It’s time for urgent and positive Government action

The AEA’s review of the 2017 local government elections and the UK Parliamentary general election

September 2017
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EXECUTIVE SUMMARY

It is generally recognised that when the electoral process is administered well, little, if any, of the work that goes on behind the scenes is noticed.

That is how it should be.

Irrespective of the extremely challenging situation presented by the unexpected announcement of the extraordinary UK Parliamentary general election (UKPGE) by the Prime Minister on Tuesday 18 April 2017, the entire electoral community succeeded in delivering safe and secure polls under the most intense pressure.

Before the general election, it was encouraging that Chris Skidmore MP, Minister for the Constitution, recognised the importance of the role of electoral administrators:

“It falls to me to state, for the benefit of the House, our mutual respect, regardless of party politics, for those individuals who work behind the scenes tirelessly preparing for elections. A general election has been called. We have local and mayoral elections in some places on 4 May. When it comes to democracy, as Members of Parliament we are very much actors on a stage, and it is the people behind the scenes who ensure that our democracy is the best it can be and one of the best in the world … As Members of Parliament, we depend entirely upon them and are in their debt.”

That is not to say everything went smoothly and it is fair to report that many electoral administrators, suppliers and partners found things extremely difficult.

However, they collectively rose to the challenge and should be rightly proud of their efforts.

In this, our seventh post-election report, we provide both an account of the issues faced by the electoral community in delivering the May and June polls and offer recommendations for improvements to the electoral framework in the UK.

We do so with the purpose of ensuring that the democratic process in the UK can continue to be delivered safely and securely.

Without positive and urgent action, we are concerned that the many weaknesses and contradictions identified in current systems and procedures will cause the system to further fracture and fail.
The Association strongly supports the principle that the interests of electors should be paramount in the administration of the electoral process. To do so, however, requires input from those who deliver the process on the ground.

We offer our continued support to the Government and other key stakeholders to ensure that the UK’s electoral system remains not only trusted, secure and accessible, but also deliverable.

We make two specific requests of Government:

1. That it positively addresses the issues we, the Law Commissions and the Electoral Commission, have raised, and does not shy away from the more difficult challenges; and

2. That it does so with a greater sense of urgency than has been demonstrated over the last few years.

We look forward to continuing to work with all relevant stakeholders to drive the necessary reforms through.

John Turner
Chief Executive

September 2017
CHAPTER 1: Introduction

1.1. The Association of Electoral Administrators (AEA), founded in 1987, is the professional body that represents the interests of electoral administrators in the United Kingdom. It is a non-governmental and non-partisan organisation and has 1,899 members¹, the majority of whom are employed by local authorities to provide electoral registration and election services.

1.2. Further background on the role of the AEA is set out in Appendix A.

AEA reporting

1.3. Since 2007, the Association has published six reports on the administration of elections and referendums in the UK².

1.4. Each report has focussed on the practical issues of administering the electoral process in the United Kingdom and has made a number of recommendations and suggestions to Governments, the Electoral Commission and other key stakeholders.

1.5. The Association does not comment on the performance of individual Electoral Registration Officers (EROs), Returning Officers (ROs)³, local authorities or their staff. It is also not within the Association’s remit to address issues of voter engagement or matters relating to party and election finance, other than where there is an impact on, or from, the administration of electoral processes.

1.6. The findings and recommendations contained in AEA reports are based on a range of evidence, including real time and post-election reporting from ROs, EROs, electoral administrators and other AEA members. Also included are sources such as Electoral Commission and Cabinet Office guidance and bulletins and correspondence with key stakeholders. Full details of the reporting options utilised on this occasion are set out in Appendix B.

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¹ As at 5 July 2017
² https://www.aea-elections.co.uk/policy-reporting/reports-issues-papers/
³ Throughout this report, the generic term “RO” is used and should be read in the context of the issue being discussed. For purposes of thoroughness, the elections in 2017 were variously presided over by Returning Officers, Acting Returning Officers, Depute Returning Officers, Combined Authority Returning Officers and Local Returning Officers.
1.7. The Government issued its responses to the Electoral Commission’s 2016 post-election reports on 17 July 2017. However, at the time of writing, the Government’s response to the Commission’s post-EU referendum report, which may address some of our 2016 recommendations, has yet to be issued. The fact it remains outstanding over a year after the event is extremely disappointing.

1.8. In the Government’s response to the Commission’s 2016 report, it incorporated responses to some, but not all, of the recommendations we made in our 2016 report. Having accepted that many of the matters we raised require resolution, we are disappointed with a number of its responses as well as the slow progress being made to remedy issues that it has accepted require change.

1.9. In particular, we are frustrated by its apparent reluctance to recognise that many existing electoral processes introduce unnecessary risk, bureaucracy and confusion for electors, candidates, suppliers and electoral administrators.

1.10. In light of our concerns, we have taken the conscious decision to review all of the recommendations previously made throughout this report in order that the Government has a comprehensive view of our recommendations for change.

Format of this report

1.11. We have provided short commentaries on the major issues reported to us throughout 2017.

1.12. Where appropriate, we have then made recommendations following each chapter, which are summarised at the end of the report.

1.13. As outlined above, for completeness, we have also included a number of recommendations carried forward from previous reports which, whilst not directly applicable to this report, we have yet to receive satisfactory responses to.

1.14. Finally, in order to give some context to the wider issues, we have included at Appendix C a selection of comments received from members as part of the general feedback process.

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CHAPTER 2: The pressure of 2017

General background

2.1. Over the last few years, the challenges faced by electoral administrators have increased significantly, testing their ability to continue to deliver electoral services in accordance with legislation and to the standard they all strive for.

2.2. In the last two years alone, against the backdrop of reducing resources in the public sector, the electoral community has completed the transition to Individual Electoral Registration (IER) and delivered UK-wide local elections in May 2016 and 2017, the EU referendum in June 2016 and extraordinary elections to the Northern Ireland Assembly and the UK Parliament in 2017.

2.3. In 2017 alone, in addition to June’s UKPGE, in May there were elections for county councils, unitary authorities, combined authority mayors and local authority mayors in England, local authorities and community councils in Wales and local authorities in Scotland. A raft of casual vacancy elections also occurred across the UK as well as relatively new responsibilities seeing numerous neighbourhood planning referendums, Business Improvement District polls and possible Council Tax referendums.

The challenge of the extraordinary UK Parliamentary general election

2.4. The UKPGE was announced by the Prime Minister on Tuesday 18 April, at a crucial stage of the timetable for the May polls. This unexpected news threw up the unprecedented challenge of making arrangements for the delivery of the UKPGE whilst continuing with the safe delivery of the elections that were taking place on Thursday 4 May.

2.5. With the UKPGE being held so soon after the May polls, there was an obvious overlap in campaigning, introducing confusion for the electorate. In addition, different franchises applied to the two sets of polls, which presented communication challenges with those electors. European Union citizens registered as electors were entitled to participate in the May polls but were then not entitled to vote at the UKPGE five weeks later.
The health and well-being of staff

2.6. The Association has become increasingly concerned for the health and well-being of its members. The complexity of running back to back polls in 2016 and then again in 2017, as well as the new demands introduced by IER, have taken their toll on electoral administrators.

2.7. In previous reports, we have highlighted the reliance of the electoral system on goodwill, dedication to public service and commitment in order to ensure that elections are safely delivered. The sacrifices required by electoral administrators in a year with an unprecedented extraordinary general election have been significant.

2.8. On a practical level, problems arose for those electoral administrators who had booked a holiday to occur immediately after the May polls, not least during the school May half-term week. After the issue was raised with the Cabinet Office, the Minister sensibly agreed that any cancellation fees incurred by core electoral services staff and their direct dependents could be claimed as an election expense, subject to them not being reimbursed through personal holiday insurance.

2.9. It is fair to say that the events of 2017 were exceptional. There have been extraordinary general elections in the past, but the closeness to the May polls and the complexities introduced into the system by IER presented a perfect storm that led to the entire electoral system being closer to breaking point than it has ever been before.

2.10. In such a tight timescale, many electoral administrators struggled to manage the volume of work and the delivery of tasks required to be completed for both polls. The volume of enquiries increased, as did the level of complaints from electors expecting a standard of service that is simply not achievable within the constraints of current legislation.

2.11. The delivery of electoral services is generally administered by small, often relatively junior, teams. Any loss of experienced staff can therefore have a significant impact on the delivery of the service.

2.12. The number of people leaving the profession is significant, with an annual attrition rate over the last three years of some 12% of AEA members alone. We are fortunate that new members are joining at similar rates, but the key factor is that those who have left take with them vital skills and experience.
2.13. Electoral administrators should quite rightly be congratulated on the successful delivery of the polls in May and June. As an Association, we are proud of the unstinting efforts of our members, who worked under intense pressure over an extended period to deliver safe and secure elections in the highly professional manner the electorate and candidates expect and deserve.

2.14. We therefore urge Government and other key stakeholders to take urgent steps to seek effective resolution to the many issues that individually and collectively bring risk to the delivery of safe and secure elections in the UK, before trust in the system is irrevocably damaged and before the effect on those who deliver the process becomes intolerable.

2.15. As an Association, we have already begun to take steps to positively support our members, even though the primary responsibility to do so clearly rests with their employers and Government at large.

2.16. Following the UKPGE, the AEA contracted the Hospital and Medical Care Association to provide free of charge to members access to a confidential counselling service. Experienced counsellors are available to discuss any issue, including coping with stress and anxiety, and to offer completely confidential support and advice at any time.

2.17. The Association has also commissioned a series of training courses for members to help them recognise, acknowledge and address the impact their job may have had on their well-being and mental health. Any surpluses from the running of such courses will be ringfenced to continue to develop services that practically support members’ well-being and mental health in respect of such matters.
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CHAPTER 3: Electoral framework

Basic structural arrangements

3.1. A number of different authorities and organisations are involved in the delivery of electoral services in the United Kingdom, ranging from Government, devolved administrations, local authorities and the police and security services to third party partners such as Royal Mail, electoral management system software suppliers and printers.

3.2. However, it is important to note that the statutory responsibility for the safe and secure delivery of the electoral process rests with the independent EROs and ROs.

3.3. There is an obvious need to ensure that the basic systems that underpin the delivery of the electoral process do not, in themselves, create unnecessary issues for the statutory officers and their administrators. Unfortunately, it has become abundantly clear that, in some areas, such issues do exist.

General legislative arrangements

3.4. The delivery of the electoral process is governed by a myriad of primary and secondary legislation (much of which has been subsequently amended), with the complexity and range of law becoming increasingly challenging for all those involved.

3.5. We have previously highlighted the issue of “bolting” new legislative provisions onto those already in place, and the risk that this brings. Throughout the report, we consider some of the anomalies and omissions we have identified, each of which has the potential to cause confusion and inconsistency and should therefore be addressed.

3.6. The AEA has previously welcomed the Law Commission’s Electoral Law: An Interim Report, specifically supporting proposals that “the current laws governing elections should be rationalised into a single, consistent legislative framework governing all elections”, and “electoral laws should be consistent across elections, subject to differentiation due to the voting system or some other justifiable principle or policy.”

3.7. Our position remains unchanged. We are however extremely disappointed as to the lack of progress being made, not least as in its response to our 2015 report, the Government stated that it “agrees that there could be some benefits to simplifying and bringing together the complex legal framework which governs elections … and the Government is currently working with [the Law Commissions] on the next steps”.

3.8. In addition, the AEA has consistently supported the principle that “…electoral legislation should not be applied to any election held within six months of the new provision coming into force” as recommended by Ron Gould following his independent review of the Scottish local government elections in 2007.

3.9. We fully recognise that the exceptional nature of the calling of the UKPGE meant that key pieces of legislation, such as the Parliamentary Elections (Returning Officers’ Charges) Order 2017, had to be made very late. It was extremely unfortunate however that errors made in that Order then required a replacement Order to be made on 5 June, just three days before the poll, without any prior warning to ROs.

3.10. Of greater concern was that Government, once again, laid legislation for scheduled polls within the six-month window. Those of particular significance were:

- The Combined Authorities (Mayoral Elections) Order 2017, making provision for the conduct of elections for the directly-elected mayors of combined authorities, was only made on 30 January, just over three months before the elections taking place on 4 May; and

- The Local Elections (Principal Areas) (Welsh Forms) (Amendment) Order 2017 and the Local Elections (Communities) (Welsh Forms) (Amendment) Order 2017, making provision for Welsh versions of forms, were made on 8 February, less than three months before polling day.

3.11. This situation is indefensible. Once again, we call on Government to respect the Gould principle and recognise that the laying of legislation as late as three months before scheduled polls is unacceptable.

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Funding

Elections funding – general

3.12. Responsibility for meeting expenses incurred in administering elections depends upon the type of election. Local government elections are funded by the relevant local authorities whereas polls such as those for the UKPGE and Police and Crime Commissioner elections are funded by Government.

3.13. In recent years, the funding of national elections has been based on the provision to each RO of an overall maximum recoverable amount (MRA), allowing, in principle, for greater flexibility to make decisions as to how resources are best spent.

3.14. The funding model is calculated by reference to the settled expenditure at the last equivalent poll, uplifted to take account of changes in factors such as electorates, postal vote numbers, inflation, increases to Royal Mail charges, etc.

3.15. We remain concerned that the existing funding model is flawed and in many respects, we fundamentally disagree with the Government’s position on the definition of what constitutes properly incurred expenditure. Many examples have been reported to us of a general reluctance and/or categoric refusal to accept expenditure that has, in the opinion of ROs (who are ultimately responsible for the safe and secure delivery of elections), been legitimately incurred, e.g. charges for reserve staff when Electoral Commission performance standards require effective contingency arrangements.

3.16. The unexpected nature of the UKPGE presented the Cabinet Office with significant challenges, being required to calculate the MRA funding allocations at very short notice and then make advances to ROs. The Parliamentary Elections (Returning Officers’ Charges) Order 2017 was made on 3 May 2017, with the Northern Ireland Order made on 9 May 2017.

3.17. It is clear that in the circumstances, and accepting that there were some issues in individual cases, Cabinet Office officials generally managed these tasks well.

3.18. In saying that, and as previously referred to, it was extremely unfortunate that just days before the election, there was a need to lay the Parliamentary Elections (Returning Officers’ Charges) (No. 2) Order 2017, which replaced the previous order because of a number of the MRAs being incorrect.
3.19. It is also unacceptable that the fees and charges guidance and expenses forms were not released to ROs until the end of June, some weeks after the poll. Throughout the election period, the Association and its members were advised that the guidance would be issued imminently. For it not to be available until some time after the polls had closed was both disappointing and improper.

Electoral registration funding – general

3.20. Core funding of electoral registration is provided by local authorities in England and Wales, Joint Boards in Scotland and the Electoral Office Northern Ireland in Northern Ireland. In England and Wales, the additional costs incurred by the introduction of IER have been funded by the Cabinet Office through section 31 grants (Local Government Act 2003), with separate arrangements in Scotland. No additional funding is provided in Northern Ireland as IER is currently not the system of registration there.

3.21. It is well known that the financial year for local authorities, along with other public bodies, commences in April each year. However, and although we understand that the IER grant figures for the 2017/2018 financial year had been drafted in advance of the UKPGE, no additional grant funding allocation details were released until late June 2017.

3.22. In the meantime, EROs were expected to continue to carry out their usual daily registration duties and make arrangements for their 2017 annual canvass not knowing what funding they would receive.

Current structure of funding arrangements

3.23. The structure of funding arrangements for electoral services has remained unaltered for many years and does not reflect the significant changes to process since the introduction of rolling electoral registration in 2001 and IER in 2014.

3.24. In summary, local authorities are expected to fund all electoral registration costs through regular revenue streams regardless of the fact that many of those costs are directly driven by electoral events. The fees and charges regime for elections does not permit the recharge of any expenses classed as electoral registration, including the processing of applications to register to vote or for absent voting facilities, even when they occur within the election period.

3.25. We remain disappointed that, despite recognising in its response to our 2015 report that general funding arrangements are an ongoing
issue, the Government has failed to give any further thought as to how to address it.

3.26. Since the introduction of IER, and, in particular, the facility for individuals to apply online (which we welcome), pressures on electoral administrators have intensified both in terms of determining applications, which are arriving later and later in election periods because of the ease of access, and the work needed to seek and check additional evidence for applications that fail verification.

3.27. Once the UKPGE was announced and throughout the election period, there were substantial spikes in registration applications with a significant proportion being duplicates, i.e. made by those already registered. This issue will be discussed further in chapter 5.

3.28. The changes to absent voting legislation in recent years have had a substantial impact on the resources required, in particular with regard to postal voting on demand and the increased use of emergency proxies. Following the announcement of the UKPGE, significant volumes of applications were received for postal votes, proxies and emergency proxies, with the majority driven by the impending election.

3.29. Similarly, the volume of applications to register as overseas electors increased significantly in the run up to the UKPGE. The time and effort needed to process such applications is disproportionate to that required for regular applications and although local authorities are required to resource this process, overseas electors are not entitled to vote at local government elections.

3.30. One other issue that was raised by a number of members is the requirement placed on EROs and their employing local authorities, rather than the RO, to underwrite the storage and retention costs of election stationery post-poll, which has become an issue in light of the number of recent elections and referendums. We question whether the Government is truly meeting its obligations in this respect as such funding is not obvious within the grant settlements made to local authorities.

Auditing and settlement of election expenses claims

3.31. The scrutiny of election accounts for national elections falls into three categories; plain accounts, light touch and full scrutiny. For each relevant election, ROs are required to submit their accounts within six months of the poll. This means that, for the UKPGE, expenses claims must be made by 8 December 2017.
3.32. In our report last year, we highlighted our concerns as to the length of time ROs are being required to wait until their claims are audited and settled. Despite the fact that ROs are complying with the requirements to submit their claims within the six-month period, the Elections Claims Unit (ECU) is not auditing those accounts and settling outstanding balances in a similarly timely manner.

3.33. In its response to our 2015 report, the Government stated that “since the majority [of claims] are received in the days preceding that [six-month] deadline, it will be challenging to complete the scrutiny process within the same financial year as the poll.” We recognise that public expenditure must be fully and properly scrutinised, but do not accept the Government’s reasons for failing to do so in a timely manner. That said, we have amended our previous recommendation that the ECU should settle claims within the same financial year as the poll to reflect a more realistic turnaround time, commensurate with that placed by Government on ROs.

3.34. The relationship between many administrators and the ECU was not helped when the ECU continued to send queries to ROs in relation to claims submitted in connection with the 2016 EU Referendum and Police and Crime Commissioner elections during the run up to the UKPGE, giving RO’s just 14 days to respond. It is quite remarkable that an organisation whose sole purpose relates to the electoral process was unaware of the unreasonable timing of such requests.

3.35. We raised the issue with the Cabinet Office and the Electoral Commission, who then agreed that the deadline for responses to any queries raised would be extended to the end of June. Better coordination at the outset would have avoided such unnecessary angst for those administrators affected.

3.36. The Association was also disappointed to hear that six ROs were required to provide supporting evidence to the National Audit Office during the UKPGE period, despite protestations made on their behalf by the Cabinet Office. Again, better coordination and understanding of the pressures faced by administrators would have been appreciated.
Timetables

3.37. The Fixed Term Parliaments Act 2011 provides when UKPGE’s will be held and requires that the UK Parliament be dissolved 25 working days before a general election. The timetable for local government elections is also generally 25 working days long.

3.38. On the face of it, and as far as the majority of election processes are concerned, the timetable is manageable, but largely because elections are usually scheduled months in advance. However, and particularly in the case of an extraordinary UKPGE, significant risks to the safe delivery of the poll have been introduced by IER processes.

3.39. For example, the deadline for receiving applications to register to vote is midnight, 12 working days before polling day. For the UKPGE in June, this was Monday 22 May. The final scheduled update to the electoral register is then published five working days before the poll, which was Thursday 1 June.

3.40. At UKPGEs, electors living overseas are entitled to register to vote, subject to satisfying specific criteria. To do so, such individuals need to apply to register by the same deadline as “ordinary” applicants residing in the UK and, as with such “ordinary” applications, be subject to a five-day public objection period.

3.41. Although the administration of overseas electors will be covered in detail in chapter 5, we highlight this timescale here as for applications made later in the process, and particularly for those that are not included on the electoral register until five working days before the poll, insufficient time exists for postal votes to be sent abroad and returned in time so that they can be counted.

3.42. There is also inconsistency in various deadlines. The deadlines throughout the entire electoral process vary from midnight to specified times such as 4pm, 5pm and 9pm, introducing unnecessary confusion and practical challenge for all involved.

3.43. In responding to our 2015 report, the Government stated that “the Law Commissions ... recommended a standard legislative timetable. The Government is working with them on the next steps following their report.” We are extremely disappointed that little, if any, progress has been made.
3.44. Although not an extensive issue on this occasion, we have previously highlighted the complexity of timetables at combined polls, caused by the inconsistency of deadlines across the various types of election, together with the need for a review of combined polls, which we repeat in our recommendations.

Polling arrangements

3.45. The current review of parliamentary constituency boundaries had not concluded in time for the UKPGE. However, if Parliament agrees to the recommendations of the four Parliamentary Boundary Commissions, expected by the end of this year, new boundaries will take effect at the next UKPGE, which will introduce a number of further challenges into the process, e.g. with the likely increase in the numbers of cross-boundary constituencies.

3.46. Local authorities, who are politically-elected bodies in their own rights, are responsible for the sub-division of UK parliamentary constituencies into polling districts, and to then designate polling places for each of those districts. We are concerned that the current system allows for political motivations to influence democratic processes.

3.47. Despite the Government’s stance that it sees no need to review the current situation, we remain of the opinion that such administrative tasks should be left to independent EROs/ROs.
### CHAPTER 3 RECOMMENDATIONS

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<th>A single Electoral Administration Act should be brought forward, implementing the Law Commissions’ recommendations to simplify electoral legislation.</th>
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| 2017 – 2 | A full and thorough review of the funding of the delivery of electoral services should be undertaken as a matter of urgency, with the purpose of ensuring that:  
  - All costs properly incurred in the administration of elections, including electoral registration costs directly attributable to the election, are reimbursed to Returning Officers and their employing local authorities; and  
  - All costs properly incurred in delivering electoral registration are automatically provided to local authorities without the need to revert to the justification led bidding process. |
| 2017 – 3 | EROs should be given responsibility for the sub-division of UK parliamentary constituencies into polling districts, and ROs for the designation of polling places within those districts. |
| 2017 – 4 | A full and thorough review of all election and electoral registration deadlines should be undertaken as a matter of urgency, specifically considering those that apply to the registration of electors, overseas electors and absent voting. |
| 2017 – 5 | Expenses claims submitted to the Election Claims Unit should be audited and settled within six months of their receipt. |
| 2017 – 6 | A full review of the combination of polls should be undertaken, considering issues such as which polls should be automatically combined, consideration of the maximum number of polls that should be combined on the same day and the combination of polls for parish and community councils and neighbourhood planning and council tax referendums with UK Parliamentary general elections. |
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CHAPTER 4: Planning, management and performance

Planning and communication

4.1. The elections on Thursday 4 May 2017 were scheduled polls, which enabled advanced planning to ensure their smooth conduct. Coordination, joint working and planning between the various local authorities involved started well in advance, ensuring a consistency of approach.

4.2. However, the unexpected announcement of the UKPGE meant that none of the stakeholders had the benefit of advance planning for that election. This caused significant additional pressure to electoral administrators, the vast majority of whom were already stretched delivering the May polls.

General communication

4.3. One of the key challenges presented to all involved in the electoral process is the need to ensure effective communication channels are in place. During both the May polls and the UKPGE, the Electoral Commission and the Cabinet Office produced information bulletins as required, keeping all informed of key issues as they arose.

4.4. However, in view of the extraordinary nature of the announcement of the UKPGE and the unprecedented challenges presented by its timing in relation to the May polls, the Association identified at an early stage that it could play an important role in assisting its members. A decision was therefore taken at the start of the UKPGE period to issue daily bulletins to members on the key issues and events.

4.5. A dedicated UKPGE webpage was also developed on the AEA members’ website, which contained in one place all Electoral Commission and Cabinet Office bulletins, guidance, legislation, templates, timetables, etc., along with a categorisation list to assist members in locating key information quickly. Feedback has been universally positive, with members welcoming the approach the AEA took to support them.

4.6. During the UKPGE, the Electoral Commission set up a weekly teleconference between all regional ROs, the Cabinet Office, SOLACE and the AEA, which provided the opportunity to share and discuss regional and national issues during the election period. The
Association commends the Commission on the approach taken and the positive nature with which participants approached the teleconferences. This ensured that key issues of concern, such as the ever-changing security situation, could be discussed in an open, sensible and productive manner.

**Performance standards**

4.7. Whilst there were the usual RO performance standards for both polls\(^9\), the Association commends the Electoral Commission for the sensible approach taken in light of the extraordinary nature of the UKPGE. The suspension of the need to supply a project plan to them demonstrated faith in ROs to manage their processes without the need to provide evidence at a critical point in the planning process.

4.8. In Scotland, the approach taken by the Electoral Management Board was to recommend set dates for certain events for the whole of Scotland, e.g. for poll card and postal vote despatch, which appeared to be well received.

**The Electoral Commission website and guidance**

4.9. Generally, the quality of Electoral Commission guidance and resources was excellent and was welcomed by electoral administrators. The Commission should be particularly commended for its efforts in ensuring the supply of the UKPGE guidance and resources at such short notice.

4.10. There were reports that the Notice of Election and Welsh nomination papers contained errors, but they were corrected as soon as they were brought to the Commission’s attention.

4.11. However, and although the Commission reacted quickly in producing the UKPGE guidance, there was one specific issue raised by electoral administrators that needs to be considered.

4.12. The Commission removed some guidance from its website whilst it was being updated. Whilst understandable, it should have been recognised that administrators still needed access to much of it in respect of delivering both scheduled and casual-vacancy local government elections and when commencing their planning for the UKPGE.

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4.13. We are reassured that the Commission has now developed a generic set of guidance for all elections, accessible at all times, with notes to the effect that any associated election-specific guidance is being updated.

**Procurement, outsourcing and managing contractors**

**Printing**

4.14. It is clear that the limited number of print suppliers providing services to the electoral industry were fully employed, and in some cases stretched, as a direct result of the various polls in May and June, with issues compounded due to the polls being so close together.

4.15. Numerous reports were received that in order to cope with demand, print suppliers set very tight and specific deadlines for the provision of data, and specified the despatch dates for both poll cards and postal votes (including overseas) rather than doing so at ROs’ preferred times. There were also reports that because of the short lead-in times to the UKPGE, prices were understandably increased in many cases, something that may cause issues with the final settlement of the accounts in due course.

4.16. This can best be demonstrated where, just three days after the UKPGE was announced, and at an important period in the timetable for the May polls, print suppliers were requiring proofs and data for the production of the UKPGE poll cards.

4.17. The whole industry was once again placed under tremendous pressure. It is clear that both combined polls and back to back polls introduce significant risks to the safe delivery of the process and that a solution needs to be found urgently to ensure sufficient and reliable capacity within the print industry.

**Electoral management software**

4.18. It is clear that, in the main, all electoral management system suppliers performed well. There were several reports of specific software issues, particularly in respect of cross boundary data exports and the capacity of systems to deal with two polls so close together (e.g. different types of absent vote applications for each poll, the storage of images and the export of data, etc.), but we are unaware of any major or catastrophic system failings.
4.19. We do however consider that there is greater scope for the software suppliers to work more closely together to resolve ongoing cross boundary issues, not least as the numbers of cross boundary constituencies are expected to increase following the conclusion of the current parliamentary boundary review.

**Royal Mail**

4.20. As with other stakeholders, the unexpected announcement of the UKPGE presented Royal Mail with a number of differing challenges, the first of which related to administering the delivery and collection of Writs.

4.21. A UKPGE commences only when the RO receives the Writ from the Clerk of the Crown in Chancery. This requires them to return an individual to serve as Member of Parliament for their constituency. Current arrangements for the receipt and return of the Writ are paper-based and involve personal delivery by Royal Mail.

4.22. A RO is required to make arrangements to receive the Writ for their constituency as soon as practicably possible after it has been issued, to complete it following the announcement of the result and to then hand it back to Royal Mail for delivery to the Clerk of the Crown in Chancery.

4.23. Overall, the receipt and return of the Writ went well, even though the UKPGE timetable led to them being delivered on Thursday 4 May, polling day across much of the UK.

4.24. Royal Mail should be commended for the efficient manner in which it approached the task. There were quite understandably some minor communication issues at the outset but each was satisfactorily resolved.

4.25. Having said that, we stand by the recommendation we have previously made that to improve efficiency, a system for the electronic delivery, receipt and return of the Writ should be introduced.

4.26. The main issue of contention with Royal Mail related to the timing of the delivery of postal ballot papers following the polling day sweeps. In previous elections, ROs agreed the timing of deliveries to suit local circumstances. However, for the UKPGE, that timing was set at 9:50pm for all ROs.

4.27. We fielded a number of concerns from members that this was too close to the legal deadline of 10:00pm, took away ROs’ control over
The Association of Electoral Administrators

It’s time for urgent and positive Government action

processes in their own areas and introduced considerable and avoidable risks for the receipt of postal ballot papers. In a number of cases, ROs were required to arrange additional deliveries, at cost, earlier in the evening in order to mitigate such risks and to ensure that postal votes completed by electors were counted.

4.28. There were also numerous issues raised in relation to the performance of Royal Mail at local levels. The performance issues attracting most concern were the apparent non-delivery of poll cards and postal votes, late delivery of the same, timing and effectiveness of the sweeps and the infrequent delivery of returned postal votes to the RO.

4.29. In addition, there were issues in relation to the International Business Response Licence used at the UKPGE, which are covered in greater detail in chapter 6.

4.30. We are however pleased to report that we have already begun working with Royal Mail to address the issues that arose on this occasion.

Staff recruitment and accommodation

4.31. As the May polls were scheduled, steps could be taken to appoint staff and to identify and secure polling stations and count centres well in advance.

4.32. The unscheduled nature of the UKPGE presented an entirely different set of challenges. A number of regular polling and count staff were not available, either due to work or holiday commitments, and there were many instances reported where venues traditionally used as polling stations and count centres were unavailable.

4.33. This resulted in an increase in the number of temporary structures and alternative venues having to be hired at short notice, which is likely to have resulted in increased costs.

4.34. A particular challenge faced in respect of the timing of the UKPGE was that schools and colleges were holding exams, impacting on the availability of accommodation in some cases. In addition, reports were received that despite the legal right of ROs to use publicly-maintained buildings, some Head Teachers and Boards of Governors originally refused to make their accommodation available for use as polling stations through not having sufficient inset days available and having already been closed for the May polls.
4.35. Across most of the UK, these issues were having to be addressed whilst delivering the May elections. Even in areas where there were no polls, members were stretched due to the standing start.

**Counting of the votes**

4.36. At the local polls in May, some RO’s counted overnight whilst others counted during the day on the Friday. In Scotland, the local elections were counted electronically at 32 count centres on the Friday.

4.37. At UKPGEs, legislation specifies that the RO must take reasonable steps to begin counting the votes as soon as practicable and within four hours of the close of poll. This duty relates to the actual counting of the votes and not to the verification process.

4.38. In the vast majority of areas, the UKPGE was a single poll, with no other polls scheduled. Commencing the count within four hours was therefore not an issue for many ROs.

4.39. However, there remains a need to review the four hours’ requirement where polls are combined, as was the case in 2015. It is imperative that the count is conducted as efficiently as possible and that the result is reliable and accurate. We understand the “*cross-party views expressed by Parliament in 2009 to 'save general election night’*” that formed part of the Government’s response to our 2015 report, but the health and safety of core electoral services teams and the RO also need to be considered in such circumstances. It is also important that the verification process is completed accurately and not rushed in order to meet an imposed, and arbitrary, deadline.

4.40. In addition, we have previously recommended that the mandated requirement to count unused and spoilt ballot papers as part of the verification process should be removed to be replaced with a requirement to do so only where the RO considers it appropriate. We stand by that recommendation.

4.41. Optical-recognition counting was administered successfully at the local government elections in Scotland in May and has been used at ordinary elections of the London Mayor and Assembly. We therefore believe there remains a need to review the benefits and issues presented by such electronic forms of counting.
Electoral integrity

4.42. Our previous post-election reports have highlighted several issues that require consideration, including formalising the roles of polling station tellers and the involvement of campaigners in handling and/or assisting in the completion of postal ballot papers.

4.43. The Sir Eric Pickles’ review into electoral fraud made a number of recommendations to Government, which the AEA commented on. The Government subsequently issued its own response and commenced work on considering how to approach the recommendations made.

4.44. The AEA looks forward to continuing to work with partners in ensuring that the integrity of the UK’s electoral systems is upheld.

Security issues and guidance

4.45. During the run up to the May polls and the UKPGE in June, there were several national security incidents, which included the:

- London terrorist attack on 22 March 2017;
- Ransomware cyber-attack on 12 May 2017;
- Manchester terrorist attack on 22 May 2017; and
- London Bridge terrorist attack on 3 June 2017.

4.46. Following the cyber-attack, some local authorities were unable to accept attachments via email due to the possible security threat to local authority IT systems. This impacted on the receipt of postal vote application forms in those areas.

4.47. During the UKPGE period, the security level for the country changed to “critical” (an attack is expected imminently).

4.48. In the circumstances, the Cabinet Office, Electoral Commission and security services handled the situation very capably, with plans being put in place and guidance issued to ROs to ensure the safe conduct of both sets of polls.

4.49. The increased security during the UKPGE highlighted some key issues that warrant further consideration.

4.50. Firstly, under current legislation, a poll can only be abandoned or countermanded in the case of the death of a party candidate or, at
individual polling stations, “where the proceedings at any polling station are interrupted or obstructed by riot or open violence, the presiding officer shall adjourn the proceedings till the following day and shall forthwith give notice to the returning officer”\(^\text{10}\).

4.51. Prior to both sets of polls this year, there were a number of security incidents resulting in the UK national security threat level being raised. This led to obvious uncertainty and confusion as to what would happen were the UKPGE to be attacked.

4.52. We repeat that the work done by the Government, the Electoral Commission and the security services should be lauded, but we do consider that the lack of provisions to either countermand or abandon a poll due to other factors than currently permitted should be urgently considered.

4.53. Secondly, authorised Electoral Commission observers are entitled to attend any polling station or count centre without giving prior notice. Whilst the Electoral Commission issued advice to observers asking them to contact the relevant RO prior to their visit, many did not. In accordance with current legislation, they were entitled to attend which, of itself, can present security issues. The Government is asked to look at these issues urgently.

4.54. Thirdly, the deadline to appoint counting agents to attend the counting of votes is five working days before a poll, which meant that for the UKPGE, it was 1 June.

4.55. We have previously reported that this deadline is too late and does not allow sufficient time for count accreditation to be prepared and, where appropriate, relevant checks to be made by security services. This was a particular issue this year with heightened levels of security.

**Cross boundaries**

4.56. Coordinating across local authority boundaries in UK parliamentary constituencies comprising more than one local authority area or part thereof can be a key factor, adding to the complexity of the elections in areas where this occurred.

4.57. As in 2015, there were 183 cross boundary constituencies. Our 2015 report highlighted issues such as data transfer, software

\(^{10}\) Section 42(1) of the Representation of the People Act 1983
compatibility, timeliness and quality of data, which were reported to us again this year.

4.58. The confusion experienced by electors in cross-boundary areas did not appear to have been as great as previously, mainly because the 2017 UKPGE was a single poll. In 2015, where the UKPGE was combined with local polls, there were reports of great confusion for electors in respect of which local authority to contact when they had a query, UKPGE postal vote packs being sent out at different times to local postal votes and replacement postal vote issues, etc.

4.59. We do however remain extremely concerned about the impact of the current parliamentary boundary review and the increase in the complexity likely to be experienced across the UK at the next scheduled UKPGE.
## CHAPTER 4 RECOMMENDATIONS

<table>
<thead>
<tr>
<th>2017 – 7</th>
<th>Where combined with another poll, the requirement to commence the counting of the votes at a UK Parliamentary election within four hours of the close of poll should be removed.</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017 – 8</td>
<td>The absolute requirement to count unused ballot papers as part of the verification process should be removed to be replaced with a requirement to do so only where the Returning Officer considers it appropriate.</td>
</tr>
<tr>
<td>2017 – 9</td>
<td>An electronic system for the delivery, receipt and return of the Writ at UK parliamentary elections should be introduced.</td>
</tr>
<tr>
<td>2017 – 10</td>
<td>Full examination of the benefits of and issues presented by electronic forms of counting should be undertaken in order to assess effectiveness where it is currently permitted and to consider suitability for use at other types of election.</td>
</tr>
<tr>
<td>2017 – 11</td>
<td>The roles and responsibilities of polling station tellers should be recognised in law.</td>
</tr>
<tr>
<td>2017 – 12</td>
<td>The involvement of campaigners in handling and/or assisting with the completion of postal ballot papers should be prohibited.</td>
</tr>
</tbody>
</table>
CHAPTER 5: Electoral registration

General background to registration processes

5.1. Although IER has modernised elements of the process, the basic structure of electoral registration has remained unchanged for many years.

5.2. Each year, EROs are required to conduct an annual household canvass, issuing and chasing enquiry forms that, in themselves, do not directly generate new registrations as these can only be administered through the receipt of individual applications.

5.3. Canvass pilots were conducted in 2016 and will be carried out again this year by a few local authorities. Minor legislative changes have also been made to introduce more efficient processes, but it is widely recognised that the current situation is unsustainable, not least because of cost.

5.4. We have previously highlighted the difficulties in registering some harder to reach groups. Welcoming the fact that a clause was added to the Higher Education Act 2017 to assist with the registration of students, we encourage Government to actively review the registration of all potential electors from identified harder to reach groups.

5.5. The entire electoral community should be congratulated on the efforts made to ensure that every eligible person was, and continues to be, given the opportunity to register to vote.

5.6. The Electoral Commission published a report in March 2017 on the analysis of the December 2016 elector registers in the UK\(^{11}\). The report highlighted that local government registers had increased by 2.5%, with parliamentary registers increasing by 2.3%. The number of registered attainers had increased by 17.7% on the local government register and 22.4% on the parliamentary register.

5.7. The report also highlighted that the accuracy and completeness of the registers was stable, largely due to the May 2016 polls and the June 2016 referendum, with those electoral events encouraging people to vote.

register rather than there being any inherent efficiency of the registration system in capturing electors’ details.

5.8. EROs continued their registration work ahead of the May polls in an effort to register every eligible person. Many local authorities held their own local registration campaigns and, in some areas, regional registration campaigns were funded by groups of local authorities.

5.9. Further details of the wider voter awareness campaigns undertaken throughout both election periods are outlined in chapter 7 but as background, the Electoral Commission ran a registration campaign, centred around the theme of “elections on your doorstep”, for the May polls. In Scotland, an information booklet was delivered to every household in April.

5.10. The Commission also ran a public awareness campaign ahead of the UKPGE, which was launched on 8 May and ran for two weeks until the voter registration deadline on 22 May. In addition, a campaign aimed at overseas electors was also delivered.

**Duplicate registrations**

5.11. It is clear that significant numbers of registration applications were made in the periods ahead of both polls, especially ahead of the UKPGE.

5.12. The welcome introduction of online registration as part of IER has made it easier for members of the public to apply to register. Unfortunately, this more accessible system, combined with high profile registration campaigns and the language and terminology used on social media, has brought with it a set of new challenges, the most significant of all being the influx of duplicate registrations.

5.13. The volumes of applications submitted late in the process became barely manageable. On 18 April, the day the Prime Minister announced the UKPGE, and whilst the majority of electoral administrators were issuing postal votes for their May polls, registration applications started to spike for the UKPGE.

5.14. On that day alone, 146,810 applications were made online. The BBC reported another surge on the day of the local elections, with 64,075 applying to register online. On 22 May, the registration deadline day for the UKPGE, 622,398 applied, 98% online. In total, just over 2.9 million applications were made between 18 April and 22 May, averaging just under 84,000 applications per day.
5.15. However, and whilst it is encouraging that so many people want to participate in democracy and took the time to apply to register, many such applications were duplicates, made by people already registered to vote.

5.16. In the Electoral Commission’s campaigns, there was once again no mention that if you had received a poll card, you were already registered. We have previously suggested that consideration needs to be given to the wording used in registration campaigns prior to an election to try to reduce the number of duplicate registrations.

5.17. During the UKPGE, it became clear that potential exists for the inadvertent making of a duplicate application through the www.gov.uk/register-to-vote website as it can also be used to request a postal vote application form and change the registration opt out status.

5.18. We asked members to submit details of the number of applications and duplicates received for the last two registration days before the UKPGE to establish the percentage number of duplicates. Whilst the figures provided carry some health warnings, of the 146 local authorities that responded, 42.36% of applications received were classed as duplicate. Although we welcome the fact that for every four duplicate applications there were six new registrations, the impact duplicate registrations have on limited resources cannot continue to be overlooked.

5.19. The Cabinet Office recognised the growing issue and made changes to the wording on, and introduced an additional page to, the website, which had a minor, but positive, effect.

5.20. Prior to the UKPGE being called, the Cabinet Office had commenced a review of the www.gov.uk/register-to-vote website, which the Association welcomed. UKPGE experiences confirm that this review is urgently required and we are reassured that the Cabinet Office has recommenced this workstream.

5.21. We encourage Government not to delay in identifying and implementing solutions as this ongoing problem needs to be resolved in advance of the May 2018 elections.

Cost implications of duplicates

5.22. As explained previously, the costs associated with registration are met by local authorities and cannot be claimed as election expenses even though it is patently clear that elections themselves directly lead to an increase in applications. The introduction of online registration
has resulted in individuals making applications to register later in the process and in greater numbers meaning more resources are required than ever before.

5.23. Local authorities will not have budgeted for the additional resources that were needed for the processing of the significant volume of registration applications created by the unexpected UKPGE. However, in order to manage workload, EROs were required to allocate significant resources in the form of additional temporary staff, the secondment of staff from other departments and the payment of overtime to process the registration and absent vote applications. None of these costs are currently recoverable as a UKPGE expense.

**Verification of applications**

5.24. As part of the IER process, the identity of all applicants must be verified against DWP data. If they fail this test, they are required to supply additional evidence to the ERO.

5.25. We have previously highlighted that there is currently no requirement for an applicant to provide an email address. If an email address were to be supplied, it would allow requests for documentary evidence to be sent to the applicant via this medium thereby saving considerable time, especially in the case of overseas electors, as well as delivering a cost saving.

5.26. At the EU referendum in June 2016, the register to vote website failed immediately before the registration deadline. A full and thorough review was subsequently undertaken by the Cabinet Office, which resulted in contingency measures being put in place that included increasing capacity and improving resilience as well as moving to a new hosting provider.

5.27. Despite this, administrators were understandably nervous that a similar situation might occur in the run up to the UKPGE, but the measures put in place worked well and ensured there was no repeat.

5.28. Over the May and June election periods, there were occasions when verification files were delayed, along with website and DWP maintenance updates. However, it is clear that lessons have been learnt from previous years as demonstrated by the rescheduling of one piece of maintenance work to a different date and time following concerns raised by members.
5.29. We commend the Cabinet Office and the DWP for their efforts in respect of the verification process and for making arrangements to schedule additional verification file processing downloads throughout the May and UKPGE timetables so that applications could be determined more quickly.

Franchise issues

Registration of overseas electors

5.30. The administration of overseas electors again provided one of the biggest administrative challenges this year.

5.31. The UKPGE franchise includes overseas electors. Currently, overseas electors are entitled to register to vote at UK Parliamentary elections for 15 years after last being registered as an ordinary elector at an address in the UK. In the vast majority of cases, overseas electors register immediately prior to a UKPGE and, as is traditionally the case, immediately following the announcement of the election, the volumes of applications received increased significantly.

5.32. The administration of overseas electors requires a disproportionate amount of staff resource, mainly caused by the requirement to check that the applicant had been registered within the local authority area within the last 15 years.

5.33. The costs of processing overseas applications is an ERO function and therefore met by the local authority, not as an election expense. It should however be recognised that overseas electors are not entitled to vote at local government elections, which makes the increased cost burden on local authorities unpalatable.

Renewal of overseas’ declarations

5.34. Overseas declarations must be renewed every 12 months.

5.35. At the start of the UKPGE timetable, it became clear that a high number of overseas electors who had registered for the EU referendum in 2016 had not responded to ERO renewal requests, despite being reminded.

5.36. Because of the requirements of the UKPGE timetable, poll cards were issued, including to their nominated proxies, and postal ballot papers sent just before overseas electors were removed from the register on the 1 June final interim notice of alteration.
5.37. The impact of this meant that, even though these electors believed they could vote on 8 June, whether in person, by post or by proxy, they were not able to as their details were not included on the register to be used on polling day.
### CHAPTER 5 RECOMMENDATIONS

<table>
<thead>
<tr>
<th>2017 – 13</th>
<th>The planned review of the Government’s website, including the digital service, should be undertaken as a priority and any resultant changes required made immediately the review is completed.</th>
</tr>
</thead>
</table>
| 2017 – 14 | As part of its immediate work programme, Cabinet Office should include workstreams that will:  
- Deliver an effective resolution to the ongoing issue of duplicate registrations;  
- Develop and extract management information from electoral management software systems that will be of assistance to EROs in the management of their electoral registers;  
- Reduce bureaucracy in registration processes, both during and outside of canvass periods;  
- Enable the better sharing of data in order to simplify registration processes;  
- Deliver an effective solution to the registration of individuals in establishments such as universities, colleges, residential care homes and houses in multiple occupation.  

The Cabinet Office should also set out a clear timetable of when each of these issues will be considered. |
| 2017 – 15 | The provision of an email address should be made mandatory for all applications to register to vote made through the digital service. |
6.1. During the run up to the UKPGE, there were several issues raised in relation to messaging on the Government’s www.gov.uk/register-to-vote and the Electoral Commission’s www.yourvotematters.co.uk websites.

6.2. Updating of the messaging on the Government’s www.gov.uk/register-to-vote website was inconsistent. Although some pages were changed, e.g. after the deadline to register to indicate it was too late to do so in time for the UKPGE, it became clear that not all pages were automatically updated throughout the election timetable.

6.3. For example, the www.gov.uk/voting-in-the-uk page directed users to a postal vote application form after the deadline for applications for the UKPGE, with no messaging to that effect. Similar issues were experienced in relation to proxy applications and the need to apply for an emergency proxy after the proxy deadline. Other forms, such as that to enable a proxy to apply to vote by post, were simply not available.

6.4. In many cases, updates were made only when errors were brought to the Cabinet Office’s attention by the AEA, although it should be recognised that officials responded rapidly when advised. We were however surprised to discover that the Cabinet Office does not own all such pages and is limited in what it can do to make important changes at short notice. We were also disappointed that better plans were not in place to ensure that such updating of all relevant webpages was not done automatically.

6.5. There were also issues with the Commission’s www.yourvotematters.co.uk website. Complaints were received from electors who applied for a postal vote before going on holiday and expected their postal ballot paper to be sent the same day. It became apparent that messaging on the website did not make it clear that postal ballot papers are not posted out instantly.

6.6. In addition, the www.yourvotematters.co.uk/how-do-i-vote/voting-by-proxy page originally stated that 16-year olds could act as proxies in Scotland, which is not the case for UKPGE’s. The Commission did correct this error immediately it was advised.
6.7. As a result of the confusion and mixed messaging faced on this occasion, we raise a query as to why information relating to absent voting is available and duplicated on the two websites? We consider it would be better if the www.gov.uk/register-to-vote website dealt solely with applications to register to vote and redirected those wishing to apply for an absent vote to www.yourvotematters.co.uk.

2017 – Welsh-language forms

6.8. The Government’s digital service provides for applications to register to be made in Welsh.

6.9. However, we were extremely concerned to note that despite the Government’s response to our 2015 report that “further improvements are currently in development to ensure other communications, including postal vote applications, are also available in Welsh”, no Welsh-language absent voting forms were available to download once again.

6.10. We return to the issue of other Welsh-language forms in chapter 8.

Postal vote identifier rejection notices

6.11. Legislation requires that, where an absent voter appears on the list of rejected postal ballot papers, EROs must, within three months of the date of the poll, notify the elector or proxy postal voter that their postal ballot paper was rejected because the RO was not satisfied that the postal voting statement was duly completed.

6.12. Sending postal vote identifier rejection notices shortly after a poll helps to ensure that voters whose identifiers fail to match can participate effectively in future polls and not have their postal vote rejected for the same reason.

6.13. Unfortunately, the short gap between the May 2017 polls and the UKPGE presented particular challenges for EROs, which influenced their decision as to how to proceed.

6.14. The AEA worked closely with the Electoral Commission to support EROs who chose to send the original notices in time to help to ensure that any error that led to rejection in May was not repeated in June. However, the window for despatching the notices was very tight and the entire legal process could not be completed in full before the UKPGE, adding to the complexity of managing two polls back to back.
Issuing postal votes early

6.15. To enable postal voters, in particular those overseas, to have as much time as possible to receive and return their postal ballot paper before an election, legislation allows for their despatch as soon as practically possible.

6.16. The interim notices process supports the despatch of postal votes at an early stage in the timetable, particularly to those electors who apply to register closer to the electoral event. However, a postal vote can only be issued to an elector who has already been added to the register.

6.17. Generally, postal vote despatches start shortly after the deadline for withdrawal of nominations, once the ballot papers have been printed. However, whilst that was possible at the May scheduled polls, the timing of the UKPGE presented different challenges.

6.18. The distribution of postal ballot papers is often reliant on the workload and scheduling of print suppliers. As there are a limited number of specialist electoral print suppliers available, the back to back polls created severe pressure on their capacity to deliver specific requirements to ROs.

6.19. In many cases and, for understandable production reasons, print suppliers prescribed when their customers would receive their printed matter and despatch postal votes. This meant that due to circumstances beyond the control of the RO, it is not always possible to issue postal votes in accordance with local plans or Electoral Commission performance standards.

6.20. The early despatch of postal ballot papers means that electors can cast their votes and return them to the RO well in advance of polling day. However, registration deadlines also provide sufficient time for electors to be removed from the register of the electors before polling day, e.g. at the UKPGE, a postal voter who had legitimately returned their postal ballot paper could have been removed on the final notice of alteration published on 1 June because of a change of address or the non-renewal of an overseas elector declaration.

6.21. The legislation is clear that an individual is only entitled to vote if they are shown on the register on polling day.
6.22. Following discussions with the Electoral Commission and Cabinet Office, it was agreed that whilst there is currently no prescribed process to allow a RO to cancel postal votes returned by electors who had been removed by the effect of the interim or final notices, section 1 of the Representation of the People Act 1983 makes it clear that such votes cannot be counted.

6.23. Commission advice was amended to make it clear that any postal votes returned from electors who had been removed from the register needed to be set aside and not counted. ROs had to consider how to manage the process, including ensuring that there was a clear audit trail.

6.24. It is clear there is a fundamental flaw in the legislation. We therefore consider it essential that a legislative process be prescribed to provide clarity to ROs at future polls.

**Overseas electors absent vote arrangements**

6.25. In what has become a commonplace occurrence, a significant number of overseas electors did not request absent voting facilities when originally applying to register. This resulted in either significant time being spent by administrators in contacting, or attempting to contact, those individuals to seek their instructions and/or situations where overseas electors will have been registered but then unable to participate without returning to their polling station.

6.26. There were also issues where electors had limited understanding and/or unrealistic expectations of the process. Many applied for postal votes when they were unlikely to receive and return them in time and/or expected postal votes to be sent to them immediately, on occasions before the close of nominations or before their applications had been determined.

6.27. In addition, some appointed a proxy who themselves lived a distance from the local authority area in which the overseas elector was registered. Again, this led to many votes remaining uncast, simply because the proxy could not attend the relevant polling station.

6.28. Members faced unnecessary and unreasonable criticism as a result. We have previously raised this as an issue, especially in view of the Government’s proposal to remove the 15-year registration period of overseas electors. We continue to recommend that overseas electors should be required to make suitable absent vote arrangements at the time they register to vote.
International business reply postage

6.29. The Cabinet Office agreed to fund the costs of the International Business Response Licence for the return envelopes for overseas postal votes at the UKPGE. As in 2016, there were some issues in respect of the licences not being recognised by overseas mail services and delayed returns, although fewer instances were reported to us.

6.30. Whilst a single licence was sufficient for the EU referendum, as the poll was conducted on local authority areas, one licence was not sufficient where a poll is conducted on UK parliamentary constituency boundaries, because all postal vote envelopes needed to be pre-sorted prior to postal vote opening. This led to resource pressures at postal vote openings for those local authorities with more than one parliamentary constituency within their area.

Proxies

6.31. The Electoral Commission recommends that EROs check that any individual appointed as a proxy is registered as an elector (as required by law) and entitled to vote in the type of poll being contested. In the case of out of area appointments, electoral administrators are required to contact other EROs to check.

6.32. This provided a challenge at the UKPGE, where resources were stretched and because of the lack of a central database that details direct line numbers for electoral services offices. As an Association, we are happy to commit to developing a generic list of contact details to assist members in undertaking such checks.

Emergency proxies

6.33. We have previously reported on the increasing numbers of emergency proxies, presenting additional resourcing challenges to electoral administrators. Similar issues were faced on this occasion.

6.34. With the volumes of emergency proxy applications now being received, we continue to question whether a deadline of 5pm on polling day is appropriate. We also query whether the criteria should not be reviewed as there is currently no facility to appoint an emergency proxy in the case of an elector having to attend a funeral on polling day or having to go away to care for a relative who has suddenly been taken ill, or to change an appointed proxy if the proxy originally appointed is suddenly taken ill or, because of an emergency occupation, service or employment reason, they cannot get to the polling station in person.
# CHAPTER 6 RECOMMENDATIONS

<table>
<thead>
<tr>
<th>2017 – 16</th>
<th>Attestation arrangements should be introduced for postal vote applications requiring a signature waiver.</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017 – 17</td>
<td>A process to cancel a postal ballot paper issued to an elector who is subsequently deleted from the electoral register during an election period should be introduced as a matter of urgency.</td>
</tr>
</tbody>
</table>
| 2017 – 18 | A full and thorough review of absent voting arrangements should be undertaken that, as a minimum, considers:  
- The circumstances and criteria for emergency proxy applications;  
- The need for the attestation of fixed-period and indefinite proxy applications, given that this is not a requirement for postal vote applications; and  
- How the registration status of individuals appointed as proxies should be verified by Electoral Registration Officers. |
| 2017 – 19 | Overseas electors should, as part of their original application and subsequent renewal, be required to specify suitable absent voting arrangements or confirm that they wish to vote at their allocated polling station in the UK. |
| 2017 – 20 | The effectiveness and future use of the International Business Response Licence for postal votes being sent overseas should be evaluated ahead of the next set of national polls. |
CHAPTER 7: Candidates, campaigns and public awareness

7.1. The media coverage of the UKPGE completely overshadowed the May polls, with daily news reporting about the UKPGE commencing before the May polls had been held. As was the case with the EU referendum in 2016, this caused confusion amongst electors, many of whom were unaware that there were polls taking place on 4 May.

7.2. The tone of the campaigns and their subsequent reporting led to confusion amongst electors, who expected to see the party leaders listed on their ballot paper as candidates and did not understand that they were instead voting for their local Members of Parliament.

7.3. The Electoral Commission provided excellent information and guidance for candidates and agents for both the May polls and the UKPGE, including templates of the various nomination forms as part of the candidates’ guidance.

7.4. Unfortunately, and as with the RO guidance referred to earlier, some of the resources were removed from its website whilst they were being updated at a time when they were most needed by prospective candidates.

7.5. We are reassured that the Commission has now developed a generic set of guidance for all elections, accessible at all times, with notes to the effect that any associated election-specific guidance is being updated.

Access and supply of the electoral register

7.6. We have previously highlighted that access to the electoral register by independent candidates has been an ongoing concern for many years and recommended that such access arrangements be reviewed.

7.7. Candidates cannot be supplied with the electoral register and lists of absent voters until they are actually recognised as candidates, which is, at the earliest, for a UKPGE the date Parliament is dissolved and at other elections, the last date for the publication of Notice of Election.

7.8. Registered national and constituency political parties have access to the electoral registers and lists on an ongoing basis whereas independent candidates must wait until Parliament’s dissolution or publication of the Notice of Election to receive a copy.
7.9. It is at regional elections, such as those to county councils and combined mayoral authorities, where there is a need for consistency between EROs across the area.

7.10. Electoral administrators are often placed in the difficult position of having to explain that although subscriber details are an essential part of the nomination process at many elections, they cannot provide the register to independent candidates until, for example, the Notice of Election has been published.

7.11. In its response to our 2016 report, the Government stated that it was “open to discussion with the AEA, Electoral Commission and others to see whether a way through this difficult issue can be found”, but no progress has been made, which is extremely disappointing.

**Standing for election and delivery of nomination papers**

7.12. At a UKPGE, the receipt of nominations commences the day after publication of the Notice of Election, which itself must be published within two days of the receipt of the Writ. The deadline for receipt of nominations is 4pm on the nineteenth working day before the poll, which was Thursday 11 May on this occasion.

7.13. One of the primary considerations for ROs with polls in May was whether to publish the Notice of Election on 4 May (local election polling day), 5 May or 8 May. The later the publication, the less impact on the local elections but reduced time available for the receipt of nominations.

7.14. We have previously challenged the need for candidates to have subscribers to their nominations, ten in the case of the UKPGE. The Government’s response to our recommendation in 2015 was “On the issue of subscribers, we note that this provision is there to ensure that any candidate can be shown to have a level of support within the electoral area. To remove this requirement could mean that people stand who are not serious candidates and which would both increase the costs of running polls and mean that electors find themselves voting for individuals whose candidature is essentially frivolous.”

7.15. The Association does not believe that the reasons given for discounting our recommendation are credible and therefore we urge the Government to reconsider this issue alongside the need for, and level of, candidate deposits at certain elections.
Commonly used names and change of name by deed poll

7.16. We have raised the issue of commonly used names in previous election reports. Legislation currently requires that a commonly used name is one which is different from any other forename or surname. This means that a forename in its original format cannot be used as a commonly used name, nor can a middle name which the candidate is known by. If a candidate wishes to use a commonly used forename and/or surname, then these must be different from their full name as it appears on the nomination paper.

7.17. We do not believe this was the original intention of Parliament so encourage the Government to clarify the situation in legislation as soon as practicably possible.

7.18. In its response to our 2015 report, the Government, in broadly supporting the recommendation to resolve the situation, stated that it was intending to “look for an appropriate opportunity to consider amending the relevant legislation”. We remain disappointed that no such “opportunity” has yet presented itself and strongly recommend that the Government addresses the situation urgently.

7.19. In addition, the issue of an individual changing their name by deed poll ahead of an election also needs to be clarified, either in legislation or by guidance, in order to avoid sham nominations. At a by-election in 2016, a candidate did exactly this, and at this year’s UKPGE, it was reported that an individual approached a number of ROs as a potential candidate suggesting a range of different names, either as political slogans or names that might be considered a sham. Several RO’s had to seek independent counsel’s advice as a result.

Home address form

7.20. We have previously highlighted the inconsistency that whilst there is provision at certain elections to withhold a candidate’s home address on published documentation, such as the ballot paper, it does not extend to all elections.

7.21. We were reassured that in responding to our 2015 report, the Government recognised this inconsistency as an issue. However, we remain disappointed that the promised review of the current arrangements has not yet commenced.
Publication of election agents’ home addresses

7.22. On a related issue, the statutory Notice of Election Agents must include both the home and office addresses of agents even where at an election such as a UKPGE, a candidate acting as their own agent has chosen to withhold their home address from the ballot paper. This is exacerbated where candidates who do not formally appoint an election agent by the deadline automatically become their own agents.

7.23. We cannot see any legitimate need for agents’ home addresses to be published – an office address by itself should be sufficient – and therefore consider that the requirements for ROs to do so should be removed, not least to be respectful of personal safety considerations.

Electoral Commission campaigns

7.24. The Electoral Commission ran a registration campaign for the May polls, which centred around the theme of “Elections on your doorstep”. It was unfortunately reported that the national television advertising campaign failed to indicate that local elections were only happening in certain parts of the country, resulting in those local authorities without any polls in May being inundated with emails and calls from electors who had not received poll cards or postal votes.

7.25. In Scotland, a “Scottish Council elections voter information booklet” was delivered to every household between 3 to 8 April. The booklet explained how to vote at the elections by placing numbers against candidates in the order of the voter’s choice and that 16-year olds could vote at the Scottish Council elections.

7.26. A separate public awareness campaign was delivered before the UKPGE. This was launched on 8 May and ran until the voter registration deadline on 22 May. The Commission also delivered an overseas campaign encouraging overseas electors to register. However, because of the tight timescale, it was understandably later than would be desired.

7.27. The Electoral Commission provided participation resources for local authorities to support their public awareness work in encouraging voter registration and providing information on elections locally. These resources were for use by electoral administrators and their communication teams and included advertising templates and press releases.
Social media and communication in the digital age

7.28. We have previously reported on the challenges that electoral administrators face with information being available instantly online.

7.29. Whilst people can now register online, they are still not able to vote online. There were many reported incidences at the UKPGE of overseas electors expecting to be able to vote online or have their ballot papers emailed to them, which caused lengthy and difficult conversations at pressurised times.

7.30. Over recent years, communication methods have changed, with people communicating 24 hours a day and expecting an instant response. Significant volumes of emails were received by administrators, with reports that inboxes were re-filling as fast as emails were being cleared.
### CHAPTER 7 RECOMMENDATIONS

<table>
<thead>
<tr>
<th>2017 – 21</th>
<th>The use of any part of a candidate’s forename and/or middle name(s) should be permitted as a commonly used name.</th>
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</thead>
<tbody>
<tr>
<td>2017 – 22</td>
<td>A full and thorough review of the access and supply arrangements that apply to the electoral register and the lists of absent voters should be undertaken, to include consideration of those that relate to candidates, political parties and third parties such as Credit Reference Agencies.</td>
</tr>
<tr>
<td>2017 – 23</td>
<td>The option for candidates to restrict publication of their home addresses should be extended to all polls.</td>
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<tr>
<td>2017 – 24</td>
<td>The requirement for election agents’ home addresses to be published should be removed.</td>
</tr>
<tr>
<td>2017 – 25</td>
<td>Nomination arrangements for all elections, specifically in respect of the requirement for subscribers and deposits, should be reviewed.</td>
</tr>
</tbody>
</table>
CHAPTER 8: Other administrative matters

8.1. In the period immediately following the announcement of an election result, a considerable amount of work still needs to be done. This includes the return of the Writ, the return of deposits for the UKPGE, the payment of staff, accounting for tax and pension deductions, the retention and storage of election documentation, receiving expenses returns from candidates and returning information and data to the Electoral Commission.

Return of deposits

8.2. At a UKPGE, the £500 deposit made by or on behalf of a candidate must be returned if the candidate polls more than 5% of the valid votes cast. If a candidate fails to poll 5% of the total number of valid votes cast, their deposit is forfeited to the Crown.

8.3. The deposit must either be returned to the person who made it or to the Crown by no later than the next working day after the result of the election is declared. In most cases, this will be on the Monday following the poll.

8.4. In our 2016 report, we recommended that the UK Government should review the requirement for the deposit to be returned no later than the next working day after the result of the election is declared with a view to setting a more realistic timeframe. We note the Government’s response that it is “not seeking to amend this requirement at present”, but on the basis that no reasoning for this decision was given, we make the same recommendation again.

Candidates’ expenses returns

Return of expenses

8.5. At a UKPGE, candidates and their agents are required to submit an election expenses return and declaration to the RO within 35 calendar days of the election result. Similar arrangements are in place for the majority of other elections.

8.6. It is an offence not to comply with these requirements. However, the Crown Prosecution Service has continually failed to prosecute in cases where candidates and agents have failed to comply. This begs the question whether the current legislation is either relevant or effective.
8.7. We therefore consider that an urgent review is required and, if the requirement to make such returns is maintained in its current or an adapted format, it be properly enforced by the authorities.

**Publication of returns**

8.8. Within ten working days of the 35-day deadline mentioned above, ROs are required to publicise in two newspapers circulating in their area the availability of these returns for inspection. They must also provide copies of these returns to the Electoral Commission, although in practice, the Commission does not request all of the documentation in every case.

8.9. The returns are then held by the RO and made available for public inspection. The RO and their staff effectively act as intermediaries in the regulation of election finance, with their employing local authorities meeting the costs incurred.

8.10. We have recommended on a number of occasions that consideration should be given to developing an online facility for the submission of candidates’ election expenses returns, with provision for both the candidate and agent to signify secure approval of the final return. Such a system should also provide a means for inspecting the returns, declarations and associated papers.

8.11. In the Government’s response to our 2015 report, it highlighted that the development of such a facility would likely incur substantial cost as an online platform would need to be developed, established and maintained. However, it was prepared to consider the recommendation further with the Electoral Commission, in consultation with key stakeholders such as EROs and political parties. We are extremely disappointed as to the lack of progress being made on this issue.

8.12. In addition, we have also previously recommended that the requirement on ROs to publish the availability for inspection of candidates’ election expenses returns in local newspapers at some polls be revoked and that ROs be placed under a new obligation to publicise their availability on the web.

**Welsh-language forms**

8.13. As previously referred to in chapter 6, the Government’s digital service provides for applications to register to be made in Welsh. However, despite promised improvements, no Welsh-language absent voting forms were available to download.
8.14. Colleagues in Wales also continue to face immense complexity in trying to compile the front and back wording/design of the ballot paper templates, specifically for the local government elections. This ought to be an elementary task, but it is not.

8.15. In 2017, administrators had to take note of 12 separate statutory instruments (six for County/County Borough elections and six for Town and Community Council elections) to ensure that the prescribed English and Welsh wording was utilised. No bilingual templates exist and administrators are simply advised to extract the ‘Welsh’ wording from the relevant orders and prepare their own localised template version. This is adding additional risk of mistakes on ballot papers.

8.16. The same issue occurs in relation to other prescribed election stationery (poll cards, notices, etc.) and links to the perennial complaint about the late publication of Welsh Forms Orders.

8.17. This situation is completely unacceptable and needs to be treated more seriously by the Government.

**Legislative issues and carried-forward recommendations**

8.18. Over the years, the Association has brought to the attention of the Government and the Electoral Commission numerous anomalies and omissions in both legislation and guidance, which introduce confusion and unnecessary risk into electoral processes. During the 2017 elections, we identified even more.

8.19. Where we have not covered them elsewhere in this report, we have summarised some of the key anomalies below, and urge that steps be taken to positively resolve them as soon as practicably possible.

8.20. “Guidance to Voters”

It became clear in 2017 that the prescribed Guidance for Voters notice at standalone UK Parliamentary elections is different to those used at other polls in that it is textual rather than, as at all other polls, pictorial. However, where a UK Parliamentary poll is combined with another poll, a pictorial version is prescribed.

This anomaly did create some confusion during the UKPGE and ought now to be corrected.
8.21. **Updating the register of electors at an election**

There are currently four lists that make up the register of electors: the list of parliamentary electors; the list of local government electors; the list of European Union citizens entitled to vote at European Parliamentary elections; and the list of peers resident outside the UK. However, section 9(5) of the Representation of the People Act 1983 requires the registers to be combined as far as practicable.

One of the practical effects of recent changes to registration deadlines is the fact that the register is updated much closer to an election, which has introduced uncertainty into the provision of registers to recipients, including candidates. This issue was particularly highlighted in Scotland because of the extension of the franchise to 16-year olds at local government elections.

The Electoral Commission confirmed that only the relevant part of the register is updated throughout an election period. This meant that at the UKPGE, only the list of parliamentary electors was updated, not the other three lists.

However, applications from electors not entitled to vote on 8 June, i.e. European Union nationals, were still being received. Although in time to be included on the respective interim notices for the election, the advice given was that, as their applications only updated the list of European Union citizens, they could not be included on the interim notices despite the fact that section 9(5) requires the four registers to be combined as far as practicable. Although not an issue for the election, non-inclusion on the interim notices effectively resulted in such electors not appearing on the register until 3 July, much later than would be normal.

8.22. **Reservation of RO powers**

In England and Wales, ROs are designated by section 24 of the Representation of the People Act 1983.

The role is primarily ceremonial as the Acting RO is responsible for administering the process.

ROs may reserve two duties to themselves, namely those relating to the delivery of the Writ and the declaration of the result. To reserve the declaration of the result to themselves, the RO must give written notice to the ARO of their intention to do so not later than the day following receipt of the Writ.
In the case of borough constituencies, the timing of the UKPGE presented an issue as because of the timing of annual council meetings, many of the post holders designated by section 24 when the Writ was received, i.e. chair(men) and mayors, were no longer in the same post on polling day, leading to a situation whereby the outgoing RO would not be able to make the declaration of the result.

The Association identified a potential solution for the UKPGE by producing a guidance note on how to manage the situation, but we do consider that the relevant legislation needs to be clarified in order to make the situation clearer.

8.23. **London – Borough Returning Officer**

Whilst this is not applicable for this year’s elections, we have highlighted the longstanding issue in London in respect of elections of the London Mayor and Greater London Assembly whereby the legislation only makes reference to the Greater London Returning Officer (GLRO) and Constituency Returning Officers (CRO).

In practical terms, the 33 Borough Returning Officers (BRO) administer significant parts of the polls in their local authority areas, e.g. postal voting and the poll, but are not recognised.

In responding to our 2016 report, the Government considered that recognising BROs in law “would be a novel situation and ... would ... blur the clear lines of accountability to the Constituency Returning Officer”.

We were extremely surprised and disappointed by this response as it entirely contradicts the arrangements already in force at other regional elections, such as European Parliamentary and Police and Crime Commissioner, where different types of RO are already recognised in legislation, with their roles and responsibilities clearly prescribed.

8.24. **Inspection of documentation post-election**

Except in prescribed circumstances, for a period of one year after receipt, EROs are required to make election documentation, such as marked electoral registers “... available for inspection under supervision not later than 10 days after the date of receipt of a request that has been duly made.”

At the expiration of that one-year period, the ERO must cause the documentation to be destroyed unless advised otherwise by the Courts.
It is however unclear what the correct process is where a request for inspection is made within the final ten days of the year, i.e. should the ERO permit access within the ten-day period even if that falls after the year deadline or is that deadline immovable?

8.25. **Publication of the register of electors where an election is held during the canvass period**

Where a casual vacancy or by-election is held during the canvass period, which is defined as being from 1 July to 1 December, EROs are permitted to defer publication of the revised register of electors for that electoral area from 1 December to 1 February.

The legislation is however vague in relation to the definition of an “election”, i.e. is an election seen as the total event or polling day alone? Clarity is urgently required.

In addition, where publication of the register is deferred, there are practical elements as to the issue of notices of alteration.

Current regulations provide that notices of alteration are not to be issued in the two months preceding publication of the annually revised register, as well as in the month of the actual revision. Where the register is revised by 1 December, this means that notices are not issued in October, November or December.

However, where an ERO decides during canvass to defer publication to 1 February because of an election occurring during the canvass period, although notices of alteration will not then be necessary in December, January and February, the reality is that they will also not have been issued in October and November. EROs are therefore unwittingly breaching the regulations.
# CHAPTER 8 RECOMMENDATIONS

| 2017 – 26 | A full and thorough review of the processes that deal with the recording of candidates’ expenses should be undertaken, including consideration of the return to, and subsequent reporting of, expenses to Returning Officers and the possible provision of online reporting and inspection mechanisms. |
| 2017 – 27 | The period to return deposits, whether to candidates or where forfeited, should be extended to one calendar week after the date of the poll. |
| 2017 – 28 | A formal complaints system as outlined by the Law Commissions that provides for a clearer and local system of accountability and challenge should be designed and introduced.  

The Government responded to recommendation 2-11 made in our 2015 report that it was “working jointly with [the Law Commissions] on the next steps following its report”, but little apparent progress has been made. |
| 2017 – 29 | A full and thorough review of all forms used in the electoral process should be undertaken.  

The Government “noted” our previous recommendation 9-3 in its 2015 response and advised that it would “examine this issue with relevant partners”, but no apparent progress has been made. |
| 2017 – 30 | Legislation should be amended to clearly identify what constitutes a valid second registration.  

The Government has failed to address our previous recommendation 3-5, originally made in our 2015 report. |
| 2017 – 31 | At any future national referendum, legislation should provide for the appointment of sub-agents.  

No response to recommendation 11-3 made in our 2016 report has been received. |
| 2017 – 32 | A full and thorough review of the various legislative anomalies and omissions identified by the AEA and other stakeholders should be undertaken urgently, to include but not be limited to:  
- Updating the prescribed format of the Guidance for Voters notice for use at standalone UK Parliamentary elections;  
- Defining the electoral register as one document in law;  
- Clarifying the roles and responsibilities of Returning Officers at UK Parliamentary elections, specifically in respect of reserving the right to announce the result of the poll;  
- Recognising in law the role of Borough Returning Officer at elections of the London Mayor and Assembly;  
- Clarifying the inspection arrangements for election documentation following an election; and  
- Clarifying the arrangements around deferring publication of the electoral register where an election occurs during the defined canvass period. |
| 2017 – 33 | The processes for the registration of political parties should be fully reviewed in order to:  
- Provide certainty to Returning Officers as to deadlines applicable to new and amended party descriptions and emblems; and  
- Maintain a list of official party and campaigner email addresses which can be made easily available to Electoral Registration Officers for queries and/or the secure transfer of data.  

The Government responded to recommendation 7-9 made in our 2015 report that it had “spoken informally on this matter with the Electoral Commission and other partners and will look for an opportunity to address the issue ahead of future polls”, but little apparent progress has been made. |
The entire electoral community should be congratulated on delivering safe and secure elections in 2017 despite the intense pressure individuals were working under.

An AEA member, in responding to the post-election survey, summed up the situation perfectly:

“Whilst generally we have focussed on what went wrong or where there were issues, it should be recognised that the vast majority of our electors had a positive voting experience. In seven weeks, we have all organised a national, high turnout poll which would normally be arranged over seven months and this is to be commended.”

Chris Skidmore MP recognised those efforts in a personal letter sent to electoral administrators on 28 June 2017:

“As Minister for the Constitution with responsibility for elections I wanted to write to you personally to thank you for the tremendous efforts that you and your team have put into running elections in 2017. I know that this has been an extremely busy time for the electoral community, with local elections, mayoral elections and a general election all taking place within the space of a few weeks in many areas … these successes were down to a relatively small number of people – you, your team and others like you across the country – making big sacrifices. Most voters will not have realised the logistical challenges of 4 May and 8 June. But I know that we owe the smooth running of these elections to your dedication to democracy. For that commitment and for all the sheer hard graft by you and your team I simply want to say: thank you.”

As outlined in this report, it is very clear that many things went well and where issues arose, swift action was taken. For that, administrators, the Government, the Electoral Commission, Royal Mail, the electoral management software suppliers and the print partners should rightly be congratulated.

However, we remain extremely concerned that without positive and urgent action, the many weaknesses and contradictions our members have identified in current systems and procedures will eventually cause the system to further fracture and fail. When that happens, public-trust in our democratic processes will be irreparably damaged.
With a new Government in place, there is a clear opportunity to move the agenda forward and address the fundamental issues that exist.

Whilst we acknowledge that Parliamentary time will, in the immediate short-term, be dominated by Brexit, Government should not use that as an excuse to drag its heels on the weaknesses inherent in our electoral systems.

The Association strongly urges the Government and other key stakeholders to move forward in a positive manner in reviewing the issues and recommendations contained in this report, as well as those made by the Law Commissions and the Electoral Commission, so that it is in a position for the necessary legislative changes to be laid before Parliament immediately following the completion of Brexit.

Indeed, we are reassured that in some of the areas identified, work has already commenced. However, the most crucial challenge for all involved is to deliver outcomes that are effective, and without unnecessary delay.

In conclusion, we repeat our two specific requests of Government:

1. That it positively addresses the issues we, and the Electoral Commission, have raised, and does not shy away from the more difficult challenges; and

2. That it does so with a greater sense of urgency than has been demonstrated over the last few years.

We look forward to continuing to work with all relevant stakeholders to drive the necessary reforms through.
## FULL LIST OF RECOMMENDATIONS

<table>
<thead>
<tr>
<th>Number</th>
<th>Recommendation</th>
<th>Chapter</th>
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<tbody>
<tr>
<td>2017 – 1</td>
<td>A single Electoral Administration Act should be brought forward, implementing the Law Commissions’ recommendations to simplify electoral legislation.</td>
<td>3</td>
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</table>
| 2017 – 2 | A full and thorough review of the funding of the delivery of electoral services should be undertaken as a matter of urgency, with the purpose of ensuring that:  
- All costs properly incurred in the administration of elections, including electoral registration costs directly attributable to the election, are reimbursed to Returning Officers and their employing local authorities; and  
- All costs properly incurred in delivering electoral registration are automatically provided to local authorities without the need to revert to the justification led bidding process. | 3       |
<p>| 2017 – 3 | EROs should be given responsibility for the subdivision of UK parliamentary constituencies into polling districts, and ROs for the designation of polling places within those districts. | 3       |
| 2017 – 4 | A full and thorough review of all election and electoral registration deadlines should be undertaken as a matter of urgency, specifically considering those that apply to the registration of electors, overseas electors and absent voting. | 3       |
| 2017 – 5 | Expenses claims submitted to the Election Claims Unit should be audited and settled within six months of their receipt.                                                                                           | 3       |</p>
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<thead>
<tr>
<th>Number</th>
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<tr>
<td>2017 – 6</td>
<td>A full review of the combination of polls should be undertaken, considering issues such as which polls should be automatically combined, consideration of the maximum number of polls that should be combined on the same day and the combination of polls for parish and community councils and neighbourhood planning and council tax referendums with UK Parliamentary general elections.</td>
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<tr>
<td>2017 – 7</td>
<td>Where combined with another poll, the requirement to commence the counting of the votes at a UK Parliamentary election within four hours of the close of poll should be removed.</td>
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<td>2017 – 8</td>
<td>The absolute requirement to count unused ballot papers as part of the verification process should be removed to be replaced with a requirement to do so only where the Returning Officer considers it appropriate.</td>
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<td>2017 – 9</td>
<td>An electronic system for the delivery, receipt and return of the Writ at UK parliamentary elections should be introduced.</td>
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<td>2017 – 10</td>
<td>Full examination of the benefits of and issues presented by electronic forms of counting should be undertaken in order to assess effectiveness where it is currently permitted and to consider suitability for use at other types of election.</td>
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<tr>
<td>2017 – 11</td>
<td>The roles and responsibilities of polling station tellers should be recognised in law.</td>
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<td>2017 – 12</td>
<td>The involvement of campaigners in handling and/or assisting with the completion of postal ballot papers should be prohibited.</td>
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<tr>
<td>Number</td>
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<td>2017 – 13</td>
<td>The planned review of the Government’s website, including the digital service, should be undertaken as a priority and any resultant changes required made immediately the review is completed.</td>
<td>5</td>
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<td>2017 – 14</td>
<td>As part of its immediate work programme, Cabinet Office should include workstreams that will:</td>
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<td>• Deliver an effective resolution to the ongoing issue of duplicate registrations;</td>
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<td>• Develop and extract management information from electoral management software systems that will be of assistance to EROs in the management of their electoral registers;</td>
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<td>• Reduce bureaucracy in registration processes, both during and outside of canvass periods;</td>
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<td>• Enable the better sharing of data in order to simplify registration processes;</td>
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<td>• Deliver an effective solution to the registration of individuals in establishments such as universities, colleges, residential care homes and houses in multiple occupation.</td>
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<td>The Cabinet Office should also set out a clear timetable of when each of these issues will be considered.</td>
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<td>2017 – 15</td>
<td>The provision of an email address should be made mandatory for all applications to register to vote made through the digital service.</td>
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<td>2017 – 16</td>
<td>Attestation arrangements should be introduced for postal vote applications requiring a signature waiver.</td>
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<td>2017 – 17</td>
<td>A process to cancel a postal ballot paper issued to an elector who is subsequently deleted from the electoral register during an election period should be introduced as a matter of urgency.</td>
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<tr>
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</tbody>
</table>
| 2017 – 18 | A full and thorough review of absent voting arrangements should be undertaken that, as a minimum, considers:  
• The circumstances and criteria for emergency proxy applications;  
• The need for the attestation of fixed-period and indefinite proxy applications, given that this is not a requirement for postal vote applications; and  
• How the registration status of individuals appointed as proxies should be verified by Electoral Registration Officers. | 6 |
<p>| 2017 – 19 | Overseas electors should, as part of their original application and subsequent renewal, be required to specify suitable absent voting arrangements or confirm that they wish to vote at their allocated polling station in the UK. | 6 |
| 2017 – 20 | The effectiveness and future use of the International Business Response Licence for postal votes being sent overseas should be evaluated ahead of the next set of national polls. | 6 |
| 2017 – 21 | The use of any part of a candidate’s forename and/or middle name(s) should be permitted as a commonly used name. | 7 |
| 2017 – 22 | A full and thorough review of the access and supply arrangements that apply to the electoral register and the lists of absent voters should be undertaken, to include consideration of those that relate to candidates, political parties and third parties such as Credit Reference Agencies. | 7 |</p>
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<tr>
<th>Number</th>
<th>Recommendation</th>
<th>Chapter</th>
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<tr>
<td>2017 – 23</td>
<td>The option for candidates to restrict publication of their home addresses should be extended to all polls.</td>
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<tr>
<td>2017 – 24</td>
<td>The requirement for election agents’ home addresses to be published should be removed.</td>
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<td>2017 – 25</td>
<td>Nomination arrangements for all elections, specifically in respect of the requirement for subscribers and deposits, should be reviewed.</td>
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<td>2017 – 26</td>
<td>A full and thorough review of the processes that deal with the recording of candidates’ expenses should be undertaken, including consideration of the return to, and subsequent reporting of, expenses to Returning Officers and the possible provision of online reporting and inspection mechanisms.</td>
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<td>2017 – 27</td>
<td>The period to return deposits, whether to candidates or where forfeited, should be extended to one calendar week after the date of the poll.</td>
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<td>2017 – 28</td>
<td>A formal complaints system as outlined by the Law Commissions that provides for a clearer and local system of accountability and challenge should be designed and introduced.</td>
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<tr>
<td>2017 – 29</td>
<td>A full and thorough review of all forms used in the electoral process should be undertaken.</td>
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<td>2017 – 30</td>
<td>Legislation should be amended to clearly identify what constitutes a valid second registration.</td>
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<tr>
<td>2017 – 31</td>
<td>At any future national referendum, legislation should provide for the appointment of sub-agents.</td>
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<tr>
<td>Number</td>
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| 2017 – 32 | A full and thorough review of the various legislative anomalies and omissions identified by the AEA and other stakeholders should be undertaken urgently, to include but not be limited to:  
- Updating the prescribed format of the Guidance for Voters notice for use at standalone UK Parliamentary elections;  
- Defining the electoral register as one document in law;  
- Clarifying the roles and responsibilities of Returning Officers at UK Parliamentary elections, specifically in respect of reserving the right to announce the result of the poll;  
- Recognising in law the role of Borough Returning Officer at elections of the London Mayor and Assembly;  
- Clarifying the inspection arrangements for election documentation following an election; and  
- Clarifying the arrangements around deferring publication of the electoral register where an election occurs during the defined canvass period. | 8 |
| 2017 – 33 | The processes for the registration of political parties should be fully reviewed in order to:  
- Provide certainty to Returning Officers as to deadlines applicable to new and amended party descriptions and emblems; and  
- Maintain a list of official party and campaigner email addresses which can be made easily available to Electoral Registration Officers for queries and/or the secure transfer of data. | 8 |
Appendix A

The Association of Electoral Administrators

A1. The AEA was founded in 1987 and is the professional body representing the interests of electoral administrators in the United Kingdom. It is a non-governmental and non-partisan body and has 1,899 members\(^{12}\), the majority of whom are employed by local authorities to provide electoral registration and election services.

A2. The key aims of the AEA are to:

- Contribute positively to electoral reform within the United Kingdom;
- Foster the advancement of consistent and efficient administration of electoral registration and the conduct of elections in the UK;
- Raise the profile of electoral administration both within the UK and internationally; and
- Enhance and maintain the AEA’s reputation as the leading professional body for electoral administrators within the UK.

A3. The AEA supports and advocates two key principles set out by Gould\(^{13}\) in his report on the 2007 elections in Scotland, namely that:

- All those with a role in organising elections should consider the voters’ interests above all other considerations; and
- Electoral legislation should not be applied to any election held within six months of the new provision coming into force.

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\(^{12}\) As at 5 July 2017  
A4. The AEA has published several reports on the administration of the elections that took place across the UK, as follows:

- 2016 report on the administration of the elections held in May and June's EU referendum – Pushed to the absolute limit: 2016 – the electoral year never to forget;²⁴
- 7 May 2015 – Elections and Individual Electoral Registration – The challenge of 2015²⁵;
- 15 November 2012 – A question of timing? The administration of the Police and Crime Commissioner elections in England and Wales²⁶;
- 5 May 2011 - The administration of the referendums and elections across the UK in 2011²⁷; and
- 6 May 2010 – Beyond 2010: the future of electoral administration in the UK²⁸.

A5. The above reports reflected on the experiences of those tasked with delivering elections and referendums within an increasingly complex and challenging environment. This has continued to reach new levels of challenges, with the extraordinary UKPGE following the May 2016 polls, the EU referendum being held after the polls in May 2015, along with individual electoral registration and other legislative changes.

Report evidence gathering

The findings and recommendations contained in this report are based on a range of evidence.

Real-time reporting

A reporting button was placed on the home page of the AEA website on 8 March 2017 to gather real-time evidence. Initially, it was set up for the May polls but once the UKPGE was announced, the same reporting button was used to gather evidence in relation to both events. It was available until shortly after the UKPGE.

Members could alternatively click on a hyperlink that was included in the AEA newsletter each week.

The e-forms were pre-populated with the member’s name, local authority and contact details. The member only had to complete their job title and the details of the issue, including which election, comment or change and, for the May polls, which elections were taking place in their local authority area.

If members were limited for time, they could give a summary and request a follow up call after the UKPGE.

In addition, members were able to email the AEA direct using the reporting@aea-elections.co.uk email.

The majority of the submissions received through the reporting button and email routes were forwarded, anonymously, to both the Cabinet Office and the Electoral Commission on the day they were received to note and/or action as appropriate.

Post-election reporting

The methods used for post-election evidence-gathering were:

Online survey of AEA members

The AEA published two versions of an online survey questionnaire: “May and June polls” (consisting of 32 questions) and “UKPGE – June poll only” (31 questions), which included feedback on all aspects of the elections.
The survey went live on 12 June. All AEA members received an email with the links to the survey and responses were accepted up until 10 July.

**AEA branches post-election review workshop**

The majority of AEA branches held a post-election review as part of their branch meeting or as a workshop following the June polls. After each branch meeting or workshop, the responses were forwarded to the AEA for consideration and inclusion in this post-election report.

**National One Day Seminar**

The AEA held a National One Day Seminar on 3 July 2017 in Newcastle/Gateshead. The event was very well attended, particularly given the time of year and the fact that electoral administrators had had very little opportunity for time off over the past few months.

The agenda for the day included several sessions with speakers including discussions which were linked directly to the UKPGE:

- The UK Parliamentary General Election – the Administrators’ Perspective;
- The UK Parliamentary General Election – the Stakeholders’ Perspective,

One of the highlights of the day was the Keynote Speech by the Minister for the Constitution, Chris Skidmore MP.
## Selected feedback from AEA members

### Specific challenges presented in 2017

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<th>Challenge</th>
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<td>The production of data for print house while still preparing for May elections caused difficulties.</td>
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<td>The overlapping of the County elections with the UKPGE caused significant problems and created the most difficult and stressful working conditions I have experienced not only within the electoral field (20 years) but in my working life (30+ years). Whilst the timetables did not overlap the work did.</td>
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<td>Complexity of cross boundary issues with no time to have usual detailed meetings. Within 15 minutes of announcement we had electors ringing asking when their postal ballots would be sent out due to holidays etc. Massive issues of overlapping County and Parliamentary Timetables and need to swap between elections/timetables for everything adding additional risks in getting things wrong. Unable to process some applications until after the County deadline had passed, due to uncertainty of how the software systems would cope with the overlap. Massive surge in registrations in few days before May election pulling staff away from usual election duties. The additional hours the elections team had to put in when they had already been working additional hours in the lead up to the County. We are small team and these constant back to back elections and referendums with no time for proper breaks is not good and will take its toll if we are not careful.</td>
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<td>Phone calls from electors increased and was having to deal with extra requests for postal votes and having to explain that the ballot paper would be sent out on a specific date and checking the elector would still be at home to receive them.</td>
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<td>The challenges were recruiting polling and count staff and booking polling venues at such short notice. We usually take 4-5 months to prepare for an election, we only had 6 weeks, which was absurd. We also encountered problems with elections staff having leave already booked, which then had to be cancelled.</td>
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<td>To sum it up in a simple sentence - it was horrific. Somehow, I and my small team have managed to deliver nothing short of a miracle. I'm not a glass half empty kind of person - I'm very happy go lucky but this has just taken everything I had to give and more. I feel like I just need to take some time to digest what we have been through and then decide whether this is still a career that I want to do.</td>
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<tr>
<td>Trying to organise something that normally takes 6 months in 7 weeks means everything is a challenge. Arranging polling stations, incurring additional costs due to the cancelling bookings. Staff being on annual leave, so under staffed. Data for postal votes and poll cards being sent prior to 4th May meaning added stress before first polling day. Electors getting confused due to closeness and throwing away wrong poll card and/or postal vote.</td>
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Biggest issue was overlapping timetables - election called and point of last registration for May polls. Unplanned spike in activity which had to be proactively managed for May elections. In truth, we should expect a snap parliamentary election to be high profile and challenging - however, we should also expect that all stakeholders (CO and EC etc.) be on the same page as us. Instead I was challenged by the EC on my despatch date for overseas postals. Printer capacity was a problem - my PV pack printer could not manage all of my run on data and I had to make do with putting packs together in house which is resource intensive. Biggest challenge remains cross boundary areas. I take on from one authority and give away to one authority and we all run different electoral management systems. The integration does not work (out of the box) which makes everything very hard.

Complaints from overseas voters that their postal pack did not arrive on time - the deadline for overseas electors to apply for a postal vote should be reviewed. Voter perception that poll cards and postal vote packs can be issued ad hoc. More information about the processes to follow when electors register, apply for postal or proxy postal vote, how to vote and other general information is required. Royal Mail delivery issues for electors (poll cards) and returned postal vote mailers. Only after the local sorting office was contacted did the 12 additional postal vote mail crates arrive.

A year's planning work had to be done in 35 days, people had leave booked, but despite this as usual we delivered but it was extremely stressful and hard work.

Schools used as polling stations had already taken all of the designated training days, GCSE exams were scheduled for the day of the election, polling stations had to be moved. Unreasonable hours had to be worked by the core team over 7 days every week to meet the demands of the UKPGE. Staff were brought in from other services and trained on specific areas of work to achieve maximum productivity and performance, this added risk to the process. Shrinking council: services and staff we would ordinarily rely upon have left the council, loss of expertise, we had to use different services and people who needed more resource intensive training in the limited time period. This will continue to be a problem as the Authority reduces in size and experienced staff leave.

I don't normally complain but the number of hours that I have had to work in order to get 6 months' work completed in 6 weeks has taken its toll physically and mentally. I now feel that if another UKPGE is held that I will have to submit my notice as it is unreasonable to expect this amount of work and stress from anyone. I am now 57 and have worked in an elections environment for 16 years so I don't say this lightly but I cannot do another UKPGE especially if it is called at short notice.

We consider ourselves very lucky. We restructured the team in April 2016 and we now have a dedicated registration and elections team. Clearly, there is a lot of overlap but it does mean that we have sufficient staff, at the appropriate level, to deal with different aspects of the service. However, this structure is only funded for the next two years and we will need to revisit it at the end of the two-year period - i.e. one year from now. As a structure, it can appear top heavy as we have a management team of five, but we deem it be essential and this is what got us through without major issues. We also have a pool of staff to call upon to assist us - trained staff that we have used for a number of years now, so that they can come in and do what is needed to be done. This is against council policy and does not comply with recruitment policies, but it is a key part of our operational activities. Individual members of staff were concerned about the impact on their health, pre-booked holidays etc. but this structure allowed all team members to take their planned holidays.

In addition, our printers were either unable (or unwilling) to negotiate on despatch dates for poll cards or postal votes - we were effectively told when they would be despatched.
We also had staff who cancelled holidays to make themselves available and although we are able to claim any money lost to return to them it should not go unacknowledged the sacrifices they made.

### Feedback on Electoral Commission

The availability and quality of guidance from the commission on the whole was very good. Availability of candidate nominations documents and information could have been slightly earlier but understand that a snap election does cause problems due to time restraints. Guidance available for Returning Officers was also of good quality and availability of information was in a timely manner.

Integrating the Mayoral Elections guidance with the local electoral guidance made it difficult to follow and use in practical terms. UKPGE guidance was fine.

They did their best with the time available. Their guidance is excellent and well presented. Performance management was as low-key as possible, which helped. They seemed to understand the situation we were all in as sensitively as possible and kept a respectful distance, as such. Liaison officers are always helpful.

I also think that the EC need to have more stringent vetting procedures for EC observers at counts, especially in today's current climate and security concerns that we all have to deal with. For me, unless they are employed by the EC or they have a specific reference from someone in the EC then you can't just be given a pass to attend a count as an observer.

Given the circumstances our opinion is that the guidance was timely, knowing that the short timetable affected us all. It appears that the Electoral Commission were aware that EROs and AROs etc. were under pressure (as much as them) and performance reporting was kept to a minimum with expectations set out clearly and appropriately.

The guidance itself is great - it's just sometimes hard to find what you need. Credit where credit is due too - they also only had 7 weeks' notice, and the fact that, for example, we all got polling station handbooks deserves a big thanks.

We knew there was a chance for a Parliamentary Election and had prepared what we could. I felt the EC could have prepared more as we still had to wait for guidance updates.

We thought there may be a snap general election and prepared as much as we could in advance, I feel the EC didn't seem to be as ready and we had to wait for information to be updated.

Quick response to emailed questions. Guidance was issued in good time despite the short notice given. Managing performance approach was okay and didn't put an additional burden on us.

### Feedback on Cabinet Office Elections Division

Fees and charges guidance came out approximately two weeks after the completion of the June polls this cuts in to six months we have to prepare our accounts. As we have six months to complete a claim regardless of how many elections we have conducted shouldn't the claims unit have the same deadlines? I have had questions on my European Referendum accounts but nothing (even though I was light touch and underspent) on my PCC accounts. Decisions about what will and will not be covered in the accounts need to be made quicker as we do not have the added chance to ask for further advances for snap elections.
Timescales for UKPGE meant that printers took a definite position of despatch of poll cards and postal packs which was not necessarily in the best interests of the elector i.e. 2 batches only. Pressure through suppliers group / Cabinet Office on this matter would have been helpful.

It is disappointing that we are still waiting for the fees and charges guidance from the CO.

It made me smile that I got an email regarding observations on my EU accounts on 12 May. This really was ridiculous, particularly as one of the comments was that they had corrected the VAT on one item. Was this really the time to get in touch?

Fees and charges were a joke - how can they A) be wrong and B) given so little to run a snap election where no bargaining for services can be done and we paid staff more at the Referendum.

Fees and charges - very late in the process. Still waiting on ECU claim forms.

Fees and charges - late. And why on earth did they go ahead with the issuing of endless questions about small potatoes issues with the EUR accounts in the middle of a snap UKPGE - particularly as, let's face it, we'll all be waiting for the final response / final sums for months. Liaison with Royal Mail must have been entirely non-existent, as they were serially rubbish - by far my biggest problem with this election. I imagine this will come up later ... but a total shambles. Same issue with their comms as for the EC - not always easy to find what you are looking for in a previous bulletin.

MRA for one constituency was incorrect leading to 5 FOI's and 4 media enquiries. No-one answered at the fees and charges section, so I contact another person who pointed out the error. This led to a revised MRA schedule being sent out, with no thanks or acknowledgement.

Still waiting for the guidance notes and the scrutiny levels for the UKPGE would have liked to get on and do accounts as we run straight into annual canvass.

The interference by the cabinet office regarding the timing of the sweep has serious consequences. We had to fight to get an earlier sweep delivered at 8:45 pm and we were not expecting a final sweep, however on the final sweep the delivery driver managed to get lost and arrived with the postal votes at 22:11.

Feedback on Cabinet Office Modern Electoral Registration Programme

On the whole, we had no issues with the performance of the digital service but we did have a high number of duplicate applications made from electors who were already registered to vote. This is the same behaviour we witnessed in 2016 for the referendum. Many electors were making new applications to be registered when they were in fact requiring us to make minor amendments to their existing electoral registration details such as middle name amendments, or requests for postal vote applications.

Whilst the digital service is very good, a solution needs to be found in relation to duplicate applications. Tired, overworked staff processing high quantities of registrations late into the night to meet the electoral deadlines associated with an election, to find out that 50 - 60% are duplicates. This is not only a waste of time but also adds to the pressures small electoral teams face, and this at a critical time of the election process. If an elector applies online they should have to provide an email address for us to respond to, this should not be optional.

The digital service worked OK, but still lots of duplicates.
Duplicates still a big issue and needs sorted ASAP

I was impressed with the speed that plans seemed to be adopted over the election period by the MERP. The additional file runs worked really well this time and the date range that these covered were spot on for us. The additional information about not re-registering on the Register to Vote website was welcomed, although I’m not sure how effective it was looking at the number of duplicate registrations (42% of our 2,102 on 22nd May were duplicates). For the May election, the MERP scheduled some maintenance work on their website which would have resulted in downtime during the day, just as our poll cards were going out and when people are more likely to register to vote. This was then moved to overnight and hopefully in the future, any maintenance work around election time will be done at a time when fewer people are registering to vote online.

Welcome that national database where voters can check their registration status. We had electors calling us to tell us that they had registered several times - just to be certain! Duplicate voters were in the region of between 50-60% each day.

Funding arrangements for 17/18 suspended by election, leaving real uncertainty going forward.

Overseas electors need to be educated and they need to appoint a proxy or have a current postal vote and to be realistic in their expectations as to when they will receive this. Many think completing the online registration then entitles them to one or the other without completing a further form.

The duplicate issue MUST be addressed. The additional info on the registration site did not appear to help. We received 9000 applications on deadline day, 3000 of which were duplicates. We were still processing these at the end of the following day which then impacted on how quickly we could process late postal vote applications. Something has to be done. The system could recognise electors by IP address/DOB/NI No. and inform them they have already applied within a certain time period and to check with their local authority before they re-apply.

Feedback on Royal Mail

Liaising with Royal Mail was very good for both elections. The receipt and collection of the writ went well, it was delivered on time and collected OK. We had a lot of issues with voters on non-delivery of poll cards and some postal packs but difficult to quantify as I know people lose them. For the amount of postal ballots delivered on polling night the sweep is a waste of money, the person delivering them from Royal Mail had no idea what they were or the importance of the delivery and we still had some delivered the next day.

We did have concerns about the effectiveness of the Royal Mail international BRE as many of our overseas electors failed to return their postal votes in time using the pre-paid return envelope. We had no concerns about the outgoing envelopes being sent abroad as we were aware that the vast majority of these reached electors within a few days of being dispatched. We received a significant number of international postal votes the week after the election with date stamps up to a fortnight before the poll, leading us to believe that there may have been problems with the international response service.

Royal Mail performed very well in delivering returned postal packs back to the office in respect of the Parliamentary election but not as well for the County Council election. On at least 2 occasions I did not receive the postal packs until 2pm despite signing up to a 9am delivery. This may have increased the cost of opening as staff had to be sent home early for a 3-hour session.
Very happy with Royal Mail for the mailing plan. They were also flexible when collecting the writ. No problems with them throughout the process.

Service for May elections extremely poor - consistently late deliveries, on one occasion delivery was made to the wrong local authority offices and there were surprisingly high numbers of postal votes delivered after the close of poll. Service did improve for Parliamentary election. Writ arrangements were fine and well communicated.

Received numbers of complaints about non-receipt of poll cards and, more worryingly, postal vote packs. This resulted in numerous re-issues of postal voting papers. So an increased workload. Also, the last minute 'sweep' to collect the last postal vote returns resulted in far fewer returns than expected.

OMG - where do I start? An absolute shambles from start to finish. 1. Significant increase in the number of complaints regarding non- or late delivery of postal ballot packs. Some can obviously be attributed to the difficulties of getting post to Timbuctoo - but definitely not all of them. 2. Timing of the Royal Mail sweep - mine was at 9.50pm. When I was originally asked for a time that suited, I provided that (I think I said 8.45pm or 9.00pm). They then sent me confirmation of 9.50pm anyway, and wouldn't change it. Two issues - a) why ask for our preference in the first place if they are going to be ignored, and b) have they no realisation of the fact that just before the close of poll / as you are trying to get the count up and running / at the same time as the last votes from polling stations come in is completely useless to us? 3. My biggest moan (sorry!) - the non-delivery of ANY postal votes to my office on Friday, 2nd June. And the lack of any taking of responsibility for this since - simply not good enough.

Royal Mail on the whole were good, and particularly on Election day they were very quick and helpful responding to queries. The two issues we did have with Royal Mail were: 1. There were a large number of postal packs reported as "lost" never having been received, particularly in one small area where 97 of 450 packs were not received. I checked the details with our printers who claimed that all the packs were printed and given to Royal Mail, however, having checked with Royal Mail they have also claimed that everything was sent out from their delivery offices. I feel like there is no real facility at the moment to identify where the problem has occurred with issues like this, which means there is no way to improve the delivery for the next elections. 2. We planned our count processes around the final delivery time for the final sweep from Royal Mail that was agreed early on, approximately 10 days before election day, Royal Mail advised us that the final sweep would actually be delivered 1 hour 15 mins later than we had agreed. As we have a large geographical area, we have four devolved count centres some of which are approximately 1-hour drive from the delivery point for the final sweep, this had a fairly big impact on our count procedures. I understand why they did this, to maximise the number of postal packs processed, however we would have preferred to stay with the original agreed delivery time.

Total mess up on Friday before the election. Only a handful of postal votes delivered and took all day to get an answer about that day's post. Somebody at the sorting office messed up, so we had to have a double opening session on the following Monday. Delivery on polling day came, but the driver freely admitted his manager wasn't going to allow the delivery till the Friday, as they hadn't been weighed.

For the 3 constituencies, we only received 55 packs. How can this be a final sweep when we receive 100 packs the following day?
### Feedback on print suppliers

Did as well as could be expected. Prices went up though!

The capacity of print suppliers is worryingly limited. Our print suppliers are very good but became obviously stressed during the run up to the election.

The only bone of contention has been the dates we are required to send them data which was also a problem last year for the referendum. They required our first run of poll card data on 21 April (for posting on Monday 8 May) and our first run of postal vote data on 28 April, for issuing on 24 May. This is ridiculously early and allows almost a month between generating data and the production and dispatch of materials. Having to generate our data so early for both poll cards and postal votes meant that we had more registration changes to make in the run up to day-12 and day-11. On the plus side, [they] were very accommodating in allowing us a third run of postal vote data after having only arranged two dispatch dates with them in advance. Due to a very high number of postal votes received on 23 and 24 May, I concluded that it wouldn't be feasible to produce the packs in-house as planned and asked [them] to produce them, which they did.

The short notice of the election caused problems with print suppliers acquiring stock and finding the right staffing levels.

Dictating the timetable and at one point telling me that I could not have my postal poll cards on pink card, but I would not back down on this.

We felt the supplier of our printed material coped well. Some paper stocks were not available at short notice, which increased the price of poll cards, but that was a factor beyond our and their control. They managed to produce what was needed, to a high quality and standard under much pressure.

Suppliers under much pressure, same as us, when snap election announced. But they also pulled out all the stops to make it a success for which they should be commended.

They bent over backwards to assist us but did restrict us on when we could send data and they could send poll cards, postals out.

Because of the short notice of the election we had to accept the arrangements provided by our print provider, such as dispatch dates, with little room to manoeuvre. Our postal votes were sent out much later than I would have liked but my print provider said that these dates were all they could offer.

Because of the short lead-in time for this election there was very little flexibility on dispatch dates. We were effectively told by our printers when we could expect our poll cards and postal vote packs to be despatched.

### Feedback on other stakeholders

We did experience a few problems in respect of the cross-boundary arrangements in place with the local authorities who we share constituencies with. Staffing was the main problem as we had arranged with the 3 authorities who we take in from, that they would provide us the staff to man the polling stations which fall within our constituencies. We struggled to recruit staff to our cross-boundary polling stations.

Unreasonable expectations of the Claims Unit - expecting a response to observations on the PCC elections within 14 days while dealing with nominations for the County elections.
Regarding expenses I feel aggrieved that we have 6 months to submit our claims, especially as yet again we have two to do in a short space of time and WHY do the claims unit not have a deadline to complete our claims. Still waiting for PCC and Referendum to be settled. Not good enough.

We received first comments for both within two days of each other just as the Notice of Election went up for the elections on the 4th May. They appear to not understand that in a small authority there is not scope for just doing this especially when you are running an election. Also receiving reminder during this period and again once the UKPGE was called. There appears to be similarity as to how they they have assess each set of claims as well.

Feedback on the AEA

The AEA Bulletins were very helpful, focusing only on the relevant details and guidance for specific tasks along the short period of UKPGE planning. This was good in terms of saving time looking for guidance and legislation etc. while heads were still in Scottish local government elections mode. Much appreciated.

Really liked the AEA Parliamentary bulletins - had a good couple of reminders of things that nearly got missed.

The AEA daily bulletins were invaluable - an excellent source of information and a good way of keeping on top of what needed to be done and when. They also helped to clarify a number of issues which were raised.

The bulletins for the UKPGE were very helpful indeed - a great idea!!

The AEA provided some much-needed support, particularly over the parliamentary election. The election bulletins from the AEA were very helpful in providing clear and useful messaging as well as consolidating updates from EC and CO. These updates would be appreciated at any future polls!

Staffing

I would say the tiredness of the core staff, making silly mistakes as you forget which election you are working on, we had four elections in seven weeks, and the amount of hours in a day we were working. Understanding how the different EMS systems work and handle the data that you either receive or give to another authority. As we give and receive at the UKPGE’s it was really difficult in keeping up the amount of times someone wanted data running and we cannot read that can we have this or we thought it might do this etc.

One issue we had for the UKPGE was the number of call-offs immediately prior to polling day (five, I think, on Wednesday 7 June).

The amount of time, effort and sacrifices that myself and my team have had to make over the recent elections has been unbelievable. With regards to polling station staff, this is getting more and more difficult each year to find enough and experienced staff to carry out these roles, particularly as there are less people working for the authority due to job cuts.

Difficulty recruiting extra staff for UKPGE at short notice. Lack of available counting staff meant many of the staff employed on the poll carried on through the night.

Staffing seemed difficult, with people dropping out very late (latest being a count assistant at 8.30pm on 8 June).
Great stress on running the Parliamentary election immediately after the huge local elections where we had 1,000 candidates. Return of election expenses deadline was 9 June - really bad timing. Core staff absolutely exhausted and put their work life before their family life - since March.

The pressure put on elections teams was immense and for a period from March till June 8th we were working 12-13 hour days and some weekends. Remarkably the 2 elections seemed to go well but I can tell you at the age of 55 and after working in elections for 23 years I do not wish for this kind of thing to happen again and I am seriously thinking of looking for a different job even though I love what I do. A final note I had a holiday booked for the end of May which I cancelled.

My core staff are exhausted which is not a surprise. However, I won't moan about it. It is our job to run elections and we rose to the task excellently. All core staff have worked tons of hour's overtime, and some of them are part time staff!

Staff worked long hours to ensure registration, scanning, processing, emails and phone calls were kept up-to-date. Two full-time temporary staff were engaged for 4 weeks to assist with post, scanning, printing, phone calls and filling up ballot boxes.

The impact on the core electoral services team in my view has been ignored by the Government for too long. It feels as if we have been taken for a ride and that we are expected to rise to increasingly complex tasks with no time to do it. If we continue in this vein the issues we have seen in Barnet and Newcastle will soon multiply over many more councils as experienced members of staff leave the profession. I have already had one member of staff tell me that they will not be doing another general election and given the state of the country it could be called at any time. Calling an election with this much notice right in the middle of the local elections is reckless and but for the hard work and dedication of my team it could have gone horribly wrong. Elections are being run by the goodwill of a small group of dedicated teams throughout the country and that goodwill is quickly running out. With regards to staffing we had to write out to all staff members as soon as the election was called. This is the time of year when many people go away on holiday and one member of our core team had the week of the election booked off ages ago. This meant that we could not meet the Electoral Commission’s polling staff ratios as we had no time for a recruitment campaign. It also meant hiring some first time Presiding Officers which is not ideal (we had the same issue for the referendum last year). It also meant we had to use online training for the first time, which actually worked well but was a risk I would preferred not to have taken for such a major election. The cross-boundary organisation caused some issues as we had less time to prepare and understand what was required at each stage.

The overall impact on the core team was lack of a life outside of the election. We lived and breathed elections solidly for the period in order to deliver. We all talk about the election but the impact of registration is immense and whilst we are trying to complete all the necessary tasks around arranging an election and the count, registration just goes on in the background - but it is huge. The amount of time it takes to deal with registrations is just off the scale.

Intensity and requirements of the workload (over a 7-week period), resulting in a requirement for the core team to work 7 days per week, unsocial hours, bank holidays and extremely long days. Personal sacrifices of the core team, cancellation of existing arrangements planned holidays (including main annual holidays) and no or limited time with families. Whilst this is expected for scheduled elections the impact was greater on team members and on their families/dependents due to the lack of notice.
A huge amount of time was spent this year answering email queries - sometimes hundreds in a day. In the age of the smart phone, it may be fantastically easy to email the council "am I registered to vote", but since these kinds of queries are on top of everything else that comes in, more resources need to be made available. We did it, but only by the main electoral team working 50-60 hours a week for 7 weeks. Something we feel morally obliged to do. Colleagues who've been doing the job longer than my 3.5 years tell me it never used to be like this.

We also had problems getting temporary staff trained to a suitable level to deal with telephone enquiries - we were called incompetent on many occasions due to the issue dates for postal votes, even before the close of nominations!

Our team of two worked 11 / 12-hour days and also weekends just to make it possible. We were not perfect but we did as much as we could. We have forgotten what our friends and family look like!

The core elections team consists of 4 members of staff including myself. In 6 weeks, we have clocked up 429 hours of overtime between us. This equates to 59 extra days work for the elections team alone. I'm very lucky, I have a dedicated team that were willing to give up their families, their pets and all other important stuff to deliver this election. In 2015, [authority] had many issues with their election and the core members of the team who lived through 2015, showed strength, courage and determination to go through this process again. To their credit a robust and transparent election was delivered. This is just the tip of the iceberg. The contact centre increase their hours to deal with the call demand, ICT provided out of hours support, legal team took over postal vote opening, buildings assisted with all the training and dealt with customers who had their rooms cancelled so that we could provide training. Experience was key, however again training on the job was required. I am proud of my council, my team and the excellent election we delivered.

Accommodation

We were fortunate to only have two polling stations un-available but finding replacements in time to send out poll cards as soon after notice of election as possible was difficult.

Thankfully most of the venues worked out. Though schools were not happy about being asked twice so close together and some chose to close because of the terrorist incidents.

Schools which operate as polling stations put up the most resistance to us using them for another unplanned poll (there was still a lot of resentment for the 23rd June poll last year) and a number of them formally requested that we look at alternative venues as part of the next polling places and polling district reviews. We would really welcome a statement from the Government or some advice issued centrally on the position for booking polling stations and the obligations the venues are under when ensuring that they are available for use at national and local events.

The fallout from the closure of schools twice in 2 months was an issue. We didn't have any problems with the schools themselves, but complaints from parents were received.

Some issues with secondary schools for the GE because of national exams.
School exams meant we had to hire more mobiles at a secondary school. Get a lot of flak from parents when we use any school premises and having 2 elections so close in both May and June, bought a few complaints. Count centre - had to hire a marquee to attach to sports hall giving us enough room to receipt in ballot boxes and get the count underway at 10pm.

One school refused us access and even with education office help we were not able to use it. One school kept security gates on all day so that each elector had to buzz to get into the school. The schools were definitely unhappy.

Schools - they hate us, don't want us and will try and do anything to get us out. We have had to pay extra for some venues and we don't yet know whether or not all of this will be refunded. We had no time to look for alternative venues and simply had to pay whatever was asked for. We had 48 hours to book all of the polling stations and to start making arrangements for the poll card print.

Candidates, agents and political parties

Still a problem with tellers outside polling stations and their attitude towards electors even though the briefing session outlined the expectations of tellers. Issues regarding one nomination paper submitted by the agent - the candidate did not want her address on the ballot paper but this was only realised by the candidate after close of nominations and when NOP and ballot papers were produced.

Candidates do not want to wait until Notice of Election to get a register.

The behaviour of some tellers and agents at some polling stations left a lot to be desired. Arguments between parties, complaints from electors of bullying tactics outside the stations, quality of leaflets and what was either included or delivered along with the leaflets, to name a few issues.

Nominations period was too tight!! Candidates barely had time to submit their nominations and undertake our pre-check. Full resources had to be on hand to provide guidance and advice, as well as undertake pre-checks.

Tellers - caused many issues - electors not knowing they are not legally part of the process - tellers edging more and more into the station - when busy - PO cannot keep eyes on them all the time.

Electoral registration

We had extremely high volumes of registrations still including duplicates and people trying to use the GDS to apply for postal votes.

For the May election, the volumes were manageable for our team but a very different matter for June especially when a TV programme or debate was showing about the election. This caused huge problems with duplicates and the amount of time it takes to process them and around the deadline. Also, we had quite a few duplicates who had postal votes but on re-registration opted to vote at the polling station, but it was too late to change that. Also, voters requesting postal votes at a very late stage. EU Nationals very confused, thought they should be able to vote

...and as I have said before the on-line registration of voters - the EC/Cabinet Office must sort a way to stop people registering again and again when they are already on the register and been sent a poll card. Media need to be reined in as they are the main instigators - amateurs spreading disinformation.

The announcement of the UKPGE caused a tidal wave of applications.
5000 applications received since the parliamentary election was called 3000 were duplicates. More information required saying if you have received a poll card you are registered and do not need to re-register.

The election is second to electoral registration, we spend so much time on electoral registration now, it is a huge resource pull at election time and it just gets worse. Demand is huge and we are expected to work 24/7 to keep up with expectations. Working at evenings, weekends to reply to emails, phone calls, send out applications etc. So much more pressure. We worked extremely hard to succeed and we did it but the pressure will just build and build.

Volume of absent vote applications did place added pressure on the team. Some complexities in the requirements around overseas renewals and absent votes, and for refreshed identifiers for those rejected at the local elections could do with simplifying. There were still some complaints of overseas postal votes not arriving, although fewer than for the EUREF, and it would still be helpful if the application deadline for overseas was earlier. We worked hard to publicise mailing dates via email and the web and consequently when we did get complaints we could point out we had informed people, which was helpful.

Still ask the question - "why do we carry out an annual canvass??" Huge volumes of registrations at least a third were duplicates but wasting everyone's time in registering again.

**Special category electors**

A large volume of special category electors especially overseas applications were received as soon as the UKPE was announced. Processing such applications is lengthy and time consuming and meeting processing deadlines was difficult although managed.

We allocated a dedicated member of staff to administer the Special Category elector applications which was very successful although onerous.

Also, complaints received from Australian and New Zealand postal voters stating that they had not received their postal vote. It appears that there is only a weekly postal service to these two countries.

We had to remove 60 Overseas Electors whose registration expired on 1.6.17 ... so they were deleted. A number of them had already returned their postal votes which caused issues both for the RO and the EMS Supplier.

Overseas electors still had unrealistic expectations about receipt of postal votes with those who registered online as overseas electors and requesting postal votes, expecting their postal vote pack to be sent to them the next working day after making the online registration application.

The statutory timetable does not assist overseas voters and causes frustration for administrators and annoyance to the elector. Certainly, those registering on deadline day as an overseas elector is unaware of the risk that they may not receive and return their vote in time (due to the 5-day period to clear after registering - then a postal pack needs to be produced and sent).

I am of the firm belief that an overseas elector’s application should be considered incomplete without an absent voting arrangement, as this would remove the issue of these people calling us two days before polling day to complain that they haven’t received a postal vote that they didn’t apply for in the first place.
The election timetable needs to be extended to enable overseas electors to have a fighting chance of receiving and returning their postal votes.

The main issue is setting up overseas electors with absent votes. Overseas electors still don't understand that they need to complete an application to vote by post and think that by ticking that they want to vote on the website that they will automatically get one. This really needs to be addressed to make it clear what they need to do. We are also receiving a fair number of overseas postal votes back after polling day. If the Government really wants to allow all expats to vote removing the 15-year rule, they need to improve the system we currently have in place as it is not working for a lot of overseas voters.

As always, the timescale for Overseas Electors to receive their Postal Vote is very tight and unpractical sometimes. There is a huge impact on Late Registrations for Overseas Electors and lots of correspondence which takes up lots of time! Overseas Electors in general takes 1 person out all of the time during the Election purely dealing with new and existing Registrations and absent votes. We also had an impact on removing Electors before the Parliamentary Election if they hadn't renewed their application.

Overseas electors whose applications have been rejected previously due to non-registration will often make another application at the time of an election. They usually give a different address which has to be verified. This is time consuming and often leads to disappointment for them if they weren't registered. Homeless electors are a neglected category. They sometimes register at a friend’s or relative's address for the election only. They don't realise they can register with no fixed address. More support is needed to enable them to exercise their voting rights.

Beyond saying that the CO and Government continuing refusal to put the Homeless Connection form on line created a lot of unnecessary work for us dealing with the 120 odd LC forms we did get, and of course the fact that many sofa surfers and others of no fixed address wrongly believed they couldn't register.

**Absent voting applications**

Emergency proxies should only be allowed to be applied for up to the day before elections notifying presiding officers on the day is time consuming and in some areas, we have no mobile networks.

Highest ever emergency proxies. Still need them for hospital/funerals/childcare of other family members as we have to explain too so many people that they don't currently cover these situations and so people are being denied their right to vote. We had to contact lots of people as they were not aware that their proxy would need to vote in the electors allocated polling station and appointed people outside of the area which required postal proxy. Not enough information about proxies and postal proxies.

We did an early overseas dispatch for postal voting packs, but this was only for people who were already registered. The 2nd (and final) dispatch was too late for the new overseas electors. If they were resident in countries like Australia and New Zealand then we already knew they would not receive a postal vote in time. We were proactive where we had details and contacted the electors to explain and advise them to perhaps appoint a proxy. However, this is additional work that was needed when time really was of the essence. I think again there could have been much more guidance on .gov.uk/register-to-vote perhaps recommending proxies rather than postal votes dependant on Royal Mail zones (distance).
On the proxy application, it would be helpful if the notes could advise the elector that their proxy will have to attend the elector's polling station to cast their vote (unless they apply for a postal proxy). This would again put the onus on the elector.

**Postal voting**

We had some cross-boundary issues with data files between different software suppliers but we will talk to our software supplier about this.

May - Royal Mail sweep - 225 postal votes received at 9.35pm OMG most we have ever had on a sweep was around 20 before. Not impressed what the hell are Royal Mail doing? I may have made the postman a bit nervous with my display of shall we say 'disbelief' at this point in the day. June - Royal Mail - 2nd day of postal votes opening sessions (laugh not so much) Q. Has the post arrived? Yes. Q - No postal votes? No there were so many that Royal Mail will bring them tomorrow is that OK? Q What the hell do you think!! after a couple of calls over 3500 postal votes arrived with a very apologetic postman - very unimpressed.

The international business reply seems to work but production is expensive.

Cross boundary imports complex and difficult. Complex to reissue cross boundary postals.

Royal Mail sweep of 21:50 was felt to be a bit late.

We had reports from some overseas electors that their country’s postal service did not recognise the International Response Licence and, as a result, they had to pay for postage back to the UK. As usual, the Royal Mail sweeps only produced a handful of postal votes (21) and a similar number were received by ordinary post the next day.

Royal Mail sweep only just arrived with a few minutes to spare.

Several international business reply envelopes from Spain came back with "not enough postage paid" stickers on them.

IBR worked well although there were many that came back after polling day. Difficult to know whether the postal service just couldn’t get them back from vast distances in time or whether the electors just posted them too late.

Royal Mail's International Business Response Licence appeared to work better this time than in 2016 - we only received one complaint from an overseas elector in Germany that the staff at the post office he took it to did not understand what it was (the envelope is only printed in English and French).

**Managing the polls**

Cross Boundaries also cause confusion for electors especially for lost and spoilt postal votes.

Electors saying that they’d not received the Parliamentary postal ballot paper and that we had sent them a local county election paper again, when actually it is down to voter lack of understanding and Media confusion about voting for Theresa May or Jeremy Corbyn and because they were not on the ballot paper they were convinced we had sent them the wrong thing. This increased our re-issues as some of our voters actually tore them up then phoned to have a go at us. Media need to take responsibility and put the right messages across.
# Verification and count

I would suggest the close of appointments of Counting Agents should be moved to at least 14 days prior to the Count to allow time for tickets to be sent out. We have ticket only counts but with the extra security advice this meant putting back up plans for non-receipt of tickets due to the close deadline.

The Government really need to look at the rules governing the holding of the count within 2 hours of the close of poll. We mainly appoint fresh staff who have not been out on the poll all day but at least a third of our supervisors are also PO's and the elections team have had weeks of long days prior to polling day.

The 2am deadline at UKPGE is unhelpful. Even in a tightly compact urban area it it is not guaranteed. There are so many unpredictable factors; turnout; queues at polling stations; postal votes handed in; venue availability and therefore capacity; combination etc.

At the Parliamentary election in June we had no issues in counting by 2am but I do feel if there are combined elections then this is unreasonable to put this additional pressure on RO's and administrators.

Parliamentary: Overnight verification and count. Key staff had rammed in extra hours between the two elections and then worked 25 hour plus shift and no leeway for breaks due to small team and how busy the day was. Key staff were absolutely exhausted. Overnight counts due to media expectations should not be allowed we need to take a look at the needs of the staff who deliver these elections.

The police presence inside and out alongside bag searches were accepted by all as reassuring and necessary measures in the current climate.

Biggest concerns were around security after the events in London and Manchester. Good working with local police meant that we had a strong police presence in the building at all times.

# Post-election matters

The deadline for the return of deposits should be extended as most election staff spend the day after the poll recovering. Our staff worked a 23-hour shift on polling day as we were unable to take more than an hour’s break during the day. The Claims Unit and the Cabinet Office need to accept this was a very busy time and all election staff need time to recover.

Cabinet Office requirements for return of the lost deposits form and monies are unnecessary tight and these could be relaxed for future elections.

Timescale for returning deposits is not realistic - first working day after declaration of result. It would be helpful to have this extended to, say, seven days after declaration, particularly for the return of electronic payments.

Late notification of MRA's, which seem to be shrinking as costs rise. For the first time ever I will be overspent by about 10-15%. Why do we bother with scrutiny categories? It seems that if you are in the 'plain' or 'light' category, you just end up with more 'observation' queries to deal with and might just as well have submitted full accounts. Why do we strive to submit accounts within 6 months, when it takes them over 8 months to deal with it and ten months to finalise? What performance standards might we expect from them? What's the hurry with the deposits? Can't they wait a week?
This election is going to be expensive and going to be interesting how the claims unit is going to deal with the accounts.

I think the storage of elections stationery/ballot papers although not necessarily a big issue in itself is an issue in that the ECU won't refund you for the storage/destruction costs and I find this hugely puzzling. We are required to keep the documentation by law so not sure what else we are supposed to do with this nor why we can't be refunded by the ECU!

Writ is archaic, unnecessary. Why can't this be done electronically in this day and age. Margin for error too great with paper copies and tired staff. Timescales for completion and collection ridiculous.

However, I did not appreciate the emails from the ECU chasing me with regard to their observations from the 2016 polls and giving me 14 days to respond when they must know we were so busy. I was told when I submitted the accounts for the PCC election that they would be dealt with the first week in January so when I wasn't contacted until the end of March and was told I had 14 days to respond I was not too pleased!

Claims unit sending observations from PCC election claim submitted in August 2 days before the June election and asking for a response in 21 days. Election staff need a break or holiday as we have worked through with no leave from March. Working long hours and need some rest.

Storage of stationery an issue, as we'd hadn't had time to dispose of PCC 2016 or EU REF 2016, before packing away County 2017 and adding in PGE 2017. A lot of clearing up to do! Do have concerns that funding will not be sufficient for the PGE and have already raised this with ECU.

Storage costs are not recoverable I think this is wrong. Why should the local authority end up paying for this?

Just a local storage issue of not being able to destroy the EU Referendum archived items until 23 June, yet now have the UKPG and 04 May items to store i.e. 3 election's worth, when the maximum room is for 2 elections.

**Electoral registration funding**

There should be an allowance in the accounts at elections for the increase in registration prior to a major national election. Also, the longer hours we have to work to cover not only registration but the extra postal votes we have to deal with. It is unfair to expect the local authority to deal with this extra cost when all our budgets are being squeezed.

I feel there should be additional funding available for the ERO to assist in the additional cost of processing the AV's and Proxies for a GE, especially as the majority relate to only a single election, which we would not have had it not been for that election.

Registration cost not being included in Election accounts. When registration increases from business as usual levels to thousands in a few days due to a pending election this needs to be taken into account by the ECU. These registrations would not occur if it wasn't for the election.

Postal and proxy voting volumes increased dramatically. Very large number of temporary. It is not right that processing and postage can't be charged to the election. It is not a registration cost. They would not be having a postal or proxy if there was not an election. Impact on staff have to employ temps to process these forms but cannot charge their time to the election and therefore local authorities are funding national elections or not allowing us to employ enough staff to deal with these.
## Legislation and potential changes

<table>
<thead>
<tr>
<th>Not enough - the Council should not have to subsidise when a general election is called - a lot of time was taken up on dealing with duplicates etc.</th>
</tr>
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<tbody>
<tr>
<td>CO suspended the funding when election announce for 17/18, no indication when or if this funding will be paid, real uncertainty on the future funding position despite the current expensive system likely to be in place for the foreseeable future</td>
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<table>
<thead>
<tr>
<th>Time table still too short for a PGE due to IER steps!! Need a few extra days still - only a week to see all 15 of our PGE candidates!!</th>
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<tbody>
<tr>
<td>The timetable is still problematic especially in relation to overseas postal votes (application, despatch and receipt).</td>
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<tr>
<td>An online portal to check if people were registered would cut down on duplicate applications.</td>
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<tr>
<td>I think HNL's are almost certainly the way forward, though whether these will be considered is another matter.</td>
</tr>
<tr>
<td>The Parliamentary election timetable should be reviewed in relation to overseas registration matters, both for deadlines for registering to vote and applying for postal votes.</td>
</tr>
<tr>
<td>Now that electors can register online, provision must be made for electors to check their registration status online. Many electors that we spoke to could not believe that they could not do this. Overseas electors should not be offered postal voting, but should be required to appoint a proxy or, as other countries do, voting should be made available at British embassies.</td>
</tr>
<tr>
<td>Still would like to see pressing ahead with a single piece of legislation for all levels of election.</td>
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