

The Association of Electoral Administrators



The Rt Hon Greg Clark MP
Secretary of State for Levelling Up,
Housing and Communities

Peter Stanyon

Chief Executive
c/o PO Box 201, South Eastern, Liverpool,
L16 5HH

Telephone: 01442 390674
Mobile: 07855 589825
Email: peter.stanyon@aea-elections.co.uk

Date: 11 July 2022

Dear Minister,

Firstly, congratulations on your recent appointment and resuming responsibility for the delivery of democracy for the UK Government.

Given your appointment, I am writing to reiterate the points we previously made to Kemi Badenoch MP, former Minister for Local Government, Faith and Communities.

Elections Act 2022 – Voter ID

In my [post-polls letter of 17 May](#), I stressed that for a ‘no-fail’ service like elections, projected Elections Act implementation timelines were optimistic at best, undeliverable at worst. Since then, the situation has not improved. In fact, it has deteriorated.

With key policy details still to be confirmed, and secondary legislation yet to be published, the Association of Electoral Administrators no longer believes it is possible to successfully introduce Voter ID in May 2023.

To deliver a workable system, with the best outcomes for voters and everyone involved in the electoral process, I am asking for an urgent timetable review.

It is imperative Voter ID works from the moment it is introduced:

- No elector should be disenfranchised by systemic issues, and all must have the information they need to cast their vote.
- Polling station staff need to be confident they understand and can implement new requirements in an accurate and consistent way.
- Returning Officers need sufficient time to make infrastructure amendments to deliver this major change to current processes.

wwwaea-elections.co.uk

The Association of Electoral Administrators

A company limited by guarantee – registered in England and Wales, number 2406897
Registered Office: Harance House, Rumer Hill Road, Cannock, Staffordshire, WS11 0ET

The current timetable threatens to lead to voter disenfranchisement and to confuse candidates and campaigners. Through no fault of their own, Electoral Registration Officers, Returning Officers and electoral professionals will struggle to deliver the trusted elections expected of them.

Over years of continual change, the electoral community has resolutely stepped up to meet every challenge, but the timetable as it stands will prove undeliverable for many. With Returning Officers individually liable for the outcome of elections, this is asking too much of them professionally and personally.

Despite the continuing efforts of your departmental officials, the lack of progress since the Elections Act gained Royal Assent in April is disappointing.

Submitting our detailed feedback on Voter ID, it has become clear its complexity has been underestimated. We no longer feel there is enough time to solve outstanding issues to an acceptable standard.

Our worries also extend to Electoral Commission guidance and publicity. The longer the wait for secondary legislation and policy, the less time the Commission has to develop and deliver comprehensive guidance, revise forms, and run voter education campaigns.

Consistency of understanding and approach at local levels is crucial to maintain trust in our electoral process.

There are also concerns for suppliers. Software development takes time to ensure compliance and functionality. They need sufficient time and understanding to deliver the best solutions to the sector rather than just a minimum viable product.

Additional Elections Act concerns

We are also concerned about implementation timetables for new postal vote handling requirements and online absent vote applications.

The policy allowing electors to hand in postal votes has not been sufficiently thought through to protect voters. More time is needed to examine the potential impact of any change, to ensure no postal votes are rejected due to a lack of communication or understanding.

We are also extremely worried the introduction of online absent vote applications could overwhelm an already stretched print industry.

While appreciating the Government's intention to support Electoral Registration Officers, we believe the potential disenfranchisement of

voters, and burden on Returning Officers and their suppliers, has not been fully considered.

Implementation ahead of a UK Parliamentary general election without a clear comprehension of the possible impact could have a devastating effect. Electors applying close to the deadline could be adversely affected through no fault of their own or that of the professionals administering an already overwhelmed service.

General election

A snap general election will rely on printers being able to source sufficient paper and envelope stock at short notice to print poll cards, absent ballot packs and ballot papers. Global market pressures mean lead-in times to order paper are far longer than usual. We would welcome a conversation on practical solutions to mitigate these very real risks.

Going forward

As always, we remain ready and willing to engage with you and your team to find workable ways to implement the Elections Act and other challenges. However, it would be remiss of me not to be patently clear. I believe the current timeframe is jeopardising safe delivery of our democracy rather than strengthening it.

Yours sincerely,



Peter Stanyon
Chief Executive

cc Paul Scully MP, Minister of State for Levelling Up, Housing and Communities

Lisa Nandy MP, Shadow Secretary of State for Levelling Up, Housing, Communities & Local Government

Mick Antoniw MS, Counsel General and Minister for the Constitution

George Adam MSP, Minister for Parliamentary Business