

Written evidence submitted by Solace [ELR 007]

Solace is the representative body for more than 1,600 chief executives and senior managers working in the public sector in the UK, committed to promoting public sector excellence. Our objectives include influencing the debate about the future of public services and ensuring that policy is informed by the experience and expertise of our members, many of whom are Returning Officers (ROs) and Electoral Registration Officers (EROs).

This submission represents the views of Solace's Policy Board, which consists of 26 serving local authority chief executives and senior managers. Solace Policy Board spokespeople for elections and democratic renewal have been heavily involved in discussions with the Cabinet Office, DLUHC and Electoral Commission in the last few years, including concerning the development of the Elections Act 2022.

We have set out below evidence in relation to the themes the Committee seeks to explore. The key points we wish to highlight are:

- A fundamental review of electoral registration must start with questions of principle – in particular, does the current system work? The answer to this must be no. The current system of electoral registration is fragmented and unfit for purpose. Despite the best efforts of EROs and councils, the UK's electoral registers remain inaccurate and incomplete, with millions of people incorrectly registered or not registered at all. We believe that the answer should be the introduction of a single national electoral register.
 - Options such as automatic registration and an online registration system should also be explored to address the systemic failures of the current system.
 - In concurrence with the Association of Electoral Administrators, we believe that a comprehensive approach is the only way to successfully reform the electoral process and ensure the needs of all electors are met.¹ We endorse many of the recommendations of their Blueprint for a Modern Electoral landscape so far as they relate to registration.
 - Some of the changes passed in the Elections Act 2022, for example the requirement for voter ID, will create additional administrative burdens for electoral teams, ROs, polling station staff and councils, particularly in the run up to elections when resources are already stretched. Specifically in relation to registration activities, the removal of a time limit beyond which overseas voters cannot be registered and the new requirement for absent voters to renew their application for a postal vote will significantly increase the workload for staff responsible for maintaining the register so that everyone who is entitled to vote is able to do so. Given the huge financial pressures that local authorities are under, it is crucial that the additional funding provided by Government to fulfil these changes must fully reflect the actual costs incurred.
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Inquiry themes 1 & 5: Data issues; Engagement and accessibility issues

Electoral registers

- In discussions about elections and referendums the focus is often on the voting process, however registration is the gateway to democracy and the accuracy and completeness of electoral registers are central to the health of our electoral system as a whole.
- As highlighted by the Committee, research by the Electoral Commission in 2019 found that around 17% of eligible voters in the UK are not correctly registered at their current address, as many as 9.4 million people, whilst more than 1 in 10 entries on the registers is inaccurate.²
- There is no national electoral register in the UK. Instead, a total of 371 registers are compiled and maintained, primarily by Electoral Registration Officers (EROs).
- There is no system of communication between these registers, therefore duplicate registrations may exist. When voters move, they must register at their new address rather than simply logging on to a central system and updating their details.
- **The current system of multiple registers is unfit for purpose. A single central register, managed locally, would go some way to resolving the issue of duplication. It would also allow voters who move address to simply log-on and update their details, encouraging registration year-round and reducing the pressure on EROs and ROs in the run-up to an electoral event.**
- The misuse and sale of electoral registers must also be addressed. As the AEA have previously stated, organisations should not be able to use registers – which are compiled at public cost – for commercial gain.³
- Somewhat anomalously, there are real restrictions on how the ERO's local authority can use that same data. Broadly speaking, local authorities may only share the full register for the purposes of prevention or detection of crime and not for the performance of other statutory duties. This creates difficulties for EROs and councils. For instance, during the pandemic central government guidance had to be sought to provide some "cover" for EROs wanting to share for the purposes of contacting residents who were shielding.

Registration system

- There are many flaws in the current online registration system. For example, it allows electors to submit an application to register even if they are already registered to vote, either in their home authority or elsewhere.
- This leads to a significant number of duplicate applications, the processing of which absorbs administrative resources in the run up to electoral events, when EROs/ROs are already particularly stretched.
- The current system also allows someone to be legitimately registered in two places, for instance students can register in both their university town and their home address. Although it is unlawful to

² [Registering the missing millions](#)

³ [AEA Policy Positions 2022](#)

do so, this does in theory at least allow them to vote twice, either by travelling between locations or by having an absent vote at one of their registered addresses.

- Ultimately, whilst EROs and councils work to get all who want to vote registered, there remain significant gaps, with millions of people absent from the registers. This is a particular issue in areas with high concentration of certain demographic groups, for example young adults, private renters and students.
- Overall, we agree with the Electoral Commission that the current registration system is in desperate need of modernisation and reform to ensure as many people as possible are registered, and registered correctly.⁴
- As it is a criminal offence not to respond to a canvass form, and a civil penalty can be imposed if someone fails to respond to an invitation to register, to an extent there is already compulsory registration in this country.⁵ However, in practice very few councils carry out enforcement measures in such cases, and arguably the onus should not be on individual EROs to do so.
- **Consideration should be given to national approaches that ensure as many people as possible are registered, and therefore able to vote. For example, automatic registration, linked to the system currently in place for health and national insurance purposes, or registration when engaging with other public bodies.**
- **An online registration system, which automatically checks whether a person is already correctly registered to vote before submitting a new application, would address this issue. A similar system is in place in comparable democracies such as Australia, New Zealand and Ireland.**
- Integrating electoral registration applications into transactions with other public bodies, such as the NHS, would also make it easier for voters to ensure their registration details were accurate.

Inquiry theme 3: Impact on local authorities

Voter ID

- Changes passed in the Elections Act 2022, in particular those relating to voter ID, will have a significant impact both for access to democracy and on local authority resources.
- According to research commissioned by the Cabinet Office, over two million voting age people either do not own any form of ID or have ID that would not be accepted at polling stations.⁶
- This is particularly significant in certain demographic groups, for example people experiencing homelessness, the unemployed, people with learning difficulties and those who have not previously voted. This means that certain groups of more vulnerable voters may be disenfranchised.
- The issuing of Voter Authority Certificates (VACs) for those without suitable ID will require further administrative resources just prior to the poll, exacerbating significant existing pressures on councils, EROs and ROs.

⁴ [Electoral registration in Great Britain in 2021](#)

⁵ RP (E&W) Regs 2001 - Reg 23 and RPA 1983 Section 9E (7)

⁶ [Photographic ID Research – Headline Findings](#)

- **The level and distribution of funding provided to local authorities to meet these additional burdens must reflect the actual costs incurred.**
- **Due to the complexity of these changes, the assessment of financial impact should not be a one-off exercise, but should be reviewed again after the legislation has been fully implemented, and adjusted accordingly.**
- Councils will also be required to re-train polling staff to implement the new changes, for example in turning people away who do not possess suitable ID and making judgements about an individual's physical appearance.
- We echo concerns raised by the AEA and the LGA that insufficient time has been given to properly introduce these requirements, and electoral officers will be under huge pressure to process VACs in time for the local elections in May.
- Whilst considerable attention has been focussed on the questions of voter identification, some of the other changes introduced by the Elections Act also have far reaching consequences for registration activity. For local authorities where there are a large number of overseas electors, the removal of the 15-year limit for registration opens the door to many more applications that need to be processed. Typically, despite the best endeavours of the Electoral Commission to encourage proactive registration, the majority of new applications will be made in close proximity to a UK Parliamentary Election, at a time when electoral teams will already be under tremendous pressure.
- For an overseas British Citizen to register, they must at some point in the past have been on an electoral register for a place within the relevant constituency. However, there has been no requirement to keep physical copies of a register indefinitely so it may prove very difficult for EROs to verify this, depending on the length of time involved. The ERO will also need to be satisfied that the applicant has not been on a register in another area since they were last registered in the ERO's area. The lack of any national register makes it impossible for an ERO to check whether that is the case.
- The Act also allows an overseas voter to register if, although they had never been previously registered, they can either demonstrate that they previously lived in the relevant area or could have declared a local connection with it.
- These requirements raise real questions about the extent of any duty on the ERO to "interrogate" the information contained in the overseas elector's declaration of qualification.

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