

The Association of Electoral Administrators



Statement from the Association of Electoral Administrators (AEA) on the Government response to the House of Lords Electoral Registration and Administration Act 2013 Committee report recommendations.

It was satisfying to see the breadth of work undertaken by electoral administrators, and the burden of costs borne by local authorities, so comprehensively reviewed in [the Committee's report](#). We would like to thank them for listening to, and hearing, so many colleagues from the electoral frontline.

Our points on [the Government response](#) are numbered to match corresponding sections in that response. Many points are referred to in our post-election report, [the most recent of which was published in February this year](#) which also includes a list of our outstanding recommendations from previous reports.

1. We are pleased to see the issue of payments for unscheduled polls addressed, and hope this will translate into swift reimbursement of costs incurred for the 2019 European Parliamentary and General elections. We continue to call for a full and thorough review of the funding of the delivery of electoral services, including payment of the full costs of voter registration incurred because of a national electoral event.
2. We support the Cabinet Office's Event-led Registration Volumes Project and will consider suggestions for interventions with interest. We note the Minister mentions the Government is prioritising other ways to modernise our country's electoral registration system. We have concerns about the lack of early communication on Voter ID and the wider proposals that were in the Conservative manifesto. We understand it is the Government's intention for proposals to be implemented ahead of the next UK Parliamentary general election, likely to be in 2024, however without work beginning immediately and active engagement with the wider electoral community, we have significant concerns about the proposed timescales.
4. Now the reformed annual canvass has been implemented, we would like to see a wider-scale review of the electoral registration system, particularly to clarify and improve the voter experience for those needing to complete a two-stage registration process during the annual canvass period. The shop front of registration is now much improved, but behind the counter still requires modernisation to remove ongoing confusion and meet citizens' needs and expectations.

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5. We do not feel that reverting to the current approach of using electoral registers from the most recent annual canvass of electors after the 2023 Boundary Review is the correct approach. We believe that, following the introduction of IER and the change in electorate approaches to event led registration, the electorate figures used for all future reviews should either be based on the electorate on the register for the May polls prior to the review, or that used at the last general election before the review. Both these registers would be more complete and accurate than a register published on 1 December.

6. Again, the costs of electoral registration should not become a burden on local authorities. Local authorities are unable to budget for unscheduled national electoral events and it is unfair to expect them to fund additional registration costs caused by those polls. Central government funding should be made available and we would urge any review of funding arrangements to be fast tracked.

8. We agree with the Committee that the Government should consider abolishing the open electoral register. If it is retained, electors should be asked whether they wish to opt in, rather than having to opt out. We believe the electoral register should not be sold for commercial purposes, but if the Government continues to allow it to be sold, fee rates should be reviewed and must reflect the cost of preparing the register and the value of the data. We would also urge the Government to restrict the resale of open register data by commercial parties.

10. The Committee's suggestion that electoral registration officer (EROs) be given greater guidance, funding and support to enable them to reach students while they are still in school is a good one. We are pleased to see the Minister encourage EROs to continue to use schools to reach young people but would argue additional funding and greater support from the education sector must be made available to make this viable.

13 and 14. The matter of fines for citizens who do not complete an Invitation to Register when requested to is a complex one. Money from civil penalties does not go to local authorities, who instead merely bear the cost of issuing the penalty. It is therefore seldom, if ever, used. We agree with the Committee that the current £80 fine is neither a deterrent nor worth the cost of enforcement.

16. We agree with the Committee that election timetables and registration deadlines should be reviewed, specifically those that apply to the registration of electors, overseas electors and absent voting. We also believe legislation should be amended so that all UK bank holidays, including those only observed in devolved nations, are considered.

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17. While the Minister's point that combined polls are clear for electors and can generate cost savings, we continue to call for full review of poll combinations. This should include 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.

18. We believe a single Electoral Administration Act should be brought forward, implementing the Law Commissions' recommendations to simplify electoral legislation. That the Government's "immediate priority will be the implementation of manifesto commitments" is disappointing. As we commented recently, these proposed measures are not the issue, bolting piecemeal legislation on to an already creaking system is. Thorough legislative reform could incorporate these new measures while ensuring the foundations of electoral law are firmly set in the 21st Century and not the 19th.

19. We are concerned about the mechanics for extending the overseas voter franchise. We believe overseas electors should, as part of their original application and subsequent renewal, be required to specify suitable absent voting arrangements or confirm they wish to vote at their allocated polling station in the UK.

20. With regard to the introduction of Voter ID and changes to postal and proxy vote processes, as stated in point two, without work beginning immediately we have significant concerns about the proposed timescales to introduce Voter ID and the wider proposals in the Government's election manifesto.

21. The Minister is correct that there are some cases where an individual may legitimately be registered to vote at two or more address, students and MPs being obvious examples. We continue to call for legislation to be amended to clearly define what constitutes a valid second registration.

22. On the matter of commitments to introduce changes to postal voting, again we would like to see a clear timetable setting out when such reforms will be considered and consulted on.

23. We welcome work being carried out on extending emergency proxy provision and hope this legislative opportunity will include circumstances and criteria for emergency proxy applications such as having to attend a funeral on polling day or change an appointed proxy due to illness, self-isolation or a similarly appropriate reason.

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25. We welcome the Minister's mention of identifying if and how any improvements in investigating electoral fraud and prosecution of offences can be achieved. We would flag our ongoing support for the introduction of a formal complaints system as outlined by the Law Commissions that provides for a clearer and local system of accountability and challenge.

28-33. Like the Committee, we do not think it will be sensible nor desirable to roll out Voter ID for the first time at a general election. To stress again, with the next UK Parliamentary election likely to be held in 2024, without work beginning immediately we have significant concerns about whether such a radical overhaul of in person voting could be achieved.

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October 2020