ASSOCIATION OF ELECTORAL ADMINISTRATORS

Elections and Individual Electoral Registration - The challenge of 2015

July 2015
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Executive summary

The Association of Electoral Administrators (AEA) is a non-governmental and non-partisan body founded in 1987 to represent the interests of electoral administrators in the United Kingdom.

The AEA strongly supports and advocates the principle that all those with a role in organising elections should consider the voters’ interests above all other considerations.

Electoral administrators continue to deliver elections within an increasingly complex and challenging environment even when the odds are stacked against them. This was clearly the situation for the complex elections held on 7 May 2015 following the introduction of Individual Electoral Registration (IER). Electoral administrators and suppliers were stretched beyond belief during the 18 months before polling day with the introduction of IER and the complexities and bureaucracy it brought with it. Preparations for the elections were behind as a result of the impact of the introduction of IER and electoral administrators were exhausted before the election timetable even started.

The AEA is acutely concerned that, unless the issues identified in this report are properly considered and addressed, the structures, processes, available resources and people delivering electoral administration will not be able to cope with the additional burdens being continually placed upon them.

However, despite everything, yet again electoral administrators successfully delivered complex elections following the most significant changes to electoral registration in over 100 years - but at what cost?

This report provides an account of the experience of electoral administrators in delivering IER and the polls on 7 May 2015 and offers recommendations for improvements to the framework for electoral administration in the UK.

The recommendations outlined in this report will require urgent joint action by those with a role in shaping electoral policy and practice in electoral administration. The AEA looks forward to actively working with Government, the Electoral Commission and other key stakeholders in moving this agenda forward.

Our key recommendations:

- The UK Government should undertake a thorough and UK-wide review of funding, staffing structures (including career progression) and other resources required to deliver core professional electoral services, with the aims of delivering a coherent and efficient
structure across the UK, cost effectiveness over time and ensuring that funding for new responsibilities reaches electoral services. (Paragraph 2.23)

- Fees and Charges should cover the additional costs of administering the electoral registration process in the run up to an election, including absent voting applications and related matters. (Paragraph 2.15)

- The UK Government should bring forward a single Electoral Administration Act in accessible language setting out the high-level framework governing electoral registration, elections and referendums in the UK, with the operational detail of registration, absent voting, and elections contained in secondary legislation, all with the key aim of achieving the simplification and consistency of rules across all electoral administration matters. (Paragraph 2.35)

- Except in cases of unforeseen emergencies, changes to election law should not be applicable to any elections within a six-month period from the date the legislation comes into effect. (Paragraph 2.39)

- The UK Government should design and implement a clearer and local system of accountability and challenge through the introduction in election law of a formal complaints system as outlined in the Law Commissions’ provisional proposal 13-17. (Paragraph 2.42)

- The UK Government and/or the Electoral Commission be asked to investigate the possibility of establishing a national framework of electoral print suppliers in the interests of securing efficiency, resilience and operational certainty for future elections. (Paragraph 4.9)

- The UK Government should review the registration of students and care homes under IER, with a view to making legislative changes to allow EROs to directly register people at "institutions". (Paragraph 5.8)

- The UK Government should carry out a review of IER processes and IER during the UK Parliamentary General Election (UKPGE), with a view to implementing legislative changes to improve such processes, including as to whether there is still a need to continue with an annual canvass if all local authorities were provided with
software functionality to easily data mine local authority and government databases. (Paragraph 5.26)

- The UK Government should continue to provide sufficient funding directly to EROs to administer IER to ensure an accurate and complete register is maintained. (Paragraph 5.11)

The full recommendations are included at the end of this report.
1 Introduction

1.1 The elections held on 7 May 2015 were probably the most challenging elections in history from an electoral administrators, suppliers, public and political point of view.

1.2 There were new political parties entering the national political arena and far more new candidates across the country than at previous elections. There was the new trend of political party leader debates being held on national TV which included a debate of seven political party leaders. In addition, there was intense national and social media coverage. The elections were being closely fought with a high level of public and media scrutiny and interest resulting in a slightly higher turnout. During the weeks preceding the election, it was reported in the national media that opinion poll forecasts were showing that there would be no overall winning party.

1.3 In addition, the 18 months prior to the polls represented the most challenging and complex period in electoral history. For those who were responsible for the introduction of IER, followed by the delivery of the UKPGE, it became a task of epic proportions. The difficulties of introducing IER in advance of the combination of the UKPGE with other polls in most areas, and the added complexity of parliamentary boundaries crossing local authority boundaries in many areas cannot be understated.

1.4 The challenges and complexity of delivering a national election under the new provisions of IER along with other new legislation brought electoral administrators and suppliers to almost breaking point. Electoral administrators rose to the challenges in their usual professional manner with dedication and commitment to ensure the elections were delivered in the best way they could. The future administration of elections needs to be the subject of a comprehensive review, as the challenges faced by administrators in the run up to and during the May 2015 elections cannot be allowed to be continued for future elections. This report considers the elections held in May 2015, together with the implications of the introduction of IER immediately before these elections.

Purpose of this report

1.5 The purpose of this report is to present the issues and experiences expressed by electoral administrators who were tasked with delivering the elections that took place in May 2015, which was also the first national election delivered under IER. The report also
makes recommendations for changes and improvements for the future in relation to the electoral process.

1.6 It is the AEA’s intention to offer solutions where we can and a willingness to work with members of the Association, Governments and civil servants, Electoral Registration Officers (ERO), Returning Officers (RO), the Electoral Commission and other key stakeholders where there is a need for further consideration. Solutions should be capable of being administered effectively by statutory officers and electoral administrators and deliver outcomes that support the effective participation by eligible electors and by those standing for election.

1.7 The Association does not, however, comment on the performance of individual EROs or ROs or their staff.

1.8 It is not within the Association’s remit to address issues of voter engagement or matters relating to party and election finance, other than where there is an impact on or from the administration of electoral processes.

**AEA background**

1.9 The Association of Electoral Administrators (AEA) was founded in 1987 and is the professional body representing the interests of electoral administrators in the United Kingdom. It is a non-governmental and non-partisan body and has some 1,857 members, the majority of whom are employed by local authorities to provide electoral registration and election services.

1.10 The key aims of the AEA are to:

- Contribute positively to electoral reform within the United Kingdom.
- Foster the advancement of consistent and efficient administration of electoral registration and the conduct of elections in the UK.
- Raise the profile of electoral administration both within the UK and internationally.
- Enhance and maintain the AEA’s reputation as the leading professional body for electoral administrators within the UK.

1.11 The AEA supports and advocates two key principles set out by Gould¹ in his report on the 2007 elections in Scotland, namely that:

- All those with a role in organising elections should consider the voters’ interests above all other considerations; and

Electoral legislation should not be applied to any election held within six months of the new provision coming into force.

1.12 The AEA has published several reports on the administration of the elections that took place across the UK as follows:

- 15 November 2012 – A question of timing? The administration of the Police and Crime Commissioner elections in England and Wales;
- 5 May 2011 - The administration of the referendums and elections across the UK in 2011; and
- 6 May 2010 – Beyond 2010: the future of electoral administration in the UK.

1.13 The above reports reflected on the experiences of those tasked with delivering elections and referendums within an increasingly complex and challenging environment. This has continued to reach new levels of challenges, with the first national election since the introduction of IER along with other legislative changes.

Sources of evidence used in this report

1.14 The findings and recommendations contained in this report are based on a range of evidence. The request for information from AEA members was in two stages: real time reporting as issues arose and post-election reporting. All members including ROs, EROs, electoral services managers and electoral services officers (including junior members of staff) were encouraged to complete the real time and post-election reporting options available. Details of the reporting options are set out in Appendix 1.

1.15 This report draws on the responses we received from administrators from both the real time and post-election reporting options. The total responses received for each of the reporting options outlined above were as follows:

- Eform red button labelled “Report Election Issues“- 74 submissions received representing 40 local authorities.
- Local Authority Election Log of Issues, Comments and Changes Spreadsheet - 8 local authorities responded.
- Online survey of AEA members - 201 members responded to the survey representing 78 local authorities and 1 supplier.

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2 A question of timing? The administration of the Police and Crime Commissioner elections in England and Wales
3 The administration of the referendums and elections across the UK in 2011
4 Beyond 2010: the future of electoral administration in the UK
AEA branches post-election review workshop - the majority of AEA branches carried out a post-election review, either as an agenda item at their branch meeting or in the form of the workshop outlined in Appendix 1.

Other sources of data and evidence

1.16 A range of other sources have been used, both as a secondary check and/or confirmation regarding the themes and issues reported to us directly by administrators. Where relevant, these have been used to provide other views and context. These sources include:

- Minutes, papers and correspondence relating to the relevant planning groups and electoral bodies.
- Guidance, resources and bulletins for ROs and electoral administrators issued by both the Electoral Commission and Cabinet Office.
- Questions and issues on the AEA website Members’ forum and received by email.
- Previous AEA reports, consultation responses and policy papers. In particular, numerous references are quoted throughout the report from the AEA national response to the Law Commission – *Electoral Law: A Joint Consultation Paper*[^5] which was submitted in March 2015.

References

1.17 This report includes anonymised quotations from the feedback and submissions that we received and have been selected as representative of the nature of concerns and views expressed in relation to a particular issue. In cases where the view expressed differs from comments received generally on an issue, we have indicated this. In some cases, we have simplified job titles in order to preserve an officer’s anonymity.

1.18 References to regions are references to the AEA Branch structure. You can find details of our structure on our website: [http://www.aea-elections.co.uk/about/regional-branches/](http://www.aea-elections.co.uk/about/regional-branches/)

Roles and responsibilities – references within this report

1.19 There are a number of different statutory officers with specific responsibilities for delivering the different types of elections that took place in May 2015 and for electoral registration.

1.20 For the purpose of this report, the generic term *Returning Officer (RO)* is used throughout.

1.21 However, in respect of the UKPGE in England and Wales, it is the Acting Returning Officer (ARO) who has responsibility for the day-to-day conduct of the election. In Scotland, it is the Returning Officer. Acting Returning Officers can appoint Deputy Returning Officers (DARO). In Scotland, the role is Depute Returning Officer (DRO).

1.22 It is recognised that there is a different structure in Northern Ireland and that the Chief Electoral Officer has responsibility for the conduct of the UKPGE in Northern Ireland.

1.23 In Scotland, there is also the Electoral Management Board (EMB) which consists of ROs, Deputy ROs and EROs under the leadership of a Convenor with the general function of coordinating the administration of local government elections. The aim of the Board is to provide a consistent national approach to electoral administration across Scotland.

1.24 Local government ROs are responsible for the conduct of local government elections in England, including the mayoral elections.

1.25 In Great Britain, the Electoral Registration Officer (ERO) is responsible for compiling and maintaining the electoral registers for the UK Parliamentary and local government elections, in addition to receiving and determining applications from electors for absent voting arrangements. However, in the majority of cases the RO is also the ERO and therefore the same person but with two different formal appointments. In Northern Ireland, the Chief Electoral Officer undertakes these responsibilities. However, the term *Electoral Registration Officer (ERO)* is used throughout this report to reflect this statutory role and responsibility.
2 Framework

2.1 The 2015 UKPGE took place on Thursday, 7 May in 650 constituencies. In addition, local government elections took place across England (excluding London) in 281 principal local authority areas. There were also 6 mayoral elections and a Police and Crime Commissioner’s council tax increase referendum in Bedfordshire. Parish council elections in England, where they were contested, also took place on the same day.

Structure of electoral administration in the UK

2.2 As outlined in the previous chapter, there are two formal statutory officer appointments across the UK with responsibilities for electoral registration and the conduct of the elections in May 2015\(^6\).

2.3 In March 2015, the AEA responded to the Law Commission – *Electoral Law: A Joint Consultation Paper* supporting the provisional proposal that the ceremonial role, in England and Wales, of sheriffs, mayors, and others as returning officer at UK parliamentary elections should be abolished\(^7\).

2.4 Electoral policy is generated by Governments and the Electoral Commission. Subsequent legislation is then debated and/or approved by Parliaments and Assemblies.

2.5 The Electoral Commission has a statutory role in setting performance standards, regulating party and election finance, running referendums, public awareness activity, providing advice and assistance, and reporting on the administration of elections.

2.6 Local authorities provide core electoral services which in England and Wales is generally delivered by the same team “electoral services” who deliver both electoral registration and elections. However, following the introduction of IER and the current complexity of elections, this may not be sustainable and there is a need to consider whether there is a better way of delivering these services.

2.7 Local authorities also review polling districts and polling places.

2.8 There are also numerous non-statutory bodies and groups:

Cabinet Office: Elections Policy Co-ordination Group, IER Programme Board and Expert Panel;

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\(^6\) Except in Northern Ireland where there is one Chief Electoral Officer with overall responsibility for registration and the conduct of elections.

\(^7\) [Law Commission – Electoral Law: A Joint Consultation Paper – Provisional Proposal 3-1](#)
Electoral Commission: UK Electoral Advisory Board, and the Elections and Registration Working Group;

There are also county and other local groupings across the country.

2.9 In addition, there are a range of partners and contractors – including the police, Royal Mail, print companies, the Government Digital Service and electoral management software suppliers.

2.10 Over the years, there has been considerable debate about the structure of electoral administration and, in May 2008, the AEA responded to the Electoral Commission’s Issues paper, *Examination of the structure of electoral administration in the United Kingdom*, as follows:

"...the current structure does not ensure consistently high quality service. There are major problems with the complex and fragmented legal framework, resources and funding arrangements and inadequate accountability mechanisms..."

2.11 Since that statement, there has been yet further legislation “bolting on” new provisions year on year to those already in place, with 2014 seeing the most significant change to electoral registration in the last century with the introduction of IER.

2.12 In March 2015, the AEA responded to the Law Commission – *Electoral Law: A Joint Consultation Paper* welcoming and fully supporting the following provisional proposals:

- The current laws governing elections should be rationalised into a single, consistent legislative framework governing all elections.
- Electoral laws should be consistent across elections, subject to differentiation due to the voting system or some other justifiable principle or policy.

2.13 Resourcing continues to be a significant concern, with evidence in this report of core electoral services teams continuing to work excessive hours in order to deliver the elections and the new registration provision (IER). Additionally, there are still issues in relation to funding arrangements.

**Funding and Resources**

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8 AEA formal response to the Electoral Commission issues paper - Examination of the structure of electoral administration in the United Kingdom
2.14 Funding for core electoral services teams and for electoral registration is provided by local authorities in England and Wales. In Scotland, electoral registration is delivered separately from elections in most areas through Joint Boards comprising of a number of local authorities. In Northern Ireland, all electoral services functions are delivered by the Chief Electoral Officer funded by the Northern Ireland Office. The additional costs incurred following the introduction of IER have been funded by Section 31 grants from the Cabinet Office in England and Wales with separate arrangements in Scotland. Future funding after 2015/16 is uncertain at present.

2.15 The fees and charges for the UKPGE do not include funding for the core electoral services team or for registration and absent vote application processes, both of which are an integral and critical part of the overall electoral service. This area of work has increased significantly following the introduction of IER. This includes access to online registration resulting in an increase in the number of duplicate registration applications having to be dealt with following the Electoral Commission national registration campaign. There was also the added complication of proof of evidence having to be supplied after the registration deadline for non-matched electors. Political parties had become more aware of emergency proxies being available for business reasons and not just medical emergencies. This has undoubtedly increased the volume and workload in the run up to the election.

2.16 There has been progress in improving the framework for fees and charges since the last UKPGE, whereby an overall maximum recoverable amount is now provided to each RO which allows them greater flexibility to make decisions as to how the money is spent. In addition, a new funding model has been adopted since the European Parliamentary Elections in 2014, which sets the basis for funding allocations on settled expenditure at the last relevant poll, which is uplifted to take account of changes in electorate sizes, postal vote numbers, inflation and increases to Royal Mail charges.

2.17 A further change in England and Wales has been the scrutiny of election accounts which now falls into three categories, namely, plain accounts, light touch and full scrutiny. 60% of ROs are under the light touch category which requires some documentary evidence to be submitted for certain payments, rather than full documentary evidence for all payments which is the requirement for full scrutiny (20% of ROs). Plain accounts submit the least amount of evidence (20% of ROs). However, it is important to note that, whilst the new
procedures under the plain accounts and light touch categories would appear to mean less time and work required to prepare the accounts, in practice a full set of accounts still needs to be prepared, in case they have to be submitted at short notice for auditing purposes.

2.18 The submission of accounts for these elections must be within 6 months.

2.19 The local government elections across England were funded by the local authorities. Parish council elections where they were contested are funded by the parish council, and the Police and Crime Commissioner’s council tax increase referendum in Bedfordshire will be funded by Bedfordshire police. These local elections have an impact on how much can be claimed for the conduct of the UK Parliamentary election and adds to the accounting complexity with amounts being split between the various elections.

2.20 Following the introduction of fixed term parliaments, it was assumed that the funding allocations and guidance would have been in place in plenty of time before the election timetable commenced. The timing of funding allocations and guidance has been raised previously in AEA election reports. The Fees and Charges Order for the UKPGE held on 7 May 2015 was only made on 26 February 2015 and was issued on 30 March 2015. The receipt of the Writ was on the 31 March and the majority of advances to ROs were paid between 14-16 April 2015.

"Advance was not received until after timetable has begun and ultimately had to be requested again."

Electoral Services Manager, West Midlands

"...actual funding was VERY late in arriving in our bank account."

Senior Electoral Services Officer, Eastern

"As usual everything was late. Fees were paid after the election timetable started. Regulations were late and not within an agreed 6th month rule."

Electoral Services and Logistics Manager, Southern

2.21 Whilst there was helpful consultation on these arrangements through the Elections Policy Coordination Group, confirmation of actual amounts and the payment of advances to ROs came some considerable time after ROs needed to be able to commit funds in
order to enter into printing contracts, venue hire and staffing arrangements. The fact that the Fixed-Term Parliaments Act 2011 ensured that the date of the 2015 UKPGE was known well in advance unlike previous UKPGEs, makes it difficult to understand why all of this could not have been in place several months prior to the date of the election.

"We still do not have the fees and charges guidance, despite being eight weeks from the elections. We have already started committing to expenditure, without knowing if we can claim it back. We do not expect there to be any significant changes to the guidance from last year, but it would be nice to have the information well in advance!"

Electoral Services Manager - Southern

2.22 IER and the ease of access of being able to register online led to an increased volume of registration applications in the lead up to the election, encouraged by the Electoral Commission campaigns and media coverage. IER has also created additional processes and workload in relation to receiving and checking documentary evidence for applicants who fail verification, which has a significant impact on workload during this period. The changes to absent voting legislation in recent years has had a significant impact on the resources required to process absent vote applications. This includes postal voting on demand and the increased use of emergency proxies. A review of fees and charges is needed to consider the effect of these changes, to ensure that funding is provided to cover the additional costs of administering the electoral registration process, including absent voting arrangements from the 1st January until election day.

"The global total is enough, but I anticipate problems with claiming some of the things (e.g. very determined security, large well-equipped count centre, contingency polling stations) that WE think are important but which the CO [Cabinet Office] doesn’t. Additionally, I doubt if CO are going to understand just how many staff have to be drafted in to fill the roles of EAs [Electoral Administrators] who can’t get off the now continual registration process. I believe the fees and charges order reflects the 19th Century, not the 21st. Further,
the light touch accounting regime is irrelevant if all the light touch authorities are going to be NAO’d [National Audit Office] anyway.”

Head of Electoral Services, London

"Elections staff were under immense pressure trying to keep on top of IER applications as well as supporting the election preparations. A number of casual staff were employed but there was a lack of understanding of how the system worked for them to be really effective. The CO need to provide more funding to support the additional hours electoral staff had to spend on IER as this cannot be claimed from the ECU.”

Electoral Services Manager, South West

"Resources would have been impossible had the LA not agreed to appoint temps for 3 months over the election period. The Cabinet Office should fund this.”

Electoral Services and Logistics Manager, Southern

2.23 Again this year, as highlighted in previous AEA election reports, a significant number of administrators continue to highlight the reliance of the electoral system on goodwill, devotion and commitment in order to ensure that elections are delivered.

2.24 There are, relative to other professions, a very small number of experienced electoral administrators. Each year, the number of people leaving the profession, taking with them vital skills and experience, has been gradually increasing as set out in the following table. The latest figure represents an annual attrition rate of some 13.2% in respect of full members of the AEA (1857 members).

<table>
<thead>
<tr>
<th>Year</th>
<th>Ceasing to be an AEA member</th>
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<tbody>
<tr>
<td>2010</td>
<td>158</td>
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<tr>
<td>2011</td>
<td>165</td>
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<td>2012</td>
<td>181</td>
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<td>2013</td>
<td>216</td>
</tr>
<tr>
<td>2014</td>
<td>214</td>
</tr>
</tbody>
</table>

"The general Nitro-glycerine nature of elections leading to no-one wanting to do this anymore.”

Head of Electoral Services, London

"Personally this has been the most difficult election I have been involved with. I worked in excess of 120 hours above
my normal working time in a matter of 6 weeks which doesn't include the 36 hours in the 48 hour period of polling day and the count. I am still feeling the effects of tiredness and stress some weeks after the election and feel that I will not be involved in any further parliamentary elections.”

Senior Electoral Officer, North East and Yorkshire

"Lack of sufficient experienced electoral administrators in many local authorities particularly to cover the complex combinations of polls at the end of this decade e.g. 2019 and 2020. Many newly trained electoral administrators are desperately needed!"

Elections Specialist Practitioner, South West

2.25 Given that core electoral services are generally delivered by very small teams, or even an individual member of staff, any loss of experienced staff can have a significant impact on service delivery. In addition, the impact of local authority budget cuts over recent years has also meant that experienced local authority staff who were called upon during an election to undertake specific, often senior, roles are no longer available.

2.26 Whilst the introduction of IER has meant there has been an increase in the number of new staff within core electoral services teams, in the majority of cases the work force has not matched the number of hours required.

"In anticipation of the workload at the 2015 Parliamentary Election and taking into account the additional work due to IER, the permanent staffing level of 6 full time staff were supplemented from September 2014 by 5 temporary staff, and then increasing to a sixth person from March 2015. In addition 3 other Council staff (who had worked previously to assist at the time of elections) were seconded to work outside their contracted hours, therefore totalling 15 in all from March to assist with registration, absent vote work in addition to other election duties. Following Easter staff worked late evenings and every weekend (including Bank Holidays) and without this registration, absent voting and election work would not have been achievable. PE [UKPGE] elections are those that always attract the most attention and as a result require more temporary assistance than other elections,
however with the advent of IER I anticipate more being required at all future elections.”

Head of Electoral Services and Elections, London

2.27 The new staff recruited for IER are largely inexperienced, as there is no experienced electoral pool of resources available to assist recruitment. In addition, the majority of new IER staff are on temporary fixed term contracts due to the uncertainty of IER specific funding being available after 2015/16. All the above issues were reported by members on numerous occasions.

2.28 The report received below really brings the message home as it summarises life as an electoral administrator in the run up to the UKPGE. It clearly demonstrates that the administration of elections and electoral registration cannot continue in this way and that the methods of delivery, structures, legislation and processes need to change urgently.

"Hello, I just feel the need to report here about how the elections team is feeling - just one short week before the election. In all honesty, the team is at absolute breaking point. The pressure that we’re feeling here is so intense I believe that it is harmful to the health of all of the permanent members of this team. Since mid-February we have worked without a break - often doing days of up to 12 hours and, since the notice of election was published, we’ve worked every Saturday and the Easter weekend. We still have so much to do and we will be working all of this bank holiday weekend (with the exception of Sunday due to an [event] causing road closures). We are carrying three vacancies in the team and we’ve been unable to fill them on a permanent basis due to uncertainties around long term funding. We are facing the biggest and most complex set of elections I’ve ever known in over 25 years in this job with an untrained / temporary team. We have had no time to properly train and support this new team. They have had enough, the team has had enough. I think that I need to be done with this job if this is the future of elections. I remember John Turner's words when he read out an [AEA member’s] letter at conference and how close this election would come to failure for some. We are at that point right now and that makes me so sad. I simply don't know if all of the members of this team will make it through the next few days. One member of this team has just walked away from the postal vote opening session in utter despair. This is down to exhaustion and concern at the mountain
[they] still have to climb. I am full of concern for myself, the team and our ongoing reputation as a professional team of Electoral Administrators”.

Electoral Services Officer, North East and Yorkshire

2.29 There were numerous reports from electoral administrators which clearly demonstrates there is an urgent need to review how electoral services are delivered in the future with the necessary resources being made available.

"The main impact on Core team is that registration does not stop, so it is essential to draft in and train, well in advance, other support workers. This costs. It was possible to do it in a large unitary with a deeply committed Returning Officer, but generally I feel the EA [electoral administrator] world is now very fragile indeed and have no doubt that the type of problems that did emerge elsewhere – often with highly experienced and committed staff – came as a consequence of what seems like designed-in fragility.”

Head of Electoral Services, London

"...need to highlight the extraordinary effort and time which administrators dedicate to this job. There has to be a wider understanding of what it actually takes to get this done. It isn't "just our job". Most administrators I know literally abandon their personal lives to get this work done. I don't mean to sound like 'woe is me' but we give up an awful lot, for the sake of our professional reputations. I think for a lot of us, yes, we expect this - for a short period, it comes with the job. I have a personal expectation that from mid-/ end-March to the end of May, it will be intense, I will work extra hours, I will do less in my personal time outside of work - and I am willing to put up with this. Due to many different factors, this was significantly extended this year. Some of this was down to our own local issues which we are addressing, but some was down to matters such as combination. We worked over and above our contracted hours from mid-February. This should not become the norm and it should not be acceptable ...”

Electoral Services Officer, North East and Yorkshire

Recommendations:

The AEA reiterates the following recommendations which have been made in previous election reports:
• The UK Government should undertake a thorough and UK-wide review of funding, staffing structures (including career progression) and other resources required to deliver core professional electoral services, with the aims of delivering a coherent and efficient structure across the UK, cost effectiveness over time and ensuring that funding for new responsibilities reaches electoral services.

• As with other election law, if Fees and Charges Orders remain the mechanism for funding specific elections and referendums, the appropriate Orders should be in place at least six months prior to the date of such elections and referendums.

• Fees and Charges should cover the additional costs of administering the electoral registration process in the run up to an election, including absent voting applications and related matters.

Combination and complexity

2.30 The number of polls being combined and held on the same day appears to be increasing year on year following the introduction of legislation for local referendums.

2.31 In Bedfordshire, one local authority had five different elections taking place on the same day: UKPGE, local authority, mayoral, parish council, and a referendum for the Police’s share of the council tax proposed by the Police and Crime Commissioner. The complexity of such a combination goes without saying, with the number of votes allowed for candidates at the different elections varying along with a referendum question to be answered. Administering such a complex combination with different legislation, different timetables and differing electoral systems is challenging and such a combination could also be challenging for the voter who would have received five ballot papers on polling day or in their postal vote pack.

"The five way combination experienced [here] must never be repeated. With boundary differences between Parishes, wards and constituencies it is a recipe for disaster and, frankly, I am not sure how disaster was avoided in those 'peculiar' areas. The Law Commissions’ proposal to limit combinations to three is one which must be adopted. Even if this means taking the matter outside of the Law Commissions’ proposed draft Bill and introducing it as part of another Bill dealing with constitutional matters."

Head of Democratic and Registration Services, Eastern
"The scale and scope of the election was unsurpassed in terms of the complexity of the combination of elections, [LA shared service area 1] one third of district seats and parishes and parliamentary; [LA shared service area 2] all out district, parish and parliamentary. Since the last general election the law was changed which previously prohibited the holding of more than one other election with a parliamentary. Whilst the combination is advantageous in terms of cost sharing and turnout, it creates complexity of administration for a small core team, voter confusion (poll cards are sent early March so contain information on all the elections that might take place, as opposed to which are contested). This also caused significant delays at the count with the need to separate district and parish papers. Whilst the law was changed to allow the counting of parliamentary votes before the verification of district and parish papers, verification still had to be completed prior to parliamentary declaration, therefore in reality this proviso was of little use, as every box had to be checked for cross contamination and would have caused a delay before declaration."

Democratic and Elections Manager, Southern

"Can be very complicated - causes confusion to electors and polling station staff. Causes logistical complications, staffing complications, timing complications, problems with EMS and complications with replacement postal packs."

Democratic Services Officer (Electoral), East Midlands

"The impact of running 3 elections, especially when combined with a National Election made planning the count and especially ticketing extremely difficult. The problems where some polling stations having 3 ballot boxes, 3 ballot paper accounts etc. and keeping on track of the different franchises and the corresponding number was understandably hard for staff who do not work day in day out in elections."

Senior Electoral Officer, North East and Yorkshire

"This particular combination of polls is very difficult to run in tandem because of the mixed franchise and the problems associated with cross boundary arrangements. It placed huge strains on my small team and at times we were stretched close to breaking point. This was because of the sheer volume of work and the inherent difficulties in dealing with
the enhanced level of public interest and the number of enquiries coming in at the same time as trying to deal with the processes necessary to deal with the nomination of large numbers of local government candidates (in our case more than 500), the volume of registration applications (especially under IER) and of postal and proxy applications. I have concluded that this particular combination should not happen again as a result of these problems. Frankly it is just too much for a small local authority elections team to cope with.”

Democratic and Electoral Services Manager, Eastern

"Because of the combination issues with our 3 main elections (District/Mayoral/Parliamentary), plus the added issue of a possible Parish contest on just 4 of our wards, this caused enormous problems. "Software system set up was problematic/time consuming/long winded (complicated re which elections to combine for different processes). It's also an issue with the "bitting and bobbing" you have to do, waiting to see if they're contested or not and then remembering to make adjustments if they’re not contested, for instance e.g. the wording on our combined postal voters statements and stationery had to be changed for an uncontested ward, for instance. It doesn't sound much when you say it now, but this was all done in a very short timeframe at the close of nominations when you are working against the clock and printer/proofing deadlines. Pressure from printers to send poll card data earlier than usual and not capturing the 1 April additions with this first data run. Always seemed to be up against it then to get the 1 April additional electors (and minus 12 electors) poll cards printed. Printers dealt with the combinations (different franchise) really well with the poll cards, but we couldn't fit any more wording on the poll card for a fourth election (for our Parish area). In the end the Parish decided not to have poll cards, otherwise they would have had to have stood the cost of a "stand alone" poll card. Combining postal packs and decisions on which to combine was challenging, decision made to combine the District/Mayoral packs (same franchise) and the Parliamentary pack separate. This was hard to coordinate regarding the dates the printers could physically print the first batch of postal voters and send them out (and also if they could get both sets of postal votes out at the same time). We wanted to send the main first batch of postal votes out as soon as possible, so that we could start opening them (opening 2 sets of postal votes is challenging, especially when voters sometimes put the wrong papers in the wrong envelopes), so
we wanted to have our first postal votes openings as soon as possible to be sure we could manage the increased volumes and complexities of the combined packs. Replacing postal votes for people who had lost/spoilt theirs was more time consuming than usual because of the 3 sets of postal votes which had to be replaced.”

Electoral Services Manager, East Midlands

2.32 In March 2015, the AEA responded to the Law Commission – \textit{Electoral Law: A Joint Consultation Paper} supporting the following provisional proposals which would, if implemented, make combined polls easier to administer:

- The law governing combination of coinciding polls should be in a single set of rules for all elections\textsuperscript{11}.
- A standard legislative timetable should apply to all UK elections, containing the key milestones in electoral administration, including the deadlines for registration and absent voting\textsuperscript{12}.
- Any polls coinciding in the same area on the same day must be combined – in relation to this proposal the AEA supported the provisional proposal, but with an upper limit on the number of polls being allowed to take place on any one day. On such a basis, if that limit had already been met in relation to other polls taking place on a particular day, the further poll should be held on a separate day at a date to be fixed by the Returning Officer\textsuperscript{13}.

2.33 In relation to provisional proposal 10-8: “Should the returning officer have a power to defer a fourth coinciding poll in the interests of voters and good electoral administration? What safeguards might sensibly apply to the exercise of the power?” The AEA responded as follows which outlines a suggested formula in relation to an upper limit on the number of polls to be combined:

“The AEA is concerned with the provisional proposal to combine polls being at the discretion of the Returning Officer who may, for financial reasons, be under extreme pressure from the local authority, public organisation or parish council and others to combine the poll, if the timing allows, no matter how many polls are already scheduled to take place on that

\textsuperscript{11} Law Commission – Electoral Law: A Joint Consultation Paper – Provisional Proposal 10-6
\textsuperscript{12} Law Commission – Electoral Law: A Joint Consultation Paper – Provisional Proposal 10-4
\textsuperscript{13} Law Commission – Electoral Law: A Joint Consultation Paper – Provisional Proposal 10-7
day. Along with scheduled local and national polls, there could also be principal area or parish by-elections and local referendums taking place on the same day of the other polls scheduled. As a result, the AEA would wish to see the proposed change to be at the discretion of the Returning Officer, but with an upper limit on the number of polls being allowed to take place on any one day. On such a basis, if that limit had already been met or exceeded in relation to other polls taking place on a particular day, the further poll should be held on a separate day at a date to be fixed by the Returning Officer. The current hierarchy of polls should be clearly set out in legislation.”

Given the likelihood of combined polls arising from the number of scheduled elections for 2019 and 2020, the AEA would suggest the following formula in relation to the upper limit on the number of polls being combined on any one day:

- Up to 4 elections - No RO discretion
- 5 elections - Discretion of RO
- 6 elections - Cannot combine, so no discretion for the RO

**Cross boundaries**

2.34 Parliamentary elections bring with them cross boundary issues because a large number of parliamentary constituencies cross over local authority boundaries. The impact of cross boundaries includes the giving and taking in of electors from other local authority areas which can have implications for the administration of the elections, such as software systems, poll cards, postal votes, ballot papers, polling station staff appointments and training, delivery of ballot boxes and the count. Combined polls also add to the complexity of dealing with cross boundary issues. EROs and ROs agree and adopt a contract or some form of memorandum of understanding in relation to the administration of cross boundary elections and work closely together in partnership. However several electoral administrators reported issues in relation to the administration of cross boundary and combined polls:

"Despite early planning and regular meetings the Cross Boundary Protocol (advised as part of the EC Guidance) was not signed off by Lead Authority until two days before the Election. Elements of the protocol were not adhered to, requests for urgent data and reports outside of agreed date.

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The issue of Cross Boundaries across the country needs to be addressed; they add another layer of complexity to the proceedings. Additional training, monitoring and changes to software packages are needed to support authorities with Cross Boundaries.”

Electoral Services Manager, West Midlands

"Software! Cross-boundary issues have been a nightmare...All our problems are matters which are beyond our control and the complications of having full district and parish elections with the cross boundary general election have been horrendous.....”

Electoral Services Manager – South West

“Cross boundary data exchange is a nightmare already!”

Electoral Services Manager – South West

"There are significant issues with regard to the lack of coterminous local government and constituency boundaries, which have been highlighted and amplified by Individual Electoral Registration..... This means the authority for which they are registered and who issues the poll card is not the authority running the parliamentary election but is running the local elections and any changes they might wish to make e.g. becoming a postal or proxy voter. Therefore electors don’t know who to call.”

Democratic and Elections Manager, Southern

"Significant issues in resourcing staff due to cross boundary implication - many of our staff were not happy working for another authority in effect and may have been lost. Core elections team worked ridiculous hours for weeks from the turn of the year in preparation for the election. 14-16hr days became common place during the election period.”

Democratic and Electoral Services Manager, East Midlands

Legislation

2.35 In the AEA election report following the 2010 elections, reference was made to the following statement which is still relevant for this year's elections:

"... the United Kingdom presents a challenging environment for those who need to find their way around electoral law."
This is becoming more difficult as almost yearly changes to electoral legislation must be implemented. Changes are also implemented in an asymmetrical way, some implemented across the UK, some only in Great Britain and some in England and Wales but not in Scotland…. The fragmented approach can obviously lead to confusion among those working with the legislation, and also leaves more opportunity for drafting or compatibility errors."¹⁵

Ron Gould

2.36 Over 75 separate pieces of primary and secondary legislation (some of which have been amended on several occasions) governed the administration of the elections that took place across the UK in May 2015 (with specific legislation applying in respect of particular provisions for Scotland, Wales and Northern Ireland).

2.37 These acts, regulations, rules, and orders are intended to cover everything including who is responsible for electoral registration and conduct of the elections; the franchise and registration process including IER; the detailed requirements for electoral processes contained in rules and regulations; combination of polls; the responsibilities of parties, candidates and agents; fees and charges for funding the elections; Welsh language provisions; the means for challenging results; and arrangements for polling districts; polling places and polling stations.

2.38 The statutory officers and electoral administrators are, understandably, expected to have a working knowledge of the relevant provisions of all of the legislation relevant to the elections they are delivering. This is becoming increasingly challenging in such a complex legislative environment.

2.39 As mentioned in the previous chapter, the AEA supports the key principle set out by Gould that "Electoral legislation should not be applied to any election held within six months of the new provision coming into force"¹⁶ and yet the legislation set out in the table below was made and came into force for the May 2015 elections when the notice of election was published for local elections by 30 March, and the Writ received for the Parliamentary election on 31 March.

<table>
<thead>
<tr>
<th>Legislation</th>
<th>Summary</th>
<th>Made</th>
<th>Date came into force</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Parliamentary Elections (Welsh Forms) (Amendment) Order 2015</td>
<td>Sets out Welsh versions of certain forms or forms of words for use at Parliamentary elections in Wales</td>
<td>19/03/2015</td>
<td>Day after it was made</td>
</tr>
<tr>
<td>The Local Elections (Principal Areas) (England and Wales) (Amendment) Rule 2015</td>
<td>The two instruments made changes to the form of the ballot paper used at local government and parish council elections in England and Wales by removing numbers against the names of candidates on the ballot paper. They also made some minor corrections to the wording and statutory references on the Candidate’s Consent to Nomination form. The Parishes and Communities instrument required a parish council to notify the Returning Officer by 4pm (instead of noon) on the 19th working day prior to polling day if they wanted poll cards to be issued at the election, to bring this deadline into line with the deadline for the submission of candidates’ nominations at parish council elections</td>
<td>30/01/2015</td>
<td>02/03/2015 but with no effect to polls until after 06/05/2015</td>
</tr>
<tr>
<td>The Local Elections (Parish and Communities) (England and Wales) (Amendment) Rules 2015</td>
<td></td>
<td>30/01/2015</td>
<td>02/03/2015 but with no effect to polls until after 06/05/2015</td>
</tr>
<tr>
<td>The Representation of the People (Ballot Paper) Regulations 2015</td>
<td>Introduced a new form of ballot paper for UK Parliamentary elections. This included the removal of numbers against candidates’ details on the ballot paper</td>
<td>09/03/2015</td>
<td>Day after it was made</td>
</tr>
<tr>
<td>The Parliamentary Elections (Returning Officers’ Charges) Order</td>
<td>Provided details of returning officers’ overall maximum recoverable amounts</td>
<td>26/02/2015</td>
<td>Day after it was made</td>
</tr>
<tr>
<td>The European Parliamentary Elections (Amendment) Regulations 2015</td>
<td>Required EROs to issue a further notice in the period 19 to 28 March 2015 to postal voters whose postal ballot paper was rejected at the European Parliamentary election in May 2014 and who were notified of this immediately following the poll, and who still had a postal vote.</td>
<td>02/03/2015</td>
<td>03/03/2015</td>
</tr>
<tr>
<td>The Representation of the People (Combination of Polls) (England and Wales) (Amendment) Regulations 2015</td>
<td>These two instruments provided that at a combined poll, the counting of parliamentary votes may begin before all other ballot papers have been verified. Previously it would not be possible to complete the parliamentary election count until all other ballot papers for all other polls had been verified.</td>
<td>09/03/2015</td>
<td>07/05/2015</td>
</tr>
<tr>
<td>The Police and Crime Commissioner Elections Order 2015</td>
<td></td>
<td>09/03/2015</td>
<td>07/05/2015</td>
</tr>
</tbody>
</table>
2.40 In addition to the late legislation outlined in the table above, the electoral administration and conduct provisions in the ERA Act were commenced and came into force for the elections held on 7 May 2015 and at future elections:

- Section 14 - extended the UK Parliamentary election timetable from 17 to 25 working days (and to 21 to 27 days for by-elections).
- Section 16 - provided for EROs to produce two additional updates to the register in the run up to an election.
- Section 19 - provided for voters queuing at a polling station at close of poll to be issued with ballot papers and vote despite the time of close of poll having passed.
- Section 20 – emblems – allow jointly nominated candidates to use an emblem on the ballot paper at a UKPGE.
- Section 21 - enabled Police Community Support Officers to enter polling stations.
- Section 22 – EROs to notify postal voters following a poll if their postal vote was rejected due to a problem with one or both of the personal identifiers on the postal voting statement.

2.41 As can be seen with the new legislation prior to the May 2015 elections (which is outlined above) we have gone beyond the point where simply consolidating the legislation will solve the problems inherent in the electoral process. We need a ‘root and branch’ reform and the legislation needs to be properly consolidated. The AEA welcomed the Law Commissions’ Consultation Paper on Electoral Law and their proposal which takes forward work to simplify electoral legislation across the UK to create a single Electoral Administration Act\textsuperscript{17}.

**Recommendations:**

The AEA reiterates the following two recommendations which have been made in previous election reports:

- The UK Government should bring forward a single Electoral Administration Act in accessible language setting out the high-level framework governing electoral registration, elections and referendums in the UK, with the operational detail of registration, absent voting, and elections contained in secondary legislation,

\textsuperscript{17} Law Commission – Electoral Law: A Joint Consultation Paper – Provisional Proposal 2-1
all with the key aim of achieving the simplification and consistency of rules across all electoral administration matters.

- Except in cases of unforeseen emergencies, changes to election law should not be applicable to any elections within a six-month period from the date the legislation comes into effect.

and in addition recommends the following:

- Any polls coinciding in the same area on the same day must be combined, but with an upper limit on the number of polls being allowed to take place on any one day as outlined.

**Accountability and challenge**

2.42 ROs and EROs are accountable to the courts for their conduct of the election. Candidates and agents are accountable to the courts for their conduct in standing for election.

2.43 Parties, candidates and agents also have responsibilities as regards election finance and are regulated by the Electoral Commission in this respect. The comments here do not intend to address any of the election finance requirements currently regulated by the Commission.

2.44 The only provision within the law for addressing grievances and complaints about elections is by presenting an election petition to the Royal Courts of Justice (England and Wales), the Court of Session (Scotland), or the High Court (Northern Ireland). In such a case, the petition is simply aimed at challenging the result of the election. Other than this, there is little provision within the law to deal with the situation of complaints made during the election campaign or about the voting process.

2.45 What this means in practice is that a person eligible to vote or a candidate at the election in question must lodge a petition within 21 days of the Writ being returned for a UKPGE or of the declaration of result for a local government election and stand surety for costs of £5,000 or £2,500 respectively. In order to be successful in petitioning, the petitioner must be able to argue that the outcome of the election was affected. In cases of alleged maladministration, the petitioner must be able to argue that (a) the election was not conducted in accordance with the law, and (b) that the outcome of the election was affected. Once a petition has been properly submitted an election court is convened and proceedings (depending on the complexity of the case) can take several months to resolve before a judgement is delivered.
2.46 For example, a Petition was brought alleging electoral fraud at the mayoral election in Tower Hamlets on 22 May 2014. The judgment was delivered on 23 April 2015, almost one year after the election. The judge declared that the 22 May 2014 election was voided by corrupt and illegal practices and on the ground of general corruption and therefore would have to be re-run (the election was held on 11 June 2015). Allegations against the RO of Tower Hamlets were withdrawn in February 2015 ahead of the Election Court hearing the case in question.

2.47 Another significant case was a Petition brought alleging electoral fraud at the elections in Birmingham on 10 June 2004. The judgment was delivered on 4 April 2005, with the subsequent appeal to the High Court taking place almost one year after the elections. The outcome was that a new election had to be held for the Bordesley Green ward.

2.48 This is unsatisfactory from several viewpoints, e.g. the length of time that this process takes, the cost of taking a case via the election petition route, the unfair advantage provided to those who can afford these costs, the lack of proportionality in either the process or the remedy for dealing with the potential range of complaints, some of which may not have affected/or wish to question the outcome of an election.

2.49 For all of these reasons, the petitions process does not offer an appropriate or proportionate mechanism to assist an elector who has a genuine complaint or has suffered maladministration, or candidate who has a concern about a campaigning issue or a technical breach of the complex rules.

2.50 The Association is aware that at the current time there are six petitions arising out of the elections held in May 2015 - three relating to the UKPGE, two relating to local government principal area elections and one town council election in England.

2.51 In 2010, the AEA suggested a formal complaints system should be put in place which is well understood, publicised and capable of being implemented speedily. It needs to have the following characteristics:

- time limited to the nature of the complaint
- penalties for vexatious or frivolous complaints
- a proportionate and appropriate range of outcomes and penalties arising from decisions
- an appeals process
- a mechanism for referral to the appropriate level of court
suitable powers for the court, including the possibility of disqualification from contesting the election in question and/or from holding public office for a specified term.

2.52 In terms of the present arrangements for election petitions and the difficulties highlighted above, consideration should be given to the establishment of a lower level court to act as a court of first resort, with a simplified process for raising cases to this court. The court would also deal with penalties to be applied arising from the complaints system outlined above. Appeals from decisions of this court could be to the Election Court, as part of the existing elections petitions process dealt with by the High Court.

2.53 A vehicle for achieving this could be to utilise the county court involvement provided in Rule 56 of the Parliamentary Election Rules (with equivalent provision in other election rules) with suitable amendments to accommodate the new system introduced as a result of these recommendations.

2.54 In March 2015, the AEA responded to the Law Commission – *Electoral Law: A Joint Consultation Paper* supporting the following provisional proposals which would if implemented make challenging elections simpler:

- The law governing challenging elections should be set out in primary legislation governing all elections\(^{18}\).
- Legal challenges should be heard in the ordinary court system in the UK, with a single right of appeal on a point of law\(^{19}\).
- Local election petitions in England and Wales should be heard by expert lawyers sitting as deputy judges\(^ {20}\).
- Challenges should be governed by simpler, modern and less formal rules of procedure allowing judges to achieve justice in the case, while having regard to the balance between access and certainty\(^ {21}\).
- ROs should have standing to bring petitions, including a preliminary application to test whether an admitted breach affected the result\(^ {22}\).
- There should be a means of ensuring sufficient representation of the public interest in elections within that judicial process\(^ {23}\).

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\(^{19}\) Law Commission – Electoral Law: A Joint Consultation Paper – Provisional Proposal 13-8
• There should be an informal means of reviewing complaints about elections which do not aim to overturn the result.¹⁴

**Recommendation:**

In addition to supporting the Law Commissions’ proposals outlined above, the AEA reiterates its recommendation from 2010 in that:

• The UK Government should design and implement a clearer and local system of accountability and challenge through the introduction in election law of a formal complaints system as outlined in the Law Commissions’ provisional proposal 13-17.

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3 Timing: elections and combined polls, statutory timetables and legislation

3.1 Elections are structured around different statutory timetables for the various types of elections. The AEA welcomed the Fixed-Term Parliaments Act 2011 which meant that all elections including the UKPGE are now scheduled for a specific date subject to any by-elections. Since the above Act 2011 came into force, ROs knew that there would be a UKPGE on Thursday, 7 May 2015. This meant that they could plan in advance, with that date as the fixed point, the booking of venues, hiring of staff, and enter into contracts with certainty, unlike previous UKPGEs which could be called at any point within the five year period.

"Fixed term Parliament helped with planning as did the extension to the election timetable."

Electoral Services Manager, Wales

"Fixed term Parliaments allowed some flexibility on planning by being confident of the actual polling date. The extended Parliamentary timetable was useful in providing some consistency between the various timetables especially in the advanced dispatch of postal packs."

Consultant, North East and Yorkshire

Timetables

3.2 Section 14 of the Electoral Registration and Administration Act 2013 made provision for lengthening the parliamentary election timetable, both for general election and by-elections. This provision was brought into force on 6 April 2014 and therefore Parliament is now dissolved 25 days before a general election, instead of 17 days. Whilst extending the timetable is welcomed and a move forward, there is still need for further change to the timetable which will be highlighted throughout this report.

"The new extended timetable is one of the most important electoral reforms of the last two decades and one of the most vital changes achieved by the triumvirate of AEA, Cabinet Office and the Electoral Commission and without it there would have been catastrophic service delivery failures. I have no strong feelings on the necessity of a fixed term as the more important issue is the time available to plan an electoral process. The parliamentary timetable reform could be even better if the slight discrepancy between local and national
timetables could be sorted. Software does not automatically and accurately produce an accurate timetable. The reform was vital to get postal votes out but unfortunately is still not long enough for certain overseas electors.”

Head of Electoral Services, London

3.3 Appendix 2 shows the timetable for the UKPGE and the local elections which were held on the same day.

3.4 The layout of the timetable with the red font demonstrates the remaining inconsistencies of the statutory deadline dates between the two elections, which add to the complexity of administering combined polls. The purple font provides additional explanatory information and dates.

Combined polls – timetable complexity

3.5 Combined polls are increasing each year.

3.6 The complexity of some of the combinations for both the administrator and voter goes without saying, but combinations are also challenging because of different election timetables and legislation.

"The combination of all out Borough and Parliamentary was very complex in planning and processing. We still have different deadlines for various notices. With the receipt of the writ on the 31st March Poll Cards did not go out until 1st April which again is a condensed time to allow voters to apply for postal votes etc. We like to send our poll cards out in normal circumstances at least two weeks earlier than this election to allow voters plenty of time."

Electoral Services Manager, South East

"Please, please do not again combine these particular elections as it is an unsustainable combination that invites disaster."

Democratic and Electoral Services Manager, Eastern

"This was about the worst combination known to man! Just glad we've got through it in one piece. :)

Democratic Services Manager, North West
"Worse combination possible, due to high volume of nominations for Local & Parish Elections, Cross Boundary issues & the interest from the public."

Principal Elections Officer, West Midlands

3.7 One of the issues that arose following the combined polls on 7 May is whether parish/town/community council elections should be combined with local and UKPGEs. At the UKPGE in 2010, which was also combined with the polls at local elections, the parish council elections which were due to take place on the same date were deferred by three weeks. This situation needs to be reviewed and deferral considered for the future. However, deferring by only three weeks as in 2010 still places additional burden on voters, electoral administrators and candidates.

“A combination too far! Our printers were clearly overwhelmed by the enormity of the jobs we asked for. If we could have held the Parish Council elections later, it would have been so much better.”

Democratic Services Manager, North West

“The impact of combination on workload is enormous - parish elections being held on the same day as Parliamentary and District Council adds a massive amount of work. Generally parish elections become a 'third class' election because of the priorities for the other two. The scale of the nomination process was also enormous and ensuring that the right people with the right skills and experience are involved is paramount. The change in parliamentary timetable has helped as more events are now concurrent.”

Deputy Acting Returning Officer, North East and Yorkshire

3.8 As can be seen below, the dates for some of the same tasks for each election were different (highlighted in red in the timetable at Appendix 2).

Publication of notice of election:

<table>
<thead>
<tr>
<th>Election Type</th>
<th>Minimum Notice Day</th>
<th>Last Notice Day</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local/Mayoral</td>
<td>Not later than 25 days</td>
<td>Not later than Monday 30 March</td>
</tr>
<tr>
<td>UK Parliamentary General Election</td>
<td>Not later than 22 days 4pm</td>
<td>Not later than 4pm on Thursday 2 April</td>
</tr>
</tbody>
</table>
3.9 It should be noted that some ROs will publish the local elections’ Notice of Election early to allow more time to receive and process the large volume of nomination papers.

3.10 In addition, poll cards for an election cannot be delivered until after the Notice of Election and must be delivered as soon as practical after this date. Having different dates for the Notice of Election led to delays for those wanting to issue combined poll cards which reduce costs and are simpler for the voter.

"Having two different dates for the publication of the notice of elections, this meant poll cards were delayed slightly as we had to wait until 1 April before we could issue a combined card......."

Elections Manager, North East and Yorkshire

Delivery of nomination papers:

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Local/-Mayoral</td>
<td>From the date the time stated on the notice of election until 4pm on the nineteenth day before polling day</td>
<td>On any working day during the hours stated on the notice of election until 4pm on Thursday 9 April</td>
</tr>
<tr>
<td>UK Parliamentary General Election</td>
<td>From the day after the publication of the notice of election until the sixth day after the date of dissolution</td>
<td>Between 10am and 4pm on any working day after publication of notice of election until Thursday 9 April</td>
</tr>
</tbody>
</table>

3.11 It should be noted that some ROs stated the hours of 10 am – 4 pm for the delivery of local nomination papers, so that the times of delivery were the same as the UKPGE.

3.12 As shown in the timetable at Appendix 2, the Notice of Election was published in different months for each election. The register to be used for the checking of nomination papers is the register in force at the time of the publication of the Notice of Election. It follows therefore that local election nomination papers had to be checked against the 2 March 2015 register whilst the UKPGE nominations had to be checked against the 1 April 2015 register. This caused confusion and/or difficulties for candidates, agents and electoral administrators.

"It was a slight hindrance having different timetables for the local and parliamentary elections. For example, having to use
the March register for local nominations and the April one for parliamentary.”

Electoral Services Officer, East Midlands

“The different register dates for borough and parliamentary confused candidates, and candidates were using old registers to complete nominations which caused problems and officer time....”

Senior Elections Officer, South East

“Please never ever combine Parliamentary/District/Parish. We had approx. 600 nomination papers to go through in a very short period of days – with 2 bank holidays in the middle.........”

Electoral Services Officer, South East

“I was not looking forward to the volume of applications of between 800 and 1000 expected applications in person. To minimise this we extended the local nomination period and had a desk set up in reception to undertake informal check and to provide advice which worked very well. EC changed their emblem page which caused a few issues (did it have to happen just before this set of elections!!) and if the emblems change it would have been helpful if they could have produced broadcast updates, as some times you can't move without an email and when you want info all is quiet!!”

Electoral Services Manager, Eastern

“...Close of withdrawals for parishes should be later to allow for co-option. It was ridiculous that parishes had wards with elections and others with vacancies - there is no point. Receipt during the day of nominations for Parliamentary should be the same as Borough.”

Electoral Services and Logistics Manager, Southern

“Change of date for last day to withdraw [candidate’s nomination] stops parishes "arranging" when the election is contested.”

North East and Yorkshire Branch
Publication of statement of persons nominated:

<table>
<thead>
<tr>
<th></th>
<th>Local/Mayoral</th>
<th>UK Parliamentary General Election</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>18 days (4pm)</td>
<td>4pm on Friday 10 April 2015</td>
</tr>
<tr>
<td>If no objections:</td>
<td>If no objections: on 19 days (at 5pm)</td>
<td>5pm on Thursday 9 April</td>
</tr>
<tr>
<td>If objection(s)</td>
<td>If objection(s) are made: not before objection(s) are disposed of but not later than 18 days (4pm)</td>
<td>No later than 4pm on Friday 10 April</td>
</tr>
</tbody>
</table>

3.13 If there are no objections received to the UKPGE nominations, the statement of persons nominated must be published one day before the local/mayoral notice with a time of 5pm and not 4pm as with local/mayoral the following day. For consistency and ease of understanding, it should be on the same day and preferably the latter date to allow sufficient time to check the nominations and proof the notices.

Notice of Poll:

<table>
<thead>
<tr>
<th></th>
<th>Local/Mayoral</th>
<th>UK Parliamentary General Election</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Not later than 6 days</td>
<td>Not later than Tuesday 28 April</td>
</tr>
<tr>
<td>If no objections:</td>
<td>If no objections: on 19 days (at 5pm)</td>
<td>5pm on Thursday 9 April</td>
</tr>
<tr>
<td>If objection(s)</td>
<td>If objection(s) are made: not before objection(s) are disposed of but not later than 18 days (4pm)</td>
<td>No later than 4pm on Friday 10 April</td>
</tr>
</tbody>
</table>

“....This fantastical position of having notices of Poll being produced on the same day as the deadline for the receipt of nominations must be addressed. We must have 24 hours to produce the Notice as a minimum. Particularly where we are dealing with multiple Constituencies and other Polls it places a ridiculously difficult deadline.”

Head of Democratic and Registration Services, Eastern

3.14 For consistency purposes the Notice of Poll for both elections should be published on the same day.
Delivery of return as to election expenses:

<table>
<thead>
<tr>
<th>Election Type</th>
<th>Delivery Details</th>
<th>Date(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>UK Parliamentary General Election/Local/Mayoral</td>
<td>Within 35 calendar days after the date the election result is declared</td>
<td>If result declared on Thursday 7 May: by Thursday 11 June, If result declared on Friday 8 May: by Friday 12 June</td>
</tr>
<tr>
<td>Parish/Community</td>
<td>Within 28 calendar days after polling day</td>
<td>By Thursday 4 June</td>
</tr>
</tbody>
</table>

3.15 For consistency purposes the return of election expenses for parish/community elections should be on the same day as UKPGE/local/mayoral.

3.16 As demonstrated above, the variations in the electoral timetable within combined polls adds to the complexity of administering the elections and could also create confusion for candidates, political parties and the voters.

3.17 The Law Commission in their *Electoral Law: A Joint Consultation Paper* made the following provisional proposal which the AEA fully supports for the reasons outlined above:

“A standard legislative timetable should apply to all UK elections, containing the key milestones in electoral administration, including the deadlines for registration and absent voting.”

3.18 Whilst the extension of the UKPGE timetable has been welcomed, there needs to be a further review and extension of election timetables to allow more time for certain aspects, along with the standardisation of timetables for all elections and polls. The timetable for registration and absent voting and the issues that arose on 7 May 2015 are considered in more detail later in the report.

“Parliamentary timetable needs to be extended further due to the high proportion of overseas electors & postal voting.”

Principal Elections Officer, West Midlands

“Decided to issue Notice of Election for Local election early to allow more time for local nominations - there was no way we could process the 211 local and 61 parliamentary nomination

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papers had we used same timetable. The Easter bank holidays were an issue eating into the timetable. Even with fixed term parliaments, the timetable is too short where there are Bank Holidays - this needs looking at - the candidates struggled too....”

Electoral Services Manager, West Midlands

Recommendations:

- A review of all election/poll timetables should be carried out with a view to extending some aspects, as well as standardising a legislative timetable which should apply to all UK elections, containing the key milestones in electoral administration, including the deadlines for registration and absent voting.
- Subject to the recommendations of the Law Commission as to the maximum number of polls that can be combined, a review should be carried out as to whether the polls at parish/town/community council elections should be combined with polls at a UKPGE and local elections held on the same day.

Welsh Forms Order

3.19 As mentioned briefly in the previous chapter, the Welsh Forms Order was significantly late and only made on 19 March 2015 and laid before Parliament on 23 March 2015.

"The Welsh Forms order was again delayed, and caused quite a bit of stress for my staff....” 

Electoral Services Manager, Wales

"Welsh Forms Order ..... SHAMBLES yet again. This puts Wales at a significant disadvantage over the rest of UK.”

Head of Business Support and Elections, Wales

"Welsh Forms Order very late and once made contained a lot of grammatical errors, which resulted in complaints....”

Electoral Registration Manager/Deputy Returning Officer, Wales

"The fixed term should have meant far better preparation by the Cabinet Office and election claims unit. The Welsh Forms Order was last minute yet again, which delayed printing meant we lost any advantages from the longer time-table......”

Electoral Registration Manager/Deputy Returning Officer, Wales
3.20 The implications of such delays meant that as printers were unable to provide proofs of poll cards until the wording was approved, the delay resulted in late delivery of poll cards, with electors then having less time to arrange a postal vote leading to them possibly being unfairly disenfranchised. One of the Electoral Commission’s performance standards requires ROs to send poll cards out as near to the Notice of Election as possible.

3.21 It was understood that arrangements had been put in place this year so that both the English and Welsh Forms Orders were being prepared at the same time, although advice provided by the Cabinet Office was that the Welsh Forms Order could not be approved until the English Forms had previously been approved. However, despite the English Forms Order being approved, there were significant delays with the Welsh Forms Order similarly to the Police and Crime Commission Elections in 2012.

3.22 As a result a letter was sent from two Welsh Acting ROs to the Welsh Government Minister for Public Services asking the Minister to intervene on their behalf to resolve the issue without further delay and also to seek a commitment from the UK Government that, in future, the Welsh Forms Order is laid either at the same time as its English equivalent or within seven days. The letter was also forwarded to the Welsh Language Commissioner who referred to Section 26 of the Welsh Language Act 1993 in their response and highlighted the following:

“...It's noted that Section 26 does not, in any way, ‘prevent Ministers from including the Welsh and the English in the same act at the same time”

Meilyr Emrys, on behalf of the Welsh Language Commissioner

3.23 In addition following the publication of the Parliamentary Elections (Welsh Forms) (Amendment) Order 2015 Welsh electoral administrators had further difficulties in relation to the print production of the ballot papers, as there was no actual form for the front of the ballot paper layout unlike the English version.

".....As you can see from the Order, Rule 3 relates to the instructions for the Welsh wording on the front of the Ballot

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26 Letter dated 20/04/2015 from Meilyr Emrys on behalf of the Welsh Language Commissioner to Rhian Headon, Equalities and Engagement Officer, Neath Port Talbot County Borough Council

27 Parliamentary Elections (Welsh Forms) (Amendment) Order 2015
Paper, however no actual Form of Front of Ballot Paper template is provided. It is instead left to each individual ARO to ensure the correct English and Welsh wording is included on the front of the ballot paper and also to adjust the formatting to accommodate the additional text. No guidance or instructions are given. However, Schedule 2 of the same WFO, does prescribe a template for the Form of Back of Ballot Paper. To note, this is how all Welsh Forms Order have been prepared for previous Parliamentary Elections so the Cabinet Office have not drafted the legislation any differently. However due to the fact that the design of the ballot paper changed quite dramatically this year it would have been really helpful to have had a prescribed front of ballot paper template to follow to ensure consistency of approach across the Country. In addition, you could also argue once again that the Welsh Language is not being treated equally with the English Language and does not comply with the principle established in the Welsh Language (Wales) Measure 2011\textsuperscript{28} that the Welsh Language should not be treated less favourably than the English. In contrast, the Representation of the People (Ballot Paper) Regulations 2015\textsuperscript{29} does of course provide an English language Form of Front of Ballot Paper template and Form of Back of Ballot Paper template within Schedule 1.”

**Electoral & Democratic Services Manager, Wales**

3.24 It was also noted that the Cabinet Office do not operate a Welsh Language Policy.

“...the Cabinet Office, who are of course responsible for drafting the Welsh Forms Order and preparing the Welsh Language templates do not operate a Welsh Language Policy, as pointed out by the Welsh Language Commissioner in her 20 April correspondence.”

**Electoral & Democratic Services Manager, Wales**

**Recommendation:**

The Welsh Forms Order should either be included in the same legislation as the English forms or be laid at the same time as its English equivalent. The Order should contain a Welsh language

\textsuperscript{28} [Welsh Language (Wales) Measure 2011](#)

\textsuperscript{29} [Representation of the People (Ballot Paper) Regulations 2015](#)
Form of Front of Ballot Paper template and Form of Back of Ballot Paper template in the future.

**Late Legislation and Guidance**

3.25 As mentioned in the previous chapter, the AEA supports the key principle set out by Gould “Electoral legislation should not be applied to any election held within six months of the new provision coming into force.”

“As suggested by [Ron] Gould, legislation should be in place at least 6 months before a major election. Late legislation and supporting guidance increases the risks of problems affecting the election.”

*Electoral Services Officer, South West*

3.26 Despite the date of the UKPGE being known well in advance, legislation and guidance was again late. The lateness of the Welsh Forms Order along with other legislation for the elections on 7 May 2015 (outlined in the table in the previous chapter) demonstrates that the Gould six months’ principle was not met. In addition, there were numerous issues (reported below) in relation to late guidance that was issued by the Electoral Commission or the Cabinet Office. Further details in relation to each issue will be covered in the relevant chapter of this report.

**Fees and charges:**

“A fixed term Parliament is helpful in terms of planning and this should mean that all stakeholders are able to provide the required guidance in an appropriate timescale. This was not the case with the guidance on Fees and Charges.”

*Deputy Acting Returning Officer, North East and Yorkshire*

“Disappointing that the fees and charges guidance came so late when preparations and decision making processes were already well under way. It is very difficult trying to secure resources to run an election when we have no idea what can/cannot be claimed and the amounts that can be paid are unknown. The fees and charges forms for submitting claims were received the day after the election. Therefore any early preparation of these was out of the question.”

*Democratic Services Manager, East Midlands*

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“....On Friday 8th May, we received claim forms for the Parliamentary - this is far too late if we had to do something specific or different that we were not aware of prior to the election.”

Electoral Services Manager, Eastern

“Fees and charges order was very late once again.”

Electoral Services Manager, South East

“The fees & charges guidance came through far too late and at a time when we had already committed to contractors.”

Electoral Services Manager, South West

Ballot paper changes:

“The Statutory Instruments re the Ballot Paper Layout were issued far too late. There is no reason, particularly in a fixed term parliament, for this to be coming out a matter of weeks before the poll.”

Election Office Manager, Scotland and Northern Ireland

“As usual we were waiting for last minute changes to legislation - numbers on ballot papers, fees and charges etc.”

Electoral Services Manager, London

“Not brilliant timeliness, especially for the change in law regarding numbering of ballot papers...”

Principal Elections Officer, East Midlands

“Too late as ever. There should be no changes within the last 6 months to allow us to properly plan for the election. As ever it never happens. As for fees and charges - far too late. I received the advance just 3 weeks from election day - past the point that I was paying bills for poll card delivery etc. In addition despite submitting the 2014 accounts before the deadline date, I have received numerous requests for information from the claims unit and Cabinet Office after the year end.”

Electoral Services Manager, London
Candidates and polling staff resources:

"....Unfortunately delays with updates to EC resources (candidate’s briefings and polling training) and nomination papers hindered planning and limited flexibility for delivering innovative and accurate sessions."

Democratic Services Manager/Deputy Returning Officer, North East and Yorkshire

Poll card guidance:

"......Combined poll card guidance from EC way too late - templates designed and signed off before it arrived."

Electoral Services Manager, West Midlands

"The inclusion of the additional wording on poll card for carried forward electors was a very late amendment. This lead to a delay in proofing the poll cards, fortunately it did not impact on delivery."

Elections Manager, North East and Yorkshire

Party emblems

"...Too late confirmation of ballot changes. Much too late confirmation of logos being updated and not communicated effectively with RO/EROs resulting in poor communication to printers."

Supplier – Sales Director, Eastern

".....The ability of parties to be able to change logos right up to the close of nominations (?) should be addressed. We download the latest logos for all the anticipated parties that will be standing when we set up an election. The last thing we need to have to be doing is to be going back to the EC site to check logos when we are trying to submit candidate data at close of nominations."

Electoral Services Manager, North West

"....Electoral Commission did not adequately communicate changes to political parties logos...”

Electoral Services Manager, Eastern
Commonly used names

"...Thought the EC advice on Commonly used names caused last minute confusion, this should have been highlighted well before Christmas and certainly when EC met with political parties as it was left to us administrators to be used as a sound board for candidates frustration on finding out they could not be known as their middle name....”

Electoral Services Manager, Wales

Overseas postal vote despatch dates

".....Also the Cabinet Office issuing last dates for posting overseas votes, almost at the point they were due out was less than helpful. The printing processes had been put in place long before this.”

Election Office Manager, Scotland and Northern Ireland

European Parliamentary Election Accounts

3.27 In addition to the issues already outlined in this chapter, an issue arose in the run up to the elections which could have been avoided and which added to the pressures of already stretched electoral services teams.

3.28 The previous chapter outlined the new arrangements for the submission of election accounts whereby ROs now fall into three categories: plain accounts, light touch and full scrutiny. The new arrangements reduce the amount of work required in preparing and submitting election accounts in some instances, although any RO may be required to submit full accounts along with receipts and vouchers at a later stage to the National Audit Office for auditing purposes. So, in theory, those ROs under the category of plain and light touch still need to prepare all the paperwork.

3.29 ROs had to submit their accounts for the European Parliamentary Elections held in June 2014 within six months of the election in accordance with their scrutiny category. During week commencing 2 March 2015, the Cabinet Office emailed several ROs (who had submitted plain or light touch accounts) requesting copies of their European Parliamentary election accounts, receipts and vouchers, within one week, for scrutiny by the National Audit Office. Timing was not ideal bearing in mind that the election timetables were starting that same month for the major elections in May.
“Last week we received an email from the Cabinet Office, requesting copies of our election accounts and all vouchers for the NAO - and giving a week’s notice. We have since been chased on this, despite our response saying that the timescale was too tight and it being so close to major elections.

We understand that the NAO needs this information, and we have no objection to providing it, however they should have made it clear to us either at the end of last year /the beginning of this year that they would require this information from us - and give us a realistic deadline date (perhaps of the end of February).”

Electoral Services Manager, Southern

“W/c 2 March I was asked to submit the supporting evidence for my EU election claim. We had been selected to complete plain accounts, which I did and was one of the first to submit them. I understand and fully appreciate it was always the case we might be asked to produce supporting evidence. However, I feel the timing of this request really does show how little the powers that be appreciate what we have to deal with this year - and to give us just one week’s notice to provide this at such a manic time.”

Electoral Services Manager, South West

Recommendation:

The National Audit Office should give a minimum of two months’ notice to a RO when requesting copies of full election accounts and receipts (with the whole of that period finishing earlier than the last day for publishing the notice of election for a pending election).
4 Planning, management and performance

4.1 Because of the Fixed-Term Parliaments Act 2011, all stakeholders knew that the next UKPGE would be held on Thursday, 7 May 2015. This meant that advanced planning and arrangements could be made and put in place with some certainty, unlike previous UKPGEs.

4.2 The AEA advocates a project management approach to running elections. Consistent reports received by administrators stated that knowing the date of the UKPGE assisted them with the planning. Planning and arrangements could start early, although hindered by the introduction of IER which had an impact on staffing and other resources available.

"The certainty of the election was hugely advantageous in planning (we could start in October)....."

Electoral Services Manager, Eastern

"Fixed term is better for election administrators otherwise you are always guessing when it might happen. At least now you can plan ahead more i.e. booking of premises, staff appts....."

Constituency Lead, South West

"We did a lot of extra work (HNL, council tax mailing etc) to try and mitigate so I don't think we were unduly affected on the day by an inaccurate register. However, the staff time involved in undertaking these activities had a knock-on effect in planning for the election. Everything was being prepped far later than it should have been and this caused a lot of pressure for the core team."

Senior Electoral Services Officer, South East

Working across local authority boundaries

4.3 Coordinating across local authority boundaries in UK parliamentary constituencies comprising more than one local authority area or part thereof, was a key factor that added to the complexity of the elections in areas where this occurred. It impacted on all aspects of the planning and management of resources and processes through to customer service. There are 183 cross boundary constituencies.

4.4 There were very mixed experiences of this co-ordination, ranging from the very positive to the extremely negative, with the common denominators being the quality of working relationships, planning and compatibility of data and software. The issue of data transfer, compatibility, timeliness and quality of data featured in numerous
responses, although it would appear solutions to the problems that arose were found by software suppliers and/or local authority IT and electoral staff.

"We all work well together and had a comprehensive cross boundary plan and cross RO agreements. However working on three incompatible software systems with complex cross boundary give and takes, including Parishes for the first time proved to be almost unworkable.”

Electoral Services Manager, South East

"The issue with cross boundaries was challenging for ERO's dealing with different EMS and printers.”

Administration Manager, Scotland and Northern Ireland

"Cross boundary nightmares – although a protocol in place with neighbouring authority in which it was agreed to do a combined poll card, we’ve just discovered they had our data as scheduled but failed to mention our local elections as agreed, only referring to the parliamentary election in the cross boundary area…”

Electoral Services Manager, West Midlands

"We give away and take on so had to work to and provide data for our own printing, our give away area and bring in data for our take on area. We experienced difficulties with having several sets of data and different printers requesting deletion and re-submission of parts of but not all of our area. It was near impossible and very stressful keeping track of it all and I felt very out of control at certain times…”

Elections Manager, North West

"Cross boundary planning is essential but even when undertaken it’s difficult to get everything correct due to different working practices. We had issues surrounding the transfer of ERO data for postal votes issuing. The understanding of which data files needed transferring between different EMS suppliers was poor.”

Elections & Information Manager, Southern
**Impact on voters of cross-boundary constituencies**

4.5 Administrative issues impacting on voters included confusion for voters in relation to which local authority to contact when they had a query, UKPGE postal vote packs being sent out at different times to local postal votes and replacement postal vote issues.

"Cross-boundary work was difficult this year, despite working closely with colleagues across the boundary. One neighbour sent their parliamentary postal packs out after our locals to the same electors (in some cases 2 days, in others a week later) and forwarded the resulting complaints to us to deal with! As a result we had some very unhappy electors for a while."

*Deputy Acting Returning Officer, South East*

"Nightmare. I use the same software as my neighbouring authority and take 23,000 electors from them for this election. Electors simply don't understand what this is about. The need to contact their home authority for registration/postal application issues but me for election issues is a mess. This is particularly the case for emergency proxies and postal pack replacements."

*Electoral Services Manager, London*

"Very confusing for voters with postal votes, especially when sending out at different times, and who they should contact."

*Elections Manager, Southern*

4.6 Cross-boundary working needs to be considered further in the light of the experiences of its operation in 2015 and 2010, both where it worked well and where it didn’t and the reasons in each case. The emphasis should be on seeking legal or guidance solutions, to ensure that a more joined-up customer focused delivery is achievable.

4.7 The proposed review of UK parliamentary constituency boundaries between February 2016 and February 2018 will undoubtedly bring the two issues of coordination and coterminosity into sharp focus. This is especially because of the impact of IER and subject to the end of IER transition, leading to a definite need to have solutions in place well before the next General Election.
**Procurement**

4.8 ROs are independent in law, but are based within local authorities. In delivering their functions, ROs draw on the resources of the local authority. As a result, the independence of the RO in conducting the election can be compromised by the procedures and requirements of local authority policies and practice particularly with regard to staffing, financial and procurement issues.

4.9 Administrators report that they are increasingly being required to adhere to local authority procurement processes with, in some cases, the costs of procurement administration being recharged to the RO. These processes do not always result in a positive outcome in terms of securing value-for-money, of identifying suppliers with relevant experience of delivering election stationery or other services, or that can deliver effectively within the very tight timescales.

"My print supplier has worked above and beyond to make sure that right voter got the right piece of paper at the right time. Very, very difficult to manage this year. Required a level of technical skill (with the system data) that some administrators may not have had. My printer tells me that this has been the most complex election that he has ever run. I have never seen him, and his team, so stressed. He appears to have come out of it largely unscathed - unlike some of the printers and administrators. I fear for the future when we have to look again at contracts / procurement. He is probably not the cheapest printer (and again, fees may not cover all of the costs) but he has been superb."

*Electoral Services Officer, North East and Yorkshire*

**Outsourcing and managing contractors**

4.10 Over the years there has been an increasing reliance on outsourcing parts of the electoral process to private contractors, mainly to produce the increasing numbers of postal vote packs. In addition, printers are contracted to produce poll cards and ballot papers for polling stations. However, some authorities continue to produce these central election materials in-house both because they have the capacity to do it and/or because they prefer to retain greater control of these processes.

"We use our own internal printers and their service was excellent."

*Electoral Services Manager, Wales*
"We have used the same supplier for postal voting packs for a number of years, however they were recently taken over and their performance was poor. I am now planning on taking this back in-house at future elections."

Electoral Registration Manager, Wales

4.11 Administrators reported a mixed picture regarding the success or otherwise of outsourcing at the elections in May, from that which went well to examples of scheduled slippage, poor quality, overstretched suppliers leading to errors being made. There are a limited number of print suppliers in the electoral industry and the introduction of IER along with combined polls has significantly impacted on supplier capacity.

"Outsourcing of printing went well - we use the same companies as previously and have contracts in place. Both our main suppliers are very flexible and supportive."

Deputy ARO, South East

"Big issue with print [supplier] ..... I think they took on too much. Our postal vote issue was pushed back from 17th to 22nd April (having advertised earlier delivery on postal poll card) as printing issues around country put back ballot paper printing. Our 2 constituencies were fine so unsure why we were put back. The emblem changes caused a few issues I think for Lib Dems and Greens - both late changes. In addition we then had some of another [local authority] postals delivered to us in our outer envelopes - very poor from a usually very good company!!!"

Head of Electoral & Member Services, London

"Having talked to colleagues it seems to me that all printers had capacity issues and have concerns that these will only get worse. Ours barely kept to schedules and I had to cancel a postal vote issuing session at short notice."

Democratic Services Manager, West Midlands

"Printers struggled with timelines between close of nominations - ballot paper proofs - checking and then
printing. 2nd issue postal votes and poll cards was not checked as the printers schedule was too tight and we were lucky there were no issues.”  

Elections Manager, Eastern

“Last minute change of supplier of postal vote packs as the usual supplier has pulled out from the ability to produce a triple combined pack – they won’t wait to see what parishes are contested. The new supplier can accommodate this. A big change so close to the election. Drawing up of a new contract etc, big pain in the neck!”

Electoral Services Manager, South East

“There was massive pressure on the supply industry – we survived due to their immense determination and commitment, which mirrored our own. But 2016 is actually more demanding.”

Head of Electoral Services, London

“I think that the printers did well considering that I think many administrators may have underestimated their requirements or found they had subsequent issues that needed resolving at a later stage given the complexity of a combination poll. This inevitably had a detrimental impact on the printers ability to supply everything everyone wanted to ideal timescales. Moving forward I would like to see a government approved print framework developed of all printers that we can consider using for electoral purposes. This would also provide contingency should a printer fail to produce what is required at short notice as a complete list of likely suitable alternatives would be easily accessible.”

Elections and Land Charges Team Leader, Eastern

“Dreadful experience this year. The Printers seemed to have bitten off more than they could chew and delivery of the PVs was very late. Postal packs for Parishes were a muddle, with the wrong parish ward names on them. Quality of the papers was inconsistent - in the counting trays the yellow ones ranged from bright yellow to something verging on green! The green ones were green - grey/green. Papers were smudged
and dirty looking. We’re used to a very high standard of printing from our supplier so this was a shock.”

Democratic Services Manager, North West

“The print service we received this year was nowhere near the standard we normally have, again I think this is a capacity issue.”

Head of Election Services, East Midlands

“We have long term contracts in place that worked for this election. We had a sound production schedule with contingencies that we ended up using. The quality of the printers was not as good as usual and we will be reviewing the reasons for this. Listening to their feedback, the demands of combined elections brought capacity issues that were much more difficult to manage.”

Head of Democratic Services/DRO, South East

“We think our printers were as usual fantastic but maybe pushed a little as one or two minor mistakes were found which is unusual.”

Electoral and Licensing Officer, North West

“Our print supplier was clearly working at full capacity to deliver this election. Whilst they delivered everything that was asked from them, our second dispatch of postal votes to people who applied close to the deadline was sent out 5 days later than intended resulting in a number of people being unable to return their postal votes. There were also issues printing ballot papers that had a large number of candidates.”

Elections Officer, East Midlands

“We think our printer struggled with the demand on them from so many councils having complex issues and double / triple elections. There were delays on getting proofs and some postal votes had to go out early. But generally, cannot complain giving the scale of the election.”

Elections Manager, North East and Yorkshire
**Recommendation**

The UK Government and/or the Electoral Commission be asked to investigate the possibility of establishing a national framework of electoral print suppliers in the interests of securing efficiency, resilience and operational certainty for future elections.

**Working with Royal Mail**

4.12 There were extremely different experiences again this year regarding the performance of Royal Mail, with feedback in relation to performance ranging from excellent to poor, along with improvements from previous elections.

"The best service we have ever had from Royal Mail."

*Principal Elections Officer, West Midlands*

"Worse performance for a long time ......."

*Electoral Services Officer, North East*

4.13 The performance issues attracting most concern were the loss of poll cards and postal votes by Royal Mail, late delivery of the same, failures in relation to ‘pre-sortation’, and different Royal Mail contacts for various aspects and their capacity.

"A good service this year in general. A few postal votes and poll cards not received."

*Senior Electoral Services Officer, South East*

"I have concerns that royal mail do not prioritise postal vote delivery and pockets of our borough seem to be late in receiving postal ballot packs. The plans made by royal mail for the return and delivery of our postal votes are poor. We planned and paid for a timed, ward sorted delivery but once again, they could not deliver on time. This situation arose in 2014 and we highlighted it as a concern for the Parliamentary election in 2015. When the postals did arrive, they were not pre-sorted. In order to ensure we received postal votes on time for opening we had to cancel the ward sortation and do this ourselves in the office."

*Electoral Services Manager, Eastern*
“Numerous complaints regarding non-delivery of postal votes. 19 Postal Votes delivered to another authority 60 miles away on polling day.”

Electoral Registration Manager, Wales

Electoral integrity

4.14 International observers have commented in the past that the electoral system in Great Britain is based on trust and is therefore vulnerable to electoral fraud. Over the years, changes have been made in legislation to reduce the potential for electoral fraud:

Postal votes:

4.15 Applications for a postal vote require the person’s date of birth and signature. This data is then checked when the postal voting statement is returned with the postal ballot paper.

Registration:

4.16 Last year IER was introduced which requires the verification of all electors. The date of birth and national insurance number must be supplied when registering to vote and then verified before a person is registered.

4.17 However there still remains other areas of concern within the electoral system:

Registration in more than one electoral area:

4.18 The AEA has expressed concern in previous reports about the current provision within the law for some people to be registered in more than one place. The law regarding ‘residency’ is not clear and leaves EROs to exercise their judgement in any particular case. For example, the ability for people to register at a ‘second home’ and the lack of a firm definition for what constitutes a ‘second home’.

4.19 Although people can register in more than one electoral area, they should not vote more than once at a UKPGE. To do so is an offence. However, there is no way of knowing how many people, unwittingly or otherwise, have voted more than once at the General Election.

4.20 In March 2015 the AEA responded as follows to the following question in the Law Commission – Electoral Law: A Joint Consultation Paper:
"Should the law lay down the factors to be considered by registration officers when registering an elector at a second residence?"

Yes. With the factors included in legislation, this would make it clearer for the registration officer when determining applications from electors wishing to register at a second residence. Option 1 on page 55 appears to include the relevant factors that should be considered in relation to second residency."

Identifying voters:

4.21 International observers continue to question the lack of any requirement to produce identification at the point of voting in-person at a polling station. It remains a potential vulnerability in the electoral process in Great Britain. In Northern Ireland, voters are required to produce pictorial identification at the polling station.

"Apart from names and addresses of voters, voter lists currently do not contain any personal identifiers which could help distinguish voters. In addition, voters are not obliged to present any identification to be able to vote."

OSCE / ODIHR Needs Assessment Mission, 2010

4.22 The AEA remains open to debating this issue further.

Postal Vote Waivers:

4.23 Where an applicant for an absent vote is unable to provide a signature, they may request that the ERO waive this requirement. The law does not set out how EROs may satisfy themselves that the applicant’s request is genuine and that they are ‘unable to provide a signature or a consistent signature due to any disability or inability to read or write’.

4.24 Guidance issued by the Electoral Commission offers, as a practical solution, a declaration by the person assisting the applicant that the elector in question meets the above criteria.

4.25 Whilst it is absolutely right that people with a disability are supported to apply for the means of voting which suits them best within the current provisions, the lack of a statutory declaration

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31 Law Commission – Electoral Law: A Joint Consultation Paper – Question 4-4
32 OSCE / ODIHR Needs Assessment Mission Report
means that the waiver continues to present a potential risk to the integrity of the process.

4.26 In March 2015, the AEA responded to the Law Commission – Electoral Law: A Joint Consultation Paper fully supporting the following provisional proposal and also suggested that the attestation should be extended to a health professional, including a carer, to enable all electors who might require a waiver to be able to apply for one:

Requests for a waiver of the requirement to provide a signature as a personal identifier should be attested, as proxy applications currently must be.33

Activity by candidates, agents and political party workers:

4.27 The following reports were received in relation to the postal voting code of conduct:

"....only 30% returned a form issued by the Chief Constable and myself confirming that they would abide by the Code of Conduct."

Electoral Registration & Returning Officer, Southern

"[x party] postal vote forms – concerns raised when I noticed 99% of the forms were coming from the party office, not the electors. Why was this? Checked with colleagues to find the same thing happening. Covering letter stated councils address was given, but these were electors who chose to return them to us. Mentions code of conduct etc. Closer look at the form reveals they are giving out Freepost return envelopes with the PARTY address on if for the electors to return the form to them. The elector then has the choice of paying for, as well as finding and addressing an envelope, to return it direct to the ERO, or simply putting it in the provided freepost envelope and sending it to the party. It is very obvious which the elector would prefer to do, and IS doing based on experience. Code of Conduct point 15 states ‘Because of the risk of suspicions that the application may be altered and the risk of the application form being delayed or lost in transit, the local Electoral Registration Officer’s address should be the preferred address given for the return of application forms.’ Our address is given on the form, but they are clearly influencing voters to return them directly to them by providing the envelope. Why are they not putting our address on the return envelope? They can put it on the form.

In my opinion they are in breach of the code of conduct and will be talking to the EC later today.”

Elections Officer, Eastern

4.28 The issue of tellers continues to cause difficulties with administrators expressing concern about the potential for and actual intimidation to voters.

“Tellers were still a problem on a number of stations and electors objected to them being there and asking questions they found intrusive.”

Elections Manager, North West

4.29 In both cases, the formalising of roles and responsibilities in legislation is seen as likely to be more effective in ensuring integrity than the current reliance on voluntary codes. This would provide certainty as to what is and is not acceptable behaviour and practice for all stakeholders including EROs, ROs, party workers and voters.

Recommendations:

• The UK Government should review current legislation and provide further clarification in legislation in relation to second homes as outlined in the Law Commissions’ consultation paper.
• The UK Government should amend the legislation to require that applicants for postal votes who request a waiver must have their application attested in line with current arrangements for proxy applications, but with the attestation extended to a health professional, including a carer.
• The UK Government should look to formalise the roles and responsibilities in legislation in relation to tellers and the postal vote code of conduct, so as to be more effective in ensuring integrity.

Electoral Fraud Reduction and Prevention

4.30 Additional funding of £½ million was provided by the Cabinet Office and shared between 17 local authorities identified as at risk in relation to electoral fraud. The funding was specifically for electoral fraud reduction and prevention initiatives before the elections in May. Whilst notification of the additional funding was late, local authorities welcomed the funding and were able to make use of the additional funding with the following reports being received.

“This funding allowed us to better support those areas where the potential for our integrity could be brought into question. Funding was spent on additional police resource, training of our Neighbourhood Officers, provision of guidance leaflets on
keeping your vote safe, security arrangements at the count venue and development of a whistleblowing online reporting form which was available on a news feed from our website. This gave greater confidence in the integrity of our election processes.”

Electoral Services Manager, East Midlands

“The extra funding allowed us to pay for additional police support. Polling Station Inspectors were accompanied by Police Officers throughout the day, which given the number of allegations and problems at polling stations was a God Send. We also used Facebook and Twitter.” encouraging reports of any suspicious activity and raising the profile of what is and is not allowed throughout the process.”

Electoral Services Manager, Southern
5 Individual Electoral Registration Transition

5.1 Individual Electoral Registration (IER) was introduced on 10 June 2014 in England and Wales and on 19 September 2014 in Scotland. It is one of the most significant changes in electoral registration and instead of the ‘head of household’ completing a registration form on behalf of all members of the household, individuals are now required to register to vote individually.

5.2 The introduction of IER has seen the introduction of online registration whereby members of the public provide their name, address, date of birth and National Insurance number whilst registering online at www.gov.uk/register-to-vote. Alternatively, they can register by completing a paper application form and returning it to their local authority.

5.3 As part of the transition to IER in the summer of 2014, all existing elector details were checked against existing government records during the Confirmation Dry Run (CDR) (average 78% DWP match, 7% local authority data matching if carried out). Those electors that matched were automatically transferred to the new register without having to do anything. Those that did not match and were not transferred automatically were invited to register. Electors who did not respond to the initial invite were sent reminders and canvassed in person to encourage them to register individually. A full annual household canvass was not carried out during the autumn of 2014 as it had been in previous years. A revised register was published on 1 December 2014 and any electors who had not matched or registered individually were carried forward and were able to vote at the UKPGE on 7 May 2015. However they were not entitled to an absent vote if not IER registered.

5.4 At the start of IER, the short timescale in implementation impacted with significant software issues in relation to Electoral Management Systems (EMS). These were resolved gradually as they were identified. There are still some software functionality issues, along with improvements being identified by users, which are being resolved or implemented over time.

"Registration software suppliers still not delivering on expectations or needs of ERO's.”

Scotland and Northern Ireland Branch
**Accuracy of the register**

5.5 The Electoral Commission published a report in February 2015 which highlighted that there were 920,000 fewer entries (2% decrease) compared with registers published in February/March 2014 following the 2013 canvass.  

5.6 The Electoral Commission reported that the likely decrease was caused by the lack of a full household canvass during the autumn of 2014.

"We have a very big annual churn - so really needed to have a canvass"

*Deputy Returning Officer, London*

"Our register on 1 December proved to be very out of date. Had we not done the HNL in February we would have had to deal with far more disgruntled people who were unable to vote on 7 May. We have never received so many phone calls ahead of an election as we did this year. There was also the added complication of red electors and those from whom we were awaiting evidence…“

*Electoral Services Manager, South West*

"…..The lack of household canvass meant thousands on home movers were not captured during 2014. Without the HNL exercise in Feb 2015 the quality of the register would have been dreadful. We added in excess of 11,000 electors between 1 Dec and election day. “

*Electoral Services Manager, North West*

**Data mining**

5.7 There were a few local authorities who reported that they had actively carried out data mining and questioned whether there was a need to have an annual canvass in the future.

“We decided to undertake data-mining activity during the summer/autumn and this helped. However, the decision to introduce IER before a General Election and without a full canvass was risky. The EMS is perhaps the best (or worst) example of where the short timescale caused serious issues, many of which have not been fully resolved. The decision to

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fund the HNL process was helpful and this exercise alongside other activities greatly improved registration rates.”

Electoral Services Manager, Southern

"Less than I had expected and by 28 April I was very happy that we had a complete and accurate register. I firmly believe that the current household canvass can and really should go. It causes more problems than it solves. We used data mining via various internal sources since June 2014 identifying over 35,000 people. We delivered household notification letters twice (December and late Feb). We canvassed existing and pending electors in Oct-Nov. We canvassed pending’s in Jan-Feb and again in March-April. We added over 21000 new electors between 1 Dec 2015 and election deadline. Number of complaints on day or since from people not being registered to vote was minimal and in line with previous elections and everyone we spoke to accepted that they had received our correspondence and had failed to respond.”

Head of Registration and Electoral Services, London

"[We were] 'lucky' as we had two by-elections, one in October and one in December 2014 and we used these as opportunities to ensure our register was accurate, as well as following the IER legislation. I genuinely believe that we had systems in place which actively sought out electors and encouraged them to register through utilising council tax database. The [x] party commented positively on the number of additions and changes to our register and although I have no particular evidence, the number of calls following the distribution of poll cards seemed to be minimal.”

Electoral Services Manager, Eastern

Home mover, care homes, students and attainers

5.8 The key challenges identified were home movers, those in care homes, students and attainers as they have to register individually under IER. This was confirmed with the following reports received:

"Evidence and attestation is almost impossible to find for elderly people in houses of multiple occupation. Managers of homes do NOT have access to their residents NINO, the residents do not have utility bills, don't drive or have passports due to their age, and as attestors can only attest for 2 residents this is very difficult to satisfy the legislation."
In the end some care managers just gave up trying to get the residents registered in time to vote.”

Elections Officer, North East and Yorkshire

"Care homes struggled to get to grips with IER and the process evolved from insisting we needed Nino or evidence, but faced with no passports and no driving licences and minimal documents if no family close, we got guidance later which eased the issue a bit. However it meant a lot of electors pending at care homes who couldn't have a postal vote either....”

Electoral Services Officer, Eastern

"We did a lot of work with Nursing Homes and this proved very successful and we have since built up a relationship with Persons in Charge that was not there before IER. However very little success with students at our University, no contact from Student Union. Mini Canvass was a huge success and Jan/Feb prior to an election every year.”

Electoral Services Manager, Wales

"We dropped 9,000 electors, mainly students. Also it became apparent that we also dropped the number of young attainers - 16/17 year olds. This was because for the majority of households who confirmed or were locally data matched they had no Household form to tell us of their 16/17 year olds.”

Electoral Services Manager, London

5.9 The registration of students and care homes under IER is extremely difficult under current legislative procedures and has resulted in far fewer students and care home residents being registered. A review of how these two groups can be registered more easily should be undertaken, with consideration being given to allowing EROs to directly register people at institutions.

Recommendation:

The UK Government should review the registration of students and care homes under IER, with a view to making legislative changes to allow EROs to directly register people at "institutions".
Outstanding invitations to register

5.10 The implications for 2015 prior to the UKPGE were that there were outstanding “Invitations to Register” following the return of the “Household Enquiry Form” as electors are no longer registered directly from a household form. There were also the key challenges of registering the hard to reach groups already outlined.

".....The HEF's - those properties that completed and returned them then ignored the ITR's - why - well they had already told us they were there so why do they need to fill in another form? So yes the register in my opinion was most likely quite inaccurate on 1 December - but never mind as everyone went on-line in the 3 weeks before the election so most were able to vote on 7 May - fab."

Electoral Services Officer & DRO, South East

Household notification letter

5.11 The Cabinet Office provided additional funding to local authorities for maximising registration which was used for outreach work or a household notification letter. The letters were sent out at the beginning of 2015 confirming who was registered at each address.

5.12 The AEA responded to the Political and Constitutional Reform Committee’s invitation for views on Voter Engagement in January 2015 supporting the request for the Government to look favourably on requests for additional funding to EROs to support their work in maintaining and enhancing the levels of electoral registration. Whilst the majority of reports received confirmed that electoral administrators felt that their register was out of date at publication, the household notification letter (HNL) had proved invaluable in making the register as accurate as possible in time for the UKPGE.

"The number of electors didn't drop significantly, however the accuracy of the register was questionable. Given the forthcoming Parliamentary election it was necessary to undertake the "Household Notification" exercise at the beginning of the year. This meant that the Electoral Services office were yet again working under pressure with the need to

35 AEA Response to the Political and Constitutional Reform Committee’s invitation for views on Voter Engagement Paragraph 17
meet deadlines and start the initial preparation work for the elections.”

Electoral Services Manager, Southern

"Reduction in electorate by 3,000. Household notification letter was done in February 2015 to overcome any missed electors. Glad we did this, boosted the electorate by another 1,000 and improved accuracy before poll cards went out. Very good exercise worth spending the maximising registration funding on (for which I bid for extra funding and got it).”

Elections Manager, North East and Yorkshire

"HNL issued to all households, felt this really helped pull up the accuracy rate of the register and helped address some of our concerns over the accuracy. We worked with local university on a number of initiatives. Worked with local disability groups and with Private Landlords. We had a special initiative for care homes setting up a dedicated task force to deal with these in particular.”

Depute ERO, Scotland and Northern Ireland

Registration campaigns and duplicate registrations

5.13 A National Registration Day was held on 5 February 2015. The registration day was publicised by the Electoral Commission, Cabinet Office and local authorities and, as a result, 166,000 applications to register were received on that one day. However, the ability to register online easily meant that a lot of these applications were duplicate registrations, made by electors who were already registered and were therefore not new registrations.

"On National voter registration day we had over 2,000 online applications - although some of those were duplicates! which takes time to weed out and deal with.”

Electoral Services Manager, London

"The number of applications made on National Voter Registration Day was around 10 times the number we ordinarily receive each day. Around two thirds of applications were duplicates. This doesn’t bother me - I’d rather have 500 applications, even if 400 of them are already registered as it means I’ve got 100 electors I didn’t have before. However,
the effectiveness of the campaign was almost certainly less significant than the numbers that were publicised suggested.”

Electoral Services Officer, East Midlands

5.14 The Electoral Commission carried out a registration campaign. Again whilst the volume of registration applications increased, so did the number of duplicate registrations and the workload associated with these.

"The National EC voter registration campaign was effective in getting people to register to vote BUT it did not communicate that if people already had a poll card, they did not need to go online and register. This was frustrating as it led to hundreds of duplicate registrations each day which we manually had to process so as not to disenfranchise postal voters or merge electors with similar names. Similarly if people added a middle name or initial it generates a name change letter which in turn resulted in phone calls or complaints that people had not changed their name.

[Our local authority] statistics: between 1/3/15 and 20/4/2015: 5363 online applications, 191 telephone, 353 ITR forms, 1865 applications were duplicates.

Electors also thought that when they registered online and chose postal vote, that they had a postal vote, not that a form would be sent to them. This led to a lot of enquiries on polling day and allegations that postal votes had not arrived.”

Electoral Services Manager, Eastern

"......Figures from the final day of registration:  3000 applications - 1500 true duplicates, another 700 or so almost duplicates and 850 sent to the IERDS for checking. 30 or so applications received without NI numbers (most of those remain incomplete despite trying to chase up these potential electors in the final few days).....”

Electoral Services Officer, North East and Yorkshire

"Duplications were the biggest problem, some people registered 5 times in 5 days after being bombarded with TV advertising!! We managed to cope with the huge volume of applications and phone calls.”

Electoral Services Support Officer, North West
5.15 Consideration needs to be given to the wording used in a registration campaign prior to an election to try to reduce the number of duplicate registrations.

5.16 At present there is no “look up” facility available online which a potential applicant registering to vote could use to see if they are already registered before completing an application to register. If this was part of the process, it would be likely to have a significant impact in terms of reducing the number of duplicate applications.

"Massive volumes throughout. 8,000 registrations from IERDS on deadline day alone. Incredibly hard for a team of 7 people to deal with, along with all the other election planning requirements. Around 50% of all applications were duplicates. If there was a way people could check if they were registered online then a lot of time and money can be saved - for both voters and administrators.”

Electoral and Civic Services Manager, London

"Duplicate applications could be reduced by providing some form of register checking online rather than if unsure just register again.”

Scotland and Northern Ireland Branch

"...Improve on line applications process ...could we introduce legislation to allow electors to check if they are already registered?“

Depute ERO, Scotland and Northern Ireland

**Recommendation:**

The UK Government should review the online service with a view to restricting the same person from registering more than once. In addition, consideration should be given to the possibility of a look-up facility to allow electors to check if they are registered before trying to register online.

**End of IER transition**

5.17 The transition to IER started in 2014 with the deferred canvass and publication of the revised register in February 2014 instead of December 2013.

5.18 There is the question as to whether the introduction of IER was at the right time because of the work involved, software development required, the limited amount of time and additional professional
electoral resources being available, as well as being immediately prior to a UKPGE.

5.19 The deferred canvass impacted on the planning and preparations of the European Parliamentary Elections in June 2014. Once the European Parliamentary election results were announced, it was straight into the introduction of IER on 10 June for local authorities in England and Wales. For Scotland, it was 19 September, being immediately after the Scottish Referendum.

5.20 In the majority of cases the staff resources who deliver elections are the same staff who delivered the deferred canvass, registration, and the introduction of IER. Electoral Services teams went into running a major national election with a new registration system and with no respite from the previous election and the introduction of IER. They were completely exhausted at a time when they needed to be refreshed and ready to take on the challenges which a UKPGE brings, without the addition of registration under a new system.

"Staff were worn out before the election due to double election in 2014 then straight into IER with no breaks prior to a major parliamentary election. The electoral services team realised how much extra work and cost this involved but the CO [Cabinet Office] didn’t seem to recognise this."

Electoral Registration Officer, London

"Immense impact on core team who were running at "full stretch" given deferred canvass, Euro elections, implementation of IER, write out, postal vote refresh, household notification letters all straight into the combined May 2015 elections. Very little chance to find time for detailed planning and preparation or to factor in annual leave, etc. This is leading to experienced staff leaving the electoral service and thus to staff shortages with little chance of experienced replacement."

Elections Specialist Practitioner, South West

"I entirely agree with the introduction of IER. However, part of me questions the timing of its implementation. Introducing the new system the year before a General Election seems flawed to me. Specifically the lack of a proper canvass last year led to numbers on the register being down compared to the previous year. Additionally, the lack of canvass meant it was far harder to pick up on properties where residents had
moved on. The HNLs we sent in February helped with this but given the logistics involved, it would have been useful to have had a proper canvass last year.”

**Electoral Services Officer, East Midlands**

"Volume of e forms, paper forms and general enquiries at times were ridiculous and often the team thought they would never get through the workload. This was by far the most difficult registration period I have ever faced in all my years of election work. The stress the staff were under was incredible and we often felt totally let down by the introduction of IER at such a crucial Parliamentary election. The system should have been piloted first and rolled out in a year when critical elections were not taking place. Ministers need to understand the effects electoral reform have on the staff who provide the registration and elections services. Guidance should be sought at grass roots on how to improve the system.”

**Elections Officer, North East and Yorkshire**

"Well it’s the most inaccurate register I’ve ever had to deal with in my 30 years service. Thank God we undertook a 'Mini Canvass'. Would have done one even if instructed not to. It’s been an epic journey and one I wouldn't like to do again. Please stop with Electoral Reform.”

**Electoral Services Manager, North West**

5.21 Under current legislation, the transition is due to end with the publication of the revised register on 1 December 2016. The end of transition would mean that any entries for electors who have not either been confirmed or successfully made individual applications to register to vote will be removed from the register. However, the legislation allows UK Ministers to make an Order between June and August 2015 which would end the transition 12 months earlier with the publication of the revised register on 1 December 2015. A statutory instrument containing such an Order would not need to be debated by the UK Parliament, but could be annulled by a resolution of either House of Parliament.

5.22 In June 2015, the Electoral Commission published a report on the results of additional activities undertaken by EROs prior to the UKPGE and will assess the accuracy of the register as at May 2015. The report provides advice to the relevant Minister on whether the end date for the IER transition can be brought forward from
December 2016 to December 2015 and concludes that it should remain at December 2016\textsuperscript{36}.

5.23 A further consideration that needs to be taken into account is the proposed review of the UK parliamentary constituency boundaries between February 2016 and February 2018. One of the major considerations in relation to parliamentary constituency boundaries is the electorate. The end of transition date when carry forward electors will be deleted if they have not registered under IER, is likely to have a considerable impact on electorate figures across the country.

5.24 The AEA responded to the “Political and Constitutional Reform Committee’s invitation for views on Voter Engagement” in January 2015 welcoming paragraph 16 – “as well as the direct impact on the quality of the electoral registers, the Government and Parliament will need to consider – as we are currently doing in our inquiry into the rules for redrawing parliamentary constituency boundaries – how any bringing forward of the end of transitional arrangements will affect the next review of parliamentary constituency boundaries.”\textsuperscript{37}

5.25 There have been mixed reports received from electoral administrators on when the IER transition should end with some favouring December 2015 on the basis that electors have had plenty of opportunity to register over the previous 12 months and carrying forward electors for another year will not gain anything. On the other hand, some favour December 2016 as they take the view that IER needs to settle down before IER transition can end.

"I am pretty confident that the accuracy of people that have registered is good. The problem I think is the carry forwards and confirmation live run matches are still on. I would like to see the end date for transition this year December 2015. To carry on any longer will mean we have an increased number of people who are no longer resident still registered."

\textit{Electoral Services Manager, South East}

"The transition should end in December 2015. We have significantly reduced the number of outstanding red matches."

\textsuperscript{36} Assessment of progress with the transition to Individual Electoral Registration
\textsuperscript{37} AEA Response to the Political and Constitutional Reform Committee’s invitation for views on Voter Engagement Paragraph 17
Consideration also needs to be given as to how long we undertake an annual HEF canvass.”

Electoral Services Manager, North West

“December 2015 - I cannot see a justification for maintaining two different registration systems for an additional year. Electors have had ample opportunity to make the change to become IER registered. In our experience most of those removed in Feb 2014 were no longer living at the address, so removal was correct. Carrying people forward for longer gives the signal that registration is not important, and runs the risk of retaining people who are no longer eligible.”

Deputy Returning Officer, South East

"I will be happier with the accuracy of the register once we have completed a full household IER canvass in 2015. However, as we still have the carried forward red unconfirmed electors on the register and we don't know how long it will take to fully follow up all the ITRs we send out as a result of the household IER canvass, I think there is a good case for postponing the complete transition to IER until December 2016. In my opinion another full canvass will be required in 2016 to complete the transition.”

Electoral Services Manager, South West

“December 2016 as it all needs time to settle in. The work undertaken so far has only created the foundation. The first HEF canvass will provide a further challenge and its outcome will underpin and strengthen the foundation to move forward hopefully to end the transition in December 2016.”

Principal Registration & Member Services Officer, North East and Yorkshire

"Considering the general election and the turnout, the number of telephone queries on the day from electors and staff at polling stations informs us that the register is as accurate as it can be, given the rolling status. I and my staff, believe that the transition process for IER is necessary and should continue until December 2016 to ensure that the systems and processes are embedded and encompass the first 'canvass' post general election.”

Electoral Services Manager, Eastern
“December 2016. To allow all things to settle, funding to cover the constant need to change / learn / amend processes to continue. The challenge is not over yet. We are all still learning with IER.”

Elections Manager, North East and Yorkshire

“I feel that my register is as accurate as it can be excluding the duplicates that seem to be an endless problem under IER. I feel the end of transition should be at the end of this year but I think we still need the Cabinet Office support and funding to still follow round until the end of 2016 as I don’t see how we are going to manage running IER without the additional funding.”

Senior Elections Officer, South East

5.26 The question arising from some of the above quotes referring to an end date of December 2016 is “what is the meaning of the end of transition”? If the implications are just the removal of carry forward electors, then, on that basis, the end date should be December 2015 for the reasons outlined in the above quotes. However, if the end of transition encompasses improvements in processes, software functionality, along with reviewing the experiences following the UKPGE and identifying and implementing legislative and practical improvements, then the end of IER transition needs to be December 2016 to allow time for the review and improvements to take place.

Recommendations:

- The UK Government should carry out a review of IER processes and IER during the UKPGE, with a view to implementing legislative changes to improve such processes, including as to whether there is still a need to continue with an annual canvass if all local authorities were provided with software functionality to easily data mine local authority and government databases.
- The UK Government should continue to provide sufficient funding directly to EROs to administer IER, to ensure an accurate and complete register is maintained.
- The UK Government should end the transition to IER in December 2015.
6 Individual Electoral Registration

6.1 The previous chapter gave an overview of IER and considered the IER transition along with the end of transition date. This chapter focuses on IER during the election period and the issues that arose.

DWP Verification

6.2 As part of the IER registration process, all applications must be verified, against DWP data. If an application fails verification, the applicant can produce documentary evidence to support their application in the first instance before moving to attestation, if necessary.

6.3 The requirement for the verification of all applications in order to register placed this process as one of the highest risks on the Cabinet Office risk register during the run up to the UKPGE. This was because of the implications if the system failed during the tight election timetable and the likely volume of applications during this period.

6.4 On Monday, 16 and Tuesday, 17 March 2015, local authority verification downloads from DWP were delayed. On 16 March a new version of the matching algorithm was introduced at DWP. This was implemented following analysis of mismatches during the first six months of live running, and following testing, the new algorithm was expected to increase the match rate from the then 93-95% for new applications by around 1.5%-2%. Obviously, the higher the match rate, the fewer people who would have to be asked to provide documentary evidence.

6.5 As a precaution, the older version of the algorithm was kept so it could be reverted back to in the event of an issue. This safeguard was used on Monday 16 March, when an error in the code of the new matching algorithm was identified. This meant that local authorities were unable to download files until 2.50pm that day. DWP had identified the coding issue and fixed it. The new matching algorithm was introduced again on Thursday, 19 March and files were ready to download as planned at 8 am.

6.6 In addition on Tuesday, 17 March a scheduled change at FCO Services unexpectedly interrupted the processing of the files from DWP, which meant files were not available until 9.30 am that day. As a result of this, additional checks and controls on scheduled
changes were implemented along with the careful monitoring of the transfer of files.

6.7 The following report was received on 16 March:

"Hello, just received notification of a delay to verification files, yet again. This is distressing. I need to produce poll card files on Wednesday pm for my printer. I have a full team in today (15 members of staff, many part time), all committed to work long days today and tomorrow to try and ensure that the poll card data file is as accurate and up to date as possible. This is partly for our benefit (reduces phone calls / queries) but is mostly for the benefit of the elector. Our task is not helped when we are dealing with such verification delays at a critical time. We are completely overwhelmed by the volume of IER work and it seems that efforts that we make to try and get on top of things are thwarted by the actions of others. (see also 10 March when the system was down for 3 hours on a deadline). The EC campaign has just begun and, having got on top of new applications we can already see a significant number of new applications - we’ve processed a few so far and they are nearly all duplicates. Today, I feel like we'll never get to election day unscathed - and this latest verification delay is almost too much to bear."

Electoral Services Officer, North East

6.8 In addition there were a number of other reports from electoral administrators regarding delayed verification files:

"The number of delays with verification files being unavailable was significant. Whilst none of them lasted a long time, the performance issues are worrying. We have evidence of the applications for some electors that completed on-line applications (and received a receipt) not being received within our EMS system. We have taken that up with our supplier."

Electoral Services Manager, North West

"In all honestly this worked very well. There were some delays at times but these were not time critical. The process was very good."

Electoral Services Manager, London

"Applications were checked and returned quickly - this was good. Excellent turn around on the morning after the deadline.....Some frustration that the verification files were delayed on many occasions. The work involved in dealing
with IER is now significantly more complex. Needs to be dealt with differently in offices. Can’t be done by temp / inexperienced staff anymore”.

Electoral Services Officer, North East and Yorkshire

6.9 Normally, verification files were available for download each morning. However, as polling day approached, arrangements were made to schedule additional verification file processing times with DWP so that applications could be verified more quickly. These additional downloads were available from 11 April – 26 April, including weekend slots and twice daily slots during the week commencing 20 April 2015 as detailed in the timetable below:

<table>
<thead>
<tr>
<th>Date</th>
<th>Files available</th>
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<tbody>
<tr>
<td>Saturday 11 April to Sunday 19 April</td>
<td>8.15am</td>
</tr>
<tr>
<td>Monday 20 April - Friday 24 April</td>
<td>8.15am</td>
</tr>
<tr>
<td></td>
<td>3.30pm</td>
</tr>
<tr>
<td>Saturday 25 April and Sunday 26 April</td>
<td>8.15am</td>
</tr>
</tbody>
</table>

6.10 These additional downloads were welcomed by electoral administrators, but some thought that the additional downloads should have started a week earlier to assist with the volume of applications and the processing time.

"...I am impressed with the system overall. The extra downloads in the afternoon were useful in the election period but I think they came a week too late in the process. I would have liked them the week before the registration deadline as well so that the team could have processed these each afternoon reducing the numbers each morning."

Electoral Services Manager, Eastern

"Because the deadline was a Monday I am really glad we came in on the Saturday to clear all the on-line applications. Really helpful having the extra downloads over that period."

Senior Electoral Services Officer, South East

"I contacted the Cabinet Office following IER insight telling us that there’d be weekend data from the digital services on 11 & 12 April and 18 & 19 April and that we’d get data twice a
day from 20-25 April. I said that this was really helpful but suggested that twice daily data for the two to three weeks prior to 20 April would also be helpful…”

Electoral Services Manager, London

"IERDS will be available twice a day during the w/c 20 April. It would be good if this was extended to the week before the closing date to allow for continual updating of the information, in particular, it would be useful for making sure postal vote information is issued asap to electors being added to the register.

Electoral Services Manager, South West

6.11 A further issue reported was some newly built properties not being on the Government Digital Service when someone tried to register online close to the deadline.

"New property postcodes not on the GDS. People trying to register online right at the deadline were not able to.”

Electoral Services Manager, Southern

Registration deadline

6.12 The deadline for receiving applications to register to vote is minus 12 working days from polling day. The deadline for the UKPGE was Monday 20 April. There is no time set in legislation for this and so the deadline is midnight whereas for some other deadlines the time is set. For example the deadline to apply for a postal vote is set in legislation as 5pm on the appropriate day.

"Registration deadline to be 5pm and not midnight.”

Consultant, North East and Yorkshire

6.13 With any UKPGE, the volume of applications to register during the run up to the election is huge. However, the introduction of IER and the ease of registering online also saw the added burden of applications from electors who were already registered having to be processed.

6.14 Below is a graph provided by a London borough which clearly demonstrates the large spike of applications to register received on the National Voter Registration Day, registration deadline day (20 April) and even a small spike on the day before election day. It also demonstrates the number of duplicate registrations, green electors
(verified by DWP), and red electors (failed DWP verification and need to provide further evidence in order to register).

"......A picture says more than a thousand words."

_Head of Electoral Services, London_

6.15 The high volume of registrations and the duplicate applications took staff resources away from working on the other aspects of the election. Numerous other reports were received from electoral administrators detailing the challenges they faced on day -12 some of which are below:
"High volume. Numerous electors registering on-line but they were already on the register. Difficult to process all late applications by the deadline and push through to the relevant stages on the software. [Our EMS] for letters etc. have to be printed to transition to the next stage so high volume printing caused some minor delays."

Electoral Registration Manager, Wales

"As I have stated earlier, IER was the greatest risk to the May election. The volumes were almost impossible to keep up with - we had 19,000 online applications 18th -20th April 2015. Many were duplicates but all had to be worked - the freeformat style of the online application also creates work when matching. We had a surge of enquiries from electors and elected members asking why we needed documentary evidence when they had lived there for years and had voted every year. The lack of awareness and understanding of IER hit us when we were most busy - despite the campaigns, information etc. People just did not "get" IER until they had to."

Electoral Services Manager, West Midlands

"Over 8,000 electors processed in 10 working days."

Electoral Services Manager, London

"Registration deadline is now very blurred in respect of timing of receipt of non-confirmed applications and the follow up evidence requests. Duplicates was a major problem in respect of volumes and taking resources traditionally used at this point in the timetable for election issues out of the equation to deal with registration issues. The ideology of simply throwing resources at it is very naive as it requires a skill set to properly undertake."

Electoral Services Manager, London

"Volumes were high, processing was slow and the time it takes to process duplications on our EMS was a burden."

Electoral Administrator, Scotland and Northern Ireland

"Huge numbers. We had 48,000 applications since publication. Over 21,000 added since publication of which over 10,000 were in final month (from 11 March to 20 April) and 3,017 on deadline day itself. But [our] system made all of it manageable. We kept sending evidence requests, reminders
and then attestation requests and again as system automates much of it not too painful overall. I think given this is year one that bound to be some issues but overall a very positive experience and definitely no need for an annual canvass anymore which should save thousands and thousands of pounds and the perception of us being overly bureaucratic.”

Head of Registration & Electoral Services, London

"Worked until midnight on the deadline day to assist electors - took the final call at 11.40pm. For several days no election work took place whilst we dealt with registration (and then the postal vote deadline the following day). Most of the election work was done out of hours / during the weekends. Duplicates - huge problem. Implications - resource team differently. The team needs to increase in size at election time - but you need experienced staff. Not sure how this can be resolved or are we stuck in some ridiculous cycle of peak and more peak? Very difficult to deal with during this time of change in local authorities.”

Electoral Services Officer, North East and Yorkshire

"Very high volumes were received in the last few days, many of which were electors who had moved house in the previous few months, which meant over 4,000 applications resulted in just a few hundred extra electors in total. Approximately 55% of applications in the last few days were duplicates, up on the normal daily average of about 48%, however the duplicating function of the ESM appeared to work well, however it became apparent on polling day that it possibly not been as good as we thought with a number of mis-matched duplicates. We had to amend about 20 electors, which may not have sounded many, but they were quite time consuming to resolve and involved communicating with the Presiding Officer in the polling station and the electors concerned.”

Electoral Registration Manager, Deputy RO, Wales

**Documentary evidence**

6.16 Under IER, any new applicants who are not verified by either DWP or local data matching are required to supply documentary evidence, as prescribed. The deadline for applying to register was 20 April but any electors who had applied prior to this date and had not been verified (i.e. had been returned as a red match) had until
28 April to submit their documentary evidence to be able to be registered and thereby vote at the elections on 7 May.

6.17 A carried forward unconfirmed elector had to vote in person at the polling station. However, if they had a postal vote prior to IER or had applied for one before the deadline, they could supply the prescribed documentary evidence up to 10 pm on polling day and then become eligible for a postal vote.

6.18 The complexity of the process for the above circumstances and administering and checking of the documentary evidence caused a dramatic strain on staff resources at a time when staff would normally be making preparations for the elections. In addition, the complex process caused confusion to the electors.

"Impacted on workload following -12 and resources didn't allow as much time to focus on preparation of other activities e.g. the count"

Elections and Democratic Services Manager, Eastern

"We had to change staff plans so that more were available to try and resolve queries from electors (pending and registered and postal voters). Instead of late registration being a cut off and move on to postal votes, we never stopped registration queries until we had to physically leave the office at 9pm on election day to get to the Count venue. We were fielding calls from presiding officers and adding electors (where error correction but this often was difficult if for example they had applied online but then been deleted before verified, we could not track them down so had to get web ack proof + ID) and we were still determining & verifying where evidence was produced..”

Electoral Services Officer, Eastern

"The requirement to contact electors and ask for evidence meant we couldn't run the election so we just worked even longer hours."

Elections Manager, North West

"Numerous electors at evidence stage - difficult to reach within short deadlines especially if no telephone number or e-mail address provided. Some postal applications not processed as not IER registered in time."

Electoral Registration Manager, Wales
"Took up too much time and staff dealing with requests for evidence and processing evidence coming back in. This was difficult as co-incided with start of postal vote openings, and preparation for the count."

Electoral Services Manager, London

"This part of the process needs reviewing as the impact it has on different things so near to the election is unreasonable."

Principal Democratic Officer, East Midlands

"Small number of electors that required to provide evidence also applied for a postal vote. 117 late verified postal voters. Late issue absent votes also impacts on the polling register and absent voter lists."

Principal Admin Officer, Scotland and Northern Ireland

"The amount of voters unable to vote because of this was not high. Equally the impact on postal votes was not as bad as may have been anticipated. We only had a couple of instances of evidence being provided late, in these cases the system was so complex that my staff were nearly as confused as the electors as to whether the individuals would be allowed to vote or not."

Senior Electoral Services Officer, South East

"The biggest problem with the registration deadlines is electors being able to provide evidence up to -6 this causes a huge problem with capacity in the team trying to chase up and process evidence. The cut off -12 should be the cut off for evidence as well and electors should be encouraged to supply this at the time of their application if close to the deadline. If this remains more capacity will be required in election teams as it causes a backlog of the other tasks that would normally take place from -12 to -6. Also it is very difficult to be able to manage electors expectations about receipt of postal votes because they may not be able to be approved and therefore receive a postal vote until as late as -5 which in some cases is too late as they may be going away."

Elections and Land Charges Team Leader, Eastern

"I think that the registration messages could have been clearer on the www.gov.uk/registertovote site from the outset. The messaging should have stated to the elector that completion of the online form was not necessarily the end of
the process. I think that a short explanation of the data matching process on the DWP site would also help as electors are often hearing about this for the first time when they come to us. If they’ve applied online, they should be told what their details (NI number and DOB) are being used for. This would help reduce elector confusion, lead to a more transparent process, and provide information as to what the electors details are being used for. There were many issues with verification files being late in the lead up to the elections but these seemed to have been dealt with by the end of March.”

Electoral Services Officer, East Midlands

"If no NINO supplied - we WILL contact you, not 'may'.”

Southern Branch

"People thought they were registered because they had received the on-line reference number and so did not realise they may need to take further action. It should be made clearer when people register that they are not on the register yet.”

Elections Officer, Southern

"Explanation of 'data matching process' needed as part of the registration process. Many electors were confused about the fact that they had made an application but were not registered. Clearer messaging on the .gov website and additional information needed on www.aboutmyvote.co.uk.”

Head of Electoral Services and Elections, London

"IER - Contact details need to be Mandatory.”

Electoral Services Manager, South East

6.19 Following the end of the IER transition period, there will no longer be the process of non IER electors submitting documentary evidence up to 10pm on polling day in order to receive their postal vote as those electors will have been removed from the register. This could be an issue again at future elections if the end of transition is December 2016.

6.20 As clearly demonstrated from the above quotes, there needs to be a review in relation to the registration deadline as a result of the introduction of IER and the consequential additional processes and
the deadline for submitting documentary evidence. Both have a significant impact and knock on effect in relation to staff resource and logistical issues of producing polling station registers and absent voter lists.

**Recommendations:**

- The Cabinet Office should consider providing additional verification downloads earlier in the election timetable for future elections.
- The deadline for applications to register to vote at an election should be changed from midnight to 5 pm to allow for consistency with the postal vote deadline.
- The UK Government should consider a review of the registration deadline before elections to allow more time to carry out the additional processes such as the checking of documentary evidence.

**IER and special category electors**

6.21 The special category electors which provided the biggest administrative challenge for the UKPGE was the registration of overseas electors, with very few issues raised in relation to other special category electors.

6.22 Overseas electors are entitled to register for 15 years after leaving the UK and many overseas electors register immediately prior to a UKPGE. There had been an Electoral Commission campaign to register overseas electors. The introduction of IER had implications to overseas electors registering, but also there was a significant staff resource required in processing and checking they had been registered within the local authority area in the last 15 years. There were also issues with overseas electors not requesting a postal or proxy vote application form, along with some confusion in assuming they had applied for a postal vote whilst applying online. In addition, some electors registered too late for their postal vote to be received and returned in time to be included in the count.

"In 2010 we had 703 overseas electors and the total reached this time was 1,918. The total numbers received since publication of the register on 1 December 2014 and on subsequent months are as follows:

1 December 2014 – 335
2 January 2015 – 369
2 February 2015 – 438
As you can see the 1,299 were received in the last 6 weeks for the 20 April deadline and two members of staff worked constantly on these in the two weeks leading up to 20 April 2105.

Head of Electoral Services and Elections, London

"The volume of overseas electors continues to be an issue at Parliamentary elections. IER has further increased this with these electors being able to register online. This is a fairly good process but checking each registration over the 15 year period was a challenge. I think more guidance for overseas electors should be provided on registration in terms of absent voting. We had a lot of queries concerning this, for example, electors not applying for an absent vote until late on and then wondering why we hadn't sent their postal vote out until day - 6."

Electoral Services Manager, Eastern

"Overseas - online information to suggest checking ERO last registered address in 15 years BEFORE completing application."

Southern Branch

"Masses of overseas which are time-consuming to deal with. Went up from 240 to 1111 for election. Many of whom don't apply for an absent vote which meant us chasing them down to tell them they have no postal or proxy in place. Unrealistic expectations about overseas postal votes getting to people on time when they have registered late in the process."

Head of Registration & Electoral Services, London

"We had a huge number of overseas elector applications over the final few weeks, we had 24 overseas electors prior to IER and now have 162, we also had to reject around 20 applications some because they had been out of the country for over 15 years, some because there was no record of their previous registration. The research involved trying to establish previous registration (they rarely provide an accurate date of registration) is time consuming, of the
additional electors only around 55 had time to organise an absent vote partly because there seemed to be a lack of understanding on their part and a few because their applications arrived too late.

I'm not sure whether the Cabinet Office website does provide an explanation on the restrictions on overseas applications or whether they just hadn't read them. The volume appears to have been a result of an article in some ex-pat newspaper rather than just the EC campaign so I assume it may not have been explicit enough. They also appeared to be oblivious of the limitation on the postal services and hadn't considered the length of time it would take for postal packs to arrive. It would be useful if the Cabinet Office site could provide some advice on the advantage of proxy voting for Overseas electors. There were no issues with any other special category electors.”

Electoral Administrator, Scotland and Northern Ireland

"There was a high number of overseas electors registering to vote. Many overseas electors were not able to be verified and could not find an elector to attest their application. Specifically this took up a lot of time emailing information and trying to explain why the system had changed. It would also be pro-active to automatically email an absent vote application to the overseas electors.”

Electoral Services Manager, Eastern

"Large number of overseas applications, some very late, just before day -11. It became apparent that many didn't realise that they had to submit a further application for an absent vote and failed to see the form e-mailed by the IERDS, possibly because they had input their e-mail address incorrectly, it was considered to be junk or they simply didn't check their e-mails in time. Overseas applications involve a disproportionate amount of work due to the time it takes to track down the last elector number. Our total number of overseas electors went from the mid 20's to 150+ by day -11.”

Electoral Registration Manager & Deputy RO, Wales

"...Although the volume was high online registration meant these individuals were very easy to contact regarding any problems and absent vote arrangements. A handful of overseas electors requested that could only be contacted by
post - I think this should be removed as an option as contact by email was highly effective.”

Principal Electoral Services Officer, Eastern

“Overseas electors - one member of staff full time for four weeks to manage these. That's a big impact on a team of 6.”

Electoral Services Manager, Southern

"A massive number of overseas electors - around 1200. The processing takes far too long and is far too complicated. The website doesn't explain the process to voters properly or provide realistic expectations for what will happen next - especially in the event they tick the postal vote box on deadline day, despite living in North Korea. Receiving that application from IERDS 4 days after the deadline left us no time to send out the application, let alone start a dialogue about proxy voting.”

Electoral and Civic Services Manager, London

"The rules about unmatching electors requiring attestation by another British Citizen registered under IER and living overseas is ridiculous. The fact that these people leave it so late to apply is also an issue they should have to maintain the registration year on year following leaving the country until their 15 years expires. They should also have to apply for a postal vote by an earlier cut off to make it more realistic that they will receive this in time to complete and return it or only be able to vote by proxy or postal proxy.”

Elections and Land Charges Team Leader

"The online Overseas process needs reviewing. It is ridiculous that Overseas that do not verify have to go straight to attestation, when they provide their passport number on the application. Surely this can be included in the verification process? Also according to the transaction image we are only advised when they have requested a postal vote and not a proxy (as far as I can tell). We have a large number of Overseas who have been emailed a PV application but have not applied.”

Electoral Services Manager, South West

6.23 As the quotes above demonstrate, a large volume of UK citizens overseas applied to register to vote at the UKPGE but unfortunately, because of the issues outlined, many were unable to.
6.24 In addition, complaints were received from electors who had used the Welsh online registration system and at the same time requested a postal vote application form, as the form received was an English version and not a Welsh version.

"...we’ve received a few complaints over the election from electors that had used the Welsh on-line registration system. They had requested a postal vote application form and received an English version and then complained to us as they assumed we were responsible for the output."

_Registration Officer, Wales_

**Recommendations:**

- The UK Government should consider a review of absent vote arrangements for overseas electors, to ensure a suitable practical solution, so that “last minute” applicants are still able to cast their vote.
- The Cabinet Office should review the wording on the registration website to ensure it clearly explains the issues relating to registration, and absent voting administration and options.
- The Cabinet Office should ensure that a Welsh language postal vote application form is sent out for electors registering via the Welsh online registration service.
7 Absent voting

7.1 The election timetable at Appendix 2 of this report details the various deadlines in relation to postal and proxy voting for the elections held in May.

Postal voting applications for 7 May 2015

7.2 The deadline for postal vote applications was 5 pm on 21 April. There was no prescribed postal vote application form and applications could be submitted in any form, so long as they contained the necessary information set out in regulations. The personal identifiers (signature and date of birth) are set out in the format prescribed in legislation\(^{38}\). There were significant volumes of postal vote applications received by ERO’s during the election period.

"Huge amount of emergency proxy applications to deal with. We received around an additional 9,000 postal applications during the election period."

Electoral Services Manager, South West

7.3 Postal voting has become an integral part of the campaign strategy of political parties and campaign groups. As a result, it has become standard practice, certainly by the main political parties, to produce postal vote application forms for distribution with or attached to their campaign literature.

7.4 Generally, the political parties use the postal vote lists and electoral registers supplied to them in accordance with regulations\(^ {39}\) in order to target their mailings. There have been issues in the past where some forms were difficult for the ERO to process electronically, owing to the paper quality or layout of the form, and also issues relating to the return address for the form.

7.5 Whilst a report was received in relation to the quality of paper having improved at the elections on 7 May, there were some issues reported in relation to the political parties and their handling of postal vote application forms:

\(^{38}\) Regulation 51, Representation of the People Regulations 2001 (as amended)

\(^{39}\) Representation of the People Regulations 2001
“Parties used better postal vote forms this year, no problem with scanning them in.”

Senior Electoral Services Officer, South East

“Parties sending out postal vote forms and bulk delivery to us, caused issues with processing.”

Electoral Services Manager, West Midlands

“Political parties had written to electors encouraging postal vote applications on their version of the application form. This created additional work in the office and also resulted in applications from electors who already had a postal vote and those who were not IER registered.”

Consultant, London

7.6 In March 2015, the AEA responded to the Law Commission – Electoral Law: A Joint Consultation Paper fully supporting the following provisional proposal:

- Absent voting applications should substantially adhere to prescribed forms set out in secondary legislation.

7.7 As is the case for all fixed elections, the Electoral Commission had issued a Code of Conduct for political parties, candidates, canvassers and campaigners on the handling of postal vote applications and postal ballot papers in Great Britain for these elections. This was agreed by national political parties. ROs also circulate this Code of Conduct to local political parties as a reminder about this part of the election process. Unfortunately, the Code of Conduct is only a voluntary code and, as the following quotes highlight, there were still some issues in relation to the handling of postal votes at these elections. As highlighted in chapter one, a RO reported:

  “only 30% returned a form issued by the Chief Constable and myself confirming that they would abide by the Code of Conduct”.

  Electoral Registration & Returning Officer, Southern

7.8 In relation to the above Code, the Electoral Commission had suggested that the following recommendation should appear in its Code of Conduct:

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41 Code of conduct for campaigners
“Campaigners at elections and referendums in the UK should not be involved in the process of assisting other people in completing postal or proxy voting applications or handling of postal ballot packs.”

7.9 Unfortunately, this recommendation was not approved by the political parties for the Code of Conduct agreed for the elections in May 2015 and, therefore, was not included. It is worth bearing in mind that the Code of Conduct is only a voluntary one. We believe that, as a result, there is a need for provision to be made within legislation to make these actions an offence.

7.10 In the AEA’s response to the Law Commissions’ Consultation Paper, we supported the proposal making such activity an offence.

Recommendations:

- The UK Government should set out in secondary legislation that absent voting applications should substantially adhere to prescribed forms.
- The UK Government should change electoral law so as to prohibit the involvement by campaigners in any of the following:
  - assisting in the completion of postal or proxy voting applications;
  - handling completed postal or proxy voting applications;
  - handling another person’s ballot paper;
  - observing a voter marking a postal ballot paper;
  - asking or encouraging a voter to give them any completed ballot paper, postal voting statement or ballot paper envelope;
  - if asked by a voter to take a completed postal voting pack on their behalf, failing to post it or take it directly to the office of the Returning Officer or to a polling station immediately;
  - handling completed postal voting packs at all.

Postal vote identifier reminder notice 2 (PVIRN2)

7.11 The European Parliamentary Elections (Amendment) Regulations 2015 were made on 2 March 2015 and came into force the following day. It required EROs to issue a further notice in the period 19 to 28 March 2015 to postal voters whose postal ballot paper was

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42 EC Report - Electoral fraud in the UK - recommendation 3
rejected at the European Parliamentary election in May 2014, who were notified of this following the poll and who still had a postal vote.

7.12 There were several issues in relation to the PVIRN2 notice including the lateness of the order (thereby not following the Gould principle), software functionality to retrieve the information from an election held almost a year previously, a revised register published in the interim and many administrators having already created the 2015 election within their election management system. In addition, the PVIRN2 notice also created confusion to and adverse comment from some electors. In essence, it appeared to some to be bureaucracy gone mad considering the amount of correspondence they would had already received in relation to their postal vote, i.e., the notification advising them they had got it wrong after the elections held in May 2014; the PVIRN2 notice reminding them of that fact; a postal poll card for the May elections; and then their postal vote pack which contained their ballot papers. Some of the reports received are detailed below:

"The PVIRN2 caused some calls from cross people who do not like to be reminded that their previous vote didn't count because of something silly they did. The phrase 'rubbing salt in old wound' was used."

Election Manager, North East

"Postel vote reminder notice - pointless and confusing for voters. We took a lot of calls when these went out from confused electors. They didn't understand what it meant and didn't make the connection with last year's elections (too far away in time). Many electors thought that there was a problem with their postal vote for this year."

Electoral Services Manager, North East and Yorkshire

"The Postal Voter Information Reminder Notice 2 (PVIRN2) was sent out as required on 19th March. This resulted in telephone calls from people to cancel their postal vote."

Electoral Services Manager, Eastern

"....The PVIRN2 was nothing short of a disaster. Electors were confused or annoyed and most did not need reminding that their previous postal votes had been rejected. At the best this exercise was seen by most electors as a waste of money. At worst it was seen as harassment or embarrassing for the elector. Some of these electors, in the light of IER, may have
received up to ten letters from us (HEF/ITR/Evidence requests and reminders, confirmation acknowledgement, HNL, PVIRN2) which seems a little excessive in a space of under 12 months.”

Electoral Services Officer, East Midlands

7.13 It is understood that the PVIRN2 notice will not be repeated for future elections. The AEA welcomes this, as it strongly opposes the principle behind the issue of PVIRN2 notices for the reasons outlined above.

Issuing postal votes early

7.14 Provision is now available in legislation to issue postal votes early. This has been introduced to enable postal voters to have more time to receive and return their postal ballot paper before an election, especially if it is being posted overseas.

7.15 As a result, postal votes were to be issued as soon as was practicable after 4 pm on 9 April for these elections. In practice, this meant at any time after the details to be printed on the ballot papers had been confirmed, i.e. after the deadline for withdrawal of nominations which, for both UK Parliamentary General and local elections, was on the 19th working day before poll (9 April 2015).

7.16 The ERO was required to publish two interim election notices of alteration, before publishing the final election notice of alteration on the fifth working day before the poll. This supported the dispatch of postal votes at an early stage in the timetable to those electors who had applied to register closer to the registration deadline. A postal vote can only be issued to an elector who has already been added to the register. This early dispatch would maximise the time available for electors, especially for those overseas.

7.17 The deadline for changes to existing postal or proxy votes was 5 pm on 21 April. Previously, EROs would have issued their postal votes as soon as practical following this deadline, being either the following day or the day after that in most cases.

7.18 Whilst the legislation may have made provision for the early dispatch of postal votes (as soon as practicable from 4 pm on 9 April) and, at the same time, raised the expectations of some postal voters whilst confusing others, the practicalities for an ERO are very different. Postal ballot papers can only be dispatched once printed, which cannot start until the names of the candidates are known. In addition, there are a limited number of specialist electoral printers available and combined polls and the number of ballot paper
variations for each local authority area adds severe pressure to the capacity available in the print industry across the country.

7.19 In some cases the supplier was dictating to the customer when they received their ballot papers as demonstrated in the quotes below. There are also the added complications whereby a person who is sent their postal vote early in the election timetable may receive it, but subsequently decide they no longer wish to vote by post and still be within time to make changes to their absent voting arrangements to take effect at the elections. Postal votes being issued in an area with cross boundaries with the UKPGE this year was an issue in some areas, especially if the polls were combined with parishes and the elector received different postal vote packs at different times.

"Early issue of overseas was useful as we got more back. The main issue we had was that we issued early our 'existing postal voters'. They received their packs on 21 April which was before the deadline to amend their postal vote arrangements. They could also appoint a proxy right up until 28 April, therefore we had more cancelled postal votes in the system than we have ever had. People basically got their pack and then rang to say they didn't want it. There were no cross boundary issues as this time each authority issued their own combined packs and therefore dealt with their own returns."

Election Manager, North East and Yorkshire

"No - we were beholden to our Printing Company."

Electoral Registration Officer & Returning Officer, Southern

"Yes issued early, a lot of cancellations which are unhelpful and have to be pulled."

Elections Officer, Scotland and Northern Ireland

"We had not planned to issue postal votes early and it would have been impossible for us to do so considering how late we received our postal ballot papers. We also had the complication of cross boundaries, which meant getting some of our district and parish papers to our give-away authority for the combined issue there."

Electoral Services Officer, South West
“We issued on 20 April, not as early as we would have liked but our printer informed us all the earlier slots had been booked before Christmas.”

Principal Elections Officer, West Midlands

“Early issue of postal votes before deadline creates issues with cancellations, however the benefits for overseas are clear as we had issue with late applications and unlikely to have received and returned in time.”

Principal Admin Officer, Scotland and Northern Ireland

“….Our cross boundary authority sent out postal votes before the 21/4 deadline - we had to manage Comms across the Council area to explain why some electors were getting their postal votes a week before others.”

Electoral Services Manager, North West

“We feel that there is an issue with being able to dispatch postal ballot papers prior to the deadline to change or cancel an existing application. Whilst we agree that it would be helpful for electors if they were sent out earlier (we usually dispatch about two weeks prior to polling day) it may be more appropriate to change to postal vote deadline from 11 days to 13 days to allow more time to print and for delivery.”

Electoral Services Manager, East Midlands

7.20 On 30 March, the Cabinet Office issued a circular to all suppliers and electoral services teams, providing them with guidance on recommended dispatch dates for postal votes for overseas and BFPO addresses. The guidance highlighted that the Cabinet Office had worked with Royal Mail and BFPO to collate this information, following the changes to the election timetable and the ability to send postal votes out earlier. The guidance was based on the estimated time for posting to other countries (both out and back) and the recommended final dates for postal votes to be with BFPO. The recommended date of last receipt by BFPO was 17 April for a few with other countries ranging from 18 – 20 April. Following concerns from electoral administrators at receiving such late guidance when their printing slots had been agreed with printers for months, further guidance followed the next day. The guidance advised that the recommended dispatch dates for overseas electors had a 5-day window included for electors to complete and post their completed postal votes back as well as the outward and return delivery times.
".....Guidance regarding postal voter issue, particularly overseas, inefficient for ensuring everyone is enfranchised.”

Electoral Services Officer, Eastern

7.21 The following quote was received after the initial guidance.

"Having looked over this now I’ve got to comment that the proposed dates for overseas posting of postal votes look to be "challenging". I’ll discuss with our printers, but I think there may be difficulties in extracting the overseas ones and getting them separated for dispatch that quickly. This date has come too late in the process."

Senior Depute Returning Officer, Scotland and Northern Ireland

7.22 An inner London Borough provided us with details and statistics relating to their dispatch and returns of postal votes sent overseas for 2015 compared with 2010 as shown in the tables below:

<table>
<thead>
<tr>
<th>Year</th>
<th>Overall sent</th>
<th>Overall returned</th>
<th>Overall % returned</th>
<th>Sent within Europe</th>
<th>Sent worldwide</th>
<th>% Sent worldwide returned</th>
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<tr>
<td>2010</td>
<td>205</td>
<td>123</td>
<td>60%</td>
<td>117</td>
<td>96</td>
<td>82%</td>
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<td>82%</td>
<td>88</td>
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<td>2015</td>
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<td>170</td>
<td>81%</td>
<td>127</td>
<td>113</td>
<td>89%</td>
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<td>62%</td>
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"...As you will see the returns for those postal votes sent before the deadline date were very healthy. However, those sent after the deadline date not so good, especially worldwide. Our overall return this year was unfortunately lower than in 2010. In 2010 the dispatch of all the postal votes took place from here and were all in the post by the
Friday after the deadline. This time around due to our larger numbers [our external printer] dispatched all our postal votes except for the very last run which was done from here. They were supposed to go out on Monday 27 April but in fact did not go out from [our external printer] until Tuesday 28 April. This meant that in relation to 2010 they went out four days later than in 2015 and the last run went out five days later.”

Electoral Services Assistant, London

Emergency proxies

7.23 The deadline for proxy applications was 5 pm on 28 April. The deadline for emergency proxy applications was 5pm on polling day (Thursday 7 May 2015). Emergency proxies may be appointed for a particular election in the following circumstances:

- in the case of a medical condition, illness or disability arising after the deadline for ordinary proxy applications (i.e. 5 pm on 28 April)
- if the person is a mental health patient detained under civil powers (i.e., who are not detained offenders)
- if a person’s occupation, service or employment means they cannot go to the polling station in person and they became aware of this fact after the deadline for ordinary proxy applications (i.e. 5pm on 28 April).

7.24 Whilst at previous elections there may have been a few applications received as a result of late illness etc., there were very few emergency proxy applications received in relation to a person’s occupation, service or employment. However, political parties and campaigners have become more aware of the facility, as witnessed by the significant volume of emergency proxies issued at the Scottish Referendum in September 2014 for employment reasons. This increasing trend continued for the combined polls on 7 May, with significant implications for staff resources in processing the volume of applications.

"Emergency proxies were significantly increased and were quite time consuming. A lot appeared to be politically motivated."

Consultant, North East and Yorkshire

"Emergency proxies - arrgh! So much work, not convinced most of them found out after 28 April but they were signed, so what can you do. Pressure from Parties to allow

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43 Regulations 51 and 52 of the RPR 2001
emergency proxies for people attending funerals, autopsies, visiting people in hospital and even going to London to see a show Wednesday and not back until Friday as a surprise birthday present!....”

Democratic Services Manager, Southern

“........Major increase in emergency proxy applications up until the deadline, causing a lot of pressure put on staff on what is a very buzzy day. This deadline should be day before....”

Admin & Electoral Services Manager, North West

“Hurricane of applications. Unprecedented.”

Electoral Registration Officer, London

“....Emergency proxies - people still don't understand the criteria. Having a cold/feeling unwell isn't an emergency nor is booking a last minute holiday. Some people seemed to know exactly what to say and unfortunately we didn't believe what they were saying - sounded too convenient. It was as if they had been coached into what exactly to tell us. We only had 3 genuine cases which we allowed. People, who hadn't spoken to us about the matter, were downloading the form from aboutmyvote and the proxy was then taking it straight to the polling station expecting to be issued with a ballot paper. Something needs to be clearer on the website.”

Senior Electoral Services Officer, Eastern

“.....Emergency proxies are a mess - no real control over these as there seem to be a big number of self-employed people who applied - who had their applications endorsed by someone they know - a nonsense but we are powerless to stop this. On a very busy election day, having to contact the polling staff to inform them was time consuming.”

Electoral Services Manager, London

“Emergency proxy applications are increasing and are time consuming. Many enquiries are received from electors who do not qualify and it can be difficult to explain where the criteria is not met.”

Electoral Services Manager, Southern
"Issuing postal votes to electors going 'green' after -12 took up too much time. Contacting proxies who were red or their proxy was red or not registered took up time. Electors get very cross if you refuse an emergency proxy that is quite clearly not valid. The biggest group this affects are electors caring for someone with a medical emergency. They cannot understand why it does not cover them."

Senior Electoral Services Officer, South East

"...There was an increase in emergency proxy applications due to work reasons (off shore workers and away from home). This was all done by email and the EC said to accept a clear photo of the application form. So it started with ordinary proxies, continued though to emergency proxies and right up until the deadline on polling day. I would estimate we handled 70 emergency proxies, whereas this used to be an exceptional process."

Election Manager, North East and Yorkshire

7.25 There is a significant administrative burden in processing and checking that an application for an emergency proxy meets the criteria set out and is valid before granting the application. As can be seen from the above quotes, there were issues in relation to applications made by allegedly self-employed electors applying for an emergency proxy and there is a need to review the criteria as a result.

7.26 In addition the proxy to be appointed on the application form has to be an IER registered elector and Electoral Commission guidance suggests that the ERO should seek confirmation that the proxy is IER registered. In effect, this meant contacting another local authority for confirmation at a time when their staff resources are also stretched along with limited timescales.

"Big increase in proxy and emergency proxy - difficult to analyse reasons and if eligible. I said no to some not well received. Problem also in notifying polling stations of these on polling day. Many of course were not IER registered which again caused issues with voters who did not understand why they could not vote for family members - needs looking at."

Head of Electoral & Member Services, London

"Emergency Proxies - a huge amount of forms for this were submitted this year. This meant that the strain on electoral..."

44 Representation of the People Act 2000 Schedule 4
services did not let up at any point. Where increased amount of people are allowed to apply for an emergency proxy on an employment or study basis this can become open to abuse. Electors were also unsure as to the process in general, and some tried to take an emergency proxy form straight to the polling station. EC form needs to have a space to add a contact number or email for the proxy, bearing in mind that it is helpful to be able to contact them.”

Head of Electoral Services and Elections, London

7.27 Whenever an emergency proxy has been appointed, polling station registers need to be updated, manually if they have already been printed. Once registers have been issued to the Presiding Officer, they need to be informed of such appointments, including by phone, particularly as there is no requirement in law for the proxy to provide any documentation in order to be permitted to vote. Electoral Commission guidance also states that wherever possible, the ERO should provide the proxy of any voter whose application has been accepted with a letter authorising them to act as a proxy. This should include details of the person on whose behalf they are voting. The proxy should take the letter to the polling station when voting. EROs should also, wherever possible, issue a supplementary list of proxies to the appropriate polling station which can be added to the list originally supplied.

"30 emergency proxy applications made in the run up to polling day. The opening up of these to business reasons made the difference, prior to that we had never had an emergency proxy. They are labour intensive to process as the registers need to be manually amended.”

Elections & Information Manager, Southern

"Emergency proxy applications proved the biggest challenge, the volume received the day before the election and on election day basically took up one member of staff's time, full-time. Getting the information out to the polling stations was difficult, not every station had a mobile phone signal and there is a general lack of understanding with regards the logistics in providing this service.”

Electoral Administrator, Scotland and Northern Ireland

7.28 As a result of the practical administrative implications with the volume being received, the circumstances and the deadline for receiving emergency proxy applications needs to be reviewed.
Recommendation

The UK Government should review and consider the circumstances for emergency proxy applications, including the deadline for receiving such applications.

IER and the implications for absent votes

7.29 Following the introduction of IER, anyone with an absent vote had to be IER registered. As a result, any electors who were carried forward onto the 1 December 2014 register and therefore not IER registered had to have completed an ITR or registered on line and become an IER elector for them to continue with their absent vote arrangement. However, if their IER application had failed verification, legislation allowed them to bring documentary evidence to the ERO up until 10 pm on polling day and be issued with their postal vote pack for the elections⁴⁵.

"The issue of postal vote packs for IER applications turning red to green was a constant issue on disrupting more general election work."

Consultant, North East and Yorkshire

"...absent votes we had to hand issue over 100 postal vote after our second issue due to the number of electors who had requested postal votes and then later turned green."

Democratic Services Manager, East Midlands

"Postal votes were a nightmare, having to check if electors had gone 'green' after -12."

Senior Electoral Services Officer, South East

"We received a lot of abuse from angry electors who had not provided the evidence requested. Most had been in the evidence queue for a couple of months and had received at least two requests to provide the evidence. Waiting for electors to go green made the postal voting process a bit messy."

Electoral Services Manager, South West

⁴⁵ Electoral Registration and Administration Act 2013 Schedule 5
"Electors did not understand evidence request if they had been on the register a long time. Electors not happy if they could not have a postal vote if a red match."

Senior Electoral Services Officer, Eastern

"All evidence requests in the last few days were delivered by hand. Wherever possible the outside enquiry assistant would photograph the evidence and e-mail back to the office. 134 postal votes had to be issued after day -6."

Electoral Registration Officer/Deputy RO, Wales

7.30 IER allows applications to register to be made online which is far easier and quicker. Whilst registering online, potential electors can also request a postal vote. However, this facility had significant issues as a result of the messaging on the IER website. Most potential electors, including overseas electors who can also register online, had assumed that, by requesting a postal vote during their online registration, they had arrangements in place for a postal vote. In reality, the request merely prompted the IER service to email a postal vote application form. This had to be printed off, completed by hand in order to capture the elector’s signature and date of birth, and then submitted to the ERO before the deadline of 5 pm on 21 April. For various reasons outlined in the quotes below, this resulted in electors being registered, but not receiving a postal vote as they had requested:

"... More clarity around receiving a postal vote application and completion. As people seemed to think the message ‘Your application is complete’ meant there was nothing else to do....."

Electoral Services Manager, South East

"Further tweaks to IERDS would be helpful to clarify postal voting as a number of electors believed they had applied via the online process."

Electoral Services Manager, Southern

"A lot of electors thought that answering yes to a postal vote online meant they had a postal vote BUT IT MEANT THEY WERE EMAILED OR POSTED AN APPLICATION FORM!"

Electoral Services Officer, Eastern

"Online registrations and requests for postal votes - People were under the impression that they had completed their
registration and postal vote online. As wording said 'There is nothing else you need to do'. In many cases it would appear the email with postal vote application was then going into spam boxes and electors did not realise there was something else to complete."

Electoral Services Manager, South East

"Customers did not realise that ticking the online form for a postal did not actually give them a postal application. They did not understand the process that an application form would be sent to them which they would then have to complete and send to the Local Authority. Timetables deadlines etc. should have been identified and a special message for people going on holiday "if you are going on holiday, please contact your local authority to find out when postal vote papers will be released"."

Elections Officer, North East and Yorkshire

"Some electors thought the wording of the confirmation letter was confusing as it said they didn't need to do anything else. As it was received after they had been emailed a postal vote application form, they thought they didn't need to return the application to receive a postal vote."

Electoral Services Manager, Eastern

7.31 In addition, anyone who registered online on the last day to register (20 April) had to be subjected to the five day objection period before that applicant was officially placed on the register. This meant that anyone with a postal vote application in such circumstances would not have their postal ballot paper pack posted out until 28 April (polling day – 6) in case any objections were received. As a result, this had implications for electors going on holiday, or overseas electors who had registered on the last day but requested their postal vote to be sent abroad. This meant that in some cases there were only six days for the postal vote pack to be posted out abroad, completed and returned in order for it to be counted.

"Postal votes went out too late for registrations on day -12. Electors complained not enough time to return them."

Senior Electoral Services Officer, Eastern

"Overseas electors registered on the registration deadline and then were angry when they also missed the postal vote absent vote deadline."

Electoral Services Manager, Eastern
"A large number of overseas voters came onto the register just before -12, most did not have postal votes. The warnings that postal votes for late applications will not be sent until -7 or -6 are inadequate."

Elections & Information Manager, Southern

"The impact of overseas registrations cannot be overstated. It was massive. I had one member of my team (out of 5) full time on this for weeks and another member to help. The volume was bigger than ever and the queries that arose were numerous. The messaging on the website or the system must be improved. Electors with huge discrepancies between when they left and when they were registered because they don't supply the correct previous address (giving a family home, or guessing they weren't registered somewhere when they actually were). We have to look these up on paper in many cases. Applying for postal votes to the other side of the world, in many cases we advised this wasn't practical and they did apply for proxy votes instead but this is an increased amount of work. Not applying for a postal or proxy vote, again we started advising that they had not done this and most were grateful as had not checked their email after registering. Applying on the last day and then their postal vote cannot go out instantly because of the objection period! We were aware that it would never reach them on time but what are we supposed to do? Then the complaints because their vote has not arrived, wanting to know what alternatives they can be provided with."

Senior Electoral Services Officer, South East

7.32 The processing of checking IER documentary evidence and the attestation process up until day -6 had significant staff resource implications at a time when at previous elections those staff would have moved off registration to prepare for the elections after day -12.

**Recommendation**

The UK Government should review the current timetable in relation to the deadline for applications to register, the objection period and the deadline for applications for an absent vote arrangement, especially when being sent abroad.
8 Standing for election and the campaign

Standing for election

8.1 Electoral administrators reported that there were many more first-time candidates at this election and that there was a general lack of understanding amongst candidates and agents of the process of standing for election especially at local and parish level.

"Highest level of new candidates standing. It was decided to hold an early candidates & agents meeting which helped them understand the process. This was followed up by weekly emails from myself on what needed to be done and deadlines. The informal checking of nomination forms ironed out any problems before formal submission but very time consuming."

Electoral Services Manager, Wales

"New parties and individuals found the process overwhelming and did not understand it fully. They needed a lot of support from us."

Elections Manager, North West

"No issues, a few inexperienced candidates who needed additional support but the briefing pack well in advance of the election along with a thorough presentation assisted and reduced the number of queries."

Electoral Registration Manager, Wales

"There were issues with inexperienced candidates/agents particularly in one constituency where we had the biggest ballot paper in the country. However with no local elections this was not an issue as the number of candidates totalled 25 in the three constituencies so was entirely manageable."

Electoral Services Manager, London

"A huge increase in the number of inexperienced candidates and election agents who have less idea about electoral registration, elections, rights and responsibilities. This has increased the amount of work we have to do to explain (and justify!) the layout of the register and explain that we cannot simply add markers and fields that are not there already. Some candidates have questioned why the 'qualifications' to stand are as they are, others have said they will find a way
around them. Many new candidates and agents do not seem to have much support from their parties.”

Deputy Returning Officer, South East

"….Lots of inexperienced candidates and agents at local level completely unaware of nomination requirements and political party implications.”

Democratic Services Manager, Southern

8.2 It appeared common practice that ROs provided candidates and agents guidance and briefings, with some reporting they held more than one briefing, along with additional support on request.

"Worked very well - we had 2 briefings before and after nominations and met with parliamentary candidates/agents on a 1:1 basis on request.”

Electoral Services Manager, North West

"We had two meetings with the candidates / agents so they fully understood the process.”

Electoral Services Manager, London

"Many inexperienced agents even for main parties. Had to run 2 agents meetings then they kept asking basic questions.”

Head of Electoral & Member Services, London

"Held a briefing for candidates and agents before nomination and took them through all the paperwork etc. Held another briefing to explain the count process. Both were well received and there were no problems.”

Democratic Services Team Leader/DRO, Scotland and Northern Ireland

"A filmed briefing on the web for the large numbers of district and parish candidates received good feedback. The number of candidates unable to fill out a nomination form properly was huge. The informal checking process was valuable but time consuming.”

Democratic Services Manager/DRO, North East and Yorkshire

8.3 The Electoral Commission provided their usual guidance for candidates and agents, along with a powerpoint template for ROs to
use for briefing candidates and agents. However, it was reported at the start of the nomination process that there was a discrepancy between the two sets of guidance.

"The EC powerpoint presentation for Candidates and Agents says that the Candidates details and description should be entered on the form prior to the assentors signing. The EC Guidance for Candidates and Agents doesn’t contain that information. Therefore, only those Candidates and Election Agents Briefing have been advised of this. This lack of consistency is causing issues."

Head of Democratic Services, South East

8.4 The nomination form slide in the candidates and agents briefing was far more precise in relation to the completion of the nomination paper and clarified the situation compared to the guidance which omitted the words “name and description fields”. This shown below in the extracts:

Slide – Nomination Form⁴⁶
Only ask subscribers to sign after completing the name and description fields on the form.

Guidance – Paragraph 1.98⁴⁷
Nomination forms should not be altered once they are subscribed. All of your details should be completed before you invite anyone to subscribe your nomination. Once the (Acting) RO has formally accepted a nomination form, signatures cannot be withdrawn.

8.5 As the issue was discovered at the start of the nomination process, it was raised with the Electoral Commission suggesting that they circulated an update providing further clarification to political parties, place a note on their website and with their guidance. The Electoral Commission did not circulate any clarification, but advised they would take any feedback into account in preparing their guidance for future elections.

Delivery of nomination papers

8.6 The Electoral Commission guidance in relation to the delivery of nomination papers states that:

⁴⁶ EC Candidates and agents briefing
⁴⁷ EC Guidance for candidates and agents
“The nomination form and consent to nomination must be delivered by hand and cannot be submitted by post, fax, email or other electronic means. Where a document is required to be delivered by hand, this can include delivery by a courier.”

“You should take steps to communicate the requirements relating to delivery of nomination papers to all prospective candidates and agents, and ensure that these requirements are highlighted in any local briefings or guidance you produce. At parish council elections, you could consider liaising with the parish clerk who may be able to help communicate the requirements for the delivery of nominations to prospective candidates and to provide assistance with the delivery of nomination papers, if needed.”

8.7 Some local authority areas with parishes are very widespread, with significant distances between them and the RO’s office. At previous parish council elections, candidates were able to post their completed nominations via Royal Mail. In some areas it is very difficult for a parish council to receive enough nominations to fill the number of vacant seats on the council. Nomination papers having to be hand delivered is an obstacle to democracy and, in some cases, could mean only candidates who can drive and have access to a car can stand for election, particularly where there is no public transport available in those rural areas.

"Delivering nominations in person is extremely difficult for many people, particularly in a large rural area.”

Electoral Services Officer, South West

"Delivery of nominations in person meant that some parish nomination papers were not accepted. Despite trying to phone people we couldn’t get them to deliver them in time. Those who we did contact were annoyed that they had to come and "deliver" a nomination paper that was already in our possession...”

Head of Resources, East Midlands

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48 EC Guidance - Part C Administering the poll
"Delivery by hand is ridiculous in a large rural area. We dealt with 651 nominations in an 11 day period – most handed in individually although some "bulk" deliveries helped…"

**Electoral Services Manager, South West**

"Delivering nominations in person was a challenge for the parish areas, but we stuck to the rules and they adhered, albeit disgruntled…"

**Elections Manager, North East and Yorkshire**

"My reputation amongst the parish councillors around these parts is permanently damaged after I made them deliver their nomination forms by hand. You’d have thought I was Joseph Stalin’s reanimated corpse by some of the rough treatment I received… especially when the local landed gentry arrived en masse (never before have I seen such a fine display of yellow trousers) and gave me a damn good talking to.”

**Policy & Governance Manager, West Midlands**

8.8 In March 2015, the AEA responded to the Law Commission – *Electoral Law: A Joint Consultation Paper* supporting the following provisional proposal, subject to wider definition, to indicate the alternative methods of electronic technology:

- The nomination paper should be capable of being delivered by hand, by post or by electronic mail⁴⁹.

**Recommendation:**

The UK Government should review the requirement for hand delivery of nomination papers.

**Nomination papers and subscribers**

8.9 Nomination packs are available from the Electoral Commission website and many ROs use the standard forms that are available. As already reported there were a lot of inexperienced candidates who needed additional support during the nomination process. Unfortunately, the Electoral Commission nomination paper template does not ask for contact details which would have assisted administrators during the nomination and election process.

“No major problems except how busy and time consuming it all was. The nomination forms by the Electoral commission could have been better as there was nowhere to include contact details.”

Democratic Services Manager, East Midlands

“Every local nomination paper was wrong - that has never happened before! This meant that the time for informal checks (where we expect the form to be handed in at the end) was doubled because most had to come back again. The biggest issue was 'Description' field = people don’t know what it means. We had hoped that by putting the NoE up early, more local papers would be submitted before the parliamentary process started. That didn’t work. Both were last minute. Some parliamentary papers were wrong - mainly proposers etc, and deposits were forgotten.”

Election Manager, North East and Yorkshire

“Generally forms are very poorly completed despite all the guidance. The main problem is the complete lack of understanding of the word 'description'. The legislation needs to be changed so that it is clear to people when completing the form that this means more often than not the political party description. I lost count of the number of nominations I sent back for resubmission on informal check as they had this box blank and subscribers had completed their signatures without the description filled in. To be honest I think the subscription by proposer, seconder and assentors is outdated and unnecessary. 10 people signing a nomination form is hardly an endorsement of a candidate's suitability to stand.”

Deputy Acting Returning Officer, North East and Yorkshire

“Pages of legislation needing to be submitted with nomination forms. I feel that this is unnecessary and bureaucratic, particularly as candidates are signing to say that they are not disqualified, etc elsewhere on their nomination forms - many candidates simply had not brought this with them and we ended up having to supply them with copies.”

Electoral Services Manager, Southern

8.10 In March 2015, the AEA responded to the Law Commission – Electoral Law: A Joint Consultation Paper supporting the following provisional proposal:
• A single nomination paper, emanating from the candidate, and containing all the requisite details including their name and address, subscribers if required, party affiliation and authorisations should replace the current mixture of forms and authorisations which are required to nominate a candidate for election.\(^5\)

8.11 The AEA also supported the following provisional proposal:

• Subscriber, where required, should be taken legally to assent to a nomination, not a paper, so that they may subscribe a subsequent paper nominating the same candidate if the first was defective.\(^6\)

8.12 Additionally, in view of this proposed change, the AEA would also welcome guidance for candidates to ensure that they do not entirely duplicate the initial nomination paper for their second nomination paper as the same error may be repeated. Consideration should also be given to removing the need for details from a second and/or third nomination paper to be published at a UK Parliamentary election.

8.13 The issue of the need for candidates to have ten people to subscribe their nomination paper was also raised along with whether a candidate could nominate themselves. Removing the requirement for subscribers would make the nomination process much simpler and more efficient both for candidates and agents and for ROs, and remove the need for checks on subscriber details. It was recommended in the AEA report “Beyond 2010: the future of electoral administration in the UK” that the UK Government should bring forward legislation to remove the requirement for subscribers on nominations.

8.14 We received several comments including the last quote above by a Deputy Acting Returning Officer in the North East and Yorkshire.

“.......The fact that legally you can nominate yourself and some people did in parishes also caused some queries. We requested appointments to bring in nominations for the check, which worked fairly well, although some people just turned up and then complained they had to wait!”

Democratic Services Manager/DRO, North East and Yorkshire

\(^6\) Law Commission – Electoral Law: A Joint Consultation Paper – Provisional Proposal 7.4
“A potential candidate wanted to subscribe to his own nomination on the parish as seconder. EC advice was that is allowable if he fulfils the requirements to be a subscriber but by the time we got the advice the close of nomins had passed. The chap in question was happy not to pursue it.”

Electoral Services Manager, South East

8.15 As a result, the AEA reinforces its recommendation from 2010.

**Recommendation:**

The UK Government should bring forward legislation to remove the requirement for subscribers on nominations.

**Commonly used names**

8.16 At previous elections, ROs had accepted middle forenames as commonly used names during the nomination paper process. However, an issue arose this year following the Electoral Commission guidance produced for ROs in relation to commonly used names on nomination papers. Arising from this issue, the Electoral Commission Bulletin 99 (England and Wales) was issued on 6 March and stated:

“The legislation makes it clear that a commonly used name is one which is different from any other forename or surname. This means that a forename in its original format cannot be used as a commonly used name. If a candidate wishes to use a commonly used forename and/or surname then these must be different from their full name as it appears on the nomination paper.

Therefore, in the case of Andrew John Smith, he could not use Andrew Smith as his commonly used name, although he would be able to use Andy Smith (if Andy was the name by which he is commonly known).”

8.17 The Notice of Election for local elections had to be published by no later than 30 March. Following publication, nomination papers could then be received. Some ROs publish their local election notice earlier than the latest date to allow the early delivery of local nomination papers given the volume anticipated at local elections. The UKPGE Notice of Election had to be issued by 4 pm on 2 April

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52 EC Guidance - Part C Administering the poll
53 Electoral Administration Bulletin Issue 85(S) & 99(E&W)
and could not be issued until the Writ had been received. On 30 March, when local nomination papers were already being received, the Electoral Commission issued Bulletin 103 (England and Wales) which stated the following:

“Following a number of queries on the commonly used names provisions, we re-stated our advice in Bulletin 99 and have also sent a separate communication on this to the parties. We have since received a number of follow-up enquiries about what the (Acting) RO’s powers are if they receive a nomination form on which a candidate has used the commonly used name provisions to drop their forename or surname.

It is our view that (A)ROs do not have discretion to reject a nomination form on the basis that they think that the candidate has wrongly used the commonly used name provisions to drop their forename or surname. It is not for the (A)RO to decide whether the commonly used name is a ‘name’ or whether it meets the legal requirement to be different from any other name they may have.

The law requires (A)ROs to take whatever a candidate has entered in the commonly used name box at face value and to accept it as the candidate’s commonly used name. The commonly used name provided on the nomination form must be carried forward to the statement of persons nominated and the ballot paper unless the (A)RO thinks that:

(a) showing a candidate's commonly used name on the ballot paper is likely to mislead or confuse electors; or
(b) the commonly used name is obscene or offensive.

At candidate briefings, (A)ROs should remind candidates that, by law, a commonly used name is one that is different from any other forename or surname they may have.

If, at an informal check stage, (A)ROs are presented with a nomination form that has been completed in such a way that it appears to the (A)RO that the commonly used name given is not different from any other forename or surname they may have, the (A)RO should draw the candidate’s attention to the legal definition of a commonly used name and highlight that it is an offence to knowingly make a false statement on the nomination form. The (A)RO should also point out that if a nomination form is not completed in accordance with the law, the candidate will run the risk of challenge if they are elected.
It is the candidate’s responsibility to ensure that they have completed their nomination in accordance with the law."

8.18 Numerous administrators raised this issue with the following concerns and comments in relation to the guidance:

"Although already raised with John Turner, I am very concerned about the new guidance from the EC on the use of the commonly used name. I believe originally one of the reasons this was introduced was to allow someone who had a first and second name and was known by their second name to have that clearly on the ballot paper. Example: John Smith has been known as John Smith all his life but was born David John Smith. He is clearly known by everyone as John Smith and so wants his name to be printed without the name David. Ever since the introduction of this legislation most authorities have been allowing this. I would be interested to know, if legal advice was taken by the EC, exactly what the response was, who gave it and whether they were presented, when asked, with all the common scenarios. Staff at [x] have attended a number of training sessions on nominations and this was not raised as an issue - suddenly after all these training sessions, the EC are asked a question and this is typical of ill advised guidance which results, in my opinion, far too late."

Deputy Acting Returning Officer, North East and Yorkshire

"EC guidance on use of commonly used names conflicted with their earlier guidance, contradicted itself. Our RO made a decision not to allow commonly used names where it was the same is the first name (where candidates try and get rid of the middle name on the ballot paper). EC need to be clearer on this and the nation needs to stick to a rule."

Elections Manager, North East and Yorkshire

"Only issue was a number of candidates believing it was unfair not to be allowed to be known by their middle name - commonly used issue"

Electoral Services Manager, Wales

"Commonly used names - if someone is called Albert John Smith but is known as John Smith I cannot understand why he can’t opt for John Smith on the ballot paper. The

54 Electoral Administration Bulletin Issue 89 (S) & 103 (E&W)
legislation was surely devised to help electors identify the candidate. Why should someone who is called Rosemary Anne Smith be allowed to put Rosie Smith on the ballot paper but in my first example the candidate would have to have Albert Smith - which no-one knows him by. Unless things are changed you will get nomination papers with bits of names to suit what the candidate wants on the ballot paper which isn't what the nomination paper asks for. Someone who commonly uses a name which is not their first name shouldn't be disadvantaged and at the moment they are…”

Senior Electoral Services Officer, Eastern

"Having been open to "informal" nominations last week, and bearing in mind the EC guidance which reinforces the legislation, I have advised one agent that a commonly used name that is not different from one of a candidate's actual names, is not allowed. My legal advice to back up my position says the nomination is therefore not completed as required by law. (I am aware of the RO ruling on commonly used names that are offensive, obscene etc. as a separate issue). Whilst my agent is awaiting further EC guidance, as was I which was promised on Friday 13, he wants to wait before he "formally" submits those nomination papers that are affected. I have advised obviously re: use of his subscribers by someone else. His National Nominating Officer agrees with me, but as this will affect Parliamentary Candidates is thinking of obtaining a "legal ruling". My local notice of election is published today (16 March). …We may have accepted "commonly used names" in the past which were the same as another of the candidate's names.”

"Further to my previous post re “commonly used names”, and in the run up to Parliamentary nominations opening received conflicting advice from EC....”

Electoral Services Manager, Eastern

"Commonly Used Names - We previously allowed the use as middle names as commonly used names and thought this was ok in accordance with the legislation along with colleagues in neighbouring authorities. EC Bulletin 99 raised an issue on this although the guidance in the bulletin was unclear. Our leader is known by his middle name as is several other members and we have been under pressure to accept middle names as commonly used names. We took Counsels opinion which confirmed that this could not be done and we made this
clear to the Leader and other members and have been receiving nominations on this basis since 23 March. If a candidate has put a commonly used name that is not allowed we have advised them of this and ignored the name provided. However new EC circular 103 has proved greater problems for us as the leader has seen this and now wants to still use his middle name as a commonly used name as the guidance says we would have to accept it if submitted on his nomination. Whilst I don't agree as the counsel's opinion would appear clear and that we couldn't accept a commonly used name that is the same as one of his other names provided on his nomination paper we are being put under a lot of political pressure and this whole issue has taken up a great deal of time and is still unresolved.”

Elections Manager, East Midlands

“There needs to be further clarity on commonly used names on ballot papers. We had several candidates who are known by their middle names. They were allowed to have only this name showing on the ballot paper. However, candidates who were known by their first name and did not want their middle name to be shown on the ballot paper were not allowed this.”

Elections Officer, East Midlands

“The commonly used names caused problems this year as most candidates complete this section simply to exclude their middle name from the ballot paper. If you allow all of the requests the notices and declaration start to look ridiculous and reading out the results takes for ever.”

Electoral Services Manager, South West

Recommendation

The UK Government should review the use of commonly used names, so that a forename can be used as a commonly used name on a ballot paper.

Party Emblems

8.19 Political parties register their party, party descriptions and party emblems with the Electoral Commission. Requests can be made to change these at any time and the law does not prevent changes to emblems being made throughout the nominations period. The
emblems to be used on the ballot papers are those that are in force at the close of nominations.

8.20 Candidates can choose if they wish to have their party emblem displayed on the ballot paper against their name and can also choose which registered emblem to use.

8.21 Electoral administrators and printers download from the Electoral Commission website the party emblems for the production of ballot papers. At previous elections, there have not been any significant issues in relation to the use of party emblems. However, for the elections in May this was one of the most significant issues and problems raised by electoral administrators, largely because of a late change to two political party emblems, namely, from the Green Party and the Liberal Democrats. This resulted in the re-proofing of ballot papers and the re-printing of ballot papers in many cases which, in turn, had a knock on effect resulting in delays with the despatch of ballot papers, delays in the sending out of postal votes and, in some cases, errors on ballot papers which were otherwise correct except for the emblem.

8.22 The deadline for nominations, withdrawal of nominations and to request a logo was 4 pm on 9 April. ROs would then send their ballot paper data to their printers for preparation and then for proofing immediately and then production of the ballot papers once the proof had been signed off either on the same night or during the following day. Following the introduction of the early despatch of postal votes, there is even more pressure on administrators to print ballot papers as soon as possible. In most cases, neither the electoral administrators nor the print industry were aware of the two emblem changes that had been uploaded to the Electoral Commission website on 8 April. The Electoral Commission did not issue a bulletin to advise of the two emblem changes until 10.45 pm on Friday, 10 April, i.e. the day after close of nominations.

8.23 In our view, the Electoral Commission should have issued an urgent notification as soon as it became aware the emblems had been approved and the uploading to the website should have taken place immediately approval had been given. Given everything else there is to do, electoral administrators and printers cannot be expected to check each registered political party logo on the Electoral Commission website to see if it had changed or not before close of nominations. The strength of feeling amongst electoral administrators was demonstrated by the number of reports received on this issue, a sample of which is shown below. The deadline for changes for party descriptions and party emblems should be well
before the date for the publication of the Notice of Election, so that even those ROs who publish their notice early are in a position to download the emblems into their electoral software in plenty of time before the first nomination paper is received, with the certainty it cannot change after being downloaded.

"EC Logos - it would appear that they were updated on 8 April - with some amendments to two of the major parties (lib dems and greens). We did not see this - there was no alert, nothing (though there was an urgent alert about something else). We proofed all of our ballot papers (here until after 10pm tonight). Only to receive a bulletin from the EC TODAY [10 April], nearly 24 hours after close of nominations, to alert us to the changes. We are in complete meltdown here trying to work out what we need to do now, on a Friday afternoon. So unhappy.”

Electoral Services Officer, North East and Yorkshire

"EC only announced a party emblem had changed AFTER our parliamentary proofs had been approved - costing half a day of work and 24000 ballot papers that need to be reprinted. The EC should lock down the database at the start not the end of nominations, or should tell us when it is changed - not 24 hours later! Grrrr.”

Deputy Returning Officer, South East

"Consideration to not allowing parties to change their emblems and descriptions so close to the deadline for nominations must be given serious consideration. There is enough work to be done in checking nominations. Increases margins of error on ballot papers.”

Electoral Services Manager, South East

"Emblems an issue as we downloaded Lib Dem form a few days before close of nominations, but it was still the old version. Needed to re-run parliamentary ballot papers which caused problems for our printers. Emblems should set at notice of election and not close of nominations.”

Electoral Services Manager, South West

"Late party registration and logo changes causes problems. This process should be completed before the Notice of Election is issued.”

Electoral Services Manager, South West
"Receipt of a bulletin from the EC at 12.59pm the day after the close of nominations (Friday 10 April) informing us that they had changed some party logos late in the day on 8th April (the day before close of nominations) - we had to put a halt to the printing of ballot papers due to the last minute change. There was no notification from the EC on the 9th April to highlight this fact. Our printer had checked all of the logos on the morning of 8th April and had those all up to date. We received a final file of logos from our software company in the evening of 8th April and there was no inclusion of the amended Lib Dem or Green Party logos. It is unacceptable that parties can be allowed to make such changes at that late stage. It is also unacceptable that the EC did not highlight this as an urgent matter - to inform us about this the day after the close of nominations, via a small paragraph in their regular bulletin, is completely out of order. When we are under pressure to send out overseas postal votes at the earliest possible opportunity, we begin printing ballot papers as soon as possible after the close of nominations. When we became aware of this and we tried to get on the EC website to check what had changed, we couldn't get onto the site as it had gone into beta testing. We are now working on a solution but need to highlight the major impact this has had."

Electoral Services Officer, North East and Yorkshire

"EC notifying us of an emblem change by two political parties (green party and liberal democrats) after nominations had opened and ballot papers formatted - not helpful and causing chaos with printers producing all new artwork. We had downloaded their file once Notice of Election was published and would not have expected them to agree to the change or at least forewarn us of the possibility."

Electoral Services Manager, Eastern

"The late advice from the Electoral Commission regarding the Political parties changing logo's. This was completely unhelpful and caused no end of problems to Administrators and printers."

Electoral Services Manager, South East

"Party descriptions & emblems. The ability for this information to change up to the close of nominations is not
very helpful, to say the least. It would have been nice if, amongst the mass of information they issue, the EC had issued a notification advising us emblems for major parties had changed.”

**Electoral Services Manager, South West**

"...Given the timescale around nominations and providing candidates details to printers it is madness that parties can change their logos and party names etc until so late in the process. This is a legislative matter that should be changed. It impacted us indirectly in that we were asked to reproof our ballot papers which had been correct initially only to find errors had been introduced.”

**Electoral Services Manager, North West**

"Emblems too late in the process to change, should be much earlier cut off date.”

**Democratic Services Manager, Southern**

**Recommendation:**

The UK Government should review the deadline for applications to change party descriptions and emblems, so that it is set at a date which ensures the Electoral Commission website is updated well before the first nomination paper is received.

**Home address form**

8.24 As part of a Parliamentary candidate’s nomination, the candidate must complete a home address form and deliver to the RO by close of nominations. There is no prescribed form, but on the home address form the candidate must state their name and home address. The address does not need to be in the constituency in which the candidate intends to stand.

8.25 The home address:
- must be completed in full
- must not contain abbreviations
- must be their current home address
- must not be a business address (unless the candidate runs a business from their home)

8.26 A candidate may, if they choose, sign a statement on the home address form stating that they require their home address not to be published on the statement of persons nominated or the ballot paper. In this case, the home address form will contain, as well as the full name and home address:
a statement, signed by the candidate, which states that they require their home address not to be made public;
- the UK Parliamentary constituency or, if they live outside the UK, the country in which their home address is situated.

8.27 If the candidate chooses not to have their home address appear on the statement of persons nominated and the ballot paper, the constituency in which the candidate’s home address is situated or, if they live outside the UK, the country in which they live must be printed instead.

8.28 Whilst there is provision in law to allow the candidate’s home address to be kept secret should they wish, this only applies to candidates who formally appoint an election agent to act on their behalf. Any candidates who do not formally appoint an election agent by the deadline (which is the same deadline as for the receipt of nomination papers), automatically become their own agents. The consequence of this is that, whilst their home address will not appear on the ballot papers or the statement of persons nominated, it will appear on the notice of election agents which is displayed and available to the public from the local authority website, council offices notice board and polling stations.

"On my reading of the current provisions, there is an absurdity where a candidate uses a Home Address Form to conceal his/her home address acts as his/her own Election Agent. It would appear necessary for the full home address to be published in the details of the Agent."

Depute Returning Officer, Scotland and Northern Ireland

Recommendation

The UK Government should review the home address provision in relation to the nomination process for candidates acting as their own election agent.

Deposits

8.29 At a UKPGE, a deposit of £500 per candidate must be paid by the close of nominations. The RO has some discretion over how to accept the payment of the deposit. Payment must be accepted where it is made by legal tender (cash in British pounds only) or a UK banker’s draft. An RO may refuse to accept a banker’s draft if they do not know whether the drawer carries on business as a banker in the United Kingdom. The RO can choose to accept funds by means of a building society cheque, a debit or credit card or the
electronic transfer of funds if facilities are available to the RO, although they are not required to. An RO should accept building society cheques if they carry out business in the United Kingdom. An RO should also accept banker’s payments, which are orders issued by a bank guaranteeing payment to the recipient. All methods of payment should be listed on the notice of election and made clear in the nomination pack.

8.30 On 30 March, the EC issued bulletin number 103 (England and Wales) which reminded administrators of the legislative provision relating to the payment of deposits. At the elections in May, an issue arose in relation to the format of a banker’s draft and what it should look like:

"There was an issue with the deposit from the [x] party, we are still not sure what we accepted was a banker's draft, although they say it was. The EC were clearly consulted because of the revised wording they used in their bulletin just before - why could they not have told us that ‘x’ were bringing something that looked like a cheque but wasn't.”

Senior Electoral Services Officer, South East

"Issue with [x] Party Candidate deposit. Regional party insisted bank cheque was equal to banker's draft. When paid in yesterday morning (7 April) Nat West cashier informed finance cheque wouldn't be cleared until Monday. Further conversation with account manager confirmed all cheques even if guaranteed or counter cheques take 4 days to clear and all have to go through process, even banker's draft. Difference is banker's draft can't be stopped, all cheques can. Local agent has now paid by card although regional party was still insisting cheque was guaranteed and we should accept. Think this whole issue around cheques and banker's drafts needs to be reviewed by EC as timescale for Parliamentary nominations meant cheques could not be cleared by 4pm deadline on Thursday even if received on 2 April. I have informed EC of the issue as regional party seemed to think their bulletin covered it.”

Electoral Services Manager, South East

**Recommendation:**

The UK Government should review the issue of deposits for all elections where they currently exist.
9 Public awareness and participation

9.1 In order for eligible people to vote at an election, they must register. There are choices in how they then exercise their right to vote.

9.2 In order to stand for election, prospective candidates need to submit a nomination and comply with the legal requirements governing their responsibilities as a candidate.

9.3 In all cases, to engage effectively with the electoral process, people need to understand how and what to do, and when to do it.

9.4 The Electoral Commission has a statutory duty to “promote public awareness” of current electoral systems in the UK by “carrying out programmes of education or information”. In addition, local electoral officers (EROs and ROs) have a statutory duty “to encourage the participation by electors in the electoral process in the area for which [he/she] acts.”

General public lack of awareness of the electoral process

9.5 The AEA has not undertaken any public information research to inform this report. We are aware that other bodies such as the Electoral Commission and academic institutions do undertake this kind of research.

9.6 However, administrators are well placed to comment on many aspects of public lack of understanding of the process as they respond to public enquiries on a daily basis. The comments received by the AEA indicating a lack of awareness include the following processes and information:

- That registration is required in order to vote (and to apply for absent voting facilities);

  "Very frustrating when electors could not vote because they had ignored all our efforts to get them IER registered. Several proxy forms remained invalid due to this despite contacting those concerned."

  Senior Electoral Services Officer, South East

- Receiving a poll card advising them of the election and yet still going online to register again thereby creating a duplicate application;
"A significant percentage of registration applications were found to be by people who were already registered. Would it be possible for future advertising to encourage people to apply to register "if you have not received a poll card or you are not already registered" or similar?"

*Electoral Services Officer, South West*

- The registration and absent voting deadlines;

  "Total Number of IER applications received too late for registration (on or between E-11 and E) 1859."

*Interim Electoral Services Manager, London*

- That more than one election may be taking place in their area and their eligibility to vote in the respective elections;

  "The main thing I have heard from people following the election is about the lack of awareness regarding local elections taking place on the same day. Many people did not expect or understand why they received more than one paper and this meant they were impatient when waiting to be issued with papers as they could not understand what was taking so long for people ahead of them."

*Elections and Land Charges Team Leader, Eastern*

"I really believe that the Parliamentary election shouldn't be combined with any other elections. The majority of the public were only concerned with the parliamentary and couldn't understand the different papers and multi member wards and the number of parish candidates. Postal voters were confused that they received 2 postal votes (parliamentary and district) then even more confused when they received another one for parish. Most voters didn't understand the different levels of elections and weren't particularly interested in parishes."

*Elections Manager, Eastern*

"....EU electors – I have 23,000 of these and we did actually have hundreds of calls on this on polling day itself." [UKPGE only]

*Head of Electoral Services London*
• That postal ballots cannot be printed and supplied until after the close of nominations; and

"The deadline for applying for a postal vote needs to be looked at. Despite issuing before the deadline and as soon as we could given when the ballot papers were available, many people were unhappy we did not issue earlier, especially overseas electors."

Electoral Services Manager, Eastern

• That voters cannot vote for ‘national figures’ at the General Election unless they happen to live in the constituency in which a national figure, such as the leader of a political party, is standing.

".... Some voters did not understand why the names of David Cameron or Ed Miliband were not on the ballot paper...”

Electoral Services Officer, South West

**Electoral Commission campaigns**

9.7 The Electoral Commission ran a public awareness campaign ahead of the May 2015 polls. Their TV campaign ran from 16 March to 17 April which included online catch up TV running between the same dates. Their online display campaign was launched on 2 February and ran until 20 April. The campaign also included targeted media and messaging for specific audiences.

9.8 Feedback from administrators suggests that, in one respect, the campaign by the Electoral Commission was successful – it generated significant volumes of last minute applications to register and to vote by post.

"I believe the EC campaign worked really well this year, lots of electors commented on seeing the adverts on TV and social media.”

Electoral Services Manager, Wales

"The EC social media and TV campaign was very good. Our comms department were brilliant at communicating the need for registration.”

Electoral Services Officer, West Midlands
9.9 However, the volume of duplicate applications for registration indicates that voters were also confused as a result of the campaign.

9.10 Administrators experienced complaints from members of the public who had registered online on the run up to the deadline, requesting a postal vote. They had assumed that they had automatically registered for a postal vote and had not realised they in fact had to complete a paper postal vote application form. This was particularly noted in relation to absent voting arrangements for people living overseas, as was covered in detail earlier in this report.

9.11 It was evident throughout the campaign that there was a spike in online registration applications immediately following campaign activity, for example, a TV advert. The Electoral Commission also reported that Mondays were generally the most popular days for people to use the online registration site and, as a result, they ran some Facebook advertising targeting attainers primarily on Mondays, to take advantage of this trend.  

9.12 An earlier chapter has already referred to the National Registration Day that was held on 5 February 2015 and which was publicised by the Electoral Commission, Cabinet Office and local authorities. As a result 166,000 applications to register were received in that one day.

9.13 However, the ability to register online easily and the wording of the above two campaigns meant that a lot of applications received were duplicate applications made by electors who were already registered and were not new registrations, as covered earlier in the report.

9.14 The Electoral Commission published a report “Electoral Commission UKPGE 2015 Public Awareness Campaign: Results and Implications for Future Campaigns” which included the following data in relation to the registration target and results following their campaign:

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55 Electoral Commission UKPGE 2015 Public Awareness Campaign: Results and Implications for Future Campaigns
### Campaign Strand, Target, Timeframe, Results as at 26 May

<table>
<thead>
<tr>
<th>Campaign strand</th>
<th>Target</th>
<th>Timeframe</th>
<th>Results as at 26 May</th>
</tr>
</thead>
<tbody>
<tr>
<td>Great Britain</td>
<td>1,000,000 additions to the electoral register</td>
<td>16 March – 20 April</td>
<td>2,485,792 online and estimated paper applications*</td>
</tr>
<tr>
<td></td>
<td>1,000,000 online applications</td>
<td></td>
<td>2,296,530 online applications</td>
</tr>
<tr>
<td>Overseas</td>
<td>100,000 additions to the electoral register</td>
<td>2 February – 20 April</td>
<td>94,738 online and estimated paper applications**</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>10,000 additions to the electoral register</td>
<td>1-20 April</td>
<td>2,500 forms downloaded from aboutmyvote.co.uk and EONI.org.uk***</td>
</tr>
</tbody>
</table>

* We will be able to determine the final number for how many applications are additions when we complete our analysis of the register by the end of June 2015.

** We are using an estimate for the portion of paper applications submitted by overseas electors based on this being around 1.6% of the total number of paper applications submitted.

*** We will be able to determine how many form downloads resulted in additions when the Electoral Office for Northern Ireland completes their analysis of the register.

9.15 Upon reading the Electoral Commission report, the figures appear very impressive. However, whilst it mentions at * that the final number of additions will be known at the end of June, the report does not refer to how many or what percentage of the applications were duplicate applications following the National Voter Registration Day. The additional work created by duplicate applications caused largely by the ease of online registration and the Electoral Commission campaign was considerable. The time required to process them when staff resources were already stretched undoubtedly had an adverse impact on the preparations for the elections. The Electoral Commission report also looks at implications for future campaigns. Unfortunately, there is no mention of considering campaign messaging to try to reduce the number of duplicate applications as a result of future campaigns.

9.16 Obviously, if an elector receives a polling card, it would mean that, at the time the poll card was generated, that elector was already included on the register to vote. The Electoral Commission should consider incorporating this message into their campaign material for future elections.

9.17 During the run up to the elections, there were some electors who were already registered who then registered online as a result of the campaign and then registered online again just to make sure
that they were registered. In effect, this created triplicate registrations for the same person.

"Duplicate registrations were a major problem over 60 percent of new applications from mid-March onwards were duplicates or triplicates people are unaware of the DWP’S involvement in registration they think a quick 2 minute online application and that is it........."

Electoral Services Support Officer, North West

**Recommendation:**

Consideration should be given to the wording of any national registration campaign prior to an election, to clarify that there is no need for an elector to take any further action if they have already received their polling card.

**Local campaigns**

9.18 The Electoral Commission provided participation resources for local authorities to support their public awareness work in encouraging voter registration and providing information on elections locally. These resources were for use by electoral administrators and their communication teams and included advertising templates and press releases. Also available were practical materials to encourage public participation in the electoral process such as posters, website banners, template tweets and a guide to using social media around polling day, along with other practical resources. Several reports were received on using the Electoral Commission resources.

"Our Communications section used campaign material provided by the EC and used the local press and social media to communicate with voters.”

Democratic Services Team Leader/DRO, Scotland and Northern Ireland

"Our Comms team were active in issuing press releases and putting up messages on Facebook and through Twitter. They also monitored Twitter particularly on election day so we could respond to any issues/comments.”

Electoral Services Manager, North West

"EC campaign supported locally with website and press releases.”

Electoral Services Manager, Wales
Another initiative that electoral administrators used to encourage participation included a polling station search facility on their local authority website, which advised the voter of their allocated polling station.

"The Polling Station search which was set up here at [x] with our IT Web team worked extremely well. There were 14,876 searches made between 1 April and 7 May 2015 with 6,032 made on polling day itself."

Head of Electoral Services and Elections, London

Reports were also received on other initiatives including a video being produced on the completion of the postal vote pack, a number 10 selfie booth, and an empty house poll card.

"We did a lot of work around voter registration and cut offs. We also prepared a video on the completion of the postal vote pack."

Election Office Manager, Scotland and Northern Ireland

"We had a very large campaign going into colleges & the university. We had a number 10 selfie booth that we took to events and was well received. We created a short video, bus & cinema advertising and several television & radio interviews. We used social media a lot as well; facebook, vimeo, utube, twitter etc."

Electoral Services Manager, South West

"We did an empty house poll card which worked really well..."

Head of Electoral Services, London

Communication in the digital age

The way we all communicate has changed over recent years. Information is more accessible now, as demonstrated above with the polling station search facility, Citizens can now register to vote online, although legislation will not currently permit online voting.

In recent years, individuals’ expectations have increased as a result of increased usage of digital applications. It should therefore be of little surprise that an overseas elector registering to vote online and, as part of that process, indicating they wished to vote by post, should expect to receive their ballot paper instantly. The fact is that a paper application to request a postal vote has to be completed and then sent to the ERO, while their registration application has to
be verified with DWP followed by a five day registration objection period. Only then can their postal ballot paper be posted abroad to their address, as requested – at best six working days after their application was made to register to vote.

9.23 The digital age also means that people now communicate via email 24 hours a day and expect instant responses. Email is far quicker and easier than having to write a letter and incur postage costs. As a result, the volume of email communication has increased significantly and the expectation has become for electoral services teams to be a 24 hour service. Whilst staff do work long hours preparing for the elections, the reality of email communications is that staff resources, with some background electoral knowledge and skill, are now having to be made available to respond to emails which could be time critical, especially when close to registration and absent vote deadlines.

"From the delivery of poll cards by canvass staff over the Easter weekend, the volume of e-mails received necessitated two staff constantly working on these, one dealing with those with attachments and one without. This continued throughout the rest of the period leading up to polling day including weekends. Spikes in those received were obviously around registration, postal vote and proxy vote application deadline dates, but knock on effect of televised Leaders debates brought a large number in the following days."

Head of Electoral Services and Elections, London

9.24 These staff resources are often having to be taken away from preparing for the elections during the working day, with the consequence that the election preparations are having to take place out of normal office hours during evenings and at weekends.

"In the last week of registering for the election we had between two to three thousand applications to go on the Register (in addition to the thousands of duplicates). Four of the six staff worked solidly at the registration issues with just two of us left to work on the election. The public perception was that we should be there for them 24/7 and we found that we needed to monitor emails over the week-ends to ensure that as many people as possible could register or apply for whatever form of absent vote they wanted."

Electoral Services Manager, Southern
"......Then, those registering online seem to expect to be spoonfed with everything - constant emails backwards / forwards. e.g. I've registered, have you got my application, when will I go on, what happens next? ....it's easier to email. I think that this is how they are used to living their young lives. This service has to evolve to cope with this new demand.”

Electoral Services Officer, North East and Yorkshire

9.25 There was also a high volume of telephone calls during the election period.

"The above issues and the volume of phone calls they generated made polling day for this election one of the most stressful I can remember in over 20 years in the job.”

Electoral Services Officer, South West

"On polling day, we also had to deal with over 2000 telephone calls, which was impossible to manage without considerable additional support.”

Electoral Project Manager, London

"The 20 year event - combining all out locals with parliamentary - as well as parish elections on the same day, just multiplied the logistical operation to a challenging extent. Where I thought there would be efficiency savings these paled into comparison with the additional complexities, the demands from the electorate and the candidates. From 6.30am until 8.30pm on election day, the phone calls never stopped = no breaks, just answering calls and picking up the flashing voicemail messages. Five in the office plus the call centre could barely cope. Very, very difficult elections and I see it as a career highlight that I managed to deliver a safe result to the praise of agents, candidates and the RO, stay sane and get through it in one piece. But I never want to work 38 hours in one go again.”

Election Manager, North East and Yorkshire

Election Turnout

9.26 The turnout for the UKPGE was 66.1% compared with 65.1% in 2010. Turnout was particularly high in Scotland at 71.1% with two constituencies seeing turnout rise above 80%. The high turnout meant that polling stations were busier than recent elections as the following reports demonstrate.
“Whilst we predicted the 65% turnout quite well, the effect on polling stations was not predicted so well. Whilst we followed the EC guidelines on staffing stations based on electorate per station, we had to deploy extra staff during the day to cope with the numbers coming through the doors. Some polling staff are not used to being so busy!”

Elections Manager, North East and Yorkshire

“Having extra poll clerks at 99% of all polling stations helped us enormously. Turnout was 69%.”

Electoral Services Officer, West Midlands

“Turnout very high (73%) - caused issues with polling station staff who are not used to this level of interest (although we did tell them!!). Also caused delay in count as two lots of papers to verify in all but 3 boxes and three papers in around 20. General calls on the day were much higher than expected and higher than they had been in the run-up. Lots of queries relating to emergency proxies and lost/not received postal votes.”

Electoral Services Manager, South West

“The high turnout meant that polling stations were busier than anticipated with some struggling to cope…..”

Consultant, London

“We had a turnout of just over 74% which is the highest for a General Election for many years.”

Democratic Services Team Leader/DRO, Scotland and Northern Ireland
10 Voting materials and notices

“Over 46 million people are registered to vote in elections in the UK. Voters should be able to ‘make their mark’ easily and confidently, knowing that their vote will be counted in the way they intended. Ballot papers and other voter materials should not create barriers to that.”

“The guidance should also help to bring greater consistency to the design of materials used across the UK, so that voters have a similarly good experience wherever they are voting.”

“There is no easy solution to designing voter materials. The circumstances of each election vary, including the number of candidates or parties standing, the body or office being elected to, the number of seats being elected to, and whether or not the election is combined with another election. These variations affect the requirements of electoral stationery, which makes it impossible to take a ‘one size fits all’ approach.”

Making your mark – good practice for designing voter materials: guidance for government policy-makers

Prescription, adaptation and design

10.1 All voter-facing election documents are prescribed in the relevant election rules. This provides certainty and clarity as to the wording of the specified forms and notices, including the ballot paper and postal voting stationery.

10.2 In our report on the elections in 2010, we commented that most prescribed election stationery and notices are often not user-friendly or in plain language. In other words, the forms as set out in the legislation are not the finished article in terms of design or production.

10.3 This is recognised in legislation in that it provides for adaptations or forms ‘to like effect’ to be used. This approach allows for local information such as contact information and maps on poll cards to be included. It has also resulted in many different printing contractors and software companies producing different election ‘products’, These have been developed over a number of years with input from electoral administrators, learning the lessons from each iteration.

Making your mark – good practice for designing voter materials: guidance for government policy-makers

56 Making your mark – good practice for designing voter materials: guidance for government policy-makers
10.4 This has resulted in some variations in wording and presentation, including the use of pictorial instructions and a video as referred to earlier (neither recognised in the legislation) in an effort to make the prescribed forms more accessible for voters.

10.5 The other key factor in the production of voting materials is the relationship between the design and the fixed and variable data required, all of which has to be tested along with live proofs. This becomes even more crucial when polls are combined, as multiple versions of documents such as poll cards and postal ballot packs are required according to the different polls at which an individual voter is eligible to vote. In addition, the introduction of IER also resulted in multiple versions of documents such as poll cards. The complexity means there is a higher risk of error. The following quotes give a clear picture of the level of complexity involved in producing accurate stationery for combined polls.

"The impact of a combination was visible from the start and continued until the end."

Electoral Services Manager, South East

"Combination is becoming the norm but is getting more and more challenging. ........There are so many variations of poll cards (esp with IER transition arrangements) a lot of faith had to be put into printers to get it right. We proofed over 800 cards."

Electoral Services Manager, North West

"Complexity of IER resulted in 6 variants of poll card - Regular Station matched for IER so offering of postal vote; RED elector station - no offer of postal; empty properties; postal; postal proxy; proxy. Processing took longer and therefore may have in some cases caused delay in send. For some data houses this was difficult to extrapolate. Where cross boundary responsibilities, with different data houses, there was added complexity as supplier but much depended on IT processing capabilities of respective local authorities. Having Parish elections in many areas, resulted in separate data being provided because of the need to ensure postal packs were only ever returned to lowest denomination of polling station - which if all elections had been combined, would have resulted in not being able to pre-prepare packs until contested Parishes were known. This will have had an impact on LA’s costs - as separate data, processing, packs, and send out. Earlier agreement of use of logos would be appreciated - not accepting changes during nomination process - this should be agreed with parties nationally ahead of any election. With 3
elections (and in some cases 5) I would imagine print and fulfilment capacity was pushed to its limits. We do not outsource however those suppliers that do, may have had to use less experienced print providers, which given the complexity of the data involved with up to 5 elections, makes for complexity and increases the potential for error.”

Sales Director, Eastern

10.6 In our 2010 report, we recommended that, in order to improve accessibility to the electoral process, all voter materials should undergo appropriate usability analysis and that relevant representative groups should be consulted as part of development of such materials. There is clearly benefit in terms of economies of scale and consistency from this being done centrally. Our report in 2011 also supported such a review.

10.7 In making this recommendation, the AEA envisaged that such a review and testing of voter materials would represent a significant piece of work, both in time and resources, to deliver it effectively. In addition to the consultation indicated above, it would require input from representatives of the elections management software companies and the main printing companies involved in the production of voting materials and notices.

10.8 Our recommendation supported the view that the forms prescribed in legislation ought to be fit for purpose and intelligible for voters. They ought to set the standard for quality and accessibility.

Ballot papers

10.9 The format of the ballot papers for the UK Parliamentary General\textsuperscript{57}, local government\textsuperscript{58} and parish council\textsuperscript{59} elections in England and Wales changed for the elections on 7 May 2015 by removing the numbers against the candidates on the ballot paper. In all three cases, the legislation was late as outlined earlier in this report and did not follow the Gould six month’s principle. For example, the Parliamentary ballot paper regulations were only made on 9 March 2015. This obviously had implications on electoral administrators and printers with their election planning preparations.

"The change in the ballot paper formats appeared to be extremely late and caused many issues with our printers, ensuring they had the right template for us, and could use the

\textsuperscript{57} The Representation of the People (Ballot Paper) Regulations 2015
\textsuperscript{58} The Local Elections (Principal Areas) (England and Wales) (Amendment) Rules 2015
\textsuperscript{59} The Local Elections (Parish and Communities) (England and Wales) (Amendment) Rules 2015
information exported by the system. I don't fully understand the need for the change but the timing of the change, so close to the election, was not acceptable.”

Electoral Services Manager, Eastern

10.10 There were mixed views reported by electoral administrators in relation to the impact of the removal of ballot paper numbers, with some reporting no impact at polling stations, whilst others reporting issues for blind voters with the removal of numbers. It would appear that, whilst there was little impact in the polling station, there was significant impact at the counting of votes in multi-member wards, which will be covered in detail in a later chapter of this report.

"An absolute scandal that numbers were removed from the ballot papers. Several complaints from the visually impaired and those with learning difficulties. Pakflatt selectors were a complete waste of time.”

Electoral Registration & Returning Officer, Southern

"Removal of numbers on ballot paper made it difficult for presiding officers to explain who candidates were to voters with disabilities.”

Wales Branch

"The impact of no number on the ballot papers made it harder for blind people to vote. The person reading out the names has to count down.”

Senior Electoral Services Officer, South East

"The Pakflatt selectors seem a bit pointless now that there aren't any numbers on the ballot papers. The authority we gave away to hadn't given any thought to how complicated it would be if everyone chose their own ballot paper colours. They took on from three authorities and each one used different ballot paper colours for different elections, including them. Reports from our own councillors who attended the verification were that they found it very confusing to see so many colours and not be able to identify which were district, parish and so on. They thought it lacked transparency.”

Electoral Services Manager, South West
“No impact with removal of ballot paper numbers. Pakflatt selector is obsolete and needs updating or retiring.”

Principal Elections Officer, West Midlands

“The pakflatt selector is very expensive for what it is. We should be allowed to produce our own version.”

Electoral and Civic Services Manager, London

“No candidate numbers on ballot paper has the biggest impact on the count, not polling.”

Elections Manager, North East and Yorkshire

“Bring back numbers. Left justification also caused a couple of complaints.”

Head of Electoral Services, London

“The lack of candidate numbers on ballot papers was only a small issue for one area where there were candidates at a multi-vacancy poll with the same surname. Much care had to be exercised with guidance and polling booth notices due to various limits on votes available.”

Consultant, North East and Yorkshire

10.11 Sequentially, the problems with party emblems on ballot papers had resulted in the reproofing and reprinting of ballot papers, thereby causing pressure for both printers and electoral administrators. There then followed reports in relation to poor quality printing of ballot papers with various errors. This was probably as a result of an accumulation of late legislation, incorrect emblems and the complexity of combined polls coupled with issues relating to IER. This led to printers being over stretched, largely because of the lack of capacity within the industry and the consequential risk of errors.

“Capacity issues were raised again due to the late change of political logos which were not shared with electoral administrators at time of change. This required full proofing of ballot papers over the weekend following close of poll- this in turn delayed the print commencement. Our despatch date for parish ballot papers and the second postal vote issue were delayed slightly due to the knock on effect of printing days being lost. There was a period of time where we were asked not to contact the printers as they could not deal with the number of enquiries they were receiving regarding print
issues/receipt dates. Neighbouring authorities had some major issues which appeared to be because of pressures attached to the lost print time due to the logo changes.”

Elections Manager, North West

"Printing was a headache as soon as we started to print anything, with problems on all fronts - apart, perhaps, from poll cards. Some of these were significant, with reports of additional (unnumbered) ballot papers, postal votes being printed incorrectly - though we picked this up at the printers and got it changed - and late delivery of ballot papers.”

Head of Resources, East Midlands

"Supplier capacity issues is a concern. My normally reliable printer really struggled this time and did make some mistakes. Fortunately nothing serious for me which couldn't be fairly easily resolved and the mistakes didn't affect anything crucial to the conduct of the election.”

Electoral Services Manager, South West

"...The deadline for nominations and withdrawals being on the same day, coupled with the desire to release postal packs as soon as possible, meant that the timeframe for checking proofs with printers for postal vote ballot papers was condensed into a very short window, often out of normal office hours. This could have led to errors on the ballot papers if the proofing process was not carried out correctly.”

Elections Manager, North East and Yorkshire

Postal ballot packs

The number of combined polls in some areas meant that some printers were unwilling (on the basis of risk) to offer a fully combined UK Parliamentary, local authority and parish elections postal ballot pack.

"Postal vote print company informed us late in the process that they were not prepared to go with our requirements of a triple combined pack as they couldn't wait until the close of nominations for all the uncontested parishes. We went with our backup company who in the event seemed less experienced and has problems with their gumming machine at the eleventh hour. Instead of gumming the A envelope they attached self-adhesive strips which some electors struggled
with. IER used up valuable planning time during the autumn and winter. Time which was essential for planning a triple major election. A lot of staff were consequently required to work long hours and weekends.”

Electoral Services Manager, South East

“There should never be more than 2 Elections that are combined. Tremendous problems with PVs as the Printers cannot handle more than 2 and the Parish Elections had a separate issue which totally confused the poor Electors.”

Electoral Registration Officer & Returning Officer, Southern

10.13 Combined polls also add to the complexity of postal ballot packs in relation to their design, size, variable data and recording of the different ballot papers numbers for each election. This is exacerbated by the variations of eligibility to vote in the different elections caused by the different franchise of electors. As a result of the increased number of combined polls in recent years, the postal voting statement needs to be reviewed to ensure the instructions and wording prescribed is suitable for use in a combined poll with the introduction of a pictorial guide being allowed in legislation.

“All so complex now especially when the elections are combined. Gone are the days when you had one template - for these elections we had 8 different formats of poll card according to the type of voter and type of election they could vote in and which constituency they were voting for. It's the same with the postal voting statement - this time we needed 10 different templates! Obviously all needing to be merged with the correct data.”

Electoral Services Manager, Southern

“Print supplier problem with issues of postal packs wrong ballot papers issued to one ward causing major problems for team to correct and re issue. Contractual, production schedules and combined poll no issues.”

Admin & Electoral Services Manager, North West

“The capacity of the main printing companies has been a real issue this time with the complexity and number of combined polls. Their lack of understanding over cross boundaries. Security issues due to sub-contracting print work. Poor communication. Production and delivery schedules slipping.
Mix up with postal and ordinary poll cards from data extraction being incorrect.”

Electoral Services Manager, South East

“We have used the same printers for some time now and have always been really satisfied but this year the issues surrounding the ballot paper emblems for the Green Party & Lib Dems taxed even them. The delay they had in getting ballot papers reproofed, signed off and reprinted for other Councils was quite stressful as it had an impact on our postal vote issue. We were told 3 days before our scheduled issue that our late postal votes would be going out 4 days later than agreed. This meant we had to take staff out of the office and spend a whole day doing the postal vote issue our self. The printer had been good with setting a limit to work they took on which was just as well.”

Electoral Services Officer & DRO, South East

10.14 The introduction of IER also added to the complexity of the elections in May. A postal voter had to be IER registered to receive a postal vote. Following the main issue of postal ballot packs, any electors who had not been verified and were marked as “red” but then turned to “green”60 having been verified by DWP, or local data matching or by supplying documentary evidence, were then entitled to receive their postal ballot papers. This had significant implications for both the printers and electoral administrators, because of the volume of “red” electors who turned “green” after the main postal vote issue, coupled with the unknown volumes of new applications.

“...Issuing postal votes to electors going 'green' after -12 took up too much time...”

Senior Electoral Services Officer, South East

“...Some problems with non IER electors who didn't understand why they couldn't have postal votes. This was particularly true of overseas electors.”

Elections Officer, Southern

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60 “red” unconfirmed elector – unable to match with DWP or local data matching, “green” verified elector - matched by either DWP, local data matching or documentary evidence
“...It is silly to think that electors who were confirmed on election day could receive their postal vote. This bit of legislation needs looking at.”

Lead Officer for Elections, Wales

**Corresponding Number Lists**

10.15 The Corresponding Number List (CNL) is, without doubt, imperfectly prescribed in legislation. In combined polls, there is provision for only one CNL resulting in practical difficulties administering the process of issuing ballot papers where the franchises for the respective elections are different and voters entitled to both ballot papers may choose to take only one of them.

"Could we please end the use of CNLs. These seem to be unnecessary and a huge waste of paper. We had a massive problem caused by the printers of the give away authority who issued ballot papers for our stations that were different from what we had expected. We were not aware of this until the Tuesday at which time we had to start manually renumbering the CNLs. This was hugely time consuming, made more difficult by the fact the POs were collecting their boxes that day. In the end we had to change only the first two sheets of each polling station and ask the POs to change them as they went. Not good. If we had counterfoils we would only have had to change the ballot paper accounts."

Electoral Services Team Leader, Southern

**Poll cards**

10.16 A key factor in relation to the production of poll cards and postal vote packs this year was the introduction of IER. There were numerous versions of poll cards for various types of electors along with additional print runs of poll cards and postal ballot packs as electors became verified. As previously reported, the complexity of the combined polls, the numerous permutations of templates and the reprinting of ballot papers increased the risk of error.

"We ended up with 21 versions of poll cards - needs simplifying."

Democratic Services Officer (Electoral), East Midlands

"The constant requirement to keep on top of producing data runs for poll cards as 'electors' became verified and then past their determination dates, was stressful - it is difficult from
previous years when final determination was not made until after -6 and then with the May bank holiday it was difficult to get everything dispatched in time.”

Electoral Services Manager, Eastern

"The number of poll card letters (including polling station map) [we] sent out in the week before polling day (new names since the poll cards were delivered over the Easter weekend).

Tuesday 28 April 2015 – 7,404
Thursday 30 April 2015 – 8,443
Total 15,847

Issue here was the very large numbers being sent out meant that we contracted this out to the [local authority] corporate printing contractor for the first time (normally printed in house) and this process worked extremely well.”

Head of Electoral Services and Elections, London

"Problem with our printer who issued the wrong version of the poll card with the wrong date for emergency proxy applications. Printer accepted full responsibility and issued at their own cost apology letters to all voters providing the correct details. No problems with printing of postal vote packs and ballot papers.”

Democratic Services Team Leader/DRO, Scotland and Northern Ireland

10.17 Following the introduction of IER, it was recommended by the Electoral Commission that ERO’s should issue a ‘Household Notification Letter’ (HNL) in the early part of the year. The Cabinet Office provided maximising registration funding which could be used towards the costs of the HNL. Many EROs sent out a HNL and, following its success, the question has to be asked as to whether the poll card in its current format with its current despatch time in the election timetable should be reviewed to meet the needs of the elector. It may be more productive to send a HNL to every household in the early part of the year and then a further notification to be sent at the beginning of election week by way of reminder. EROs now also hold email addresses for all electors that register online. This data could also be used to email a reminder of registration and absent voting deadline dates, with a follow on
reminder immediately prior to polling day to encourage voter participation.

"….he had email addresses for 20% of his electorate, and this had helped."


The Electoral Commission website and guidance

The modified materials were made available to administrators on the Electoral Commission website. The guidance and resources provided by the Electoral Commission were welcomed by electoral administrators generally.

"EC resources were useful and their help was appreciated/timely/useful."

Electoral Services Manager, South West

"Good guidance, forms, and helpful telephone/email responses."

Head of Resources, East Midlands

"I found the guidance and resources provided by the EC excellent. Easy to read yet comprehensive. The POs and PCs also commented on the quality of the handbooks."

Elections Manager, Wales

"EC risk register, project planner and AEA 'calendar' are good starting points."

Southern Branch

However, there were also reports received in relation to timeliness, areas where guidance was not provided and the significant issues reported earlier in this report relating to the changes in two political party emblems and commonly used names.

"EC resources were late some of the time, incorrect in a number of places, very late changes and modifications/amendments to guidance. Very poor in my opinion compared to previous years. Bulletins do help but putting a bulletin out at 5:30pm after close of nominations at 4pm with late modifications was ridiculous. This must improve
for future years, found myself chasing for resources that should have been available weeks before they were.”

Elections Officer, Scotland and Northern Ireland

"Electoral Commission Parliamentary Guidance is really good and assists the whole process very well, but there were a few items that were not ready when they should have been. Three examples were in preparation for the political party agents/candidates meeting in January 2015 the EC power point presentation for political party agents/candidates had not been produced and with this in mind can I suggest that with early meetings being arranged that this guidance should be produced earlier. At the same time with all the nomination pack forms being produced Item 1.131 – Withdrawal of a candidate was not been produced at the same time. The third item was the booklet for Returning Officers and their deputies in adjudicating doubtful ballot papers at local government elections in England and Wales to be updated to not show ballot paper numbers – The Parliamentary had been updated."

Head of Electoral Services and Elections, London

"Lateness and alterations to EC guidance and nomination forms (parish) caused problems in the preparation.”

North East and Yorkshire Branch

"Notification from the EC that the emblems for the Greens and Lib Dems had changed was received too late and was too low key. They must have known before the deadline that these changes were happening but I didn't receive any notification other than in the normal Bulletin which I received AFTER I had proof read 135 ballot papers on the Saturday morning. Fortunately I had not signed them off as there were some minor errors, but this meant that I had to re-proof all 135 ballot papers again.

Return of candidate's deposits. The EC guidance says they must be returned to Her Majesty and the Cabinet Office will give instructions. I haven't seen any instructions on this and am still waiting for an answer from the EC. Surely it would have been sensible to include this information in the Bulletin sent out immediately ahead of the election.

Don't like the new system for contacting the EC. It takes so long to get an answer to anything and most queries would never receive a response ahead of any deadlines. I use the
EC less and less these days now that we have lost the local link."

Electoral Services Manager, South West

"EC RO guidance issued late in the process."

Elections Manager, North West

"Poor timeliness of resources being made available, reliability of information being provided and then having to be corrected and poor timing in response times to queries makes this score low this year."

Elections Officer, Scotland and Northern Ireland

"All good stuff. EC Bulletins were a bit 'after the event'?"

Electoral Registration Officer & Returning Officer, Southern

"Some guidance/directives from the Electoral Commission were received too late. Some guidance (e.g. that about commonly used forenames/surnames and middle names) was controversial and unhelpful. It prompted some candidates to complain about the "nonsensical" guidance regarding middle names etc. Whilst we welcome advice and guidance it should be clear and timely and this was not always the case. We were at the mercy of our printers who luckily told us about the late changes to some of the political party emblems when they sent back ballot paper proofs, for instance. We were not made aware of this by the Electoral Commission in time. I appreciate the Electoral Commission were also under extreme pressure at times though, one of our candidates told us about the delays they had encountered trying to register a new political party/description. The Electoral Commission guidance to Returning Officers for combined elections was, on the whole, very helpful."

Electoral Services Manager, East Midlands

"There was no cross boundary guidance when there should have been. This was produced later but was of no use!"

Electoral Services Manager, East Midlands

"EC guidance is good but not as complete as it used to be and the absence of the footnotes cross referencing to legislation that used to appear is a major loss as this was extremely useful. We did also find some inconsistencies in the text
between the various elections when actually the same process applied.”

Member Services Manager/DRO, South East

"It is sometimes difficult to locate the correct up to date legislation for the various documents. The EC used to provide template PVS's/Poll Cards etc which were useful when proof checking. Even a list of the most up to date legislation for each type of election would be useful”

Elections Officer, Southern

"I have noticed as someone who reads all of the guidance that over the last 3 years this is being written more generically to talk about wider considerations when planning and running elections / registration when it used to contain more specific advice about the legislation and what could be done / what the expectations were for certain scenarios. There needs to be somewhere that highlights all the key references such as the templates for ballot papers, for each election level and postal vote statements depending on combination or not all in one place as searching in the legislation for this is time consuming. An FAQ's page for specific questions asked to the EC for example would be massively beneficial as if one person asks many others are likely to be thinking the same or experiencing the same issue.”

Elections and Land Charges Team Leader, Eastern

"Updated guidance from EC - after printing off RO guidance etc. changes are then made having to reprint documents again as I highlight text and add my own notes - EC to issue replacement pages”

Electoral Services Manager, South West

Reports were received in relation to the Electoral Commission’s nomination forms and the lack of candidate and election agent contact details being requested. Additionally, there was an issue about the need for further clarification in relation to ‘description’.

"EC candidate forms should be changed to ask for the phone number and email address of candidates, which would speed up communication with them and reduce postage costs and delays.”

Deputy Acting Returning Officer, South East

"Usual issues with nomination papers not being completed correctly/in full and candidates/agents not being happy that they had to go away and come back. Perhaps revised forms
set out clearer may assist, perhaps with 'bubble notes' like on ITRs or a one page sheet taking them through completing the form. It is not a difficult form but things are always left blank.”

_Elections Officer, Southern_

"Qualifications criteria needs to be clearer for candidates to understand - guidance from EC needs to be clearer and timely.”

_Southern Branch_

"The nomination paper caused a problem - we used the EC design but every paper was wrong at informal checks! The 'Description' field is not understood and candidates do not read the guidance. We had all kinds of descriptions provided but few related to the registered party name or registered description. The early published guidance for RO's document from the EC was very good and easy to read, thank you. The bad and doubtful guidance/placemats are well used but they came out a little later than we had hoped.”

_Election Manager, North East and Yorkshire_

10.21 In March 2015, the AEA responded to the Law Commission – *Electoral Law: A Joint Consultation Paper* supporting the following provisional proposal:

- A single nomination paper, emanating from the candidate, and containing all the requisite details including their name and address, subscribers if required, party affiliation and authorisations should replace the current mixture of forms and authorisations which are required to nominate a candidate for election.\(^{61}\)

**Recommendations:**

- The UK Government should:
  - review the prescribed voting materials and notices for elections;
  - re-consider the design of ballot papers to include numbers against the candidate;  
  - re-consider the rationale for Corresponding Number Lists and seek more viable solutions, with input from electoral administrators;  

- review the purpose, format and timing of the poll card along with other forms of communicating key dates to electors;
- allow sufficient time and opportunity for electoral administrators and printers to input their experience into the development of new voting materials and notices;
- bring forward changes to the legislation to allow for these improved forms to be available for use at all elections.

The Electoral Commission should:

- review its procedures to ensure timely bulletins and resources are made available in the future;
- review its nomination pack to include contact details.
11 Managing the Polls

11.1 Earlier in this report, we reviewed the impact combined polls, cross boundaries, emergency proxies and IER had on the elections held on 7 May 2015. This chapter looks at other factors in relation to managing the polls.

Polling district reviews/polling stations

11.2 The Electoral Registration and Administration Act 2013 introduced a change to the timing of compulsory reviews of UK Parliamentary polling districts and polling places. The last compulsory review had to be completed between 1 October 2013 and 31 January 2015 (inclusive). Subsequent compulsory reviews must be started and completed within the period of 16 months that starts on 1 October of every fifth year after 1 October 2013. Because of the implications of other work pressures, such as the introduction of IER and other elections in some cases, there was, for some authorities, insufficient time to carry out a full review. Some local authorities also carry out a rolling review following each election.

"The polling district review had to necessarily be a light touch, due to the many other things being undertaken at the same time. We struggle to find suitable venues in some areas and have had to become creative with our choice of venue."

Election Manager, North East

"Polling District review to be completed in advance of the UKPGE with shortened deadline, when we had two major polls in 2014 plus by-elections was unwarranted and placed unnecessary pressure on limited resources. Accessibility is generally good in our district but limited resources in a rural area have to be recognised."

Elections Officer, Scotland and Northern Ireland

"After the polling district Review in 2014 we had 5 new stations, by the time we got to the election we had gone up to 8. This is mainly due to redevelopment of areas around the borough, halls no longer being available because they have permanent hiring contracts with nurseries / groups. It is becoming very hard to find suitable halls / premises within a London Borough. Being inner city we cannot use porta cabins as there is not the space to put them in the majority of polling
districts. Also the cost of station hire has gone up considerably - our average is £1,000 for the day.”

Electoral Services Manager, London

“No issues this year. Some polling stations due to closures will not be available for 2016 elections but these matters will be picked up as part of our annual polling place review conducted after each election.”

Principal Registration & Members Services Officer, North East and Yorkshire

11.3 In addition, some areas had a local government boundary review with the final recommendations being received too late for implementation in the register published by 1 December 2014. This resulting in those EROs having to republish their register in the first quarter of 2015.

"The LGBCE must be told not to issue any final recommendations on Boundaries in the period of 12 months before an Election unless the law is changed to allow EROs to create and approve the Polling District Boundaries. The final recommendations for [us] were published in September 2014 and this was insufficient time to create the new arrangements before Register publication date so it had to be re published in February.”

Electoral Registration & Returning Officer, Southern

"Use of schools is becoming more and more difficult to facilitate and guidance regarding what needs to be undertaken to enforce use of these types of buildings is lacking. Timings of boundary commission reviews where likely subsequent CGR and PDR will be required should be given better consideration as we had some substantial changes but were left with very little time to communicate these.”

Elections and Land Charges Team Leader, Eastern

11.4 The boundary review also had other implications with some electors going to the wrong polling station.

"The boundary review resulted in hundreds of electors going to the wrong polling station (despite mini canvass, poll cards and social media campaigns). This resulted in lots of phone calls from PO's to check addresses. Access to [our EMS
software] for POs would relieve this pressure and allow PO's to check why some electors were removed from the register.”

Electoral Services Officer, West Midlands

“This was generally fine, but we will review properly in a couple of months. It was made much more difficult because the recent ward boundary changes were not coterminous with county boundaries (as expected), but to the extent that we ended up with one tiny polling district because of the way the boundaries had been drawn.”

Head of Resources, East Midlands

11.5 Local authorities are responsible for the review of polling districts and places. Reports were received in relation to the conduct of polling district reviews and the influence political members have on the outcome of the polling scheme approved by local authorities.

“Few issues with polling stations although there were some issues with the use of schools. However, they are often the only suitable building in an area. The polling district review had only resulted in a few changes to polling places but some of these had been decided by elected members against professional advice. Decisions about polling places should be for the Returning Officer.”

Consultant, London

“Polling station locations are fine. However I do have a conflicting view on the polling district review to that of my authority. The process has become ‘political’ with a small p in respect of the number of polling locations has reduced from 88 in 2010 to 77 in 2015. At the same time the electorate has increased by some 7000 (4%) which places pressure on some of the existing locations which have to house more teams and also a number of disgruntled electors. Early indications also show that whilst the overall turnout in the three constituencies was almost identical to 2010, those areas where there had been polling location closures did suffer a reduced turnout. This is not in the spirit of what a polling district review should be about.”

Electoral Services Manager, London

“Accessibility is a really big issue in rural areas as there simply isn't the availability of venues to choose from. It is difficult to strike a balance between providing a station that is within (or local to) the village and providing a station that is
100% accessible. Many of the village halls etc. have very poor access. It would be useful to have some more robust criteria that the RO could rely on when having to defend their choice of polling station with elected members.”

Corporate Manager-Elections & Electoral Management, Eastern

11.6 In our report in 2011, we recommended that the selection of ‘polling places’ should be the responsibility of independent ROs rather than of local authorities.

11.7 In March 2015 the AEA responded as follows to the Law Commission – Electoral Law: A Joint Consultation Paper provisional proposal 3-5: The designation and review of polling districts is an administrative matter which should be the responsibility of the RO rather than local authority councils:

“The AEA supports this provisional proposal. All too often the local politics of an area can influence the designation of a polling district area or polling place. The RO (presumably UK Parliamentary) would be better placed to represent the geographical and community needs and would have an unbiased and apolitical opinion when allocating polling districts and places. The usual consultation process should be conducted with local political parties being included as part of the consultation process and also invited to comment on the RO’s final proposals. The current arrangement for appeals being considered by the Electoral Commission should be retained.”

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11.8 In previous reports, we have highlighted the difficulty in identifying suitable buildings for use as polling stations. It is becoming more difficult each year as school authorities try to resist being used as a polling station and because of local halls and other public buildings closing as a result of the lack of funding and local government cut backs.

"The availability of suitable polling station venues has reduced over the last 5-10 years as community venues are closed and schools become academies outside of LA control.”

Electoral Services Manager, Southern

"The identification of suitable buildings that are suitable for use as polling stations continues to be an issue. Schools are being more challenging when we wish to use them. Finding

buildings that are convenient to electors in terms of distance to travel etc. versus and being fully accessible to the disabled is a real problem.”

Electoral Services Manager, North West

“It's getting harder to find polling stations as the Council is selling off more and more buildings. The costs of the private ones we do have risen massively.”

Acting Elections Services Manager, London

"Some schools are becoming more resistant to their use. Because of the number and frequency of elections in recent years necessitating the use of all stations across the borough each year (2010 UKPE, 2011 Av referendum, 2012 PCC, 2013 County Council, 2014 European, 2015 UKPE and in 2016 PCC etc.) an element of election fatigue is setting in. This is against a background of our usually having elections by thirds whereby many polling stations haven't in the past been used every year.”

Electoral Services Manager, North West

"It is getting harder to book polling stations with schools resisting and complaining. Whilst we quote the legislation, this takes up valuable time and is stressful. We are also finding that council halls are closing due to cutbacks and we are losing long term polling station venues. It gets harder to source new venues and this year we had to increase the number of temporary stations, much to the disdain of polling staff, elected members and electors alike. The days of venues doing their civic duty are long gone - there are too many conflicting performance standards -especially for schools and academies. Polling district reviews bring the problems to a head. Electors don't understand why we can use such and such a building, the elected members want a polling station on every street corner, and venues won't co-operate. It is labour intensive and fraught................but like all of our work, has to be done.”

Electoral Services Manager, West Midlands

"Being a rural area, with many remote polling districts, a lot of the venues used are not ideal but are the best we have and seem to work well in these circumstances.”

Democratic Services Manager/Deputy DRO, North East and Yorkshire
“In general the polling stations were accessible and their staff were very helpful. We had a couple of schools who were not happy about being used as stations but most places were welcoming.”

Electoral Services Officer, West Midlands

11.9 The adverse impact a polling district review can have on polling stations was also reported:

“Turnout was lower than expected, queues were experienced in certain stations which may have been as a result of the Polling station review, further guidance to Presiding staff resolved these and no issues were experienced at close of poll.”

Electoral Services, Manager, West Midlands

“Problems caused due to high volume of electors at polling stations. This included queues outside the polling stations, polling station staff not getting proper breaks, more polling booths had to be delivered to cope with demand. Problems also caused by running multiple elections at the same time, resulting in delays in completing the necessary paperwork (as there were several sets to complete after the close of poll) and consequently delays in delivering the ballot boxes and paperwork to the count venue.”

Democratic Services Officer, Eastern

Recommendations:

- The Local Government Boundary Commission should allow sufficient time (i.e. not less than twelve months) to conduct a full polling district and polling place review and the necessary consultations before any final Local Government Boundary Commission recommendations take effect at any election.
- The selection of ‘polling places’ should be the responsibility of independent ROs, rather than of local authorities.

Staffing

11.10 Many administrators reported issues again this year relating to the recruitment of sufficient numbers of staff to work at polling stations. This has become an increasing problem over the last few years and which is likely to become worse as a result of falling numbers of local authority employees following budget cuts. Other reasons quoted for the difficulty in recruiting staff this year included the level of pay and the new HMRC changes to real time tax reporting.
Some local authorities conducted recruitment drives early in the process to try to recruit new staff.

"After last year we realised that it was the same core of people doing the work, not just the electoral services team but other key people. To this end we did a big recruitment drive across the authority staff and their family/friends. This resulted in lots of people wanting to be Poll Clerks / count assistants, not a lot of response from management levels. Due to staff turnover within the council / retirements etc we had to appoint 19 new presiding officers and had to 'persuade' people to be Count Supervisors! There was also the usual late drop outs in all areas some were unavoidable instances but some were people just decided not to do the job......The result being - same stalwarts doing multiple jobs.”

Electoral Services Manager, London

"Staffing elections is generally getting much harder as the size of the Council workforce is reducing, fewer people willingly want to participate and the rates of pay are not good. We also have to compete with neighbouring London Boroughs who are able to pay more than us. Should there be a directive that Council staff cannot work on the poll without taking a day's leave or count staff getting time off in lieu as well as payment for an overnight count we will simply not be able to staff elections adequately.”

Member Services Manager/DRO, South East

"Staffing the polling stations was one of the two big issues we faced this year..... We experienced an unprecedented number of people who were no longer willing to work as Presiding Officers or Poll Clerks and were unable to recruit what I would deem as sufficiently capable replacements. I had to make do in the end, with the additional risks that this brings. The two common themes were that the process has become overly bureaucratic and complicated, and that the rate of pay is not commensurate to the responsibilities that come with the role. I don’t necessarily concur with the first point, but I can understand why it puts off some of the older retired generation. However I believe the pay needs looking at. We paid £240 to a Presiding Officer and £144 to a Poll Clerk, which works out at £14.12 and £9.00 per hour.”

Policy & Governance Manager, West Midlands
“It is getting hard to find staff for some jobs, we had to find 19 new presiding officers, we promoted from existing poll clerks but it took some persuading, moving people around so that you had some experience at each station, not just new people. The situation is not going to improve as local authority resources are cut, also there are complaints regarding the money offered for working 15 hours in a polling station - this again is unlikely to increase as each year the MRA is reduced not increased.”

Electoral Services Manager, London

“Staff within the local authority have been reduced due to local government cuts. This impacts greatly on the availability of experienced staff for polling and experienced staff for the count.”

Electoral Services Manager, Eastern

“Ok, struggled at times for Presiding Officers esp. but generally filled from volunteer, no advertising required. Issue with dwindling council resources that council staff are being prevented from taking part due to service impact and also the increasing interest of the CO in targeting these staff in particular as they are employed by the council and this is seen as a potential for a cost saving in pay for the future. We simply won’t get the staff if they go down this route.”

Elections Officer, Scotland and Northern Ireland

“No issues at all. All staff at the council have had to take a day’s leave to help out on polling day so we are less reliant than others on the diminishing pool of council staff. We never have resourcing issues on the basis of bordering home counties so are able to take people from across the borders as we tend to pay higher for the day.”

Electoral Services Manager, London

“It’s a real struggle to get enough staff.”

Elections and Information Manager, Southern

“We managed to staff polling stations (just). This continues to be a concern each year. We cannot just use internal staff and appoint a significant number of external people to help both in polling stations and at the count.”

Electoral Services Manager, North West
11.11 It was reported that the polling station staffing number ratio recommended by the Electoral Commission was adopted as a minimum, with some appointing additional polling station staff as a result of it being a Parliamentary UK General Election and in some cases a combined poll.

"EC ratios - we went above and beyond the EC ratios (all stations had at least one PO and two PC’s.) Without this we would have struggled to deal with voters on the day. Many first time voters, two or three ballot papers to be handed out in each station.
We had difficulty in recruiting PO’s - the whole election was so high profile that many didn’t want to take on the responsibility.
Bank holiday weekend - impacted on handing out ballot boxes and on training. All had to be done over the bank holiday weekend - many staff away on holiday so two large ‘mop up’ sessions held on the Tuesday before the election. Too close to the election really."

Electoral Services Officer, North East and Yorkshire

"Staffing was sufficient, experienced PO’s were in short supply, but PC’s were promoted. Staffing was to EC ratios as a minimum. Training seemed to work but certain staff seem to struggle with the amount of info being given to them."

Electoral Services Manager, West Midlands

"Recruitment of polling station staff is an issue as previously noted. We used the EC ratios as the basis for allocating polling station staff and there were no issues on polling day related to this. In some cases (e.g. combined stations) we had allocated additional staff over and above the EC ratio to manage any queues and ensure that tellers were monitored."

Electoral Services Manager, Southern

"Staffed in accordance with EC ratios with additional reactive poll clerks (1 per ward). No significant issues."

Elections Manager, North West

11.12 Administrators also reported about staff dropping out at the last moment and the need to recruit and train replacement staff at a time when they are already under pressure with other critical work
relating to the election and registration. Some ROs had recruited reserve polling station staff. However, the costs incurred in appointing reserve staff is not covered under fees and charges and, as a result, the local authority has to meet any costs incurred, such as training or reserve fees paid to staff acting in that capacity and being on standby for polling day.

"Staff pulling out at the last minute as usual. Cross boundary issues OK in general. I think we should be allowed to claim for reserve polling staff. We used our reserve PO who was appointed at 10pm on Wed 6 May."

Senior Electoral Services Officer, South East

".....We had a significant number of staff drop out this year, particularly with less than a week to go, and particularly in the more senior roles. Luckily, our training is very good (the staff appointed in the cross-boundary stations that our 'take on' Borough appointed were all extremely complimentary about it) - and includes some significant hands-on training in relation to ballot box construction, ballot paper account completion and dealing with angry or difficult customers. As all staff - from Poll Clerk up to Polling Station Inspector, and including all stand-by staff - have to attend in order to have their appointment confirmed, this meant that we were able to fill gaps by using stand-bys or promoting other staff upwards, as everyone had been trained in all roles.

Learning going forward - we will increase the number of stand-by staff appointed and trained in future, so that finding replacements is less stressful.

It should also be noted that this role is an enormous undertaking, carried out by one person (me!) - and is, effectively, a full time job for a significant number of weeks at a time. We went out to advert in November this time around - but will need to consider going out even earlier in future, in order to try to spread the workload over a longer period of time going forward."

Electoral Project Manager, London

"Only issue was higher than usual number of call-offs from polling station staff so kept having to find more standby staff. There was no particular pattern to the call-offs just the usual reasons of ill-health, hospital appointments bereavements, broken limbs etc. However, everyone turned up on the day
and survived until 10pm so no last minute replacements required.”

Democratic Services Team leader/DRO, Scotland and Northern Ireland

“Lost a lot of staff in the week prior to the election - difficult to find additional staff and issues compounded by other work necessary.”

Elections Manager, North West

“Staffing did cause a problem over the last few days but sufficient reserves had been trained. Polling station Inspectors trained specifically on cross boundary matters and postal votes handed into the wrong polling stations.”

Electoral Services Manager, Wales

“Finding it harder to recruit staff people not interested we also had a lot of staff dropping out in the last few days”.

Admin & Electoral Services Manager, North West

11.13 In addition, the complexity of combined polls and cross boundaries in some areas added to the issues in administering the poll.

“Stations in cross boundary parts of the constituency weren't as well run. We had not trained the staff, their authorities had. It is too far for staff to travel to come here and we can't spare the core team to go there. Our training is always as late as possible so it is fresh in the minds of staff and includes any current issues. Staff numbers were adequate, but we didn't have many spares left.”

Democratic Services Manager/DRO, North East and Yorkshire

“Real issues with POs. So many of them messed up their ballot papers accounts despite extensive training. EC ratios OK.”

Electoral Registration Officer & Returning Officer, Southern

“Many polling resources were stretched to their limits and some quality issues arose. Contingency planning was difficult keep on top of.”

Consultant, North East and Yorkshire

“Polling station staff ok on the whole. Many found the business a shock as not used to it!! Combined election added
complexity which some struggled with. On the whole everything dealt with well. “

Electoral Services Manager, South West

Recommendation:

The Fees and Charges Order should cover the costs incurred in appointing reserve polling station and count staff and should take into account the costs of appointing additional polling station staff as required, even if it is above the EC ratio.

Queues

11.14 At the Parliamentary UK General Election in 2010, queues at polling stations at the close of poll were recorded. Since then, legislation has been introduced which allows a voter who is in a queue at 10 pm to be issued with a ballot paper. There were reports received that polling stations were busy and there were small queues in some areas during the day. However, administrators had proper procedures in place for 10 pm should there be a queue.

“We staffed to EC ratios in the stations. We had to send our contingency team to one station which was struggling with queues mid-afternoon.”

Elections Manager, North East and Yorkshire

“We staffed up to the EC recommended levels for these polls, and we needed to deal with the busy times of day. We learnt some lessons about the capability of some of our Presiding Officers and may have to review the sort of station we appoint them to in the future. Some will not make the cut anymore. We had contingencies in place for dealing with queues at 10 pm but we did not need to put them into operation. The pressure that a few polling station staff were under at times during the day manifested itself in some cases by them appearing to forget all they were told during training and briefing sessions.”

Electoral Services Manager, East Midlands

“All stations were busy the whole day. No issues with queues at night - there had been small ones at a lot of stations during the day. We had more rejected parliamentary papers - voting for more than one candidate - and I think this is because the
multi member ward papers issued at the same time allowed them to vote for more than one."

Elections Manager, North East and Yorkshire

"A massive turnout on the parliamentary increased the turnout of the district and parish by nearly twice as much. This created small queues during the day in polling stations. This also made the count process a lot longer with a vast increase in blank (doubtful) papers."

Electoral Services Manager, South East

Electoral Services office

11.15 The core electoral services team has always been busy at previous elections on polling day. However, the elections held on 7 May appear to have produced one of the busiest polling days on record in relation to issues. These issues related to dealing with emergency proxies, IER, UKPGE, local elections, franchise queries, polling station locations and others.

"Very busy day. PO's still phoning the office at 9.50pm with elector queries. I usually leave at 9pm to go to the count, had to stay until 10pm so got to the count venue late. Voters confused by parish election mentioned on poll card when most were uncontested. Lots of emergency proxy communications but all OK by using mobile phones."

Senior Elections Officer, South East

".....We were totally swamped as a direct result of the impact of IER on this election, and had to bring in an enormous resource of other people to assist in the run up to, and particularly during, polling week - including weekend working for the month prior to the election. This has an obvious implication in terms of space and equipment, both of which are at a premium in any authority - plus necessitates an enormous amount of time in training and bringing people up to speed. Without additional resources, we would not have been able to cope. Processing all of the completed applications within / immediately following deadlines was an incredibly onerous and never-ending task, and had a significant impact on the ability of the team to deal with anything else - including the significant number of normal enquiries. On polling day, we also had to deal with over 2000
telephone calls, which was impossible to manage without considerable additional support.”

Electoral Project Manager, London

“…..Election day in the office was manic with all 6 phones ringing almost constantly all day long. It cannot be underestimated the stress that Electoral Administrators have been under.”

Electoral Services Manager, Southern

“The IER impact caused us some new problems on polling day that kept our team very busy on the phones for most of the day. For example, we had a number of calls from polling stations where people had been sent a poll card, but were subsequently deleted from the register based on information received following our household notification letter. It was difficult in these cases to tell someone that they couldn’t vote, even though they had a poll card! We also had some people who said they had registered online and had an e-mail confirmation of this, but for some reason they were not registered to vote on polling day.

Emergency proxies were much more of a challenge this time due to the extension of the regulations to cover employment reasons. We had a lot more of these applications than last year and it took several members of the team to keep this under control. The 5pm deadline on polling day for emergency proxies seems stupid. In my opinion, the deadline should be 5pm on the day before polling day (or earlier).

For polling stations with a local by-election on the same day, it was difficult for some European (G marker) electors to understand that they could vote in the local election but not in the UK Parliamentary election.

Some voters did not understand why the names of David Cameron or Ed Miliband were not on the ballot paper. This caused some postal voters to phone us to ask where their Parliamentary ballot paper was. Our polling staff also had to explain the situation to some voters. This was a much bigger issue than 5 years ago, probably due to the high profile television debates this time.

Perhaps the confusion was created by national party leaders saying "vote for me or vote for the other guy." In 5 years’
time, would it be clearer if the message was "vote for my party"?"

Electoral Services Officer, South West

"Communication with stations is not easy in our area. Not many phone boxes and mobile reception not good. Issues dealt with on the day included some clerical errors and emergency proxies - issues of communication dealt with through use of inspectors but delays caused for electors as we couldn't get the information to the polling station quickly enough. Combined elections - electors only wanted Parliamentary - many blank papers at parish level turnout level meant some staff very busy with less time for breaks etc, may impact on overall service to electors. Close of poll paperwork took longer due to higher turnout. Higher levels of turnout meant much higher than expected calls to the office - needed to draft in extra staff."

Electoral Services Manager, South West

"There is so much which may now need to be conveyed to polling staff on polling day that this poses significant problems in large rural areas like ours, where mobile phone signal isn't always good."

Electoral Services Manager, South West

"It became impossible to deliver emergency proxy appointment letters to the high volume of appointees so we had to phone polling station staff with them on election day. Only increased the amount of work to be done. Election office staff did not have time for even a five minute break on election day and worked 22.5 hours straight. Had complaints from electors wanting to vote for the political party leaders - as usual - highlighted the level of understanding of some members of the public."

Elections Manager, North West
12 Verification and Count

12.1 In 2009 the AEA set out the aims, principles and practice that should underpin election counts in an issues paper.63

“The primary aims for the conduct of any election have to be its integrity and the assurance for everyone concerned that the result is reliable and accurate. To achieve the second aim, it is essential that the count is conducted in as an efficient a manner as possible. It follows that the primary concern of ROs should be the efficient and effective conduct of the count to ensure an accurate result and that candidates and agents can be satisfied that the proper and required processes have been followed to deliver that result.....

The count should not be a race but a serious and accurate process.”

Counting Arrangements for the General Election – An AEA Issues Paper, October 2009

Counting of Parliamentary UK General Election votes

12.2 At a Parliamentary UK General Election, legislation specifies that the RO must take reasonable steps to begin counting the votes as soon as practicable and within four hours of the close of poll. This duty relates to the actual counting of the votes and not to the verification process. Whilst this may be achievable at a single election, there are issues in some constituencies primarily relating to the return of postal votes from polling stations, large rural areas, any delays as a result of queues at polling stations and cross boundary issues.

"With just the one election we counted overnight. There were no issues, with the verification and count done within our estimated timescales.”

Electoral Services Manager, London

"Verification took a long time as we are so rural. Everything runs much more smoothly when we can have a daytime count. There is only one venue large enough for 2 Constituency counts.”

Senior Electoral Services Officer, South East

63 The paper was prepared on the basis of the situation applying in Great Britain given that many of the issues raised in the paper are not applicable to the Northern Ireland situation.
64 Counting Arrangements for the General Election – An AEA Issues Paper
“Due to the high volume of postal votes handed in at polling stations the verification took longer as the verification staff were waiting for the PVS to be verified and where necessary matched before they could be included.”

Temporary Postal Vote Administrator, Eastern

“Overnight count still a risk and a cost – eg helicopters.”

Scotland and Northern Ireland Branch

“We are a small Borough (in size), with a comparatively large number of constituencies (3) - two of which are cross-boundary. This has a significant impact on our ability to declare results as early as some of our neighbours. We have no difficulty in appointing Count Assistants - or, indeed, senior count staff - although we will want to look at the structure going forward, to ensure that the ratio of Count Assistants to Count Supervisors is improved. Our [counting] is only just about adequate in terms of size, and we do not have any obvious venues (i.e.: large sports halls etc) in the Borough - but our post-election action plan includes a thorough review of all available options in the Borough, to see if we can identify a suitable alternative, and to consider the logistics of moving (ICT etc). We have 2 years in which to achieve this in theory, as the GLA election will be counted at Alexandra Palace. The 2.00am deadline for starting the count is a double-edged sword. It focuses attention and activity on ensuring that verification gets off to a good and timely start - but it adds pressure and concern where there does not necessarily need to be this from about 1.00am onwards, as Returning Officers / DROs start to worry that this deadline will not be met. We only had a single poll this year, so cannot comment on timings in relation to a Parliamentary plus other(s). However - it has got to be impractical to try to count one straight after another. Even in Sunderland!”

Electoral Project Manager, London

“No issues for UKPGE count - large geographical area so last box does not arrive until 11.30pm - declared at 3.30am. Scottish local government by-election electronic count held next day but verification of stubs, unused and spoilt undertaken on Thursday night.”

Depute Returning Officer, Scotland and Northern Ireland
12.3 At combined polls however, starting the count of Parliamentary ballot papers within four hours can be extremely difficult taking into account the above factors plus others and the need to sort ballot papers and deal with any ballot papers for other elections if different ballot boxes were used at the polling station for each election.

"The overnight verification and count made it difficult to recruit enough staff for our 6 constituencies (although [one], was counted the following day). We had a lot more inexperienced people in key posts this time. The rule requiring us to begin counting within 4 hours of polling stations closing doesn't work well in large rural areas like [ours]. After close of poll, many Presiding Officers have to drive for about 30 minutes along dark rural roads to deliver their ballot box and then have to wait for their boxes to be checked in, which can take them up to 11pm. In my constituency, I had two ballot box receiving hubs and there was a further delay as one PO was late arriving at each hub. The boxes then had a further van journey of about 30 minutes to the East [x] count centre. As a result, one van arrived at about 12:15am and the other van (with most of the boxes for the constituency) arrived around 1:00am. Therefore, we were unable to begin counting until 3:20am and declared at 7:15am (only 45 minutes later than originally estimated). I eventually got home to bed after 11am on Friday having worked a 27 hour shift!"

Electoral Services Officer, South West

"Most of the core team had to go over 36 hours without sleep. The combination and volume meant that although everything went according to plan it just took time. Having to count within 4 hours of poll is not realistic with this combination of polls and the volumes that needed to be verified across all the election types first."

Electoral Services Manager, Eastern

"Was difficult to start by 2am, but we did - just. We had only 2 hour break in 48 hours. Shame on you wanting an overnight count - people were tired and I am sure there would be a more accurate count if candidates could wait just 24 hours after polling day for an accurate result."

Electoral Assistant, Eastern

"Verification at combined poll took a long time. Having to start Parliamentary at 2am meant that this process was
slowed down as we had to split the teams into count & verification. We didn’t declare until 12:45pm. Costs will be shared between the elections as verification but overall much higher than expected. Some staff at the count centre for 30 hours (count for locals at 2pm on Friday) which is not good. Would be better to allow next day counting as staff awake and used to working in the day - as time goes on staff become more tired and work more slowly...”

Electoral Services Manager, South West

“All counts took much longer than planned. Staff and accommodation was well planned. Coordinating 3 counts with cross boundary issues caused some headaches, but all issues were dealt with.”

Elections Manager, North East and Yorkshire

“Combined polls and a high percentage turnout resulted in a long verification and count evening.”

Electoral Services Manager, South West

**Impact on the core electoral services team**

12.4 The AEA has highlighted previously a number of health and safety issues, as well as the risk of error relating to tiredness, in relation to the requirement to count overnight. Good practice in complying with the Working Time Regulations would suggest that a risk assessment should be carried out on the issue of the amount of time that staff should be expected to work without proper breaks. In most cases, it is the core electoral services team who will have been working long hours on the run up to an election. They will also have started work before the opening of poll, dealing with enquiries for the whole of polling day, before having to work at the election count overnight. With combined polls, they will then be expected to work on the principal area and parish counts, probably on the following day.

"The parliamentary count concluded at 7am on Friday 8 May and the local started at 11am. This gave no time for key staff to have any sleep). The local count then continued throughout the day with no food or break and ended at 7pm. The RO and her management team had no sleep and were exhausted. This resulted in a third recount request (with only 3 votes difference) being delayed until the Monday morning. This had to be arranged over the weekend though. It was a dangerous situation for staff and physically stressful and exhausting. Its assumed that there will be a shift system or standby staff -
but when you have a small team, there are some staff who can’t be replaced half way through.”

Election Manager, North East and Yorkshire

“As usual the long hours has an impact on all election staff. Finished parliamentary count and got home at 5.30am. Managed to get an hour sleep on the couch, then back to work for nine to start local count at 11am.”

Electoral Services Manager, North West

“We did our local count after the Parliamentary count, however, in [our area] we had 4 re-counts which delayed us significantly. Other than that would have been o.k.”

Electoral Services Manager, East Midlands

“We counted the general election overnight, finishing at around 6am. We were then back to count the districts and parishes from 10.30am on Friday, finishing at around 6.30pm. Fresh counters for each but the same key staff. However, I’m not sure that authorities who counted over an extended period were any less tired than we were and it did drag the process out, whereas we went home on Friday evening and had a good break from it all over the weekend.”

Electoral Services Manager, South West

“This was hard graft. I did 40 hours from awaking at 5am on 7th May through to finishing the local/parish counts at 9:30pm on 8th May. The only rest I got in that period was 6am - 8am on 8th May. By 3pm on 8th May I was unable to do the simplest of maths at the count and had to have someone double checking my every move for fear of causing a right old mess. As it happens I thrive on that adrenaline rush you get from it all, but then I’m only 34. I called in every resource I could to delegate roles across as wide a range of people as possible, but this still leaves those 20 or so key people at the counts who are doing similar hours on top of their day jobs, and losing 40% of what I can afford to pay them in tax. Essentially, the current system relies on good will.”

Policy & Governance Manager, West Midlands
12.5 There is a need to review the requirement for the counting of UKPGE votes within four hours of the close of poll. With the introduction of IER and the complexity of elections as outlined in this report, the core electoral services team cannot continue to be expected to count overnight after the long hours they have already been working in the run up to polling day. It is imperative that the count is conducted as efficiently as possible and that the result is reliable and accurate. The health and safety of the core electoral services team and the RO also needs to be considered.

"Combinations with local elections including verification of local cross boundary boxes etc. led to a longer verification prior to parliamentary count - which meant a later finish Friday morning before the local count later on Friday. The 2am start on the Parliamentary count was unhelpful at a time when accuracy and structure was needed (instead of forced actions).”

Electoral Services Manager, East Midlands

"It is my opinion that the overnight counting of ballot papers is unnecessary, unreasonable and could lead to inaccuracies because staff are tired.”

Elections Manager, North West

"....Too much pressure to start the count by 2.00am given the combination. We would rather have a robust process and accurate result with a start time slightly later that 2.00am than a rushed process for the sake of a few extra minutes.”

Democrat Services Manager, East Midlands

"We should not be dictated to by the media/EC on when we conduct our counts. The many combinations had severe impacts on resourcing, venues, quality of staff and hours worked by key electoral staff.”

Electoral Services Manager, South East

"Again had problems getting staff for the Count's. We do not like to use staff in the evening that had been out all day in polling stations. Some insisted they would be OK and regretted it as we did not declare until 6.30am. Having the Parliamentary count directly after close of polling really need to be changed to a mandatory start the following morning. Our local count we foolishly arranged for 10am start on the Friday so many staff worked 36hrs without sleep - not good.”

Electoral Services Officer & DRO, South East

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"Very difficult - I needed to recruit 250 staff for the overnight count and 250 staff for the District / Parish count on the Friday. Recruitment was not easy. On election day itself I had 7 count staff cancellations. I managed to phone 10 'reserve' staff - in the end I was 3 counters short on the night. Empty chairs don't look good to the ARO. We had three parliamentary results to declare - they were done at 5.30am, 6.00am and 6.15am. Hardly an overnight count. The district count started at 2pm, meaning that the core team was back at the centre for midday (having left at 7am). Friday count - finally finished the last parish count (using counting sheets) at 9.15pm. Crazy hours - from 6.30am on Thursday through to 9.15pm on Friday for the core team (with some short breaks, but still!). We ran a mock count for a new team of senior count staff (accountancy team). This went well and really helped - for the new staff and for the core team. Got our heads into count mode the week before the count. For most elections we count on a Friday - we only count overnight once every 5 years. I think we need to review this - the parliamentary election would have been easier if we counted overnight all the time - we'd have the required team in place. If the legislation doesn't change then we are considering moving to an overnight count for all elections.”

Electoral Services Officer, North East and Yorkshire

"Once again it was difficult to get staff to work on the count due to the reduced pool of local authority staff to draw from in the first instance. [We] counted the parliamentary, immediately followed by the local ward polls. This does impact on a core team of staff when there are reduced resources. My core team worked from 6am on polling day and whilst you try to schedule substantial breaks it is not always possible. Without resources, who are able to manage and answer election queries, the core team need to be on hand.”

Electoral Services Manager, Eastern

"Counted overnight (shouldn't be made to do this) and on Saturday for the locals. We needed some sleep on the Friday. Some local politicians would rather we hadn't needed to sleep, obviously…”

Democratic Services Manager, North West

"Real issue recruiting staff for the Count/s. The verification took so long due to the combination and when one count was
finished another started. The time is now right for a review of overnight counts.”

Electoral Registration Officer & Returning Officer, Southern

“We did a next day count which went very well.”

Elections Officer, North East and Yorkshire

“Given the experience of events such as the Scottish Referendum etc were a Friday daytime count engages the public and allows social media to be fully deployed the requirement for overnight counting should be revisited. How many electors follow events at 3 am compared to how many would follow events at 11 am on a Friday morning?”

Electoral Services Manager, North West

“I think it is not good health and safety for the count to continue on after verification. Staff were working over 24 hours then coming back for a number of other counts on the Friday this will need to be looked into for future.”

Senior Elections Officer, South West

Recommendation:

The UK Government should review the need to start the count of Parliamentary votes within four hours of the close of poll, in the interests of ensuring an efficient count with a reliable and accurate result, together with the health and safety of electoral staff.

Count staff

12.6 Reports were received from administrators regarding the difficulty in recruiting sufficient count staff to work on an overnight count and, in some cases, polling station staff had to be used at the count following the close of poll as a result of not having enough count staff. There were further difficulties for those with combined polls.

“We struggled to get enough counters willing to work through the night.”

Acting Returning Officer, East Midlands

“….Hard to recruit staff to work over night. Prefer day counts.”

Admin & Electoral Services Manager, North West
“The availability of staff proved a difficult problem, both in respect of finding enough people, especially for the overnight count, and then in having enough fresh count staff who had not been on duty all day. In the event the majority of people involved overnight had been sitting in a polling station all day. There were no reserve overnight staff. Senior managers and supervisors were expected to work all day, then, after a short break, all night until 6.30am and then again the next day for the local election count from 11.30 until 9pm. This was an uncomfortable and draining experience.”

Democratic and Electoral Services Manager, Eastern

“Severe difficulties getting staff to do an overnight count, been some 5 years since last done.”

Electoral Services Manager, West Midlands

“We just managed to get enough staff for the Thursday night count. We prefer to do everything the next day and people don’t want to work into the night. Key staff had a very long 48 hours - not our choice of doing things.”

Senior Electoral Services Officer, Eastern

“Hard to get staff – pay rates, smaller ‘core’ of council staff. Parliamentary lasted overnight and local counts started 2 hours after Parliamentary declaration. No sleep for core staff.”

Elections Consultant, Eastern

“One big count through the night, local elections on the end, finishing Friday lunchtime. Took longer than anticipated because of verification….. Only just had enough staff to deal with the scale of the count and no possibility of a change of team. All proper processes followed and accurate results delivered.”

Democratic Services Manager/DRO, North East and Yorkshire

“Staff were excellent! Council supported the process by releasing staff for the Friday count. We declared at 3:21am for the Parliamentary on Friday, 8 May and around 12 Noon for the Local elections…”

Principal Registration & Members Services Officer, North East and Yorkshire
“Election staff had to continue with registration work, meaning a second team needed to be recruited in order to prepare for the elections. Polling station staff had to be recruited for the count so there were tired people working the count.”

**Electoral Services Manager, South East**

**Count Venues**

12.7 In some cases, ROs were restricted on the size of count venue available within a constituency. This restricts the number of count staff appointed and therefore impacts on the time taken to count the votes and declare the result. It also has an effect on the number of counting agents that can be permitted.

"The current count venue is centrally located, has been used for decades and is popular with candidates and agents. However, it is limited in capacity and this has meant that declaration times have slipped with combined elections. A larger venue is required but there is no obvious candidate. This could mean using dual counting venues for each constituency but this would mean additional cost which may not be met by ECU. The requirement to write a statement if the count is not started by 2am should be repealed. I could understand it if we were deferring the count to the next day but this is not the case. It should not be for the LA to subsidise the Parliamentary count in order to meet this requirement.”

**Electoral Services Manager, Southern**

"We had a lot of TV and Media which was managed very strictly by our communications team. We did limit the number of counting agents, observers etc. because of the size of the hall, but everyone was happy with their allotted numbers and on the night it wasn't too crowded.”

**Electoral Services Manager, London**

12.8 Several reports were received from administrators relating to a change in count venue so that there was a larger space available to deal with the counts from the combined polls and thereby increase the number of count staff. In addition, count centre bookings had to be extended. However, all of these issues tend to have an impact on costs.
"We moved to a sports centre for the first time. We were able to double the amount of counters we used which knocked over an hour and forty minutes off our previous declaration time. We were clearing away by ten to three for the Parliamentary. We then did our local count at 12 midday on the Friday and completed it within two hours."

Electoral Services Officer, West Midlands

"Overnight – parliamentary, Saturday – Borough, Sunday – Parish. New venue used; large impact on local government costs but well run and organized."

Electoral Services Officer, East Midlands

"Verification for all polls and the count by candidate for the General overnight. The local government counts by candidate Friday afternoon. New and much larger count venue used. Additional security and transport needed. Verification very crowded with all political stakeholders invited although not many LG representatives decided not to attend and others were acting in more than one capacity. Many candidates were acting as their own agents."

Consultant, North East and Yorkshire

"[We] had a high level of media at the count. The choice of the count venue was paramount in this instance and the venue was chosen in part due to the communication facilities that it provided. Additionally a dedicated team of staff led by the media department, managed the media and co-ordinated their technical requirements, leaving the core election team to manage the election."

Electoral Services Manager, Eastern

"I had to book the Leisure Centre until 12 noon on Monday because of the possibility the count would be adjourned to Saturday morning and the need to arrange for contract services staff to remove the furniture and equipment after the weekend. Inevitably this impacted on the cost of administering the count."

Democratic and Electoral Services Manager, Eastern

"We verified all polls and completed the count for the parliamentary election overnight. Verification was completed at 1.15am. We had 144 verifiers/counters (Yes it’s a big, big arena). The count finished at 3am. We counted the Borough
Council on Saturday 9th May (11am start to 6pm finish) and the Town/Parish Councils on Monday 11th May (2pm start and 5.30pm finish). We consulted with Agents, lead members and Parish/Town Councils and all were happy with this scheduling.”

Electoral Services Manager, East Midlands

The counting of votes

12.9 A number of administrators commented that they had successfully switched to a ‘mini-count’ system this year. This is a model for counting that breaks the count down into smaller, more manageable parts. A change in legislation this year which allowed for the counting of parliamentary votes to begin before all other ballot papers had been verified also complemented the mini-count system.

"First time mini-count system used and well received by candidates & agents. A mini-count rehearsal was given to senior staff & supervisors followed by a demonstration to candidates & agents. Counters would have preferred numbers on ballot papers.”

Electoral Services Manager, Wales

"Mini count worked extremely well, particularly as we had to do a re-count because the result was close. The re-count was within two votes of the original which was very satisfying and allowed it to be done quickly.”

Electoral Administrator, Scotland and Northern Ireland

"Used mini count and worked well - counters counting in tens also an improvement in accuracy and speed of count.”

Head of Electoral & Member Services, London

"We used mini counts at ward level which worked well and provide the reassurance that if there is a problem we will be able to isolate it and address it.”

Electoral Services Manager, North West

12.10 There were mixed views received on the legislative change allowing the counting of parliamentary votes to begin before all other ballot papers had been verified, although the majority welcomed the change.
"To start count before all verified was very helpful."

Electoral Services Manager, South East

"Mini Counts worked well. Good job legislation was introduced to allow counting before the verification was completed."

Electoral Registration Officer & Returning Officer, Southern

"Mini counts were used which proved very effective. Counting began before other polls were verified which also assisted with a speedier count."

Electoral Services Manager, Eastern

"We had no plans to start counting before the verification finished. However, during the verification the ARO saw that other AROs were tweeting about starting their count at 2am (or very soon after). We were then pushed to do the same. We'd half prepared for it, expecting it to happen, but at that point we were still waiting for the final postal votes for the parishes, so it took some managing to make sure that all votes were accounted for. We managed this as we were using mini counts for the parliamentary - a tick sheet helped us to keep on track and we only allowed experienced count staff to have verification and counting going on at their table at any one time."

Electoral Services Officer, North East and Yorkshire

12.11 Further legislative changes for this year’s elections included the removal of numbers against candidates’ details on the ballot paper. Whilst the reason for this change was intended to make it easier for the voter, several administrators reported issues relating to the counting of votes, especially at local elections, with candidates with the same surname. It was also reported that some ROs changed their counting method to grass skirts rather than tally sheets.

"Mini Counts. No ballot paper numbers mean that counters had to read names out for the counting sheets - took longer. Don't like counting before verification is over - it's a stupid idea."

Democratic Services Manager, North West

"We used mini counts - although possibly too mini - we will need to look at increasing the size of them going forward, but will almost certainly stick with the model. We did not have a combined poll, so cannot comment on counting before
verification of others completed - but I have to say that the experience of last year's local elections, with the massively increased number of split votes, was horrendous enough without having to factor in the absence of ballot paper numbers - I feel for those LAs who had locals this year, particularly on top of a Parliamentary.”

Electoral Project Manager, London

"No numbers on ballot papers makes use of counting sheets more difficult (especially where two candidates have the same surname).”

North East and Yorkshire Branch

"Started counting early parliamentary boxes whilst later ones and locals being verified. Used a "trough" system to assemble counted papers, but would change to mini-count in future as this would spread the focus of agents and candidates from one central point and allow any reconciliation checks to be carried out more easily. Grass skirts used instead of tally sheets for the first time - quicker and more accurate, good feedback from candidates - will use again.”

Democratic Services Manager/DRO, North East and Yorkshire

"Mini counts is the only way to demonstrate integrity. Counting before verification completed on other polls was a god send and a welcome change in legislation. No ballot numbers caused a problem with the local count where counting sheets were used. The full names of candidates had to be called out and this significantly delayed the process.”

Election Manager, North East and Yorkshire

"Mini-counts - was very accurate. No issue with count with the ballot papers not having numbers.” [UKPGE only]

Electoral Registration Manager, Wales

Appointment of counting agent

12.12 The deadline to appoint counting agents for both the UKPGE and the local elections to attend the election counts was five days before polling day, i.e. 29 April. Several reports were received from administrators advising that this deadline is too late and needs to be sooner to allow sufficient time for the count admission tickets to be prepared and despatched in the post so as to arrive before
polling day. In some areas with a high security risk, the count admission ticket has to be presented before entering the count. With the combined polls there was also the volume and complexity of some counting agents being appointed to attend only one of the election counts and if they had not been appointed as a counting agent for all counts.

"The deadline for appointing counting agents is far too close to the election. By the time we had all the count tickets ready to post it was just 2 days before the election. Many counting agents were worried they would not get their tickets.”

Senior Electoral Services Officer, South East

"We need to make it easier about issuing tickets as complex and time consuming.“

Electoral Services Manager, West Midlands

"Difficulties trying to use a count ticket system and sub-contracting the despatch of count tickets.”

Electoral Services Manager, West Midlands

"Many authorities were using new software which generally performed quite well in comparison to previous company’s software. However, it was a massive learning curve for staff at such a large scale election. In our authority we issued over 2000 tickets to candidates, agents, supporters etc. for different electoral events. This was a massive undertaking using new software - three people worked full-time over four days just to get tickets of admission out.”

Deputy Acting Returning Officer, North East and Yorkshire

"As usual election agents repeatedly fail to get themselves organised by the deadline for appointment, attempting to make last minute changes to suit themselves and cause delays to the pass production and door lists at crucial times when we should be concentrating on voters. In-fighting amongst themselves about numbers of agents and grandstanding is not helpful.”

Elections Officer, Scotland and Northern Ireland
“Good attendances at all events. Local Government attendees were removed from the Hall for the Parliamentary count by candidate but were allowed back in for the declaration of result. Advanced planning on number of agents impossible until the close of nominations and final total of candidates standing.”

Electoral Consultant, North East and Yorkshire

“Local agents etc. not happy about not being entitled to stay on at the parliamentary count. Had some issues there but in the end the Returning officer let them all stay. Had purchased different coloured lanyards for this very reason and ended up not being put into practice....”

Electoral Services Manager, North West

“Issued lots of passes but a smaller % than expected actually turned up.”

Democratic Services Manager, North West

Recommendation:
The UK Government should review the deadline for the appointment of counting agents.

Media and communications

12.13 Local authority corporate media and communication teams play a significant role in the elections, including the election counts. A UKPGE attracts both national and local media presence at most count centres. The communication of count proceedings, updates, information leaflets and supervision of the media is essential to ensure a smooth and efficient count. Various reports were received from administrators on the way they handled the media and communications at their count.

"Regular announcements provided. TV screens with messages of stages of the verification and count. Media behaved well and dedicated media officer on hand to deal with queries. Candidate / Liaison Officer to go between candidates/agents and core team with an information point for them. Leaflets explaining count process available. Posters around count venue with count process flowcharts.”

Electoral Registration Manager, Wales
“We did a booklet of all the instructions and entrance badges. Communication was easier as we were all on one level.”

Electoral Services Officer, West Midlands

“Massive media impact as having high profile candidate meant vast media enquiries. Handed this to my comms. team rather than try to do it myself. Attendance for others was strictly controlled within the three constituencies which with the exception of one party who wouldn’t comply with requests for names - was no issue at all.”

Electoral Services Manager, London

“Count was well attended. We produce a count booklet which contains all the information that observers and press need.”

Democratic Services Team Leader/DRO, Scotland and Northern Ireland

“….Huge volume of media compared with previous elections.”

Election Office Manager, Scotland and Northern Ireland

“All candidates and agents clear what was happening in count hall - use of count information officers to support communications - also media officers to work with TV etc.”

Depute Returning Officer, Scotland and Northern Ireland

“Live tweeting from the count by the media was a potential risk but thankfully they were kind. Others weren't so lucky and photos of angry candidates accompanied by sarcastic tweets were broadcast to the world. Local candidates wanted to attend verification so there was an issue with capacity in the hall. National media attended and there were no issues.”

Election Manager, North East and Yorkshire

“Sky uploading entire count to Youtube without prior discussion or even letting us know. Coverage included our preparation for the count.”

Scotland and Northern Ireland Branch

“It is very difficult to make sure that no one uses a mobile device during the process. We gave clear instructions, we got the media to sign up to our conditions and the provisions of
secrecy, but the local paper reporter still managed to take a picture of the votes building up and tweeted that the Conservatives were on course to hold the seat long before we were anywhere near declaring our general election result.”

_Electoral Services Manager, South West_

“...Strong media presence at Parliamentary count but less so at Local count. Attendance of media well accommodated and co-ordinated by in-house PR team.”

_Principal Registration & Members Services Officer, North East and Yorkshire_
13 The Writ and post-election returns

13.1 Election processes do not end with the declaration of results. There is a considerable amount of post-election work including the return of the Writ, return of deposits, payment of lost deposits, payment of staff including the payment of tax to HMRC, retention and storage of election documentation; receiving expenses returns from candidates and posting the relevant notices; and returning information and data to the Electoral Commission.

**Receipt and return of the Writ**

13.2 Current arrangements for the receipt and return of the Writ to the Clerk of the Crown are paper-based and involve personal delivery.

13.3 Election officers have to personally receive the Writ at the start of the election and then fill out by hand the relevant sections of the Writ and arrange to personally hand it to Royal Mail after the election.

13.4 In March 2015 the AEA responded to the Law Commission – *Electoral Law: A Joint Consultation Paper* supporting the following provisional proposal that the Writ should be capable of communication by electronic means\(^{65}\).

13.5 Overall, the receipt and return of the Writ went well.

"No issues with Writ - collected by Royal Mail at agreed time on Friday, 8 May...."

*Principal Registration & Members Services Officer, North East and Yorkshire*

"No issues - worked well. Royal mail made appointments to deliver and collect the Writs."

*Electoral Services Manager, North West*

"Having been up since 4.30am the day before did not appreciate having to wait around in the office until 12.20pm for Royal mail to collect the Writ - especially having asked for an early collection. Now just trying to pay people, pay stations, printers etc...”

*Electoral Services Manager, London*

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"Returning the Writ the next day caused a problem, one person had to come in specially to hand over because no-one at the count was due in the office...."

Senior Electoral Services Officer, South East

13.6 Given the use of technology in delivering public and legal services today there must be a more modern way of managing this process. Reforming the arrangements for delivery and return of the Writ has the potential to produce a more cost-effective, efficient and secure process.

"The Writ is an old and outdated process that needs to be modernised using electronic functionality."

Electoral Services Manager, South East

"What is the point of the writ?? Save £thousands and do it all by e-mail! EC expenses guidance is good."

Electoral Registration & Returning Officer, Southern

"The arcane arrangement with us having to wait for the dissolution of Parliament and the issuing/receipt of the writs when everyone else believed everything was in place for the delivery of the elections was unnecessarily cumbersome. If we stay with fixed term Parliaments there needs to be a re-examination of the issue of the writs. They are an encumbrance and, in the modern era, something that we should not have to worry about receiving."

Head of Democratic and Registration Services, Eastern

Recommendation:

The UK Government should introduce a system for the electronic delivery, receipt and return of the Writ.

Return of deposits

13.7 At a UK Parliamentary election, the £500 deposit made by or on behalf of a candidate must be returned if the candidate polls more than 5% of the valid votes cast. The deposit must be returned to the person who made it by no later than the next working day after the result of the election is declared. Considering the hours worked on the run up to the elections and during polling, followed by the overnight count, it is unrealistic to expect the deposit to be returned the next working day after the result of the election is declared. At
the polls in May, Returning Officers with combined polls were still counting their local ballot papers the following day with some counting over the weekend.

".....We should be given longer to return the deposits to candidates following an overnight count.....”

Senior Electoral Services Officer, South East

"....The refund of deposits within the recommended timescale is impossible so soon after the election, particularly following an overnight count.”

Electoral Services Officer, South West

"As soon as the declaration has been announced you have too much paperwork to do and send off. Arranging forfeited deposits or returning deposits, information to ECU does it all need to be done in 24 hours!”

Constituency Lead, South West

13.8 If a candidate fails to poll 5% of the total number of valid votes cast their deposit is forfeited. The Electoral Commission guidance stated:

“Forfeited deposits - If a candidate does not poll more than 5% of the total number of valid votes cast, their deposit will be forfeited. You must send any forfeited deposits to Her Majesty. The Cabinet Office will provide further information on this process.”

13.9 Reports were received from administrators regarding the lack of information in relation to where the forfeited deposits should be returned to.

"Lost deposits - nothing anywhere telling us where to send them. The EC guidance states they should be sent to Her Majesty, but no actual details. Surely this should have been included in their pre or post-election Bulletin.”

Electoral Services Manager, South West

“No advice that I can see as to where to send deposits that aren't returned to candidates not achieving 5%....”

Electoral Services Manager, South East

"No issue with the writ. Late advice from the Scotland Office.

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66 EC Guidance Part F After the declaration of the Result
on the return of forfeited deposits which had to be chased for....”

Elections Officer, Scotland and Northern Ireland

"......Return of candidate’s deposits. The EC guidance says they must be returned to Her Majesty and the Cabinet Office will give instructions. I haven’t seen any instructions on this and am still waiting for an answer from the EC. Surely it would have been sensible to include this information in the Bulletin sent out immediately ahead of the election...”

Electoral Services Manager, South West

"......No guidance was forthcoming in advance about the return of the forfeited deposits have had to chase for this as well.”

Elections Officer, Scotland and Northern Ireland

Recommendation:

The Cabinet Office should supply the details regarding the return of forfeited deposits to the Electoral Commission by no later than two months before polling day. The Electoral Commission should include these details in the Returning Officer guidance or, alternatively, the details should be included in a pre-election Electoral Commission bulletin.

Return of election data

13.10 The return of results, rejected ballot details, forms K, and additional data as requested by Electoral Commission had to be returned by no later than Friday, 22 May. There were also numerous other data requests. Whilst the importance of robust and timely data for electoral reporting is recognised, reports were received from administrators relating to the complexity of returns and the timescales for returns given the other tasks required during the immediate post-election period.

"...at combined elections could do with another week to prepare form K for postals.”

Electoral Services Manager, South West

".. I really don’t see the point of EC form K’s additional information any more.”

Head of Electoral Services, London
“......Would be helpful to have a longer timeframe for Form K statement of postal ballot papers, given one per ward to do. Also multiple feedback forms for different issues and organisations is time consuming.”

Democratic Services Manager/DRO, North East and Yorkshire

“The Form K for postal votes should be made less ambiguous. i.e. No. 15 should equal No. 6. 6 = number of covering envelopes received whilst No. 15 are the covering envelopes set aside for verification. BUT some of the No. 6 received do not include a PVS so could not be verified!

The Form K and additional information requirements could be released a lot earlier when you are preparing documents for 2 Constituencies, 1 Referendum and 30 District and 30 Town/Parish elections.”

Temporary Postal Vote Administrator, Eastern

“Cross boundary issues were planned quite effectively in the end. In each case the ERO authority issued the postal votes and dealt with the receipt of them. This meant no transfer of postal vote data or worry that [x] and [x] systems may not be compatible. The take-in authority issued the ballot boxes to the PO’s along with their own local boxes. Our printer delivered all the parliamentary ballot papers to the other authorities, they were brilliant. At the close of poll we had a van in each of the take-in areas to collect all the ballot boxes etc. to be taken to the count. One of the PO’s took the last few postal votes back to the ERO for checking. The postal votes were then transferred to the count centre by a van which waited for the verified local ballot papers to take back. This worked well. There were a few items that missed being put on the van taking the verified papers e.g. a few black sacks of equipment and some local election envelopes. These have been returned. Collating all the data for the Form K is a nightmare when not everything is supplied correctly from the take-in area. Still waiting for one set of data.”

Senior Electoral Registration Officer, South East

Recommendation:

The Electoral Commission should review the date of data returns following an election and look to simplify form K.
Tax payments for staff

13.11 Following the elections, the Returning Officer makes payments to staff who worked on the elections, along with payments for the hire of premises used as polling stations and count venue(s), together with payments to other suppliers in respect of services provided. Following the changes under HMRC Real Time Information (RTI), the Returning Officer must now send PAYE information and payments to HMRC each time a payment is made to staff who worked on the elections, rather than after the end of the tax year as was previously the case in some areas. Electoral Administrators reported that these changes have resulted in difficulties in recruiting staff to work on the elections as a result of tax implications. Previously, staff who did not earn enough in a tax year to have tax deducted from their earnings would complete a P527 and receive their payment gross. In view of the problems reported about the recruitment and retention of polling station and counting staff, the AEA will undertake a separate review of these issues with a view to identifying possible solutions.

"Other LA staff are involved in areas such as the postal vote issue and receipting processes and a good level of experience and expertise has been developed outside of the core election team. An area which is becoming increasingly more difficult is the recruitment of polling station and counting staff. Reasons include:
1. the local authority has fewer staff available
2. the local authority now requires staff to take annual leave for polling station duty
3. New HMRC RTI rules means that tax needs to be deducted and then reclaimed where a person is below the threshold whereas previously a P527 tax exempt certificate would have been completed."

Electoral Services Manager, Southern

"I have had several calls in the last few days from election staff who are retired and have had letters from the tax office to say that because they worked for us their entire tax allowance for the year has been transferred to the returning officer and subsequently their pension will be taxed at 40%. Approximately a third of the people I employ are retired and they will not want to work for me again if this is going to happen. It’s bad enough that they have previously taxed their election pay and made them wait until the following April to get it back but this is completely unacceptable. I have staff who earned less than £100 who will lose several times that
amount monthly because of the 40% tax deduction to their pension. I am going to continue to press this matter with the tax office but nationally something needs doing or we will lose a vast number of available and experienced staff....”

Elections Manager, North West

Candidates’ expenses returns

13.12 Candidates at UK Parliamentary General elections are required to submit an election expenses return and declaration, including all invoices or receipts for items over £20, to the Returning Officer within 35 calendar days of the election result.

13.13 The Electoral Commission produces the forms and detailed guidance for the submission of expenses. However, some candidates find the completion of the forms confusing, along with the formula used to calculate election expense limits.

"....Post election procedures ongoing including induction of new members. Expense forms starting to be returned - as usual, inexperienced candidates do not know what to include or how to complete and Parish Councillors do not see the need when an election is uncontested. Again, the norm and a challenge.”

Principal Registration & Members Services Officer, North East and Yorkshire

"EC to do more about telling candidates that they must return expenses as part of standing as a candidate.”

Southern Branch

".....there are still differences that should be resolved between Parliamentary and Local Elections e.g. the register to use for nominations/expenses which confuses candidates and election agents - and us until we get our heads around it!”

Electoral Services Manager, North West

13.14 Returning Officers are required to publicise (in two newspapers) within ten days of the 35 day deadline mentioned above the availability of these returns for inspection and provide copies of all of these documents to the Electoral Commission. (In practice, not all are requested by the Electoral Commission). The returns are then held and made available for local inspection. In this way, the Returning Officer and his or her staff are acting as intermediaries in the regulation of election finance.
13.15 In March 2015 the AEA responded to the Law Commission – Electoral Law: A Joint Consultation Paper supporting the provisional proposal “that Returning officers should receive a single set of documents containing the return of expenses and declarations by the agent and the candidate. These should include any statement by an authorised person containing the particulars currently required to be sent to the returning officer by section 75(2) of the 1983 Act.”

13.16 In addition the AEA responded supporting the provisional proposal that “Returning officers should publicise and make available for inspection expenses returns (as well as publicising non-receipt of a return). Secondary legislation should prescribe in detail the process for that publicity and inspection, paving the way for publication online. In addition the AEA would like to see an online facility for the submission of expense returns in the near future. Consideration will need to be given as to how online publication will be effected and by whom.”

**Recommendation:**

The UK Government and the Electoral Commission should consider developing an online facility for submission of candidates’ election expenses returns, with provision for both candidate and agent to signify secure approval of the final return. Such a system should also provide a means for inspecting the returns, declarations and associated papers.
14 Conclusions

14.1 The 7 May 2015 will best be remembered for the political outcomes from the polls that took place on that day and the intense media interest. However, from an electoral administrator’s perspective they will be remembered for the fact that, yet again, complex elections following the most significant changes to electoral registration in over 100 years were successfully delivered. The real question for the AEA and its members is, “but at what cost?”

“.....Administrators are in some respects our own worst enemies because we continue to deliver. However, the ramifications of not delivering are so significant that we don’t really have a choice. I was seriously, genuinely concerned for my own health this year, and that of my colleagues (and being [under 30] I don’t think I should be saying things like that - I am nowhere near the hill never mind over it...!)”

Electoral Services Officer, North East and Yorkshire

14.2 The 18 months prior to polling day has been the most challenging period in electoral history for electoral administrators. This led to a feeling of exhaustion before they even started preparing for the elections on 7 May 2015. The table below shows the key events over that period with each bringing its own challenges as outlined in this report:

<table>
<thead>
<tr>
<th>Date</th>
<th>Task</th>
</tr>
</thead>
<tbody>
<tr>
<td>July – Sept 2013</td>
<td>IER confirmation dry run</td>
</tr>
<tr>
<td>16 Feb 2014</td>
<td>Deferred publication of the Register of Electors (England). (9 Mar – Scotland and Wales)</td>
</tr>
<tr>
<td>22 May 2014</td>
<td>European Parliamentary and local elections</td>
</tr>
<tr>
<td>10 June 2014</td>
<td>IER live (England and Wales) and confirmation live run</td>
</tr>
<tr>
<td>18 Sept 2014</td>
<td>Scottish Referendum</td>
</tr>
<tr>
<td>19 Sept 2014</td>
<td>IER live (Scotland) and confirmation live run</td>
</tr>
<tr>
<td>1 Dec 2014</td>
<td>Publication of the revised Register of Electors (England and Wales). (2 Feb 2015 - Scotland)</td>
</tr>
<tr>
<td>Jan/Feb 2015</td>
<td>Household confirmation letter</td>
</tr>
<tr>
<td>5 Feb 2015</td>
<td>National Voter Registration Day</td>
</tr>
<tr>
<td>7 May 2015</td>
<td>UKPGE and local elections</td>
</tr>
</tbody>
</table>

14.3 Despite the complexity of IER and its impact on absent voting arrangements, late legislation and the significant logistical arrangements required, including the mobilisation of large numbers of temporary staff, venues and equipment, and the immensely
challenging timescales in which to deliver these arrangements, ROs and electoral administrators are expected to deliver a perfect election every time. That is the presumption of the rules, and that is, quite rightly, the expectation of voters. However, under the current arrangements, this is becoming impossible to achieve.

"This has been the hardest and most stressful election in terms of staffing and resources in the core team. It has been a career 'high'. There has been no 'break' especially as there was a February write out to manage and process. The IER 'day job' continued throughout. Staff were reporting feeling exhausted and burnt out even before we started the official timetable. It was just 'head down' and get through it. The reason for this was all of these tasks (and more) needed to be undertaken concurrently and during the time when you needed headspace to calmly and accurately plan for and deliver these challenging combined elections:

- the sheer volume of calls from the electorate
- the number of duplicates and the 'service voters' being classified as 'other' electors
- the high number of proxy (and then emergency proxy) applications
- the high number of postal applications
- the large number of reviews and data matching checks
- stuffing of envelopes for ITR's and Reminders produced in house
- dealing with queries and complaints from previously rejected postal voters regarding the 'naughty' letter
- last minute applications to register to vote
- the February write out
- late applications to register to vote/have a postal vote (peoples expectations are that by ticking the IERDS 'postal vote' box, they are immediately postal voters)
- etc. etc.”

Election Manager, North East and Yorkshire

"I feel that all aspects of the elections process is close to breaking point. There are 2-300 risks to an RO/ERO at any election, the staff are working longer and longer hours, the timescales are becoming tighter and tighter, the volumes are getting larger and larger and printers are close to breaking point. The elections were delivered, but only due to the commitment of electoral staff. What will it take for something to go drastically wrong before anything is done about it?"

Electoral Services Manager, South East
This report provides an account of the experience of electoral administrators in delivering IER and the polls on 7 May 2015 and offers recommendations for improvements to the framework for electoral administration in the UK.

Whilst IER has been delivered successfully along with the introduction of online registration, this report has highlighted some of the issues during the run up to the elections, including the volume of duplicate registrations and implications for absent voting. IER appears to have been a success and, for that reason, the end of IER transition should be December 2015 to provide certainty for the important elections in 2016 and the European Referendum whenever that is held. However, despite the introduction of IER with online registration, electoral registration is still operating with old processes, a HEF canvass and additional bureaucracy. As a result, a full review of IER is required to allow IER to become more efficient, less bureaucratic and easier to understand from the individual’s perspective.

"On the face of it, IER is a success, and there were no major issues at the election. However, IER was only a success because of the extraordinary efforts of electoral administrators and local authorities. Although publicising IER as successful, the Cabinet Office, Ministers and the Electoral Commission must not overlook the personal sacrifices made by the ‘faceless bureaucrats’ who delivered that success – and although once again, and against all odds, administrators delivered, the continued likelihood of that occurring again is diminishing, not through a lack of support and professionalism but simply because the supporting mechanisms around Electoral Services Teams is disappearing. Local authorities simply cannot release key personnel from their day jobs to assist!

I have been involved in elections for nigh on 30 years, and I can honestly say that, even though it was basically a simple election [UKPGE only] I have never worked harder, worked longer hours, seen my family less and been more stressed than I was on this occasion. It may be I’m getting older but that is not the only factor – tinkering with tried and trusted systems is making the administration of the entire electoral process harder – and there will be a point where it becomes unworkable. I am not alone in these sentiments.

The online system is a success – it is being portrayed as a success – but that success needs to be couched against the
issues faced in back offices. 9 million applications – yippee! I anticipate 8 million are duplicates! That should be reported.

I am now a bureaucrat. I cannot believe how ‘unhelpful’ I now need to be as a direct result of IER procedures. Common sense has gone to be replaced with ‘the computer says no’.

That said, IER is a success and should be applauded ... but it needs to be brought into the real world, not morphed onto Victorian systems. Annual canvass should go to be replaced with one every 5 years ahead of each general election ... local authorities could be authorised to run more if they wish to / local circumstances dictate. Canvass this year will lead to significant confusion – HEF = ITR → ‘but I’ve already registered’, etc. etc. If we’re genuine about efficiency, let IER become efficient.”

Head of Democratic Services, London

14.6 The issue of combination cannot be allowed to continue in the hope that electoral administrators will continue to cope and to deliver regardless of the complexity and pressure. The AEA is acutely concerned that, unless the issues identified in this report are properly considered and addressed, the structures, processes and people delivering electoral administration will not be able to cope with the additional burdens being placed upon them as each year passes.

"Pressure on the staff - this is no longer realistic. The expectation for our goodwill will end eventually or there will be a crisis and for once we will not deliver!"

Head of Democratic Services/DRO, South East

"Never, ever, again should this be allowed to happen. It would appear that most authorities have got through, and all the MPS are elected. We must not now be put back in the cupboard, only to be wheeled out again for the next challenge. Something has to change - if not the job, then my involvement in it.”

Electoral Services Officer, North East and Yorkshire

14.7 The recommendations outlined in this report will require joint action by those with a role in shaping electoral policy and practice in electoral administration. The AEA looks forward to actively working
with Government, the Electoral Commission and other key stakeholders in moving this agenda forward.
15 Recommendations

15.1 The UK Government should undertake a thorough and UK-wide review of funding, staffing structures (including career progression) and other resources required to deliver core professional electoral services, with the aims of delivering a coherent and efficient structure across the UK, cost effectiveness over time and ensuring that funding for new responsibilities reaches electoral services. (Paragraph 2.23)

15.2 As with other election law, if Fees and Charges Orders remain the mechanism for funding specific elections and referendums, the appropriate Orders should be in place at least six months prior to the date of such elections and referendums. (Paragraph 2.22)

15.3 Fees and Charges should cover the additional costs of administering the electoral registration process in the run up to an election, including absent voting applications and related matters. (Paragraph 2.15)

15.4 The UK Government should bring forward a single Electoral Administration Act in accessible language setting out the high-level framework governing electoral registration, elections and referendums in the UK, with the operational detail of registration, absent voting, and elections contained in secondary legislation, all with the key aim of achieving the simplification and consistency of rules across all electoral administration matters. (Paragraph 2.35)

15.5 Except in cases of unforeseen emergencies, changes to election law should not be applicable to any elections within a six-month period from the date the legislation comes into effect. (Paragraph 2.39)

15.6 Any polls coinciding in the same area on the same day must be combined, but with an upper limit on the number of polls being allowed to take place on any one day (as outlined in the report). (Paragraph 2.30)

15.7 The UK Government should design and implement a clearer and local system of accountability and challenge through the
introduction in election law of a formal complaints system as outlined in the Law Commissions’ provisional proposal 13-17. (Paragraph 2.42)

15.8 A review of all election/poll timetables should be carried out with a view to extending some aspects, as well as standardising a legislative timetable which should apply to all UK elections, containing the key milestones in electoral administration, including the deadlines for registration and absent voting. (Paragraph 3.2)

15.9 Subject to the recommendations of the Law Commission as to the maximum number of polls that can be combined, a review should be carried out as to whether the polls at parish/town/community council elections should be combined with polls at a UKPGE and local elections held on the same day. (Paragraph 3.7)

15.10 The Welsh Forms Order should either be included in the same legislation as the English forms or be laid at the same time as its English equivalent. The Order should contain a Welsh language Form of Front of Ballot Paper template and Form of Back of Ballot Paper template in the future. (Paragraph 3.19)

15.11 The National Audit Office should give a minimum of two months’ notice to a RO when requesting copies of full election accounts and receipts (with the whole of that period finishing earlier than the last day for publishing the notice of election for a pending election). (Paragraph 3.27)

15.12 The UK Government and/or the Electoral Commission be asked to investigate the possibility of establishing a national framework of electoral print suppliers in the interests of securing efficiency, resilience and operational certainty for future elections. (Paragraph 4.9)

15.13 The UK Government should review current legislation and provide further clarification in legislation in relation to second homes as outlined in the Law Commissions’ consultation paper. (Paragraph 4.18)

15.14 The UK Government should amend the legislation to require that applicants for postal votes who request a waiver must have their application attested in line with current arrangements for proxy
applications, but with the attestation extended to a health professional, including a carer. (Paragraph 4.23)

15.15 The UK Government should look to formalise the roles and responsibilities in legislation in relation to tellers and the postal vote code of conduct, so as to be more effective in ensuring integrity. (Paragraph 4.27)

15.16 The UK Government should review the registration of students and care homes under IER, with a view to making legislative changes to allow EROs to directly register people at "institutions". (Paragraph 5.8)

15.17 The UK Government should review the online service with a view to restricting the same person from registering more than once. In addition, consideration should be given to the possibility of a look-up facility to allow electors to check if they are registered before trying to register online. (Paragraph 5.13)

15.18 The UK Government should carry out a review of IER processes and IER during the UKPGE, with a view to implementing legislative changes to improve such processes, including as to whether there is still a need to continue with an annual canvass if all local authorities were provided with software functionality to easily data mine local authority and government databases. (Paragraph 5.26)

15.19 The UK Government should continue to provide sufficient funding directly to EROs to administer IER, to ensure an accurate and complete register is maintained. (Paragraph 5.11)

15.20 The UK Government should end the transition to IER in December 2015. (Paragraph 5.17)

15.21 The Cabinet Office should consider providing additional verification downloads earlier in the election timetable for future elections. (Paragraph 6.9)

15.22 The deadline for applications to register to vote at an election should be changed from midnight to 5 pm to allow for consistency with the postal vote deadline. (Paragraph 6.12)
15.23 The UK Government should consider a review of the registration deadline before elections to allow more time to carry out the additional processes such as the checking of documentary evidence. (Paragraph 6.16)

15.24 The UK Government should consider a review of absent vote arrangements for overseas electors, to ensure a suitable practical solution, so that "last minute" applicants are still able to cast their vote. (Paragraph 6.22)

15.25 The Cabinet Office should review the wording on the registration website to ensure it clearly explains the issues relating to registration, and absent voting administration and options. (Paragraph 6.22)

15.26 The Cabinet Office should ensure that a Welsh language postal vote application form is sent out for electors registering via the Welsh online registration service. (Paragraph 6.24)

15.27 The UK Government should set out in secondary legislation that absent voting applications should substantially adhere to prescribed forms. (Paragraph 7.2)

15.28 The UK Government should change electoral law so as to prohibit the involvement by campaigners in any of the following:

- assisting in the completion of postal or proxy voting applications;
- handling completed postal or proxy voting applications;
- handling another person’s ballot paper;
- observing a voter marking a postal ballot paper;
- asking or encouraging a voter to give them any completed ballot paper, postal voting statement or ballot paper envelope;
- if asked by a voter to take a completed postal voting pack on their behalf, failing to post it or take it directly to the office of the Returning Officer or to a polling station immediately;
- handling completed postal voting packs at all. (Paragraph 7.7)

15.29 The UK Government should review and consider the circumstances for emergency proxy applications, including the deadline for receiving such applications. (Paragraph 7.23)
15.30 The UK Government should review the current timetable in relation to the deadline for applications to register, the objection period and the deadline for applications for an absent vote arrangement, especially when being sent abroad. (Paragraph 7.29)

15.31 The UK Government should review the requirement for hand delivery of nomination papers. (Paragraph 8.6)

15.32 The UK Government should bring forward legislation to remove the requirement for subscribers on nominations. (Paragraph 8.13)

15.33 The UK Government should review the use of commonly used names, so that a forename can be used as a commonly used name on a ballot paper. (Paragraph 8.16)

15.34 The UK Government should review the deadline for applications to change party descriptions and emblems, so that it is set at a date which ensures the Electoral Commission website is updated well before the first nomination paper is received. (Paragraph 8.19)

15.35 The UK Government should review the home address provision in relation to the nomination process for candidates acting as their own election agent. (Paragraph 8.24)

15.36 The UK Government should review the issue of deposits for all elections where they currently exist. (Paragraph 8.29)

15.37 Consideration should be given to the wording of any national registration campaign prior to an election, to clarify that there is no need for an elector to take any further action if they have already received their polling card. (Paragraph 9.7)

15.38 The UK Government should:

- review the prescribed voting materials and notices for elections;
- re-consider the design of ballot papers to include numbers against the candidate;
- re-consider the rationale for Corresponding Number Lists and seek more viable solutions, with input from electoral administrators;
- review the purpose, format and timing of the poll card along with other forms of communicating key dates to electors;
- allow sufficient time and opportunity for electoral administrators and printers to input their experience into the development of new voting materials and notices;
bring forward changes to the legislation to allow for these improved forms to be available for use at all elections. (Paragraph 10.1)

15.39 The Electoral Commission should:

- review its procedures to ensure timely bulletins and resources are made available in the future;
- review its nomination pack to include contact details. (Paragraph 10.19)

15.40 The Local Government Boundary Commission should allow sufficient time (i.e. not less than twelve months) to conduct a full polling district and polling place review and the necessary consultations before any final Local Government Boundary Commission recommendations take effect at any election. (Paragraph 11.3)

15.41 The selection of ‘polling places’ should be the responsibility of independent ROs, rather than of local authorities. (Paragraph 11.5)

15.42 The Fees and Charges Order should cover the costs incurred in appointing reserve polling station and count staff and should take into account the costs of appointing additional polling station staff as required, even if it is above the EC ratio. (Paragraph 11.12)

15.43 The UK Government should review the need to start the count of Parliamentary votes within four hours of the close of poll, in the interests of ensuring an efficient count with a reliable and accurate result, together with the health and safety of electoral staff. (Paragraph 12.2)

15.44 The UK Government should review the deadline for the appointment of counting agents. (Paragraph 12.12)

15.45 The UK Government should introduce a system for the electronic delivery, receipt and return of the Writ. (Paragraph 13.2)

15.46 The Cabinet Office should supply the details regarding the return of forfeited deposits to the Electoral Commission by no later than two months before polling day. The Electoral Commission should include these details in the Returning Officer guidance or, alternatively, the details should be included in a pre-election Electoral Commission bulletin. (Paragraph 13.7)
15.47 The Electoral Commission should review the date of data returns following an election and look to simplify form K. (Paragraph 13.10)

15.48 The UK Government and the Electoral Commission should consider developing an online facility for submission of candidates’ election expenses returns, with provision for both candidate and agent to signify secure approval of the final return. Such a system should also provide a means for inspecting the returns, declarations and associated papers. (Paragraph 13.12)

Where appropriate, all references to elections should be taken to include national referendums as well.
Appendix 1

Report Evidence Gathering

The real time reporting options included:

- **Eform** – a red button labelled “Report Election Issues” was placed on the home page of the AEA website. Alternatively, members could click on a link which was included in the AEA newsletter each week. The eform was pre-populated with the members’ name, local authority and contact details and the member only had to complete their job title and the details of the issue, comment or change, and indicate which elections were taking place in their local authority on 7 May. If members were limited for time, they could give a summary and request a follow up call after the elections. The eform red button was launched on 11 March 2015 and was available until the week after the elections.

- **Local Authority Election Log of Issues, Comments and Changes Spreadsheet** – a spreadsheet was made available for members to download. The spreadsheet was for the whole electoral services team to complete, including any additional team members that had been drafted in to act in other roles during the elections. Members were asked to save the downloaded document on a network drive that their whole team could access, giving them the opportunity to log issues and comments as they arose. Electoral services team members were encouraged to complete the log of local and national issues. After the elections, the local issues would help review their elections locally and the spreadsheet was then forwarded to the AEA with any national issues after the elections. The spreadsheet was made available for download from 11 March 2015 and members were asked to return it by 14 May 2015 for consideration in this post-election report.

Post-election reporting included:

- **Online survey of AEA members** – the AEA published an online survey questionnaire via Survey Monkey consisting of 61 questions which included feedback on all aspects of the elections including:
  - Timing: Elections and Combined Polls, Statutory Timetables, and Legislation
  - Planning, Management and Performance
Individual Electoral Registration Transition
Individual Electoral Registration
Absent Voting
Standing for Election and the Campaign
Election Public Awareness and Participation
Managing the Polls
Verification, Count and Post-Election Returns

The survey went live on 11 May 2015. All AEA members received an email with the link to the survey and responses were initially requested by 1 June 2015 following which an additional week was given for responses.

**AEA branches post-election review workshop** – all AEA branches were encouraged to hold a post-election review as part of their branch meeting or as a workshop following the elections. The format of the workshop and templates to facilitate the post-election review were made available and circulated to all branches on 12 May 2015. The workshop was facilitated by branch officers. AEA members worked in small groups. At the end of the group discussions, members were given the opportunity to review the findings. Following the workshop, a representative from the branch collated the responses before forwarding the results to the AEA for consideration in this post-election report.
Appendix 2

The red font demonstrates the remaining inconsistencies in relation to those elements of the statutory deadline dates between the two elections. The purple font provides additional explanatory information.

<table>
<thead>
<tr>
<th>Event</th>
<th>Election</th>
<th>Working days before poll (deadline if not midnight)</th>
<th>Date (deadline if not midnight)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Dissolution of Parliament</td>
<td>UKPGE</td>
<td>25 days</td>
<td>Monday 30 March</td>
</tr>
<tr>
<td>2. Publication of notice of election</td>
<td>Local, Mayoral</td>
<td>Not later than 25 days</td>
<td>Not later than Monday 30 March</td>
</tr>
<tr>
<td>3. Receipt of Writ</td>
<td>UKPGE</td>
<td>24 days</td>
<td>Tuesday 31 March</td>
</tr>
<tr>
<td>4. Publication of notice of election</td>
<td>UKPGE</td>
<td>Not later than 22 days (4pm)</td>
<td>Not later than 4pm on Thursday 2 April</td>
</tr>
<tr>
<td>5. Delivery of nomination papers</td>
<td>UKPGE</td>
<td>From the day after the publication of the notice of election until the sixth day after the date of dissolution</td>
<td>Between 10am and 4pm on any working day after publication of notice of election until Thursday 9 April</td>
</tr>
<tr>
<td>6. Delivery of nomination papers</td>
<td>Local, Mayoral</td>
<td>From the date and time stated on the notice of election until 4pm on the nineteenth day before polling day</td>
<td>On any working day during the hours stated on the notice of election until 4pm on Thursday 9 April</td>
</tr>
<tr>
<td>7. Deadline for delivery of nomination papers</td>
<td>All</td>
<td>19 days (4pm)</td>
<td>4pm on Thursday 9 April</td>
</tr>
<tr>
<td>8. Deadline for withdrawals of nomination</td>
<td>All</td>
<td>19 days (4pm)</td>
<td>4pm on Thursday 9 April</td>
</tr>
<tr>
<td>9. Making objections to nomination papers (except for objections on the grounds that an individual candidate may be disqualified under the Representation of the People Act 1981 – see Commission guidance)</td>
<td>UKPGE</td>
<td>On 19 days (10am to 5pm), subject to the following: Between 10am – 12 noon objections can be made to all delivered nominations Between 12 noon and 5pm objections can only be made to nominations delivered after 4pm, 20 days before the poll</td>
<td>Between 10am and 12 noon on Thursday 9 April objections can be made to all delivered nominations Between 12 noon and 5pm on Thursday 9 April objections can only be made to nominations delivered after 4pm on Wednesday 8 April</td>
</tr>
<tr>
<td>10. Deadline for the notification of appointment of election agent</td>
<td>UKPGE, local and Mayoral (not parish/community)</td>
<td>19 days (4pm)</td>
<td>4pm on Thursday 9 April</td>
</tr>
<tr>
<td>11. Publication of statement of persons nominated, including notice of poll and situation of polling stations</td>
<td>UKPGE</td>
<td>If no objections: on 19 days (at 5pm) If objection(s) are made: not before objection(s) are disposed of but not later than 18 days (4pm)</td>
<td>If no objections: at 5pm on Thursday 9 April Objection(s) made: not before objection(s) are disposed of but not later than 4pm on Friday 10 April</td>
</tr>
<tr>
<td>12. Publication of first interim election notice of alteration</td>
<td>All</td>
<td>On 19 days</td>
<td>Thursday 9 April</td>
</tr>
<tr>
<td>Event</td>
<td>Election</td>
<td>Working days before poll (deadline if not midnight)</td>
<td>Date (deadline if not midnight)</td>
</tr>
<tr>
<td>---------------------------------------------------------------------</td>
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</tr>
<tr>
<td>Publication of statement of persons nominated</td>
<td>Local, Mayoral</td>
<td>18 days (4pm)</td>
<td>4pm on Friday 10 April</td>
</tr>
<tr>
<td>Deadline for receiving applications for registration</td>
<td>All</td>
<td>12 days</td>
<td>Monday 20 April</td>
</tr>
<tr>
<td>Deadline for receiving new postal vote and postal proxy applications, and for changes to existing postal or proxy votes (note must be IER electors to receive a postal vote or act as a proxy)</td>
<td>All</td>
<td>11 days (5pm)</td>
<td>5pm on Tuesday 21 April</td>
</tr>
<tr>
<td>Deadline for receiving new applications to vote by proxy (not postal proxy or emergency proxies)(note must be IER electors to act as proxy)</td>
<td>All</td>
<td>6 days (5pm)</td>
<td>5pm on Tuesday 28 April</td>
</tr>
<tr>
<td>Publication of second interim election notice of alteration</td>
<td>All</td>
<td>Between 18 days and 6 days</td>
<td>Between Friday 10 April and Tuesday 28 April (inclusive)</td>
</tr>
<tr>
<td>Publication of notice of poll</td>
<td>Local, Mayoral</td>
<td>Not later than 6 days</td>
<td>Not later than Tuesday 28 April</td>
</tr>
<tr>
<td>Publication of final election notice of alteration</td>
<td>All</td>
<td>5 days</td>
<td>Wednesday 29 April</td>
</tr>
<tr>
<td>Deadline for notification of appointment polling and counting agents</td>
<td>All</td>
<td>5 days</td>
<td>Wednesday 29 April</td>
</tr>
<tr>
<td>First date that electors can apply for a replacement for lost postal votes</td>
<td>All</td>
<td>4 days</td>
<td>Thursday 30 April</td>
</tr>
<tr>
<td>Polling day</td>
<td>All</td>
<td>0 (7am to 10pm)</td>
<td>7am to 10pm on Thursday 7 May</td>
</tr>
<tr>
<td>Last time for re-issue of spoilt or lost postal votes</td>
<td>All</td>
<td>0 (5pm)</td>
<td>5pm on Thursday 7 May</td>
</tr>
<tr>
<td>Deadline for emergency proxy applications (note proxy must be IER registered)</td>
<td>All</td>
<td>0 (5pm)</td>
<td>5pm on Thursday 7 May</td>
</tr>
<tr>
<td>Last time to alter the register due to clerical error or court appeal</td>
<td>All</td>
<td>0 (9pm)</td>
<td>9pm on Thursday 7 May</td>
</tr>
<tr>
<td>Unconfirmed existing elector with postal vote application already submitted can bring in evidence to become IER registered</td>
<td>All</td>
<td>0 (10pm)</td>
<td>10pm on Thursday 7 May</td>
</tr>
</tbody>
</table>

After the declaration of result
<table>
<thead>
<tr>
<th>Event</th>
<th>Election</th>
<th>Working days before poll (deadline if not midnight)</th>
<th>Date (deadline if not midnight)</th>
</tr>
</thead>
<tbody>
<tr>
<td>27.</td>
<td>Delivery of return as to election expenses</td>
<td>Parish/ community Within 28 calendar days after polling day</td>
<td>By Thursday 4 June</td>
</tr>
<tr>
<td>28.</td>
<td>Delivery of return as to election expenses</td>
<td>UKPGE, local and Mayoral (not parish/ community) Within 35 calendar days after the date the election result is declared</td>
<td>If result declared on Thursday 7 May: by Thursday 11 June If result declared on Friday 8 May: by Friday 12 June</td>
</tr>
<tr>
<td>29.</td>
<td>Deadline for sending postal vote identifier rejection notices</td>
<td>All Within the period of three months beginning with the date of the poll</td>
<td>By Thursday 6 August 2015</td>
</tr>
</tbody>
</table>