The Association of Electoral Administrators

Policy Positions

The Association of Electoral Administrators

Our position in relation to numerous policies is outlined in this document, broken down into three sections:

- Elections
- Electoral Registration
- Other issues

In addition, to supplement our high-level positions, we have produced the following policy position statements:

- Provision of polling districts and polling places
- The use of schools as polling places
- Electoral registration funding
- Sale of the register of electors
- UK Bank holidays and electoral administration

The Association of Electoral Administrators

Key messages and policy statements

Question	AEA policy position
1. Elections	
What are the biggest challenges facing returning officers?	- Staffing resources - Funding - Complexity of legislation - Complexity of different voting systems - Combined polls - Unscheduled polls - Tight election timetable - Cross boundaries - Electoral reform such as Voter ID - Overseas electors reform - Scotland and Wales – divergence in electoral legislation in the devolved nations. Rules for delivering elections and electoral registration are increasingly different from UK wide polls, presenting significant challenges in those areas moving forward. In our 2019 statement to the Minister we made the following recommendation: *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.* Other recommendations relating to these challenges are included throughout this paper.
What are the additional challenges facing returning officers for the 2021 polls?	- Level of combinations – some local authorities have four scheduled polls plus potential by-elections and neighbourhood planning referendums. - Covid-19 procedures and new ways of working to be Covid-19 compliant.

	• Challenges recruiting staff.
	• Staff and voter safeguarding requirements including PPE, social distancing, sanitiser and work bubbles.
	• Ensuring processes are safe for candidates and agents including nominations, observing polling stations, postal vote opening, verification and count.
	• Additional staff needed to manage Covid-19 processes and more reserve staff in case of late withdrawal.
	• Polling station availability and suitability.
Should voting be a legal obligation?	This is a matter for the UK Parliament and devolved administrations to determine.
	There are many advantages and disadvantages identified by organisations such as those referenced below. If the UK Government were to introduce compulsory voting, we would expect consideration to be given to issues raised in reports such as:
	▪ Electoral Commission – Compulsory Voting Around the World
	▪ House of Commons Briefing Paper – Compulsory Voting
	▪ IDEA – Compulsory Voting
	▪ Political Studies Association – Beyond Turnout: The Consequences of Compulsory Voting
Should voters be able to cast their vote online?	We believe using IT for voting should be considered, but only utilised when the system(s) can be shown to deliver safe and secure results, deliver improvements on current paper-based systems, be cost-effective and enhance public confidence and accessibility.
	There are many advantages and disadvantages identified by organisations such as those referenced below. If the UK Government were to introduce voting online, we would expect consideration to be given to the following types of reports, to experiences from other countries and from

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conducting further UK pilots to build on those carried out in 2007:

- Dr N Ben Fairweather & Professor Simon Rogerson Centre for Computing and Social Responsibility School of Computing De Montfort University, Leicester – Implementation of e-voting in the UK – technical issues

- House of Commons: Speaker's Commission on Digital Democracy: meeting on electronic voting

- IDEA – Introducing Electronic Voting – essential considerations

- Electoral Commission

  - Official report on the electoral pilot at Swindon elections

  - Official report on electronic voting and counting pilot at South Bucks elections

- Electoral Reform Society
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Should votes be counted electronically?
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We believe using IT to count votes should be considered, but only utilised when the system(s) can be shown to deliver safe and secure results, improvements on current paper-based systems, be cost-effective and has public confidence.

There are many advantages and disadvantages identified by organisations such as those referenced below. If the UK Government were to introduce electronic counting, we would expect them to consider the following types of reports as well as recent experiences of electronic counting in London and Scotland. The complexity of single transferable vote counting would benefit from electronic counting as it would make the count process easier and quicker.

- Electoral Commission

  - The May 2016 Mayor of London and London Assembly elections – Report on the administration of the Greater London Authority elections held on 5 May 2016
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	- [Electronic counting May 2007 electoral pilot schemes](#) - [Official report on electronic counting pilot at Stratford and Warwick elections](#) - [Official report on electronic counting pilot at Dover elections](#) - [Official report on electronic voting and counting pilot at South Bucks elections](#) ▪ [Counting the Vote Report of the London Assembly's Elections Review Committee – Elections Review Committee December 2007](#)
Should all-postal ballots be permitted?	We understand the positive and negative implications of all-postal ballots and are neither supportive of the principle or against it. We support the principles of full and proper evaluation to enhance public confidence and accessibility in electoral systems to ensure, in the event of this approach being taken, that all-postal ballots are deliverable and do not add unnecessary bureaucracy, cost and risk. There are many advantages and disadvantages identified by organisations such as those referenced below. If the UK Government were to introduce all-postal ballots, supplier capacity and feasibility considering the restrictions of the current election timetable would need to be considered. We would also expect them to consider the following types of reports, the experiences of the 2017 pilots in Tower Hamlets and Slough pilots and consider conducting further pilots: ▪ [House of Commons Library Briefing Paper – Postal Voting](#) ▪ [House of Commons Library – All Postal Voting](#) ▪ [House of Commons ODPM: Housing, Planning, Local Government and the Regions Committee – Postal Voting](#) ▪ [Cabinet Office – Electoral Integrity Project - Local Elections 2018 – Evaluation](#)

	- [Democratic Audit UK – Postal Voting and Electoral Fraud](#)
	
	- Electoral Commission
	
	  - [May 2018 voter identification pilot schemes](#)
	
	  - [Report on all-postal voting pilot scheme: Hesket ward, Eden, Cumbria](#)
	
	  - [Report on all-postal voting pilot scheme: Porthleven ward, Kerrier, Cornwall](#)

Should convicted prisoners be entitled to vote?	It is a matter for the UK Parliament and devolved administrations to determine if the franchise should be extended to include prisoners. AEA members will administer the process according to the legislation in force. The current position across the UK is: In England, no convicted prisoners can vote. In Northern Ireland, convicted prisoners can vote. In Scotland, [the Scottish Elections (Franchise and Representation) Bill](#) became law on 1 April 2020 and introduced the right to vote to some prisoners in local and Scottish Parliamentary elections. In Wales, the Welsh Government removed extending the franchise to prisoners for local government elections and it will be removed from the bill during the next stage. The Local Government and Elections (Wales) Bill is making its way through the Senedd Cymru. The Scottish Parliament decision to allow prisoners to vote compounds our ongoing concerns about inconsistencies across the UK. We would urge all governments within the UK to consider the risk and confusion caused by the different electoral registration and election processes. We believe it is in the interest of the voter for the same policy to apply to all polls wherever possible. Where this is not possible, full consideration should be given to the potential impact of any decision.

	Any changes must consider the need for the administration of votes to be safe, secure and secret.
Should the voting age be reduced?	It is a matter for the UK Parliament and devolved administrations to determine any change to the existing franchise. AEA members will administer the process according to the legislation in force.
	The current position across the UK is:
	In England, the voting age for all polls is 18.
	In Scotland, the voting age is 16 for all polls excluding UK Parliamentary general elections when it is 18.
	In Wales, the voting age for Senedd elections is 16. For local government elections it is currently 18 although this will be lowered to 16 once the Local Government and Elections Bill is passed into law. For UK Parliamentary general elections and Police and Crime Commission elections the voting age is 18.
	In Northern Ireland, the voting age for all polls is 18.
	Devolution in Scotland and recent changes made in Wales to reduce the voting age will clearly have an impact. We have concerns about inconsistencies across the UK. We would urge all governments within the UK to consider the risk and confusion caused by the different electoral registration and election processes. We believe it is in the interest of the voter for the same policy to apply to all polls wherever possible. Where this is not possible full consideration should be given to the potential impact of any decision.
	There are many advantages and disadvantages identified by organisations such as those referenced below. If the UK Government were to reduce the voting age, we would expect them to consider the types of issues referenced in the following: ▪ [Electoral Commission – Scottish Elections (Reduction of Voting Age) Bill](#)

	- Scottish Government – Scottish Elections (Reduction of Voting Age) Bill - Young Citizens – Lowering the voting age to 16 - Political Studies Association – Beyond the Youth Citizenship Commission: Young People and Politics
What is the AEA's position on electors being able to vote more than once at local government elections?	It is a matter for the UK Parliament and devolved administrations to determine franchises and voting entitlement. However, we support the principles of full and proper evaluation to enhance public confidence and accessibility in electoral systems. Any change should be deliverable and not add unnecessary bureaucracy, cost or risk. The UK voting system is largely based on trust. With individuals able to register more than once where they can demonstrate residence, there is a risk of electors voting more than once when not entitled to. In our 2017 post-election report, we recommended legislation be amended to clearly identify what constitutes a valid second registration. We also believe the administrative burden of any changes to ensure electors cannot vote more than once would need extensive consideration.
Does the AEA think elections are secure from fraud?	The UK voting system is largely based on trust so is potentially vulnerable to electoral fraud. It is generally recognised that there is no evidence of widespread issues, and that any form of electoral fraud is unacceptable. We and our members are aware of potential weaknesses in current systems that could make fraud possible. We broadly welcomed the findings of the Rt Hon Lord Eric Pickles Electoral Fraud Review in 2015 and the recommendations in his report "Securing the ballot: review into electoral fraud", and welcome steps being taken to further secure the ballot. We will continue to work closely with key stakeholders in implementing the report's

	recommendations and addressing issues of perceived systemic weaknesses.
Should electors be required to show ID in polling stations?	We understand the positive and negative implications of Voter ID at polling stations and are neither supportive of the principle or against it.
	We welcomed Voter ID pilots, which enabled full and proper evaluation of proposed systems.
	We remain concerned that further consideration is needed to make sure any change is deliverable, does not add unnecessarily to bureaucracy, costs and risk, lead to the disenfranchisement of certain groups, and does not negatively impact those who wish to vote.
	If the UK Government introduces Voter ID there must be sufficient lead-in time for legislation, administrative planning, delivery and voter education. This will be essential for a smooth transition.
	We would also advise caution about the timing of any change, to ensure any new system is robust enough to withstand the demands of a high turnout poll.
	We have concerns at the lack of progress considering changes are planned to be introduced by the next UK Parliamentary General election, likely to be held in May 2024.
Should there be an electoral ID card which could be used as ID to vote?	The UK Government is proposing that photographic ID will be necessary to vote. A national electoral ID card would offer obvious benefits to electors who may find it difficult to produce one of the required forms of identification.
	We appreciate the cost of such an implementation and local authorities could provide an alternative option such as a locally produced ID. However, producing a local ID card would have a significant impact on returning officer and electoral registration officer resources. Requests from electors would be made at their busiest time while administering an election with already stretched resources.

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	For a smooth transition, any national or local ID card scheme would require sufficient lead-in time for legislation, administrative planning and delivery. Any scheme must also be fully funded.
	We have concerns at the lack of progress considering changes are planned to be introduced by the next UK Parliamentary General election, likely to be held in May 2024.
Should all citizens, regardless of nationality, be entitled to vote in the UK?	It is a matter for the UK Parliament and devolved administrations to determine the franchise. AEA members will administer the process according to the legislation in force.
	However, exiting the EU, devolution and proposed changes in devolved nations around residency-based registration will clearly be a factor. We have concerns about inconsistency across the UK and voter confusion at combined polls.
	The Senedd and Election (Wales) Act and the Scottish Elections (Franchise and Representation) Act have extended voting rights to all qualifying foreign citizens for Senedd, Scottish parliament and Scottish local government elections. Wales is also due to extend voting rights for local elections with the Local Government and Elections (Wales) Bill.
	We would urge all governments within the UK to consider the risk and confusion caused by introducing different processes for elections and electoral registration. We believe it is in the interest of the voter for the same policy to apply to all polls. Where this is not possible, full consideration should be given to the potential impact of any decision.
	In our 2019 post-election report we urged the UK Government and Electoral Commission to work together to consider how best to ensure electors understand which polls they are able to vote in.
Should voting at places other than traditional polling stations be permitted?	We believe polling places should be accessible, suitable for all eligible electors and allow them to cast their votes in secret. It must be noted that while legislation provides for publicly funded premises, including local authority schools, to be made available free of charge to returning officers,

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	custodians are often reluctant to do so for a variety of legitimate reasons. We have produced a policy position paper on the [use of schools as polling places](). This makes it clear that we believe more should be done to support returning officers' use of publicly funded buildings. The key priority is to ensure electors can vote in a convenient way. Non-traditional venues like as supermarkets and high street shops may encourage participation and provide accessible buildings. However, they can also bring confusion for voters who are not eligible to vote at that venue.
What support should be provided to voters who need additional assistance?	The key priority is to ensure all eligible electors have equal access and can vote in an easy, accessible, and convenient way. All polling stations are required to have disabled access, enlarged ballot papers, pictorial guidance and a tactile voting device. Legislation allows a companion or Presiding Officer to assist a voter in casting their vote. In addition, presiding officers are encouraged to position ballot boxes on a low level surface, provide an additional chair for seating, thick pencils, and allow use of a mobile phone app on request to assist with reading the ballot paper.
Should voting take place at weekends?	It is a matter for the UK Parliament and devolved administrations to determine when polling should take place. AEA members will administer the process in line with the legislation in force. If voting was moved to weekends, we are concerned about additional costs, the impact on the availability of staff and the availability of venues for both polling and the count.
Should voters who have specific needs be able to vote at any polling station in the constituency/local government area?	We believe all electors should be able to cast their votes as easily as possible, securely and independently. However, we also recognise the challenges electoral administrators face in meeting the needs of all electors. We will continue to work with key stakeholders to address these issues.

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	Should the UK Government introduce changes to allow facilities for voters with specific needs to vote at any polling station in the constituency/local government area, there would be significant legal and administrative challenges to ensure the ballot is safe, secure and not open to fraud.
	We support the work the UK Government is doing to enable all electors to vote regardless of additional challenges some may face. However, we fundamentally believe all polling stations should be accessible to all, but accept there are obstacles in some areas. We believe an increased dialogue between returning officers and those representing disability groups would help ensure voters needs can be better met.
Are current electoral processes deeply rooted in the nineteenth century out of date for twenty-first century voters?	Yes.
	Electoral administrators are increasingly aware of the public's frustrations with what is often viewed as an outdated and bureaucratic system.
	The introduction of Individual Electoral Registration in 2014 allowed potential electors to apply to register to vote online. This has been a great success, but many other processes remain paper based.
	We have welcomed the UK Government's commitment to review elements of the electoral process but believe the time has come to take a comprehensive review of all registration and election processes. We believe part of this review should focus on modernising the electoral process to meet the expectations of twenty-first century voters.
	This review should consider requirements for the submission of nomination papers, electors' voting options and the two-stage annual canvass process.
Do the AEA believe pens should be used in polling booths for voters to cast their vote rather than pencils?	The use of a pen or pencil to complete a ballot paper is not specified in legislation. In the UK, pencils are traditionally used to mark ballot papers and are made available in polling stations for voters to use.

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	Pencils are used for both historic and practical reasons. Ink pens may dry out or spill; ink may cause some transfer of the mark the voter has made when they fold the ballot paper, potentially leading to their vote being rejected if, for example, it looks like they have voted for more candidates than they are entitled to.
	There is nothing to stop a voter from using a pen to mark their vote. There is no legal requirement for ballot papers to be marked with a pencil.
	We believe using pencils in polling booths best mitigates the risk of accidental invalidation of a ballot paper. There are numerous procedures in place to reassure voters their ballot paper could not be tampered with after they have cast their vote.
Does the complexity of the current system support the effective delivery of electoral services to voters?	No.
	There are currently over 75 separate pieces of legislation relevant to elections. This makes the administration of electoral processes inefficient and introduces significant risk.
	We believe the point where consolidating legislation to solve problems inherent in the electoral process has passed. We need 'root and branch' reform and rewritten legislation.
	We welcomed the Law Commission's work towards simplifying electoral legislation across the UK in a single Electoral Administration Act.
	We consider effecting the Law Commission's recommendations a priority policy matter.
	We are disappointed to learn from the UK Government that there is unlikely to be a single Electoral Administration Act soon. Work had started, with the Law Commission drafting legislation on behalf of the Cabinet Office, but progress has been slower than anticipated. The Law Commission and Cabinet Office are continuing to look at ways to implement legislative change.
	We have recommended on a number of occasions, most recently in our 2019 statement, that:

	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.
	We will continue to press for changes in secondary legislation to address current areas of concern.
What is the AEA's view on funding for elections/electoral registration?	The funding mechanisms for electoral services are unclear.
	For elections, there is central funding in the form of 'fees and charges' for UK-wide elections and referendums. Local elections are paid for by local authorities.
	Registration costs are paid for by local authorities. In addition, there is currently central funding for any additional registration costs incurred as a result of introducing Individual Electoral Registration (IER). From 2020 this funding has been adjusted to account for savings brought through canvass reform.
	We have significant concerns about funding and have called on numerous occasions, most recently in our 2019 statement, for:
	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.
	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.
	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.
	In our 2017 report and 2018 Ministerial letter, we highlighted that a full and thorough review of

electoral services funding should be undertaken as a matter of urgency, to ensure 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.*

In addition, we have published a policy position paper on electoral registration funding.

Future registration funding is currently unclear and there are numerous issues around funding of national elections and referendums. We will continue to work with the UK Government on these issues and hope future funding arrangements will benefit from these discussions.

Who decides on the location of polling stations and what changes to the process would the AEA like to see?	Legislation currently requires local authorities to review UK Parliamentary polling districts and polling places every five years. However, Returning Officers are responsible for the provision of polling stations and their staffing and equipment under relevant election rules.
	We believe the selection of polling places should be the responsibility of Returning Officers, who act independently, rather than local authorities. This would put the interest of voters at the centre of the issue and give Returning Officers more flexibility to insist on providing accessible polling stations.
	In our 2017 post-election report we highlighted that electoral registration officers should be given responsibility for the subdivision of UK parliamentary constituencies into polling districts, and returning officers for the designation of polling places within those districts.
	In our 2019 post-election statement we recommended 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. We have published a policy position paper on the [provision of polling districts and polling places](#).
What date should be used for the eligible electorate data when conducting a UK parliamentary boundary review?	Under current legislation, the next boundary review will be based on the electoral register on 1 December 2020, following the annual canvass. Legislation on the conduct of boundary reviews was introduced in Parliament in May 2020. In light of the potential disruption posed by the coronavirus pandemic to registration activity and the annual canvass, the UK Government has brought forward a Bill amendment. This amendment makes provision for the next boundary review to be based, on a one-off basis, on the number of registered electors on 2 March 2020. This represents the most up-to-date electoral registration data available from the point before the impact of coronavirus became widespread. This is a one-off arrangement and 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 be based on the register for the May polls prior to the review. This is when the register is at its most complete and accurate.
2. Electoral Registration	
What are the biggest challenges facing electoral registration officers?	• Staffing resources • Funding • Complexity of legislation • Two stage process for annual canvass • Ensuring complete and accurate register of electors • Registration of hard to reach groups • Tight election timetable – registration and absent vote applications • Cross boundaries – postal vote data

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	• Electoral reform – such as registration of overseas electors 'votes for life' • Scotland and Wales - divergence in electoral legislation in the devolved nations with rules for delivering elections and electoral registration increasingly different from UK wide polls. This will present significant challenges in Scotland and Wales moving forward. In our 2019 statement to the Minister we made the following recommendations: *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.* We also recommended that once canvass reform is implemented, the UK Government and key stakeholders undertake a registration system review to clarify and improve the voter experience for those needing to complete two registration processes during the annual canvass period. Other recommendations relating to these challenges are included throughout this paper.
What are the additional challenges facing electoral registration officers in 2021?	• Issues with completeness and accuracy of register following issues with the annual canvass like limitations in door knocking due to second wave of the pandemic. • Increased volume of absent vote applications due to Covid-19, including late applications. • Limited opportunity in Wales and Scotland to engage with newly enfranchised electors. • Continuation of the pandemic into 2021, with implications for registration and absent vote arrangements.
Should registering to vote be a legal obligation?	While this is a matter for the UK Parliament and devolved administrations to determine, to help our members deliver a safe and secure electoral system, we believe registering to vote should be a

legal obligation, with simpler forms of enforcement available to electoral registration officers (EROs).

Current legislation requires voters to provide accurate information, which effectively means that if qualified and resident, individuals are required to register to vote when sent an invitation by an ERO.

Legislation also makes provision for civil penalties in the case of failing to complete an invitation to register and prosecution through the courts for failure to respond to a Household Enquiry Form. However, very few EROs take enforcement action due to the complex and costly legislative process which must be funded by the local authority. The maximum fine for not responding to an invitation to register is £80 and, if prosecution were successful, the fine must then be passed on to central government.

The House of Lords Select Committee report 'An electoral system fit for today? More to be done' made the following statement:

'We would expect that modernisation of the registration system as recommended in Chapter 2 would go some way to obviating the need to pursue measures such as fines. However, we note that fines can be a useful tool for EROs who have a legal duty to compile complete and accurate registers. The Government should look again at the fines regime and consider new regulations to increase the fine for failure to respond to an ITR. At £80 it appears to be insufficient as a deterrent and not worth the cost of enforcement.'

Should students/people with second homes be allowed to continue to register at two addresses?	The UK voting system is largely based on trust. With individuals able to register in more than one place where they can demonstrate residence, there is a risk of electors voting more than once when they are not entitled to. If the system were to change, one option would be for electors eligible to register at more than one address to indicate which address they wish to use their vote at as part of their initial application. This

	would be kept on record and votes issued accordingly at appropriate elections.
	We would also highlight the huge resource required to invite students to register with no clear option for them to indicate that they do not wish to register at their term-time address. We believe it should be clearer to students, and to other voters with two eligible addresses, that they have a choice about whether to register at a second address.
	It is a matter for the UK Government and devolved administrations to determine how the electoral system should be administered. However, we have previously recommended that legislation should clearly identify what constitutes a valid second registration. We would also urge the UK Government to define residency as this can cause confusion for both electoral registration officers and citizens.
Should the 15-year rule for overseas electors be removed?	It is a matter for the UK Government to determine the franchise for UK Parliamentary elections. AEA members will administer the process in line with legislation.
	Should the UK Government introduce this change the application process would need to be altered. Current proposed requirements would be unworkable due to the limitations of records held by electoral registration officers.
	The administration of overseas elector applications and renewals must be carefully considered when drafting any new legislation. Sufficient lead-in time must be allowed for the introduction of any changes.
	We would also urge more thought be given to educating overseas electors about different ways to cast their ballot. A reliance on postal votes can lead to overseas electors being disenfranchised as a result of receiving ballot papers too late to return them. In our 2019 statement to the Minister we made the following recommendation:

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	We strongly urge the UK Government to consider the way in which overseas electors can cast their votes.
Should there be automatic registration via national data sources as people move address i.e. public utilities data?	Automatic registration, whereby eligible citizens who interact with government agencies are registered to vote without making an application, is a matter for UK Parliament and the devolved administrations to determine.
	As a general point, we believe electoral registration officers should have full access to any official records that will help them maintain a complete and accurate electoral register. Full and proper evaluation would be required to ensure public confidence. Any proposed changes would need to be deliverable and avoid any unnecessary bureaucracy, cost and risk.
	We believe automatic registration could deliver cost savings to local authorities, avoid peaks in registration before electoral events and help those in hard to reach groups to register.
	A 2016 UK Parliament debate on the topic outlined the advantages and disadvantages, also identified by organisations such as those referenced below. If the UK Government and/or the devolved administrations were to introduce automatic registration, we would expect them to consider the following types of reports: - House of Lords Select Committee report; 'An electoral system fit for today? More to be done', July 2020 - Is it time for Automatic Voter Registration in the UK, Toby S James and Paul Bernal, April 2020 - Getting the 'missing millions' on to the electoral register: A vision for voter registration reform in the UK, Bite the Ballot and Dr Toby James, Clear View Research, April 2016 - It's time to talk about automatic voter registration, Electoral Reform Society, Josiah Mortimer, June 2016

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Should there be a single electronic register for the UK?	It is a matter for the UK Parliament and devolved administration to determine whether a national electoral register would be appropriate but if it were, there would be obvious and clear benefits to electoral processes.
	A [House of Commons library summary](#) states: *"A centralised registration system, including software and administration, is likely to be difficult and costly to develop. Central registration was attempted some years ago, the CORE system, but this was abandoned. The Labour Government had attempted to create a locally compiled but centrally held electoral registration database in 2005, but the project was abandoned by the Coalition Government in 2011. The provisions relating to CORE in the Electoral Administration Act 2006 and Political Parties and Elections Act 2009 were repealed by the Electoral Registration and Administration Act 2013.*
	There have been concerns about personal data being collected centrally; the ONS conducted some research into public attitudes towards providing population statistics and the use of administrative data in 2014. It found that people generally did not object to data being held by other government departments being shared but there were objections about privacy and security."
	We would expect there to be a comprehensive study of the mechanics of creating a single register for the UK before any decision were made.
Should the full electoral register be available for sale to Credit Agencies and other statutory bodies?	We believe current regulations governing access and supply of the electoral register are flawed and should be reviewed, including being clear about exactly what the electoral register is for.
	We are not opposed to licensed organisations accessing data for credit and security checks, but we do not agree with those organisations then being permitted to use that information, compiled at public cost, for commercial purposes. We firmly maintain that the edited register should be

	abolished, and no elector details should be available for sale to undefined third parties.
	We have produced a policy position paper on the sale of the register of electors.
Should there be two versions of the register – full and edited (also known as open)?	No. We believe the electoral register should be compiled for electoral and other limited purposes only like credit and security checks. We do not support the sale of personal data. Access to the electoral register should be strictly prescribed and controlled, and the edited register dispensed with.
	We have produced a policy position paper on the sale of the register of electors.
Should the publication of the revised register of electors be delayed in the event of an election being held?	Conducting an annual canvass and an election at the same time creates conflicting challenges for electoral administrators. While this has been an issue over the years with by-elections, the situation was significantly more challenging when the 2019 UK Parliamentary General Election was called during the annual canvass.
	In our 2019 post-election statement we recommended 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. Other issues

What is the AEA's view on the timing of the count at UK Parliamentary general elections?	Where combined with another poll, the requirement to commence the counting of votes at a UK Parliamentary election within four hours of the close of poll should be removed.
Does the AEA support the changes made in the 2020 Parliamentary Constituencies Bill?	This is a matter for the UK Parliament to determine. We support the changes in the Bill which provides for Parliamentary seats to remain at 650 with the boundary review, due to begin in early 2021, reporting before 1 July 2023.
	We have concerns about the administrative complexities cross boundary proposals made in future recommendations could bring. We are also

	concerned that administrators may not have sufficient time to make arrangements for administering elections on new boundaries if an early UK Parliamentary general election was held.
Should returning officer/electoral registration officers be permitted to trial reforms in different ways to better meet the needs of different communities?	This is a matter for the UK Parliament and devolved administrations to determine. Full and proper evaluation would be required to ensure public confidence in any proposed changes. Changes would also need to be deliverable and avoid any unnecessary bureaucracy, cost and risk. While understanding the benefits of a tailored approach, we believe different practices across the UK bring increased risk and that these risks should be fully considered before trials of any practices not anticipated to be rolled out nationally are agreed. We have concerns that any further inconsistency of approach between different elections, across the UK and neighbouring local authority areas, could lead to voter confusion and increased apathy. As detailed in our response to the *Welsh Government White Paper Reforming Local Government Resilient and Renewed (April 2017)* we have reservations about individual returning officers and electoral registration officers adopting whichever approach they believe is best for their community/location.
Should ROs be able to choose their voting system?	We have concerns that any further inconsistency of approach between different elections, across the UK and neighbouring local authority areas, could lead to voter confusion and increased apathy. As detailed in our response to the *Welsh Government White Paper Reforming Local Government Resilient and Renewed (April 2017)* we have reservations about individual returning officers and electoral registration officers adopting whichever approach they believe is best for their community/location. While understanding the benefits of a tailored approach, we believe different practices across the UK bring increased risk and that these risks should be fully considered before trials of any practices not anticipated to be rolled out nationally are agreed.

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Should returning officers be entitled to personal fees?	We believe returning officers, who are independent of their employing local authorities, should be entitled to receive a personal fee at a rate that appropriately reflects the complexity and position of the role, the associated serious personal liabilities and additional workload.
Is the current cycle of elections correct?	This is a matter for the UK Parliament and devolved administrations to determine but we can see some benefits to the cycle of all elections being reviewed. Electoral cycles vary depending on election type across four or five year terms. This creates significant combinations of polls in certain years. If all electoral cycles were changed to five years, this would in theory reduce the number of combined polls, unless an unscheduled UK Parliamentary general election was held.
What should the timescales be for introducing new legislation?	Unless there are exceptional and unavoidable circumstances, we believe legislation should be in place six months prior to any election or referendum, and electoral registration canvass. For elections and referendums, the six months should run prior to the publication of the notice of election/referendum.
Does the AEA support the Law Commission recommendations to bring forward a single Electoral Administration Act?	We consider effecting the Law Commission's recommendations a priority policy matter. A single Electoral Administration Act should be brought forward to simplify electoral legislation.
Should all UK bank holidays, including those only observed in devolved nations, apply to all elements of the election and electoral registration processes?	Yes, as this would avoid confusion and create a consistency of approach across the UK. With current legislation there can be different registration and election timetables. While this may not have significant implications for a Council ward by-election, it caused significant implications and confusion at the 2019 UK Parliamentary General Election due to a Scottish bank holiday in the election timetable.

	In our 2019 post-election statement we made the following statement: *'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.'*

Summary of key electoral events and milestones: 2020 - 2025

Date	Event	Key issues / comments	Extent
From 1 October 2020	Local Government by-elections - rescheduled under Coronavirus Act 2020, section 70, following consultation with Scottish Ministers and Convener of EMB. Proceeding following detailed Risk Assessment.		Scotland
1 December 2020 or 1 February 2021	Publication of the revised register of electors • The Representation of the People (Electoral Registers Publication Date) Regulations 2020 - England • The Representation of the People (Electoral Register Publication Date) (Wales) (Coronavirus) Regulations 2020 – Wales • The Representation of the People (Electoral Registers Publication Date) (Coronavirus) (Scotland) Regulations 2020 - Scotland		GB
31 December 2020	End of Brexit transition period		UK
Early 2021	Commencement of the next Parliamentary Boundary Review (Parliamentary Constituencies Bill) – seats to remain at 650		UK

1 February – 16 April 2021	Rescheduled principal area and community council by-elections – postponed from 16 March 2020 – 31 January 2021		Wales
May 2021	Scottish Parliamentary elections – 5-year cycle (Scottish Elections (Dates) Act 2016)	First to include qualifying foreign citizens and prisoners	Scotland
	Senedd Cymru/Welsh Parliament Elections – 5-year cycle (Wales Act 2014)	First to include 16-year olds and qualifying foreign citizens	Wales
	Local government elections including County Council, some Mayoral and Combined Authority Mayoral elections		England
	Plus, the postponed elections from May 2020: • Police and Crime Commission elections • Local government elections including parish, some Mayoral and Combined Authority Mayoral elections • London Assembly elections • Mayor of London elections		E&W England London London
May 2022	Local government elections including parish and some Mayoral and Combined Authority Mayoral elections		England

	Local government elections	5-year term from 2017 to avoid combination with Scottish Parliament	Scotland
	Local government elections, including community councils	5-year term from 2017 to avoid combination with Senedd Cymru/Welsh Parliament First to be run on new boundaries/election arrangements in all 22 local authorities if boundary review completed in time - due to complete by March 2021.	Wales
	Northern Ireland Assembly elections – 5-year cycle (Northern Ireland Miscellaneous Provisions Act 2014)		Northern Ireland
May 2023	Local government elections, including parish and some Mayoral elections		England
	Local government elections		Northern Ireland
1 July 2023	Date at which the next UK Parliamentary polling districts and polling places review must be completed		UK

	by (review based on the number of registered electors as at 2 March 2020)		
May 2024	UK Parliamentary general election (possibly based on new parliamentary boundaries subject to Parliamentary approval) – this will change if the Fixed Term Parliament Act is repealed.	Possible introduction of Voter ID subject to legislation. Concerns of significant voter confusion if both Voter ID and new Parliamentary boundaries including new constituency/polling places for voters introduced at the same election for the first time.	UK
	Police and Crime Commission elections		E&W
	Local government elections including parish and some Mayoral and Combined Authority Mayoral elections		England
	London Assembly elections		London
	Mayor of London elections		London
May 2025	Local government elections including County Council, some Mayoral and Combined Authority Mayoral elections		England