

# New Blueprint for a Modern Electoral Landscape

How to bring resilience and capacity to UK democracy

February 2025

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## **Executive summary**

"Rather than supporting the electoral process, an ever-increasing collection of Acts and secondary legislation too often works against its effective delivery. Elections are often delivered in spite of, rather than because of, the fragmented and outdated legislative framework."

The statement above is from <u>our first</u> <u>Blueprint</u> published in July 2021.

#### It remains true in 2025.

Since 2021, the electoral sector has grappled with the Elections Act 2022 and other legislative change. More is coming. With votes from 16 and an emphasis on voter registration in the new UK Government's manifesto, informed consolidation and rational reform of electoral law and practice is needed more than ever. Add plans for local government reorganisation and increased devolution in England, and the landscape becomes increasingly difficult to navigate.

Once again, we have reviewed each stage of the current electoral process. Many of the recommendations require legislative action from the UK and/or devolved governments, which we hope will be approached in a consolidated rather than piecemeal manner. Alongside technical recommendations to improve how elections run, we are calling for:

- An independent Royal or Parliamentary Commission review of core election delivery processes.
- A review of all existing electoral law to produce a single Electoral Administration Act which respects devolved nation differences.
- UK and devolved governments to work collaboratively on electoral matters to limit divergence.
- An urgent review of electoral funding and funding mechanisms.
- UK Government to review supplier capacity to identify and mitigate against potential risk.

We would like to thank our members across the national and regional branches of our Association for contributing to this report. As always, their frontline experiences and expertise have been key to informing our recommendations. Their dedication and commitment to delivering elections and electoral registration is often to their personal detriment. It is not a sustainable way to run a critical 'no-fail' service.

We look forward to continuing to work with partners across governments, regulatory bodies and the wider local government and electoral sectors alike. It is only by working together to understand key issues, and learn from collective electoral memory and skills, that we can build a modern electoral system we and electors can all maintain confidence in.

## Recommendations

#### **Postal voting**

I. Offer Returning Officers a localised messaging option on the citizen-facing application website, to tell electors when they can expect their postal vote to be despatched depending on when their application is received.

**2.** Change the postal vote deadline for all polls in Great Britain to 17:00 16-working days before the poll.

**3.** Governments to consider how to support capacity and build resilience in the electoral supply system, particularly around print and postal services.

**4.** Introduce a statutory deadline for determining absent vote applications before a poll.

**5.** Legislate to allow Returning Officers to legally issue postal votes to newly registered electors prior to the objection period expiring for their registration application.

**6.** Legislate to allow Electoral Registration Officers to use locally held data to verify absent vote applications.

**7.** Amend legislation to allow a postal vote to be reissued when a Returning Officer is satisfied it is lost or undelivered.

8. Where a Returning Officer is satisfied a postal vote has not been received, governments to consider the merits and challenges of allowing the elector to cancel it and either vote in person or appoint a proxy.

9. Extend online absent vote application and reapplication provisions to devolved polls at the earliest opportunity, and by 31 January 2026 at the latest, ahead of scheduled Scottish Parliamentary and Senedd elections.

**9a.** If Recommendation 9 is actioned, put transitional arrangements in place to prevent an existing devolved postal voter from losing their postal vote prior to the 2026 devolved polls due to any rule alignment.

#### Other absent voting provisions

**10.** Consider the merits and necessary safeguards of extending emergency proxy provisions to give Returning Officers more flexibility to help electors, including allowing emergency proxy applications to be made online.

**11.** Allow an elector to change their proxy if the person they appointed can't get to the polling station for any reason which, if they were applying for themselves, would meet the threshold to appoint an emergency proxy.

**12.** Formalise in law the process to cancel an issued postal ballot paper where an elector is subsequently deleted from the electoral register during an election period.

#### **Elections Act 2022 impacts**

**13.** Review and refine the list of accepted forms of voter ID and consider including digitally issued ID.

**14.** Issue digital Voter Authority Certificates as well as printed versions.

**14a.** If Recommendation 14 is implemented, consider the merits of moving the Voter Authority Certificate application deadline closer to polling day.

**15.** Introduce a statutory deadline for determining Voter Authority Certificate applications before a poll.

16. Extend replacement Voter Authority Certificate provisions to any elector who applied in the previous 28 days but has not received it, regardless of when it was issued.

**17.** UK Government to engage with electoral administrators and continue to develop the ERO portal functionality and front-end user journeys at pace.

**18.** Extend respective legislation and penalty for intimidatory behaviour to cover Returning Officers, Electoral Registration Officers and their staff.

**19.** Review the impact Elections Act provisions have made to different demographics in society and where required, review legislation to remove barriers to voting.

#### Other election considerations

**20.** Make provision for all candidate nomination papers to be submitted online via a UK-wide and government funded portal integrated into local electoral management systems.

**21.** Expand hand delivery provisions for nominations to include allowing any candidate-authorised person to hand deliver nomination papers at all elections.

**22.** Electoral Commission to review all forms used as part of candidate nomination at all elections.

**23.** Simplify the nominations process by removing the requirement for electors to sign each nomination.

**24.** Review candidate deposit amounts for all polls where they are required.

**25.** Consider the impact of introducing a candidate ID requirement, reviewing the merits and impacts on candidates, agents, Returning Officers, the election timetable and nominations process.

**26.** Carry out a full review of current polling provision, including polling hours, weekend voting, voting hubs and how technology could benefit polling processes.

**27.** Consider abolishing administratively burdensome and costly Neighbourhood Planning Referendums in England.

## Recommendations

## Other election considerations continued

**28.** Review and redraft Business Improvement District regulations for each nation to bring clarity and certainty to how ballots are run.

**29.** Abolish outdated non-binding parish polls in England.

**30.** Extend the Electoral Commission's remit to provide support and guidance for all statutory polls and referendums held in Britain.

**31.** Abolish recall petitions and instead legislate for an MP's automatic disqualification from office based on the three recall triggers in the Recall of MPs Act 2015.

**32.** If recall petitions remain in place, amend the current fixed six-week timeframe to immediately end if the 10% electorate threshold is reached.

**33.** Legislate for an extended 30-day electoral timetable for all polls, increasing capacity and resilience.

**34.** Change nomination deadlines from 16:00 to 12:00 for all polls to allow ballot proofing to take place earlier and postal votes to be despatched sooner.

**35.** Change the registration deadline for all polls in Britain to 17:00 16-working days before the poll to align with the recommended postal vote deadline (Recommendation 2).

**36.** Electoral Commission to redesign registration and absent vote communications and messaging to encourage early applications and better inform absent voting option decisions.

#### **Electoral registration**

**37.** Abolish the open electoral register across Britain.

**38.** Review fees for selling the full register to accurately reflect costs incurred by the public purse for compiling the register, not just the cost of supply.

**39.** Review legislation that allows second registrations for students and second homeowners. If allowed to continue, amend the law to clearly define residency and what constitutes a valid second home.

**40.** Consider the merits of linking or centrally storing electoral registers to support improving voter registration, help limit applications from already registered electors and strengthen fraud prevention.

**41.** Fully review whether the annual electoral registration canvass in Britain adds value, if a yearly canvass is still required and if the current two stage registration process is effective.

**42.** Review whether to continue with the electoral registration objection period and 14-calendar days for monthly alterations.

**43.** Review statutory communication requirements for electoral registration to remove unnecessary bureaucracy and burden on the public purse.

#### **Overseas electors**

**44.** Change the postal vote deadline for overseas electors to 17:00 16-working days before a poll.

**45.** Consider the merits and impacts of allowing overseas postal voters to change their voting method to in person or by proxy where the timescale for receiving and returning their postal vote is no longer viable.

**46.** Change the registration deadline for overseas electors to 17:00 16-working days before a poll to be the same as the recommended postal vote deadline (Recommendations 2 and 44).

**47.** Explore the possibility of creating overseas constituencies to offer an alternative voting option for overseas electors.

**48.** UK Government and the Electoral Commission to review overseas elector communications to manage expectations and allow electors to make informed decisions on voting method choices.

## Management, modernisation and oversight

**49.** Set up an independent Royal or Parliamentary Commission review of core election delivery processes.

**50.** Review all existing electoral law to produce a single Electoral Administration Act which respects devolved nation differences.

**51.** UK and devolved governments to work collaboratively on electoral matters to limit, wherever possible, the divergence in practice for different electoral events.

**52.** Review all electoral funding and funding mechanisms as a matter of urgency, to provide transparency for local authorities, Electoral Registration Officers and Returning Officers.

**53.** Introduce a mechanism to fully reimburse national electoral event registration costs incurred by local authorities and Valuation Joint Boards.

**54.** Grant Returning Officers the ability to decide when to run their counts, for all types of election, without restrictions from legislation or interference from third parties.

**55.** Introduce an electronic system to deliver, receive and return Writs at UK Parliamentary general elections and by-elections.

**56.** Amend legislation to remove the compulsory requirement for printed candidate booklets to be sent to every household/elector at certain polls.

**56a.** If the compulsory requirement for printed candidate booklets is not removed, amend legislation to require printed candidate booklets to be sent to each household, not each elector, in the interests of the public purse.

**57.** Conduct a review of supplier capacity to identify and mitigate against potential risk.

## **Postal voting**

## We believe postal voting is the biggest threat to the safe and secure delivery of any election.

At the 2024 UK Parliamentary General Election (UKPGE), postal votes were issued to 9,584,733 electors[1]. This volume risks every major poll.

Capacity across the supply chain leaves entire elections vulnerable. Even at polls with lower turnouts, any postal vote related issues can call a result into question.

## **Application volumes**

Approximately 1.3million new postal vote applications were made for the 2024 UKPGE. These were submitted between the election being called on 22 May and application deadline on 19 June. Figures published by MHCLG show 85% of these applications were made online, a huge number considering this was the first UKPGE online applications were available.

The number of applications overwhelmed many Electoral Registration Officers (EROs) and their teams, who were simultaneously managing an avalanche of registration requests.

EROs previously published application forms online for electors to download, or sent them on request by email or post. Each form was accompanied by information outlining when postal votes would be sent for a particular election depending on when a completed application was received. Postal vote issuing dates have always been dependent on both the electoral timetable and print schedules. Electors who were going to be away from home would know if their ballot paper would arrive in time to be completed and returned. If not, they would be prompted to contact their ERO to discuss alternative options.

The nationally-led 'one-size-fits-all' digital approach introduced on 31 October 2023 means electors no longer receive tailored local messaging. This can result in electors having unrealistic expectations about when their postal vote will arrive. At the 2024 UKPGE many said their postal ballot was not received in time. A problem doubtless exacerbated by a summer poll, held during school holidays in Northern Ireland and Scotland.

#### **Recommendation 1**

Offer Returning Officers a localised messaging option on the citizen-facing application website, to tell electors when they can expect their postal vote to be despatched depending on when their application is received.



### Postal vote deadlines

Electors in Britain can apply for a postal vote up to 17:00 11-working days[2] before a poll. The later the application, the shorter the time to process, print, deliver and return postal votes.

In Northern Ireland, electors must apply by 17:00 14-working days before a poll. Unlike Britain, there is no postal voting on demand for Northern Ireland electors. Electors must meet specific valid reasons to request one.

In the days before the 2024 UKPGE, media reporting focused on postal votes not arriving, with a range of different reasons in play.

Delivery issues were arguably most keenly felt in Scotland where school holidays started before polling day. Northern Ireland school holidays also coincided with the UKPGE, but there were no reported postal vote issues. This lends weight to our hypothesis that extra processing time increases capacity and resilience for all involved. We do not believe current postal vote deadlines in Great Britain work for anyone involved.

As already highlighted, the implementation of an online application system, which we have always supported, has the unintended consequence of creating unrealistic elector expectations.

The 2024 UKPGE felt like a perfect storm. Timescales and supplier capacity continue to be tested by ever-increasing volumes of postal votes. An earlier postal vote deadline would increase capacity and resilience. It would also help Returning Officers (ROs) manage and meet electors' expectations.

#### **Recommendation 2**

Change the postal vote deadline for all polls in Britain to 17:00 16-working days before the poll.

## **Suppliers**

The complexity of printing over 9.5 million 2024 UKPGE postal vote packs from a standing start - alongside over 48 million poll cards and around 50 million ballot papers - must not be underestimated.

The 2024 UKPGE was a true return to snap elections following the introduction of the Dissolution and Calling of Parliament Act 2022. Rightly or wrongly, the sector expected an autumn poll.

Announcing the UKPGE just 14-working days after May polls were held across England and Wales was entirely unexpected. Election teams and suppliers had to swing back into action immediately.

Printers were hard-pressed to meet UKPGE printing volumes within the 25-working day timetable. Timeframes, volumes, and capacity issues must be addressed.

Royal Mail capacity and reliability has been problematic for years. There were issues across the board at both the May 2024 scheduled polls and the UKPGE.

#### **Recommendation 3**

Governments to consider how to support capacity and build resilience in the electoral supply system, particularly around print and postal services.



## **Identity verification**

Introducing identity verification for absent vote applications, without subsequent changes to determination rules, has been a challenge for EROs.

Unlike registration applications, there is no prescribed legal deadline for determining absent vote applications received by the deadline.

An elector who applies in time but needs to submit documentary evidence or an attestation can legally do so up until 22:00 on polling day. They could still legitimately expect to receive their requested absent vote. This mismatch means messaging is confusing and EROs and ROs cannot support electors in a consistent manner.

Current legislation creates a further barrier for ROs issuing postal votes to newly registered electors. ROs are unable to issue a postal vote to a newly registered elector until the 5-day objection period linked to the registration application has expired. For example, if an elector applies to register to vote and applies for a postal vote 12-working days before the poll, the earliest their postal vote can be issued is 6-working days before the poll when the elector is added to the register.

In addition, unlike all other registration applications, EROs cannot use local data to verify an absent vote application that fails a DWP identity match. This means any unverified applicant must provide documentary evidence or an attestation.

#### **Recommendation 4**

Introduce a statutory deadline for determining absent vote applications before a poll.

#### **Recommendation 5**

Legislate to allow Returning Officers to legally issue postal votes to newly registered electors prior to the objection period expiring for their registration application.

#### **Recommendation 6**

Legislate to allow Electoral Registration Officers to use locally held data to verify absent vote applications.

## Reissuing a lost or undelivered postal vote

An RO's default position is to want to help electors. However, the law prevents them replacing lost or undelivered postal votes until just 4-working days before a poll.

This often allows insufficient time to send and return a postal vote pack, and is a particular issue for overseas electors.

Changing legislation to allow lost or undelivered postal votes to be reissued at the point in time 'when the RO is satisfied' would be more reasonable and offer a better service to electors. It would allow ROs to respond quickly when they know there are delivery or other issues with postal votes.

While allowing earlier reissue is beneficial and should remain an option for all postal voters, it is no solution for electors who are already away from home.

Changing legislation to offer electors the option of cancelling their postal vote if they don't or won't receive it in time, and to either appoint a proxy or vote in person themselves, would further mitigate the risk of disenfranchisement.

Consideration should be given to the timeframe for deciding when to reissue/cancel a postal vote considering the merits for electors and the challenges facing EROs and ROs.

#### **Recommendation 7**

Amend legislation to allow a postal vote to be reissued when a Returning Officer is satisfied it is lost or undelivered.

#### **Recommendation 8**

Where a Returning Officer is satisfied a postal vote has not been received, governments to consider the merits and challenges of allowing the elector to cancel it and either vote in person or appoint a proxy.



### **Devolved nations**

Both Scottish and Welsh Governments decided not to extend online absent vote applications (OAVA) to devolved polls when the system was implemented. Following the 2024 UKPGE, we believe this has led to many electors having an absent vote for reserved polls only.

With Scottish Parliamentary and Senedd elections scheduled for 2026, EROs are considering how best to address this divergence.

In addition, there is increasing elector confusion over different refresh and reapplication requirements for devolved and reserved postal votes.

The <u>Absent Voting (Elections in Scotland</u> <u>& Wales) Bill</u> has been introduced as a Private Members Bill by Tracey Gilbert, MP for Edinburgh North and Leith. It intends to extend online absent voting provisions and reapplication requirements to devolved polls. We support the principle of the Bill.

#### **Recommendation 9**

Extend online absent vote application and reapplication provisions to devolved polls at the earliest opportunity, and by 31 January 2026 at the latest, ahead of scheduled Scottish Parliamentary and Senedd elections.

#### **Recommendation 9a**

If Recommendation 9 is actioned, put transitional arrangements in place to prevent an existing devolved postal voter from losing their postal vote prior to the 2026 devolved polls due to any rule alignment.

## Other absent voting provisions

## **Emergency proxy provisions**

Current emergency proxy[3] provisions, do not help electors who need to care for someone taken ill at short notice, go to a medical appointment, or attend a funeral.

While balancing the fraud risk of unattested applications, the merits of extending emergency proxy provisions should be considered.

The current paper-based system of applying for an emergency proxy is unhelpful for some electors, such as someone ill in hospital.

Consideration should be given to online emergency proxy applications including mechanisms for attestation to be provided online with the necessary safeguards required to mitigate fraud.

Additionally, for most polls, electors cannot change their appointed proxy after 6-working days before a poll[4], unless the proxy has lost their photo ID.

If a proxy cannot make it to the polling station for reasons that would allow an elector themselves to appoint an emergency proxy, the elector should be able to appoint a new emergency proxy.

#### **Recommendation 10**

Consider the merits and necessary safeguards of extending emergency proxy provisions to give Returning Officers more flexibility to help electors, including allowing emergency proxy applications to be made online.

#### **Recommendation 11**

Allow an elector to change their proxy if the person they appointed can't get to the polling station for any reason which, if they were applying for themselves, would meet the threshold to appoint an emergency proxy.

# Process to cancel an issued postal ballot paper

There are no prescribed processes to allow an RO to cancel a postal vote issued to an elector who is subsequently deleted from the register during an election period. This is despite Section I of the Representation of the People Act 1983 making it clear these votes cannot be counted.

A clearly defined procedure should be set out in legislation for how to cancel an issued postal ballot paper in these circumstances.

#### **Recommendation 12**

Formalise in law the process to cancel an issued postal ballot paper where an elector is subsequently deleted from the electoral register during an election period.





## **Elections Act 2022 impacts**

## Forms of voter ID

We agree with the Electoral Commission that UK Government should review the current list of accepted forms of voter ID, identifying whether any should be removed or added to improve accessibility for voters[5].

Legislation[6] has been introduced to include the HM Armed Forces Veteran Card and National Entitlement Card issued by Scottish local authorities as accepted ID from I May 2025. However, we believe other forms of ID should be considered, such as the Merseytravel Over 60s pass and firearms licences that are more common in rural areas.

We also believe alternative ID formats should be considered, such as digitally issued ID. UK Government is already working to help people securely prove who they are without having to present physical documents[7], with the launch of GOV.UK Wallet due to include digital driving licences and more. We believe voter ID should be included as part of this workstream.

#### **Recommendation 13**

Review and refine the list of accepted forms of voter ID and consider including digitally issued ID.

## **Voter Authority Certificates**

The way Voter Authority Certificates (VACs) are issued, and the subsequent impact on issuing a Temporary Voter Authority Certificate (TVAC), brings confusion and uncertainty for electors and EROs.

A VAC can only be printed by the government contracted printer, not an ERO.

Whether a VAC applicant can have a TVAC depends on when the supplier printed it, introducing inconsistencies and a lack of clarity. It also means only electors with a VAC printed after 17:00 6-working days before a poll can have a TVAC. Any elector with a VAC printed before this deadline, but who has not received it, cannot have a TVAC. Currently, they are only entitled to apply for an emergency proxy.

#### **Recommendation 14**

Issue digital Voter Authority Certificates as well as printed versions.

#### **Recommendation 14a**

If Recommendation 14 is implemented, consider the merits of moving the Voter Authority Certificate application deadline closer to polling day.

#### **Recommendation 15**

Introduce a statutory deadline for determining Voter Authority Certificate applications before a poll.

#### **Recommendation 16**

Extend replacement Voter Authority Certificate provisions to any elector who applied in the previous 28 days but has not received it, regardless of when it was issued.

## **Electoral Registration Officer portal**

From October 2023 the ERO portal a UK Government Digital Service (GDS) product - supported electors applying online for an absent vote at reserved polls. As electoral registers are held locally, EROs download data to their local electoral management systems (EMS) once the absent vote has been determined.

The ERO portal was released without end-to-end testing, greatly adding to EROs' burden for major polls in 2024, and for areas running local by-elections and referendums from October 2023.

An Agile iterative approach has been employed, but the portal's functionality is still far from where electoral administrators need it to be. GDS has listened to sector calls for improvement, making helpful changes to front-end user journeys and messaging. It has also tried to introduce vital functionality. However, significant development is still urgently required, as well as a review of messaging effectiveness.

#### **Recommendation 17**

UK Government to engage with electoral administrators and continue to develop the ERO portal functionality and front-end user journeys at pace.

# Abuse and intimidation

The 2024 UKPGE saw rising levels of abuse and intimidation aimed at candidates, campaigners, EROs, ROs and their staff.

The Elections Act 2022 introduced a new penalty for intimidatory behaviour towards candidates and campaigners.

On 14 October 2024, the House of Commons approved the establishment of a Speaker's Conference to "examine the threat levels against candidates and MPs and the effectiveness of the response to such threats"[8].

We have previously recommended extending legislation to include ROs, EROs and their staff. Not to do so would be unconscionable given the experiences they have suffered in recent years.

We also call on all stakeholders to act on reports of abuse and intimidation and bring prosecutions wherever justified.

#### **Recommendation 18**

Extend respective legislation and penalty for intimidatory behaviour to cover Returning Officers, Electoral Registration Officers and their staff.

## Impact on demographic groups

Elections Act changes have at times resulted in some groups facing unintended challenges to being able to vote. For example, the limit on how many applications each year a person may attest for absent vote and VAC applications, combined with new identity verification requirements, had negative impacts for some care home residents.

#### **Recommendation 19**

Review the impact Elections Act provisions have made to different demographics in society and where required, review legislation to remove barriers to voting.



## **Other election considerations**

## Nominations

### Supporting people to stand

Our members want candidates to stand for election, and to be able to help everyone navigate the nomination process on an equal basis. Many potential candidates see the process as outdated.

Most elections require a physical nomination paper, signed by a specific number of supportive 'subscribers' who meet certain criteria. These papers must be hand delivered, sometimes with a deposit[9].

We believe the entire system needs review.

### Forms

At most elections, standing as a candidate requires several forms to be completed. These can include[10]:

- nomination form
- home address form
- consent to nomination
- certificate of authorisation
- request for party emblem
- notification of election agent.

All requirements should be reviewed to make the process simpler, less repetitive, more streamlined and ideally, allow for online submission.

### Identification

The 2024 UKPGE saw concerns raised about candidate validity in some cases[11]. Extending identification requirements to candidates appears at first to be an easy way of bringing trust and transparency to the system.

However, it is a long-established principal established by case law[12] that ROs must accept nomination papers at face value. Electoral Commission guidance is also clear this is the case. Any discussion around introducing candidate ID requirements must consider the:

- Face value principle currently applied to nominations
- Role of the RO and powers they have
- Barriers any ID provisions may introduce to submitting nominations
- Timetable implications if ROs are required to make ID checks after the close of nominations
- Interaction with commonly used name requirements
- Requirements proving a connection to an address
- Impact on all types of poll, including scheduled elections with thousands of local government candidates at principal and parish/community council elections.

#### Subscribers

There are no subscriber requirements for devolved polls in Scotland and Wales. We therefore question the need for candidates to have nomination papers subscribed at other elections. While we appreciate concerns that subscribers act as a barrier to fraudulent nominations, there has been no indication of this at devolved polls. Removing the requirement would simplify the nomination process and more easily enable online submissions.

Deposits required to stand as a candidate for different types of elections vary significantly. We believe deposits across all polls should be reviewed.

### Hand delivery

Except for Welsh principal area and community council elections, legislation requires candidate nomination forms to be delivered by hand. This creates participation barriers and may prevent potential candidates standing for election.

#### **Online nominations**

Online nomination submissions for Welsh local elections have been in place since 2022.

While most Welsh authorities limit e-delivery to email, one RO introduced a portal to maximise the new policy's benefits.

We believe online nomination submissions should be extended to all polls in Britain, with online nomination portals integrated into EMSs. This would meet candidate expectations and reduce burdens on ROs.

#### **Recommendation 20**

Make provision for all candidate nomination papers to be submitted online via a UK-wide and government funded portal integrated into local electoral management systems.

#### **Recommendation 21**

Expand hand delivery provisions for nominations to include allowing any candidate-authorised person to hand deliver nomination papers at all elections.

#### **Recommendation 22**

Electoral Commission to review all forms used as part of candidate nomination at all elections.

#### **Recommendation 23**

Simplify the nominations process by removing the requirement for electors to sign each nomination.

#### **Recommendation 24**

Review candidate deposit amounts for all polls where they are required.

#### **Recommendation 25**

Consider the impact of introducing a candidate ID requirement, reviewing the merits and impacts on candidates, agents, Returning Officers, the election timetable and nominations process.

## **Polling provisions**

We believe current polling provision is detrimental to successful delivery. Polling station processes have become more complex and harder to deliver. Technological advances have been embraced for electoral registration but are shied away from on polling day.

The legal requirement for every polling district to have a polling station resulted in 38,812 polling stations for the 2019 UKPGE[<u>13</u>]. It is increasingly difficult for ROs to find suitable venues and sufficient staff to work in them for a 15-hour+ day at little more than minimum wage.

The Elections Act 2022 introduced increasingly complex polling station processes. Competent and knowledgeable staff are needed to confidently and consistently deliver them, but they are becoming harder to recruit and retain. Barriers to staffing include the length of polling day, the technical knowledge needed, levels of pay and changing attitudes following the COVID-19 pandemic. How electors choose to vote has changed dramatically in the last 30 years. At the 1992 UKPGE, just 2% of valid votes were cast by post. In 2010 that number rose to 18.8%[14]. Data supplied to us by the Electoral Commission for the 2024 UKPGE shows the number has now reached 26.2%. Postal voting doesn't increase voter turnout, it has just changed chosen voting methods. UKPGE turnouts were 77.7% in 1992, dropping to 65.1% in 2010 and 60.4% in 2024.

This change in voting methods has not prompted a re-evaluation of in-person voting requirements. If anything it has led to greater burdens, including polling hours for local elections being extended by two hours.

We believe a full review of polling provisions is urgently needed, with a view to mitigating current risks and reconsidering how electors want to access the ballot box. Action should be taken to modernise and futureproof processes, bringing benefits for all involved.

We believe a full review of polling provisions is urgently needed, with a view to mitigating current risks and reconsidering how electors want to access the ballot box. Action should be taken to modernise and futureproof processes, bringing benefits for all involved. POLLING STATION

Excluding e-voting, which we do not believe should be the first stage of any modernisation agenda, areas for consideration should include:

**Shortening polling hours:** compared to other European countries, the UK has some of the longest polling hours, despite being in a minority of countries offering postal voting on demand and generous proxy provisions[15].

Weekend voting: most European countries vote at the weekend[16]. This could help both staffing and venue availability at UK polls. Schools could be used without disrupting education, for instance.

## Removing the requirement for a polling station in every polling

**district:** reducing the number of required polling stations is key to addressing many current issues. We support a move towards larger voting hubs at fewer polling locations. These could be in areas electors are more likely to be, such as shopping centres and supermarkets. Allow electors to vote anywhere in the local authority area: embracing technology could dramatically increase electors' options of where they can vote. Tablet use in polling stations is increasing year-on-year, helping support staff deal with growing complexities and bringing efficiencies and safeguards to the voting process. With the right support infrastructure, polling station technology could bring many benefits.

**Early voting:** while historically, early voting does not increase turnout, it could offset some of the risk of moving to voting hubs, offering an alternative to postal voting.

#### **Recommendation 26**

Carry out a full review of current polling provision, including polling hours, weekend voting, voting hubs and how technology could benefit polling processes.

## Other polls

### Neighbourhood Planning Referendums (NPRs)

The 2012 Neighbourhood Planning (Referendums) Regulations introduced NPRs and Business NPRs in England. These gauge electors' opinions on a neighbourhood plan, neighbourhood development order or community right to build order.

While the motivation remains commendable, the reality is NPRs are almost always characterised by low turnout and huge majorities voting in favour. Given these characteristics, we question if the cost to the public purse and administrative burden on local government staff achieves what was intended.

With no centralised database of local byelections and referendums, there is no definitive figure for the number of NPRs held each year.

**Business Improvement Districts (BIDs)** 

Business Improvement District Regulations for England, Scotland and Wales do not provide a clear framework to deliver the various processes. The regulations allow for a great deal of interpretation where prescription would be more effective.

Equally, aspects of BID regulations directly conflict with key election law provisions. This is unhelpful and confusing for everyone involved. Our members have helped us collate the following data since July 2021:

Year	NPRs logged
2021 (July - Dec)	53
2022	108
2023	107
2024	82

It is likely the total number is even higher.

#### **Recommendation 27**

Consider abolishing administratively burdensome and costly Neighbourhood Planning Referendums in England.

That the UK Government has issued two different sets of technical guidance alongside the regulations demonstrates the legislation is lacking.

#### **Recommendation 28**

Review and redraft Business Improvement District regulations for each nation to bring clarity and certainty to how ballots are run.

### Parish polls

In England, parish polls are a non-binding ballot of local electors on a question affecting a parish.

Parish poll rules are massively outdated and deviate drastically from standard modern polling processes, including voter ID and accessibility provisions. Parish polls are a costly consultation method[17] usually characterised by low turnout. Previous UK governments have identified issues with parish polls but made no rule changes[18]. In Wales, with the exception of community governance polls, community polls consequent on a community meeting were abolished from 5 May 2022[19].

We believe UK Government should follow Welsh Government in abolishing parish polls consequent on a parish meeting.

#### **Recommendation 29**

Abolish outdated non-binding parish polls in England.

## **Electoral Commission role**

To better support EROs and ROs at all polls they are responsible for, we believe the Electoral Commission's remit should be updated and expanded.

Due to increasing ambiguities, this should include providing support and guidance on BIDs, NPRs, parish polls (if retained) and parish and community council elections.

#### **Recommendation 30**

Extend the Electoral Commission's remit to provide support and guidance for all statutory polls and referendums held in Britain.

"To better support EROs and ROs at all polls they are responsible for, we believe the Electoral Commission's remit should be updated and expanded."

## **Recall petitions**

Since the Recall of MPs Act 2015 was implemented, five recall petitions have been initiated in Britain. Four resulted in successful recall, the fifth was terminated early due to the sitting MP resigning their seat[20].

Considering this, we question whether recall petitions are the best option for removing MPs.

For example, should the disqualification criteria for holding office simply include the three current triggers[21]? Automatic disqualification removes the administrative burden for Petition Officers and cost to the public purse. To date it also ends with the same result – an MP losing their seat and triggering a UK Parliamentary by-election.

If recall petitions remain in place, we believe petitions should end as soon as the threshold of 10% of registered electors signing is reached. Evidence shows most electors tend to sign early in the process. For example, at the Peterborough, Rutherglen and Hamilton West, and Brecon and Radnorshire recall petitions, the threshold was met within a fortnight[22]. Once a petition has the required number of signatures, we fail to see the point in continuing at significant financial and administrative cost where the outcome is already known.

#### **Recommendation 31**

Abolish recall petitions and instead legislate for an MP's automatic disqualification from office based on the three recall triggers in the Recall of MPs Act 2015.

#### **Recommendation 32**

If recall petitions remain in place, amend the current fixed six-week timeframe to immediately end if the 10% electorate threshold is reached.

## **Electoral timetable**

We have previously called for an extended 30-day electoral timetable, to reduce risk and increase capacity.

UK and Welsh Governments have to date been hesitant to consider an extension due to the constitutional impact. However, Scottish Government has extended the Scottish Parliamentary timetable up to 35-working days.

While we still believe extending the timetable to 30 days would be beneficial to everyone involved in the electoral process, there is also merit to reviewing deadlines within the current timetable and messaging around those deadlines to electors.

### Nomination deadline

Within the current 25-working day timetable, we do not believe the benefit of an earlier nominations deadline would outweigh the potential impact. For local elections, particularly areas with all-out elections and parish, town and community councils, an earlier deadline may increase risk due to the volume of nominations involved needing to be processed in a shorter timeframe.

However, we think reverting to a 12:00 deadline from 16:00 would be beneficial. Moving the deadline to 12:00 allows ROs and print suppliers sufficient time to produce, check and sign off ballot paper proofs the same day, allowing postal votes to be despatched sooner.

#### **Recommendation 33**

Legislate for an extended 30-day electoral timetable for all polls, increasing capacity and resilience.

#### **Recommendation 34**

Change nomination deadlines from 16:00 to 12:00 for all polls to allow ballot proofing to take place earlier and postal votes to be despatched sooner.

### Absent vote deadlines

Our recommendations about absent vote deadlines are already included elsewhere in this Blueprint. These are:

- Change the postal vote deadline for all polls in Britain to 17:00 16-working days before the poll.
- Introduce a statutory deadline for determining absent vote applications before a poll.
- Legislate to allow Returning Officers to legally issue postal votes to newly registered electors prior to the objection period expiring for their registration application.
- Amend legislation to allow a postal vote to be reissued when a Returning Officer is satisfied it is lost or undelivered.
- Where a Returning Officer is satisfied a postal vote has not been received, governments to consider the merits and challenges of allowing the elector to cancel it and either vote in person or appoint a proxy.

#### **Registration deadline**

Any postal vote deadline is intrinsically tied to the registration deadline. We recommend the 5-day objection period for registration applications be scrapped. This will prevent the subsequent lag in determining absent vote applications.

If the postal vote deadline is before the registration deadline, the current registration system limits the benefits of an earlier postal vote deadline for new elector registrations. Equally, if the registration deadline is after the postal vote deadline, it restricts voting options for electors registering in the period between both.

We believe the registration deadline should either be before or at the same point as the postal vote deadline, enabling all eligible electors to apply for a postal vote.

#### **Recommendation 35**

Change the registration deadline for all polls in Britain to 17:00 16-working days before the poll to align with the recommended postal vote deadline (Recommendation 2).

#### **Elector messaging**

While deadline changes should help mitigate risk and bring capacity, this needs to be coupled with clearer elector messaging.

Electoral Commission communications rightly highlight the need to apply by each application deadline. However, we believe the overriding message could benefit from behavioural science and communication expertise to shift messaging towards "act now" rather than "apply by the deadline".

These communications would be supported by the localised GOV.UK messaging we have called for in Recommendation I, reinforced by communications work at administering local authority level.

#### **Recommendation 36**

Electoral Commission to redesign registration and absent vote communications and messaging to encourage early applications and better inform absent voting option decisions.

## **Electoral registration**

Village Hall

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## Improving voter registration

The current system of voter registration is not perfect – with EC research showing around 8 million people not registered at their current address [23].

Under-registration is more common among younger people, private renters, recent home-movers and underrepresented ethnic minorities[24].

We welcome the UK Government's commitment to improve voter registration with learning from the automatic voter registration (AVR) pilots in Wales.

### **Open register**

We have long called for the open register to be abolished, ending the sale of elector details to undefined third parties.

Welsh Government's move to AVR has resulted in them removing the open register for devolved polls, introducing additional safeguards for young and vulnerable people. To remove confusion for Welsh electors and prevent any elector details being available for sale to undefined third parties, we believe all governments should abolish the open register.

**Recommendation 37** Abolish the open electoral register across Britain.

#### Selling the electoral register

Fees for buying the electoral register are low in comparison to the costs of producing it. The current statutory fees for the full and open versions of the electoral register have not been reviewed or changed since they were introduced almost 25 years ago[25].

EROs raise a small amount for local authorities from selling the full register, usually to credit referencing agencies. They rarely sell the open register.

Credit reference agencies can make a significant profit from full electoral registers sold to them for a low statutory fee. Agencies use the data in credit checking reports for the financial industry and others, and sell on data from the open register.

We believe a more appropriate fee structure should be charged, representing the true costs of producing the electoral register. This does not have to be profit-making, but it should be cost neutral.

#### **Recommendation 38**

Review fees for selling the full register to accurately reflect costs incurred by the public purse for compiling the register, not just the cost of supply.

#### Second registrations

Legislation allows for some people to register in more than one place, but the law does not define what constitutes a valid second registration. EROs are required to make individual judgements on whether residency requirements are met.

#### **Recommendation 39**

Review legislation that allows second registrations for students and second homeowners. If allowed to continue, amend the law to clearly define residency and what constitutes a valid second home.



### **Coordinated online record of electors**

In 2006, the then Labour Government legislated to establish a Coordinated Online Record of Electors (CORE) to centrally store electoral registers.

In 2011, the then Coalition Government decided not to pursue the system, stating "We do not believe that establishing this system is proportionate, cost-effective or consistent with the Government's policy on databases and reducing the number of non-departmental public bodies."[26]. The legal framework was repealed by the Electoral Registration and Administration Act 2013. More coordination is needed to take full advantage of improving voter registration and implementing other fraud prevention measures such as proxy eligibility checks. This should include the centralised storage of locally maintained electoral registers, or the development of a mechanism to link each ERO's register.

#### **Recommendation 40**

Consider the merits of linking or centrally storing electoral registers to support improving voter registration, help limit applications from already registered electors and strengthen fraud prevention.

### **Electoral registration**

#### The annual electoral registration canvass

The introduction of electoral registration canvass reform in 2020 was designed to make the annual process more efficient. The Electoral Commission's '<u>Electoral</u> <u>registration in Great Britain in 2023</u>' report found no evidence of any significant impact on electoral register quality from canvass reform. Equally, there has also been no significant improvement.

The biggest impact appears to be on the number of registered attainers. Numbers have declined since individual electoral registration was introduced in 2014. This situation has significantly worsened since 2020's canvass reform[27].

With registration now largely driven by electoral events [28], we question if the annual canvass process merits the time and cost burdens it puts on EROs.

Alternative options should be explored, such as:

- Using household notification communications to outline who is registered at a property prior to scheduled electoral events.
- Sending empty property poll cards ahead of a poll.
- Mirroring the Northern Ireland system and only requiring EROs to canvass households every ten years[29].
- Use of automatic, integrated, assisted and signposted registration as recommended by the Electoral Commission to replace the canvass or frequency of the canvass in Britain[<u>30</u>].

#### **Recommendation 41**

Fully review whether the annual electoral registration canvass in Britain adds value, if a yearly canvass is still required and if the current two stage registration process is effective.

### Removing the objection period for new voter registrations

We question the need for an objection period. Welsh Government's automatic voter registration pilots will exclude the objection period where an elector is automatically registered. This allows electors to be added to the next monthly notice of alteration as long as they are automatically registered the day before the notice is published.

#### **Recommendation 42**

Review whether to continue with the electoral registration objection period and 14-calendar days for monthly alterations.

#### **Elector communications**

Current statutory registration communications can appear excessive and an unnecessary burden to the public purse.

For example, when an ERO is notified an elector has moved address, without a second piece of evidence, EROs are required to carry out a review before removing that elector. This entails posting a review notice to the elector at the address they have moved from. This tells the elector the ERO no longer believes they are entitled to register, and if a hearing is not requested, they will be removed from the electoral register in 14-calendar days. This is an expensive analogue process in a digital world.

#### **Recommendation 43**

Review statutory communication requirements for electoral registration to remove unnecessary bureaucracy and burden on the public purse.

## **Overseas electors**

As already referenced, the 2024 UKPGE highlighted ongoing postal voting capacity and timetable issues. This was particularly stark for overseas postal voters, who need as much time as possible to receive and return their ballot paper.

The current system overpromises and underdelivers. The deadline for applying to vote from overseas and to cast that vote by post is often too late to allow that vote to count.

France approaches voting for citizens living overseas by having overseas constituencies [31]. A similar approach for UK Parliamentary general elections could unlock an improved voter experience.

We also believe messaging for overseas electors needs to be clearer. Any overseas elector who applies after a UKPGE is called may struggle to receive and return a postal vote. Both the UK Government and Electoral Commission need to make sure communications are in place to help manage overseas electors' expectations.

#### **Recommendation 44**

Change the postal vote deadline for overseas electors to 17:00 16-working days before a poll.

#### **Recommendation 45**

Consider the merits and impacts of allowing overseas postal voters to change their voting method to in person or by proxy where the timescale for receiving and returning their postal vote is no longer viable.

#### **Recommendation 46**

Change the registration deadline for overseas electors to 17:00 16-working days before a poll to be the same as the recommended postal vote deadline (Recommendations 2 and 44).

#### **Recommendation 47**

Explore the possibility of creating overseas constituencies to offer an alternative voting option for overseas electors.

#### **Recommendation 48**

UK Government and the Electoral Commission to review overseas elector communications to manage expectations and allow electors to make informed decisions on voting method choices.

# Management, modernisation and oversight

## **Electoral law and processes**

The UK's electoral system continues to become ever more complex. It is increasingly difficult to understand, navigate and administer. Recent changes have bolted 21st century user experiences on to 19th century infrastructure, too often leaving electors frustrated or disappointed.

We have repeatedly called for UK Government to set up an independent Royal or Parliamentary Commission review of core election delivery processes.

We stated in our 2021 Blueprint it was no longer possible to easily navigate the myriad of legislation governing elections and referendums. Since then, the situation has deteriorated further. A large volume of new and amended legislation was introduced by the Elections Act alone. Urgent action is needed to support ROs, EROs and their teams administering elections and electoral registration - for their sake and that of everyone using the system, whether to stand as a candidate or to vote.

A single Electoral Administration Act, which respects devolved nation differences, is needed more than ever. This is especially important given UK Government intentions around voter registration, voter ID and giving 16- and 17-year-olds the right to vote in all elections.

#### **Recommendation 49**

Set up an independent Royal or Parliamentary Commission review of core election delivery processes.

#### **Recommendation 50**

Review all existing electoral law to produce a single Electoral Administration Act which respects devolved nation differences.

#### **Convergence and divergence**

The last decade has seen increasing divergence between UK Government and Scottish and Welsh Governments on electoral processes.

The modernisation agendas of the devolved governments, coupled with the Elections Act, has led to EROs, ROs and administrators in Scotland and Wales delivering polls with different franchises, processes and rules.

This legally-mandated inconsistency of approach makes it difficult for ROs, electoral administrators and suppliers, as well as being confusing for the electorate.

More changes are coming in Wales. While we are generally supportive of the motivation for these changes, they bring further challenge.

Introducing AVR for local government registers could lead to electors failing to register for reserved polls and subsequently finding themselves disenfranchised. It also adds to ERO burdens as the paper heavy Invitation to Register process is still required for reserved polls.

Moves to abolish the open register are limited if the UK Government does not take the same approach. The intention to introduce postal vote correction from the 2026 Senedd elections will increase differences between devolved and reserved polls. It could also place a significant administrative burden on ROs.

We are also concerned proposals have not been piloted, meaning implications and inadvertent knock-on effects are not fully known.

#### **Recommendation 51**

UK and devolved governments to work collaboratively on electoral matters to limit, wherever possible, the divergence in practice for different electoral events.





### Full review of electoral funding and funding mechanisms

A full review of all electoral funding and funding mechanisms should be carried out as a matter of urgency.

For years we have called for a funding review. Funding must be clear and transparent, showing funding amounts given to local authorities and ROs to administer electoral services.

Particular attention is needed around event-led registration costs. The 2024 UKPGE saw significant numbers of people register to vote late in the process, with 629,878 applications on registration deadline day alone[32].

EROs were also grappling with processing overseas elector applications, plus a significant number of UKPGE-specific absent vote applications. For example, 196,618 postal vote applications were made on deadline day and the day before[33]. This has been an issue for all national elections since IER was introduced in 2014. While these registration and absent vote applications were principally caused by a national poll, under current arrangements costs must be met by the ERO and local authority, not central government funding.

We believe a fairer system would make central government funding available for additional registration costs which occur as the direct result of a nationally-funded poll.

#### **Recommendation 52**

Review all electoral funding and funding mechanisms as a matter of urgency, to provide transparency for local authorities, Electoral Registration Officers and Returning Officers.

### **Recommendation 53**

Introduce a mechanism to fully reimburse national electoral event registration costs incurred by local authorities and Valuation Joint Boards.

### **Returning Officer's remit**

ROs are independent statutory postholders. We believe ROs should be able to make their own decisions based on local circumstances to provide for the safe delivery of an election.

Boundary reviews have increased the number of cross-boundary UK Parliamentary constituencies. Geographical limitations, coupled with the return of truly snap UKPGEs and the effect on count venue, staffing availability and seasonal weather, mean ROs should be empowered to decide when to run their counts based on local circumstances.

The requirement at UKPGEs for ROs to begin counting votes within four hours of the close of poll is overly prescriptive.

#### **Recommendation 54**

Grant Returning Officers the ability to decide when to run their counts, for all types of election, without restrictions from legislation or interference from third parties.

### **Electronic Writ**

Current arrangements to receive and return a UK Parliamentary Writ are paper based and involve personal delivery by Royal Mail.

Each RO is required to make arrangements to receive a Writ as soon as practicably possible and to return it the morning after polling day.

The system is cumbersome and unnecessary in the digital age. Writ receipt and return should be digitised.

#### **Recommendation 55**

Introduce an electronic system to deliver, receive and return Writs at UK Parliamentary general elections and by-elections.

## **Candidate booklets**

At Police and Crime Commissioner elections, candidate addresses are available online, with a print version available on request.

We believe similar provisions should apply to all polls where a candidate booklet is required, removing the need for a printed version to be sent to every household or elector.

If this is not implemented, it is imperative legislation for polls requiring a printed candidate booklet to be sent to every elector be amended to every household instead, reducing the cost to the public purse.

### **Recommendation 56**

Amend legislation to remove the compulsory requirement for printed candidate booklets to be sent to every household/elector at certain polls.

#### **Recommendation 56a**

If the compulsory requirement for printed candidate booklets is not removed, amend legislation to require printed candidate booklets to be sent to each household, not each elector, in the interests of the public purse.

### Supplier capacity

The UK's electoral supplier market is small. It has taken on substantial change in recent years, helping election teams implement new legislation and regulations. Suppliers' ability to support any additional proposed electoral change must be seriously assessed.

- EMS suppliers need sufficient time to incorporate legislative changes, and national digital services, into their products.
- The Electoral Commission should engage directly with EMS providers and print suppliers on form design.
- An increase in cross-boundary constituencies needs cooperation across all EMS providers to make sure all systems work effectively.
- The impact of Royal Mail modernisation plans[<u>34</u>] must be considered and, wherever possible, mitigated against.

### **Recommendation 57**

Conduct a review of supplier capacity to identify and mitigate against potential risk.

# Appendix A

# European countries polling day and hours comparison

Based on the 2024 European Parliamentary elections

Country	Polling day	Polling hours	Duration
Austria	Sunday	7:00 – 17:00	10 hours
Belgium	Sunday	8:00 - 14:00	6 hours
Belgium	Sunday	7:00 – 20:00	13 hours
Croatia	Sunday	7:00 – 19:00	12 hours
Cyprus	Sunday	7:00 – 18:00	11 hours
Czech Republic	Friday & Saturday	Fri 14:00 – 22:00 Sat 8:00 – 14:00	8 hours 6 hours
Denmark	Sunday	9:00 - 20:00	11 hours
Estonia	Sunday*	9:00 - 20:00	11 hours
Finland	Sunday**	9:00 - 20:00	11 hours
France	Sunday	8:00 - 18:00	10 hours
Germany	Sunday	8:00 - 18:00	10 hours
Greece	Sunday	7:00 – 19:00	12 hours
Hungary	Sunday	6:00 - 19:00	13 hours
Ireland	Friday	7:00 – 22:00	15 hours
Italy	Saturday and Sunday	Sat 15:00 – 23:00 Sun 7:00 – 23:00	8 hours 16 hours

Country	Polling day	Polling hours	Duration
Latvia	Saturday	9:00 - 20:00	11 hours
Lithuania	Sunday	8:00 - 20:00	12 hours
Luxembourg	Sunday	8:00 - 14:00	6 hours
Malta	Saturday**	7:00 – 22:00	15 hours
Netherlands	Thursday (for EU)	7:30 – 21:00	13.5 hours
Poland	Sunday	7:00 – 21:00	14 hours
Portugal	Sunday**	8:00 - 20:00	12 hours
Romania	Sunday	7:00 – 22:00	15 hours
Slovakia	Saturday	7:00 – 22:00	15 hours
Slovenia	Sunday	7:00 – 19:00	12 hours
Spain	Sunday	9:00 - 20:00	11 hours
Sweden	Sunday	9:00 - 20:00	11 hours

\*online voting available from Monday – Saturday before polling day \*\* early voting also available

# **Appendix B**

Number of attainers on the parliamentary register in Great Britain 2013 – 2023

Year	Attainers	% change
2023	177,365	3.23%
2022	171,808	-0.23%
2021	172,203	-28.70%
2020	241,427	-21.00%
2019	305,497	-2.10%
2018	312,182	-4.00%
2017	325,243	-4.30%
2016	339,734	23.00%
2015	276,185	-10.30%
2014	307, 864	-33.30%
2013	461,350	N/A

Source – Electoral Commission's Electoral registration in Great Britain in 2023.

# Appendix C

## French overseas constituencies

Constituency	Region	Number of countries that make up constituency	Registered voters (2024)
First	Canada and the United States	2	259,288
Second	Mexico, Central America, the Caribbean and South America	33	88,577
Third	British Isles, Northern Europe, Greenland and Baltic States	10	175,997
Fourth	Belgium, Netherlands and Luxembourg	3	174,164
Fifth	Andorra, Monaco, Portugal and Spain	4	110,460
Sixth	Liechtenstein and Switzerland	2	169,166
Seventh	Germany, Austria and Eastern Europe	16	129,011
Eighth	Southern Europe, Israel and Palestinian territories	8	145,883
Ninth	Maghreb	16	155,611
Tenth	Central, Eastern and Southern Africa, Much of the Middle East	48	146,969
Eleventh	Belarus, Ukraine, Russia, Moldova, Oceania, most of Asia	49	137,852

# Endnotes

Page	Endnote
8	I. <u>Electoral Commission UK general election 2024 supporting data</u>
<u>9</u>	2. Working days are defined as not being a Saturday, Sunday, Christmas Eve, Christmas Day, Good Friday, a bank holiday or a day appointed for public thanksgiving or mourning.
<u>14</u>	<ul> <li>3. A proxy is an arrangement where another person votes on an elector's behalf at their polling station, or by post where the proxy applies in time to the relevant ERO.</li> <li>4. The deadline to make a change to existing proxy and postal proxy arrangements is 17:00, 11-working days before the poll. However, if an elector submits a new proxy application by 17:00, six-working days before the poll this will supersede the existing application.</li> </ul>
<u>16</u>	<ol> <li><u>Electoral Commission 'Voter ID at the 2024 UK general election' report</u></li> <li><u>The Voter Identification (Amendment of List of Specified Documents)</u> <u>Regulations 2024</u></li> <li><u>GOV.UK Guidance: Enabling the use of digital identities in the UK</u></li> </ol>
<u>19</u>	8. House of Commons Library Speakers' Conferences Research Briefing
<u>20</u>	<ul> <li>9. For principal area and parish council in England require two subscribers, UKGPE require ten subscribers, local authority mayoral elections in England require 30 subscribers, Police and Crime Commissioner elections require 100 subscribers, Combined Authority Mayoral elections require 100 subscribers with at least 10 electors from each constituent council within the combined authority area and the London Mayoral election requires 330 subscribers with at least 10 electors from each constituent size and the London Borough.</li> <li>10. For example, see Rules 6-8 of the Parliamentary Election Rules (Schedule 1 to the Representation of the People Act 1983).</li> <li>11. BBC News reports covering candidates with the same name standing in multiple constituencies and <u>conspiracy theories about fake candidates</u>.</li> <li>12. Greenway Stanley v Paterson [1977] 2 All ER 63; R v An Election Court ex parte Sheppard [1975] 1 WLR 1319.</li> </ul>
22	<ul> <li>I3. <u>Electoral Commission UK general election 2019 supporting data</u></li> <li>I4. <u>House of Commons Library "'First Class the Post': The Rise of Postal Voting"</u></li> </ul>
23	<ul> <li>15. See Appendix A – postal voting on demand only applies to England, Scotland and Wales. In Northern Ireland a permanent postal vote can be applied for with a valid reason. Temporary postal votes can be applied for only in the run up to an election where the person is away from home.</li> <li>16. See Appendix A</li> </ul>

Page	Endnote
<u>25</u>	<ul> <li>17. A survey of 150 parishes found polls cost in the region of £5,000 to £8,000: Figures from 2012 Society of Local Council Clerks survey.</li> <li>18. <u>Department for Communities and Local Government 2014 parish polls</u> <u>consultation</u></li> <li>19. <u>Section 162, Local Government and Elections (Wales) Act 2021</u></li> </ul>
<u>26</u>	<ul> <li>20. A recall petition in North Antrim, Northern Ireland in 2018 did not attract the required number of signatures to recall the sitting MP.</li> <li>21. The three triggers include - Conviction in the UK of any offence and sentenced or ordered to be imprisoned or detained, after all appeals have been exhausted; Suspension from the House following report and recommended sanction from the Committee on Standards for a specified period (at least 10 sitting days, or at least 14 days if sitting days not specified); Convicted under section 10 of the Parliamentary Standards Act 2009 (making false or misleading Parliamentary allowances claims).</li> <li>22. Electoral Commission report into 2023 Rutherglen and Hamilton recall petition; Electoral Commission 2019 review of 2019 recall petitions</li> </ul>
<u>29</u>	<ul> <li>23. <u>2023 Electoral Commission report: Electoral registers in the UK</u></li> <li>24. <u>Electoral Commission registration data</u></li> </ul>
<u>30</u>	25. Regulations 110 and 111 of the Representation of the People (England and Wales) Regulations (RPR) 2001; Regulations 110 and 111 RPR (Scotland) 2001: Data: £20 + £1.50 per thousand entries (or part); Paper: £10 + £5 per thousand entries (or part).
<u>31</u>	26. Hansard 18 July 2011: Co-ordinated Online Record of Electors
<u>32</u>	<ul> <li>27. See Appendix B</li> <li>28. From the point the 2024 UKPGE was called (22 May) to the registration deadline (23:59 18 June), 2,898,352 applications were made to register to vote.</li> <li>29. In Northern Ireland, Section 10ZA of the Representation of the People Act 1983 only requires a full canvass every ten years. In intervening years, the Chief Electoral Officer for Northern Ireland must recommend to the Secretary of State for Northern Ireland by 16 April each year whether an additional canvass should be conducted.</li> <li>30. Electoral Commission report: Electoral registration in Great Britain in 2023</li> </ul>
<u>34</u>	31. In reference to recommendation 47 – overseas constituencies are currently used in 17 countries, including Croatia, France, Italy, Lithuania, North Macedonia, Portugal and Romania. France has 11 overseas constituencies ( <u>see Appendix C</u> ), each returning one member to the French National Assembly. As of 2024, the constituencies represented almost 1.7m French voters. The aim is for expatriates to be represented as such, rather than vote remotely for a constituency on French territory.
<u>37</u>	<ul> <li>32. <u>GOV.UK Register to vote service performance dashboard</u></li> <li>33. <u>GOV.UK Apply for a postal vote service performance dashboard</u></li> </ul>
<u>39</u>	34. AEA response to Ofcom consultation on Royal Mail modernisation



# About the AEA

# Supporting and advising the UK's electoral professionals

Founded in 1987 by a small group of electoral officers keen to share training and support, our Association has grown to become a UK-wide network of over 2,000 members and a trusted name in the electoral sector.

Most of our members are frontline local authority officers, working hard year-round to deliver a 'no-fail' service. We also welcome corporate and affiliate members from the wider electoral and local government sectors.

Drawing on our members' experience and input, we proudly represent the sector at devolved nation and UK levels. We meet regularly with government officials and the Electoral Commission. We respond to Parliamentary consultations, and are invited to give evidence to official committees. We bring the UK's electoral community together at our multi-day Annual Conference. We also run one-day Seminars after major polls and around significant legislative change, keeping members up to date to confidently administer polls and electoral registration.

Our members value the connections they forge through both our events and geographical branches. Covering the devolved nations and English regions, our 11 branches help members create their own local network, meaning help or advice is never more than a phone call away.

Awarding the UK's only qualification in electoral administration, our Foundation Course, Certificate and Diploma are widely recognised and sought after by employers across the sector. Training and support remain at the heart of what we do. Our courses keep members up to date with new developments, introduce topics for newcomers to the profession and keep longer serving members in touch with evolving practice.

Our trusted online polling station staff training is a market-leader. In 2024 alone we trained over 151k staff across hundreds of local authorities for scheduled May polls and the 2024 UK Parliamentary General Election.

In recent years, we've grown our member support offer to supplement our training with an ever-growing resource library. Our members have open access to guidance and template resources written by our in-house experts and published in the members-only area of our website. We also share good practice from those working in local authorities to help other members. Our specialists also run hot-topic webinars, drawing on member case studies as well as external expertise. This is in addition to regular online drop-ins, and our popular member support email advice service.

We deliver a weekly newsletter and quarterly magazine direct to members' inbox, keeping them up to speed on the latest news and information. During UK Parliamentary elections we send daily updates with everything administrators need to support them running their highest profile poll. We also host online forums where members bounce ideas off each other, ask questions and share their expertise.

Our aim is always to set and maintain high standards throughout the sector. Resolutely not-for-profit, our membership fees remain deliberately low. In a challenging financial environment for local authorities, AEA membership remains excellent value for money.



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