

A. CHILDREN'S RIGHTS IMPACT ASSESSMENT

1. Policy objectives

The Representation of the People (Registration without Applications) (Wales) Regulations 2026 enables all local authorities in Wales to conduct electoral registration without application, also known as automatic voter registration (AVR) in relation to the local government electoral register in Wales. This includes building on the extension of the franchise to 16- and 17-year-olds and to identify attainers (a person who is not yet old enough to vote but will reach the required voting age during the lifetime of the electoral register) from the age of 14.

Education data held by a local authority will be used to identify attainers from the age of 14. If eligible these young people would then be automatically registered as attainers. The data of young people and attainers will be protected, and they will be notified of how their information is held and used.

2. Gathering evidence and engaging with children and young People

Whilst the Welsh Government has not consulted directly with children and young people on AVR as a singular topic, in 2022 it consulted on AVR as part of a wider Electoral Administration and Reform White Paper.¹ As part of the consultation, a version for young people was published.² There were 39 responses received to the youth friendly version of which the majority were broadly supportive of those provisions which impact most on young people. One specific question relating to AVR in the youth friendly version was *"How would you want to be told you have been registered to vote automatically and that your personal data is safe?"*, some respondents requested that anyone registered to vote automatically was informed via letter directly to the elector, which is the approach that was undertaken in the pilots and will be implemented in the roll out of AVR across Wales.³

A [summary of the consultation responses](#) is published on the Welsh Government's website.

A White Paper launch event for young people was held. The Welsh Government also engaged with children and young people through networks and events and have supported a number of organisations through its Democratic Engagement Grant who work directly with young people on the importance of democracy and having their voices heard. For example, officials met with members of the Boys and Girls Club and information on the consultation and how to respond was included in the Dysg newsletter, which is the official education and training e-newsletter published by the

¹ [Consultation on the electoral administration and reform White Paper \[HTML\] | GOV.WALES](#)

² [Making it easier to vote - Electoral Administration and Reform White Paper](#)

³ [Summary of responses](#)

Welsh Government and circulated to educators, school leaders, and training providers across Wales.

3. Analysing the evidence and assessing the impact

Research undertaken by the Electoral Commission on the completeness and accuracy of electoral registers suggests that young people are less likely to be registered to vote.⁴ The requirement for Electoral Registration Officers (EROs) to add people to the local government register without application would therefore disproportionately benefit this under-registered cohort.

In two of the local authorities that took part in an AVR pilots, 1,500 attainers were registered. The Office for National Statistics estimates that in each Gwynedd and Powys there are approximately 2,700 to 2,800 people aged 14 – 15 years. The attainers added to the local government register in the pilots therefore represent between 16 and 37% of all potential attainers in those areas.⁵

- How does your proposal enhance or challenge children’s rights, as stipulated by the [UNCRC articles](#) and its Optional Protocols?

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
<i>Article 2 - The Convention applies to everyone whatever their race, religion, abilities, whatever they think or say and whatever type of family they come from.</i>	X	X	Automatic registration is intended to identify all eligible electors not currently registered regardless of race, religion, abilities etc, including young people. As education data will be used to identify eligible young electors, those not in mainstream education may not be as easily identified which could be a challenge to EROs in being able to automatically register them.
<i>Article 5 - Governments should respect the rights and responsibilities of families to direct and guide their children so that, as they grow, they</i>		X	Experience from the pilot scheme showed that some families were not comfortable with their young people being automatically registered or without prior consent or parental involvement.

⁴ 2023 report: [Electoral registers in the UK | Electoral Commission](#)

⁵ [Automatic registration pilots evaluation | Electoral Commission](#)

<p><i>learn to use their rights properly</i></p>			
<p><i>Article 12 - Children have the right to say what they think should happen, when adults are making decisions that affect them, and to have their opinions taken into account.</i></p>	<p>x</p>		<p>AVR enhances Article 12 by improving the registration rates of young people eligible to vote, and helping them to be registered as soon as they are eligible. They are then able to exercise their democratic right and vote according to their own opinions when an election occurs.</p>
<p><i>Article 13 – Children have the right to get and to share information as long as the information is not damaging to them or to others.</i></p>	<p>X</p>	<p>X</p>	<p>Young people will be informed by letter, addressed to them directly, of the intention to register them automatically as part of this process. They will be able to request more information from the ERO if they are unclear of the automatic registration process or have questions.</p> <p>Experience in the pilots showed that some parents who did not agree with their children being contacted intercepted these letters and contacted the ERO to complain or opt-out on their child’s behalf. As the legal age for voting in Welsh elections is 16 and children who will reach voting age with a registration cycle can be registered as ‘attainers’ EROs make every effort to inform concerned parents of the rights of children to be registered by the 16th birthday.</p>

<p><i>Article 16 - Children have a right to privacy. The law should protect them from attacks against their way of life, their good name, their families and their homes.</i></p>	<p>X</p>	<p>X</p>	<p>EROs will be using young people’s data to identify attainers for the electoral register. This may cause concern for some individuals or their parents as they may not expect education data to be used in this way. AVR does also enhance Article 16 as it provides additional protection for the handling of data of those under 16 years old. The Data Protection Impact Assessment for the Regulations provide more detail on the safeguards contained for the protection of young people and their data. In preparation for the implementation of AVR, the local government edited register, (which allowed third parties to purchase the register) has been abolished.</p>
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Automatic registration could help to address one of the [UN Concluding Observations](#) on the Convention on the Rights of the Child, particularly in relation to ‘Respect for the views of the child’. Automatically registering young people as soon as they are eligible to vote means that they will be able to democratically express their views as soon as they are able after reaching the age of 16. Automatically registering young people removes barriers and provides access to meaningful participation in the decision-making process in Wales and contributing to the right of the child to be heard.

4. Ministerial advice and decision

As research undertaken by the Electoral Commission indicates that young people are less likely to be registered to vote, AVR seeks to address this democratic deficit. This information and an assessment of children’s rights has informed Ministerial advice to aid their decision making process in respect of AVR.

5. Communicating with Children and Young People

In 2022 the Welsh Government consulted on AVR as part of a wider Electoral Administration and Reform White Paper and 39 responses received to the youth friendly version of which the majority were broadly supportive of those provisions which impact most on young people.

The Welsh Government has engaged with children and young people through networks and events and have supported a number of organisations through its Democratic Engagement Grant who work directly with young people on the importance of democracy and having their voices heard. Previous correspondents to consultations are anonymous so we are not able to identify individuals to receive further feedback on the policy and its implementation. However, Welsh Government will continue to engage with young people on electoral policy development and through channels such as the Democratic Engagement Grant scheme..

All electors will be notified that they have been registered automatically via a letter from their local authority, this is the same process as the annual canvass or if they were to be contacted with an invitation to register. If young people have any concerns regarding the automatic registration process, or if they decide they would like to opt out of automatic registration, the notification letter they receive will provide contact details of their local authority who can provide them with more information. Local authorities will ensure that the communications are accessible and have the option to provide additional information alongside the statutory notification where they feel it may benefit the individual, such as including QR codes linking to more information or additional leaflets for clarity.

6. Monitoring and Review

The impact of AVR on the electoral register will be monitored through the electoral management systems providing data on the numbers registered automatically. The Electoral Commission also reports regularly on registration practices in Wales and Welsh Government will continue to use these sources to monitor the impact of AVR and where possible obtain statistics on the different demographics of people registered, including young people.

The CRIA is a live document and will be updated with any changes to the regulations or other impacts on young people.