



Chloe Smith MP,
Minister of State for the Cabinet Office

9 September 2021

Open letter from the Association of Electoral Administrators and the Society of Local Authority Chief Executives

Dear Minister,

We are writing to convey the deep concern expressed across the electoral and local government community about the [Joint Committee on the Fixed Term Parliaments Act's proposal](#) to reduce the general election timetable back to 17 working days.

We have shared our concerns with partners across the sector and can attest to the unanimous alarm this proposal has caused. We understand others are also intending to write to you along similar lines to help inform the debate.

Repealing the Fixed Term Parliaments Act is clearly a matter for the UK Parliament to determine, but we cannot stress strongly enough that the proposal to reduce the timetable from 25-days is simply not achievable within our current electoral system.

Should this proposal be enacted, we are certain it would lead to voter disenfranchisement at best, and catastrophic failure of polls at worst, leading to a loss of public confidence in our electoral and democratic process.

Recent comments in the House of Commons from MPs suggesting that: "Perhaps, once every four of five years, our hard-working council officials could do some overtime at weekends if necessary" and that: "a 25-day period is for the benefit for the administrators rather than the electorate" show a worrying ignorance of the complexity of our electoral process, and the extended hours of hard and expert work that go into running polls throughout the year – scheduled or otherwise.

[In evidence](#), the Joint Committee was informed by the Association of Electoral Administrators (AEA) that even the current 25-day timetable is only just achievable, particularly in the case of unscheduled general elections as in 2017 and 2019. The AEA has even gone further, [arguing](#)

[the case for an extended 30-day timetable](#) to increase capacity, introduce resilience and ensure electors are put first.

While the Fixed Term Parliaments Act has not met its aim, we must stress that electoral legislation and practice has hugely changed even since its introduction in 2011. Reinstating the timetable to a length which was acknowledged as too short even then is simply not a viable option.

Divergence in electoral legislation and practice across the UK mean that while all nations would be affected by a shorter timetable, and are preparing for upcoming legislative change, Northern Ireland would be affected differently to England, Scotland and Wales. The Chief Electoral Officer of Northern Ireland has indicated that she will provide additional communication in due course.

A minimum statutory timetable with no lead-in time does not put electors first. A shorter timetable would leave them little time to register to vote or to cast postal votes, especially those living overseas. With votes for all overseas UK electors, however long they have lived abroad, promised ahead of the next general election via the Elections Bill, the numbers concerned are set to rise significantly.

With the next general election due to be held by the end of 2024, there is already little administrative time to implement the wide-ranging measures proposed in the Elections Bill let alone increasing pressure by reducing the timetable. They include the franchise expansion of overseas electors, the introduction of Voter ID, restrictions on the handling of postal ballot papers, changes to European voting and candidacy rights, plus improved accessibility measures. This is on top of implementing potentially administratively complicated changes to parliamentary constituency boundaries.

There is only so much that can be successfully implemented at once, and a shorter timetable would significantly jeopardise Returning Officers', electoral professionals' and commercial suppliers' ability to successfully manage poll logistics.

The AEA has published an in-depth overview (sent alongside this letter) of how electoral registration and administration legislation and practice has changed since the Representation of the People Act in 1983, including the Fixed-term Parliaments Act in 2011. This demonstrates that while a 17-day working timetable was always a challenge, it is now logistically impossible.

Changes highlighted include:

- Rolling registration introduction in 2000, including monthly updates where electors can be added or removed from the register. Short notice elections can cause issues for electors around postal vote

issuing if their details are set to change, or if registration and absent vote application deadlines clash with monthly register updates.

- Postal voting on demand being introduced in 2000. While 2019 General Election figures are not available, 8.4million postal votes were issued for the [2017 General Election](#), representing 18% of all electors. This was an increase from 15.3% in 2010 and 16.4% in 2015, and is likely to have risen further in the intervening years.
- Adding personal identifiers to postal vote applications in 2006, and accompanying ballot declarations for each poll – all of which must be cross-checked for security. A necessary but increasingly time-consuming task as postal vote numbers continually increase.
- Online individual electoral registration (IER) introduced by the [Electoral Registration and Administration Act 2013](#) allowing electors to apply to register to vote up to 12 days before the date of poll. The Act extended the UK Parliamentary general election timetable from 17 to 25 days in recognition of the additional pressure IER would bring to the electoral process.
- The removal by the [Electoral Registration and Administration Act 2013](#) of the Representation of the People Act's requirement to postpone parish and community elections falling on the same day as a UK Parliamentary election by three weeks. The complexity of running combined polls with different franchises would be further increased by a shorter timetable. In addition, delaying any other planned polls at short notice would be confusing for electors and problematic for candidates and administrators alike, particularly around absent voting arrangements.
- Reforming the Annual Canvass via [The Representation of the People \(Annual Canvass\) \(Amendment\) Regulations 2019](#). The first reformed canvass ran in 2020 under Covid restrictions, the second is underway and election teams hope will fulfil its aim of increasing registration, particularly among hard-to-reach groups.
- Legislation in 2011 allowing for directly elected Mayors, Combined Authority Mayors, Police and Crime Commissioners and Neighbourhood Planning Referendums, increasing the scope and regularity of polls run by electoral professionals.

Focusing on IER, the [Electoral Commission's report](#) into the running of the 2019 General Election found that registration applications were significantly higher than at the 2017 general election:

- 3.85 million people applied to register to vote.
- 660,000 applied on the last day to register.
- Approximately one in three applications was from an elector who was already correctly registered.
- Only around half of all applications led to an addition to the register.

While IER has been successful for electors, work is still ongoing to properly integrate the frontend gov.uk system with the 300+ electoral registers held on individual local authority Electoral Management Systems.

Dealing with the influx of registration applications before a general election runs alongside processing applications to vote by post or proxy. The security measures for absent voting applications make them a time-consuming by-hand task. In cases where electors are required to submit further evidence to support their application, a shorter timetable would inevitably lead to disenfranchisement.

There have also been significant changes to legislation governing elections in both Scotland and Wales. Franchises are wider and major electoral reform is being considered in Wales. A shorter electoral timetable for a UK Parliamentary general election that could be held at any time has the potential to clash with different electoral timetables, voting systems and franchises within the devolved nations.

Practicalities of organising a nationwide election without prior notice in just 17 days must also be considered. For a general election, electoral administrators:

- book 40,000 polling stations.
- recruit over 100,000 staff.
- print 40 million ballot papers.
- register 6 million new voters.
- issue 7 million postal votes.

Each of these tasks would be hindered by a shorter timetable. Polling station and count venues are not always available or indeed easy to book at short notice. Even though schools must be made available by law for polling, headteachers are pushing back on premises being used, not helped by mixed and ill-timed, if not contradictory, messages from Ministers in 2019 and 2021.

Since 2011, local authorities have undertaken significant savings drives and reduced staff numbers. Local reorganisations have also seen reduced headcounts in amalgamated teams. Leaner election teams have fewer council officers to call on to work at polling stations and election counts. Recruiting and training outside staff has also become harder, particularly as pay rates hover around minimum wage for a busy 15-hour polling day, with additional expectations placed on workers as legislation evolves.

Service outsourcing means in-house printing is practically extinct and Returning Officers rely heavily on external printers for ballot papers, poll cards and postal vote packs. A relatively small number of specialist UK printers have the facilities and security to fulfil election teams'

requirements. A shorter timetable and 'snap' election would create supply chain problems from paper, to printing, to delivery. This was evidenced in the run-up to the May 2021 'Covid' elections, with suppliers struggling to cope at what was a scheduled set of polls.

The postal system would also be placed under great strain, particularly if held at a busy time such as the 2019 General Election just a week before Christmas. Poll cards are sent out in their millions and postal votes can only be sent out after nominations close, leaving little time to deliver and return them, particularly for overseas electors.

The 25-day timetable for the 2019 General Election gave just four weeks to print and issue postal ballot packs, but electors who registered or applied for a postal vote close to the application deadline had only two weeks to receive and return their ballot pack. The [Electoral Commission received feedback](#) from over 500 overseas electors, with the most frequent issue mentioned not receiving their postal vote in time: "Overseas electors were dependent on the speed of the postal service in the country where they live."

Both voter education and the printing and delivery of candidate leaflets would also suffer with a shortened timetable. With less time to get voter participation information circulating, local authorities would be on a back foot, particularly when targeting under registered and hard to reach groups. And while much campaigning is now carried out online, traditional campaigning still has its place, and we worry that both electors and candidates could be affected.

Our united aim is to ensure that our electoral process continues to have the interests of electors at its heart. To be confident of meeting their expectations, we call at the minimum for an unchanged general election timetable and would encourage consideration of an extended timetable.

We all want future elections to run successfully for everyone involved. The proposal to reduce the timetable is ill-conceived, ill-informed and will do nothing but add significant failure risk, reducing confidence in the entire democratic process.

Yours sincerely,

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Chief Executive,
AEA

Mark Heath,
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Elections and Democracy,
SOLACE