

# Levelling Up, Housing and Communities Committee

## Oral evidence: Electoral Registration, HC 841

Monday 17 April 2023

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### [Watch the meeting](#)

Members present: Mr Clive Betts (Chair); Ian Byrne; Mrs Natalie Elphicke; Kate Hollern; Paul Holmes; Andrew Lewer; Mary Robinson; Nadia Whittome; Mohammad Yasin.

Questions 67 - 154

### Witnesses

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

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

### Examination of witnesses

Witnesses: Peter Stanyon, Pete Wildman and Amanda Edwards.

**Chair:** Welcome, everyone, to this afternoon session of the Levelling Up, Housing and Communities Committee. This afternoon we are looking at the subject of electoral registration. That is the register that people apply to go on so that they can vote in both local and national elections. We will explore why a lot of people are missing from the register and what more can be done to improve the accuracy and completeness of the register.

Before I come to the first of our two panels, I will ask members of the Committee to put on record any interests they have that may be directly relevant to this inquiry. I am a vice president of the Local Government Association. I will go around the table.

**Mohammad Yasin:** I am a member of the Bedford town deal board.

**Kate Hollern:** I employ a councillor in my office.

**Nadia Whittome:** I am a member of the One Nottingham board.



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**Paul Holmes:** I have nothing to declare.

**Mary Robinson:** I employ a councillor.

**Andrew Lewer:** I am a vice president of the LGA.

**Chair:** Now I will come over to our panel. Thank you very much for coming this afternoon. We have two witnesses with us in the room and one online. I will come to our witnesses in the room first

**Pete Wildman:** I am the electoral registration officer for central Scotland. I am also the chair of the electoral registration committee of the Scottish Assessors Association, which is the 15 Scottish electoral registration officers and their senior staff.

**Peter Stanyon:** I am the chief executive of the Association of Electoral Administrators.

**Amanda Edwards:** Good afternoon. I am the electoral services and civil registration manager at Carmarthenshire Council in Wales and currently the Welsh chair of the Association of Electoral Administrators.

Q67 **Chair:** Thank you all very much for coming. We hope to have a wealth of expertise and information from you this afternoon because, clearly, you have very responsible jobs in the different parts of our country. We are doing the inquiry because concerns have been raised about the current electoral registration system. Do you think it requires fundamental change, or would a little twist here and there solve the problem?

**Pete Wildman:** On the whole, it operates efficiently. Most people can register to vote and take part in elections. There are always things that could be done to improve it. We will all be very interested in the Electoral Commission's completeness and accuracy survey when published at the end of the year. That will give us an indication of how the new-style canvass is working on a longer-style operation. As with any system, it requires change, although it has had a lot of change, so to a certain extent it probably needs a little rest.

**Peter Stanyon:** I would not disagree. Pete is absolutely right that an awful lot of change has taken place in the recent past. It was household registration, whereas it is now individual electoral registration. There is a lot of interest in whether there ought to be auto-registration to make the system slightly more inclusive. I agree with having a degree of, "The system is here and people can register to vote". The deadline for registration for the local elections is today, so applications can be made until midnight this evening—12 days out from the poll.

There is a lot of opportunity for individuals to get registered, but there are still flaws in the system. The situation that has now developed is that we almost have event-led registration. The election will drive the registration for elections more significantly now than the household



canvass, which traditionally did that particular route. It is tweaks around the edges more than anything.

Q68 **Chair:** We will come on to the annual canvass in due course. What you have just described does not sound like a system that is fit for purpose.

**Peter Stanyon:** The system has been around since the 1800s. In trying to take it down to individuals versus households, what is the building block that we work to? I think at the end of the day there is the need to think about residency, who is entitled to register, and we may come on to franchise points very shortly. The system works, but it is debatable whether it is the smoothest system.

**Chair:** I might come back to that point in a minute. Amanda, do you want to tell us your view?

**Amanda Edwards:** Yes. I have been in the electoral world for many years and it is far less paper heavy than it used to be. Years ago we would have a form for every household, with a huge team of canvassers going out knocking on doors and we would have 30 temporary staff in the election at canvass time to check every form against every address. It was heavily resourced and budget-wise it cost a fortune. We have moved away from that to giving the responsibility to the elector. They can register any time during the evening when they are watching "Coronation Street".

It is so easy and simple now to go online and register. However, with the way that the system works, I cannot put my hand on my heart and say that our register is 100% accurate. We have come a long way but, as Peter said, there are flaws still in the system that we need to address.

Q69 **Chair:** It sounds a bit complacent to say the system is generally okay with one or two flaws, when it is about 90% accurate—isn't it? There are about 8 million people who could register who don't. That does not sound like a system that is working terribly well.

**Amanda Edwards:** Carmarthenshire is a pretty static area. We have pockets of the area that are multiple occupation—flats—where there is a lot of movement but in the majority of our area people don't tend to move from one year to the next. We are sending letters out every year saying, "You have matched with the DWP records or with our internal records and if there is no change you need not do anything".

We cannot audit whether people are reading those forms, checking the information on the form and then suddenly realising little Johnny has now moved out and got his own property. We take it at face value that people have read those forms and that the information is correct. As people said, it tends to be event-led, where the poll cards come through the door a couple of weeks before an election and they suddenly realise that there is one for little Johnny, who no longer lives there.



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It is very much event-led. You also have the hard-to-reach areas and over the years we have tried all initiatives. We have tried engaging with landlords, houses in multiple occupation, and people who live rurally who do not want to be found for all sorts of reasons, but you will always have those hard-to-reach areas that are a challenge.

**Q70 Chair:** You have looked at introducing automatic registration in Wales. Have far have you got with that?

**Amanda Edwards:** Do you mean in Wales specifically?

**Chair:** Yes.

**Amanda Edwards:** I know that the Welsh Government are currently looking at it and possibly would like to pilot it in one or two years, but I have little information other than that.

**Q71 Chair:** Amanda has referred to fairly stable areas but, Peter Stanyon, you have worked in London and some parts there will not be very stable, with a high churn of voters. Is that a different challenge and does the present system allow electoral registration officers to get on top of that sort of area?

**Peter Stanyon:** There has been a change to the system since I came into electoral services many moons ago. Back in the day, it was household registration one day a year and it could not change. The change that has come through now has been step by step to allow for the changes to the register to the current system, whereby, as Amanda mentioned, you can sit on your sofa at up to five minutes to midnight tonight and make an application to register. There has been improvement with that. For the high churn areas, it gives a greater degree of flexibility to allow individuals to make the registration.

Amanda made two important points about the importance of registration. It still remains the responsibility of the elector to get registered, so an awful lot of work goes on to encourage people to register, but the second point is that the ability for an electoral registration officer to—forgive the terminology—force registration is limited. You want to encourage them to register but you don't want to force them to register, so there is a difficult conundrum where 90% of people may be registered but do the 10% want to be registered? Do they know about the system? There are lots of underpinning questions, which make it slightly more difficult to be sure of the reasons that people do not register.

**Q72 Chair:** People can be fined for not registering. Has that ever happened?

**Pete Wildman:** In theory you can issue a notice of requirement to register but that does not result in a registration. They could get a fine but still choose not to register. Fundamentally, it is a voluntary system. It is up to people to do it. It is very clear from all the figures that it is the people who move frequently or have moved recently who tend not to be registered. It is almost about how you make the process easier for them



to register. I think they are registering at the point at which they need to use the service—when there is an election. That is the benefit of being on the register, and they are leaving it until that point to do it.

**Chair:** We have slightly different systems in the different parts of the UK, so we will explore those.

Q73 **Andrew Lewer:** Before I start, on that last point about fines, do you think it risks bringing the system and the sanctions regime into disrepute that the “you could be fined £1,000 and go to prison” sort of thing appears on all of these forms, when we all know that never happens?

**Pete Wildman:** You sometimes get feedback from people that the threat in the letters seem quite heavy. Equally, it is important to make sure that people understand what the legal sanction is. I am not sure whether it is a good use of money.

Q74 **Andrew Lewer:** Moving into some devolved responsibilities, DLUHC has acknowledged that devolution of responsibility for elections policy in England and Wales has resulted in some divergences of practice, which has made things more complicated for electors who have different eligibility criteria in different elections. What would you say needs to happen practically to mitigate that sort of confusion for voters, and what will happen on an election day if different elections are combined?

**Pete Wildman:** We have had divergence in franchise between the local government and parliamentary registers for some time. EU citizens used to be able to vote in local government elections and EU elections and not in UK parliamentary elections. In Scotland that has continued and expanded, so 16-year-olds can vote in Scottish and local government elections, and now foreign nationals can register and vote. There is less confusion because the process is the same. They apply and we put them into the correct part of the register and they get a poll card that advises them. We get relatively little confusion at that point. I think the confusion would be where the processes are different: if you had to do two separate things, rather than us sorting out where the elector ends up on our register.

**Peter Stanyon:** I think the key will be comms. It sounds like Scotland is slightly further down the line and I am sure when Amanda comments she will make the same point that the system for Wales will be even more complicated because there will be a degree of local government election and the police and crime commissioner, which runs to the same franchise as the UK parliamentary. It is a reserved power, so there is a degree of greater confusion in Wales.

As Pete mentioned, it is the processes that come in effectively in the tranche 2 part of the Elections Act—things such as absentee voting, the length of time for applications, the differences in qualifying foreign nationals and 16 and 17-year-olds. Some of those will be easier to explain to the electorate because they will get a poll card that says, “You



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are voting in these elections” and that is it. If there is a combined poll, there is a danger that there will be people coming with different franchise requirements. In the Wales situation, there could be a danger that individuals will be registered for the parliamentary element but not for the local government, or vice versa.

There will be a lot of training for the staff and comms for the electorate to make sure that they are aware. How can that be addressed? It is really about thrashing out what the issues are and then it will be for legislators to determine whether that is the correct route to go down in each of the three nations in that way.

**Amanda Edwards:** As Peter said, we had local elections in Wales last year and we had the Senedd the year before, so we really pushed our comms to get those from the age of 14 to register. We produced videos and did a lot with school governors. We were very proactive in reinforcing the message that your vote is important and now we will be saying, when there is a snap parliamentary election, “But in this one you are not allowed to vote”.

It is almost as if we are rating elections in the eye of a young attainer. It is about getting the messages across for the next however long. If we do have a snap election, it is about how we message that to our 16-year-olds: “We want you to register but you won’t be able to vote at this election”. Those comms can be difficult, particularly when we are doing it bilingually. My concern is how we are dipping in and out of the messages that we are giving to our young attainers.

Q75 **Andrew Lewer:** That seems like more of a concern about things that may be irritating rather than a practical problem for you administrating.

**Amanda Edwards:** I look at it through the eyes of a young person. I am sure for a parliamentary election they would like to have a say on certain issues so it is about getting that message across, educating on what devolved Government do and what central Government do. That needs to come through from a younger age, and we need to instil civic responsibility in them alongside it.

Q76 **Andrew Lewer:** You are tempting me to get into the vote at 16 versus 18 argument, but I won’t. I will ask Pete about Scotland and the outlawing of voting for more than one council at the same local elections.

**Pete Wildman:** The tendency in Scotland in registering for more than one area is: we will not register somebody in another area if it is purely a holiday home. It is only if they are carrying out their main business of life in two different areas. Being on the register in two areas in Scotland in the end is an offence, which probably comes down to whether it is proved to have happened. If it is proved to have happened, somebody has committed an offence and it is against the law, but it is not actively policed as such, if that makes sense.

Q77 **Andrew Lewer:** It does. Do you think that change has helped prevent



fraud or has it not been significant enough to assess that and, therefore, for the UK Government to consider it?

**Pete Wildman:** I do not think it has been properly tested. There is a question about whether you should be able to register in two places or not. That is quite a big question. There is all the discussion around duplicates on the register. But when people can legitimately register twice—for example, students can register twice; that goes back to the days before postal voting and demand. How you would separate out people who are legitimately on the register twice from those who are registered incorrectly twice would be quite difficult. You could also have people with the same name and same date of birth.

There are some quite big challenges to identifying people being incorrectly on the register twice. There is also a degree of lag with moving. It can take seven weeks from when you move to when the register is updated, so you can appear on the register twice quite legitimately for a short period.

Q78 **Andrew Lewer:** One of the concerns has been about the rate of registration among attainers in different parts of the country. I will ask Pete first and then Amanda: what is your assessment of the rate of registration among attainers in Scotland and Wales, and what are the effective approaches that you have been using to get people coming into voting age to register to do so?

**Pete Wildman:** In Scotland 14 and 15-year-olds have been able to register since 2015. It has been fairly consistent at about 40,000 year on year. We have found that because 14 and 15-year-old registration is of those in full-time education at that point, and most pupils are going through the state system in Scotland, each local authority has an agreement with their electoral registration officer to supply them with school pupil details. We have similar arrangements with the private schools. We then write out and invite each pupil to register. Pre-covid the Electoral Commission ran “Welcome to Your Vote” week across all schools. It was a way of actively promoting it. In many ways, if they are in education you have an opportunity to capture all of them at the same time. Once they go past 16, they are in different forms, some are not working and some are in different situations, so it is quite hard to get the message out.

It has worked well, albeit that covid has put pressure on the schools. There has been less opportunity. They have been focusing on the education side rather than maybe some of the registration promotion work, but we will see that coming through in future years as things return more to normal.

Q79 **Andrew Lewer:** Thank you. Amanda, similarly, what approaches have been used for these attainers to register to vote across Wales by your colleagues?





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**Amanda Edwards:** Most of us in Wales are very fortunate to have good relationships with our director of education. Like Scotland, we get copies internally of our school data. That is for pupils who are home schooled, in special schools, private schools and council-owned schools. We use that data. We also then send them a birthday card on their 15th, 16th, 17th and 18th birthday, just to keep the message going that they are on the register and entitled to vote.

We try to home in on any sort of council-led events where they are engaging with young people to see if we can have a place in that seminar or engagement, which happens throughout the year. There is always a presence at events like the Eisteddfod. Young Farmers in Wales have a lot of support and lots of members. We try to tap into those sort of organisations.

Q80 **Chair:** Issues of data—and concerns about the security of data—are often raised in these discussions. People do various actions as a citizen that give the Government or state in various forms information about them. People apply for a passport or a driving licence or—talking about people moving home—they providing information when they move home. Should that sort of information be automatically passed on to EROs?

**Pete Wildman:** I would probably say yes. Something that could be looked at is how you could almost notify all Government Departments that you have moved and you register, so if you are on the register already and you move address, it is almost like saying, “Can you move my registration for me?” without the person having to go through the application process.

**Peter Stanyon:** I agree. From the other perspective, there is the Tell Us Once service where you notify a death, for example, and that is shared among many Government Departments. I think all the sector has been asking for a while for greater access to the particular data sources that might be able to produce the hook for somebody who is missing off the electoral register.

Pete’s point about the moving of an elector simply because you have trusted data that does so would very much simplify the situation. It would just require access to data meaning that an electoral registration officer can invite that individual: “We believe there has been a change in your circumstances. Do you wish to re-register?” We applaud anything that gives raw data that is of value and quality.

**Chair:** How do you feel about that in Wales?

**Amanda Edwards:** Yes, I agree. Electors are familiar now with going on to that gov.uk website, seeing that front page and registering for their passport, driving licence and voter ID. That sort of facial image that you see on screen is familiar to all and I think people would be quite happy to either opt in to register or certainly to give their information via those





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portals as a quick and easy way of registering, but with the option possibly of opting out if they wish to.

Q81 **Chair:** Would you be looking for one portal for people to put their information into or would you be looking for a Government Department, say DVLA, that gets the information to be able to pass it on to EROs?

**Peter Stanyon:** There are a number of databases that depend on the data sharing between DVLA, HMRC—all those bodies. I think the crucial bit is to identify the databases. It would be reasonably straightforward if it ends up being that you give permission to the DVLA to pass that information into the registration officer and that can be done by gov.uk for electoral registration. As Amanda mentioned, that is the place that EROs go to. The crucial bit is that there are a number of data sources that may not be complete themselves to get everybody across the board but when you take one, two or three together, you are picking up the ability to identify people in a much more efficient way.

Q82 **Chair:** Should that information then be available for EROs to automatically change the register or simply to advise them they have someone to chase whose information is not accurate?

**Pete Wildman:** I quite like Peter's suggestion of Tell Us Once—that you tell the Government once that you have moved and then it filters out across the sector to allow the independent movements to be captured. It depends on the circumstances. If the elector opts in, I see no reason for that information not to be passed on to the ERO and it is up to the ERO to proactively invite.

We mine local data sources—things like council tax data. In my own office I am also responsible for the valuation list for council tax banding. When we put a new house on the council tax list we will invite the person to register at the same time. More could be done to make it a more seamless exercise for the member of the public rather than dealing with lots of different Departments.

Q83 **Chair:** Why should people be able to opt out of having a change to their driving licence passed on as information to the ERO but not a change to their council tax position?

**Pete Wildman:** I think that comes back to the fact that paying council tax is mandatory and registering to vote is voluntary, at the end of the day.

**Chair:** Yes, but the council tax information is available to you. Nobody has to tick a box to say it can be.

**Pete Wildman:** No, true. Sorry, I misunderstood the question.

Q84 **Chair:** Why should someone have to tick a box to say it is available for the DVLA when you go to the council tax information and nobody has to tick a box there?



**Pete Wildman:** It is easier because you can contact the data controller locally and say, “Under regulation 23, can you share that data with me?” For me as an ERO to approach a large Government Department—who do I approach, how do I set up the data-sharing agreement or those that have the statutory power? Mechanically making that happen is quite a significant thing.

**Peter Stanyon:** Linking to what Pete is saying, whether it is an opt-out or it is a flag—however it is done—there are dangers of auto-registration. With the system we have currently in England, qualifying foreign nationals cannot register. They can in Scotland and Wales. The straightforward passporting from DVLA into the ERO, with the assumption they are getting registered, would need to be analysed by the ERO, but I take the point that it is for the ERO to determine whether the individual satisfies the threshold to be registered or even be invited to be registered.

Q85 **Chair:** Any more data sources? We have talked about passports and driving licences. Are there any more data sources that ought to be available to you?

**Amanda Edwards:** In Wales all landlords have to be registered with Rent Smart Wales. Even if we could get access to landlords to help us with those hard-to-reach areas and their flats, that would certainly be a help for us in Wales. There would have to be a number of different records. As you say, DVLA on its own is not enough because once you get to 70 you have to reapply for your passport. If you are surrendering and don’t bother telling the DVLA—circumstances could change. There are lots of things that would need to be considered, including who we would need to data share with. It could be organisations like Welsh Water, firearm licensing. There are lots of bodies that could feed into it, and it would be for us to then make the determination as to whether we can process those applications.

Some people don’t register or vote on religious grounds. There are the vulnerable and people who register anonymously. We have to consider those sectors of people as well.

**Chair:** Are there any others that you might see, Peter or Pete?

**Peter Stanyon:** Not specifically. We do not know what databases are held of the standards that are required across various Government Departments. As Amanda mentioned, that could include water authorities, and the gas and electricity authorities. They are the sort of places where you have got that tied to at least one name in an area, but it is about pulling them all together to allow the electoral registration officer to make the appropriate—

Q86 **Chair:** Is DWP a resource you would point to?

**Pete Wildman:** Amanda makes a very fair point around anonymous electors. There could be a real danger if you just automatically put people



on the register. You could inadvertently expose somebody's name in a public record who would normally have registered anonymously. There are some concerns about it. I favour an automated process, where you invite the person to register but you have done all the work: "Do you want to confirm you are happy to add?" rather than put somebody on the register, which is something we cannot do at the moment. We rely on the individual to register themselves. Things like mobile phones and banks probably have bigger databases than some of the Government ones.

**Q87 Chair:** Moving on to a couple of other issues, concerns are sometimes expressed about the open register being sold to commercial organisations. Would you like to see that abolished? Is it worth keeping?

**Peter Stanyon:** That is certainly the view of the AEA. We think it should be abolished. The electoral register should be for the statutory purposes of elections and for security for credit referencing, but nothing beyond that. At the moment, anybody could walk into Pete or Amanda's office and purchase quite high-quality data. Yes, it may well be only 50% of the electoral register but there are no restrictions on what that data can be used for, which flies in the face of everything else around data.

**Chair:** Pete and Amanda, do you have any different view on that?

**Pete Wildman:** No, I think it is similar. The National Records of Scotland in 2021 said that 6% of people opted out. You almost wonder whether it is something you opt into in the same way that you opt into your data being used for marketing purposes, if you were going to keep it as a document.

**Q88 Chair:** Finally from me, I want to ask about the ability for voters to go online and check. Everyone uses online these days but it is a bit cumbersome to find out if you are registered at present, so why can online checking not be brought in? Amanda, any views on that in Wales?

**Amanda Edwards:** On our website there is a means of finding out if you are on the register. You can fill in an e-form and that will come through to us, and we can check if you are on the register. I know a lot of my colleagues have that in Wales. A lot of people ring up daily on the grounds of credit—for example, if they have gone for a mortgage and they have been declined a mortgage, and there might be just a glitch in the way that we have the address recorded as opposed to what they have informed the banks or the building societies. A lot of the queries come through by phone or by email, and a lot are to do with credit reference checking—if they have had an issue. We try to cascade to people via our website that there is a way of checking if you are on the register.

**Peter Stanyon:** Some local authorities have their own databases set up. It is the classic data versus accessibility: the question of whether I can log on to your personal details, and what other checks need to be in place? They have gone around that in some local authorities by registering with citizen registrations. Yes, in the ideal world it would be nice to say you can check that you are registered, you have a postal vote



or whatever it might be. That would take an awful lot of pressure off the officers but you have to balance that against the data protection implications.

**Pete Wildman:** I totally agree. It is a really nice idea. The tricky bit is providing sufficient privacy and protection for the individuals so that they cannot be located by somebody looking for them for whatever purpose.

Q89 **Chair:** Where authorities have done what you said, Peter, have there been any problems of privacy?

**Peter Stanyon:** It is not that there have been any problems with privacy. It is that they would have to register effectively with the local authority to then get the authority to see their own records. It is very much along the lines of the two-factor authentication type approach, but that will be different systems by different local authorities—not just for electoral services, but for all services provided by the local authority.

**Chair:** Thank you for that. Moving on now to the annual canvass—Mary.

Q90 **Mary Robinson:** The Government have brought forward legislation to try to improve the annual canvass in Great Britain. Has it improved?

**Pete Wildman:** It is certainly a lot cheaper to run and administer than the old-style canvass. It is effective and it identifies change. In Scotland, and certainly in my own area, we find that some houses that are going down route 2 are persistently ones that end up in route 2 each year. Even though we will personally contact the property and go there, they are quite often the same properties year after year and no response, but on the whole it does work. As I said, it will be interesting to see what the completeness and accuracy survey says as to whether you would need to do something more extensive over so many years, but for me it is better than it was.

**Mary Robinson:** I see nodding heads.

**Peter Stanyon:** I certainly agree that it is far more efficient and it is a simple system to administer. I am slightly more glass half-empty than Pete. I think the crucial test will come at the next national poll. We have made reference—and Amanda certainly made reference—to event-led registration, which has been on the increase since 2019 and the referendum before that, for example. The crucial test will come ahead of the next general election. In fact, there is a national election next year with the PCCs anyway and the London mayoral. That will show whether the spikes that we expect in registration are of the same levels as previously—therefore it has been a success—or whether they are significantly higher. Much lower is even better, but ultimately we do not know until we get to that. The completeness and accuracy survey will be crucial to giving us a litmus test as to where we are.

Q91 **Mary Robinson:** I do not want to pre-empt that but, assuming that there may be room for improvement, we have received written evidence



suggesting that young people should be automatically enrolled when they reach 16 and are issued with their national insurance number. Do you support that?

**Peter Stanyon:** From my perspective, it is very similar to the answer Pete gave a second ago. "Automatic" assumes that the individual is first, entitled, and secondly, does not want to register anonymously, for example. There are a number of factors in there. I think the crucial bit is the sharing of that data to say that every 16-year-old at the point they get their national insurance number is notified to the relevant electoral registration officer, and 99% will be passported on. It is almost like an opt-out rather than opt-in in that way, but we have to be mindful that there will be personal circumstances that mean a judgment needs to be made.

Q92 **Mary Robinson:** Do you think that would get some support if it was put forward?

**Peter Stanyon:** I don't think it would be unsupported—I suppose that is the opposite way of answering the question. A lot of it comes down to the understanding within education about the importance of democratic institutions and democracy; that this is part of that process; and, wider than that, things such as credit and the like—that if you are not registered, you will not have the same access to services. That by itself would be good, but it would be much better with a wider comms understanding and awareness raising within that part of the community.

Q93 **Mary Robinson:** What would have to happen to allow or permit the electoral registration officers to update information? What would need to be put in place?

**Peter Stanyon:** Again, it comes down to data sharing. Amanda and Pete will be able to give a far closer history of this. It is the understanding that the data that somebody holds is important not just to them but to the electoral administration side. It is often the case within a local authority that the drawbridge has come up and "our data is our data" when in fact the electoral registration officer has the right to that data. If the right is there, it needs to be understood it is there for the sole purposes of inviting an individual to register and nothing else. There is still a bit of a misconception as to why that data is there, but if it is there and it is available, every single ERO will lap that up without any doubt at all.

Q94 **Mary Robinson:** Would automatic enrolment on the issuing of the national insurance number in any way make the register less accurate?

**Peter Stanyon:** It would be more complete. Whether it is more accurate—they are two different factors for the very reason I talked about. It will be complete with every single name on. However, it may be less accurate because those individuals might not want to be or might not be entitled to be on it.

**Mary Robinson:** Amanda, you have been nodding. Do you have



anything to add to that?

**Amanda Edwards:** Only that in Wales your national insurance number is issued at 15 years and nine months of age, but we have to start collating information on attainers from the age of 14, so there is that gap for us in Wales. We would still need to do some data gathering via our education records as opposed to that automatic route for devolved elections.

Q95 **Mary Robinson:** Are election records a more accurate and satisfactory way of doing it?

**Amanda Edwards:** We have had issues, particularly with the younger element of the attainers. If they are from a family that has split up, they spend half the week with the mum and half the week with the dad or the grandparents. We register them in one particular place, which is the source we have from education data, and then it comes to light in an election, "I don't want them registered there. I want them registered with me". It is a very small element but that has come about through education records, but on the whole it is very successful. They like having that birthday card as well. I think it empowers them that they are on some official record.

**Chair:** Thank you for that. Moving on now to the issue in the Elections Act of voter ID—Nadia.

Q96 **Nadia Whittome:** It is just over two weeks until the local elections in May. The Association of Electoral Administrators has previously warned that there was no longer enough time to solve outstanding issues to an acceptable standard. The Local Government Association also warned that electoral administrators had not been given sufficient time to implement changes "without risking access to the vote". My question is: where are we at now? What is your current assessment of the capacity of electoral administrators to implement and enforce these voter ID changes and, secondly, the impact on voters?

**Peter Stanyon:** I think when we made the statement that it was too late, that was before the Government brought changes to the implementation timetable, which was basically to postpone other elements of the Elections Act and concentrate solely on the voter ID and accessibility changes that are in the Act. By doing that, they gave a degree of wobble room. It is not ideal four months out—which was when the legislation was passed—from these particular polls. Where we are at now is really that everyone's heads are down. We are certainly not picking up any horror stories. We are also not picking up that this is a straightforward thing to deliver.

In these last two and a half weeks prior to the election, the majority of polling stations have started being trained as we speak. They are now beginning to understand the questions they will need to ask, the barrier that has potentially been put in there before you can issue the ballot paper, the challenges around data collection, data sharing and things like that. People will want to know what the implications have been.





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There are lots of unanswered questions still but I can hand on heart say, with a fair degree of confidence, that in every single area the elections will be delivered safely. Will the elections be delivered to the standards that everybody wants to achieve? Possibly not. Will they be delivered to safe standards? Yes, and they may be two slightly different things in that respect.

When it comes to the individual electors—the voters—as we speak poll cards are hitting mats; they should have already hit mats anyway. The figures of people applying for voter authority certificates are beginning to climb. Work is ongoing, but the proof will be on 4 May when we get to 7 am to see the effect of any local comms, and the Electoral Commission's comms. It is about understanding how that will roll out in polling stations. Do the staff fully understand what they need to do now, because there is a huge raft of changes? I would not say it was not a complicated system previously but this is adding a degree of complexity on top of that. The staff themselves are the ones who will have to deliver. From the ERO perspective, things are going as smoothly as can be planned, but 4 May will be the proof in the pudding.

**Q97 Nadia Whittome:** How about your assessment of the impact that these changes will have on voters?

**Peter Stanyon:** Again, it is difficult to say until people walk through the door of a polling station. We hope—and we are certainly receiving feedback anecdotally—that a lot of work is going on explaining to the local electorates that you need to have one of these forms of ID. The Electoral Commission's campaign has been running for a while and that has been supported in most local authority areas by local targeting. It is an almost impossible question to answer.

The information is out there and it goes back to the point that Amanda made earlier about forms. Unless people are receptive to that change, they may arrive at a polling station and then have to have the conversation about what they need to do now—to go home and get the ID and come back later. We are stepping into the unknown; that is probably the best way of describing it. There is very limited good practice. The good practice came from the pilots. This is being rolled out across certainly 50% of England and possibly higher. The proof will be in the pudding on 4 May.

**Nadia Whittome:** Thank you. Pete, what do you think?

**Pete Wildman:** At the moment we have no elections in Scotland, so we are very much sitting and watching what happens in England with a great deal of interest. At this stage there has been not a lot of uptake in local authorities in Scotland, albeit that there has been no national publicity. We are looking at doing something with this year's canvass so that the awareness is raised in Scotland going forward, but at the moment it is a watching brief for us.



**Nadia Whittome:** Amanda, do you have anything to add?

**Amanda Edwards:** Likewise, we do not have elections in Wales this year, so we will be looking to our colleagues in England in May for what came out of those elections. Personally I do not think we will know what will hit us with regard to volumes until we have a parliamentary election. Our concern is how we will cope with those volumes for a national election, but certainly we will look to what happens in May with our English colleagues.

**Peter Stanyon:** Can I add something that I think is worth flagging? About 56% of authorities in England have elections. I think it is testament to the electoral community, not just administrators but across the whole community. There is an awful lot of interest from the authorities that do not have elections and want to understand what the implications will be. Certainly Scottish and Welsh colleagues are crossing the border to see what the impact is, because the first time that may hit them is at a parliamentary election. That applies to authorities in England as well who do not have elections this time around. The good practice that will roll out from 5 May onwards will have to be learned very quickly, because the next time it could be used might be at the big one.

Q98 **Nadia Whittome:** Peter, touching on something you said previously about publicity around this, do you think that enough is being done by the Government to inform voters of the new requirement to have voter ID?

**Peter Stanyon:** I think it is fair to say this is where the differential between the Government and the Electoral Commission comes to the fore; whether it is right for Government to advertise the change is debatable, compared to the fact that that is the commission's role. Has the commission done enough? I think the messaging is out there but it can only be done nationally in a very generic nature. A lot of responsibility also then rests with individual returning officers and their local authorities to target within their own individual patches.

The big difficulty has been that although this is the law with effect from 4 May for elections, 40% of authorities, Scotland, Wales, London, do not have elections this year, so it is a difficult message to get across in that way. Has enough been done? I am afraid I will refer to my previous answer: 4 May will tell.

Q99 **Ian Byrne:** Is there a concern that there will be political disengagement from this with the barriers that are put in place, if we have huge swathes of the population—many of whom don't normally vote at council elections anyway—who now feel, "It's just another barrier so why bother?"? It is hugely important we don't have that, so what happens if we do have that?

**Peter Stanyon:** It is difficult to answer, because the we do not know whether there will be that disengagement.



**Ian Byrne:** Yes, but potentially that is a scenario.

**Peter Stanyon:** I can only answer from an administrative perspective: every person who walks through that door—if they do not have the correct ID or they have not come with ID at all—will be given the correct information of what is required now. That will be quite a testing thing for staff and that is where a lot of training is going on with de-escalating situations. I cannot really say whether that will have an effect on the number of votes cast, the way the votes are cast, the engagement and so on, other than the fact that every single person coming along will be given the correct information to allow them to cast a ballot. It then becomes a different debate on whether it is a good thing, a bad thing, an indifferent thing as it works through.

Q100 **Chair:** On that very point, will a record be kept of how many people are turned away because they do not have ID?

**Peter Stanyon:** Yes. One of the issues at the moment to be confirmed is what information can be released quickly at a local level. We are just waiting for some guidance on that, but one of the requirements is that everybody who is turned away is recorded on a ballot paper refusal list. That is reported back to the Secretary of State and the Electoral Commission.

Q101 **Chair:** There is some talk that in some polling stations where it is going to be very busy that there will be people outside the polling stations talking to people who may come about having ID, and that if people don't have it there, they may not then have their presence recorded.

**Peter Stanyon:** The commission has responsibility for this reporting. It will be doing the reports post election. The returning officers are required where they have a meeter-greeter to report those they have advised at the door and turned away, and those at the desk as well. They will be reported as two separate things. The challenge will come with—accuracy is probably the wrong word, but there could be situations where you have a meeter and greeter on duty from 5 pm to 9 pm, and not the whole day. Will that skew figures in the stats coming back in, but it will be recorded where there is a meeter and greeter, and it will be recorded at the desk regardless.

Q102 **Nadia Whittome:** If there is no requirement to have a meeter and greeter, it will undoubtedly skew the results if some polling stations have them between some hours but not other hours and others don't. How will that set of results be accurate? I do not see how it will be.

**Peter Stanyon:** The base standard is it is at the desk, because that is where the ballot papers will be and that is where the question is asked. Where there is a meeter-greeter, the commission is asking for that statistic and the Government are asking for that statistic as well. How that will be reported is really down to the commission and the Government, but it will depend on local authorities—individual returning officers—and how they manage that part of the process. That will vary



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depending on the availability of staff, the demographic in the area, the number of voters going through the door, the size of the station and things like that, which means there will not be 100% consistency of approach to a polling station, effectively. Sorry, I don't know if that answers your question.

Q103 **Nadia Whittome:** That is really worrying for local authorities that have had their budgets cut over the last decade or so, which is pretty much all local authorities.

**Peter Stanyon:** I think part of the issue is about the availability of skilled staff to be able to do the job in some areas as well.

Q104 **Nadia Whittome:** Yes, of course, but local authorities that have had their budgets cut will not have the availability of skilled staff because there are staff shortages across the public sector.

**Peter Stanyon:** The Government have committed to funding for an additional member of staff at every single polling station. In theory, that could be the meeter-greeter. It could be a poll clerk—whatever the case may be. That can be claimed back from central Government by returning officers who have the right to use that money as they wish.

One of the key points is that the returning officer acts entirely independently of the local authority, so it is not just council staff who will be working in polling stations. It will be volunteers, people who have previously worked—retired people, for example. The challenge will come from what stress the additional complexity being brought into polling stations brings to the staff who have done it for a number of years. They have to ask a difficult question; they may have to turn someone away.

This is just the first phase because we have additional staff coming in next year with the phase 2 Elections Act principles. Will some of those staff say, "I have had enough; I am walking away" if there is an argument? They are not the best paid individuals for these jobs, when it is a very important job.

Q105 **Mary Robinson:** It is not just about the numbers of people who would be turned away. It is important that we have that information, but it is also about the accuracy. Will the person turned away be recorded against the name of the person on the register?

**Peter Stanyon:** It will be recorded not against their name but against the elector number for that individual if they return later on with appropriate ID. That information will not be made publicly available because that would breach secrecy of the ballot. Ultimately it will be raw figures that are provided: x numbers were turned away and x came back later in the day. On the voter authority certificate, there is a whole list of categories that will be reported on by the staff in the polling station.

Q106 **Mary Robinson:** It would not be recorded in the marked register?



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**Peter Stanyon:** No, it isn't. That will not change. It will be simply that someone has voted.

Q107 **Mary Robinson:** Is there a missed opportunity? Surely if a person is turned away for lack of having the appropriate ID, if it was recorded next to that ID number on the register or in another way, there is a great opportunity for a follow-up by the local authority to ensure that next time round they have the information at hand.

**Peter Stanyon:** I am not sure I am in a position to say whether that is a good thing or not. There were certainly debates around that but ultimately the policy was determined that there would be separate sheets of paper to be kept secret and the register of electors—the marked register—would stay as it was. I think it is fair to say that there could be different arguments for and against each of the various methods that were considered.

Q108 **Mary Robinson:** But none of those methods allow for a potential voter to be followed up afterwards to help them next time round?

**Peter Stanyon:** To be honest with you, I am not 100% certain because of the complexity of what we are expecting to have to report on, so I would not want to give you a wrong answer. I can certainly follow that up after the meeting.

Q109 **Chair:** Whose decision was it not to record people who turn up and then are sent away?

**Peter Stanyon:** Ultimately I believe it was consultation between DLUHC officials and the Electoral Commission on the ability to record the information in the most appropriate way, but again I do not want to hand on heart say who that fell down to ultimately.

Q110 **Kate Hollern:** To follow on from that, do you think that decision was made because of the concern of the shortage of resources on election day?

**Peter Stanyon:** I would say it is more on the lines of the determination of what would be useful data, what would be appropriate that would not affect the secrecy of the ballot, and ultimately what it is possible for the staff to do face to face with the elector at the time. They still have an election to run. This is just part of that election, so if you have a situation where you are having to record—I think the information has been scaled back on what could be asked but that is partly because you could be asking lots of questions of voters walking through the door—that would then ultimately affect the actual election with delivery of efficiencies and things. A number of factors will come into that one.

**Kate Hollern:** It appears to be the recognition of lack of resources because even if you have got the meet and greet, the people the ballot papers have already got an additional function—checking the ID. It would be useful to have the information of how many people have not prepared



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and do not have the relevant ID, and to follow that up, because there is a real danger that we will actually discourage people from voting.

**Chair:** Nadia, back to you. A little detour there.

Q111 **Nadia Whittome:** Those were very good questions. On Scotland and Wales specifically—for Amanda and Pete—what do you think the introduction of voter ID for general elections will mean for voters in Scotland and Wales, where voter ID will be compulsory in parliamentary elections but not in council elections?

**Amanda Edwards:** It is down to messaging. There will be a package of training for all our polling station staff and, like we have said, that information will be recorded by us. Again it comes down to education. In Wales many of our polling stations have a presence by candidates and their tellers outside on the highway of a polling station, which is outside our jurisdiction, and they could very well be saying to somebody as they are walking in, “Have you got your ID? Have you got your driving licence?” If they say no, they will just turn away.

There needs to be an element of education for the candidates and tellers as well. It is our job to record that information but it comes down to comms—getting those messages clearly out to people and changing the message as you are leading up to an election. If you are on your way to work: “Don’t forget your ID if you are going in to vote in the polling station”. That is essential: tell them, tell them again and tell them again.

Q112 **Nadia Whittome:** What my question did not make clear, but what I can imagine would be particularly confusing, is needing ID to vote in a general election but not in a parliamentary election in Scotland or Wales.

**Amanda Edwards:** Sorry, that is one of the divergence issues that we are faced with and there is a challenge, certainly.

**Pete Wildman:** I should be clear that in Scotland the registration function is separate from the returning officer function, so I am not involved in running polling stations. I am doing the registration, but your point is an interesting one and a good one. It is exactly what Amanda said. It is around communications. In many ways for the Scottish local and Scottish parliamentary elections in 2026-27, in the schedule for the elections most households get a household leaflet. We will be able to get far more information out to them and have plenty of time to make sure that they are aware that they won’t need it at the Scottish locals and Scottish parliamentary.

The challenge will be the UK general, particularly if it is a snap election or if it is quick. The Electoral Commission has said that it will run its campaign that you are very familiar with in England, but that is something where we are going to have to up our game on and make sure that there is a concerted drive across Scotland to ensure that the message is out there: you do need ID and you do need it for that poll.





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People are used to there being different rules at different elections and obviously the Gould report in Scotland highlighted that it is best not to have these elections on the same day to avoid voter confusion. I know the SAA would always be in favour of not having a UK election on the same day as the Scottish election to avoid any confusion.

**Q113 Nadia Whittome:** Thank you. A final question from me: what do you think needs to be considered as part of the Government's independent review of the local elections in May? For example, do you think that that review should be looking at monitoring and the figures of people who were turned away from voting?

**Peter Stanyon:** Without going into specifics, I would suggest that it needs to make sure what the effects were of these changes on the standard voting process for the voter and for those who deliver the elections as well. I made the point earlier that the phase 2 stuff is still to come, which is another layer being brought on in terms of having postal ballot papers, overseas electors and franchise changes. Whatever review is there is to try to understand what the impact was of voter ID on the safe delivery of what is a tried and tested system in that way.

It is about understanding the statistics and about understanding what the process changes are, about understanding people being turned away or people being inadvertently allowed in when they did not have ID, for example. We just do not know until we have been through that part of the process. It is about looking at things in the round to try to understand that part of the process.

**Nadia Whittome:** Amanda or Pete, do you have anything to add?

**Amanda Edwards:** It is what Peter said. It is the first time that this will be introduced, so I am sure that there will be lessons learnt and good practice as well. We are fortunate in Wales that we have just 22 authorities and we will ensure that any messaging that we get out is consistent across all 22 authorities. Yes, it is definitely a learning curve now in May.

**Q114 Paul Holmes:** What is your assessment of how the online voter authority certificate system has operated, both for local authorities processing the applications and for voters applying? Has it placed any additional demands on electoral staff?

**Pete Wildman:** In Scotland at the moment the numbers are low. Interestingly, it has allowed a certain degree of trying to ensure a consistency of approach and a degree of discussion as to how to deal with it. For us at the moment it is still very low level. Colleagues in England are leading the way here and it will be interesting to see how that develops for them, particularly as we get closer to the deadline of six days before the poll.

**Q115 Paul Holmes:** Thank you. Peter, concerning England, in addition to that question, are you receiving feedback of generally how many people are



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applying for them? For example, in Eastleigh I had a meeting with my ERO last week and there were about 45, partly because we have high postal vote numbers. What trends are you seeing?

**Peter Stanyon:** Unfortunately, the portal itself does not provide that reporting functionality, which is disappointing. Any records that are being held will be outside the system. They will be a tick-box record. We do not know that league table. It is possible from the centre to get that; we do not have access to that, although we do know the overall figures because it is on the Government website.

To answer your question, from an elector's perspective the system is as good as it could be, from what we can make out. Amanda made the point earlier about the gov.uk that it is recognisable, it is a straightforward process to go through. That said, the other side of it for the administrator is far from perfect. There is a lot of functionality that isn't there yet. It will be updated. There was a patch done last week, on Thursday or Friday, and the system basically crashed, which was not ideal for those who were dealing with it at this stage. That happens but it should not happen this close to an election.

In terms of the system itself, yes, it is working. It is being made to work on the back office side. There are some disjointed communications on what is acceptable as a photo and what is not acceptable as a photo, which seems now to have begun to level out. Forgive me for mentioning phase 2 again. These issues with the online issue, we cannot see them happen again on the online absent voting system, because ultimately that is a far greater chance of risk to the system as we get closer. However, after a longwinded answer, it is working as well as it can be. For the elector it is superb. The other side of it—seven out of 10.

Q116 **Paul Holmes:** Thank you. It was not long-winded. You are the only one going through this at the moment so it is handy to know what is going on in this case. Amanda, do you have anything to add? I know it is all a bit down the line.

**Amanda Edwards:** Yes, we have had small numbers in Wales because obviously we have no elections. For us as an administrator to process the application, it is pretty straightforward and it is manageable at the moment. We have rejected a few because their photograph has not reached the specification. Again, that is an easy process to go back to the elector on. We have had one or two who have applied who are already in receipt of a postal vote, so they do not need to have a voter ID. However, at present it is all manageable for us in Wales.

Q117 **Paul Holmes:** Do you expect the requirement for voter ID to increase the number of people applying for postal votes? I know that you might not be able to answer that because we cannot predict human behaviour. Particularly for you, Peter, are you seeing that at the moment from your members?



**Peter Stanyon:** Anecdotal is all I can do, in terms of feedback that we have had from across the country. In certain areas there have been noticeable increases, but we think that that is being led more by political parties locally, suggesting that if you do not want the ID— Whether that would be across the board at a general election is difficult to say. Traditionally the postal vote figures have been 15% and 20% of an area.

It will be interesting to see, when the deadline for applications happens—which is 5 pm tomorrow for the May elections—what those figures look like at that stage. There have been spikes in certain areas directly because of local communications by parties saying that if you vote by post, you do not need to.

**Paul Holmes:** I know that that is true because in my area all three parties are saying, “If you do not want to take your voter ID down, get a postal vote”.

I was not going to ask the other two witnesses that question because you have only had minor numbers because of elections, but is there anything that you want to add to that, Pete or Amanda?

**Pete Wildman:** No, I don’t think so.

**Amanda Edwards:** No, there is not enough to recognise a spike of any sort. In every election postal votes are growing anyway.

Q118 **Paul Holmes:** Thank you very much. The next bit I want to ask about is anonymous voters who wish to conceal their identity. They are now required to apply for an anonymous elector’s document that includes a photograph, as you will know. How many people have applied for an AED and what proportion of people registered anonymously is that? Do you have any concerns about the registration of anonymous voters?

**Peter Stanyon:** I do not have any statistics to be able to give you as to the take-up. There was a requirement for EROs to contact every anonymous elector in their area in mid-March. That was one of the functionality pieces that was not there to assist them with the portal.

In terms of the process, it should be reasonably straightforward. In fact, probably for anonymous electors it is slightly easier because there will be a fresh certificate issued every single year because of the nature of the elector number changing. The fact that you have to take your poll card and your AED with you should be a reasonably straightforward process for the limited number of people who currently have anonymous registration.

Q119 **Paul Holmes:** You do not have the figures but do you have any concerns? I know that you said that it should be pretty straightforward, but in your role do you have any concerns?

**Peter Stanyon:** Nothing has been reported as being of any great concern. The figures that we are talking about are handfuls in local



authority areas. There is one local authority that has 600 to 800, which will be a bigger issue to deal with, but generally speaking it is able to be coped with at the moment.

**Paul Holmes:** Pete and Amanda, I know that you have smaller numbers. Is there anything that you want to add to what Pete has said?

**Pete Wildman:** No, I would agree with the numbers. In my own area I have an electorate of about 230,000 and we have only three people who we have had to write out to. If they run into any difficulties, there is more than enough support to help them through the process.

**Amanda Edwards:** We just have five on our records in Carmarthenshire and two of those have a postal vote, so it is all manageable at present.

Q120 **Mrs Elphicke:** Clearly it has been an online system and I have had some concerns raised with me about older voters, particularly those who are of an age and particularly rural older voters. I am mindful of the comment about that photo not being good enough and having to be redone. People might live by themselves and may not have mobile accessibility or they might have digital exclusion issues, particularly around older age. Is that anything you are assessing or that you have any concerns about?

**Pete Wildman:** We have made arrangements that if somebody wanted to apply in person our staff in the office would deal with it. We would look very carefully, if somebody had access issues, at what ways we could assist them. However, as I said before, it is such an early stage for us in Scotland that it is hard to know what is capable in a large-scale operation. Certainly in-person applications are possible and applications by post are possible as well.

**Peter Stanyon:** Anecdotally, people are learning as they are going. The key point is that there is an expectation that registration officers will have the ability to do that, either at their offices or at other locations. We are aware of some local authorities where EROs are doing it at libraries and community centres on a rolling basis to assist in those circumstances. At the moment it comes down to having to adapt as people begin to learn how the system works. We are not aware of there being any major issues reported of people unable to access the system because of that—that does not mean that there is not—because of some of the good work being done to provide easier access through the offices of the registration officer.

**Chair:** Moving on to other issues in the 2022 Elections Act—Kate.

Q121 **Kate Hollern:** There are a number of serious challenges coming rapidly, with less than a month to go. Do you think that the system should have been better planned over a longer period to enable electoral registration officers to gear up for such drastic changes?

**Peter Stanyon:** Pete mentioned the Gould report previously. That report mentioned that there should be no change to systems six months out



from an election. That was four months out when the voter ID came in, so it is a very constricted timescale. Should there be a longer time? Yes, we would always ask for a longer time. The major challenge coming with the remainder of the Elections Act provisions is—as has been stated—it will be delivered within this Parliament. There are some pretty hefty things still to come, arguably more technically challenging for administrators than voter ID or the accessibility provisions, because you are dealing with the back office. It may not be so much front office, if that is the best way of describing it.

Yes, we would have loved to have seen a much longer system. We would love to see the whole system reviewed from the bottom up. That is something that the AEA and others have talked about, and the Law Commission's report—about simplifying the processes. We do have an 1800s system with things being grafted on top of that. It is still working. It is being held together with gaffer tape in places. Because of that you need longer to see what effect these changes will have, not here but over here. That is the knock-on effect that we are worried about. Therefore, yes is the answer.

**Q122 Kate Hollern:** I do understand that you do not have elections in Wales or Scotland, but this must be a real opportunity for both of you to learn by the obvious mistakes that are coming.

**Pete Wildman:** It is probably trying to learn from good practice, particularly for things like communications, what works and what does not and what is an effective communication tool to get the message out around voter ID. We are looking in Scotland at some of the challenges coming around the divergence in approach over postal and proxy voting, and that will probably be quite a hard message to get across to the electorate in Scotland—that they may need to do different processes to achieve the same objective for different elections. That is something that we will keep an eye on.

**Kate Hollern:** Amanda, do you have anything to add?

**Amanda Edwards:** No, it is the same as Pete. As I have already said, we are only 22 authorities in Wales and we have quite a close network. We are all of the same opinion that we want to sing the same hymn. Any messaging will be cascaded from one authority to the next. We would be looking to England for better practice and at how messaging worked on a local basis. Lots of authorities are doing videos to cascade the information to various sectors of the electors, including the disability sector. We would be looking at all that and hopefully producing maybe one video in Wales rather than each authority doing its own thing, so that we are all singing the same message. That is the key for us.

**Q123 Kate Hollern:** Obviously there have been some impact assessments on the Elections Act, such as the changes to eligibility for expats. That is estimated to result in 3 million extra voters being added to the register. That is a huge challenge for electoral registration officers because not



every authority will have 15 years' worth of records, which made it more difficult at the time. How can local authorities cope with such a huge burden without additional resources? I know you mentioned that there was one extra. I do not think that that is anywhere sufficient, given the responsibility. Moving back to the back office, you have people trying to register people. How is this going to be resourced? Has anyone asked how it is going to be resourced?

**Peter Stanyon:** The difficulty is that we do not yet know what the detail is in those areas. Taking the overseas electors changes, it will not be 15 years' worth of registers; it will be in perpetuity. There are benefits now being introduced by software systems but it will still be paper-based in some areas.

From the very high-level parts of the Act, it is the sort of thing where it will be about checking the register, then checking documentary proof and then attestation. You have to go in that order. You cannot take the attestation first. Until we know and see the detail of that secondary legislation and what the workflows will be, it is almost impossible to understand what the implications will be on Amanda and Pete's officers, other than the fact that I am pretty certain—I am not a betting man and I proved that on Saturday at the national—that there will be a spike of registrations ahead of the next general election, because there always is. Regardless of there being a three-year length of application being brought in, and regardless of there being a November refresh period, there will be a spike of applications coming in and we do not know what that will be. The devil is in the detail.

Q124 **Kate Hollern:** A report that when to the Lords Committee stated that the workload for expat voters was 25% greater than your regular voters. There must be serious concerns with local authorities up and down the country on the accuracy, the actual checking of that and the resources, given everything else that has been added on.

**Pete Wildman:** It is definitely a slower process than registering an ordinary elector because you have to track that. As Peter said, the more recent registers are all digitised and therefore it is a relatively quick digital check. When you get to the older registers, you can imagine the polling districts change and constituencies change. Tracking an address back can be a slower process. I do not think that any of us know the numbers that will apply. Although you have an idea of the number away from the country, how many then seek to register is a bit of an unknown, but it is definitely a slow process.

The residency one is probably more of an unknown. At the moment it is binary. You are either on the electoral register or you are not. You then get down to whether the documentary evidence is sufficient and whether the ERO is satisfied. That is open to another discussion, which I think will be an interesting one, to see how that develops and how many rely on residency rather than the registration qualification.





**Kate Hollern:** Amanda, do you have anything to add?

**Amanda Edwards:** It is unknown at the moment. We have not seen the finer detail regarding the actual registration process. As Peter said earlier, we will get through that election. We have had tremendous challenges in the past. We have had winter elections; we have had six weeks to run parliamentary elections. Administrators literally live at work. We will be there until 1 am or 2 am to get the work done. We know that we will get there, but there are pressures. There are certainly staffing resources as teams are getting smaller. It is about having that engagement with your returning officer, and getting that support internally and externally—and hopefully it will be supported with additional monetary resources.

Q125 **Kate Hollern:** On that point, are there currently problems with election funds and is Government funding adequate to cover all additional costs relating to the implementation of the Elections Act? Are they giving you enough money and resources?

**Amanda Edwards:** There has been money made available. Again, there is a different source of money in England because they do have elections in May. However, there is a facility to apply for additional money if you have had additional expenses that are necessary. There is a means of applying for more. Peter can elaborate more on that because it does not apply to us for May.

**Peter Stanyon:** All I would add to what Amanda has said there is that the world of election finance is a murky world. There is the differentiation between electoral registration new burdens funding, which has been provided to a degree, and also elections funding. There are often grey areas.

It is fair to say that you do not just ask for money to throw money at it. That will not resolve it. It needs to be the correct type of resource that is needed. Hence the early questions about data sharing and things like that will make it far more efficient a process than just throwing money in those areas. The crucial bit is that these May elections will confirm whether the levels that have been initially given are in the right ballpark figure for the rest of the UK when it comes to elections next year.

It is also the ongoing funding. We will talk about 4 May, we will talk about the general election, we will talk about 5 May next year, or 3 May, whichever way it goes. The point is that there are elections taking place every Thursday all the way through the year and it is that ongoing resource that is often the challenge, not the big spiky ones that we are talking about.

Q126 **Kate Hollern:** A report said, "Under current arrangements the costs of these must be met by the ERO and their local authority. They are not funded by central Government through election refunds. We believe central Government funding should cover additional registration costs which occur as the direct result of a national poll". These local elections



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will be a trial but you are going to get a huge increase of workload when it comes to the general. You have higher turnouts, higher registration and higher applications. How are local authorities going to plan without any idea of the cost? Are they then going to have to reapply for additional funding? Are we just throwing too many problems at electoral registration officers at the same time?

**Peter Stanyon:** There is an awful lot to take on board. Amanda made the point that it will be delivered. A very good example I can give you with electoral registration is that for overseas electors—tranche 2—there may be some new burdens funding coming. I do not know, but ultimately you are going to get overseas electors at a parliamentary election and it has nothing to do with the local government, but the local authority is required to fund the registration of those electors.

To take it even more granular than that, a one-off postal voting application for a parliamentary election has nothing to do with the local authority, in that it will not be voting at that election, but the local authority must pick up the costs of those applications and they are higher at parliamentary elections for all these reasons and so on. Therefore, it is not a new issue but the key point to it is that this issue could grow more and more.

**Pete Wildman:** I agree entirely with you about one-off postal votes for a particular election. People apply just for a general election postal vote. That piece of work is generated entirely because of the election and would not have happened otherwise, but that is not funded through the elections funding because it is a registration activity and, therefore, is just funded through the local authority as part of registration officer funding, albeit that it is directly related to an election.

**Peter Stanyon:** When it comes to planning, which was your second point, the question is very difficult. As I say, it is a murky world in terms of elections finance. A constant battle—which I think is a fair word to use—will be where staff and resources are needed to deal with applications to register because of the election. You cannot claim those back, so you have to differentiate between the work that you are doing on the election and the work that you are doing on electoral registration for that claim to come in. It is a very complicated process that does not stop on polling day. We are talking potentially a year and a half or two years down the line when the funds are given back to the local authority by central Government.

Q127 **Kate Hollern:** Of course, to plan and resource properly you need clearer guidelines on what is going to happen, rather than, “We’ll do this little bit this year and another bit next year”. It is going to be a huge burden on local authorities, isn’t it?

**Peter Stanyon:** Potentially a huge burden. It goes back to the earlier point that I made—that the devil will be in the detail as to what the implications will be. We do not know that at this particular stage because



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we have not seen secondary legislation. We have not seen the commission's guidance and how it will be rolled out from that point forwards.

**Q128 Kate Hollern:** Should we be pre-planning for some sort of mechanism, so that local authorities are compensated adequately so that they have a rough idea of what is coming? That will help with planning for staff.

**Peter Stanyon:** I think that that will come once the detail of the devil is known, if that is the best way of describing it. I can then absolutely assure you that plans are already in place for the expected additional burdens in almost every single local authority, because we are already planning for the parliamentary election.

No one knows what day that will be because now that the Fixed-terms Parliament Act has been taken off the statute book, it will come within six weeks. That is a very short period in which to turn that around. Although that is a woolly estimate of time and resource, you would expect that all of the implications of the changes are being factored in to make sure that when it comes to it they are not starting from a standing start, but are already some way down the line.

**Q129 Paul Holmes:** I want to ask a quick question, which is slightly outside the purview of what we have been asking today but is a potential burden in the future, which is on the parliamentary boundary changes. There are a number of cases where seats that may be under the purview of one local authority officer may now be under the purview of two or three or even four. In my neck of the woods there is the case in one of the seats, which used to be mine and will now be Test Valley, Winchester, Eastleigh and somewhere else that I can't remember at the moment.

With the Electoral Commission not deciding at the moment which of those authorities—not only in Hampshire but across the country—will be in charge of the count and the accounting procedures at the general election, are you getting EROs and members coming to you to say that they are getting concerned about the resourcing and preparation time for the parliamentary boundary changes that will come in for a general election next year?

**Peter Stanyon:** Yes, it will not be the Electoral Commission making that decision. It is Government that make that decision. Parliament makes that decision because, ultimately, it is an order that is laid to say that you are the returning officer for that area.

There has been concern bubbling for a long while. Where we have got to—and I will give credit to the Electoral Commission as well on this—in terms of preparatory work for those changes is that there will be cross-boundaries and there will be new arrangements. It has massive effects on things like the management software systems, and how there are differences of approach in different local authorities. They will all be ironed out.



The general arrangements are sort of known. They have not been presented as a final report yet, but there are unlikely to be significant changes to what the commissioners have proposed. The work is beginning on what they will look like but you are held up by the fact that, first, the commissioners need to report formally, and it is now down to Parliament to approve; and, secondly, the second order needs to come, which will be, "Now these are the returning officers who have authority and who will have the jurisdiction in those particular areas". It is not perfect but a lot of work has been going on behind the scenes to make sure that it is as simple as possible, albeit you are still waiting for the tick boxes to come to confirm what it will be.

**Q130 Paul Holmes:** It is not leaving you enough time. There is a unique situation in a certain number of parliamentary seats that may be changing. Could that be a criteria for additional burden funding or would it be too minor an issue for some authorities to ask for that?

**Peter Stanyon:** I would be surprised if there was any additional new burden funding coming. It is almost spinning it around the other way: is it manageable? It is manageable if there is enough time for the arrangements to be put in place. If the order comes in in July and the returning officer is notified by October, if a snap election is called in October that would be a lot of challenge for the administration, as it would be for the candidates.

If it were to be May, or even as late as January 2025, there would be the ability for the changes to be bedded in at that stage. We are ultimately in the hands of the Prime Minister as to when the date will be called. A short, sharp impact will be more challenging than something with a longer lead-in.

**Chair:** Thank you, all three of you, for giving evidence to us on a wide range of issues, particularly around registration. We also discussed voter ID and other important matters that will affect the public quite widely in the next few weeks. Thank you very much indeed.

## Examination of witnesses

Witnesses: Fazilet Hadi, Sila Ugurlu and Fiona Weir.

**Chair:** We will begin the second session; thank you all for coming. I will go down the table and ask each of you to introduce yourself and just say the organisation that you are representing.

**Fazilet Hadi:** Thank you. I am head of policy, Disability Rights UK.

**Fiona Weir:** I am the Chief Executive of Joseph Rowntree Reform Trust

**Sila Ugurlu:** I am Trustee at the British Youth Council.



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**Chair:** Thank you all for coming. We will begin our first questions to this panel with Ian Byrne.

Q131 **Ian Byrne:** This is on barriers to registration. The Government said they do “not believe there are material barriers for potential voters to register”. Do you agree?

**Fiona Weir:** I disagree very strongly with that one. We have millions missing from the register. It is nearly one in five of eligible voters. It fundamentally undermines one of the foundations of democracy. The numbers have stayed stubbornly high for years despite attempts of reform by successive Governments, despite very hardworking EROs. When your electoral system is not working on this kind of scale, not just the numbers but particular demographics—young people, renters, black and minority ethnic people—who are particularly excluded, there comes a point where you have to stand back and ask: will another round of improvements do the job?

One of the previous speakers talked a bit about gaffer tape. We have a Victorian system that is creaking and leaking. Our fundamental argument would be that it is time to join the half of the world’s democracies that have already taken some form of step in this direction, and move to a system of automated or fully automatic registration. The fundamental problem that we have at the moment is that we are asking citizens to register. That is a big behavioural thing to ask millions and millions of people to do. We do not need to. They have to make the effort to vote and think about it and do it. Why do we need to make them register as well, when we can have a system that automatically registers the population? All it is is an index of who is there.

That is why we would make the case for fundamental reform. We are in the fortunate position that there are now so many countries operating so many different systems that it is not about thinking of something theoretical. There is a lot that we already know about how the different systems work. When we commissioned Toby James to do some research into these systems, we explicitly asked him to look at all the tough stuff, like cyber-security, data protection, privacy, opt-ins and opt-outs because we knew that any Government and any parliamentary Committees grappling with it would want to think through some of those important, thorny issues.

The research report that he produced alongside Paul Bernal—a data protection expert—very much addresses a lot of those problems. It shows that there is now extensive practice that we can study and look at. We are delighted that the Welsh Government are starting to look at AVR as part of their current consultation process. We know that it is one of the most popular measures.

The Electoral Commission’s tracker surveys show time and again that automatic registration comes top of how voters would like to see the system improved, followed pretty quickly by the ability to check online



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whether you are registered or not. We spend stupid amounts of effort trying to find out about duplicates at the moment. It is a waste of everybody's time and effort. The third most popular choice is around some kind of automatic updating when you move house so that you do not have to do that.

That is very much where the public are. It would be a very popular move. What I know is always music to the ears of parliamentarians is that the international experience is pretty positive on the cost effectiveness of these measures. If you look at the Brennan research institute, lots of US states advertise very strongly the millions of dollars that they save taxpayers by going down this route. The Welsh Government's assessments are very sensible indeed. They are not big sums of money and they have not even costed in the benefits of the system. That is what we would put on the table as the overarching suggestion as to what we need to do to deal with the scale of the problem.

Q132 **Ian Byrne:** Thanks for that, Fiona. That is pretty comprehensive and no sitting on the fence. That is what we like from a witness.

Fazilet, I want talk about what barriers exist that results in some groups being typically less likely to be registered. Can you outline that?

**Fazilet Hadi:** You have been talking for an hour and half now and the word "disability" was mentioned once. There are 14 million disabled people in this country, and some of us do have real problems in exercising our democratic right. That is the other thing that I want to draw attention to. We can have the best administration in the world but that does not give some of us the right to exercise our vote, because other things need to be put in place.

There are some disabled groups who are going to be particularly affected—people with sight loss, people with learning disabilities, people living with dementia, and I am sure there are others. For us, it is not that simple as going online, ticking boxes, getting photographs taken or going to gov.uk. There is digital exclusion. There are problems in using some of those processes that for non-disabled people are simple. At the moment, we have a one-size-fits-all process that some of the population find very easy but lots of us find very, very difficult.

The Equality Act was completely missing from the last one and a half hours. The fact that there is a public sector equality duty—that there is an anticipatory duty to promote equality for disabled people, for older people, for other protected characteristics, and that there is a duty to make reasonable adjustments to processes—was not mentioned at all. Some of the barriers are that information and communication are not accessible. It is not in a range of formats; it is either digital or paper-based. It is not using enough channels, whether that is telephone or audio or braille or easy read.





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There is no sense of that variety of communication. There is no real sense of money on outreach. You need to go to people with learning disabilities. You need to go to people with dementia and you might need to visit residential homes. People are not going to just be able to click on a button online.

There is no sense of any recording of our communication needs, so—guess what?—my bank knows that I am blind or my utility company knows. Even my local authority knows, because it has given me a registration card, but none of the services, including electoral registration, know my communication needs. For all my life I have received paper-based information from electoral registration, which is completely inaccessible to me. There is no recording processes, whether it is the online processes, paper-based processes or going to my polling station. The accessibility in all these spheres is not good enough. It cannot be relied on by disabled voters.

Finally, I would say that there is a barrier in terms of the human support that some of us need. Whether that is delivered by people sitting in electoral registration offices or whether that is upskilling social workers or care workers, there are lots of ways of doing that, but that is completely missing as well. Those are some of the barriers that probably mean that millions of disabled people will not vote. Photo ID we will come on to later, I hope, but that is yet another one.

**Q133 Ian Byrne:** Has there been any dialogue with the people responsible from Government?

**Fazilet Hadi:** We made representations when the Elections Bill was going through but, as you will see, I don't think that those were heard.

In terms of co-production and consultation locally with disabled people groups, I felt from the session that you have just heard that outreach and discussion is quite low on the list, whereas administrative efficiency is much, much higher. That is not a criticism of them, because they may not be funded to do that outreach, communication and consultation, but it is lacking.

**Q134 Ian Byrne:** I am interested in the numbers you talked about. You said it is potentially millions who will be denied the opportunity.

**Fazilet Hadi:** There are a couple of million people with sight loss. Some are blind, some are partially sighted. There are 1.5 million people with learning disabilities and 800,000 people with dementia. There are people out there and it was clear to me that their voices are not being heard loudly enough.

**Q135 Ian Byrne:** Sila, do you want to add anything with regards to what barriers exist that result in some groups being significantly less likely to be registered?



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**Sila Ugurlu:** Yes. Many jump to the conclusion that it is because young people are not interested in politics. That is completely false. Young people do not vote, in general, when you look at the general population, but they engage with politics in many other ways. There are studies about young people in Britain, but in France and Germany as well—to name a couple—that young people are more likely to sign petitions and more than twice as likely as older people to participate in demonstrations. This shows a group of people who are engaged in politics, who are invested in the health services, climate, workspaces and education.

What is the problem? What is the disconnect here? They are not being welcomed in these spaces. They are not being encouraged to vote. I can go on and on about opportunity cost. Young people are not educated about how to vote and where their local polling stations are and how to register. There are so many hoops and jumps that they have to go through just to be able to get to the same place as someone who has been voting for 20 years.

Our education system does not educate young people on their civil rights on how to register if they do have to register and we do not have automatic registration put in place. There are so many systematic barriers. It is not just young people as a massive group. There are groups of marginalised communities within those young people and there are all these overlapping systematic barriers that discourage young people from voting. They have historically not been encouraged to vote. They have been completely disenfranchised by the system. Campaigns are not targeted towards them; policies are not targeted towards them.

They are here too; they are citizens too. We are talking about those below 16 generally because of Scotland and Wales having votes at 16. A simple solution is that these young people need to be engaged from the very beginning: going to secondary schools, talking about policies, talking about manifestos, having conversations with them, engaging with them and hearing their thoughts. They do not bite. It is about engaging them with politics and reminding them that this is a democracy that cares about them and they matter within it and their voice has an impact, not just for signing petitions or going out for demonstrations but also marking an X on that ballot.

It is not a grand ordeal. I know that we do not have elections very often and that it is not an everyday thing, but it should feel as though it is every day. It should feel seamless and it should feel regular, so that they know what to do and they know how to do it and everything is presented to them. It should not be a hassle to be able to vote in a democracy. A democracy relies on everyone in our society being able to participate and share their views.

**Ian Byrne:** Excellent. Fiona?



**Fiona Weir:** Could I come in specifically on young people and a couple of recent important policy developments? First, the Electoral Commission has just published its review of the 2022 canvass. One of the things that it draws out particularly strongly is the continuing decline. It is not as sharp a decline as it was but it is a continuing decline in attainer numbers. It talks about it being exacerbated by the nature of canvass reform and explain why. It says that the number of attainers is not likely to increase significantly. That is why it then goes on to recommend—and we think that this is probably the single thing that you could do most easily and quickly—moving to a system where young people are automatically registered at the same time as they receive their NI numbers. That has been recommended many times by my organisation, first in the 2006 Power inquiry, so we definitely get the tenaciousness award for bringing the issue forward.

The second one I want to focus on is some new research that is about to be published on students that is very worrying. It has surveyed best practice across the university sector and it is widely seen to be that where universities are auto enrolling students, about 23% of universities are currently doing it. At the moment, it looks as if that process may start to go backwards as the Jisc software used by 33 universities and 80 EROs is withdrawn.

There is an urgent need for the Office for Students, the Electoral Commission and the AEA to get together with the universities and collaborate on things like data sharing, and how they can produce guidance on best practice and start to turn this around. We know that there is a lot of appetite in universities because they see this as an important part of the students' civic role. It is timely and incredibly urgent, given the small window between the next set of students enrolling, which will probably be before the next general election. I would urge you to look at that and we will send you the research that Purpose Union is carrying out, when it is ready.

Q136 **Ian Byrne:** Thanks for that. Fazilet, how did the registration rates of the groups you represent compare internationally? You touched on all the issues that you see. Are there any approaches taken in other countries that could be implemented in the UK to support groups that you represent, and disabled elements of society?

**Fazilet Hadi:** I do not know about that, I am afraid. I know that in terms of equality legislation for disabled people, while the Equality Act has its flaws, we are very, very lucky to have it. It should be much more embedded, though, than it is. We have our own good law that needs to be implemented.

Then the point that I made earlier is that we need to think more creatively about how we reach people, how we support people, how we provide different channels. Maybe some people need to be talked through a process, some people need to be supported to fill in the forms. It is not rocket science, but whatever can be digitalised and whatever efficiencies



there are that can be brought through, making the processes simple for those who can manage them.

We also need to spend much more time and effort if voting is seen as our democratic right rather than just a tick-box exercise, and then spend the money to support people—disabled people, older people, digitally excluded people—to get voter registered. I don't have any magic examples, but some things will help some disabled people and not others. Some disabled people do love being online and some don't, but some disabled people definitely need that more personal human support to go through that process.

**Ian Byrne:** Thanks, Fazilet. Sila, would you like to add anything to that—anything internationally that you think could be implemented here?

**Sila Ugurlu:** I would reiterate the automatic registration idea. There are a list of countries that do it. I could read it out, but what a waste of time. They tie it to residency registration, which is an option. There are other options. We mentioned universities and schools, but not all young people are engaged that way. We could also do national insurance numbers; the list goes on and on. There is the DVLA. There are so many options and it works. It is evident that it works. This is not some grand new theory that has partially been tested. There is evidence and it works.

**Chair:** Mary Robinson has a supplementary.

Q137 **Mary Robinson:** This question is for Fazilet. We make decisions based on data and we are able to look at whether people go to vote and whether they are registered and see, for instance, their age and we can make decisions and we can target it in that way. Disability is diverse; it is not one thing. There are a lot of different ways that a person can have a disability, some of which will be difficult enough to prevent them from registering or going out to vote. However, I would be concerned that we do not have the information around that. Would that be correct? If that is correct, are we not capable of making the right judgments about how we do things?

**Fazilet Hadi:** No, we do not have data. Rather than knowing whether someone has an impairment—whether they are blind or have a learning disability or have an energy-limiting condition—what would be more useful is to know what our communication needs are and what access needs we have for aids and equipment so that things can be planned for. If you know what barriers someone faces, that is more important than knowing their condition.

That information would help electoral planning to be more sensitive to voter need. If you know that someone could not access print, for example, or you knew that someone needed easy read, you would be able to provide them with that information or you would be able to provide them with human support, if you knew that your polling stations



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needed so many tactile voting devices or so many booths that were wheelchair level or so many pen grips or whatever it is.

This is not rocket science. As I say, some private sector companies do know the communication needs. Energy companies have come under flak recently for not knowing enough about the disability of their customers and forcing installation of meters, but they are required to hold priority service registers. The system is not working perfectly but there is a system. It is quite surprising that, for something like voting, there is so little information on what citizens need to have their democratic rights met.

Q138 **Mary Robinson:** Thank you. Do we communicate enough and interact enough with the representatives from disability groups and charities in order to bridge this gap?

**Fazilet Hadi:** I would say absolutely not. We need to communicate at national level but also across the local authorities that are implementing it. There are disabled people's organisations and impairment-specific groups. There is no reason why local authorities and those implementing election procedures and processes should not be talking much more to their disabled citizens and building the Equality Act into their planning.

Q139 **Mohammad Yasin:** On engagement and outreach, Fiona, how successful have Government campaigns and local authority outreach activities been, and what methods of engagement are most effective in reaching under-registered groups?

**Fiona Weir:** The first caveat is that there is an extraordinary gap in understanding. Every Voice Matters outlined quite carefully what is known and what isn't. There are sadly more gaps than knowledge in this space, particularly for different black and minority ethnic groups, where there is not very much known, although there is an excellent research report on our website, by Maria Sobolewska, which covers quite a bit of it.

The second thing that I should add as a caveat is that the electoral data landscape is problematic. It makes it extremely difficult to measure and evaluate properly what works. The Joseph Rowntree Reform Trust has put a huge amount of funding into a wide range of civil society interventions to concentrate quite heavily on evidence and learning and understanding what works in this space. Sadly, the days in which the Cabinet Office was funding civil society organisations to do a lot of this seems to be pretty well gone. There is very little in this space.

The reason that that is so problematic is that a lot of people who are not registered are people who do not fully trust the system. They are quite disconnected from democracy. We know that trust is a real problem in most democracies across the world. Therefore, a trusted messenger and organisation that works with that demographic and knows them well, has good outreach and good relations can make an enormous difference.



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The things that we have tried that we know are pretty successful are a mix of online and offline tends to be most successful, integrating the two types of approaches. Ambitious, well-targeted digital ads are particularly good for engaging young people at scale but they are very costly. If you do not have real skills in understanding how to optimise it, you can spend a stupid amount of money very quickly. We tested some work with social media influencers. The data is unclear on that, but we do know that when social media companies push “register to vote” at the top of user feeds it makes a massive difference. We should be encouraging those companies to do it. It is a terrible shame that a public interest organisation like the BBC is not doing non-partisan register to vote. To me, it is pretty basic public education.

Institutions generally, and touchpoints where people come into contact with institutions, can play an important role—universities, FE colleges, churches, mosques and family centres. Migrants Organise, for example, worked closely with the Muslim Council of Britain in 2019 and got a lot of voter registration work going in mosques. It is about trying to encourage as many entities as possible to see this as part of their civic role—that this is what they help people to do. There is enormous space there to build on those kinds of initiatives.

There needs to be quite a lot of work to understand the kind of messaging that works well. For a lot of communities it is important just to ask them to vote, because political parties often don't. It is about understanding identity issues. For example, it helps if you talk about being a voter rather than voting. That helps much more with people. If you talk about a sense of duty, that can be very effective. Interestingly, particularly with south Asian communities it is very high. It is a bit lower with black and Caribbean, but both are significantly higher than white British. It is about understanding in quite some detail what works best for different demographics. That is where funding organisations that know who to work with them becomes quite important.

There is a lot of hesitation across civil society because charities are terribly worried that this might seem political. There is no reason why they should not do non-partisan voter registration as a charity, none at all, but a lot of their boards are nervous of doing so. A simple thing that this Committee could do is to simply encourage civil society to be active in this space and to be confident of doing something in a non-partisan way, because we need to get all these organisations that work with people who are not registered busy and active in this space.

**Mohammad Yasin:** Sila, do you have any view on this?

**Sila Ugurlu:** Adding to that, I talk about, in the long term, educating young people. That can be short term as well. It depends on how you set it up. Short term you could do mobilisation efforts to explain how a ballot works, where your local polling station is—even a map of all the polling stations across the country. It is basic information that once you have





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voted one time you will know off by heart, but, if you have never voted, where do you get this information? You cannot just make it up, especially with the introduction of voter ID, which I am sure we will talk about later anyway.

Educating younger people in the long term will take place in schools with PSHE education. We should be educating them from the beginning of secondary school about not just voting but their other civic rights and duties, making it more commonplace, not exaggerating it to make it such a big, daunting experience but just something that you do after or before work or whatever. It is about getting them used to talking and thinking about it. It is just the education of young people. It is not patronising. In Woking, there was a trial run for voter ID and our young people said that they felt they had nowhere to ask all their silly questions, and they do feel like silly questions when everyone seems to know and you don't. How do they know? Well, they have done it before; that is how.

**Q140** **Mohammad Yasin:** Have you been involved in the campaign to support voter registration? If so, what lessons are there to learn to improve future voter education campaigns?

**Sila Ugurlu:** We are a charity, so obviously apolitical registration comes into it. Currently, we are working with My Life My Say and the NUS, especially today because today is voter registration day. We are working with them to increase registrations, but these kinds of campaigns are very last-minute in their nature so we cannot plan for them throughout the year. We cannot encourage constant voter registration. It is very much about whatever is in the climate, whatever is going on. That is what we do.

We also run campaigns with The Body Shop, and the UN by association, for votes at 16. We believe that this has a direct correlation with increasing the turnout of young people in any kind of election. This has been seen in Scotland and Wales and it is a shame that in Northern Ireland and England, we cannot have the same kind of consistency throughout our country. It is completely unfair that some 16 and 17 year-olds can elect leaders when others cannot, or that in Scotland they cannot elect their Members of Parliament, for example, but these Members of Parliament do represent them.

It is undemocratic to have this kind of imbalance. Votes at 16 also encourages people older than 24 to vote. I know that when we talk about young people, we focus on 18 to 24-year-olds but these young people do grow up and they do leave that group of young people; it is a very rare kind of protected characteristic because people leave it, eventually. Lots of millennials, for example—that generation—are in their 30s now and are supposed to be the homeowner, having children, getting married age group where you would expect a natural progression into a greater voter turnout but we cannot assume this natural progression takes place automatically and it has not done so.



This age range is at its lowest voter turnout ever and these voters are not going to magically wake up when they are 37 and start voting. They are going to turn 65 one day. They will turn 80 one day. What happens to our democracy when these young people grow up and start being the bulk of society but are not voting because they have not been encouraged to vote?

**Q141 Mohammad Yasin:** Fazilet Hadi, are you aware if electoral registration officers are using data from social care colleagues to identify people moving into their areas so they can offer support?

**Fazilet Hadi:** "I am sure they are not", she says bravely. From my knowledge—I am registered blind so the council holds that information about me—that information does not go to the electoral registration officer. It does not go anywhere, I don't think. Knowing I am blind is not enough. You probably have to know whether I use email or audio or Braille or whether I prefer a telephone call. I don't think that is happening.

Also, even though I would very much like to see more connection between departments in local government, I would also like to see more targeted communication with particular communities and disabled communities, that do have barriers—people with learning disabilities, dementia and so on—but there also has to be follow-through. There is no point in giving information about voting unless you are going to make the whole process from beginning to end a pleasurable, easy and accessible one. For some disabled people, it will just be a question of being given information about how to get on the register but for a lot of others who face barriers, we need to see the whole end-to-end process meet our needs.

**Q142 Mrs Elphicke:** Fiona, you said that you thought it was possible to have a citizen role that was not a partisan role. Sila, you mentioned My Life My Say; is that the organisation? I have just gone on to look at that non-partisan, as it calls itself, organisation that has no other parties—I can see a news story—other than one with Labour posters and a picture with Keir Starmer. To what extent do you think the organisation is achieving its objective? Do you think that citizen organisations, as Fiona Weir has described them, can truly be non-partisan or do think you need to recognise that organisations are making a political stand? I think that My Life My Say only has Labour banners on it.

**Sila Ugurlu:** I would be happy to do that. I can only talk about the British Youth Council and what we do with political parties. As an example, I will talk about our honorary presidents. We want one from each major party. We want a Conservative, a Labour and an SNP member. We send out invitations to those we want to nominate and whoever gets back to us, gets back to us. Sometimes it might look like we support a particular party and sometimes, if we have events in Parliament for fundraising or anything like that, we send invitations to



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everyone because that is what we have to do; as a charity, that is our best practice.

However, we cannot force people to engage with us. Whoever engages with us, we invite and welcome to our platform and we hope that more people do. I cannot speak for that charity but for our charity, in those instances, it is because of this: people just do not engage with us, we don't get replies; sometimes schedules are busy. It is just a case of technicality.

**Q143 Mrs Elphicke:** This one certainly seems more than a technicality when you have people holding Labour leaflets, being pictured only with Keir Starmer, and they have a banner talking about 53% of people not trusting politicians before a picture of Keir Starmer. The reason I mention this is that it is an organisation that you are promoting; you have brought our attention to it. What do you think about how organisations might be able to attract people to participate? Should there be some strengthening guidance? What do you suggest, Fiona, so that we do not have a situation like this one where one organisation presenting itself as non-partisan, clearly is not?

**Fiona Weir:** I cannot comment on particular organisations but we fund quite a lot of people in the civil society space through the UK Democracy Fund, which we host and which brings together a mix of funders who are funding non-partisan activity.

Our experience is that the biggest barrier—particularly for charities but generally in civil society—is that organisations are very concerned not to appear to be political. It is one of the reasons that they do not want to register under the Lobbying Act. They don't want to be seen to be in any way trying to influence the outcome of elections. What they want to do is influence people to vote, not how they vote. In our experience, that has been the biggest problem so far.

When we go through an application process, we put a lot of time into talking through how people go about their interpretation of non-partisan because, as you probably know, under electoral law it is about not just your intent but very much about how the reasonable person on the Clapham omnibus might see you, so we talk through quite detailed things based on legal advice.

If we have any concerns that the organisation do not understand, we will often encourage them to get legal advice to make sure they do understand. It is a condition of the grants that we operate in that way. Organisations that are not charities can choose to act in a partisan way and that is fine in a democracy, but we encourage those in the charity space please to do this because the problem is the opposite. It is that they can and should be able to do this and some of them are not stepping forward.

**Mrs Elphicke:** Fazilet, do you want to comment on the partisan aspect?



**Fazilet Hadi:** I think charities and pressure groups are all very conscious that we must be completely non-partisan and that it is about registering to vote, not who to vote for. I can see that some charities would be very worried about stepping on the wrong side of that and that being a bigger problem than the ones that one that make mistakes, but I have nothing else to add.

**Chair:** Moving on to the impact of various alternative systems—Mary Robinson.

Q144 **Mary Robinson:** It is great to come into this question knowing part of the answer anyway because it is about automatic voter registration and I think we have heard loud and clear from each of you that you think it is a good idea.

Would you like to say anything more about the impact it would have on the groups you represent? We have heard most of that but I want to look at it from another perspective. Concerns about data protection have been raised. Is data protection a concern for the groups that you represent?

**Sila Ugurlu:** Data protection: it depends on what kind of route we are going on for automatic registration. There are so many options and it will take some time to decide. For example, data from university student loans, the DVLA, and national insurance is data that we are already putting out there; it is data that is already being collected. We seem to be regulating elections even more with the introduction of voter ID and the data protection is on a similar scale. This is not data that is kept secret. It is already out there. It is just about tying it to the electoral services.

Q145 **Mary Robinson:** Do you think that younger people have fewer concerns about data sharing and data protection than others?

**Sila Ugurlu:** I would not say so. I think they are more literate about data but their concerns are the same. They are not an alien group of people. Generally, throughout society, people's concerns about data protection are the same. However, young people, for example getting driving licences, are giving all this information out anyway and they will be giving that same information out when they register to vote so why not just merge the two and have the data combined?

**Mary Robinson:** Fazilet, can I ask you the same question?

**Fazilet Hadi:** I don't know that I have a view on automatic registration although this panel is obviously very strongly for it. What does concern me a little bit and what would have to be built into it for me is knowing the needs of the people who are being automatically joined to the register. Otherwise, we have a neat kind of solution but I cannot see that some disabled people would benefit from it. Nothing else would change about the process or the service they receive, the accessibility of services and whether it is postal or going to polling stations or voter ID.



Nothing changes, in a way; all those barriers I talked about before would remain but we would have just been somehow magicked onto a register. That worries me as well because I think this debate seems to be around a smooth and efficient process rather than what we really need to make people feel that they are part of society, that they are citizens and that they have a right to vote—to be a voter. How do we make people feel that? Is that through automation? I am not against automation but, to me, it does not answer the whole issue about how to make the 14 million disabled people part of society—not us and them, and not just “Let’s have this easy, simple process that most of us can use but not bother about the people who cannot use it.”

If automation comes with other things, such as spending more time on the people who need support, that is fine but it is not if it is just another way of cutting costs and moving people’s names around more easily. There are issues with data protection. The previous panel was saying that people who want to stay anonymous, where they have reasons for not being visible on a register, need to be able to opt out and I think that should weigh in with us as well.

**Mary Robinson:** Fiona Weir, do you have a view?

**Fiona Weir:** I think data protection issues are important, certainly to the Reform Trust. We fund a lot of organisations in this space so we have agonised about this issue.

We are reasonably comfortable that a lot of the issues can be dealt with and the main issue is more about making sure that they are dealt with. For example, on privacy issues and the misuse of data, the biggest issue is not about establishing your central electoral register, possibly off the back of the DWP information system, but becomes more down the line if you get mission creep and people have all kinds of other ideas as to what it might be useful for. But if you have the discipline to allow that, there are lots of safeguards that you could put in place that are protective of data protection and privacy.

The Electoral Commission has done feasibility studies looking at the IER digital gateway and feels that some of that work has been encouraging. You certainly need very clear rules about, for example, data being available to third parties. I think there are lots of these kinds of details that need to be carefully and properly thought through. That is why I am positive about the fact that there are good models from other countries that have already done some of this, which have quite a lot of learning that we can very easily study and use to design a system that is pretty rigorous.

Q146 **Mary Robinson:** Another option within the current individual voter registration model is to give electoral registration staff additional powers to automatically update the register from local authority data. Would integrating electoral registration applications with other public service data encourage under-registered groups to register? What specific data



sets would be most useful to reach as many voters as possible?

**Fiona Weir:** A centralised register is compatible with EROs having their own geographic jurisdiction and being able to do data mining. That is possible as a form of design.

As for some possible sources, there are about 6.5 million passports issued a year and 4 million driving licences; 2 million people apply for universal credit; 800,000 apply for child benefit and 450,000 for disability benefit; a couple of million students enrol and about 500,000 notify the Student Loans Company. Those are just some examples that show the scope for doing all kinds of things, whether it is an opt-in mechanism or something direct. There are lots of different ways that the system could be designed to add automaticity and—in response to Fazilet Hadi's views—free up EROs to not be spending their time working out that nearly half of this registration surge is due to duplicates, which must be a soul-destroying task, but spending their time thinking through, with the knowledge of their local areas, how to tailor their services to reach and work well for local communities. That is what we would like to see local-based staff freed up to do and an automatic system lets them do that.

Q147 **Mary Robinson:** You mentioned a lot of potential routes there. Is it any in particular or just all?

**Fiona Weir:** We are naturally greedy as an organisation. We would go for as many as we could.

Q148 **Mary Robinson:** I will direct my next question to Sila Ugurlu, if I may. One of the potential routes would be for young people to be automatically added to the register when they receive their national insurance number. How would that be received and what impact would it have?

**Sila Ugurlu:** I think that is the best way that we as a charity can think of. When we consult with young people—and we recently consulted with young people for our campaign for The Body Shop with votes at 16—that was the most popular way with them. It doesn't have to be a big spectacle. They get this letter anyway. It is something that is already processed so having voter registration incorporated would be fine.

I don't think schools would be useful sources. A considerable number of young people who are not in school or university could fall through, as with driving licences. The rate of obtaining driving licences is falling. Doing it along with national insurance would be a way to get everyone seamlessly on the register, so yes, I would like that.

Q149 **Mary Robinson:** The evidence from Wales seemed to suggest that activity within schools, and registering early in schools, would be part of the solution. Would you think that could be part of it?

**Sila Ugurlu:** It would definitely help but I think it would be easier if we stuck to one way, with the national insurance number. There is no need to have different methods when the national insurance number will





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basically cover everyone. Schools would help and if that is wanted and desired, by all means, yes, that would be encouraged but there are so many ways and we cannot just stop at schools because so many young people would fall through.

**Mary Robinson:** Do you have anything to add, Fazilet?

**Fazilet Hadi:** On the point about schools or national insurance, I think through national insurance is the easiest way to automate something but maybe—going back to what Fiona Weir was saying about giving more time to electoral staff to get to know their communities—visiting schools, residential homes or disability groups is much more about encouraging citizenship and voting. We can all be on a register but not vote. Some of these things have slightly different benefits. For automation, going to a Government source of data might get you the easiest result, but in terms of building the sense of being a citizen and the right to vote, I think relationships with schools and other institutions is important.

**Mary Robinson:** Thank you. I almost feel that ways to get people to vote could be another session entirely but I will leave that.

**Chair:** Thank you. Natalie Elphicke will ask the last questions.

Q150 **Mrs Elphicke:** I am going to focus on the impact of the voter ID on the rate of registration. We have heard a lot about the registration process itself. Do you think that there might be a bright side—a ray of sunshine—in the conversation we are having around voter identification in terms of greater public awareness of the voting system and what is required? How do you feel the public information campaign and discussions about it have been received so far? Who would like to go first? Fazilet Hadi?

**Fazilet Hadi:** Yes. My sense of it is that it has been very much a general campaign targeted at everyone. I have not seen much evidence of people trying to explain voter ID to people with learning disabilities or those living with dementia, or how it is going to work if you have sight-loss and it is hard to take a photo. I have not seen much evidence of targeted information campaigns.

I know that when the trials were done in 2018 and 2019, a special effort was made in some of the trials to talk to people with learning disabilities and once they had had that conversation and they understood that a voter photo ID was necessary, they were satisfied with the process. However, I suspect that now that the campaign is at scale across England, I don't think that level of outreach will have happened so that does worry me.

Another thing that worries me is that if people do not have a passport, a driving licence, a blue badge, or a senior citizen's or disabled person's bus pass, there must be a reason why they don't have those things and one of those reasons might be that they are quite isolated, will struggle with the process and are not very connected with the world. So what do we do? We say, "Go and get a voter authority certificate" where you have



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to take a photo and go through the same sort of process, almost, that you would have had to go through to get any of these other forms of ID; if they could have done that, they would have done so. It bemuses me slightly.

I have just gone through a passport application as a blind person, where someone helped me to go into a photo booth and we could not align it properly. We tried but we just could not make it work, and there are lots of rules about passport photos, as there are about the voter authority certificate: don't smile; don't wear headwear; don't do this; don't do that. To make sure I got the right photo in the end, I had to pay £12 to someone in a shop to take a photo, and that is not available to people on benefits or low incomes. I find the process completely bemusing. Why do we think a voter authority certificate is something that a person who has no other form of ID that we accept will find easy to get? I would be very interested to know how many people do get them. I think it is about 60,000 at the moment. I think I saw that. I know that it is the law now but I think it will disenfranchise many thousands of disabled people. That is very sad.

Q151 **Mrs Elphicke:** Can I follow up on that? We heard earlier about the process of collecting this information. Were you concerned about whether there were adequate steps being taken in the polling stations to record if people had difficulty in voting or were turned away and the reasons for that?

**Fazilet Hadi:** I think I understood that if meeters and greeters or the electoral staff turned people away, it would be recorded but the reasons for why did not seem to be being recorded. So was it that they had not heard about it? Was it that they could not grapple with the process? To do something about it and to learn from those stats, we would have to know a bit more than just x hundred people did not come with their photo ID. It is probably too late now but I think we need to think about what barriers stop a person from coming with a photo ID.

Q152 **Mrs Elphicke:** Yes, I think that is very well put. Thank you. Sila Ugurlu, what do you think? How is the voter ID impacting the rate of registration? Has there been good awareness or do you still have concerns?

**Sila Ugurlu:** Looking at the online Government tracker for the replacement certificate, only 1% of the general population without a photo ID have applied, but 1,237 young people under the age of 25 have applied, so I reiterate what has already been said about these disenfranchised people. They do not already have ID and they will probably not register for this.

The public information campaign has been very recent. We have not had much time to collect data on it. However, I will say that it does rely on institutions such as charities to be available to campaign around the clock throughout the year when this is not in the nature of an election. In the run-up to an election, these campaigns increase. There are campaigns



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with CitizenCard and NUS to get a cheaper ID for university students but, again, this goes back to the question, "If they do not already have ID, why is that the case?" They are probably disenfranchised. Are they going to be getting these temporary replacement IDs just for an election when they may not even be registered for an election or they may not even be intending to go to an election?

I don't think the public information campaigns have been very successful but if this carries on for future elections, they will need to be stronger and more widespread, more directed to disenfranchised people and not just be general campaigns targeted at those who are already engaged with our democracy and already have IDs.

**Fiona Weir:** Yes, they are the same demographics that are probably most likely to be affected as the ones that are currently not registered. I am quite surprised that the media have not drawn attention to the fact that at every election, much greater numbers of people are not registered. On one level, that is the bigger story but it is just not as topical.

Because so many commentators have raised concerns that voter ID could be an additional barrier, it will be very important that the quality of the data that goes into the assessment that feeds into the Government's independent assessment later this year is good. There are a few concerns in that space. One is that local elections have much lower turnouts and the people who do turn up to vote in local elections are not the ones who are the most likely not to be registered. There is a risk, therefore, that it does not show you what happens with the groups that might be affected in the general election situation. There is a genuine problem around whether we can apply what we see usefully.

I think there is also a problem around people who suddenly realise they do not have a voter ID in time, that it is too late and do not even turn up. There is almost no research way to identify how many people are in that situation so we inevitably will be underestimating.

In addition to what local authorities are doing, democracy volunteers will be training lots of observers to be independent observers at polling stations and we will also be talking to people who are turned away. There are lots of voluntary sector initiatives in place that can usefully be triangulated with ERO and Electoral Commission data but I think it will be quite hard to build a clear picture after May, and that therefore raises some very big questions about the general election and what impact it may have then.

Q153 **Mrs Elphicke:** Finally and briefly, if I may, we have not touched on housing during this session and there are a lot of good observations about a system that is designed essentially for an established, static population of a majority view. In some areas, the housing population is not static, it moves and churns a lot, and individuals might move and churn a lot, particularly young people. Can I ask for brief observations on



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whether you think the residential aspect is having a particular impact on any particular groups and whether we need to think more about the housing aspect when we are looking at engagement in elections?

**Sila Ugurlu:** I will answer that, but can I very quickly add something on the last question that I forgot to mention?

**Mrs Elphicke:** Please do.

**Sila Ugurlu:** It is very concerning that young people's rail cards and student IDs are not accepted as voter ID whereas perhaps their grandparents' rail cards, travel cards, and Oyster cards are accepted. It is something to note for the record, that that is quite problematic.

On housing, yes, that has a significant impact, especially in the housing market crisis, with rising rents and changing where they move to all the time. About 40% of those in rented accommodation are not correctly registered in comparison with 10% of those who own and live in their own homes. There is a big contrast there. Whether young people are changing housing for college or university or early careers, it is very useful, we note, that you can now have a university address as well as your own address, but these constant changes are just adding more administrative effort to those who are already disenfranchised.

It goes back to the idea we were talking about with the replacement certificate for ID. It is the case that if these people are already disenfranchised, why would they want to jump through all these extra hurdles to constantly update the register? This administrative burden is not present for those who own their own homes or live in their own homes or have been at an address for a considerable time.

**Fiona Weir:** About 58% of private renters and about 91% of owner occupiers are on the register and that is one of the biggest gaps in registration, unsurprisingly.

Q154 **Mrs Elphicke:** Do you have figures for social renters?

**Fiona Weir:** I do not have that figure. A number of renters' organisations are getting active in this space. We funded one of them to produce a detailed data hub that puts the new census data on with the ONS registration data. They have the 22 million PRS renter data as well, so you can identify exactly where particular clusters of low-registered renters are living, as a tool that will enable others to identify them and try to get registration campaigns going. It is in the very early stages but it is something where MPs can put in their constituencies and look on dashboards to see exactly where the low-registered clusters are. It is a potentially very useful tool.

It is early days but there is some thinking around how to tailor things and I know there are some discussions around how to get the people who work with renters or people in social housing more actively involved. That is the institution idea again—getting it on to the right websites and so on.



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There is a mix of things happening but nothing commensurate with the scale of the problem. You will see some good initiatives that will get, say, 20,000 registrations here or there, but they will not get to the multi-million gap that we have at the moment and that is the problem. A lot of ingenuity is going into getting quite small numbers.

**Fazilet Hadi:** Very briefly, 54% of tenants in social housing are disabled people or may have disabled people in their household. Perhaps social housing could do something about this—an enabling role around citizenship and voting. There is a growing number of disabled people in the private rented sector, which is the most precarious.

A key point that I want to make is about disabled people who are currently living in residential homes, whether that is older people or people with learning disabilities in supported living or autistic and learning-disabled people in assessment and treatment units, or people in mental health settings. All these people should be able to exercise their votes and I think we are not paying sufficient attention to how we are supporting disabled people in residential settings to exercise their votes. That could be something that electoral registration officers and their teams could pay more attention to.

**Chair:** Thank you, all three of you, for coming here this afternoon and giving evidence. It has been very helpful. A wide range of challenges still exist in the current system and our job as a Committee is to consider all the evidence that has been and will be put to us and make some recommendations. What you have said to us this afternoon about the concerns and challenges that you have identified, and your particular expertise, have been most helpful to us. Thank you very much for coming and giving your evidence.