



1. Introduction

1.1 Under the Legislative Council Ordinance (Cap. 542), all adult permanent residents ordinarily residing in Hong Kong ("ORHK") are eligible to register as voters, though the definition of ORHK is not set out in law. For those adult permanent residents residing on the Mainland or abroad ("PRMA") after voter registration, they can return to Hong Kong for voting provided that they meet ORHK requirement with a residential address in Hong Kong "at the time of applying for voter registration".

1.2 Hong Kong has a very large diaspora, by virtue of its status as a global city and high degree of freedom in people movement. Based on scattered statistics from the Government, some 680 000 permanent residents had emigrated overseas in the two decades before 2003.¹ Moreover, about 540 000 permanent residents usually stayed in Guangdong Province as at mid-2019, though the respective figures for other provinces are not enumerated.² As a facilitative electoral arrangement and in line with global practice seen in 150 places, there are suggestions in the community to provide an option of external voting (i.e. voting outside the territory) to those PRMA meeting ORHK requirement.³ The subject of electoral arrangement for PRMA has been discussed at the Legislative Council ("LegCo") on at least five occasions over the past decade.⁴

1.3 At the request of Hon WONG Kwok-kin, the Research Office has undertaken a study on key features of external voting in selected places.

¹ The Government estimated in 2003 that over 680 000 permanent residents had emigrated overseas in the preceding two decades, while the United Nations estimated that there was a stock of 1.1 million migrants originating from Hong Kong and living in other places in 2019, twice the corresponding figure in 1990. See Constitutional Affairs Bureau (2003) and The United Nations (2019).

² This refers to those permanent residents "who have stayed in Guangdong Province for 6 months and above" during the one-year period at the time of enumeration. See Census and Statistics Department (2020).

³ External voting is defined as allowing overseas citizens to vote from abroad for elections of their homeland. A global study suggests that external voting was allowed in 150 places around the world in 2020, subject to certain conditions to be discussed in Section 2. See International Institute for Democracy and Electoral Assistance (2020).

⁴ GovHK (2011, 2012, 2014 and 2018) and Legislative Council Secretariat (2015).

The United Kingdom ("UK") and Singapore are selected for further study because (a) they have implemented external voting for many years; and (b) they have a large stock of residents living abroad. This information note begins with a concise summary on global practice of external voting, followed by discussion of local electoral arrangements for PRMA in recent years. It will then switch to the external voting systems in the UK and Singapore, along with a concise table for easy reference ([Appendix](#)).

2. Recent global practice of external voting

2.1 Contemporary external voting was seen amongst military personnel and diplomats in major Commonwealth countries after World War I in the 1910s, but it began to extend to overseas citizens in advanced countries in the 1970s, and further to developing countries afterwards.⁵ ***To a considerable extent, external voting is prompted by increased people mobility across the boundary for work or residence amidst a more globalized economy.***⁶ According to the United Nations ("UN"), there were 272 million international migrants in 2019, representing 4% of global population and quadrupling the respective figure of 76 million in 1960. External voting has thus become a prevalent policy instrument used by the home countries to maintain ties with these emigrants. In 2019, external voting was allowed in 150 places, accounting for seven-tenths of jurisdictions in the world. It represents a four-fold increase, as compared with only 31 places in 1991.⁷

2.2 ***Yet external voting is not free from controversy.*** While some may argue that voting is an inalienable right of citizens of the home country even though they are now working or residing elsewhere, others counter that it is unfair to allow people with minimal tax liability and connection to the home country to influence the electoral results.⁸ For temporary migrants, some see external voting could maintain their ties in view of their economic contribution (e.g. remittances and investment) to the home countries, whereas others are concerned about their political influences.⁹ Given that diaspora of some advanced countries (e.g. Portugal and New Zealand) could exceed 10% of local population, enfranchisement of diaspora may tilt the political balance of the home country.¹⁰ Also, there are implementation concerns, including (a) more costly operation of

⁵ International Institute for Democracy and Electoral Assistance (2020).

⁶ International Institute for Democracy and Electoral Assistance (2007) and The United Nations (2019).

⁷ Didyk (2018) and International Institute for Democracy and Electoral Assistance (2020).

⁸ International Institute for Democracy and Electoral Assistance (2007).

⁹ Lafleur (2013).

¹⁰ The United Nations (2019).

external voting; (b) difficulties in maintaining secrecy of elections; and (c) challenges in avoiding electoral fraud throughout the process.¹¹

2.3 ***In view of these concerns and to strike a balance between the unaligned interests between local and overseas citizens, external voting is usually subject to certain conditions and regulations across places,*** as briefly summarized below:

- (a) **Residence period:** Residence period is a common eligibility criterion to ensure that only those overseas citizens with close ties with the home country are given voting rights. This can either take the form of ***maximum length of stay abroad*** (e.g. 25 years in Germany and 15 years in the UK), after which emigrants can no longer take part in voting.¹² Or else, this can be in the form of ***minimum length of stay in home country*** within a specified period (e.g. at least a visit within six years for Australia and three years for New Zealand) to retain its connection. Yet some home countries do not restrict any overseas residence period at all (e.g. Finland, France and the United States);¹³
- (b) **Dual nationality:** Some home countries are indifferent to their external voters holding dual nationality (e.g. Australia, Canada and France). Yet it is not so for others (e.g. Japan, South Korea and Singapore);
- (c) **Applicable elections:** Analysed by type, external voting is more common at national elections (e.g. presidential and parliamentary), as seen in four-fifths of such countries. By contrast, it is not so in local elections (e.g. mayoral elections), as seen in less than one-fifth of countries with external voting;¹⁴
- (d) **Voter registration:** External voters are usually required to (i) have voting records before moving abroad; and (ii) renew overseas voter registration once abroad every year or before the commencement of

¹¹ Electoral fraud related to external voting usually happens in the form of vote-rigging in highly contested constituencies, as seen in scandals in the UK in the 1990s-2000s. The governments usually responded with (a) strengthened vetting of external voter registration; (b) restricting political parties from assisting other people in proxy/postal vote applications; and (c) tightening eligibility of constituencies for external voters. See The Electoral Commission (2014) and Didyk (2018).

¹² Residence requirements of external voting are occasionally challenged in courts. For instance, Canada scrapped the five-year maximum overseas residence period, after the Supreme Court ruled it as "an unjustified violation of the Constitution" in 2019. See International Institute for Democracy and Electoral Assistance (2007) and CTV News (2019).

¹³ International Institute for Democracy and Electoral Assistance (2007 and 2020).

¹⁴ International Institute for Democracy and Electoral Assistance (2020).

an election, via consulates, mail or internet.¹⁵ They also need to provide an address in home country (e.g. a self-owned or parents' property or a last known local address before emigration) for assigning an electoral constituency to them;¹⁶ and

- (e) **Voting methods:** *Personal voting* in designated consulates is the most common form of external voting, as seen in more than half of the home countries with external voting. This is followed by *postal voting* as seen in one-third of home countries with external voting, which nevertheless runs a risk of postal delays. *Proxy voting* is the least common voting method, due to risks of electoral frauds.¹⁷ It is noted that about one-fourth of countries with external voting allow multiple voting methods.

3. Electoral arrangements for eligible residents residing outside Hong Kong

3.1 Hong Kong is a small and open economy, with a high degree of freedom in people movement. Based on an earlier estimation, 680 000 permanent residents of Hong Kong had emigrated to other countries during the two decades before 2003, yet an updated figure is not available. This apart, 540 000 permanent residents of Hong Kong usually resided in Guangdong Province for at least six months annually by mid-2019, upon increased integration in the Greater Bay Area.¹⁸ Taken together, the stock of PRMA originating from Hong Kong should have far exceeded the one million mark, representing more than one-tenth of local population. There are concerns in the local community whether this huge population of PRMA is eligible for voting in elections of Hong Kong.

¹⁵ Few countries (e.g. Japan and South Korea) adopt automatic registration or once-off registration of external voters.

¹⁶ Some countries (e.g. Italy and Portugal) designate a few special constituencies exclusively for external voters to elect politicians representing their interests and avoid affecting electoral results in local constituencies. For instance, the Italian Parliament reserves 12 seats out of 921 seats, while the Portuguese Parliament does the same for 4 seats out of 230 seats.

¹⁷ It is difficult to prove that a proxy's instruction has been acted upon. Also, there are concerns that postal vote may be changed by someone when sending back to the home country, leading to doubt of electoral fraud. See International Institute for Democracy and Electoral Assistance (2007 and 2020).

¹⁸ Presumably, the size of Hong Kong residents residing in other parts of the Mainland (e.g. Shanghai and Beijing) should also be significant.

3.2 Under the Legislative Council Ordinance (Cap. 542), permanent residents of Hong Kong aged 18 and above are eligible to register as voters for LegCo Elections and District Council Elections if they (a) fulfil the ORHK requirement; and (b) have registered their local principal residential address. ***While the statutory requirement of ORHK holds the keys of voter eligibility of PRMA, its definition is not set out in law. At present, enforcement of ORHK is on a "case-by-case basis", having regard to "the actual circumstances of each case and past judicial decisions".***¹⁹ As such, PRMA could be broadly dichotomized into two major segments:

- (a) For those adult PRMA "without maintaining connections with Hong Kong" and without local principal residence address, they are ineligible for voting. Yet it is difficult for the Registration and Electoral Office ("REO") to take enforcement action, due in part to resource constraint.²⁰ Also, local residents need not inform the Government if they are no longer ORHK, given the freedom of movement under the Basic Law; and
- (b) For those adult PRMA returning to Hong Kong regularly (e.g. for work or family reunion), they still maintain a "reasonable connection" and meet the ORHK requirement.²¹ Coupled with provision of proof of principal residential address, such PRMA are eligible for voting.

3.3 ***For those PRMA meeting ORHK requirement and successfully registered as voters, there are suggestions to make facilitative electoral arrangement for them, including external voting.***²² In a public consultation on electoral reform conducted in 2017, there was a suggestion to allow eligible electors working or residing on the Mainland to cast their votes at the offices of the Government on the Mainland.²³ Yet the Government responded in 2018 that "any proposed arrangements for polling outside Hong Kong must be critically examined",

¹⁹ GovHK (2012).

²⁰ REO may conduct regular checks and contact the electors concerned via mail or phone to ascertain their registered addresses and ask for further information if in doubt. Suspicious cases will be referred to law-enforcement agencies. However, the Audit Commission revealed in 2006 that verification of fulfilling ORHK requirement of registered voters by REO was insufficient. See GovHK (2011) and Legislative Council Secretariat (2011).

²¹ Under the Immigration Ordinance (Cap. 115), a person did not cease to be ORHK if he/she was temporarily absent from Hong Kong, depending on the circumstances of his/her absence. Relevant factors considered by REO include (a) the length of absence, (b) the reason for absence, and (c) his/her continuing connections with Hong Kong. Each case would have to be considered on its own merits. See GovHK (2012).

²² GovHK (2012 and 2018), Legislative Council Secretariat (2015) and South China Morning Post (2018a).

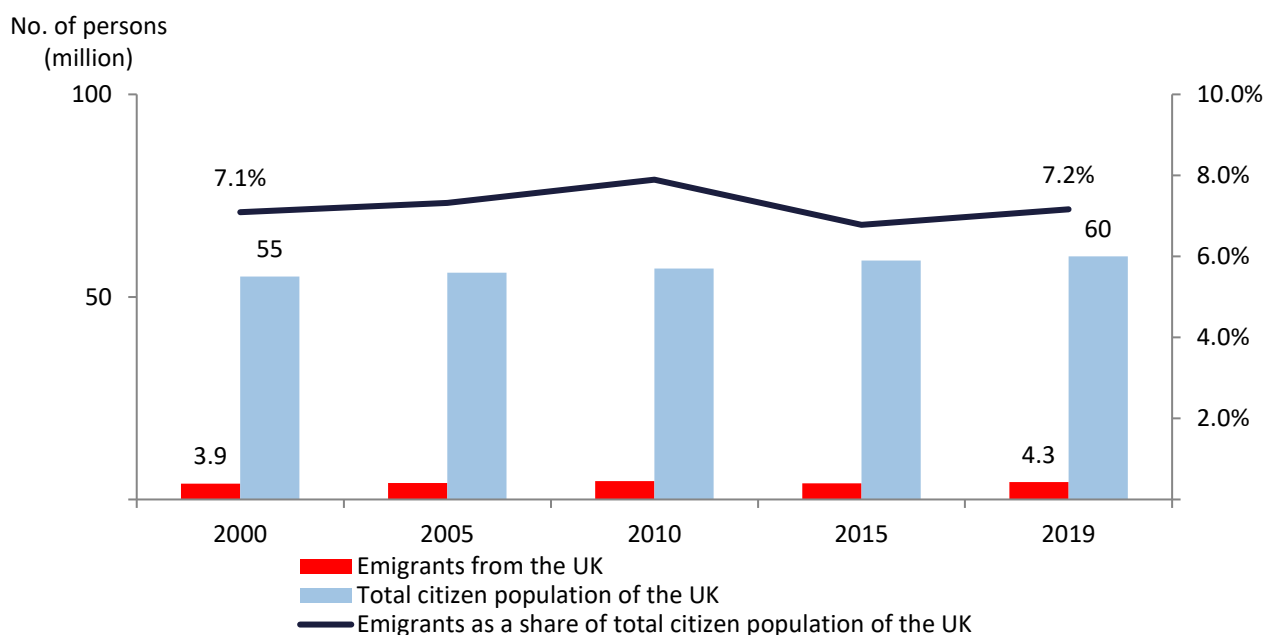
²³ Constitutional and Mainland Affairs Bureau (2018).

ensuring that "elections are conducted in a fair, open and honest manner". The Government "had no plan to implement" the proposal, in view of complicated logistics operation and potential legal issues.²⁴ Implementation concerns include (a) how the polling and counting process could be effectively monitored by the candidates; (b) transportation of ballot papers and ballot boxes to and from polling stations outside Hong Kong; and (c) the risks involved in voting outside Hong Kong.²⁵

4. External voting in the United Kingdom

4.1 The UK has a very long history of emigration to other places (especially its former colonies) back to the 18th century. Reportedly, the stock of British diaspora (consisting of British ancestry and their descendants) amounted to some 140 million, more than twice the 60 million citizens within the territory of the UK in 2019.²⁶ **Confining to the contemporary UK, the stock of its citizens residing abroad has increased by a total of 10% to 4.3 million during 2000-2019, representing 7.2% of its local citizen population (Figure 1).**²⁷

Figure 1 — Population of emigrants from the UK, 2000-2019



Sources: Office for National Statistics and The United Nations.

²⁴ Legislative Council Secretariat (2015) and GovHK (2018).

²⁵ GovHK (2018) and 頭條日報 (2019).

²⁶ Richards (2004).

²⁷ The United Nations (2019).

4.2 The UK is amongst the earliest countries to introduce external voting in the 1910s, but it was exclusively confined to armed services and diplomats in recognition of their contribution at war time. In the 1970s, the UK government faced mounting pressure to enfranchise those British civilians living in other European countries, after the UK became a member of the European Economic Community. Also, the UK government encouraged its citizens to go abroad for business expansion.²⁸ As many overseas Britons still had family ties, properties and tax liabilities in the UK, they were still interested in political participation in the UK.²⁹ **After winning the General Election in 1983, the Conservative government decided to implement external voting. Reportedly, it was due to the allegation that the voting propensity of overseas Britons would be in favour of the Conservative Party.**³⁰ The precedents set by some European countries (e.g. France and Sweden) in granting rights of external voting to their citizens abroad were also catalysts for change.³¹

4.3 In July 1985, **the Representation of the People Act 1985 ("1985 Act") was passed in the UK, requiring overseas Britons to register as "overseas voters" for external voting.**³² This is followed by an amendment of the Act in 1989, and enactment of the Political Parties, Elections and Referendums Act 2000 ("2000 Act"), both target to changing the number of years in maximum overseas residence period ("MORP") as a pre-requisite condition for overseas voters. Here is a summary of the latest statutory features of external voting in the UK:

- (a) **Overseas residence up to 15 years as a pre-requisite:** Conceivably, MORP is laid down by the law to (i) ensure that overseas voters are maintaining close ties with the UK; and (ii) strike a balance between the interests of local voters and overseas voters. Yet the number of years to qualify as MORP has been subject to frequent political debate and revision in the UK.

MORP was originally set at **five years** in the 1985 Act, which was intended to be long enough for registered external voters to participate in at least one election. But this requirement was then deemed to be "unduly restrictive", with just an annual average number of 5 000 registered overseas voters during 1987-1989. After a review, MORP was substantially extended to **20 years** when the Act was amended in 1989, leading to almost four-fold increase in the annual

²⁸ Wilks-Heeg (2008), House of Commons (1989) and House of Commons Library (2019).

²⁹ House of Lords (1985) and House of Commons (1989).

³⁰ International Institute for Democracy and Electoral Assistance (2007), House of Commons (1989) and House of Commons Library (2019).

³¹ House of Commons (1984a).

³² House of Lords (1985).

average number of registered overseas voters to 23 800 during 1991-1997. Nevertheless, when the Labour Party formed a new government in the late 1990s, it opined that the "20-year MORP" was "excessive". After the enactment of the 2000 Act, it was cut down to **15 years** in 2002. The "15-year MORP" has been in place for almost two decades till now, in spite of further attempts to change MORP to be discussed later.

- (b) **Dual-nationality holders allowed to vote:** As the UK does not impose any restrictions on other nationalities held by its citizens, overseas voters of the UK with foreign citizenship can still register as voters;
- (c) **Annual registration:** British citizens abroad can apply for registration as "overseas voter" and must have been voters before moving abroad. All overseas voters need to renew their voter registration annually (either through mail or internet) for showing their determination to maintain ties with the UK.³³ During voter registration, they need to (i) provide their last address in the UK before moving abroad for assigning an electoral constituency; (ii) choose a voting method (either proxy or postal voting); and (iii) make an overseas declaration for prevention of electoral fraud;³⁴
- (d) **Confining to national elections:** External voting applies to national elections only (i.e. parliamentary election and national referendum). Yet external voters cannot vote in local elections (i.e. mayoral and local councils) because overseas voters are conceived to have fewer stakes in local affairs, while the UK government also takes this measure as a means to circumscribe the influence of overseas voters in local matters; and
- (e) **Voting method and procedures:** Overseas voters need to choose one of the two voting methods (i.e. postal or proxy) beforehand, which are also applicable to local voters.³⁵ All external voters need to apply for one voting method by post before the election, providing date of birth and signature for fraud prevention.³⁶

³³ By contrast, local voters in the UK need to register only once, except changing their personal particulars in voter registration.

³⁴ House of Commons (1984a) and House of Lords (1989).

³⁵ Overseas voters registered in constituencies of Northern Ireland can only choose proxy voting, as the law does not allow sending ballots outside the country. See House of Commons (1984a).

³⁶ The signature and date of birth are checked at the stage of application, and further verified when counting postal ballots to avoid electoral fraud. See The Electoral Commission (2020b).

For **postal voting**, postal ballots will be delivered to the registered overseas address of external voters about three weeks before the election. In return, voters need to send the completed postal ballots early enough so that they can reach the local authority in the UK before the end of the polling day.³⁷ In view of frequent complaints of postal delays, the UK government advises external voters to opt for proxy voting if they do not receive their postal ballots two weeks before the election.³⁸

For **proxy voting**, each registered voter in the UK can be a proxy for close relatives (i.e. spouse, parents and children) and up to two other friends abroad in an election. Such proxy vote can either be cast at the polling station assigned to the overseas voter or by post.

4.4 While most of the features of external voting implemented are apparently well-accepted in the UK, **the "15-year MORP" is still the bone of contention**. For instance, the Conservative Party is striving to scrap the MORP entirely, campaigning "votes for life" in its party manifesto since 2015.³⁹ If realised, all Britons abroad could have the right to vote in the UK, irrespective of years of overseas residence. Actually, the Conservative government has made three attempts to introduce bills to enfranchise all citizens abroad during 2014-2019, but they were either withdrawn or adjourned in the absence of consensus in the Parliament.⁴⁰ In a ruling of the judicial review in April 2016, the High Court of the UK rejected the claims made by two overseas Britons that "15-year MORP" constituted a restriction to their rights of free movement.⁴¹ The British society is still divided on how to amend the MORP at present.

³⁷ As some postal votes were reportedly not sent out 10-12 days before an election due to administrative and logistical reasons, the parliamentary election timetable was lengthened from 17 days to 25 days to facilitate postal voting in 2015. See The Guardian (2019).

³⁸ In the UK, postal and proxy voting method are also available to local voters (e.g. ill, disable, on holiday or work on the polling day), not just external voters. As a whole, postal voting seems to be more preferable than proxy voting. In the five General Elections held during 2001-2017, an average of 16% of voters chose the former, with only 0.6% chose the latter. See GovUK (2020).

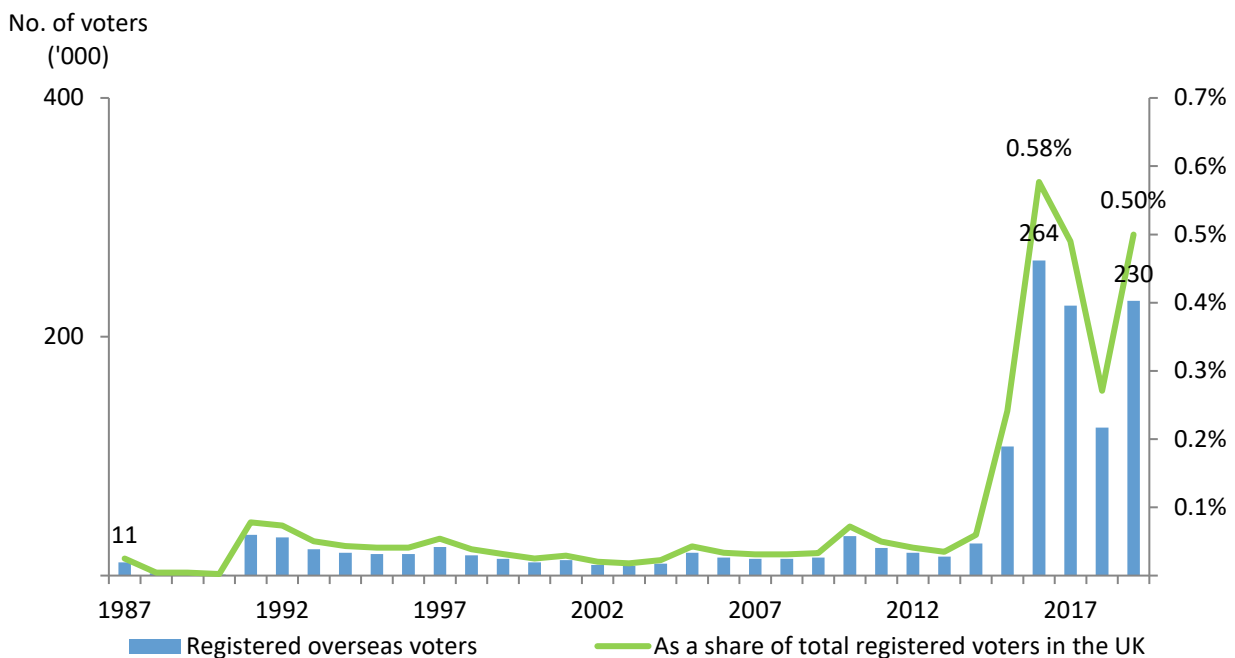
³⁹ Some Britons feels that it is unfair to treat overseas Britons as "second-class citizens", with limited voting rights.

⁴⁰ These Bills were The Overseas Voters (15 Year Rule) Bill 2014-15, The Overseas Voters Bill 2015-16, and Overseas Electors Bill 2017-19. See House of Commons Library (2019).

⁴¹ Two British citizens living in Italy and Belgium since 1982-1987 wished to vote in the Brexit referendum in 2016. They challenged the legality of the "15-year MORP" in a judicial review, but in vain. See House of Commons Library (2019).

4.5 **The number of British overseas voters used to be small, but surged in recent years on the back of the Brexit referendum in 2016.** The annual number of registration of overseas voters ranged between 1 800-34 500 during 1987-2014, which was small compared with a stock of over 4 million Britons living overseas in 2014 (**Figure 2**). Also, such overseas voters represented far less than 0.1% in overall voter registrations in the UK. However, overseas registrations surged by leaps and bounds to a peak of 285 200 in June 2017, prompted by the Brexit referendum in 2016 and the parliamentary elections afterwards, resulting in an enlarged share of 0.6% in total registration of voters in the UK. There are no statistics on voter turnout rate of overseas voters in the UK, however.⁴² Also, there are very few reports of electoral fraud arising from external voting in the UK.

Figure 2 — Number of registered overseas voters in the UK, 1987-2019



Sources: Rallings and Thrasher, Office for National Statistics and House of Commons Library.

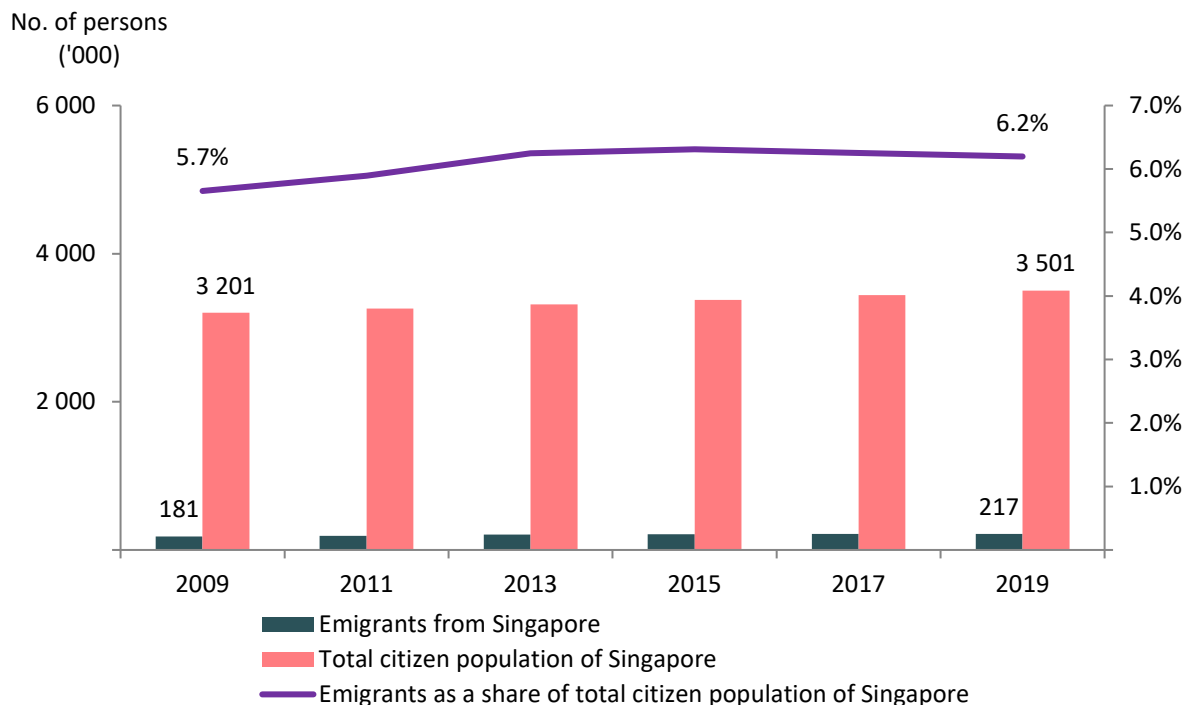
5. External voting in Singapore

5.1 Singapore has a small population of just 5.7 million (comprising 3.5 million citizens, 0.5 million permanent residents and 1.7 million non-residents) in 2019. Its stock of overseas citizens has increased by a total of 20% to 217 200 during 2009-2019, representing 6.2% of the local citizen population (**Figure 3**). The top

⁴² The overall turnout rate of General Elections in the UK was in decline in recent decades, dwindling from 75% in 1987 to 67% in 2019.

three emigration destinations of Singaporeans are Australia, Malaysia and the UK. As a whole, they take up about two-thirds of Singaporean diaspora.

Figure 3 — Population of emigrants from Singapore, 2009-2019



Source: Singapore Department of Statistics.

5.2 Overseas Singaporeans used to return to their homeland for voting for a long time. Since 1983, the Singaporean government had explored the feasibility of granting external voting rights to its overseas citizens, but the proposal could not proceed further due to relatively small size of diaspora by then and a number of operational concerns (e.g. difficulty of tracking citizens abroad and verifying their last known addresses in Singapore).⁴³ After a lull of almost two decades, the Singaporean government enacted a law to allow external voting in a limited scale in 2001 subject to regular review, with a view to strengthening the bond with increasing number of Singaporeans working and studying overseas under "economic globalisation".⁴⁴ Yet ***the debut of external voting was postponed by five years to the 2006 General Election***, due to security concerns after the terrorist attack in the United States on 11 September 2001.

⁴³ Parliament of Singapore (1998) and Lua et al. (1996).

⁴⁴ Parliament of Singapore (2001a).

5.3 **Statutory provisions on external voting in Singapore are laid down in the Parliamentary Elections (Amendment) Act 2001, but the Act was amended in 2009 to relax the residence requirement.** Here is the summary on the statutory features:

- (a) **Minimum stay of 30 days in three years in Singapore as pre-requisite:** Unlike MORP in the UK, the Singaporean government adopts minimum "ordinary residence" in Singapore as an indicator of connection to the home country, partly because it can identify overseas citizens with "intentions to resume residence in Singapore". Also, it is considered to be "safe and simple" in implementation. At first, minimum staying period of external voters in Singapore was specified as "an aggregate of 2 years within 5 years before the election" in 2001. But it was subsequently relaxed to "30 days within 3 years before the election" in 2009, as the earlier requirement was considered to be too stringent (with just 553 registered external voters voted in 2006).⁴⁵ The rationale of this qualifying period was straight-forward: overseas Singaporeans taking 10-day annual leave and returning home "to visit his family and friends" can easily achieve the requirement of 30 days in three years;⁴⁶
- (b) **Excluding dual-nationality holders from voting:** As the Singaporean government does not recognize dual nationality, overseas Singaporeans with foreign citizenship cannot register for external voting. Yet Singaporean citizens who are just permanent residents of another country are still eligible for external voting;⁴⁷
- (c) **Registration procedures:** Unlike the UK, overseas Singaporeans need not renew their voter registration annually. Registration or update of personal particulars can be done online any time before the writ of election is issued and after the election. Applicants need to provide their addresses in Singapore and abroad for assignment of a local electoral constituency and overseas polling station.⁴⁸ If external voters did not vote in the previous election, their names will be removed from the Register of Electors to ensure that only committed

⁴⁵ Parliament of Singapore (2007 and 2008b).

⁴⁶ Parliament of Singapore (2008a and 2008b).

⁴⁷ Parliament of Singapore (2001b).

⁴⁸ The registered address in Singapore must be a property owned by the applicants or their close relatives instead of their friends to avoid electoral fraud. The definition of close relatives is more or less the same with the UK. See Parliament of Singapore (2001a).

voters are allowed external voting. The removed voters are required to apply for name restoration if they intend to vote in next election;⁴⁹

- (d) **Applying to all elections:** Eligible external voters can vote in all elections (i.e. both presidential and parliamentary) in Singapore. There is no local election in Singapore (as seen in bigger countries); and
- (e) **Personal voting at one of the selected 10 overseas polling stations:** Unlike the UK, there is only one form of external voting in Singapore (i.e. personal voting). This is considered to be "simplest, reliable and most transparent", ensuring "the integrity and secrecy of the voting process" and avoiding issues arisen from postal voting as seen in other places.⁵⁰ The Singaporean government selects 10 overseas polling stations in major global cities and assign the closest one to each overseas voter.⁵¹ All these stations are located in embassies or consulates.

There are calls to increase the number of overseas polling stations, as there are over 50 Singaporean missions altogether. The Singaporean government doubled the number of polling stations from that of five in 2006. It also pledged to regularly review the situation, but pointed out that citizens abroad are also responsible for "taking a step forward to exercise their right to vote" by coming back to Singapore or the ones which are closest to them.⁵²

On polling hours, external voting can be held before the poll opens in Singapore, but its closure must not be later than that in Singapore. All ballots cast will be returned to Singapore no later than 10 days after the polling day for counting.⁵³ Candidates may assign their agents to monitor the voting process in overseas polling stations.

⁴⁹ Elections Department (2020).

⁵⁰ Postal voting is not offered because of (a) the risk of postal delay and difficulties in maintaining secrecy of ballots; and (b) fewer days for voters to absorb electoral information if they vote by post in advance. See Parliament of Singapore (2001b, 2008a, 2010 and 2016).

⁵¹ At present, the 10 overseas polling stations in the Singaporean embassies/consulates are located in Canberra, London, Tokyo, Beijing, Shanghai, Hong Kong, Washington, New York, San Francisco and Dubai. Their choices are based on factors such as (a) number of Singaporeans living in a city/country; (b) distance from Singapore; and (c) staff and facilities available for managing external voting.

⁵² Parliament of Singapore (2001b and 2015).

⁵³ Except a close difference of votes of which external votes might determine the result in a highly contested constituency, all electoral results will usually be announced immediately after counting all ballots cast in Singapore.

5.4 ***The number of external voters witnessed an almost eight-fold increase in four elections (three parliamentary and one presidential since its debut in 2006).*** In the latest parliamentary election held in 2015, there were 4 900 registered external voters, increasing by 780% over 2006 (**Figure 4**). Their share in total voter registrations quadrupled from 0.05% to 0.2% over the same period. As regards the turnout rate of external voters, it increased from 61% to 70% during 2006-2015, lower than the overall turnout rate of 94% in both years.⁵⁴ So far, there is no complaint of electoral fraud on external voting in Singapore.⁵⁵

Figure 4 — Statistics on external voting in Singapore, 2006-2015

	<u>Presidential election</u>	<u>Parliamentary election</u>		
	2011	2006	2011	2015
1. Number of registered external voters ^(a)	5 504	553	3 453	4 868
- As a share of total registered voters	0.24%	0.05%	0.16%	0.20%
2. Number of external voters voted	3 375	335	2 683	3 415
3. Turnout rate of external voters	61%	61%	78%	70%
4. Total turnout rate of all voters	95%	94%	93%	94%

Note: (a) Excluding registered external voters allotted to uncontested electoral constituencies.

Sources: Elections Department and Parliament of Singapore.

6. Observations

6.1 In **Hong Kong**, there are calls to introduce facilitative electoral arrangement for those PRMA meeting ORHK requirement with local residential address, such as voting outside the territory of Hong Kong. The Government responded that such suggestion "must be critically examined" to ensure that "elections are conducted in a fair, open and honest manner", in view of a number of legal and logistics issues.

⁵⁴ Voting is mandatory for local voters in Singapore, but not so for external voters. See Parliament of Singapore (2007) and Elections Department (2011 and 2015).

⁵⁵ BBC (2015) and Freedom House (2020).

6.2 In the **UK**, all eligible overseas Britons are allowed to register as overseas voters as from 1985, provided that their overseas residence period does not exceed 15 years at present. Its external voting system is designed for balancing the interests of local and overseas voters on the one hand, and for fraud prevention on the other. Its key features include (a) applicable to dual-nationality holders; (b) confining to national elections only; (c) annual renewal of voter registration; and (d) voting either by proxy or by post.

6.3 In **Singapore**, overseas citizens have been eligible for external voting since the 2006 General Election, provided that they have resided in Singapore for at least 30 days within three years before the election at present. Likewise, its external voting system is for balancing the interests of local and overseas voters and for fraud prevention, with such key features as (a) not applicable to dual-nationality holders; (b) applying to all elections; (c) no need to renew voter registration annually; and (d) single option of personal voting in designated overseas polling stations.

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External voting in the UK and Singapore

	The UK	Singapore
1. Year of granting external voting to civilians abroad	1985	2001
2. Population of overseas citizens ('000)	4 275 (2019)	217 (2019)
3. Share in total citizens of the homeland	7% (2019)	6% (2019)
4. Number of registered external voters ('000)	230 (2019)	5 (2015)
5. Share in total voter registrations of the homeland	0.5% (2019)	0.2% (2015)
6. Turnout rate of external voters	-	70% (2015)
7. Key features of external voting		
(a) Maximum overseas residence period	15 years	✘
(b) Minimum staying period in homeland	✘	30 days in 3 years
(c) Dual-nationality holders eligible for registration	✓	✘
(d) Applicability of elections	National	National
(e) Voting method	Proxy & postal	Personal
(f) Pre-assigned local constituency	✓	✓
(g) Voting in homeland on the polling day	✓	✓
8. Major requirements of voter registration for external voters		
(a) Registered address in homeland	Last known address before emigration	Self-owned/parent's property
(b) Declaration form	✓	✓
(c) Frequency of voter registration	Annual	Any time before the election
(d) Removal of registration if failed to vote	✘	✓
(e) Online registration portal	✓	✓

Note: (-) Information is not available.

Sources: The United Nations, House of Commons, Parliament of Singapore and Elections Department.

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