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|--|---|--|--|--|
| Title: Overseas Electors Bill (OEB) IA No: CO 2008 RPC Reference No: N/A Lead department or agency: Cabinet Office Other departments or agencies: | Impact Assessment (IA) | | | |
| | Date: 16/09/2018 | | | |
| | Stage: Final | | | |
| | Source of intervention: Domestic | | | |
| | Type of measure: Secondary legislation | | | |
| | Contact for enquiries: will.naughton@cabinetoffice.gov.uk | | | |
| Summary: Intervention and Options | | | | RPC Opinion: RPC Opinion Status |

| Cost of Preferred (or more likely) Option | | | | |
|---|----------------------------|---|-------------------|-------------------------------|
| Total Net Present Value | Business Net Present Value | Net cost to business per year (EANDCB in 2014 prices) | One-In, Three-Out | Business Impact Target Status |
| -£8.8m | N/A | N/A | Not in scope | Not a regulatory provision |

What is the problem under consideration? Why is government intervention necessary?

The Government made a 2017 manifesto commitment to "legislate for votes for life for British overseas electors." This is achievable by scrapping the rule that limits the right of overseas electors to register to vote to 15 years after they last appeared on a register of electors in the UK. Legislation is necessary to amend the UK parliamentary franchise, and is therefore needed to fulfil the commitment to having a lifelong right to vote.

What are the policy objectives and the intended effects?

The primary objectives of the OEB are to give all British citizens with a connection to the UK a lifelong right to vote in UK Parliamentary elections and to ensure that all eligible overseas electors are able to register to vote, and to renew their registration, in a convenient and timely fashion, while maintaining the integrity of the electoral register and guarding against fraud. The intended effects of the OEB are to increase the number of overseas citizens who are enfranchised and who are registered to vote.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Option 1: Do Nothing
Option 2: The Overseas Electors Bill (OEB)
Preferred Option: Option 2 (OEB) - This option will enfranchise British citizens overseas who have lived abroad for over 15 years, or who were not registered when living in the UK. It retains the majority of the existing electoral registration, renewal, and voting processes but makes them simpler and quicker where possible. It has been identified as the only option which fulfills the Government's commitment to expand the franchise, but appropriately limits eligibility to those with a discernible connection to the UK. It also introduces improvements to the processes of overseas registration and renewal, making them more convenient for electors and more efficient for administrators.

| | | | | |
|--|--|--|-----------------------|---------------------------|
| Will the policy be reviewed? It will not be reviewed. If applicable, set review date: Month/Year | | | | |
| Does implementation go beyond minimum EU requirements? | | | N/A | |
| Are any of these organisations in scope? | | | Micro No | Small No |
| | | | Medium No | Large No |
| What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent) | | | Traded: N/A | Non-traded: N/A |

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible SELECT SIGNATORY: _____ Date: _____

Summary: Analysis & Evidence

Policy Option 1

Description: Do Nothing

FULL ECONOMIC ASSESSMENT

| | | | | | |
|--------------------|-----------------|-------------------------|---------------------------------------|----------------|--------------------|
| Price Base 2017 | PV Base 2020 | Time Period Years 10 | Net Benefit (Present Value (PV)) (£m) | | |
| | | | Low: Optional | High: Optional | Best Estimate: N/A |

| COSTS (£m) | Total Transition (Constant Price) | Years | Average Annual (excl. Transition) (Constant Price) | Total Cost (Present Value) |
|---------------|--------------------------------------|-------|---|-------------------------------|
| Low | N/A | N/A | N/A | N/A |
| High | N/A | | N/A | |
| Best Estimate | N/A | | N/A | |

Description and scale of key monetised costs by 'main affected groups'

In line with impact assessment guidance, the Do Nothing option has zero costs or benefits as impacts are assessed as marginal changes against the Do Nothing baseline. While Electoral Registration Officers (EROs) in Local Authorities (LAs) face costs to process both applications and renewals from overseas electors and central government incurs costs to administer the conduct of polls for these electors, these costs are set to zero here for the purpose of comparison with the other option.

Other key non-monetised costs by 'main affected groups'

As above, the Do Nothing option has no specified costs or benefits as it is used as the baseline against which the impact of the other policy option is measured.

| BENEFITS (£m) | Total (Constant Price) | Transition Years | Average (excl. Transition) (Constant Price) | Annual (Constant Price) | Total (Present Value) | Benefit |
|---------------|---------------------------|---------------------|--|----------------------------|--------------------------|---------|
| Low | N/A | N/A | N/A | | N/A | |
| High | N/A | | N/A | | N/A | |
| Best Estimate | N/A | | N/A | | N/A | |

Description and scale of key monetised benefits by 'main affected groups'

As this option represents the status quo and acts as a baseline for comparison with the other option, there is no additional benefit to be considered here. In any case, the benefits of the franchise are not monetisable; the benefit is the right to vote for overseas citizens and as such does not carry a monetary value.

Other key non-monetised benefits by 'main affected groups'

As above, this option represents the status quo and so there is no additional benefit to be considered here. In any case, the non-monetised benefits of this option are that British citizens who move overseas have the right to vote in polls using the UK parliamentary franchise for 15 years from their last registration to vote while residing in the UK.

Key assumptions/sensitivities/risks

Discount rate

3.5%

Estimates of costs faced by Electoral Registration Officers (EROs) are based on survey feedback. When forecasting year-on-year growth in overseas registrations, we use trends based on registration and renewal data from 1991 to 2015. We omit recent years, as registration growth has not been reflective of normal electoral cycles. We base our assumptions for the proportion of eligible overseas electors that register to vote on the proportion of eligible overseas citizens registered to vote currently and over previous years.

BUSINESS ASSESSMENT (Option 1)

| | | | |
|---|---------------|----------|---|
| Direct impact on business (Equivalent Annual) £m: | | | Score for Business Impact Target (qualifying provisions only) £m: |
| Costs: N/A | Benefits: N/A | Net: N/A | |
| | | | N/A |

Summary: Analysis & Evidence

Policy Option 2

Description: Option 2

FULL ECONOMIC ASSESSMENT

| | | | | | |
|--------------------|-----------------|-------------------------|---------------------------------------|---------------|-----------------------|
| Price Base 2017 | PV Base 2020 | Time Period Years 10 | Net Benefit (Present Value (PV)) (£m) | | |
| | | | Low: -£3.3m | High: -£14.8m | Best Estimate: -£8.8m |

| COSTS (£m) | Total Transition (Constant Price) | Years | Average Annual (excl. Transition) (Constant Price) | Total Cost (Present Value) |
|---------------|--------------------------------------|-------|---|-------------------------------|
| Low | £0.9m | 2 | £0.3m | £3.3m |
| High | £0.9m | | £1.8m | £14.8m |
| Best Estimate | £0.9m | | £1m | £8.8m |

Description and scale of key monetised costs by 'main affected groups'

This will enfranchise potential electors who have not appeared on an electoral register in the UK in the last 15 years i.e. those who emigrated more than 15 years ago or who were never registered. Due to changes to the system, the unit cost EROs face to process applications to register to vote overseas is greater, but lower for the sending of renewal reminders and completing renewals. The expected increase in applications to register will result in an increase in overall additional costs. Central government will face up-front implementation costs for IT changes, and in the administering of polls.

Other key non-monetised costs by 'main affected groups'

Overseas electors face minor costs to make applications to register and annual renewals of registration. Central government may incur further costs for communications campaigns, as will the Electoral Commission to make newly eligible electors aware of their rights. No estimates of these costs are available at this stage, as plans have not been confirmed.

| BENEFITS (£m) | Total (Constant Price) | Transition Years | Average (excl. Transition) (Constant Price) | Annual (Constant Price) | Total (Present Value) | Benefit |
|---------------|---------------------------|---------------------|--|----------------------------|--------------------------|---------|
| Low | N/A | N/A | N/A | | N/A | |
| High | N/A | | N/A | | N/A | |
| Best Estimate | N/A | | N/A | | N/A | |

Description and scale of key monetised benefits by 'main affected groups'

Due to the changes to the system, the unit cost incurred by EROs in processing registrations for applicants who have been on a UK electoral register in the last 15 years will decrease. In addition, the cost of sending renewal reminders and of completing renewals will decrease. Individually, EROs will see these lower costs. However, due to the large expected increase in electors, we do not expect these total savings to outweigh the total costs.

Other key non-monetised benefits by 'main affected groups'

British emigrants that last appeared on an electoral register more than fifteen years ago will be eligible to vote in British Parliamentary elections and some referendums. This right is of fundamental democratic importance and therefore carries a value itself, which cannot be monetised. This fulfils the government's manifesto commitment entirely, and will strengthen a connection to the UK amongst British emigrants, supporting the UK's influence, cultural ties, and economic links globally.

Key assumptions/sensitivities/risks

Discount rate

3.5%

As of December 2017, a total of 225k eligible British emigrants are registered – significantly higher than in recent years, likely due to recent electoral events and the introduction of online registration. We estimate approximately 248k, 627k and 1m additional registrations in our low, central and high estimates respectively. This wide range reflects the level of uncertainty forecasting elector behaviour – particularly among newly enfranchised electors who have lived outside the UK for over 15 years.

BUSINESS ASSESSMENT (Option 2)

| | | | |
|---|---------------|----------|---|
| Direct impact on business (Equivalent Annual) £m: | | | Score for Business Impact Target (qualifying provisions only) £m: |
| Costs: N/A | Benefits: N/A | Net: N/A | |
| | | | N/A |

Introduction and background

Context: Current eligibility of overseas electors

1. The overseas franchise is limited to British citizens (as defined by the British Nationality Act 1981); no other types of British nationality (for example British National (Overseas), or British subject) are eligible. Currently, to be eligible as an overseas elector, a British citizen must have been registered to vote as a resident in the UK (or treated as resident for electoral registration purposes) within the last 15 years. An exception is made if the applicant was too young to have been registered to vote when they left the UK. In this case, as long as they left the UK no more than fifteen years ago, they can register at the UK address at which a parent or guardian was last registered.

Historical context

2. The overseas franchise was created by the Representation of the People Act 1985, which enabled British citizens resident abroad to vote in UK elections, but set a limit of 5 years from the date of having last been on an electoral register in the UK. This limit was extended in 1989 to 20 years in an attempt to increase the numbers registering as overseas electors, and then reduced in 2000 to the current limit of 15 years.

Current overseas registration and voting

3. To register to vote, an overseas applicant must submit an application to register and a declaration, which are combined in one form. The form must be submitted to the Electoral Registration Officer (ERO) for the Local Authority (LA) in which the applicant's UK registration address is located. Applications can be made online at www.gov.uk/register-to-vote, using a paper form, or, where an ERO allows it, by telephone or in person. Currently, applications in Northern Ireland must be made on paper.
4. Once an application has been submitted, the ERO will check the details and decide whether the applicant is entitled to be registered. The applicant's identity is verified in the same way as any domestically resident applicant, using their National Insurance number and date of birth. Overseas applicants whose identity cannot be verified using their National Insurance number are asked to provide an attestation, in which a registered elector makes a sworn statement confirming the applicant's identity.
5. The applicant's previous registration at the address at which they are applying to be an overseas elector must also be verified. This is done through ERO checks of previous electoral registers, which are kept for at least 15 years for this purpose. Registers are increasingly being stored digitally, rather than as paper archives, however initial reports suggest the majority of LAs still have at least some registers from the last 15 years stored as paper, including off-site in local archives.
6. If their application is successful, an overseas elector is added to the UK Parliamentary register, which is used for UK Parliamentary elections and possibly for referendums. Overseas electors are not eligible to vote in local government elections or any other elections that use the local government electoral register, such as elections to the Scottish Parliament or National Assembly for Wales.
7. An overseas elector's registration is valid for 12 months, after which their registration will lapse unless they have submitted a renewal confirming they are still entitled to be registered. EROs contact overseas electors when their registration is near to expiry, reminding them to renew. Renewals are necessary to maintain the accuracy of the electoral register in respect of those living abroad, as the annual canvass of all GB households does not cover these electors.
8. Overseas electors can cast their vote in the same way as any other elector - in person at their assigned polling station (if they are in the UK on the date of a poll), by post, or by proxy (appointing someone to vote on their behalf). Being an overseas elector is one of the qualifying reasons for an

elector to be granted a proxy vote. To register for a postal or proxy vote, electors must complete a further application form following their registration.

The OEB: Rationale and Objectives

Manifesto commitment

9. In its 2017 manifesto, the Government committed to “legislate for votes for life for British overseas electors”. This repeated a commitment made in the 2015 manifesto. In 2016 the Government published a policy statement setting out its proposed approach to delivering votes for life and sought feedback from expats and electoral administrators.

Objectives

10. The policy objectives are to expand the franchise to include more British citizens who move overseas, while ensuring that eligibility continues to involve a meaningful connection to the UK, and to remove the current time limit to overseas electors’ eligibility. The Government specifically committed to making the right to vote a life-long right for overseas citizens in its 2015 and 2017 manifestos.
11. The Government’s vision for electoral registration is a system in which electors are able to register and renew their registration in a convenient and timely fashion, while maintaining the integrity of the electoral register and guarding against fraud. The chosen policy must be in keeping with this vision.

Intended impacts of the policy

12. Primarily, the policy’s intended impact is to enable and increase democratic participation in UK political life by British citizens living abroad. This will be demonstrated by an increased number of British citizens eligible to vote and an increased number of registered overseas electors.

Policy Rationale

13. Underlying the UK franchise is a general principle that we should not deprive a British citizen of their right to vote unless there is a persuasive reason to do so. The Government does not view simply living overseas as sufficient justification for removing the right to vote, however does recognise having no tangible connection to the UK, or having never experienced life in the UK, as constituting such a reason.
14. The Government’s view is that a reasonably substantial degree of connection with the UK is necessary in order to justify being enfranchised to participate in the country’s democratic process. In order to preserve the democratic principle that those affected by an electoral decision are those who (collectively) make that decision, there must always be some limit to the people who are enfranchised. This limit is defined by a person’s connection to the UK.
15. Since 1985 the UK franchise has recognised that citizens who live overseas can have a connection to the UK that affords them the right to vote in UK elections. The original rationale for restrictions on the duration of eligibility was that with time overseas an elector’s connection with the UK was likely to diminish. In 2018, however, this is no longer the case; it is now possible to maintain a connection to the UK indefinitely, and from virtually anywhere in the world. Modern technology enables British citizens living overseas to maintain a full range of relations with the UK – personal, civic, business – without periodically returning to live in the country. For instance, the Internet delivers video calls to the UK free of charge, as well as emails and online news content. Social media enables people across the world to communicate instantaneously. Travel to the UK has not only become a cheaper prospect, but an easier one – for example, the number of air routes between European airports and London more than quadrupled between 1986 and 2015.

16. British citizens overseas also may be affected by the outcomes of national polls. For example, pensions received by citizens while they are overseas may be affected by the policies of the UK government, or any changes to relations between the UK and foreign countries may affect overseas citizens, e.g., their ability to travel, reside and work there.
17. The Government's position, reflected in the manifesto commitment, is that overseas citizens' voting rights should not be time-limited when their stake in national polls, as well as their knowledge of the issues involved, is likely to persist indefinitely. In this context, the 15-year restriction on eligibility is no longer desirable - rather, the right to vote should be conferred for life on those eligible. Indeed, the UK is one of a small and diminishing group of countries that currently time limit overseas voting rights in this way.
18. As well as addressing the duration of connection to the UK, the objective of adding more overseas citizens to the register also addresses the question of what is the most appropriate form of connection to the UK, and therefore basis of the right to vote. This impact assessment considers two options for the franchise that present different versions of how connection is best established.

Policy Options

- **Option 1, the Do Nothing option**, maintains the status quo, that the appropriate level of connection to the UK is defined by citizenship and having been registered to vote as a domestic elector in the last 15 years.
 - **Option 2, the OEB** (preferred option), is based on the view that citizenship and having lived in the UK (or treated as resident for registration purposes) is the best definition of this connection. The OEB will also introduce accompanying changes to the registration and renewal processes.
19. For electoral administrators to be able to discern and verify an elector's eligibility, any connection to the UK, which is a condition of being eligible, must be clear, well defined, and possible to evidence. Therefore, to serve as a workable basis of entitlement to vote, connection to the UK needs to be aligned to a metric that can be clearly defined and verified with evidence. Otherwise the process of electoral registration may become unfeasible, or open to electoral fraud.
 20. Any change to the electoral system, i.e. the voting system, in the UK is not in scope of the policy objective, and the Government's view is that the current electoral system should not be affected by changes to enfranchise overseas voters. In order to allow overseas electors to continue to participate in the UK electoral system as it stands, with electors voting in constituencies, an elector's connection to the UK needs to be a connection to a particular location in the UK. This location is practically defined as an address, as all addresses are clearly assigned to a constituency, and for domestic electors their connection is established by residency at an address.

Non-legislative options

21. Since the franchise for overseas electors is set out in primary legislation, it would be impossible to fulfil the manifesto commitment, specifically "scrapping the rule that bars British citizens who have lived abroad for more than 15 years from voting", without legislation. Non-legislative options, such as minor changes to registration practice or campaigns to promote registration, could only encourage, or make it easier, for those currently eligible to register to vote to do so.

Consultation

22. The Government consulted a variety of stakeholders. The following provided feedback:
 - Association of Electoral Administrators (AEA), Babergh and Mid Suffolk District Councils, Canterbury City Council, Eastbourne Borough Council, Gravesham Borough Council, Hertsmere Borough Council, London Borough of Hounslow, London Borough of Wandsworth, Runnymede Borough Council, Scottish Assessors Association (SAA), Selby District Council, Sheffield City Council, Society of Local Authority Chief Executives (SOLACE), The Electoral Commission (EC), Watford Borough Council, Wiltshire Council and 248 members of the general public, mostly expats.

23. As to the process, the Government published a policy statement, setting out plans for how it was going to scrap the 15-year limit on 7 October 2016. Stakeholders were invited to give feedback on that policy statement in response to this. All the applicants listed above (bar SOLACE) sent responses.
24. In December 2017, a second round of consultation was held unofficially on the subject of renewals. For this the EC, AEA, SAA, SOLACE and Electoral Management Board (EMB) for Scotland were contacted. All except EMB responded.

Option 1: Do Nothing

25. The first option would be to not effect any change. This would leave the overseas franchise as it currently is. In the absence of legislative change addressing the overseas franchise, we assume that no other changes to the processes of overseas registration, or renewal of registration would occur – these other changes would need to be made in primary legislation, and we anticipate that they are not on their own sufficient to justify a standalone Bill.

Key assumptions and risks

Number of overseas electors

26. The number of people expected to apply to register overseas, and to renew those registrations, is crucial to the estimation of costs. Data on the number of British citizens who live overseas are approximate. For the figures relating to living British emigrants we use most recent Long Term International Migration (LTIM) data and national life tables, both from the ONS, to estimate that 4.9m Britons currently live overseas.
27. We estimate that there are currently 1.5m overseas British citizens who left within the last 15 years, 1.4m of which are eligible to register to vote. This has been estimated using the aforementioned ONS data (more details can be found in Annex C). As of December 2017, there were 225k registered overseas electors (ONS data sent internally to Cabinet Office and National Records of Scotland) accounting for 16% of those eligible that left within the last 15 years.
28. There will be fluctuation in the number of registered electors, increasing during and prior to election years and decreasing during and after non-election years, as evidenced by historical data from both the House of Commons and ONS. This fluctuation has been forecast using data on the number of registered overseas electors from 1991 to 2015 to calculate average year-on-year changes in election, pre-election, post-election, and non-election years.

Option 1: Costs

29. The primary on-going costs of the inclusion of overseas electors in the franchise are the costs of the registration and renewal processes, incurred by Electoral Registration Officers (EROs) and applicants/electors, and the costs of registered overseas electors being included in the electorate when relevant polls are conducted, incurred by central government.
30. All costs, their underlying assumptions (including minor ones), and their sources are listed in full in annex C; year on year cost breakdowns for both policy options are provided in annex D.

Registration costs

31. **ERO costs:** As is the case for the registration of any elector, the ERO for the address used for registration is responsible for processing an overseas elector's application and adding them to the electoral register if appropriate. This involves reading, checking, and processing application forms, querying items and requesting further evidence where necessary. As such, the costs involved are:
- Staff time for processing forms and evidence;
 - Printing of application forms if requested, letters to query or request evidence, letters to confirm the outcome of applications (decreasing with any use of email for correspondence);
 - Postage of all correspondence, increasing with rates for international postage (decreasing with use of email for correspondence).
32. All ERO electoral registration costs increase with the number of queries and issues there are with a registration, i.e. an application that cannot be verified using a National Insurance number and requires a request for identity attestation will incur greater costs across all three categories. In order to check an overseas applicant's previous registration, an ERO retains previous electoral registers for the last 15 years. We understand that EROs are already transferring to digital storage of past registers, due to the increased ease and speed of accessing the data they hold, and assume all would do so in the absence of any change to the overseas electorate. While storing the electoral register securely has a cost attached, we expect this to mostly be a fixed cost, only varying slightly

with the number of electors registered. The time, and therefore cost, involved in processing applications that require previous registers to be checked will be considerably reduced if the registers in question are held digitally.

33. Applicant costs: Anyone applying to register as an overseas elector must provide all the information required in an application and in a declaration. This involves:

- Time spent applying and finding both details and evidence if needed. These are higher if an elector requests a form from their ERO rather than applying online. As for the ERO costs, elector costs will increase with the number of queries and further evidence needed to complete their application.
- Cost of postage, and possibly printing, if chosen to fill out a paper form or to download their own (removed with the use of the online application system).

34. Estimating the monetary value of these costs would require estimates of the amount of time needed by a range of electors to make an application, and the value of their time, which cannot be known. We have not attempted to monetise these costs here as we assume that all electors who make an application to register to vote will have felt they gained a benefit from registering which outweighed any cost they incurred. The key concern with regard to electors is that they can register to vote, and cast their vote, in a convenient and easily accessible way, i.e. that any time or cost involved is not prohibitive, a requirement which has been considered for all options in this assessment.

35. Central costs: The Individual Electoral Registration Digital Service (IER-DS) is a central government-run service that allows electors to apply to register online, and then sends these applications on to the appropriate ERO. It also sends identifiers from those applications to be matched against data held by DWP, and sends the match result to the ERO. There is no charge to the ERO or the applicant for applications made via the online system; any costs are borne centrally. However, the Digital Service is already set up for online registration for almost all electors, including overseas, and while it of course has some running costs, the cost of an additional application using this system is considered to be negligible. Given overseas applications account for a very small proportion of the overall number of applications processed, and that this system would remain in place even if overseas electors did not use it, we do not consider there to be any substantive cost of this system attributable to overseas electors.

Renewal costs

36. ERO costs: EROs send up to 2 renewal reminders to every registered overseas elector each year and process any returned renewals, including any checks or queries as necessary.

- The types of cost incurred are therefore the same as those in the registration process: staff time, printing, and postage - it is not currently possible to renew online.
- Costs will decrease with increased use of email for reminders and other correspondence and fewer queries being necessary.

37. Elector costs: electors do not need to provide any details or evidence in addition to those already given for a registration, but otherwise their costs are also very similar, these have not been monetised for the same reasons.

- The types of cost are again time, printing and postage (if EROs email renewal forms and the elector chooses to return by post). If EROs increase their use of email for renewal reminders (a cost saving measure for EROs), this is likely to save electors' time and to therefore reduce costs.

Poll conduct costs

38. Central Government costs: While elections (and referendums) are organised and administered by returning officers (counting officers) within LAs and their staff at the local level, all reasonable expenses incurred in the running of the poll are paid for by central government, from the consolidated fund. There should therefore be no legitimate cost to LAs that is not passed on to central government in its entirety, e.g. claiming for the wage costs of staff time.

- Poll conduct costs cover the full range of items and activities necessary to run a poll in accordance with guidance from the Electoral Commission, e.g. costs of polling station venues, printing of ballot papers, counting staff time etc. Overseas electors will bring a higher conduct cost than other electors for any

items that are posted to electors, e.g. postal vote ballot papers, due to the greater cost of international postage. Otherwise, serving these electors at a poll will be very similar to other absent vote electors.

39. **Elector costs:** Registered electors choose whether to participate in polls and will only incur a cost if they make the choice to vote. If that choice is made, then, the value of doing so must outweigh any costs incurred, and so monetised estimates of these costs have not been calculated.
- Voting requires some time for all electors, whatever method of voting they choose, e.g. the time to instruct a proxy to vote on one's behalf, and that proxy's time to visit a polling station or send a proxy postal ballot.
 - Electors are not expected to travel to the UK to vote. All indications suggest that only a very small proportion of overseas electors would vote in person, and we assume their preference reveals that the cost of doing so must have been lower than that of voting by post (e.g. due to an existing visit to the UK).

Communications costs

40. There is currently no planned expenditure for communications to raise awareness amongst overseas electors of their existing right to vote from central government. Some work may be expected from the Electoral Commission prior to polls.

Embassy costs

41. British embassies do not have any direct role in registering electors or enabling them to cast votes; British electors are not able to vote at embassies. There should be no reason for electors to visit embassies or for embassies to incur significant costs linked to electoral registration or polls being held. Even so, they will likely offer advice to overseas citizens on questions of eligibility to vote for example. However we do not consider this time cost to be directly attributable to prevailing policies regarding overseas electors. For example, if no overseas citizens were eligible to vote there would still likely be enquiries from overseas citizens on their electoral position.

Summary of Monetised Costs: Option 1 - Do Nothing

42. All costs, their underlying assumptions (including minor ones), and their sources are listed in full in annex C; year on year cost breakdowns for both policy options are provided in annex D.
43. Table 1 in Annex D provides a detailed summary of the estimated costs of Option 1 and Option 2. Option 1 represents the status quo; as such, none of these costs are additional and are treated as a baseline for comparison with other options. The cost estimates for Option 1 represent that baseline and are used to quantify the additional costs brought by Option 2 to change the overseas franchise. These costs will be borne by central government or by LAs, and so any additional costs will fall under the remit of the New Burdens doctrine (relevant to the other options which change the status quo).
- For the estimates of costs, we assume that by 2022 there would be approximately 170k overseas electors registered in the run-up to the expected general election. Note that these costs are inflated and discounted in line with HMT Green Book guidance.

Option 1: Benefits

Policy objectives

44. This option does not fulfil the Government's manifesto commitment: with the 15-year limit remaining, overseas citizens do not have a lifelong right to vote.
45. In the Government's view, democratic principles are best upheld by the franchise including all British citizens with a meaningful connection to the UK. This option does not reflect the view that citizens' connection to the UK is now lifelong, or the Government's view that the appropriate level of connection to define eligibility does not depend on having been registered to vote as a domestic elector.

Additional benefits

46. This option only offers partial enfranchisement of overseas British citizens. Therefore the additional benefits associated with a larger franchise are only partially delivered by this option. The right to vote of the 1.4m overseas citizens currently eligible will be maintained, therefore allowing them to participate in elections which may affect them while they are abroad (e.g. tax policies) and if and when they return to the UK (e.g. health policy). The right to vote gives those enfranchised the ability to participate in decision-making that may affect them. The mandate flowing from electoral outcomes is often perceived to be linked to how complete the representation of those affected was, e.g. as shown by concerns on turnout. Therefore as far as the outcome of polls may affect overseas citizens, this option offers support to the resulting mandate from an overseas perspective, only as far as it offers representation to overseas citizens, i.e. partially.
47. To the extent that a continuing connection to the UK is maintained and encouraged by having the right to vote, we would expect this option to only support that connection amongst 28% of adult British citizens who have emigrated (1.4m eligible of 4.9m total overseas). This will similarly limit the impact on any benefits that are linked to maintaining a connection to the UK amongst emigrants, for example helping to promote British tourism, business links, and the cultural influence of the UK - especially as far as this is linked to interest in and engagement with British politics.
48. Being registered to vote also makes people eligible to donate to UK political parties. Therefore, citizens overseas who are engaged in British politics are given the opportunity to demonstrate their support for political causes in this manner, to the extent that they are enfranchised by this option.

Net Present Value

49. In line with Impact Assessment guidance, the costs and benefits of the Do Nothing option were set to zero to assess marginal changes of Option 2 against the Do Nothing baseline. There are no monetised benefits associated with the Do Nothing option.

Reasons for rejection

50. This option would not fulfil the Government's commitment to extend the democratic right to vote to British citizens living overseas, and would not end the time limit on those rights. Therefore, the majority of British citizens living abroad would remain unable to vote and would continue to be prevented from participating in UK political life.
51. Under this option some citizens would continue to be ineligible to vote due to the specifics of their circumstances, but which do not represent significant reasons to be denied this right. For example, overseas citizens who left the UK when they were under 18 will not be able to register to vote if their parents were not on the electoral register as domestic electors, whereas those whose parents were will be eligible - the Government does not consider the choice of someone's parents as an appropriate reason to restrict voting rights. Any option which continues to base eligibility on whether someone was previously registered as a domestic elector will similarly mean there inappropriate exceptions to the enfranchisement of overseas citizens, and as such are not acceptable to the Government.

Option 2: The Overseas Electors Bill (OEB) - Preferred Option

52. The Overseas Electors Bill (OEB) will make two key changes to the franchise:

- Any overseas British citizen who was previously resident in the UK but not registered to vote as a domestic elector will be eligible to register as an overseas elector;
- Overseas electors who were last registered to vote in the UK over 15 years ago will be eligible to register. Therefore, we expect that the Bill will significantly increase the number of those who are registered to vote.

Accompanying changes to registration and renewal

53. Apart from the franchise changes above, the current system of electoral registration for overseas electors (as described under Option 1) will broadly be retained under the OEB. However, we propose a number of accompanying changes to the registration system to enable the franchise changes to be implemented. These changes will be introduced in conjunction with the OEB to make overseas electoral registration and renewal simpler, quicker, and more in-line with the modernised system of individual electoral registration. They include:

- The amount of information an elector needs to supply in a renewal of registration will be reduced to only relevant information (see Annex B for details)
- An online system for renewals will be introduced to allow electors to renew their registration online, and to give EROs a more streamlined system for processing renewals;
- Email will be recommended as an appropriate method of communication between the ERO and the elector;
- Information on the application to register will be modified to reassure electors that their email address will only be used for registration and renewal purposes, and to make them aware of the potential advantages of providing an email address (quicker registrations and renewals, and maintenance of ERO communications if they move house);
- There will be a slight change to the identity verification process to allow electors to use a passport or other documentary evidence to prove their identity if it cannot be verified using a National Insurance number. The identity attestation would be available for those with no suitable documentary evidence.

54. The changes above are not strictly necessary for the implementation of changes to the franchise, however they are expected to make overseas electoral registration and the introduction of legislative changes significantly less onerous for both EROs and electors. As such, these changes will be recommended and implemented alongside the OEB (in primary and secondary legislation, and in guidance, as appropriate). This impact assessment assumes they will occur simultaneously with legislative changes to the franchise under the OEB.

Changes to the registration process

55. There will be changes to the processes undertaken by an administrator once an overseas application is received. Verification of the address an elector is registering at (in the UK) will be substantially more complex for newly eligible electors than for those currently eligible.

56. All those currently eligible have their connection to their registration address verified through a check of the electoral register for the year in which they were last registered. However, those newly eligible were either never registered to vote or were last registered over 15 years ago and so the ERO is unlikely to hold the relevant register. To enable these electors to demonstrate a connection with the address at which they are registering the ERO will be able to check other local data that may be held (e.g. council tax records). Otherwise, the ERO will request documentary evidence that the applicant was previously resident at that address, or, if the applicant is not able to provide this, an attestation to this effect.

Change to application/declaration information

57. In order to allow newly eligible electors to register via the process outlined above, the OEB will make changes to the application requirements for an overseas applicant. This will mean a change to the information asked for as part of the overseas online application journey, and a change to

what information is passed electronically to the local authority for determination of the application. It will also require a change to the application form designed by the Electoral Commission. The information currently required at application, and the proposed changes to this, are outlined in Annex A.

Key assumptions, risks and sensitivity analysis

58. All costs, their underlying assumptions (including minor ones), and their sources are listed in full in annex C; year on year cost breakdowns for both policy options are provided in annex D.

Sensitivity analysis has been conducted on the following two factors:

Proportion of newly enfranchised British emigrants that choose to register

59. The number of registered electors depends heavily on the number of newly enfranchised overseas electors who register to vote. Using the most recent LTIM and national life table data, our analysis has estimated that there is a total of 4.9m British nationals overseas who would be eligible to register to vote following a change in policy (Option 2), in line with UN estimates. Of this total, we estimate that 1.4m are currently eligible to vote, and that a further 3.5m will be newly enfranchised following the introduction of the OEB.
60. Given the high degree of uncertainty surrounding forecasts of the newly enfranchised overseas electors who will register to vote, sensitivity analysis has been conducted. At present, there are 225k registered overseas electors. We calculate that 16% of the currently eligible overseas electors are registered based on the latest registration data (ONS data and National Records of Scotland). This is substantially higher than in recent years; over the last 10 years to date, the average rate of registration is 5%. As such, we use this 10-year average as the basis of our low estimate for newly enfranchised electors, which yields an additional 193,000 electors. Our central estimate is based on an average of the last 3 years of registration rates (15%), which would lead to an additional 517,000 electors registering from the stock of newly enfranchised electors. This time frame is chosen as it measures the average rate of registration since the introduction of online registration. Our high estimate assumes that the proportion of newly enfranchised electors who will register to vote will be 50% higher than the current rate of registration, constituting 25% of the newly enfranchised and leading to an additional 873,000 overseas electors registering. The wide range reflects considerable uncertainty with forecasting elector behaviour – particularly considering the sharp increases in registration since 2015 and that those who are overseas are not subject to domestic advertising and communication campaigns. One should note that the number of new registrations does not directly correspond with the proportion of the total stock as the annual renewal system means that a proportion of registered electors drop off the register each year. Furthermore, these estimates do not reflect any additional Government activity to promote overseas registration that may be undertaken in the future.
61. We expect the additional electors to join over a period of three years following implementation. Specifically, we assume 40% to join in 2020, 30% in 2021, and 30% in 2022. The large increase in the additional stock of electors in 2020 is based on the expected impetus to do so immediately, given that many of these electors have not been able to vote overseas before. The increases in the following two years are substantial, in line with those years being pre-election and election years. Sensitivity analysis is not included on this pattern of registration due to the insignificant impact upon costs over a 10-year period.

Increase in registration rate among the stock of currently eligible electors

62. In addition to the forecast for additional registrations from newly enfranchised electors, we expect that changes to the registration and renewal system will incentivise already eligible electors to register to vote. We conduct sensitivity analysis on this assumption, taking values of 5%, 10% and 15% for our low, central and high estimates, which adds an additional 55k, 110k and 165k electors – over the 10-year period – respectively. A lower cost is applied to those already eligible electors due to the relative ease in processing an application to register from a citizen who has been on an electoral register in the UK in the last 15 years.

Further risks and assumptions

63. We expect the additional newly enfranchised electors to join over a period of three years following implementation: 40% in 2020, 30% in 2021, and 30% in 2022. The large increase in the additional stock of electors in 2020 is based on expected greater incentive to do so given that many of these electors have not been able to vote overseas before. While this assumption means that costs in the years following implementation will be considerably higher than in other years, it will not impact total costs over the 10-year period.
64. We cannot know with certainty how many overseas electors will wish to register following the OEB. It is important to note that regardless of the additional stock of electors, annual changes between election and non-election years in the number of citizens registered to vote have been calculated based on historical data. However, a surge in registration could occur in the future if an issue of particular interest to these electors arises. In this case, the number of electors could significantly vary, therefore significantly impacting costs.
65. There is a risk that the OEB and its associated expenditure may not result in a large number of newly eligible electors registering. This would potentially mean the OEB represents poor value for money per registration, however it would still achieve the key objective of permitting all those in this group to register should they choose to, a right which has a value in itself.
- Our expectation is that there will be a sufficient proportion of newly eligible overseas potential electors who exercise their right to register to vote to justify the change in policy, alongside the value of enfranchising newly eligible electors.
66. We have assumed a uniform rate of 65% for the post-OEB proportion of confirmations of application to register sent via email and proportion of renewals made via the online system. This means we expect that all those who receive a confirmation of application to register to carry on with the remainder of their correspondence via email and to process their renewals online. This is a sensitive assumption, and cannot be predicted with certainty. Currently, there is no guidance on the use of email, and renewing online is not possible; as such, proportions of email use differs for the type of correspondence. The assumption of an uplifted and uniform rate of 65% post-OEB is based, then, on the issuing of guidance to communicate via email and the ability to now renew a registration online.
67. Newly eligible electors can be encouraged to register by public awareness campaigns, e.g. conducted by the Government or the Electoral Commission, to ensure that all those abroad are informed of the change in their voting rights.
68. Another potential risk is that a very high proportion of those newly eligible register, far in excess of the estimates used here:
- One impact of this would be an increased cost burden for EROs who need to register the additional applicants. In the extreme, this could also have an adverse impact on the ability of EROs and returning officers (ROs) to perform their other duties, including the conduct and administration of a poll. In order to mitigate against this, and given the impossibility of accurately predicting registration rates for this new group, budgets will include contingency to be able to fund the processing of slightly more applications than we expect to be made. In the event of an extraordinary number of applications being made such that even this is not sufficient, we would seek emergency funding in order to support EROs in performing their duties.
69. Another, less quantifiable, impact would be that on the UK's democratic system. Those resident in the UK may feel that the increase in the overseas electorate, in their constituency or more broadly, is of a size which has a noticeable impact on the 'power' of their vote, decreasing the influence of those resident in the UK. While this is subjective, if overseas registrations are clustered in particular constituencies and of large enough numbers, the impact on the electorate may be felt to be significant. Given the registration rates of existing overseas eligible electors, and the profile of those currently registered, we judge this risk to be limited.
70. Finally, this option carries the risk that the necessary changes to the Digital Service and/or the EMS are not correctly implemented, either by one supplier or by several. This could potentially mean that while enfranchised in theory, those newly eligible would in practice find it difficult or impossible to register. This would carry potential reputational and legal risks, as well as straining the capacity of EROs to process applications.

- This risk is reduced by the experience of both the EMS suppliers and the Cabinet Office in managing and implementing previous changes of a similar nature but of a larger scale, with the introduction of Individual Electoral Registration. In addition to this, close engagement with suppliers, in order to assess the feasibility of the required changes, management of the changes as they are implemented, and ensuring time-scales are realistic, will further reduce this risk.

Monetised costs

71. All costs and benefits are considered in comparison to the costs and benefits of the Do Nothing option; impacts that also occur in the Do Nothing option are described in more detail there. For a detailed breakdown of year-on-year costs, please refer to Table 1 in Annex D.

Central Government costs of implementation

72. Changes to the online application system:

- Changes will need to be made to allow applications from newly eligible electors to be processed, since the user journey and the information collected will be different
- Changes will also be made to allow overseas electors to make their renewal as well as their application online through the Digital Service
- The Cabinet Office manages and funds the Digital Service and so the cost of any changes will be funded by Cabinet Office budgets. Current estimates are that costs will be approximately £145k, including user research and testing.

Electoral Management System (EMS) changes

73. EMS are the software systems used by EROs to process applications to register and to manage their electoral registers and elections. Each EMS connects to the IER Digital Service to receive all application information from applications made online. It also stores information on applications and electors, and uses this to produce the electoral register and any updates. The EMS also helps the electoral administrator manage the process for any elector, for example, it prompts them to request documentary evidence, or send a renewal reminder annually.

- Following the OEB, the EMS will need altering to be able to accept different application information from the Digital Service and to process overseas applicants differently once the application is received, for example conducting an evidential process regarding an applicant's previous address.
- Quotes from the suppliers of EMS will be sought in due course. Approximate (and undiscounted) estimates are that making the necessary changes will cost approximately £735k. This will allow applications from newly eligible electors to be processed and for online renewals to be processed using the EMS. It will also allow for data on how many newly eligible electors have applied and/or registered to be captured and reported.

Non-central Government implementation costs

74. Familiarisation costs: All parties affected by the change to the franchise will need to familiarise themselves with the changes and what they entail, i.e., reading and understanding the legislation and any accompanying guidance and determining what it means in practice. In particular, EROs will need to familiarise themselves with the new system in order to abide by it and address queries from electors. They will be assisted in this by Ministerial Guidance, advice produced by the Electoral Commission and, where they are members, guidance given by the Association of Electoral Administrators. To produce such guidance these bodies will first have to thoroughly understand the legislation and its implications.

- This process of familiarisation takes time: time that could be spent on other activities. As such it brings an opportunity cost equivalent to the value of the affected party's time. We expect that it will take, on average, 2 members of staff from each LA and Valuation Joint Board (VJB) 4 hours each to familiarise themselves with the changes resulting from the introduction of this Bill. This is estimated to be approximately £50k.

75. The Electoral Commission (EC) is expected to produce new advice on the process for electoral administrators, based on the legislation and accompanying Ministerial Guidance. The EC will also need to produce a new application form for overseas electors, and a new postal and proxy vote

application form. This will require some time to develop, but it is not likely to be significant as the changes required to existing forms will not be substantial. The costs of these changes are expected to be insignificant.

76. **Communications:** The Cabinet Office may run a communications campaign to raise awareness among overseas British citizens on their right to vote. However, no plans have been made as yet, as such, communications costs are not included in our monetised cost estimates. The Electoral Commission has a legal duty to make eligible potential electors aware of their rights and to promote democratic engagement. Adding to the franchise will increase the cost burden of this duty.

Registration costs

77. **Electoral Registration Officer (ERO) costs:** Funding is planned to be provided by central government to support the additional costs incurred by EROs under the OEB, in accordance with the New Burdens doctrine.

- The costs of registration will increase with the number of applications to register; therefore as new electors are enfranchised this cost is expected to increase. The unit costs of processing an application to register by a newly eligible British emigrant are expected to increase, due to the changes to the process involved.
- However, guidance to encourage the use of email should decrease the amount of postal correspondence and so decrease printing and postage costs associated with each application to register.
- The introduction of an easier, online renewal system is expected to increase the number of overseas electors who renew their registration, and reduce the number of re-applications to register (as many new registrations appear to be from electors with a lapsed, previous overseas registration).
- In the future, in order to verify the previous registration of applicants, EROs will need to retain electoral registers for a greater period of time than the current 15 years. Though the registers will be digitally retained in future, this will still have a cost attached - but due to differences between software systems and storage methods used by EROs, this cost is difficult to accurately establish. We do not expect this to bring a significant additional burden on EROs as we expect that they would be storing registers for 15 years digitally from now on anyway, and increasing the number of registers which they hold should not add a large cost to the existing cost of storing and securing such data. We will refine our expectation of data storage costs in line with any technical feedback.

78. **Applicant costs:** It may take an applicant longer to register under the OEB due to the evidence they will need to provide. However this is unlikely to be a significant increase. Guidance to encourage the use of email should decrease the amount of postal correspondence and so decrease postage costs.

- As more people are eligible to register following the OEB the total cost for applicants of submitting applications is expected to increase.

79. **Online application service:** Following the initial implementation costs, we do not expect there to be any additional on-going costs.

Renewal costs

80. **ERO costs:** Funding is planned to be provided by central government to support the additional costs incurred by EROs under the OEB, in accordance with the New Burdens doctrine.

- The average unit cost of sending a reminder to renew registration is expected to decrease as the use of email is encouraged. We expect a higher proportion of renewals to be sent online as a result, which will lower printing and postage costs incurred by EROs.
- The staff costs associated with processing registration renewals is expected to decrease significantly with the introduction of a system to allow electors to renew online. Less staff time is required to process online registration renewals, as the Electoral Management System (EMS) can transfer details automatically.
- The reduced information required as part of a renewal will mean that there is less information for an ERO to check and confirm. This will further reduce processing time. Option 2 will also remove confusion

around whether the identity of an overseas elector needs to be re-verified whenever they renew - it will establish conclusively that this is not the case.

- The total cost of sending renewal reminders and processing renewals will increase with the number of electors who are registered and who renew their registrations. As we expect an increase in the number of registered electors following the OEB this will increase the overall cost.

81. **Electoral costs:** The option to renew online will reduce the costs of renewing for those electors who choose to use it, removing any postage costs. It should also reduce the costs of those electors who would otherwise have let their registration lapse and then re-applied to register, but with the online system renew each year.

- However, as more electors are expected to be registered, and therefore to renew, the total cost will increase.

Poll conduct costs:

82. **Central Government costs:** These costs will remain the same and the cost of serving each elector is expected to be the same for those who are newly eligible as for those already registered under the existing system. The total costs of running a poll increases with the electorate registered at the time of the poll, and particularly with an increase in the number of postal voters, and overseas electors (due to the costs of sending postal vote packs, and the higher cost of posting internationally). Therefore with the expected increase in the number of registered overseas electors, and given they are more likely to be postal voters than electors resident in the UK, the total cost of conducting polls is expected to increase following implementation of the OEB. National polls are, at the time of writing, scheduled to be held in 2022/23 and 2027/28.

83. **Electoral costs:** These costs will remain the same for each registered elector following the implementation of the OEB, however the increase in the number of registered overseas electors will increase the total cost.

Cost to Business

84. The OEB has no direct impact on businesses. In order to implement the policy, a change to the current service, and further services, will be purchased from Electoral Management Software (EMS) suppliers, but the OEB does not regulate or impact their business beyond this.

Embassy costs

85. As in point 38, British embassies do not have any direct role in registering electors or enabling them to cast votes; British electors are not able to vote at embassies. There should be no reason for electors to visit embassies or for embassies to incur significant costs linked to electoral registration or polls being held. Even so, they will already likely offer advice to overseas citizens on questions of eligibility to vote for example. However we do not consider this time cost to be directly attributable to prevailing policies regarding overseas electors.

Summary of Monetised Costs: Option 2 – The OEB

86. All costs, their underlying assumptions (including minor ones), and their sources are listed in full in annex C.

87. Table 1 in Annex D gives a year-on-year summary of the estimated net financial costs relative to the baseline Option 1 (Do Nothing). All costs take account of inflation, and have been discounted in line with HMT Green Book guidance.

Option 2 - The OEB: Benefits

Fulfilling policy objectives

88. This option fulfils the Government's manifesto commitment: the OEB will give overseas citizens who have lived abroad for more than 15 years the right to vote. The OEB fulfils the Government's commitment to extend the democratic right to vote to all British citizens living overseas.
89. In the Government's view, democratic principles are best upheld by the franchise including all British citizens with a meaningful connection to the UK. This option reflects the view that citizens' connection to the UK is established by residency (or equivalent if registered as a non-resident domestic elector) and in the modern world, is lifelong.

Additional benefits

90. This option enfranchises all overseas British citizens who have previously lived in the UK. Therefore the additional benefits associated with a larger franchise are delivered on a greater scale by this option.
91. A significant number of citizens will be newly eligible to vote, and therefore given the opportunity to have a say on issues that might affect them.
92. Extending these democratic rights has potential benefits for the British state and economy, as it will ensure a lasting, stronger relationship between the state and those living abroad, thereby enhancing the global influence of the UK.
93. The accompanying changes to the system, which make registration and renewal easier for both EROs and potential electors, reduce the burden on these parties. As a result, the overall process of registering to vote overseas and renewing that registration will become more efficient.

Net Present Value

94. The present value of the central estimate for OEB, including implementation and 10 years of running the policy from 2020/21 onwards, is expected to be approximately: -£12.9m. The Net Present Value in comparison to the Do Nothing option is: -£8.8m.

Reasons for preference

95. This option would fulfil the Government's commitment to extend the democratic right to vote to British citizens living overseas to the full extent compatible with restricting the franchise to people with a significant connection to the UK. It would also end the time limit on those rights.
96. The majority of British citizens living abroad would be able to vote and able to participate in UK political life.
97. Implementing this option is feasible without undue strain on ERO or central government resources and incurs a moderate but proportionate cost.

Annex A: Changes to initial application to register under the OEB

There will be a small addition to the information collected in an application. An application will also need to include information on whether the applicant was registered or resident (one or the other) at the UK address at which they are applying to register. This is not currently collected as the applicant is required to assert that they were registered (only) at the UK address at which they are attempting to register.

The year in which the applicant left their UK address may also be over 15 years ago and they will still remain eligible.

Otherwise the initial application process will remain largely the same (as part of their application, the applicant will need to provide the following National Insurance number, name and date of birth will be sent for verification as currently (if provided), and the rest of the application information is passed straight to the ERO as currently):

| OEB Registration Requirement | Reason for this being a requirement | Is this a policy change? |
|---|--|---|
| i. Applicant's full name <i>For Northern Ireland (NI) the applicant's signature is also required.</i> | Needed for register entry | No |
| ii. Applicant's date of birth or, the reason why they are not able to provide this information, and a statement as to whether the applicant is under 18 years old <i>For NI the applicant must provide their date of birth</i> | Needed to determine eligibility and DWP match | Yes - no longer asking whether they are over 76 in England and Wales |
| iii. Applicant's NI number or the reason why they are unable to provide this information <i>For NI the applicant must provide their NI number or a statement that they do not have one</i> | Needed for DWP match process | No |
| iv. (Optional) Space for applicant to provide most recent previous name <i>This does not apply to NI</i> | Useful to increase chances of DWP match | No |
| v. Applicant previous name if changed since last registered or resident, and reason for change if so <i>This does not apply to NI</i> | Needed to associate applicant with their previous register entry or their documentary evidence | Yes - need to insert reference to residence |
| vi. Open register preference | Needed to remove applicant from open register or not | No |
| vii. Declaration of truth and awareness of penalty for provision of false information | Needed for trust of application | No |
| viii. Date of the application/declaration | Needed to determine relevant date | No |
| ix. That the applicant is a British citizen | Needed to determine eligibility | No |
| x. That the applicant is not resident in the UK | Needed to determine eligibility | No |
| xi. Which of the following addresses the applicant is registering in respect of, and the details of this address: A. The UK address at which they were last registered, or, B. The UK address at which they were last resident, or, C. The last UK address at which they would be eligible to register by means of a declaration of local connection, were they to be in the same situation in relation to that address now. | Needed to determine eligibility and assign constituency | Yes - a change (by adding B and C, as A was previously the only option) |

| | | |
|---|---|--|
| xii. An indication of when they left the address in xi and a statement that they have not been registered in the UK since | Needed to be able to check veracity of assertion that this is the last address and link to the correct previous registration etc | Yes - a change to what it's referring to |
| xiii. An address at which the applicant may be contacted | Needed for ERO to contact the applicant | No |
| xiv. A statement as to whether the applicant was or was not last registered as service elector, or using a declaration of local connection, or by virtue of being a merchant seaman | Needed for ERO to know which part of the previous register to check, and for the requirement below | Yes - edited |
| xv. If the applicant was last registered as a service elector or a merchant seaman, whether they were also ever resident at their last registration address | Needed in cases where the previous register is not available to determine whether ERO requires evidence of address connection or an attestation | Yes - new requirement |
| xvi. <i>(Optional) If last registered as a service elector or a merchant seaman and not resident at their last registration address, then:</i> <ul style="list-style-type: none"> • <i>If they were last registered as a member/spouse of a member of the armed forces, the service in which that member served, the rank or rating of that member, and the service number of that member</i> • <i>If they were last registered as a Crown servant/spouse of a Crown servant, the name of the Government department, a description of the post of that servant, and any staff number, payroll number or other similar identifying number of that employee</i> • <i>If they were last registered as a British council employee or spouse/civil partner of a British Council employee, a description of the post of that employee.</i> • <i>If they were last registered as a merchant seaman, a description of their employment (note that spouses/civil partners of merchant seamen are not eligible)</i> | Needed in cases where the previous register is not available - if provided will allow the ERO to not require an attestation of previous service from the applicant | Yes - new requirement |
| xvii. Passport details (number and date of issue) or further nationality details if do not have current British passport | Useful to allow for the possibility of security and nationality checking | Yes - remove place of issue (not useful) |
| xviii. If the applicant's last registration was as an overseas elector, then they must indicate this, and when they were last registered as an overseas elector | Useful if the ERO does not hold registers in which an applicant's 'original' ordinary registration appears, but does hold more recent register in which their previous overseas registration appears. | No |
| xix. <i>(Optional) The applicant's email address and telephone number This does not apply to NI.</i> | Useful to contact the applicant | No |

Annex B: Information required for a renewal under the OEB

An overseas renewal declaration must contain the information below. This is a reduction in the amount of information required. Currently, the all the information required in an application and declaration must be resupplied by the elector in order to renew.

1. Full name and date of birth of the elector (or a reason why they are not able to provide a DOB).
2. The date of the declaration.
3. That the elector is a British citizen.
4. That the elector is not resident in the UK on the date of the declaration.
5. The address they are registered as an overseas elector at, and, that they have not been registered to vote in the UK since their registration for this current overseas elector status.
6. That the elector believes the matters stated in the declaration to be true.

Annex C: Key assumptions

| Assumptions | Value | Source |
|--|---|---|
| 1. International postage cost | £1.17 | This is sourced from the Royal Mail International Standard 2017. It is the cost of international postage of a 10g letter. The majority of letters sent regarding overseas electors contain one page (two for a renewal reminder). |
| 2. Number of British citizens living overseas | 4.9m | Calculated from Long Term International Migration (LTIM) outflow data from November 2017. Mortality and ages are accounted for with the national life tables (September 2017). Both are the most recent ONS data. |
| 3. Percentage of British emigrants on the electoral register when living in the UK (level of completeness) | 85% | Electoral Commission (2016) report on the accuracy and completeness of electoral registers. |
| 4. Percentage of British emigrants who have lived overseas for less than 15 years | 31% | The total stock has been estimated using LTIM inflow and outflow data. This has been combined with long-term LTIM survey data of emigrants' intentions of returning to the UK, and with National Life tables to estimate the expected mortality rates of emigrants, to estimate the proportion of overseas electors who have left within the last 15 years. All this data is the most recent ONS data. |
| 5. Expected additional stock of newly enfranchised electors | Low: 193,000 (5%, 10-yr avg) Central: 517,000 (15%, 3-yr avg) High: 873,000 (25%, peak) | Low, central, and high estimates are based on the level of proportion of emigrants that we expect to actually register to vote. 16% of those who emigrated within the last 15 years were registered to vote in December 2017 (ONS data sent internally to Cabinet Office and National Records of Scotland). This is substantially higher than in recent years; over the last 10 years to date, the average rate of registration is 5%, which constitutes our low estimate of an additional 193,000 registrations. For our central estimate, we use the 3-year average (15%, 517,000 registrations) to reflect the average rate of registration since the introduction of online registration. For the high estimate, we forecast a 50% in the rate of registration among newly enfranchised electors, to 25% (873,000 registrations). This wide range is chosen to reflect the level of uncertainty surrounding forecasts of elector behaviour – particularly for those who reside outside of the UK. |
| 6. Expected additional stock of currently eligible electors | Low: 55,000 (5%) Central: 110,000 (10%) | We expect that the changes to the registration and renewal system will incentivise already eligible electors to register to vote. A lower cost is applied to those already eligible electors due to the relative ease in processing an application to register from a citizen who has been on an electoral register in the UK in the last 15 years. Our high estimate |

| | | |
|--|---|---|
| | High: 165,000 (15%) | assumes a 15% increase in the rate of registration among currently-enfranchised electors, resulting in an additional 165,000 electors over the 10-year period. The central estimate assumes a 10% increase, resulting in an additional 110,000 new electors; and our low estimate assumes a 5% increase, with 55,000 additional electors. |
| 7. Cost of processing an application to register a) Under the current system b) Post-OEB if registered less than 15 years ago c) Post-OEB if not previously registered less than 15 years ago 8. | a) Average: £3.82 b) Average: £3.23 c) Average: £6.36 | The costs depend on the nature of the application i.e. whether a national insurance number can be verified; evidence is required, or an attestation is needed. Costs are based on initial reports from EROs on the time it takes to process applications, and the proportion of correspondence conducted via email. Registrations of electors for whom a previous electoral register cannot be checked are more expensive due to the need to check evidence of a previous residency/registration. |
| 9. Percentage of electors whose identity is verified by a National Insurance number check a) Those who left less than 15 years ago Those who left more than 15 years ago | a) 95% b) 80% | Based on Individual Electoral Registration Digital Service (IERDS) data collected in December 2017. For those who left less than 15 years ago, this figure reflects the proportion of online overseas electors applications verified in the last years (IERDS data only became available three years ago). We assume that those who left longer ago will not be able to give as reliable a report of a National Insurance number, and that those who were not previously registered will include those who left as children, and who therefore may not have received a National Insurance number. |
| 10. Average ERO cost of issuing a reminder to renew an overseas registration a) Current system b) Post-OEB with the online renewal system | a) £1.29 b) £0.47 | The difference in these costs stems from the different proportions we assume to be sent via email (see below). Both costs are based on international postage rates and reports of printing costs. A renewal reminder is assumed, based on feedback, to contain two pages of documentation. |
| b) Percentage of renewal reminders sent via email | 33% | Feedback suggests that a low proportion (33%) of EROs specified that they sent renewal reminders via email. |
| 11. Average ERO cost of a completed renewal of overseas registration a) Current system b) Post-OEB with online renewals 12. | a) £1.52 b) £1.44 | Costs are based on postage, printing, and reports of processing time both currently and post-OEB. The reduction in cost post-OEB is due to the decreased costs of processing online renewals, the incidence of which is expected to increase significantly when made available (see below). |

| | | |
|--|---|---|
| 13. Percentage of renewals made using the online system | 65% | Survey feedback has shown that EROs have email addresses for approximately 90% of electors. However, at present, a relatively low proportion (33%) of renewal reminders are currently sent via email, as shown in Assumption 11 in this table. The introduction of an online system will make this more accessible to EROs, and as such, we expect this rate to approximately double. |
| 14. Cost of time to process a complete renewal a) Current system 2. Post-OEB with the online renewal system | a) £0.26 b) £0.13 | Costs are based on feedback on the time it takes to process registration forms. Multiplying these times by the wage per minute gives the resulting outputs. |
| 15. Percentage of confirmations of application to register sent via email a) Current system b) Post-OEB with the online renewal system b) | a) 50% b) 65% | This is based on initial reports from EROs of the proportion of confirmations of registration sent via email. The post-OEB uplift assumes that the same proportion of those who renew online is contacted via email. |
| Number of renewals | 90% of annual number registered | We assume that 90% of all registered in a given year have renewed their registration from the previous year, and that the remaining 10% are new registrations. |
| 16. Percentage of all those that renew that do so after the first reminder | 47% | Based on detailed Phase 5 Management Information data collected by Cabinet Office in 2015. |
| 17. Timing of entry of additional newly enfranchised stock of electors to the electoral register | 40% of additional stock in 2020, 30% in 2021 and 30% in 2022. | The large increase in the additional stock of electors in 2020 is based on greater incentive to do so given that many of these electors have not been able to vote overseas before. The increases in the following two years are still substantial, in line with those years being pre-election and election years. |
| 18. Average cost per overseas elector of conducting polls | £3.86 | This is based on the costs of administration per elector at recent polls and of international postage (accounted for those with a postal vote). |
| 19. Percentage of overseas electors registered for a postal vote | 68% | Assumes all overseas electors are registered for a voting method, and bases proportions of postal/proxy voting on initial reports from EROs. |
| 20. | | |

Annex D: Year-on-year cost breakdowns

All costs displayed here have been inflated and discounted in line with HMT Green Book guidance. Table 1 shows the year-on-year net additional costs for Option 2 over and above the 'Do Nothing' option.

Implementation costs: The sum of changes to the online application system, electoral management system, and the costs of familiarisation, split over two years.

Renewal costs: The sum of the cost incurred by EROs in sending renewal reminders and the cost incurred by EROs in completing renewals. All registered electors will receive a first renewal reminder and all those who failing to reply will receive a second.

Registration costs: Cost incurred by EROs to process an application to register to vote overseas.

Conduct cost: Cost incurred in the administering of polls.

Table 1: Year-on-year cost breakdowns (net, relative to baseline)

| | | Y1 2020/21 | Y2 2021/22 | Y3 2022/23 | Y4 2023/24 | Y5 2024/25 | Y6 2025/26 | Y7 2026/27 | Y8 2027/28 | Y9 2028/29 | Y10 2029/2030 | Total |
|-----------------|---------------------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|------------------|---------------|
| Option 2 (Low) | Implementation costs (£m) | £0.47 | £0.41 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.88 |
| | Renewal costs (£m) | £0.02 | £0.00 | £0.05 | £0.08 | £0.07 | £0.06 | £0.06 | £0.09 | £0.06 | £0.05 | £0.50 |
| | Registration costs (£m) | £0.03 | £0.10 | £0.22 | £0.24 | £0.20 | £0.17 | £0.18 | £0.26 | £0.17 | £0.14 | £1.71 |
| | Conduct costs (£m) | £0.00 | £0.00 | £0.48 | £0.00 | £0.00 | £0.00 | £0.00 | £0.72 | £0.00 | £0.00 | £1.19 |
| | Total costs (£m) | £0.52 | £0.50 | £0.65 | £0.16 | £0.13 | £0.11 | £0.12 | £0.88 | £0.11 | £0.09 | £3.27 |
| Option 2 (Best) | Implementation costs (£m) | £0.47 | £0.41 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.88 |
| | Renewal costs (£m) | £0.27 | £0.21 | £0.20 | £0.01 | £0.01 | £0.01 | £0.00 | £0.01 | £0.00 | £0.01 | £0.59 |
| | Registration costs (£m) | £0.11 | £0.30 | £0.64 | £0.66 | £0.55 | £0.47 | £0.49 | £0.73 | £0.47 | £0.39 | £4.81 |
| | Conduct costs (£m) | £0.00 | £0.00 | £1.25 | £0.00 | £0.00 | £0.00 | £0.00 | £1.26 | £0.00 | £0.00 | £2.51 |
| | Total costs (£m) | £0.85 | £0.91 | £2.08 | £0.64 | £0.54 | £0.46 | £0.48 | £1.98 | £0.45 | £0.38 | £8.78 |
| Option 2 (High) | Implementation costs (£m) | £0.47 | £0.41 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.00 | £0.88 |
| | Renewal costs (£m) | £0.55 | £0.44 | £0.46 | £0.06 | £0.05 | £0.04 | £0.05 | £0.06 | £0.04 | £0.04 | £1.78 |
| | Registration costs (£m) | £0.19 | £0.51 | £1.10 | £1.12 | £0.94 | £0.80 | £0.84 | £1.25 | £0.79 | £0.66 | £8.21 |
| | Conduct costs (£m) | £0.00 | £0.00 | £2.10 | £0.00 | £0.00 | £0.00 | £0.00 | £1.86 | £0.00 | £0.00 | £3.96 |
| | Total costs (£m) | £1.22 | £1.35 | £3.65 | £1.18 | £0.99 | £0.84 | £0.89 | £3.17 | £0.83 | £0.70 | £14.82 |