An Garda Síochána also communicated this confusion to us.

Many of those wishing to get registered to vote that we met were confused about the process overall e.g. that there were deadlines, if/how they could register for a postal vote, what address they should register from (college or home addresses) etc.

USI believes that guidelines on the acceptance and processing of these forms issued by the Minister would simplify access to voter registration. Guidelines to local authority staff could give comfort to registrants.

Key proposal No. 2: A rolling register or continuous registration

USI welcome this proposal as it would facilitate students who move home addresses often, as is the case of many students from term to term while in education. It would also allow students and young people who turn 18, to register once they do so.

Key proposal No. 3: Optional online registration and secure self-service

USI would welcome online registration as it is a quick and immediate method to registration and would allow students to register wherever they are with the use of the internet.

USI believes a campaign encouraging people to get a MyGovID is needed in order to maximise the potential of online registration and ensure that as many people as possible use the service.

Key proposal No. 4: Moving to individual registration only

USI believes that individual registration would give more protection to electors, meaning only they themselves could register, edit, amend or delete their inclusion in the register of electors. As it stands, someone in a household could make amendments to other electors' details on the register without their permission.

USI has also seen inconsistent processing features of each local authority. For example, on the RFA form, it requests the applicant to enter details for each member of the household eligible to vote. If the applicant only enters their own details, some local authorities have been known to remove other eligible voters in the household from the register..

Key proposal No. 5: Enabling a single national register database with unique identifiers

USI believes one national database with standard processes would improve the registration process for both electors and staff in the local authorities.

Currently, through USI voter registration campaigns, we have found different processes happening among different local authorities. This may include but is not limited to different deadlines for accepting forms, some accepting forms from students' unions in bulk while others will not and some accepting the single RFA forms past the deadline of October 31st. This causes confusion and errors when students expect another local authority to operate in the same fashion as others but are then told they do not.

Comments on Other Proposals Being Considered .

USI would welcome provisional registration for young people ages 16-17, with it becoming automatically active upon their 18th birthday as we believe this would increase participation among young voters and increase registrations if done in a school setting. Registration in formal settings, such as the USI voter registration campaigns that happen in college campuses have proven hugely successful, particularly among first year students during induction periods.

However, USI holds the position to support and advocate a national policy to extend voting rights to those after the age of sixteen. We believe that enfranchising the demographic of those between the ages of sixteen and eighteen to vote will not only encourage those to be active citizens but introduces a capable and able age demographic to play their part in the democratic process and are appreciated in doing so.

Currently, countries such as Argentina, Cuba, Ecuador, Nicaragua, Brazil, Malta, Bosnia, Serbia and Montenegro, Austria, Switzerland, Scotland and half the regions of Germany are all extending voting rights at 16. After enacting voting rights to those aged 16-18, countries such as Austria and Germany have reported that voter-turnout equals that of older age groups.

USI believes that no person without a home should lose their right to vote and be active participants in society as a result of the housing and homelessness crisis and therefore supports a specific provision for people with no fixed address to be able to vote.

USI supports the provision for anonymous registration for people whose safety may be at risk if their details are public on the register, e.g. where court ordered protections exist in order to ensure those who need protection are not disenfranchised.

USI supports the removal of provision for the edited register. This caused great confusion as to what it was but when explained to students, the majority of students registering spoke about how they did not want to be contacted for other reasons.

Other Recommendations of the USI

Automatic Voter Registration

USI believes that Automatic Voter Registration at the age of eligibility should be undertaken by the Government and the Department for Housing, Planning and Local Government.

Automatic Voter Registration at the age of eligibility would go a long way to encouraging younger people to exercise their franchise in Ireland.

An opt-out could be offered for those who do not wish their details to be included. Automatic Voter Registration has been proven to improve turnout and has done so in Germany, Finland, Israel, Italy, Switzerland and Chile. In the United Kingdom, registration is a duty – it is an offence not to provide an electoral registration officer with information – but enforcement is not strict.

USI recommends the Minister and Department for Housing, Planning and Local Government launch a feasibility study into this practice and its achievability in Ireland.

Online Mapping of Polling Stations and Electoral Districts

USI recommends that an online facility be set up by the Department for Housing, Planning and Local Government to identify the geographic location of polling stations for electoral districts.

Voting Rights for Citizens Abroad

USI, as the national advocacy organisation for students and key stakeholders in the role of young people in Ireland, has seen droves of young people leave Ireland in recent due to emigration and seeking opportunities abroad. We believe while they have left, many of those who have left have the desire to play a role in their native state and a country they may wish to return to.

Notable campaigns such as #HometoVote and #GettheBoat2Vote during the 2015 marriage equality referendum only goes to highlight the efforts that the Irish abroad can make to play a part in their native country. USI notes that anyone who still claimed residency in Ireland within 18 months of emigration can still return home to vote and still retain those voting rights for 18 months, yet must return home to exercise this.

USI believes that voting at Irish embassies abroad should be made available.

Registered Irish voters overseas could be facilitated to vote at the Irish Embassy, or Consulate. There are currently 115 nations that facilitate voting for their citizens abroad in one form or another.

We recommend the Minister responsible for the Department for Housing, Planning and Local Government strongly consider implementing this in the lifetime of this Government.

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