Title: The Representation of the People (Postal and Proxy Voting etc) (Amendment) Regulations 2023 **IA No:** Department for Levelling Up, Housing and Communities - Elections 02 (2023) **RPC Reference No:** N/A **Lead department or agency:** DLUHC **Other departments or agencies:** N/A	**Impact Assessment (IA)**
	Date: 25/06/2023
	Stage: Secondary
	Source of intervention: Domestic
	Type of measure: Secondary legislation
	Contact for enquiries: electionsresearchanalysismailbox@levellingup.gov.uk

Summary: Intervention and Options	**RPC Opinion: Not Applicable**

Cost of Preferred (or more likely) Option (in 2023prices)			
Total Net Present Social Value	**Business Net Present Value**	**Net cost to business per year**	**Business Impact Target Status** Not a regulatory provision
-£75.9m	£-	£-	-

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

The 2016 Lord Pickles report, 'Securing the Ballot: review into electoral fraud', identified a range of potential vulnerabilities in the absent voting system. In response, the Government is introducing a suite of measures which seek to strengthen the integrity of our electoral system and ensure that our elections remain secure, fair, modern and transparent. These measures include: an identity checking process for absent vote applications, setting a maximum length of 3 years for postal vote arrangements, and limiting the number of electors for whom someone can be appointed to act for as a proxy. Additionally, Government plans to use technology to increase the accessibility and efficiency of absent voting applications by allowing electors to apply online.

What are the policy objectives of the action or intervention and the intended effects?

The Government is delivering its Electoral Integrity Programme and in doing so is fulfilling its commitment to protect our democracy and ensure that it remains secure and fit for the modern age. The effect of the measures contained in this statutory instrument is that, for reserved polls in England, Scotland and Wales, electors will: be able to apply for certain types of absent vote arrangement online, be subject to an identity check as part of their absent vote application, be able to hold a postal voting arrangement for a maximum of 3 years; and at reserved polls in England, Scotland, Wales and Northern Ireland, be able to be appointed to act as a proxy for up to 4 electors (no more than 2 of which may be domestic electors).

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

Option 0: Do Nothing: The current system of absent voting would remain in place if no policy changes were made. This option does not provide for applications to be made online, for applications to be subject to additional identity checks (beyond existing checks on signature and date of birth), or for changes to postal and proxy rules.

Option 1 (Preferred option): Postal and Proxy Voter Revisions and Online Absent Vote Applications (inc. ID Checks for applications). This option contains the changes resulting from the Elections Act 2022 provisions, which include an identity checking process for absent vote applications, setting a maximum length of 3 years for postal vote arrangements and limiting the number of electors for whom someone can be appointed to act for as a proxy as well as the introduction of an online system for certain types of absent vote application. Further information on where the measures specifically apply can be found in Table 2.

Will the policy be reviewed? It will not be reviewed. If applicable, set review date: N/A				
Is this measure likely to impact on international trade and investment?	No			
Are any of these organisations in scope?	**Micro**: No	**Small**: No	**Medium**: No	**Large**: No
What is the CO₂ equivalent change in greenhouse gas emissions? (Million tonnes CO₂ 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 Minister: SCOTT OF BYBROOK Date: 17/07/2023

Summary: Analysis & Evidence

Policy Option 1

Description:

FULL ECONOMIC ASSESSMENT

Price Base Year 2023	PV Base Year 2023	Time Period Years	Net Benefit (Present Value (PV)) (£m)		
			Low: -£56.9m	High: -94.9m	Best Estimate: -

COSTS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	-£0.2m		£0.5m	**£56.9m**
High	-£0.3m		£0.9m	**£94.9m**
Best Estimate	-£0.2m		£0.7m	**£75.9m**

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

1. *Application outcome* **(for both OAVA and PPVR)** – The analysis estimates that the cost of informing absent voters of their outcome will be £23.1m under the central scenario
2. *ID checking* – The introduction of ID checking is expected to cost £23.4m under the central scenario.

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

Police investigation and justice system costs – The introduction of this policy may have wider impacts on the justice system, but the costs for this are estimated to be minimal.

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

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

There are no monetised benefits associated with this policy.

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

Increased safeguards to prevent electoral fraud, and greater confidence from the electorate in these safeguards - The introduction of a three-year limit on postal vote applications, and limitation to 4 votes per proxy is intended to tackle electoral fraud and add more rigour to the security of statutory polls.

Increased engagement from eligible electors – The convenience of applying for an absent vote online, in the same way that people are currently able apply via the online Register to Vote service, will work to remove barriers by extending the application process beyond the existing paper-based journey. This may mean that more eligible electors - particularly from less engaged groups - apply for a postal or proxy vote.

Key assumptions/sensitivities/risks	Discount rate	3.5%

1. *Increase in volumes following the introduction of the online system* – There is a high degree of uncertainty over the volumes of additional absent vote applications that could occur following the introduction of the online system.
2. *Proportion of applications that go through the exceptions and attestations process* – The current data is taken from the Electoral Commission (EC) between 2017-19 however, that included local data matching step which this policy will not include.

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	

Evidence Base

A. Problem under consideration and rationale for intervention

1. The Elections Act 2022 enabled a range of changes with the aim of strengthening the integrity of our electoral system and ensuring that our elections remain secure, fair, modern and transparent. The Act included measures to enhance the integrity and accessibility of the absent voting (postal and proxy) process, particularly in response to concerns regarding the potential for fraud.

2. Under existing legislation, electors applying for a postal or proxy vote arrangement are required to provide their personal identifiers (signature and date of birth) as part of their application. These identifiers were introduced as an anti-fraud measure, and for postal voting they are used to check that the ballot is completed by the registered elector. Applications for an absent vote are not, however, subject to any processes which check their identity to ensure they are being made by the elector. As a result, there is a risk that this system could be exploited by unscrupulous actors to steal multiple postal or proxy votes via multiple fraudulent applications. This risk could increase further with the introduction of an online application route. To limit the potential for fraudulent applications, and to improve public confidence in absent voting[1], the Government is introducing identity checks for postal and proxy applications.

3. Currently, electors can apply for and hold a postal vote arrangement on an indefinite basis or for a set period which can be longer than 3 years. Once an arrangement is in place, the elector is only required to update their personal identifiers (signature and date of birth) every 5 years for the purpose of postal vote verification. Recommendation 22 of the report on electoral fraud by Lord Pickles, entitled 'Securing the Ballot'[2], recommended introducing a new requirement that electors have to reapply after a maximum of 3 years if they wish to continue voting by post. This will enhance the security of postal voting by ensuring that an elector's eligibility to vote by post is reviewed on a regular basis. By having to reapply at least every 3 years, electors will have a greater awareness of the arrangements they have in place. This can provide additional opportunities for electors to break free from a coercive situation, in which they have been put under pressure by an unscrupulous actor into having a postal vote or in appointing a proxy who could then effectively steal their vote.

4. The Pickles Review of Electoral Fraud also recommended changing the limit on the number of electors for whom someone is able to be appointed to act as a proxy. Under previous legislation a person could act as a proxy for 2 electors and an unlimited number of close family members in every electoral area. This means they could act for 2 electors in every constituency at a UK Parliamentary election as well as using their own vote – this would enable someone to hold many votes at local elections. There are concerns that the rules could give rise to situations whereby many electors are coerced into appointing one of a group of people as proxies, who could then effectively use those proxies to decide the outcome of a poll. In order to mitigate the potential fraud risk, there will be a new limit of four on the number of electors for whom someone can act as a proxy (of which no more than two can be domestic electors – that is, those who are not overseas or service voters).

5. In addition to changes to improve the security of absent voting, the Government is also modernising the process by allowing electors (both domestic and overseas) to apply for a postal or proxy vote online. The existing absent vote application process is paper based, which can be cumbersome for both electors and Electoral Registration Officers (EROs), particularly in the run up to an election when there is often an increase in applications. Handwritten information can be difficult to decipher, and electors may be more likely to make mistakes (such as missing a section) on a paper application form. Introducing a new online absent vote application service will create digital processes that will reduce burdens on administrators and generally increase ease and accessibility for electors. This will also bring absent voting in line with the Register to Vote application process. The Register to Vote digital service has been in place since 2014 and has successfully protected the integrity of the process whilst delivering on accessibility for electors.

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[1] The 2022 Electoral Commission Winter Tracker highlighted that 23% of electors surveyed considered voting by post to be unsafe and at a risk of fraud.

[2] https://www.gov.uk/government/publications/securing-the-ballot-review-into-electoral-fraud

6. These changes to the way postal and proxy votes are processed will be implemented by the electoral sector. Engagement on the design and implementation of the measures has been carried out with stakeholders in the sector, including the Electoral Commission, Association of Electoral Administrators, SOLACE and a range of individual returning officers, electoral registration officers (EROs) and electoral administrators.

7. The new absent voting measures will apply to polls for which the UK Government has responsibility (also known as reserved polls), and therefore the UK Government is best placed to introduce relevant legislation and support the implementation of these measures.

B. Policy objective and Proportionality

8. The Government is delivering the electoral integrity programme and in doing so is fulfilling its commitment to protect our democracy and ensure that it remains secure and fit for the modern age. It will do this via a range of measures impacting all aspects of the electoral system.

9. The effect of the measures contained in this statutory instrument is that, for reserved polls in England, Scotland and Wales, electors will:

    a. Be able to apply for certain types of absent vote arrangement online
    b. Be subject to an identity check as part of their absent vote application
    c. Be able to hold a postal voting arrangement for a maximum of 3 years (after which they will need to reapply to continue voting by post)
    d. Be able to be appointed to act as a proxy for up to 4 electors (no more than 2 of which may be domestic electors)

    The last measure (d) also applies to reserved polls in Northern Ireland.

10. The table below provides a summary of the policy objective for each of the policies, and the associated key performance indicators.

Table 1: Summary of policy objectives and key performance indicators

Policy	Objective	Key Performance Indicators
Postal and Proxy Revisions	Reduce risk of fraud occurring Enhance faith in the integrity of the electoral process	Levels of public confidence and trust in the integrity of the absent voting system. Awareness of new requirements amongst political parties, the public and campaigners.
Online absent vote applications and identity checking for absent vote applications	Make absent vote applications more accessible for electors Make absent vote applications more efficient for EROs to process Further modernising electoral Processes Make postal/proxy voting more secure	Efficiency and administrative burden for electoral administrators Public awareness of new Requirements. Accessibility of absent voting arrangements for electors, including overseas electors Levels of public confidence and trust in the integrity of the absent voting system.

C. Description of options considered

11. The options considered for this Impact Assessment are:

- **Option 0:** Do Nothing: The current system of absent voting would remain in place if no policy changes were made. This option does not provide for applications to be made online, for applications to be subject to additional identity checks (beyond existing checks on signature and date of birth), or for changes to postal and proxy rules.
- **Option 1:** PPVR Changes and OAVA (inc. ID Checks for applications): This option contains the changes resulting from the Elections Act 2022 provisions, which includes an identity checking process for absent vote applications, setting a maximum length of 3 years for postal vote arrangements and limiting the number of electors for whom someone can be appointed to act for as a proxy as well as the introduction of an online system for certain types of absent vote application. Further information on where the measures specifically apply can be found in Table 2. The modelling assumes that this option is expected to increase the volume of applications due to the introduction of the online system. **This is the Government's preferred option.**

12. Option 1 would deliver the UK government's objective of ensuring that elections remain secure, fair, modern and transparent.

D. Summary and preferred option with description of implementation plan

13. Option 1 will comprehensively address key vulnerabilities in the absent voting system and therefore best meets the objective of strengthening the integrity of absent voting. The legislative framework for the measures has been provided for in primary legislation as part of the Elections Act 2022, however secondary legislation is needed to implement the measures for reserved polls in England, Scotland and Wales (and also includes provisions relating to recall petitions in Great Britain and Northern Ireland).

14. The new online absent vote application services (OAVA) aim to make it easier for electors to apply for an absent vote and allow EROs to process applications more efficiently. This measure therefore complements the absent vote application measures, which will require some postal and proxy electors to reapply in order to maintain their existing arrangement when it expires.

15. The Representation of the People (Postal and Proxy Voting etc) (Amendment) Regulations 2023 provides the secondary legislation needed to implement the measures for reserved polls in England, Scotland and Wales (and also includes provisions relating to recall petitions in Great Britain and Northern Ireland). The Northern Ireland Office will in parallel introduce secondary legislation as required to apply the relevant measures in the Elections Act 2022 to reserved polls in Northern Ireland.

16. Subject to the passage of the secondary legislation, the absent voting measures are due to come into force on the 31st October 2023. The online absent vote application service will go live when the measures are commenced.

17. There will be transitional arrangements for long-term postal voters, to support the introduction of the 3-year postal vote reapplication period. The intention is to phase in the measure for these electors so they will have advance notice of the change, and to enable them to prepare for the administrative change.

18. Existing long term domestic postal voters will continue to be able to vote by post until 31 January 2026 following the commencement of the provision. As these postal vote arrangements will cease on 31 January 2026, this will give the elector time to apply for a fresh postal vote ahead of any scheduled elections for May in that year, if the elector wishes to continue to vote by post. The Electoral Registration Officer (ERO) will be required to send a notice to an elector who has an existing long-term postal vote arrangement informing them of the date (31 January 2026) on which their postal vote

arrangement will cease to be in force and information about how to make a fresh application for a postal vote.

19. Different transitional provisions will apply for overseas voters with a long-term postal vote. Going forwards, we are aligning the maximum period for which they may hold a postal vote with their registration cycle which will also be 3 years.

20. Under transitional arrangements existing proxy voters will need to reapply under the new requirements by 31 January 2024. Electoral Registration Officers (EROs) will be required, before 31 January 2024, to send a notice to existing proxy voters informing them of the date on which their proxy vote arrangement will cease to be in force and information about how to make a fresh application. Proxy voting transitional arrangements will ensure that existing proxy voters re-apply for their proxy arrangement to ensure it is in line with the legislative limits will also reduce the opportunity for an individual to act as a proxy for many electors over whom they may have inappropriate influence.

21. UK Government will create a digital system to facilitate online applications being sent from electors to EROs and support the processing of these applications. As part of identity checks, the digital system will carry out data matching between information provided by the applicant and records held by the Department for Work and Pensions. The results of this process will be shared with EROs.

22. Electoral Registration Officers and Returning Officers will be responsible for the operation of the new measures. Training will be provided to Local Authorities on the use of the digital service and any additional training needs will be funded via New Burdens funding.

23. The Electoral Commission issues guidance to electoral administrators relating to the administration and conduct of elections, including absent voting. This guidance will be updated as necessary to reflect the changes being introduced.

Table 2: Application of absent voting measures across the UK

Nation	Absent voting measures that apply	Elections where measures apply
England	- Online absent vote application service - Absent vote identity checking 3 year postal vote arrangement - New proxy limit	- UK Parliamentary Elections - Local elections - Mayoral elections (which include local and combined authority, London and London Assembly elections) - Police and Crime Commissioner elections - Local referendums - Recall of MP petitions
Scotland	- Online absent vote application service - Absent vote identity checking 3-year postal vote arrangement - New proxy limit	- UK Parliamentary Elections - Recall of MP petitions
Wales	Online absent vote application service	UK Parliamentary Elections

	• Absent vote identity checking • 3-year postal vote arrangement • New proxy limit	• Police and Crime Commissioner elections • Recall of MP petitions
Northern Ireland	• New proxy limit	• UK Parliamentary Elections • Northern Ireland Assembly elections • Local elections • Recall of MP petitions

E. Monetised and non-monetised costs and benefits of each option (including administrative burden)

E.1 Monetised impacts

E1.1 Methodology

Volumes

24. A combination of administrative and survey data has been used to estimate the total volume of absent vote applicants under the current and new system. The volume of electors who opt for an absent vote has been calculated using known postal vote or proxy vote stock per country over the previous 4 years, which is projected using ONS population forecasts. The percentage of electors who will be eligible to vote in planned elections was then calculated using data on which local authorities are due to hold planned elections and their respective electorates. This figure is then applied to the volume of electors opting for an absent vote. Our modelling also assumes that the introduction of the online system will see absent vote applications increase by 15%, and this is applied to our total volumes.

25. Applications will progress through a system of identity checks. The modelling uses data based on the EC analysis of the Modern Electoral Registration Programme evaluation data, to create the following assumptions:

    a. Stage 1 - Initial rejection - Of the paper applications, 10.9% will be initially rejected due to being illegible, compared to 100.0% of submitted online applications progressing.

    b. Stage 2 – Central government data matching - 91.3% of applicants who reach the subsequent central government data matching stage will pass.

    c. Stage 3 – Exceptions process – It is assumed that 9.8% will fail the central government data matching process and will need to undergo the exceptions process.

    d. Stage 4 – Attestation process - Based on the canvass data, 6.5% (of the 9.8% who go through the exceptions process) will fail and be required to submit an attestation.

    e. Stage 5 – Rejected applications - Finally, should the applicant fail attestation, they will fail the application process. With the additional rejected illegible applications, this totals to 16% of paper applications being rejected, and 5.8% of online applications being rejected. These percentages are used in combination with the predicted volumes of applicants to estimate the volume of applicants, both online and paper, who pass through each stage per financial year.

26. Similarly, with the three-year reapplication process (postal) and five-year signature refresh (proxy), the number of electors undergoing these stages is calculated in the first three years following implementation based on one third of the total postal voter stock plus the applications from three years ago, and the proxy voter stock five years ago, respectively, and following that based on just the volumes of applications from three or five years prior. An internal survey with local authorities revealed 34.7% of proxy applicants require a second reminder to refresh their signature currently, and that

15.9% of applicants sent a reminder to reapply do not. These percentages are also used in combination with the predicted volumes of applicants to estimate the volume of applicants who pass through each stage per financial year.

Costs

27. A range of data sources were used to estimate the total cost, including survey data, commercial estimates, and data from private beta testing of the online system. We have used internal survey data to estimate the average electoral registration admin staff wage per minute, and this is used in conjunction with the estimated staffing time required to perform each stage of the application process.

28. Where processing times varied due to a difference between online and paper applications, a weighted total cost per stage was calculated based on the relative proportions of applications received by each method. Multiplying this by the volume of applicants, as calculated previously, gives a total cost for this stage. There are also correspondence costs for each stage of an application, namely the cost of printing, postage, and an envelope for a one-, two- or three-page A4 letter sent within the UK. The size of the letter is dependent on the type of correspondence required for each stage. The cost of this is based on figures from Gov Notify.

29. The staff unit cost and correspondence unit cost were combined for each stage to give a total unit cost, and then multiplied by the volumes to give an estimated cost per stage of the application. These were then combined to result in several cost lines.

30. The modelling also includes an uncertainty range of 25% around the central scenario. All of the costs outlined below are <u>additional</u> to the current system.

31. A full breakdown of costs can be found in the section below.

Divergence

32. As outlined in the Table above, the implementation of OAVA/PPVR will diverge between England (where it applies to all elections), Scotland (where it applies to UK Parliamentary elections) and Wales (where it applies to UK Parliamentary and PCC elections), thus creating a divergence across the United Kingdom. The new proxy limit will apply to all reserved polls in Great Britain and Northern Ireland. It will still be possible for an elector to appoint a proxy on a long term basis at reserved elections (the 3-year reapplication measure does not apply to proxy voting).

Proxy voting in Scotland and Wales

33. For proxy voting in Wales and Scotland, the Electoral Commission is designing a combined application form for reserved and devolved elections. This form will request the applicant to provide the same information as is currently required to apply for a proxy vote for devolved elections plus any additional information required for reserved polls.

34. The modelling assumes that there would be no additional increase in proxy vote applications in Scotland or Wales as it assumes domestic proxy voters would use the combined paper form when applying for a proxy vote as there would not be an online route for devolved applications and that EROs will use the designs produced by the Electoral Commission. However, this is dependent on EROs choosing to use the EC's combined design and elector behaviour. As paper applications are more costly to process, costs are higher. Finally, additional communications will be required to communicate the outcome of each separate application, therefore an additional sheet of paper has been costed for.

Postal Voting in Wales & Scotland

35. The Electoral Commission have proposed that EROs will have the flexibility to choose between the combined forms and separate forms in Scotland and Wales. For the purpose of the modelling, it is assumed that EROs choose a separate form as this is more costly and is therefore a more conservative approach.

36. This option consists of assuming that the new policy will run in parallel with the current policy in Scotland and Wales. Therefore, electors can apply for a postal vote for devolved elections via the paper form, and remain on the five-year signature refresh pathway (with no ID check), but should they wish to have a postal vote for the reserved elections, they will need to apply, either by paper or online, with an identity check, and be attached to the three-year reapplication cycle. This will also necessitate an additional reminder communication and an additional outcome communication relative to the pre-policy implementation scenario.

E1.2 Direct monetised costs

Application to Register for an absent vote

37. Electoral service teams will face additional costs relating to processing the initial stages of an online or paper application, prior to the identity checks, that are introduced through this policy change and due to the expected increase in the volume of applications. The cost is calculated by multiplying the volume of applicants by the cost of processing the initial stages of an application. The cost of processing the initial stage is calculated through the cost of staff multiplied by the average time taken to complete this stage. The modelling assumes that the application process will not begin until January 2026, however we assume that some (around 10% of the annual postal voter stock until 2025-26, at which point all remaining postal voters will be contacted to reapply) will choose to apply for a postal vote unprompted from January 2024 onwards.

38. Directly influencing this cost is the proportion of applications received online or via paper forms. This is because processing the initial stage of a paper application is more costly. It is expected that most applications will be received online, with an assumption of 86% online and 14% paper applications. Research suggests that most applicants will prefer to complete an absent vote online. IPSOS conducted a Public Opinion Survey[3] and it found that 69% would prefer to apply for a postal or /proxy vote online, however reasonable demand for a postal application form is still seen, with 20% preferring to apply by post. This is not directly comparable as it does not account for the additional applications seen through the addition of an online system. Similarly, there was a large demand for online applications with other elections services, such as registration volumes data, which saw 98% of applications received online ahead of the May 2023 elections. However, this is not directly comparable due to the lack of a legacy postal application system prior to the introduction of the online system.

39. The total additional cost of application to register for an absent vote as a result of this policy is estimated to be between **£4.1m and £6.9m, with a central estimate of £5.5m (23/24 prices, 10-year PV)**.

ID Checking

40. With the new application processes, an identity checking stage will be introduced. This will mean that the identity of all applicants will be tested through their national insurance number. Where they fail this check, they will need to go through the attestation and exceptions process. Estimates have been calculated for the proportion of all applicants that will undergo each stage, based on the proportions of people who pass or fail the previous stage. This translates to all eligible applications undergoing DWP matching, 9.8% of those for exceptions process, and 6.5% of those for attestations. The modelling estimates that the attestation process will take around 12 minutes if processed by post or 8 minutes if processed by email and the exceptions process will take around 13 minutes if processed by post and 9 minutes if processed by email respectively. These estimates are based on a 2022 Survey conducted with Local Authorities, when asked how long it takes to perform each task on average.

41. The total additional cost of ID checking as a result of these policies is estimated to be between **£17.6m and £29.3m, with a central estimate of £23.4m (23/24 prices, 10-year PV)**.

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[3] This will be published in due course

Absent Vote Cycle Changes

42. The costs associated with this are a letter informing the elector of the reapplication process, reminders for those who have not refreshed their signature immediately, and removal from the list should they not refresh their signature or reapply. We estimate currently there are costs of £0.56 per elector to send a signature refresh reminder, and £2.17 to process a signature refresh. With the policy changes all applicants who would have been told to refresh their signature will now have to complete a new application every three years, rather than refresh every five. Therefore, the cost of a reapplication is equal to the cost of a new application, and subsequent identity checks. The need to reapply more frequently is the key influence in increasing the long-term costs.

43. The total additional cost of Absent Vote Cycle Changes as a result of this policy is estimated to be between **£0.4m and £0.7m, with a central estimate of £0.6m (23/24 prices, 10-year PV)**.

Application Outcomes

44. Communicating the outcome of an electors absent vote application is an additional cost due to the fact that the analysis estimates a 15% increase in applications as a result of the introduction of the online system as well as the more frequent reapplication process. This includes the cost of communicating both a regular or temporary successful application, or a rejected application. These are always sent via a one page, A4 letter. This is combined with the calculated staff cost per letter and results in the cost of communicating an outcome to an applicant at £0.56.

45. The total additional cost of application outcomes as a result of these policies is estimated to be between **£17.3m and £28.8m, with a central estimate of £23.1m (23/24 prices, 10-year PV)**.

Voting in national elections

46. The introduction of the policy is also expected to see an increasing in voting costs at national elections (Parliamentary and Police and Crime Commissioner) as there will be a greater number of postal voters (due to the introduction of the online system).

47. With the current estimation of the timeline of future General Elections, costs have been allocated in years where a UK Parliamentary election will likely occur. The model estimates that there would be a cost of £1.96 per elector for a postal ballot, based on internal cost modelling, and the fact that all of the postal vote stock will require one ballot. This unit cost includes factors such as printing and stationary with respect to poll cards, postage and delivery of poll cards, and staffing costs for preparation and verification of postal ballots.

48. The total additional cost of voting in national elections as a result of these policies is estimated to be between **£8.2m and £13.6m, with a central estimate of £10.9m (23/24 prices, 10-year PV)**.

Voting in local elections

49. Similarly to Parliamentary Elections, funding is allocated based upon the cost of a postal ballot in a local election. A postal ballot is estimated to cost £1.75 per elector for local elections based on internal cost modelling. This unit cost includes factors such as printing and stationary with respect to poll cards, postage and delivery of poll cards, and staffing costs for preparation and verification of postal ballots.

50. The volume of electors requiring a postal ballot is calculated through the percentage of electors eligible to vote in a local election each year, and of these, the estimated postal vote stock per local election. This is then estimated by the unit cost above to estimate the total voting cost for local elections and includes factors such as printing and stationary with respect to poll cards, postage and delivery of poll cards, and staffing costs for preparation and verification of postal ballots.

51. The total additional cost of voting in local elections as a result of these policies is estimated to be between **£8.3m and £13.8m, with a central estimate of £11m (23/24 prices, 10-year PV)**.

Training costs

52. Funding will be provided to local authorities' electoral services teams to support the delivery of the policy. Funding will be provided for one day of training on the legislative changes and one day of training on the ERO portal. Training attendance was estimated at £200 per day per trainee based on commercial pricing for face-to-face training. Funding is provided for all staff from electoral services teams, estimated based on the survey to electoral services teams which asked about staffing.

53. **The total additional cost for training as a result of these policies is estimated to be between £0.1m and £0.2m, with a central estimate of £0.2m (23/24 prices, 10-year PV).**

By-elections

54. By-elections occur when an elected office is vacated prior to an 'ordinary' scheduled or general election. Persons may also wish to submit an absent vote at these by-elections. The modelling assumes that there are 568 by-elections annually with an average electorate size of 6,000. This incurs the cost through sending additional postal packs out.

55. The total additional cost of by-elections as a result of these policies is estimated to be between **£0.9m and £1.5m, with a central estimate of £1.2m (23/24 prices, 10-year PV)**.

E1.3 Indirect monetised costs

More people opting for postal or proxy votes

56. Due to the ease of an online application system, it is anticipated that more people will apply for a postal or proxy vote, which will cost the government more than a vote cast in person would. The increase in absent voters owing to the online system is unknown, however within modelling a 15% increase is used based on volumes in Scotland during the Coronavirus pandemic when electors were heavily encouraged to apply for an absent vote.

E1.4 Direct monetised benefits

57. There are no direct monetised benefits associated with this policy.

E1.5 Indirect monetised benefits

58. There are no indirect monetised benefits associated with this policy.

E1.6 Summary

59. The total NPSV of OAVA/PPVR is estimated to be between £56.9m and £94.9m with a central estimate of **-£75.9m (23/24 prices, 10-year PV)**. This has been outlined in the table below.

Table 3: Summary of OAVA/PPVR NSPV

	Lower	**Central**	**Upper**
Application to register	£4.1m	£5.5m	£6.9m
ID checking	£17.6m	£23.4m	£29.3m
Application outcome	£17.3m	£23.1m	£28.8m
AV cycle changes	£0.4m	£0.6m	£0.7m
Voting: Parliamentary elections	£8.2m	£10.9m	£13.6m
Voting: Local elections	£8.3m	£11.0m	£13.8m
Training	£0.1m	£0.2m	£0.2m
By-elections	£0.9m	£1.2m	£1.5m

Total cost	£56.9m	£75.9m	£94.9m
NPSV	-£56.9m	-£75.9m	-£94.9m

Figures may not sum due to rounding

E.2 Non-monetised impacts

E2.1 Direct costs

60. There are no non-monetised direct costs associated with this policy.

E2.2 Indirect costs

Police investigation and justice system costs

61. Four new offences have been introduced relating to the misuse of data handled during the data matching process. The new offences are very similar to several already in place, in respect of misuse of data transferred during data checking for different electoral processes. Given that HMG, Electoral Commission and electoral sector records do not highlight any cases or prosecutions made under to similar existing offences, including Regulation 29ZB(6) of the 2001 Regulations, which came into force in June 2014, and Regulation 32ZBC(2) which came into force in 2019, there are no anticipated costs relating to the police investigation or justice system due to these new offenses.

E2.3 Direct benefits

Quicker processing times for EROs due to the introduction of the online system

62. The introduction of the online system is expected to lead to quicker application processing times. We expect this to deliver similar efficiencies as the online Register to Vote application service did for registration application processing when it was introduced in 2014. Digital testing of an early prototype suggested that the processing times of online absent vote applications could be up to five times quicker than paper applications. User testing of both the citizen facing and electoral administrator components are a core part of our ongoing digital development of the service and   insights gathered from this process will support in realising similar efficiencies in the live service. These savings from the introduction of the online system are expected to outweigh the costs of implementing the wider policy changes in the first two years of the policy (2023/24 and 2024/25) as the postal voters will not be required to reapply under then new system until after 31st January 2026.

63. *Increased safeguards to prevent electoral fraud, and greater confidence from the electorate in these safeguards*

64. The changes related to the OAVA/PPVR policy feed into the wider objectives of the Elections Act, which will ensure the UK's elections are modern, fair, transparent and secure. The introduction of a three-year limit on postal vote applications, and limitation to 4 votes per proxy is intended to tackle the risk of electoral fraud and update the security of the ballot. The introduction of identification checks will also increase safeguards to prevent electoral fraud. This may increase the confidence in the public of the security of the electoral system. An increase in faith in the electoral system may give some electors the confidence to apply for an absent vote arrangement, which could lead to an increase in participation.

Increased engagement from eligible electors

65. The convenience of applying for an absent vote online will work to remove barriers by extending the application process beyond the existing paper-based journey. This may mean that more eligible electors - particularly from less engaged groups - apply for a postal or proxy vote. For example, the IPSOS Public Opinion Survey[4] found that postal voters who are aged 18 to 34 (5%), ethnic minorities (5%), social renters (5%), those with a disability that limits their activity a lot (4%), and whose condition prevents them from voting in person (10%) typically found the current postal vote process more difficult,

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[4] This will be published in due course

although it was still the case that the vast majority belonging to these groups found it easy to vote by post. We may, therefore, expect that people from these groups are marginally more likely to apply for an absent vote if the process is easier or more accessible to them, therefore increasing participation.

E2.4 Indirect benefits

Increased use of postage and printing businesses

66. Some stages in the new application processes require communications to be sent via post, or alternatively, the ERO may choose to communicate via post. This cost passes on a benefit to the printing and postage firms contracted by the local authorities to produce this correspondence. This has not been quantified as the increase in profit for these businesses is not known.

E.3 Sensitivity Analysis

67. The above analysis models the central scenario. However, as there is inherent uncertainty with modelling need and the estimated uptake of the online system for postal and proxy vote applications, analysis has been conducted to estimate the upper and lower bound of uptake following the introduction of the online system. This is in line with Green Book principles.

E.3.1 Low cost scenario

68. In this scenario, it is assumed that the introduction of the online system <u>does not lead</u> to an increase in the volume of applications (i.e. there is no 15% increase in applications). It is also assumed that the split between online and paper applications is 98% and 2% respectively, based on registration volumes data from the run up to the May 2023 local elections. Under this scenario, **the estimated total costs £30.7m, thus leading to a central NPSV of -£30.7m (10-year PV, FY 2023/24 prices).**

E.3.2 High cost scenario

69. This scenario assumes that there is a 30% increase in the volume of applications following the introduction of the online system (i.e. double what the central scenario currently assumes). It also assumes that only 69% of applications are online whilst 31% are done via the paper route, as the IPSOS Public Opinion Survey[5] referenced in paragraph 39. Under this scenario, **the estimated total costs are £127.6m, leading to a central NPSV of -£127.6m (10-year PV, FY 2023/24 prices).**

Table 4: Sensitivity Analysis

	Low	Central	High
NPSV	**-£30.7m**	**£75.9m**	**-£127.6m**

F. Impact on businesses, trade and investments

70. The Business Net Present Value is expected to be £0 as there are no impacts on businesses which could be included in the scope of the BNPV. Whilst some businesses (for example, print and postage companies) may benefit from increased profit as a result of the introduction of this policy, it is not possible to quantify this due to a lack of available information around the profit margin of the businesses involved and is therefore excluded from the BNPV. Furthermore, additional revenue from postal and production takes place via local authorities and thus is deemed indirect. It is therefore excluded as a business impact.

71. There are no impacts for trade since this domestic policy affects the electoral system rather than businesses. There are no direct impacts for investment.

G. Risks

Uncertainty around the impact of the online system on application numbers.

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[5] This will be published in due course

72. The introduction of the online system is expected to increase the number of absent vote applications given the ease for electors to apply for an absent vote compared to the current method of via post.

73. However, there is little evidence to estimate what this uptake will be given the online system is new. Evidence from Scotland generally found that there was a 15% increase in absent vote applications, and this has been used in the model. Between 1st October and 26th November 2020, 8 by-elections were held in Scotland, and with the context of Coronavirus and the associated restrictions, electors were heavily encouraged to apply for an absent vote rather than attending polling stations in person. This saw an increase in applications by 15%. While this does not represent the availability of an online system, it may represent the actions of voters when made more aware of an absent voting system. Nevertheless, the assumption of a 15% increase is uncertain.

74. However, sensitivity analysis has been conducted above (see section E.3) which outlines the consequential impacts of changes this assumption on the total costs.

The proportion of applications that are received via post and via the online system.

75. There is also a degree of uncertainty around the proportion of applications that are expected to be made via post compared to the new online system. It is expected that the majority of applications will be made online, as the system will be more accessible, and faster, than applying via post.

76. Applying online is also more cost effective for both the elector and the ERO, as postage and production is not required, and it will be quicker for the ERO to process an online application compared to a paper application. The cost model assumes that 86% of applicants apply online and 14% apply via post. This is derived from the split of Register to Vote applications made over the previous three years.

77. It is assumed that this will be similar for OAVA, however as the demographics of absent voters typically differ from those simply registering to vote, the split may vary. For example, data from the Voter Authority Certificate found that 98% of applications were received online compared to just 2% by post or in person. However as this is a new service, whereby no postal system existed beforehand, this is unlikely to be a realistic assumption for OAVA. Similarly, in the IPSOS Public Opinion survey[6] findings show that out of current postal and proxy voters, only 69% would prefer to apply online, and 20% by post. As this was only of current postal and proxy voters, it does not account for the anticipated increase in voters owing to the online system, of which would be applying through the online pathway, thus increasing the proportion of postal voters.

The volume of applicants who go through the additional stages of the application process (such as the attestation and exceptions process)

78. If an applicant does not pass the initial identity check stage and wanted to continue with their application, their ERO may ask them to provide documentary evidence, known as the exceptions process. If this is not sufficient, they may be referred to the attestations process. While the cost of one applicant going through one process can be estimated, there is insufficient data to provide a thorough estimate of the volume of applicants going through each stage.

79. The data used to provide model assumptions is sourced from the Electoral Commission, for Register to Vote (RtV) application data, and details the number of people in 2017-19 who passed through each of the following stages: DWP matching, local data matching, documentary evidence, and attestation. A crucial point to note is the inclusion of an additional stage within this data – local data matching. Therefore, although the percentage of people passing each stage included within OAVA was identifiable, there is some doubt that the percentage passing the stages that occur post-local data matching are robust.

The time taken to process the initial stages of an online application

80. The assumption used in modelling is that it would take 1.1 minutes to process the initial stage of an online application, and 5.43 minutes to process the initial stage of a paper application. This assumption

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[6] This will be published in due course

is sourced from research undertaken by Softwire on the processing time for online absent vote applications. However, as this online system has not yet been beta tested, this is uncertain and subject to change. Should the time taken be longer, costs will increase.

H. Wider impacts

81. Under the Equality Act 2010, Section 149 (1), we have a duty to consider the potential impact upon groups with protected characteristics of any legislation we introduce, including any mitigations that may be required. We have previously published an Equality Impact Assessment upon introduction of the Elections Act 2022 which covers postal and proxy voting revisions measures, and we have continued to consider equality impacts appropriately throughout the development of the secondary legislation and the new online applications service. It is our assessment that the measures contained in this statutory instrument will overall have a positive impact on protected groups – particularly as, by enabling online applications for the first time, a key element of the administration of elections: the process for applying for an absent vote will be more accessible to a wider range of citizens.

82. We have taken care to ensure that the new identity checking requirements within the process are proportionate and will not negatively impact any one specific group. The regulations mirror the current identity checking requirements and process followed under Register to Vote, whereby an elector either provides their NINO with their application, or has access to documentary exceptions and attestations avenues. As such, any elector who can register to vote will be able to also apply for an absent vote.

83. As older and disabled voters make up the largest proportion of absent voters, we consider that the protected characteristics of age and disability are the main groups of citizens who potentially may be impacted to a greater degree by these changes. We have therefore been careful to reduce any potential disadvantage affecting these groups, in three ways.

84. Within the legislation, there are requirements for EROs to issue advance notification communications and reminders to existing electors that will be affected by the new re-application cycle or proxy limit. These communications will be sent before the elector's arrangement ends under the transitional arrangements. This will ensure that anyone that will be affected by the changes will be given time and support in renewing their arrangements, so that they can keep their preferred voting arrangement in place.

85. The online user journey will enable applicants who are eligible to apply for a signature waiver. This means that they will be able to bypass the signature upload part of the journey, and request a signature waiver alongside the other information in their application. Signature waivers are necessary when someone has a disability or other condition which affects their ability to sign their name consistently. If signatures are inconsistent between a postal vote application and the return of the postal vote statement, the vote may not be accepted. By providing this functionality online, we are removing what could have been an administrative barrier disproportionately affecting disabled voters – in fact, we anticipate that this functionality will also make it possible for disabled electors using assistive technology to complete their absent voting and signature waiver application independently for the first time.

86. We are maintaining the current paper-form based route for all applications too. This will provide users who may struggle with digital services with a familiar way to apply for an absent vote, and will also ensure that applications that cannot currently be processed by the GOV.UK online journey at launch (i.e. applications for long-term proxies which require countersigned third-party attestations to be submitted) will remain available to electors who may need them. These applications will also be able to be submitted by electors to their EROs via email, so that electors eligible for them and who may find it difficult to physically post them due to their condition would not be disproportionately impacted.

I. Monitoring and Evaluation

I.1 Monitoring

87. A range of monitoring data will be collected to assess the impact of these policy measures on electors applying for an absent voting arrangement. This will include monitoring the volume of postal and proxy applications made online and via the paper route, and the volumes of applications that are rejected at each stage of the new ID verification process, alongside estimates of the total number of postal ballots issued at elections. Monitoring data will also be collected to assess the how the policy measures affected administration and processing of absent voting applications by electoral administrators, alongside police data to monitor breeches and enforcement of the measures.

I.2 Evaluation

88. In addition to the monitoring data outlined above, the wider evaluation of the Electoral Integrity Programme will collect a range of data to assess the impact of the policy measures on voters and Local Authority electoral teams who will be responsible for implementing the measures. IPSOS's public opinion survey and qualitative research with voters who vote by post or proxy will be used to gather evidence on voters' experiences of voting by post or proxy and investigate wider impacts on attitudes to the electoral system and voting behaviour. Similarly, a survey of electoral teams in Local Authorities and complementary qualitative research with Electoral Administrators will be carried out to gather evidence on how the measures are being delivered and their impact on the sector.

89. The research and analysis carried out for the evaluation will be synthesised by an external research agency and published in a report following the next UK General Election