

AN ACCIDENT WAITING TO HAPPEN? VOTER ID IN THE 2023 ENGLISH LOCAL ELECTIONS

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Executive summary

In 2022 the UK government legislated that voter ID be a requirement in UK (Westminster) elections, as well as for other elections over which it has jurisdiction – namely English local elections and Police and Crime Commissioner elections in England and Wales.

Following enactment, secondary legislation has recently been moved such that voter ID will come into effect in England ahead of the May 2023 local elections. This will see the largest change in polling stations for many years. All voters will be required to produce one of several forms of ID in order to be issued with their ballot in a polling station.

This report, following an assessment of the reasons behind the Elections Act and the growing concerns of the UK Government over electoral integrity, identifies deep concerns over the deliverability of the new policy in the May 2023 English local elections. This is based on an interview with a leading election administrator and a survey of those councils holding elections in May. 70 councils responded to the survey, ranging from large metropolitan authorities to small rural districts.

According to survey respondents, a significant number of councils are not confident that they can train staff to check ID to ensure those with a right to vote are able to vote. 45% saying they were either ‘not at all confident’ or ‘not so confident’ that they could train staff on the new voter ID requirements.

In response to the question, ‘are you worried that delivering this part of the new election procedure will lead to problems in polling stations?’ not a single respondent said they were ‘not at all worried’. Over 57% said they were ‘very or extremely worried.’

There are expectations among elections staff that the take up of the new voter card, more likely to be an A4 piece of paper, will be relatively high. The average expectation among elections staff is

that 16% of the voting population will apply, meaning potentially millions of applications, with the stated deadline for applications being just a few working days. By comparison, the established deadline in Northern Ireland, population 1.9 million, is 6 weeks.

When asked how confident they were that staff would be ready to run the 2023 local elections before the secondary legislation was published, an overwhelming 86% of responding elections staff said they were either 'not at all confident' or 'not so confident'.

Finally, the survey asked, 'The Election Act 2022 brings in changes for elections and elections administrators - do you think these changes make your job easier or more difficult?' In response, not one respondent stated that the changes would make their job easier. The group was split equally – 50% stated that the changes would make their jobs 'much more difficult', the other 50% said it would simply make it 'more difficult'.

Elections administrators are extremely concerned about their own capacity to deliver voter ID in May 2023. This report assesses how the government came to this decision and how concerned the public should be, ahead of May, as to the capacity of the elections community to deliver important council elections without significant numbers of voters being either disenfranchised through lack of information about the new procedures, or lacking the appropriate ID.

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Abstract

This report examines the potential impacts of the Elections Act 2022 and the introduction of the requirement to show ID to vote in Great Britain. The importance of electoral integrity became part of the debate surrounding UK elections following the 2016 Pickles Report and attendant concerns over the robustness of the electoral process in this country. The Elections Act 2022 introduced the requirement for voters to show ID when voting in polling stations, with its introduction in the English local elections in 2023. This will potentially result in a significant extra burden on electoral administrators who will be required to implement this policy, on 4 May 2023. This report assesses, through interviews and surveys of those electoral administrators, the potential challenges faced by elections staff and the impacts these changes will have on future elections in Great Britain.

Introduction – The background to change

“Electoral Integrity” is something that has often been taken for granted in Great Britain. Our own perception of our elections is that they are robust, free, fair, and open to all those who are qualified to vote in them. A succession of reforms in the nineteenth century saw working men win their right to vote and as the twentieth century progressed women and younger people won their right to vote as well. However, the methodology creating the voter’s experience of elections has not dramatically changed since the Ballot Act 1872, which saw the right to vote in secret become enshrined in UK law.

Although we now have rules that allow postal voting for many, most voters still go along to their local allotted polling station between 7am and 10pm on election day, show their polling card (not that they even need it or even need to take it with them), state their name and their address, and assuming no one under that name, at that address, has already voted, they will be issued with a ballot paper. They then proceed to a polling booth and complete their vote, usually with just a cross in one box on their ballot, before depositing it in a sealed ballot box. The system is tried, tested and perhaps most importantly – trusted. Voters in Great Britain, noting the exception of Northern Ireland where voter photo ID is required, have no need to have any proof of who they are to vote, except to state their name and address. To the international observer this may seem bizarre, even concerning, but until recently this has been accepted, normal practice in our democracy.

Despite Toby James and Alistair Clark arguing that ‘problems with electoral integrity are often found in polling stations, as well as other stages of the electoral process,’ there has apparently been little concern over electoral integrity in our jurisdiction.¹ However, a debate has arisen in the past ten years which culminated in the report by Sir Eric, now Lord, Pickles’ report into electoral fraud, *Securing the Ballot*. This report proposed a raft of recommendations on how to improve the nation’s electoral integrity, of which the

¹ Toby James and Alistair Clark, ‘Electoral integrity, voter fraud and voter ID in polling stations: lessons from English local elections’, in *Policy Studies XL* (2019), p. 191.

eighth was ‘for electors to have to produce personal identification before voting at polling stations.’² This has now been legislated for by the UK Government in the Elections Act 2022. Following the recent promulgation of secondary legislation, voters will be required to show one of a number of forms of ID when attending a polling station before they can be issued with a ballot paper.³ As Fieldhouse et.al. state, ‘the ostensible reason for introducing stricter voter identification requirements is to prevent fraud and thereby improve confidence in the integrity of elections.’⁴ As Ana Alonso-Curbelo argued in a paper assessing the arguments around the parliamentary debate on the introduction of voter ID, ‘considering the potential impact of voter ID on certain groups, the Electoral Commission has warned that the mixed evidence from the voter ID trials do not allow for definite conclusions to be drawn on the impact of voter ID on voter confidence and turnout if the requirements were to be introduced at a national level.’⁵

This paper does not seek to revisit the debates of the pros and cons of the requirement to show ID to vote in future elections, but what is clear from official and academic publications is that a certain percentage of the population who do not have an appropriate form of photographic ID will need to be issued with one to vote in polling stations. This will take the form of an A4 photo ID sheet of paper which will likely be processed by local councils and issued by a central government contractor. Applications for this ID will be accepted up until five days before polling day.⁶

2 Eric Pickles, ‘Securing the ballot’, *Report of Sir Eric Pickles’ review into electoral fraud* (2016), <https://www.gov.uk/government/publications/securing-the-ballot-review-into-electoral-fraud>, accessed: 15 October 2022.

3 See Appendix C.

4 Edward Fieldhouse, Christopher Prosser, Jack Bailey & Jonathan Mellon, *Who Lacks Voter Identification? The Electoral Implications of the UK Elections Bill 2021* (2021), p.2, <https://ssrn.com/abstract=3966155>, accessed: 23 October 2022.

5 Ana Alonso-Curbelo, ‘The Voter ID Debate: An Analysis of Political Elite Framing in UK Parliament’ in *Parliamentary Affairs* 00 (2022), p. 19.

6 Paul Scully MP to William Wragg MP, Letter (30 August 2022), https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101910/Minister_Paul_Scully_to_PACAC_on_Elections_Act_implementation.pdf, accessed: 19 October 2022.

This paper looks at how, and if, this policy is deliverable ahead of the 4 May 2023 local elections in England. These elections will effectively be a testing ground for the introduction of voter ID, as the UK government does not have jurisdiction over local elections in the devolved administrations but does for English local elections and Westminster parliamentary elections.⁷ Using extensive surveys of those responsible for delivering these changes, namely electoral administrators across the councils holding elections in 2023, this paper identifies significant concerns from those tasked with conducting elections ahead of the May polls. Their concerns range from the diversion of staffing to organise the processing of ID applications, to the retraining of polling staff in polling stations who will have to be able to identify the various forms of ID, to the challenges that will be faced using traditional venues that may not be able to provide the necessary context to check the ID for some voters – especially those with face coverings. This paper does not attempt to address all these challenges, but instead places the increased burdens on electoral staff at the centre of the discussion about the implementation of this policy in 2023 and beyond.

Above all this paper identifies an aspect of local government, electoral services, which is deeply concerned about its capacity to deliver elections to the high standards that are expected of them. A so-called ‘no-fail’⁸ service will be put under stress by this new legislation, and the administrators themselves report concern that the Elections Act 2022 has made their work immeasurably more complex and challenging.

In a year of significant events and anniversaries, it might not instantly occur to most readers that 2022 sees the 150th anniversary of the 1872 Ballot Act which introduced the secret ballot to parliamentary and municipal elections.⁹ The traditional method of declaring one’s vote in public was swept away and voters could,

7 Perhaps counterintuitively, it also possesses jurisdiction for Police and Crime Commissioner elections in England and Wales.

8 Association of Electoral Administrators, Letter from Peter Stanyon to Rt Hon Greg Clark MP (Secretary of State) (11 July 2022), <https://www.aea-elections.co.uk/wp-content/uploads/2022/07/Letter-to-Sec-of-State-Elections-Act-2022.pdf>, accessed 16 October 2022.

9 Ballot Act 1872.

for the first time, vote in private. It moved power away from those wishing to buy votes such as landowners and from the candidates themselves. It constituted a fundamental shift in the way elections were conducted, giving newly enfranchised skilled workers greater independence. The main objective of the Act was to keep the voter ‘free from illegitimate influences’ while securing for him (because it was only him):

‘..the full force of all those legitimate influences arising from the education, the character and the tone with whom he lived. Far from exposing the voter to democratic influences the object of the bill was to protect voters from agitators and mob orators just as much as from electoral patrons. The ideal of the Act, therefore, was an independent voter freed from influence from below as well as from above.’¹⁰

Being one of the Chartists original six points, when ‘skilled men won the right to vote in 1867, concerns were raised that they would be susceptible to undue pressure from employers and landlords. Many had opposed secrecy at the ballot box, claiming that it was “unmanly”, while the former Prime Minister Lord John Russell (by now Earl Russell) argued that such a move was “an obvious prelude from household to universal suffrage”.¹¹

Moving forward exactly 150 years to the present day we see the introduction of another piece of legislation which will change the manner by which we vote: The Elections Act 2022.¹² Amongst its many innovations and changes is the introduction of the requirement to show ID when attending a polling station. Whilst there is a perception that ID to vote is a new invention in the UK electoral context, it has been a requirement to show ID in Northern Ireland since 1983 and for photographic ID to be shown since 2002.¹³

10 Romain Bertrand, Jean-Louis Briquet & Peter Pels, *The Hidden History of the Secret Ballot – The Secret Ballot in the Nineteenth century* (Hurst, 2007), pp 30-31.

11 *The Six Points*, <https://www.chartistancestors.co.uk/six-points/>, accessed 16 October 2022.

12 Elections Act 2022.

13 Electoral Fraud (Northern Ireland) Act 2002, c. 13.

2023 will see the introduction of photographic ID to vote for the first time in Great Britain across 151 district councils, 46 unitary authorities and 32 metropolitan boroughs in England ahead of its use across the UK in the 2024 UK general election.¹⁴ As there are no local council elections in Scotland and Wales in 2023 this will be an England only event. The Westminster parliament is not competent to legislate for the devolved nations, and as such, ID will be required in Westminster elections in Scotland and Wales, but not at their national and local elections.

The discussion over the introduction of voter ID is not a new one in Great Britain, nor is the impact of electoral fraud in UK elections. As Sir Eric Pickles reported in 2016:

‘International organisations such as the Office of Democratic Institutions and Human Rights within the Organisation for Security and Co-operation in Europe which observe elections across the world have raised concerns about trust-based electoral systems and the vulnerabilities to fraud they have seen in the UK’s systems. We need to recognise and respond to such assessments.’¹⁵

He continued:

‘The abuse [in Tower Hamlets] was facilitated by weaknesses in the system that is employed throughout Great Britain. We take our democratic institution for granted. We need to make sure that people trust the system and that perceptions can play as big a part in undermining the system as well as actual proof of fraud.

Electoral fraud and corruption is *[sic]* intertwined with other forms of crime as well. Local authorities have a large procurement role. A group of people who cheat their way to power are unlikely to hold a higher moral standard when

14 House of Commons Library, *Voter ID Research Briefing* (26 October 2022), <https://commonslibrary.parliament.uk/research-briefings/cbp-9187/>, accessed 2 November 2022.

15 Pickles, ‘Securing the ballot’, p. 1.

handing out public contracts, or when making quasi-judicial decision on planning and licensing. Electoral registration fraud is connected with financial crime and illegal immigration.

Therefore, we need to be both comprehensive and robust in our approach to tackling fraud and the opportunity for it. I believe that the series of measures put forward in this report for the Government to consider take that approach. They also recognise the need to support engagement and not create undue barriers to democratic participation by legitimate electors.¹⁶

Following Pickles in 2016, the UK Government decided to hold a series of trials to assess the potential benefits of the introduction of voter ID.

As the report on the ID trials in 2019 suggested:

‘The photographic ID model had the most pronounced impact on the measures of integrity. Electors in the authorities trialling the photographic ID model showed a significant increase in their perception that there are sufficient safeguards in place to prevent electoral fraud at polling stations. While this trend was also seen in the mixed ID model after polling day, the photographic ID model is the only model piloted in which significantly more electors were likely to disagree with the perception that there is electoral fraud in polling stations to affect election results.’¹⁷

Following the voter ID trials, there has been a great deal of discussion about the benefits and risks of its introduction to those who might not have the required forms of ID, as well as the chilling effect this may have in discouraging some voters from attending the polls at all. Some of the debate has consequently focused on

¹⁶ Pickles, ‘Securing the ballot’, p. 2.

¹⁷ Cabinet Office, *Evaluation of Voter ID Pilots 2019* (2019), <https://www.gov.uk/government/publications/evaluation-of-voter-id-pilots-2019>, accessed 15 October 2022.

locally produced voter ID cards for those that do not have suitable ID, as indicated in the Cabinet Office's own review of the trials in 2019:

'There is continued anecdotal evidence from the 2018 pilots that the provision of free, locally issued ID allows electors who did not previously have ID to access other public services in their area. This was highlighted as a continued positive benefit in the photographic ID model in Woking from 2018 - where homeless electors were able to use it as locally recognised ID to access the local job centre. These potentially wider benefits of the locally issued ID were also highlighted by the electoral services team in Pendle this year, though electoral services teams highlighted considerations for the broader resource implications of issuing this ID close to polling day.'¹⁸

The OSCE/ODIHR Needs Assessment Mission to the UK general election in 2019 stated,

'Voter Identification Documents (ID) in elections remain a controversial issue among political parties. In order to engage in evidence-based policy making, both the EC and the Cabinet Office are conducting voter ID pilots. While pilot projects have provided important analysis, they do not allow for definitive conclusions to be made in this area.'¹⁹

In turn, James and Clark have provided

'additional evidence that identification requirements can lead some voters not to vote, as the evidence was that some voters were unable to present the necessary form of ID on the day. The frequency of this problem was more common than those turned away for registration reasons. Moreover, some voters did not vote present [sic] voter ID

18 Cabinet Office, *Evaluation of Voter ID Pilots 2019*.

19 OSCE/ODIHR, *United Kingdom, Early General Election, 12 December 2019: Needs Assessment Mission Report* (2019), <https://www.osce.org/odihr/elections/uk/440537>, accessed 16 October 2022.

out of ideological reasons. This presents an important new link between voter identification requirements and turnout which has not been discussed in the literature to date. Importantly, the introduction of voter identification in polling stations reduced the confidence of poll workers that the citizens asking to vote were who they said they were.²⁰

As already stated, this report does not seek to revisit these arguments over the desirability of the introduction of voter ID. Instead, it seeks to assess how the challenges of the implementation of this new policy will, or will not, be overcome ahead of the May 2023 local elections in England. For these, according to the UK Government, it 'detailed secondary legislation [...] needed for voter ID to work in practice, including the new free voter card'.²¹ 'Voter ID requirements should then be in place for local elections in England May 2023 and at any UK Parliamentary election held after that date.'²² As the Minister responsible stated in correspondence with the Chair of the Public Administration and Constitutional Affairs Committee, the Government has been clear it is their plan:

'that voter identification will be in place for polls scheduled to be held in May 2023, and we [will] continue to work towards this delivery date. As you have indicated, a specific advantage of following this timeline is that the provisions are therefore not being introduced at a time when polls are taking place across the entirety of the UK, and so there is an opportunity to learn how the new requirements are best implemented ahead of a time when both delivery and support resources are at full stretch.'²³

In total, 229 councils (151 district councils, 46 unitary authorities and 32 metropolitan boroughs) in England will need to be prepared to conduct elections in 2023 using the new rules. It is only just being finalised how voters will be able to show their ID and, if they

20 James and Clark, 'Electoral integrity', p. 205.

21 This was recently published in early November.

22 House of Commons Library, *Voter ID Research Briefing*.

23 Paul Scully MP to William Wragg MP, Letter (30 August 2022).

do not possess the required ID, how councils will be expected to issue ‘voter cards’ to those that apply for them ahead of the May 4th elections.²⁴

This change to the procedures of voting will create several systemic challenges that those councils with elections will need to overcome ahead of time. How will polling stations change? Will extra staff be required? Will extra training be needed for staff to ensure they have knowledge of the required ID and how to identify voters based on their ID? Will extra staff be needed to deal with the introduction of voter ID? These questions are among those that legislators have hopefully contemplated, but they are ones which electoral administrators will actually have to grapple with and resolve ahead of the English local elections.

Indeed, this concern has been raised by the representative body of election officials in the UK, the Association of Electoral Administrators. In a letter from their Chief Executive to the new Minister responsible, they suggested, ahead of the only recently published secondary legislation,

‘With key policy details still to be confirmed, and secondary legislation yet to be published, the Association of Electoral Administrators no longer believes it is possible to successfully introduce Voter ID in May 2023 [...] The current timetable threatens to lead to voter disenfranchisement and to confuse candidates and campaigners. Through no fault of their own, Electoral Registration Officers, Returning Officers and electoral professionals will struggle to deliver the trusted elections expected of them.’²⁵

This is quite a statement from the representative body of electoral managers in the UK – if voter ID goes ahead in May 2023, the election might not be trusted. He added, in an interview for this report:

24 See Appendix C for a full list of acceptable forms of ID.

25 Association of Electoral Administrators, Letter from Peter Stanyon to Rt Hon Greg Clark MP (Secretary of State).

‘The frustration is the system could be made to work better if there were greater time, if the General Election is to be May 2024, quite rightly, you don’t want to roll out this kind of system just ahead of a General Election, where the stress would be at its greatest. But next May won’t test Scotland, it won’t [test] in Wales, and it won’t test lots of other parts of the country.’²⁶

Looking at the previous voter ID trials carried out in 2018 and 2019 suggests that a large variety of photo ID may be permissible in polling stations. This ranges from the perhaps obvious examples of a passport or a driving licence to less extensively owned ID, such as an MOD Defence Identity Card. However, potentially the most encumbering aspect of the new procedure will be the introduction of the new Voter Card which will be issued to those voters that request or require one. These will be coordinated by local authorities and issued in an as yet unidentified national production process. This procedure will be available up to 5 days before polling day. This ID will be available alongside any other ID that voters already have. They will not need to show both.

As things stand voters are issued with a polling card which tells them about any forthcoming election with the whereabouts of their local polling station and such information as the times of opening and closing. Despite most voters taking these to the polls with them, this is not required. In fact, simply stating one’s name and address is sufficient to vote in the current system in Great Britain. This may come as something as a surprise to many international readers. In less incredulous language, the OSCE/ODIHR has repeatedly recommended that ‘in order to provide additional safeguards for the integrity of polling’ the UK could give consideration ‘to amending the legal framework to require that a person presents a proof of identity and signs the polling station voter register before being given a ballot.’²⁷

26 Interview with Peter Stanyon on 29 July 2022.

27 Office for Democratic Institutions and Human Rights, *UK General Election 5 May 2005 OSCE/ODIHR Needs Assessment Mission Report* (2005), <https://www.osce.org/odihr/elections/uk/115662>, accessed 23 October 2022.

Whilst somewhat couched in the diplomatic language of ‘could’, the UK, or at least Great Britain, has been at odds with other equivalent western democracies when it comes to expecting voters to show ID. However, there is a simple reason for this: the UK does not have a standard ‘national ID card’ as virtually all of the other countries that might give such advice do. Most of the population has some form of ID that fits the requirement, such as a passport or driving licence, but some do not, and this is where the issue of debate arises. If a voter cannot produce a form of ID, then they are effectively disenfranchised at the polling station. This is something that democracy campaigners have identified and objected to as legislation was promulgated and finally completed. The Electoral Reform Society identified, citing Parliament’s Joint Committee on Human Rights, that the introduction of voter ID will fall ‘disproportionately on some groups with protected characteristics under human rights law’.²⁸ They go on to state that with ‘around 2.1 million people lacking the necessary identification for this scheme, according to the government’s own research, voter ID is clearly not a proportionate response to this notional crime.’²⁹ The notional crime they identify being personation, the rather oddly used term to describe impersonating another voter.

According to the Government’s own research:

‘Ninety-eight per cent [of respondents] held some form of photo ID (including ID that had expired or where the photo was no longer recognisable). Slightly fewer (96%) held a form of photo ID with a photo that respondents thought was recognisable (including ID that had expired), while nine in ten (91%) held a form of photo ID that was both in-date and recognisable.’³⁰

28 Jessica Garland, ‘Expensive Voter ID scheme is neither necessary nor proportionate’, *Electoral Reform Society Blog* (22 October 2021), <https://www.electoral-reform.org.uk/expensive-voter-id-scheme-is-neither-necessary-nor-proportionate/>, accessed 15 October 2022.

29 Garland, ‘Expensive Voter ID’.

30 UK Cabinet Office, *Photographic ID Research - Headline Findings*, 31 March 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/984918/Photographic_ID_research-headline_findings_report.pdf, accessed 15 October 2022.

This is apparently corroborated by independent research conducted by academics that:

‘the most commonly owned forms of photo identification are (unsurprisingly) a UK passport (77.6%) and photo driving licence (73.8%)...Combining these into a single indicator, we find that 5.7% of the eligible voter population lack any suitable form of photo identification (excluding 3.2% who answered ‘don’t know’). We refer to this as VID poverty. The overall proportion we find without photographic identification is consistent with the Cabinet Office report published in March 2021 which showed that 4% of respondents to a telephone survey lacked recognisable photo identification, and 9% lacking an in date and recognisable photo ID.’³¹

This all leaves a number of questions that the UK Government, legislators and electoral administrators will have to wrestle with before the introduction of voter ID. Some of these cannot possibly be resolved in this report, but this being the largest change to the way we vote in the UK in 150 years, it seems sensible to try to answer two questions on the assumption that the introduction of voter ID happens in 2023. Are election administrators prepared for this change, bearing in mind secondary legislation has only recently been proposed, at the time of writing, and has not yet been passed? And how large a job will it be to deliver these so-called voter cards to those that seek to have one? With 98% of voters saying they held some form of ID that should fit the requirements this may seem a small consideration, but bearing in mind it constitutes almost a million voters based on recent ONS figures for UK electoral registration, it is one that deserves further examination.³²

31 Fieldhouse, Prosser, Bailey & Mellon, ‘Who Lacks Voter Identification?’ , pp. 4-5.

32 Office for National Statistics, *Electoral registrations for Parliamentary and local government elections as recorded in the electoral registers for England, Wales, Scotland and Northern Ireland* (December 2021), <https://www.ons.gov.uk/peoplepopulationandcommunity/elections/electoralregistration/datasets/electoralstatisticsforuk>, accessed 24 October 2022.

Voter ID as part of a wider debate on electoral integrity

Whilst the debate on voter ID is one that appears to have been settled at the Westminster level, it will only be partially introduced in Scotland and Wales. This is because of the devolved competencies brought about by devolution. Legislation for Police and Crime Commissioners in Wales (as well as England) sits with the Westminster parliament and not the Welsh Senedd. As such, it is entirely possible that voters in Wales will vote on the same day in two or more separate elections, with different ID requirements for those elections. Whilst idiosyncratic in the UK legislative landscape, it does bring into relief a wider debate about electoral integrity and increasing degrees of trust in the electoral process in advanced democracies.

There is something delightfully old-fashioned about being able to enter a polling station without ID or even your polling card, announcing your name and address, and being issued with a ballot paper. It is based on a degree of trust that exists almost nowhere else in our society today. In contrast, voter ID is a normal expectation in every other country I have observed elections in over the past 10 years. There is an expectation that it will be presented and that ID will be required as a basic aspect of being issued a ballot paper.

Of course, it would be myopic to simply look at the electoral practices and traditions of the UK through a lens of tradition trumping the modern world when it comes to electoral administration. As the media has highlighted in the past two years, US elections are some of the best run and well-financed in the world, with multiple and varied methodologies. Ranging from in-person voting to all mail-in ballots with ID requirements and extensive checking and auditing processes, their 2020 Presidential election saw enormous levels of mistrust in their electoral processes. This distrust and eventual antidemocratic action was generated by a belief that the election had been ‘stolen’.³³

33 Natasha Bertrand and Darren Samuelsohn, ‘What if Trump won’t accept 2020 defeat?’, *Politico* (21 June 2019), <https://www.politico.com/story/2019/06/21/trump-election-2020-1374589>, accessed 16 October 2022.

Whilst the circumstances of the US election may not be one that can be replicated in the UK, trust in elections, and how they are administered, is essential to maintaining effective democratic norms and public support. Whilst so-called ‘personation’, where one person assumes the identity of another person, maybe be relatively rare in the United Kingdom, there was one identified case in 2021. There,

‘Kent Police issued cautions to two people for the same offence of personation. A woman used her mother’s polling card to try to vote in a local government election after her father suggested doing so. The polling station staff suspected that she was not the voter named on the polling card. Father and daughter both accepted a caution after the police had obtained advice from the Crown Prosecution Service.’³⁴

This scarcity of personation does not mean that public trust in elections can be taken for granted, though. Whether ID to vote is necessary is arguable, and as already stated not something this paper seeks to revisit, but what can be at least be asserted is that elections across the western world are arguably less trusted as they were a decade ago. Generating greater trust in elections is an important part of ensuring that electoral outcomes are trusted and accepted. As Ana Alonso-Curbelo argues,

‘Despite voter ID being justified as necessary to tackle voter fraud when the new Elections Bill was first announced, this study finds there is a cross party consensus among British elites that actual voter fraud levels in the UK are small. Conservatives nevertheless insist voter ID is necessary to deter potential fraud and strengthen public confidence in the electoral system, and thus not solely for the integrity or well-functioning of the electoral system itself.’³⁵

34 The Electoral Commission, ‘2021 election fraud data’ (11 May 2021), <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/our-views-and-research/our-research/electoral-fraud-data/2021-electoral-fraud-data>, accessed 16 October 2022.

35 Alonso-Curbelo, ‘The Voter ID Debate’, p. 17.

Voter ID has become the crux of the debate over electoral integrity in the UK, but it should be seen as only one aspect or tool in the debate over how to improve elections. If it generates greater trust, that in itself is a useful output of the Elections Act 2022.

ID in Northern Ireland

Despite controversy over the introduction of ID to vote in Great Britain, one part of the UK, Northern Ireland, has had a requirement to produce ID to vote for almost 40 years. The 1983 Representation of the People Act required voters in Northern Ireland to bring a form of non-photographic ID with them to vote, and in 2002 the Electoral Fraud Act (Northern Ireland) strengthened this further by requiring photographic ID to be produced when voting in a polling station.

Following the introduction of photographic ID to vote in 2002, the House of Commons Northern Ireland Select Committee reported that,

‘when giving evidence to the Committee in July 2004, the Electoral Commission as well as the Electoral Office for Northern Ireland (EONI) indicated that the numbers of people without some form of appropriate photographic ID were likely to be relatively low. In its report on the 2002 Act published in December 2003, the Electoral Commission estimated that some 37,000 voters who are on the electoral register do not have the appropriate photographic ID required to vote. At that time, the Commission indicated that every effort needed to be made to increase the take-up of the ID card.’³⁶

They went on to say that,

‘Meanwhile, between 3,500 and 4,000 voters were rejected at polling stations during the November 2003 Assembly elections and the June 2004 European Parliament elections. About half were rejected because their ID, for example, passport or driving licence was out of date. This is not a significant number in the view of the Electoral Office.’³⁷

36 House of Commons Northern Ireland Select Committee 2004, <https://publications.parliament.uk/pa/cm200405/cmselect/cmniaf/131/13106.htm#a19>, accessed 15 October 2022.

37 House of Commons Northern Ireland Select Committee 2004.

The committee concluded:

‘We believe that the introduction of a requirement for voters to show photographic ID at polling stations was right and has been modestly successful. However, a number of voters were unable to cast their votes in the 2003 Assembly and 2004 European Parliament elections because they lacked appropriate ID. This consequence is unfortunate, and we recommend that efforts to increase the uptake of the Electoral Identity Card should be redoubled. Campaigns to remind voters of the requirement for photographic ID need to be repeated regularly, particularly ahead of elections.’³⁸

While it may be argued whether up to 4,000 people being turned away at polling stations represents their disenfranchisement in this instance, the purpose of introducing voter ID itself surely implicitly suggests that some voters will be turned away, arguably this is explicit. The threshold to vote has moved away from a presumption that everyone presenting themselves at a polling station has the right to vote to the position that you should prove who you are to prove your right to vote. Logically, there should be a presumption that some of those presenting themselves at polling stations will be doing so maliciously.

Beyond this point, there are also significant practical issues raised by the Northern Irish example. Originally it was a requirement that any ID issued by EONI be in date when presented at a polling station, the authorities have since relaxed this position. They now state that ‘if your Electoral Identity Card has expired, you do not need to renew it to vote at a polling station – identity documents produced at a polling station are no longer required to be current, as long as the photograph is of a good enough likeness to allow polling station staff to confirm the identity of the holder.’³⁹ This softening is likely because the Electoral Office for Northern Ireland predicts that voter ID will normally take up to six weeks to be processed.⁴⁰

38 House of Commons Northern Ireland Select Committee 2004.

39 Electoral Office for Northern Ireland Website, <https://www.eoni.org.uk/Electoral-Identity-Card/How-to-apply>, accessed 15 October 2022.

40 Electoral Office for Northern Ireland Website.

Recent elections, whether within Northern Ireland or across the UK, can be called and completed within a 6 week period, and thus, whilst using expired ID may seem to slightly undermine the requirement of photographic ID to vote, it is a necessary practical step. As such, voters will not be disenfranchised because their ID is out of date at a rapidly called election.

A reasonable question concerning the EONI's issuing of Electoral Identity Cards would be the scale of the commitment that may be required of councils in Great Britain to administer them before their production, as the EONI states there were '9,961 Electoral Identity Cards issued'⁴¹ during the reporting year 2019/20 and '11,417'⁴² in 2018/19. The former was a year in which there was a UK general election and local elections in Northern Ireland and during 2018/19 there were none. This number of applications, following no doubt a large take up at their introduction would seem to be relatively consistent. This would seem to beg the question, how is this new policy going to be delivered in practice if the EONI takes up to 6 weeks to turn around applications for voter cards in Northern Ireland? How credible is it that all those councils involved in elections in May 2023 will be able to process applications, assuming this is the way it will be done, and for the as yet unappointed, central government contractor being able to print unique ID for potentially millions of voters in the very narrow window of a few working days before polling day?

41 Electoral Office for Northern Ireland Website.

42 Electoral Office for Northern Ireland Website.

Are election administrators in England prepared for 2023?

The representative body of election administrators in the UK is the Association of Electoral Administrators. It is perhaps not the most public of groups, but one which provides local authority elections staff with training, assistance, and electoral law advice. As such, it constitutes a vital part of the network that makes elections work in the UK, where even national elections are carried out by local authorities. The Association recently issued a position statement concerning the changes to elections, caused by the 2022 Elections Act, stating:

‘We urge that consideration be given on how to reduce the burden on EROs [Electoral Registration Officers] and increase access to electoral ID for citizens. Requests from electors will inevitably be made at EROs’ busiest time when they are administering increased levels of registration ahead of an election, often with already stretched resources.

‘We are also concerned a deadline to apply too close to polling day could end up disenfranchising electors who do not receive their ID in time. A short deadline could also become an unmanageable burden on EROs and ROs [Returning Officers], arguably at disproportionate cost to the public purse.

‘For a smooth transition, any electoral ID scheme requires sufficient lead-in time for legislation, administrative planning, and delivery. We believe the Gould Principle must apply – with changes introduced at least six months before a major electoral event. It is also crucial that full national funding is available, with no additional cost burden pushed onto local authorities now or in the future.’⁴³

43 Association of Electoral Administrators, Policy Positions 2021 Overarching, <https://www.aea-elections.co.uk/wp-content/uploads/2022/02/Policy-Positions-2021-Overarching-11-Feb-22.pdf>, p.5., accessed 4 November 2022.

Their Chief Executive, Peter Stanyon, went on to say:

‘Careful consideration is crucial to make sure voter ID is deliverable and does not lead to disenfranchisement, particularly for voters from already underrepresented groups.

‘Voter ID must not negatively impact on people who wish to vote, and must avoid unnecessarily adding to election bureaucracy, costs, and risk. Sufficient lead-in time for legislation, administrative planning, delivery, and voter education is vital to ensure any scheme is successful.

‘It is clear photographic voter ID cards will be necessary, but we believe the responsibility for producing cards should rest with the local authority, not Returning or Electoral Registration Officers, who are already stretched to their limits in pre-election periods. It is also crucial that cards be nationally funded, with no additional cost burden pushed onto councils.’⁴⁴

Since this statement the UK Government has decided that the production of the voter cards will be undertaken by a government contractor, but the collection of details from voters to produce the cards will still have to be undertaken by local council staff. This will unquestionably place heavier burdens on local council staff ahead of the May 2023 local elections, even if those burdens are not as potentially heavy as they first appeared when council staff believed it might be their responsibility to produce the voter card themselves. The Local Government Chronicle reported that ‘research done by Plymouth Council [suggested] it would take an electoral administrator eight minutes to process one application for an ID certificate to be used to vote.’⁴⁵

44 Peter Stanyon, ‘Chief Executive Officer of the AEA 21 June 2022’, <https://www.aea-elections.co.uk/policy-reporting/statements-communications/aea-statement-on-the-elections-bill/>, accessed 23 Oct 2022.

45 Megan Kenyon, ‘Sector isn’t ready to implement Elections Act, senior councillors say’, Local Government Chronicle (24 October 2022), <https://www.lgcplus.com/politics/service-reform/sector-isnt-ready-to-implement-elections-act-senior-councillors-say-24-10-2022/>, accessed 24 October 2022.

As such, as part of my research for this report, I felt a suitable way of assessing the May 2023 elections would be to ask those responsible for administering them how they perceived the elections and their deliverability. May 2023 sees an array of elections across England in different types of councils, some with elections by thirds (where a multi-member ward elects its councillors in sequence, generally over three years) others with all-up elections, some others will have multiple elections, such as mayoral and council elections on the same day.

The survey of local councils was sent from the Constitution Society to all those English local authorities with elections planned for next May. In all but two instances it was possible to find an email address that was publicly available to correspond with. Those responding, because of the sensitivity of the area of research, were given anonymity and some chose to only fill in the sections of the survey they felt able to answer.

Methodology of the survey

The UK has a patchwork timetable of electoral events with different forms of local authorities being responsible for their local elections, if not the cycle of that timetable.

4 May 2023 sees one of the smaller rounds of local elections in England, with 229 local authorities conducting elections. All of those with elections in 2023 are listed in Appendix A of this report. Scotland and Wales have no planned local elections in 2023. Northern Ireland does have planned elections, but these already have an ID requirement and were therefore not a part of this report.

The survey was sent digitally to 227 of the local authorities listed in Appendix A, the other two authorities did not receive a survey as no email address for their electoral services department was publicly available. An initial email was sent to councils on 28 July 2022 and a follow up email was sent on 15 August. Potential respondents were given until 26 August to complete the survey.

A complete set of the questions can be found in Appendix B.⁴⁶ Not all respondents answered all questions and anonymity was offered to those responding to the survey. This anonymity was provided because of the sensitive nature of the subject matter as those responding are responsible for the management and conduct of a fundamental aspect of public life in the UK.

There were 70 individual respondents to the survey, some answering all questions but with many answering some or most. This constitutes a response rate of 30.8%. For the purposes of the data presented a numerical indication has been given for each answer as to the number of respondents who answered each question. The councils responding ranged from large metropolitan councils, covering multiple parliamentary constituencies, to smaller city-based councils as well as rural district councils.

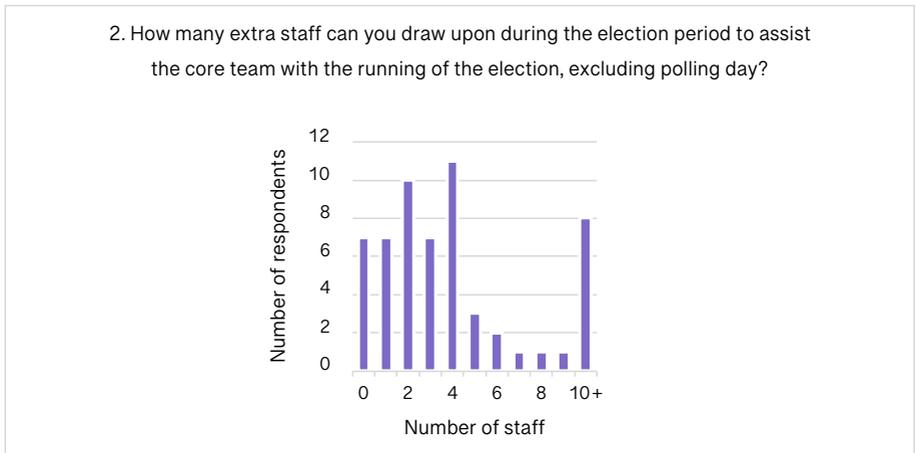
⁴⁶ The numbering of graphs and responses does not equate to the question numbers in the survey, this is for the ease of the reader.

Results of the survey

Whilst some of the questions we posed of local councils were primarily in search of background information, there is an insightful aspect of the data concerning the numbers of staff directly involved in working in local elections offices across England.



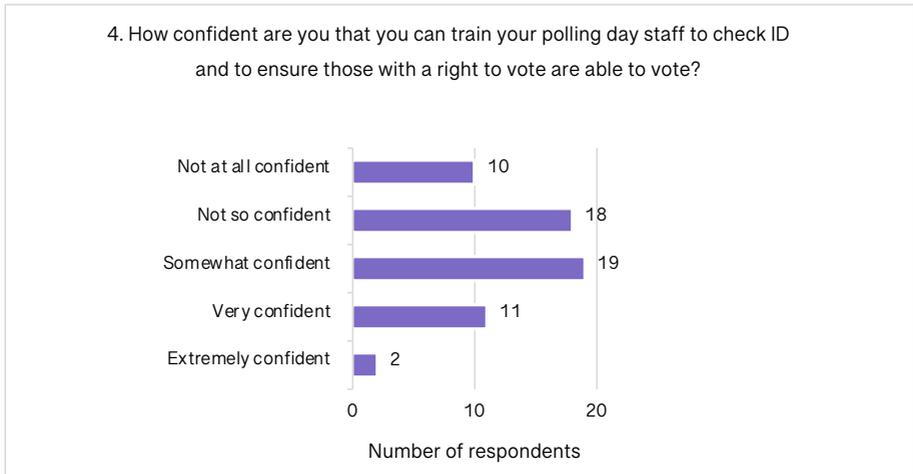
QUESTION 1: Some elections departments are quite large, with the largest reporting having 22 full-time staff. In contrast, some elections offices are very small – indeed some have no full-time staff. The vast majority of those responding had between 2 and 5 members of staff dedicated to working on elections. (N.65)



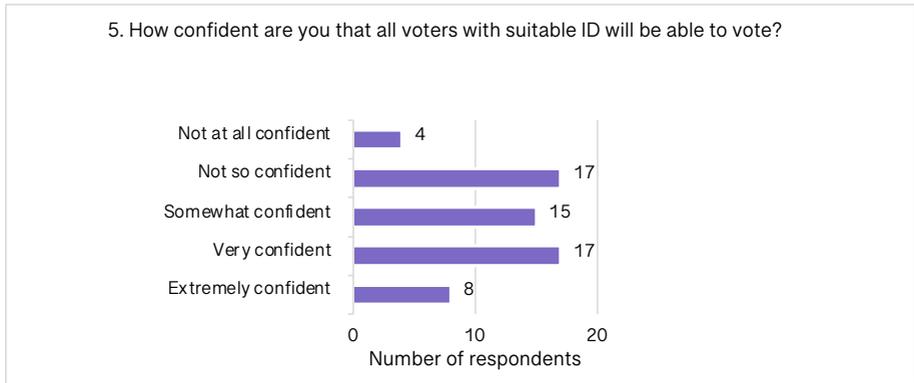
QUESTION 2: Respondents were then asked how many extra staff the elections team could draw on for extra support during the election period itself. Answers ranged dramatically, often relating to the size of the council and its capacity to supply extra assistance. Some councils identified that they could rely on very little extra help, if any, during the election period. (N.61)

QUESTION 3: We also asked the councils how many staff they generally employed on polling day to conduct election day activities. These numbers ranged dramatically, generally dependant on the number of polling stations the local council administers. This data is not issued here as it might be possible to identify the councils who have responded from the data collected in this section of the survey. But across the 62 respondents to the question 3: ‘How many presiding officers, polling clerks and other polling station staff do you employ on polling day?’ – the total number of presiding officers required to administer the elections across the sample of councils was 5901. There were 9693 polling clerks required and an extra 638 who would be responsible for inspecting polling stations for the returning officers. A total of 16,232 staff are required to run the elections across these councils – an average of over 261 staff per council. We cannot directly extrapolate this to all those councils’ running elections in 2023 in England, but we can assess that these tens of thousands of staff will need retraining for the purposes of running elections along new lines including the new voter ID requirements. Consequently, the next question began to assess the impact of voter ID on the process. As Peter Stanyon said in interview, ‘Staff training will need to be completely changed and updated as we can’t simply say, “do what you did last year.”’⁴⁷

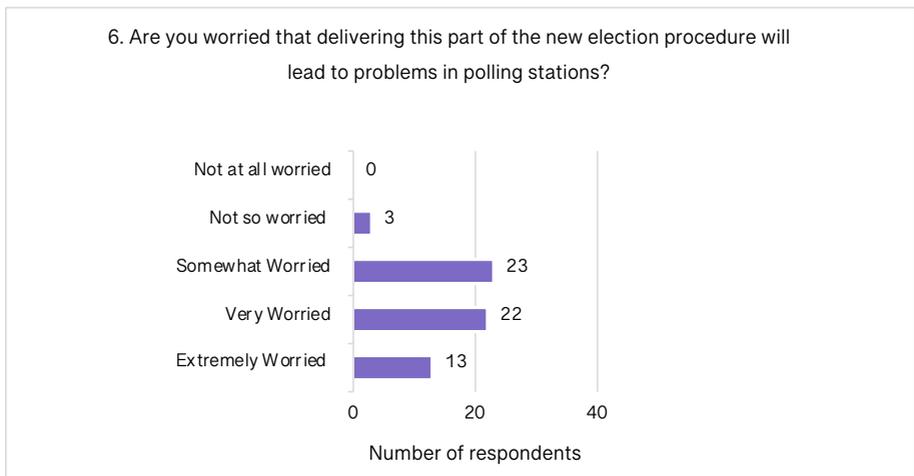
47 Interview with Peter Stanyon on 29 July 2022.



QUESTION 4: In response to the question, it became clear that a significant number of councils are not confident that they can train staff to check ID to ensure those with a right to vote are able to vote. 16% gave the lowest response possible ‘Not at all confident’ with another 29% indicating that they were ‘not so confident’. 18% said they were ‘very confident’ that they could train staff on the new voter ID requirements and only 2 of the 62 responding to this question suggested they were ‘extremely confident’. (N.62) But as Peter Stanyon commented, even this may not be as simple as elections staff are expecting: ‘What will be the challenge is that list of ten documents that someone is able to bring in, which confuse the polling clerk – passports, driving licence and voter ID document will be fine, it’s the others that will be confusing.’¹⁴⁸



QUESTION 5: In response to the question above it seems a significant number of councils are more confident about ensuring that voters who have valid ID will be able to vote than they are in overseeing other areas of voter ID introduction. Only 6% gave the lowest response possible ‘Not at all confident’ with another 27% indicating that they were ‘not so confident’. 27% said they were ‘very confident’ that they could train staff on the new voter ID requirements and 12% responded to this question suggesting they were ‘extremely confident’. (N.61)



QUESTION 6: Those responding to the survey showed high levels of concern that the introduction of voter ID will lead to problems at polling stations on election day. Not a single respondent said they were ‘not at all worried, whereas over 57% said they were either ‘very or extremely worried.’ (N.61)

QUESTION 7: The survey then asked participants whether they felt ‘the council has the necessary equipment to issue voter cards at the moment?’ This question regrettably has less relevance than when it was issued. As one respondent stated in their feedback to the survey, ‘this will now be dealt with mainly by the issue of a central government-based ID. Given the deadline change to - 6 days to poll from - 1 day to poll.’⁴⁹ As Peter Stanyon stated in our interview, ‘the voter ID card will not be a card, it will be an A4 piece of paper...the government has said from the start that they do not want voter ID to be used as any other form of ID.’⁵⁰ Not a single respondent of the 58 to answer this question believed they had the necessary equipment within the council to produce voter ID when we surveyed them.

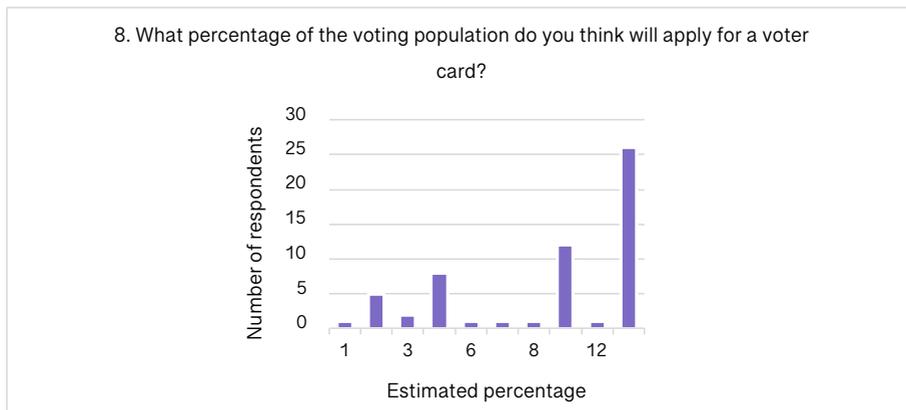
Of course, one of the largest unknown aspects of the introduction of voter ID in 2023 will be the numbers of voters seeking to obtain the new voter card (now more than likely a sheet of A4 paper) to present at the polling station to prove their identity. If we revisit the UK Government’s own data: ‘Ninety-eight per cent [of respondents] held some form of photo ID (including ID that had expired or where the photo was no longer recognisable). Slightly fewer (96%) held a form of photo ID with a photo that respondents thought was recognisable (including ID that had expired), while nine in ten (91%) held a form of photo ID that was both in-date and recognisable.’⁵¹

Thus, reasonable expectations of the demand for voter ID would seem to range between 2% and 9% of the voting. As such, the survey then asked respondents to predict what percentage of local residents they thought would apply for the voter ID to show at polling stations. Their predictions were wide-ranging.

49 Survey Respondent 114092780226, 10 August 2022.

50 Interview with Peter Stanyon on 29 July 2022.

51 UK Cabinet Office, *Photographic ID Research - Headline Findings*.



QUESTION 8: As can be seen from chart 8, most respondents believe that there will be a high take-up for the voter card. Whether this is simply through the novelty, as some people will simply want to know what it is or maybe because they feel they will need this rather than any other form of ID, is difficult to know. But councils are preparing for there to be a high level of work required in the administration and processing of voter ID documents for those people that apply for them. (N.58) The numbers ranged from one council predicting that 1% of the population would apply for the ID to one predicting 75% take up. Whilst for a local election in England the latter might seem a little extreme, the mean average number across the 58 councils in reply to this question was 16%.

QUESTION 9: We asked respondents to estimate the electorate in their council area, bearing in mind these are only those councils with elections next May. The total electorate across the 58 respondents to this question was 6,057,631 – 16% of this is 969,220. Once again, accurately extrapolating this figure across over 200 councils next May would be impossible – but what should be considered is that even if councils have overestimated demand, there will still be considerable work for them to do in administering voter ID. As Peter Stanyon stated in our interview with him; ‘Our concern, as an association, is that every time there is an election, or a general

election, is that there will be that many people, say 15% who apply each time for a voter ID document, because people aren't going to keep the document from one election to the next.⁵²

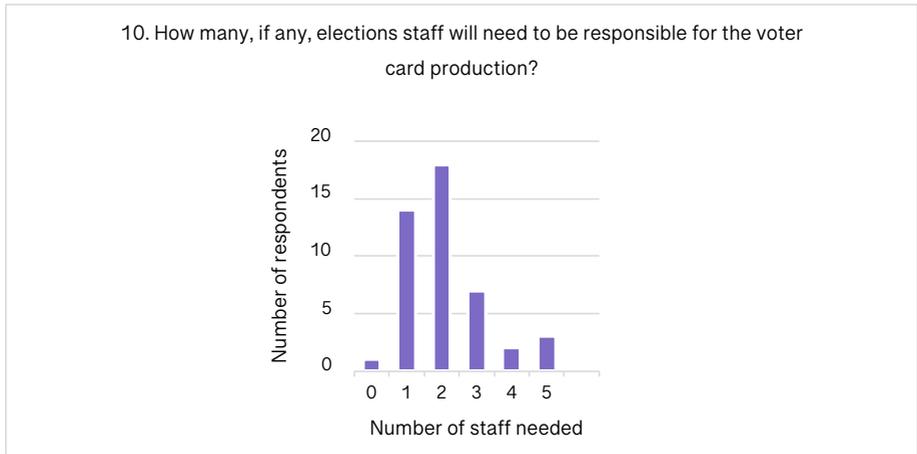
Finally, on the issue of production of the voter card, the survey asked councils how many staff they felt they would need to allocate to the production of the voter cards. As the secondary legislation has only just been tabled, and certainly not been decided upon, councils were unclear what their duties would be in delivering their part of the administration around the production of the voter card. According to the Government itself,

'Provisions are in place to complete these steps and the voter identification statutory instruments are now expected to be made by mid-January 2023. This milestone reflects the need for complex policy and legal drafting, ensuring adequate testing of the digital solutions, and continued engagement and preparation with the electoral sector to ensure they are ready for implementation as they move into the more intense process of preparations for polling day around the start of the year.'⁵³

As a consequence, a number of respondents did not answer this question. Others responded with a numeric range, but for the purposes of data clarity we have chosen to display the lowest estimate in each case.

52 Interview with Peter Stanyon on 29 July 2022.

53 Paul Scully MP to William Wragg MP, Letter (30 August 2022).



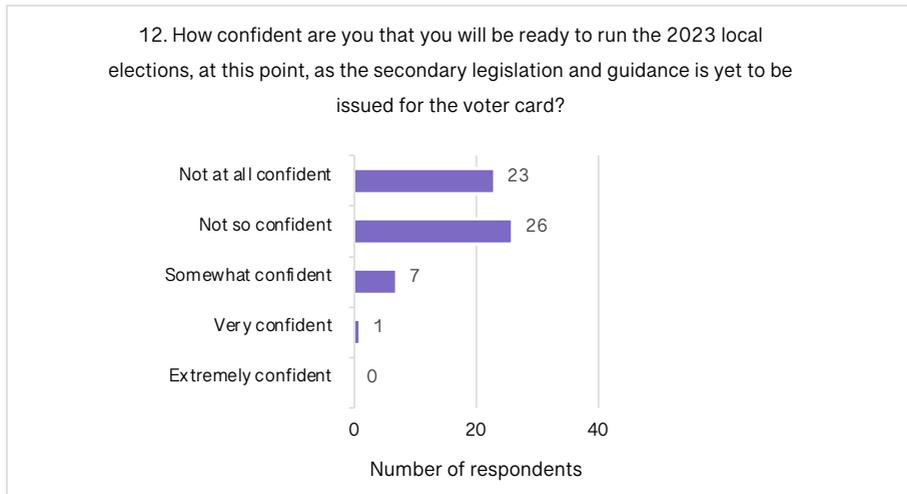
QUESTION 10: As can be seen from chart 10, councils *are* predicting they will need to dedicate staff to administering the collection of information for the production of voter cards. Many elections teams, based on their already small staffing numbers, will struggle to add this new work to their usual elections workload, although there is a reasonable expectation that this work could be done by other departments in councils. (N.45)

The survey then asked respondents to, once again, assess their own levels of confidence in delivering the new aspects of the voting process.



QUESTION 11: Councils are generally not confident about administering the collection of the relevant data for the manufacturing of voter cards, even if this production is done by another third party. As Peter Stanyon commented in interview:

‘The elections community don’t know enough to know what the implications will be from this change due to the lack of communication. It will be delivered but that is different from whether it is deliverable. There is a fear that local authorities will be blamed for a new system that wasn’t properly in place 4 months before the election.’⁵⁴ (N.54)



QUESTION 12: Election administrators were overwhelmingly concerned that they would not be ready to run the elections in 2023 because of the lack of secondary legislation at the time of the survey. The relevant guidance that will follow on from this from the Electoral Commission and the Association of Electoral Administrators, is presumably still in the process of being drafted, but cannot be finalised before the relevant statutory instruments have been agreed. Peter Stanyon suggested that ‘time has run away, and we haven’t seen the secondary legislation and the headline in the Act is that there will be voter ID, what that means, how that works, how that’s rolled out, what the deadlines are, none of that had been shared, means that time to May is now becoming very tight.’⁵⁵ It was also a major concern in the comments section at the end of the survey ranging from the optimistic; ‘I do think that the confidence levels may change once we do receive the secondary legislation and also details of the funding models,’⁵⁶ to:

‘Until the government produces more information and prepares the secondary legislation required, bodies such as the Electoral Commission are unable to prepare suitable guidance, and electoral administrators have no idea of the likely actual impact... Money and resources would be better

55 Interview with Peter Stanyon on 29 July 2022.

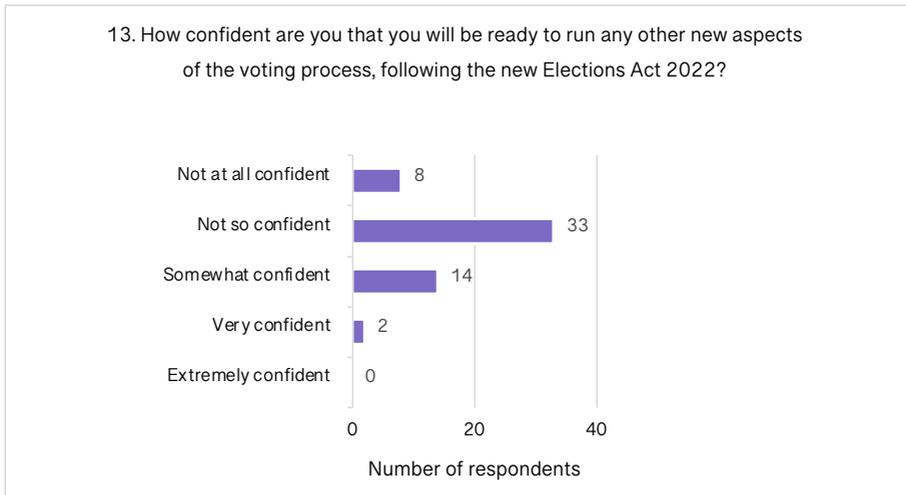
56 Survey Respondent 114092780226, 10 August 2022.

directed elsewhere, and the voter ID requirements are only likely to add to electoral administrative burdens at a key time in the electoral cycle, i.e. immediately prior to elections.⁵⁷

Another responded writing,

‘The delay to secondary legislation and guidance, as well as lack of details on funding allocations, means that at present it is impossible for electoral administrators to adequately prepare for the implementation of the forthcoming change, in particular the introduction of voter ID. Therefore, I am not confident that we will be able to deliver these changes successfully on the current timetable.’⁵⁸

Another stated, ‘we need time to prepare properly so the confidence of the public we have built up in the past years is not shattered. We are expected to prepare for an election when secondary legislation is not in place so how do we prepare? What processes are required to make this successful?’⁵⁹ (N.57)



57 Survey Respondent 114091263004, 9 August 2022.

58 Survey Respondent 114088174197, 4 August 2022.

59 Survey Respondent 114084066605, 29 July 2022.

QUESTION 13: Whilst it seems that other new aspects of the voting process will not be brought in at the same time as voter ID, as administrators were expecting this to occur, the survey asked them about these changes as well. Of these other changes to elections practices, Peter Stanyon said,

‘The amount of change that’s coming from the Elections Act – everyone, even in the electoral community, is concentrating on Voter ID in some ways that’s one of the easiest things being introduced. Things like the postal vote handling changes are complicated, the rules around overseas electors meaning they get votes for life, the changes to postal voting and proxy voting, the accessibility changes coming in, concentrating on blind and visually impaired voters when in fact it’s about any elector coming in. This is an enormous project. And I’ve not even mentioned the changes to the governance of the Electoral Commission and what they will be told to look at by the Government on a rolling basis. The system is creaking and a lot of that comes back to the timescale of the introduction of these changes.’⁶⁰

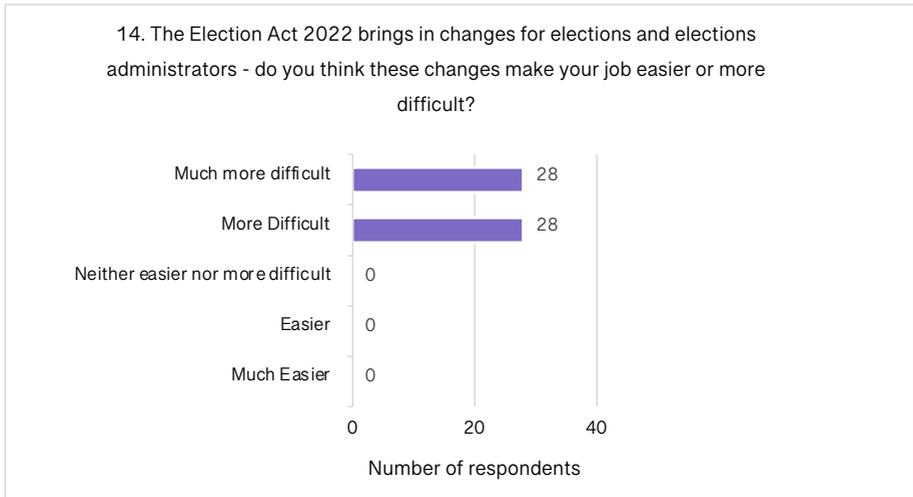
One of the administrators who responded added,

‘my main concern is the capacity of the core team. Voter ID is the headline change to the elections process but the other administrative changes, such as the postal vote handling rules, create a lot of additional work and do not prevent fraud. Polling Station staffing issues may need to be mitigated by reducing the number of polling stations.’⁶¹

Otherwise, this administrator has identified a potentially unintended consequence of the other new processes – there may be fewer polling stations, making it more difficult for those voters who wish to vote in person. (N.57)

60 Interview with Peter Stanyon on 29 July 2022.

61 Survey Respondent 114085472234, 1 August 2022.



QUESTION 14: Finally, the survey asked administrators the following: ‘The Election Act 2022 brings in changes for elections and elections administrators - do you think these changes make your job easier or more difficult?’ Not a single respondent indicated it made their work easier in any way, indeed no respondents even gave the middle response of ‘neither easier nor more difficult’. Administrators were equally split between whether this would simply make their jobs ‘more difficult’ or ‘much more difficult.’ (N.56)

This seems to underline the deep concerns that the professional electoral community has towards the incoming effects of the introduction of the voter ID requirements in 2023.

Financing the 2023 elections

One of the aspects of the election that the survey did not consider, partly through the staff not being responsible for this aspect of the election, but also because this data was not yet available, was how all this extra expense was going to be supported.

Toby James, an academic who is an expert in electoral integrity commented in *Electoral Management in Britain in Advancing Electoral Integrity*, that '[The financial crises beginning in the 1970s to the present day] combined with the rising costs of elections, pose cost pressures and tough choices about which areas to maximise performance in...constitutional devolution to Scotland and Wales has added further legal complexity to the rules for elections.'⁶² He continued, 'staff commonly report that they are faced with high costs [in] running elections and frequently experience difficulty obtaining sufficient money from the Council.'⁶³

Alistair Clark, writing in the same volume commented that:

'Even when additional factors such as electorate density, socio-economic structure, and type of local authority are held constant...it begins to confirm one of the most prevalent but implicit hypotheses in the literature on election administration – that higher levels of spending on elections will lead to higher levels of election quality.'⁶⁴

And this is something that the comments section of the survey drew out of respondents. One respondent stated,

62 Toby James, 'Electoral Management in Britain' in Pippa Norris, Richard W. Frank, and Ferran Martinez i Coma (eds), *Advancing Electoral Integrity* (Oxford University Press, 2014) p.147.

63 James, 'Electoral Management', p.153.

64 Alistair Clark, 'Investing in Electoral Management' in Pippa Norris, Richard W. Frank, and Ferran Martinez i Coma (eds), *Advancing Electoral Integrity* (Oxford University Press, 2014) p.184.

‘we need time to prepare properly so the confidence of the public we have built up in the past years is not shattered. We are expected to prepare for an election when secondary legislation is not in place so how do we prepare? What processes are required to make this successful? Also, will we be reimbursed sufficiently for the additional costs?’⁶⁵

Another identified that there are solutions already available from elections suppliers, arguing,

‘My main concerns on voter ID are drumming into long time [presiding officers] the need to check ID and make sure it is the correct ID and record it properly. I would prefer to use one of the tablets in polling station solutions offered by suppliers but just don’t have the money to do this.’⁶⁶

One simply adding, ‘there will not be sufficient resources available to support implementation of these additional measures.’⁶⁷ This suggests that human as well as financial resources will be stretched, or worse, with the requirements for voter ID. Another commented,

‘The delay to secondary legislation and guidance, as well as lack of details on funding allocations, means that at present it is impossible for electoral administrators to adequately prepare for the implementation of the forthcoming change, in particular the introduction of Voter ID. Therefore, I am not confident that we will be able to deliver these changes successfully on the current timetable.’⁶⁸

A final respondent suggests that ‘the government hasn’t given any indication of the level of funding each local authority can expect to receive to help deal with this new burden. Without both the secondary legislation and expected funding, planning for this is virtually impossible.’⁶⁹

65 Survey Respondent 114084066605, 29 July 2022.

66 Survey Respondent 114092520014, 10 August 2022.

67 Survey Respondent 114091304900, 9 August 2022.

68 Survey Respondent 114088174197, 4 August 2022.

69 Survey Respondent 114083393872, 28 July 2022.

Democracy Volunteers, the organisation I work for as their Director, conducted a series of Freedom of Information requests in 2021 concerning local council electoral services departments, including their staffing and their funding. This was because our organisation had become aware that ‘councils, partly due to the ongoing budgetary challenges faced by many local authorities, have seen some reductions in the numbers of staff working in elections and, especially in a period when elections have become even more challenging than usual, this might prove to be difficult to organise and conduct effective elections.’⁷⁰

Based on a sample of 196 councils responding, across England, Democracy Volunteers ‘discovered that over the past 5 years there has been a 5.5% reduction in the number of staff working in elections and a 40% below inflation rise in funding for elections.’⁷¹

Peter Stanyon highlighted just this problem in interview:

‘Voter ID will help polling clerks to identify voters, as opposed to just asking for their name and address. It works well in Northern Ireland. It costs – and the Electoral Commission have said the same, when it comes down to it there should be a voter ID card [as opposed to a piece of paper] and whether that’s practical or not, and there are lots of other forms of ID out there, but it does smack of “we don’t want to spend the money to bring in a fool proof fraud system.”’⁷²

One respondent put this point even more bluntly, ‘will we be reimbursed sufficiently for the additional costs?’⁷³

What does seem clear is that election administrators are concerned about the deliverability of the elections and voter ID in particular. To reiterate Peter Stanyon from earlier in this report:

70 ‘Democracy Under Stress’, *Democracy Volunteers Blog* (27 August 2021), <https://democracyvolunteers.org/democracy-under-stress-a-report-into-elections-funding-in-england/>, accessed 4 November 2022.

71 Ibid.

72 Interview with Peter Stanyon on 29 July 2022.

73 Survey Respondent 114084066605, 29 July 2022.

‘The elections community don’t know enough to know what the implications will be from this change due to the lack of communication. It will be delivered but that is different from whether it is deliverable. There is a fear that local authorities will be blamed for a new system that wasn’t properly in place 4 months before the election.’⁷⁴

Both the implementation of voter ID, as well as the staff required to deal with this new aspect of the electoral process, combined with the lack of clarity of the financing of the extra work, staffing and document production leave election administrators unclear, and this is putting it mildly, about how to deliver the English local elections in 2023.

74 Interview with Peter Stanyon on 29 July 2022.

Conclusion

The introduction of ID to vote in polling stations in England for the 2023 local elections does not appear to have been greeted with unalloyed enthusiasm by electoral administrators. There appear to be three factors that have led to this concern from practitioners: timing, finance and, perhaps most importantly, the concern that it will unduly exclude some who should have the right to vote from voting.

The timing of secondary legislation, namely the practical details that explain the actual processes by which the primary legislation will be implemented, is clearly a concern to the electoral practitioner community. All of those responding to our survey stated that its introduction made their job either 'more difficult' or 'much more difficult'. This cannot be reassuring for those legislating for these changes. As time slips towards the May elections, which are effectively March to May local elections, the window for these changes to be implemented, understood, and communicated to a wider public audience is narrowing rapidly. However, despite this, the arguments themselves in favour of ID to vote are not undermined by the timing of the introduction of this secondary legislation. After all, England is the only part of Great Britain with elections planned for May 2023. Scotland and Wales are not subject to this legislation for their local council elections and so this large-scale pilot would not be helped, or hindered, by other elections. Indeed, as this is one of the smaller rounds of elections seen in the UK, it may be a reasonable test bed for voter ID more widely ahead of a presumed UK general election in 2024/25. An election where all Great Britain will be subject to the voter ID requirements.

Finance is perhaps an area where legislators face a larger than expected economic burden because of the changes in the Elections Act 2022. It will see the need for new training programmes for presiding officers and polling clerks as all of those conducting the polls will need to undergo highly detailed training to identify the forms of acceptable ID that can be presented at a polling station. More staff in polling stations will almost certainly be required if for no other reason than for the potentially lengthy queues that

might form with the added layer of checking that will need to be undertaken as voters arrive. Councils may also need to employ, or second, other internal staffing resources to handle the numbers of new applications for ID that they are predicting. Elections will cost more as a consequence of these changes. That may be seen as a positive by practitioners but unless the funding received to cover these extra costs is the full equivalent, we may see other aspects of elections become less robust. This report has not even begun to discuss the potential changes to polling station design that might be required for some voters who wear face coverings to have their ID checked in private by someone of the same gender.

Whilst the electoral community is aware of these changes, the wider public may not yet be conscious of the implications for their voting experience. A largescale public awareness campaign will be essential before May 2023 to ensure that voters are not summarily turned away at polling stations because they are unaware that they need ID to vote in person. One can imagine that some voters who are used to voting in person, who may even be known to the staff in the polling station, will find themselves being turned away from voting. One can easily imagine that many of those turned away will not return before the 10pm deadline to vote.

Above all the greatest concern is that voters who have every right to vote may, through no fault of their own, be excluded from voting.

Of course, ID will only be required to vote in person at a polling station. It will not be required to vote by another method – the main alternative being by post. The objective of the introduction of voter ID to vote in person is intended to reduce the potential for, and practice of, personation as well as electoral fraud in polling stations. It does nothing whatsoever to reduce fraud when casting a postal vote. Intimidation, collusion, and covert breaches of the secret ballot will still be simple in the confines of the home. As a consequence of the introduction of ID to vote in 2023, it will be interesting, and potentially indicative, to see if the number of those applying for postal votes increases and the demand for ID reduces as voters decide to use the postal method instead.

So, will voter ID requirements to vote in person be delivered in the 2023 English local elections?

Whilst it appears to be the UK Government's intention to press ahead with the plans to introduce these for the May 2023 local elections, the timetable appears to be slipping. According to the Minister responsible,

'The Government's intention has always [...] been to implement the changes arising from the Act in stages, ensuring the continued successful delivery of elections alongside the implementation of new measures. The decision to continue with the implementation of voter identification for the May 2023 polls responds to this, allowing the sector to turn their focus to further changes due to be implemented later in 2023 and ahead of elections scheduled for 2024,⁷⁵

This timetable appears to mean that the plan is now to have ID requirements in place as part of a staged introduction over the coming few years, with gradual steps to introduce this policy from May 4th 2023 for example.⁷⁶ The minister also stated that, 'these [changes] will need to be implemented alongside business-as-usual activities and, given the "no-fail" nature of this vital service, careful planning and consideration is necessary.'⁷⁷

The introduction of all aspects of the Elections Act 2022 will not be introduced for the May 2023 local elections. Voter identification will now be enacted in January 2023 – the new deadline for the introduction of voter ID will be 28th February 2023, with 4th May being the first day the policy will go live. This timescale would then require local authorities to prepare in a shorter period the preparation and training that they had hoped to complete ahead of 4th May 2023. Paul Scully confirms that original plans were that voter identification statutory instruments would be finalised by mid-January, this could be later based on the start date of 28th February, nonetheless he stated:

75 Paul Scully MP to William Wragg MP, Letter (30 August 2022).

76 Draft Statutory Instrument on the introduction of Voter ID 2022.

77 Paul Scully MP to William Wragg MP, Letter (30 August 2022).

‘This milestone reflects the need for complex policy and legal drafting, ensuring adequate testing of the digital solutions, and continued engagement and preparation with the electoral sector to ensure they are ready for implementation as they move into the more intense process of preparations for polling day around the start of the year.’⁷⁸

May 2023 will be an important milestone in UK electoral development and integrity. It will not only be a test of the new requirements to show ID to vote, but also of those tasked with administering elections.

If voter ID is not introduced and effectively tested in May 2023, it would seem courageous to pilot this new policy at a likely 2024/25 UK-wide Westminster general election, when other parts of Great Britain will have had no experience of implementing it. This would be at a time when levels of take up of the voter ID document will be at best uncertain, and presumably at their most demanded. In addition, two significant jurisdictions, Scotland and Wales, as well as hundreds of English councils will have had no experience of the new policy. Nor is there political support for it among the Scottish and Welsh governments.

I was reminded whilst considering a title for this paper of the child counting to twenty when playing hide-and-seek as children, the clock is counting down and voter ID is coming in 2023 ‘ready-or-not!’

78 Paul Scully MP to William Wragg MP, Letter (30 August 2022).

Appendix A – List of councils with local elections in England 2023

Metropolitan Boroughs (Whole Council):

Bolton, Liverpool, Oldham, Stockport, Tameside, Wigan, Wolverhampton.

Metropolitan Boroughs (Third of Council):

Barnsley, Bradford, Bury, Calderdale, Coventry, Dudley, Gateshead, Kirklees, Knowsley, Leeds, Manchester, Newcastle upon Tyne, North Tyneside, Rochdale, Salford, Sandwell, Sefton, Sheffield, Solihull, South Tyneside, Sunderland, Trafford, Wakefield, Walsall, Wirral.

Unitary Authorities (Whole Council):

Bath and North East Somerset, Bedford, Blackpool, Bracknell Forest, Brighton and Hove, Bournemouth, Christchurch and Poole, Central Bedfordshire, Cheshire East, Cheshire West and Chester, Darlington, Derby, East Riding of Yorkshire, Herefordshire, Leicester, Luton, Medway, Middlesbrough, North Lincolnshire, North Somerset, Nottingham, Redcar and Cleveland, Rutland, Slough, Southampton, South Gloucestershire, Stockton-on-Tees, Stoke-on-Trent, Telford and Wrekin, Torbay, West Berkshire, Windsor & Maidenhead, York.

Unitary Authorities (Third of Council):

Blackburn with Darwen, Halton, Hartlepool, Hull, Milton Keynes, North East Lincolnshire, Peterborough, Plymouth, Portsmouth, Reading, Southend-on-Sea, Swindon, Thurrock, Wokingham.

District Councils (Whole Council):

Amber Valley, Arun, Ashfield, Ashford, Babergh, Bassetlaw, Blaby, Bolsover, Boston, Braintree, Breckland, Broadland, Bromsgrove, Broxtowe, Canterbury, Charnwood, Chelmsford, Chesterfield, Chichester, Cotswold, Dacorum, Derbyshire Dales, Dover, Lewes and Eastbourne, East Cambridgeshire, East Devon, East Hampshire, East Hertfordshire, East Lindsey, East Staffordshire, East Suffolk, Epsom and Ewell, Erewash, Fenland, Folkestone & Hythe, Forest of Dean, Fylde, Gedling, Gravesham, Great Yarmouth, Guildford, Harborough, Hertsmere, High Peak, Hinckley and Bosworth, Horsham, King's Lynn and West Norfolk, Lancaster, Lewes and Eastbourne, Lichfield, Maldon, Malvern Hills, Mansfield, Melton, Mid Devon, Mid Sussex, New Forest, Newark and Sherwood, North Devon, North East Derbyshire, North Kesteven, North Norfolk, North Warwickshire, North West Leicestershire, Oadby and Wigston, Ribble Valley, Rother, Runnymede, Rushcliffe, Sevenoaks, South Derbyshire, South Hams, South Holland, South Kesteven, South Norfolk, South Oxfordshire, South Ribble, South Staffordshire, Spelthorne, Stafford, Staffordshire Moorlands, Stratford-on-Avon, Surrey Heath, Swale, Teignbridge, Tendring, Test Valley, Tewkesbury, Thanet, Tonbridge and Malling, Torridge, Uttlesford, Vale of White Horse, Warwick, Waverley, West Devon, West Lancashire, West Lindsey, West Suffolk, Wychavon, Wyre, Wyre Forest.

District Councils (Third of Council):

Basildon, Basingstoke and Deane, Brentwood, Broxbourne, Burnley, Cambridge, Cannock Chase, Castle Point, Cherwell, Chorley, Colchester, Crawley, Eastleigh, Elmbridge, Epping Forest, Exeter, Harlow, Hart, Havant, Hyndburn, Ipswich, Lincoln, Maidstone, Mole Valley, North Hertfordshire, Norwich, Pendle, Preston, Redditch, Reigate and Banstead, Rochford, Rossendale, Rugby, Runnymede, Rushmoor, Stevenage, Tamworth, Tandridge, Three Rivers, Watford, Welwyn Hatfield, West Oxfordshire, Winchester, Woking, Worcester, Worthing.

Appendix B – Survey questions

2023 Voter ID Introduction Survey of Election Administrators

Organisational Information

All information is confidential, but please note you must fill out the contact details section at the beginning of this form if you wish to receive the report.

1. Please provide us with your contact details

- Name
- Address
- Address 2
- City/Town
- County
- Postal Code
- Email Address
- Phone Number

2. Please tell us your job title within the elections division of your council.

3. What is the name of your council? (eg Coventry City Council)

Your Council and Your Team

Understanding the context you will be running elections in, in 2023, could have a significant effect on councils and their capacity to introduce a system of voter ID card.

4. What best describes your council area and elections in 2023? (You may also have a mayoral election on the same day, we are specifically asking about the council).

- A Metropolitan Borough (all up elections)
- A Metropolitan Borough (third up elections)
- A Unitary Council (all up elections)
- A Unitary Council (third up elections)
- A Non-metropolitan District (all up elections)
- A Non-metropolitan District (third up elections)

5. How many members of staff work ‘exclusively’ on elections? (If you don’t know the exact number please estimate this number)

6. How many extra staff can you draw upon during the election period to assist the core team with the running of the election, excluding polling day? (If you don’t know the exact number please estimate this number)

7. How many presiding officers, polling clerks and other polling station staff do you employ on polling day? (If you don't know the exact number please estimate this number)

- Presiding Officers
- Polling Clerks
- Other polling station staff

Training Your Staff for Polling Day

The election in 2023 could see a need for councils to train polling staff on the required forms of ID and how to check them, their validity and their owner's identity.

8. How confident are you that you can train your polling day staff to check ID and to ensure those with a right to vote are able to vote?

- Extremely confident
- Very confident
- Somewhat confident
- Not so confident
- Not at all confident
- Prefer Not to Say

9. How confident are you that all voters with suitable ID will be able to vote?

- Extremely confident
- Very confident
- Somewhat confident
- Not so confident
- Not at all confident

10. Are you worried that delivering this part of the new election procedure will lead to problems in polling stations?

- Extremely Worried
- Very Worried
- Somewhat Worried
- Not so worried
- Not at all worried

Voter Cards

As part of the introduction of mandatory ID to vote, in person, in Great Britain councils will be required to issue those who require one with a unique card which allows them to vote in person.

11. Do you feel the council has the necessary equipment to issue voter cards at the moment?

- Yes
- No

Other (please specify)

12. What percentage of the voting population do you think will apply for a voter card?

0 100

13. What is the approximate electorate in your council area?

14. How many, if any, elections staff will need to be responsible for the voter card production?

15. How confident are you that you will be able to manage the process of voter card production, at the scale you are expecting?

- Extremely confident
- Very confident
- Somewhat confident
- Not so confident
- Not at all confident

16. How confident are you that you will be ready to run the 2023 local elections, at this point, as the secondary legislation and guidance is yet to be issued for the voter card?

- Extremely Confident
- Very Confident
- Confident
- Not so Confident
- Not Confident

17. How confident are you that you will be ready to run any other new aspects of the voting process, following the new Elections Act 2022?

- Extremely confident
- Very confident
- Somewhat confident
- Not so confident
- Not at all confident

Final Thoughts

18. The Election Act 2022 brings in changes for elections and elections administrators - do you think these changes make your job easier or more difficult?

- Much easier
- Easier

- Neither easier nor more difficult
- More difficult
- Much more difficult

19. Is there anything else you would like to tell us before completing the survey?

20. The Constitution Society will hold a briefing based on this paper, following publication, would you like to receive details of this event?

Appendix C – Acceptable forms of ID to vote in person⁷⁹

A UK, Commonwealth or EEA passport

A UK (DVLA or DVA Northern Ireland), Channel Islands, Isle of Man or an EEA driving licence

A biometric immigration document issued in accordance with regulations under section 5 of the UK Borders Act 2007

A PASS card issued by the National Proof of Age Standards Scheme bearing the PASS hologram

An MOD Defence Identity Card

A concessionary photo travel pass from Oyster 60+, a Freedom Pass, or a concessionary travel pass from a scheme funded by the Government of the United Kingdom, the Scottish Government or the Welsh Government

Northern Ireland Concessionary Fares Scheme cards:

- o Senior SmartPass
- o Registered Blind SmartPass or Blind Person's 35 SmartPass
- o War Disablement SmartPass or War Disabled SmartPass
- o A 60+ SmartPass
- o A Half Fare SmartPass

⁷⁹ House of Commons Library, <https://researchbriefings.files.parliament.uk/documents/CBP-9187/CBP-9187.pdf>.

A Blue Badge scheme card issued in Great Britain or Northern Ireland

A free voter card issued by a person's local electoral registration officer (the new photographic voter ID card to be introduced by the Act)

An existing Northern Ireland voter ID card

A national identity card issued by an EEA state

Bibliography

Legislation

Ballot Act 1872

Draft Statutory Instrument on the introduction of Voter ID 2022

Elections Act 2022

Electoral Fraud (Northern Ireland) Act 2002

Interviews

Stanyon, Peter, Chief Executive of the Association of Electoral Administrators, 29 July 2022

Official sources

Cabinet Office, *Evaluation of Voter ID Pilots 2019* (2019), <https://www.gov.uk/government/publications/evaluation-of-voter-id-pilots-2019>, accessed 15 October 2022

The Electoral Commission, '2021 election fraud data' (11 May 2021), <https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/our-views-and-research/our-research/electoral-fraud-data/2021-electoral-fraud-data>, accessed 16 October 2022

Electoral Office for Northern Ireland Website, <https://www.eoni.org.uk/Electoral-Identity-Card/How-to-apply>, accessed 15 October 2022

House of Commons Library, *Voter ID Research Briefing* (26 October 2022) <https://commonslibrary.parliament.uk/research-briefings/cbp-9187/>, accessed 2 November 2022

House of Commons Library, *Voter ID* (14 November 2022) <https://researchbriefings.files.parliament.uk/documents/CBP-9187/CBP-9187.pdf>, accessed 16 November 2022

House of Commons Northern Ireland Select Committee 2004, <https://publications.parliament.uk/pa/cm200405/cmselect/cmniaf/131/13106.htm#a19>, accessed 15 October 2022

Office for National Statistics, *Electoral registrations for Parliamentary and local government elections as recorded in the electoral registers for England, Wales, Scotland and Northern Ireland* (December 2021), <https://www.ons.gov.uk/peoplepopulationandcommunity/elections/electoralregistration/datasets/electoralstatisticsforuk>, accessed 24 October 2022

OSCE/ODIHR, United Kingdom, Early General Election, 12 December 2019: *Needs Assessment Mission Report* (2019), <https://www.osce.org/odihr/elections/uk/440537>, accessed 16 October 2022

Office for Democratic Institutions and Human Rights, *UK General Election 5 May 2005 OSCE/ODIHR Needs Assessment Mission Report* (2005) <https://www.osce.org/odihr/elections/uk/115662>, accessed 23 October 2022

Pickles, Eric, 'Securing the ballot', *Report of Sir Eric Pickles' review into electoral fraud* (2016) <https://www.gov.uk/government/publications/securing-the-ballot-review-into-electoral-fraud>, accessed 15 October 2022

The National Archives, *Draft Statutory Instrument on The Voter Identification Regulations 2022*, <https://www.legislation.gov.uk/ukdsi/2022/9780348240504>, accessed 15 October 2022

The Six Points, <https://www.chartistancestors.co.uk/six-points/>, accessed 16 October 2022

UK Cabinet Office, *Photographic ID Research - Headline Findings*, 31 March 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/984918/Photographic_ID_research-_headline_findings_report.pdf, accessed 15 October 2022

Correspondence

Association of Electoral Administrators, Letter from Peter Stanyon to Rt Hon Greg Clark MP (Secretary of State) (11 July 2022), <https://www.aea-elections.co.uk/wp-content/uploads/2022/07/Letter-to-Sec-of-State-Elections-Act-2022.pdf>, accessed 16 October 2022

Scully, Paul, MP to Wragg, William, MP, Letter (30 August 2022), https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101910/Minister_Paul_Scully_to_PACAC_on_Elections_Act_implementation.pdf, accessed: 19 October 2022

Literature

Alonso-Curbelo, Ana, 'The Voter ID Debate: An Analysis of Political Elite Framing in UK Parliament' in *Parliamentary Affairs* 00 (2022), pp 1–23

Bertrand, Romain, Briquet, Jean-Louis, & Pels, Peter, *The Hidden History of the Secret Ballot, The Secret Ballot in the Nineteenth century* (Hurst, 2007)

Fieldhouse, Edward, Prosser, Christopher, Bailey, Jack, & Mellon, Jonathan, 'Who Lacks Voter Identification? The Electoral Implications of the UK Elections Bill 2021' (2021), <https://ssrn.com/abstract=3966155>, accessed: 23 October 2022

James, Toby, and Clark, Alistair, 'Electoral integrity, voter fraud and voter ID in polling stations: lessons from English local elections', in *Policy Studies XL* (2019), pp 190-209

Norris, Pippa, Frank, Richard W., and Martinez i Coma, Ferran, (eds), *Advancing Electoral Integrity* (Oxford University Press, 2014)

Other sources

Association of Electoral Administrators, *Policy Positions 2021*, <https://www.aea-elections.co.uk/wp-content/uploads/2022/02/Policy-Positions-2021-Overarching-11-Feb-22.pdf>, accessed: 4 November 2022.

Bertrand, Natasha, and Samuelsohn, Darren, 'What if Trump won't accept 2020 defeat?', *Politico* (21 June 2019), <https://www.politico.com/story/2019/06/21/trump-election-2020-1374589>, accessed: 16 October 2022.

'Democracy Under Stress', *Democracy Volunteers Blog* (27 August 2021), <https://democracyvolunteers.org/democracy-under-stress-a-report-into-elections-funding-in-england/>, accessed: 4 November 2022.

Garland, Jessica, 'Expensive Voter ID scheme is neither necessary nor proportionate', *Electoral Reform Society Blog* (22 October 2021), <https://www.electoral-reform.org.uk/expensive-voter-id-scheme-is-neither-necessary-nor-proportionate/>, accessed: 15 October 2022.

Kenyon, Megan, 'Sector isn't ready to implement Elections Act, senior councillors say', *Local Government Chronicle* (24 October 2022), <https://www.lgcplus.com/politics/service-reform/sector-isnt-ready-to-implement-elections-act-senior-councillors-say-24-10-2022/>, accessed: 24 October 2022.

Stanyon, Peter, 'Chief Executive Officer of the AEA', 21 June 2022 <https://www.aea-elections.co.uk/policy-reporting/statements-communications/aea-statement-on-the-elections-bill/>, accessed 23 Oct 2022

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