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Select Committee on the Constitution

13th Report of Session 2021–22

Elections Bill

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Select Committee on the Constitution

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Elections Bill

Introduction

1. The Elections Bill was introduced to the House of Commons on 5 July 2021 and brought to the House of Lords on 18 January 2022. Second reading was on 23 February 2022 and committee stage is scheduled to commence on 10 March 2022.
2. The aim of the Bill is to “ensure that UK elections remain secure, fair, modern, inclusive and transparent”.¹ It contains provisions intended to:
 - overcome “personation” by introducing voter identification at polling stations;²
 - stop postal vote harvesting;³
 - restrict the number of people for whom a person can act as proxy voter;⁴
 - introduce an offence of “undue influence”;⁵
 - introduce a simple majority electoral system for the election of combined authority mayors, the mayor of London and police and crime commissioners;⁶
 - introduce a strategy and policy statement for the Electoral Commission;⁷ and
 - introduce the “imprinting” of digital electoral material.⁸
3. The Bill was not made subject to pre-legislative scrutiny. The Commons Public Administration and Constitutional Affairs Committee argued that a joint committee should have been established to undertake pre-legislative scrutiny of the Bill.⁹
4. **The electoral process is of fundamental importance to the constitution and we note that serious concerns have been raised about aspects of this Bill, in particular its provisions on personation and the functioning of the Electoral Commission.**
5. **We share the Public Administration and Constitutional Affairs Committee’s regret that the Bill was not subject to pre-legislative scrutiny. Given the constitutional significance of elections it is important that the law governing them is as non-partisan and**

1 [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], para 1. For territorial extent and application of the Bill see [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], paras 92–102

2 [Elections Bill](#), clause 1 and Schedule 1 [HL Bill 96 (2021–22)]

3 [Elections Bill](#), clauses 3, 4 and 5 and Schedule 3 [HL Bill 96 (2021–22)]

4 [Elections Bill](#), clause 6 and Schedule 4 [HL Bill 96 (2021–22)]

5 [Elections Bill](#), clause 8 [HL Bill 96 (2021–22)]

6 [Elections Bill](#), clause 11 [HL Bill 96 (2021–22)]

7 [Elections Bill](#), clause 14 [HL Bill 96 (2021–22)]

8 [Elections Bill](#), clause 37 [HL Bill 96 (2021–22)]

9 House of Commons Public Administration and Constitutional Affairs Committee, [The Elections Bill](#) (5th Report, Session 2021–22, HC 597), para 32

uncontroversial as possible. Pre-legislative scrutiny could have helped achieve this.

6. Electoral law has grown incrementally through many Representation of the People Acts, the Political Parties, Elections and Referendums Act 2000 and other legislation. The law has also diversified, with the devolved aspects of electoral law increasing significantly and in complex ways in the Scotland Acts 2012 and 2016 and the Wales Act 2017. Electoral law is therefore spread across several pieces of statute. The Law Commissions and the Committee on Standards in Public Life have recently recommended the consolidation and simplification of electoral law.¹⁰
7. The Public Administration and Constitutional Affairs Committee thought that the Bill was a missed opportunity to simplify and consolidate electoral law.¹¹ The Government has previously acknowledged the need to consolidate electoral law but argued that there are more immediate challenges to be addressed, including ensuring “our elections are secure and updated for the age, maintaining confidence and the integrity of people’s choices.”¹²
8. **The consolidation of electoral law is necessary and overdue, but it would be a significant undertaking. We recommend that the Government takes steps to consolidate electoral law before the next general election.**

Part 1: Administration and conduct of elections

Voter identification

9. Clause 1 and Schedule 1 amend the Representation of the People Act 1983 to introduce a requirement that voters must show photo identification before receiving a ballot paper at the polling station for UK parliamentary elections.¹³ The intention of clause 1 is to overcome “personation”.¹⁴
10. The proposed changes allow for a range of photo identification to be used by registered voters, including a passport, driving licence, PASS scheme card, Blue Badge scheme ID or approved travel pass.¹⁵ The Bill also allows for a “Voter Card” to be issued free of charge by the electoral registration officer

10 Law Commission of England and Wales, Scottish Law Commission, ‘Electoral Law: A joint final report’ (16 March 2020) para 1.4.: https://s3-eu-west-2.amazonaws.com/lawcom-prod-storage-11jxou24uy7q/uploads/2020/03/6.6339_LC_Electoral-Law_Report_FINAL_120320_WEB.pdf [accessed 4 February 2022]; The Committee on Standards in Public Life, ‘Regulating Election Finance: A Review by the Committee on Standards in Public Life’ (July 2021) p 4: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999636/CSPL_Regulating_Election_Finance_Review_Final_Web.pdf [accessed 4 February 2022]

11 House of Commons Public Administration and Constitutional Affairs Committee, *The Elections Bill* (5th Report, Session 2021–22, HC 597), para 23

12 House of Commons Public Administration and Constitutional Affairs Committee, *Electoral law: The Urgent Need for Review: Government Response to the Committee’s First Report of Session 2019* (First Special Report, Session 2019–21, HC 327), p 3

13 *Elections Bill*, clause 1 and Schedule 1 [HL Bill 96 (2021–22)]

14 The offence of personation occurs when someone votes pretending to be another person. If found guilty, the convicted person can be subject to an unlimited fine or up to two years in prison (or both). Punishment can also include disqualification from standing for election and a ban on voting at any election for five years.

15 *Elections Bill*, Schedule 1 [HL Bill 96 (2021–22)]

for the area in which the elector is registered, if a person requests one.¹⁶ The Voter Card scheme will be implemented by secondary legislation.¹⁷

11. The Government argues that there is a significant problem to be dealt with: personation is a serious issue, it undermines public confidence in democracy and is not victimless.¹⁸ The Government refers to international criticism of the United Kingdom, for example by the Organization for Security and Cooperation in Europe, for its failure to require proof of identity at polling stations.¹⁹
12. There were 21 allegations of personation in 2014, 26, 44 and 28 in the three following years, and none since.²⁰ Opponents of voter identification argue that reported cases of personation are rare and the measure is likely to suppress voter turnout. In evidence to the public bill committee in the House of Commons Richard Mawrey QC said that personation at polling stations was very rare, and that a greater risk stemmed from postal vote personation, which is very difficult to detect.²¹
13. The Government points to the voter identification system introduced in Northern Ireland after the Good Friday Agreement and says the system “does not have an adverse effect on election turnout or participation” in Northern Ireland.²² The Electoral Commission has examined this issue on several occasions in recent years, including by evaluating Government pilot schemes,²³ and has recommended the adoption of the Northern Ireland system in which a free electoral identity card is available to voters.²⁴
14. In 2020, the post-legislative scrutiny Select Committee on the Electoral Registration and Administration Act 2013 made recommendations about voter ID, including that it should not be introduced for the first time at a general election, and that the Government should take steps to mitigate the risk of a reduction in turnout (particularly among BAME groups, young people and students, disabled people and some older people).²⁵
15. **We regret that pre-legislative scrutiny was not conducted on this Bill. If it had been, it would have allowed a fuller assessment of the risk of personation versus that of reduced turnout.**
16. Concerns have been raised about how the voter identification scheme will be implemented. In evidence to the Joint Committee on Human Rights, the Electoral Commission suggested that polling stations were open to possible voter fraud and that a solution was warranted. The Commission was,

16 [Elections Bill](#), Schedule 1 [HL Bill 96 (2021–22)]; [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], paras 105–107

17 [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], paras 106–107, 110

18 HC Deb, 10 April 2019, cols [332](#) and [339](#)

19 [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], para 14

20 House of Commons Library, *Elections Bill 2021–22*, Research Briefing [Number CBP 9999](#), 1 September 2021, p 17

21 HC Deb, 15 September 2021, [Col 15](#)

22 HC Deb, 10 April 2019 [Col 332](#)

23 The Electoral Commission, ‘Voter identification pilot schemes’: <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/our-views-and-research/our-research/voter-identification-pilots> [accessed 4 February 2022]

24 The Electoral Commission, *Delivering and costing a proof of identity scheme for polling station voters in Great Britain* (December 2015) para 4.17: https://www.electoralcommission.org.uk/sites/default/files/pdf_file/Proof-of-identity-scheme-updated-March-2016.pdf

25 Select Committee on the Electoral Registration and Administration Act 2013, *An electoral system fit for today? More to be done*, HL Paper 83, 8 July 2020. See particularly paras 359, 372 and 373.

however, cautious about the practical implementation of the scheme, taking the view that any solution should meet various tests:

“Making a change in introducing voter ID has to improve security, it has to maintain complete accessibility to the system; and it has to be a workable, practical system. Those are the three tests. We have not for one moment suggested that those tests have been passed.”²⁶

17. The Public Administration and Constitutional Affairs Committee concluded that the Government:

“should not proceed with this proposal until it has set out the criteria it used in its assessment of the proportionality of introducing the voter ID requirements on voter turnout and participation and undertaken further consultation and research on the impact of the voter ID requirement on groups with protected characteristics.”²⁷

18. *The House may wish to require safeguards to be put in place to ensure that the proposed voter identification system does not significantly reduce turnout. It would assist the House’s consideration if draft regulations and an analysis of their likely impact were to be published and the House may wish to consider whether it is willing to approve these provisions in their absence.*
19. The timing of introducing the new system is important. There are risks in introducing the system for a general election where, given the scale of the process and the significance of such an election, the risk of, and harm resulting from, lower turnout is problematic.
20. **The new voter identification system should not be trialled at a general election. We recommend that, if feasible, the Government endeavours to introduce the new system in time for the May 2023 English local elections and that any problems identified in this process be addressed fully before the next general election, assuming it takes place after May 2023.** Given that it is good practice under the Gould principle²⁸ for major changes to electoral processes to be introduced six months before a major electoral event, this would require statutory instruments to be prepared quickly.

Postal and proxy voting

21. Clause 3, which gives effect to Schedule 3, amends Schedule 4 to the Representation of the People Act 2000 to set new time limits for postal vote applications. At present the right to vote absently continues indefinitely, through a five yearly updating of a person’s signature. The new provision would require voters to renew their postal vote applications every three

26 Oral evidence taken before the Joint Committee on Human Rights, 26 May 2021 (session 2021–22), [Q 10](#) (Bob Posner)

27 Public Administration and Constitutional Affairs Committee, *The Elections Bill* (5th Report, Session 2021–22, HC 597), p 4

28 The finding of Ron Gould, who was appointed to conduct an independent review into electoral events in Scotland following the combined local authority and Scottish Parliament elections on 3 May 2007. See: The Electoral Commission, *Scottish elections 2007: The independent review of the Scottish Parliamentary and local government elections 3 May 2007* (2007): https://www.electoralcommission.org.uk/sites/default/files/electoral_commission_pdf_file/Scottish-Election-Report-A-Final-For-Web.pdf [accessed 8 February 2022]

years.²⁹ It restricts to three years a grant of an application to vote by post by a proxy voter in UK parliamentary elections or local government elections in England.³⁰

22. Clause 6 and Schedule 4 restrict the number of people for whom a person can act as proxy voter. This is currently open-ended. The Bill will limit any person to voting by proxy for no more than four voters, only two of whom may be UK-based voters. The other two, or indeed all four, may be overseas or service voters.³¹
23. Paragraph 8 of Schedule 4 gives the Secretary of State power by regulations to end existing proxy vote permissions and to require reapplications for a proxy vote under the new rules, imposing the four-vote limit.³² Violation of these rules would be an offence punishable by an unlimited fine.³³ Clause 7 extends the requirement to maintain the secrecy of voting under section 66 of the Representation of the People Act 1983 to postal and proxy voting. In particular, the person voting by proxy could not communicate the voter's voting choice to another person.³⁴
24. **We note the provisions on postal and proxy voting, which make the system less vulnerable to abuse. The elimination of electoral abuse is an important issue and the House may wish to consider whether the proposed limits on proxy votes might inadvertently encourage the abuse of postal votes.**

Undue influence

25. Clause 8 changes the law on the offence of undue influence, with further detail in Schedule 5.
26. The new provision builds on existing intimidatory behaviours that are illegal and adds a moderated election-related offence of “undue influence” as a corrupt practice.³⁵ The offence includes, among other things, threats of violence, deception and causing “spiritual injury” to a person or placing a person under “undue spiritual pressure”.³⁶
27. The offence includes a wide test of “doing any other act designed to intimidate a person”.³⁷ This in effect creates a new and potentially broad offence of intimidation. Clause 8(4) sets out a non-exhaustive list of activities falling within the offence. It does not specify that the ‘victim’ of the offence must be a candidate in order for the offence to be aggravated by ‘hostility’. The Government explains: “This means that an offence could be aggravated by

29 [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], para 25

30 [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], para 227

31 [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], para 254

32 [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], paras 270–72

33 [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], paras 256–60

34 [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], paras 276–79

35 [Elections Bill](#), clause 8(1) [HL Bill 96 (2021–22)]

36 [Elections Bill](#), clause 8(4)(e) [HL Bill 96 (2021–22)]. The Government has explained that ‘undue spiritual pressure’ includes (for example) the suggestion that to vote or not to vote for a particular candidate or party: (a) is a duty or obligation arising from the spiritual or religious beliefs that a person holds or purports to hold; (b) improves or reduces a person's spiritual standing or wellbeing; (c) has specific spiritual consequences, either positive (e.g. going to “heaven” or similar) or negative (e.g. damnation); (d) has other consequences of a spiritual nature, such as exclusion from the membership of an organised belief system. See: [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], para 219

37 [Elections Bill](#), clause 8(4)(e) [HL Bill 96 (2021–22)]

hostility for the purposes of subsection (1)(c) where (for example) an offender commits a relevant offence against person A (e.g. a candidate's parent) and that offence is motivated by the offender's hostility towards person B because B is a candidate."³⁸

28. Undue influence will continue to be a corrupt practice. A person convicted of it is liable to up to one year's imprisonment or a fine, or both, under the Representation of the People Act 1983. Such a person, or a person named personally guilty in the report of an election court, is incapable of being elected to or holding certain elective offices for five years.³⁹ Schedule 5 extends this restriction to various offices across the UK.
29. There is a constitutional interest in protecting the integrity of elections and the rights of those participating in them. There is, however, a potentially competing interest in protecting freedom of expression around elections, including robust debate with, and criticism of, those standing for election. The Government states that the provision is not intended to "impede or curtail genuine, robust political expression or debate" and argues that the provision is compatible with the European Convention on Human Rights.⁴⁰
30. **We note that the Government does not intend the strengthening of the corrupt practice of undue influence in clause 8 to cover normal robust campaigning. The House may wish to consider whether further clarification might be helpful to the courts in assessing the threshold of behaviour beyond which a crime has been committed.**
31. **The concept of "spiritual injury" is novel and lacks legal clarity. This may work to the disadvantage of some religious groups more than others. The House may wish to consider whether statements or directions made by a religious office-holder might too easily be thought to be an offence when made in the context of an election campaign.**

Part 2: Overseas electors and EU citizens

32. At present British citizens living abroad can register to vote for up to 15 years after the date on which they leave the UK, and registration must be renewed annually under the Representation of the People Act 1985.⁴¹ This limit is removed by clause 12, as is the requirement that these voters be recorded on a parliamentary electoral register in the UK before leaving the UK.⁴² Clause 12 replaces the requirement for annual renewal of an overseas voter registration with a power to allow renewals to last for up to three years.
33. EU citizens legally resident in the UK are currently able to register for local government elections and other elections that use the local government franchise. Clause 13, giving effect to Schedule 8, maintains this right for an EU citizen resident in the UK before the end of the transition period (31 December 2020) that followed the UK's departure from the EU who is "a qualifying EU citizen or an EU citizen with retained rights". Voting rights

38 [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], para 432

39 [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], para 31

40 [ECHR memorandum for the Election Bill](#), paras 46–60

41 The time limit of permissible absence from the UK has varied at different points since the 1985 Act was passed.

42 A requirement that applied unless they were children when they left the UK.

also extend if the United Kingdom has a bilateral agreement with a person's home country.⁴³

34. **We draw the changes to the electoral rights of overseas electors and EU citizens to the attention of the House.**

Part 3: The Electoral Commission

35. Clause 14 amends the Political Parties, Elections and Referendums Act 2000 to make changes in relation to the Electoral Commission. The Commission is an independent body tasked with overseeing elections and regulating political finance in the United Kingdom. Currently, the Commission sets its own strategic priorities, subject to its statutory requirements, and is accountable to Parliament via the Speaker's Committee on the Electoral Commission.
36. Clause 14 would give the Government power to set the Electoral Commission's strategic priorities by a strategy and policy statement. The new provisions set out what the strategy and policy statement may contain, including "guidance relating to particular matters in respect of which the Commission have functions" and "any other information (for example, about the roles and responsibilities of other persons) the Secretary of State considers appropriate." The Commission must have regard to the strategy and policy statement when carrying out its functions and must publish a report on consideration given to the statement in the exercise of its functions.
37. The Government argues that the changes introduced by clause 14 will not affect the Electoral Commission's role as an effective regulator but will make it more accountable to Parliament.⁴⁴ Critics contend that the strategy and policy statement power will "empower the regulated over the regulator".⁴⁵ The Electoral Commission has voiced concerns that the provision could affect its independence; its Director of Electoral Administration and Guidance stated that the strategy and policy statement will go "beyond scrutiny and accountability, and potentially into providing guidance about how we carry out our functions on a day-to-day basis."⁴⁶
38. The Public Administration and Constitutional Affairs Committee criticised these proposals and recommended that parliamentary approval of the strategy and policy statement should be subject to a super-affirmative procedure.⁴⁷
39. **We are concerned about the desirability of introducing a Government-initiated strategy and policy statement for the Electoral Commission. The proposal will open up to risk the independence of the Commission. Furthermore, it would be dangerous if the perception were to emerge**

43 Bilateral agreements exist with Spain, Portugal, Poland and Luxembourg. Voting rights also extend separately to citizens of the Republic Ireland, Cyprus and Malta: citizens of the latter two states retain voting rights as Commonwealth citizens.

44 HC Deb, 21 October 2021, [Col 280](#) [public bill committee]

45 The Constitution Unit, *Monitor 78: Constitutional uncertainty on multiple fronts* (July 2021), p 7: https://www.ucl.ac.uk/constitution-unit/sites/constitution_unit/files/monitor_78.pdf [accessed 9 February 2022]

46 Evidence of Ailsa Irvine, Director of Electoral Administration and Guidance, the Electoral Commission, to the House of Commons Public Bill Committee. HC Deb, 15 September 2021, [col 45](#)

47 Public Administration and Constitutional Affairs Committee, *The Elections Bill* (5th Report, Session 2021–22, HC 597), para 167. There are various types of super-affirmative procedure. Typically, they involve a minister presenting a proposal for a statutory instrument and an explanatory statement. Committees in the House of Commons and the House of Lords consider the proposal and can make recommendations. It is then open to the minister to formally present ('lay') a draft of the statutory instrument under the affirmative procedure.

that the Commission is beholden to the Government for its operation and delivery. The House may wish to consider in some detail the effect that the provisions in clause 14 could have on the Commission's independent role in the electoral system, and the clarity of that independence to voters and campaigners.

40. *If this provision is retained, we endorse the recommendation of the Public Administration and Constitutional Affairs Committee that the strategy and policy statement should be subject to a super-affirmative procedure to ensure that parliamentarians can comment and make recommendations on a draft statement before it is laid for approval.*
41. Clause 15 provides the Speaker's Committee on the Electoral Commission with a new power to assess compliance by the Electoral Commission with the new strategy and policy statement.
42. The new role for the Speaker's Committee is significant, moving beyond an objective auditing function and introducing a value judgement in assessing compliance with the strategy and policy statement. The Government argues that Parliament should have an increased role in scrutinising the Electoral Commission, referring to Lord Pickles' report, which criticised the lack of a third-party check on the performance of the Commission.⁴⁸
43. Clause 16 amends the membership of the Speaker's Committee to allow concurrent membership for the Secretary of State for Levelling Up Housing and Communities and a Minister of the Crown.⁴⁹ This potentially alters the balance on the Committee, although it will remain the case that five of its members are appointed by the Speaker. In evidence to the Commons public bill committee, the chair of the Public Administration and Constitutional Affairs Committee, William Wragg, who is a member of the Speaker's Committee, argued that "the Speaker's Committee would benefit from having no majority from a particular party."⁵⁰
44. **The membership of the Speaker's Committee on the Electoral Commission, where not set out in statute, is a matter for the House of Commons and in particular the Speaker. We draw the House's attention to the change proposed in clause 16. It may wish to consider whether this is desirable.**

Part 6: Information to be included with electronic material

45. Imprints are required by law to be added to printed campaign material during elections or referendums in order to inform voters who is targeting them. Clause 37 extends imprint rules to digital campaign material—a change already made to the law in Scotland.

48 Cabinet Office, *Securing the ballot: Report of Sir Eric Pickles' review into electoral fraud* (12 August 2016), para 223: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/545416/eric_pickles_report_electoral_fraud.pdf [accessed 8 February 2022]

49 The Committee is currently composed of nine members: the Speaker, the Chair of the Public Administration and Constitutional Affairs Committee, the Secretary of State for Levelling Up, Housing and Communities, the Minister with responsibility for local government, and five MPs, who must not be ministers and who are appointed by the Speaker. There is no requirement for party balance; currently the Committee has a Government majority.

50 HC Deb, 7 September 2021, [Col 222](#) [public bill committee]

46. Clause 46 stipulates that where electronic campaign material is published without an imprint the promoter of the material and any person on behalf of whom the material is being published potentially commits a criminal offence.⁵¹
47. **We welcome the mandatory introduction of imprints on digital campaign material. We would, however, welcome greater clarity on how clause 37 will be enforced and steps that will be taken to prevent the deployment of fake imprints. The House may wish to seek greater assurance on the safeguards that will be put in place to ensure ongoing protection from abuses, which can evolve rapidly over time.**

51 [Explanatory Notes to the Elections Bill](#) [HL Bill 96 (2021–22) -EN], para 647

APPENDIX 1: LIST OF MEMBERS AND DECLARATIONS OF INTEREST

Members

Baroness Doocey
 Baroness Drake (Chair)
 Lord Falconer of Thoroton
 Lord Faulks
 Baroness Fookes
 Lord Hennessy of Nympsfield
 Lord Hope of Craighead
 Lord Howarth of Newport
 Lord Howell of Guildford
 Lord King of Bridgwater
 Lord Robertson of Port Ellen
 Lord Sherbourne of Didsbury
 Baroness Suttie

Declarations of interest

Baroness Doocey
No relevant interests
 Baroness Drake (Chair)
No relevant interests
 Lord Falconer of Thoroton
No relevant interests
 Lord Faulks
Barrister in practice
 Baroness Fookes
No relevant interests
 Lord Hennessy of Nympsfield
No relevant interests
 Lord Hope of Craighead
No relevant interests
 Lord Howarth of Newport
User of postal vote.
 Lord Howell of Guildford
No relevant interests
 Lord King of Bridgwater
No relevant interests
 Lord Robertson of Port Ellen
No relevant interests
 Lord Sherbourne of Didsbury
No relevant interests
 Baroness Suttie
No relevant interests

A full list of members' interests can be found in the Register of Lords' Interests: <https://members.parliament.uk/members/lords/interests/register-of-lords-interests>

Professor Stephen Tierney, University of Edinburgh, and Professor Alison Young, University of Cambridge, acted as legal advisers to the Committee. They declared no relevant interests.