

The Association of Electoral Administrators



Kemi Badenoch MP
Minister for Levelling Up
Communities
Department for Levelling Up,
Housing and Communities

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Dear Minister,

Once again scheduled elections have run safely and securely, delivering accurate and trusted results. The headlines were about the results rather than the process, which proves how well managed they were.

We are proud of the commitment and professionalism our members showed in delivering these elections as planned.

The electoral community's attention now turns towards challenges ahead. Implementation of the Elections Act 2022 being the obvious but far from only one.

We are concerned our already straining democratic systems are close to becoming undeliverable. The Elections Act alone introduces momentous change, and therefore risk, we must all carefully manage. But the Elections Act is just part of a complicated jigsaw. There are many other issues at play.

Elections Act 2022

Current projected implementation timelines are optimistic at best, undeliverable at worst, especially for a 'no-fail' service like elections.

Despite the Act receiving Royal Assent last month, fundamental policy decisions are still to come. Until they do, secondary legislation continues to be delayed. This is significantly affecting implementation planning, including sharing with the electoral community how key processes will be delivered.

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Projected timelines give little time for the Electoral Commission to draft guidance for Electoral Registration Officers (EROs), Returning Officers, candidates, and agents. Effective guidance is essential for everyone involved in the electoral process. It is vital in areas where legislative prescription is light, such as providing accessibility adjustments for disabled voters.

A range of new electoral process forms need to be designed. Significant changes are also needed to a myriad of existing forms. This is a substantial task, particularly as these will be required the moment secondary legislation comes into force.

We believe there are still significant issues around digital developments intended to support participation. These include the proposed ERO portal, voter card and online absent voting websites. Numerous processes will rely on successful integration with various existing electoral management software (EMS) systems. A clear understanding of these external dependencies, plus capacity and timescales for EMS suppliers, is crucial.

While supporting the principle of proposed developments, we are worried about inadvertent additional burdens on the electoral community, including suppliers. We fear without careful consideration, there could be an adverse effect on voters, which we all want to avoid.

There is additional complexity in Scotland and Wales. Electoral administrators will need clear infrastructure and guidance to successfully manage these parallel systems. General elections and Police and Crime Commissioner elections will run on different electoral systems to devolved polls. Clear communication from all governments will also be vital to help electors understand different poll requirements and avoid disenfranchisement.

Other current challenges

While the Elections Act has the highest profile, other challenges facing the electoral community include:

- **Boundaries:** with the Parliamentary Boundary Commissions due to report by July 2023, there is significant work ahead to implement proposed changes. These include managing new cross-boundary constituencies, determining Returning Officers, and running polling district reviews.
- **Reorganisation:** local government reviews and reorganisation continue apace, adding further demand in affected areas. This will obviously increase if provisions in the Levelling Up and Regeneration Bill are enacted.

- **Dissolution and Calling of Parliament Act 2022:** the potential for 'snap' general elections has been reintroduced to a significantly more administratively complicated electoral system. We question whether print suppliers, through no fault of their own, will have the capacity to produce millions of poll cards, postal voting packs and ballot papers in the time available. We also have concerns about Royal Mail's capacity to deliver within such tight timescales, not forgetting it must also deal with candidate mailings.
- **Resources:** the loss of experienced electoral administrators from local authorities is a major risk. Attracting and retaining high quality temporary staff is also a growing issue. Increased burdens and stagnating remuneration are significant factors.
- **Venue availability:** identifying and procuring suitable premises for polling stations and counts is an increasing challenge. A lack of joined up working and understanding between UK Government departments does not help, as evidenced by communications around the use of schools.
- **New burdens:** proposed referendums on street naming and 'street votes' on home extensions threaten to have a direct impact on electoral services teams. Adding these to Business Improvement District ballots and Neighbourhood Planning Referendums will increase the potential number and frequency of small polls. This will stretch capacity and resource ever further.

Ready to help

For the Elections Act and all other changes, we remain ready and willing to engage with you and your team to find workable ways to implement them. We know our members are too, and we will continue to amplify their ideas, concerns and experiences as these programmes move forward.

Yours sincerely,



Peter Stanyon
Chief Executive

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