

Draft Submission on Electoral Registration Process

Sinn Féin supports the proposal to overhaul the electoral registration system and wishes to see the process result in a more accurate, accessible and inclusive electoral system. We support the register and the associated processes being done at a state-wide level and that this should happen alongside the establishment of an Election Commission which should have responsibility for the register as opposed to the local authorities as at present.

Sinn Féin is eager to ensure that the changes made as part of this process are not seen merely as an administrative tidying up exercise, rather that it be seen as an opportunity to deliver a modern electoral register system that is built to maximise participation by ensuring as close to 100% registration of eligible voters as is possible, and the highest turnout possible from that register.

The register must therefore not simply be seen as a list of those people eligible to vote, but as a vital tool in the exercise of democracy, of helping to identify and address issues within society that act as barriers to participation by individuals and groups within society.

Key Proposal 1: Simplification of forms and process

Sinn Féin supports the simplification of the process and the introduction of a single form for registration. We believe this is a common-sense proposal and that the mitigations to the risks identified in the consultation document should be implemented.

Key Proposal 2: A rolling register or continuous registration

Sinn Féin supports a rolling register as suggested in the document. We believe the current system is unnecessarily restrictive and difficult for people to access and makes registration drives by parties and community groups far more difficult than it should be.

We note that the proposal allows for registration only up to 14 days prior to polling day. We believe that this timeframe should be dramatically shortened and consideration should be given to systems in place in other jurisdictions that allow for on-the-day registration of electors.

Often electors do not become fully engaged in campaigns until very close to polling day and allowing people register up to a few days beforehand, and on-the-day if necessary, will help maximise democratic participation.

Key Proposal 3: Optional online registration and secure self service

Sinn Féin supports the proposal to allow online registration and updating of information. Again, this is a common-sense recommendation. We do have concerns that it is suggested that this could be limited to those who have Public Services Cards and may act as a deterrent to some. We believe other forms of state issued identification should be allowable in using online registration.

There is also the practical future proofing of the system to be considered. There is already provision within the electoral system for those outside the jurisdiction for voting in the Seanad elections and active consideration is being given to holding a referendum on voting rights for Irish citizens outside the jurisdiction in Presidential elections. Allowing other documents, such as passports, would allow for this register to be more easily compiled and maintained.

Key Proposal 4: Moving to individual registration only

Sinn Féin supports this recommendation and the mitigation suggested in the risks. We do wish to raise the practical issues of those who may require assistance in filling in their own forms, such as those with intellectual disabilities or literacy issues, and would seek to ensure that adequate provisions are made to ensure those electors do not experience any difficulties in registering.

Key Proposal 5: Enabling a single national register database with unique identifiers

Sinn Féin very much supports this recommendation. We do note that the proposal as described does suggest that Local Authorities would continue to administer the register for their respective areas, and assume that this is symptomatic of there being a separate consultation on the establishment of an Electoral Commission which would ultimately supersede the Local Authorities as the responsible body for the register. We would view this as vital for the success of a single register.

Alongside this proposal, Sinn Féin would very much like to see uniformity applied to address line information to ensure basic inaccuracies quite common within the system be addressed. For example “St. Patrick’s Street” could alternately be entered onto the database in 27 different ways through commonly used differences in syntax (St, St., Saint – Patricks, Patrick’s, Patrick – St, St., Street).

We also wish to ensure that Eircodes are used alongside the register. This will ensure that voters can be accurately identified on the register and will also allow comparison with the Eircode database to identify households not currently on the register.

Key Proposal 6: Moving to verified identity using PPSNs

Sinn Féin supports this proposal and the mitigation to the risks identified. While some people may express concerns regarding sharing their PPSN, there is a need to secure the integrity of the register and this is a reasonable response while also minimising potential restrictions. We would see this as a separate and distinct matter to the issue of the Public Services Card.

There would be a need to have considerable public information campaigns on this issue to ensure that misinformation does not allow this provision to become a barrier to some in registering. There would have to be very strong assurances, based in legislation, that details from the register could not be used for any other purpose by state agencies other than for purely electoral purposes.

Key Proposal 7: Data sharing to maintain accuracy and comprehensiveness

Sinn Féin accepts that a basic level of data sharing would be required, however very strict controls must be in place, and known to be in place, on what this would mean in practice. Some of the language used in the description of this proposal could be misconstrued and could cause difficulties.

Should there be any proposal to share data with or from the election register, this must only be done with the explicit and informed consent of the individual in an ‘opt-in’ format. There should be no penalty or inconvenience of any sort to those who do not wish to opt-in. Some of the mitigation measures identified would go some way towards this, however there is loose language elsewhere in the section which could cause difficulties for some.

Other Proposals being considered

Provisional Registration of 16-17 year olds: Sinn Féin would very much welcome this proposal. We believe it would also be prudent as there are suggestions of possible reduction of the voting age to 16 at some point in the future.

Provision for people with no fixed abode: Sinn Féin would welcome such a proposal and would engage positively with practical proposals in this regard.

Provision for anonymous registration in certain circumstances: Sinn Féin would welcome this as a practical public safety measure, and would positively engage with practical proposals in this regard.

Removal of provision for the edited register: Sinn Féin accepts the logic of such a proposal provided the Data Protection Commissioner is satisfied that it would no longer be permissible to use such data for non-electoral purposes and that access to the register was suitably controlled to those using the register for electoral purposes.

Other issues proposed by Sinn Féin for consideration

Automatic registration upon receipt of PPSN: Sinn Féin believe that this would be a considerable positive addition to the above proposals. This would ensure that those turning 16 and that people moving from outside the jurisdiction would be automatically enrolled upon receipt of their PPSN.

Combining of the Dáil and University Seanad registers: This would improve accuracy and allow for a more secure and up to date Seanad electoral roll.

Availability of marked registers for all contests in electronic form: Currently marked registers are not published for referendums and Presidential elections. This reduces the transparency of the process and prevents adequate research by parties and academics into turnout trends. Marked registers for all contests should be made available to relevant parties.

Also marked registers in other jurisdictions are often provided in an electronic, usable form, generally spreadsheet. Availability of such information to parties and candidates can help in a practical way to improve turnout by allowing specific engagements with non-voters by canvass. Options regarding how this may be made available in this state should be explored, including the electronic marking of the register in polling stations, or through the use of Optical Character Recognition (OCR) software.

Publication of turnout figures: Currently only the Dublin City Returning Officer publishes official turnout figures per box in all contests. This should become the norm for all areas in all contests.

Additionally, turnout figures at set times should be published throughout the day within polling stations, and should be made available online after the close of polls. The ability to make like-for-like comparisons with turnout in a polling station at a set time from election to election would allow parties and candidates to adequately deploy resources to turn out voters in areas which are slower than might be expected, and to better understand turnout dynamics.

Availability of voter data: The voter file should be available as of right to registered political parties. Adequate arrangements should be put in place to allow parties request and speedily receive the voter file at any time in suitable formats.

Regular lists of voters added or removed to/from the state-wide register, or other changes to name or address, should also be provided to parties and candidates.

Provide proper access to postal, proxy and early voting: The current system is extremely restrictive to anything other than on-the-day and in-person voting. It is now the norm internationally to provide other methods for voters to cast their ballots in order to maximise participation. This review should allow for widening the availability of postal and proxy voting so that they would be available to any voter upon request, and the introduction of early voting.

Examination should be done into the feasibility of allowing voters to cast their ballot in polling places other than their local station. The introduction of a single state-wide register makes this a realistic possibility through electronic access to the register by presiding officers.

Robust procedures for removal from register: Every polling day, Sinn Féin receive reports from electors who have voted for many years at the same address, that they have arrived at the polling station to find that they are no longer registered. They have received no notice of their removal and are disenfranchised.

Clearly some of the procedures currently in place are not robust enough in their implementation. A voter should only be removed from the register with their explicit consent. Lists of voters removed from the register should be provided on a regular basis to parties and candidates.

Polling scheme and siting of Polling Places: The construction of the polling scheme can be arbitrary change considerably from election to election. There should be more consistency in how the scheme is constructed, with minimal changes made. It is not unusual for members of the same household to find themselves voting in separate boxes at the polling station. More consistency will enhance the ability to make like-for-like comparisons between electoral contests for parties and academics, allowing for initiatives to be taken to enhance turnout.

The siting of polling places can sometimes make it more difficult for certain groups to attend their local polling place. This should be kept under examination to ensure that the siting of the polling places does not act as a barrier to participation.

All polling places must also be fully accessible to people with disabilities or reduced mobility, ensuring suitable wheelchair access and other such facilities as required.

Coherency with Census data: As well as the current system of inclusion of DED alongside voters, alignment with the latest Small Area Population Statistic areas (SAPS) from the Central Statistics Office Census data. This will allow the identification of blackspots of under registration very precisely and the targeting of registration resources accordingly.