

Mind the gap

An analysis of EU citizens' political participation and representation in the UK

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SUMMARY

The rights of EU citizens to vote and stand in the UK 2021 local elections have been confirmed. Yet there is limited knowledge on EU citizens' political participation and representation patterns in the UK.

This report combines different population and election data to explore the participation gap of EU citizens in the UK. It shows how EU citizens' participation varies across regions and identifies areas where the participation gap is likely to be most pronounced. The research also provides some insight into the political representation of EU citizens at the local level.

This report gives recommendations for a more inclusive UK democracy, including:

- Recommendations for data collection efforts and researchers on how to conduct more comprehensive research on EU citizens' political participation and representation;
- Recommendations for democratic rights campaigners on how to effectively engage with EU citizens for targeted voter mobilisation campaigns and increasing political representation of this group in UK politics;
- Recommendations for political stakeholders to launch an inquiry on EU citizens' political participation and representation in UK politics and provide clarity on EU citizens' democratic rights after 2021.

Research context

Following the UK's EU referendum in 2016, the democratic rights⁽¹⁾ of EU citizens who live in the UK have been under negotiation. EU citizens could vote and stand in UK local and municipal elections, but could not vote in national elections and referendums. Only British⁽²⁾, Irish and qualifying Commonwealth citizens⁽³⁾ can vote in national elections. Although the local-level democratic rights of EU citizens in the UK have been confirmed for the 2021 local elections⁽⁴⁾, bilateral negotiations with each EU member state are being carried out to decide the continuation of these rights after 2021. As of September 2020, the UK reached agreements with Spain, Portugal, Luxembourg and, most recently, Poland⁽⁵⁾.

In this context, the3million has been campaigning on preserving EU citizens' democratic rights in the UK and expanding them to all residents. the3million has advocated levelling up these rights under the

principle that all residents should have a say in their local communities⁽⁶⁾. This campaign started in 2017 with the aim to avoid unfair situations where two EU citizen neighbours in the UK would have different voting rights because they are citizens of different member states. the3million has also worked closely with British in Europe, an organisation campaigning to secure guarantees on the democratic rights of British citizens living in EU member states.

Democratic rights tend to be overlooked in migrants' rights campaigning in the UK. This is often explained in anecdotal insights by a perceived lower interest in this issue, compared to other citizens' rights aspects. A key barrier to participation, and the most prominent one identified by the3million's recent consultation on EU citizens' political rights, is the limited or inaccessible information on EU citizens' democratic rights⁽⁷⁾. While there has been research

(1) This report uses the term 'democratic rights' to include the right to vote and the right to stand in elections.

(2) British citizens who have been living outside the UK for more than 15 years lose their rights to vote in UK elections.

(3) A Commonwealth citizen, including those of British Crown dependencies and British overseas territories, who has leave to enter or remain in the UK or does not require such leave. More information on voter eligibility can be found at: <https://www.electoralcommission.org.uk/i-am-a/voter/register-vote-and-update-your-details#commonwealth>

(4) EU citizens' voting rights were confirmed for the 2021 local elections.

See: <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2020-06-29/66206/>

(5) the3million's consultation report on EU citizens' political rights in the UK, published in August 2020, includes more detail about the UK's bilateral approach to these negotiations: http://www.t3m.org.uk/t3m_EEF_consultation
the3million's briefing on voting rights details on the different systems of organising democratic rights in a country – the citizenship and residency principles: <http://t3m.org.uk/LocalVotingRights>

(6) See the3million's voting rights campaign page: <https://www.the3million.org.uk/let-us-vote-campaign>

(7) Read the3million's report here: http://www.t3m.org.uk/t3m_EEF_consultation

Also, see: Greater London Authority (2020). London Voter Registration Week 2019: Evaluation Report. February 2020.

Online at: <https://registertovote.london/evaluation-report/>

(8) A 2016 Electoral Commission report found that only 53% of EU citizens registered to vote, compared to 63% of Commonwealth citizens and 86% of British and Irish citizens. See: Electoral Commission (2016). The December 2015 electoral registers in Great Britain: Accuracy and completeness of the registers in Great Britain and the transition to Individual Electoral Registration.

Online at: www.electoralcommission.org.uk/sites/default/files/pdf_file/The-December-2015-electoral-registers-in-Great-Britain-REPORT.pdf

(9) See, for instance: Bite the Ballot, Toby James and ClearView Research (2016). Getting the 'missing millions' on to the electoral register: a vision for voter registration reform in the UK. APPG on Democratic Participation.

Online at: https://tobysjamesdotcom.files.wordpress.com/2013/11/getting-the-e28098missing-millions_-on-to-the-electoral-register-report-appgon-democratic-participation-bite-the-ballot-dr-toby-james-clearview-research-2016-1.pdf



indicating that EU citizens are the least likely group to register in UK local elections⁽⁸⁾ and various studies highlighting barriers to political participation⁽⁹⁾, there has been no systematic research exploring the political representation and participation of EU citizens across the UK.

Campaign strategies aiming to increase the political participation and representation of EU citizens need to be evidence-based to improve their effectiveness, yet this evidence base on this issue is very limited. Compared to other aspects of citizens' rights campaigning, such as the EU Settlement Scheme, there

are no easily available data toolkits for campaigners in the migration sector to use in planning their work on democratic rights. Consequently, a research project addressing this gap was proposed to the Joseph Rowntree Reform Trust (JRRT). This report, funded by the JRRT, is part of a dissemination package, also including a data toolkit hosted on the3million's website, a report summary and a dissemination event bringing academic and migration sector researchers together to discuss recommendations on research on EU citizens' democratic rights, with a view of informing campaign strategies in the third sector.

Data collection

Our research asks the following: what do we know about EU citizens' political participation and representation in the UK and what do we need to know? We focus on England in this study, not least considering that EU citizens' democratic rights operate differently in Scotland and Wales, given that all residents can vote in local elections, regardless of their nationality, in these two nations.

Data on EU citizens' political participation

We compiled data from various sources to investigate the **political participation** of EU citizens in England:

- **EU citizens' Population Shares**

These data are available from the Office for National Statistics (ONS)⁽¹⁰⁾. We used the most recent version (January to December 2019, released in May 2020), which is based on the Annual Population Survey. These data provide local-level estimates by both country of birth and nationality, further breaking the migrant population down by region of origin (e.g. EU-14). Considering that one's nationality determines voting rights and some EU-born individuals are naturalised British citizens, we use the estimates based on nationality⁽¹¹⁾.

- **EU Voter Registration**

These data are also available from the ONS⁽¹²⁾ and are accurate for December 2019 (released in May 2020). The number of registered EU citizens in this data excludes Irish, Cypriot and Maltese citizens.

- **Settled Status Applications⁽¹³⁾**

This is provided by the Home Office⁽¹⁴⁾. We use the latest release of the quarterly statistics (March 2020) for local authority level data.

- **Local Authority Election Results**

Data for the years 2015 to 2018 are provided by The Elections Centre⁽¹⁵⁾.

- **Local Authority Election Results for 2019**

This is an amalgamation of sources. In authorities where all seats were up for election, the results can be found in the House of Commons Library⁽¹⁶⁾ report. Wherever only part of the council was up for election, we manually researched and entered results into our data set; in this process, we used data from the Local Elections Archive Project⁽¹⁷⁾ and council level press releases.



(10) Source: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/datasets/populationoftheunitedkingdombycountryofbirthandnationality>

(11) Like the ONS and other publications using this data, we utilise the terms 'national' and 'citizen' interchangeably from this point forward. When choosing our data set we could opt for "EU-born" or "EU national" classifications. Both of these are not necessarily equivalent to "EU citizen". EU-born individuals can be naturalised as UK citizens and UK-born EU nationals could possibly be UK citizens. More generally, nationality is self-reported, and may not match a person's legal citizenship. For example, some people may not understand their citizenship status. UK-born children of recent EU immigrants are not necessarily UK citizens, as this depends on their parents' immigration status. As noted by the Migration Observatory "a comparison of data for England and Wales suggests that the APS estimate of the number of EU nationals in 2011 was approximately 180,000 or 8% lower than the number of passport holders captured in the Census". Hence, we believe it to be a reasonable assumption that the APS estimate based on nationality is an adequate gauge for citizenship.

(12) <https://www.ons.gov.uk/peoplepopulationandcommunity/elections/electoralregistration/datasets/overseasanonymousvotersoptedoutandparliamentarybylocalauthority>

(13) This includes both pre-settled and settled status applications. For brevity, this report refers to both types of applications as 'settled status'.

(14) Source: <https://www.gov.uk/government/statistics/eu-settlement-scheme-quarterly-statistics-march-2020>

(15) Source: http://www.electionscentre.co.uk/?page_id=3755

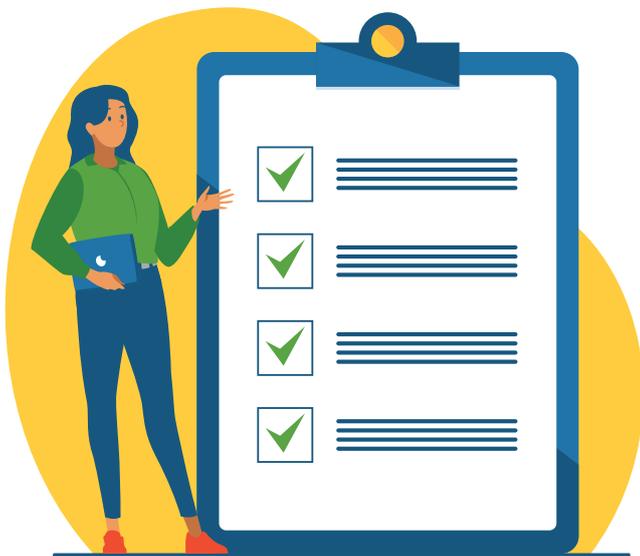
(16) Source: <https://commonslibrary.parliament.uk/research-briefings/cbp-8566/>

(17) Source: <http://www.andrewteale.me.uk/leap/>



Data harmonisation

The combination of election data from years prior to 2019 and the other data sets requires harmonisation of different Local Authority District (LAD) classifications, which are adjusted annually. To illustrate, the unitary authority of Christchurch, Bournemouth and Poole was created from its three constituent parts in April 2019. In our data sets on settled status applications and voter registration, we have data at the level of the 2019 LAD. However, our population share and local election data (by their very nature) use older LAD classifications. Therefore, we have the share of EU citizens as well as previous election results at the individual level for the unitary authorities of Bournemouth and Poole, and the non-metropolitan district of Christchurch. Data harmonisation implied matching LAD classifications for 2018 to those of 2019. For calculations using population shares, we added the shares of individual authorities that merged into one single authority in the 2019 classification. More precisely, this is the case for Dorset, East Suffolk, West Suffolk, Somerset and West Taunton and the already mentioned Christchurch, Bournemouth and Poole. If data on the EU citizen population was missing for a constituent authority, we replaced the value for the overall authority as missing. To analyse election results prior to 2019, we have contained the 2018 LAD identifier in the data. Effectively, our data constitute a panel data set of local authorities and election results, with population shares, electoral registration and settled status data held fixed at values for 2019. Of the 343 local authorities overall, 317 are included in our data set; we exclude the 26 county councils⁽¹⁸⁾.



We provide our underlying data set on the3million's website. However, caution needs to be exercised when using it, because it contains variables from different data sets, which may differently count EU citizens (e.g. population versus registration shares). Furthermore, we are combining administrative data (voter registration, settled status and election data) with estimated population shares from the Annual Population Survey. Therefore, we recommend that anyone making use of our data set also familiarise themselves with the data documentation of the source data sets, as outlined above. Comparing variables across different data sets can open the door to potential pitfalls, unclear interpretation if caution is not exercised and could even be impossible altogether.

EU citizens' voter turnout

In addition to these data, we attempted to gather information on: 1. voter turnout amongst EU citizens and 2. the number of councillors with an EU citizen background. We found that none of this information is centrally or de-centrally collected.

On **EU citizens' voter turnout**, there are essentially three ways we could attempt data collection:

- A** Go through electoral registers identifying all individuals that are known to be EU citizens through voter codes, then examine the marked register after each election to see whether they had voted or not. This would be a huge undertaking, even for a sample of wards. In any modelling, we would also have to control for voters' demographics. Data protection and confidentiality could further complicate this matter.
- B** Local authorities might already have accurate data on the aggregate number of EU citizens on each ward register. This would allow us to identify the percentage of EU citizens in each ward. We could then examine variations in turnout across wards and extrapolate. However, this commits an ecological fallacy. We would have to assume that EU voters are exactly as likely to turn out to vote as natives, but that is precisely what we want to investigate.
- C** Conduct a ward-level survey of electors from the registers. Once again, this would be very time consuming and probably would not allow for the extrapolation we are aiming for.



(18) For the 2021 elections there will only be 24 county councils.



Data on EU citizens' political representation

We wanted to explore not only the political participation of EU citizens, but also their representation. To this end, it would be of significant interest to see how many local authority councillors have an EU citizen background. A large strand of the political sociology literature has debated whether descriptive representation is necessary for substantive representation⁽¹⁹⁾. In other words, does it take EU citizen councillors to substantively represent the views and needs of EU citizens in the political forum? Whether one subscribes to the idea that substantive requires descriptive representation or not, we would probabilistically expect areas with a large EU citizen population to field at least some EU citizen councillors.

However, much like in the case of turnout, data isn't readily available on this. Sobolewska and Begum (2020)⁽²⁰⁾ investigated the representation of ethnic minorities in UK local government. They traced ethnicity based on councillors' pictures and names and found that only 7% were of an ethnic minority background. This was a very time consuming undertaking and due to the focus on BAME groups, no information on EU citizenship was collected. Furthermore, citizenship is a concept that is much harder to observe than ethnicity and must be self-declared by the councillors. In a first effort to extend their analysis to EU citizens, we contacted the councils and council leaders of the ten local authorities with the highest EU national shares in their population. The insights on this are included in the next section of this report.



Data analysis

Mapping EU citizens in England

In order to analyse the participation of EU citizens at the local level, we first of all document where in England they predominantly reside. **FIGURE 1** provides a heat map of the population of EU citizens, broken down by local authority (2019 classification). It is immediately obvious that they are concentrated in the Greater London area; the further we move away from London, the smaller the population shares tend to become. Yet, there is a noticeable belt of local authorities predominantly to the North of London, where EU citizens also constitute larger shares of the local population.

EU citizen voter registration in England

The first step to participation in the electoral process is that of voter registration. Whilst individuals may be eligible to vote, this does not mean that they actually register and then take the further step to turn out to vote. **FIGURE 2** graphs the variation of EU citizen share on the local register across local authorities. As we would expect, the heat map looks remarkably similar to that provided in **FIGURE 1**. We can also see that there are fewer local authorities where data points are missing, which is due to the administrative nature of electoral register data. To get a more precise idea of where EU citizens predominantly reside and are registered to vote, we list the ten local authorities with the highest shares (**TABLE 1**).



(19) see e.g. Wolbrecht, C., Campbell, D.E., 2007. Leading by Example: Female Members of Parliament as Political Role Models. *American Journal of Political Science* 51, 921–939. or Childs, S., 2016. The Complicated Relationship between Sex, Gender and the Substantive Representation of Women: *European Journal of Women's Studies*. <https://doi.org/10.1177/1350506806060003>
(20) <http://documents.manchester.ac.uk/display.aspx?DocID=49921>

FIGURE 1

Population Shares of EU Nationals, by Local Authority

Source
Own analysis of ONS Population by Country of Birth and Nationality data, January to December 2019, Table 2.1

% EU NATIONALS

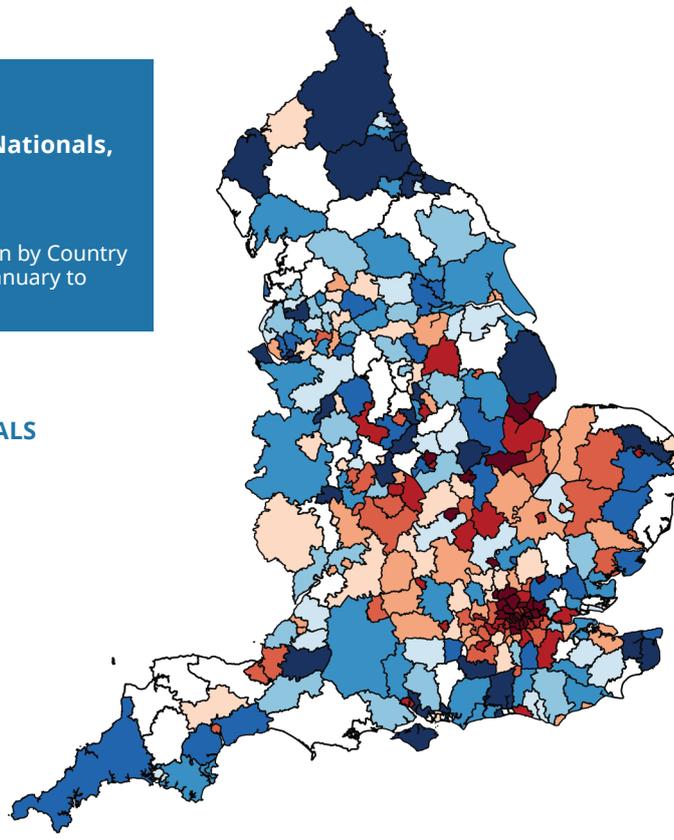
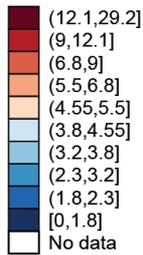


FIGURE 2

Shares of EU Citizens in Local Electoral Register, by Local Authority

Source
Own analysis of ONS Electoral Registrations by Local Authorities data, December 2019, Table 7

% OF LOCAL ELECTORS

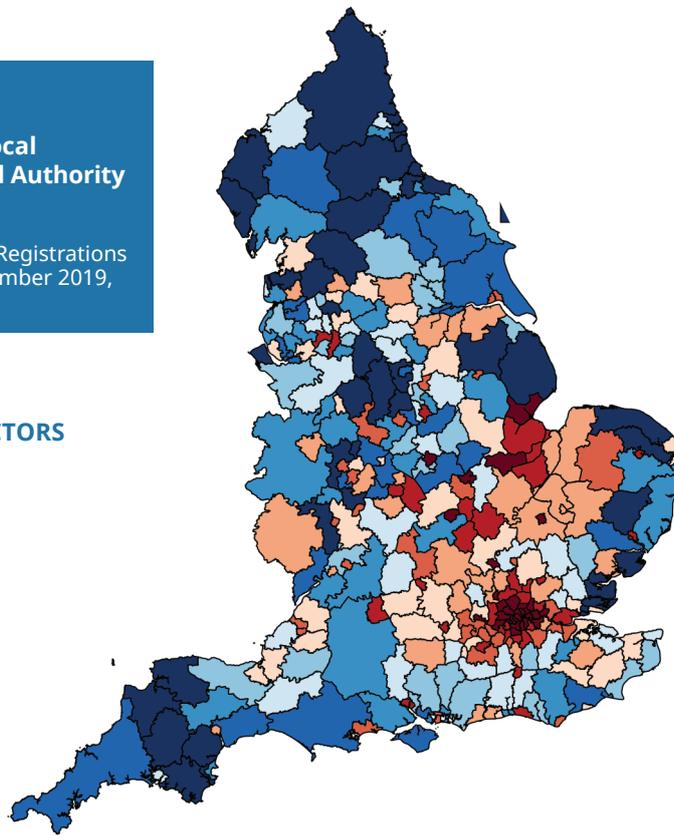
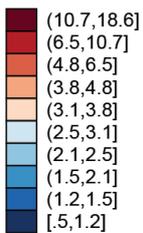


TABLE 1 Local Authorities by EU % in Population and Electorate

Local Authority	Estimated Population Share of EU nationals (in %)	Local Authority	Electoral Register Share of EU citizens (in %)
Corby	29.2	Brent	18.6
Boston	20.6	Newham	17.4
Brent	20	Kensington and Chelsea	17.3
Kensington and Chelsea	19.5	Ealing	16.1
Haringey	19	Boston	15.6
Harrow	17.6	Hounslow	15.4
Westminster	17.4	Westminster	15.3
Newham	17.3	Hammersmith and Fulham	15.2
Leicester	16.9	Haringey	14.6
Peterborough	16.4	Barking and Dagenham	14.5

Source

Own analysis of ONS Population by Country of Birth and Nationality (January to December 2019, Table 2.1) as well as ONS Electoral Registrations by Local Authorities data (December 2019, Table 7).

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The local authority in England with the largest EU citizen share is Corby in Northamptonshire⁽²¹⁾. It appears intuitively surprising that despite being by far the largest local authority for EU citizen share, Corby does not even feature in the top ten for electoral share. In fact, the share of EU citizens on the local electoral register is 14.2%, less than half the percentage point share EU citizens make up in the local population. Even if the population

of EU citizens is significantly overestimated, the differential between the two share measures for Corby is rather striking. With regards to the share of EU citizens on the local electoral register, it is eye-catching that, bar Boston, all local authorities in the top ten are Greater London Boroughs. Taking England as a whole, 5.8% of the population are EU citizens whilst 4.9% of those registered to vote are EU citizens.

(21) For an in-depth analysis on migration patterns in Corby, see Murray, C. and Griffith, P. (2018). Local migration panel: Corby. Institute for Public Policy Research. Online at: <https://www.ippr.org/files/2018-08/imp-corby-august18.pdf>



Intuitively, this table seems to suggest a disjoint between the two share measures. The shares of EU citizens on the electoral register in many authorities are significantly smaller, even in the local authorities where their population shares are amongst the highest in the country (e.g. Boston, Brent, Kensington and Chelsea, Haringey and Westminster). This is very surprising, as we would a priori expect the EU share in the local electorate to be larger than that in the population. This is due to the fact that the pool of those eligible to vote is a subset of the entire population. Only British, Irish, Commonwealth or EU citizens over the age of 18 years on polling day are eligible to vote in English local elections. Other non-native individuals cannot register to vote. Let's assume that there is no difference in the propensity to register between natives, EU and Commonwealth citizens. If there are at least some ineligible non-native individuals in the population, then:

1 The share of EU citizens in the electorate should be proportional to as well as mechanically larger than their share in the population.

One factor which calls (1) into question is that Irish, Maltese and Cypriot citizens are counted as European in the population, but not the electoral register data. This mechanically reduces the EU share on the register relative to that in the population. However, as long as there are substantially more non-native, non-eligible individuals in the rest of the population than there are Irish, Maltese or Cypriot citizens, expectation (1) is still valid as the EU population share is sufficiently diluted⁽²²⁾. This is further reinforced by possible estimation error in our population data. More generally, caution needs to be exercised and the confidence intervals provided alongside the data estimates should be taken into account; particularly at the local level where there is typically greater uncertainty. Furthermore, previous reports by other organisations on this issue have suggested that estimation could constitute a particular downward bias on the number of EU citizens, i.e. the estimated is lower than the true value, but it is not possible to say by how much⁽²³⁾. This is because the ONS only counts those living at private addresses (e.g. those residing in student halls are excluded) and is likely to undercount new arrivals or people with

both EU and non-EU citizenships. On the other hand, electoral register shares constitute administrative data and do not suffer from estimation bias. The implication is that:

2 If the EU citizen population is underestimated, this would further widen the amount by which its share in the total population is smaller than the EU citizen share on the electoral register.

A further complication to our analysis is that we do not observe demographic characteristics. For example, it may also be that disproportionately many EU citizens are below 18 years old and thus not eligible to vote. This would mean that we are falsely expecting relatively more EU citizens to be eligible to register to vote than actually are. Yet, this has not been previously noted as a source of substantial bias. Immigrants do tend to be younger, but there are far fewer 'immigrant children' relative to the migrant population than there are native children relative to native populations⁽²⁴⁾. Therefore, even if there are such demographic differentials, it is reasonable to assume that this would not cause substantial bias.

Overall, this suggests that we ought to expect the share of EU citizens on the electoral register to be larger than the share in the total population. If certain local authorities were to exhibit the opposite case, this would at least give an indication about relative propensities to register to vote. It may be the case that individuals eligible to vote at the local level do not choose to register or are unaware of the possibility to do so.

3 If EU citizens are affected by this phenomenon disproportionately more than other groups, we would expect their share in the electorate to fall relative to their share in the population.

We explored this issue using a simple percentage point difference measure between the population share and the electoral register share. Positive values indicate that the share of EU citizens in the population is greater than in the electorate, negative values the opposite. A priori, we would expect negative values, as the EU citizen share in the local electorate is likely to be mechanically higher than that in the local population (1). For positive values to occur, the number



(22) Based on estimates of non-British population groups for the United Kingdom as a whole, we believe this to be a reasonable assumption for England as well. If we had access to estimates of the Irish, Maltese and Cypriot population at a local level, we would directly correct for this; unfortunately, such data is not available. We apply the same assumption with regards to the fact that overseas electors are not accounted for in the population data.

(23) See, for example, Sumption, M. (2020) 'Not Settled Yet? Understanding the EU Settlement Scheme using the Available Data'. Migration Observatory Report, COMPAS, University of Oxford, UK.

(24) See, for example, Markaki, Y. (2015). 'Demographics of Young Migrants in the UK.' Migration Observatory Briefing, COMPAS, University of Oxford.



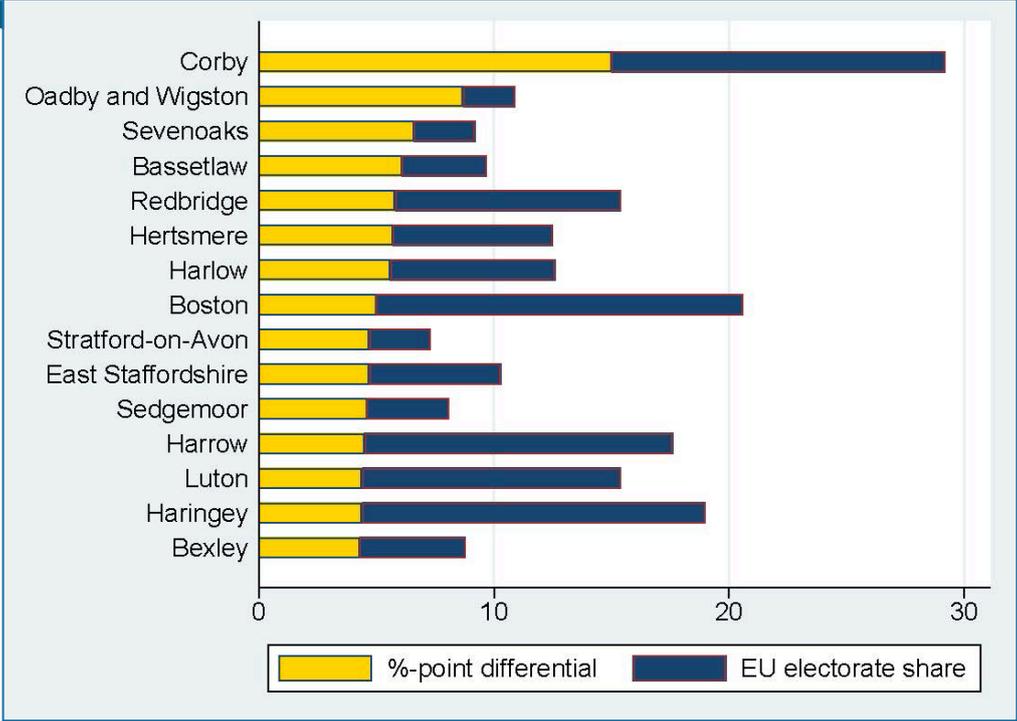
of EU citizens who register would need to be driven down substantially relative to other groups. Because we do not control for demographic characteristics, we cannot safely attribute any positive values to differing political participation (3) alone. However, under the assumption that demographic differentials aren't substantive enough to overcome (1) on their own, substantial, positive values are at least indicative of a participation gap between EU citizens and other groups eligible to register to vote.

Furthermore, our figures may constitute a lower bound due to (2), i.e. the true value of the difference may be even larger than what we observe. This would

mean that positive values may in reality also be larger, further suggesting the idea of a participation gap. It is important here to stress again that the precise magnitude of the %-point differential does **not** have a direct interpretation. What we exploit here is merely the fact that large, positive values are not to be expected if EU citizens register to vote in similar numbers as other groups. Due to the caveats about the comparison of the two measures discussed, we do not think that smaller positive values give straightforward insights either. Therefore, we restrict our attention to only those local authorities where the differentials are positive and large.



FIGURE 3
Local Authorities with the largest %-point Differences
Source
Own analysis of ONS Population by Country of Birth and Nationality (January to December 2019, Table 2.1) as well as ONS Electoral Registrations by Local Authorities data (December 2019, Table 7).





The EU citizen mobilisation gap

When we examine these local authorities more closely, an interesting picture emerges (FIGURE 3). Together the %-point gap and the EU electoral share bars constitute the %-point share in the local population. It is surprising that there appears to be no clear trend in how the gap and EU population share covary; there are areas with some of the largest EU population shares (e.g. Corby, Boston and Haringey) as well as those with moderate shares (e.g. Stratford-on-Avon). What is noticeable is that most of these local authorities (bar Redbridge) lie outside of Greater London. We see Harrow, Luton, Haringey and Bexley only towards the bottom of the list. On the other hand, we find Corby at the top of the table. As already stated, even if the share of EU citizens in Corby is significantly

overestimated, this would likely still leave a substantial differential ajar⁽²⁵⁾. Corby has already been the focus of past research reports on immigration, further underlining its role as a fascinating case study for the migration sector in the UK⁽²⁶⁾. If we focus exclusively on the top ten constituencies (see TABLE 2), most of them lie in the aforementioned belt above and around London. These are areas where a significant share of the population is made up of EU citizens; all sit above the overall share of EU citizens in England of 5.8%. However, it appears that EU citizens do not make up similar shares of the electoral register. Arguably, the most concerning differences are those in areas where the EU population share is lower overall, as this would suggest that a larger share of the local EU population does not even register to participate in local democracy.



TABLE 2 Local Authorities with largest %-point Gaps

Local Authority	%-share of EU citizens on electoral register	Estimated %-share of EU nationals in local population
Corby	14.2	29.2
Oadby and Wigston	2.2	10.9
Sevenoaks	2.6	9.2
Bassetlaw	3.6	9.7
Redbridge	9.6	15.4
Hertsmere	6.8	12.5
Harlow	7.0	12.6
Boston	15.6	20.6
Stratford-on-Avon	2.6	7.3
East Staffordshire	5.6	10.3

Source

Own analysis of ONS Population by Country of Birth and Nationality (January to December 2019, Table 2.1) as well as ONS Electoral Registrations by Local Authorities data (December 2019, Table 7).

(25) Even if we use the lower bound of the confidence interval around the population estimate for Corby, this percentage point gap is still positive.

(26) See Murray C. and Griffith P. (2018) Local migration panel: Corby, IPPR. Online at: <http://www.ippr.org/publications/local-migration-panel-corby>



Out of the ten local authorities where we found the largest share differentials, eight had local elections in 2019 and one in 2018 (Redbridge). Only Corby has an election in 2021, now part of North Northamptonshire unitary authority. One possible explanation for the lower registration figures amongst EU citizens could be that this is an anticipatory effect of EU citizens' democratic rights changing after 2021. If there is no local election until after this cut-off, some may decide that registering may not be worth it. However, seeing as eight of the local authorities had elections in May 2019 and our electoral register data is a snapshot from December 2019, we believe this effect to be of minor explanatory power. Of course, we are assuming that individuals did not de-register after the May elections. Furthermore, all county councils are up for election in 2021, giving EU citizens another opportunity to participate politically.

Our results are consistent with previous research regarding the probability of different groups to register to vote⁽²⁷⁾. In fact, to investigate this issue more directly, we would ideally also have liked to compare the percentage of EU citizens registered to vote to the share amongst other, eligible groups. This would indicate more clearly whether the probability for an EU citizen to register to vote was lower than that for other groups. Unfortunately, we do not observe the precise, total number of UK and Commonwealth nationals at the local authority level. Hence, we cannot directly calculate the probability to register to vote for these eligible groups other than EU citizens. Overseas electors further complicate the matter. Neither is there a viable option to identify this measure for EU citizens. This is due to the differing classification of Irish, Maltese and Cypriot citizens across the population and electoral register data set. We would effectively be calculating the ratio of the number of registered EU citizen voters (which excludes Irish, Cypriot and Maltese) and the EU population estimate (which includes Irish, Cypriot and Maltese). Because of the pitfalls of creating a measure that incorporates data points from two data sets that use different methodologies of classification, we decided against including such a measure.

The EU Settlement Scheme – a case of information failure?

Outreach in EU citizen communities at the local level and encouraging them to apply to the EU Settlement Scheme should further be included as a form of mobilisation. Thus, in addition to electoral registration data, we also examined the number of settled status applications made in any local authority. Naturally, we wanted to benchmark these figures against the estimated number of EU residents. However, this is problematic as the estimated population does not cover certain individuals eligible to apply and likely underestimates the number of EU citizens⁽²⁸⁾. Therefore, we cannot provide any reliable analysis on the share of EU residents that have already applied and/or been successful. Yet, a back-of-the-envelope calculation suggests that in certain areas significantly over 100% of EU residents have already applied, which is physically impossible. This may be down to double-counting of applications by the Home Office⁽²⁹⁾ (albeit being only a small share if increasing over time) or the fact that the ONS population estimates do not count all eligible EU citizens. Furthermore, EEA citizens and non-EU family members of EU citizens are also eligible for the EU Settlement Scheme. Once again, we must place hope on the 2021 census to fill these data gaps so that we can better understand the descriptives and investigate causal links.

TABLE 3 provides an overview of the local authorities with the highest numbers of settled status applications, as well as their estimated EU citizen population. We did also investigate the local authorities with the fewest applications, but these predominantly either have very small EU citizen populations or data are missing. Furthermore, **FIGURE 4** illustrates settled status applications across England using a heat map.

Again, most of those in the top ten are in the Boroughs of Greater London, with the exception of Birmingham, Leicester and Manchester. The heat map draws a similar picture, with a red cluster in Greater London.



(27) See Electoral Commission (2016). The December 2015 electoral registers in Great Britain: Accuracy and completeness of the registers in Great Britain and the transition to Individual Electoral Registration.

Online at: www.electoralcommission.org.uk/sites/default/files/pdf_file/The-December-2015-electoral-registers-in-Great-Britain-REPORT.pdf

(28) See Sumption, M. (2020) 'Not Settled Yet? Understanding the EU Settlement Scheme using the Available Data'. Migration Observatory Report, COMPAS, University of Oxford.

(29) See ONS (2020). Note on the difference between ONS population estimates by nationality and Home Office European Union Settlement Scheme (EUSS).

Online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/articles/noteonthedifferencebetweenonspopulationestimatesbynationalityandhomeofficeeuropeanunionsettlementschemeussstatistics/2020-02-24>

TABLE 3 Local Authorities by Settled Status Applications in 1000s

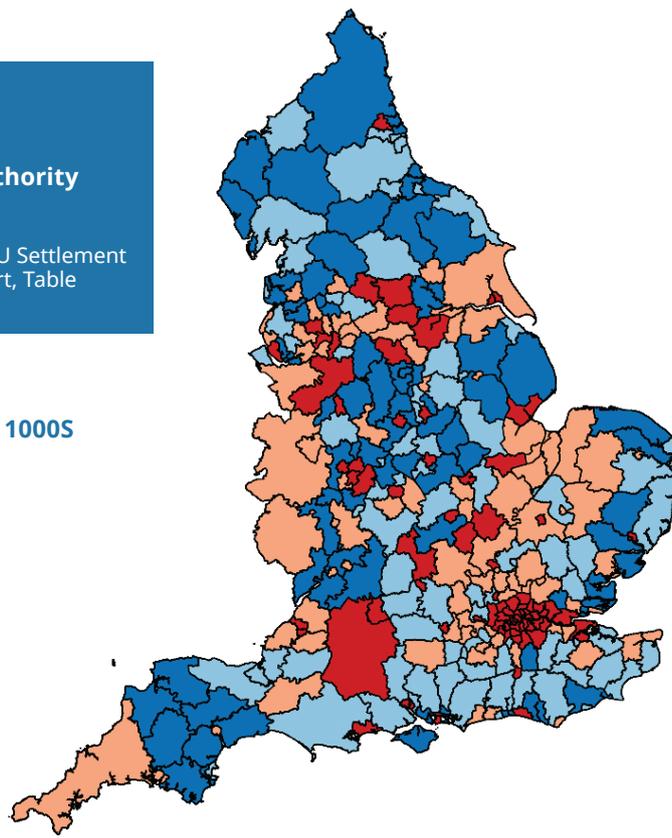
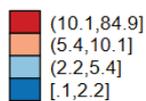
Local Authority	Applications in 1000s	Estimated EU Nationals in 1000s
Newham	84.9	62
Brent	79.7	66
Birmingham	71.8	83
Ealing	66.3	43
Haringey	57.1	53
Leicester	55.9	60
Barnet	54.3	58
Manchester	51.8	37
Hounslow	51.6	29
Tower Hamlets	50.2	39

Source
Own analysis of ONS Population by Country of Birth and Nationality (January to December 2019, Table 2.1) as well as Home Office EU Settlement Scheme Statistics (March Report, Table EU_SS_LA_01).

FIGURE 4
Number of Settled Status Applications, by Local Authority

Source
Own analysis of Home Office EU Settlement Scheme Statistics (March Report, Table EU_SS_LA_01).

APPLICATIONS IN 1000S





A Note on EU citizen local councillors

Finally, running for and taking public office also constitutes important political participation. Furthermore, there is the issue we touched on, of whether substantive requires descriptive representation. In other words, do EU citizen issues require EU citizen councillors for accurate representation? To this end, we reached out to the ten local authorities with the highest EU citizen share (TABLE 1). This yielded varying degrees of success, with a mix of non-responses and fruitless Freedom of Information requests. The only council who was able to provide the number of EU citizen councillors was Boston, the local authority with the second largest

share of EU citizens in England. In this local authority, none of the thirty councillors were EU citizens. If this is the case in other local authorities, this would indeed be a very extreme result.

Overall, our analysis shows that there is considerable variation in the voter registration of EU citizens across English local authorities. Furthermore, our analysis of differentials between EU citizen population and electoral register shares suggests that EU citizens appear less likely to register to vote than other eligible groups in certain local authorities. This has important implications for campaigners and political actors seeking to increase participation of EU citizens, as well as more broadly on EU citizen integration.

Recommendations for a more inclusive UK democracy

This research represents a first step contributing towards closing the mobilisation gap that we observe in the case of EU citizens' political participation and representation in the UK. The research was conducted in one month, thus a longer-term research project could explore some of our findings in much more detail. In particular, collecting data on EU citizens' representation in local councils would involve significantly more time and resources to be able to return satisfactory results. Based on the data analysis in this report and additional qualitative insight collected by the3million through conversations with local council representatives and other stakeholders in the migration sector, we make a series of recommendations.

1 Recommendations for data collection and research

- To facilitate research and evaluation of the representation of EU citizens in UK politics, we recommend collecting data on local councillors of EU citizen background in future local election waves.
- For a more detailed picture of EU citizens' political participation, we recommend implementing data collection efforts for EU citizens' turnout in future local elections.
- For data collection on both representation and participation, we recommend collecting a comprehensive data set for all or at least an appropriate sample of local authorities in the UK.
- Data on political participation and representation of EU citizens, both current and future, should be

made easily accessible online to enable civil society organisations and citizens to make use of such data.

- This report shows there is indicative evidence of a participation gap amongst EU citizens, especially outside London; yet, based on the available data, we cannot conclude precisely how large this gap actually is or what the causal mechanisms driving it are. Until comprehensive data are collected, we recommend researchers carry out qualitative research (e.g. focus groups) with EU voters in the areas with a large mobilisation gap.
- Future research should explore the links between political participation and representation, as well as descriptive and substantive representation, once reliable data on these aspects are available. With the data currently available, it is not possible to assess whether representation stimulates participation or vice-versa in the case of EU citizens in the UK.

2 Recommendations for democratic rights campaigners

- We recommend that all campaigners focus on raising awareness and outreach on democratic rights, alongside their policy and advocacy work.
- For campaigners running EU citizen mobilisation campaigns with the aim to increase voter turnout, we recommend targeting the areas we identified as most likely to have a participation gap, predominantly outside Greater London. For instance, Corby appears to represent an ideal setting to evaluate EU voter mobilisation strategies. The data





toolkit accompanying this report provides further information on the EU citizen mobilisation gap we describe in the report.

- For campaigners focussing on increasing the political representation of EU citizens in UK politics, we recommend targeting the areas with the highest EU citizen population share, to be able to effectively point out discrepancies between the share of the EU citizen population and the corresponding share of EU citizen local politicians (once this data becomes available, or through own further local-level research).

3 Recommendations for political stakeholders

- We recommend political stakeholders at both national and local level launch an inquiry into EU citizens' political participation and representation in

UK politics. Such an activity could attract evidence submissions that would offer some qualitative insight from local authorities, civil society organisations and local residents on these issues.

- We invite all UK political parties to engage with the findings of the report and to review their strategies on EU citizen voter turnout in the 2021 elections, as well as to implement mechanisms to increase the representation of EU citizens, particularly in areas with large EU citizen communities.
- As the franchise is the first step to political participation, to improve on EU citizens' political participation and to avoid possible confusion regarding the continuity of their democratic rights, the Government needs to provide clarity on EU citizens' voting and candidacy rights after 2021 as soon as possible.

Data toolkit

The data toolkit accompanying this report can be accessed on the3million's website (www.the3million.org.uk). If you have any questions about the report or the toolkit, please contact Alexandra Bulat (alexandra.bulat@the3million.org.uk).

ABOUT THE3MILLION



the3million is the largest organisation campaigning for the rights of EU citizens in the UK. the3million carries out a range of activities, including lobbying in the UK and the EU, legal challenges, media and outreach work. the3million has been recognised as one of the top changemakers in the

Big Issue Top 100 Changemakers 2020 for its work on campaigning for Europeans' rights in the UK. One of the3million's campaigns is focussed on preserving local democratic rights (voting and candidacy rights in local elections) for EU citizens after 2021 and expanding those rights to all UK residents.

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