

## The 2019 UK Parliamentary General Election – delivered on time for Christmas

### An AEA Position Statement

#### Executive Summary

This report assesses the UK electoral landscape following the unscheduled UK Parliamentary general election on 12 December 2019. After an unprecedented year, the fragility of the electoral system is more apparent than ever, the expectations of citizens are not being met and the resilience of the electoral community to deliver is being tested.

In our previous September 2019 report, we referred to the growing potential for a further unscheduled national poll during the annual electoral registration canvass. This was confirmed on 31 October when legislation set the election date, giving the electoral community just over five weeks to deliver the second unscheduled and highly scrutinised national poll of 2019.

The issues and examples raised in this statement have been informed by the experience of our members. Legislative reform is required to mitigate the unique issues caused by holding a national poll during the annual canvass, and alongside the compulsory review of polling districts and polling places.

A range of unintended consequences and logistical challenges arose from the election date. These added significantly to the pressures electoral administrators were under and, in some cases, impacted directly on the service delivered to and expected by electors.

Problems such as postal votes for overseas voters and duplicate online voter registrations are perennial. Looking ahead, constituency boundary changes and voter ID will introduce more complexity and risk. Root and branch reform is needed more urgently than ever.

We now put five new recommendations to government, covering:

- harmonising timetables for concurrent national and local elections to take account of devolved nation bank holidays
- permitting polling district and polling place reviews to be extended if an unscheduled UK national poll or referendum is held

- allowing the publication of the revised register of electors to be delayed if the Notice of Election for all polls is published during the canvass
- reviewing the registration system to improve voter experience
- ensuring electors understand which polls they can vote in.

These join outstanding recommendations from our previous reports which we continue to call for action on. All recommendations can be found in appendices at the end of this report.

## Purpose

- 1.1 We make this statement to the UK Government to highlight the huge challenges faced by electoral administrators and other key stakeholders in delivering another unscheduled national poll with, on this occasion, additional seasonal challenges.
- 1.2 Following the delivery of two unscheduled national polls in less than twelve months, and with local elections meaning three polls in many areas, it is clear that those who administer the UK's electoral system are close to breaking point; and that urgent action is needed to ensure the continued delivery of safe and secure elections.
- 1.3 This document builds on our earlier statement and recommendations '[The Electoral Landscape in 2019](#)', published on 16 September 2019. Whilst its receipt has been acknowledged, no formal response has been received. Now that the general election is out of the way, we would expect Government to respond positively and quickly.
- 1.4 It is disappointing that many recommendations from our [previous reports](#) remain unresolved. Whilst not repeated in this statement, they remain on record and are shown at Appendix C. A list of previous detailed reports giving background information to these outstanding recommendations are included at Appendix B.

## 2 Background to the 2019 elections

- 2.1 Thursday 2 May 2019 saw local government elections take place across the majority of England and Northern Ireland. On 5 April, the Prime Minister announced that an Order would be made setting the date of the European Parliamentary elections, subsequently held on Thursday 23 May.

- 2.2 Following the May polls, the electoral community continued to deliver business as usual, including post-election work, conducting the annual canvass in preparation for publication of the revised register of electors on 1 December, planning for canvass reform implementation in Summer 2020 and completing the statutory review of UK Parliamentary polling districts and polling places, which had a deadline of 31 January 2020. This was all alongside growing conjecture of a UK Parliamentary general election, with numerous dates speculated upon.
- 2.3 Parliament debated the prospect of an early UK Parliamentary general election on 29 September. Legislation was passed on 31 October setting an election date of Thursday 12 December. This gave the electoral community a little over five weeks to deliver a third general election in five years, just two weeks before Christmas.
- 2.4 This statement looks at the specific issues which arose, providing examples where appropriate.
- 2.5 As highlighted in our [previous statement](#) *"there remains an unrealistic expectation that elections will always be delivered regardless of the landscape, timing, funding or capacity of the professionals administering them"*.
- 2.6 The electoral community once again managed to deliver what, at times, seemed an almost impossible challenge. The successful delivery of these elections was achieved through the personal sacrifices, commitment and dedication of electoral administrators. They worked tirelessly under an unprecedented workload, huge volumes of enquiries and the challenges presented by a winter poll, all at the same time as the annual registration canvass and in a very short timescale.
- 2.7 Unsurprisingly, the culmination of these pressures saw some Electoral Registration Officers (ERO) and Returning Officers (RO) unable to deliver their usual high levels of service to every elector. It is perhaps surprising that issues were not more widespread. It is testament to the dedication and commitment of the electoral community that the majority of electors received outstanding service.

## 3 Specific issues

### 3.1 Timetable, including a Scottish bank holiday

- 3.2 Parliament dissolved on Wednesday 6 November, with Writs issued on the same day and ROs receiving them a day later. For an unscheduled poll this extremely tight timetable presented numerous issues.

Electoral administrators usually spend up to six months preparing for a national election: in 2019, they delivered two from a standing start in just a few weeks.

- 3.3 An added complication was the Scottish St Andrew's Day bank holiday on 2 December falling within the election timetable. In accordance with legislation, the bank holiday applied to the general election timetable UK wide, but not for electoral registration purposes in England and Wales. This led to delays in confirming the timetable whilst the legislation was checked. This resulted in registration regulations being amended in Scotland to ensure consistency across the UK; and both the postal vote deadline and registration deadline falling on the same day, but at different times:
- **5pm on Tuesday 26 November** (11 working days before poll) – deadline for receiving new postal vote and postal proxy applications, and for changes to existing postal and proxy votes;
  - **Midnight on Tuesday 26 November** (usually 12 working days before poll but 11 working days before poll for the 12 December election) – deadline for receiving applications to register.
- 3.4 Further complications arose in areas where local government casual vacancy elections were being held, as the deadline for postal vote applications for those polls was Wednesday 27 November, as the bank holiday only applied when calculating the general election timetable.
- 3.5 Having the two registration deadlines, which cause the most work at elections, falling on the same day created significant issues for administrators. Urgent processing of registration applications in order to issue final poll cards, and processing of postal vote applications, had to be administered at the same time. It also led to electors who applied for a postal vote before the deadline, but who did not register to vote until after 5pm on 26 November, not being allowed to vote by post.
- 3.6 The Individual Electoral Registration (IER) digital service arranged additional downloads during the election period, including a supplementary download to take account of the postal vote deadline. This was helpful, especially as some printers required data files before midnight on deadline day.

**We believe that legislation should be amended so that all UK bank holidays, including those only observed in devolved nations, apply to all elements of the election and electoral registration processes. This should include timetables for**

**national polls and associated local government casual vacancy elections.**

### 3.7 Overseas postal votes

- 3.8 As we have previously reported, the expectations of many overseas electors were not met when postal ballot papers did not arrive in time for them to be completed, returned and included in the count, despite the best efforts of ROs.
- 3.9 Even for scheduled elections the timetable is tight as ballot papers cannot be printed before nominations close. The unscheduled election made the task significantly more challenging. The situation is exacerbated when overseas electors register to vote on, or close to, the registration deadline with many failing to follow the advice of their ERO to make suitable absent vote arrangements, preferably to appoint a proxy within the electoral area.
- 3.10 We have regularly highlighted this issue and in our September statement made the following recommendation: **5 - We strongly urge the UK Government to consider the way in which overseas electors can cast their votes.**
- 3.11 **Review of UK Parliamentary polling districts and polling places**
- 3.12 The compulsory review of UK Parliamentary polling districts and polling places<sup>1</sup> had to be started and completed between 1 October 2018 and 31 January 2020.
- 3.13 Local authorities had been working to ensure that the review was carried out, consultation processes completed, and Council approval obtained on the final scheme by the deadline.
- 3.14 Administering two unscheduled elections in 2019 had a significant impact on review timetables. Legislation prevents the deadline being extended, and the work must be coordinated around local authority meeting schedules. This introduced unnecessary risk as administrators balanced conflicting priorities.

**We believe that the UK Government should introduce changes to legislation so that, in the event of an unscheduled UK national poll or referendum, local authorities may extend their polling district and polling places review.**

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<sup>1</sup> Introduced by the Electoral Registration and Administration Act 2013

## 3.15 Cross-boundary constituencies

3.16 In many areas, the administration of a UK Parliamentary general election is complicated by constituency boundaries crossing local authority boundaries. In these areas a RO may take in or give away electors, or both, to form a Parliamentary constituency. This creates significant additional administrative challenges.

3.17 The current review of Parliamentary constituency boundaries was not universally implemented in time for the UK Parliamentary general election. However, if the recommendations of the four Parliamentary Boundary Commissions are agreed by the Government, the increase in cross-boundary constituencies will significantly increase the complexity and risk of future elections.

## 3.18 Revised Register of Electors

3.19 The timing of the general election caused significant challenges to the register of electors' annual canvass. When legislation was passed on 4 November, EROs had canvassers visiting properties where household enquiry forms (HEFs) and invitations to register (ITRs) had not been returned.

3.20 There is provision in legislation to defer publication of the electoral register from 1 December until no later than 1 February the following year if the poll for an election takes place during the annual canvass. However, there is no deferral provision for polls taking place in the days immediately after scheduled publication.

3.21 In most cases, EROs published their register at some point before 1 December, increasing the risk to the election and causing significant challenges and complexities for electoral administrators.

**We believe the UK Government should amend legislation to allow for the publication of the revised register of electors to be delayed if the Notice of Election for all polls is published during the annual canvass.**

3.22 Elector confusion arose from the two-stage process of IER. Firstly, each household must complete a HEF, followed by any new elector added to the HEF being required to complete an application (potentially in response to an ITR) in order to register. Some electors on polling day believed they were registered as they had completed a HEF, not realising they had failed to complete the second stage to register.

**Once canvass reform is implemented, we recommend that the UK Government, along with other stakeholders, undertake a review of the registration system, to clarify and improve the voter experience for those needing to complete two registration processes during the annual canvass period.**

- 3.23 Whilst we accept little can be done in relation to the following issues, we feel it is appropriate to highlight them to ensure the Government and other stakeholders are fully aware of challenges involved in the delivery of the electoral process.
- 3.24 Legislation requires that poll cards should be sent out as soon as practicable after the Notice of Election is published. The truncated timetable meant that printers required poll card data as soon as the election was announced. In many cases this meant that poll cards were printed with elector numbers that changed once the revised register was published and did not match the polling station registers.
- 3.25 Issues with software systems saw errors in polling station registers discovered less than a week before the poll, and the inability to publish the revised register whilst an election was underway.
- 3.26 **Franchise Issues**
- 3.27 Although the franchise for a UK Parliamentary general election does not allow EU nationals to vote, many expected to be able to, resulting in councils dealing with a significant increase in enquiries.
- 3.28 We believe voter confusion is an issue that must be addressed, especially considering franchise differences in Scotland and Wales which are likely to cause many to be unsure about their voting rights in different polls.

**We would urge the Government and the Electoral Commission to work together to consider how best to ensure electors understand which polls they are able to vote in.**

- 3.29 **Contingency costs**
- 3.30 With the election held in winter, arrangements for additional heating and lighting had to be made for some polling stations, as well as extreme weather contingency arrangements. The situation was made more difficult as the Cabinet Office was reluctant to agree funding for costs relating to weather-related contingencies.

## 4 Overarching issues

### 4.1 UK Government Departments

4.2 This election highlighted, yet again, the need for more joined up working across UK Government Departments and partners. We made the following recommendation in September 2019: **13 - We urge the UK Government to take a more joined-up approach to assist EROs and ROs to deliver democratic processes more efficiently and with greater collective ownership and understanding than at present.**

4.3 This lack of understanding was brought into sharp focus, and the job of ROs made more difficult, when the Secretary of State for Education wrote to all local authority Chief Executives on 5 November, advising: *'In the run up to Christmas, schools across the country will be planning festive events such as Christmas plays and carol concerts. These are important highlights in the school calendar and the result of a huge amount of hard work and dedication from staff, parents and children.*

*As you will be aware, central government has agreed to reimburse the necessary costs where needed to support you in identifying alternative venues to avoid disrupting long planned and important events relating to this time of year.*

*I would be grateful for anything you can do to ensure arrangements for polling stations keep the disruption to school activities over the Christmas period to an absolute minimum and that you work closely with local schools to this end. In every community there will be alternatives and I would ask that, wherever possible, these are used instead.'*

4.4 This letter was received over a week after Parliament had voted in favour of the election. The majority of ROs had already booked polling stations and sent poll card data to their printer. The letter caused some schools to attempt to cancel bookings or charge additional costs.

4.5 The assumption that every community has readily available alternative venues is incorrect. ROs already work hard to avoid requiring any school to close, and the identification of polling places is carried out in full consultation with the community, and independently of specific electoral events, through a statutory polling districts and polling places review.

- 4.6 The UK Government knew that there was the potential for long-standing school and community festive events across the UK to be affected by holding the election so close to Christmas. Issues in some areas with the delivery and receipt of communications via Royal Mail were exacerbated by the volume of Christmas mail, along with other challenges due to the time of year.
- 4.7 In our September 2019 statement we highlighted that, given the Cabinet Office's expectations that ROs should use schools to reduce the cost of elections, the Ministry for Housing, Communities and Local Government should regularly remind local government leaders of their responsibilities to support the delivery of the electoral process, not least by providing rooms for polling as well as sufficient and appropriate financial and staffing resources to EROs and ROs.
- 4.8 Difficulties securing the use of premises extended to some usual count centres not being available, with new venues having to be found at short notice, along with rooms not being available for postal vote opening and ballot box preparations.
- 4.9 Holding the election in December and just before Christmas had a severe impact on the availability of staff to work at polling stations and counts. At the start of election week ROs were reporting of vacancies not being filled. Some areas used all their reserve staff while others had no choice but to appoint staff as Presiding Officers who had no elections experience. Whilst there was little ROs could do, these situations added significant risk to the conduct of the election.
- 4.10 We would also signpost our concerns that changes proposed by Government to introduce voter ID, alongside a move towards less local flexibility for payment rates, may well increase difficulties in recruiting polling station staff.
- 4.11 For the second time in a year, core electoral services staff with holidays booked in the lead up to the election had to cancel them. While funding is available to cover cancellation costs, there is no funding to offset any increased costs of rebooking for an alternative date.
- 4.12 We are aware that many electoral services staff are questioning remaining in the profession because of the pressures they have recently faced, which will have the effect of introducing additional risk to the provision of quality services to citizens as knowledge and experience leaves.

## 4.13 Election fees and charges

- 4.14 The Parliamentary Elections (Returning Officers' Charges) Order, which set the Maximum Recoverable Amounts (MRA) for each parliamentary constituency was made on 4 November 2019.
- 4.15 In our September 2019 statement, we expressed concern that the current arrangement for fees and charges is not fit for purpose. We have significant concerns relating to this election, with many ROs expecting to exceed their MRA. We also expect some legitimately incurred costs not being reimbursed due to Government setting upper limits without any transparency, despite questions being asked, as to why and how those thresholds have been set.
- 4.16 We have already highlighted the costs of gritting and winter contingency arrangements not being funded by the Cabinet Office. An election in winter creates other additional costs including extra heating facilities and reduced hours of daylight requiring additional internal and external lighting at some polling places.
- 4.17 The short timescale also saw some print suppliers increase their costs significantly with many ROs concerned this will cause them to exceed their MRA.
- 4.18 Whilst we acknowledge and appreciate the extended deadline for the submission of the European Parliamentary election accounts, and the additional time to submit UK Parliamentary general election accounts, we remain deeply concerned over the capacity and the time it will take for outstanding and future election accounts to be settled.
- 4.19 There was no specific RO Fees and Charges guidance for this election. ROs were advised to use 2017 general election guidance in conjunction with supplementary guidance made available the week after the poll, only once costs had already been incurred or committed. Again, in our September 2019 statement we made the following recommendation: **10 - Maximum Recoverable Amounts, advances and guidance should be made available prior to the Notice of Election/Referendum being published before any national poll, whether scheduled or unscheduled.**
- 4.20 We also made the following recommendations, which we consider need urgent attention: **8 - Sufficient experienced staff resources should be provided to ensure that, except in exceptional circumstances, election claims are processed and signed off within six-months of being submitted to the Electoral Claims**

***Unit, which is the same deadline given to Returning Officers to complete them.***

***9 - A comprehensive review of the fees and charges structure is urgently needed to ensure sufficient funding is provided and to reduce the perceived bureaucracy when claims need to be settled.***

## 4.21 Registration applications and duplicates

4.22 This election saw a significant increase in the number of registration applications being made during the run up to the deadline, with 659,666 applications made on the final day.

4.23 Once again, EROs reported disproportionately high levels of duplicate online applications being made by electors who were already registered.

4.24 The issue of duplicates may have been made worse by the timing of the election coinciding with the annual canvass, when invitations to register were being issued. However, this is an ongoing problem and the amount of additional work caused by such unnecessary applications is unsustainable. We have highlighted this issue in previous reports and firmly believe that the UK Government must work with EROs to consider how a long-term workable solution can be found.

4.25 This election, like all national elections since the introduction of IER in 2014, saw significant numbers of people registering to vote late in the process. Despite additional temporary staff being employed, many EROs struggled to keep on top of processing, with reports that applications were still being processed several days after the registration deadline. This had an impact on electors who did not have their identity initially confirmed by the Department for Work and Pensions, as the required requests for evidence could not be sent out as quickly as normal. The continued assertion that all registration costs must be paid from local government budgets is outdated and unfair and we would urge the Government to conduct a review of registration funding.

4.26 In previous reports we have also made the following recommendation:  
***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;***

## 4.27 Electoral registration costs

4.28 We have raised the issue of registration funding in previous reports and there remains the issue of ERO funding in relation to national polls.

4.29 The increase in registration applications outlined at paragraph 4.22 were principally caused by a national poll taking place. Under current arrangements, the costs of processing those registration applications, and of issuing and processing absent vote applications, will have to be met by the ERO and their local authority not central government funding.

4.30 In our September 2019 statement, we made the following recommendation: **11 - We urge the UK Government to introduce a mechanism where the full costs of registration should be reimbursed to the relevant local authority or Valuation Joint Board where it can be demonstrated that those costs were incurred because of a national electoral event.**

## 4.31 Capacity of electoral administrators and suppliers

4.32 We have previously highlighted the reduced resourcing levels within local authorities which has impacted electoral services teams and their election support staff.

4.33 Our members have reported increased electorate expectations of instant responses to queries by email, telephone and social media, which have reached unprecedented volumes. Combined with the ongoing increase in last-minute registrations and the continued increase of postal votes to issue and open, administrators have felt more pressured than ever.

4.34 Whilst electoral administrators delivered the elections, mistakes were made in some areas and usual high standards of customer service were not always maintained due to the sheer volume of queries, registrations, absent vote applications and other challenges faced.

4.35 Suppliers also came under immense strain. Many had to increase capacity in a short period resulting in longer working hours and passing the resulting price increases on to their customers. There are a limited number of specialist printers in the market, with restricted capacity. The short election timetable meant that in some cases, the number of print runs a RO could order was restricted. This meant, for example, that they could not always issue postal votes as quickly as they would have liked. Whilst we accept printers generally provide an excellent

service to ROs, their requirements based on the short election timetable means ROs were limited in terms of the agile customer service they could provide to electors.

- 4.36 Likewise, there are a limited number of Electoral Management Software (EMS) suppliers. The uncertainty around whether there would be an election and the timing of the poll during the annual canvass caused issues for EMS suppliers. Software limitations and problems were identified during the election timetable, with one EMS requiring software updates just days before the poll and polling station registers having to be reprinted as a result.
- 4.37 In our September 2019 statement we made the following recommendation: **12 - We urge the UK Government to facilitate a wider understanding of the pressures being faced both by electoral administrators and the wider electoral community, ensuring that all stakeholders understand that those tasked with administering successful elections do not have limitless capacity.**

## 5 Conclusions

- 5.1 2019 was an unprecedented year of significant challenges and workload for electoral administrators with two unscheduled national polls, along with many running local elections in May, resulting in three polls in less than twelve months. Whilst it must be acknowledged that the polls were delivered successfully without major incident, this success should be attributed to the personal dedication and commitment of electoral administrators, suppliers and stakeholders.
- 5.2 In spite of this, 2019 has shown that the electoral system in the United Kingdom is not entirely fit for purpose and the already highlighted cracks are widening even more. It is unfortunate that inadvertent mistakes were made in some areas and the level of service not to the high standard ROs and EROs would have wished for but given the circumstances, timescales and infrastructure to deliver in such a short time was a credit to all concerned.
- 5.3 It should also be noted that the impact of the unscheduled polls in 2019, particularly the general election in December, is continuing to have a significant effect in 2020. Preparations for the Police and Crime Commissioner, Combined Authority Mayoral, London Mayor and Assembly and local government elections in May 2020, which would normally have commenced as the annual canvass was coming to its

conclusion, were disrupted and delayed, with the electoral community now facing a truncated timeframe in which to deliver those polls.

- 5.4 Electoral administrators can no longer continue to perform miracles. They cannot be expected to meet unreasonable expectations or continue to cover up the shortfalls caused by outdated legislation, some known and raised with Government for many years but not addressed – enough is enough.
- 5.5 The UK Government needs to conduct a full root and branch review of the UK electoral process. It needs to seriously consider our recommendations from this statement and our previous statements, along with those of other stakeholders.
- 5.6 Whilst we have said this in previous statements and reports we will say it again - urgent action is needed by the UK Government to ensure the continued delivery of safe and secure elections.
- 5.7 We therefore look forward to working with the UK Government and other key stakeholders on electoral reform and on the recommendations made in this and our previous post-election statements and reports.

**Rob Curtis**  
**Chairman**

**Peter Stanyon**  
**Chief Executive**

**5 February 2020**

**Founded in 1987, the Association of Electoral Administrators (AEA) is the professional body representing the interests of electoral administrators in the United Kingdom, working independently of government. Key objectives include fostering the advancement of consistent and efficient administration of electoral processes, raising the profile of electoral administrators and contributing positively to electoral reform.**

**The AEA has just under 2,000 members, the majority of whom are employed by local authorities to provide electoral registration and election services. It is uniquely placed to comment on the challenges faced by electoral administrators in delivering safe and secure electoral processes to UK citizens.**

# The Association of Electoral Administrators

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Since 2007, the Association has published seven reports<sup>2</sup> on the administration of elections and referendums, each focussing on the practical issues of administering electoral processes and making recommendations to the UK Government, the Electoral Commission and other key stakeholders. In 2018, in lieu of a report, the Association wrote to the Minister for the Constitution expressing disappointment with the slow progress being made to address those issues, many of which were also raised by the Law Commission<sup>3</sup>. Following the May 2019 polls, the Association published a high-level position statement and recommendations on 16 September 2019. Whilst our statement was acknowledged we still await a formal response.

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<sup>2</sup> <https://www.aea-elections.co.uk/policy-reporting/reports-issues-papers/>

<sup>3</sup> <https://www.aea-elections.co.uk/wp-content/uploads/2014/08/law-comm-electoral-law-interim-report-040216.pdf>

## APPENDIX A

### List of recommendations made in this paper

- 2019 - 14** We believe that legislation should be amended so that all UK bank holidays, including those only observed in devolved nations, apply to all elements of the election and electoral registration processes. This should include timetables for national polls and associated local government casual vacancy elections.
- 2019 - 15** We believe that the UK Government should introduce changes to legislation so that, in the event of an unscheduled UK national poll or referendum, local authorities may extend their polling district and polling places review.
- 2019 - 16** We believe the UK Government should amend legislation to allow for the publication of the revised register of electors to be delayed if the Notice of Election for all polls is published during the annual canvass.
- 2019 - 17** Once canvass reform is implemented, we recommend that the UK Government, along with other stakeholders, undertake a review of the registration system, to clarify and improve the voter experience for those needing to complete two registration processes during the annual canvass period.
- 2019 - 18** We would urge the Government and the Electoral Commission to work together to consider how best to ensure electors understand which polls they are able to vote in.

## APPENDIX B

### List of previous AEA reports and statements for background information

- ["The Electoral Landscape in 2019" – an AEA position statement – 16 September 2019](#)
- [Letter from the AEA to the Minister for the Constitution – 14th June 2018](#)
- [AEA post-elections report 2017: It's time for urgent and positive Government action](#)
- [AEA post-election and EU referendum report: Pushed to the absolute limit: 2016 – the electoral year never to forget](#)
- [Elections and Individual Electoral Registration – The challenge of 2015](#)
- [A question of timing? The administration of the Police and Crime Commissioner elections in England and Wales 2012](#)
- [The administration of the referendums and elections across the UK in 2011](#)
- [Beyond 2010: the future of electoral administration in the UK](#)
- [Official post election report May 2007 elections](#)

## APPENDIX C

<b>List of recommendations made in our September 2019 statement awaiting a formal response</b>	
<b>No.</b>	<b>Recommendation</b>
2019-1	We believe the UK Government should take appropriate steps to ensure candidates acting as their own election agent are still able to withhold their home address from all electoral communications.
2019-2	We believe the UK Government should take appropriate steps to rectify the administrative oversight introduced by the home address form and to make provision for the proper officer to be supplied with the candidate's home address or to permit the proper officer to inspect the home address forms.
2019-3	We ask the UK Government to fully consider concerns raised by the electoral community about the highly commendable decision to move the 2020 Early May Bank Holiday as a matter of urgency, and to work with stakeholders to mitigate risks.
2019-4	If the UK remains a member of the European Union in May 2022, the UK Government must act upon the Electoral Commission recommendations from 2014 to simplify the process for the registration of EU nationals ahead of potential participation in the 2024 European Parliamentary elections.
2019-5	We strongly urge the UK Government to consider the way in which overseas electors can cast their votes.
2019-6	The UK Government should consider and progress the Law Commission recommendations as a matter of urgency including addressing the issues raised in our response to the inquiry by the Public Administration and Constitutional Affairs Committee.
2019-7	We encourage the Cabinet Office to undertake a risk assessment of its own capabilities to support unscheduled electoral events and to develop contingency and succession plans to ensure that it can best support the wider electoral community in their delivery.
2019-8	Sufficient experienced staff resources should be provided to ensure that, except in exceptional circumstances, election claims are processed and signed off within six-months of being submitted to the Electoral Claims Unit, which is the same deadline given to Returning Officers to complete them.
2019-9	A comprehensive review of the fees and charges structure is urgently needed to ensure sufficient funding is provided and to reduce the perceived bureaucracy when claims need to be settled.
2019-10	Maximum Recoverable Amounts, advances and guidance should be made available prior to the Notice of Election/Referendum being published before any national poll, whether scheduled or unscheduled.

## List of recommendations made in our September 2019 statement awaiting a formal response

No.	Recommendation
2019-11	We urge the UK Government to introduce a mechanism where the full costs of registration should be reimbursed to the relevant local authority where it can be demonstrated that those costs were incurred because of a national electoral event.
2019-12	We urge the UK Government to facilitate a wider understanding of the pressures being faced both by electoral administrators and the wider electoral community, ensuring that all stakeholders understand that those tasked with administering successful elections do not have limitless capacity.
2019-13	We urge the UK Government to take a more joined-up approach to assist EROs and ROs to deliver democratic processes more efficiently and with greater collective ownership and understanding than at present.

## List of previous report recommendations

No.	Recommendation
2017-1	A single Electoral Administration Act should be brought forward, implementing the Law Commissions' recommendations to simplify electoral legislation.
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: <ul style="list-style-type: none"> <li>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</li> <li>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.</li> </ul>
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.

List of previous report recommendations	
No.	Recommendation
2017-7	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.
2017-8	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.
2017-9	An electronic system for the delivery, receipt and return of the Writ at UK parliamentary elections should be introduced.
2017-10	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.
2017-11	The roles and responsibilities of polling station tellers should be recognised in law.
2017-12	The involvement of campaigners in handling and/or assisting with the completion of postal ballot papers should be prohibited. <b>It is our understanding that this will be included in the proposed Electoral Integrity Bill.</b>
2017-13	<del>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.</del> <b>COMPLETED.</b>
2017-14	As part of its immediate work programme, Cabinet Office should include workstreams that will: <ul style="list-style-type: none"> <li>• Deliver an effective resolution to the ongoing issue of duplicate registrations;</li> <li>• Develop and extract management information from electoral management software systems that will be of assistance to EROs in the management of their electoral registers; <b>It is our understanding that this management information will be available following canvass reform.</b></li> <li>• Reduce bureaucracy in registration processes, both during and outside of canvass periods; <b>It is our understanding that this will, in part be achieved following canvass reform.</b></li> <li>• Enable the better sharing of data in order to simplify registration processes; <b>It is our understanding that this will in part be achieved following canvass reform.</b></li> <li>• Deliver an effective solution to the registration of individuals in establishments such as universities, colleges, residential care homes and houses in multiple occupation.</li> </ul> <p>The Cabinet Office should also set out a clear timetable of when each of these issues will be considered.</p>

## List of previous report recommendations

No.	Recommendation
2017-15	The provision of an email address should be made mandatory for all applications to register to vote made through the digital service.
2017-16	Attestation arrangements should be introduced for postal vote applications requiring a signature waiver.
2017-17	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.
2017-18	<p>A full and thorough review of absent voting arrangements should be undertaken that, as a minimum, considers:</p> <ul style="list-style-type: none"> <li>• The circumstances and criteria for emergency proxy applications;</li> <li>• The need for the attestation of fixed-period and indefinite proxy applications, given that this is not a requirement for postal vote applications; and</li> <li>• How the registration status of individuals appointed as proxies should be verified by Electoral Registration Officers.</li> </ul>
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.
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.
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.
2017-23	The option for candidates to restrict publication of their home addresses should be extended to all polls. <b>PARTIALLY COMPLETED.</b>
2017-24	The requirement for election agents' home addresses to be published should be removed.
2017-25	Nomination arrangements for all elections, specifically in respect of the requirement for subscribers and deposits, should be reviewed.
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.

## List of previous report recommendations

No.	Recommendation
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.
2017-29	A full and thorough review of all forms used in the electoral process should be undertaken.
2017-30	Legislation should be amended to clearly identify what constitutes a valid second registration.
2017-31	At any future national referendum, legislation should provide for the appointment of sub-agents.
2017-32	<p>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:</p> <ul style="list-style-type: none"> <li>• Updating the prescribed format of the Guidance for Voters notice for use at standalone UK Parliamentary elections;</li> <li>• Defining the electoral register as one document in law;</li> <li>• 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;</li> <li>• Recognising in law the role of Borough Returning Officer at elections of the London Mayor and Assembly;</li> <li>• Clarifying the inspection arrangements for election documentation following an election; and</li> <li>• Clarifying the arrangements around deferring publication of the electoral register where an election occurs during the defined canvass period.</li> </ul>
2017-33	<p>The processes for the registration of political parties should be fully reviewed in order to:</p> <ul style="list-style-type: none"> <li>• Provide certainty to Returning Officers as to deadlines applicable to new and amended party descriptions and emblems; and</li> <li>• 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.</li> </ul>