##

## RNIB Scotland Response to the Scottish Parliament’s Finance and Public Administration Committee call for views on the Financial Memorandum of the Scottish Elections (Representation and Reform) Bill

### 1. Name of organisation

RNIB Scotland - Royal National Institute of Blind People Scotland

### 2. Information about your organisation

RNIB Scotland works on behalf of and with blind and partially sighted people to create a fairer world for people with sight loss. RNIB estimates that around 183,000 people live with a significant degree of sight loss in Scotland.

We seek to advance the interests of visually impaired people in Scotland across devolved policy areas including transport, active travel, public realm design, health and social care, education, and social security, as well as accessible voting.

The right to vote independently, and in secret, is a cornerstone of our democracy. Yet over 150 years after the 1872 Ballot Act - which guaranteed the right to vote in secret - people with sight loss still face unacceptable barriers to exercising their democratic right to vote. RNIB’s Turned Out 2022 report on the May 2022 elections around the UK found that only one in five blind and partially sighted people felt they could exercise their right to vote both in confidence and with confidence.

We welcome the opportunity to respond to this Call for Views on the Financial Memorandum of the Scottish Elections (Representation and Reform) Bill. Please note that we have made a fuller response to the Scottish Parliament Standards, Procedures and Public Appointments Committee Call for Views on the Scottish Elections (Representation and Reform) Bill.

## Call for Views

### 1. Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?

RNIB Scotland responded to the Scottish Government Consultation on Electoral Reform in March 2023. We did not comment on the financial assumptions made in 2023 but are committed to finding workable accessible voting solutions.

### 2. If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?

Not applicable.

### 3. Did you have sufficient time to contribute to the consultation exercise?

Yes.

### 4. If the Bill has any financial implications for you or your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details.

Not applicable.

### 5. Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?

RNIB Scotland strongly supports the development of new accessible voting aids and their testing and piloting and having them available for the next set of elections within the responsibility of the Scottish Government, that is, the Scottish Parliament elections (2026) and Scottish local government elections (2027).

The references to electoral innovation and pilots of a new tactile or audio voting aid are encouraging. However, the Financial Memorandum notes that the power to hold election pilots has rarely been used and that "at present the changes made by the Bill will not directly result in the additional cost identified below".

The Memo goes on to note costs as below:

"The scale of costs would depend on the nature of the pilot but could be in the range £50,000 for a small pilot of e.g., electronic poll cards or for a ballot paper overlay to assist persons with sight loss. Modest additional costs, proportionate to the scale and scope of a pilot and likely to be less than £20,000, may be incurred by the Scottish Government for the purchase or licence and subsequent testing of voting aids; for training of administrators; and for publicity and communication with electors. … Formal Electoral Commission assessment of a pilot could also be required, and this could cost around £100,000. No pilots under this legislation are currently planned."

We cannot comment on whether the proposed funding is sufficient, but RNIB Scotland is concerned that no pilots are currently being planned "under this legislation". However, we are aware of the framework nature of the Bill as introduced and the Financial Memorandum sets out that: "Secondary legislation (‘no procedure’) will be required where a pilot is proposed."

RNIB Scotland has been working with the Scottish Government and Scottish sight loss organisations to test potential accessible voting solutions for blind and partially sighted voters. These have included alternatives to the current Tactile Voting Device (TVD) such as perforated ballot papers and a new card ballot paper overlay developed by the Scottish Government Elections Team. We have also tested an audio device that can be taken into the ballot box with a headset. This allows individuals to listen to the candidates’ names and cast their votes independently using the TVD, with no need for another person to be present. We also welcome the Scottish Government's readiness to explore the use of phone helplines to identify who is on a given ballot paper.

We are keen and ready to work with the Scottish Government Elections Team, the Electoral Management Board for Scotland, and the Electoral Commission to develop feasible accessible voting aids for blind and partially sighted voters. Election pilots will play a critical role in arriving at a better solution.

### 6. If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?

Not applicable.

### 7. Does the FM accurately reflect the margins of uncertainty associated with the Bill’s estimated costs and with the timescales over which they would be expected to arise?

The FM reflects uncertainty associated with the Bill’s estimated costs and with the timescales over which they would be expected to arise.

Over 150 years since the passage of the Secret Ballot Act 1872, RNIB Scotland hopes to see the development of feasible accessible voting aids in time for the next Scottish elections to enable blind and partially sighted voters to vote in confidence with confidence for their chosen candidates.