MODERNISATION OF THE ELECTORAL REGISTER IN IRELAND – REPORT OF PUBLIC CONSULTATION

Prepared by the Department of Housing, Planning and Local Government

housing.gov.ie
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1. Summary

The public consultation on a series of proposals to modernise the electoral registration process ran from 17 December 2018 to 15 March 2019. Views were sought on a series of proposals:

1. Simplification of forms and the process
2. A rolling electoral register (a continuous ‘live’ electoral register)
3. Optional online registration (with the option of registering with paper forms continuing) and secure self-service
4. A move to individual registration only
5. Enabling a single national electoral register database with unique identifiers
6. A move to verified identity using one’s Personal Public Service Number (PPSN)
7. Data sharing between public bodies and electoral registration authorities (local authorities) to maintain accuracy and comprehensiveness.

A significant awareness programme accompanied the consultation period to maximise awareness and encourage a wide range of people to input. 187 submissions were received from a range of individuals, community and voluntary organisations, Local Authorities, public representatives, political parties and other stakeholders.

In general, respondents were positively disposed to the proposals with notable numbers in favour of simplification of forms and processes; rolling registration and a single database. Opinion was more divided, though still positive, on identity verification using PPSNs and online registration. Issues raised related to implementation of those particular reforms. Individual registration and data sharing had the most mixed responses with respondents identifying a number of risks/issues with implementation, which are being very carefully considered.

On the four additional proposals (provision of a system of anonymous registration; improved provision for registration for those with no-fixed address; early registration for 16-18 year olds and the removal of provision for the edited register) although a smaller number of people responded specifically to these proposals, those that did overwhelmingly supported these reforms, with many organisations contributing detailed suggestions on implementation.

Overall themes arising in the consultation included:

- Respondents welcome measures to improve the security and accuracy of the registration process but want flexibility built in to maximise participation by all.
- Identity verification, Data protection and Privacy are key issues for respondents.
- Online options were welcomed but respondents are concerned about technical security, stability and resilience.
- A shift to individual registration needs to be approached with care to ensure those who are at risk of not registering, particularly those who need assistance to do so, are provided with appropriate options.
- There is a strong desire for continued publicity and awareness-raising on this project and related matters.

Work is now underway to further advance the modernisation project:

- Drafting of a General Scheme of a Bill: this will set out legislative proposals that will be sent to Government seeking approval for drafting of an Electoral Amendment Bill.
- Voter.ie is an online platform, piloted by the four Dublin Local Authorities in the run-up to the May 2019 referendum and local and European Parliament elections, which provides voters with an option of registering or changing their details online. The Department is working with Dublin City Council to evaluate voter.ie with a view to a national roll-out of an optional online registration service.
- Work is underway to develop the streamlined application forms – this will include consultation with all relevant stakeholders.

Updates on the project will be available at [www.registerreform.gov.ie](http://www.registerreform.gov.ie), (which redirects to the Department’s website [www.housing.gov.ie](http://www.housing.gov.ie)). Implementation of any changes to the electoral registration process will normally be accompanied by public information campaigns.

### 2. Background and Context

In March 2017, the Government determined that work should commence on modernising the voter registration process. A set of policy proposals was developed, with a view to consulting Local Authority Franchise staff in the first instance and then the wider public both to seek input to, and raise awareness of, a process of reform and modernisation. The proposals, which were based on the work of the Oireachtas Joint Committee Report on the Proposed Electoral Commission (2016), were:

1. Simplification of forms and the process
2. A rolling electoral register (a continuous ‘live’ electoral register)
3. Optional online registration (with the option of registering with paper forms continuing) and secure self-service
4. A move to individual registration only
5. Enabling a single national electoral register database with unique identifiers
6. A move to verified identity using one’s Personal Public Service Number (PPSN)
7. Data sharing between public bodies and electoral registration authorities (local authorities) to maintain accuracy and comprehensiveness

Views were also sought on provision of a system of anonymous registration; improved provision for registration for those with no-fixed address; early registration for 16-18 year olds and the removal of provision for the edited register.

**Initial Consultation with Local Authorities**

A survey seeking views was issued in July 2018 to all local registration authority Franchise teams. This was based on an initial series of proposals; including those made by the Joint Oireachtas Committee on Environment, Culture and the Gaeltacht in its report of the consultation on the proposed Electoral Commission in 2016. Local registration authorities are responsible for maintaining the register, work with the register year-round and are very familiar with the process and issues.
Further discussion took place with the Franchise teams at a feedback session, based on the survey responses, held during September 2018 in the Custom House. The teams were presented with an overview of the survey results, which showed, in general, high levels of support for all of the key proposals. These were in line with how beneficial they were perceived as being with regards to three criteria: for the public; for the integrity of the electoral register and for administration. Chart 1 illustrates this overview.

The full report of the consultation with Registration Authorities (Local Authorities) is available on the Department’s website.

Dublin Local Authorities pilot Voter.ie project

In parallel to this modernisation project, the Dublin Local Authorities have been working for some years on the development of an IT platform, Voter.ie, to make a number of critical improvements to the registration process.

The online portal, Voter.ie, went live across the four Dublin local authorities on 4 April 2019 in the run-up to the referendum and local and European Parliament elections held on 24 May 2019. Potential electors were offered the additional option of logging in to the system by means of MyGovID (which is optionally available to all those with a Public Services Card) in order to apply to register or amend their details online. The current nationwide facility, www.checktheregister.ie which is a look-up facility only, re-directed voters living in the four Dublin authorities to Voter.ie, providing the additional options for those voters. The pilot was facilitated by a change to identity verification requirements in respect of addition to the supplementary register, allowing for an online check rather than a visit to a Garda station.

This facility was an optional facility and voters still availed of the current system of applying via the paper application Forms, where that was their preference.

Dublin City Council have reported, in an initial evaluation, that they consider the Voter.ie system to have performed very well. While most voters were still using the current application process, Dublin City

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Council were encouraged with the use of the pilot online system – 16% of applications were performed online across the four Dublin Local Authorities with 66% of those being for new applications (i.e. first time registrations).

Given the initial need to focus on the policy issues, the public consultation did not explore the possibility of using Voter.ie as the new IT platform to advance the modernisation process. However, the successful pilot of Voter.ie means that consideration can now be given to bringing the two projects together. As part of the implementation proposals for the wider modernisation programme, a robust and independent evaluation of Voter.ie will consider the security and data protection elements of the platform to confirm whether they are:

- Technically secure and robust
- GDPR compliant – Privacy/Data protection by design and default
- Fully capable of meeting user needs including accessibility and flexibility
- Sufficiently adaptable to take account of future changes, e.g. population increases or any future legislative change.

More information on this is set out below at Appendix 1 – Voter.ie – Pilot Project by the Dublin Local Authorities.

Current state of Play on wider Electoral reforms
A number of other policy changes are being considered and developed in the Franchise (electoral) policy area. These are subject to separate processes but some are linked with the register modernisation process.

Electoral Commission
The Programme for a Partnership Government (2016) identified the need for Ireland to have an independent electoral commission as a matter of priority. The examination of the voter registration process was proposed as a task for the proposed new body.

The Joint Oireachtas Committee on Environment, Culture and the Gaeltacht published a report on the establishment of an electoral commission in January 2016. This report contains a series of recommendations regarding the establishment of an electoral commission, including which functions should be assigned to it; independence, membership and accountability mechanisms; and the establishment process.

A public consultation on a Regulatory Impact Analysis (RIA) for the Establishment of an Electoral Commission was launched on 28 December 2018 and closed on 15 March 2019. The RIA set out a number of options for establishing an electoral commission, including functions that might be assigned to it. These options had regard to the recommendations of the Joint Oireachtas Committee on Environment, Culture and the Gaeltacht.

Informed by the aforementioned reports and consultations, the Government approved the establishment of an electoral commission on a statutory basis on 17 July 2019. The electoral commission will bring together several electoral functions in an independent, dedicated public body. It will also include a new research and advisory function, which will inform the Government and Oireachtas in their consideration of reform to electoral law. Work has commenced on the drafting of a General Scheme of an Electoral Commission Bill.

Votes for citizens abroad in Presidential elections
Part of the impetus for this register modernisation project was the Government decision in March 2017 to accept in principle the main recommendation in the Fifth Report of the Convention on the Constitution that citizens outside the State, including citizens resident in Northern Ireland, should have

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the right to vote at presidential elections and that a referendum be held to put this to the people. It was in this context that the Government determined that work should commence on the modernisation of the voter registration process to effect improvements in the registration of voters, which could also facilitate the registration of voters resident outside the State in the event of an extension of the franchise being approved by the people in a referendum. The Thirty-ninth Amendment of the Constitution (Presidential Elections) Bill 2019 was published on 16 September 2019 and sets out the proposed changes to the Constitution that will be put to the people in a referendum in due course.

Seanad Reform
Following on from the publication of the report of the Working Group on Seanad Reform in 2015, which was chaired by Dr Maurice Manning (“the Manning Report”3), a Seanad Reform implementation group, Chaired by Senator Michael McDowell issued its Report4 in December 2018. Among the recommendations of that report are the establishment of a Seanad Electoral Commission to manage voter registration for a proposed newly expanded electorate and having a separate Seanad electoral register. The report was debated in the Seanad on 24 September 2019 and the Dáil debate on the Report took place on Thursday 7 November 2019.

3. The Public Consultation
Following refinement of the proposals on the basis of Local Authority inputs, the Public Consultation Process was launched by Mr. John Paul Phelan, Minister of State for Local Government and Electoral Reform at the Department of Housing, Planning and Local Government on 17 December 2018.

The awareness campaign
Given the importance of the electoral registration process, a significant awareness campaign was undertaken to support the consultation and maximise awareness of the process with a view to promoting the widest possible engagement by all stakeholders, in particular members of the public.

At the consultation launch Minister Phelan outlined the key proposals and invited submissions from all interested parties, with a deadline of Friday 15 March 2019 for receipt. Consultation documents (in summary, short-form and a more detailed long-form versions) were made available. A copy of the summary of the consultation is at Appendix 2—Summary Document. A further press release was issued by Minister Phelan on 11 March 2019, as the consultation deadline approached, (see Appendix 3—Press Releases) again urging engagement with the consultation and asking for views on the proposals to modernise the electoral registration process.

More detailed information regarding the awareness campaign is set out below in Appendix 4—The Public Consultation Process—Awareness campaign.

Overview of responses
A total of 187 submissions were made in respect of the public consultation phase up to the deadline of 15 March 2019.

Submissions were received from a range of individuals, community and voluntary organisations, Local Authorities, public representatives and political parties. The submissions received provided an overview of the general views, issues and concerns across the range of all respondents.

3 Report of the Working Group on Seanad Reform 2015
4 Report of the Implementation Group on Seanad Reform 2018
Chart 2 provides a breakdown of all 187 submissions received by source. Of the overall 187 submissions, 72% were made by individuals, with 14% made by representative organisations or groups. In addition, three political parties made submissions along with eleven public representatives and ten Local Authorities. The relatively low percentage of submissions made by local authorities may be the result of the previous consultation process held in the latter part of 2018 with the local authorities directly.

Of the 187 submissions received during the consultation process, some were general comments regarding the register itself, some were comments regarding the modernisation process in general and some referred to a specific proposal, or proposals, only. The quality of submissions was very high with all addressing key points in a constructive way and in many cases making valuable suggestions either for consideration in implementation or mitigation measures for some of the risks identified.

There were also some comments that were outside the scope of this project – relating to expanded postal voting categories; proxy voting; votes for citizens abroad; online voting and changes to polling times, practices at polling stations.

All submissions are available at www.registerreform.gov.ie (this redirects to the website of the Department of Housing, Planning and Local Government).

Breakdown of submissions
Chart 3 shows the number of submissions that specifically referred to each particular proposal in consultation documents:
Views on key proposals

Table 1 shows the number of submissions that referred to each of the 7 Key Proposals and their views of being a) in favour, b) in favour with reservations, or c) not in favour.

**Table 1 Responses in relation to the seven key proposals**

<table>
<thead>
<tr>
<th>Key Proposal</th>
<th>Number of total proposal-specific views</th>
<th>In Favour</th>
<th>In Favour – with Reservations</th>
<th>Not In Favour</th>
</tr>
</thead>
<tbody>
<tr>
<td>Simplified Forms &amp; processes</td>
<td>38</td>
<td>37</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Rolling register</td>
<td>31</td>
<td>27</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>Optional online registration</td>
<td>69</td>
<td>45</td>
<td>20</td>
<td>4</td>
</tr>
<tr>
<td>Individual registration only</td>
<td>30</td>
<td>14</td>
<td>5</td>
<td>11</td>
</tr>
<tr>
<td>Single National database - with unique IDs</td>
<td>43</td>
<td>32</td>
<td>5</td>
<td>6</td>
</tr>
<tr>
<td>PPSN for ID verification</td>
<td>91</td>
<td>66</td>
<td>9</td>
<td>16</td>
</tr>
<tr>
<td>Use of data sharing</td>
<td>30</td>
<td>11</td>
<td>11</td>
<td>8</td>
</tr>
</tbody>
</table>

Chart 4 illustrates Table 1 - i.e. the number of submissions that referred specifically to each of the 7 Key Proposals - and the views of being a) in favour, b) in favour with reservations, or c) not in favour. Notable points include the high number of submissions in relation to identity verification and the high numbers responding positively to what might have been expected to be one of the more controversial elements of the proposals in that it proposes an additional check in the system. The significant numbers expressing reservations in relation to optional online registration appears to relate largely to concerns about the possible removal of a paper or offline option and concerns around means of access and security.

The issue of individual registration, while having a relatively small proportion of overall responses shows the highest proportion of numbers against its introduction. The main reasons given for this response are concerns about losing people from the register when they are not registered by others. It is a reform
that can have complex effects on the register and will need very careful consideration, particularly in respect of the implementation of the requirements of the General Data Protection Regulation (GDPR), which has been in force in Ireland since May 2018.

The use of the data sharing is one that most split responses – this reflects the importance of ‘pinning down’ what data is intended and how it would actually work in practice. Respondents are concerned, partly about what some termed ‘mission creep’ but also by practical issues such as how up to date data coming from other sources might be. The interplay of people updating their own details and bulk imports of data is also an obvious area of complexity.

Simplified forms and processes is a clear favourite among respondents with almost all who commented being in favour – the only reservations being around the potential complexity of any new form and its resulting accessibility, particularly for those with literacy issues; intellectual disabilities or for those whose first language is not English/Irish.

Chart 5 shows the degree to which each key proposal was fully favoured by submitters, in order of highest to lowest percentage of those in favour, when they commented specifically on a particular proposal.
Views on the additional four proposals

Chart 6 shows the number of submissions that referred to each of four additional Proposals and their views of being a) in favour, b) in favour with reservations, or c) not in favour. In responses that addressed these proposals the majority were in favour of implementation, with many mentioning the need to ensure that people were not disenfranchised as a result of their circumstances. The somewhat greater ‘reservations’ in relation to anonymous registration reflects issues around implementation with concerns about how it would work both for the people needing to avail of it and for the integrity of the register.
Key Themes Arising

Respondents want increased integrity while ensuring flexibility to maximise participation
Respondents acknowledge the importance of verification and checks and balances in the system but many also highlighted the need for flexibility to ensure everyone could participate and exercise their democratic rights. e.g. the paper process to continue; help with registering; more attention to disadvantaged groups or those less likely to vote; language considerations and in some cases offering alternatives to PPSNs for people who might not have them.

Identity verification, Data protection and Privacy are key issues for respondents
Comments on the proposal for use of the PPSN for identity verification were by far the most common. Almost half of all respondents commented on it and the majority of these are in favour of the PPSN being used in some secure and limited way to ensure that each person is only on the register once. The full utilisation of Eircodes for furnishing the register addresses was also recommended by a number of respondents.
Respondents also expressed caution about the use of certain forms of ID verification, some referencing the Public Services Card, with specific concerns around any possible mandatory requirement. Flexibility regarding identity verification was sought by a number of respondents – particularly those representing migrants or refugees, for example, who may genuinely struggle to present specific documents and might need a little flexibility to allow them to exercise their democratic rights in line with the eligibility criteria set out in the Electoral Acts.

Online options welcomed but technical security, stability and resilience are critical issues
Some concerns about the creation of a single national database were raised, but many also welcomed the idea and the benefits it would bring subject to rigorous security standards being applied across the system. Security and resilience of such a crucial piece of infrastructure was highlighted by many as a key concern. Protection of data from malicious actors; accidental breaches or deliberate unauthorised amendment were also mentioned by respondents. Some called for full tracking of all changes to any records highlighting the extreme distress of being disenfranchised where records appeared to be changed without knowledge or consent of the individual.

A shift to individual registration needs to be approached with care
Concerns regarding a move to individual registration also raised the possibility of the risk of some household members or residents in the same address not being registered with the associated possibility of actually reducing the completeness of the register. The current household form used by authorities was seen by a number as important in gleaning all household members, which a form for individuals only may not capture. Interestingly, while many individuals cited the registration of young adults at the family home as key area of concern, youth organisations were in favour of individual registration. Organisations representing those who may need assistance to register, or who may live in congregated settings (e.g. nursing homes, direct provision centres, etc.) raised specific issues of concern and these will be taken into account to ensure that the system retains flexibility if possible to allow everyone to exercise their democratic rights in line with the eligibility criteria set out in the Electoral Acts, whilst meeting any requirements set out in the GDPR and the Data Protection Act 2018. The balance to be struck is between the right of all electors to be registered and their right to privacy and control over their data.

Strong desire for continued publicity and awareness raising on this project and related matters
The importance of publicity and awareness campaigns in respect of modernisations or changes in the Register’s compilation/maintenance was another theme that appeared. A further consultation stage, prior to proposals being implemented was requested by a number of respondents, including a suggestion for an ‘engagement strategy’ to be developed to promote registration – some specific suggestions included supermarket based registration drives or targeted drives in large firms.
Some other concepts are worth clarifying here as they were referred to by many respondents.

- **Individual and State responsibilities for Electoral Registration.**
  Registration (Local) Authorities are responsible for creating and maintaining the electoral register. The current system is based on Registration Authorities building a register through house-to-house calls. The onus for delivering an accurate electoral register is on the Local Authority and the legislation provides that any person must provide any information requested in the preparation of the register. This is another important feature of our democratic process – everyone who is eligible to vote has a right to be included on the register - there is no provision for opt out or removing oneself – the choice all electors are entitled to make is whether to vote or not in any given electoral event. A number of respondents refer to the need for automatic registration for 18 year olds – this was also included in the programme for Government.

- **Transparency of the Electoral Register.** The register is a public document and needs to be open to inspection – it is a fundamental tenet of most democracies that electoral registers or electoral rolls are open for viewing. It is a protection for all of us and our electoral process that we can see who is eligible to vote. Additional consideration will be given to how best to maintain this level of transparency while protecting electors from any potential misuse of their data.

- **The register may only be used for electoral and other (very limited) statutory purposes, jury duty being one, and there are penalties in place for breaches.**

A summary listing of key summary points and next steps, which identify what we will do to take account of the consultation responses is set out below.
Summary of key points and next steps

<table>
<thead>
<tr>
<th>Proposal</th>
<th>Key points in summary</th>
<th>Next Steps – what we will do</th>
</tr>
</thead>
</table>
| 1. Simplified forms and processes | • Crucial that new form is clear and easy to follow – assistance from a range of bodies should be sought to ensure the form is accessible and easy to navigate.  
• Better to have more than one form than risk confusion  
• Awareness campaign needed for new forms | • A new draft form will be developed in consultation with Local Authority Franchise teams and representative bodies. The assistance of National Adult Literacy Agency (NALA) and other relevant bodies will be sought. Consideration will be given to translation.  
• Roll out of a new form will be timed to minimise any confusion with existing and future processes that might be affected by electoral events on the one hand or legislative change on the other. |
| 2. Rolling Register | • Rolling register seen as a good idea but needs a well-thought out implementation and change-over plan  
• Would end confusing of current registration system of draft, claims process, publication, coming into effect and supplement.  
• Possibility of surge in applications in the lead-up to electoral events. However, this already happens to a large extent with the use of the supplement and cut-off dates in the lead up to election days.  
• Consideration of a change on the cut-off dates for registration in the lead up to elections.  
• Regular register awareness campaigns | • Legislative analysis underway to develop a legislative proposal to introduce a rolling register  
• Implementation will be planned in consultation with Local Authority franchise teams to ensure a seamless introduction  
• Cut off dates will be considered in consultation with all relevant stakeholders with a view to getting the right balance of accessibility and workability.  
• Awareness campaigns will be developed to complement any new processes and the development of functions for an electoral commission will have regard to the need for ongoing awareness-raising in respect of voter registration. |
### 3. Optional online registration
- Retaining an alternative (paper based or offline) method of registration that is not discouragingly onerous is very important
- Reassurance is needed that online registration will not become mandatory
- Security and stability of online system is crucial
- Method of Individual Log-On (i.e. identity verification for security purposes) should be carefully considered.

- The Voter.ie pilot project in Dublin, which provides an optional online facility based on MyGovID, will be subject to evaluation in terms of both technical stability and security and data protection regarding its processes and procedures. On this basis a recommendation will be made to Government regarding a potential national roll-out of the platform.
- Consideration to be given to the best way of providing reassurance regarding the continuation of a parallel option in a paper based system.

### 4. Moving to individual registration only
- Concerns around the risk of loss of completeness if registering becomes reliant solely on the individual, especially among certain demographics, to be addressed.
- Crucial to retain the role of the state in compiling and managing the electoral register in order to protect the overall integrity of the registration process. This basic requirement must be retained while providing individuals with control over their entry on the register.
- Awareness that some individuals may need assistance to register and the process needs to be designed to provide for that assistance.
- Awareness campaign needed to ensure people are aware of both the process of compiling the register and their role in it.

- Legislative analysis to consider how the balance between the state elements of registration and the individual responsibility elements will sit together to maximise the integrity of the process and the register and respect data protection requirements.
- Identification of key demographics likely to be affected by the change and mitigation measures that might address the risk – the schools programme proposed was one suggested way of engaging young people who would no longer be registered on a household form.
- Consultation with representative bodies that might have insights into the type of assistance needed to register for some groups or specific cohorts to ensure the process is fit for purpose for all electors and potential electors.
- Consideration will be given to this issue and we will explore the option of an additional form for deletions from the register, including in cases where a person dies.

### 5. Enabling a single national electoral register database
- There are significant security concerns regarding a national database and these must be addressed
- Data protection and privacy will be critical
- Clarification of the role of individual local authorities in any move to a single register database.

- Consideration of the data protection and privacy implications of storing data in any electoral register database, along with the
### 6. A move to verified identity using PPSN

- Individuals tended to accept, some very positively, the potential use of PPSN
- Respondents seemed less sure about the Public Services Card/MyGovID with some groups calling any mandatory requirement for those channels of identity verification ‘unacceptable’. Flexibility on requirements was mentioned to ensure that everyone eligible to vote has the best change of registering.
- Guarantees regarding data protection and privacy should be built in to any solution

- Preparation of a data protection impact assessment and ongoing engagement with the Office of the Data Protection Commissioner (ODPC).
- Evaluation of the data protection policies and practices
- Consideration to be given to the best balance of ease of use/accessibility and proportionate use of data such as PPSN with a view to ensuring flexibility but also, as a priority, integrity and security.

### 7. Data sharing to maintain accuracy and comprehensiveness

- Acknowledgement of the difference between data sharing among local authorities only and data sharing between local authorities and other Government agencies.
- Data privacy and security referred to by many.
- Concerns regarding ‘mission creep’ – importance of data minimisation.
- Concerns about the validity, currency of data being shared.

- Consideration to be given to the best means of ensuring integrity of any data being included in the register and the protection of data on the register.
- Consideration of provisions and agreements needed, in line with the Data Sharing and Governance Act 2019, to enable the minimum data required to be shared between Local Authorities in the first instance to ensure the proper functioning of the register.
- Consideration to be given to a procedure/process to explicitly identify the steps (legislative or otherwise) to be taken to make any changes to the data sharing around the register, whilst maximising transparency and clarity about what data is shared, with whom and why.
| Additional proposals: | 1. Allowing provisional registration for 16/17 year olds | • Almost total support for this proposal, which is seen as one that would encourage engagement among younger people with the electoral process  
• Awareness Campaigns on registering and the electoral process is important  
• Processing of details of persons under 18 have additional requirements under the Data Protection Act | • Consider the data protection issues involved in processing data for under-18s and identify steps needed to implement  
• Implementation proposal to be developed in consultation with Local Authorities and representative groups. |
| | 2. Specific registration provision for people with no fixed address | • Full support for this proposal from respondents  
• Broad criteria suggested to maximise facilitation of those experiencing different levels of homelessness  
• Importance of considering how temporary accommodation might change a person’s constituency or polling place temporarily. | • Implementation proposal to be developed in consultation with Local Authorities and representative groups including consideration of address to be used. |
| | 3. Provision for anonymous registration for people whose safety may be at risk | • Consideration needed of best practice where this facility is available  
• Further consideration of how ‘certification’ should be handled to ensure the facility works for those who need it while protecting the integrity of the registration process | • Implementation proposal to be developed in consultation with Local Authorities and relevant organisations, taking account of international best practice. |
| | 4. Removal of provision for the edited register | • Overwhelming support for removing provision for the edited register, thus not allowing any use for marketing or any similar purpose. | • Legislative analysis to identify necessary changes to remove provision for the edited register  
• Consideration of any other steps needed for implementation e.g. highlighting what the register can be used for (electoral and other statutory purposes) and considering the existing penalties for improper use |
4. The Key Proposals – Responses

(Please note – the percentages referred to for those in favour/not in favour etc. refer only to those respondents who expressed a specific preference to a particular proposal.)

Key Proposal 1 – Simplification of forms and processes

From the Public consultation paper: There are currently multiple forms in use for the electoral register. Under this proposal this would be reduced to one or two forms with which to register or amend a record, and will be clear and user friendly. Similar streamlining of forms for postal votes or special voting arrangements will be considered.

Some 20% of respondents commented specifically on this proposal and an overwhelming 97% of those were in favour, the largest percentage of all proposals, as outlined in Chart 7.

Among those who commented on this proposal, there was an almost unanimous view in favour of simplified form(s) and processes. The few reservations revolved largely around the potential complexity of the task of condensing the information into a single form without overly complicating the form and making it inaccessible.

No objections were made to the proposal to simplify forms in general, with 20% of those who commented specifically agreeing with a single form. The need for clear and uncomplicated language in any new form(s) was mentioned a number of times. The Immigrant Council of Ireland had some concerns regarding the amalgamation of the current suite of forms to a single one, which could be confusing for some people in terms of locating the correct section. One commentator referred to the ‘challenge’ involved of reducing the current suite (24 forms in total), with their associated notes, to a single form. A suggestion for a separate single form for initial registration and then another form for any subsequent changes to a person’s details on the register was also made by a local registration authority.

This view is broadly in line with the views of the registration authorities – i.e. a simplified form which is easy to understand and complete, which may involve more than one form (for instance, one for the register and one for postal applications etc.). Registration Authorities also highlighted the need to be clear on what the electoral register could be used for and who has access to it (i.e. electoral uses (e.g. political stakeholders) and other statutory uses such as selection for jury duty).

Some respondents recommended that any changes and associated text should be done within the NALA guidelines on using plain English, which also suggests that forms include ‘visuals’ (for example a phone icon). The National Disability Authority also referred to a toolkit for forms it had available.

The other respondents who favoured this proposal, included a number of literacy, disability, student, older persons and civil liberty representative bodies covering a wide remit of
stakeholder groups. One person suggested that any titles (e.g. Mr, Ms, Fr, Sir) be removed from any forms. Making form(s) available in different languages was also mentioned. Greater clarity on the forms as to where they should be returned to was also suggested by some respondents.

The importance of an awareness campaign to accompany the new form(s) was cited by most as a critical factor in a successful implementation.

Key points in summary

- Crucial that new form is clear and easy to follow – assistance from a range of bodies should be sought to ensure the form is accessible and easy to navigate.
- Better to have more than one form than risk confusion
- Awareness campaign needed for new forms

Next Steps

- A new draft form will be developed in consultation with Local Authority Franchise teams and representative bodies. The assistance of NALA and other relevant bodies will be sought. Consideration will be given to translation.
- Roll out of a new form will be timed to minimise any confusion with existing and future processes that might be affected by electoral events on the one hand or legislative change on the other.

Key Proposal 2 - A rolling electoral register or continuous registration

From the Public Consultation Paper: This proposal would create a single “live” electoral register. It would mean that individuals could inspect the register at any time and submit updates or changes, whenever necessary, up to 14 days before any polling day. The day after polling day, the register would re-open and then be continuously updated until 14 days before the next polling day and so on.

16% of respondents commented specifically on this proposal with 96.8% of those in favour or in favour with reservations. Reservations related to the 14 day cut off referred to in the consultation paper – with respondents finding it either too long or too short and how the proposal would affect the availability of a printed hard copy of the register for inspection.

Chart 8 illustrates the percentage of respondents specifically in favour, in favour with reservations, or not in favour.

There was a general welcoming of this proposal which would enable a ‘live’ version of the register to be available which was seen as less confusing for voters, replacing the current system of draft register, claims process, publication of the register and coming-into-effect of the register. Questions did arise as to the best – earlier or later - ‘cut-off timeframe’ (i.e. a closing date for applications) in advance of electoral events and the risk of a possibility of a decline in accuracy was also mentioned.
Whilst agreeing with the proposal, some commentators mentioned the risk of a decline in awareness of the requirement to register with no defined period for compilation and no deadline dates for registration to ‘focus minds’, leading to a less accurate and complete register and a subsequent surge in applications previous to electoral event. Local authorities had previously commented on the potential risks of voter complacency with no deadlines, the loss of the ‘checks and balances’ of draft register process and also the possibility of peaks of applications in the lead-up to electoral events.

Questions were also asked about how long a rolling register would be valid - would it have a specified date for printing for those who wished to have a copy for electoral purposes? Others recommended shorter ‘cut off’ dates prior to electoral events, with voters able to register much closer in the lead up to polling day.

The National Youth Council of Ireland (NYCI) saw potential to address the ‘difficulties, anomalies and confusion’ of the current system though raised the possibility of last minute surges in applications pre-election events. It was suggested that regular awareness campaigns could counter this risk, adding to a general theme of regular electoral awareness campaigns throughout the range of submissions received, particularly among individual contributors.

One commentator referred to the distress of correspondence such as polling cards addressed to deceased persons and that a ‘live’ rolling register would aid in the relatively immediate removal of deceased person’s details. The issue of removing deceased people from the register was mentioned by a number of respondents.

An Post commented specifically in relation to the cut-off dates regarding their role in the distribution of the freepost electoral communications (litir um thoghcháin) to voters informing of electoral event details – the rolling register may have a repercussion as they currently require some two months’ notice of elections in order to prepare the address database for the circulation of the notice.

One respondent suggested having contingency plans in place in case of ‘breakdown’ of a live system.
One person disagreed fully, suggesting instead that there should just be an annual register with people having to re-apply each year, which would ensure no duplication of registration.

Key points in summary

- Rolling Register seen as a good idea but needs a well-though out implementation and change-over plan
- Would end confusing of current registration system of draft, claims process, publication, coming into effect and supplement.
- Possibility of surge in applications in the lead-up to electoral events. However, this already happens to a large extent with the use of the supplement and cut-off dates in the lead up to election days.
- Consideration of a change on the cut-off dates for registration in the lead up to elections.
- Regular Register awareness campaigns

Next Steps

- Legislative analysis underway to develop a legislative proposal to introduce a rolling register.
Implementation will be planned in consultation with Local Authority Franchise teams to ensure a seamless introduction.

Cut off dates will be considered in consultation with all relevant stakeholders with a view to getting the right balance of accessibility and workability.

Awareness campaigns will be developed to complement any new processes and the development of functions for an electoral commission will have regard to the need for ongoing awareness-raising in respect of voter registration.

Key Proposal 3 - Optional online registration and secure self-service

From the Public Consultation Paper: Online registration would allow people to choose to manage their own registration and updating of details. There will still be a paper process for anyone who prefers that. To ensure that people are who they say they are when they use the online system, we need to use secure identity verification technology. People already use MyGovID for some State services online, e.g. Social Welfare services. MyGovID is available to anyone with a Public Services Card. 2.7 million people already have one so this option will be available to them.

36% of respondents referred to this proposal specifically, with almost 65% fully in favour of this proposal, rising to just under 95%, when those in favour with reservations were factored in.

Chart 9 illustrates the percentage of respondents specifically in favour, in favour with reservations, or not in favour.

Of those in favour, most referred also to the fact that the option of retaining the current manual system was important to ensure that everyone could access their right to register even if they couldn’t or didn’t wish to use the online system.

This proposal is linked closely to the proposals for individual registration and the use of verified identification with their associated themes of increasing the accuracy of the register and data privacy and protection requirements and concerns.

The almost 95% in favour, with the caveat that it remains an optional facility, would seem to reflect the views of local authorities, where over 90% considered it very or somewhat desirable. The benefits an online facility would bring, in terms of ease of use, as well as the potential for increased accuracy of the register, were cited by respondents. The National Youth Council of Ireland considered that online registration would facilitate people without easy access to public offices and forms and would aid in promoting registration.

The reservations outlined refer to the keeping of an alternative method of registering (i.e. keeping the current system as an option for those not wishing to interact online. One respondent referred to a ‘digital divide’ between those comfortable with online interactions and those who are not. A small number of persons raised concerns about ‘mission creep’ and possible eventual mandatory online registration and so disagreed on this basis. Concerns about security and ensuring privacy was mentioned by a number of those respondents who had reservations. The Irish Council for Civil Liberties ‘strongly recommended’ against grounding any online registration system on the Public Services Card (PSC)/MyGovID system.
this view was also expressed by a number of individual respondents – though occasionally some of these were open to the use of PPSNs or PSC, provided it remained optional. Representative organisations such as the National Disability Authority, and the National Council for the Blind welcomed the proposal for online registration which should have features to ensure accessibility but also pointed out that certain groups may have difficulty in accessing or may not have the capacity to use, online resources.

Local authorities’ views of the desirability of an online system also highlighted the importance of retaining an alternative paper-based system, of the risk of users entering incorrect details and of ensuring the security of any platform for online registration.

Key points in summary
- Retaining an alternative method of registration that is not discouragingly onerous is very important
- Reassurance is needed that online registration will not become mandatory
- Security and stability of online system is crucial
- Method of Individual Log-On (i.e. identity verification for security purposes) should be carefully considered.

Next Steps
- The Voter.ie pilot project in Dublin, which provides an optional online facility based on MyGovID, will be subject to evaluation in terms of both technical stability and security and data protection regarding its processes and procedures. On this basis a recommendation will be made to Government regarding a potential national roll-out of the platform.
- Consideration to be given to the best way of providing reassurance regarding the continuation of a parallel and option paper based system.

Key Proposal 4 - Moving to Individual Registration Only

From the Public Consultation paper: Individual registration would mean that each person wishing to be entered onto the register or make any changes to their record would need to complete their own individual form. Currently a household form allows one person to complete the form on behalf of everyone at a given address for entry onto the draft register. While convenient for some – e.g. parents registering their adult children - it causes a number of issues in terms of data privacy, accuracy and identity verification. For example, in rental properties, some may not be included on forms. This has important impacts on the register’s accuracy and completeness.

Of those who commented on this proposal just over 46% were in favour of this it, rising to almost 63% in favour but with reservations. The figure of 37% not in favour is notable. Chart 10 illustrates the percentage of respondents specifically in favour, in favour with reservations, or not in favour.
The views on this proposal were mixed, with the highest percentage of respondents against this across all of the proposals. This seems to be based on concerns regarding a reduction in the completeness of the Register due to the reliance on a specific individual to register themselves.

This differs somewhat from the local authority views on this proposal, 85% of whom saw this as beneficial for improving the accuracy of the register. Some local authorities cited GDPR concerns of a single individual passing on the details of others, especially in non-familial households. Local Authorities did however, raise the issue of removing people from the register, as the household form currently being a key way in which a whole household can be removed and replaced when people move. Consideration will be given to this issue and we will explore the option of an additional form for deletions from the register, including in cases where a person dies. Australia, for example, has a simple form that allows submission of information by a family member that can then be cross-checked before any action is taken.

A fairly major concern, across both the public and local authority consultations, is that a move to individual registration only may have the effect of reducing the completeness of the register. The current household form, usually completed by a single person, allows for all residents to be registered. Doing away with this may lead to some individuals not registering separately and being removed. One body saw that this may affect young people in particular but considered that a schools programme combined with provisional registration might mitigate these risks. The National Youth Council on the other hand welcomed individual registration as a positive step forward on the basis that “many young people are very mobile and are renting and sharing accommodation where they might have no or limited engagement with other persons in a household. Some of the information required on the current RFA Electoral Registration form is sensitive personal data such as date of birth and not every person may be willing to share this information with others”.

The Labour Party opposed this proposal as there was a risk towards a drift to ‘opt-in’ to the Register. This is linked to points made by other political parties which also highlight the role of the state in ensuring an accurate and up to date registers, the Green Party and Sinn Fein both call for some degree of automatic registration. Consideration will be given to balancing the role of the State, which protects the right of each person to be registered, with the right of each individual to have control over their entry including its updating as necessary, as well as the necessity to meet any data protection obligations.

Inclusion Ireland raised the possible issue of persons living in residential communal facilities and the danger of them not registering individually. The National Council for the Blind Ireland (NCBI) expressed concern that certain cohorts of people may find individual registration difficult. Others, such as the National Disability Authority, Inclusion Ireland and NASC Ireland
(Migrants and Refugee Rights Centre) pointed out that some people, including those who live in specific congregated settings, may require help to complete an individual form. Assistance and supports may be needed for such persons, including through access to assisted decision making.

Again, bodies such as the Irish Senior Citizens Parliament, mentioned the importance of information campaigns and the general theme of regular awareness campaigns was identified as a means to mitigate such possibilities.

**Key Points in summary**

- Crucial to retain the role of the state in compiling and managing the electoral register in order to protect the overall integrity of the registration process. This basic requirement must be retained while providing individuals with control over their entry on the register.
- Concerns around the risk of loss of completeness if registering becomes reliant solely on the individual, especially among certain demographics, need to be considered.
- Awareness that some individuals may need assistance to register and the process needs to be designed to provide for that assistance.
- Awareness campaign needed to ensure people are aware of both the process of compiling the register and their role in it.

**Next Steps**

- Legislative analysis to consider how the balance between the state elements of registration and the individual responsibility elements will sit together to maximise the integrity of the process and the register and ensure compliance with data protection requirements.
- Identification of key demographics likely to be affected by the change (from other countries using similar systems) and mitigation measures that might address the risk – the schools programme proposed was one suggested way of engaging young people who would no longer be registered on a household form.
- Consultation with representative bodies that might have insights into the type of assistance needed to register for some groups or specific cohorts to ensure the process is fit for purpose for all electors and potential electors.
- Consideration will be given to this issue and we will explore the options for deletions from the register, including in cases where a person dies. This will be considered in tandem with any data sharing proposals, e.g. obtaining information from the General Register Office in respect of deaths registered.

Means of evaluating the accuracy, completeness and overall function of the register are also being developed as part of this modernisation process with the aim of enabling regular reporting on the status of the register and providing the evidence base for any necessary changes or engagements e.g. targeted awareness campaigns.

**Key Proposal 5 - Enabling a single national electoral register database with unique identifiers**

*From the Public Consultation paper:* At present, each local authority prepares its own electoral register. This proposal would involve compiling registrations from the 31 local authorities’ registers into a modern, secure central database. This would mean:
• Standard processes for all Local Authorities in how they manage and store data
• Each person on the register would get a unique register number, making it easier to find their individual record when they want to change their registration details. It would reduce the chance of errors during updates, for example, change of address.
• It would be easier for local authorities to avoid creating duplicate entries.

Forty-one respondents, or just under 23%, referred to this proposal specifically. 74% of these were fully in favour, rising to 86% in favour with some reservations and 14% not in favour.

Chart 11 Illustrates the percentage of respondents specifically in favour, in favour with reservations, or not in favour:

Arguments supporting a single register included the merit of standardising practices across the 31 current individual registers. Concerns about this proposal focussed very much on the importance of the security of any such database and effects of any breach, which is in keeping with views given by local authorities regarding security and possible data protection issues. Many respondents recognised the benefits of a single register in allowing for the identification of duplicates for example.

For those not in favour, or those with reservations, the security of any single centralised database, from accidental error or malicious attack was the key issue, with one person seeing a ‘huge risk’ in this approach. Local authorities previously mentioned the possibility of reluctance of persons engaging with a centralised database and the privacy and security concerns they may have.

It was also mentioned that local knowledge for verifying details should be retained and so each local authority should retain a role in its compilation in their own areas of remit.

Key Points in summary
• Security concerns regarding a national database are very evident
• Data protection and privacy will be critical
• Clarification of the role of individual local authorities in any move to a single register database.
Next Steps

- Consideration of the data protection and privacy implications of storing data in any electoral register database, along with the rules regarding access to that data and penalties for improper use as part of the development of the implementation proposal.
- The future governance of the electoral register is also an issue to be decided upon and the importance of local knowledge and the role of local authorities will be taken into account.
- The highest standards in terms of security (physical and technological), data protection and integrity will be employed.

Key Proposal 6 - A move to verified identity using Personal Public Service Numbers (PPSNs)

From the Public Consultation Paper: Currently the public can perform checks on the register by inspecting the draft register, and by An Garda Síochána checking forms and ID documents for entry to the supplement. This proposal would mean that when a person wants to be included on the register, or update their details they could give their PPSN. This would allow a basic check against an existing public sector database (e.g. the PPSN database) to make sure that the name, address, nationality, date of birth provided on the form match the information stored on the PPSN database and aren’t already on the register. PPSNs would not be part of the register or appear on the register.

Almost half respondents (48%) referred specifically to this proposal – the largest group. A large proportion of those were in favour of using some form of identity verification (over 72%, rising to 82% in favour with reservations).

A theme across the responses is the balance between having a method of identity verification to enable the most accurate register possible and issues regarding the specifics of identity verification, i.e. what method to use to maximise participation. A number of respondents referred to the potential risk that any new or additional requirements could deter some individuals from registering.

A small number of individuals objected to using the PPSN citing the risk of data breaches and privacy implications (one person commented that the right to vote should not depend on a voter’s willingness to use their PPSN). Most individuals however, by far agreed with the use of a verified identity element and referred to the PPSN in that context. Most individuals simply agreed with using the PPSN as a means to verify identity for registering. The main reason given by those in favour, when given, was the effect on the accuracy of the register,
with a small number citing convenience for registering or amending their details. Individuals tended to be more positive about using the PPSN as against representative bodies and parties.

Respondents differentiated between different forms of identity verification and concerns were expressed by some about the Public Services Card, particularly concerns that its use might be made mandatory to register. Some respondents, while positive regarding use of PPSNs themselves considered that there may be ‘some reluctance’ to giving PPSN details by others which may affect registration numbers.

The Irish Council for Civil Liberties saw any means of compelling individuals to use of MyGovID or the Public Services Card as ‘completely unacceptable’ and had concerns regarding the PPSN, as some categories of people entitled to vote may not possess a PPSN. It suggested that other means of verifying identity be examined in this respect. Nasc Ireland, an organisation that works with migrants and refugees, strongly advised against a mandatory use of a Public Services Card referring to the difficulties for some in getting one.

Whilst supporting the move to improve the accuracy of the Register, the Data Protection Commission (DPC) queried whether use of the PPSN was a ‘justifiable solution’ and reminded of the need for a Data Protection Impact assessment.

Key points in summary
- Individuals tended to accept, and in some cases welcome, the potential use of PPSN
- Respondents expressed concern about any proposal for a mandatory requirement for a Public Services Card/MyGovID to register online both individual respondents and Civil and Migrants Rights groups. Flexibility on requirements was mentioned by many to ensure that everyone eligible to vote has the best chance of registering.
- Guarantees regarding data protection and privacy should be inherent in any solution

Next Steps
- Preparation of a data protection impact assessment and ongoing engagement with the DPC.
- Evaluation of the data protection policies and practices.
- Consideration to be given to the best balance of ease of use/accessibility and proportionate use of data such as PPSN and what type of flexibility might work to balance integrity and security of the register, while maximising participation/counteracting any potential deterrent effect.

Key Proposal 7 - Data sharing to maintain accuracy and comprehensiveness

From the Public Consultation Paper: Information from an annual door-to-door or postal canvas can get out-of-date very quickly. Data sharing for the electoral register can mean two things:
- Sharing data between local authorities – this will improve how they communicate and will make sure that people moving between counties can trust that their information is correctly updated
- Data sharing between different organisations for the purposes of updating the register – for example, by allowing for the register to be checked against the PPSN database. Other types might include allowing people to change their address on the register at the same time as they change it for motor tax purposes, for example.

Information sharing would be minimal. The register only uses select pieces of information – confirmation of identity (possibly PPSN check); age; citizenship and address/Eircode.
16% of respondents referred to this proposal specifically. 36% of those were fully in favour, rising to 73% in favour with some reservations. Just over 26% were not in favour. This was the most mixed response perhaps indicative of the privacy and workability issues inherent in data sharing.

Chart 13 Illustrates the percentage of respondents specifically in favour, in favour with reservations, or not in favour:

![Chart 13 - Use of Data Sharing](image)

The same amount of respondents fully favoured this proposal as those favouring with reservations, possibly indicative of a general awareness and concerns relating to data privacy and security. A significant percentage were not in favour. This concern is evident in the difference between those fully in favour and those in favour with reservations – with many citing concerns regarding data privacy, protection and security. One individual urged for ‘clear standards, limits and safeguards’.

Many supporting this proposal only supported a limited exchange of data – only data that was fully necessary. The issue of ‘mission creep’ was mentioned here also and some referred to having controls on the data to be shared – there was one suggestion for a possible Opt-In provision for voters. Others referred to the fact that other Government Departments already share data to confirm information and improve service and a local authority raised the issue of ‘non-reciprocal’ and very limited data exchange.

Local authorities do currently maintain some data sharing among each other to ensure minimal duplication and register accuracy, for instance when voters apply to change address in different authority areas. The Data Protection Commission stipulated that any data sharing should be within the remit of the Data Sharing and Governance Act 2019.

**Key points in summary**

- Acknowledgement of the difference between data sharing among local authorities only and data sharing between local authorities and other Government agencies.
- Data privacy and security referred to by many.
- Concerns regarding ‘mission creep’ – importance of data minimisation.
- Concerns about the validity, currency of data being shared
Next Steps

- Consideration to be given to the best means of ensuring integrity of any data being included in the register and the protection of data on the register.
- Consideration of provisions and agreements needed, in line with the Data Sharing and Governance Act 2019, to enable the minimum data required to be shared between Local Authorities in the first instance to ensure the proper functioning of the register.
- Consideration to be given to a procedure/process to explicitly identify the steps (legislative or otherwise) to be taken to make any changes to the data sharing around the register, whilst maximising transparency and clarity about what data is shared, with whom and why.
5. Additional proposals:

Allowing provisional registration for 16-17 year olds - automatically activating on someone’s 18th birthday

From the Public Consultation Paper: Allowing provisional registration for young people aged 16-17 who could get on the register, through a schools programme for example, with their registration automatically becoming active on their 18th birthday.

20% of respondents referred to this proposal specifically with 91% of these generally in favour of this proposal.

Chart 14 Illustrates percentage of respondents specifically in favour, in favour with reservations, or not in favour:

The majority of respondents were in favour of this additional proposal. It should be noted that a number of those in favour of this proposal stipulated automatic registration for persons turning 18 years of age, rather than specifically pre-registering 16 and 17 year olds.

The benefits outlined included ensuring all persons turning 18 are enabled to vote, encouraging engagement among young people with the electoral process and their role as voters, and improving the accuracy of the electoral register. The National Youth Council of Ireland commented that this provision would overcome the issue of many young people not registering due to being away from home during this period of their lives. The Union of Students in Ireland saw this proposal as aiding in increasing participation among young voters. Local authorities saw the benefits of this proposal mentioning that where schools programmes were run they were considered very effective in engaging younger people.

Having safeguards regarding privacy and security were mentioned, and the use of any personal data for those under 18 would need to be considered very carefully. The Data Protection Commission outlined the importance of the consideration of the Data Protection Act for any potential processing of data of persons under 18.

The need for specific initiatives and awareness drives for younger people, appeared across many submissions.

Key points in summary
- Almost total support for this proposal, which is seen as one that would encourage engagement among younger people with the electoral process.
- Awareness campaigns on registering and the electoral process is important.
- Processing of details of persons under 18 have additional requirements under the Data Protection Act.
Next Steps

- Consider the data protection issues involved in processing data for under-18s and identify steps needed to implement.
- Implementation proposal to be developed in consultation with Local Authorities and representative groups.

Specific registration provision for people with no fixed address (e.g. people experiencing homelessness)

From the Public Consultation paper: Specific provision for people with no fixed address e.g. people experiencing homelessness to ensure a standard procedure across the country.

13% of respondents referred to this proposal specifically with 100% of those in favour of the proposal.

Chart 15 Illustrates the percentage of respondents specifically in favour, in favour with reservations, or not in favour:

Of the relatively small amount of specific responses to this proposal, there was a unanimity of favourable responses with one individual seeing it as a ‘progressive move’.

Current legislation refers to a voter’s place of ordinary residence for registration purposes and local authorities are encouraged to facilitate as much as possible persons experiencing homelessness by allowing them to register at their temporary place of residence or at the relevant local authority address.

Focus Ireland referred to those experiencing different levels of homelessness and housing insecurity and the removal of administrative barriers allowing such persons to vote. This issue of the registration address of those with no permanent address was mentioned by a number of individuals in respect of how would a constituency and polling place be ascertained. Both Cope Galway and the Peter McVerry Trust suggested that people should be able to use their last home address to register in these circumstances. An Post highlighted that they currently provide a service to enable access to services—‘Address Point’ - for those experiencing homelessness. The importance of providing information and awareness of voting rights for those in homeless situations was also referred to.

Key points in summary

- Full support for this proposal from respondents.
- Broad criteria suggested to maximise facilitation of those experiencing different levels of homelessness.
- Importance of considering how temporary accommodation might change a person’s constituency or polling place temporarily.
Next Steps

- Implementation proposal to be developed in consultation with Local Authorities and representative groups. To include consideration of address to be used, which may affect the polling place and thus constituency.

Provision for anonymous registration for people whose safety may be at risk

From the Public Consultation paper: Provision for anonymous registration for people whose safety may be at risk if their details are public on the register, for example where barring orders or other court ordered protections are in place.

Fifteen or just under 10%, of all respondents referred to this proposal specifically with most of those in favour or in favour, with some caveats.

Chart 16 illustrates the percentage of respondents specifically in favour, in favour with reservations, or not in favour.

A general agreement with this proposal is evident, with caution expressed regarding details of implementation and potential effects on integrity of the register.

The merits of this proposal were acknowledged and supported in general by those who responded. One respondent described this proposal of being of vital importance for exercising the right to vote without having to put safety at risk with a recommendation to follow best international practice in this regard. The workability of how a person would qualify (i.e. what ‘evidence’ - such as an attestation - may be required) was mentioned with Safeireland recommending a similar process to that in the UK. Cope Galway suggesting use of a number for registration of such persons to ensure anonymity.

However, some concerns were raised – largely in relation to the specifics of implementation. The workability of the proposal was questioned in relation to ensuring confidence in the integrity of the register regarding the ability to inspect the register. Dublin City Council had concerns about the potential risk of fraud. One person said that limited circumstances should apply but on the other hand some did not want the ‘bar set too high’ for availing of this facility.

Key points in summary

- Consideration needed of best practice where this facility is available.
Further consideration of how ‘certification’ should be handled to ensure the facility works for those who need it while protecting the integrity of the registration process.

Next Steps

- Implementation proposal to be developed in consultation with Local Authorities and relevant organisations, taking account of international best practice.

Removal of provision for the edited register

**From the Public Consultation paper:** Removal of provision for the edited register which is used infrequently in any case but may no longer be an appropriate use of data connected with the electoral register.

12% of respondents referred to this proposal specifically. Some 95% of these were in favour, with less than 5% of these not in favour.

![Chart 17 - Removal of the Edited Register](image)

**Chart 17 Illustrating percentage of respondents specifically in favour, in favour with reservations, or not in favour:**

Of those who responded, a large percentage were in favour of its removal. This corresponded with Local Authorities’ own views, where the vast majority saw its removal as desirable.

Many who were in favour of this proposal used words such as ‘strongly agree’ or ‘emphatically support’, citing that the electoral register should not be used for purposes other than electoral. The NYCI, for example, agreed with this proposal, specifying that the electoral register should not be used for any marketing or sales purposes.

Since 2018, electors must opt-in by proactive choice to be listed on the edited register. There has been a trend of decrease in the number of electors appearing on the edited register over the last number of years. 9.9% of registered voters appear on the current 2019/2020 Edited Register of Electors. Dublin City Council suggested that many of those on the edited register remain from before the change to Opt-In. Statistics for 2018 show that there were only 27 requests across all registration authorities for the edited register.

Some submissions confused the edited register with the ‘marked register’ (i.e. the physical register showing voters who received a ballot paper at an electoral event) and local authorities have previously highlighted this general lack of awareness of the edited register or what it is for. One respondent was explicitly against the removal of the edited register though this appears to have
been on the mistaken assumption that the full register would then be closed for inspection – this is not the case.

Some respondents were concerned that removal of the edited register could result in the possibility of the full register being used in some instances for purposes other than electoral.

**Key points in summary**
- Overwhelming support for removing provision for the edited register, thus not allowing any use for marketing or any similar purpose.

**Next Steps**
- Legislative analysis to identify necessary changes to remove provision for the edited register.
- Consideration of any other steps needed for implementation e.g. highlighting what the register can be used for (electoral and other statutory purposes) and considering how to draw attention to the penalties for improper use.

**6. Conclusions and next steps**

The public consultation process delivered a significant amount of information for the further development of the policy proposals and account will be taken of all suggestions made and concerns raised.

Work is now underway to further advance the modernisation project:
- Drafting of a General Scheme of a Bill to implement the legislative changes necessary to be completed by end-2019: this will set out legislative proposals that will be sent to Government seeking approval for drafting of a Bill.
- The Department is working with Dublin City Council to have an independent evaluation of voter.ie completed with a view to a national roll-out of an optional online registration service.
- Work is underway to develop the streamlined application forms – this will include consultation with all relevant stakeholders.

Updates on the project will be available at [www.registerreform.gov.ie](http://www.registerreform.gov.ie), (which redirects to the Department’s website [www.housing.gov.ie](http://www.housing.gov.ie)). Implementation of any changes to the electoral registration process will be accompanied by public information campaigns.
7. Appendices

Appendix 1 - Voter.ie – Pilot Project by the Dublin Local Authorities

In 2011, the Directors of Service from the four Dublin Local Authorities with responsibility for the Register of Electors met to discuss a range of services and their suitability for operating as a Dublin region shared service. The project identified a series of legislative changes that would streamline and simplify procedures for administration.

These included:

- The introduction of a rolling register which would remove a significant amount of work involved in producing and publishing the draft, the register and the supplement; the claims process; and also simplify the forms for registration.
- Provision for some unique identifier data to be collected e.g. PPSN.
- Provision for individual registrations only rather than household on the basis that the latter contributes to duplicate entries on the register.

Since there was no proposal for legislative change at that time, a project team was established to develop a new IT system working within the confines of existing legislation. There was national agreement on the approach and a Local Government Management Agency (LGMA) project board was set up to oversee the development. The Board decided that Dun Laoghaire-Rathdown (DLR) County Council should proceed on behalf of the sector and once the system was live in DLR and Dublin City Council that the National Project Board would be reactivated to discuss a national roll out of the IT system. The business objectives identified for the project were the reduction of costs; improving data quality and access; improving the user experience and aligning with the public sector reform agenda. In 2012, following extensive consultation, the system specification was finalised and a contract for development was awarded in 2013.

Voter.ie offers significant improvements to the existing process by:

- Making it easier to identify potential duplicates
- Automating contacts between the Authorities where needed
- Standardising the structure of data held
- Automating processing of physical forms
- Allowing for batch importing of data such as death lists from the GRO (General Register Office) rather than a manual checking
- Enabling batch exports to statutory users of the electoral register like the courts service and An Post that previously required significant data cleaning

The Voter.ie system essentially operationalises a number of the proposals put forward in relation to the modernisation of the register. It provides a single centralised register (backend) and online registration and self-service (front-end). Voter.ie uses MyGovID (linked to the Public Services Card) for identity verification.

To enable the Voter.ie platform for online applications to be piloted, a Statutory Instrument\(^5\) was made. This removed the need to attend either a local Garda station or the office of the registration authority where the registration authority has put in place an electronic means by which the identity of an individual can be verified using name, PPSN, date of birth and address. This provided electors living in the Dublin area with the option to register and/or update their electoral details for the Supplement to the Register online.

The online Voter.ie portal went live in the four Dublin local authorities on 4 April 2019 in the run-up to the referendum and local and European Parliament elections held on 24 May 2019. Voters could log in

\(^5\) S.I. 153 of 2019
to the system by means of MyGovID (which is available to all those with a Public Services Card) and apply to register or amend their details online. The current nationwide facility www.checktheregister.ie, which is a look-up facility only, re-directed voters living in the 4 Dublin authorities to Voter.ie, providing the additional application functions for those voters. This facility was an optional facility and voters still availed of the current system of applying via the paper application Forms.

Dublin City Council have reported, in an initial evaluation, that they consider the Voter.ie system to have performed very well. Most voters were still using the current application process, however, for a pilot project, Dublin City Council were encouraged with the use of the online system – 16% overall application were performed online across the four Dublin LAs with 66% of those being for new applications (i.e. first time registrations).

**Usage Statistics on Voter.ie (from go live date of 4 April to pre-election day cut-off of 7 May)**

- 1.2 million ‘hits’ in total
- 520,000 ‘accesses’ where users accessed different areas of the Voter.ie site.
- Total Applications for the supplement - 12,654
- Online Applications via Voter.ie - 2,058
- Further Breakdown by each of the 4 Dublin local authorities

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Total Applications</th>
<th>Overall Applications</th>
<th>Online as a % of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dublin City Council</td>
<td>5736</td>
<td>1024</td>
<td>17.8 %</td>
</tr>
<tr>
<td>Dun Laoghaire-Rathdown Co. Co.</td>
<td>2388</td>
<td>365</td>
<td>15.2 %</td>
</tr>
<tr>
<td>Fingal County Council</td>
<td>2534</td>
<td>349</td>
<td>13.7 %</td>
</tr>
<tr>
<td>South Dublin Co. Co.</td>
<td>1996</td>
<td>320</td>
<td>16 %</td>
</tr>
<tr>
<td><strong>Total – 4 Dublin LAs</strong></td>
<td><strong>12654</strong></td>
<td><strong>2058</strong></td>
<td><strong>16.2 %</strong></td>
</tr>
</tbody>
</table>

Some issues identified in the initial evaluation include:

- The system requires that name, address, date of birth and PPSN are available for the individual elector record and match what is held by the Department of Employment Affairs and Social Protection.
- Further consideration of providing extra targeted information for voters, including in the FAQs section of the website, regarding categories of voters. (e.g. nationality and voting rights and requirements)
- A continued requirement for back-office support in the lead registration authority (Dublin City Council) and the other authorities involved regarding data-exchange, where a voter is re-registering in a new local authority area, to ensure they are only registered once.

As part of the implementation proposals for this wider modernisation programme, a robust and independent evaluation of Voter.ie will consider the security and data protection elements of the platform to confirm whether they are

- Technically secure and robust
- GDPR compliant – Privacy/Data protection by design and default
- Fully capable of meeting user needs
- Sufficiently adaptable to take account of future changes
Appendix 2 - Summary Document of Proposals.

Public Consultation – The Summary

Seven proposals to change how we register to vote

1. A streamlined simplified process
2. Rolling (or continuous) registration
3. Optional online registration
4. Individual registration only
5. A single register database
6. Improvements to identity verification
7. Data sharing options for the future

They could mean:

- Registration in a way that works for everyone – online or on paper
- A clear and simple process – one form, one process, one register – all year round
- A single, secure database to enable cross-local authority checks while protecting data
- Balancing security and ease of access to protect the integrity of our registration process
- Building an electoral register that is secure, comprehensive and accurate
- Data sharing in the future – subject to clear standards, limits and safeguards

To enable these reforms would require:

- Improved identity verification – this could mean providing additional data such as Personal Public Service Number (PPSN)
- For optional online registration and self-service, MyGovID/Public Services Card (PSC) would facilitate this
- Enabling the sharing of some limited and specified information between local authorities (who manage the registers) and between the register and other public sector bodies strictly for verification purposes.

To ensure the safety and security of your data and the integrity of our electoral system:

- Data protection and privacy will be central at all stages; data collection and storage will be subject to rigorous testing
- Hardware and cyber security will be prioritised
- Strict usage rules will apply for those working with the register
- Rigorous and sustained security and stability auditing will occur over the long-term
Minister Phelan launches public consultation on modernisation of electoral register process

- Proposal to introduce simplified registration procedures including optional online access
- Improved identity verification to improve security, accuracy and integrity
- Proposed reforms would represent the most significant modernisation of the electoral registration process since 1918
- Public consultation process runs until 15 March 2019

The Minister of State for Local Government and Electoral Reform, John Paul Phelan, T.D., today (17 December, 2018) launched a public consultation on a series of proposals to modernise the electoral registration process. The proposals include the introduction of a simplified registration process; a reduction in the number of application forms; online registration as an optional alternative to paper-based registration; and the move from household-based to individual registration. Verification of identity through the possible use of Personal Public Service Numbers (PPSNs) is also proposed. The proposals arise from a commitment in the Programme for a Partnership Government to examine the voter registration process.

Launching the public consultation, Minister Phelan said: “The current system has served us well and will continue to do so. However, the proposals on which we are asking people’s views today are aimed at enabling people to register in simpler yet secure ways. These changes, if implemented, would be the most significant reform of the electoral registration process since 1918. As well as removing an excessive number of steps involved in applying to be included on the electoral register, the proposals would further increase the register’s ability to keep up to date with changing individual circumstances and, therefore its integrity.

“Reducing the number of different registration forms; allowing people to register online; and introducing a process of continuous or rolling registration would make the registration process much more user-friendly and similar to the way people interact with other State services. These changes reflect changes in how we live today. Having a registration process that recognises and facilitates more frequent changes of address is crucial in maintaining an accurate register.”

The proposals on which the Minister is asking the public for their views include:

1. **A more streamlined, simplified electoral registration process**, with a single, simplified form.
2. **Rolling, or continuous registration** – rather than the current draft, live and supplement versions of the register – this will provide for a single, live register at all times.

3. **The introduction of online registration** as an *optional* alternative to paper-based registration - currently people must complete paper application forms and send them to their local authority.

4. **Individual registration only** - currently the use of household forms could potentially result in people being included on the register or their registration details being amended without their explicit consent.

5. **The establishment of a single, national electoral register database** to be used by all local authorities to standardise data formats and processes; help prevent and remove duplicate entries and ensure standardised data protection and management procedures.

6. **Improvements to the system of identity verification**, including through the possible use of PPSNs, to streamline the system by minimising the need to present documentation to a local Garda station and minimise the potential for duplicate entries or erroneous amendments.

7. **The possibility of data sharing between public bodies and electoral registration authorities to maintain details.** Data sharing could involve the automatic updating of someone’s address details for electoral registration purposes when they change address with another public body.

On the public consultation process, Minister Phelan said: “Many of these proposals have been made previously, most recently in 2016 by an Oireachtas Joint Committee. Now the Government is keen to get the views of the public. My department will engage with groups with a particular interest in this area as part of the public consultation process and I would urge everyone to participate in our consultation by the 15th of March 2019.

“Public confidence in any reform of the electoral registration process is paramount as the system affects all of us. The outcome of this consultation process will inform the development of detailed proposals for implementation. That is why I encourage everyone to consider these proposals and have their say.”

Another related development of note is the Voter.ie project currently being undertaken by the Dublin local authorities, led by Dublin City Council and supported by the Department of Housing, Planning and Local Government, in which they have developed proposals for an enhanced system of voter registration. The aim of this project is to introduce an IT system to improve the efficiency and accuracy of the Register of Electors and allow users to maintain and update their details online at their own convenience.

ENDS

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Four days left to give views on proposals for electoral registration reform. Minister Phelan asks public to give their views by Friday

The Minister of State for Local Government and Electoral Reform, John Paul Phelan, T.D., has invited the public to give their views on the Government’s proposals for reform of the electoral registration process before the public consultation ends this Friday (15 March).

Speaking today, Minister Phelan said: “Most of us will use the electoral registration process during our lives. It’s a very important part of the democratic process. The Government’s proposals, if implemented, would be the most significant reform of the process since 1918. I ask all with an interest in the proposals or who want to see electoral registration made simpler and user-friendly to give us their views by Friday.”

Minister Phelan concluded: “Public confidence in the electoral registration process is essential. The Government wants to hear the views of the public or organisations, be they support for or concerns with particular proposals. By giving their views now, people can help refine these proposals and make the process one that caters for modern living and the needs of all — one that continues to enjoy public confidence.”

The proposals for reform of the electoral registration process are:

1. **A more streamlined, simplified electoral registration process**, with a single, simplified form.
2. **Rolling, or continuous registration** – rather than the current draft, live and supplement versions of the register – this will provide for a single, live register at all times.
3. **The introduction of online registration** as an optional alternative to paper-based registration - currently people must complete paper application forms and send them to their local authority.
4. **Individual registration only** - currently the use of household forms could potentially result in people being included on the register or their registration details being amended without their explicit consent.
5. **The establishment of a single, national electoral register database** to be used by all local authorities to standardise data formats and processes; help prevent and remove duplicate entries and ensure standardised data protection and management procedures.
6. **Improvements to the system of identity verification**, including through the possible use of PPSNs, to streamline the system by minimising the need to present documentation to a local Garda station and minimise the potential for duplicate entries or erroneous amendments.
7. **The possibility of data sharing between public bodies and electoral registration authorities to maintain details.** Data sharing could involve the automatic updating of someone’s address details for electoral registration purposes when they change address with another public body.

The Minister is also proposing:

1. **Allowing provisional registration for young people aged 16-17**, e.g. through a schools programme, with registration automatically becoming active on their 18th birthday.
2. **Specific provision for people with no fixed address** e.g. people experiencing homelessness, to ensure a standard procedure across the country.
3. **Provision for anonymous registration for people whose safety may be at risk if their details are public on the register**, e.g. where court ordered protections exist.
4. **Removal of provision for the edited register**, which is used infrequently in any case but may no longer be an appropriate use of data connected with the electoral register.

Responses to the proposals will be accepted on or before **15 March 2019**.
Appendix 4 - The Public Consultation Process – Awareness campaign

Mr. John Paul Phelan T.D., Minister of State for Local Government and Electoral Reform launched a public consultation process on 17 December 2018. The consultation launch outlined the key proposals and informed of communications details, inviting submissions from all interested parties, with a deadline of Friday 15 March 2019 for receipt. Consultation Documents (a Summary, a short-form document and a more detailed long-form document) were made available (see Appendix 2 for a copy of the Summary of the Consultation Proposals).

A further Press Release was issued by Minister Phelan as the deadline approached, on 11 March 2019, (See Appendix 3 – Press Releases) again urging engagement with the consultation and asking for views on the proposals to modernise the electoral process.

The consultation process was supported by a media campaign to maximise awareness of the process and to encourage engagement from all stakeholders in particular members of the public as electors and potential electors. A total of seven articles appeared in various national newspapers on 17 December detailing the consultation process and the key proposals.

Advertisements

In conjunction with Minister Phelan’s Press Release, issued by the Department on 17 December 2018, Public notice advertisements inviting submissions were published in seven national newspapers and some forty regional newspapers. A notice inviting submissions in Irish was also placed in the Irish language newspaper Seachtain.

While not specifically part of the awareness campaign, mention of the proposals to modernise the register was also contained in a national Newspaper supplement (Irish Times) Vote 100 – A century since Irish Women Won the Vote, of which 80,000 copies were printed and delivered to all primary and secondary schools within the country.

Register Reform Website

A website – www.RegisterReform.gov.ie - was set-up which brought visitors to the Department's website outlining the background to the modernisation process, including a summary, short and more detailed versions of the proposal and consultation documents and links to the Report of the earlier consultation with local registration authorities for downloading. Contact details were provided for those wishing to make submissions by email or by post. Local Authorities also provided information updates regarding the consultation on their own websites.

Over 13,000 website pageviews were incurred in the 12-week consultation period, with over 900 downloads in total of the four Consultation Documents, with a clear peak towards the end of the campaign.

Chart 18 illustrates, by each week of the consultation period, the number of downloads by type of document (one-page summary, a short and a longer version of the consultation documents were available for download, as well as the Press Release (PR)).
Consultation Invitation Letters

During February and March 2019, letters issued to all local registration authorities’ Franchise sections, Chief Executives, for the attention of all Members, as well as local government representative groups, reminding of the deadline and advising of communications details for making submissions.

A Radio and Social Media campaign informing of the proposals, encouraging engagement and inviting submissions was also undertaken.

132 twenty-second radio adverts encouraging engagement with the consultation appeared on popular national and regional radio stations from 18 February to the 10 March (weeks 10, 11 and 12 of the campaign).

There were over approximately 1.1 million displays (impressions) of digital ads about the public consultation through digital advertising. These directly led to approximately 1,700 web clicks to the consultation page (click-throughs). In addition, social media advertising contributed to approximately 545,000 impressions of social media posts on Facebook and Twitter inviting people to make submissions on the proposals. These resulted in approximately 2,321 click-throughs to the consultation webpage.

Social Media and Online Advertising Samples:

Modernising Voter Registration | We Want Your Views | Get Involved By March 15th
Ad www.example.com/Register/Reform
Give Your Views On The Proposed Changes To Improve The Registration Process.

Up to the start of the Radio and online awareness campaign, 40 submissions, or 21% of the total were received with the balance 79% (147) received from the start of this awareness campaign up to the
deadline. 45% of submissions (84) were received in the final week following the reminder Press Release of 11 March.

Posters for Public Display
During December 2018, Information Posters informing of the consultation and inviting engagement were issued to all Citizens Information Centres (CICs) nationwide, as well as local authorities own offices and Libraries, Student and Youth representative organisations and Community and Voluntary organisations for display in their public areas. During March 2019, in the lead-up to the deadline for receipt of submissions, emails were circulated to Local Authorities, CICs and Student and Youth organisations again requesting that posters, copies of which were attached, be placed in public areas reminding of the deadline.

Meetings and Briefing Sessions

A presentation on the modernisation proposals was made at the 23 January 2019 Joint Oireachtas Committee on Housing, Planning and Local Government and a similar presentation was given at the AILG (Association of Irish Local Government) annual conference during February.
A Briefing and Q&A meeting was held with Community and Voluntary Sector stakeholder groups in the Custom House on 20 February, hosted by Minister Phelan. Youth, senior citizens, students, persons experiencing homelessness, literacy and disability representative groups attended.

Minister Phelan outlined the importance of the registration process itself as well as its importance in a democracy. He contextualised the background for reform of electoral registration, outlined the key aims of the process, the issues informing it and the key proposals for reform.

Attendees outlined their views of the current electoral registration system and what areas should be addressed, as well as commenting on some of the specific proposals listed in the consultation documents.

The Minister gave the details of the public consultation process, including the radio and social media campaign that was underway and encouraged all attendees to engage and submit any views.

**Total costs**

In total the awareness campaign cost €114,682. This figure includes newspaper advertising, content creation, radio time and internet and social media.

The 187 submissions received, the high proportion of submissions from individuals and the timing of those submissions would suggest that the awareness campaign was effective. Along with encouraging the submission of views, however, the campaign sought to start a conversation more generally about the need for reform and to build awareness with people across the country that this important project is underway. Further work will be undertaken to ensure the cost effectiveness of the necessary and ongoing awareness raising related to this project to ensure that the public is aware of changes that are being proposed and the process underway.