



House of Commons  
Levelling Up, Housing and  
Communities Committee

---

**Electoral Registration**

---

**Fourth Report of Session 2023–24**

*Report, together with formal minutes relating  
to the report*

*Ordered by the House of Commons  
to be printed 11 March 2024*

## Levelling Up, Housing and Communities Committee

The Levelling Up, Housing and Communities Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Department for Levelling Up, Housing and Communities.

### Current membership

[Mr Clive Betts MP](#) (*Labour, Sheffield South East*) (Chair)

[Bob Blackman MP](#) (*Conservative, Harrow East*)

[Ian Byrne MP](#) (*Labour, Liverpool, West Derby*)

[Natalie Elphicke MP](#) (*Conservative, Dover*)

[Ben Everitt MP](#) (*Conservative, Milton Keynes North*)

[Kate Hollern MP](#) (*Labour, Blackburn*)

[Tom Hunt MP](#) (*Conservative, Ipswich*)

[Andrew Lewer MP](#) (*Conservative, Northampton South*)

[Mary Robinson MP](#) (*Conservative, Cheadle*)

[Nadia Whittome MP](#) (*Labour, Nottingham East*)

[Mohammad Yasin MP](#) (*Labour, Bedford*)

Paul Holmes MP (*Conservative, Eastleigh*) was also a member during this inquiry.

### Powers

The Committee is one of the departmental select committees, the powers of which are set out in House of Commons Standing Orders, principally in SO No 152. These are available on the internet via [www.parliament.uk](http://www.parliament.uk).

### Publication

© Parliamentary Copyright House of Commons 2024. This publication may be reproduced under the terms of the Open Parliament Licence, which is published at [www.parliament.uk/site-information/copyright-parliament/](http://www.parliament.uk/site-information/copyright-parliament/)

Committee's reports are published on the Committee's website at [www.parliament.uk/luhc](http://www.parliament.uk/luhc) and in print by Order of the House.

### Committee staff

The current staff of the Committee are Nicholas Berry (Committee Operations Manager), Gary Calder (Media and Communications Manager), Previn Desai (Clerk), Jack Edwards (Committee Specialist), Jonathan Edwards (Second Clerk), Eldon Gallagher (Committee Operations Officer), Jake Lawrence (Business Administration Apprentice), Alexander Lusuardi (Committee Specialist) and Louise Whitley (Senior Committee Specialist).

### Contacts

All correspondence should be addressed to the Clerk of the Levelling Up, Housing and Communities Committee, House of Commons, London SW1A 0AA. The telephone number for general enquiries is 020 7219 4146; the Committee's email address is [luhccom@parliament.uk](mailto:luhccom@parliament.uk).

You can follow the Committee on X (formerly Twitter) using [@CommonsLUHC](https://twitter.com/CommonsLUHC)

# Contents

---

<b>Summary</b>	<b>3</b>
<b>Introduction</b>	<b>5</b>
The importance of electoral registration	5
How electoral registration currently operates in the UK	5
Registration	5
The electoral registers	5
The annual canvass	6
Event led registration	6
The introduction of photo ID	7
The current state of electoral registers' accuracy and completeness	7
Our inquiry	8
<b>1 The case for reform</b>	<b>9</b>
Current state of the registers	9
Under-registered groups	11
Misconceptions about the use of data and EROs' access to national data	12
Open register	14
<b>2 Solutions to improving the registration system</b>	<b>15</b>
Signposting registration by using data already held by government	15
Improving the annual canvass further	16
Assisted and integrated registration	17
Moving to an automatic voter registration system	18
Using outreach more effectively	20
<b>3 Further changes to the electoral process: the Elections Act 2022</b>	<b>22</b>
Implementing Voter ID	22
May local elections 2023	22
Electoral Commission's recommendations on voter ID post May elections	22
Government response to Electoral Commission's recommendations	23
Implementing the other provisions of the Act	26
Concerns about the collective challenge of implementing the Act in time	26
Change to overseas voter eligibility	27
Impact of the changes on electoral registration officers	28
The Government's view of the upcoming changes under the Elections Act 2022	29

<b>4 The need for the consolidation of election law</b>	<b>31</b>
The volume and complexity of electoral legislation	31
Previous recommendations on rationalising electoral law	32
<b>Conclusion and recommendations</b>	<b>33</b>
<b>Formal minutes</b>	<b>37</b>
<b>Witnesses</b>	<b>38</b>
<b>Published written evidence</b>	<b>39</b>
<b>List of Reports from the Committee during the current Parliament</b>	<b>40</b>

## Summary

Elections are the cornerstone of democracy and voting in elections is a fundamental right owed to many individuals. However, the current state of the electoral registration system, which governs local elections in England and UK general elections, is in need of urgent review. There have been stark warnings from many of those involved in the electoral registration system in the UK -- including the Electoral Commission and the Association of Electoral Administrators -- who have said the current system is not effective nor efficient. This is deeply concerning as the next UK general election is expected later this calendar year.

Recently, the Election Act 2022 imposed new changes on the electoral registration system for the May 2023 local elections, such as voter ID and the use of Voter Authentication Certificates. There were notable issues with the practical implementation of these new changes associated with, for example, individuals without the right ID being prevented from voting and only a limited number of forms of ID being permitted. The Government must address these fundamental issues and ensure that the acceptable forms of voter ID are expanded to ensure individuals are not disenfranchised from voting at the next UK general election and future elections.

More widely, there has been strong concern that the remaining provisions of the Elections Act 2022 will be collectively a bigger challenge to implement than voter ID has been. In particular, there is no sign of when the Government will bring forward the necessary secondary legislation and the detailed guidance. Moreover, to ensure that the electoral registration system is not overwhelmed at the next UK general election, the Government must do its utmost to observe the Gould principle which states that an election is not held within six months of an introduction of a change.

There is also worry that event led registration, a surge of applications in the pre-election period when voting is at the forefront of voters' minds, causes immense pressure on the electoral registration system. This is a particular issue for the electoral registration officers who have already reported a loss of staff with the resulting loss of expertise due to the current strains within the electoral registration system. It is unclear how under resourced and strained electoral registration officers will be able to effectively manage the 3.4 million British Citizens, who live overseas, who will now be able register.

Consequently, to avoid problems associated with event led registration, the Electoral Commission along with other parts of government (such as the Department for Work and Pensions, HM Revenue and Customs, Driver Vehicle and Licensing Agency or HM Passport Office) need to find ways to signpost voters to register to vote or to update their data on the electoral registers at the earliest opportunity. Moreover, these organisations can support a semi-automatic form of voter registration by sharing the information, provided to them by consenting individuals, with electoral registration officers who can then take the necessary action. Furthermore, there should be a review into whether these organisations should require individuals to be on the electoral register, taking into account of those with transient lifestyles and the speed and effectiveness of the registration process.

In the longer-term, there should be a concerted effort to encourage young people to vote; educate them about the importance of voting via educational institutions; and register them to vote. There is an existing foundation for doing this including, for example, that all sixteen-year-olds are sent National Insurance Numbers: this could be an opportunity to signpost young people to register to vote and to educate them on how to register.

The increasing use of signposting and data sharing by the Government should be the first steps towards the ultimate aim of an opt in automated voter registration system. In order to support this the Electoral Commission must set out a detailed plan including milestones and dates for moving towards implementing automated voter registration. In the meantime, the Electoral Commission should also research the possibility of moving to single unique identifiers such as the use of National Insurance numbers for citizens registered to vote as a first step towards a single national register for England.

Elections promote civic engagement and participation. Being registered empowers individuals to actively engage in shaping governance. Electoral registration is the linchpin of democracy because, unless a person is registered to vote, they cannot play their part. Without a fully functioning robust system we have concerns about the future operation of our democracy.

# Introduction

---

## The importance of electoral registration

1. Elections are the cornerstone of our democracy.<sup>1</sup> Ensuring that elections are fair and secure, run smoothly and command the confidence of the electorate is integral to the fabric of society.<sup>2</sup> Electoral registration -- that is, the process by which a person has a valid entry on the register of electors in their local authority in England, Scotland and Wales and the single register in Northern Ireland -- is a pre-requisite to casting a ballot in elections in the United Kingdom. Consequently, it is vital that the process of electoral registration is accessible, easy and convenient to protect the integrity and legitimacy of elections by enabling as many as possible of those enfranchised to be able to vote.<sup>3</sup> Electoral registration is the linchpin of democracy because, unless a person is registered to vote, they cannot play their part.<sup>4</sup>

## How electoral registration currently operates in the UK

2. This part of the report sets out how the electoral registration system operates in the UK, including what the electoral register is; the role of Electoral Registration Officers (EROs); how the annual canvass works; and recent developments, including the increase in event led registration and the requirement for photo ID to vote in elections in England. Lastly, we set out some issues relating to the accuracy and completeness of the register, and the context in which we decided to undertake this inquiry.

### Registration

3. Individual Electoral Registration (IER) has operated in Great Britain since 2014, and in Northern Ireland since 2002. IER makes individuals responsible for their registration and for keeping their details up to date. People need to provide their name, address, date of birth, and National Insurance number to register. This system replaced the Victorian system of Household Registration, which meant that the head of a household registered all eligible voters at a single address. As part of the transition to IER, the government implemented online voter registration in 2014, allowing eligible voters the option of applying digitally. Applications can also be made by post or in person. In this report, we refer to IER as 'electoral registration', the commonly used term.

### The electoral registers

4. There are 363 separate electoral registers across Great Britain rather than one single national register. Northern Ireland, however, has one register maintained by the Chief Electoral Officer.

5. There are two versions of the electoral register: the full version and the 'open register' (known as the 'edited register' in Northern Ireland).<sup>5</sup> The full version of the electoral

---

1 HC Deb, 8 February 2021, [col773WS](#) (Commons written ministerial statement)

2 Electoral Commission: [Democracy and Diversity: Equality, Diversity and Inclusion Strategy](#), November 2021

3 Electoral Commission Annual Report and Accounts 2022/23: [Objective: Accessible registration and voting](#)

4 Cabinet Office, [Simplifying the transition to Individual Electoral Registration](#), October 2013

5 Gov.uk, [The electoral register and the 'open register'](#), January 2024

register contains the names and addresses of all of those registered to vote in a local area. This full version of the register can only be used for electoral administration purposes (such as sending out poll cards before elections and campaigning); preventing and detecting crime; checking applications for loans or credit; or jury summoning in England, Wales and Northern Ireland.<sup>6</sup> The open register contains less detail and is available to anyone who wants to buy a copy.

6. There is also a way for voters to register and remain anonymous if they believe that their name and address being on the electoral register could affect their safety, or the safety of someone in their household - for example a victim of domestic abuse. They will be recorded on the full register and able to vote, but their name and address will not be disclosed to anyone by the electoral registration office unless there is a legal requirement to do so. Anonymous registration only lasts for one year, so the individual must reapply each year. Their electoral registration office will contact them when it is time for them to reapply.<sup>7</sup>

7. Decisions to accept or reject applications for registration are made by electoral registration officers (EROs), who verify electors' identities and check the information provided against various data sources. EROs are statutorily responsible for compiling and maintaining complete and accurate electoral registers for their local areas. The Electoral Commission monitors EROs' performance, provides guidance and resources and sets standards.

### **The annual canvass**

8. EROs are required to conduct an annual canvass and publish a revised register on 1 December each year. The canvass is intended to ensure the register is current and accurate, listing all eligible voters.

9. In February 2021, the Government implemented the '*Canvass Data Match*', which allows EROs to match their registers against data from the Department for Work and Pensions (DWP). This information is used to target resources at households where details are most likely to have changed. The Canvass Data Match replaced the previous burdensome process whereby EROs had to chase responses from every household, including visiting in person.

### **Event led registration**

10. Recently, there has been an increasing trend towards 'event-led' registration: a surge of applications in the pre-election period when it is at the forefront of voters' minds. In 2019, after the General Election was called more than 3 million people registered to vote (29 Oct 2019–26 Nov 2019); in the same period before the 2017 General Election the figure was just over 2.3 million.<sup>8</sup> Event led registration puts considerable pressure on EROs

---

6 Gov.uk, [Opt out of the open register](#), January 2024

7 Electoral Commission, [Register to vote anonymously](#), January 2024

8 Electoral Reform Society ([ELR0003](#))

as deadlines fast approach - EROs were dealing with upwards of 100,000 registration applications per day in 2019 in the run up to the election.<sup>9</sup> In its written evidence, the Government acknowledged event-led registration was now “accepted behaviour”.<sup>10</sup>

### ***The introduction of photo ID***

11. In April 2022, the Elections Act 2022 changed electoral law on absent voting and on eligibility to vote for overseas voters and EU citizens. It also introduced the requirement to show photographic ID at polling stations to vote for UK parliamentary elections, police and crime commissioner elections in England and Wales, and local elections in England. It was implemented for the first time at the local elections in May 2023.

12. In May 2023, the government also confirmed that voter ID would be extended to postal and proxy voting. The rest of the provisions of the Elections Act 2022 are due to be implemented at the next general election, including changes to absent voting and extending the right to vote of overseas voters and EU citizens.

### ***The current state of electoral registers' accuracy and completeness***

13. The Electoral Commission's 2023 report on the accuracy and completeness of the registers estimated that up to eight million people were missing from the register, and millions more were not registered accurately.<sup>11</sup> This means that millions of individuals who ought to be registered to vote to ensure confidence in democracy and to prevent marginalisation of certain groups in society are not included on current registers.<sup>12</sup> As well as the problem of people missing from the registers, it is possible to be registered twice in different places because in the UK, electors do not have a unique identifier for voting and because there is not one single national register (so called duplicate registration). Also, if electors do not remember to update their entry when moving, EROs can remove them from the register if they do not respond to the annual canvass. It is widely understood that improving registration strengthens the legitimacy of the electoral process and promotes participation, inclusivity and representation.<sup>13</sup> As Parliamentary Under-Secretary of State for Local Government and Building Safety Lee Rowley MP said:

There are few tasks more important in public life than maintaining the trust of the British public in our electoral institutions and our electoral processes.<sup>14</sup>

14. It was in light of concerns about eligible individuals missing from the electoral registers and the impact of substantial changes arising from the Elections Act 2022 that we decided to conduct this inquiry.

---

9 Electoral Reform Society ([ELR0003](#))

10 Department for Levelling Up, Housing and Communities ([ELR0005](#))

11 Electoral Commission, [2023 report: Electoral registers in the UK](#), January 2024

12 Electoral Commission, [Democracy and Diversity: Equality, Diversity and Inclusion Strategy](#)

13 Electoral Commission Annual Report and Accounts 2022/23: [Objective: Accessible registration and voting](#)

14 Electoral Commission Annual Report and Accounts 2022/23: [Objective: Accessible registration and voting](#)

## Our inquiry

15. Our inquiry focuses on the specific changes arising from the Government's Elections Act 2022 which relate to voter registration and on the impact of these legislative changes on electoral registration officers. We also collected evidence on the impact of the voter ID requirement on both voters and administrators at the local elections.

16. We received 12 written evidence submissions and held four oral evidence sessions. Our witnesses included returning officers, representatives of local government, academics, charities, the Electoral Commission, and representatives of Government including Simon Hoare MP (Parliamentary Under Secretary of State (Local Government) at the Department for Levelling Up, Housing and Communities).

17. We also travelled to Ottawa and Toronto in Canada to gain a better insight into the semi-automated system of voter registration in operation there. The Canadian system of electoral registration is broadly comparable to the UK's as, unlike in many other countries, the UK and Canada do not have a civil population register from which electoral registers are derived. The Canadian system has resulted in electoral registers with considerably higher rates of accuracy and completeness than in the UK.<sup>15</sup> We heard directly from Elections Canada, the agency responsible for administering Canadian federal elections, as well as from Canadian Government ministers responsible for elections policy. We saw in practice how data sharing between public agencies works and heard about the Canadian experience of implementing voter ID, which has been used in federal elections since 2007.

18. We wish to thank all those who contributed to our inquiry and helped us shape our recommendations. We also wish to thank our specialist advisers for their input throughout our inquiry: Aileen Murphie, Honorary Professor, Durham University Business School, and Professor Tony Travers, School of Public Policy, London School of Economics.

# 1 The case for reform

19. This chapter sets out the current issues and problems with electoral registration which were raised in evidence. These include: the overall accuracy and completeness of the register; the extent of under registration amongst particular groups in the population including young people, disabled people and those who are more transient; problems which Electoral Registration Officers (EROs) encounter in accessing existing data sources to improve the accuracy and completeness of the register; and disengagement amongst some potential voters from the political process.

## Current state of the registers

20. The Electoral Commission runs accuracy and completeness studies to measure the quality of the electoral registers each year. It assesses how quality is changing in response to legislation and administrative and population changes. ‘Completeness’ measures whether those eligible to be registered are actually on the electoral registers. The Electoral Commission’s 2023 report, “Electoral registers in the UK”, found that completeness of the registers in the UK is at 86%. ‘Accuracy’ looks at the number of false entries on the electoral registers and is currently at 88%. This means that potentially as many as eight million people were not correctly registered at their current address and people may be registered twice inadvertently. The completeness of the electoral registers in Great Britain is 86%.<sup>16</sup> The Commission explained that “if a UK general election was called now, around 14% of the eligible population would not be able to vote.”<sup>17</sup>

**Completeness and accuracy of the December 2022 local government and parliamentary registers in England**



Source: Electoral Commission

<sup>16</sup> Electoral Commission, [2023 report: Electoral registers in the UK](#), January 2024

<sup>17</sup> Correspondence from the Electoral Commission, [15 September 2023](#)

21. The Electoral Commission’s recent annual canvass report concluded that:

people continue to face both practical and knowledge barriers to registering to vote under the current system. These include misunderstanding about the registration process and incorrect assumptions about whether people are already registered, and low levels of urgency or priority to register to vote.<sup>18</sup>

22. The Chair of the Electoral Commission, John Pullinger, told us that the electoral registration system was “neither effective nor efficient. It does not work for voters. It does not work for parties. It does not work for electoral administrators”.<sup>19</sup> The Electoral Commission told us that ‘urgent reform’ was needed.<sup>20</sup> The Association of Electoral Administrators (AEA), representing electoral staff, agreed stating that:

We have an 1800s system with things being grafted on top of that. It is still working. It is being held together with gaffer tape in places. We would love to see the whole system reviewed from the bottom up.<sup>21</sup>

23. Toby James, Professor of Politics and Public Policy and Co-Director of Electoral Integrity, Project, at the University of East Anglia told us the UK’s electoral registration system ranked 58th out of 169 countries on the Electoral Integrity Project.<sup>22</sup>

24. The representative bodies of groups who form part of the electoral process also told us of problems with the system. For example, the Society of Local Authority Chief Executives (SOLACE), which represents local authority chief executives who act as Returning Officers, responsible for ensuring local and national elections are administered effectively,<sup>23</sup> argued that the system is “fragmented and unfit for purpose ... and in desperate need of modernisation and reform”.<sup>24</sup> Similarly, the Joseph Rowntree Reform Trust told us that the electoral registration system is “creaking and leaking”.<sup>25</sup>

25. However, the Government told us that the current system was “embedded and well-understood” and that it “strikes the right balance of accessibility, accuracy and individual freedom of choice.”<sup>26</sup> When we questioned Simon Hoare MP, Parliamentary Under Secretary of State for Local Government, on what he thought of the electoral registration system, he told us:

one can take a horse to water but one cannot make it drink. You can promote as much as you like. You can advertise; you can have public awareness campaigns. Think of the great work that the commission does in television advertising, online promotion and so on. We cannot force people if they do not wish to register.<sup>27</sup>

---

18 Electoral Commission, [2023 report: Electoral registers in the UK](#), January 2024

19 [Q211](#) [John Pullinger CB, Chair, Electoral Commission]

20 [Letter from the Electoral Commission to the Chair dated 12 September 2023 concerning electoral registration follow up questions](#)

21 [Q121](#) [Peter Stanyon, Chief Executive, Association of Electoral Administrators]

22 [Q2](#) [Professor Toby James, Professor of Politics and Public Policy and Co-Director of Electoral Integrity]

23 Electoral Commission, [Returning officer role and responsibilities](#), January 2024

24 Solace ([ELR0007](#))

25 [Q131](#) [Fiona Weir, CEO Joseph Rowntree Reform Trust]

26 Department for Levelling Up, Housing and Communities ([ELR0005](#))

27 [Q235](#) [Simon Hoare MP, Parliamentary Under-Secretary of State (Local Government), Department for Levelling Up, Housing and Communities]

26. **The Government told us that the current system of individual electoral registration strikes the right balance of accessibility, accuracy and individual freedom of choice. The evidence we received does not back this statement up - in fact, it suggests the opposite, with potentially as many as eight million people not correctly registered at their current address, the UK ranking 58th out of 169 countries on the Electoral Integrity Project as well as the Electoral Commission itself describing the current system as “neither effective nor efficient” and asking for its “urgent reform”.**

### Under-registered groups

27. The headline rate of completeness of the electoral register of 86% masks differences in registration levels in the population in the UK, as some demographic groups are less likely to be registered than others. This means that not all people are equally able to vote with the potential for undermining the fairness and legitimacy of elections.<sup>28</sup>

28. Young people, renters, people from ethnic minorities and those in lower socio-economic groups are less likely to be registered to vote.<sup>29</sup> The Electoral Commission’s 2023 report states:

- i) Levels of completeness of the registers are lowest for attainers<sup>30</sup> aged 16–17 and rise with age. In Great Britain completeness for 16–17 years olds has dropped markedly from 45% in 2015 to 16% in 2022. In comparison, 96% of people over 65 are registered.
- ii) Only 58% of private renters are on the register compared to 91% of those that own their house. Greater mobility is associated with lower levels of completeness.
- iii) Completeness is less among those in lower socio-economic income groups, and lowest in DE households.<sup>31</sup> With the exception of Scotland, completeness is highest among those in AB households.<sup>32</sup>
- iv) Since 2018, completeness rates for those from black ethnic backgrounds has fallen from 75% to 72%. Completeness is highest among those from a white ethnic background.<sup>33</sup>

29. We were told by Disability Rights UK that some disabled people do not feel supported to register to vote, particularly struggling with the lack of variety in communication channels and the “one-size-fits-all process”.<sup>34</sup> Fazilet Hadi, Director of Policy, Disability Rights UK said:

---

28 Electoral Commission: [Democracy and Diversity: Equality, Diversity and Inclusion Strategy](#)

29 [Q131](#) [Fiona Weir, CEO Joseph Rowntree Reform Trust]

30 Electoral registers include people who will reach the age of 18 in England and 16 in Scotland and Wales, and will therefore become able to vote (dependent on the franchise for each election), during the lifetime of the register. This group is referred to as attainers.

31 Socio-economic classification produced by the UK Office for National Statistics: DE means Semi-skilled & unskilled manual occupations, Unemployed and lowest grade occupations

32 Socio-economic classification produced by the UK Office for National Statistics: Higher & intermediate managerial, administrative, professional occupations

33 Electoral Commission, [2023 report: Electoral registers in the UK](#), January 2024

34 [Q132](#) [Fazilet Hadi, Director of Policy, Disability Rights UK]

Some of the barriers are that information and communication are not accessible. It is not in a range of formats; it is either digital or paper based. It is not using enough channels, whether that is telephone or audio or braille or easy read.<sup>35</sup>

30. Disability Rights UK felt it was unrealistic for those with a disability to register just by being sent an invitation in an annual canvass.<sup>36</sup> Fazil Hadi, who is registered blind, explained how it affected him:

There is no sense of any recording of our communication needs, so—guess what?—my bank knows that I am blind or my utility company knows. Even my local authority knows, because it has given me a registration card, but none of the services, including electoral registration, know my communication needs. For all my life I have received paper-based information from electoral registration, which is completely inaccessible to me. There is no recording processes, whether it is the online processes, paper-based processes or going to my polling station.<sup>37</sup>

31. We also heard concerns about those who are digitally excluded finding the process more difficult.<sup>38</sup>

**32. Rates of electoral registration are significantly lower amongst some groups in the UK, such as the young, those who move house frequently and private renters, implying some level of marginalisation and exclusion. Tackling under-registration among hard-to-reach groups will need to involve a variety of methods and approaches.**

**33. We consider it is important for local authorities and EROs to understand the communication and access needs in order to ensure that people with disabilities are not shut out of the electoral process. We find it totally unacceptable that local authorities are contacting people with disabilities without taking into account their communication needs. *The Electoral Commission should undertake further research to identify effective ways to make registration easier and more accessible for people with disabilities.***

## Misconceptions about the use of data and EROs' access to national data

34. We received evidence which suggests that people have misconceptions about how their data is, or might be, used; for example, some returning officers cited anecdotal evidence of people thinking they are already registered because they pay taxes.<sup>39</sup> In fact, as the Electoral Commission pointed out, there is a lack of provision for EROs to access national data, despite the implementation of the Canvass Data Match.<sup>40</sup> For example, EROs can only check applications against the DWP customer information service dataset

35 [Q132](#) [Fazilet Hadi, Director of Policy, Disability Rights UK]

36 [Q132](#) [Fazilet Hadi, Director of Policy, Disability Rights UK]

37 [Q132](#) [Fazilet Hadi, Director of Policy, Disability Rights UK]

38 [Q132](#) [Fazilet Hadi, Director of Policy, Disability Rights UK]

39 Professor Toby S. James (Professor of Politics and Public Policy at University of East Anglia); Dr Holly Ann Garnett (Associate Professor of Political Science at Royal Military College of Canada) ([ELR0006](#)) Mrs Amanda Edwards (Electoral Services and Civil Registration Manager at Carmarthenshire County Council) ([ELR0001](#))

40 The Electoral Commission ([ELR0004](#))

(the closest the UK has to a civil population register), and then send out a communication asking the elector to update their information, rather than using the data directly to improve the accuracy or completeness of the register.<sup>41</sup>

35. EROs are not automatically entitled to access or use additional contact information beyond names and addresses, such as email or phone numbers. The AEA described difficulties in accessing specific information:

In some cases, for example Registrars' death records, there is no legislative provision to share data except by making a physical copy available for inspection. As a result, where an ERO seeks to access and use additional contact information [...] they require a data sharing agreement to be in place between the local authority and the ERO, and the local authority to have informed individuals about the potential sharing of such information with the ERO through their privacy notice.<sup>42</sup>

36. Furthermore, Professor Clark, Professor of Political Science, Newcastle University, told us that:

It may require changes to data protection law to resolve some of these issues. I believe there are protections around the DWP data that prevent EROs from using them to the extent that they might like. However, I am not sure that we know the extent of the data sources we might be able to use because they are all fairly decentralised and fragmented.<sup>43</sup>

37. Lastly, EROs and the Electoral Commission both told us that many people choose actively not to register or do not have a sense of urgency to meet deadlines, due to disengagement from and disillusionment with politics.<sup>44</sup> Some actively choose not to register in case they lose certain benefits (such as declaring a partner is living with them) due to misunderstandings about how their data may be used.<sup>45</sup>

**38. There are material barriers for individuals registering to vote, including a lack of knowledge of the process and misunderstandings about the use of their data. While we accept that a proportion of those missing from the register will include individuals who do not wish to vote at all, we find it a matter of deep concern that there are increasing numbers of individuals not registered to vote; for example, completeness for attainers has dropped markedly from 45% in 2015 to 16% in 2022.**

**39. *The Electoral Commission should, with local authorities and academics, undertake more research on effective ways to encourage people who do not vote, and make recommendations to central and local government as to how people can be encouraged***

---

41 Professor Toby S. James (Professor of Politics and Public Policy at University of East Anglia); Dr Holly Ann Garnett (Associate Professor of Political Science at Royal Military College of Canada) ([ELR0006](#))

42 Association of Electoral Administrators ([ELR0009](#))

43 [Q16](#) [Professor Alistair Clark, Professor of Political Science, Newcastle University]

44 Mrs Amanda Edwards (Electoral Services and Civil Registration Manager at Carmarthenshire County Council) ([ELR0001](#)) and The Electoral Commission ([ELR0004](#))

45 Mrs Amanda Edwards (Electoral Services and Civil Registration Manager at Carmarthenshire County Council) ([ELR0001](#)) and Professor Toby S. James (Professor of Politics and Public Policy at University of East Anglia); Dr Holly Ann Garnett (Associate Professor of Political Science at Royal Military College of Canada) ([ELR0006](#))

***to take part in the democratic process. Elections promote civic engagement and participation. Being registered empowers individuals to actively engage in shaping governance.***

## Open register

40. EROs are required to publish two versions of the register of electors - full and edited, the latter is also known as the ‘open register’. The open register lists the names of all electors who have not ‘opted out’. Access to the open register is not restricted. It is available for sale to any person who wishes to buy a copy and the data in it may be used for any purpose. Credit referencing agencies are legally able to commercially sell details of any elector appearing on the open register<sup>46</sup>.

41. The fact that there is a version of the electoral registers in England which is open and can be accessed and then sold to third parties has been subject to sustained criticism.<sup>47</sup> Many, including the Electoral Commission, SOLACE, the AEA and the Electoral Reform Society, have called for the open register to be abolished.<sup>48</sup> Professor James, Professor of Politics and Public Policy and Co-Director of Electoral Integrity, Project, University of East Anglia, described the cyber security threat arising from the register being open:

Overseas actors could purchase the data and compile it into a single dataset for malign purposes. For example, it would be possible to identify marginal constituencies and then micro-target voters with postal misinformation about the voting process to discourage them to vote. The open/edited register serves no electoral purpose and should therefore be abolished to safeguard against this threat.<sup>49</sup>

42. Peter Stanyon, Chief Executive of the AEA, argued that not to have any restrictions on what the data in the open register can be used for “flies in the face of everything else around data”, and argued that the sale of the register is “incompatible from a citizen’s perspective—selling people’s personal data to anyone who is interested in buying”.<sup>50</sup> John Pullinger, the Chair of the Electoral Commission, told us that “[w]e should abolish it. It is not serving a useful purpose.”<sup>51</sup> However when Minister Hoare was questioned on this, he said the Government had no intention to change the open register.<sup>52</sup>

***43. The availability of the open register raises concerns about hostile actors attempting to distort our democracy. However, we recognise that credit checking agencies utilise the register to confirm the address of individuals. Without such access individuals may be denied credit or other services. We therefore recommend a review on which types of companies can purchase the open register with an individual’s consent.***

---

46 Association of Electoral Administrators ([ELR0009](#))

47 The Electoral Commission ([ELR0004](#)), Solace ([ELR0007](#)), Association of Electoral Administrators ([ELR0009](#)) and the Electoral Reform Society ([ELR0003](#))

48 The Electoral Commission ([ELR0004](#)), Solace ([ELR0007](#)), the Association of Electoral Administrators ([ELR0009](#)) and the Electoral Reform Society ([ELR0003](#))

49 Professor Toby S. James (Professor of Politics and Public Policy at University of East Anglia); Dr Holly Ann Garnett (Associate Professor of Political Science at Royal Military College of Canada) ([ELR0006](#))

50 [Q87](#) [Peter Stanyon, Chief Executive, Association of Electoral Administrators]; Association of Electoral Administrators ([ELR0009](#))

51 [Q213](#) [John Pullinger CB, Chair, Electoral Commission]

52 [Q240](#) [Simon Hoare MP, Parliamentary Under-Secretary of State (Local Government), Department for Levelling Up, Housing and Communities]

## 2 Solutions to improving the registration system

---

44. This chapter sets out potential solutions to the problems we identified with electoral registration in the previous chapter. The solutions proposed to us include using information already held by government to signpost people to registration; for example, when they contact a public body for another purpose, such as applying for a driving licence; improving the annual canvass further; and moving to partial or fully automatic registration where people are added or their details updated on the register automatically.

45. The Chair of the Electoral Commission, John Pullinger, told us that “something quite radical” was needed “so that people are not left off in the way that they have been increasingly over the last quite a few years”. He added that a “step-by-step approach, with the ambition of making sure everybody who could be registered is registered, seems to be entirely within our grasp”.<sup>53</sup> The Commission also told us that:

Evidence from our research, carried out over more than a decade, shows that this is a longstanding problem. It is therefore unlikely that levels of accuracy and completeness—and therefore the number of eligible people able to have their say at elections—will significantly improve without major changes to the electoral registration system.<sup>54</sup>

### *Signposting registration by using data already held by government*

46. ‘Signposting’ registration involves individuals being provided with information about registering to vote when contacting a public body, such as the DVLA, HM Passport Office (HMPO), or HMRC for another purpose. Equally the government could signpost citizens to registration when the government contacts potential voters; for example, the Department of Work and Pensions (DWP) writes to all those reaching sixteen years of age to issue them with a National Insurance number to enable them to be taxed, and in this communication attainers could then be signposted towards registering to vote.

47. In its 2023 report, the Electoral Commission urged the Government to consider immediately options for signposting registration.<sup>55</sup> The Electoral Commission gave the specific example of using tenancy deposit schemes to signpost electoral registration, by means of a link to the Register to Vote website. The three authorised tenancy deposit schemes hold deposits of six million tenants. Frequent movers and people in the private rented sector, as highlighted in the previous chapter, are a group least likely to be registered to vote. Signposting registration would not require legal changes to implement.<sup>56</sup>

48. ***Public bodies such as DVLA or HM Passport Office should prompt individuals to register or update their details on the electoral register when they are using public services, such as driving licence applications or passport renewals. In addition, we recommend that signposting voter registration when national insurance numbers are issued to citizens who reach sixteen years of age would be a way of ensuring that more***

---

53 [Q211](#) [John Pullinger CB, Chair, Electoral Commission]

54 Correspondence from the Electoral Commission, [15 September 2023](#)

55 Electoral Commission, [2023 report: Electoral registers in the UK](#), January 2024

56 Electoral Commission, [2023 report: Electoral registers in the UK](#), January 2024

*young people are entered on the electoral register. We expect the DWP, DVLA and HM Passport Office to write to us within three months of this Report being published to set out their plan for implementing these recommendations.*

## Improving the annual canvass further

49. Following the reform of the annual canvass, and the implementation of the ‘*Canvass Data Match*’ in February 2021, (covered in an earlier section of the report) we heard that administration of the canvass had improved and had been made cheaper to run.<sup>57</sup> However, the Electoral Commission believed that these reforms had not gone as far as needed. Its Chair told us that:

frankly, it is tinkering compared with the challenges that we have talked about and the levels of under-registration that we have. It is not shifting the dial on that in any way.<sup>58</sup>

The Electoral Commission’s report on the 2022 canvass concluded that the canvass was not keeping pace with population movement and the volume of changes to the register which households moving entails. Of the households identified as being likely to have a change, a third did not respond to the annual canvass.<sup>59</sup> Amanda Edwards, the Chair of the AEA Wales branch, stated that one of the problems was the data the canvass was based on:

We are data matching against limited records that are available to us, some of which are not up to date at the time of data matching ... . We have no audit of whether that householder has received or indeed read the letter, hence we could be missing vital information.<sup>60</sup>

50. Liz Owen, Deputy Director for Registration and Franchise at DLUHC, explained that the function of the reform of the canvass had been to:

give EROs more tools to use to contact those households, so now they can use email and they can phone them, as well as writing to them and knocking on their door.<sup>61</sup>

51. Whilst being critical of the annual canvass, the Electoral Commission and various academics have suggested that it should continue in the absence of more fundamental reforms, such as more automated voter registration.<sup>62</sup> They felt that it helped limit event-led registration and the pressure on electoral registration officers around election time.

---

57 [Q22](#) [Professor Toby James, Professor of Politics and Public Policy and Co-Director of Electoral Integrity, Project, University of East Anglia]; Association of Electoral Administrators ([ELR0009](#))

58 [Q224](#) [John Pullinger CB, Chair, Electoral Commission]

59 Electoral Commission, [Electoral registration in Great Britain in 2022](#)

60 Mrs Amanda Edwards (Electoral Services and Civil Registration Manager at Carmarthenshire County Council) ([ELR0001](#))

61 [Q256](#) [Liz Owen, Deputy Director for Registration and Franchise, Department for Levelling Up, Housing and Communities]

62 [Q27](#) [Professor Toby James, Professor of Politics and Public Policy and Co-Director of Electoral Integrity, Project, University of East Anglia]; [Q38](#); [Q52](#) [Louise Round, Head of Elections and Democracy, Solace]; [Q212](#) [Ailsa Irvine, Director of Electoral Administration and Guidance, Electoral Commission]; [Q214](#) [John Pullinger CB, Chair, Electoral Commission]; [Q223](#) [Ailsa Irvine, Director of Electoral Administration and Guidance, Electoral Commission]

### ***Assisted and integrated registration***

52. Assisted registration means that EROs can be assisted by data already held by government. This process would give EROs greater access to data from certain government bodies and the ability to use this to send out targeted invitations to register to specific individuals.

53. Integrated registration involves a person being asked when they are filling in their personal information on a public service website whether this data can be transferred to the electoral register, either to register them to vote or to update their information if already registered. For example, individuals would be asked if their data can be transferred when they update their driving license addresses with the DVLA (up to 4 million people per year do this).

54. With assisted or integrated registration, the citizen would still need to take affirmative steps to be added to the register - there would be no automatic transfer of their data. If they declined or did not respond to the prompt, the voter would not be registered or their data updated. This route would also enable the individual to register to vote anonymously (see earlier section on the different types of electoral registers which discusses how people can protect their details) or provide details regarding eligibility to vote. Canada operates this system, as outlined in Box 1 below.

#### **Box 1: Canadian assisted voter registration**

Canada uses a form of assisted voter registration, where the onus is on individuals to register to vote but where there is considerable assistance from the state. Individuals must provide consent to be registered by opting in to being added to the electoral register.

Existing lists from government agencies and departments are shared with electoral management bodies. There are multiple agreements with various government agencies, including the Canada Revenue Agency, Citizenship and Immigration, National Defence, Provinces and Territories, and Statistics Canada.

For example, when an individual files their annual tax return, or files for citizenship, they can check a box to confirm they consent to share their details with Elections Canada.

This means that as individuals move, turn 18 or die, their registration can be automatically updated in Elections Canada's National Register of Electors. Voters can also proactively update their information through an online portal or at the polling station.

0.02% of Canadians actively opted out of being registered on the National Register of Electors.

Source: Canada Visit

55. The Electoral Commission and others are supportive of the move to assisted or integrated registration in the UK.<sup>63</sup> The Electoral Commission, in its report of September 2023, explained that the Government would need to “legislate to provide a legal gateway to

63 The Electoral Commission ([ELR0004](#)), Solace ([ELR0007](#)), the Association of Electoral Administrators ([ELR0009](#)), and Electoral Reform Society ([ELR0003](#))

share information in this way” to make these changes and also recommended the creation of a centralised data processing service (or an extension of the IER Service) to support transfer of data between organisations and EROs.<sup>64</sup>

56. **Citizens in the UK already supply the government with information necessary for voter registration when they apply for a passport or driving licence (for example citizens’ information is held in various government databases). This information could and should provide the basis for an entry on the electoral register which could then be taken forward by EROs. We also support the Electoral Commission’s aims of improving the accuracy and completeness of the registers.**

57. *We therefore recommend that legislation be brought forward by the Government to enable the sharing of data held by DVLA, DWP, and HM Passport Office with EROs and to enable EROs to use that data fully. A review should be held to consider if the registration with DVLA, HM Passport Office and DWP should require electoral registration. This review should take into account those with transient lifestyles and the speed and effectiveness of the electoral registration process.*

### **Moving to an automatic voter registration system**

58. Automatic voter registration would mean that individuals are added to the electoral register, or have their details updated, based on data held by the government and without them being required to take any active steps, even to consent.

59. Citizens would be notified that they are to be added to the electoral register or that their data is to be updated. If they take no action, they will be registered to vote. Most automatic registration systems offer an ‘opt out’: an opportunity for the citizen to respond and decline within a given date. The ‘opt-out’ could be restricted to those who have a valid reason<sup>65</sup> for not wanting to be added automatically or provide all with the opportunity to decline registration. Countries such as Sweden operate an automatic voter registration system.

60. The Electoral Commission has said that a move to automatic voter registration “would represent an in-principle acceptance of the idea that the state may in certain circumstances take proactive steps to register citizens without their consent.”<sup>66</sup> It would thereby switch the “unregistered” default status of citizens.

61. The Electoral Commission carried out a feasibility study for automatic registration using HMPO data. Its report published in September 2023 stated:

Passport data is already shared with around 80 government departments and public sector bodies to carry out around 25 million identity checks each year. HMPO forecasts that it will receive around 7.4 million passport

64 Electoral Commission, [2023 report: Electoral registers in the UK](#), January 2024

65 In systems where registration is the law, religious groups have an opt out where their religious views do not allow them to vote for example [Jehovah’s Witnesses](#). Q85 [Amanda Edwards, Chair of AEA Wales Branch and Elections Manager at Carmarthenshire County Council]

66 The Electoral Commission ([ELR0004](#))

applications in the next year. [...] Once HMPO has verified the identity of an applicant, this data could be transferred to EROs to automatically register them to vote.<sup>67</sup>

62. John Pullinger, Chair of the Commission, told us that “a much more automated system is entirely possible. It is the norm in many countries”.<sup>68</sup> Ailsa Irvine, Director of Administration at the Electoral Commission, explained to us:

We have identified that these are reforms that could be implemented without a radical overhaul of the fundamental structure of how electoral registrations run in the UK. We have the individual registration and digital service, which already provides a hub and a way of data coming in from voters, being checked with the DWP and going back to electoral registration officers.<sup>69</sup>

63. Academics maintained in evidence to us that automatic voter registration reduces the burden on citizens and supports groups who experience practical barriers to voting and are less likely to register to vote, thereby improving the accuracy and completeness of the register.<sup>70</sup> My Vote My Voice, a charity representing those with learning disabilities and autistic people, argued automatic voter registration would:

ensure that those who do not have support to complete forms or are not aware of their right to vote, join the electoral register. This would have a trickle-down effect on awareness of voting rights, with the arrival of polling cards and other materials from local authorities.<sup>71</sup>

64. The Welsh Government introduced a bill in October 2023 to implement automatic voter registration for elections to the Senedd and local councils. If passed, the changes envisaged will be in place by 2026–7, after the completion of a pilot programme with local authorities. The Welsh Government has said that it plans to use datasets for electoral registration that already exist, such as data from the NHS and the DWP. The Welsh Government has explained that this change “would be an important first step in the work that is needed by Welsh government to tackle voter disengagement and increase voter turnout”.<sup>72</sup> However, it has been argued that the changes would “cause unnecessary confusion” for Welsh voters, who would have different rules for different elections<sup>73</sup> unless the electoral registration system also changed for the UK Parliament general elections.

65. In contrast the UK Government told us that there is currently no public service which, as part of its application procedures, captures all the data which is required to determine eligibility to vote and therefore it is not possible “to easily implement a system of fully automatic registration”.<sup>74</sup> The Government argued that an automatic system would add people to the register without their knowledge, which is something they had moved

67 Electoral Commission, [2023 report: Electoral registers in the UK](#), January 2024

68 [Q212](#) [John Pullinger CB, Chair, Electoral Commission]

69 [Q212](#) [Ailsa Irvine, Director of Electoral Administration and Guidance, Electoral Commission]

70 Professor Toby S. James (Professor of Politics and Public Policy at University of East Anglia); Dr Holly Ann Garnett (Associate Professor of Political Science at Royal Military College of Canada) ([ELR0006](#))

71 My Vote My Voice ([ELR0008](#))

72 BBC News, [Voters to be automatically registered in Wales](#), 19 September 2023

73 Sky News, [New law to automatically register voters will ‘remove barriers’, Welsh government claims](#), 2 October 2023

74 Department for Levelling Up, Housing and Communities ([ELR0005](#))

away from since 2014 with the introduction of IER.<sup>75</sup> It believed it would bring “a greater propensity for inaccuracies such as more out of date information, or information being held against the wrong address”.<sup>76</sup> The Government was also concerned that it would add people who were not eligible, such as Commonwealth citizens without the correct immigration status, or would perhaps inadvertently give people with second homes a second vote.<sup>77</sup> Minister Hoare told us:

the act of voting is an important part of our citizenship. It is part of the contract between the citizen and the state. People should think about registration to allow them to take part in our democratic processes. I think there has to be a certain amount of personal responsibility and motivation to do that, [...]. That interest has to be prompted by a whole variety of promotion points, but in essence it is part of that relationship between the individual and the state if they wish to take part as an active democratic citizen [...] I do not think it is unreasonable to expect the individual to make the effort to join the register themselves. It is part of that contract.<sup>78</sup>

**66. We acknowledge the Government’s concerns about automatic registration, but we do not believe they are insurmountable because other countries of the world have managed to overcome them. We therefore recommend that the Government adopt a strategy to move towards an opt in automated voter registration system over the next few years, while monitoring the pilot in Wales. The Electoral Commission should write to us in 4 weeks with a detailed plan including milestones and dates for moving towards implementing automated voter registration with a clear outline of how people can protect their data privacy.**

**67. In the meantime, the Electoral Commission should research the possibility of moving to single unique identifiers for citizens registered to vote as a first step towards a single national register for England and to address the twin problems of duplicate registration and registration being lost when moving house. There should be a consideration of whether National Insurance numbers could be used for this purpose.**

### **Using outreach more effectively**

68. We have been presented with evidence of under registered groups where outreach could be promoted further, to encourage them to register.

69. The Joseph Rowntree Reform Trust suggested that community touchpoints, such as local community centres, or religious institutions, can help in promoting registration.<sup>79</sup> Some witnesses have also suggested using educational establishments. This includes, for example, through PSHE lessons; or, incorporating registration during university enrolment, to promote young people’s sense of civic duty and develop knowledge about voter registration.<sup>80</sup> When we were in Canada we found out that some schools help attainers

75 Department for Levelling Up, Housing and Communities ([ELR0005](#))

76 Department for Levelling Up, Housing and Communities ([ELR0005](#))

77 Department for Levelling Up, Housing and Communities ([ELR0005](#))

78 [Qq237–8](#) [Simon Hoare MP, Parliamentary Under-Secretary of State (Local Government), Department for Levelling Up, Housing and Communities]

79 [Q139](#) [Fiona Weir, CEO Joseph Rowntree Reform Trust]

80 [Q135](#) [Sila Ugurlu, Trustee, British Youth Council]; Dr Andrew Mycock (Reader In Politics at University of Huddersfield); Dr Thomas Loughran (Lecturer in Politics at University of Lancaster) ([ELR0002](#))

to register in advance of reaching 18 and some Canadian provinces are undertaking mandatory lessons in schools to encourage young people to register (education policy in Canada is under provincial jurisdiction).

70. We also learnt on our visit to Canada that rather than using resources on an annual canvass, electoral registration officers undertake ‘targeted revision’ in high mobility areas to check people were registered, by visiting new residential developments or homes of elderly people, for example.

71. Additionally, when preparing for elections, returning officers in each electoral district hire community relations officers to engage with the community and help explain how the voting process works, giving people the information they need to participate. These community relations officers include staff who speak official minority languages, some who work in urban areas with the homeless, and some who engage with elderly voters.

72. Disability Rights UK suggested more could be done in residential homes, long-term care treatment facilities or supported housing, to ensure people are not shut out of the electoral process and are equipped with the in-person support to be able to vote. Disability Rights UK told us that automatic voter registration alone did not offer the whole solution for “how to make the 14 million disabled people part of society ... [and] ... be a voter”.<sup>81</sup>

**73. *The Government should introduce measures to support educational establishments including schools to better educate young people about the importance of voting and to encourage them to register to vote, as is the case in Canada.***

**74. *Electoral Registration Officers should also assist adult social care providers to ensure that people in receipt of care are still on the electoral register and to help them to access postal or proxy votes so that they can continue to play their part as active citizens.***

---

81 [Q145](#) [Fazilet Hadi, Director of Policy, Disability Rights UK]

## 3 Further changes to the electoral process: the Elections Act 2022

75. This chapter of the report examines the remaining changes to the electoral process consequent upon the passing of the Elections Act 2022. These include: the extension of the requirement for photo ID to vote in general elections in England and Wales; changes to absent voting; and extending the right to vote of overseas voters and EU citizens. The following sections explore the implementation of photo ID and look forward to the implementation of the rest of the Act and its implications for the electoral system and the staff who administer it.

### Implementing Voter ID

#### *May local elections 2023*

76. At the local elections in May 2023, for the first time at an election in England, voters were required to present photo ID to vote in person. If people did not have an acceptable form of ID such as a driving licence or passport, they could apply to their local authority for a voter authority certificate (VAC).<sup>82</sup>

77. The Electoral Commission's report into the polls found that 14,000 people were recorded at polling stations as unable to vote due to this new requirement, although the actual number of people who could not vote is estimated to be much higher: the Commission's survey found that 4% of people did not vote due to the requirement, which it calculated to be around 740,000 people. The Commission's letter to us concluded that "the voter ID requirement posed a barrier to some voters and is likely to have a larger impact at higher turnout polls", calling for urgent action ahead of a future general election.<sup>83</sup> The Electoral Commission also found that voter ID impacted certain groups more than others; for example, disabled or unemployed voters were more likely to struggle with the new ID requirement.<sup>84</sup>

78. Other bodies have also raised concerns about the potential for this new requirement to disenfranchise certain groups of voters - for example, the All Party Parliamentary Group on Democracy and the Constitution concluded in its report in September 2023 that "[t]he current voter-ID system is, as it stands, a 'poisoned cure' in that it disenfranchises more electors than it protects to the extent that it could affect electoral outcomes."<sup>85</sup>

#### *Electoral Commission's recommendations on voter ID post May elections*

79. In its May 2023 report, the Electoral Commission made several recommendations to the Government, such as reviewing the forms of acceptable ID, and considering allowing attestation (a process of vouching for a person's identity at a polling station) for voters who cannot access a form of accepted ID.<sup>86</sup>

82 Gov.uk, [Apply for photo ID to vote \(called a 'Voter Authority Certificate'\)](#)

83 Correspondence from the Electoral Commission, [15 September 2023](#)

84 Electoral Commission, [Report on the May 2023 local elections in England](#), September 2023

85 All Party Parliamentary Group on Democracy and the Constitution, [Voter ID - What went wrong and how to fix it](#), September 2023

86 Electoral Commission, [Report on the May 2023 local elections in England](#), September 2023

80. The Electoral Commission's report also found that awareness and take-up of VACs was low.<sup>87</sup> Only 89,500 applications were made for VACs and only 25,000 certificates were actually used on polling day.<sup>88</sup> The Commission recommended that the deadline for VAC applications could be moved closer to polling day, to extend its availability for voters who do not have any other form of accepted ID.

### ***Government response to Electoral Commission's recommendations***

81. In response to an Urgent Question on 14 September 2023, Rachel Maclean MP (the then Minister of State, DLUHC) called the Commission's recommendations "sensible and practical". She also commented that "when we try to expand the forms of identification that can be used, we are going to say yes in some instances and no in others".<sup>89</sup>

82. However, in November 2023, when the Government responded in full to the Electoral Commission's report, it rejected increasing the number of forms of ID that could be used stating that "the Government has been unable to identify any additions [of ID] that would succeed in significantly increasing coverage, in the groups identified and more generally."<sup>90</sup>

83. This argument was challenged by the House of Lords Constitutional Affairs Committee. When questioned about whether any rigorous survey had been done to support the Government's claim that 96% of the holders of any potential additional document will have one already that is on the list, Becca Crosier, Deputy Director for Elections at the Department for Levelling Up, Housing and Communities, conceded that "[a]t the minute, we do not have the positive evidence" calling it "an interesting area for further research in the next iteration of the evaluation."<sup>91</sup> However, she argued that in the absence of evidence that adding additional forms of ID would make a significant change to the number of people able to vote "our decision has been not to add them, because of the complication it would add to the list."<sup>92</sup>

84. The Government also rejected moving the deadline for VAC applications any closer to polling day.<sup>93</sup> In his evidence to the House of Lords, Minister Hoare said of the six day deadline:

I will not say that six working days before polling is generous, because that is not the right word, but it is a pretty sensible deadline.<sup>94</sup>

85. Becca Crosier argued that if the deadline were moved closer to election day:

we would still be giving electoral administrators only one working day to turn the applications around. As the Minister rightly says, that is a big burden to put on them very close to polling day when they are frantically busy.<sup>95</sup>

---

87 Electoral Commission, [Report on the May 2023 local elections in England](#), September 2023

88 Electoral Commission, [Report on the May 2023 local elections in England](#), September 2023

89 HC Deb, Thursday 14 September 2023, [col 1007](#) [Commons Chamber]

90 Department for Levelling Up, Housing & Communities, [Government response to Electoral Commission report on May elections](#), 30 November 2023

91 House of Lords Constitution Committee, [Voter ID](#), 6 December 2023, Q85

92 House of Lords Constitution Committee, [Voter ID](#), 6 December 2023, Q86

93 Department for Levelling Up, Housing & Communities, [Government response to Electoral Commission report on May elections](#), 30 November 2023

94 House of Lords Constitution Committee, [Voter ID](#), 6 December 2023, Q78

95 House of Lords Constitution Committee, [Voter ID](#), 6 December 2023, Q83

86. In his evidence to the House of Lords, Minister Hoare stated that the Government did not support attestation as it could “undermine the aim of the identification policy to prevent impersonation”.<sup>96</sup> He also said it would require “a process for confirming the identity of the vouched-for voter after the close of poll” which “would be extremely costly, undoubtedly inefficient and could potentially cause, dependent on the numbers, significant delays to the result of the poll being announced, open it up to challenge and further diminish confidence in the electoral system and its results as a whole”.<sup>97</sup>

87. However, Minister Hoare did acknowledge the need to broaden awareness of voter ID among certain demographics, such as the old and digitally excluded, some ethnic minorities and young voters, and pledged to “turbo charge awareness” of acceptable forms of IDs and VACs.<sup>98</sup> He suggested that the Government might consider using advertising through organisations like the DWP, HM Passport Office and doctors’ surgeries to raise awareness.<sup>99</sup>

88. The Minister told us what his summary was of how the recent changes had affected the May 2023 elections:

For those who predicted that the sky would fall on their heads in May of this year, it did not. It was right to use a local election, not taking place across the whole country, and as always with an expected lower turnout. That allowed EROs and others to assist in those elections so that they were learning best practice in those areas that were not having elections. It has also helped us to work out where additional effort and resource needs to be targeted to help people to understand what it is.

I think we have a wide and deep list of those forms of ID that are acceptable and I think that strikes the balance between inclusion and the operational ability of the polling booths. I don’t think there was enough effort put into the existence of the certificate and the ease of securing a certificate and the fact that it is as legitimate as a passport or driving licence or any other form of accepted ID, so there is some work to do there.<sup>100</sup>

89. On our visit to Canada, we were told that Voter ID had been used there since 2007, with a wide range of acceptable ID and flexibility in how a person can confirm their identity. Box 2 below sets out the detail of this.

---

96 House of Lords Constitution Committee, [Voter ID](#), 6 December 2023, Q88

97 House of Lords Constitution Committee, [Voter ID](#), 6 December 2023, Q88

98 House of Lords Constitution Committee, [Voter ID](#), 6 December 2023, Q73

99 House of Lords Constitution Committee, [Voter ID](#), 6 December 2023, Q73

100 [Q268](#) [Simon Hoare MP, Parliamentary Under-Secretary of State (Local Government), Department for Levelling Up, Housing and Communities]

**Box 2: Voter ID in Canada**

If voters do not have the accepted forms of ID, voters can declare their identity and address in writing and be vouched for by another elector who knows them and is assigned to vote at the same polling station. The voucher must provide their identity and address and can only vouch for one person.

The Chief Electoral Officer of Elections Canada explained to us that he had the discretion to decide what constitutes appropriate ID. For example, more recently he had added prescription pill bottles, and a letter of confirmation from a resident in a first nations reserve, a homeless shelter or nursing home, as acceptable ID in order to make it easier for those less likely to have official documents for ID. Elections Canada are also in the process of requesting that voters in long-term care facilities should be able to vote without proving their identity, as many residents will not have a driving licence or other forms of ID, and it was felt that preparing a list of attestation is an unnecessary burden for facility administrators.

Source: Committee Visit

90. **While it is reassuring that the Electoral Commission’s analysis of the UK local elections in May 2023 found that only a small number of people had been turned away due to lack of photo ID, we note that not all of those who wished to vote in person and were turned away, could have been recorded by staff. The Commission estimated that approximately 740,000 people did not vote due to the new requirement. The number turned away at the next general election might well be higher because of the higher turnout at general elections and also because the makeup of voters at a general election is different to that of local elections.**

91. *The Electoral Commission should ensure that it carries out a proper assessment of the impact of the voter ID requirement before the next general election, including a review of data collected locally.*

92. **The Commission, however, identified a negative impact on specific groups of voters. We are accordingly concerned about the effect of voter ID on potentially reducing turnout at the next UK general election from these groups. We recommend that the government work with these specific groups, such as disabled voters and those with learning disabilities, about the voter ID requirement ahead of the next general election.**

93. *We disagree with the Government’s view of the adequacy of the list of accepted photo ID and believe that it should be widened to include other forms, such as police warrant cards, emergency services passes and non-London travel passes. This is the case in Canada and has not proved a problem there.*

94. *Central and local government and the Electoral Commission need to work together to raise awareness of the need for Voter Authority Certificates prior to the next general election, to ensure that those who do not have ID are not shut out of the electoral process.*

## Implementing the other provisions of the Act

### *Concerns about the collective challenge of implementing the Act in time*

95. On 3 July 2023, several stakeholders, including the Electoral Commission and AEA, told us that the upcoming changes arising from the Elections Act 2022 (absent voting, and eligibility to vote for overseas voters and EU citizens) are collectively a bigger challenge to implement than voter ID.<sup>101</sup> John Pullinger, Chair of the Commission, stressed the need for timely secondary legislation, and the detailed guidance arising from it to be able to deliver the changes successfully:

We really do need to be quite strong in maintaining enough time to train people and make sure we have a consistent approach across all parts of the UK in implementing whatever changes are coming forward. We need to be quite tough on that ... There needs to be not just secondary legislation coming out but the guidance coming out and everything being ready, so that local authorities can plan with confidence. It is uncertainty that is the real enemy of this.<sup>102</sup>

96. Both the Commission and the AEA agreed that the Gould principle (that electoral law should not be changed within six months of an election that the change would impact)<sup>103</sup> needs to apply for the remaining changes. This would mean delivering secondary legislation (“knowing what you need to do”) a minimum of six months in advance of an electoral event.<sup>104</sup> Secondary legislation for voter ID was provided only four months prior to the local elections.<sup>105</sup>

97. Stakeholders, such as the AEA, have suggested that the pressures of event-led registration are exacerbated by the changes in the Elections Act 2022.<sup>106</sup> The increasing trend of ‘event-led’ registration puts considerable pressure on electoral registration officers as deadlines fast approach. Peter Stanyon, Chief Executive of the AEA, told us that:

The Government have responsibility to make sure that the systems are smooth, efficient and accurate coming into local authorities, and then it becomes the responsibility of the local authorities to assist returning officers as best they can in making resource available in that period.

98. Speaking about her experience of the local elections in May 2023, one returning officer, Miranda Cannon, explained the cumulative effect of the changes, such as voter ID, alongside application deadlines:

It is about the impact close to any poll, and particularly larger general elections. We already see that surge in registrations and in demand for postal votes. If you have more checking and more processes to do at a time

---

101 [Q177](#), [Q182](#) [Peter Stanyon, Chief Executive, Association of Electoral Administrators; Graham Farrant]; [Q195](#) [John Pullinger CB, Chair, Electoral Commission]

102 [Q228](#) [John Pullinger CB, Chair, Electoral Commission]

103 Gov.uk, [Taking forward the Gould report](#), June 2008

104 [Q184](#) [Peter Stanyon, Chief Executive, Association of Electoral Administrators; Graham Farrant]; [Q227](#) [John Pullinger CB, Chair, Electoral Commission]

105 [Q274](#) [Liz Owen, Deputy Director for Registration and Franchise, Department for Levelling Up, Housing and Communities]

106 Association of Electoral Administrators ([ELR0009](#))

when you are preparing for what is a major event, it is a huge burden at a time when a lot of electoral services teams are already under the cosh—and they are not big teams.<sup>107</sup>

99. We welcome the government’s decision to take the provisions of the Elections Act 2022 forward in phases. However, we are concerned as to how these will be fully implemented by the next election. The remaining provisions are more complex to introduce than voter ID, exacerbating the pressures of election time because of applications for Voter Authority Certificates, overseas applications, and the reapplication of postal votes. This increases the risk of something major going wrong at a national election, including large numbers of people being turned away or voters not put on the registers in time to vote which would impact the current high level of confidence in the electoral system.

100. *The Government must do its best to observe the Gould principle and where possible apply it to the timetable for implementing the remaining changes stemming from the Elections Act 2022.*

101. *We note with concern that the Association of Election Administrators has said that there is still insufficient practical detail to prepare for these changes. Secondary legislation needs to be brought forward immediately to ensure that Electoral Registration Officers can plan ahead and reduce the risk of people not being able to vote.*

### **Change to overseas voter eligibility**

102. The fifteen-year limit on voting rights for British citizens living overseas will be removed under the Elections Act 2022, giving any British citizen that has previously lived in or been registered to vote in the UK the right to vote at UK Parliamentary elections.<sup>108</sup> The Government’s impact assessment estimated that between 3.2 and 3.4 million additional people could be eligible to register to vote.<sup>109</sup>

103. On 6 March 2023, academics told us that “the big stand out among the rest [of the changes] is the potential work that the overseas voters’ aspect of the Bill might add”, suggesting it was “a much bigger problem than [...] is recognised”.<sup>110</sup> Amanda Edwards, returning officer in Wales, explained to us that, due to having seen no further detail or secondary legislation on this matter, the level of impact on their offices was unknown.<sup>111</sup> The Electoral Commission agreed, telling us: “with overseas voters, the scale of it and the nature of the problem is going to be unknown until we are in it.”<sup>112</sup>

104. Registering an overseas elector is a longer process for administrators than an ordinary application. The AEA have pointed out that it means historic electoral registers will have to be retained indefinitely.<sup>113</sup> Academics drew attention to the potentially millions

107 [Q169](#) [Miranda Cannon, Returning Officer, Leicester City Council]

108 Cabinet Office, [Elections Bill Impact Ass, 2021–22](#)

109 Cabinet Office, [Elections Bill Impact Ass, 2021–22](#) p47

110 [Q4](#) [Professor Toby James, Professor of Politics and Public Policy and Co-Director of Electoral Integrity, Project, University of East Anglia]; [Professor Alistair Clark, Professor of Political Science, Newcastle University]

111 [Q124](#) [Amanda Edwards, Chair of AEA Wales Branch and Elections Manager at Carmarthenshire County Council]

112 [Q230](#) [John Pullinger CB, Chair, Electoral Commission]

113 Association of Electoral Administrators ([ELR0009](#))

of additional applications that electoral officials will have to verify against hard-to-find resources. They suggested that the availability of these resources and their accuracy will depend “on the quality of local government record-keeping of more than 15 years ago”.<sup>114</sup>

### *Impact of the changes on electoral registration officers*

105. We heard evidence which said that the Elections Act 2022 changes “have the potential to stretch the experts in terms of some of the back-office procedures”, and which labelled the upcoming changes “a hugely testing period”.<sup>115</sup> The Chair of the Electoral Commission told us that implementing the remaining changes “is going to be a massive challenge”.<sup>116</sup>

106. Some witnesses explained that the new changes are likely to exacerbate pressure on EROs around election time, due to the increasing trend of event-led registration. The AEA told us:

If all of the parts of the Elections Act are rolled out in time for the next general election, we are moving into an area where you have minus 12 [days] and minus 11 [days] away from the action. You will have the registration to vote, where we know already that there are spikes in registrations. Online absent voting will inevitably create spikes just before the election. As people engage with voter authority certificates, there will be that spike as it gets closer, six days out from the election. It does fill me with a degree of trepidation.<sup>117</sup>

107. The Chair of the Electoral Commission highlighted the fact that the new changes were going to exacerbate pressures on electoral staff who were already over-stretched and under pressure: “All of the changes we are talking about are adding complexity to a system that is vastly overcomplicated already”.<sup>118</sup> One returning officer told us that the various layers of change “just increases that risk of something going wrong that is material and that materially affects the result of an election”.<sup>119</sup>

108. Returning officers reported that due to the introduction of voter ID many electoral services staff left their roles prior to the local elections of May 2023 because of the extra work involved in checking photo ID and their discomfort with the policy. Miranda Cannon, returning officer for Leicestershire City Council, reported that staff dropped out as they got closer to the local elections, saying they “felt a little bit concerned and uneasy about the additional work that was involved”.<sup>120</sup> Another returning officer told us she had to borrow staff from a neighbouring council. The Government committed itself to funding an additional member of staff at every single polling station for the local elections, but returning officers told us that they had struggled to obtain enough staff to operate polling stations and check ID. One returning officer, Graham Farrant, told us:

When it comes to a general election, we will struggle. We will have to change the terms and conditions [of staff]. We are looking at our offer to people

114 [Q4](#) [Professor Toby James, Professor of Politics and Public Policy and Co-Director of Electoral Integrity, Project, University of East Anglia]; [Professor Alistair Clark, Professor of Political Science, Newcastle University]

115 [Q182](#) [Peter Stanyon, Chief Executive, Association of Electoral Administrators]

116 [Q229](#) [John Pullinger CB, Chair, Electoral Commission]

117 [Q177](#) [Peter Stanyon, Chief Executive, Association of Electoral Administrators]

118 [Q231](#) [John Pullinger CB, Chair, Electoral Commission]

119 [Q183](#) [Graham Farrant, Chief Executive and Returning Officer, Bournemouth, Christchurch and Poole Council]

120 [Q175](#) [Miranda Cannon, Returning Officer, Leicester City Council]

who work in the polling stations, and we might have to improve that, which will be a cost to the council. I do not think that has been thought about or taken into account anywhere in the calculations that I have seen.<sup>121</sup>

109. The Association of Electoral Administrators (AEA) has expressed long-standing concerns about electoral staff recruitment. Peter Stanyon, its Chief Executive, told us: “we have advertised more electoral services and electoral services managers’ jobs since May than I can recall in my time at the association”. He also explained that adopting changes from the Elections Act 2022 “is adding another layer to that concern as we go forward”.<sup>122</sup>

110. Louise Round from the Society of Local Authority Chief Executives (SOLACE) suggested that wider staff in local authorities could be better deployed to support electoral registration:

All the time our staff are out talking to communities about all sorts of different things, covid and everything else, so why not use them as your workforce, why not use them to talk to people about elections and registration?<sup>123</sup>

111. There is also a concern about the consequence of recruitment issues on the level of technical expertise in the sector. The AEA stated in July 2023 that there remains a “worry” about the shortage of experienced staff for the next general election, particularly when back-up staff cannot be borrowed from other authorities.<sup>124</sup> Graham Farrant, returning officer for Bournemouth, Christchurch and Poole Council, explained that due to the complexity of the requirements, the overall expertise of staff decreases:

The danger with these requirements is that we are requiring more people to be involved, and they have less expertise, so the risk of something going wrong gets marginally greater every time you add another layer of complexity. When you add a layer of complexity with the speed with which we are doing it now, you make it more and more likely that something will go wrong.<sup>125</sup>

### ***The Government’s view of the upcoming changes under the Elections Act 2022***

112. At a House of Lords Constitutional Affairs Committee evidence session on voter ID, Minister Hoare confirmed that the new requirements would create new burdens for local authorities, saying: “any change to a system, particularly one that had been in practice for a considerable period of time, was going to create challenges, burdens and new tests, et cetera, for those who were delivering those elections.”<sup>126</sup> He noted that “councils have been made aware on repeated occasions of the new burdens fund.” Becca Crosier told the Lords Committee:

121 [Q174](#) [Graham Farrant, Chief Executive and Returning Officer, Bournemouth, Christchurch and Poole Council]

122 [Q174](#) [Peter Stanyon, Chief Executive, Association of Electoral Administrators]

123 [Q64](#) [Louise Round, Head of Elections and Democracy, Solace]

124 [Q183](#) [Peter Stanyon, Chief Executive, Association of Electoral Administrators]

125 [Q178](#) [Graham Farrant, Chief Executive and Returning Officer, Bournemouth, Christchurch and Poole Council]

126 House of Lords Constitution Committee, [Voter ID](#), 6 December 2023, Q71

There are a few routes to funding this one. We have so far disbursed £25 million of new burdens funding to local authorities. That covers the whole of what we have implemented under the Elections Act so far. Just under £14 million of it is for voter ID specifically, so that is their funding at the moment. There is also a facility for local authorities to make a justification-led bid for additional funding if they can show that the need was greater than the amount we supplied them with. We are working on very new policy. We have had to make a number of assumptions, for example, about demand for voter authority certificates. We wanted a contingency in case we were wrong. Those justification-led bids are also available.<sup>127</sup>

She noted that the Government had also provided £7.4 million of funding for local authorities separate from the new burdens funding to support additional communications efforts around Voter ID.<sup>128</sup>

**113. We are particularly concerned about the increased cost to local authorities and the unknown impact of work required for the overseas electors change resulting from the Elections Act 2022. There is a clear anxiety amongst returning officers about the availability and experience of polling station and electoral staff because of retention and recruitment problems and the loss of technical expertise.**

**114. *The Department for Levelling Up, Housing and Communities must carry out a new burdens assessment of local authorities due to the increasing responsibilities and work arising from the Elections Act 2022. Should this assessment indicate a need for additional funding for implementing the remaining provisions of this Act, this funding should be provided as a matter of urgency.***

---

127 House of Lords Constitution Committee, [Voter ID](#), 6 December 2023, Q79

128 House of Lords Constitution Committee, [Voter ID](#), 6 December 2023, Q79

## 4 The need for the consolidation of election law

115. This chapter of the report sets out the evidence we heard about other problems with electoral law: its volume, complexity and fragmentation. Electoral law in the UK is spread across numerous statutes and a significant number of regulations.<sup>129</sup> Legislation is difficult to access, apply, and update, causing unnecessary additional work for the Electoral Commission and those who administer and run elections.<sup>130</sup>

### The volume and complexity of electoral legislation

116. We were told that the volume and complexity of electoral law is a problem, increasing cost and preventing improvement in the administration of elections, including the registers.<sup>131</sup> The Electoral Commission said that “the fundamental problem is that we have yet to consolidate electoral law on to a platform that makes sense. It is really hard for administrators and parties to understand what the rules are by which they need to operate”.<sup>132</sup> The Electoral Commission’s website states:

There are currently over 100 pieces of electoral legislation. Every type of election has its own legislation. We have to write hundreds of pages of guidance to explain the rules to candidates, political parties, electoral administrators, and voters. People who run elections may have to refer to multiple documents to make sure they’re following the law. This is costly and time consuming. Electoral law doesn’t allow many simple processes to be done online, despite this being what people expect.<sup>133</sup>

117. The Law Commission stated in its 2020 report on Electoral Law:

Electoral law [...] has become increasingly complex and fragmented; it is difficult to access, apply, and update. Much of the law is rooted in 19th Century language and practice, and doesn’t reflect modern electoral administration.<sup>134</sup>

118. The Association of Electoral Administrators (AEA) 2021 report argued that “an ever-increasing collection of Acts and secondary legislation too often works against its effective delivery. Elections are often delivered in spite of rather than because of the fragmented and outdated legislative framework.”<sup>135</sup> The Local Government Information Unit’s survey found that 78% of electoral administrators considered the complexity of electoral law a problem.<sup>136</sup> The [Elections Act 2022](#) and its associated secondary legislation have since substantially increased the size of the UK’s body of electoral law.

129 Law Commission, [Electoral Law Project](#), March 2020

130 [Q231](#) [John Pullinger CB, Chair, Electoral Commission]

131 Local Government Information Unit ([ELR0011](#))

132 [Q231](#) [John Pullinger CB, Chair, Electoral Commission]

133 Electoral Commission, [Reforming electoral law](#), January 2024

134 Law Commission, [Electoral Law Project](#), March 2020

135 AEA, [Blueprint for a Modern Electoral Landscape](#), July 2021

136 Local Government Information Unit ([ELR0011](#))

## Previous recommendations on rationalising electoral law

119. The House of Lords Constitution Committee recommended that consolidation of election law should be completed before the next general election.<sup>137</sup> In March 2020, the Law Commission recommended rationalising existing law into a single, consistent legislative framework.<sup>138</sup>

120. In May 2020, the Public Administration and Constitutional Affairs Committee (PACAC) raised the urgent need for review and consolidation of electoral law.<sup>139</sup> After the Elections Act 2022 was passed, PACAC wrote to the Secretary of State for Levelling Up, Communities and Local Government, pointing out that “the Elections Bill was a missed opportunity to carry out urgent consolidation and reform of the UK’s body of electoral law, which is voluminous and fragmented across a raft of primary legislation and accompanying secondary legislation”.<sup>140</sup> That Committee went on to say: “this consolidation and simplification of electoral law is both necessary and urgent and until it is carried out there is a not insignificant risk of something unforeseen taking place with a UK election, damaging our democracy.”<sup>141</sup>

121. In June 2023, the AEA urged the Government to create “a single Electoral Administration Act to modernise core processes while reflecting the divergent approach of all four UK nations”.<sup>142</sup> It suggested that “a new Act should consider the practicalities of administering elections in the twenty-first century and design a timetable around the needs of electors, candidates, ROs and electoral administrators”.<sup>143</sup>

**122. The Government urgently needs to update, consolidate and simplify electoral law for the 21st century, as recommended by a range of parliamentary and other stakeholders. Until this is done, electoral processes and administration are more costly, burdensome and inefficient than they should be, and the democratic process is at risk.**

***123. We reiterate the strong recommendation of numerous committees in recent years, including the House of Commons Public Administration and Constitutional Affairs Committee and the House of Lords Constitution Committee, that the Government bring forward a timeline to consolidate electoral law. The Government must now prioritise the time and resources needed to create critical improvements to electoral legislation.***

---

137 Public Administration and Constitutional Affairs Committee, [Letter to Secretary of State 12 April 2022](#)

138 Law Commission, [Electoral Law: A Final Report](#), 16 March 2020

139 Public Administration and Constitutional Affairs Committee, First Special Report of Session 2019–21 [Electoral law: The Urgent Need for Review](#), HC 327

140 Public Administration and Constitutional Affairs Committee, [Letter to Secretary of State, 12 April 2022](#)

141 Public Administration and Constitutional Affairs Committee, [Letter to Secretary of State, 12 April 2022](#)

142 [AEA, Post Polls Report, 27 June 2023](#)

143 [AEA, Post Polls Report, 27 June 2023](#)

# Conclusion and recommendations

---

## The case for reform

1. The Government told us that the current system of individual electoral registration strikes the right balance of accessibility, accuracy and individual freedom of choice. The evidence we received does not back this statement up - in fact, it suggests the opposite, with potentially as many as eight million people not correctly registered at their current address, the UK ranking 58th out of 169 countries on the Electoral Integrity Project as well as the Electoral Commission itself describing the current system as “neither effective nor efficient” and asking for its “urgent reform”. (Paragraph 26)
2. Rates of electoral registration are significantly lower amongst some groups in the UK, such as the young, those who move house frequently and private renters, implying some level of marginalisation and exclusion. Tackling under-registration among hard-to-reach groups will need to involve a variety of methods and approaches. (Paragraph 32)
3. We consider it is important for local authorities and EROs to understand the communication and access needs in order to ensure that people with disabilities are not shut out of the electoral process. We find it totally unacceptable that local authorities are contacting people with disabilities without taking into account their communication needs. *The Electoral Commission should undertake further research to identify effective ways to make registration easier and more accessible for people with disabilities.* (Paragraph 33)
4. There are material barriers for individuals registering to vote, including a lack of knowledge of the process and misunderstandings about the use of their data. While we accept that a proportion of those missing from the register will include individuals who do not wish to vote at all, we find it a matter of deep concern that there are increasing numbers of individuals not registered to vote; for example, completeness for attainers has dropped markedly from 45% in 2015 to 16% in 2022. (Paragraph 38)
5. *The Electoral Commission should, with local authorities and academics, undertake more research on effective ways to encourage people who do not vote, and make recommendations to central and local government as to how people can be encouraged to take part in the democratic process. Elections promote civic engagement and participation. Being registered empowers individuals to actively engage in shaping governance.* (Paragraph 39)
6. *The availability of the open register raises concerns about hostile actors attempting to distort our democracy. However, we recognise that credit checking agencies utilise the register to confirm the address of individuals. Without such access individuals may be denied credit or other services. We therefore recommend a review on which types of companies can purchase the open register with an individual’s consent.* (Paragraph 43)

## Solutions to improving the registration system

7. *Public bodies such as DVLA or HM Passport Office should prompt individuals to register or update their details on the electoral register when they are using public services, such as driving licence applications or passport renewals. In addition, we recommend that signposting voter registration when national insurance numbers are issued to citizens who reach sixteen years of age would be a way of ensuring that more young people are entered on the electoral register. We expect the DWP, DVLA and HM Passport Office to write to us within three months of this Report being published to set out their plan for implementing these recommendations. (Paragraph 48)*
8. *Citizens in the UK already supply the government with information necessary for voter registration when they apply for a passport or driving licence (for example citizens' information is held in various government databases). This information could and should provide the basis for an entry on the electoral register which could then be taken forward by EROs. We also support the Electoral Commission's aims of improving the accuracy and completeness of the registers. (Paragraph 56)*
9. *We therefore recommend that legislation be brought forward by the Government to enable the sharing of data held by DVLA, DWP, and HM Passport Office with EROs and to enable EROs to use that data fully. A review should be held to consider if the registration with DVLA, HM Passport Office and DWP should require electoral registration. This review should take into account those with transient lifestyles and the speed and effectiveness of the electoral registration process. (Paragraph 57)*
10. *We acknowledge the Government's concerns about automatic registration, but we do not believe they are insurmountable because other countries of the world have managed to overcome them. We therefore recommend that the Government adopt a strategy to move towards an opt in automated voter registration system over the next few years, while monitoring the pilot in Wales. The Electoral Commission should write to us in 4 weeks with a detailed plan including milestones and dates for moving towards implementing automated voter registration with a clear outline of how people can protect their data privacy. (Paragraph 66)*
11. *In the meantime, the Electoral Commission should research the possibility of moving to single unique identifiers for citizens registered to vote as a first step towards a single national register for England and to address the twin problems of duplicate registration and registration being lost when moving house. There should be a consideration of whether National Insurance numbers could be used for this purpose. (Paragraph 67)*
12. *The Government should introduce measures to support educational establishments including schools to better educate young people about the importance of voting and to encourage them to register to vote, as is the case in Canada. (Paragraph 73)*
13. *Electoral Registration Officers should also assist adult social care providers to ensure that people in receipt of care are still on the electoral register and to help them to access postal or proxy votes so that they can continue to play their part as active citizens. (Paragraph 74)*

## Further changes to the electoral process: the Elections Act 2022

14. While it is reassuring that the Electoral Commission's analysis of the UK local elections in May 2023 found that only a small number of people had been turned away due to lack of photo ID, we note that not all of those who wished to vote in person and were turned away, could have been recorded by staff. The Commission estimated that approximately 740,000 people did not vote due to the new requirement. The number turned away at the next general election might well be higher because of the higher turnout at general elections and also because the makeup of voters at a general election is different to that of local elections. (Paragraph 90)
15. *The Electoral Commission should ensure that it carries out a proper assessment of the impact of the voter ID requirement before the next general election, including a review of data collected locally.* (Paragraph 91)
16. The Commission, however, identified a negative impact on specific groups of voters. We are accordingly concerned about the effect of voter ID on potentially reducing turnout at the next UK general election from these groups. *We recommend that the government work with these specific groups, such as disabled voters and those with learning disabilities, about the voter ID requirement ahead of the next general election.* (Paragraph 92)
17. *We disagree with the Government's view of the adequacy of the list of accepted photo ID and believe that it should be widened to include other forms, such as police warrant cards, emergency services passes and non-London travel passes. This is the case in Canada and has not proved a problem there.* (Paragraph 93)
18. *Central and local government and the Electoral Commission need to work together to raise awareness of the need for Voter Authority Certificates prior to the next general election, to ensure that those who do not have ID are not shut out of the electoral process.* (Paragraph 94)
19. We welcome the government's decision to take the provisions of the Elections Act 2022 forward in phases. However, we are concerned as to how these will be fully implemented by the next election. The remaining provisions are more complex to introduce than voter ID, exacerbating the pressures of election time because of applications for Voter Authority Certificates, overseas applications, and the reapplication of postal votes. This increases the risk of something major going wrong at a national election, including large numbers of people being turned away or voters not put on the registers in time to vote which would impact the current high level of confidence in the electoral system. (Paragraph 99)
20. *The Government must do its best to observe the Gould principle and where possible apply it to the timetable for implementing the remaining changes stemming from the Elections Act 2022.* (Paragraph 100)
21. *We note with concern that the Association of Election Administrators has said that there is still insufficient practical detail to prepare for these changes. Secondary legislation needs to be brought forward immediately to ensure that Electoral Registration Officers can plan ahead and reduce the risk of people not being able to vote.* (Paragraph 101)

22. We are particularly concerned about the increased cost to local authorities and the unknown impact of work required for the overseas electors change resulting from the Elections Act 2022. There is a clear anxiety amongst returning officers about the availability and experience of polling station and electoral staff because of retention and recruitment problems and the loss of technical expertise. (Paragraph 113)
23. *The Department for Levelling Up, Housing and Communities must carry out a new burdens assessment of local authorities due to the increasing responsibilities and work arising from the Elections Act 2022. Should this assessment indicate a need for additional funding for implementing the remaining provisions of this Act, this funding should be provided as a matter of urgency.* (Paragraph 114)

### The need for the consolidation of election law

24. The Government urgently needs to update, consolidate and simplify electoral law for the 21st century, as recommended by a range of parliamentary and other stakeholders. Until this is done, electoral processes and administration are more costly, burdensome and inefficient than they should be, and the democratic process is at risk. (Paragraph 122)
25. *We reiterate the strong recommendation of numerous committees in recent years, including the House of Commons Public Administration and Constitutional Affairs Committee and the House of Lords Constitution Committee, that the Government bring forward a timeline to consolidate electoral law. The Government must now prioritise the time and resources needed to create critical improvements to electoral legislation.* (Paragraph 123)

# Formal minutes

---

**Monday 11 March 2024**

## **Members present**

Mr Clive Betts, in the Chair

Bob Blackman

Mrs Natalie Elphicke

Kate Hollern

Andrew Lewer

## **Electoral Registration**

Draft report (*Electoral Registration*) proposed by the Chair, brought up and read.

*Ordered*, That the report be read a second time, paragraph by paragraph.

Paragraphs 1 to 123 read and agreed to.

Summary agreed to.

*Resolved*, That the Report be the Fourth Report of the Committee to the House.

*Ordered*, That the Chair make the Report to the House.

*Ordered*, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

## **Adjournment**

Adjourned till Monday 18 March at 3.30pm

## Witnesses

---

The following witnesses gave evidence. Transcripts can be viewed on the [inquiry publications page](#) of the Committee's website.

### Monday 6 March 2023

**Professor Toby James**, Professor of Politics and Public Policy and Co-Director of Electoral Integrity, Project, University of East Anglia; and **Professor Alistair Clark**, Professor of Political Science, Newcastle University [Q1–33](#)

**Louise Round**, Head of Elections and Democracy, Solace; and **Barry Quirk CBE**, formerly Chief Executive, Kensington and Chelsea London Borough Council [Q34–66](#)

### Monday 17 April 2023

**Peter Stanyon**, Chief Executive, Association of Electoral Administrators; **Pete Wildman**, Vice President, Scottish Assessors Association; and **Amanda Edwards**, Chair of AEA Wales Branch and Elections Manager at Carmarthenshire County Council [Q67–130](#)

**Fazilet Hadi**, Director of Policy, Disability Rights UK; Sila Ugurlu, Trustee, British Youth Council; and **Fiona Weir**, CEO Joseph Rowntree Reform Trust [Q131–154](#)

### Monday 3 July 2023

**Peter Stanyon**, Chief Executive, Association of Electoral Administrators; **Graham Farrant**, Chief Executive and Returning Officer, Bournemouth, Christchurch and Poole Council; **Miranda Cannon**, Returning Officer, Leicester City Council [Q155–186](#)

**John Pullinger CB**, Chair, Electoral Commission; **Ailsa Irvine**, Director of Electoral Administration and Guidance, Electoral Commission; **Craig Westwood**, Director of Communications, Electoral Commission [Q187–231](#)

### Wednesday 13 December 2023

**Simon Hoare MP**, Parliamentary Under-Secretary of State (Local Government), Department for Levelling Up, Housing and Communities; and **Liz Owen**, Deputy Director for Registration and Franchise, Department for Levelling Up, Housing and Communities [Q232–282](#)

## Published written evidence

---

The following written evidence was received and can be viewed on the [inquiry publications page](#) of the Committee's website.

ELR numbers are generated by the evidence processing system and so may not be complete.

- 1 Association of Electoral Administrators ([ELR0009](#))
- 2 Department for Levelling Up, Housing and Communities ([ELR0005](#))
- 3 Edwards, Mrs Amanda (Electoral Services and Civil Registration Manager, Carmarthenshire County Council) ([ELR0010](#))
- 4 Edwards, Mrs Amanda (Electoral Services and Civil Registration Manager, Carmarthenshire County Council) ([ELR0001](#))
- 5 Electoral Reform Society ([ELR0003](#))
- 6 James, Professor Toby ([ELR0013](#))
- 7 James, Professor Toby S. (Professor of Politics and Public Policy, University of East Anglia); and Garnett, Garnett, Dr Holly Ann (Associate Professor of Political Science, Royal Military College of Canada) ([ELR0006](#))
- 8 Local Government Information Unit ([ELR0011](#))
- 9 My Vote My Voice ([ELR0008](#))
- 10 Mycock, Dr Andrew (Reader In Politics, University of Huddersfield); and Loughran, Dr Thomas (Lecturer in Politics, Lancaster University) ([ELR0002](#))
- 11 Solace ([ELR0007](#))
- 12 The Electoral Commission ([ELR0004](#))

## List of Reports from the Committee during the current Parliament

---

All publications from the Committee are available on the [publications page](#) of the Committee's website.

### Session 2023–24

Number	Title	Reference
1st	Financial Reporting and Audit in Local Authorities	HC 59
2nd	Council Tax Collection	HC 57
3rd	Financial distress in local authorities	HC 56
1st Special	Financial Reporting and Audit in Local Authorities: Government Response to the Committee's First Report	HC 536

### Session 2022–23

Number	Title	Reference
1st	The regulation of social housing	HC 18
2nd	Long-term funding of adult social care	HC 19
3rd	Exempt Accommodation	HC 21
4th	Draft Strategy and Policy Statement for the Electoral Commission	HC 672
5th	Reforming the Private Rented Sector	HC 624
6th	Funding for Levelling-Up	HC 744
7th	Reforms to national planning policy	HC 1122
8th	Pre-appointment hearing for the role of Local Government and Social Care Ombudsman and Chair of the Commission for Local Administration in England	HC 1819

### Session 2021–22

Number	Title	Reference
1st	The future of the planning system in England	HC 38
2nd	Local authority financial sustainability and the section 114 regime	HC 33
3rd	Permitted Development Rights	HC 32
4th	Progress on devolution in England	HC 36
5th	Local government and the path to net zero	HC 34
6th	Supporting our high streets after COVID-19	HC 37
7th	Building Safety: Remediation and Funding	HC 1063

<b>Number</b>	<b>Title</b>	<b>Reference</b>
8th	Appointment of the Chair of the Regulator of Social Housing	HC 1207

### Session 2019–21

<b>Number</b>	<b>Title</b>	<b>Reference</b>
1st	Protecting rough sleepers and renters: Interim Report	HC 309
2nd	Cladding: progress of remediation	HC 172
3rd	Building more social housing	HC 173
4th	Appointment of the Chair of Homes England	HC 821
5th	Pre-legislative scrutiny of the Building Safety Bill	HC 466
6th	Protecting the homeless and the private rented sector: MHCLG's response to Covid-19	HC 1329
7th	Cladding Remediation—Follow-up	HC 1249