

Delivering and costing a proof of  
identity scheme for polling station  
voters in Great Britain

December 2015

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We are an independent body set up by the UK Parliament. We regulate party and election finance and set standards for well-run elections. We work to support a healthy democracy, where elections and referendums are based on our principles of trust, participation, and no undue influence.

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# 1 Why we have developed a proof of identity scheme for polling station voters in Great Britain

1.1 The Electoral Commission is an independent body which reports directly to the UK Parliament. We regulate political party and election finance and set standards for well-run elections. We put voters first by working to support a healthy democracy, where elections and referendums are based on our principles of trust, participation, and no undue influence.

- **Trust:** people should be able to trust the way our elections and our political finance system work
- **Participation:** it should be straightforward for people to participate in our elections and our political finance system, whether voting or campaigning; and people should be confident that their vote counts
- **No undue influence:** there should be no undue influence in the way our elections and our political finance system work

## Electoral fraud vulnerabilities at polling stations

1.2 Our review of electoral fraud in the UK, which reported in January 2014, concluded that polling station voting in Great Britain remains vulnerable to personation fraud.<sup>1</sup> There are currently few checks available at polling stations to prevent someone claiming to be an elector and voting in their name.

1.3 We are concerned that polling station voting could become more vulnerable to fraud as other processes, including absent voting and electoral registration, have become more secure following recent legislative changes. Those intent on committing fraud may now shift their focus to remaining weaknesses within the system.

1.4 We therefore recommended that there should be a requirement for electors across Great Britain to present an acceptable form of identification prior to being issued with a ballot paper and voting at the polling station. Similar requirements are already in place in Northern Ireland and several other comparable democracies. This measure would almost entirely remove the opportunity for personation at polling stations. We recommended that a proof of identity scheme should be in place to be

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<sup>1</sup> See [http://www.electoralcommission.org.uk/\\_data/assets/pdf\\_file/0008/164609/Electoral-fraud-review-final-report.pdf](http://www.electoralcommission.org.uk/_data/assets/pdf_file/0008/164609/Electoral-fraud-review-final-report.pdf)

used by no later than for the 2019 European Parliamentary and English local government elections.

1.5 We said that we would undertake further consultation and analysis to identify a proportionate and accessible scheme for verifying identity at polling stations in Great Britain, using as our starting point the Northern Ireland model. Voters in Northern Ireland have been required to present photographic identification (photo ID) before they can be issued with their ballot paper at polling stations for elections since 2003.<sup>2</sup> Electors in Northern Ireland who do not possess an acceptable form of photo ID may apply free of charge to the Electoral Office for Northern Ireland for an Electoral Identity Card.

## How we developed a proof of identity scheme

1.6 We started from the position that any scheme for verifying identity at polling stations should be geographically consistent and compulsory and would:

- Be sufficiently robust to verify electors' identities.
- Be sufficiently accessible to electors.
- Provide for electors to obtain an alternative form of identification specifically for the purpose of voting if they did not have access to any other specified form of identification.
- Be cost-effective and affordable.

1.7 During 2014 and 2015 we sought further views and ideas on our recommendation from a number of groups. These groups represented young people, older people, Black, Asian and Minority Ethnic (BAME) groups, including the traveller community and disabled people. We also sought views from those who had criticised our recommendation and expressed concerns about the impact of introducing a requirement to present photo ID on liberty and privacy.

## Developing a cost model

1.8 In November 2014 we appointed an experienced financial modeller (Jack Avon) to develop a cost model to determine the cost of implementing a Northern Ireland-style, Electoral Identity Card scheme across Great Britain under a number of different scenarios. As in Northern Ireland, the card, which we have in this report termed "Voter Card", would be available free of charge to those who did not possess any other acceptable form of photo ID. The card would contain the holder's name and date of birth, together with certain security features, but would not contain any biometric information and is not in any sense a national ID card.

1.9 As well as estimating the cost of designing, producing and distributing Voter Cards, we worked with the financial modeller to estimate the financial impact of implementation on polling station procedures and staffing. We also estimated the costs of running public awareness activity to support implementation.

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<sup>2</sup> The requirement was introduced under the provisions of the Electoral Fraud (Northern Ireland) Act 2002 and applied for the first time at the November 2003 Northern Ireland Assembly elections.

1.10 The financial modeller estimated that the cost of implementing a Voter Card scheme across Great Britain would range between £1.8m and £10.8m per annum, depending on the method of implementation.

1.11 Our recommended implementation options would cost between £1.8m and £2.9m per annum for a “stand-alone” option (which would see the setting up of a “non-electoral” organisation to run the scheme) and between £2.4m and £6.4m per annum for an option involving the outsourced production and distribution of Voter Cards, with local Electoral Registration Officers retaining control over the card application process. Further information about the implementation options we considered can be found in chapter 5 of this report.

## Structure of this report

1.12 In the next chapter, we provide information about how voters’ identities are verified elsewhere, using the examples of Northern Ireland and Canada. Chapter 3 discusses accessibility, security and the protection of personal data in relation to a proof of identity scheme. This is followed in Chapter 4 by an outline of the key assumptions we have made in developing a proof of identity scheme for polling station voters in Great Britain. Chapter 5 outlines a number of options for implementing a proof of identity scheme, including indicative costs for each, and recommends our preferred implementation options.

## 2 How are voters' identities verified in other democracies?

2.1 Many other democracies currently require voters to present some form of identification at the polling station.<sup>3</sup> International observers of elections in Great Britain have previously expressed concern about the absence of any requirement for electors to produce identification at polling stations.<sup>4</sup>

2.2 In this chapter, we provide further information about the current Northern Ireland voter identification scheme. For an international comparison, we have also included information about the scheme implemented in Canada.

### Voter identification in Northern Ireland

2.3 The Electoral Fraud (Northern Ireland) Act 2002 fundamentally changed the voter registration system in Northern Ireland. The Act was introduced primarily to combat perceptions of electoral fraud that had existed in Northern Ireland for many decades. It replaced the system of household registration with individual electoral registration, whereby all eligible persons had to register individually on an annual basis and provide personal identifiers in the form of date of birth, National Insurance number and signature. The Act also required voters to produce a specified form of photo ID at polling stations before being issued with a ballot paper.

2.4 Before this, between 1985 and 2002, voters in Northern Ireland were required to present one of a number of specified identity documents at the polling station. The list included a number of non-photographic identity documents. Nonetheless, the system was considered to be inadequate because of the ease with which identity documents could be falsified and the fact that non-photographic identity documents were regarded as providing insufficient proof of identity.

2.5 These limitations resulted in the adoption of the photographic voter identification scheme in Northern Ireland, which was applied for the first time at the November 2003 Northern Ireland Assembly elections. The scheme applies to all of Northern Ireland's 1.2m electors.

2.6 In Northern Ireland, elections and electoral registration are administered centrally by the Chief Electoral Officer (CEO), who is a statutory officer appointed by the Secretary of State for Northern Ireland. The CEO is assisted by the staff of the

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<sup>3</sup> See Appendix A of the Electoral Commission's January 2014 report *Electoral fraud in the UK: Final report and recommendations* for examples of ID requirements in a selection of other countries: [http://www.electoralcommission.org.uk/\\_data/assets/pdf\\_file/0008/164609/Electoral-fraud-review-final-report.pdf](http://www.electoralcommission.org.uk/_data/assets/pdf_file/0008/164609/Electoral-fraud-review-final-report.pdf)

<sup>4</sup> See OSCE/ODIHR Election Assessment Mission Report on the 2010 UK general election (<http://www.osce.org/odihr/elections/69072?download=true>).

Electoral Office for Northern Ireland (EONI), the administrative structure created to support the CEO in the discharge of his duties.<sup>5</sup>

2.7 The CEO's 2003-04 report concluded that the photo ID scheme in Northern Ireland had "almost entirely removed the opportunity for personation". Since the introduction of photo ID in Northern Ireland there have been no reported cases of personation. Voters' confidence that elections are well-run in Northern Ireland is consistently higher than in Great Britain, and there are virtually no allegations of electoral fraud at polling stations.

### **Verifying the identity of voters at polling stations in Northern Ireland**

Voters at polling stations in Northern Ireland are required to produce one of the following documents to confirm their identity:

- A UK, Irish or EEA driving licence (photographic part) (provisional accepted).
- A UK, Irish or EU passport (EU passports are not accepted at UK Parliamentary elections).
- A specified public transport pass.<sup>6</sup>
- An Electoral Identity Card issued by the Chief Electoral Officer for Northern Ireland.

The document does not need to be "current", but the Presiding Officer must be satisfied that the photograph is of a good enough likeness before issuing a ballot paper.

2.8 The list of acceptable identification documents in Northern Ireland includes an Electoral Identity Card, which an elector can apply for free of charge by post or in-person from the EONI, which administers the scheme. While the Electoral Identity Card is intended only for voter identification purposes, the card "has come to be widely accepted as proof of identity for many purposes including access to financial services, travel and entry to licensed premises".<sup>7</sup> Electoral Identity Cards with a Braille overlay are available for blind or partially sighted electors.

2.9 Since 2008, EONI staff have visited schools to encourage young people to register to vote as well as apply for an Electoral Identity Card. Approximately 50% of attainments are added to the register in this way, with the Electoral Identity Card being viewed as a positive incentive to register by many young people.

2.10 Evidence from the EONI suggests that more than half of voters present a driving licence to confirm their identity at the polling station, with approximately a

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<sup>5</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/461523/Electoral\\_Office\\_Report\\_Sept\\_2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461523/Electoral_Office_Report_Sept_2015.pdf)

<sup>6</sup> The specified public transport passes are a Translink Senior SmartPass; a Translink 60+ SmartPass; a Translink War Disabled SmartPass; and a Translink Blind Person's SmartPass.

<sup>7</sup> Chief Electoral Officer for Northern Ireland (2010) *Report of the Chief Electoral Officer for Northern Ireland 2009-2010*, p. 31.



quarter presenting a passport. Approximately 10% of voters present a specified public transport pass, with a similar proportion using an Electoral Identity Card.<sup>8</sup>

### **Awareness and understanding**

2.11 There have now been nine electoral events in Northern Ireland since the Electoral Fraud (Northern Ireland) Act 2002 introduced the photo ID requirement.<sup>9</sup> Levels of public awareness about the ID requirements remain high.

2.12 At the 2003 Northern Ireland Assembly elections (the first at which the photo ID requirement applied), less than one per cent (3,493 people) of the total number of people who voted turned up and presented incorrect photo ID. Many of these voters returned later in the day with the correct form of photo ID.<sup>10</sup> Our survey found that 5% of non-voters (approximately 25,000 potential voters) cited not possessing any of the prescribed forms of photo ID as a reason for not voting. These figures were broadly consistent with those for 2007.

2.13 Our report on the 2007 Northern Ireland Assembly election also found that 99% of voters surveyed indicated that they had experienced no difficulties with the photo ID requirement on polling day. This percentage has largely remained unchanged since photo ID was introduced. Our post-election survey following the 2011 Northern Ireland Assembly elections found that no-one cited not possessing any of the prescribed forms of photo ID as a reason for not voting.

2.14 While voters understand the requirement for photo ID, they do need to be reminded to bring it with them on polling day. There is, however, little evidence of voters being turned away from the polling station for presenting an incorrect form of identification.

### **Scale and costs**

2.15 According to the EONI almost 100,000 Electoral Identity Cards were issued during the first year of implementing the new requirement. This represented approximately 10% of the registered electorate at that time. On average, 25,000 new or replacement cards are issued annually, of which half are provided to those registering to vote at schools for the first time.

2.16 The cost of introducing the Northern Ireland Electoral Identity Card scheme up to June 2003 was approximately £1.7m. The cost of implementing the Electoral Identity Card scheme included significant initial setup costs involving data capture and validation as well as card production and distribution. Production of Electoral

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<sup>8</sup> Figures based on data produced between 2003 and 2007; EONI have not collected this data since 2007.

<sup>9</sup> These were the 2003 Northern Ireland Assembly elections; the 2004 European Parliament elections; the 2005 UK general election (combined with local government elections); the 2007 Northern Ireland Assembly elections; the 2009 European Parliament elections; the 2010 UK general election; the 2011 Northern Ireland Assembly election (combined with local government elections and the AV referendum); the 2014 European Parliament elections (combined with local government elections); and the 2015 UK general election. In cases of combined elections, voters would have only needed to present their ID once to the Presiding Officer to be issued with all of the relevant ballot papers.

<sup>10</sup> [http://www.electoralcommission.org.uk/\\_data/assets/file/0009/99108/NI-2003-report.pdf](http://www.electoralcommission.org.uk/_data/assets/file/0009/99108/NI-2003-report.pdf)

Identity Cards in Northern Ireland was initially outsourced, but the EONI switched to the in-house production of the cards from 2009. This resulted in a significant reduction in the annual cost of producing the cards (from approximately £100K per year in 2008/09 to approximately £42K per year in 2012/13).

2.17 Presiding Officers in Northern Ireland did not require any additional training following the move to the photo ID requirement, other than being told what the new acceptable forms of ID were. Polling station staff are also issued with a placemat showing the acceptable identity documents that they can check when carrying out their duties.

2.18 The Electoral Commission spent almost £1m on its public awareness campaigns in Northern Ireland during 2002 and 2003, in order to publicise the new requirements around electoral registration and voter identification.

## Voter identification in Canada

2.19 Voter identification requirements for federal elections were introduced in Canada in 2007 as a guard against fraud. Electors in Canada must prove both their identity and residence when voting at federal elections. Three key considerations have guided the development of the voter identification policy in Canada:<sup>11</sup>

- Accessibility for electors who may face barriers in providing documentary proof of their ordinary place of residence.
- The integrity of the vote, including public confidence in the electoral system.
- The efficient administration of electoral events, whereby the process is seamless and the requirements are applied consistently.

### Verifying the identity of voters at polling stations in Canada

Voters at polling stations in Canada are required to provide documentary evidence of both their name and their address before casting their vote at a polling station. Electors have three options:<sup>12</sup>

- Provide one piece of identification issued by a Canadian government, whether federal, provincial or local, or an agency of that government, that contains a photograph of the elector and his or her name and address. Examples of these pieces may include a provincial or territorial driver's licence, a provincial or territorial identification card, a band membership card and, in some cases, a provincial or territorial health card. The document does not need to be current, but the Presiding Officer must be satisfied that the photograph is of a good enough likeness before issuing a ballot paper.

<sup>11</sup> See <http://www.elections.ca/content.aspx?section=res&dir=poli/rep1&document=index&lang=e>

<sup>12</sup> See <http://www.elections.ca/content.aspx?section=res&dir=poli/rep1&document=index&lang=e>

- Provide two pieces of identification of a type authorized by the Chief Electoral Officer, each of which establishes the elector's name and at least one of which establishes the elector's address. Currently there is a prescribed list of 45 types of document.
- Prove his or her identity and residence by providing two pieces of identification authorized by the Chief Electoral Officer, both of which prove his or her identity, and may instead prove his or her residence by taking a written oath. The elector must be accompanied by another elector whose name appears on the list of electors for the same polling division, who knows the elector personally, and who attests to the elector's residence. The elector who accompanies someone without proof of residence must have the required piece or pieces of identification proving identity and residence, and must not have attested for another elector, or have had his or her own address attested to, at the same election. He or she must also take an oath.

### **Impact on specific groups of voters**

2.20 Surveys conducted by Elections Canada (the independent, non-partisan agency responsible for conducting federal elections and referendums in Canada) for the seven by-elections held after the implementation of the new requirements, but before the 2008 Canadian general election (the first general election at which the new requirements applied) found that implementation went smoothly overall, with over 90% of electors being aware of the new requirements and being positive towards the idea of proving their ID. More than 94% found the new requirements easy to meet, while 4% said they did not vote as they did not have the required documentation. A similar proportion (approximately 4%) arrived at the polling station to find that they did not have the required ID, with most returning later with the correct ID or swearing an oath and being vouched for – 0.5% of these electors did not, in the end, vote.<sup>13</sup>

2.21 Elections Canada have identified the following groups of electors who are more likely to have difficulties in providing proof of identity and, in particular, their ordinary place of residence:

- Aboriginal people (First Nations, Inuit and Métis) and electors living on First Nations reserves.
- Electors living in long-term care facilities.
- Youth and students.
- Electors who are homeless.
- Electors who have recently moved or who have difficulty proving their physical address (such as those with rural PO boxes).

<sup>13</sup>[http://www.elections.ca/content.aspx?section=res&dir=rep/off/sta\\_2008&document=p3&lang=e#p3\\_2](http://www.elections.ca/content.aspx?section=res&dir=rep/off/sta_2008&document=p3&lang=e#p3_2)

2.22 These electors can prove their address by submitting a confirmation of residence form, which must be signed by the relevant administrators – for example, the administrator of a student residence, seniors' residence, long-term care facility, shelter, soup kitchen, First Nations' band or reserve, or Inuit local authority.

## 3 Balancing accessibility, security and privacy

3.1 The challenge in any democracy is achieving the appropriate balance between the accessibility and security of the electoral system. Security means ensuring everyone can be confident that their vote gets counted and that no one can steal or interfere with their vote. Accessibility means ensuring that everyone who is eligible to vote gets the chance to vote without facing unnecessary or disproportionate barriers. It is important to ensure the integrity of all electoral processes in the UK, but this must be balanced against the risks to effective voter participation.

3.2 This balance requires serious consideration in relation to any voter identification requirements at polling stations, which must take account of the likely impact on the accessibility of the voting process, either for all electors or particular groups of electors, and should include measures to minimise any adverse impact. Some stakeholders have also expressed concern about the impact of a proof of identity requirement on liberty and privacy. These issues are explored further in this chapter.

### Accessibility

3.3 One argument made against the introduction of photo ID requirements is that it would have a detrimental impact on voter participation. Critics point to the possible impact that voter identification schemes may have on citizens or groups (such as the poor, the elderly and certain BAME communities) who are disproportionately more likely to lack the requirements – for example, a passport or photographic driving licence. Voter identification laws can, it is argued, have a “discriminatory effect”.

3.4 We have been clear from the outset that any scheme would need to be geographically consistent and accessible; we would not support a scheme which would allow ID requirements to be varied locally, which could lead to accusations of partisanship shaping the design of schemes, as have been made in relation to voter ID schemes implemented in some US states.

3.5 As part of our review, we consulted a range of stakeholders to obtain their views on voter identification schemes and to understand any specific concerns they may have about the ability of the groups they represented to comply with any proof of identity requirement in polling stations.

3.6 Feedback received confirmed our view that the accessibility of any scheme for verifying the identity of voters in polling stations is fundamental. Stakeholders felt strongly that any scheme should incorporate a freely available form of identification, as in Northern Ireland, for electors who do not already possess any other acceptable form of identification and that the implementation of any scheme would require significant, timely and targeted public awareness activity. These measures, we were

informed, would help mitigate the risk that some groups will disproportionately feel the burden of voter identification laws.

3.7 The Commission believes that any voter identification scheme must be accessible to all; for this reason we recommend that any scheme must be backed up by a freely available photographic identification card, which electors can obtain easily should they lack any other acceptable form of photo ID. As well as this documentation being free of charge, the application process must be as accessible as possible, offering online as well as in-person and postal applications. Studies in the USA have highlighted the challenges experienced by some communities in obtaining free voter identification, particularly in states where the ID can only be obtained in person (for instance, from a far-away “ID-issuing office”), or where supporting documentation must be obtained at a cost (such as a birth certificate or naturalisation certificate) to obtain a state-issued photo ID document suitable for voting.<sup>14</sup>

3.8 Further information about the assumptions we have made to support an accessible proof of identity scheme (including the application process for obtaining a proof of identity document free of charge) is provided in chapter 4.

## Security

3.9 As well as being accessible, any proof of identity scheme for voters must also be secure, ultimately enhancing public confidence in the voting process by eliminating the risk of personation. As we have seen, the non-photographic scheme featured in Northern Ireland between 1985 and 2002 was abandoned in favour of a photographic system following concerns that the original scheme was not secure enough and was potentially open to abuse. Provisions requiring electors to sign for their ballot papers at polling stations, which were included in the Electoral Administration Act 2006 but which have not been commenced, would not provide an adequate check against personation as they currently stand since they do not allow signatures to be checked against another signature or other form of identification, nor do they provide a clear sanction to withhold a ballot paper should an elector refuse to sign.

3.10 In practice, a secure voter identification system should have the following features:

- A requirement to show photographic (as opposed to non-photographic) identification at the polling station.
- A list of approved photographic identification documents, each of which gives a certain level of assurance as to the holder’s identity and which is difficult to forge or alter. The list must include a Voter Card, which would be available free

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<sup>14</sup> See Keesha Gaskins and Sundeep Iyer (2012) *The Challenge of Obtaining Voter Identification*, Brennan Center for Justice at New York University School of Law. Available at: [http://www.brennancenter.org/sites/default/files/legacy/Democracy/VRE/Challenge\\_of\\_Obtaining\\_Voter\\_ID.pdf](http://www.brennancenter.org/sites/default/files/legacy/Democracy/VRE/Challenge_of_Obtaining_Voter_ID.pdf)

of charge for electors who do not possess any other form of acceptable photo ID.

- Secure application processes for the purposes of obtaining a Voter Card.
- A suitable level of training for polling station staff, so that they are easily able to identify approved ID at the polling station and to undertake the appropriate checks.

## Civil liberties and privacy

3.11 During our consultation, we heard concerns from some stakeholders about the potential impact that voter ID requirements could have on civil liberties and the protection of personal data. The Commission is clear that requiring electors to prove their identity at the polling station is necessary to reduce the risk of personation and address the main vulnerability of polling station voting.

3.12 We do not believe that a proof of identity scheme for voters should be linked to wider debates about identity cards and the so-called “database state”, although we acknowledge that some stakeholders have expressed concerns about sensitive personal information being collected (for example, when applying for a Voter Card) and potentially shared and misused. We are clear that any information submitted as part of an application for a Voter Card should only be used for the purpose of confirming that person’s identity and therefore entitlement to a card. Data should not be retained after the application has been processed.

3.13 We do not believe that implementing a scheme that will have, as a key feature, a freely available Voter Card, would need to be supported by the creation of any new databases to hold personal information. To reduce the risks around the giving and holding of personal data associated with the scheme, we recommend that it is integrated either with the Gov.UK Verify system to assure identity<sup>15</sup>, or alternatively with the online electoral registration system, which includes processes for verifying electors’ identity through existing DWP (Department for Work and Pensions) and local data sources.<sup>16</sup>

3.14 These approaches would, as far as possible, rely on data that is already held, meaning that no new, large databases would need to be created, thereby reducing any potential risks of personal data being held unnecessarily, transferred or misused, that might be introduced were the scheme implemented differently. While applications for Voter Cards would usually require the applicant to provide a photograph, we do not believe that this information would need to be held on a central database.

3.15 While Presiding Officers in polling stations should not record details of which form of photo ID has been provided against each individual elector, we do think that there would be merit (particularly during the initial implementation phase) in Presiding Officers monitoring which proportion of electors use which forms of photo

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<sup>15</sup> See <https://www.gov.uk/government/publications/introducing-govuk-verify/introducing-govuk-verify>

<sup>16</sup> See <https://www.gov.uk/register-to-vote>

ID, as well as the proportion of electors who are unable to produce any photo ID, in order to help assess the impact of a proof of identity scheme.



# 4 Key assumptions for a proof of identity scheme for voters in Great Britain

4.1 In this chapter, we set out the key assumptions we made to inform the development of the cost model to estimate the cost of implementing a proof of identity scheme in Great Britain. These assumptions cover the envisaged scope of the scheme; the proof of identity requirements; the extent to which people already hold suitable forms of photo ID; necessary safeguards to be put in place to ensure that the scheme is accessible, including the availability of a Voter Card and the need for public awareness campaigns; and how the scheme would operate on polling day.

## Key assumptions

### A Great Britain-wide scheme

4.2 We have assumed that a proof of identity scheme would apply consistently across all electoral areas in Great Britain and to all electors wishing to cast their vote at a polling station. We would not support the imposition of a temporary requirement to produce photo ID in specific constituencies or other electoral areas, a view echoed by those who responded to our consultation as part of our review of electoral fraud, as well as members of the public.<sup>17</sup> This is because such an approach could:

- Confuse electors (particularly if restrictions applied in specific wards in the same local authority area).
- Have a displacement effect: those intent on committing electoral fraud may respond to the imposition of restrictions in particular electoral areas by engaging in activity in other geographical areas, or parts of the system that are less likely to be detected.
- Be unworkable in practice: some electoral administrators said that implementing a “two-tier” system in a single local authority area would be difficult to administer.
- Increase concerns among voters that fraud must be widespread in areas where restrictions have been imposed.

4.3 Although we have assumed that the scheme would apply across Great Britain, we recognise that responsibility for Scottish Parliamentary and local government elections are due to be devolved to the Scottish Parliament. We also

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<sup>17</sup> [http://www.electoralcommission.org.uk/\\_data/assets/pdf\\_file/0008/164609/Electoral-fraud-review-final-report.pdf](http://www.electoralcommission.org.uk/_data/assets/pdf_file/0008/164609/Electoral-fraud-review-final-report.pdf)

recognise that the draft Wales Bill proposes the devolution of National Assembly for Wales and local government elections to the National Assembly for Wales. Any move towards a consistent, Great Britain-wide proof of identity scheme would therefore need to take account of the position in Scotland and Wales.

### **Defining the proof of identity requirements**

4.4 We have assumed that the identity document presented by the voter at the polling station must be a secure form of photo ID. Secure photo ID will enable Presiding Officers to determine with a greater level of certainty that the document presented identifies the holder. Non-photographic identity documents, such as a debit card, utility bill or poll card, would not offer the same level of proof of identity, and would enable personation to be committed more easily, since there would be no face-to-face authentication of identity required. For these reasons, secure photo ID has been the approach adopted in Northern Ireland since 2002.

4.5 Public opinion research undertaken on behalf of the Commission in 2014 found that, when asked to what extent people being required to show some form of photo ID at their polling station when they vote would increase their confidence in the way that elections are run in Great Britain, 63% said either a lot or a little. The equivalent percentage when asked whether non-photo ID would increase confidence was 44%. The same survey asked how effective showing photo ID at the polling station would be in preventing electoral fraud from taking place. 81% of respondents said that they felt this measure would be very effective or quite effective, compared with 46% when asked whether non-photo ID would be an effective check against electoral fraud.<sup>18</sup>

4.6 The accessibility of any proof of identity scheme will be influenced by how tightly or loosely the photographic identity requirements are prescribed. While any scheme should be as accessible as possible, approved forms of identification must have certain security features that make forgery or alteration difficult. At the same time, any scheme should be manageable in practical terms – for example, polling station staff should be able to recognise the photo ID as being approved and genuine relatively quickly and easily.

4.7 We therefore recommend that only forms of photo ID which possess certain security features and which require an adequate level of verification to obtain should be included in the list of acceptable ID. These include a photographic driving licence, passport, Proof of Age Standards Scheme (PASS) card, military identification card, police identification card and firearms licence. We believe that certain photographic public transport passes, including certain concessionary travel passes – could be added to this list. Both the Freedom Pass and Oyster Photocard, for example, require verification of the person's identity before they are issued.

4.8 It is possible that other forms of photo ID (such as some student cards, company ID cards and local authority issued public transport passes) could be added to the list of acceptable ID, but it would need to be demonstrated that they possessed the required level of security and would not result in a system that was administratively unwieldy and unnecessarily complex.

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<sup>18</sup> Electoral Commission Winter Tracker 2014.

## The availability of photographic ID in Great Britain

4.9 The financial modeller collected data from a range of sources<sup>19</sup> in order to estimate the number of electors who likely already hold at least one of the acceptable forms of photo ID we have identified and the numbers who likely do not.

4.10 Based on a Great Britain electorate of approximately 46m<sup>20</sup>, and based on the inclusion of the forms of ID listed in paragraph 4.7 above, the financial modeller estimated that:

- Approximately 3.5m electors (7.5% of the electorate) would have none of the forms of photo ID highlighted, i.e. 92.5% of electors would already have at least one form of acceptable photo ID.
- Limiting acceptable ID to passports and photographic driving licences would see potentially 11m electors, or 24% of the electorate, without acceptable ID;
- Allowing only passports, photographic driving licences and Oyster Photocards to be used reduce the number of electors without ID to 6m, or 13% of the electorate.

4.11 It is important to acknowledge that some groups will be less likely than the general population to hold certain forms of photo ID. Older people, for example, are less likely to hold passports, as well as people living in certain parts of Great Britain, notably Wales, where 80% of the population hold a passport, compared with 94% in London.

4.12 Among ethnic groups, data from the 2011 Census suggest that the average across all ethnicities of holding an eligible passport is 85%. People from the following ethnic groups are least likely to hold an eligible passport:

- 'White: Gypsy or Irish Traveller' (66% hold an eligible passport)
- 'White: English/Welsh/Scottish/Northern Irish/British' (83% hold an eligible passport)
- 'Mixed/multiple ethnic groups: White and Black Caribbean' (just under 85% hold an eligible passport)

4.13 As a separate issue, research indicates that certain ethnic groups are less likely to be registered. The Commission's report on *The quality of the 2014 electoral registers in Great Britain*<sup>21</sup> indicates that completeness<sup>22</sup> of the electoral register

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<sup>19</sup> Sources were the Office for National Statistics (ONS) and National Travel Survey (TFS) statistics for passport data; Driver and Vehicle Licensing Agency (DVLA) for driving licence data; the Home Office for firearms data and police data; Transport for London (TfL) for Oyster Card data; London Councils for Freedom Pass data; [www.ukarmedforces.co.uk](http://www.ukarmedforces.co.uk) for Military passes data; Proof of Age Standards Scheme (PASS) for PASS data.

<sup>20</sup> Based on 1 December 2013 electorate figures.

<sup>21</sup> [http://www.electoralcommission.org.uk/\\_data/assets/pdf\\_file/0005/169889/Completeness-and-accuracy-of-the-2014-electoral-registers-in-Great-Britain.pdf](http://www.electoralcommission.org.uk/_data/assets/pdf_file/0005/169889/Completeness-and-accuracy-of-the-2014-electoral-registers-in-Great-Britain.pdf)

varies by ethnicity, with those identifying as White or Asian having higher levels of completeness (85.9% and 83.7% respectively) than those claiming Black (76%), Mixed (73.4%) or other (62.9%). Our report entitled *Electoral registration in 2011*<sup>23</sup> provides a further breakdown and shows that Black Africans are the least likely to be registered (73.3% in England and Wales) among persons of Black ethnicity and those with Caribbean origin are only marginally less likely to be registered than the overall population (81.7%). Among Asians, those whose ethnicity is Indian have a higher level of completeness than Pakistani and Bangladeshi people.

4.14 Driving and Vehicle Licensing Agency (DVLA) data suggests that women in particular and those under 20 and over 65 are less likely to hold a driving licence. People in London also have the lowest rate of holding a driving licence regionally, whereas those in smaller communities or rural areas are more likely.

4.15 Public awareness campaigns and partnership work will therefore be needed to raise awareness of the ID requirements among these citizens, so that they take steps to obtain alternative photo ID and, if necessary, register to vote.

### **Bridging the gap – the Voter Card**

4.16 The Northern Ireland voter identification scheme is backed up by an Electoral Identity Card issued by the Electoral Office for Northern Ireland (EONI), which is made available free of charge to electors who do not possess any of the other acceptable forms of photo ID. At the same time, it provides a level of security that virtually eliminates the risk of personation.

4.17 We recommend that a scheme backed by the free availability of a Voter Card should be the model adopted for Great Britain. The Voter Card would carry the photograph of the holder, along with their name and date of birth, although it would not include the holder's address. This is because the Voter Card would constitute proof of identity (which would be a check against personation at polling stations), but not proof that the card holder is on the electoral register at a particular address. This additional check of the elector's registration status would be carried out when the elector presents at the polling station. The Voter Card would also carry security features, including a custom hologram image, to make it hard to forge and alter.

4.18 As noted, if the photo ID requirements are prescribed as widely as possible, we estimate that approximately 7.5% of the Great Britain electorate would be without suitable photo ID and would therefore need to apply for a Voter Card. The vast majority of electors would therefore not need a Voter Card and would bring another approved form of ID with them to the polling station.

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<sup>22</sup> By **completeness** we mean that 'every person who is entitled to have an entry in an electoral register is registered'. The completeness of the electoral registers therefore refers to the percentage of eligible people who are registered at their current address. The proportion of eligible people who are not included on the register at their current address constitutes the rate of non-registration.

<sup>23</sup> [http://www.electoralcommission.org.uk/\\_data/assets/pdf\\_file/0006/169890/Electoral-Commission-Census-2011.pdf](http://www.electoralcommission.org.uk/_data/assets/pdf_file/0006/169890/Electoral-Commission-Census-2011.pdf)

## **A proof of identity scheme for voters at polling stations in Great Britain**

Voters at polling stations in Great Britain should be required to produce one of the following photographic documents to confirm their identity before being issued with a ballot paper:

- A UK, Irish or EEA driving licence (provisional accepted).
- A UK, Irish or EU passport (EU passports would not be accepted at UK Parliamentary elections).
- A passport issued by a Commonwealth member state, subject to the issuing process meeting recognised security standards.
- A Voter Card issued free of charge to any elector.
- Other specified photographic identification documents which require an adequate level of identity verification, including: Proof of Age Standards Scheme (PASS) card; military identification card; police identification card; firearms licence; some photographic public transport passes, including the Freedom Pass and Oyster Photocard, for example.

Other forms of acceptable photographic identification could be added to the scheme in future.

The identification document would not need to be current, but the Presiding Officer must be satisfied that the photograph is of a good enough likeness before issuing a ballot paper.

### **Applying for the Voter Card**

4.19 In Northern Ireland, electors can apply for an Electoral Identity Card in person or by post. In-person applications may be made at any Area Office of the EONI, where the applicant's photograph is taken free of charge. People applying in this way do not need to provide identification, although they must be on the electoral register and provide their National Insurance number.

4.20 Applications by post can be made by completing a form, enclosing a colour, passport-sized photo with the applicant's name and date of birth written on the back; and enclosing a specified form of photo ID with the application, or a declaration completed by an elected representative (Member of Parliament, Member of the European Parliament, Member of the Northern Ireland Assembly or Councillor). As noted in chapter 2, the EONI has since 2008 run a "schools initiative", involving their staff visiting schools every autumn to encourage eligible young people to register and apply for an Electoral Identity Card.

4.21 People in Great Britain should also be able to apply for a Voter Card in person and by post along similar lines to the process for obtaining an Electoral Identity Card in Northern Ireland, i.e. by submitting appropriate photo ID or a declaration. Outreach work would also be necessary to encourage young people and other groups to apply, as is the case in Northern Ireland.

4.22 However, we would also recommend the development of an online application service to increase the convenience and accessibility of obtaining a card, without

requiring the submission of paper documentation as part of the application process. We believe that online applications for the Voter Card could be enabled either:

- (a) By minimal modification of the online electoral registration system to produce a combined electoral registration/Voter Card online portal that is integrated with existing processes for verifying electors' identity (i.e. through Department for Work and Pensions records and local data sources).
- (b) By integrating the application process with the Gov.UK Verify service, which is the new way that citizens can prove their identity as a prerequisite for using digital government services. If this option were pursued, then further work would need to be carried out to add more official validation services to ensure that people who do not have a driving licence or passport (who would be more likely to need a Voter Card and which is currently a prerequisite for using Gov.UK Verify), would be able to apply for a Voter Card online. We understand that the UK Government intends to carry on developing and expanding Gov.UK Verify "so it will work for more people over time".<sup>24</sup> This work will be crucial to ensuring that the Gov.UK Verify service is a viable option for an online Voter Card application process.

4.23 As part of our review, we considered whether conducting an electoral registration check must form part of the Voter Card application process, as is conducted by EONI when processing applications for Electoral Identity Cards in Northern Ireland. If the process were integrated with the existing electoral registration process along the lines outlined in (a) above, then this may be possible.

4.24 On the other hand, it could be argued that the key requirement when checking a person's Voter Card application is not whether they are on the electoral register (since this check would be carried out when a person attends the polling station), but whether their identity can be verified. As explained previously, it is the process of verifying a person's identity – first when they apply for a Voter Card and second when they turn up to vote – that provides the check against personation. For this reason, we think it would be possible to implement a scheme that did not require an electoral registration check prior to being issued with a Voter Card, using the Gov.UK Verify service. This would represent a departure from the Northern Ireland scheme and open up the possibility of different implementation models, as explained in chapter 5.

### **Polling station procedure**

4.25 As in Northern Ireland, we have assumed that the poll clerk would normally check the elector's identity document at the polling station and would consider three issues when checking the ID: (a) is the document on the list of acceptable documents? (a placemat would be made available for this purpose); (b) is it genuine?; (c) am I satisfied that the voter is the person shown on the document? If the poll clerk is not satisfied then they would refer the matter to the Presiding Officer.

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<sup>24</sup> See <https://identityassurance.blog.gov.uk/2014/10/14/gov-uk-verify-public-beta/>

4.26 The poll clerk would be required to compare the face of the voter with the photograph on the document presented. This raises the question of what the poll clerk should do if an elector's face is covered (for example, Muslim women who choose to wear a face veil). In this situation, the poll clerk would need to use great tact to explain to the elector that they cannot be issued with a ballot paper unless their face is shown. In this situation, and where practicable, the check should be carried out by a poll clerk of the same gender as the voter, either in a private room or screened off section of the polling station.

4.27 Any voter who forgot to bring their ID or presented the wrong ID would be asked to return home to fetch the correct document. This is a very uncommon occurrence in Northern Ireland. There would be no exceptions to the photo ID requirement.

4.28 Again, following the Northern Ireland system, we believe that approved photo ID should be valid indefinitely; there would be no expiry date on the Voter Card, which would remain valid provided that the elector still looked like the photograph. This rule would also apply to other acceptable forms of photo ID, as in Northern Ireland.

4.29 We considered the financial impact of implementation on polling station procedures and staffing; based on the Northern Ireland experience, we believe that these costs will be minimal.

### **Public awareness**

4.30 We have also assumed that significant public awareness campaigns would be needed to support implementation. We envisage these entailing a multi-media campaign at staggered intervals in the lead up to the first election at which the new voter ID requirements would apply (we have assumed that these will be the 2019 European Parliamentary and English local government elections), starting with the previous year's annual canvass to make sure people have the ID they need and culminating with a voter information campaign in the two months prior to polling day to make sure people take the ID with them when they vote. Public awareness campaigns would need to continue for the UK Parliamentary general election in 2020 and beyond, until awareness levels no longer required it. Non-paid for partnership work would also be key to contacting the hard-to-reach groups.

### **Minimum voting age**

4.31 To facilitate comparison across a range of implementation options, we have assumed a voting age of 18, although we recognise that the lowering of the voting age in Scotland for Scottish Parliamentary and local government elections will have some impact on the overall cost of a Voter Card scheme. We have therefore included an estimate of the additional cost that would be incurred as a consequence of lowering the voting age in Scotland.

# 5 Implementation options and indicative costs

5.1 In Northern Ireland, the Electoral Identity Card scheme is managed centrally by the Electoral Office for Northern Ireland (EONI). Applications can be made in person to any EONI Area Office or by post, while the Electoral Identity Card itself is produced in-house and distributed by EONI Headquarters in Belfast.

5.2 Implementing a similar (Voter Card) scheme in Great Britain presents a different set of challenges, not least the fact that electoral administration is decentralised, with 380 local Electoral Registration Officers (EROs) and Returning Officers (ROs) respectively being responsible for managing electoral registration and running elections in the electoral areas for which they are responsible. This presents potential logistical issues, as well as questions of scale, cost and nationwide consistency. Unlike in Northern Ireland, there is no obvious implementation option; rather, there are a range of options that could be considered and evaluated.

5.3 We therefore developed a number of implementation options that could be used to deliver a Voter Card scheme, together with an assessment of the costs and benefits of each option. In developing these options, we consulted a number of stakeholders, including individual members of the UK Electoral Advisory Board; the Elections, Referendums and Registration Working Group; the Association of Electoral Administrators; the SOLACE Elections & Democracy Sub-Committee; the Electoral Integrity Roundtable; and the national policing lead on electoral-related crime. The financial modeller who developed the cost model also undertook cost research, including detailed discussions with industry experts, to identify the relevant cost types in each cost capability.

5.4 The financial modeller estimated that the cost of implementing a Voter Card scheme would range between £1.8m and £10.8m per annum, depending on the implementation model adopted and assumptions made about best, mid and worst-case business scenarios.

## The cost model

5.5 The financial modeller's starting point in costing the implementation options was to develop a series of process maps in order to identify all of the steps and activities that would need to be undertaken to administer a Voter Card scheme, including receiving and processing applications, then printing and distributing the cards. The financial modeller then developed the capabilities associated with each process and analysed the cost types for each capability. The detailed costs for each cost type were based on cost research undertaken by the financial modeller.<sup>25</sup> Once

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<sup>25</sup> Cost types included IT hardware and equipment; software licensing; printing and distribution; IT infrastructure; staff resources; consumables/stationery; communications, including public awareness; transportation; property rentals; consulting and service management. The cost method was to obtain



the cost estimates were obtained, the financial modeller was able to build the cost model. The cost model provides a breakdown of set-up costs and ongoing costs and runs for the period 2018-2029.<sup>26</sup>

## Business scenarios

5.6 Implementation options were costed according to best, mid and worst-case business scenarios; this exercise enabled low, mid and high cost ranges to be estimated for each of the implementation options. Examples of the “drivers” having the potential to lead to different cost outcomes included:

- The extent to which the implementation of a Voter Card scheme would be able to leverage existing local authorities’ IT infrastructure; and the extent to which this IT would be of a robust nature to accommodate all the hardware, software, installations and network requirements of the scheme. Requiring local authorities to purchase completely new IT equipment to support implementation would significantly add to the costs of implementation.
- The extent to which local authorities would have the space and staff resources available to accommodate the envisaged footprint of the scheme, i.e. to process in-person and postal applications.
- The IT infrastructure needed to facilitate online applications. Business models factored into the costing included: (a) minimal modification of the online electoral registration system to produce a combined electoral registration/Voter Card online portal that is integrated with existing processes for verifying electors’ ID, including checking DWP records and local data sources; (b) integrating the online Voter ID card service with the Gov.UK Verify system to streamline process of verifying a person’s identity; (c) building a completely new digital system for facilitating online applications and verifying the applicant’s identity.
- How tightly or widely the photo ID requirements are prescribed. This will have an impact on the total number of Voter Cards that will need to be produced and therefore the overall cost of implementing any scheme.

5.7 A range of other organisational costs were included in the cost model. For example, the cost of setting up 11 regional printing and distribution “hubs” to deliver the regional-local scheme; the additional costs that would be incurred in setting up a national printing and distribution scheme; and the costs incurred in setting up a new,

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estimates at 2014 prices, and then baseline the costs to 2017 (inflation estimated at 3% per annum). Indexation is provided across the life of the cost model for matters such as staff costs, IT costs and refresh of equipment.

<sup>26</sup> Set-up costs included IT hardware and equipment; IT infrastructure implementation; fixtures, furniture and fittings; public awareness development; and refresh cycles over 10 years. Ongoing costs included software licensing; public awareness campaigns; staffing; property rentals; IT services; and consumables/stationery.

“stand-alone” organisation to administer the scheme. These options are explained in more detail in the next section.

## Summary of implementation options

5.8 The following implementation options were costed:

- Options based on the current electoral administration infrastructure, with 380 individual EROs being wholly responsible for administering the scheme, including processing applications, and printing and distributing Voter Cards.
- Options involving the national, regional or outsourced production and distribution of Voter Cards, with individual EROs only retaining control over the application process.
- A “stand-alone” option that would see a “non-electoral” organisation assuming responsibility for implementing and running all aspects of the Voter Card scheme.

5.9 Table 1 provides a description of the implementation options included in the cost model.

**Table 1: Overview of implementation options for Voter Card scheme in Great Britain**

<b>Implementation option for Voter Card scheme</b>	<b>Voter Card application process</b>	<b>Printing and distribution of Voter Cards</b>
Local authority-based scheme	In-person, postal and online applications received and processed by 380 EROs and their electoral services teams within each local authority.	Undertaken in-house by EROs and their electoral services teams within each local authority.
Regional-local scheme	In-person, postal and online applications received and processed by 380 EROs and their electoral services teams within each local authority.	Undertaken by 11 regional printing and distribution “hubs” set up specifically for that purpose, with each local authority aligned to a specific hub. <sup>27</sup>
Outsourcing-local scheme	In-person, postal and online applications received and processed by 380 EROs and their electoral services teams within each local authority.	Outsourced to a single national supplier, who would provide this service to the 380 EROs.  This option assumes that the supplier would have the necessary resources to manage the national

<sup>27</sup> The regions would be based on the 11 European electoral regions in Great Britain.

Implementation option for Voter Card scheme	Voter Card application process	Printing and distribution of Voter Cards
		production of cards and would quote on a cost-per-card basis.
National-local scheme	In-person, postal and online applications received and processed by 380 EROs and their electoral services teams within each local authority.	Undertaken by the Electoral Commission or other Great Britain-wide national body.
“Stand-alone” scheme	A new, “stand-alone” organisation would be established and assume primary responsibility for the receipt and processing of in-person, postal and online applications.	The “stand-alone” organisation would assume sole responsibility for the printing and distribution of Voter Cards. Local authorities would have a very limited, if any, role under this option. <sup>28</sup>

## Indicative costs

5.10 The table at Appendix A provides an overview of the high, mid and low cost ranges by each implementation option. For each option, the “total cost” (reflecting the total cost over the 2018-2029 period) is presented alongside the annual cost. The costs presented in Appendix A are “high level”; the cost model itself allows for a more detailed breakdown of the various cost types.

5.11 The costs vary significantly. The most costly option is the **national-local scheme**, which assumes that printing and distribution of Voter Cards would be undertaken by the Electoral Commission, or other Great Britain-wide body. The lowest total cost for this scheme would be £33.5m over the lifetime of the cost model, or £3m per annum, with the highest estimated costs amounting to £119m over the same period, or £10.8m per year. The mid-range cost estimate for this scenario is £78.8m over the lifetime of the cost model, or £7.2m per year.

5.12 A scheme based on the setting up of **11 regional “hubs”**, which would handle the printing and distribution of Voter Cards for EROs within each European electoral region, would cost between £29.6m, £53.8m and £80.6m over the cost model’s lifetime, or between £2.7m, £4.9m and £7.3m per year.

5.13 An **entirely local authority-based scheme**, which would see EROs being responsible for all aspects of the process from receiving and processing applications

<sup>28</sup> Under this option, we would expect local authorities to forward Voter Card applications sent by error to the ERO on to the “stand alone” organisation and to offer assistance to electors experiencing difficulties with their applications, but we would expect this involvement to be very limited and on an “exception basis”.

to the printing and distribution of cards, would cost between £32.8m, £54.6m and £79.5m over the lifetime of the cost model, or between £3m, £5m and £7.2m per year.

5.14 An option based on the **outsourcing of the printing and distribution of Voter Cards to a single national supplier** would cost between £26.4m, £47.0m and £70.2m over the lifetime of the cost model (between £2.4m, £4.3m and £6.4m per year).

5.15 The **“stand-alone” scheme** appears to be the most cost effective of the options. The cost model estimates that the lowest total cost for this scheme would be £19.4m or £1.8m per year. The highest estimated costs for this option total £31.6m, or £2.9m per year. A middle cost estimate would be £23.9m over the lifetime of the cost model, or £2.2m per year. The principal explanation for the lower costs associated with the “stand-alone” scheme is the fact that other schemes are more “fragmented” and therefore dependent on significant integration of processes and systems – for example, between local authorities and the Electoral Commission; local authorities and regional “hubs”; or local authorities and an outsourcer. A “stand-alone” scheme enables the entire process to be managed “end-to-end” (i.e. from application to distribution) and is therefore better placed to deliver cost savings.

5.16 Public awareness costs have been included in the cost model and in the indicative figures outlined above. We have estimated that these initial, implementation phases of public awareness activity would incur costs of £12.83m (£1.33m production costs; £11.5m media costs). A separate breakdown of indicative public awareness costs is provided at Appendix B.

5.17 It should be noted that the costs and type of public awareness activity undertaken would depend on the timing and nature of the ID scheme adopted. The public awareness strategy would therefore be reviewed fully and developed in detail only once the details of any proposed ID are known. For this reason, the costs at Appendix B should be treated as indicative only.

5.18 The financial modeller estimated that the effect of the lowering of the voting age in Scotland would result in a £486K additional cost over the lifetime of the cost model (2018-2029).<sup>29</sup>

## Narrowing down the options

5.19 The costing exercise shows wide variations in implementation costs dependent upon the scenarios modelled.

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<sup>29</sup> Approximately £350K of this increase would cover set-up costs during Year 0 and Year 1, which include an expanded outreach programme, and increase in hardware (printers, laptops, backdrops and infrastructure costs (data hosting)), with the remainder being ongoing costs incurred in Year 1. The main effect of lowering the voting age in cost terms would be to shift established costs, which include a ramp up of resources at registration and polling stations; an initial increase in software licencing and a movement of consumables, including stationary, from towards the end of the project to the beginning of the project, since there would be more 16 and 17 year olds registering and then requiring cards during this initial period.

5.20 Of the options modelled, the national, regional and entirely local authority-based schemes are the most costly. Our initial assessment is that these options should not be pursued further and that attention should focus on the implementation scenarios which offer more cost effective solutions, i.e. the “stand-alone” scheme and the outsourcing-local scheme, which would cost between £1.8m and £2.9m, and £2.4m and £6.4m per year respectively to implement.

#### **Preferred implementation options for delivery of a Voter Card scheme in Great Britain**

Several of the implementation options that we considered (specifically those which incorporate a national, regional or entirely local delivery structure) would not be cost-effective and we recommend that these should be discounted.

The outsourcing-local and “stand-alone” schemes appear to be the most cost-effective. We recommend that they are pursued and discussed further, and that the Information Commissioner is involved in these discussions at an appropriate stage.

## Appendix A: Voter Card implementation options: high-mid-low cost ranges

Implementation option	High		Mid		Low	
	Total cost (Years 0-10)	Annual cost	Total cost (Years 0-10)	Annual cost	Total cost (Years 0-10)	Annual cost
National-local scheme	£119.2m	£10.8m	£78.8m	£7.2m	£33.5m	£3.1m
Regional-local scheme	£80.6m	£7.3m	£53.8m	£4.9m	£29.6m	£2.7m
Local authority-based scheme	£79.5m	£7.2m	£54.6m	£5.0m	£32.8m	£3.0m
Outsourcing-local scheme	£70.2m	£6.4m	£47.0m	£4.3m	£26.4m	£2.4m
“Stand-alone” scheme	£31.6m	£2.9m	£23.9m	£2.2m	£19.4m	£1.8m

## Appendix B: Public awareness campaign – voter photographic ID in polling stations in Great Britain: indicative costs

All costs include VAT and will be subject to inflation.

Campaign element	Cost	Assumptions
Creative development testing	£60,000	Based on 2015 general election cost of £51,000
Production	£500,000	Based on 2015 general election cost of £454,000
Stakeholder materials	£20,000	Based on 2015 general election cost of £15,000
Call centre	£350,000	Based on 2015 general election cost of £91,584. Cost is based on four operation stages
Tracking research	£400,000	Based on 2015 general election cost of £80,000 for two waves. Cost is based on five-six waves.
<b>Total</b>	<b>£1,330,000</b>	

Media is broken down by campaign stage.

Campaign element	Cost	Assumptions
Annual canvass campaign (September 2018)	£5,500,000	TV, Video on Demand (catch-up TV), Radio, Online display advertising, Paid for search (Google)
European Parliamentary elections voter info campaign (April 2019)	£1,500,000	TV, Video on Demand (catch-up TV), Radio, Online display advertising, Paid for search (Google)
Annual canvass campaign (September 2019)	£2,500,000	TV, Video on Demand (catch-up TV), Radio, Online display advertising, Paid for search (Google)
UK Parliamentary general election voter info	£2,000,000	Based on 2015 general election registration campaign

campaign (April 2020)		
<b>Total</b>	<b>£11,500,000</b>	

### Registration campaign

The costs below show our assumptions for the registration campaign that is expected to run regardless of whether voter ID is introduced. Costs are based on the 2015 general election campaign; some costs, such as the call centre, will be duplications so will be revisited/combined if the voter info campaign goes ahead.

<b>Campaign element</b>	<b>Cost</b>	<b>Assumptions</b>
Registration campaign 2019	£3,034,100	or £2,600,000 using existing creative. Based on 2015 general election cost
Registration campaign 2020	£3,034,100	or £2,600,000 using existing creative. Based on 2015 general election cost