Consultation on the electoral administration and reform White Paper:
UK Democracy Fund response

**Our response**

This response is submitted by the UK Democracy Fund. The UK Democracy Fund (the Fund) is a pooled Fund set up by the Joseph Rowntree Reform Trust (JRRT) in the spring of 2019 and supported by a group of committed funders. The Fund is independent and non-partisan and works to build a healthy democracy – one in which everyone can participate and where political power is shared fairly.

The UK Democracy Fund has three broad goals:

> 1. Enabling everyone to vote. Building support for reforms to ensure a simple, seamless and accessible voting system fit for the 21st Century.

> 2. Extending the franchise. Advocating in support of expanding the franchise for 16 and 17 year-olds and settled UK residents from overseas.

> 3. Increasing participation of everyone in our elections. Making an effort to raise the turnout of low propensity voters to improve fairness in our democracy.

The work of the Fund includes making grants supporting approaches to encourage the participation of key under-represented populations in elections; commissioning research on reform of the electoral system and extension of the franchise; as well as building the evidence base for what works and disseminating learning.

Our response to this important consultation's focuses on areas that we have particular experience - including from supporting specific research, experimentation and activities in areas the consultation is seeking to understand.

**Our submission**

**1. To what extent do you agree or disagree with the six principles for electoral reform of equity, accessibility, participation, improving citizen experience, simplicity, integrity?**

**Fully agree**

Please explain your answer:

These principles are a valid articulation to express the need for a democratic system fit for the 21st century. Whilst there are a number of challenges facing our democracy, fundamentally we need to ensure that all eligible voters can participate in free and fair elections. There is a huge gap in democratic and electoral participation in the UK, meaning millions do not have any say over who represents them or the consequent decisions and policies that shape their lives. Those missing from the register are predominantly younger, more likely to have been born overseas, more likely to be from a minority ethnic community, are more likely to rent their home, and are more likely to have a lower income and less education. These levels of disengagement should ring alarm bells for anyone who cares about democracy.

The focus of the principles outlined, emphasizes the need to have a more equitable, accessible democracy, that improves the citizen's experience and enables greater participation. These aspects have been fundamental to the work of the UK Democracy Fund and the organisations and research we have supported, and we think it's critical that greater institutional processes are reformed to better reflect these needs.

The principles also acknowledge the need to put the citizens' experience at the heart of the reforms, enable participation to be simple, and integrated, to better fit the lives of those we want to ensure are included in our democracy. Since 2019 our coalition of committed funders have backed over 25 projects, with over £1.25 million funding, to explore ways to better encourage under registered citizens to participate in elections. The learning indicates that we are simply not doing enough to enable participation and inclusion in simple ways.

For many people, especially those who do not come from families or communities or demographic groups that regularly vote, the first step to voting is having someone invite you or ask you to vote. Low levels of voting amongst some demographic groups may be explained by how well political parties' and statutory bodies' campaigns reach those who feel furthest from politics. Civil society organisations have lots of experience of reaching these communities. For example, the Fund supported the Bangladeshi Women's Association Wales[1] during the 2021 local elections. Training

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[1] See https://bwaw.org.uk/ for more details. Accessed 28th December 2022

was provided to a group of volunteers to reach into their communities to ask people to register to vote, including being part of community events and festivals and enabling communications in culturally cognisant ways. This helped an estimated 1500 people participate in local elections across Wales who would not otherwise have done so.

A paper commissioned by the UK Democracy Fund from Professor Maria Sobolewska and Dr Andrew Barclay, on the democratic participation of ethnic minority and immigrant voters in the UK[2], highlighted that one of the main predictors of voting is having been asked to do so. The research found evidence that ethnic minority people and immigrants are less likely to be asked to vote by mainstream actors such as political parties. Research supported by the UK Democracy Fund to the introduction of Votes at 16 in Wales[3] found many young people who wanted to be educated on political positions and standpoints to give them confidence to vote. Researchers found that several participants had internalised the expectation that they were deficient citizens who are not yet capable of making an informed and efficacious vote choice. Other focus group participants expressed concern over the perceived legitimacy of young people as voters.

In 2019, the Runnymede Trust[4] surveyed Electoral Registration Officers (EROs) to understand what they were doing to improve Black, minority ethnic, and Commonwealth electoral registration and turnout. There was a wide variation in methods and activities, with many EROs doing very little to register these groups. Language barriers and limited translated material prevented EROs and outreach officers from communicating effective messages about eligibility to vote during the annual canvass. EROs also showed limited knowledge of community institutions for outreach (compared to familiarity with local charities supporting disabled voters, for instance). Connecting EROs to organisations with expertise in engaging with Black and minority ethnic communities could be significant in addressing this problem, although we know that EROs have faced significant resource challenges in recent years. However, again this shows the need for the principles outlined to operate in practice.

It is therefore critical that we do more to make democracy more inclusive and focused on the needs and experiences of under registered and lower propensity voters.

Obviously as with any principles, making them operational, rather than just aspirational will be critical to their success, and the wider consultation highlights a number of ways to immediately ensure these principles are lived.

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[2] Sobolewska and Barclay (2021), The Democratic Participation of Ethnic Minority and Immigrant Voters in the UK, November 2021 https://www.jrrt.org.uk/wp-content/uploads/2021/11/The_Democratic_Participation_of_Ethnic_Minority_and_Immigrant_Voters_in_the_UK.pdf

[3] Huebner et all (2021), Making Votes-at-16 Work in Wales Lessons for the Future, https://www.ntu.ac.uk/__data/assets/pdf_file/0039/1559829/Huebner-et-al_2021_Making-Votes-at-16-work-in-Wales.pdf

[4] For more information see https://www.runnymedetrust.org/

**3. What impacts, if any, do you think the proposed introduction of an all-Wales database of electoral registration data would have on the electoral process (such as registration and electoral services)?**

*Please consider the potentially positive and negative impacts and provide evidence to support your response, where available. Please comment on each characteristic individually.*

Data plays an increasingly influential role in shaping the world we live in, the choices we make and the quality of goods and services we access. Data is transforming the relationship that individuals have with institutions, customers with companies, and voters with government. The data revolution may very well prove to be a turning point, perhaps even as great as the first and second industrial revolutions.

However, the UK's electoral machinery was established in Victorian times, and large parts of the data architecture in the electoral world remains Victorian. This has a wide range of consequences, which force us to operate our democracy in the dark. For example, the UK is only able to estimate the completeness of the electoral register from studies carried out by the Electoral Commission to understand the number of duplicates and errors on the electoral register, and therefore it is very challenging to identify eligible missing voters and encourage them to register to vote[5].

The UK Democracy Fund has been supporting projects and research to better understand 'what works' in improving the participation of people who are least likely to be registered or vote in UK elections. However, the absence of a comprehensive electoral database, means that it is almost impossible to establish the effects of experimentation and grow the most effective approaches. Whilst we have a desire to support an evidence centre to be established in this field to help the UK be smarter and more effective in its approaches, the basic data foundations are not in place.

Many of the grantees supported by the UK Democracy Fund have had to develop complicated proxies or workarounds to understand whether their work is effective in targeting under registered populations, supporting them to register and to vote in elections. This is often an enormous burden for small civil society campaigners, and also means that as a field we are not getting the learning to help better understand how to use resources to effectively support a more inclusive and fair democracy.

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[5] 2019 report: Accuracy and completeness of the 2018 electoral registers in Great Britain
https://www.electoralcommission.org.uk/major-study-electoral-registers-great-britain-shows-changes-are-needed-help-millions-people-ensure

Even where the UK Democracy Fund have worked with leading academics such as Peter Johns at Kings College London[6] and Dr Florian Foos at LSE[7] to run a series of randomised control trials to understand the effects of specific interventions on voter participation, it has proven very challenging to access the data required, even with a data agreement in place with the Electoral Commission. This shows the fundamental flaws in the data system, and the possibilities of being able to systematically understand how to improve voter registration and participation in the UK. In this case the most effective way to access data and run effective experiments was where an individual local authority level partnership could be established. However, this type of arrangement has proven challenging to establish for both civil society campaigners and academics that the Fund has supported, and heavily restricts the ability of us to understand digital interventions such as social media advertising which by its very nature tends to spill outside of neatly defined geographies.

To investigate this further and understand the reforms needed, in 2021 the UK Democracy Fund commissioned academics Toby James and Paul Bernal from the University of East Anglia. They have carried out a wide-ranging study examining international best practice, a thorough literature review, an audit of local authority websites, a survey with EROs and an examination of current data[8].

The study finds that the UK government, devolved administrations and much of local government have made commitments to better use data to improve public services, yet have not seized the opportunity to explore how electoral data can be used to improve many parts of the electoral process and strengthen our democracy. Addressing the gaps and developing a data infrastructure fit for the 21st century has huge practical and social value and are vital to address the serious problems with participation at UK elections.

The study finds considerable problems with the current elections data infrastructure and approach:
- There are considerable data blackholes – electoral data which is unavailable, but which it would be in the public interest to have collected and published. For example, there are no localised estimates of the accuracy and completeness of the electoral register. Citizens are not informed of the names of officials responsible for running elections and there is no data on complaints made. There are a number of areas that severely limit transparency. Data on key demographics, black and minority ethnic groups for example, is particularly poor.
- Data is often collated in unworkable formats. For example, candidates' information is not published in a format that is helpful to journalists or useful to inform citizens. Marked

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[6] See https://www.kcl.ac.uk/people/peter-john, accessed 28th December 2022
[7] See https://www.lse.ac.uk/government/people/academic-staff/florian-foos, accessed 28th December 2022
[8] See https://www.jrrt.org.uk/wp-content/uploads/2023/01/Electoral-Data-Democratic-Deficit-Report-FINAL.pdf

registers are stored in mostly hard copy format, which restricts usability severely limiting the ability to develop interventions to improve voter registration and turnout, and for researchers to understand what works.

- There is considerable inequality in who has access to data. The larger political parties and those with sufficient resources have the ability to compile much of this data. Civil society groups seeking to promote non-partisan political engagement have no effective tools to measure the success of their activities. Overall, this means that too little is done to address inequalities in participation in elections.
- There are monitoring gaps in how key electoral data is used, including individual level data on whether people have voted at an election and their history of voting at previous elections. This is often being used without citizens' knowledge of who and for what purpose the data is being accessed.
- There is untapped data potential where electoral data could be used to support citizens to be better informed, for electoral institutions to be much more transparent and for a wide range of actors (including regulators, media, and civil society) to leverage data to promote participation in elections.
- The system has been partially propped up by civil society groups who have developed important tools such as polling station search tools and candidate data, but which lack the security of funding. These tasks should be the responsibility of statutory public electoral organisations.

To address these challenges, the study makes a number of recommendations. A core recommendation is an increased role for the Electoral Commission to act as central repository of registration data and that a single UK wide electoral register should be established and made available to those using it on the basis of public interest only. It was also foreseen that there would be a need for registers to be available for Wales, Scotland and Northern Ireland, as well as potentially on a regional and sub- regional basis too.

These recommendations seek to balance the needs of public interest and being able to have a complete view of registration to support greater equity and inclusion or participation, whilst ensuring that personal data is treated with the care and attention needed. It is also important to consider and balance the risk of compiled data being used for nefarious or inappropriate reasons. The report therefore particularly examines the risks posed by having a complete data set from an individual basis - examining privacy issues, and from more national bases with concerns for security and electoral interference for example.

Currently this compiled data (the full register) is already held by a number of actors including political parties, credit reference agencies and commercial organisations who have sufficient resources to spend pulling this data into one place. Whilst the data can be requested on a local authority by local authority basis, very few compile this data. Whilst all this data is currently sent

to the Electoral Commission, the mixed formats of the data means this is currently not in usable, accessible and sharable formats.

The report therefore makes recommendations to balance the risks and the public interest in having a data architecture and system that supports a 21st century democracy that is fit for purpose.  This includes the need to view the open electoral register, that a single UK wide electoral register be established, but made available to those using it on the basis of public interest only, and that recipients of the electoral register should be required to sign a statement of how they intend to use it.  It would obviously be wise to develop a monitoring approach to review the success in establishing this database, and regularly review of potential risks and benefits.

### 7. From your perspective, should the franchise reflect the changes in the status of EU citizens now the UK has left the EU?

The franchise in the UK has become increasingly complex, with residency-based voting rights in Scotland and Wales, and changes in the franchise for EU citizens brought in under the Elections Act 2022.   The UK Democracy Fund has funded a variety of organisations including POMOC and the3million who are working to help EU citizens to participate in UK democracy.  This work is complex and extremely challenging, particularly because of the confusion regarding the franchise and the misunderstanding of EU migrants around their voter eligibility.  As part of their work the3million have carried out an analysis of the participation gap of EU citizens and the patterns[9]. This research highlights that a key barrier to participation, and the most prominent one identified by the3million's consultation on EU citizens' political rights, is the limited or inaccessible information on EU citizens' democratic rights. It is critical that all people understand their democratic rights in the UK.

Available data points consistently to the existence of large gaps in electoral registration for minorities and immigrants, but these differ by origin. EU migrants appear to be the least registered, with Barclay and Sobelwska's analysis suggesting that approximately 39% are not registered[10] (although this area requires further research and analysis, in light of new census data. We also know that it is challenging to get a full national picture because of the lack of a national database, issues with duplication as outlined elsewhere).  For many EU immigrants a crucial obstacle seems to be the 'myth of return'[11], which leads to the poor take-up of British citizenship, thus limiting these immigrants' eligibility to vote and preventing a sense of involvement in British politics and state. Analysis from the Migration Observatory at Oxford University suggests this has

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[9] Gergs and Bulat (2020) Mind the gap An analysis of EU citizens' political participation and representation in the UK https://the3million.org.uk/sites/default/files/files/Ming%20the%20gap.pdf
[10] Barclay and Sobolewska (2021) The Democratic Participation of Ethnic Minority and Immigrant Voters in the UK https://www.jrrt.org.uk/wp-content/uploads/2021/11/The_Democratic_Participation_of_Ethnic_Minority_and_Immigrant_Voters_in_the_UK.pdf
[11] Ryan (2015) Another year and another year: Polish migrants in London extending the stay over time Social Policy Research Centre.

continued for EU migrants post Brexit referendum[12]. Acquiring citizenship is difficult and expensive, compounding the problem. The relative difficulty of registering to vote in the UK is particularly important for immigrants, especially EU citizens, many of whom come from countries with automatic voter registration. Automatic Voter registration therefore seems to be a key change that could better support EU migrant participation.

The UK Democracy Fund commissioned Barclay and Sobolewska to carry out a comprehensive analysis of literature on the democratic participation and immigrant voters published in 2021. This highlights the lack of data around EU migrant participation, but also examines the consequences. The report examines the research highlighting that although the rates of naturalisation have gone up for EU citizens following the 2016 Brexit referendum, as a result of the referendum outcome undermining the legal entitlements of EU migrants in the UK, they still lag behind those of Commonwealth arrivals, at 16 per cent in 2019.[13] This is partly to do with the length of time migrants from these different regions have been in the UK - commonwealth migrants generally having a longer history. This is also partly to do with the sense of status security that being an EU citizen used to bring but is seen to persist for more developed and richer countries of the EU.

Most will agree that a participation gap is harmful to those groups which are excluded from electoral politics and that to address this problem we must correctly identify the reasons for its existence, as well as effective remedies. The summary research developed by Barclay and Sobolewska outlines what is understood to be the main reasons. The retention of residency-based voting rights, alongside programmes and campaigns that actively engage under registered and low propensity voters is key to a more inclusive and fair democracy in Wales, and the integration and belonging of immigrants who make their home in Wales.

**8. How can we best help people understand they have been automatically registered and feel confident that their data is protected, especially for people who may be vulnerable or wish to register anonymously?**

The research conducted by Toby James and Paul Bernal commissioned by the UK Democracy Fund, examining the case for automatic voter registration, outlined a number of accompanying reforms to overcome issues with privacy and data security[14]. Recommendations included that new direct enrolments should not be added to the open/edited electoral register and that the open register should be abolished. Anonymous registration, to protect those who are vulnerable, should be extended to at least five years and the procedures to register anonymously should be relaxed

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[12] Vargas-Silva and Rienzo (2022) Briefing Migrants in the UK: An Overview, The Migration Observatory Oxford University, https://migrationobservatory.ox.ac.uk/resources/briefings/migrants-in-the-uk-an-overview/
[13] Fernandez-Reina and Sumption (2020) Citizenship and naturalisation for migrants in the UK Briefing 6th Revision. Oxford: The Migration Observatory, University of Oxford.
[14] James and Bernal (2020) Is it time for AVR in the UK?, https://www.jrrt.org.uk/wp-content/uploads/2020/04/Is_it_time_for_AVR_in_the_UK.pdf

to prevent vulnerable adults being at risk of harm. It also recommended tightened restrictions on the use of the electoral register for non-electoral purposes.

It is unlikely that eligible voters currently provide informed consent for the use of their data, and its inclusion on the open register. Government bodies are tasked with the challenge of striking an appropriate balance between the usefulness of automatic voter registration and the privacy of the data subjects. This balance is especially important due to the larger implications it poses to citizen trust and confidence in government. If citizens feel that their privacy has been breached, they may feel betrayed or lose trust in their government.  It will be important to build public awareness of the potential impact and use participatory processes to consider what safeguards on data handling, security and privacy need to be put into place, including ability to opt out of data being available to third parties on the register.

### 9. To what extent do you agree with the removal of the open register in relation to devolved elections?
**Strongly Agree**

Please explain your answer

A whole range of actors have increasingly called for the removal of the open register including AEA[15] and the House of Lords[16] As part of the research by Toby James and Paul Bernal commissioned by the UK Democracy Fund to examine the UK's Electoral Data deficit[17] the team examined the role of the open register.  They found that the range of actors who use the open register is ultimately unknown.  The universal availability of the edited/open register to anyone has privacy implications. People may not be fully aware of the implications of their choice not to be removed from the edited register, so their choice not to opt out is unlikely to be a genuinely *informed* choice.

Toby James and Paul Bernal also found that it seems that making individual level electoral registration data freely available without any safeguards is a policy out of line with the likely threats to democracy and elections and provides no obvious benefits for the electoral process itself.  They cited particular risk to micro targeting of misinformation to individual voters for example as a possible consequence of the risks.   They suggest that there should be careful monitoring, at the very least, of who is purchasing this information and for what purposes.  But on balance, they have recommended that it would be safer to cease to publish the electoral register in an open format. Instead, they propose providing access to the register based on a public interest test, and

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[15] AEA, Policy Position Paper – Sale of the Register of Electors, 2019 https://www.aea-elections.co.uk/wp-content/uploads/2019/10/sale-of-register-fees-aea-policy.pdf
[16] House of Lords Select Committee on the Electoral Registration and Administration Act 2013: An electoral system fit for today? More to be done, July 2020, https://committees.parliament.uk/publications/1792/documents/18271/default/
[17] See https://www.jrrt.org.uk/wp-content/uploads/2023/01/Electoral-Data-Democratic-Deficit-Report-FINAL.pdf

that individuals and organisations accessing the data sign a voluntary declaration regarding its use. They propose the reasons for accessing the data would be monitored by a body such as the Electoral Commission.

**10. Should the Welsh Government place a duty on local authorities to have data sharing agreements within the authority itself, and where applicable, with other authorities or organisations?**

**Yes**

Please explain your answer:

EROs already undertake data-mining activities to improve the quality of the electoral register. Electoral Commission guidance states that EROs can demand access to locally held information by local authorities to improve the electoral register and that such request cannot be declined: 'Paragraph 1(5) of Schedule 2 to the Representation of the People Act 1983 provides that where the ERO requests to inspect and/or take copies of the records specified in paragraph 2.42, a statutory or other restriction, including the GDPR, cannot be used to refuse disclosure of those records.'[18] However, anecdotally we understand that EROs can experience challenges with accessing this data, and there can be concerns about targeting underrepresented groups and its effects on electoral outcomes. We have also been informed anecdotally, that due to the resource pressure many electoral teams face, that many EROs do not have the time or capacity to do this, and that some EROs have found this is not necessarily cost effective. This means these activities are unevenly implemented in local authorities, and more could be done to develop and share learning and effective practice in this area.

Whilst we would encourage better access and use of data to improve the accuracy and completeness of the register, and the experience of eligible voters, we should not underestimate the resource constraints currently faced by EROs. Whilst we know there has been greater investment in Wales, and efforts made to bolster the electoral teams in Wales, more could be done to learn from leading data practice including experimentation with actors such as Office for Data analytics which are being used to support local government data practice[19]. Therefore, any data sharing agreements are unlikely to be a silver bullet, and need to be supported by other means, including the development of the capabilities and capacities in Electoral Registration teams to use this data effectively.

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[18] Electoral Commission, Guidance for Electoral Registration Officers Part 4 – Maintaining the register throughout the year, 2019 https://www.electoralcommission.org.uk/sites/default/files/2019-08/Part%204%20Maintaining%20the%20register%20throughout%20the%20year.pdf
[19] Examples of work on Office for Data Analytics can be found at https://www.nesta.org.uk/project/offices-of-data-analytics/, although there are examples in local authorities in various parts of the country.

A key development in Wales would be to have a common data standard, and a shared approach to the use of electoral management software. The Open Election Data principles[20], developed by the Open Election Data Initiative outlines key principles which should be considered, but should also be underpinned by a detailed data standard to support future interoperability, accuracy and usability.

In the absence of national voter register, there is also a need for a clearer process and approach for data sharing agreements with civil society campaigners, academics and education institutions such as Universities, where there is a clear public interest case. For example in Wales it could be possible to work with EROs to create a electoral data test bed area or areas, and for a number of organisations to work to experiment to understand the effects of voter registration and get out the vote efforts. This could be a huge source or learning, and better support the field to understand what works. It would be particularly significant where Electoral Registration teams identified under registered populations and worked with academics or civil society campaigners to do targeted outreach and experimentation.

As we outline below, having data sharing agreements in places with Universities, Higher Education institutions and alternative providers, should be considered a resource priority in order to ensure a large number of young people are registered.

**11. Are there any specific aspects of automatic registration that should be piloted before we move to an all Wales roll out?**

**Yes**
No
Don't know

Please explain your answer:

The UK Democracy Fund, broadly and warmly welcomes the interest in Automatic Voter Registration, and our evidence and experience indicates that this is a critical reform to address the systemic roots of the issues of under registration and participation of key demographics. Modernising and simplifying the voting system, for example by introducing automatic voter registration, is vital to achieving a long-term sustained uplift in voter participation. Some form of direct enrolment is the norm in democracies around the world, because many countries are able to use population registers to directly enroll citizens. The UK does not have this. However, even countries such as Australia, Canada and the USA who have historically not enrolled citizens, have recently implemented it for specific under-registered groups such as young people or when accessing specific government services such as driver license agencies. So, in many ways the UK is becoming increasingly out of step with global learning on this front.

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[20] https://openelectiondata.net/en/guide/principles/ accessed on the 29th December 2022

The adoption of Automatic Voter Registration can take many forms. In April 2020 the UK Democracy Fund published a comprehensive research report examining Automatic Voter registration, commissioned from Toby James and Paul Bernal[21]. The research examines the most effective and cost-effective approaches to adopting Automatic Voter Registration in the UK.

The research report provides data on the current frequency of citizens' transactions with some key government services. It suggests that direct enrolment for specific groups, particularly young people and assisted voter registration could be the most cost-effective methods that would lead to considerable improvements in the completeness and accuracy of the register.

It estimates that directly registering citizens shortly before their 16th birthday when they are issued their National Insurance Number would add 700,000 citizens to the roll each year with minimal administrative effort. These citizens could then be provided accompanying civic education lessons while in school.  In the Welsh context, it would therefore be worth experimenting with joint working with DWP to understand the effectiveness of this way to carry out Automatic voter registration.  It would also be important to consider the effects of comprehensive education and the voter pathway for young people, as has been highlighted in research on Making Votes-at-16 Work in Wales Lessons for the Future.[22]  However, given the franchise starting at 16 for local and Senedd elections, this touchpoint will not be early enough to help Welsh government capture attainers.  It would therefore be worth considering education data as a source, and whether this is a more effective touchpoint in the Welsh context, or whether National Insurance issue would still be a critical point.

Providing citizens with an option to register to vote/update their registration details when accessing other government services would enable millions of citizens to register more easily. For example the 2020 research estimated that across the UK  6.5 million per year could register when applying for a passport, 4 million people could register when they update their driving license address with the DVLA, 2 million a year could register when applying for Universal Credit,  2.5 million students could be registered through annual student enrolment, 800,000 could register when they apply for child benefit for the first time, 500,000 could register when they provide the Student Loans Company with a new address,  450,000 could register when they apply for disability benefits.  It will therefore be critical to experiment with key public service interactions and learn what will be most effective in reaching key demographics.   This learning will be critical and allow processes to be developed to be most effective.

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[21] James and Bernal (2020), Is it Time for AVR in the UK https://www.jrrt.org.uk/wp-content/uploads/2020/04/Is_it_time_for_AVR_in_the_UK.pdf

[22] Huebner et al. (2021) Making Votes-at-16 Work in Wales Lessons for the Future https://www.ntu.ac.uk/__data/assets/pdf_file/0039/1559829/Huebner-et-al_2021_Making-Votes-at-16-work-in-Wales.pdf

Finally, it would be useful to experiment and learn more about education and communications approaches that effectively support people to understand automatic voter registration and what it means for them. There are a range of ways in which the perceptions and concerns of citizens across Wales can be better understood and citizen participation in shaping the approach is likely to lead to more successful implementation.

**12. To what extent do you agree or disagree that students should have the option to register to vote whilst enrolling at university?**

**Strongly Agree**

Please explain your answer:

People aged 18-34 have the lowest registration and turnout rates of all ages in UK elections[23]. It is critical that we make efforts to be more inclusive in our processes.

The automatic enrollment of students during their university registration process, has long been highlighted as a key area of reform. For example the now disbanded All Party Parliamentary Group on Democratic Participation previously recommended that university, further education and higher education students are prompted to register to vote when they annually enroll on their course[24].

Over the last few years, the UK Democracy Fund has supported efforts to better enable students to register and participate in UK elections. In 2019, the UK Democracy Fund backed Vote for Your Future[25], an organisation aiming to support many more young people to participate in the 2019 elections. As part of their work, they partnered with the Times Higher Education Supplement to carry out rapid research to benchmark the practice of all universities to support student voter registration and participation. Over 60 Universities responded, sharing a wide range of experiences and practices. Overall, the research found that the most effective and efficient approach to supporting student voter registration was automatic registration alongside enrollment. Whilst there were lots of other tactics undertaken by universities, no others had such an impact as the 'Sheffield model'[26]. The Sheffield model has been widely flagged as best practice because an estimated 75 per cent and 76 per cent of students were enrolled in the first and second year

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[23] Chrisp and Pearce (2021), The Age divide in UK Politics: a working paper for JRRT
https://purehost.bath.ac.uk/ws/portalfiles/portal/227573976/the_age_divide_in_uk_politics.pdf
[24] Bite the ballot, Clearview and James (2016) Getting the missing millions back on the electoral register A vision of voter registration reform in the United Kingdom, https://tobysjamesdotcom.files.wordpress.com/2013/11/draft-missing-millions-report-dr-toby-james-bite-the-ballot-2016.pdf
[25] Vote for your Future closed in 2021, but we have the resources from this work and would be happy to share this information if useful.
[26] Facilitating Electoral Registration Secretary of State for Education Guidance to the Office for Students (OfS) 2018 - Case study 3 https://www.officeforstudents.org.uk/media/b00308ae-936b-4187-9c8c-0bcd3d286159/facilitating-electoral-registration-guidance.pdf

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of the scheme being implemented[27] this compares to rates as low as 13 per cent for other universities.

This has been subsequently echoed by a more recent study conducted by IFF on behalf of the Cabinet Office examining the condition and student voter registration in England[28]. This study also found that in England, whilst a variety of efforts were being undertaken by universities to support voter registration, little was being done to monitor the effectiveness of the efforts. This means that efforts could be wasted on things that have little to no effect. We would therefore encourage the Welsh Government to concentrate on the high impact effects of registration alongside enrollment.

The UK Democracy Fund has recently commissioned further research into the role of universities in supporting the electoral registration of students, with a particular aim to establish what it would take to scale up the good practice of auto registration alongside enrollment. The approach includes qualitative interviews examining the technical steps required to implement this, and the barriers that are preventing Universities from implementing it. The UK Democracy Fund would be happy to work alongside the Welsh Government to share insights and learning as this work develops.

In the context of Wales, given votes at 16, we would also advocate for an extension of this to FE and HE institutions, as well as Alternative Providers across Wales.

**12a. Should any data that is provided be subsequently shared, via a data sharing agreement, with the relevant Local Authority's Electoral Services Team?**

**Yes**

Please explain your answer: Please see previous answer in question 12 and the good practice standards from Sheffield. It is essential that the core data sharing process, which is at the heart of this process, is established and used to assess the effectiveness of the intervention. The data sharing agreement should be put in place between the university and the ERO/ Local Authority.

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[27] Minister praises University's successful voter registration scheme, 2016
https://www.sheffield.ac.uk/news/nr/voter-registration-chris-skidmore-1.665948 Article accessed on the 2nd January 2023
[28] Skone James, Castell, White (2021), Student Electoral Registration Condition Evaluation
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004903/SERC-Evaluation-Report.pdf

**Question 39 What types of innovation in electoral administration would you like to see piloted in the future?**

The UK Democracy Fund has been greatly encouraged by the experimentation and pioneering efforts in Wales already undertaken to improve fairness and inclusion in democracy. The 2021 Pilots were a great example of experimentation and learning that we think is essential to developing a democracy that is fit for the 21st Century.

The implementation and experimentation with electronic poll books, is an element that we think could benefit from further development. The role of electronic poll books is one of the key propositions outlined in the UK Democracy Fund commissioned research from Toby James and Paul Bernal on The UK's Electoral Data Democratic Deficit.[29] There is a great opportunity for further experimentation to understand how these could work, and where for example notifications could be used to encourage voter participation on election day to increase turnout. We would welcome seeing further experimentation in Wales building on the work you have started.

Two further areas appear to be critical but not covered in the work outlined. Firstly the trialing of same day registration, so that people not registered could sign up on election day. Previous surveys of poll workers at electoral contests in 2015, 2018 and 2019 repeatedly found that the most common problem was citizens asking to vote who were missing from the electoral register. Roughly two thirds of polling stations are thought to turn away at least one voter at general elections[30], and half at local elections in England.[31] It is critical that we learn to capture people's interest when people are most interested, and there is a need to learn more about the potential risks and opportunities this approach poses. Whilst, this is obviously not without risks, but we will only see if this helps better support greater levels of registration and participation through experimentation. Obviously, the introduction of Voter ID requirements by the Elections Act 2022 adds further complications to this but this should still be considered.

The second area of innovation and experimentation required is an online service for citizens to be able to check if, and where they are registered. This has long been discussed with a whole range of campaigners and bodies, as outlined in a recent House of Lords recommendation[32]. The consultation has already highlighted the potential need for a centralised database. This would be a key step, in building the infrastructure to enable citizens to understand if they are already registered. Where this was created, trialing a service where you could quickly and easily check registration could offer huge benefits. This would also enable campaigners, and local authority

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[29] See https://www.jrrt.org.uk/wp-content/uploads/2023/01/Electoral-Data-Democratic-Deficit-Report-FINAL.pdf
[30] Clark and James (2017). "Poll Workers." In Election Watchdogs, edited by Pippa Norris and Alessandro Nai. New York: Oxford University Press.
[31] James and Clark, (2019), "Electoral integrity, voter fraud and voter ID in polling stations: lessons from English local elections." Policy Studies, p. 1-20.
[32] See evidence outline on the Online checking Tool in House of Lords Select Committee on the Electoral Registration and Administration Act 2013: An electoral system fit for today? More to be done, July 2020, https://committees.parliament.uk/publications/1792/documents/18271/default/

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staff to better concentrate outreach efforts to better support those who are under - registered. This is also seen as a key way to reduce the administration burden of duplicate records for elections administration staff. Ultimately, it is important that this could operate online, alongside the voter registration website, but initial experimentation in this area would be very welcome.

**45. Should the Welsh Government consider making provision for an online voter information platform? What information should be provided on the platform and who should host it?**

**Yes**

Please explain your answer:

Whilst the information provided by the Electoral Commission is really useful, as part of the work of the UK Democracy Fund to support 1 million more low propensity voters to be registered by the next general election, a clear need for a central hub of information both for voters and for campaigners has been demonstrated.

The Fund has backed a broad range of voter registration and get out the vote campaigns, and there is clearly a need for a core set of materials to support these campaigns including basic information on voter registration, eligibility, awareness materials and ways to communicate information about different types of elections. The learning from projects also demonstrates that is extremely helpful if these materials are culturally competent and can reach and communicate with audiences in meaningful ways that fit with people's lives.

Migrants Organise[33] had greatest success at registering people who had recently gained the entitlement to vote or had only just found out about their entitlement and used information on street stalls and social media posts. Citizens UK's Can I Vote? website[34] aimed to address this lack of knowledge and was used by a variety of projects as a key source of information. A number of projects also worked to create culturally competent materials and information, not only ensuring that information was available but that it was also designed for cultural identity and cultural context. Culturally competent approaches also recognise and design for plurality, and do not seek to create 'one size fits all' approaches based purely on nationality or cultural background. POMOC's Shevotes/ Ona Glosuje campaign[35] was designed by Polish women for Polish women. All information was designed to have cultural and contextual resonance, but also aimed to recognise the different interests, perspectives, and life experiences of Polish women.

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[33] https://www.migrantsorganise.org/ accessed 28th December 2022
[34] https://www.citizensuk.org/
[35] https://www.shevotes.org.uk/ Accessed 28th December 2022

These campaigns offer enormous learning and have developed great insights, but there is a danger of reinventing the wheel, with each new effort. Bite the Ballot acted as a central hub of resources for campaigners for a number of years but has since closed. There is obviously key learning from Bite the Ballot about what might and might not work for any online voter information website. Democracy Classroom[36], hosted by the Politics Project, and supported by the UK Democracy Fund, provides a repository of information not only for the schools and citizenship teachers, but the wider sector. There is an opportunity to expand this role.

There is also a clear opportunity to better provide information for voters and people interested in registration. In a digital age, people want clear and up to date information. Democracy Club have developed a number of services, compiling essential information on where to vote and who you can vote for[37]. These services have filled essential gaps in information for voters which should be provided by public services. Further gaps in key information could be filled through innovative work by organisations such as Democracy Club. But it is essential that this kind of information is not reliant on civil society organisation filling gaps and should be either sustainably funded or embedded into the provision of statutory services.

Whilst some Local Authority websites provide this information, research has found this is not consistent and information can be patchy[38]. Information that is clear, simple and trusted is key. It would also be useful if political campaign information was easily accessible to audiences. However, one central repository may not work well for different audiences, and more would need to be understood about how best to reach and communicate with low propensity voters and under registered audiences. An alternative would be to have materials that were shared across various platforms to better reach audiences where they are.

**52. In addition to provisions in the Curriculum for Wales, are there any other measures that the Welsh Government should put in place through the education system to ensure that learners in Wales can confidently take part in Welsh elections?**

To support the extension of the franchise in Wales in 2019, the UK Democracy Fund supported research into 'Making Votes-at-16 Work in Wales'[39], alongside supporting a portfolio of initiatives[40] to better enable young people's participation. This work was obviously hugely interrupted by COVID19 which changed the ability of many organisations to engage and work in planned ways.

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[36] https://www.democracyclassroom.com/ Accessed 29th December 2022

[37] https://democracyclub.org.uk/voters/ Accessed 29th December 2022

[38] See assessment of Local Authority websites outlined in The UK's Electoral Data Deficit: A vision for digital modernisation, James and Bernal, January 2023. https://www.jrrt.org.uk/wp-content/uploads/2023/01/Electoral-Data-Democratic-Deficit-Report-FINAL.pdf

[39] Huebner et al (2021) Making Votes at 16 Work in Wales, https://www.ntu.ac.uk/__data/assets/pdf_file/0039/1559829/Huebner-et-al_2021_Making-Votes-at-16-work-in-Wales.pdf

[40] Details of funded projects can be found at https://www.jrrt.org.uk/uk-df-franchise-in-wales/ accessed 2nd January 2023

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Initial findings from this research raise a number of questions as to how and in what ways young people can be supported in their journey to Democracy. As part of the research team's policy brief, 'The Welsh Way to "Votes-at-16″[41], the team highlights the importance of a synchronised policy approach whereby newly-enfranchised voters feel sufficiently politically socialised, engaged, and literate to vote for the first time. Young first-time voters in Wales in May 2021 frequently stated they were unclear about the role and function of Senedd or its impact on their lives and chose not to vote. This feedback highlights the provision of statutory and universal democratic education both in schools and colleges, and also through local community youth groups, as a vital component of successful inclusion of young people in democracy and as part of their journey to democracy.

The research team also found that the lack of comprehensive democratic education also impacts on the ability of young people to understand the 'voter journey' to the ballot box, with many having little understanding of how to get on the electoral register or how to vote. This lack of awareness is a barrier to younger voters, who often disengage due to anxieties about the process of voting. To support a more comprehensive and structured journey for young people towards democracy, inclusion in the curriculum is a great start. However, evidence would suggest this will be insufficient alone. Research from Dr James Weinberg providing a comprehensive evaluation of the provision of democratic education in English secondary schools,[42] highlighted the need for strategic investment in teacher training and continued professional development. Whilst there has been investment in the Welsh curriculum, the support and development of staff to be able to work on this will no doubt remain an issue in Wales.

We know that democratic education in schools can improve attitudes and intention to vote and reduce political inequality. The UK Democracy Fund has backed a number of initiatives that work with schools to support young people's education and exposure. The EducateGE Programme, a collaboration between The Politics Project, the Association for Citizenship Teaching and Dr. James Weinberg, sought to bring together a wealth of information for teachers in the run-up to the snap 2019 general election, with a further 20+ partner organisations pooling information. This has now evolved into the Democracy Classroom[43]. To improve the evidence in this area, the programme included research into the impact of democratic education[44]. The findings, based on surveys with 168 teachers and 403 students, demonstrate that democratic education in schools can not only positively impact on students' expression of voting intent and attitudes, but can 'close

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[41] Huebner et al (2021), The Welsh Way to Votes at 16 https://www.ukvotingage.co.uk/policy-report-the-welsh-way-to-votes-at-16/
[42] Weinberg (2021), The Missing Link: An updated Evaluation of the Provision, practice and Politics of Democratic Education in English Secondary Schools, https://drive.google.com/file/d/121L4ut1aywmZpd2hbAzVRI6xlTQxdCgB/view
[43] https://www.democracyclassroom.com/ Accessed on the 2nd January 2022
[44] Weinberg (2021), Politics in schools 'What exists' and 'what works'? https://www.psa.ac.uk/sites/default/files/PoliticsinSchools-RESEARCHREPORT_17_11_20-min%20%281%29_compressed_compressed%20%281%29.pdf

the gap' between White and Black and minority ethnic students, and between those who regularly discuss politics at home and those who never do.

The study also found that:
- Students aged 17 to 18 years were 39% more likely to say they intended to vote if they had received one lesson dedicated to political education a week compared to those who had never received such classes.
- Mock elections increased students' expressed intention to vote by 25%.
- How students are taught matters most: participatory pedagogy was most strongly associated with increases in positive attitudes towards voting. Exposure to participatory teaching methods meant that students were 40% more likely to say that they intended to vote.
- In terms of likelihood of participating in other political acts (such as joining a campaign or contacting a politician), regular exposure to participatory teaching methods was able to overturn the participation gap between young White British men and Black and minority ethnic men and reduce the gap with Black and minority ethnic women.
- There was a correlation between the number of years that students had received democratic education and the oldest students' knowledge about and expressed interest in participating in democratic institutions. This suggests that interventions are needed across the school career, not just when young people are about to be given the right to vote.

While it is not possible to evidence direct impact through numbers who registered or turned out to vote as a result of schools-based interventions, there is a strong correlation between changes in attitudes towards voting and impact on voter registration and turnout rates.  These findings suggest that democratic education and schools-based interventions should be looked at as ways to both increase voter participation and reduce political inequality. However, this cannot be left to chance – we know schools and teachers face a huge amount of pressure, and it can be difficult to incorporate this work.  In spite of the statutory requirements around citizenship education, it is often a peripheral subject and there is a need to support teachers and schools with a minimum education offer for all young people.

 *"We get sex education in school but not political education… So where else are we going to find out about politics?" National Youth Theatre Wales Project Participant.*

There are a number of civil society-led programmes seeking to support citizenship education including the Politics Project, My Life My Say, Shout Out UK, I have a voice, Citizens UK and many more. But it will need a concerted collaboration across schools, civil society organisations and policymakers to drive forward this agenda at the scale required. There are huge demands on teachers, and more needs to be done to connect schools, resources and projects systematically. We are encouraged by the appetite for a more coordinated, nation-wide approach to include

political education across Wales, and there is much to learn about what will best support young people. The APPG on Political Literacy is working on this agenda and aims to explore and discuss a wide range of strategic measures, ideas and interventions to strengthen provision for and teaching of political literacy in schools. Alongside schools-based provision, more evidence is required to understand the effect of non-school provision in youth clubs or arts engagement for example. More work also needs to understand how to support the education of people no longer in school or higher education, and how to create effective pathways and support for people across the course of their lives.

Lastly the work of the team of researchers on Making Votes at 16 work in Wales also found that there is a need for an increased role for political parties[45].  Their research found that there was insufficient outreach and communications from political parties directly addressed at young people.

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Responses to consultations may be made public. To keep your response
anonymous (including email addresses) tick the box.

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[45] Huebner et al (2021) Making Votes at 16 Work in Wales, https://www.ntu.ac.uk/__data/assets/pdf_file/0039/1559829/Huebner-et-al_2021_Making-Votes-at-16-work-in-Wales.pdf