



# Constitution Committee

## Corrected oral evidence: Voter ID

Wednesday 8 November 2023

11.40 am

Watch the meeting

Members present: Baroness Drake (The Chair); Lord Anderson of Ipswich; Baroness Andrews; Lord Falconer of Thoroton; Lord Foulkes of Cumnock; Lord Hope of Craighead; Lord Keen of Elie; Lord Mancroft; Baroness Suttie; Lord Thomas of Gresford.

Evidence Session No. 2

Heard in Public

Questions 18 - 30

### Witness

[I](#): Peter Stanyon, Chief Executive, Association of Electoral Administrators.

### USE OF THE TRANSCRIPT

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## Examination of witness

Peter Stanyon.

Q18 **The Chair:** Good morning, Mr Stanyon. We are resuming our session as the Constitution Committee. We are taking evidence in our inquiry into voter ID. This morning we are taking evidence from Peter Stanyon, chief executive for the Association of Electoral Administrators. Thank you already for the support you have given us in the seminar we held, but now we are on the record and taking evidence. Thank you very much for coming again today.

Before we go into questions, you and your colleagues really are in the thick of it when the elections start. Are there any opening comments you would like to make?

**Peter Stanyon:** Not really, no, other than to say I agree with almost everything my colleagues from the Electoral Commission said earlier. I am sure you will drill down on some of those questions for me, but the key point is about all of the changes and the compound risk being introduced with all of the layers. Craig mentioned the layers. That is something that is becoming very obvious. I am sure you will ask me questions with regard to staffing. It is not just to do with voter ID and the changes here. This has been a growing issue for a number of years, which may be of interest to the committee going forward.

**The Chair:** Maybe we can drill down into that compound risk because that is certainly something we are interested in. Thank you very much. You have had the benefit of sitting through our previous evidence session. We are going to pose very similar questions.

In your view, what steps need to be taken to raise awareness of the voter ID requirement and the existence of the voter authority certificate? This question is about the awareness issue. You heard the supplementary questions from my colleagues Lord Keen and Baroness Andrews about whether there are particular points, particularly for the demographics that are least aware, that could be taken advantage of. We would welcome your views on that.

**Peter Stanyon:** It needs to get to business as usual. We have to accept voter ID being required at every level of poll in the UK, apart from the devolved polls in Wales and Scotland. It will take time. I gave evidence to a committee in the other House. It is very clear that we need to go through a four or five-year cycle of parliamentary elections, GLA elections and PCC elections.

The electorate who voted in May in two-thirds of England have been through this process once. They have a greater level of expectation about requiring it for future polls. A third of the country in England does not have that experience. Scotland has none of it; Wales has none of it. Going forward, in terms of the communications, it is about a long process to bring that into the psyche of electors attending a polling station. This is not consistent. I am thinking about the evidence given by a colleague to

the same committee I quoted. Eastern European voters, for example, are very used to this. They were surprised they did not need to give ID prior to the May elections. Most voters are not aware of the provision going forward.

The commission plays an incredibly important role in this. It has the expertise and the levers to pull nationally to get to the stage where the majority of electors will be able to see the message. Whether they hear it through radio, see it on television or whatever, that is the best route through.

It is also able to provide some really good template resources for local authorities to do that local targeting. Every single electoral registration officer will have a different challenge. Although we are working to the same framework, there is a need to understand the local demographics. That is where the local communications teams in local authorities really need to be engaged in terms of the best messages, the best routes and the best ways of getting that message out to all electors and certainly to the groups that may not be as likely to hear the message as others.

It is about learning good practice. One of the roles of the AEA—it is certainly the role of the commission—is to share that good practice that has been developed. We have been through this cycle once. The next cycle will be the 2 May elections and the potential general election that we know is happening within the year. That will give the platform for everybody to start to work out what works for them.

Just to give you a really good example from London, I would highlight the work being done by Elisabeth Pop at the GLA on the #NoVoteNoVoice scheme that has been running across the capital. That is not just a blanket campaign; they are trying to target into areas where greater knowledge—different languages and different forms—is needed.

Going back to my original point, business as usual will come, but it will not come in May this year. It will come after a cycle of people being regularly engaged in the polls. Again, we are looking at double the electorate voting at a parliamentary election compared to the 32% that voted in the local elections in May this year. Half the electorate who will be engaged have not had the opportunity to receive that message.

That message is also going to be incredibly difficult for Scottish and Welsh colleagues, where you have the devolution element coming into that as well, where it will be required at one poll but not another poll going forward.

That is a bit of a woolly answer, but the role of the commission is hugely important, to lead local authorities and in terms of the targeting that is necessary. We need to talk to the third sector about how we do it and what are the best ways of getting that message through.

**The Chair:** We have had written evidence and we heard evidence this morning about the differential impact of awareness of voter ID and the

VAC process as between different demographics. Could I take this opportunity to ask whether, in your experience, you are capturing the demographic dimension in terms of where the particular vulnerabilities are?

**Peter Stanyon:** There is nothing that is reported as such. This is the difficulty. It is not something that is legally required to be understood or even collected. There will be data issues around that.

Anecdotally, the message coming through is that there is less engagement from elderly residents, students and black and minority ethnic communities, for example. It is so difficult to analyse. You effectively receive an application to register to vote, for a VAC certificate or for an absent vote. There is no recording mechanism for which group that has come from. I might have used the incorrect wording there.

The key point is that it is purely anecdotal from the demographics of the area you are working in. Again, without having the statistics to hand, I know there was a lower take-up in some areas than in other areas. Was that to do with demographics? Was it to do with poor communication? Was it to do with other local factors? It is very difficult.

I have great sympathy with trying to understand where the challenge is because the mechanism to support the reporting is limited going forward. A lot of it is anecdotal.

**The Chair:** What impact do you anticipate that voter ID will have on the turnout at the next general election? Again, you have hesitated over the anecdotal data on demographics, but if you can extend that question into how this might vary by different demographics, the core issue is turnout at the next general election.

**Peter Stanyon:** I could almost quote Craig. It is not something we would necessarily plan for, other than from my previous experience of directly delivering elections. I would always be planning for—I am sure the majority of returning officers are the same—a turnout in the region of 80%. You over-plan and over-resource as best you can, because ultimately there will be challenges throughout the electoral process. Staffing may drop; you may have difficulty with polling stations and things like that.

I was doing some quick research yesterday. I believe there are in the region of about 47 million voters registered for the next parliamentary election; it may be slightly higher than that now. We are talking about in the region of 23 million of those not having participated in the May elections this time around. That is just by rule of thumb, with a 100% increase in turnout from the figures that are there.

The other factor that makes it difficult to judge what turnout will be is the new parliamentary constituency boundaries, which come into force before the end of the year. We just do not know what the impact will be in local areas. Traditional safe seats for one party may well become hung seats

or whatever the case may be going forward. That will factor into whether people feel it is worth voting in some respects.

It is an almost impossible situation to judge, but I would be very surprised if the turnout was not in the normal region. In the last parliamentary election it was 67%. I would be very surprised if it were not in the ballpark of 65% to 70%, again purely because of the fact that parliamentary elections drive turnout due to the nature of the election itself.

**The Chair:** What you say about parliamentary constituency boundaries changing is quite interesting. Perhaps we can pursue that further when we come to the administration issues. It is not an issue we have asked any questions on at the moment.

Q19 **Lord Hope of Craighead:** I would like to look more closely with you at the two processes for applying for and then issuing voter authority certificates. In particular, I would like to take your view as to whether there is room for improvement based on your experience last May. Do you have any advice as to what these improvements might be?

To begin with, could you perhaps talk us through what these processes are? What has to be done to apply for these certificates? What is the process for issuing them?

**Peter Stanyon:** The process is that the application is made through the online portal. It can be done by paper. There is still the route that it can be done face to face in local authorities, but the expectation is that the vast majority will be done on the portal. It is a much simpler system to process through.

Ultimately, what happens is the elector must upload their photograph and confirmation of their registration details. That will be validated. If everything gets a tick in the green box, the government-procured printer will produce the actual document that will be sent out directly from a central point to individual electors. There are some contingencies there if there is non-delivery or slow delivery ahead of an election, for example.

This is repeating something Tom said in his evidence in the previous session. Effectively, the front-facing part of that portal is very easy to work your way through. It is very good. It is very good in terms of the customer focus. The issues that happened in May were more around workarounds that were needed behind the scenes where a system did not work smoothly.

For example, in May there was a lot of confusion about the cases where a photograph was not of the quality the electoral registration officer could accept. Legislatively, the photograph is prescribed quite closely. It must be with a clear background and the like. The problem we get is that it can be difficult to manage. If I look at your image on the screen, I can see it is Lord Hope. However, you have a bookcase behind you. That would be rejected on the basis of the rules we have, yet in a polling station I would actually be able to say, "Yes, that is a true likeness".

That was a difference to do with the way the law worked. It became more of a pragmatic view that was taken as we got closer to an election. That was the sort of issue that the administrators faced. That was because you had the registration officers coping with the application process. In the main, that is a quite smooth process. When there was a discrepancy, you had to do a lot of manual chasing to ensure you could get the right photo and the right details of that individual and then tick the box to send it through to the production of the actual voter authority certificate.

On the other side of the coin, that information is then being passed over to the returning officer and their staff in the polling station. Is that a true likeness of the individual who is stood before you? There is a balancing act between those sorts of things.

**Lord Hope of Craighead:** I can understand what you have been telling us about the online application. In my case, for example, I assume that the picture you have of me would not pass, but I could scan and attach a photograph that I know does satisfy the requirement.

**Peter Stanyon:** Absolutely, yes. That is exactly it. The issue, however, is that one registration officer will accept your image, but another registration officer might take a different view and play it exactly by the book, effectively.

The system that was rolled out in May has been improved behind the scenes since then. The Government have made the changes that are required, which are ongoing, to the system itself. It is a far more usable system now than it was back in May, and long may that continue.

A lot of the issues come down to the fact that the system has not been fully stress-tested. In terms of the number of applications coming through, in its report the Electoral Commission quoted that 89,000 applications were made in that period before the election. Somewhere in the region of 250,000 were expected in that period.

Until we run the general election, with the potential for more applications to come through, we will not know what that stress testing will be on the system and whether more people will accept an image that is not of the prescribed quality simply because they want to allow that individual to cast their ballot when it comes to the election.

**Lord Hope of Craighead:** On the online system, do applicants get guidance about the photograph? Supposing I put in a photograph that does not satisfy the officer to the required standard, is there a hinting process or some sort of guidance process to say, "Come back again with another photograph that meets the requirements"?

**Peter Stanyon:** As far as I am aware, the guidance is simply there to say, "This is what you are required to submit in terms of your photo". Each individual application will be presented to me as a registration officer. As a team, we will then need to make a physical determination as to whether that photo is acceptable.

There is not a system, as there is with passports for example, that says whether you are in the box, with the circle and the egg-shaped-head sort of thing. That is not there. It is very much a manual process for each individual photo. It is for the individual in the office to determine whether it satisfies the actual reasons.

If the photo was not of the standard that was required, it would then trigger the actual process of saying, "I am terribly sorry. You will now need to provide us with a different photo".

**Lord Hope of Craighead:** That does not seem very satisfactory. As a user, I would like to be given an opportunity to produce a better photograph, if I have been told that my application has been turned down. Is there not room for improvement there? Could we introduce some element of guidance or at least give somebody the opportunity to come again with the correct photograph?

**Peter Stanyon:** I do not know the full complexities because I am not particularly IT-literate in a lot of ways. Certainly, if you think about the system that is used by HM passport officers, for example, the question was raised about why we cannot use a similar system that is integrated into the voter authority certificate process. Again, for reasons of policy, cost or whatever it might well be, this is the system we have today.

The improvement could be made, certainly, but that is a technical change to the system that is out of the control of returning officers and registration officers.

**Lord Hope of Craighead:** We have to think very carefully about people who are not literate or skilled in using IT and online systems. They will be applying by post, I imagine. There is also a time question as to how that fits in with the relevant timetable to be available with the certificate when you will need to turn up at the polling station.

Presumably, paper applications are still going to be acceptable. Otherwise, you would be excluding quite a significant part of the electorate, would you not?

**Peter Stanyon:** Yes, absolutely. There is always the ability to apply by paper, preferably face to face at the council office because the photo will be taken by the staff themselves. I would guess that service might become more widely used as we go towards a parliamentary election, simply because there may be more people wanting to come through that part of the process. That paper process is still there.

Yes, there is the potential for a longer delay following the paper route than there is for the online route. That is consistent across all electoral services. The digitisation that has come in will do a lot to speed it up, but there is always the need to have that secondary option of paper available, which will be more traditional, shall we say.

**Lord Hope of Craighead:** My impression is that there is not really a problem with the process for issuing. It is a question of application and

whether people fully understand what is needed and are able to meet the requirements.

You have perhaps touched on my next question already, but do you have any recommendations to make as to how the process might be improved? Was the proportion of the testing that went on so small that you do not feel able to make any recommendations? I would like to think that you would be able to suggest some based on your experience.

**Peter Stanyon:** One of the frustrations—it was referred to in the previous session—is that the whole electoral community went into the latter stages of the development of the policy into legislation expecting a driver's licence-type card. That was what was expected. For reasons of bulk processing, it is easier to produce paper forms than it is to produce plastic cards, for example. Therefore, the decision was taken to move it to an A4 sheet of paper that is still valid for 10 years.

At this stage, one of our concerns is whether the piece of paper will last 10 years. We have a concern that individuals who received VACs in May may well have simply put them in the shredder or thrown them away not thinking they will need it again, and we then get into a cycle of the same people coming forward again. That is one of the downsides to the bulk processing situation. We might need to do some more work around that.

The other area that we as an association are very keen on seeing—we cannot understand why it was not progressed—is the digitisation of the actual VAC itself. We came out of the Covid election, if I can put it that way, and the Covid situation, in which Covid passes were readily available on smartphones. A number of the benefits could be realised by allowing the production of that card on a digitised device. That would be of benefit to the elector and in terms of a lack of paper flying around the system.

Linking back into that, it goes back to the questions that were raised earlier about the deadline for the production of the certificate being six days out. That could allow for a later production of the VAC simply because the piece of paper does not need to be posted out to an individual.

I am not sure we have come out with any strong recommendations around that, but those are certainly areas that we think need to be looked into, looking at it from the view of voter expectations as much as the stresses on the system itself.

**Lord Hope of Craighead:** If you were to bring in these changes, would they require legislation? Can this be done by administrative processes and issuing advice to people in the ordinary way?

**Peter Stanyon:** I believe digitisation would require legislation because it would change the way something is developed. In terms of a different way of producing the card, that is a decision made by the process,



effectively. I am not 100% sure that would require legislation because you are producing the same thing on plastic rather than on paper.

It is something that needs a lot more thought before we jump into an area that might well cause other issues. Certainly, the deadlines would require changes in the framework itself.

Q20 **The Chair:** I just have a couple of supplementaries, Mr Stanyon. From what you are saying, there is a dependency here. On one level, reducing the six-day deadline so more people can apply near polling day for a VAC is a desirable thing in terms of people getting the opportunity to vote. From what you are saying, unless there are improvements in the VAC issuing system, it is just going to create more problems than it actually solves. Is that what you are saying?

**Peter Stanyon:** Everyone wants every elector to have a chance to vote. The intention to bring the deadline closer to polling day is absolutely valid, but, given where we are currently with the system's ability to support the delivery of elections, adding more pressure into those last few days would create a significant risk of bringing that system down.

One of the things that has become very apparent is that, when you look at the Elections Act provisions in isolation going forward, each individual one is deliverable, but it is that compound risk that I was talking about. If you were to bring the deadline for VACs to two days before the poll, for example, if that were the only thing we were doing and we had a very level system going forward, we could probably cope with that, but there is so much other change taking place at the same time and that has not yet bedded in. That is where the risk would come. That was a very long-winded answer. Yes, it would be administratively difficult, but, from the voter's perspective, it would be much better.

**The Chair:** In your evidence you also referred to the position of people who did apply in good time, even on the current deadlines for the VAC, but there was a failure in the delivery of it. If the courier or whoever—I will not name names—does not get it to them on time, there is no way they can mitigate that failure, although they have applied in time.

**Peter Stanyon:** There are mitigations within the system. I am no expert on those, but for things such as late applications and non-delivery there is the ability either for reissue or, in certain circumstances, emergency proxy at the actual polling station. If the individual cannot vote, they can have their vote cast by somebody who is already registered.

It is a myriad of confusion, without any shadow of a doubt. In that last few days before the actual poll itself, it is almost a case-by-case basis as to whether it will get through to an individual who has made their application in time or whether they will have to vote via a proxy arrangement, for example.

The mitigations are there, but a deadline is a deadline. Ultimately, there will be people who fall through the cracks sometimes because of the bureaucracy in the system.

**The Chair:** I have one final question. Mr Hawthorn went into some detail about the recommendations on the functionality and the operation of the portal but was awaiting a response. From those administering it, there is a balance in terms of whether you have to build in a margin of resource because you do not expect the portal to be more efficient. You are going to have bigger problems with an unimproved portal as opposed to having a higher level of confidence about the efficiency of the portal. Where is that balance in time in terms of getting a response from the Government and getting the evidence that the portal is improving?

**Peter Stanyon:** As Tom mentioned, the crucial bit to this is that any upgrade or change cannot happen during the elections period. There was evidence about this in the run-up to the May elections. The system did go down in a number of areas because of a patch that had been applied, which meant that no applications could take place certainly for 24 hours, which is less than helpful to those particular patches.

There are two elements to the improvements to the system: first, there is what needs to be done; and, secondly, there is what can be done. Even now the system is not providing—to my knowledge, unless it has changed in the last couple of weeks or so—all of the functionality required by EROs for things such as statistical reporting and understanding the number of applications and where they are in the process. That is still to be developed. It was meant to be there at the beginning, but, to my knowledge, has not yet arrived, unless it has arrived in the very recent past.

Whatever amendments are needed, they need to be risk-assessed outside of those major election periods to allow those who are administering the system to understand how the change works and then be ready to go with the change throughout the pressurised period that could potentially arise as a result of that.

Q21 **Baroness Suttie:** What impact do you anticipate that voter ID will have on the administration of the next general election? Can you make a comparison with the recent experience of the May elections and parliamentary by-elections? In particular, could you focus a little on the cost burden? Earlier, you raised the issue of new constituency boundaries. Will that create an additional cost burden?

**Peter Stanyon:** I will take the last question first. It will not necessarily create an additional direct cost. There may be hidden costs. The crucial element is that we know what the new boundaries are now but we are just waiting for the legislation to be passed to bring them into force. That is due by the end of this month, we understand. We are waiting for the Privy Council to give its approval to the changes.

Once that happens, the returning officers order will be made. At the moment there are no returning officers allocated to any of the constituencies. One thing that that order will produce is significantly more cross-boundary constituencies between local authorities. That will introduce a significant risk where they have not worked together.

There will be a risk to the election with regard to communication about the fact that voters were once in this constituency and are now voting in a different constituency. The communication about whether they have got this right is going to happen in the run-up, from my previous experience of parliamentary boundary changes.

This comes back to the compound risk, as I mentioned earlier and as Craig mentioned in the previous evidence session, and the layering of risk that is happening. Ultimately, the two-thirds of local authorities—I think it was 230—in England that ran the elections in May have experience of voter ID. They have experience of the accessibility changes, the different ways voters can vote in the stations and the assistance available.

The good practice is being shared and brought across, but, ultimately, the first time that administrations in Scotland will run the voter ID process will be at the general election because that is the only poll it applies to north of the border. In Wales, they are running it in May on the PCC elections. If it is combined, it will be the same election. If it is not, they will run it again on the fact of the reserve poll provisions.

We are then adding in the online absent voting application portal. It came into existence on 31 October. Individuals are now able to apply for postal votes online right up until 11 days before the actual poll itself. That could introduce a requirement to provide national insurance number and further details to approve postal votes right up to the close of the poll. That is another level coming in.

Reference was made earlier to the overseas electors changes and the removal of the 15-year rule. That will lead to a spike in registration immediately ahead of the general election.

The compound element of all the learning that needs to be done by the core teams is the biggest risk. These are the same teams that will then deliver the actual polls on 2 May for the local elections and whatever day is chosen for the general election itself.

The worry is that some bits may not be picked up in all those areas because of the complexity coming through. I have previously made the point about the different workstreams. We can cope with one workstream by itself. In some areas, we are potentially looking at six or seven different workstreams all coming at this last-minute period.

The crucial element in the election, the biggest pinch point, will be between 11 and 12 days out from the poll. That is the close of registrations and online absent voting. Six days before the poll, the voter authority certificate process will close. All throughout that period you have that pressure on processing applications.

It is not necessarily the ones that go through smoothly. It will be the ones that need that further response: "Can you provide us with the evidence?", "Can you provide us with a separate photograph?", or "What is your national insurance number? Why can you not provide it?" It is

those sorts of things. That is where the risk will come on the registration side, which will then feed into the actual delivery of the election because effectively the same teams will be delivering those. I do not know whether that answers your question.

**Baroness Suttie:** In terms of the experience of the May elections and the various parliamentary by-elections this year, have you heard about instances of abuse of staff as a result of the introduction of voter ID?

**Peter Stanyon:** Anecdotally there have been reports made not just by polling station staff but core teams as well. Very little has been reported behind that. It sometimes becomes the expectation when we go into these sorts of things.

There was one report to the police that I am aware of from May. Every single returning officer will now be risk-assessing that. The response that can be provided will vary from place to place. What is it that the staff can do? Certainly, in the training we deliver as an organisation, we make very clear the need for customer service skills in terms of how to defuse situations.

There has been a slight change in the way we need to cope with these sorts of things. Ultimately, I would expect there to be a slightly more heated atmosphere at a parliamentary general election, and the potential for there to be more disgruntled voters. Certainly, the feedback we received from our members was that there was an acceptance. They understood that it was not them; they were just delivering the system in the polling stations, so the abuse was not turning violent, for example. It was just that pressure cooker, taking the valve off, because they could not vote in those situations.

The evidence showed in the number of voters that came back in May. The majority went away and came back with the right ID. I took some statistics from the Mid Bedfordshire by-election recently. There were very similar figures between May, their local elections, and that particular parliamentary by-election. There will always be those who will go away and come back. There will always be those who are very disgruntled all the way through. It is about risk assessing and making sure that staff have the tools available to them to cope with those situations and the lone working arrangement they are in.

**Baroness Suttie:** It strikes me that planning and training is needed particularly for the late voters, voters coming after 9 pm or 9.30 pm, when it could be logistically difficult for them to go back and get additional ID. Are there plans to have additional training for how to deal with those?

**Peter Stanyon:** It will be down to each individual returning officer to determine how and what they provide. In those sort of situations, it has to come down to the quality of the training and the quality of the staff to be able to cope with difficult customers, for want of a better phrase. That is the known. It is a 10 pm deadline on poll. If you are not in a queue by

that point, the guillotine comes down and you are not going to be able to cast your vote. There will always be, at every election, disgruntled voters. There is the potential for there to be slightly more until we get back to the business-as-usual type of thing, where people know there is no point turning up without that ID going forward.

**Q22 Lord Foulkes of Cumnock:** Can I ask, Mr Stanyon, the same question I asked your colleague from the Electoral Commission? How will you cope if the general election was held on 2 May, along with the local elections in England and the elections for the police and crime commissioners?

**Peter Stanyon:** It is the horror scenario, in many respects, that returning officers are planning for now. Mr Westwood made the point that the commission have three plans in place. We are certainly encouraging returning officers to have, similarly, three plans in place: one for a combined poll, one for a standalone poll and one for a snap poll later on in the year, for example.

Logistically, it will be extremely difficult, because the likelihood is that the majority of the planning work for the PCC elections, the local authority elections and the GLA elections will not have been completed but will be very close to completion as it begins to become live. If I have my dates right, 27 March is 25 days out from 2 May. If the election is called at that time, postal votes will have been prepared in a lot of areas to go. It will mean doubling up on postal votes. There will be doubling up on poll cards.

There will be arrangements for staffing. Do we need additional staff in a station to deal with the fact that you are now dealing with four ballot papers rather than three on 2 May, if you take London as an example? For colleagues outside of London, it could be one, two or three, depending on their areas. What are the implications on the counts? Is the venue big enough? How does it flow out in terms of the legislative requirement to commence the count for parliamentary elections within four hours of close of poll?

That will be an almost impossible task, if not an impossible task, for those who have more than three polls running, because of the verification process. We would say that it is a massive challenge. It will be delivered. There is absolutely no doubt about that, but that is an extremely difficult set of circumstances to deal with, as would be a parliamentary election called, for example, in June, because you are dealing with the end of one election and going straight into another one, with potential crossovers and the like. Whatever happens, we know that in the next year it is going to be an extremely challenging election timetable going forward.

**Lord Foulkes of Cumnock:** You would need a lot of extra staff for 2 May, would you?

**Peter Stanyon:** Yes, potentially. It would not be a lot extra; it would not be doubling up on everything. Taking polling stations as an example, there will be the need to make sure the flows are as easy and efficient as

they can be, bearing in mind you are issuing two, three or four ballot papers, as the case may be. There will be an increase in that.

**Lord Foulkes of Cumnock:** You have only had the ID at local elections and by-elections so far. Imagine the situation where you have to check the ID and issue three ballot papers. It is going to be hugely more complicated to do that. Surely you will need quite a lot of extra staff to deal with that, otherwise there will be huge queues.

**Peter Stanyon:** The process itself means that at any combined poll you will always end up with additional staff requirement, because you are dealing with a corresponding number list that may be individual; it may be a combined list of who you have issued the vote to. The factor is that, for the voter ID process, it is just the one occasion. That will be whatever election you have, whether you have four ballot papers or one ballot paper. You would need to make sure you have that working efficiently and there will be challenges around whether those individuals do not have ID or have the wrong ID, as the case may be. There will always be, however, that need to make sure you have the resource behind that for the second issue, which is to go through the process once they are validated.

We have run combined polls before. They are always testing. They always require extra staff. It is not 100% extra over the top. We are not doubling the number of staff, but the number of staff required from previous experience plus one member of staff to deal with voter ID will probably be the figures that will be looked at in polling stations across the board. Yes, there will be more needed and that is a challenge because of the lack of staff available to returning officers at this current time.

**Lord Foulkes of Cumnock:** I was very interested in what you said: that it may take four or five years before electors got used to this, and that the psychology of the electorate would have to change. How would you contemplate a return to the status quo ante, to the old arrangements? If a new Government suggested that and legislated for that, how would you react?

**Peter Stanyon:** We would just take the files from two years ago, reopen them and get back to the old way of doing things. Joking apart, any change to electoral systems will involve challenge. It comes down to the fact that, under the old system, if somebody turned up with ID, they did not need it, so it did not stop them voting. If you went back to the previous system, if there was a legislative change to do so, it would not make that much difference to the delivery because they may have their passport with them; you are just not checking that in that way.

As was mentioned by colleagues from the commission, if that were to happen, it would need a reasonable lead-in period to allow for all the changes, the understanding, the communications and the like, not just with the electorate but also with the staff who are managing that process.

**Q23 Lord Thomas of Gresford:** If you have new constituency boundaries overlapping local election boundaries, if the elections take place on the same day, presumably you have different boxes that have to go to different counting places. You have different returning officers in respect of the person's vote. The whole thing is split. I understand the complication. Is there just one person who satisfies themselves on voter ID in a situation like that?

**Peter Stanyon:** Do you mean in terms of the actual application process and then the voting process?

**Lord Thomas of Gresford:** Yes, both.

**Peter Stanyon:** On the application process, if you take that scenario, it is happening across a lot of areas. At a parliamentary election I may be a returning officer with one constituency. I have taken that in from a neighbouring local authority. I will be the registration officer for most of my constituency, but the registration officer for the area I have taken in will be the neighbouring local authority. When I mentioned the difference in terms of looking at photos, for example, you will have in constituencies different officers receiving the applications, because we are effectively then passing over that patch to the returning officer and then they take on that responsibility, with their staff, for looking at the photo in the polling station itself.

Yes, one of the major challenges is that consistency of approach where there are split constituencies, where there are overlapping "take and give away" areas. We have them now; it is just that there are going to be significantly more as a result of the exercise that has been announced and will become law, hopefully by the end of November.

**Lord Thomas of Gresford:** You heard my questioning about the recruiting and retaining of polling staff, and the fact that polling staff now become gatekeepers to check whether a person can vote, even if his name is on the voting list. What comment do you have to make on that?

**Peter Stanyon:** They are volunteers. All polling station staff are volunteers. They get paid expenses for doing their job, but they are not electoral professionals in the way that the core teams are. The big concern is that a lot of the responsibility is going down the food chain to those staff and that goes back to the point you made about the potential for intimidation of those staff. They have to now have an awful lot more technical knowledge than they did previously. There has always been the ability to turn a voter away, but that happened very rarely. Now, there is the chance for it to be easier to do, because there is a gate to go through before you even reach being issued with the ballot paper itself.

Anecdotally, again, there was evidence that some staff just said, "Enough is enough. For what we get paid, it is not worth that stress". It is fair to say it is an ageing demographic of polling station staff. Local authorities do not have the resources they once had to be able to backfill into posts. You will find, again anecdotally, a significant proportion of polling station

staff will have worked for a local authority and have just become ingrained into that sort of system. The challenge is backfilling that.

The role of a presiding officer in a polling station is significantly different to the role it was five years ago because, yes, you have the steps about turning voters away if they do not satisfy the requirement for ID. Tom teed me up beautifully in his evidence. We have calculated that a presiding officer now could have to complete 34 separate forms at the polling station. They will not in every single instance because it will require certain things, but there are 34 separate forms that would require the statutory declaration-type approach of confirming for the audit trails and the like.

It is a long-winded answer, again, to your question. It is hugely challenging for those individuals, with the different role they now play and the personal responsibility that falls on them as well to follow the correct procedures, because the last thing we want them to do is to not follow the rules. Whether we agree with those rules or not, they are there and they have been legislated for in that way.

**Lord Thomas of Gresford:** From what you say, there obviously has to be a huge amount of training of fresh volunteers, if you can get them. What steps are in process now to train people for what is going to be a very challenging year?

**Peter Stanyon:** Again, each individual returning officer will have their own plans. There is a myriad of ways of doing this. There is some online training, face-to-face training, a hybrid approach and all those things. The commission's performance standards are very clear. Staff should be trained to do the job. We would wholeheartedly say, as an association, that at every single election every member of staff is trained in that type of election, because there are different polls every single time it takes place.

When I first came into the profession we used to be able to take a script, change the dates each year and read the same script every year, because the change was not there that is now. Now, it is a case of making sure that the training delivery is relevant and is being listened to. The biggest risk in an election is a poll clerk who has not listened to that training, who will be the one that puts the election at risk.

There is an obligation now on electoral administrators and the teams to come up with different ways of doing it so that they are ticking all the right boxes in terms of what they must say, not just the stuff that is national but also what is relevant locally. We have already talked about some of the areas where there may be different challenges to others. What is right for Cornwall will not be the same as what is right for London, for example.

**Lord Thomas of Gresford:** Is there advanced training?



**Peter Stanyon:** No, it would be up to each individual returning officer, but the core training for presiding officers and poll clerks will be very similar. It will cover all of the areas that are required. The expectation tends to be that there is a two-hour training session ahead of the actual day, with tests, quizzes and the like to validate that, and other support that will come in on the day to support them, from inspectors and the like. I stress the point that they are volunteers and they have to take in an awful lot of information in a very short period of time.

Q24 **Lord Keen of Elie:** Good day, Mr Stanyon. You were present when I asked questions of the witnesses from the Electoral Commission. You may recall that I asked about expanding the list of accepted forms of ID with the aim of improving accessibility for voters. I wanted to shift the emphasis of that inquiry a little by asking you whether and to what extent expanding the list of accepted forms of identification would impose a further administrative burden on staff. If so, what sort of realistic lead-in time would you require in order to train staff with regard to such an expansion? In other words, should it be done three months in advance of the election or three days in advance of the election? Could you possibly comment on that?

**Peter Stanyon:** Yes, certainly. Any list that is expanded causes a concern, because it is more documents to check through. Certainly we have seen similar evidence as the commission have in terms of the ID that was presented at polling stations that was not acceptable. It is sensible there is a review, not just on adding but potentially removing some of the ones that were not used from the actual list to make it administratively a slightly easier burden for the staff.

As far as I am aware—this was in the commission’s report—there were three main forms of ID used in May: passport, driver’s licence and bus pass. There are 22 forms of ID on the list, so 19 were rarely used throughout that process, including the voter authority certificate, of course. The issue comes down to those ones that are in that list of 19. What do they look like? I do not know. I have looked at the list myself and would not understand what a bus pass of that form would look like unless it were shown to me. There is an obligation on both the Government and the commission to provide that resource to understand what they look like.

There was evidence. Democracy Volunteers, which oversees elections, said at a seminar it was at that there were instances of people with Commonwealth passports being turned away because they did not understand that was a Commonwealth passport. It comes back to the point with regards to the volunteers and the like.

In terms of the training and the lead-in to that, we would always argue for as long as possible, but the reality is, when it comes to the polling station, it will either be in the polling station handbook produced by the Electoral Commission for reference, or in a separate document available at the desk to allow a check: “Does that document there look like one of these ones that we have here?” That could be a training element or it

could be about having the information to hand. It could well be that it is done online. It could well be done via a mobile phone app or something like that. They are the sorts of things that would be better. It is more about just making sure there is an understanding of what they look like rather than the actual quantity of that list.

**Lord Keen of Elie:** Even just regarding a timing issue on the day of the election itself, if staff are faced with a list of 22 or even more potential forms of identification, the mere task of checking that on an individual basis takes time and therefore creates potential for backlogs of electors waiting to try to execute their vote.

**Peter Stanyon:** I visited a couple of the polling stations on 2 May. I saw that almost every single voter had in their hand, as they walked into the station, the ID. That was their passport or it was a driver's licence. That was just in the two polling stations I went into in my local authority area. The list is there for a reason. It needs to be sensibly drawn up, allowing for the accessibility of every form of elector coming through the door: young, old or whatever the case may be.

That comes down to the training element with the staff. If there is a delay at the desk for any reason, that is where the machinery moves in, to remove that person to the side to be dealt with one on one, while the rest of the process continues smoothly. If that list is lengthened and there is evidence that more and more of the 19, or whatever it might well be with an expanded list, come through, yes, that has the potential for delays. It would need to be addressed at the time as to how to limit those delays at the desk for an elector who turns up with a UK passport, for example.

**Lord Keen of Elie:** Do I understand from your earlier answer that there may in fact be a case for removing some forms of identification from the current list, simply because they are not utilised?

**Peter Stanyon:** We would say that it is about reviewing the list in total, not just reviewing to add to that list. We certainly believe that, if a review is to take place, which we believe the UK Government are doing alongside the commission, everything should be analysed because there was a good reason why it was put on that list. Is that reason still valid if we are adding more to it on that basis? We are not proposing to take all those ones off. It is, "Let us actually analyse whether they are suitable forms of ID", because that is exactly what we are doing with new forms that are coming on to the list, potentially.

Q25 **The Chair:** Just as a supplementary to that, in evidence we have received an observation was made. We have not put it on the website yet, so I will not give the source. It was that, "For the most part, the areas voting on 4 May were areas where voter ID ownership was likely to be highest". Do you think that is a fair statement? Was there a bias in the sense that it just so happened that the May elections produced higher incidence?

**Peter Stanyon:** Knowing where the elections took place, there were no scheduled polls in London, Birmingham and Bristol, which are huge conurbations. I would also argue that there were elections taking place in a lot of areas such as Kirklees, Calderdale and Preston, places where you might think there would not be high incidence. It was not just the leafy suburbs that were having elections. "Inner-city" is probably the wrong terminology, but there were areas that were significantly more urban; it was not just the rural areas. I am not totally convinced that would be the case. It is more along the lines that three big areas did not have elections.

**The Chair:** That is fine. As it had been put to us, we wanted you to be able to say whether you could confirm that.

Q26 **Lord Foulkes of Cumnock:** Mr Stanyon, you will have heard me ask the Electoral Commission about the proposal that attestation by another registered voter would be acceptable. What are your views on that?

**Peter Stanyon:** To echo very much what the commission said, we are less content with the idea because we feel that the issues that are there with the systems currently can be resolved with communications, for example bringing the business-as-usual elements into this sort of thing. We are concerned because of the admin elements within the polling station, as we have already talked about. It would add in another five forms to the 34 that are already due to be completed, for example. The issue about only being able to attest to, say, two voters in a polling station would require that checking process, which could potentially introduce delays. They are the admin concerns.

In terms of electorate concerns, it is very sensible to have a second route, albeit we would be concerned that it goes against the whole principle of voter ID from the beginning. Would it lead to people not applying, not looking for their passport, not looking to apply for a VAC, and then effectively coming into a station by default? Would that be the way it would be potentially abused? Again, a lot of work needs to be done on the practicalities, in terms of not just the positive elements for the elector but also the implications it would have in the polling stations themselves.

**Lord Foulkes of Cumnock:** You will have heard the Electoral Commission reps say that it is working in Sweden and Canada. Have you had a look at that to see how it operates there?

**Peter Stanyon:** No, we have not as an organisation looked at that, because we knew the commission was very keen on requesting that the Government consider that. The fact that they were not meant that we have not gone any further to look at those systems. We do need to look at the systems that operate in other democracies to see whether there is something that would benefit and also maintain the whole purpose and principle of the Act, which is to prevent fraud taking place.

**Lord Foulkes of Cumnock:** The reason that you are not keen on it is

because of the extra administrative burdens it would put on the polling clerks.

**Peter Stanyon:** Yes, absolutely. As things stand, there is so much more that has been brought in by the Act itself. Another burden to come in would make that, without fundamental reform of the process, a lot more difficult for the staff to cope with. Again, going back to the point, they are volunteers and they would need to manage this system alongside all the other ones going forward. That is an admin perspective. That is putting aside the benefits that are there, obviously, for the elector going forward.

Q27 **The Chair:** Is there any emerging evidence that could indicate that the voter ID requirement is driving an increase in demand for postal voting? You cannot be absolute, but are there green shoots of that?

**Peter Stanyon:** No, there has not necessarily been a major surge, certainly if I take the evidence from May. Again, a returning officer gave evidence to the committee in the other House. There was a slight increase but nowhere near the levels that you might have thought would be the case. Again, the anecdotal evidence that was given to us is that it was more driven by local political parties in their own patches, rather than people not wanting to go down that route of voter ID.

**The Chair:** Again, it is a point that came up in other evidence. I just wanted to test it with you. Lord Thomas, you are going to take us to the cumulative impacts of changes arising from the Elections Act 2022.

Q28 **Lord Thomas of Gresford:** Yes, we have covered most of this, but I would like to ask you about this. You call for a delay to the introduction of online absent voting applications until after the next election, but it was introduced by regulations that came into force on 31 October. Could you help us with the implications and why you wanted it delayed?

**Peter Stanyon:** Yes. We and many other stakeholders are very happy with the policy. It is a sensible approach to allow for online absent voting applications, but we remain of the view that it should not have been rolled out because of the limitations currently with the online system. The stated intention was that it would be an agile project, which means that changes will be made by January, which will resolve a lot of the issues that we have identified about the ability to use the system. In the meantime, that ignores all the by-elections taking place between those periods and means that those registration and returning officers are having to work around, which is causing issues.

We have opened up what we call our red-button reporting, where administrators are raising their concerns with us as to the online absent voting system. So far it has got to about 20 pages of technical issues with the actual delivery, a lot, again, coming back down to things such as the quality of photographs, which you have to cut and then bring into the system. It is not an automated system as things stand. It has also highlighted lots of issues with regards to the way the legislation has been drafted, which we felt was as a direct result of the speed of the legislation being taken through.

We have great concerns about the online applications for those residents in residential care homes, because there is not the ability for local data matching, which would be one of the routes available. National insurance numbers are not necessarily known. NHS numbers are known, but national insurance numbers are not necessarily known by care homes. Whereas under registration to vote, you can use local data to confirm the identity of an individual, that is not permitted currently under the online absent voting. It is causing a massive issue with regards to the ongoing applications made by those in residential care homes.

It has gone straight to a paper-based system. As things stand, the paper-based system is taking four times longer to process than it did before the system came into place. There is currently no bulk processing facility. They are the reasons why we stand by the fact that we are concerned it has been rolled out. That said, it is working. People are getting on and doing it. There are lots of tweaks that need to be done to the system itself.

With the committee's permission, I just wonder if it would be helpful if I quote a statement that came from one of the staff on this particular forum with regards to the compounded risk. I will not say who it is, though I do know the individual personally. The current workload pressures and worries contributed significantly to a situation she had, alongside various other issues.

She says, "We have a relatively young team in terms of experience, not necessarily age, and, to be completely honest, we do not have enough of the right skills or experiences, and confidence in terms of decision-making to manage the demands on us. A small number of senior members of the team have the most experience and knowledge. Whilst we are doing everything we can to train and develop the rest of the team, it is becoming more and more challenging, as we simply cannot keep up with the level of change and complexity that this job now entails. The team are tired, demoralised, depleted. The list of adjectives could go on. We are clearly not being listened to or taken seriously. The entire profession, including the AEA, believed it was a mistake to introduce OAVA at this particular time, yet here we are. It is launch day and it is happening."

That was a genuine response from an administrator. That is pretty typical of a lot of the conversations that we are having with that stress just coming into the job.

**Lord Thomas of Gresford:** It does not sound as if it is working.

**Peter Stanyon:** It will work. Unfortunately, the electoral administrators are a strange breed. They will make it work, but that is at severe cost to themselves.

Q29 **Lord Keen of Elie:** I just have a short point. You again heard from the witnesses of the Electoral Commission about the collection of data and their perception that, although the legislative change might be desirable

for collection in May 2024, they felt that collection would take place in any event. Do you share that confidence?

**Peter Stanyon:** Absolutely, yes, and generally all the feedback we have had supports that principle, because of the very fact that, legislatively, for the next two general elections, it must be collected in that form. The commission and the Government require that. It just becomes then part of the normal process for the staff in the polling stations. To switch it off and then switch it back on would cause far more issues than just to keep going. Legislation would help, but it is not actually a necessity in the scheme of things.

Q30 **The Chair:** You have given commentary about your organisation, and I have read your annual report. In terms of getting volunteers to staff polling stations, is it still your view that you can get the volunteers but, once they have completed the training, the dropout rate is quite high?

**Peter Stanyon:** There was some evidence of that. There is always a turnover of staff at every election, even before the Elections Act provisions came into being. There was some minor evidence of people, when they understood the change in the process with voter ID coming in, then saying, "No, I cannot actually do that". Only time will tell as we move through with the other measures that are coming, such as the handling of postal ballot papers, the limitation of proxy voters and all those things that are also part of the Act, which are coming in this time around.

Generally speaking, because voter ID was the showstopper, for all the reasons—it was very well advertised and it was very well commented on in national media—there was a perception it was going to cause the issues that we talked about with abuse and the like. That did not transpire. In the areas we know where they did have significant turnover, many of those teams have subsequently contacted the people who pulled out and said, "Are you sure you want to do that? Would you like to be re-engaged in the future or was it just a knee-jerk reaction to the scary spectre of the change to the system?" They are having success in some areas. In others they are not. It really is a fragmented approach on that one.

**The Chair:** You have articulated very clearly your view on the compound risk and the weakening of the electoral infrastructure. You are not going to get everything in your wish list before the next general election, but what would be your top three needs from Government, if you had to name the top three, in order to mitigate this compound risk, given you cannot have everything?

**Peter Stanyon:** That is a very hard question. Can I keep it to three?

**The Chair:** You can go two or you can go four.

**Peter Stanyon:** There needs to be the understanding of that compound risk. The actual programme that has been delivered has been incredibly detailed and technical. Each individual workstream within that was almost

a programme in its own right. There is the potential for a lack of understanding that what is happening in one area of the system, such as the online absent voting applications process, is bringing lots of pressure into the registration side. That then has a knock-on effect to the delivery of the election in the polling station, which sometimes does not seem to be recognised in terms of the process going forward.

It is about the openness and willingness to understand that resources are stretched. There is a need to provide whatever support and pull whatever levers the Government can, as will we, the commission and SOLACE, to assist the returning officers getting through this hump of change that is coming. That is a woolly answer about the three asks of the Government.

The big ask of the Government is to allow things to settle down, because we have had so much change over my career in electoral services. I started in 1988, and it has not stopped since the mid-1990s. Every year there has been a change that has had a significant effect on part of the process.

The other ask is not for something ahead of a general election. I speak on behalf of colleagues who expect the system to be as it is now, with very limited change, if any, for what will be delivered at the next general. We are bedding it down, getting used to that. As much as anything, it is that all the change, all the digitisation and all of the modern elements of the process have come into the electoral registration side of the system. They have not touched the election side. We have effectively made it easier for people to register to vote, which is brilliant, and made it easier for people to apply for an online absent vote, which is superb, but they have not taken the effect on the actual delivery of the poll in the polling station, which currently still sits with a stubby pencil and a piece of paper.

That is not to say we are looking at electronic votes or anything like that. It is solely that the pressures are being brought in during that period ahead of an election that will potentially lead to the election suffering itself. It is about the vision. Where are we going? That is really the bigger picture.

I wholeheartedly agree that we will not get anything like what we would like on our wish list going forwards.

**The Chair:** That is a good point. There is greater efficiency in delivering the demand for the delivery service, but you now need to make that match the efficiency at the front end.

Could I just thank you very much for your detailed answers? I know a lot of your colleagues are at the coalface and bearing the stress of this. This is coming through as quite a strong message: that it is surviving because of the commitment of individuals, recognising the job that the staff at the polling stations do. Can I just end by saying that we do recognise the work they do and how essential that work is to a functioning democracy? Let this committee put on record that we recognise the contribution that is being made. We will reflect on that in the report that we make.

**Peter Stanyon:** I will feed that back to the members. Thank you very much.

**The Chair:** Thank you very much for your evidence.