



# HOUSE OF LORDS

Select Committee on the Constitution

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By email

Dear Minister,

## **Findings of the House of Lords Constitution Committee's inquiry into the introduction of voter ID**

1. We recently conducted a preliminary inquiry into voter ID in which we considered the impact of the introduction of voter ID and lessons to be learned ahead of the next local elections in May 2024 and the forthcoming general election. The Elections Act 2022 requires the Government to continue evaluating the implementation of the voter ID policy at the next two general elections.<sup>1</sup> This letter sets out our conclusions and recommendations. The appendix provides a summary of evidence we received. Oral and written evidence is available in full on the Committee's webpage at <https://committees.parliament.uk/committee/172/constitution-committee/>.
2. During our inquiry we heard oral evidence from the Electoral Commission, the Association of Electoral Administrators, council leaders and Ipsos UK. We also received written evidence from academics, the Chief Electoral Officer for Northern Ireland, not-for-profit organisations and the Chief Executive at South Lanarkshire Council. We received the Government's commissioned assessment of the introduction of the Voter ID requirement as contained in the report from IFF Research, published on 30 November.<sup>2</sup> We are grateful to you for coming before us to give evidence on 6 December and the engagement from your department with our inquiry, and to all those who provided evidence. Thank you also for your letter of 14 December. We look forward to receiving the further information you have committed to provide in due course.
3. Access to voting is an important constitutional principle and every effort should be made to enable all those who wish to vote to do so. In 2022, in our legislative scrutiny

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<sup>1</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), p 18: [https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]; Elections Act 2022, [Schedule 1, para 7](#)

<sup>2</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023): [https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]

report on the Elections Bill we concluded that the “electoral process is of fundamental importance to the constitution”<sup>3</sup> and expressed concerns about the possible impact of voter ID on turnout.<sup>4</sup> We also recommended that the new system be trialled at the May 2023 local elections, with any problems identified and addressed before the next general election.<sup>5</sup> This letter is our contribution to that process.

4. The focus of our inquiry has been on the implementation of the voter ID policy. We have not sought to interrogate the principal merits of the policy itself. From the evidence we received, most of those eligible to vote at the May 2023 local elections were able to adhere to the policy and cast their vote. In our letter we have focussed, however, on areas that require improvement, including, for example, the impact of the policy on particular demographic groups, the potential impact on turnout at the next general election and the additional burdens placed on electoral administrators. Our conclusions and recommendations suggest how implementation might be improved to minimise any negative effects on the ability of the electorate to cast their vote at future elections.
5. The next local elections are scheduled for 2 May 2024 and the next general election must take place by 28 January 2025. In accordance with the ‘Gould’ principle, the electoral sector requests that any legislative changes are made at least six months in advance. The Electoral Commission clarified that this did not mean six months ahead of the poll but instead “six months ahead of the point at which the change will affect either the administrator or indeed the regulated audience”.<sup>6</sup> Some of our recommendations require legislative change. The window of opportunity to deliver any legislative change, consistent with that principle, before the May 2024 local elections has closed but, depending on timing, it may not have closed for the general election. Any change that is required but cannot be delivered in time for the upcoming elections should not be discarded—it is important that we work to ensure the long-term integrity of our electoral system.<sup>7</sup>

### **General conclusions**

6. The requirement to produce an accepted form of photographic ID to vote was introduced by the Election Act 2022 and is part of the Government’s Electoral Integrity Programme. That Programme has five primary objectives:
  - improve the security and integrity of the ballot;
  - improve the transparency and fairness of elections;
  - protect the democratic debate;
  - enhance engagement in UK democracy; and
  - modernise the electoral system.<sup>8</sup>

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<sup>3</sup> Constitution Committee, [Elections Bill](#) (13th Report of Session 2021–22, HL Paper 164), para 8

<sup>4</sup> Constitution Committee, [Elections Bill](#) (13th Report of Session 2021–22, HL Paper 164), para 18

<sup>5</sup> Constitution Committee, [Elections Bill](#) (13th Report of Session 2021–22, HL Paper 164), para 20

<sup>6</sup> [Q 5](#) (Craig Westwood)

<sup>7</sup> [Q 4](#) (Craig Westwood)

<sup>8</sup> Department for Levelling Up, Housing and Communities, *Evaluation for Electoral Integrity Programme: Public Opinion Research – Ipsos for DLUHC* (September 2023), para 1.4:

7. **The Committee notes these objectives but is concerned about their implementation. It has received evidence, including from yourself,<sup>9</sup> suggesting that the voter ID requirement has affected some demographic groups' propensity or opportunity to vote, in part due to a lack of awareness about the voter ID requirement and the availability of the Voter Authority Certificate. This is contrary to the Electoral Integrity Programme's stated objective of enhancing engagement in UK democracy.**

***Impact of voter ID on turnout for the next general election, including on particular demographics***

8. Turnout at general elections is generally higher (67.3 per cent at the 2019 general election) compared to local elections (approximately 30 per cent).<sup>10</sup> Electoral Commission research indicated voter ID was likely to have a greater impact at higher turnout elections such as a UK general election, where people who did not always vote at local elections may want to take part.<sup>11</sup>
9. Ipsos UK survey research found that 8 per cent of voting age adults in areas which held local elections in May 2023 said the voter ID policy made them less likely to want to vote in local elections. This rose for particular demographic groups, including those who do not own an accepted form of ID (41 per cent), those with a disability that prevents them from voting in person without assistance (22 per cent), those from ethnic minority backgrounds (15 per cent, though 13 per cent said it made them more likely to want to vote), those renting from the council / housing association (15 per cent), those renting from a private landlord (13 per cent), those who rarely or never vote in local elections (12 per cent), 18-to-34 year-olds (12 per cent), those with a disability that impacts voting in person (11 per cent), those from the most deprived areas in England (11 per cent) and 45–54 years old (10 per cent).<sup>12</sup>
10. **It is difficult to extrapolate figures from the local elections in May 2023 to determine the likely impact of voter ID on turnout at the next general election, particularly as turnout at general elections is approximately double that of local elections. However, research consistently suggests that people from particular demographic groups were negatively affected by the voter ID requirement in higher numbers than the general voting population at the May 2023 local elections. Although this was not necessarily the sole reason these groups were less likely to vote, it was likely a contributing or compounding factor.**

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1184372/Evaluation\\_of\\_Electoral\\_Integrity\\_Programme\\_Public\\_Opinion\\_Research.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1184372/Evaluation_of_Electoral_Integrity_Programme_Public_Opinion_Research.pdf) [accessed 18 December 2023]

<sup>9</sup> [Q 72](#) (Simon Hoare MP)

<sup>10</sup> House of Commons Library, *Turnout at elections*, Research Briefing, [CBP 8060](#), 10 January 2023, pp 5 and 17; [Q 18](#) (Peter Stanyon)

<sup>11</sup> Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023):

<https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]; Written evidence from Prof Toby James ([VID0005](#)), para 9

<sup>12</sup> Written evidence from Ipsos UK ([VID0010](#)); [OO 56–57](#) (Gideon Skinner); Department for Levelling Up, Housing and Communities, *Evaluation for Electoral Integrity Programme: Public Opinion Research – Ipsos for DLUHC* (September 2023), para 4.12:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1184372/Evaluation\\_of\\_Electoral\\_Integrity\\_Programme\\_Public\\_Opinion\\_Research.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1184372/Evaluation_of_Electoral_Integrity_Programme_Public_Opinion_Research.pdf) [accessed 18 December 2023]

11. **Fully funded local, tailored engagement campaigns targeting those demographic groups more likely to be negatively affected by the voter ID requirement are essential if lower turnout by particular demographics at future elections is to be avoided. If they are to be successful these campaigns must raise awareness of the availability of Voter Authority Certificates, including the process for applying and the fact that they are free of charge. This is particularly important given the particular weight the Government has attributed to the Voter Authority Certificate as a means of facilitating access to voting for those without an accepted form of ID.**

### **Awareness of voter ID requirements**

12. Public awareness of the voter ID requirement appeared to have increased considerably in England by May 2023. Ipsos reports that awareness in England rose from 34 per cent in January 2023 to 76 per cent in May 2023, following the local elections (awareness was higher in election areas, where 84 per cent had heard a great deal or a fair amount about the change). The Electoral Commission told us that public awareness was at 22 per cent before they launched their public awareness campaign and 87 per cent just ahead of polling day.<sup>13</sup> However, this does not provide an indication of awareness levels in Scotland and Wales.
13. **Awareness-raising about voter ID must be sustained until the requirement becomes ‘business as usual’ in the minds of voters across Great Britain. This will require significant investment for national campaigns produced by the Electoral Commission. This is particularly important on the lead up to the next general election where the geographical target for these campaigns will include all of England, Scotland and Wales.**
14. **We welcome the efforts of local authorities to raise awareness about the voter ID requirement at the May 2023 local elections, including the involvement of civil society organisations and other networks to engage harder-to-reach demographics. We welcome the £7.4 million of additional funding provided to local authorities for communications and recommend this is renewed. The Government should explore means by which it might better support awareness-raising campaigns with a particular view to reaching those demographics most likely to be negatively affected by the voter ID requirement. This should include sharing best practice between local authorities and leveraging the Government’s existing contact channels with those less likely to possess ID, including, for example, benefits recipients or those renting from a social landlord. We heard in your oral evidence that measures in this area are already underway—we welcome this and urge the Government to consider where awareness-raising can be improved. We look forward to hearing from you in the new year regarding communications campaigns in the lead up to the next set of polls.**

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<sup>13</sup> Department for Levelling Up, Housing and Communities, *Evaluation for Electoral Integrity Programme: Public Opinion Research – Ipsos for DLUHC* (September 2023), para 4.5: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1184372/Evaluation\\_of\\_Electoral\\_Integrity\\_Programme\\_Public\\_Opinion\\_Research.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1184372/Evaluation_of_Electoral_Integrity_Programme_Public_Opinion_Research.pdf) [accessed 18 December 2023]; [Q 1](#) (Craig Westwood); [Q 51](#) (Gideon Skinner)

## Ownership of accepted forms of ID

15. The Government has produced a definitive list of forms of photo ID that are accepted at polling stations.<sup>14</sup> According to the Government, approximately 4 per cent of people currently eligible to vote do not own a form of ID included on the list.<sup>15</sup> Electoral Commission research indicated that those renting from a social landlord, the unemployed, lower social grades, the over-85s and disabled people were less likely to have one of the accepted forms of ID.<sup>16</sup> They found that people with disabilities such as visual impairment or learning disabilities, Gypsy, Roma and Traveller communities, people living in refuges, people experiencing homelessness and the trans community had “multiple and compounding barriers” to engaging with the voter ID policy, including lower levels of ownership of ID.<sup>17</sup>
16. Following the May 2023 local elections, the Government conducted a review of the list of accepted forms of ID. It concluded that it had been unable to identify any additions to the list that would “succeed in significantly increasing coverage”, either for groups with the highest proportions of people without an accepted form of photo ID, or more generally.<sup>18</sup> It said:

“The key challenge is the diminishing return of including additional documents on the list. Research by the Government and the Electoral Commission has shown consistently that the vast majority of the electorate (96%) hold a form of photographic identification that is on the existing list. As such it is likely that a similar percentage of the holders of any potential additional document will already also hold another document that is on the current list and therefore already accepted – as such the addition would not be able to significantly increase coverage.”<sup>19</sup>

17. During oral evidence we challenged the Government on its assumption that the figure of 96% who hold at least one form of ID on the existing list could be read across to holders of any other single form of ID. We suggested the Government should instead have considered how many people with, for example, a young person’s rail card, also

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<sup>14</sup> This includes passports issued by the UK, the Channel Islands, the Isle of Man, a British Overseas Territory, an EEA state or a Commonwealth country, a driving licence issued by the UK, the Channel Islands, the Isle of Man or an EEA state (including provisional driving licences), a blue badge, a range of local travel passes, identity cards bearing the Proof of Age Standards Scheme hologram and a range of other government issued documents. The full list is available on the Electoral Commission website. Electoral Commission, ‘Accepted forms of photo ID’: <https://www.electoralcommission.org.uk/i-am-a/voter/voter-id/accepted-forms-photo-id> [accessed 4 December 2023]

<sup>15</sup> Department for Levelling Up, Housing and Communities, *Voter Identification Impact Assessment* (24 October 2022), para 11: [https://www.legislation.gov.uk/ukia/2022/105/pdfs/ukia\\_20220105\\_en.pdf](https://www.legislation.gov.uk/ukia/2022/105/pdfs/ukia_20220105_en.pdf) [accessed 18 December 2023]

<sup>16</sup> Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]; Q 1 (Craig Westwood)

<sup>17</sup> Q 1 (Craig Westwood)

<sup>18</sup> Department for Levelling Up, Housing and Communities, *Government response to Electoral Commission report on May elections* (30 November 2023): <https://www.gov.uk/government/publications/government-response-to-the-electoral-commissions-report-on-the-may-2023-local-elections/government-response-to-electoral-commission-report-on-may-elections> [accessed 18 December 2023]

<sup>19</sup> Department for Levelling Up, Housing and Communities, *Government response to Electoral Commission report on May elections* (30 November 2023): <https://www.gov.uk/government/publications/government-response-to-the-electoral-commissions-report-on-the-may-2023-local-elections/government-response-to-electoral-commission-report-on-may-elections> [accessed 18 December 2023]

had another form of ID and whether they were more likely to carry it with them. The Government acknowledged that it did not “have any direct evidence on the holders of items of identification that are on the existing list and on what else they own” and suggested this was “an interesting area for further research in the next iteration of the evaluation”.<sup>20</sup>

18. **We welcome the Government’s review of accepted forms of ID and recognise that adding to the list of accepted forms of ID might create an additional administrative burden on polling staff. While we acknowledge the Government’s conclusion that there is a diminishing return in including additional documents on the list, we do not consider this conclusion sufficiently robust in the absence of rigorous survey evidence. We urge the Department for Levelling Up, Housing and Communities to make it a priority to conduct more rigorous research into this issue. The Government should also consider adding additional forms of ID to the list that are widely available to provide more options to those who do not own an existing accepted form of ID and to those who do but will not necessarily be carrying it on polling day.**

### **Awareness of the existence of the Voter Authority Certificate**

19. Voters who lack an accepted form of ID, are unsure whether their photo ID still looks like them or are worried about using an existing form of ID for another reason (such as the use of a gender marker) have the option to apply for a free Voter Authority Certificate. This can be used at polling stations as ID.<sup>21</sup> You described the Voter Authority Certificate as a “foundation stone” of the voter ID policy.<sup>22</sup> It was estimated that 250,000 to 300,000 people would need a VAC to vote in the May 2023 elections, but only around 89,500 people applied for one.<sup>23</sup> Only 25,000 certificates were actually used to vote on polling day.<sup>24</sup> Far greater volumes of Voter Authority Certificates will need to be issued ahead of the next general election if large scale disenfranchisement of voters is to be prevented.<sup>25</sup> Yet, evaluation by IFF Research “found no evidence of local [Voter Authority Certificate] awareness campaigns being targeted at those with no accepted photographic identification.”<sup>26</sup>
20. Craig Westwood, Director of Communications, Policy and Research at the Electoral Commission, noted that if it were possible to leverage Government-owned datasets, the first step would be to use them to facilitate voter registration, without which a voter

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<sup>20</sup> [Q 85](#) (Becca Crosier)

<sup>21</sup> Electoral Commission, ‘Accepted forms of photo ID’: <https://www.electoralcommission.org.uk/i-am-a/voter/voter-id/accepted-forms-photo-id> [accessed 4 December 2023]

<sup>22</sup> [Q 73](#) (Simon Hoare MP)

<sup>23</sup> Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]

<sup>24</sup> Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]

<sup>25</sup> Written evidence from Prof Stuart Wilks-Heeg and Prof Maria Sobolewska ([VID0008](#)), para 4

<sup>26</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), pp 47–48 : [https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]

could not apply for a Voter Authority Certificate.<sup>27</sup> In order to register to vote an elector must normally provide their national insurance number, plus their name and address. The same details are required to apply for a Voter Authority Certificate.<sup>28</sup> Martha Matheou, Head of Electoral Services at the London Borough of Sutton, told us that if national insurance number verification fails the elector is required to provide documentary evidence to prove their identity. If an individual is registering to vote for the first time the process of registering and applying for a Voter Authority Certificate could become repetitive and “tiresome”.<sup>29</sup>

21. **The importance of increasing voter registration as a prerequisite to bolstering Voter Authority Certificate applications cannot be underestimated. It is vital that Voter Authority Certificate awareness-raising campaigns reach the four per cent of the population who do not own an accepted form of ID. We welcome the Government’s acknowledgement that improving awareness is a “high priority”. We look forward to hearing more from the Government about the practical steps it is taking ahead of the May 2024 local elections to increase awareness of the Voter Authority Certificate, following its meeting with the Electoral Commission on the matter.**<sup>30</sup>

### ***The application and issuing process for Voter Authority Certificates***

22. The full functionality of the Voter Authority Certificate application system was not in place when the system was launched in mid-January 2023. For electoral administrators, this meant application processing was not as efficient as it might otherwise have been and ‘manual workarounds’ had to be used.<sup>31</sup> Several updates to the system were issued between launch and the May 2023 local elections. Some of these improved the system while some caused problems, and some updates were issued very close to polling day.<sup>32</sup> We were told there was a particular risk that there would be a surge in Voter Authority Certificate applications just before the deadline ahead of a general election and a question as to whether systems would perform and electoral administrators would be able to process, print and dispatch large volumes of Voter Authority Certificates in such circumstances.<sup>33</sup> Becca Crosier, Deputy Director for Elections at the Department for Levelling Up, Housing and Communities, said the Government would continue to develop the portal until February or early March 2023, after which it was committed to a ‘digital freeze’ so as not to disrupt the ‘live process’ on the lead up to polls.<sup>34</sup> Peter Stanyon, Chief Executive at the Association of Electoral Administrators,

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<sup>27</sup> [Q 8](#) (Craig Westwood)

<sup>28</sup> [Q 33](#) (Martha Matheou)

<sup>29</sup> [Q 33](#) (Martha Matheou)

<sup>30</sup> [Q 74](#) (Simon Hoare MP)

<sup>31</sup> [Q 2](#) (Tom Hawthorn)

<sup>32</sup> [Q 2](#) (Tom Hawthorn)

<sup>33</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), p 53:

[https://assets.publishing.service.gov.uk/media/65675010312f40000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f40000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]; Written evidence from Prof Stuart Wilks-Heeg and Prof Maria Sobolewska ([VID0008](#)), paras 6–8 and 11; Written evidence from Local Government Information Unit ([VID0006](#))

<sup>34</sup> [Q 81](#) (Becca Crosier). The timing of the ‘digital freeze’ may change depending on the timing of the general election.

cautioned that the system had still not been “fully stress-tested” and it would not be until a general election takes place.<sup>35</sup>

23. **It will take a general election—when there is likely to be a significantly higher volume of applications—for the Voter Authority Certificate application system to be fully stress-tested. In the meantime, the system must be fully functional well ahead of the local elections in May 2024. We recommend that any updates to the system are well designed and fully tested well ahead of polling day and welcome the Government’s commitment to implement a ‘digital freeze’ ahead of the next set of elections to avoid disrupting the ‘live process’ on the lead up to the polls.**
24. The current deadline for Voter Authority Certificate applications is six working days before polling day. The Electoral Commission was concerned that under this rule a voter who did not own a form of accepted photo ID and only realised that on polling day or only decided they wanted to vote on polling day was effectively precluded from voting. The Commission has recommended the Government explore whether the deadline could be moved closer to polling day.<sup>36</sup> Peter Stanyon described the intention to bring the Voter Authority Certificate application deadline closer to polling day as “absolutely valid” but cautioned that in current circumstances, with so many changes being introduced to the electoral process “adding more pressure into those last few days would create a significant risk of bringing that system down”.<sup>37</sup> In its response to the Electoral Commission’s recommendations the Government concluded that the deadline of six working days ahead of polling day provided “the most accessibility for electors while ensuring local authorities can process applications and Certificates can be printed and delivered to electors in time for polling day” and said it had no plans to change the deadline.<sup>38</sup>
25. Peter Stanyon suggested that the Voter Authority Certificate could be digitised, though acknowledged that this would likely require legislative change.<sup>39</sup> This would minimise the risk of voters losing the Certificate and it would allow the deadline for application to be brought closer to polling day, as time would not have to be allowed for printing and delivery.<sup>40</sup> Despite some security concerns about the prospect of a digital Voter Authority Certificate,<sup>41</sup> Becca Crosier informed us that consideration would be given to this in the future. She said the deadline six working days before polling day was calculated to allow one day for electoral registration officers to process applications, one day for printing and four days for postal delivery. Though a digital system would remove the need for printing and delivery, it would require electoral administrators to process applications very close to polling day, at a time when they are under considerable pressure.<sup>42</sup>

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<sup>35</sup> [Q 19](#) (Peter Stanyon); Written evidence from Unlock Democracy ([VID0003](#))

<sup>36</sup> [Q 2](#) (Tom Hawthorn); Written evidence from Unlock Democracy ([VID0003](#))

<sup>37</sup> [Q 20](#) (Peter Stanyon)

<sup>38</sup> Department for Levelling Up, Housing and Communities, *Government response to Electoral Commission report on May elections* (30 November 2023): <https://www.gov.uk/government/publications/government-response-to-the-electoral-commissions-report-on-the-may-2023-local-elections/government-response-to-electoral-commission-report-on-may-elections> [accessed 18 December 2023]

<sup>39</sup> [Q 19](#) (Peter Stanyon)

<sup>40</sup> [Q 19](#) (Peter Stanyon)

<sup>41</sup> [Q 83](#) (Simon Hoare MP)

<sup>42</sup> [Q 83](#) (Simon Hoare MP, Becca Crosier)



26. **We accept that as long as Voter Authority Certificates are in physical form there are practical barriers to bringing the deadline closer to polling day, including time needed to process, print and post the forms and potential burdens on electoral administrators. Nonetheless, access to voting is an important constitutional principle and every effort should be made to engage and enable all those who wish to vote to do so. We welcome the Government’s commitment to exploring the possibility of offering digital Voter Authority Certificates as an alternative in the future and acknowledge that it is too late to implement such a change ahead of the May 2024 elections. However, doing so in the future would potentially eliminate five working days required for printing and posting the certificates, allowing the deadline to be brought closer to polling day and for the certificate to be stored on the user’s phone for easy access. We urge the Government to introduce legislation allowing for digital Voter Authority Certificates as soon as practicably possible, while ensuring the necessary security measures are in place to prevent fraud.**

### **Alternatives to presenting ID**

27. Postal votes do not require voter ID. Council leaders had noted an increase in postal vote applications, but this increase had been seen annually prior to the introduction of the voter ID requirement and so was not necessary a reaction to the new policy.<sup>43</sup> Postal votes could be accessed by those without ID but Cleland Sneddon, Chief Executive of South Lanarkshire Council, was clear that postal votes increased the demand on electoral administrators rather than reducing it.<sup>44</sup>
28. Both attestation (or “vouching”) and statutory declarations have also been recommended as additional means by which for voters to prove their identity at the polling station. The former would involve registered voters who have an accepted form of ID making an attestation on behalf of another voter who does not have an accepted form of ID.<sup>45</sup> The latter would involve permitting voters to make a statutory declaration verifying their own identity.<sup>46</sup> Both would require legislative change.<sup>47</sup> In its response to the Electoral Commission’s recommendations the Government stated its opposition to attestation because it would “undermine the integrity of the check, and risk adding time and complexity to the polling station process both to those running it, and to those using it.”<sup>48</sup>

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<sup>43</sup> [OO 33, 34](#) (Cleland Sneddon, Graham Farrant, Martha Matheou)

<sup>44</sup> [Q 33](#) (Cleland Sneddon)

<sup>45</sup> Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]; Local Government Information Unit, *The Impact of Voter ID; The Views of Administrators*, pp 36 and 40: <https://lgiu.org/wp-content/uploads/2023/09/The-impact-of-voter-ID-the-views-of-administrators.pdf> [accessed 18 December 2023]

<sup>46</sup> APPG on Democracy and the Constitution, *Voter ID – what went wrong and how to fix it – An Inquiry into the impact of photographic identification requirements at the 2023 local elections* (7 September 2023), para 64: [https://static1.squarespace.com/static/6033d6547502c200670fd98c/t/64ff05b5797e5a2707ddf3fb/169443474664\\_per\\_cent204/VID+Inquiry+Report+FINAL.pdf](https://static1.squarespace.com/static/6033d6547502c200670fd98c/t/64ff05b5797e5a2707ddf3fb/169443474664_per_cent204/VID+Inquiry+Report+FINAL.pdf) [accessed 18 December 2023]

<sup>47</sup> [Q 10](#) (Tom Hawthorn)

<sup>48</sup> Department for Levelling Up, Housing and Communities, *Government response to Electoral Commission report on May elections* (30 November 2023): <https://www.gov.uk/government/publications/government-response-to-the-electoral-commissions-report-on-the-may-2023-local-elections/government-response-to-electoral-commission-report-on-may-elections> [accessed 18 December 2023]; [Q 88](#) (Simon Hoare MP)

29. Witnesses did not support statutory declarations because they would not provide the necessary assurances regarding the voter’s identity.<sup>49</sup> Although there would be an audit trail and a record it would not in practice “provide an awful lot more assurance than the previous position before the introduction of voter ID, which is effectively to declare yourself and declare your identity before you were given a ballot paper.”<sup>50</sup>
30. **While we acknowledge the additional administrative burden that attestation would introduce, we consider it a potentially valuable means by which to make voting accessible for members of the electorate who do not own an accepted form of photo identification and are unable to obtain a Voter Authority Certificate in time. We do not consider attestation to undermine the principle of voter ID provided the number of people each voter can attest for is limited to one or two. As awareness of the Voter Authority Certificate increases, and if the application deadline were able to be brought closer to polling day, accessibility may improve. Nonetheless, we recommend the Government keeps its position on this issue under review.**
31. **We do not support the introduction of statutory declarations as an alternative to showing voter ID, as doing so would provide insufficient safeguards to uphold the integrity of a system of voter ID.**

***Impact of voter ID on the administration of the next general election, including recruitment and retention of staff***

32. Witnesses told us the electoral sector and electoral infrastructure were increasingly stretched.<sup>51</sup> Local authorities had found it increasingly difficult to recruit and retain polling station volunteers—particularly as volunteers tended to be older people—and they did not have the resources to backfill positions.<sup>52</sup> There was no central pool of election staff and it was ultimately the responsibility of each returning officer to ensure they had staffing plans in place to allow a poll to run smoothly.<sup>53</sup> Staffing became an even greater concern at a general election because—unlike in the May 2023 local elections—local authorities were unable to ‘borrow’ staff from neighbouring authorities.<sup>54</sup> Graham Farrant, Chief Executive of Bournemouth, Christchurch and Poole Council (BCP), and Cleland Sneddon told us they were looking at ways to incentivise employees to carry out election duties, and that it could reach a point in which they had to direct local authority staff to carry out this work.<sup>55</sup> Becca Crosier offered the help of civil servants to assist local authorities at polling stations, as happened in 2021.<sup>56</sup>
33. **The electoral sector operates under a concerning degree of strain, which has been exacerbated by the introduction of voter ID and other policies included**

<sup>49</sup> [Q 12](#) (Tom Hawthorn); [Q 46](#) (Graham Farrant, Cleland Sneddon)

<sup>50</sup> [Q 12](#) (Tom Hawthorn)

<sup>51</sup> Written evidence from Cleland Sneddon ([VID0002](#)), para 27; Written evidence from Prof Toby James ([VID0005](#)), para 15; Written evidence from Local Government Information Unit ([VID0006](#))

<sup>52</sup> [Q 5](#) (Craig Westwood); [Q 23](#) (Peter Stanyon); [Q 31](#) (Graham Farrant, Cleland Sneddon); Written evidence from Cleland Sneddon ([VID0002](#)), para 29; Written evidence from Prof Alistair Clark ([VID0008](#)), paras 22–23; Written evidence from Local Government Information Unit ([VID0006](#))

<sup>53</sup> [Q 9](#) (Tom Hawthorn)

<sup>54</sup> [Q 5](#) (Craig Westwood); [Q 31](#) (Graham Farrant, Martha Matheou); [Q 41](#) (Cleland Sneddon); Written evidence from Local Government Information Unit ([VID0006](#))

<sup>55</sup> [Q 31](#) (Graham Farrant, Cleland Sneddon); Written evidence from Prof Alistair Clark ([VID0008](#)), para 39

<sup>56</sup> [Q 90](#) (Becca Crosier)

**in the Elections Act 2022. We are concerned that the extra burden of these requirements may make it more difficult for returning officers to administer, within the time available, the preparation and conduct of elections, and to recruit and retain polling station staff, requiring the mandation of council staff to carry out election duties. We urge the Government to explore means by which it can assist returning officers in ensuring they have adequate staff and resources available to deliver on the lead up to elections and on polling day itself. We welcome the Government’s commitment to offer returning officers support from civil servants.**

34. We were told that the electoral sector was making contingency plans for three potential scenarios regarding the timing of the next general election: a general election before the planned May 2024 polls; a general election combined with the May 2024 polls; and a general election after the May 2024 polls.<sup>57</sup> A key concern was the possibility of the next general election being combined with the May 2024 local elections<sup>58</sup>—a scenario that may only become clear five or six weeks ahead of polling day. This would have serious implications for the ability of administrative staff to ensure key resources (including sufficient staff) and processes were in place.<sup>59</sup> Local authorities in Scotland and Wales and approximately one-third of local authorities in England did not run elections with voter ID in May 2023 and therefore lacked experience in this area.<sup>60</sup>
35. **Local elections will take place in May 2024 for councils and mayors in England and Police and Crime Commissioners in England and Wales. It is conceivable that the next general election might also take place on the same day. Doing so could present an increased risk to the delivery of, and confidence in, all polls scheduled for that day. We are particularly concerned about the impact this would have on the administration of polls in Wales and areas of England that have no former experience administering the voter ID policy. In Wales voters will be expected to present voter ID for the general election but not for local elections, which risks causing further confusion.**
36. Electoral management system software suppliers, paper suppliers, printers and Royal Mail all play a fundamental role in the delivery of elections.<sup>61</sup> The Electoral Commission told us they engaged with these actors themselves and through returning officers at the local level to see how they could support their processes. They also engaged at Chief Executive level with Royal Mail to ensure priority was given to electoral material, as did the Government.<sup>62</sup>
37. **We urge the Government and the Electoral Commission to continue to engage with Royal Mail and other contractors to ensure delivery of materials key to the successful conduct of elections is prioritised on the lead up to polling day.**
38. There were not significant reported cases of staff abuse in response to the voter ID policy following the May 2023 local elections.<sup>63</sup> Returning officers told us they had a

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<sup>57</sup> [Q 7](#) (Craig Westwood); [Q 22](#) (Peter Stanyon)

<sup>58</sup> [Q 22](#) (Peter Stanyon); Written evidence from Prof Alistair Clark ([VID0008](#)), para 37

<sup>59</sup> [Q 9](#) (Craig Westwood); [Q 22](#) (Peter Stanyon)

<sup>60</sup> [Q 21](#) (Peter Stanyon); Written evidence from Local Government Information Unit ([VID0006](#))

<sup>61</sup> [Q 13](#) (Craig Westwood)

<sup>62</sup> [Q 13](#) (Craig Westwood); [Q 83](#) (Simon Hoare MP)

<sup>63</sup> [Q 5](#) (Craig Westwood)

single point of contact with their local police forces specifically for elections.<sup>64</sup> The Electoral Commission worked with police forces and the National Police Chiefs' Council to ensure they were ready to respond to any disturbances and continued to do so.<sup>65</sup>

39. **We welcome the work the Electoral Commission has undertaken with police and the National Police Chiefs' Council to ensure they are ready to respond to disturbances at polling stations in response to the voter ID requirement. We recommend this continues for future polls.**
40. The Department for Levelling Up, Housing and Communities had provided 'New Burdens' funding for local authorities implementing the voter ID policy.<sup>66</sup> This consisted of £25 million of funding to local authorities to implement changes introduced by the Elections Act 2022, £14 million of which was for voter ID. Local authorities could also make a 'justification-led bid' for additional funding if they could demonstrate need. Further funding was due to become available in April 2024 for further implementation of the Elections Act 2022. For voter ID, the May 2023 polls were costed based on likely numbers of Voter Authority Certificate applications and the need for additional core staff. For a general election full funding would be made available "in the usual way".<sup>67</sup>
41. The cost burden of delivering elections was an issue raised by witnesses.<sup>68</sup> Costs arising from the voter ID policy included: printing and distributing Voter Authority Certificates, purchasing privacy screens, mirrors and stationery, and delivering additional training.<sup>69</sup> While Graham Farrant said 'new burdens funding' paid for initial purchases, he was concerned that future replacement costs might fall on the local authority.<sup>70</sup> Martha Matheou said that in London—where there were no local elections in May 2023—it was difficult to predict where the increases in cost would occur.<sup>71</sup>
42. **While the 'new burdens' funding and the availability of 'justification-led bids' to local authorities implementing voter ID is welcome, these funds must not be limited to initial costs. We recommend that the Department for Levelling Up, Housing and Communities maintains funding for future costs associated with voter ID.**

### ***The cumulative impact of changes to the voting system***

43. The May 2024 local elections and the next general election will take place under a much-amended legal framework. The cumulative changes introduced by the Elections Act 2022 added additional "layers of complexity" and "compound risk" for election administrators.<sup>72</sup> Graham Farrant said the changes introduced by the Elections Act 2022

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<sup>64</sup> [Q 45](#) (Graham Farrant, Cleland Sneddon, Martha Matheou)

<sup>65</sup> [QQ 5, 9](#) (Craig Westwood)

<sup>66</sup> [QQ 71, 79](#) (Simon Hoare MP); Department for Levelling Up, Housing and Communities, *Elections Act New Burdens funding methodology: voter identification and accessibility* (8 December 2022): <https://www.gov.uk/government/publications/elections-act-new-burdens-funding-methodology-voter-identification-and-accessibility/elections-act-new-burdens-funding-methodology-voter-identification-and-accessibility> [accessed 18 December 2023]

<sup>67</sup> [Q 79](#) (Becca Crosier)

<sup>68</sup> [Q 32](#) (Martha Matheou); [Q 44](#) (Cleland Sneddon)

<sup>69</sup> [Q 44](#) (Cleland Sneddon, Graham Farrant)

<sup>70</sup> [Q 44](#) (Graham Farrant)

<sup>71</sup> [Q 44](#) (Martha Matheou)

<sup>72</sup> [Q 5](#) (Craig Westwood); [Q 18](#) (Peter Stanyon)

were “adding more and more modern processes on to what is fundamentally and old-fashioned system”.<sup>73</sup> Other witnesses agreed and thought a fundamental review of the electoral process would be a better approach.<sup>74</sup> Graham Farrant was concerned that the additional burdens introduced by the Elections Act 2022 would cause problems, particularly in elections where margins were very tight.<sup>75</sup> Cleland Sneddon described the existing elections system as one with “little resilience and limited contingency capacity.” He was concerned that the changes introduced by the Elections Act 2022 were “adding to the demands on the limited resources when local authorities’ own resources, which must be made available to the Returning Officer, are already over committed.”<sup>76</sup>

- 44. The decision to introduce multiple changes to the electoral system simultaneously or in quick succession has placed a significant burden on a system with limited resilience and has introduced increased risk to the successful delivery of elections. Scheduling the next general election ahead of the May 2024 local elections or combining a general election with the local elections could exacerbate this risk.**

#### *The adequacy of data collection*

45. Concerns arose about the reliability of data at polling stations that employed ‘greeters’.<sup>77</sup> Greeters may have informed voters about the voter ID requirement before they reached the polling station itself, which may have caused voters to turn away without being counted. The Electoral Commission acknowledged this, while also noting that legislation specifically asked for the data to be split between polling stations that employed greeters and those who did not. This resulted in a slight difference in data—those polling stations that did employ greeters had a slightly lower number of people recorded as having been initially turned away compared to those polling stations that did employ greeters.<sup>78</sup> Graham Farrant said that, in the case of BCP Council, where greeters told somebody about the ID requirement and that person turned back, that was recorded. However, greeters were not the only reason to question the reliability of data collected at polling stations. Data would not have been recorded if a teller or a candidate told somebody about the voter ID requirement.<sup>79</sup> BCP councillors reported conversations they had on the doorstep in which people said they could not vote because they did not have an accepted form of ID.<sup>80</sup> These people would not have been recorded in polling station data.
46. At the May 2023 local elections there was a legal requirement for local authorities to provide data relating to voter ID,<sup>81</sup> though this did not include a duty to collect data regarding awareness of the voter ID requirement and Voter Authority Certificate across different demographic groups.<sup>82</sup> There was no statutory requirement for returning

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<sup>73</sup> [Q 47](#) (Graham Farrant)

<sup>74</sup> [Q 47](#) (Graham Farrant, Cleland Sneddon, Martha Matheou); Written evidence from Prof Toby James ([VID0005](#)), para 17

<sup>75</sup> [Q 47](#) (Graham Farrant)

<sup>76</sup> Written evidence by Cleland Sneddon ([VID0002](#)), para 36

<sup>77</sup> Written evidence from Unlock Democracy ([VID0003](#)); Written evidence from Prof Stuart Wilks-Heeg and Prof Maria Sobolewska ([VID0008](#)), para 20; Written evidence from Democracy Volunteers ([VID0007](#))

<sup>78</sup> [Q 15](#) (Tom Hawthorn)

<sup>79</sup> [Q 49](#) (Graham Farrant)

<sup>80</sup> [OO 33. 35](#) (Graham Farrant)

<sup>81</sup> [Q 14](#) (Tom Hawthorn)

<sup>82</sup> [Q 18](#) (Peter Stanyon)

officers to collect data at the May 2024 elections, but there was such a requirement for the next two general elections.<sup>83</sup> There was nonetheless a strong consensus across electoral administrators that returning officers should continue to collect data, including where there was no statutory requirement to do so.<sup>84</sup> The Electoral Commission and the Association of Electoral Administrators thought a change in legislation to make data collection compulsory at local elections would be helpful but not essential.<sup>85</sup>

47. **We note that polling station data collection is incapable of recording those who for whatever reason do not enter a polling station. We acknowledge public opinion surveys by the Electoral Commission, Ipsos and others may go some way in rectifying this issue but is unlikely to present a full picture.**
48. **We are disappointed the Government has decided against making data collection on the impact of voter ID compulsory for local elections. While we recognise concerns that doing so would increase the burden on elections staff, the Government is working with the Electoral Commission to clarify the data collection process and make it more efficient. In addition, there is strong consensus among electoral administrators that returning officers should continue to collect data. We urge the Government to reconsider its decision and introduce legislative change to this effect as soon as possible.**

Given the short timeline ahead of the May elections and the unknown timing of the upcoming general election, we would be grateful to receive a response by Friday 9 February.

Yours sincerely,



Baroness Drake CBE  
Chair of the Constitution Committee

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<sup>83</sup> [Q 14](#) (Tom Hawthorn)

<sup>84</sup> [Q 14](#) (Tom Hawthorn); [Q 29](#) (Peter Stanyon); [Q 48](#) (Cleland Sneddon, Graham Farrant)

<sup>85</sup> [Q 14](#) (Tom Hawthorn); [Q 29](#) (Peter Stanyon)

## Appendix: Summary of evidence

### *Impact of voter ID on turnout for the next general election, including on particular demographics*

1. At the May 2023 elections 0.25 per cent (or 14,000 people) were turned away because they did not have an accepted form of ID and did not later return with accepted ID.<sup>86</sup> This data was not reliable because, in addition to the 14,000 people who were turned away and did not return, it was impossible to know how many people did not come to the polling station at all during because they lacked an accepted form of ID.<sup>87</sup> We were told that councillors from Bournemouth, Christchurch and Poole (BCP) reported conversations they had on the doorstep in which people said they could not vote because they did not have an accepted form of ID.<sup>88</sup> A similar proportion of potential voters were turned away and did not return in the parliamentary by-elections that took place in July and October.<sup>89</sup>
2. Electoral Commission research found that approximately 4 per cent of all people who said they did not vote at the May 2023 local elections did not do so because of the voter ID requirement—3 per cent said they did not have an accepted form of ID and 1 per cent said they did not agree with the requirement.<sup>90</sup> Ipsos UK research found that (from a base size of 73) 4 per cent of non-voters in election areas said voter ID was one of the reasons they were not able to vote in May 2023—2 per cent said they did not have photo ID, 1 per cent said they did not agree or felt uncomfortable with the requirement, 1 per cent said they could not find their photo ID and a small number of other reasons were given. This 4 per cent of non-voters:
  - Tended to be less likely to vote in elections (only 5 per cent said they always vote in local elections versus 47 per cent of all those in local election areas);
  - Were less satisfied generally with the process of voting at elections (30 per cent versus 70 per cent of all those in local election areas) and were less confident that the recent local elections were well run (53 per cent versus 79 per cent);
  - In most cases (57 per cent) another reason for not voting was also given, such as not wanting to vote for any of the parties / candidates running (16 per cent), feeling there was no point in voting (16 per cent), not trusting politicians/councillors (16 per cent), not knowing which way to vote (11 per cent);

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<sup>86</sup> [Q 1](#) (Craig Westwood); Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]

<sup>87</sup> Written evidence from Prof Toby James ([VID0005](#)), para 5

<sup>88</sup> [QQ 33, 35](#) (Graham Farrant)

<sup>89</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), p 10: [https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]

<sup>90</sup> Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]

- Were more likely to feel that the voter ID requirement made it more difficult to vote in person in the local elections (76 per cent, versus 12 per cent overall) and made them less likely to want to vote (79 per cent versus 8 per cent overall).
  - Were less likely to have accepted forms of ID such as a passport (38 per cent, versus 84 per cent overall) or a driving licence (33 per cent, versus 82 per cent overall). Overall, 37 per cent of this group said they had none of the accepted forms of ID, versus 2 per cent overall in local election areas.<sup>91</sup>
3. The percentage of non-voters who said voter ID was one of the reasons they were not able to vote in May 2023 was higher among social renters (8 per cent), people in the West Midlands (8 per cent), people living in the most deprived quintile areas (7 per cent), those with a disability that has an impact on them voting in person (8 per cent), those without photo ID (36 per cent) and those dissatisfied with the voting process (11 per cent).<sup>92</sup>
  4. Electoral Commission research suggests that 1 per cent of non-voters did not vote because they went to vote without the required ID. However, this increased to 5 per cent among 18-to-24 year old non-voters and non-voters from a mixed or black ethnic background.<sup>93</sup> Cleland Sneddon noted that if a voter turned up at polling station very late on polling day without an accepted form of ID it might not be possible for them to go home to retrieve their ID and return to the polling station before polls close.<sup>94</sup>
  5. Witnesses were generally cautious about anticipating the impact of voter ID on turnout at the next general election.<sup>95</sup> However, Democracy Volunteers calculated that if one were to assume the same turnout at the next general election as at the 2019 general election (67.3 per cent), and an electorate of 47,000,000, the number of voters turned away for not having an accepted form of ID and who did not later return could be approximately 79,000.<sup>96</sup> The Electoral Commission said its research “indicates that the voter ID requirement is likely to have a larger impact at higher turnout elections such as a UK general election, where people who do not always vote at local elections may want to take part.”<sup>97</sup> Eighty-four per cent of people who said they did not tend to vote at local elections were aware of the voter ID requirement compared to 94 per cent of those who vote more frequently at local elections. People who never vote in local elections were less likely to have an accepted form of ID (7 per cent) than those who always vote in local elections (2 per cent).<sup>98</sup>

<sup>91</sup> Written evidence from Ipsos UK ([VID0010](#))

<sup>92</sup> Written evidence from Ipsos UK ([VID0010](#))

<sup>93</sup> Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]

<sup>94</sup> [Q 42](#) (Cleland Sneddon)

<sup>95</sup> Written evidence from Cleland Sneddon ([VID0002](#)), para 25

<sup>96</sup> Written evidence from Unlock Democracy ([VID0003](#))

<sup>97</sup> Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]; Written evidence from Prof Toby James ([VID0005](#)), para 9

<sup>98</sup> Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]



6. Ipsos UK found that 8 per cent of voting age adults in areas who held local elections in May 2023 said the voter ID policy made them less likely to want to vote in local elections. This rose to:
- 10 per cent of 45–54 year-olds;
  - 11 per cent of people from the most deprived areas in England;
  - 11 per cent of those with a disability that impacts voting in person;
  - 12 per cent of 18-to-34 year-olds;
  - 12 per cent of those who rarely or never vote in local elections;
  - 13 per cent of people renting from a private landlord;
  - 15 per cent of people renting from the council / housing association;
  - 15 per cent of those from ethnic minority backgrounds (though 13 per cent said it made them more likely to want to vote);
  - 22 per cent of those with a disability that prevents them from voting in person without assistance;
  - 41 per cent of those who do not own an acceptable form of ID.<sup>99</sup>
7. However, it is important to note that while voter ID was a reason given for being less likely to want to vote, other reasons were also given, such as being likely to be away, political apathy and lack of trust in politicians.<sup>100</sup> It is also notable that of the eight per cent of voting age adults who said the voter ID requirement made them less likely to want to vote, 47 per cent did vote, while 50 per cent did not. Among those who did not vote, something related to the voter ID requirement was the most cited reason (25 per cent), followed by apathy (not wanting to vote for any of the parties / candidates) (23 per cent), there was no point in voting because it made no difference (18 per cent) and not being interested in local politics (16 per cent). Nine per cent mentioned something related to the voter ID requirement as the only reason for not voting.<sup>101</sup> It was therefore not possible to conclude from Ipsos UK's research that voter ID was the primary or sole reason that this eight per cent were less likely to want to vote.<sup>102</sup> Nonetheless, as noted by Cleland Sneddon it was important to ensure that voter ID did not become an additional barrier to certain demographics voting.<sup>103</sup>
8. Ipsos UK found that 36 per cent of people who lack an accepted form of photo ID and who did not vote said this was because of something to do with voter ID. Approximately 8 per cent of council renters and 7 per cent of those from more deprived areas said they did not vote because of something to do with voter ID.<sup>104</sup> An

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<sup>99</sup> Written evidence from Ipsos UK ([VID0010](#)); [QQ 56–57](#) (Gideon Skinner); Department for Levelling Up, Housing and Communities, *Evaluation for Electoral Integrity Programme: Public Opinion Research – Ipsos for DLUHC* (September 2023), para 4.12:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1184372/Evaluation\\_of\\_Electoral\\_Integrity\\_Programme\\_Public\\_Opinion\\_Research.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1184372/Evaluation_of_Electoral_Integrity_Programme_Public_Opinion_Research.pdf) [accessed 18 December 2023]

<sup>100</sup> [Q 55](#) (Gideon Skinner)

<sup>101</sup> Written evidence from Ipsos UK ([VID0010](#))

<sup>102</sup> [Q 55](#) (Gideon Skinner); Written evidence from Ipsos UK ([VID0010](#)); Written evidence from Prof Alistair Clark ([VID0004](#)), para 14

<sup>103</sup> [Q 43](#) (Cleland Sneddon)

<sup>104</sup> [Q 61](#) (Gideon Skinner)

online survey conducted by Dr Kit Colliver and Dr Ash Stokoe raised concerns about the impact of the voter ID policy on trans people, noting that “participants expressed significant anxiety that their photo ID could be challenged when voting in person.” Twenty-five per cent of participants said they were less likely to vote in a future general election under the new voter ID policy.<sup>105</sup>

9. IFF Research conducted an evaluation of the Electoral Integrity Programme on behalf of the Department for Levelling Up, Housing and Communities. It concluded:

“[T]he evidence is consistent for voting age adults with accepted photographic identification in suggesting that the introduction of the voter identification requirements did not have any impact on their voting experience. The findings suggest that the requirement could have the highest impact on the likelihood to vote on voting age adults who do not have an accepted photographic identification document. While the incidence rate of voting age adults with no photographic identification is low, over four in ten of these adults (41%) indicated that the new photographic voter identification requirement made them less likely to vote (Public Opinion Survey Wave 2). The low awareness of VACs ... may be a contributing factor affecting the motivation of those without accepted photographic identification to vote, as they may perceive the process of obtaining an accepted photographic identification to be too complicated or expensive.”<sup>106</sup>

10. IFF Research also reported that “[s]ome electoral administrators identified targeted communications work as a focus for improvement for the next UK Parliamentary General Election.” There was particular interest in ensuring the message reached voters from ethnic minority groups, students and disabled people (such as those with visual impairments who would not see posters in the local area).<sup>107</sup>

11. **It is difficult to extrapolate figures from the local elections in May 2023 to determine the likely impact of voter ID on turnout at the next general election, particularly as turnout at general elections is approximately double that of local elections. However, research consistently suggests that people from particular demographic groups were negatively affected by the voter ID requirement in higher numbers than the general voting population at the May 2023 local elections. Although this was not necessarily the sole reason these groups were less likely to vote, it was likely a contributing or compounding factor.**

12. ***Fully funded local, tailored engagement campaigns targeting those demographic groups more likely to be negatively affected by the voter ID requirement are essential if lower turnout by particular demographics at future elections is to be avoided. If they are to be successful these campaigns must raise awareness of the***

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<sup>105</sup> Written evidence from Dr Kit Colliver and Dr Ash Stokoe ([VID0009](#))

<sup>106</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), p 66:  
[https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]

<sup>107</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), p 41:  
[https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]

**availability of Voter Authority Certificates, including the process for applying and the fact that they are free of charge. This is particularly important given the particular weight the Government has attributed to the Voter Authority Certificate as a means of facilitating access to voting for those without an accepted form of ID.**

#### Awareness of voter ID requirements

13. Public awareness of the voter ID requirement appears to have increased considerably in England by May 2023. Ipsos reports that awareness in England rose from 34 per cent in January 2023 to 76 per cent in May 2023, following the local elections (awareness was higher in election areas, where 84 per cent had heard a great deal or a fair amount about the change). The Electoral Commission told us that public awareness was at 22 per cent before they launched their public awareness campaign and 87 per cent just ahead of polling day.<sup>108</sup> However, this does not provide an indication of awareness levels in Scotland and Wales.
14. The increase in public awareness was largely due to awareness raising material produced by the Electoral Commission ahead of the poll, which was praised by witnesses.<sup>109</sup> The Commission’s resources for disabled people and the work it did to inform civil society organisations about the voter ID requirement were particularly welcomed.<sup>110</sup> Despite this, awareness was much lower among particular demographic groups (see paragraph 19 below).
15. For the majority of the population—who own an accepted form of ID and just need to remember to bring it on polling day—advertising campaigns worked.<sup>111</sup> Peter Stanyon thought voter ID needed to become “business as usual” and this was likely to take time:

“we need to go through a four or five-year cycle of parliamentary elections, [Greater London Authority] elections and [Police and Crime Commissioner] elections.”<sup>112</sup>
16. This was echoed by the Electoral Office for Northern Ireland, who said the voter ID system in Northern Ireland was “both accepted and expected”, and suspected concerns about the policy in Great Britain “may be short-term and with good communication the public in Great Britain will get used to voter identification”.<sup>113</sup>
17. The Electoral Commission told us that the awareness raising campaign for the May 2023 elections cost it approximately £5 million but the cost for a general election could be significantly more due to wider geographical area that would have to be covered (including Scotland and Wales).<sup>114</sup> Witnesses thought that funding should be made

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<sup>108</sup> Department for Levelling Up, Housing and Communities, *Evaluation for Electoral Integrity Programme: Public Opinion Research – Ipsos for DLUHC* (September 2023), para 4.5:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1184372/Evaluation\\_of\\_Electoral\\_Integrity\\_Programme\\_Public\\_Opinion\\_Research.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1184372/Evaluation_of_Electoral_Integrity_Programme_Public_Opinion_Research.pdf) [accessed 18 December 2023]; [Q 1](#) (Craig Westwood); [Q 51](#) (Gideon Skinner)

<sup>109</sup> [Q 31](#) (Cleland Sneddon); [QQ 31, 32](#) (Martha Matheou); [Q 35](#) (Graham Farrant); Written evidence from Prof Stuart Wilks-Heeg and Prof Maria Sobolewska ([VID0008](#)), para 3

<sup>110</sup> [Q 32](#) (Martha Matheou)

<sup>111</sup> [Q 1](#) (Craig Westwood)

<sup>112</sup> [Q 18](#) (Peter Stanyon)

<sup>113</sup> Written evidence from the Chief Electoral Officer for Northern Ireland ([VID0001](#))

<sup>114</sup> [Q 5](#) (Craig Westwood)

available to sustain awareness-raising efforts for subsequent elections, and potentially for some time.<sup>115</sup> Simon Hoare MP, Minister for Local Government at the Department for Levelling Up, Housing and Communities also considered it necessary to have information campaigns “every year” amplifying the range of accepted forms of ID and the existence of the Voter Authority Certificate.<sup>116</sup> Becca Crosier told us the Government had increased the amount the Electoral Commission could spend on campaigning and provided £7.4 million of funding to councils to support local awareness-raising as a supplement to the national campaigns launched by the Electoral Commission.<sup>117</sup>

18. Graham Farrant said that in his experience it was very difficult to engage people about voter requirements until an election had been called.<sup>118</sup> Cleland Sneddon suggested that a television representation of a voter going through the process of showing photo ID to vote would be helpful in reaching those groups less likely to have photo ID,<sup>119</sup> though there was “no point” broadcasting this months before polling day—it should be a week or two weeks before.<sup>120</sup>
19. While the increase in public awareness was a welcome achievement, awareness of the voter ID requirement was lower among certain groups, including:
- young people;
  - some people from ethnic minority backgrounds;
  - those less likely to be interested in and engaged with politics;<sup>121</sup>
  - those from areas that did not hold local elections in May 2023;<sup>122</sup>
  - people with no photo ID;
  - those who rarely or never vote at local elections<sup>123</sup>; and
  - those from more deprived areas.<sup>124</sup>

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<sup>115</sup> [Q 1](#) (Craig Westwood); Written evidence from Unlock Democracy ([VID0003](#)); Written evidence from Democracy Volunteers ([VID0007](#)); Written evidence from Local Government Information Unit ([VID0006](#))

<sup>116</sup> [QQ 73, 77](#) (Simon Hoare MP)

<sup>117</sup> [Q 74](#) (Becca Crosier)

<sup>118</sup> [Q 32](#) (Graham Farrant); Written evidence from Prof Alistair Clark ([VID0004](#)), para 4

<sup>119</sup> This was reinforced by Ipsos UK, who said TV and radio have the broadest reach. [Q 60](#) (Gideon Skinner)

<sup>120</sup> [Q 35](#) (Cleland Sneddon)

<sup>121</sup> [Q 51](#) (Gideon Skinner); Department for Levelling Up, Housing and Communities, *Evaluation for Electoral Integrity Programme: Public Opinion Research – Ipsos for DLUHC* (September 2023), para 4.6: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1184372/Evaluation\\_of\\_Electoral\\_Integrity\\_Programme\\_Public\\_Opinion\\_Research.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1184372/Evaluation_of_Electoral_Integrity_Programme_Public_Opinion_Research.pdf) [accessed 18 December 2023]

<sup>122</sup> [Q 52](#) (Glenn Gottfried)

<sup>123</sup> Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]; Department for Levelling Up, Housing and Communities, *Evaluation for Electoral Integrity Programme: Public Opinion Research – Ipsos for DLUHC* (September 2023), p 18: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1184372/Evaluation\\_of\\_Electoral\\_Integrity\\_Programme\\_Public\\_Opinion\\_Research.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1184372/Evaluation_of_Electoral_Integrity_Programme_Public_Opinion_Research.pdf) [accessed 18 December 2023]

<sup>124</sup> 23 per cent of people in the most deprived areas said they did not know very much or anything about the voter ID requirement, compared with 17 per cent overall. [Q 59](#) (Gideon Skinner)

There was therefore more work to be done to achieve universal public awareness.<sup>125</sup>

20. With respect to those from areas that did not hold local elections in May 2023, Ipsos UK told us that during wave 2 of their survey (conducted in May 2023, after the local elections), 84% of respondents in areas that held local elections said they knew a great deal or a fair amount about the need to show photo ID to vote, versus 15% who said they knew not very much or nothing at all. That compared to 81% who knew a great deal or a fair amount and 17% who knew not very much or nothing at all in areas that did not hold local elections in May 2023. It is important to note the voter ID elements of Wave 2 of Ipsos UK’s survey was conducted in England only.
21. The challenge was in reaching audiences who were less likely to own photo ID and who were less likely to vote. In these cases, local authorities played a very important role due to their reach in local communities.<sup>126</sup> Civil society groups also proved effective in reaching people most likely to face challenges in adhering to the policy.<sup>127</sup> Martha Matheou spoke about the need to assess demographics in a particular area and, depending on needs, decide how best to target people with awareness-raising materials.<sup>128</sup> Council leaders told us about the “bespoke arrangements” they used to reach groups less likely to be engaged with the voter ID requirement, including by drawing on existing relationships with the Gypsy and Traveller community, and networks of youth organisations, housing and homelessness officers and faith leaders.<sup>129</sup> Simon Hoare MP and Becca Crosier recognised the role Government could play in sharing this kind of best practice between local authorities.<sup>130</sup> In May 2023 local authorities that did not have elections sent their staff to neighbouring authorities that did have elections in order to shadow and learn from them.<sup>131</sup>
22. Other innovative awareness-raising methods were used, such as printing voter ID requirements on pharmacy bags and visiting local groups likely to be affected by the policy change, including disability and LGBT groups.<sup>132</sup> It was considered important to evaluate the impact of these awareness raising mechanisms and evolve the approach if necessary.<sup>133</sup> The Electoral Commission expressed disappointment that the UK Government had not been as supportive of communications activity as they might have hoped. They suggested that unemployed people could be better reached via jobcentre communications channels or benefits statements, for example.<sup>134</sup>
23. While the electorate who voted in the May 2023 local elections had been through this process once and were more likely to be aware that they will require voter ID at future polls, a significant portion of the population in England and almost the entire populations of Scotland and Wales had not had that experience.<sup>135</sup> The message would be particularly challenging in Scotland and Wales, where they would need to communicate

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<sup>125</sup> [Q 31](#) (Graham Farrant)

<sup>126</sup> [Q 1](#) (Craig Westwood); [Q 18](#) (Peter Stanyon)

<sup>127</sup> [QQ 1, 3](#) (Craig Westwood); [Q 18](#) (Peter Stanyon)

<sup>128</sup> [Q 32](#) (Martha Matheou)

<sup>129</sup> [Q 35](#) (Martha Matheou, Cleland Sneddon, Graham Farrant)

<sup>130</sup> [Q 75](#) (Simon Hoare MP, Becca Crosier)

<sup>131</sup> [Q 93](#) (Becca Crosier)

<sup>132</sup> Written evidence from Local Government Information Unit ([VID0006](#))

<sup>133</sup> [Q 35](#) (Martha Matheou)

<sup>134</sup> [QQ 1, 3](#) (Craig Westwood)

<sup>135</sup> [Q 18](#) (Peter Stanyon)

the voter ID requirement for some polls but not others.<sup>136</sup><sup>137</sup> There could also be a challenge in Northern Ireland, where photographic voter ID has been required for all elections for some time, in that voters might confuse the accepted forms of ID for elections in Great Britain with those required in Northern Ireland. Northern Ireland has a separate list of accepted ID and its own Electoral Identity Card, all of which must include date of birth (unlike, for instance, the GB Voter Authority Certificate).<sup>138</sup>

24. **Awareness-raising about voter ID must be sustained until the requirement becomes ‘business as usual’ in the minds of voters across Great Britain. This will require significant investment for national campaigns produced by the Electoral Commission. This is particularly important on the lead up to the next general election where the geographical target for these campaigns will include all of England, Scotland and Wales.**
  
25. **We welcome the efforts of local authorities to raise awareness about the voter ID requirement at the May 2023 local elections, including the involvement of civil society organisations and other networks to engage harder-to-reach demographics. We welcome the £7.4 million of additional funding provided to local authorities for communications and recommend this is renewed. The Government should explore means by which it might better support awareness-raising campaigns with a particular view to reaching those demographics most likely to be negatively affected by the voter ID requirement. This should include sharing best practice between local authorities and leveraging the Government’s existing contact channels with those less likely to possess ID, including, for example, benefits recipients or those renting from a social landlord. We heard in your oral evidence that measures in this area are already underway—we welcome this and urge the Government to consider where awareness-raising can be improved. We look forward to hearing from you in the new year regarding communications campaigns in the lead up to the next set of polls.**

#### *Ownership of accepted forms of ID*

26. The Government has produced a definitive list of forms of photo ID that are accepted at polling stations.<sup>139</sup> According to the Government, approximately 4 per cent of people currently eligible to vote do not own a form of ID included on the list.<sup>140</sup> Electoral

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<sup>136</sup> [Q 18](#) (Peter Stanyon)

<sup>137</sup> In England voter ID is required for UK parliamentary elections, including general elections, by-elections and recall petitions, for local elections and by-elections, and for Police and Crime Commissioner elections. In Scotland voter ID is required for UK parliamentary elections, including general elections, by-elections and recall petitions. In Wales voter ID is required for UK parliamentary elections, including general elections, by-elections and recall petitions and for Police and Crime Commissioner elections. Electoral Commission, ‘Voter ID’: <https://www.electoralcommission.org.uk/i-am-a/voter/voter-id> [accessed 8 December 2023]

<sup>138</sup> Written evidence from the Chief Electoral Officer for Northern Ireland ([VID0001](#))

<sup>139</sup> This include passports issued by the UK, the Channel Islands, the Isle of Man, a British Overseas Territory, an EEA state or a Commonwealth country, a driving licence issued by the UK, the Channel Islands, the Isle of Man or an EEA state (including provisional driving licences), a blue badge, a range of local travel passes, identity cards bearing the Proof of Age Standards Scheme hologram and a range of other government issued documents. The full list is available on the Electoral Commission website. Electoral Commission, ‘Accepted forms of photo ID’: <https://www.electoralcommission.org.uk/i-am-a/voter/voter-id/accepted-forms-photo-id> [accessed 4 December 2023]

<sup>140</sup> Department for Levelling Up, Housing and Communities, *Voter Identification Impact Assessment* (24 October 2022), para 11: [https://www.legislation.gov.uk/ukia/2022/105/pdfs/ukia\\_20220105\\_en.pdf](https://www.legislation.gov.uk/ukia/2022/105/pdfs/ukia_20220105_en.pdf) [accessed 8 December 2023]

Commission research indicated that those renting from a social landlord, the unemployed, lower social grades, the over-85s and disabled people were less likely to have one of the accepted forms of ID.<sup>141</sup> They found that people with disabilities such as visual impairment or learning disabilities, Gypsy, Roma and Traveller communities, people living in refuges, people experiencing homelessness and the trans community had “multiple and compounding barriers” to engaging with the voter ID policy, including lower levels of ownership of ID.<sup>142</sup>

27. Other witnesses pointed to several anomalies in the existing list of accepted forms of ID. For example, a Merseytravel 60+ travel pass was not accepted but a London Oyster 60+ card was, despite the checks involved in issuing these travel passes being “essentially identical”. An expired South African passport was accepted, whereas a current Zimbabwean passport was not because Zimbabwe was no longer in the Commonwealth.<sup>143</sup> It was also suggested that the list of accepted forms of ID did not allow for equality between IDs issued to older and younger people.<sup>144</sup> In addition, it was reported that people had arrived at polling stations with NHS and other public sector work passes expecting them to be accepted.<sup>145</sup>
28. It has been widely recommended that the list of accepted forms of ID should be reviewed, and many witnesses thought additional forms of ID should be added.<sup>146</sup> Several witnesses said this should focus on increasing accessibility for those groups less likely to have an accepted form of photo ID.<sup>147</sup> Graham Farrant favoured adding forms of ID including local NHS, police and local authority photo identification. He was also in favour of accepting digital forms of ID, which he thought younger people might be more likely to carry with them, though Martha Matheou expressed security concerns about this proposition.<sup>148</sup> Graham Farrant posed the question as to whether the Government could afford a greater degree of discretion to local authorities as to whether they

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<sup>141</sup> Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]; [Q 1](#) (Craig Westwood)

<sup>142</sup> [Q 1](#) (Craig Westwood)

<sup>143</sup> Written evidence from Prof Stuart Wilks-Heeg and Prof Maria Sobolewska ([VID0008](#)), para 18

<sup>144</sup> Written evidence from Democracy Volunteers ([VID0007](#))

<sup>145</sup> [Q 33](#) (Graham Farrant); Written evidence from Local Government Information Unit ([VID0006](#))

<sup>146</sup> Association of Electoral Administrators, *AEA 2023 Post Polls Review – Under pressure: increased demand on the UK electoral system* (June 2023), paras 3.45–3.50: <https://www.aea-elections.co.uk/wp-content/uploads/2023/06/AEA-2023-Post-Polls-Report-27-June-2023.pdf> [accessed 18 December 2023];

Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023):

<https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]; Local Government Information Unit, *The Impact of Voter ID: The Views of Administrators*, pp 36 and 40: <https://lgiu.org/wp-content/uploads/2023/09/The-impact-of-voter-ID-the-views-of-administrators.pdf> [accessed 18 December 2023];

APPG on Democracy and the Constitution, *Voter ID – what went wrong and how to fix it An Inquiry into the impact of photographic identification requirements at the 2023 local elections* (7 September 2023), para 67:

[https://static1.squarespace.com/static/6033d6547502c200670fd98c/t/64ff05b5797e5a2707ddf3fb/169443474664\\_per+cent204/VID+Inquiry+Report+FINAL.pdf](https://static1.squarespace.com/static/6033d6547502c200670fd98c/t/64ff05b5797e5a2707ddf3fb/169443474664_per+cent204/VID+Inquiry+Report+FINAL.pdf) [accessed 18 December 2023];

Written evidence from Unlock Democracy ([VID0003](#)); Written evidence from Prof Stuart Wilks-Heeg and Prof Maria Sobolewska ([VID0008](#)), para 15; Written evidence from Prof Alistair Clark ([VID0008](#)), para 47; Written evidence from Local Government Information Unit ([VID0006](#)); Written evidence from Democracy Volunteers ([VID0007](#))

<sup>147</sup> [Q 8](#) (Tom Hawthorn); [Q 33](#) (Graham Farrant)

<sup>148</sup> [Q 36](#) (Graham Farrant, Martha Matheou)

should accept additional forms of photo ID widely used in that area.<sup>149</sup> This was not supported by Simon Hoare MP.<sup>150</sup>

29. Other witnesses were more cautious about adding additional forms of photo ID to the list. Cleland Sneddon thought that, if public sector ID were to be added, it would be a challenge to maintain an accurate list. Taking NHS photo ID as an example, he noted that there are multiple different NHS boards in Scotland, some of which had different formats for photo ID.<sup>151</sup> This point was echoed by Becca Crosier, who also raised security concerns about adding workplace ID to the list of accepted forms of ID.<sup>152</sup> Cleland Sneddon thought public sector employees were likely already to own an accepted form of ID, so adding their work ID to the list would not necessarily solve the problem. However, he was against reducing the list as he thought doing so would create further barriers to people voting.<sup>153</sup>
30. Peter Stanyon cautioned that, from an administrative point of view, an expanded list might cause an additional burden because it created a greater variety of documents for election officials to recognise and check.<sup>154</sup> He said it was important that any forms of photo ID added to the list were easily understood by polling station staff.<sup>155</sup> He thought it important that any review also considered whether any documents should be removed from the list. Three forms of ID were mainly used during the May 2023 local elections: passports, driving licences and bus passes. This left 19 forms of accepted ID that were rarely used.<sup>156</sup> Martha Matheou was also concerned about expanding the list. Polling staff would have to spend considerable time consulting documents to determine whether the ID a voter presented was acceptable.<sup>157</sup>
31. IFF reported that polling station staff felt “less confident” explaining to electors the criteria which determined which forms of photo ID were accepted: “This posed a minor challenge on polling day, when electors presented an identification document that was not accepted (for example NHS or police staff ID, firearms licences or young persons’ Oyster or rail card) and polling station staff felt less confident explaining why it could not be accepted.”<sup>158</sup> One polling station staff member gave IFF the following account:

“So, I had a nurse on their way, probably a thirteen-hour shift, called in and then said look, I haven't got time to go back home again. She's just assumed that the NHS ID would have been sufficient and the same with the police officer so I could understand

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<sup>149</sup> [Q 36](#) (Graham Farrant)

<sup>150</sup> [Q 87](#) (Simon Hoare MP)

<sup>151</sup> [Q 33, 36](#) (Cleland Sneddon)

<sup>152</sup> [Q 86](#) (Becca Crosier)

<sup>153</sup> [Q 36](#) (Cleland Sneddon)

<sup>154</sup> [Q 24](#) (Peter Stanyon)

<sup>155</sup> [Q 8](#) (Tom Hawthorn)

<sup>156</sup> [Q 24](#) (Peter Stanyon)

<sup>157</sup> [Q 36](#) (Martha Matheou)

<sup>158</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), p 35:

[https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]



their frustrations. But then it's kind of where do you draw the line? What work ID ... would you then have to stop at?"<sup>159</sup>

32. Following the May 2023 local elections, the Government conducted a review of the list of accepted forms of ID. It was clear that the list needed to be “manageable by staff in polling stations”. It considered several potential additions to the list, which were “highlighted as ideas through qualitative research” or “previously considered or piloted”. These included National Rail Cards, additional types of Oyster Card and Police Warrant Cards.<sup>160</sup>

33. The Government concluded that it had been unable to identify any additions to the list that would “succeed in significantly increasing coverage”, either for groups with the highest proportions of people without and accepted form of photo ID, or more generally.<sup>161</sup> It said:

“The key challenge is the diminishing return of including additional documents on the list. Research by the Government and the Electoral Commission has shown consistently that the vast majority of the electorate (96%) hold a form of photographic identification that is on the existing list. As such it is likely that a similar percentage of the holders of any potential additional document will already also hold another document that is on the current list and therefore already accepted – as such the addition would not be able to significantly increase coverage.”<sup>162</sup>

34. During oral evidence we challenged the Government on its assumption that the figure of 96% who hold at least one form of ID on the existing list could be read across to holders of any other single form of ID. We suggested the Government should instead have considered how many people with, for example, a young person’s rail card, also had another form of ID and whether they were more likely to carry it with them. The Government acknowledged that it did not “have any direct evidence on the holders of items of identification that are on the existing list and on what else they own” and suggested this was “an interesting area for further research in the next iteration of the evaluation”.<sup>163</sup>

**35. We welcome the Government’s review of accepted forms of ID and recognise that adding to the list of accepted forms of ID might create an additional administrative burden on polling staff. While we acknowledge the**

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<sup>159</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), p 36:

[https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]

<sup>160</sup> Department for Levelling Up, Housing and Communities, *Government response to Electoral Commission report on May elections* (30 November 2023): <https://www.gov.uk/government/publications/government-response-to-the-electoral-commissions-report-on-the-may-2023-local-elections/government-response-to-electoral-commission-report-on-may-elections> [accessed 18 December 2023]

<sup>161</sup> Department for Levelling Up, Housing and Communities, *Government response to Electoral Commission report on May elections* (30 November 2023): <https://www.gov.uk/government/publications/government-response-to-the-electoral-commissions-report-on-the-may-2023-local-elections/government-response-to-electoral-commission-report-on-may-elections> [accessed 18 December 2023]

<sup>162</sup> Department for Levelling Up, Housing and Communities, *Government response to Electoral Commission report on May elections* (30 November 2023): <https://www.gov.uk/government/publications/government-response-to-the-electoral-commissions-report-on-the-may-2023-local-elections/government-response-to-electoral-commission-report-on-may-elections> [accessed 18 December 2023]

<sup>163</sup> [Q 85](#) (Becca Crosier)

**Government’s conclusion that there is a diminishing return in including additional documents on the list, we do not consider this conclusion sufficiently robust in the absence of rigorous survey evidence. We urge the Department for Levelling Up, Housing and Communities to make it a priority to conduct more rigorous research into this issue. The Government should also consider adding additional forms of ID to the list that are widely available to provide more options to those who do not own an existing accepted form of ID and to those who do but will not necessarily be carrying it on polling day.**

#### Awareness of the existence of the Voter Authority Certificate

36. Voters who lack an accepted form of ID, are unsure whether their photo ID still looks like them or are worried about using an existing form of ID for another reason (such as the use of a gender marker) have the option to apply for a free Voter Authority Certificate. This can be used at polling stations as ID.<sup>164</sup> Simon Hoare MP described the Voter Authority Certificate as a “foundation stone” of the voter ID policy.<sup>165</sup>
37. There was room for improvement when it came to awareness and use of Voter Authority Certificates. The Electoral Commission told us that awareness of the availability of the Voter Authority Certificate stood at 57 per cent just prior to polling day in May 2023, whereas Ipsos UK survey data placed awareness of the availability of Voter Authority Certificates at 21 per cent in May 2023.<sup>166</sup><sup>167</sup> It was estimated that 250,000 to 300,000 people would need a Voter Authority Certificate to vote in the May 2023 elections, but only around 89,500 people applied for one.<sup>168</sup> Only 25,000 certificates were actually used to vote on polling day.<sup>169</sup>
38. Evaluation by IFF Research “found no evidence of local [Voter Authority Certificate] awareness campaigns being targeted at those with no accepted photographic identification.” It suggested:

“Future evaluative work could monitor the design, reach and impact of [Voter Authority Certificate] messaging for the UK Parliamentary General Election to assess effectiveness more thoroughly. Local authorities’ electoral services teams and the Electoral Commission should also be encouraged to place greater emphasis on raising

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<sup>164</sup> The Electoral Commission, ‘Accepted forms of photo ID’: <https://www.electoralcommission.org.uk/i-am-a/voter/voter-id/accepted-forms-photo-id> [accessed 4 December 2023]

<sup>165</sup> [Q 73](#) (Simon Hoare MP)

<sup>166</sup> [Q 1](#) (Craig Westwood); Department for Levelling Up, Housing and Communities, *Evaluation for Electoral Integrity Programme: Public Opinion Research – Ipsos for DLUHC* (September 2023), para 2.5: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1184372/Evaluation\\_of\\_Electoral\\_Integrity\\_Programme\\_Public\\_Opinion\\_Research.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1184372/Evaluation_of_Electoral_Integrity_Programme_Public_Opinion_Research.pdf) [accessed 18 December 2023]

<sup>167</sup> This discrepancy may be the result of using different wording in the question asked, different scales, different geographical coverage, or different timing of the fieldwork. For example, Ipsos UK used a four-point scale including “a great deal”, “a fair amount”, “not very much” or “nothing at all”, as well as don’t know / prefer not to say. [Q 52](#) (Gideon Skinner); Written evidence from Ipsos UK ([VID0010](#))

<sup>168</sup> Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]

<sup>169</sup> Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]

awareness for VAC, if they are not already. Raising awareness in the general population of electors will also increase the likelihood of those who need a [Voter Authority Certificate] hearing about them (through the ‘snowballing’ effect). As such, national and local campaigns should consider communications that put the option of [Voter Authority Certificate] at the forefront of their messaging.”<sup>170</sup>

39. Simon Hoare MP recognised there was “work to be done” in increasing awareness of the Voter Authority Certificate’s existence. He was confident this could be achieved in the timeframe available.<sup>171</sup>
40. Low take-up could be explained by several factors, including lack of awareness, the lower perceived salience of local elections and the increased likelihood that those who vote at local elections already have an accepted form of ID. However, Professor Stuart Wilks-Heeg and Professor Maria Sobolewska argued that this “should not distract from the challenge that lies ahead. VACs will need to be issued in far greater volumes if large scale disenfranchisement of voters is to be prevented at the next general election.”<sup>172</sup>
41. As only 4 per cent of people eligible to vote lack an accepted form of ID, it was important that the correct people were targeted by campaigns seeking to raise awareness about the Voter Authority Certificate.<sup>173</sup> Martha Matheou said in London there was work to be done to understand which demographics needed a Voter Authority Certificate and work out “borough by borough and ward by ward” how to support those individuals.<sup>174</sup>
42. Witnesses were open to the possibility that datasets already owned by the Government—such as lists of benefits recipients—could be leveraged to help increase take-up of Voter Authority Certificates,<sup>175</sup> though Simon Hoare MP cautioned that data protection concerns would preclude this.<sup>176</sup> However, he thought “there could be banner advertising on the DWP website, full deployment of promotion in GOV.UK, and posters in jobcentres”, as well as information in doctors’ and dentists’ surgeries.<sup>177</sup> He and Becca Crosier also pointed to party-political campaigning literature, which was likely to include information on the voter ID requirement and poll cards, which were obliged to include this information, along with the list of accepted ID and information about the Voter Authority Certificate.<sup>178</sup>
43. Craig Westwood noted that if it were possible the first step would be to leverage Government-owned datasets to facilitate voter registration, without which a voter could not apply for a Voter Authority Certificate.<sup>179</sup> In order to register to vote an elector must normally provide their national insurance number, plus their name and address.

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<sup>170</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), pp 47–48:

[https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]

<sup>171</sup> [Q 76](#) (Simon Hoare MP)

<sup>172</sup> Written evidence from Prof Stuart Wilks-Heeg and Prof Maria Sobolewska ([VID0008](#)), para 4

<sup>173</sup> [QQ 1, 3](#) (Craig Westwood)

<sup>174</sup> [Q 32](#) (Martha Matheou)

<sup>175</sup> [Q 8](#) (Craig Westwood); Written evidence from Prof Alistair Clark ([VID0004](#)), paras 5–6

<sup>176</sup> [QQ 73, 74](#) (Simon Hoare MP)

<sup>177</sup> [QQ 73, 74](#) (Simon Hoare MP, Becca Crosier)

<sup>178</sup> [QQ 79, 80](#) (Simon Hoare MP, Becca Crosier)

<sup>179</sup> [Q 8](#) (Craig Westwood)

The same details are required to apply for a Voter Authority Certificate.<sup>180</sup> Martha Matheou told us that if national insurance number verification fails the elector is required to provide documentary evidence to prove their identity. If an individual is registering to vote for the first time the process of registering and applying for a Voter Authority Certificate could become repetitive and “tiresome”.<sup>181</sup>

44. In its response to the Electoral Commission’s recommendations on voter ID the Government said:

“It is the Government’s view that the Voter Authority Certificate has the significant role to play in ensuring the accessibility of this policy for electors ... The evidence in the IFF Evaluation report shows that while awareness of the Voter Authority Certificate has increased, awareness remains low across all groups, including those without accepted identification (awareness of the Voter Authority Certificate was 21% among voting age adults in May, 26% among those with no accepted photographic identification). Continuing to improve this awareness by close working between Government, the Electoral Commission, civil society organisations and local authorities to target Voter Authority Certificate communications at those electors who may benefit most is a high priority.”<sup>182</sup>

45. **The importance of increasing voter registration as a prerequisite to bolstering Voter Authority Certificate applications cannot be underestimated. It is vital that Voter Authority Certificate awareness-raising campaigns reach the four per cent of the population who do not own an accepted form of ID. We welcome the Government’s acknowledgement that improving awareness is a “high priority”. We look forward to hearing more from the Government about the practical steps it is taking ahead of the May 2024 local elections to increase awareness of the Voter Authority Certificate, following its meeting with the Electoral Commission on the matter.**<sup>183</sup>

*The application and issuing process for Voter Authority Certificates*

46. Most Voter Authority Certificate applications were completed via an online portal, though they could be completed face-to-face in local authority offices.<sup>184</sup> If done via the online portal, the voter had to upload their photograph and confirm their registration details, including by normally providing their national insurance number.<sup>185</sup> If the information was validated the government-procured printer produced the document, which was then sent to the voter. There were some challenges faced by voters who lacked the internet connectivity or computer skills to successfully apply,<sup>186</sup> and for those who opted to apply face-to-face via the ‘paper route’ there was potential for a delay in

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<sup>180</sup> [Q 33](#) (Martha Matheou)

<sup>181</sup> [Q 33](#) (Martha Matheou)

<sup>182</sup> Department for Levelling Up, Housing and Communities, *Government response to Electoral Commission report on May elections* (30 November 2023): <https://www.gov.uk/government/publications/government-response-to-the-electoral-commissions-report-on-the-may-2023-local-elections/government-response-to-electoral-commission-report-on-may-elections> [accessed 18 December 2023]

<sup>183</sup> [Q 74](#) (Simon Hoare MP)

<sup>184</sup> [Q 19](#) (Peter Stanyon)

<sup>185</sup> [Q 33](#) (Martha Matheou)

<sup>186</sup> Written evidence from Prof Stuart Wilks-Heeg and Prof Maria Sobolewska ([VID0008](#)), para 14; Written evidence from Local Government Information Unit ([VID0006](#))

receiving the Voter Authority Certificate.<sup>187</sup> Nonetheless, the public-facing element of the Voter Authority Certificate application process was considered effective and simple<sup>188</sup> and IFF Research concluded that “electors who want a Voter Authority Certificate and are eligible are able to obtain one”.<sup>189</sup>

47. There were some challenges for electoral administrators using the system to produce Voter Authority Certificates. The full functionality of the application system was not in place when the system was launched in mid-January 2023. For electoral administrators, this meant application processing was not as efficient as it might otherwise have been and ‘manual workarounds’ had to be used.<sup>190</sup> Peter Stanyon told us that issues arose around photographs that did not meet the standards required. For example, photographs in which the background was not clear were rejected by some registration officers, which meant having to chase individuals to obtain a new photograph. Other registration officers might have accepted the same photo on pragmatic grounds, particularly as it got closer to polling day.<sup>191</sup> IFF Research also identified non-compliant photographs as “the main challenge for processing applications”. It noted that while an accepted Voter Authority Certificate application took 2.5 weekdays (with the submission day counting as one day) to reach an outcome, rejected applications took 20.2 weekdays to reach an outcome.<sup>192</sup>
48. Several updates to the system were issued between launch and the May 2023 local elections. Some of these improved the system while some caused problems, and some updates were issued very close to polling day.<sup>193</sup> For example, the system went down in some areas because of a new ‘patch’, which meant no applications could take place for 24 hours.<sup>194</sup> Peter Stanyon said that any amendments to the system needed to be risk-assessed outside of major election periods.<sup>195</sup>
49. Further improvements have taken place since May 2023 and Peter Stanyon described it as “a far more usable system”.<sup>196</sup> However, to the best of his knowledge, the system was still not providing all the functionality required by registration officers “such as statistical reporting and understanding the number of applications and where they are in the process”.<sup>197</sup> Becca Crosier, said the Government would continue to develop the portal until February or early March 2023, after which it was committed to a ‘digital freeze’ so as not to disrupt the ‘live process’ on the lead up to polls.<sup>198</sup> Peter Stanyon cautioned

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<sup>187</sup> [Q 19](#) (Peter Stanyon)

<sup>188</sup> [Q 19](#) (Peter Stanyon)

<sup>189</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), p 53:

[https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]

<sup>190</sup> [Q 2](#) (Tom Hawthorn)

<sup>191</sup> [Q 19](#) (Peter Stanyon)

<sup>192</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), p 54:

[https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]

<sup>193</sup> [Q 2](#) (Tom Hawthorn)

<sup>194</sup> [Q 20](#) (Peter Stanyon)

<sup>195</sup> [Q 20](#) (Peter Stanyon)

<sup>196</sup> [Q 19](#) (Peter Stanyon); [Q 81](#) (Becca Crosier)

<sup>197</sup> [Q 20](#) (Peter Stanyon)

<sup>198</sup> [Q 81](#) (Becca Crosier). The timing of the ‘digital freeze’ may change depending on the timing of the general election.

that the system had still not been “fully stress-tested” and it would not be until a general elections takes place.<sup>199</sup> There was a particular risk that there would be a surge in Voter Authority Certificate applications just before the deadline ahead of a general election and a question as to whether systems would perform and electoral administrators would be able to process, print and dispatch large volumes of Voter Authority Certificates in such circumstances.<sup>200</sup> IFF Research also noted uncertainty as to whether local authorities would be able to manage the greater demand for Voter Authority Certificates ahead of a general election.<sup>201</sup>

**50. It will take a general election—when there is likely to be a significantly higher volume of applications—for the Voter Authority Certificate application system to be fully stress-tested. In the meantime, the system must be fully functional well ahead of the local elections in May 2024. We recommend that any updates to the system are well designed and fully tested well ahead of polling day and welcome the Government’s commitment to implement a ‘digital freeze’ ahead of the next set of elections to avoid disrupting the ‘live process’ on the lead up to the polls.**

51. The current deadline for Voter Authority Certificate applications is six working days before polling day. The Electoral Commission was concerned that under this rule a voter who did not own a form of accepted photo ID and only realised that on polling day or only decides they want to vote on polling day was effectively precluded from voting. The Commission has recommended the Government explore whether the deadline could be moved closer to polling day.<sup>202</sup> Graham Farrant said people had described applying for a Voter Authority Certificate as “a long process to go through ‘just to be able to vote’”. For many people, doing this two weeks before polling day seemed a lot of trouble.<sup>203</sup> He was in favour of bringing the deadline “as close to election day as possible, so long as we have a reliable system of distribution”.<sup>204</sup>

52. However, Tom Hawthorn, Head of Policy at the Electoral Commission, cautioned that the “workability” of this proposal would have to be thoroughly tested to prevent electoral administrators from being “overwhelmed by applications they cannot process” and to ensure that the voter could receive the VAC in time to vote.<sup>205</sup> Peter Stanyon described the intention to bring the Voter Authority Certificate application deadline closer to polling day as “absolutely valid” but cautioned that in current circumstances, with so many changes being introduced to the electoral process “adding more pressure into those last few days would create a significant risk of bringing that system down”.<sup>206</sup> Martha Matheou was concerned that a deadline closer to polling day might jeopardise local authorities’ ability to deliver Voter Authority Certificates to voters in time for

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<sup>199</sup> [Q 19](#) (Peter Stanyon); Written evidence from Unlock Democracy ([VID0003](#))

<sup>200</sup> Written evidence from Prof Stuart Wilks-Heeg and Prof Maria Sobolewska ([VID0008](#)), paras 6–8 and 11; Written evidence from Local Government Information Unit ([VID0006](#)),

<sup>201</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), p 53:

[https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]

<sup>202</sup> [Q 2](#) (Tom Hawthorn); Written evidence from Unlock Democracy ([VID0003](#))

<sup>203</sup> [Q 33](#) (Graham Farrant)

<sup>204</sup> [Q 35](#) (Graham Farrant)

<sup>205</sup> [Q 2](#) (Tom Hawthorn)

<sup>206</sup> [Q 20](#) (Peter Stanyon)

polling day. She was not against exploring the possibility of bringing the deadline closer to polling day in the future but thought the voter ID policy needed to “bed in” first.<sup>207</sup>

53. Peter Stanyon noted that there were mitigations in place if there were a failure to deliver a Voter Authority Certificate on time. There was the possibility of reissuing the Certificate or, in some circumstances, emergency proxy voting at the polling station.<sup>208</sup>

54. In its response to the Electoral Commission’s recommendations the Government said:

“The deadline of six working days ahead of a poll continues to provide the most accessibility for electors while ensuring local authorities can process applications and Certificates can be printed and delivered to electors in time for polling day. The Government has no plans to change this deadline at present ... The rules around emergency proxies were therefore amended as part of the voter identification regulations to add reasons related to voter identification on to the list of justifications for an emergency proxy application. If, therefore, an elector loses their identification, or if it is stolen, destroyed or damaged beyond use, after the deadline for applications for a Voter Authority Certificate, the ERO has the ability (up until the close of polls) to allow the appointment of an emergency proxy for that polling day.”<sup>209</sup>

55. In Northern Ireland, voters who applied for a Voter Identification Card were provided with a “plastic card with a picture, name and date of birth”. The application involved an attestation process by a third party making it “akin to a passport”. As such, it was used as a form of ID by banks, airlines and others.<sup>210</sup> Peter Stanyon told us that the electoral community initially expected the Voter Authority Certificate to be a “driver’s licence-type card”. However, the decision was made to use paper certificates valid for ten years as they were easier to produce.<sup>211</sup>

56. Witnesses were concerned about whether a piece of paper would last ten years without being thrown away. This would mean people having to go through the application process again.<sup>212</sup> Peter Stanyon suggested that the Voter Authority Certificate could be digitised, though acknowledged that this would likely require legislative change.<sup>213</sup> This would minimise the risk of voters losing the Certificate and it would allow the deadline for application to be brought closer to polling day, as time would not have to be allowed for printing and delivery.<sup>214</sup>

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<sup>207</sup> [QQ 33, 35](#) (Martha Matheou)

<sup>208</sup> [Q 20](#) (Peter Stanyon)

<sup>209</sup> Department for Levelling Up, Housing and Communities, *Government response to Electoral Commission report on May elections* (30 November 2023): <https://www.gov.uk/government/publications/government-response-to-the-electoral-commissions-report-on-the-may-2023-local-elections/government-response-to-electoral-commission-report-on-may-elections> [accessed 18 December 2023]

<sup>210</sup> Written evidence from Chief Electoral Officer for Northern Ireland ([VID0001](#)), pp 1–2; Written evidence from Local Government Information Unit ([VID0006](#))

<sup>211</sup> [Q 19](#) (Peter Stanyon); [Q 2](#) (Tom Hawthorn); Written evidence from Pro Stuart Wilks-Heeg and Prof Maria Sobolewska ([VID0008](#)), para 10; [Q 76](#) (Simon Hoare MP)

<sup>212</sup> [Q 19](#) (Peter Stanyon); [Q 33](#) (Martha Matheou); Written evidence from Unlock Democracy ([VID0003](#)); Written evidence from Professor Stuart Wilks-Heeg and Prof Maria Sobolewska ([VID0008](#)), para 10; Written evidence from Professor Alistair Clark ([VID0004](#)), paras 9–11

<sup>213</sup> [Q 19](#) (Peter Stanyon)

<sup>214</sup> [Q 19](#) (Peter Stanyon)

57. Despite some security concerns about the prospect of a digital Voter Authority Certificate,<sup>215</sup> Becca Crosier informed us that consideration would be given to this in the future. She said the deadline six working days before polling day was calculated to allow one day for electoral registration officers to process applications, one day for printing and four days for postal delivery. Though a digital system would remove the need for printing and delivery, it would require electoral administrators to process applications very close to polling day, at a time when they are under considerable pressure.<sup>216</sup>
58. **We accept that as long as Voter Authority Certificates are in physical form there are practical barriers to bringing the deadline closer to polling day, including time needed to process, print and post the forms and potential burdens on electoral administrators. Nonetheless, access to voting is an important constitutional principle and every effort should be made to engage and enable all those who wish to vote to do so. We welcome the Government’s commitment to exploring the possibility of offering digital Voter Authority Certificates as an alternative in the future and acknowledge that it is too late to implement such a change ahead of the May 2024 elections. However, doing so in the future would potentially eliminate five working days required for printing and posting the certificates, allowing the deadline to be brought closer to polling day and for the certificate to be stored on the user’s phone for easy access. We urge the Government to introduce legislation allowing for digital Voter Authority Certificates as soon as practicably possible, while ensuring the necessary security measures are in place to prevent fraud.**

#### *Alternatives to presenting ID*

59. Postal votes do not require voter ID. Council leaders had noted an increase in postal vote applications, but this increase had been seen annually prior to the introduction of the voter ID requirement and so was not necessary a reaction to the new policy.<sup>217</sup> Postal votes could be accessed by those without ID but Cleland Sneddon was clear that postal votes increased the demand on electoral administrators rather than reducing it.<sup>218</sup>
60. Both attestation (or “vouching”) and statutory declarations have also been recommended as additional means by which for voters to prove their identity at the polling station. The former would involve registered voters who have accepted ID making an attestation on behalf of another voter who does not have an accepted form

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<sup>215</sup> [Q 83](#) (Simon Hoare MP)

<sup>216</sup> [Q 83](#) (Simon Hoare MP, Becca Crosier)

<sup>217</sup> [QQ 33, 34](#) (Cleland Sneddon, Graham Farrant, Martha Matheou)

<sup>218</sup> [Q 33](#) (Cleland Sneddon)



of ID.<sup>219</sup> The latter would involve permitting voters to make a statutory declaration verifying their own identity.<sup>220</sup> Both would require legislative change.<sup>221</sup>

61. The Electoral Commission thought attestation could be key for voters who only decided to vote very close to polling day or only realised at the last minute that they needed photographic ID to vote. Attestation would ensure voting remained accessible to those people while maintaining safeguards around the process. It would be limited to one or two voters on behalf of each person,<sup>222</sup> and Graham Farrant thought they should live at the same address or be from the same family.<sup>223</sup> Attestation as a way of proving identity was already used in other parts of the election process in the UK—for example, in relation to applications for Voter Authority Certificates and in some cases for absent vote applications.<sup>224</sup> In Canada, where attestation is available, it used by approximately 1 per cent of voters.<sup>225</sup>
62. However, witnesses were concerned by the administrative burden of attestation, citing yet more additional forms and checking processes.<sup>226</sup> Some witnesses thought the issues around ownership of voter ID and awareness of the voter ID policy were better resolved with effective communications, making the requirement ‘business as usual’.<sup>227</sup> Several amendments to introduce attestation were tabled during the passage of the Elections Bill through Parliament but were not supported by the Government, who thought it would undermine the principle of voter ID.<sup>228</sup> This was a view shared by some witnesses.<sup>229</sup>
63. In its response to the Electoral Commission’s recommendations the Government repeated its opposition to attestation:

“We do not believe there is a practical way to assure the attestation process in the polling station, that it would undermine the integrity of the check, and risk adding time and complexity to the polling station process both to those running it, and to those using it. The Government believes that the availability of the Voter Authority Certificate and the new rules regarding the use of an emergency proxy on grounds

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<sup>219</sup> The Electoral Commission, *Report on the May 2023 local elections in England* (13 September 2023): <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/elections-and-referendums/our-reports-and-data-past-elections-and-referendums/report-may-2023-local-elections-england> [accessed 18 December 2023]; Local Government Information Unit, *The Impact of Voter ID: The Views of Administrators*, pp 36 and 40: <https://lgiu.org/wp-content/uploads/2023/09/The-impact-of-voter-ID-the-views-of-administrators.pdf> [accessed 18 December 2023]

<sup>220</sup> APPG on Democracy and the Constitution, *Voter ID – what went wrong and how to fix it – An Inquiry into the impact of photographic identification requirements at the 2023 local elections* (7 September 2023), para 64: [https://static1.squarespace.com/static/6033d6547502c200670fd98c/t/64ff05b5797e5a2707ddf3fb/169443474664\\_per\\_cent204/VID+Inquiry+Report+FINAL.pdf](https://static1.squarespace.com/static/6033d6547502c200670fd98c/t/64ff05b5797e5a2707ddf3fb/169443474664_per_cent204/VID+Inquiry+Report+FINAL.pdf) [accessed 18 December 2023]

<sup>221</sup> [Q 10](#) (Tom Hawthorn)

<sup>222</sup> [Q 10](#) (Tom Hawthorn)

<sup>223</sup> [Q 46](#) (Graham Farrant)

<sup>224</sup> [Q 10](#) (Tom Hawthorn)

<sup>225</sup> Written evidence from Prof Toby James ([VID0005](#)), para 10; [Q 10](#) (Tom Hawthorn)

<sup>226</sup> [Q 26](#) (Peter Stanyon); [Q 46](#) (Cleland Sneddon); Written evidence from Cleland Sneddon ([VID0002](#)), paras 23 and 24; [Q 12](#) (Tom Hawthorn); [Q 46](#) (Martha Matheou)

<sup>227</sup> [Q 26](#) (Peter Stanyon); [Q 46](#) (Martha Matheou)

<sup>228</sup> [Q 10](#) (Tom Hawthorn). For example, see [Elections Bill: Marshalled list of amendments to be moved in committee of the whole house](#) [Bill 96—I (2021–22)–EN], amendment 78; HL Deb, 21 March 2022, [col 711](#)

<sup>229</sup> [Q 26](#) (Peter Stanyon); [Q 46](#) (Martha Matheou)

relating to voter identification provide sufficient options for electors who are unable to provide an accepted form of photographic identification.”<sup>230</sup>

64. Witnesses did not support statutory declarations because they would not provide the necessary assurances regarding the voter’s identity.<sup>231</sup> Although there would be an audit trail and a record it would not in practice “provide an awful lot more assurance than the previous position before the introduction of voter ID, which is effectively to declare yourself and declare your identity before you were given a ballot paper.”<sup>232</sup>
65. **While we acknowledge the additional administrative burden that attestation would introduce, we consider it a potentially valuable means by which to make voting accessible for members of the electorate who do not own an accepted form of photo identification and are unable to obtain a Voter Authority Certificate in time. We do not consider attestation to undermine the principle of voter ID provided the number of people each voter can attest for is limited to one or two. As awareness of the Voter Authority Certificate increases, and if the application deadline were able to be brought closer to polling day, accessibility may improve. Nonetheless, we recommend the Government keeps its position on this issue under review.**
66. **We do not support the introduction of statutory declarations as an alternative to showing voter ID, as doing so would provide insufficient safeguards to uphold the integrity of a system of voter ID.**

*Impact of voter ID on the administration of the next general election, including recruitment and retention of staff*

67. Witnesses told us the electoral sector and electoral infrastructure were increasingly stretched.<sup>233</sup> Elections were successful despite this because the staff administering them were “incredibly dedicated and experienced people” who managed to deliver in the face of significant risk and challenges.<sup>234</sup> The Electoral Commission expressed concern about the presumption that the electoral sector would pull elections “out of the hat”. There would come a day when this would not happen, which would jeopardise the poll itself and wider confidence in elections, which could take a generation to rebuild.<sup>235</sup>
68. Polling station staff were volunteers who were paid expenses.<sup>236</sup> Local authorities had found it increasingly difficult to recruit and retain polling station volunteers—particularly as volunteers tended to be older people—and they did not have the resources to

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<sup>230</sup> Department for Levelling Up, Housing and Communities, *Government response to Electoral Commission report on May elections* (30 November 2023): <https://www.gov.uk/government/publications/government-response-to-the-electoral-commissions-report-on-the-may-2023-local-elections/government-response-to-electoral-commission-report-on-may-elections> [accessed 18 December 2023]; [Q 88](#) (Simon Hoare MP)

<sup>231</sup> [Q 12](#) (Tom Hawthorn); [Q 46](#) (Graham Farrant, Cleland Sneddon)

<sup>232</sup> [Q 12](#) (Tom Hawthorn)

<sup>233</sup> Written evidence from Cleland Sneddon ([VID0002](#)), para 27; Written evidence from Prof Toby James ([VID0005](#)), para 15; Written evidence from Local Government Information Unit ([VID0006](#))

<sup>234</sup> [Q 5](#) (Craig Westwood); Written evidence from Local Government Information Unit ([VID0006](#))

<sup>235</sup> [Q 5](#) (Craig Westwood)

<sup>236</sup> [Q 23](#) (Peter Stanyon)

backfill positions.<sup>237</sup> There was no central pool of election staff and it was ultimately the responsibility of each returning officer to ensure they had staffing plans in place to allow a poll to run smoothly.<sup>238</sup> Staffing became an even greater concern at a general election because—unlike in the May 2023 local elections—local authorities were unable to ‘borrow’ staff from neighbouring authorities.<sup>239</sup> However, Tom Hawthorn told us the Electoral Commission was working with returning officers, the Local Government Association and SOLACE<sup>240</sup> to develop strategies to promote roles at polling stations.<sup>241</sup> Becca Crosier said the Government was working with the Electoral Commission and the Association of Electoral Administrators on this issue and Simon Hoare MP told us he would be having conversations with returning officers about how best to ensure adequate staffing on polling day.<sup>242</sup>

69. At the May 2023 elections there were some volunteers who declined the role because they had concerns about how voter ID policy would be administered and others who took part in the training for voter ID but decided not to continue (according to Simon Hoare MP the latter amounted to 18 per cent).<sup>243</sup> With the introduction of voter ID polling station volunteers now had to have more technical knowledge than they did previously.<sup>244</sup> There was also a sense that staff felt their role had changed from one in which they facilitated people voting to one in which they were the gatekeeper deciding whether someone could vote.<sup>245</sup>
70. Some concerns may be assuaged following the successful (from an administrative point of view) delivery of the voter ID policy at the May 2023 elections.<sup>246</sup> Cleland Sneddon and Graham Farrant warned against overestimating the administrative problem posed by voter ID and making staff unnecessarily nervous about the role.<sup>247</sup> Martha Matheou considered the paperwork for voter ID an additional burden to polling staff but said there were always polling station staff who dropped out. In her opinion staffing issues were not because of the voter ID policy; they were due to the levels of pay.<sup>248</sup>
71. Graham Farrant and Cleland Sneddon told us they were looking at ways to incentivise employees to carry out election duties, and that it could reach a point in which they had to direct local authority staff to carry out this work.<sup>249</sup> However, doing so would have a “significant impact” on council operations at a time when capacity was already

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<sup>237</sup> [Q 5](#) (Craig Westwood); [Q 23](#) (Peter Stanyon); [Q 31](#) (Graham Farrant, Cleland Sneddon); Written evidence from Cleland Sneddon ([VID0002](#)), para 29; Written evidence from Prof Alistair Clark ([VID0008](#)), paras 22–23; Written evidence from Local Government Information Unit ([VID0006](#))

<sup>238</sup> [Q 9](#) (Tom Hawthorn)

<sup>239</sup> [Q 5](#) (Craig Westwood); [Q 31](#) (Graham Farrant, Martha Matheou); [Q 41](#) (Cleland Sneddon); Written evidence from Local Government Information Unit ([VID0006](#))

<sup>240</sup> The Society of Local Authority Chief Executives and Senior Managers, a members’ network for local government and public sector professionals.

<sup>241</sup> [Q 6](#) (Tom Hawthorne)

<sup>242</sup> [Q 89](#) (Simon Hoare MP); [Q 90](#) (Becca Crosier)

<sup>243</sup> [Q 6](#) (Craig Westwood); [Q 30](#) (Peter Stanyon); [Q 31](#) (Graham Farrant, Cleland Sneddon); Written evidence from Cleland Sneddon ([VID0002](#)), para 29; Written evidence from Local Government Information Unit ([VID0006](#)); Written evidence from Democracy Volunteers ([VID0007](#)); [Q 91](#) (Simon Hoare MP)

<sup>244</sup> [Q 23](#) (Peter Stanyon)

<sup>245</sup> [Q 31](#) (Cleland Sneddon); Written evidence from Democracy Volunteers ([VID0007](#))

<sup>246</sup> [Q 6](#) (Craig Westwood); [Q 30](#) (Peter Stanyon); [Q 41](#) (Graham Farrant); [Q 91](#) (Simon Hoare MP)

<sup>247</sup> [OO 31, 42](#) (Cleland Sneddon); [Q 33](#) (Graham Farrant)

<sup>248</sup> [OO 32, 41](#) (Martha Matheou)

<sup>249</sup> [Q 31](#) (Graham Farrant, Cleland Sneddon); Written evidence from Prof Alistair Clark ([VID0008](#)), para 39

significantly reduced.<sup>250</sup> Problems could also arise from introducing non-expert staff into an area governed by a complex body of law.<sup>251</sup> Graham Farrant was keen to encourage younger people to work at polling stations.<sup>252</sup> Becca Crosier offered the help of civil servants to assist local authorities at polling stations, as happened in 2021.<sup>253</sup>

72. In its reports IFF Research noted learning that could be applied to the next general election, including “the tight timeframe for completing recruitment (especially where greater numbers were needed), developing training materials for the new measures, delivering training and processing VAC applications.” Electoral administrators “felt that although they had managed to meet their requirements for the May 2023 local elections, they expected that they would need to deploy more staff resource, and would require more lead in time to process VACs applications to meet the deadline, and recruit polling station staff.”<sup>254</sup>
73. **The electoral sector operates under a concerning degree of strain, which has been exacerbated by the introduction of voter ID and other policies included in the Elections Act 2022. We are concerned that the extra burden of these requirements may make it more difficult for returning officers to administer, within the time available, the preparation and conduct of elections, and to recruit and retain polling station staff, requiring the mandation of council staff to carry out election duties. We urge the Government to explore means by which it can assist returning officers in ensuring they have adequate staff and resources available to deliver on the lead up to elections and on polling day itself. We welcome the Government’s commitment to offer returning officers support from civil servants.**
74. The Electoral sector was making contingency plans for three potential scenarios regarding the timing of the next general election: a general election before the planned May 2024 polls; a general election combined with the May 2024 polls; and a general election after the May 2024 polls.<sup>255</sup> Cleland Sneddon told us that reduction in resources meant that ability to deliver a snap election was “significantly lower than it was when we did it in 2019”.<sup>256</sup> A general election called in June would be similarly challenging because it would mean holding one election straight after the other.<sup>257</sup>
75. A key concern was the possibility of the next general election being combined with the May 2024 local elections<sup>258</sup>—a scenario that may only become clear five or six weeks ahead of polling day. This would have serious implications for the ability of administrative staff to ensure key resources (including sufficient staff) and processes were in place.<sup>259</sup> Other challenges would include the different legislative rules

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<sup>250</sup> [Q 41](#) (Cleland Sneddon); Written evidence from Cleland Sneddon ([VID0002](#)), para 33

<sup>251</sup> Written evidence from Prof Alistair Clark ([VID0008](#)), para 39

<sup>252</sup> [Q 31](#) (Graham Farrant)

<sup>253</sup> [Q 90](#) (Becca Crosier)

<sup>254</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), p 31:

[https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f4000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]

<sup>255</sup> [Q 7](#) (Craig Westwood); [Q 22](#) (Peter Stanyon)

<sup>256</sup> [Q 32](#) (Cleland Sneddon); Written evidence from Local Government Information Unit ([VID0006](#))

<sup>257</sup> [Q 22](#) (Peter Stanyon)

<sup>258</sup> [Q 22](#) (Peter Stanyon); Written evidence from Prof Alistair Clark ([VID0008](#)), para 37

<sup>259</sup> [Q 9](#) (Craig Westwood); [Q 22](#) (Peter Stanyon)

underpinning different types of poll and the need to manage multiple different ballot paper counts at the same time.<sup>260</sup>

76. Graham Farrant told us the key difference between local and general elections was the degree of “stress and scale”, and that voter ID “adds another element to that”.<sup>261</sup> By Peter Stanyon’s calculations there were approximately 47 million voters registered for the next general election and about 23 million of those will not have participated in the May 2023 local elections and will therefore have no experience with voter ID.<sup>262</sup> Over 60 per cent of polling station workers surveyed by Professor Alistair Clark and Professor Toby James indicated that voter ID meant it took longer to process voters than it had previously. There was a risk this would lead to queues at polling station, which could serve as a disincentive to voting.<sup>263</sup> Martha Matheou was concerned that people would be turned away from polling stations in marginal seats for not having photo ID and this could have an impact on the outcome of the election.<sup>264</sup>
77. Local authorities in Scotland and Wales and approximately one-third of local authorities in England did not run elections with voter ID in May 2023 and therefore lack experience in this area.<sup>265</sup> However, Cleland Sneddon told us that returning officers in Scotland and their teams had the opportunity to observe proceedings in England, which proved “very helpful”.<sup>266</sup> He noted that in Scotland voter ID will be required for general elections but not for local or Scottish parliamentary elections. There was already a degree of confusion arising from the different voting methods employed at different elections in Scotland.<sup>267</sup>
- 78. Local elections will take place in May 2024 for councils and mayors in England and Police and Crime Commissioners in England and Wales. It is conceivable that the next general election might also take place on the same day. Doing so could present an increased risk to the delivery of, and confidence in, all polls scheduled for that day. We are particularly concerned about the impact this would have on the administration of polls in Wales and areas of England that have no former experience administering the voter ID policy. In Wales voters will be expected to present voter ID for the general election but not for local elections, which risks causing further confusion.**
79. Electoral management system software suppliers, paper suppliers, printers and Royal Mail all play a fundamental role in the delivery of elections.<sup>268</sup> The Electoral Commission told us they engaged with these actors themselves and through returning officers at the local level to see how they could support their processes. They also engaged at Chief Executive level with Royal Mail to ensure priority was given to electoral material, as did Simon Hoare MP.<sup>269</sup>

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<sup>260</sup> [Q 7](#) (Craig Westwood); [QQ 32, 41](#) (Martha Matheou)

<sup>261</sup> [Q 39](#) (Graham Farrant)

<sup>262</sup> [Q 18](#) (Peter Stanyon)

<sup>263</sup> Written evidence from Prof Alistair Clark ([VID0008](#)), paras 33–35

<sup>264</sup> [Q 39](#) (Martha Matheou)

<sup>265</sup> [Q 21](#) (Peter Stanyon); Written evidence from Local Government Information Unit ([VID0006](#))

<sup>266</sup> [Q 31](#) (Cleland Sneddon)

<sup>267</sup> [Q 31, 39](#) (Cleland Sneddon)

<sup>268</sup> [Q 13](#) (Craig Westwood)

<sup>269</sup> [Q 13](#) (Craig Westwood); [Q 83](#) (Simon Hoare MP)

80. Cleland Sneddon spoke of the need to “substantially improve” the performance of contractors involved in the elections process and in particular, the performance of printers. He also noted the reduced availability of spaces to use as polling stations. With the introduction of voter ID there was a need to ensure polling stations have capacity to allow those who wish to confirm their identity in private to do so.<sup>270</sup>
81. ***We urge the Government and the Electoral Commission to continue to engage with Royal Mail and other contractors to ensure delivery of materials key to the successful conduct of elections is prioritised on the lead up to polling day.***
82. There were not significant reported cases of staff abuse in response to the voter ID policy following the May 2023 local elections.<sup>271</sup> Witnesses noted there were incidences of frustration among voters but “no outright abuse”.<sup>272</sup> Martha Matheou pointed out that polling staff sometimes had to turn voters away before voter ID so the new policy had not introduced a new set of circumstances.<sup>273</sup>
83. Returning officers told us they had a single point of contact with their local police forces specifically for elections.<sup>274</sup> The Electoral Commission worked with police forces and the National Police Chiefs’ Council to ensure they were ready to respond to any disturbances and continued to do so.<sup>275</sup> Peter Stanyon said every returning officer would risk-assess the possibility of abuse and that polling staff received training on how to defuse situations.<sup>276</sup> He predicted there may be a more “heated atmosphere” at a general election but said the feedback they had received from the May 2023 local elections was that electors generally accepted the new policy.<sup>277</sup>
84. ***We welcome the work the Electoral Commission has undertaken with police and the National Police Chiefs’ Council to ensure they are ready to respond to disturbances at polling stations in response to the voter ID requirement. We recommend this continues for future polls.***
85. The Department for Levelling Up, Housing and Communities had provided ‘New Burdens’ funding for local authorities implementing the voter ID policy.<sup>278</sup> This consisted of £25 million of funding to local authorities to implement changes introduced by the Elections Act 2022, £14 million of which was for voter ID. Local authorities could also make a ‘justification-led bid’ for additional funding if they could demonstrate need. Further funding was due to become available in April 2024 for further implementation of the Elections Act 2022. For voter ID, the May 2023 polls were costed based on likely numbers of Voter Authority Certificate applications and the need for additional core

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<sup>270</sup> [Q 32](#) (Cleland Sneddon); Written evidence from Cleland Sneddon ([VID0002](#)), para 32

<sup>271</sup> [Q 5](#) (Craig Westwood)

<sup>272</sup> [Q 45](#) (Cleland Sneddon, Graham Farrant)

<sup>273</sup> [Q 45](#) (Martha Matheou)

<sup>274</sup> [Q 45](#) (Graham Farrant, Cleland Sneddon, Martha Matheou)

<sup>275</sup> [QQ 5, 9](#) (Craig Westwood)

<sup>276</sup> [Q 21](#) (Peter Stanyon)

<sup>277</sup> [Q 21](#) (Peter Stanyon); Written evidence from Local Government Information Unit ([VID0006](#))

<sup>278</sup> [QQ 71, 79](#) (Simon Hoare MP); Department for Levelling Up, Housing and Communities, *Elections Act New Burdens funding methodology: voter identification and accessibility* (19 December 2022): <https://www.gov.uk/government/publications/elections-act-new-burdens-funding-methodology-voter-identification-and-accessibility/elections-act-new-burdens-funding-methodology-voter-identification-and-accessibility> [accessed 18 December 2023]

staff. For a general election full funding would be made available “in the usual way”.<sup>279</sup> The Department provided resources to help local authorities electoral services teams process Voter Authority Certificate applications. In May 2023 77% of local authorities were aware of this and 17% were not. No electoral services teams used the external resource support to process Voter Authority Certificate applications in May 2023.<sup>280</sup>

86. The cost burden of delivering elections was an issue raised by witnesses.<sup>281</sup> Cleland Sneddon told us a general election should never be subsidised by local authorities—there should be “a mechanism for full cost recovery and a continuous review of the costs associated with delivering an election”.<sup>282</sup> Costs arising from the voter ID policy included: printing and distributing Voter Authority Certificates, purchasing privacy screens, mirrors and stationery, and delivering additional training.<sup>283</sup> While Graham Farrant said ‘new burdens funding’ paid for initial purchases, he was concerned that future replacement costs might fall on the local authority.<sup>284</sup> Martha Matheou said that in London—where there were no local elections in May 2023—it was difficult to predict where the increases in cost would occur.<sup>285</sup> She was also concerned that payments to polling staff could be cut at a time when more was being asked of them. She thought this would cause a problem.<sup>286</sup> In her view, there should be a review conducted into funding for electoral services and it would be helpful if funding were “less complicated” with “less red tape”.<sup>287</sup>
- 87. While the ‘new burdens’ funding and the availability of ‘justification-led bids’ to local authorities implementing voter ID is welcome, these funds must not be limited to initial costs. We recommend that the Department for Levelling Up, Housing and Communities maintains funding for future costs associated with voter ID.**

*The cumulative impact of changes to the voting system*

88. The May 2024 local elections and the next general election will take place under a much-amended legal framework. Changes included:
- Requirement to renew postal voting rights every 3 years (from October 2023);
  - Reduction in the number of electors a proxy can represent (from October 2023);
  - Introduction of online absent voting applications (from October 2023)
  - Simplification and clarification of the offence of undue influence (from November 2023);

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<sup>279</sup> [Q 79](#) (Becca Crosier)

<sup>280</sup> Department for Levelling Up, Housing and Communities, *Electoral Integrity Programme Evaluation: Year 1 – IFF Research for DLUHC* (November 2023), pp 49–50:  
[https://assets.publishing.service.gov.uk/media/65675010312f40000de5d5db/Electoral\\_Integrity\\_Programme\\_Evaluation\\_main\\_report.pdf](https://assets.publishing.service.gov.uk/media/65675010312f40000de5d5db/Electoral_Integrity_Programme_Evaluation_main_report.pdf) [accessed 18 December 2023]

<sup>281</sup> [Q 32](#) (Martha Matheou); [Q 44](#) (Cleland Sneddon)

<sup>282</sup> [Q 44](#) (Cleland Sneddon)

<sup>283</sup> [Q 44](#) (Cleland Sneddon, Graham Farrant)

<sup>284</sup> [Q 44](#) (Graham Farrant)

<sup>285</sup> [Q 44](#) (Martha Matheou)

<sup>286</sup> [Q 32](#) (Martha Matheou)

<sup>287</sup> [Q 44](#) (Martha Matheou)

- Introduction of digital imprints (from November 2023);
- Ending of time limits on the right to vote of British citizens living abroad (from January 2024);
- Changes to the voting and candidacy rights of EU citizens (from May 2024);
- Candidate addresses changes (at UK Parliamentary elections) and commonly used names changes (in effect after May 2024);
- Restrictions on postal vote handling by election campaigners (in effect from May 2024).<sup>288</sup>

89. The cumulative changes introduced by the Elections Act 2022 added additional “layers of complexity” and “compound risk” for election administrators.<sup>289</sup> Craig Westwood thought that people tended to take the action needed to enable them to vote just ahead of the poll and that was likely to be the case with the new changes introduced by the Elections Act 2022. This would add an additional burden on electoral administrators at an already busy time.<sup>290</sup> Peter Stanyon thought the biggest ‘pinch point’ for the next election would be eleven or twelve days before polling day, when registrations for online absent voting would close and six days before the poll, when Voter Authority Certificate applications would close.<sup>291</sup> Peter Stanyon spoke about a lack of understanding about the cumulative effect of multiple changes to the electoral system:

“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.”<sup>292</sup>

90. Graham Farrant said the changes introduced by the Elections Act 2022 were “adding more and more modern processes on to what is fundamentally and old-fashioned system”.<sup>293</sup> Other witnesses agreed and thought a fundamental review of the electoral process would be a better approach.<sup>294</sup> Graham Farrant was concerned that the additional burdens introduced by the Elections Act 2022 would cause problems, particularly in elections where margins were very tight.<sup>295</sup> Martha Matheou said reforms were being pushed through “without taking stock of the journey for the elector and what it will involve for the back-end office”. She thought a better approach would be to phase changes in, providing time to adapt and review. As things currently stood, she was concerned about the administration of the May 2024 local elections.<sup>296</sup> Graham Farrant

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<sup>288</sup> Electoral Commission, *Planning for tranche 2 of the Elections Act changes* (September 2023), pp 3–4: <https://www.electoralcommission.org.uk/sites/default/files/2023-11/Key%20considerations%20for%20Tranche%202%20of%20the%20Elections%20Act%202022.pdf> [accessed 18 December 2023]; Written evidence from Prof Stuart Wilks-Heeg and Prof Maria Sobolewska ([VID0008](#)), para 27

<sup>289</sup> [Q 5](#) (Craig Westwood); [Q 18](#) (Peter Stanyon)

<sup>290</sup> [Q 5](#) (Craig Westwood)

<sup>291</sup> [Q 21](#) (Peter Stanyon)

<sup>292</sup> [Q 30](#) (Peter Stanyon); Written evidence from Local Government Information Unit ([VID0006](#))

<sup>293</sup> [Q 47](#) (Graham Farrant)

<sup>294</sup> [Q 47](#) (Graham Farrant, Cleland Sneddon, Martha Matheou); Written evidence from Prof Toby James ([VID0005](#)), para 17

<sup>295</sup> [Q 47](#) (Graham Farrant)

<sup>296</sup> [Q 47](#) (Martha Matheou)



spoke about the burden that would be created if the ‘tranche 2’ Elections Act measures needed to be implemented during combined general and local elections in May 2024. While every local authority would do everything it could to deliver on the elections, that “may be at the expense of other things”.<sup>297</sup>

91. In written evidence Cleland Sneddon said:

“It is a system where there is little resilience and limited contingency capacity. The additional pressures associated with the new changes to the voting system are adding to the demands on the limited resources when local authorities’ own resources, which must be made available to the Returning Officer, are already over committed.”<sup>298</sup>

92. In addition to the introduction of voter ID and the other changes made by the Elections Act 2022, constituency boundary changes would have taken effect for the next general election, which would create more cross-boundary constituencies between local authorities and give rise to a need to communicate to electors that they may now be voting in a different constituency.<sup>299</sup>

93. There was a need to support returning officers in getting through the coming changes,<sup>300</sup> including by making additional funding available “to ensure the safe delivery of general elections”.<sup>301</sup>

**94. The decision to introduce multiple changes to the electoral system simultaneously or in quick succession has placed a significant burden on a system with limited resilience and has introduced increased risk to the successful delivery of elections. Scheduling the next general election ahead of the May 2024 local elections or combining a general election with the local elections could exacerbate this risk.**

*The adequacy of data collection*

95. At the May 2023 local elections there was a legal requirement for local authorities to provide data relating to voter ID,<sup>302</sup> though this did not include a duty to collect data regarding awareness of the voter ID requirement and Voter Authority Certificate across different demographic groups.<sup>303</sup> Despite some data quality and data collection issues (discussed in paragraph 98 below), the Electoral Commission was satisfied with the overall coverage of the data.<sup>304</sup> Some polling staff reported finding it difficult to record the data, though we understand the Government, the Electoral Commission, returning officers and electoral administrators are reviewing data collection forms and guidance to make them more user-friendly.<sup>305</sup>

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<sup>297</sup> [Q 47](#) (Graham Farrant, Cleland Sneddon)

<sup>298</sup> Written evidence by Cleland Sneddon ([VID0002](#)), para 36

<sup>299</sup> [Q 21](#) (Peter Stanyon); [Q 39](#) (Martha Matheou)

<sup>300</sup> [Q 30](#) (Peter Stanyon)

<sup>301</sup> Written evidence by Cleland Sneddon ([VID0002](#)), para 38; Written evidence from Prof Toby James ([VID0005](#)), para 16; Written evidence from Democracy Volunteers ([VID0007](#))

<sup>302</sup> [Q 14](#) (Tom Hawthorn)

<sup>303</sup> [Q 18](#) (Peter Stanyon)

<sup>304</sup> [Q 14](#) (Tom Hawthorn)

<sup>305</sup> Cleland Sneddon ([VID0002](#)), para 40

96. There was no statutory requirement for returning officers to collect data at the May 2024 elections, but there was such a requirement for the next two general elections.<sup>306</sup> There was nonetheless a strong consensus across electoral administrators that returning officers should continue to collect data, including where there was no statutory requirement to do so.<sup>307</sup> The Electoral Commission and the Association of Electoral Administrators thought a change in legislation to make data collection compulsory at local elections would be helpful but not essential.<sup>308</sup>
97. In its response to the Electoral Commission’s recommendations the Government said it supported the Commission’s view that ongoing data collection would be beneficial. However, it “takes the position that this should remain at the discretion of the Returning Officer, where they deem it appropriate and manageable to do so.” It also said it was “already working with the Electoral Commission to refine the process of data collection to ensure its clarity and efficiency for polling station staff, and will seek feedback from the sector to ensure that improvements can be made for future elections.”<sup>309</sup>
98. Concerns arose about the reliability of data at polling stations that employed ‘greeters’.<sup>310</sup> Greeters may have informed voters about the voter ID requirement before they reached the polling station itself, which may have caused voters to turn away without being counted. The Electoral Commission acknowledged this, while also noting that legislation specifically asked for the data to be split between polling stations that employed greeters and those who did not. This resulted in a slight difference in data—those polling stations that did employ greeters had a slightly lower number of people recorded as having been initially turned away compared to those polling stations that did employ greeters.<sup>311</sup> Graham Farrant said that in the case of BCP Council where greeters told somebody about the ID requirement and that person turned back, that was recorded. However, greeters were not the only reason to question the reliability of data collected at polling stations. Data would not have been recorded if a teller or a candidate told somebody about the voter ID requirement.<sup>312</sup> BCP councillors reported conversations they had on the doorstep in which people said they could not vote because they did not have an accepted form of ID.<sup>313</sup> These people would not have been recorded in polling station data.
99. The Electoral Commission has added a section on voter ID to the nationally representative public survey it conducts after every set of elections. This adds a broader set of information and helps interpret the impact of the voter ID policy—for example, by gathering information on how many people turned back after being reminded by greeters that they needed photographic ID to vote, or how many people found out

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<sup>306</sup> [Q 14](#) (Tom Hawthorn)

<sup>307</sup> [Q 14](#) (Tom Hawthorn); [Q 29](#) (Peter Stanyon); [Q 48](#) (Cleland Sneddon, Graham Farrant)

<sup>308</sup> [Q 14](#) (Tom Hawthorn); [Q 29](#) (Peter Stanyon)

<sup>309</sup> Department for Levelling Up, Housing and Communities, *Government response to Electoral Commission report on May elections* (30 November 2023), p 8: <https://www.gov.uk/government/publications/government-response-to-the-electoral-commissions-report-on-the-may-2023-local-elections/government-response-to-electoral-commission-report-on-may-elections> [accessed 18 December 2023]

<sup>310</sup> Written evidence from Unlock Democracy ([VID0003](#)); Written evidence from Prof Stuart Wilks-Heeg and Prof Maria Sobolewska ([VID0008](#)), para 20; Written evidence from Democracy Volunteers ([VID0007](#))

<sup>311</sup> [Q 15](#) (Tom Hawthorn)

<sup>312</sup> [Q 49](#) (Graham Farrant)

<sup>313</sup> [QQ 33, 35](#) (Graham Farrant)

about the voter ID requirement just before polling day and decided not to go to the polling station at all.<sup>314</sup>

100. The Electoral Commission was conscious of not devising a data collection process that created a disproportionate additional burden on electoral administrators.<sup>315</sup> Graham Farrant noted the pressure from the media to provide data immediately following the May 2023 local elections, which was a challenge for polling staff.<sup>316</sup>

**101. We note that polling station data collection is incapable of recording those who for whatever reason do not enter a polling station. We acknowledge public opinion surveys by the Electoral Commission, Ipsos and others may go some way in rectifying this issue but is unlikely to present a full picture.**

**102. We are disappointed the Government has decided against making data collection on the impact of voter ID compulsory for local elections. While we recognise concerns that doing so would increase the burden on elections staff, the Government is working with the Electoral Commission to clarify the data collection process and make it more efficient. In addition, there is strong consensus among electoral administrators that returning officers should continue to collect data. We urge the Government to reconsider its decision and introduce legislative change to this effect as soon as possible.**

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<sup>314</sup> [Q 15](#) (Tom Hawthorn)

<sup>315</sup> [Q 17](#) (Craig Westwood)

<sup>316</sup> [Q 48](#) (Graham Farrant)