



Ministry of Housing,
Communities &
Local Government

Electoral Integrity Programme Evaluation: Year 2

IFF Research for MHCLG





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Ministry of Housing, Communities and Local Government
Fry Building

2 Marsham Street

London

SW1P 4DF

Telephone: 030 3444 0000

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Foreword

This report by IFF Research presents the findings from several strands of research and analysis relating to elections and voting at the July 2024 UK Parliamentary General Election, as part of the overarching evaluation of the Electoral Integrity Programme (EIP).

The EIP delivered a set of measures, introduced by the previous UK Government through the Elections Act 2022, to strengthen the integrity of the electoral system and ensure that elections remain secure, fair, modern and transparent.

This report meets commitments made in the last Parliament and specified in voter identification legislation to carry out a thorough evaluation of the implementation of voter identification at the local elections in England in May 2023, and the first two UK Parliamentary General Elections following introduction (evaluation of voter identification at the next UK Parliamentary General Election will follow in due course). It expands on the [2023 Report](#), providing further evaluation of voter identification and accessibility requirements, as well as evaluating other EIP measures introduced since the May 2023 polls. This report aims to improve our understanding of the impact of the EIP measures, to improve future delivery and inform policy decisions.

The report draws together numerous research strands using a theory-based approach to assess the implementation and impact of the EIP. This includes [Ipsos' Public Opinion Research](#) (published in February 2025), qualitative research with citizens, electoral services teams, polling station staff, and police officers carried out by IFF Research, and analysis of monitoring and cost data from across the programme.

I would like to thank colleagues from IFF Research for their continued hard work conducting this research. Especial thanks should go to the authors: Christabel Downing, Tom Bradley, Maya Agur, Sashka Dimova, Millie Morgan, Joe Lucas, Elizabeth Bromley and Alix Moussy.

Special thanks are also due to all those in the Ministry of Housing, Communities and Local Government who helped guide, inform and support this research, in particular the Elections Research and Analysis team.

Above all, my sincerest thanks go to the citizens, electoral services teams, police officers, and other experts across the UK who gave their time to take part in the research or supported its delivery. Without their input the evaluation would not have been possible.

Stephen Aldridge
Director for Analysis and Data and Chief Economist
Ministry of Housing, Communities and Local Government

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Glossary

Association of Electoral Administrators (AEA)	UK organisation representing electoral administrators and providing help and advice for UK professionals involved in electoral administration.
Electoral Commission (EC)	The independent body which oversees elections and regulates political finance in the UK.
Electoral Registration Officer Portal (ERO Portal)	Software used by electoral administrators to process Voter Authority Certificates, absent voting applications and overseas elector registration applications. This is sometimes known as the EROP.
Identification (ID)	Photographic documentation unique to a person, used to prove their identity.
Information Technology (IT)	Use of systems such as computers for storing, retrieving and sending information.
The Ministry of Housing, Communities and Local Government (MHCLG)	The Ministry of Housing, Communities and Local Government is a ministerial department that oversees housing, planning, communities and local government policies in the UK.
Online Absent Voting Application (OAVA)	An online service available for electors to apply for a postal or some forms of proxy vote.
Police (Fire) and Crime Commissioner (PCC) elections	Elections held every four years in England and Wales to elect Police and Crime Commissioners. Some PCCs have responsibility for Fire Services also.
Postal Vote Handling and Secrecy (PVHS)	Requirements introduced in 2003 around postal vote handling and secrecy to maintain and strengthen the integrity and security of absent voting in the election system. This included a ban on campaigners handling postal votes of some others, a limit of handing in five postal votes at a polling station or elections office, and a requirement to fill in a form with every postal vote handed in at a polling station or elections office.
Postal And Proxy Voting Revisions (PPVR)	The Elections Act 2022 made changes to the application process for absent voters. This included the requirement to provide a National Insurance number, the requirement to reapply for a postal vote after three years, and the limit on the number of electors for whom a person can act as a proxy for.

Reserved election	These are elections where the responsibility for making the rules sits with the UK Parliament. These include UK Parliamentary elections and recall petitions, local elections in England, Police and Crime Commissioner elections in England and Wales.
Single Point of Contact (SPOC)	Elections SPOCs exist within each of the 43 police force areas in England and Wales, with responsibility during elections for liaising with the Electoral Commission, handling intelligence analysis and dissemination, and supporting with complaints relating to elections offences.
Tactile voting device (TVD)	A device to enable a voter with sight loss to mark a ballot paper independently.
Valuation Joint Boards (VJB)	In Scotland, a valuation joint board is a public body that is responsible for property valuations for local tax purposes and electoral registration across multiple council areas.
Voter Authority Certificate (VAC)	Photographic identification document that can be used to vote in polling stations, available to all electors free of charge from local authorities.

Executive summary

Policy background

The Elections Act 2022 contained measures designed to strengthen the integrity of the electoral system and ensure that elections remain secure, fair, modern and transparent. These measures were delivered through the Electoral Integrity Programme (EIP) as part of the previous UK Government's electoral reform agenda. This evaluation assesses the implementation and impact of the following EIP measures at the July 2024 UK Parliamentary General Election:

- **Voter identification:** the requirement to show an accepted form of photographic identification to vote in person at polling stations;
- **Accessibility:** broadening the requirement for Returning Officers to provide support for people with a wide range of disabilities to vote in the polling station and removing restrictions on who can act as a companion to assist disabled voters;
- **Absent voting:** changes relating to the duration of postal voting arrangements, the handling and secrecy of postal votes, identity checking processes and a new online service for absent vote applications;
- **Overseas electors:** changes to allow all British citizens living abroad who have been previously registered or resident in the UK the right to vote in UK Parliamentary Elections, and extending the registration period for British citizens living abroad;
- **Digital imprints:** a requirement for promoters of certain types of digital campaigning material in scope of the rules to explicitly state who they are, and on whose behalf, they are promoting the material.

Evaluation approach

The Ministry of Housing, Communities and Local Government (MHCLG) commissioned IFF Research to evaluate both process and impact components of the EIP.

The evaluation adopted a theory-based approach using theory of change models to set out how measures might affect change in the short, medium and long term. IFF Research developed a series of contribution claims to articulate how each measure within the theory of change models could lead to change, while recognising the importance of other influencing factors. The extent to which claims had been met was then assessed through synthesis of evidence across a broad range of data sources. This included MHCLG's implementation survey and monitoring data, Ipsos' public opinion surveys (commissioned by MHCLG), the Electoral Commission's Polling Staff Survey and qualitative research

conducted by IFF Research. Each chapter in this report sets out the findings in relation to each of the five electoral measures, and the contribution claims for each.

The evaluation sought to provide timely evidence of the impacts of the measures and was therefore not able to gather some evidence that will take longer to emerge. As such, not all claims could be assessed conclusively in the evaluation timeframe, and the report highlights where further investigation would be needed in future to reach a more definitive view.

This report follows [a year 1 evaluation report](#), which explored the implementation and impact of voter identification and accessibility measures for the May 2023 local elections in England.

Overall findings

Overall, the July 2024 General Election was well-run and the EIP measures were implemented effectively. Evidence showed that, across all measures evaluated, the responsible parties met the requirements of the law for this election. For voter identification, accessibility, absent voting and overseas elector measures, local authorities and polling station staff were well trained and prepared for polling day, and electoral administrators were confident that their delivery met the requirements. For digital imprints, evidence suggested that the police and the Electoral Commission fulfilled their responsibilities as enforcing bodies.

Electors' awareness varied across measures. Although there were high levels of awareness amongst most electors of the need to present photographic identification on polling day, awareness of the other EIP measures was relatively poor. This was also the case among elector groups for whom the measures were most relevant. For example, there was low awareness of Voter Authority Certificates (VACs) among electors without accepted photographic identification, low awareness of the new accessibility measures among disabled electors, and low awareness of changes to absent voting among postal and proxy voters (although the high proportion of electors applying for their absent votes online may indicate electors were simply unaware of the change, rather than unaware of the service itself).

Electoral services teams identified several areas where administrative processes could be made more efficient. Usually, these related to the challenges they had faced with applications for VACs, for absent voting and from overseas electors. Challenges largely related to errors and/or misunderstandings among electors when applying, which required time-consuming communications and liaison from staff to rectify. Sometimes this was compounded by limitations of the Electoral Registration Officer Portal (ERO Portal)'s functionality.

The nature of the changes and evidence available meant it was not possible to reach conclusive verdicts on whether some of the intended impacts had been (fully) achieved. In some instances, this was because of the low incidence of electors who were directly affected by the measures – this made it difficult to capture their views adequately (for example, disabled electors who voted in person, electors who wanted to have their identification document checked in private, and proxy voters).

Additionally, for evidence relating to campaigners (awareness of changes to postal vote handling limits and the new requirement for digital imprints on campaign materials), evidence was weak, as campaigner perspectives were not captured within this evaluation.

It was also difficult to draw confident conclusions on the extent to which the new measures impacted the security and integrity of, and trust in, voting processes. This was partly due to the limited evidence available. It was also the case that participants' views in relation to 'security, integrity and trust' varied.

Some electors, polling station staff and electoral administrators questioned the extent of the problems the new voter identification measures sought to address. This was particularly for personation; someone pretending to be someone else so they can use that person's vote. Here, some participants perceived that the scale of the issue did not warrant the introduction of new measures.

More broadly, electors felt the new measures (across all policy areas) would neither positively nor negatively affect the integrity and security of elections, but did feel that these measures would increase their trust.

Overarching recommendations

Overall, the July 2024 General Election was well-run and, crucially, responsible parties met their requirements of the law across the measures evaluated. Despite increased workloads being an expected outcome of the new requirements, as reflected by the allocation of New Burdens funding, workloads were a recurrent theme raised by electoral services teams. As such, the evaluation has produced recommendations for future delivery aimed at improving workload pressures and efficiency for electoral services teams and polling station staff. This includes exploring the feasibility of improving interaction between the various Electoral Management Systems and the ERO Portal, along with improved functionality within the ERO Portal. Some such changes have already been implemented since the July 2024 UK Parliamentary General Elections.

Another recommendation to help with future delivery is for the Electoral Commission to continue to collect and share examples of good practice across the implementation of all measures, reflecting on learnings. This would add to sources of support and guidance for electoral services teams and polling station staff.




To address gaps in elector awareness, future communications could better highlight accepted identification documents, emphasise options for those without valid photographic identification, promote VACs distinctly, engage more with individuals who are likely to need a VAC, and highlight provisions for private identification checks. National communications could be used to raise awareness of accessibility measures, and local authorities could further work with disability-related community groups to raise this awareness too. For postal voting, clear communication around the time electors can expect to wait before receiving their postal vote could be beneficial. Finally, exploration of reasons for confusion relating to constituency application rules for overseas elector registration is also recommended.

To address current gaps in evidence, further research could continue to monitor data on personation (noting, however, that numbers are very low and it is not possible to attribute any changes to the introduction of voter identification), gather data from campaigners on relevant measures, and evaluate the extent to which digital imprints allow the Electoral Commission to better enforce spending rules.

Summary of key findings across all measures

The subsequent tables outline the findings for each of the EIP measures. They present the contribution claims, and the conclusions reached against each one.

Table 1 Overview of voter identification contribution claims and conclusions

Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 1: Local authority staff meet their requirements by law		Claim met	There is sufficient evidence to demonstrate that local authority staff were well prepared for polling day and implemented their requirements in line with the law.
Claim 2: Polling station staff meet their requirements by law		Claim met	There is sufficient evidence to demonstrate that polling station staff were well prepared for polling day and implemented their requirements in line with the law.
Claim 3: Communication campaigns raise electors' awareness of voter identification		Claim partially met	Evidence indicates high awareness amongst electors of the need to present ID, but confusion persists surrounding which types of ID are accepted.






Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 4: Communication campaigns raise electors' awareness of Voter Authority Certificates		Claim not met	Despite communication efforts, awareness and understanding of VACs remains low among electors, including those without ID.
Claim 5: Electors, who want a VAC and are eligible, are able to obtain one		Claim partially met	Evidence suggests that most electors who wanted a VAC obtained one, but there is still evidence of barriers to uptake amongst some groups.
Claim 6: Electors who want to have their identification document checked in private are able to do so		Claim partially met	Evidence shows most polling stations, but not all, had the appropriate provisions for private ID checks. However, there is not enough evidence to determine whether electors who wanted a private ID check had one.
Claim 7: Personation is identified more easily and reduces in the longer-term		Inconclusive	While ID checks were carried out successfully and feedback indicates that voter ID should make personation more difficult, there is currently limited evidence of the impact of voter ID on personation. Note that this is due to the challenge of proving personation, the low number of cases, and difficulties with attribution.
Claim 8: Electors remain satisfied with the process and ease of in-person voting		Claim partially met	Voter identification had little impact on the experience of voting in person for most electors. There were mixed views on its impact on electors' confidence in the security and integrity of elections, but electors broadly felt it increases their trust.

Table 2 Overview of accessibility contribution claims and conclusions











Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 1: Local authority staff meet their requirements by law		Claim met	There is sufficient evidence to demonstrate that local authority staff were well prepared for polling day and implemented their requirements in line with the law.
Claim 2: Polling station staff meet their requirements by law		Claim met	There is sufficient evidence to demonstrate that polling station staff were well prepared for polling day and implemented their requirements in line with the law.
Claim 3: Communications effectively raise awareness of reform amongst electors with a disability and their carers		Claim not met	There is consistent evidence, across a variety of sources, that confirms awareness among disabled electors of the new measures was relatively low.
Claim 4: Disabled electors are enabled to vote in person as a result of the new measures		Claim partially met	There is evidence to suggest that disabled electors are able to vote in person and find it relatively easy. However, there is limited evidence to confirm this was due to the new measures.

Table 3 Overview of postal voting contribution claims and conclusions

Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 1: Local authorities meet the requirements of the law		Claim met	There is sufficient evidence to demonstrate that local authority staff were well prepared for polling day and implemented their requirements in line with the law.
Claim 2: Polling station staff meet the requirements of the law		Claim met	There is sufficient evidence to demonstrate that polling station staff were well prepared for polling day and implemented their requirements in line with the law.
Claim 3: Targeted communications raise electors' awareness of changes to postal voting		Claim not met	Evidence across multiple sources suggests general awareness of changes to postal voting was low amongst electors, including those who voted by post.
Claim 4: Targeted communications raise campaigners' awareness of changes to postal voting		Inconclusive	There is insufficient evidence that campaigners were aware of changes to postal voting. However, evidence from Electoral Services Managers, Electoral Registration Officers and Returning Officers suggests campaigners were made aware of the changes.
Claim 5: Electors who are eligible and want a postal vote are able to obtain one and continue to maintain their status as a postal voter		Claim met	Evidence across sources suggests few instances of postal vote application rejection.
Claim 6: The application process for absent voting is more modern, accessible and efficient		Claim partially met	Evidence across sources suggests the introduction of the Online Absent Voting Application service made the process easier for electors, but Electoral Management Systems and Electoral Registration Officer Portal limitations created difficulties for local authority staff.



Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 7: Postal votes are more secure		Inconclusive	There is insufficient evidence to determine whether postal votes are more secure.
Claim 8: Electors are confident that postal voting is secure		Claim partially met	There is evidence to suggest that some electors are confident postal voting is secure, but it is difficult to determine the impact of the new measures on this.

Table 4 Overview of proxy voting contribution claims and conclusions













Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 1: Local authorities meet the requirements of the law		Claim met	There is sufficient evidence to demonstrate that local authority staff were well prepared for polling day and implemented their requirements in line with the law.
Claim 2: Targeted communications raise electors' awareness of changes to proxy voting		Claim not met	Evidence across multiple sources suggests low awareness amongst proxy voters about changes to proxy voting.
Claim 3: Electors who are eligible and want a proxy vote are able to appoint an eligible proxy		Claim met	Evidence across sources suggests few instances of proxy vote application rejection.
Claim 4: Proxy votes are more secure		Inconclusive	There is insufficient evidence to determine whether proxy votes are more secure.
Claim 5: The application process for absent voting is more modern, accessible and efficient		Claim partially met	Evidence across sources was inconsistent on whether the process of applying for a proxy vote was easy for electors. Multiple sources suggest it was inefficient for electoral services teams.
Claim 6: Electors are confident that proxy voting is secure		Inconclusive	There is insufficient evidence to determine whether electors feel proxy voting is secure.

Table 5 Overview of overseas elector contribution claims and conclusions

Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 1: Local authority staff meet their requirements by law		Claim met	There is sufficient evidence to demonstrate that local authority staff were well prepared for overseas elector requirements and implemented their requirements in line with the law.
Claim 2: Local authority staff workloads are manageable at peak points around the election cycle		Claim partially met	There is sufficient evidence to demonstrate that most electoral administrators felt the number of applications was manageable. However, there is also evidence, across multiple sources, of concerns around time-consuming registration checks.
Claim 3: Communications effectively raise awareness of reform amongst eligible British citizens living abroad		Inconclusive	As evidence is limited to overseas electors who had applied to vote, this claim cannot be fully assessed. The evidence available points to overseas electors being a hard-to-reach audience.
Claim 4: Overseas electors who want to vote are able to correctly apply in time to vote		Inconclusive	There is insufficient evidence for this claim, as it is not possible to know the proportion of British citizens living abroad who wanted to register to vote and successfully did so.
Claim 5: Newly enfranchised British citizens living abroad register to vote as overseas electors		Claim partially met	There is insufficient evidence for this claim, with indications that some newly enfranchised British citizens living abroad registered to vote as overseas electors.
Claim 6: Overseas electors who want to vote are satisfied with the process of registration		Inconclusive	There is insufficient and mixed evidence for this claim, relying solely on qualitative interviews with overseas electors and electoral services teams.







Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 7: Integrity of overseas elector registration is maintained		Claim partially met	There is insufficient evidence for this claim. Some electors tried to register in the wrong constituency, but the new measures were not seen as a risk to the integrity of elections. There were some mentions of increased trust.

Table 6 Overview of digital imprints contribution claims and conclusions

Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 1: Police and the Electoral Commission fulfil their responsibilities as enforcing bodies under the new requirement consistently.		Claim met	There is sufficient evidence to demonstrate that the police and Electoral Commission staff consistently enforced the digital imprint rules.
Claim 2: Non-compliant materials are found, reported, investigated and sanctioned as appropriate		Claim met	There is sufficient evidence that non-compliant materials were found, reported, investigated and sanctioned as appropriate.
Claim 3: Campaigners are aware of the new requirement and comply with the requirements of the law		Claim partially met	Evidence suggests campaigners were aware of the new requirement, but lacked understanding, leading to a lack of compliance in the first instance.
Claim 4: Digital imprints allow the Electoral Commission to better enforce spending rules		Inconclusive	There is no evidence that supports or denies the claim that digital imprints allow the Electoral Commission to better enforce spending rules.
Claim 5: Public perceptions of transparency and integrity around political campaigning are maintained or improved		Inconclusive	The evidence demonstrates that public perceptions around political campaigning have not been improved, and there is no evidence to support or deny that they have been maintained.

1 Introduction

1.1 Policy background

The Electoral Integrity Programme (EIP) delivered a number of manifesto and other ministerial commitments as part of the previous UK Government's electoral reform agenda. The Programme goals were to strengthen the integrity of the electoral system and ensure that elections remain secure, fair, modern and transparent.

The legal framework for the EIP was set through the Elections Act, which received Royal Assent in April 2022. The provisions in the Elections Act 2022 were implemented through a wide-ranging programme of secondary legislation, with the Government's stated intention that all of the following electoral measures be in force before the end of the previous Parliament:

- The introduction of **voter identification** requirements to show an accepted form of photographic identification at polling stations at UK Parliamentary Elections, Police and Crime Commissioner (PCC) elections in England and Wales, and at local elections and referendums in England. This supported the creation of the Voter Authority Certificate (VAC) - a photographic identification document available to all electors free of charge from local authorities that can be used at the polling station;
- New requirements relating to the **accessibility** of voting at polling stations during local elections in England and Northern Ireland, elections for the Northern Ireland Assembly, Police and Crime Commissioner elections in England and Wales, and UK Parliamentary Elections. This broadened the requirement for Returning Officers to provide support for people with a wide range of disabilities to vote in the polling station and removed restrictions on who can act as a companion to assist disabled voters, giving a disabled voter the choice of anyone over 18 years of age to assist them;
- Changes to **absent voting**, i.e. postal and proxy votes, applied at UK Parliamentary Elections in Great Britain, Police and Crime Commissioner elections in England and Wales, and at local elections and referendums in England. The proxy limits measure and the handling and secrecy of postal votes measure also applied to UK Parliamentary Elections in Northern Ireland, local elections in Northern Ireland, and will apply for elections for the Northern Ireland Assembly (though noting that postal votes cannot be handed in at polling stations and can only be returned to the Returning Officer in Northern Ireland).
- These include:
 - changes to the duration of postal voting arrangements (setting a maximum length of three years between re-applying);

- the handling of postal votes, limiting the number of electors for whom someone can hand in the postal votes for to a maximum of five electors (excluding their own) and banning political campaigners from 91 postal votes on behalf of some others;
- limiting the number of electors for whom someone can act as a proxy for to a maximum of two electors, or four if the electors live overseas;
- increasing the secrecy of postal and proxy votes;
- the introduction of an additional identity checking process for absent voting applications (for both postal and proxy voting), and;
- a new online service for absent vote applications (for both postal and proxy voting).
- Changes around **overseas electors**, to allow all British citizens living abroad who have been previously registered or resident in the UK the right to vote in UK Parliamentary Elections, beyond the previous 15-year limit, and extending the registration period for British citizens living abroad from twelve months to up to three years;
- To improve transparency of digital campaigning, a new **digital imprint** regime was introduced. It requires anyone paying for digital political material to be advertised, to explicitly show who they are, and on whose behalf they are promoting the material. Certain campaigners are also required to include an imprint on their other electronic material.

Additionally, the programme introduced other measures which are beyond the scope of this research, these include removing automatic voting and candidacy rights from EU citizens living in the UK, and further measures related to political campaigning and political finance.

This report also includes an economic evaluation which looks at the benefits and costs of the EIP, to assess its value for money as far as possible. Many of the EIP's benefits are difficult, if not impossible, to quantify in monetary terms. As such, cost-benefit analysis, while the default method for economic appraisal in government, was deemed unsuitable. Instead, cost-consequence analysis has been used. This approach reports a range of costs and consequences in their respective units, capturing the diversity of impacts. This allows for the presentation and assessment of the EIP's quantitative costs alongside its qualitative benefits which enables readers to make value judgments about the relative importance of costs and benefits.

1.2 Evaluation objectives

In May 2023, IFF Research were appointed by the previous UK Government to evaluate the EIP. This involved synthesising evidence from various strands of research and analysis and conducting new qualitative research. The first report, evaluating the

implementation of the voter identification policy and accessibility measures at the May 2023 local elections in England, was [published in November 2023](#).

This report presents the findings from the second year of the evaluation. It covers the implementation, at the July 2024 UK Parliamentary General Election, of the measures outlined above.

The evaluation included both process and impact components:

- The process component gathered evidence on implementation to examine the activities that were undertaken to deliver the measures introduced by the EIP. The analysis draws out lessons that can be learned about barriers and facilitators to effective implementation in the July 2024 General Election, that can inform their delivery at future elections;
- The impact evaluation assessed the effectiveness of all of the aforementioned measures in relation to the programme's goals, and to understand their impact on both electors and the electoral sector, including Electoral Registration Officers, Returning Officers and staff in electoral services teams and working in polling stations.

MHCLG developed research questions for the evaluation, which were then reviewed and refined by IFF Research following the development of the contribution claims. The full list of research questions can be found in Annex 1. These informed data collection design and the content of questionnaires and discussion guides used across the evaluation.

1.3 Methods

The evaluation adopted a theory-based approach drawing on theory of change models and contribution analysis. A theory-based evaluation was undertaken as it aligned with the intentions of the evaluation (to understand how the programme has worked, how and why impacts occurred), allowed for the complexity of the programme, and in the context of there being no suitable comparison groups due to the way that the measures were rolled out.

The theory of change models set out how each measure is expected to affect change in the short, medium and long term by mapping the expected inputs, activities, outputs, outcomes and impacts. The models were initially drafted by MHCLG and further developed by IFF Research.

Contribution analysis was then used to explain and test the validity of the theory of change models. A series of contribution claims were developed to articulate how each measure leads to change, while recognising the importance of other influencing factors. The contribution claims are subsets of the theory of change model that isolate and describe the relevant pathway to specific outcomes and impacts.

The contribution analysis tested the validity of the contribution claims, i.e. the extent to which they had been met. This approach used evidence from different strands of research, data collection and analyses from wider monitoring and evaluation activities for the EIP. These are summarised in Section 1.4 on ‘Evidence and Data Sources’.

Conclusions drawn on the validity of each contribution claim fall into one of four categories, as outlined in Table 1.1 below.

Table 1.1 Definitions for claim conclusions





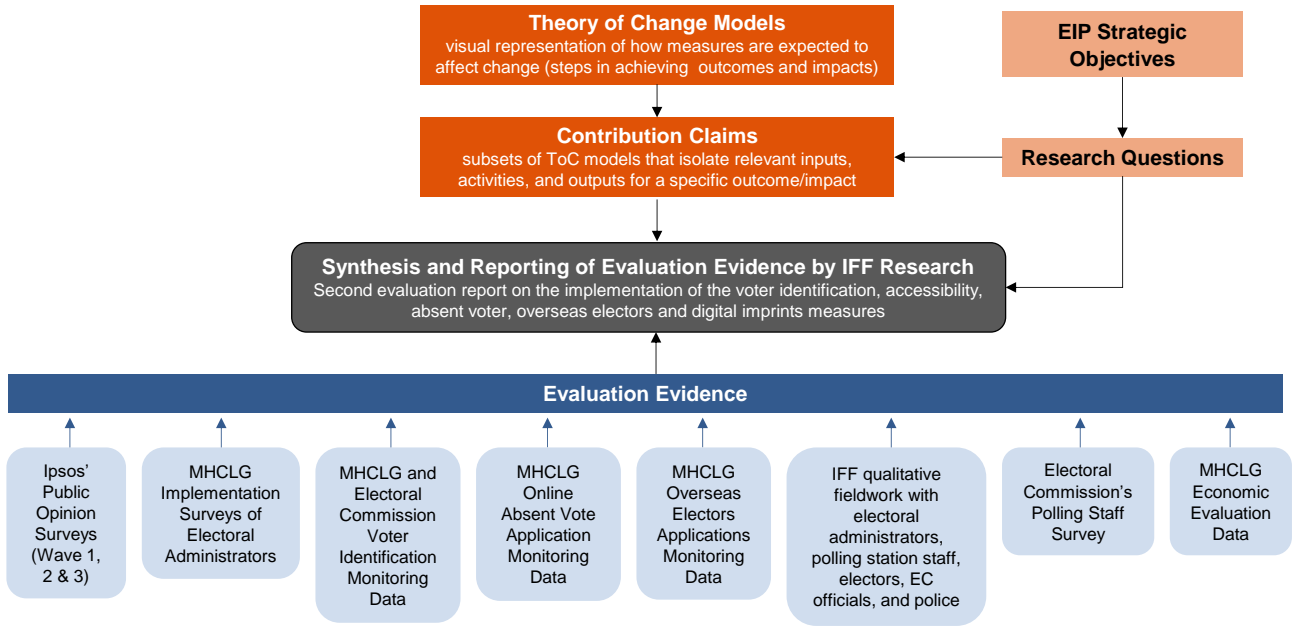
Symbol	Claim conclusion	Claim conclusion meaning
	Claim met	When evidence is strong and consistent across a variety of sources confirming that the claim has been met.
	Claim partially met	When there is evidence that some elements of the claim have been met, and evidence that other aspects of the claim have not been met / evidence for other aspects is too weak to conclude.
	Claim not met	When evidence is strong and consistent across a variety of sources confirming that the claim has not been met.
	Inconclusive	When there is insufficient evidence to draw a confident conclusion

Figure 1.1 provides a visual illustration of the evaluation design. It shows how the different strands of research and analyses feed into the overarching theory-based evaluation led by IFF Research. IFF Research’s synthesis and reporting of the evidence is structured around the theory of change models, contribution claims and research questions.

The individual steps for contribution analysis are outlined in Annex 2: Contribution analysis process.

Figure 1.1 Overview of the EIP evaluation design



1.4 Data sources and evidence

The evaluation brought together data from a range of qualitative and quantitative research, data collection and analyses, carried out by MHCLG, the Electoral Commission, Ipsos, and IFF Research. The main sources of evidence for the evaluation are listed below.

Public Opinion Survey (Ipsos): Ipsos conducted three waves of a Public Opinion Survey in January 2023 to collect baseline data before any measures were introduced, with a follow-up in May 2023 after the local elections in England and Northern Ireland, and a second follow-up in July 2024 following the General Election. The surveys are nationally representative of different geographies, with the baseline covering Great Britain, the first follow-up covering England and Northern Ireland, and the final wave covering all parts of the UK. These surveys collected data on public perceptions of voter identification, accessibility, absent voting and overseas electors measures, attitudes to voting, trust and satisfaction with the electoral system, and ease of voting.

Survey of Electoral Administrators (Implementation Surveys, MHCLG): Data on local authorities' and Valuation Joint Boards' (VJBs) implementation of voter identification, accessibility, absent voter and overseas electors measures was collected via an online survey. These were completed by electoral administrators (this includes Electoral Registration Officers and Returning Officers) and was administered shortly after the General Election. The survey was also sent to Electoral Office for Northern Ireland (EONI) and was adjusted to reflect the measures applicable there. It is important to note that elections in Northern Ireland are administered centrally by the EONI. Therefore, for Northern Ireland there is only one response.

Monitoring Data: This includes voter identification monitoring data collected in polling stations at the July 2024 General Election on the number of electors turned away because they did not have accepted photographic identification, and of those, the number who did not return, and data from the Voter Authority Certificate (VAC) application process. It also includes monitoring data on online absent vote applications and overseas electors applications since the service go live date, and between the announcement of the July 2024 General Election and polling day.

Electoral Commission's Polling Staff Survey: This includes data on local authorities' delivery of the voter identification, accessibility, and postal vote handling and secrecy measures. The data was collected via a post-election survey of Poll Clerks in England following the July 2024 General Election.

Economic Evaluation Data: MHCLG conducted an economic evaluation which looks at the benefits and costs of the EIP, to assess its value for money as far as possible. The main sources of evidence that contributed to this economic evaluation were as follows:

- **MHCLG Electoral Integrity Programme New Burdens Funding Data:** Data on funding provided to local authorities by MHCLG to cover costs incurred by the new measures across numerous payment windows from 2022/23 to 2024/25. These costs vary by local authority and include things like materials to deliver the new measures, as well as additional staffing requirements. Costs for the conduct of the July 2024 General Election are also included, funded by HM Treasury via the Consolidated Fund.
- **Electoral Commission Communications Costs:** Data on the Electoral Commission's expenditure on Voter ID public awareness campaign costs and partnerships' costs to provide information resources on Elections Act changes to various partner organisations, from 2022/23 to 2024/25. This was shared with MHCLG by the Electoral Commission for its inclusion in the economic evaluation.

Qualitative research (IFF Research): IFF undertook qualitative research with electoral services teams in 24 local authorities, polling station staff in 12 local authorities, and key groups of electors. An initial 24 local authorities were selected across England, Wales, Scotland and Northern Ireland. Within each local authority included in the evaluation, depth interviews were completed with staff responsible for delivering elections and electoral registration including Electoral Registration Officers, Returning Officers and Electoral Services Managers. Additionally, focus groups were carried out with polling station staff in a case study subset of 12 local authorities. Depth interviews were also carried out with electors across the UK, with characteristics relevant to the measures being evaluated. Ipsos also conducted depth interviews with select participants who had taken part in the July 2024 Public Opinion Survey.

In some instances, data was drawn from outputs outside of the main sources listed above. Where this is the case, the sources are directly signposted (via hyperlink) in the text.

The full methodology for this qualitative research, including the process for selecting case study local authorities and characteristics of these areas (for context) are outlined in Annex 3 (Methodology: Qualitative research). Information on the methodology, sample sizes and limitations of quantitative data sources are available in Annex 4 (Methodology: Quantitative data sources).

1.5 Key methodological considerations and limitations

All measures evaluated were introduced prior to the July 2024 General Election, but at varying time points. Voter identification and accessibility measures were introduced for the May 2023 local elections and are also covered in the year 1 evaluation report, while measures relating to absent voting, overseas electors and digital imprints came into effect in Autumn 2023.

Photographic voter identification requirements have been in place in Northern Ireland since 2003, and therefore findings relating to this measure do not incorporate experiences in Northern Ireland in the July 2024 General Election.

Relatedly, as outlined in Annex 11 (Divergence of measures between UK nations), not all measures apply to all types of election, and this varies by nation too. For example, accessibility measures apply to all elections across all nations, the overseas electors measures only apply to UK Parliamentary Elections across all nations, and absent voting measures vary across types of election and by nation. This, accompanied by the fact that local elections and Police and Crime Commissioner elections have taken place at varying times across the UK since May 2023, means it is important to acknowledge electoral service teams and electors will have had varying degrees of exposure to and experiences of each policy measure.

It is also important to acknowledge that the nature of local and Police and Crime Commissioner elections is somewhat different to General Elections – turnout is typically a lot lower, and those that do vote are more politically engaged.

The new measures were expected to have a greater impact (whether positive or negative) on specific elector groups (for example, those without accepted photographic identification for voter identification measures). These groups were of particular interest for the qualitative research. The incidence of most groups of interest is relatively low, which makes these groups challenging to recruit and subsequently to explore their views in the qualitative fieldwork. However, coverage across all groups of interest was achieved.

As detailed in Annex 2 (Contribution analysis process), contribution analysis works best when there is time for iterative adaptation of claims. However, due to the timeframe for the evaluation, it was not feasible to adopt an iterative approach, or to gather more evidence when contradictory findings or significant gaps became apparent. Similarly, the evidence base was not sufficiently developed to tell us whether some medium-term and long-term outcomes were met or not. These would need to be tracked over a longer period to allow their impacts to manifest. As a result, IFF's assessment on whether the claims have been achieved or not is inconclusive for a number of claims.

Responses from staff and electors are subject to social desirability bias, wherein participants may answer questions in ways that will be viewed favourably by others. This is where a theory-based approach, and evidence from multiple sources, shows its strength – this type of approach involves critiquing evidence and considering how consistently a finding is coming through from a range of perspectives. The conclusion that, for example, polling station staff sufficiently supported electors with disabilities would not be drawn from the perspective of polling station staff alone. That said, it is still important to flag the risk of social desirability bias.

The possibility of selection bias is another important consideration. The types of electors and delivery staff who chose to engage with the research may differ from those who did not respond (for example, they could have more 'extreme' views – positive or negative – evoking stronger desire to share them). This consideration predominantly applies to the qualitative findings and the Post-General Election Survey of Electoral Administrators.

In addition to the broader caveats and considerations, each evidence source also has its limitations. For the qualitative research, some examples of these limitations include purposive sampling, difficulties with recruiting niche groups, and social desirability bias. For the quantitative research, these limitations include data errors and survey bias. Additionally, some monitoring data, for example estimates of the number of newly enfranchised overseas electors, are produced using imperfect estimates, and caution should be taken when considering these results. These limitations are outlined in detail in Annex 3 (Methodology: Qualitative research and Annex 4 (Methodology: Quantitative data sources), but also referenced in the body of the report where most relevant.

The next chapters set out findings in relation to each of the five electoral measures, and the contribution claims for each.

2 Voter Identification

The Elections Act 2022 introduced the legal requirement to show an accepted form of photographic identification at polling stations in Great Britain, at some types of elections. Excluding by-elections, the July 2024 UK Parliamentary General Election was the third time this measure had been in effect in England (following the May 2023 and the May 2024 English local elections and Police and Crime Commissioner (PCC) elections), the second time this measure had been in effect in Wales (following the May 2024 Welsh PCC elections), and the first time this measure had been in effect in Scotland (with the exception of one by-election). The requirement to show photographic identification when voting has been in place within Northern Ireland since 2003.

The forms of accepted photographic identification are specified in the legislation (and can be found on [GOV.UK](https://www.gov.uk)). Expired photographic identification is also accepted, if it is on the list of accepted documents and if the photograph is of a good enough likeness to allow polling station staff to confirm the identity of the holder. Prior to the requirement for photographic voter identification, electors were identified by calling out an elector's name, allowing others present to raise concerns of personation.

All electors in Great Britain may apply for a free Voter Authority Certificate (VAC), issued by their local authority. VACs are a new form of photographic identification intended for electors who do not own another form of accepted photographic identification. Electors can apply online on GOV.UK, by post or in person at a local authority office.







The voter identification theory of change model (see Annex 6, Figure A.6.1) sets out the process of implementing the voter identification measures and their intended effects. Before the voter identification requirements were introduced, there were some key contextual factors underpinning the rationale for introducing the legislation:



- There is potential for personation (the offence of someone pretending to be someone else so they can use that person's vote) to occur in polling stations without detection;
- There was some evidence of personation occurring in polling stations; further, some cases may have gone unreported;
- Most people vote in person at polling stations, and the potential of personation could undermine trust and confidence in the integrity of our voting and democratic process;
- The previous system of calling out electors' name as a method of identification was no longer suitable for modern society.

Overall, the requirement for photographic voter identification aims to strengthen the integrity of the electoral system and ensure elections remain secure, fair and modern.


This evaluation is designed to assess whether the requirement for photographic voter identification was implemented as intended, and produced the intended effects, as set out in the theory of change model. A total of eight claims were identified from the model, detailing the key pathways between processes and effects. The extent to which claims had been met was then assessed based on the available evidence. Table 2.1 presents these claims and our conclusions against each. In the subsections that follow, evidence collected to either support or challenge whether each claim has been met is presented.

Table 2.1 Overview of voter identification contribution claims and conclusions

Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 1: Local authority staff meet their requirements by law		Claim met	There is sufficient evidence to demonstrate that local authority staff were well prepared for polling day and implemented their requirements in line with the law.
Claim 2: Polling station staff meet their requirements by law		Claim met	There is sufficient evidence to demonstrate that polling station staff were well prepared for polling day and implemented their requirements in line with the law.
Claim 3: Communication campaigns raise electors' awareness of voter identification		Claim partially met	Evidence indicates high awareness amongst electors of the need to present ID, but confusion persists surrounding which types of ID are accepted.
Claim 4: Communication campaigns raise electors' awareness of Voter Authority Certificates		Claim not met	Despite communication efforts, awareness and understanding of VACs remains low among electors, including those without ID.
Claim 5: Electors who want a VAC and are eligible are able to obtain one		Claim partially met	Evidence suggests that most electors who wanted a VAC obtained one, but there is still evidence of barriers to uptake amongst some groups.
Claim 6: Electors who want to have their identification document		Claim partially met	Evidence shows most polling stations, but not all, had the appropriate provisions for private

checked in private are able to do so			ID checks. However, there is not enough evidence to determine whether electors who wanted a private ID check had one.
Claim 7: Personation is identified more easily and reduces in the longer-term		Inconclusive	While ID checks were carried out successfully and feedback indicates that voter ID should make personation more difficult, there is currently limited evidence of the impact of voter ID on personation. Note that this is due to the challenge of proving personation, low number of cases, and difficulties with attribution.
Claim 8: Electors remain satisfied with the process and ease of in-person voting		Claim partially met	Voter identification had little impact on the experience of voting in person for most electors. There were mixed views on its impact on electors' confidence in the security and integrity of elections, but electors broadly felt it would increase their trust.

2.1 Claim 1: Local authority staff meet their requirements by law

	Claim met	There is sufficient evidence to demonstrate that local authority staff were well prepared for polling day and implemented their requirements in line with the law.
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The evaluation evidence is sufficiently strong and consistent to conclude that the claim 'local authority staff meet their requirements by law' was met. Electoral services teams ensured sufficient staff were in place for the implementation of the voter identification and VAC measures, delivered effective training, and provided sufficient guidance. However, despite reflections that electoral services teams were well staffed, consideration could be given toward any potential work that could be undertaken to reduce the impact on workloads.

2.1.1 Claim summary

Claim 1 aims to assess the degree to which local authority staff fulfilled their roles in implementing the photographic voter identification and VAC measures, as set out in the

Elections Act 2022 and subsequent secondary legislation. This is a critical causal step for the voter identification theory of change to hold true, as the work undertaken by local authorities is an essential prerequisite for successful implementation of the voter identification measures in polling stations on polling day.

For this claim to be met, local authority staff must have engaged with the voter identification changes in accordance with the legislation and taken practical steps to ensure voter identification measures could be implemented. Electoral administrators needed to ensure that:

- there were sufficient polling station staff to manage the additional tasks associated with the measures, without causing any disruption or delays to the voting process; and
- all processes were in place to enable electors who do not have an accepted photographic identification to obtain a VAC should they wish to, so they can vote in person if they choose to (discussed further in Claim 5).

If the initial practical steps are met, the assumption is that local authorities are able to process VAC applications, their confidence in delivering the requirements increases, and the voter identification policy is accessible to all electors. In turn, it is assumed this will increase electoral administrators' confidence in the electoral process and its protections from fraud.

A total of £25.9 million was spent to support electoral services teams and polling station staff to meet the requirements of law. Details of how this total was spent has been detailed at relevant points within Claim 1 and 2 findings.

Annex 6 sets out the elements from the voter identification theory of change that describe the pathway to change for Claim 1.

2.1.2 Readiness for implementation

Nearly two thirds (65%) of electoral administrators in Great Britain deployed more Poll Clerks as a result of needing to check voters' identification for the July 2024 General Election. Just 6% said they deployed additional Presiding Officers, and 28% said they deployed more Polling Station Inspectors. This has decreased since July 2023 (78%, 7% and 55% respectively) (Post-General Election Survey of Electoral Administrators).

Within the qualitative research, electoral services teams reported increased confidence and understanding of the voter identification measures prior to the July 2024 General Election. This was considered to be a result of previous engagement with the July 2023 local or Police and Crime Commissioner elections.

“I think we were very confident, and I think it goes back to we had elections in May 23 when it was first brought in, which I'm pleased we did, and I'm pleased we were able to use voter ID. So, we'd run through two elections with voter ID before the general election.”

(Senior Electoral Services Manager, England)

Despite hiring more polling station staff, in qualitative discussions electoral services teams mentioned difficulties in recruiting staff ahead of the July 2024 General Election, particularly more experienced Presiding Officers. They felt this was due to the additional responsibilities the voter identification measures placed on staff.

“In the last two years, we've lost quite a high number of Presiding Officers... the Poll Clerks aren't bothered, it's the Presiding Officers. Because it's them that's got the responsibility, and quite a few of them said, I don't want to do it anymore. So experienced Presiding Officers as our biggest issue.”

(Head of Electoral Services, England)

The experience of preparing for VAC requirements was slightly different, with 76% of electoral administrators stating the need to process VAC applications did not result in deploying additional staff (Post-General Election Survey of Electoral Administrators).

A total of £0.4 million was used for training registration staff on the new voter identification measures (MHCLG Economic Evaluation Data).

Nearly all electoral administrators reported receiving training on the voter identification and VAC measures ahead of the July 2024 General Election (97% and 95%, respectively) (Post-General Election Survey of Electoral Administrators). Most electoral services teams used the online training sessions and materials created by the Association of Electoral Administrators (AEA) for both their own training and that of polling station staff.

Overall, nearly all electoral administrators said they felt ready for polling day with regards to the overall implementation of the voter identification and VAC measures (97% and 96% respectively) (Post-General Election Survey of Electoral Administrators).

2.1.3 Delivery of voter identification and VAC measures at the July 2024 UK Parliamentary General Election

The evidence suggests that preparation for the July 2024 General Election was successful and led to the voter identification and VAC measures being well implemented. More than four-fifths (84%) of electoral administrators felt the voter identification measures were well

implemented, and 85% for VAC (Post-General Election Survey of Electoral Administrators).

Nearly all (94%) electoral administrators felt prepared in terms of staffing for the VAC requirements. Furthermore, the vast majority felt the correct number of staff had been hired within polling stations: 84% said they used the right number of Poll Clerks, and 93% the right number of Presiding Officers (Post-General Election Survey of Electoral Administrators). Polling station staff agreed, with nearly all (94%) stating there were sufficient staff in their polling station (Electoral Commission's Polling Staff Survey).

Electoral administrators found the Electoral Commission's guidance to be the biggest enabler in helping them implement the voter identification and VAC measures, 79% and 60% respectively (Post-General Election Survey of Electoral Administrators).

This was supported by the qualitative research, with electoral services teams noting the examples of accepted identification included in the [Electoral Commission's Handbook for polling station staff](#) as particularly helpful. There was no qualitative evidence for whether the Electoral Commission's guidance was equally helpful in delivering VAC measures.

"We all use the handbook from the Electoral Commission that I find really, really helpful. It's got pictures of what each ID looks like. So, you know, all of our polling stations, Presiding Officers had one, all of our staff had one in the office so it's quite simple to sort of navigate."

(Electoral Services Manager, England)

Electoral administrators also identified AEA training as a key enabler: 68% selected it as a top three enabler for voter identification, and 57% for VAC. Most electoral administrators said this training was effective, with 89% stating it was extremely or very effective in supporting the need to check voters' identification in polling stations and 81% for supporting their processing of VACs (Post-General Election Survey of Electoral Administrators).


This was supported by the qualitative research, with electoral services teams reflecting positively about this training, in relation to themselves and polling station staff.

"We had the online training from the Association of Electoral Administrators, which all poll staff had to undertake, and which I thought was excellent and must say it covered everything."

(Electoral Services Manager, Scotland)

Despite this, implementing the voter identification requirements had a big impact on the workload of electoral services teams. Just over four-fifths (82%) felt their workload increased as a result of the voter identification measures, and 73% as a result of the VAC measures (Post-General Election Survey of Electoral Administrators). This was also reflected in some of the qualitative interviews with electoral services team staff, mostly in relation to processing VAC applications. That said, an increase in workloads was expected as a result of the new voter identification requirements and related responsibilities, and this was not considered a significant issue when raised.

2.2 Claim 2: Polling station staff meet their requirements by law

	Claim met	There is sufficient evidence to demonstrate that polling station staff were well prepared for polling day and implemented their requirements in line with the law.
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The evaluation evidence is consistent and strong in supporting a conclusion that the claim ‘polling station staff meet their requirements by law’ was met. Effective training and sufficient staffing levels within polling stations laid a solid foundation for the successful implementation of the voter identification requirements on polling day.

Polling station staff expressed confidence in delivering these measures and agreed overwhelmingly that the election was well run at their polling station. Despite this, some minor challenges were highlighted, such as an increase in the time taken to process electors as a result of the requirements. Although some impact on processing time was expected, future work could focus on ways to improve the speed at which voters can be processed, particularly during busy periods, for example by exploring the potential benefits of using IT to process voters.

2.2.1 Claim summary

Polling station staff are key to ensuring the voter identification measures are effectively implemented on polling day. The theory of change assumes that polling stations are sufficiently staffed, and polling station staff are provided with effective guidance and training to enable them to conduct voter identification document checks on polling day in line with legislation.

The outputs and outcomes from these processes are that electors who present an accepted identification document and have it checked are able to vote; and polling station staff understand the guidance and training and feel confident delivering the voter identification requirements and applying them in accordance with the legislation. In turn, the impact will be that polling station staff and electoral administrators are more confident in the electoral process and its protection from fraud (discussed in more detail in Claim 7).

Note that costs referred to under the Claim 1 summary (section 2.1.1; MHCLG Economic Evaluation Data) would have also contributed to the implementation of activities under this claim.

Annex 6 sets out the elements from the voter identification theory of change that describe the pathway to change for Claim 2.

2.2.2 Preparedness to deliver the requirement

Of the total £25.9 million spent to support staff to meet the requirements of law, £18.2 million was used for hiring additional polling station staff, £5.2 million for additional training for current and new polling station staff, and £1.6m on implementation top-ups to allow flexibility to cover unanticipated costs of implementing the voter identification measures. Local authorities also claimed £0.6m in Justification Led Bids (JLBs) for additional polling station staff and other, related costs (MHCLG Economic Evaluation Data).

As discussed within Claim 1, 65% of electoral administrators said they deployed additional Poll Clerks for the July 2024 General Election, 28% deployed more Polling Station Inspectors, and 6% deployed additional Presiding Officers (Post-General Election Survey of Electoral Administrators). These recruitment levels were effective, with 94% of polling station staff stating that there were enough staff working at their polling station on polling day (Electoral Commission's Polling Staff Survey).

Almost all (97%) polling station staff reported receiving training ahead of polling day (Electoral Commission's Polling Staff Survey). As mentioned within Claim 1, most polling station staff received training that had been designed by the AEA, however some reported receiving in-person sessions with a trainer at their polling station.

Within the qualitative research, polling station staff reflected positively on the training they received, feeling it was comprehensive and detailed. In particular, polling station staff noted that the 'real life scenarios' included in the training, such as what to do if someone looks different from their photo, were helpful.

"All the Poll Clerks I came across in the station, it was the first time I've met them, were aware of the requirements when we went through, so the training had clearly landed."

(Polling station staff, England)

"I'd taken from the training things about looking at the eyes and nose and the mouth to see if they've changed because, obviously, quite a lot of people's hairstyles had changed and things like that."

(Polling station staff, Scotland)

This being said, some polling station staff felt improvements could be made to the training. In one area in England, Poll Clerks felt the training was too detailed, leaving them feeling overwhelmed. They also felt it was aimed more at Presiding Officers and included a lot of

information that was not relevant to their role. In another area, polling station staff felt the training should have focused more on how to deal with difficult situations, such as electors becoming agitated and aggressive.

“It was very intense. And I think because there was so much information, you kind of finished the training thinking, I’m just not going to remember all this.”

(Polling station staff, England)

Overall, 96% of polling station staff felt well trained on how to review photographic identification, and 94% felt well trained on how to help voters who wanted to show their identification document in private (Electoral Commission’s Polling Staff Survey). Again, this was reflected in the qualitative research, with polling station staff reporting that they felt prepared to deliver the voter identification measures ahead of polling day. Electoral services teams also felt the polling station staff in their respective polling stations were confident in delivering the measures.

2.2.3 Implementation on polling day

Nearly all (98%) polling station staff agreed that the election was well run at their polling station (Electoral Commission’s Polling Staff Survey). Polling station staff that took part in the qualitative research had a similar view, with those that held concerns ahead of polling day (such as electors not wanting to show identification, or difficulty verifying the identity of an elector) often saying that these concerns did not materialise. Generally, this smooth running was attributed to two factors:

- A high level of awareness among electors about the new requirement for photographic identification, resulting in a high rate of electors presenting with an accepted photographic identification on polling day;
- Having previously worked at elections where the voter identification measures were in place, such as the Police and Crime Commissioner elections, and local elections.

For the polling stations that had them, the use of IT for processing electors was reflected on positively. Most polling station staff (88%) who worked at a polling station with a tablet or computer register felt this was at least slightly better than working with a paper register only. Just under two-thirds (60%) said they could process voters much quicker with a tablet/computer than with a paper register (Electoral Commission’s Polling Staff Survey).

Within the qualitative research, polling station staff explained how, despite some initial teething problems, the use of IT made processing electors a much quicker and simpler task.

“So I was going to say, if we were back to the old paper and pencil way of doing it and we had to record what people's ID were manually, that would have had a major impact, but just clicking a box on the iPad made it super quick.”

(Polling station staff, England)

Within the qualitative interviews, polling station staff commented that adequate staffing levels also supported the successful delivery of the voter identification requirements. For example, by having enough people to process electors during particularly busy periods. However, this view was not held by all as polling station staff from both of the areas in Scotland that took part in the research felt they were understaffed.

“But, you know, the lull, sort of the 10 to half 11 in the morning, that was fine, but when it got busy, we were definitely understaffed.”

(Polling station staff, Scotland)

Polling station staff were also provided with the [Electoral Commission's Handbook for polling station staff](#) which includes example images of accepted photographic identification. They found this a helpful tool in explaining to electors what is accepted and what is not, and in turning away electors that did not present with any of the stated documents.

“What I did was try to study that book before we started just so I got a good idea of it. I think in most cases [...] it was fine, and then looking at the examples on the leaflet document was really useful as well. I think a lot of people didn't realise that, you know, bus passes were acceptable, so you know if someone says I forgot my driver's license then my automatic question would be ‘have you got this this or that?’”

(Polling Station Staff, England)

Whilst only 3% of polling station staff surveyed felt that it took a lot longer to process each voter on the day, 49% felt it took a little longer (Electoral Commission's Polling Staff Survey). However, the latter is a reduction of 13 percentage points compared to the survey of polling station staff that was conducted after the May 2023 local elections, where 62% felt it took a little longer (Electoral Commission's Polling Staff Survey May 2023).

Within the qualitative interviews, polling station staff also mentioned some challenges in delivering the voter identification requirements on the day, but these were relatively limited. For example, some polling station staff mentioned that during particularly busy periods, the requirement to check an elector's photographic identification created long queues, which led to frustration among some electors. They felt this was exacerbated when trying to

verify the identity of a voter that presented an out-of-date photographic identification, or when the voter did not look like their photograph.

However, of the polling station staff surveyed, only 5% agreed that long queues caused electors considerable inconvenience at their polling station (Electoral Commission's Polling Staff Survey).

"I know when it was busy, it was that that was people were getting quite sort of cross and, you know, [...] sometimes the queue was, like, way out of the door."

(Polling station staff, England)

2.2.4 Impact on polling station staff confidence in delivering the requirements

The preparations for polling day were effective in providing polling station staff with the confidence to deliver the new measures. In the qualitative research, polling station staff expressed confidence in checking photographic identification and explaining to electors why they needed to show it.

"But I felt quite comfortable asking for ID[...] because, you know, it's a requirement, it was covered in the training, so it had to be asked."

(Polling station staff, Wales)

"I anticipated more problems than there actually were, there were a handful of grumbles about the whole system, and [...] why am I being asked for ID [...], but you explain what's happened and what the change is and what the requirement is nowadays, [...] and you just manage their expectations."

(Polling station staff, England)

Local authority staff also felt that polling station staff were confident in delivering the voter identification requirements on polling day, more so than at previous elections. They felt the training, [Electoral Commission's Handbook for polling station staff](#), and previous engagement with elections where photographic identification was required, boosted polling station staff confidence.

"I think they were more confident in turning people away and I think that's because they have very clear training."

(Polling station staff, England)

"Yeah, pretty confident. I know a lot of people were panicking and worrying about it"


because especially in elections everyone fears change. But I mean, we were fortunate in the sense that we had elections last year, so we weren't going into this parliamentary year never having done voter ID before.”

(Polling station staff, England)

2.2.5 Impact on polling station staff confidence in the electoral process

While there is strong evidence that polling station staff met the requirements by law, over two-fifths (43%) of those with previous polling station experience reported that the July 2024 General Election was more difficult than previous UK General Elections. Just under two-fifths (44%) found it about the same (Electoral Commission’s Polling Staff Survey).

2.3 Claim 3: Communication campaigns raise electors’ awareness of voter identification

	Claim partially met	Evidence indicates high awareness amongst electors of the need to present ID, but confusion persists surrounding which types of ID are accepted.
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The evidence suggests that the claim ‘communication campaigns raise electors’ awareness of voter identification’ was partially met. There is strong evidence that electoral services teams delivered extensive communication campaigns on the voter identification requirement, on top of the national campaign delivered by the Electoral Commission, ahead of the July 2024 General Election. Combined with some electors’ experience of needing an accepted identification to vote in previous elections, this resulted in high awareness of the requirement. However, there was still some confusion related to which types of identification documents were and were not accepted, leading to some electors being turned away at polling stations, and some electors not voting because they wrongly believed they didn’t have an accepted form of identification.

This highlights the need for clearer communication of accepted forms of identification. Now that most electors are aware of the requirement, future campaigns could focus on highlighting what types of identification documents are and are not accepted.

2.3.1 Claim summary

To ensure electors who wish to vote in person are still able to, under the voter identification measure, it is essential that electors are aware of the new requirement.

The voter identification theory of change model states that, for this to be achieved, local authorities engage in communication campaigns to increase awareness in their locality. Ahead of the July 2024 General Election, the Electoral Commission also delivered a further national campaign and provided communication materials to local authorities. These activities were expected to raise awareness of the voter identification requirements, including the forms of identification that are and are not accepted, therefore enabling electors to bring an accepted form of identification to vote in polling stations on polling day. Areas were to undertake some activities to raise awareness ahead of local elections and/or Police and Crime Commissioner elections between May 2023 and the July 2024 General Election.

Annex 6 sets out the elements in the voter identification theory of change model, that describes the pathway to change for Claim 3.

2.3.2 Delivery of communication campaigns on voter identification

Between 2022/23 and 2024/25, the Electoral Commission spent a total of £18.5 million on communication campaigns related to voter identification. To support awareness raising, MHCLG provided funding of £12.5 million across local authorities to increase the size of poll cards so that they could include mandatory information on accepted identification documents to ensure that all electors were notified of the requirement for photographic identification. MHCLG provided a further £7.4 million for local communications campaigns (MHCLG Economic Evaluation Data).

All (100%) electoral administrators reported sending some form of communication to their local electorate about the voter identification requirement ahead of the July 2024 General Election. Nearly all (96%) electoral administrators in Great Britain were confident in the effectiveness of those communications (Post-General Election Survey of Electoral Administrators).

Electoral services teams took a multi-channel approach to communication campaigns, covering a wide variety of both digital and physical channels. Channels commonly used included social media (97%), candidate briefings (78%), emails to the electorate (43%), and information included in council tax bills (38%) (Post-General Election Survey of Electoral Administrators).

In the qualitative research, electoral services teams also mentioned using local radio campaigns, electronic billboards, posters in bus shelters or on waste lorries, as well as sending letters and including leaflets in poll cards.

“We did do a lot of promotion of voter ID. We did social media adverts, we spoke about it in all the candidate's briefings, local radio adverts and also our acting

Returning Officer who's our chief exec, he was interviewed on radio. We also had the need to bring voter ID printed in red on poll cards to make it stand out."

(Electoral Services Manager, England)

In qualitative interviews, many electoral services teams commented that the Electoral Commission's national campaign was effective in supporting their local campaigns. Some electoral services teams reproduced hard copy materials from the Electoral Commission's campaign, or reshared posts on social media, to amplify the message of the national campaign and keep communications consistent. Others used templates provided by the Electoral Commission but emphasised the importance of tailoring communication materials to the needs of their area, instead of relying solely on the national campaign.

"It was a good campaign. We did see [the Electoral Commission's] stuff all over the place and we really welcomed that. But there were definitely areas where we needed to plug gaps and that's what we did."

(Electoral Services Manager / Returning Officer, England)

Some electoral services teams developed targeted communications for population groups that were less likely to have an accepted photographic identification. These groups included ethnic minorities and faith groups, low socio-economic-status groups, LGBTQ groups, disability groups, the elderly (including those in care homes), and students. These activities involved consulting charities or community representatives to gain insight on the types of communications that would resonate with the target group. Electoral services teams sometimes gave materials to charities or group representatives to distribute amongst target groups, whereas others held workshops directly with particular groups to help raise awareness.

"We did some direct work with student unions in the universities to get the message across to students. We were contacting care homes to say 'could you put one person up to support residents in care homes', because obviously we now need voter ID or postal. We did quite a few workshops as well with different disability groups: we have one with people with hearing impairments, we had another workshop with adults with learning needs so we could tailor the workshop for them and a lot of that focused on how to register voter ID. We did videos on what to expect at a polling station."

(Electoral Services Manager, Wales)

In terms of the success of local campaigns, electoral services teams generally felt that they did everything they could to raise awareness of the new photographic identification

requirement. Using a combination of different channels and formats was cited as an enabler to reaching as many people as possible.

“I think we did everything that we could. I mean, it's on national TV, it's all over social media, it was on all the debates, we've put it on every single piece of communication we sent to people. I'm not entirely sure what else can be done.”

(Electoral Registration Officer, Scotland)

Local authorities claimed £0.1 million in JLBs for providing contact centre staff. These staff were hired to respond to elector queries about Electoral Integrity Programme (largely related to voter identification requirements) (MHCLG Economic Evaluation Data).

2.3.3 Electors' awareness of voter identification

Awareness of the requirement to present photographic identification was high within Great Britain, with 84% of voting age adults in the Public Opinion Survey reporting having heard at least a fair amount about it by July 2024 (rising from 31% in January 2023).

In the qualitative research, electoral services teams and polling station staff commented that some areas had already had local elections or recent Police and Crime Commissioner elections where photographic identification was required. This was a key enabler in bolstering awareness amongst the electorate. However, even in Scotland where, apart from one UK parliamentary by-election, the July 2024 General Election was the first election where photographic identification was required to vote, awareness was perceived to be high amongst electoral services teams and polling station staff.

“A few months prior to the election, nobody really knew about the requirement to produce ID in Scotland at the polls because we hadn't had May polls, whereas a lot of English authorities had. And by much closer to the election, the awareness of photo ID at the polls in Scotland was higher than the rest of the UK. So, there was a raising of awareness, there's no doubt about that.”

(Electoral Registration Officer, Scotland)

Conversely, 14% of voting age adults had heard nothing at all about the requirement to present photographic identification at polling stations. Ethnic minority groups (22%), adults with a disability that impacted their ability to vote in person (19%) and younger adults aged 18-44 (18%) were more likely to be unaware of the requirement (Public Opinion Survey 2024). These groups were also more likely to be unaware of the requirement ahead of the 2023 local elections (Public Opinion Survey 2023), despite electoral services teams' efforts at targeting communications towards these groups since then.

The most common sources of awareness of the photographic identification requirement among voting age adults aware of the requirement were government adverts on TV/radio (39%), word of mouth (36%), somewhere else on TV/radio (31%), and social media (23%) (Public Opinion Survey 2024). This was broadly reflected in the qualitative research, where electors reported first hearing about the requirement through the news, political debates, or discussions on social media.

Around one-fifth (21%) of voting age adults aware of the requirement said they were informed via postal communications from their local council (Public Opinion Survey 2024). In the qualitative research, there was a mix of electors who recalled receiving a letter from their local council about the requirement and those who didn't remember. Those who did

recall receiving a letter felt that the message of needing to bring photographic identification to vote was clear, but they did not read much of the accompanying detail.

“Yeah, I received a letter, but I think once I skimmed and saw what you could take as ID, I didn't really take an awful lot of further interest in it because we'd got the ID, all we've got to do is take it with us.”

(Elector, voted in person, older (over 65))

A similar proportion (22%) of voting age adults aware of the requirement said that they saw an advert from the Electoral Commission about the new requirement. When prompted with examples of Electoral Commission advertising, more than half (52%) of voting age adults said they had seen this (Public Opinion Survey 2024).

Overall, the main message of the need to bring photographic identification was clearly received by most electors. This was reflected in the very low incidence of electors being turned away when they first attempted to vote in polling stations: only 0.25% of electors in polling stations were initially turned away on polling day because they didn't have an accepted identification, and only 0.08% of electors in polling stations did not return with an accepted identification. The proportion of electors turned away at polling stations at the July 2024 General Election decreased compared to 0.7% at the 2023 local elections (Voter Identification Monitoring Data), which could indicate an increase in awareness of the requirement. Some caution with this interpretation is needed, however, as some polling stations had informative posters or greeters outside, who would turn away any electors who didn't have photographic identification with them without recording them as 'turned away'. The data from polling stations shows that the proportion of electors turned away from polling stations was slightly lower where a greeter was present (0.20% compared to 0.28%) (Voter Identification Monitoring Data). Therefore, the actual proportion of electors who didn't bring their photographic identification to the polling station is likely to be higher than recorded.

Evidence suggests, however, that electors were unclear on what types of identification are and are not accepted in polling stations. In most cases, this did not cause significant issues as most electors voted with a driver's licence or passport. In the qualitative research, however, polling station staff and electoral services teams reported that some electors tried to vote with forms of identification that weren't on the accepted list. Commonly rejected forms of identification in Great Britain included work passes (NHS, police and Local Authority), shotgun licences, digital images of accepted identification documents and veteran cards (Post-General Election Survey of Electoral Administrators).

“There was some confusion over what was a valid form of ID. So, we had people who knew that they needed to bring photographic ID. But there were a few people

who, for example, turned up with their shotgun licence and thought that that would be something that they could use, or a veteran's form of ID because we have quite a large veteran community. So to some extent, it was more the case that people were bringing the wrong type of ID rather than none at all."

(Deputy Returning Officer, England)

Some electors were also unaware that out-of-date identification documents could be used if the photograph was of good likeness. In some cases, this led to unnecessary applications for VACs, or electors not voting due to an incorrect belief that they did not have accepted identification.

"I mean, put it this way, if I had known that an expired passport would have sufficed, I would have taken my expired passport and voted. But as I did not know that that would be an acceptable form of ID because it is expired, I didn't."


(Elector, did not vote)

In qualitative interviews, electoral services teams in Wales and Scotland expressed concerns about potential confusion amongst electors about the voter identification requirements only applying in reserved elections in their nations. However, this was not mentioned in qualitative research with electors themselves. Furthermore, according to the Post-General Election Survey of Electoral Administrators, only 4% of electoral administrators cited confusion about the requirements only applying to reserved elections in Scotland and Wales as a concern about implementation of the requirements.

"I think for us it's going to get harder because there's gonna be a lot more mixed messaging for the Welsh Parliament election now in 2026. Even with our byelections we see people turning up with ID where they don't need it."

(Electoral Services Manager/ Returning Officer, Wales)

2.4 Claim 4: Communication campaigns raise electors' awareness of Voter Authority Certificates

	Claim not met	Despite communication efforts, awareness and understanding of VACs remains low among electors, including those without ID.
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The evidence suggests that the claim 'communication campaigns raise electors' awareness of Voter Authority Certificates' was not met. Despite the fact that most electoral

administrators felt that the option to apply for a VAC had been effectively communicated via a range of channels, a lack of elector engagement with communication efforts meant that awareness was low amongst electors, including those that did not have an accepted form of identification. There were two factors that may have affected electors' engagement with the campaign. Firstly, many electors had an accepted form of identification so did not need to be aware of VACs. Secondly, campaign materials focused heavily on the voter identification requirement, potentially detracting electors' attention from information on VACs.

To boost awareness amongst electors without photographic identification, future campaigns could focus more on promoting VACs in a way that stands out from the voter identification requirements. It could also be beneficial for more electoral services teams to carry out engagement activities with individuals more likely to need a VAC. This could be encouraged by sharing examples of good practice where community engagement has been effective in raising awareness.

2.4.1 Claim summary

The availability of VACs is crucial in ensuring that electors who don't have an accepted form of photographic identification are able to vote. In order for electors to be able to use a VAC to vote, they must first be aware that it is an option available to them.

Similar to Claim 3, the voter identification theory of change outlines that local authorities engage in communication campaigns to increase electors' awareness of VACs, and how to apply for one. If communicated successfully, then electors who do not have photographic identification should be able to apply for a VAC, enabling them to have used one to vote in the July 2024 General Election.

Annex 6 sets out the elements from the voter identification theory of change that describe the pathway to change for Claim 4.

Note that the impact of VACs being available, processes for obtaining them, incidence of applications and use in polling stations from the elector perspective are explored under the next claim ('Claim 5: Electors, who want a VAC and are eligible, are able to obtain one').

2.4.2 Delivery of communication campaigns on Voter Authority Certificates

Some of the funding outlined under the Claim 3 summary (see 2.3.1) to support awareness raising of the voter identification measures, would have also contributed to awareness raising activities for VAC (MHCLG Economic Evaluation Data).

According to the qualitative research, electoral services teams communicated the option to apply for a VAC alongside communications about the voter identification requirement.

Therefore, the same communication channels used to promote the voter identification requirements were also used to promote VACs (see 2.3.2 Delivery of communication campaigns on voter identification, for more information).

“I think we included a line that if you didn't have the relevant ID, or if you felt that your voter ID didn't resemble you anymore, you could apply for a Voter Authority Certificate.”

(Electoral Services Manager, England)

Some electoral services teams communicated where electors could go to get support with VAC applications, via, for instance, targeted emails or adverts in local newspapers or magazines.

Similarly to voter identification communication campaigns, some electoral services teams also engaged directly with population groups that were more likely to require a VAC, such as those with learning difficulties, elderly people or members of the trans community.

Most (95%) electoral administrators in Great Britain reported confidence in the effectiveness of communication campaigns in promoting VACs (Post-General Election Survey of Electoral Administrators). However, in the qualitative research, some reflected that the option could have been made clearer, as it was not strictly emphasised in communication campaigns surrounding the voter identification requirements. This view was supported by perceptions from electors (see 2.4.3, Elector awareness of Voter Authority Certificates, for more information).

“I don't think there was misinformation out there, but I think we promoted so much on the need for voter ID that sometimes it got lost in translation that they could apply for a VAC. Often you'd see a post on social media saying I haven't got the right ID I've lost my right to vote and it's like, no, it's ok, you can apply for this. So, I think there was probably more that could be done on the Voter Authority Certificate, but maybe that needs to be on particular hard-to-reach groups or certain categories.”

(Electoral Services Manager, Wales)

2.4.3 Elector awareness of Voter Authority Certificates

Despite coverage from communication campaigns, awareness of VACs remained low amongst electors. Only 18% of voting age adults reported knowing a great deal or fair amount about VACs by July 2024 (Public Opinion Survey 2024). This is consistent with May 2023 (21% of voting age adults in England), but an increase compared to January 2023 (8% of voting age adults in England). Low levels of awareness may reflect the very

small proportion of voting age adults without an accepted form of identification (2%) (Public Opinion Survey 2024).

Awareness of VACs was similarly low among electors without an accepted form of identification; only 16% had heard a great deal or fair amount about VACs, and 31% had heard of them but did not know much about them. This suggests that lack of awareness of VACs could have contributed to electors without an accepted photographic identification not being able to vote.

In the qualitative research, most electors had not heard of a VAC or were only vaguely aware of it as an option. Electoral services teams also felt that electors were not sufficiently aware of VACs, despite their communication efforts.

Of voting age adults that were aware, the most common source of awareness was word of mouth (21%), followed by official UK government advertising on TV/radio (18%), and somewhere else on TV/radio (18%) (Public Opinion Survey 2024).

Similarly, the few individuals that were aware of VACs in qualitative interviews had heard about them through adverts or on the news. Some electors who used a VAC to vote reported hearing about the option through word of mouth. They then visited the government website for more information.

“It was covered on the news that if you don’t have any of the listed forms of ID you can apply for something, I just can’t remember what it was called.”


(Elector, voted in person, ethnic minority)

Those that had seen VACs advertised in the communication campaign on the voter identification requirements felt that it was not clearly highlighted. One elector, who did not vote and was not aware of the VACs, said that they received a leaflet from their local council about the voter identification requirement, but didn’t recall it saying anything about the option to apply for a VAC.

“Every time I saw videos and pictures about needing your ID, the idea that you could get the voter authentication one was always included right at the bottom in way smaller writing. It’s something your brain glances over.”

(Elector, voted in person)

2.5 Claim 5: Electors who want a Voter Authority Certificate and are eligible, are able to obtain one

	Claim partially met	Evidence suggests that most electors who wanted a VAC obtained one, but there is still evidence of barriers to uptake of VACs amongst some groups.
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The evidence suggests that the claim ‘electors who want a VAC and are eligible, are able to obtain one’ was partially met. Electoral services teams were able to process the vast majority of applications that came in before the deadline, with only a small proportion of applications being rejected. However, uptake of VACs was lower than forecasted by electoral services teams. Furthermore, among voting age adults without accepted identification, a minority said they would be likely to apply for a VAC. Electoral services teams and electors felt this could have been because some electors lacked motivation to take the additional step of applying for a VAC to be able to vote. There was also some limited evidence to indicate that the process of obtaining a VAC was less accessible to electors with poor internet access, and electors who lack documentation.

To encourage eligible electors without accepted photographic identification to apply for a VAC, future advertising could emphasise how easy it is to apply for one and communicate the application process step-by-step.

While electoral services teams were able to effectively process VAC applications, they identified some challenges with the application service on the GOV.UK website and the Electoral Registration Officer Portal (ERO Portal) that could be addressed to improve efficiency. This included: making guidance on criteria for accepted photographs clearer on the GOV.UK application service to prevent electors uploading photographs that did not meet the requirements; and, improving the functionality of the ERO Portal to allow electoral administrators to keep track of the status of applications and correspondence with electors.

2.5.1 Claim summary

The ability to apply for, and receive, a VAC ahead of polling day is crucial in ensuring that electors without accepted photographic identification are able to vote. The success of this claim depends on some of the previous claims: local authority staff need to be sufficiently prepared to process VAC applications (Claim 1), and electors need to be aware of the option to apply for a VAC (Claim 4).

The voter identification theory of change model outlines that, if processes and resources are allocated for VAC processing, and electors without photographic identification are aware of the VAC option, then electors who want a VAC will be able to apply for one before the deadline and receive it before polling day. Ultimately, this will ensure that

electors without an accepted photographic identification are not deterred from voting by the voter identification requirements and are still able to vote if they would like to.

Annex 6 sets out the elements from the voter identification theory of change that describe the pathway to change for Claim 5.

2.5.2 Delivery of Voter Authority Certificate Requirement

The majority (96%) of electoral administrators felt fairly or very prepared to implement the VAC requirement, and support electors with applications. To help with processing VAC applications, nearly one-fifth (18%) of electoral administrators in Great Britain recruited additional staff (Post-General Election Survey of Electoral Administrators).

In the qualitative research, electoral services teams discussed having recruited extra staff (some permanent and some temporary) as contingency for the forecasted volume of applications. A few also mentioned having individuals or teams dedicated to processing applications.

Overall, between service go-live and the deadline for the General Election, there were 213,600 VAC applications, accounting for 0.45% of the local government electorate and 0.47% of the parliamentary electorate (Voter Identification Monitoring Data). Based on feedback from the qualitative research with electoral services teams, the number of applications that weren't processed by the deadline was negligible. In the few cases where applications were not processed by the deadline, this was primarily due to electors not replying to outstanding queries.

The majority (96.20%) of VAC applications were made online. Of the total number of applications made, only 7.78% were rejected (Voter Identification Monitoring Data). To note, there is no limit on the number of applications an elector can make. Therefore, electors whose applications were rejected were able to reapply, meaning some could have successfully applied for a VAC on a second attempt. Some electors may have successfully applied for a VAC more than once, for example, if they lost the first VAC they received. Therefore, the proportion of electors who applied for a VAC but did not successfully receive one could be lower than 7.78%.

To support delivery of this measure, MHCLG provided £8.9 million for local authorities to hire additional staff (or pay current staff more) to process VAC applications, and less than £0.1 million for equipment to produce VACs in person. This funding was provided through a combination of grant and JLB funding, and also covered these activities for by-elections (MHCLG Economic Evaluation Data).

In the qualitative research, electoral services teams tended to state that the processing of VAC applications was straightforward. Furthermore, around one-fifth (22%) of electoral administrators in Great Britain reported having no concerns with processing VAC applications (Post-General Election Survey of Electoral Administrators).

However, there were some challenges that affected the efficiency of processing VAC applications. The most significant concerns were issues with applicants' photos (73%), follow-up work with applicants (69%) and ERO Portal software (15%) (Post-General Election Survey of Electoral Administrators).

Detail on the nature of these challenges was explored in the qualitative research. Electoral services teams described receiving photographs that didn't fit the correct dimensions, with the subject's face at an angle, or too much content in the background. This led to lots of back and forth with applicants to acquire an appropriate photograph, a process that was made even more challenging if applicants had provided incorrect or insufficient contact information or were unresponsive to contact attempts.

"The challenges were the photos more than anything. What we say is it's a replica of a passport photo. So, we were getting people in pubs on holidays or weddings, selfies, people in the background. There was nothing clear about it. Yeah, people, dogs. We had people upload selfies with dogs."

(Electoral Services Manager, England)

"We've had some very, very bad photographs, and people that seem to want filters on their photographs, and people who don't have the documentary evidence to back it up, and also lots of people who have been applying for VACs that are not registered."

(Electoral Registration Officer, Scotland)

As well as being a prominent concern for electoral services teams, a photograph not meeting the requirements was the most common reason for an application being rejected (30.57%). This was followed closely by applicants not being registered to vote (27.27%) (Voter Identification Monitoring Data). In the qualitative research, electoral services teams also identified unregistered applicants as a challenge. Some suspected that electors mistook the VAC application portal on the GOV.UK website for the portal used to register to vote.

"A lot of people were applying for a VAC, but they weren't registered, so they were applying for a VAC rather than registering to vote. And so we were having to make

that contact with them: ‘You’re not registered.’ ‘Well, that’s what I thought I’ve done.’ ‘No, no, you haven’t. You’ve applied for a Voter Authority Certificate.’”

(Head of Electoral Services, England)

Challenges associated with follow-up work with electors were compounded by difficulties with the ERO Portal functionality. In qualitative interviews, electoral services teams reported that the ERO Portal lacked the functionality to keep track of the status of applications and any correspondence with electors. This meant that some electoral services teams used external spreadsheets to monitor applications, which they felt was inefficient and duplicated effort.

“I think what was a little bit frustrating and a bit disappointing is we didn’t have a monitoring system within the portal, to record queries, to record follow-ups, so if we had to chase for additional evidence, we didn’t have that monitoring tool in the portal. We developed a separate spreadsheet which was quite detailed and worked really well for us, because we felt that we needed that to have a handle on it and to have a good audit trail of where we were in the follow-up process. Ideally that needs to be in the system.”

(Electoral Services Manager, England)

However, there were fewer VAC applications than anticipated by the electoral services teams. The low volume of applications meant these issues were managed, and electoral services teams did not feel overwhelmed by the new process.

“When you consider that every elector then got communication about that, you would have expected maybe a few hundred a day. Very rarely did it break above kind of 10, 15, 20 coming in. They were really a trickle.”

(Electoral Services Manager, Scotland)

Some electoral services teams provided in-person support with VAC applications, for electors who struggled with taking their own photograph or using the GOV.UK application portal. Less than £0.1 million was provided to local authorities for equipment to produce VACs in person (MHCLG Economic Evaluation Data).

Support was often provided in spaces such as libraries, town halls, or customer service centres. Some electoral services teams provided more targeted support by hosting events with charity partners to help with applications, or in one instance going into electors’ homes. Electoral services teams reflected that these support provisions were crucial in making VACs accessible to all members of the community.

“We had some instances where we had them going and actually taking pictures in the electors' homes if they were struggling to provide a photograph, or they didn't have a phone that could take photographs, or so on. We had people that would come into the public counter and request one, so we had facilities to take photographs. These were quite rare, but it was offered if people said, ‘I just can't provide a photograph’, we'd say, ‘well, we can come and take a photograph for you.’”

(Electoral Services Manager, Scotland)

2.5.3 Elector use of Voter Authority Certificates

Only 0.36% of electors who voted in person at the July 2024 General Election used a VAC to prove their identity (Voter Identification Monitoring Data).

In the qualitative research, electoral services teams reported receiving fewer applications for VACs than expected, relative to the volume of electors they estimated did not have accepted identification in their area. They felt this could indicate that some eligible electors did not apply for or obtain a VAC, although the proportion who would have wanted to vote is unknown.

“Our application rate for VACs was very, very low. It's nowhere near forecast. But what we can't tell is, is it because people have got their ID or is it that people just are not bothering? Unfortunately, there's nothing we can do to find that out.”

(Electoral Services Manager / Deputy Returning Officer, England)

Critically, when looking at voting age adults who didn't have photographic identification, only a quarter (25%) said they would be likely to apply for a VAC (Public Opinion Survey 2024). In qualitative research, electors and electoral services teams commented that the application process created an extra step which reduced the convenience of voting: therefore, electors without identification may have lacked motivation to take the additional step of obtaining a VAC, and were not able to vote as a result.

Some electors, such as those with learning disabilities or other cognitive impairments, reflected that the new process of applying for a VAC could have been overwhelming. However, no electors with learning disabilities or other cognitive impairments who attempted to apply for a VAC were interviewed in the qualitative research, so there is no direct evidence for this.

“The process, whether it was for a postal vote or for voter ID, if you're working out whether you'd got the right ID anywhere and didn't need to get a local authority certificate, all of that was quite intimidating. I think part of what happened is they

[electoral services teams] may feel that they can help support people to do that themselves, but it really takes time and force. You could quickly be overwhelmed. There are all sorts of challenges.”

(Elector, voted in person, learning disability)

Some electors and electoral services teams also reflected that the application process may not have been accessible to electors who are less digitally literate or lack internet access. While some electoral services teams did provide in person support with applications, there is little evidence to indicate whether all eligible electors were aware that this was an option. Furthermore, some electors and electoral services teams speculated that individuals whose disabilities or circumstances make it difficult to leave the house would have struggled to access the in-person support provided.

“On one hand, the people that don't have ID, yes, they can have a form of ID [with VACs], but what about the people that don't know how to access the internet, and they have to apply for it? How do they get it? Or if there's an in-person way of getting it, how do they know they can go get it at that place as well?”

(Elector, voted in person, wasn't aware of VID requirement)


In the qualitative research, some electors who had tried to apply for a VAC also faced challenges with providing documentation to prove their identity in the VAC application process. One elector said they felt uncomfortable providing their national insurance number to the application portal, and didn't have a birth certificate that matched their current name.

Electors who had successfully applied for a VAC reported mixed experiences. One elector said that the application process was a 'hassle' because their photograph was rejected repeatedly. Others, however, said the application process was very smooth, and they were satisfied with how quickly they received their VAC.

“The other thing that was quite interesting was that when speaking to those voters who had presented them [VACs], I universally got good feedback from them about how straightforward and quick the process was of applying for and receiving their Voter Authority Certificate.”

(Polling station staff, Scotland)

2.6 Claim 6: Electors who want to have their identification checked in private are able to do so

	Claim partially met	Evidence shows most polling stations, but not all, had the appropriate provisions for private ID checks. However, there is not enough evidence to determine whether electors who wanted a private ID check had one.
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Overall, the evidence suggests that the claim ‘electors who want to have their identification checked in private, are able to do so’ was partially met. Evidence from both electoral administrators and polling station staff indicates that although not all polling stations put formal privacy provisions in place, this did not prevent any electors from being able to vote. Some electors called for the availability of privacy provisions to be more openly communicated within polling stations. However, there is currently no evidence from the perspective of electors who used, or might have wanted to use, this provision.

2.6.1 Claim summary

The voter identification legislation included the requirement that electors who want to have their identity confirmed in private at a polling station, are able to do so. The extent to which this claim is achieved is largely dependent on the extent to which the earlier claims in this evaluation were achieved. If local authorities and polling station staff are resourced and appropriately trained (Claims 1 and 2) and communications have been effective (Claim 3), then electors who wish to take up this facility would come forward and polling stations would be ready to provide this facility. If this claim is met, then no one would be deterred from voting due to privacy concerns. In turn, this would contribute to trust in the integrity of the voting process among both those taking up the option of the privacy provisions and the wider electorate.

Annex 6 sets out the elements from the voter identification theory of change that describe the pathway to change for Claim 6.

2.6.2 Preparedness to implement identification checks in private

The vast majority (84%) of polling station staff agreed that they were well trained on how to privately check electors’ identity, although this is lower than the 97% who reported receiving training (Electoral Commission’s Polling Staff Survey).

MHCLG provided £0.7 million for equipment for private photographic identification checks, and a further £0.1 million of funds were spent on equipment storage (obtained through a combination of grant and JLB funding) (MHCLG Economic Evaluation Data).

Most electoral services teams and polling station staff in the qualitative research reported that they were able to comply with the requirement. At some polling stations, this requirement was met using privacy screens or a private room set aside for this purpose.

However, some electoral services teams did not feel the need for dedicated privacy provisions due to the demographics of their area, and an underlying assumption that checks in private would not be needed.

In some instances, where formal privacy provisions had not been put in place, polling station staff reported 'ad hoc' ways of private identification checks being delivered: for example, taking electors to an outside area without other people, or repurposing a corner booth to privately check identification.

Though not a requirement, many polling station staff and electoral services teams felt it was important to have female staff available at every polling station. This was so that women with face coverings could have their identity checked privately by a female member of the polling station staff, if that was the elector's preference, as their religion may not allow them to uncover their face in front of men.

2.6.3 Delivery of private identification checks on polling day

In total, 5,237 electors (0.03% of in-person voters) had their identity checked in private across all local authorities in the July 2024 General Election. Around half (52%) of constituencies received at least one request for a private identification check on the day. However, this data was only based on 612 out of 632 constituencies (Voter Identification Monitoring Data). In the qualitative research, very few polling station staff reported requests for a private identification check. Electoral services teams and polling station staff were positive about the preparedness and provision for private identification checks, and felt they used their discretion effectively about the type of facilities offered, depending on the characteristics of the local area.

There was no anecdotal evidence from polling station staff or that a lack of privacy provisions prevented an elector from having their identification checked in private if they wanted to, or ultimately from voting.

In the qualitative research, it was common for electors to state that they were not aware of the option to have identification checked in private. These electors said they did not personally want their identification to be checked in private, which could partially explain the lack of awareness. However, many felt that privacy provisions needed to be more clearly signposted within polling stations, so that other electors (who may have wanted a private identification check but may have not been aware of the option) were aware of their rights and the option to show identification in private.

2.6.4 Impact on electors that require private checks

Overall, a small proportion (6%) of electors who voted in person said they felt uncomfortable with having to show their photographic identification in order to vote (Public

Opinion Survey 2024). However, it is not possible to determine whether these electors felt this way due to the requirements, as opposed to feeling uncomfortable with having their identification checked in public more generally. Given the very low numbers of electors using privacy provisions (0.03% of in-person voters), it was not possible to gather the perspectives of this group of electors through the qualitative fieldwork. As a result, there is no evidence from the perspective of electors on their experience of the process or about any perceived barriers to requesting private checks.

2.7 Claim 7: Personation is identified more easily and reduces in the longer-term

?	Claim inconclusive	While ID checks were carried out successfully and feedback indicates that voter ID should make personation more difficult, there is currently limited evidence of the impact of voter ID on personation. Note that this is due to the challenge of proving personation, the low number of cases, and difficulties with attribution.
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There is currently not enough evidence to determine whether the claim ‘personation is identified more easily and reduces in the longer-term’ was met, resulting in the claim being inconclusive. Polling station staff were well prepared to carry out the identification checks, both in terms of training and staffing, and faced minimal challenges with delivery of checks on polling day. However, both public perception of personation and cases of detected personation have remained stable, and there’s no way to know whether there were any cases that went undetected. Therefore, it cannot be determined whether or not the identification checks made it easier to detect personation attempts. While there was the perception that the identification checks made it more difficult for electors to vote fraudulently, may have deterred attempts of personation, and would make it easier to detect personation attempts had they occurred, some electors also reflected that the identification checks don’t necessarily guard against use of fraudulent identification documents.

Once longer-term data on the prevalence of personation becomes available, it may be easier to assess this claim by comparing data before and after the introduction of the photographic voter identification measures. However, even if long-term data reveals a downward trend in fraud over time, it will not be possible to directly attribute this to the introduction of photographic voter identification requirements

2.7.1 Claim summary

To achieve its goal of strengthening the integrity of the electoral system, the voter identification measures are designed to deter and prevent personation and provide the electorate with greater confidence in the security of the voting system. As part of this, the introduction of the photographic voter identification requirement is intended to make any personation that does occur easier to detect, and in the longer-term reduce the incidence of, electoral personation in polling stations: that is, the offence of someone pretending to be someone else so they can use that person's vote. Therefore, assessing the impact of the voter identification requirements on instances and perceptions of personation is a central component of the evaluation.

The voter identification theory of change model outlines that in order to detect cases of personation more easily and reduce instances in the longer-term, local authority and polling station staff need to have sufficient resources and be prepared to carry out identification checks (discussed in Claims 1 and 2). If polling station staff are able to carry out accurate identification checks, this also enables them to detect cases of electors attempting to vote under a name that is not theirs. This is ultimately intended to decrease cases of personation in the longer-term, through deterring personation attempts, and in turn increase trust and confidence in the security and integrity of voting and democratic practices.

Note that costs referred to under the Claim 1 summary (section 2.1.1; MHCLG Economic Evaluation Data) would have also contributed to the implementation of activities under his claim.

Annex 6 sets out the elements from the voter identification theory of change that describe the pathway to change for Claim 7.

2.7.2 Preparedness for carrying out identification checks

As discussed in Claims 1 and 2, the vast majority of electoral services teams and polling station staff felt well prepared for carrying out identification checks (Electoral Commission's Polling Staff Survey), and attributed this to the Electoral Commission's guidance, AEA training, and experience gained from any previous, smaller-scale elections (local and Police and Crime Commissioner). Most electoral administrators in Great Britain also felt they had the appropriate number of Poll Clerks to carry out identification checks (Post-General Election Survey of Electoral Administrators).

In the qualitative research, a key role that helped electoral services teams feel more prepared were greeters. In constituencies where at least one greeter was used (57.8%, Voter Identification Monitoring Data), their role of checking whether electors had photographic identification before they entered the polling station was seen as important to avoid wasting electors' time and keep queues manageable.

2.7.3 Delivery of voter identification checks

As discussed in Claim 2, polling station staff consistently and successfully carried out voter identification checks for electors on polling day. In the qualitative research, polling station staff reported that the delivery of voter identification checks went smoothly. Some said that the [Electoral Commission's Handbook for polling station staff](#), which detailed all forms of accepted photograph identification, was a helpful resource when carrying out checks.

Polling station staff reported only a few challenges with carrying out voter identification checks. Some polling station staff said they occasionally found it difficult to check the likeness of a photographic identification, especially for younger electors who may look very different from their old photographic identification. However, this was not a common occurrence.

"I found it difficult because we were in an area with quite a lot of students, and some of their IDs were when they were children. I know they say look at their eyes and distance between facial features, but I found that I struggled a wee bit with that. And one guy came in where he'd been putting his driver's licence, his bus pass, his senior card thing in and out of his wallet, so you couldn't see his face anymore. It had been wiped off on the card, so we had to ask him to go and get something else. He wasn't very happy, but he did come back, so that was all right."

(Polling station staff, England)

2.7.4 Impact on identifying personation

Identified cases of personation have remained relatively stable (Electoral Commission's Electoral Fraud Data). This is consistent with evidence from the Electoral Commission's Polling Staff Survey: the majority (97%) of polling station staff did not experience any suspected cases of personation on polling day. Less than 1% said they had experienced a single suspected case of personation, and a negligible number of polling station staff said they had experienced between two and five suspected cases of personation. The remaining polling station staff (2%) said they did not know. It is not possible to tell from this data alone whether this was because fraudulent voters were deterred, or because cases of fraud went undetected.

Furthermore, only a very small number (0.01%) of electors at polling stations were refused a ballot paper by the Presiding Officer and did not return (Voter Identification Monitoring Data). Refusal of ballot papers by Presiding Officers could indicate an attempt to vote fraudulently in some cases, especially if the elector does not return with an accepted identification. This is because Presiding Officers refuse ballot papers if: the photographic identification was not of good likeness; the Presiding Officer believed that the photographic identification was a forgery; or the elector failed to answer the prescribed questions

satisfactorily. Since some cases may have been genuine attempts at voting with electors' own identification, the proportion of actual cases of personation is likely to be even smaller.

In terms of public perception, 71% of voting age adults believed that the requirement to present photographic identification will be effective in preventing fraud. That said, many electors felt that voting in person was secure regardless of the requirements: 87% of voting age adults believed that voting in person is already safe from fraud, and 70% believed that not very much or no fraud at all occurs in polling stations in their nation (Public Opinion Survey 2024).

In the qualitative research, electors, electoral services teams and polling station staff alike felt that the introduction of photographic identity checks reduces opportunity for personation by making it more difficult to vote under a name that is not one's own, and makes personation attempts easier to detect. It was also commonly mentioned that the requirement would deter personation attempts. Similar sentiment was expressed across respondents from England, Scotland and Wales.

However, many added the caveat that personation was not a big problem in the first place, so the number of instances prevented in reality is likely to be small. Some polling station staff and electors felt that fraud was more likely to happen with postal voting as opposed to in polling stations.

"So, is it going to help stop fraud? Yes, it will. But it's stopping something that was actually incredibly small in the first instance."

(Polling station staff, Scotland)

Furthermore, some electors reflected that if individuals were determined to vote fraudulently then they will find a way, regardless of the requirements. For example, the requirements do not guard against fake identification documents, and some polling station staff said they doubted whether they'd be able to identify these.


Based on the qualitative interviews with police, police also felt that the voter identification requirements had improved the security and integrity of elections by reducing opportunities for personation through additional checks. However, they recognised that they didn't have any evidence or data to prove this improvement.

"Any additional checks that they put in place to make sure it's the right person casting a vote is obviously going to improve the integrity, but like we said we've got no direct experience so we couldn't comment from a practical point of view."

(Police SPOC)

Currently, there is not enough data to determine whether cases of personation have been reduced in the long term. In the future, long-term trends in the prevalence and perceptions of personation can be examined to indicate whether cases of personation have reduced: however, it will not be possible to attribute any changes solely to the introduction of the new requirements.

2.8 Claim 8: Electors remain satisfied with the process and ease of in-person voting

	Claim partially met	Voter identification had little impact on the experience of voting in person for most electors. There were mixed views on its impact on electors' confidence in the security and integrity of elections, but electors broadly felt it increases their trust.
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The evidence suggests that the claim 'electors remain satisfied with the process and ease of in-person voting' was partially met. The majority of electors who successfully voted in person felt that the voter identification requirements made very little difference to the process and ease of voting in person, and some felt the requirements increased the security of elections. Furthermore, the proportion of electors who didn't vote mainly due to the voter identification requirements was very small. However, some electors felt that the voter identification requirements introduced a barrier to voting for groups less likely to have photographic identification, which negatively impacted their perceptions of the democratic integrity of elections.

These findings highlight the importance of supporting groups of electors less likely to have photographic identification to be able to vote. Building on the recommendation made under Claim 5, future campaigns could emphasise the options available for those without accepted photographic identification (such as VACs, out-of-date identification documents and postal voting), and communicate the simple application process step-by-step upfront, to increase awareness and motivation.

2.8.1 Claim summary

For electors to remain satisfied with the process and ease of voting in person, the changes introduced by the new voter identification requirements need to have been implemented without significantly disrupting the experience of voting in person. These changes have been implemented if previous claims have been met (see claims 3, 4, 5 and 6). If these claims are sufficiently met, the voter identification theory of change model specifies that several key outcomes related to elector satisfaction should occur: that voting remains accessible, electors are not deterred from voting, and electors remain satisfied with the

process of voting in person. In the longer term, this leads to an increase in trust and confidence amongst electors in the integrity of elections and democratic processes.

Annex 6 sets out the elements from the voter identification theory of change that describe the pathway to change for Claim 8.

2.8.2 Elector's propensity to vote in person at the general election

For the majority of electors, the introduction of the photographic identification requirements had no impact on desire to vote in person. Four-fifths (80%) of voting age adults said that presenting photographic identification when voting made no difference to their likelihood to want to vote in person (Public Opinion Survey 2024).

In addition, 87% of polling station staff said they did not experience electors deciding not to vote because they didn't want to comply with the voter identification requirements (Electoral Commission's Polling Staff Survey). In qualitative interviews with police, police reported that they had very few problems with electors complaining or protesting about the requirements.

However, in the qualitative research with polling station staff, some recalled instances of electors purposely turning up to polling stations without photographic identification in protest of the requirements. These instances were rare, and there was evidence that many electors who protested still ended up voting.

"I definitely had, like, that angst in me where I was, like, 'I don't agree with the measures', it could be like a protest thing. But then at the end of the day they're not going to know that I purposely specifically didn't go out there because I don't agree with the voter ID thing, so I just firmed it, and I did it [voted] even though I don't really agree with that."

(Elector, voted in person)

A small minority (8%) of voting age adults said that having to present photographic identification made them less likely to want to vote in person. Groups of voting age adults that were more likely to say this tended to be groups associated with lower socio-economic status, disabled adults, ethnic minorities and younger adults (Public Opinion Survey 2024). Around two-fifths (42%) of a small subgroup of voting age adults without photographic identification also said they were less likely to vote in person, due to the requirement to show photographic identification.

Two-fifths (40%) of electors did not vote in the July 2024 General Election ([The Electoral Commission Report on the 2024 UK Parliamentary general election and the May 2024 elections](#)). According to the Public Opinion Survey 2024, only a small proportion (3%) of

non-voters said that they didn't vote because of something related to the need to show photographic identification. This was made up of 2% of non-voters who did not have photographic identification so did not vote, and 1% of non-voters who did not vote for a handful of other reasons to do with the requirement: such as not agreeing or feeling uncomfortable with the requirement, saying their photographic identification was rejected, or not being able to find their photographic identification. There were some groups of non-voters who were more likely to say that their reason for not voting was related to the requirements: these included those aged 45-54 (8%) or 55-64 (6%), social renters (8%), those living in the most deprived areas (7%), who have a disability impacting their ability to vote in person (11%) or that limits their activities a lot (12%) and those who say they only sometimes vote in general elections (7%). Non-voters without identification documents (28%) were also more likely to cite reasons relating to the photographic identification requirements as their main barrier to voting (Public Opinion Survey 2024).

There were very few cases of electors not being able to vote because they were turned away from the polling station for not having an accepted identification. Fewer than one in 1000 (0.08%) electors who attempted to vote in polling stations were turned away, did not return, and therefore did not vote (Voter Identification Monitoring Data).

Qualitative research with electors who did not vote also indicated that the voter identification requirements contributed towards some electors not voting, even if their main reason was due to their views on candidates and democracy: some electors without photographic identification said that they would have voted if the requirement hadn't been in place, but they felt unmotivated to acquire an identification document because none of the candidates reflected their views, or they felt their vote wouldn't be meaningful. Therefore, for electors who already felt less engaged with voting due to their perceptions of democracy and candidates, they may have lacked the motivation required to take the extra step towards obtaining an identification document to be able to vote.

“So, to be clear, if it weren't for the photo ID, I would have gone and voted even though I didn't believe that my vote would have any effect. But because of the photo ID, I didn't feel it was worth fully all the stress and expense and so on of getting photo ID when my vote didn't matter.”

(Elector, didn't vote because they didn't have ID)

Some other reasons for not voting related to the voter identification requirements were also mentioned in the qualitative research. These included not having an identification document that matched their current name, not being aware that out-of-date passports were accepted if they had a good likeness, and disagreeing with the requirement. (To note, the voter identification requirements do permit documents with the wrong name to be

used, so long as the elector can provide evidence to explain the discrepancy, such as a marriage certificate).

2.8.3 Ease of in-person voting

For the majority of electors who voted in person, the voter identification requirements had little to no impact on the voting experience. Nearly all (97%) of electors who voted in person said they found it easy to vote in person. Furthermore, three-quarters (76%) of electors who voted in person said presenting their photographic identification made no difference to the ease of voting, and only 6% of those who voted in person reported feeling uncomfortable about showing their photographic identification (Public Opinion Survey 2024).

This sentiment was reflected in the qualitative research with electors who successfully voted in person, with many reporting that their voting experience was no different from any other election, apart from the need to briefly show their photographic identification. This was consistent across research with electors in England, Scotland and Wales.

Only 2% of those who voted in person reported either forgetting their identification or being turned away and later returning to vote with their identification. This was slightly more common amongst younger voters (4% of those aged 18-34 and 35-44) and ethnic minorities (7%) (Public Opinion Survey 2024).

In cases where electors were turned away from polling stations because they had forgotten their identification, polling station staff in the qualitative research reported that some electors expressed frustration at the inconvenience of having to go and retrieve their photographic identification and come back to vote. However, most of these electors returned with their photographic identification without further complaint.

Only 4% of those who voted in person reported long queues at polling stations, though these weren't necessarily because of the additional identity checks (Public Opinion Survey 2024). In the qualitative research, some electors reported having to wait longer than usual, and attributed queues to the identity checks, but very few saw this as a significant inconvenience.

"I had to queue for about five minutes and that was because they were checking my ID. So, it was a bit annoying because previously, I've literally just popped out in a tea break, my polling station was around the corner, I've just gone in, voted and come straight out."

(Elector, voted in person, ethnic minority)

A minority (14%) of those that voted in person said that the photographic identification requirements made voting in person more difficult. Graduates (22%), those with a disability that limits their activities a lot (22%) or whose condition impacts their ability to vote in person (21%), were amongst the groups of voting age adults who voted in person who were more likely to think the requirements made voting in person more difficult. Similar groups were also more likely to have felt uncomfortable about having to show their identification to vote: these included voters aged 18-34 (10% compared to 6% of electors who voted in person), those with a disability that impacts voting in person (11%) or limits activities a lot (12%) (Public Opinion Survey 2024).

In qualitative research, some electors with learning disabilities or neurodivergence mentioned that the additional complexity of a new and unknown process caused anxiety and confusion. Polling station staff also reflected that the requirements could disproportionately impact disabled electors as it added another step to the voting process.

2.8.4 Confidence in the voting process

Electors were somewhat divided as to whether and how they felt the voter identification requirements affected their confidence in the voting process. Three-fifths (60%) of voting age adults said that the voter identification requirements made them feel more confident in the security of the elections. Just under a third (31%) said it made no difference, while only 4% said the requirements made them feel less confident. Individuals without photographic identification were more likely to say that the voter identification requirements made them less confident in the security of elections (17%) (Public Opinion Survey 2024).

In the qualitative research, elector opinions on the impact of the new requirements on confidence in the security of elections were polarised. Many expressed that there had been no change in their confidence and trust in elections, because they felt that elections were already secure, and personation was rare. However, some did feel the requirements had made elections more secure and increased their trust in the legitimacy of the ballot. Some even questioned why it hadn't always been the case that they needed to prove their identity to vote in person.

"It was all a positive thing because I felt much more secure about my vote; that it was legitimate and no one else was [voting under my name], and also that the people there were who they say they are."

(Elector, voted in person, low socio-economic status)

However, some electors said that the requirements had made them less confident in the security and integrity of voting, because they felt it would exclude those without photographic identification, and therefore negatively impact the democracy of voting.

Some electors felt that the list of accepted photographic identifications was biased towards excluding certain groups of people:

“It's just preventing people who can't easily access the ID from voting. I thought that the really telling part of that was the fact that they allowed us OAPs [Old Age Pensioners] to show our travel passes, but not students. I think I showed a travel card, and I was surprised it was accepted because it's a terribly distorted picture. But if you'd like to show your NUS [National Union of Students] card or your student travel card, it wasn't accepted.”

(Elector, registered to vote by post, older (over 65))

However, these opinions may be misguided by lack of awareness of types of photographic identification that are accepted. For example, the National Union of Students cards mentioned in the previous quote are, in fact, accepted, despite the electors' belief that they were not.

2.8.5 Satisfaction with the voting process

The majority (77%) of voting age adults were satisfied with the process of voting in elections (Public Opinion Survey 2024).

In the qualitative research with electors who successfully voted in person at the July 2024 General Election, many said that they remained satisfied with the process of voting in person, as very little had changed.

However, some electors were concerned that the requirements would create more barriers to voting where their perception was that certain groups of electors already lack motivation to vote. Some felt that the requirements were discriminatory towards groups of electors less likely to have identification, such as electors with low socio-economic status, young people, and disabled electors.

“I mean, it hasn't really had an impact on me, but then I have that access to the ID, and I'm a keen voter. But given that the, you know, so many people are not, they don't have the urge to vote, or they think, ‘there's nothing I can do to change it’ or ‘I can't be bothered,’ this is even more of a disincentive to get out and vote. And if you don't have easy access to ID, then you're, I know you can apply for a free authority to vote, but that's an extra step. And potentially it disenfranchises a lot of people.”

(Elector, registered to vote by post, older (over 65))

3 Accessibility

The aim of the accessibility measures is to improve the accessibility of polling stations for people with disabilities. The two main legislative changes introduced regarding accessibility include the following:

- A requirement to provide a wider set of equipment to support disabled electors when voting in person (the requirement is specifically to have regard to the Electoral Commission's guidance on equipment to be provided and to provide such equipment as is reasonable);
- Changes allowing a wider range of people to act in the role of companion, to assist disabled people to vote in polling stations, giving a disabled elector the choice of anyone over 18 years of age to assist them.

To support these changes, legislation required the Electoral Commission, in consultation with disability support and advocacy groups, to produce guidance for electoral services teams. The guidance, directed to Returning Officers, outlines how to comply with legislative changes, and how to ensure polling station staff are adequately prepared and equipped to support disabled electors to vote in person.

The accessibility measures were introduced for local elections and referendums in England, local elections in Northern Ireland, elections for the Northern Ireland Assembly, Police and Crime Commissioner (PCC) elections in England and Wales, Recall Petitions across the UK, and UK Parliamentary elections. Excluding by-elections and recall petitions, the July 2024 UK Parliamentary General Election was the third time these measures had been in effect in England (following the May 2023 and the May 2024 English local elections and Police and Crime Commissioner elections), the second time this measure had been in effect in Wales (following the May 2024 Welsh PCC elections), and the first time these measures had been in effect in Scotland. This evaluation aimed to understand and assess how the accessibility measures were applied in the July 2024 General Election.





The theory of change model, presented in Annex 7, Figure A.7.1 sets out the process of implementation of the accessibility measures and their intended effects. Important contextual factors that underpinned the rationale for the accessibility measures were:

- the duty under the Equality Act to make reasonable adjustments to remove disadvantages for disabled people – in this case in the context of voting at the polling station;
- previously, some disabled electors found it difficult to make their mark on their ballot paper in secret, as they are entitled to do;


- previous legislation, including restrictions on who was eligible to accompany disabled electors to assist them while voting and that polling stations were required to provide only a tactile voting device (TVD), did not go far enough.

This evaluation is designed to assess whether accessibility measures were implemented as intended, and produced the intended effects, as set out in the theory of change model. A total of four claims were identified from the model, detailing the pathways between processes and effects. The extent to which these claims had been met was then assessed, based on the available evidence. Table 3.1 presents these claims and our conclusions against each. In the subsections that follow, evidence collected to either support or challenge whether each claim has been met is presented.

Table 3.1: Overview of accessibility contribution claims and conclusions

Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 1: Local authority staff meet their requirements by law		Claim met	There is sufficient evidence to demonstrate that local authority staff were well prepared for polling day and implemented their requirements in line with the law.
Claim 2: Polling station staff meet their requirements by law		Claim met	There is sufficient evidence to demonstrate that polling station staff were well prepared for polling day and implemented their requirements in line with the law.
Claim 3: Communications effectively raise awareness of reform amongst electors with a disability and their carers		Claim not met	There is consistent evidence, across a variety of sources, that confirms awareness among disabled electors of the new measures was relatively low.
Claim 4: Disabled electors are enabled to vote in person as a result of the new measures		Claim partially met	There is evidence to suggest that disabled electors are able to vote in person and find it relatively easy. However, there is limited evidence to confirm this was due to the new measures.

3.1 Claim 1: Local authority staff meet their requirements by law

	Claim met	There is sufficient evidence to demonstrate that local authority staff were well prepared for polling day and implemented their requirements in line with the law.
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Evidence was compelling and consistent from both electoral services teams and polling station staff that ‘local authority staff met their requirements by law’, engaged with the Electoral Commission’s guidance for accessibility measures and implemented these measures effectively. In the majority of cases, the equipment suggested in the guidance was available for electors at polling stations. It was common for staff to have engaged with local groups supporting or related to disabled electors, to understand how they could ensure polling stations met the needs of disabled electors. However, some teams suggested this was an area they could explore further. Time constraints were given as one reason for why community groups were not always consulted.

3.1.1 Claim summary

Claim 1 aims to assess the degree to which local authority staff fulfilled their roles in relation to the new accessibility requirements. Local authority staff are responsible for the implementation of the measures, including making equipment available. For this claim to be met, local authority staff must have engaged with the guidance produced by the Electoral Commission and taken practical steps to ensure the new accessibility measures were in place.

Annex 7 sets out the elements from the accessibility theory of change model that describe the pathway to change for Claim 1. If these practical steps are met, the assumption is that local authority staff can offer support to disabled electors and feel confident doing so, and that the process of voting meets the requirements of the Equality Act by ensuring reasonable adjustments for disabled electors.

3.1.2 Enablers to implementation

Nearly all (93%) electoral administrators felt they were very or fairly prepared in terms of the overall implementation of the requirements (Post-General Election Survey of Electoral Administrators). The Electoral Office for Northern Ireland (EONI) also reported they felt fairly prepared implementing the accessibility requirements in terms of overall implementation, staffing, training and managing new processes or managing change (EONI Post-General Election Survey of Electoral Administrators).

When asked to select the three top enablers for implementing the accessibility requirements, electoral administrators in Great Britain gave the top enabler as the Electoral Commission’s guidance (79%) (Post-General Election Survey of Electoral Administrators). In qualitative interviews, most electoral services teams described the

Electoral Commission's guidance as clear and easy to apply. However, a couple of electoral services teams felt the guidance was too vague and could lead to there being inconsistencies in how each local authority implements the requirements. Another electoral services team felt the lack of explicit rules meant it was hard to establish what level of implementation was 'good enough'.

However, the guidance is intended to allow local authorities the flexibility to implement the measures in a way that best meets local needs. Other electoral services teams thought the flexibility the guidance offered was necessary to allow them to keep their investment in accessibility equipment proportionate, since it was not guaranteed that a disabled elector would turn-up at the polling station. For example, some explained that implementing hearing loops in every polling station would be costly and only be used by very few people. These teams gave examples of alternative ways they addressed the need for hearing loops. This included having hearing loops available that could be set-up in specific polling stations if an elector requested one ahead of polling day, or utilising polling stations that already had them installed.

"We did have measures in place, but if somebody did contact us, we had certain equipment on standby that we couldn't afford to have one of, in every station. But in case some electors wanted it, things like a hearing loop [...] if the building didn't have one, we had those on standby ready...we planned as much as possible to have as much as possible available in case it was needed."

(Electoral Services Manager, England)

A total of £2.1 million was spent to meet this requirement: £1.7 million was spent on new accessibility devices and accessibility devices for the visually impaired, and an additional £0.4 million spent on associated administrative costs and polling station staff training (MHCLG Economic Evaluation Data).

To help guide their decisions about what equipment they needed to make available, electoral services teams referenced how useful it was for electors to request specific equipment in advance. A few participants said they decided to only provide the equipment they deemed to be the most essential. One reason given for this was to avoid overburdening staff who would need to learn how to use, and also set-up, lots of different pieces of equipment. Another reason, suggested by one respondent, was to avoid distracting other electors from voting due to their being lots of additions to the voting space.

"It's always about what is proportionate because you don't know if a person with disabilities is going to turn up, and then you've got to manage the facilities for them"

and also for the other 1200 people that are coming in and how do you manage that on the day and all their facilities to help them vote?”

(Electoral Services Manager, Scotland)

The other two important enablers electoral administrators in Great Britain selected in the Post-General Election Survey of Electoral Administrators were Association of Electoral Administrators (AEA) training (62%) and AEA support (52%), both of which were also referenced by EONI. In terms of training, 94% of electoral administrators in Great Britain felt very or fairly prepared when it came to the training they had received for the implementation of the accessibility provisions (Post-General Election Survey of Electoral Administrators). EONI also identified New Burdens funding via MHCLG as an enabler.

A further important enabler for electoral services teams identified during qualitative interviews was previous investment in the accessibility of polling stations. It was common for electoral services teams to have already obtained the equipment suggested in the Electoral Commission’s guidance. Often, they had acquired this equipment a number of years ago, even prior to the Elections Act 2022. The reason given for this previous work was that accessibility was a high priority for them in general.

“It’s been front and centre of our approach as an election administration team, to ensure our access. I don’t think it’s a response purely to the legislation. I think we’ve been doing this sort of stuff for some time in this area.”

(Returning Officer, Wales)

“I feel like we’ve always done a pretty good job on accessibility. So, the new requirements didn’t really impact on us tremendously.”

(Electoral Services Manager, England)

Some electoral services teams mentioned that they had consulted with local community groups, ahead of the election, on accessibility requirements. Examples of how this was conducted included writing out to local groups, engaging with an internal disability network and engaging local stakeholder groups, working groups or charities. Some teams also referenced responding to general feedback they had received from electors following previous elections. Some electoral services teams suggested that requests made from these groups were for equipment that was already present at the polling stations. One participant said they made the opening in the ballot box more obvious for visually impaired electors by outlining it in yellow tape.

Other electoral services teams mentioned that they had reached out to local networks but received no response. Those electoral services teams who had not engaged with local networks mentioned wanting to do more community consultation in the future.

“We followed pretty much the guidance, pretty much to the T. And again, with additional things from feedback received from the access group. One of the things was for visually impaired people. I know we have now the larger magnifying glass... but where we went a step further in the feedback, we received from the group was on the ballot box... we’ve always had a white tape around [the slit in the ballot box] to make it more visible. Well, we found out from the access group that actually the colour yellow is better and more visible for visually impaired people. So, we changed that last year. So, we’ve worked in unison with our access group.”

(Electoral Services Manager, England)

3.1.3 Barriers to Implementation

Time constraints were a primary concern for electoral services teams in Great Britain and EONI regarding the successful implementation of the accessibility requirements. When asked to select their top three concerns, electoral administrators in Great Britain most commonly selected: timing of the General Election (40%); time constraints (overall) (36%); and pressures of other concurrent elections work (29%) (Post-General Election Survey of Electoral Administrators).

In qualitative interviews, electoral services teams explained how time constraints created by the sudden announcement of the General Election meant they had limited time available to consult local community groups to understand local needs, and also to action any requests for accessibility resources. For example, one team explained how they did not have enough time to implement a QR code with an audio recording of the ballot at the General Election, something they were able to offer at the Police and Crime Commissioner election in May 2024.

Local authority and polling station staff highlighted another significant challenge, which was the accessibility of polling station venues themselves. The physical accessibility of polling station venues sits outside of the Elections Act 2022. However, existing legislation requires Returning Officers to ensure polling station venues are accessible as far as reasonably and practically possible. The accessibility of polling station venues also had an impact on the ability to deliver the new measures. During the survey, electoral administrators in Great Britain mentioned a lack of options when choosing polling stations as a concern, which they believed may have impacted their ability to implement Elections Act requirements relating to accessibility (Post-General Election Survey of Electoral Administrators).

In qualitative interviews, polling station staff mentioned specific issues with the design of polling stations, including small and cramped spaces, heavy doors, doors that could not be propped open, lack of disabled parking and lack of outside lighting.

“There’s a trade off when you look at accessibility. Not every polling station is perfect, and you’ve got to accept that...there are some that are effectively village huts as opposed to halls. And we do the best we can and to an extent, what you’re doing is you’re providing it for the majority, and we advise our Presiding Officers to help out however they can, over and above the accessibility measures.”

(Electoral Services Manager, England)

Finally, there was some impact on workloads due to the new accessibility measures. Around one in ten (11%) electoral administrators in Great Britain said that the accessibility requirements required them to deploy more staff. Around two-thirds (65%) said there was a large or moderate increase in workload as a result of implementing these (Post-General Election Survey of Electoral Administrators). EONI reported that the accessibility requirements had caused them to deploy more staff and there had been a moderate increase in workload. Qualitative interviews suggested that the main contributors to this increase in workload were: setting up more equipment on the day and additional training to ensure polling station staff could use all the equipment. It is important to note that an increase in workload, as a result of the new accessibility requirements, was expected. Overall, 93% of electoral administrators felt very or fairly prepared in terms of staffing levels in relation to the measures (Post-General Election Survey of Electoral Administrators).

3.1.4 Delivery


Around two-thirds (67%) of electoral administrators in Great Britain said the implementation of the accessibility requirements was very good or good. A further quarter (26%) said it was satisfactory, as did EONI (Post-General Election Survey of Electoral Administrators).

Most of the accessibility provisions that electoral services teams should provide under the new legislation were reported as being made available. At least four-fifths of electoral administrators in Great Britain provided the following seven resources: tactile voting devices (89%), magnifiers (89%), polling booths at wheelchair level (88%), pencil grips (87%), chairs or seating (86%), badges identifying polling station staff (86%) and ramps for buildings with steps (80%). On the other hand, less than half of electoral administrators reported having the following resources: information available in easy read format (42%), temporary alerters or doorbells for any doors that are required to be shut during the day

(18% - note this would not be necessary for every polling station), audio devices (8%), and hearing induction loops (7%) (Postal-General Election Survey of Electoral Administrators).

EONI reported that the following equipment was requested for the July 2024 General Election and that all these accessibility provisions were available at all polling stations: chairs or seating, magnifiers, tactile voting devices, polling booths at wheelchair level, pencil grips, ramps (for buildings with steps), appropriate lighting, parking spaces reserved for disabled electors (where parking is available at the venue), information available in easy read format and information available in large print formats (EONI Post-General Election Survey of Electoral Administrators). Badges identifying staff were not requested but were also available.

3.2 Claim 2: Polling station staff meet their requirements by law

	Claim met	There is sufficient evidence to demonstrate that polling station staff were well prepared for polling day and implemented their requirements in line with the law.
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Evidence is clear from polling station staff and electoral services teams that the claim 'polling station staff meet their requirements by law' was met. Polling station staff undertook extensive training on accessibility. As a result, polling station staff reported feeling confident supporting electors with a range of needs. This included providing examples of instances when they were able to ensure a disabled elector was able to vote in person.

There were some examples from qualitative research with disabled electors of when their needs were not fully met by polling station staff, however these were not exclusively related to the new measures. Polling station staff were sometimes uncertain as to how the new measures differed from what they provided for disabled electors previously.

There could also be additional training given on how to use a tactile voting device (where used) as this was a piece of equipment that some polling station staff were slightly less confident in using. It is worth noting that tactile voting devices were mandatory equipment before the new measures were introduced. Additional areas outside the new measures may also require further attention in the training, such as more training on how to support electors emotionally (for example, if they are feeling anxious), as well as practically with the equipment available.

3.2.1 Claim summary

This claim examined the degree to which polling station staff fulfilled their roles in relation introducing the new accessibility measures in polling stations.

For this claim to be met, polling station staff must have been sufficiently prepared to follow the relevant guidance and effectively serve the needs of disabled electors. This claim assessed whether polling station staff were sufficiently trained, understood the training and new guidance and felt confident applying the new requirements and offering support to disabled electors.

While the Electoral Commission's guidance also covers the accessibility of the polling place (for example, reserved disabled parking spaces, ramps, temporary alerters for doors which provide a way for electors to let polling station staff know that they need assistance to open the door), the Elections Act 2022 is specifically concerned with equipment inside polling stations to support disabled electors to vote in person, and companion voting. Findings relating to the accessibility of polling stations are considered in this evaluation, but do not contribute to the validity of this claim as they are not covered by the Act.

Annex 7 sets out the elements from the accessibility theory of change model that describe the pathway to change for Claim 2. If these practical steps are met, the assumption is that polling station staff can offer support to disabled electors and feel confident doing so and the process of voting meets the requirements of the Equality Act by ensuring reasonable adjustments for disabled electors.

A sum of £0.1 million was provided for Electoral Registration Officers' training, this was to be spent on training for polling station staff to help them meet their requirements and understand the new measures (MHCLG Economic Evaluation Data).

3.2.2 Preparedness for implementation

Providing effective training for polling station staff was crucial to delivering the new accessibility measures. The vast majority of polling station staff in Great Britain (93%) agreed that they were well trained to support voters who needed additional assistance (Electoral Commission's Polling Staff Survey). In qualitative discussions, polling station staff echoed this view of effective training. They described the training as comprehensive and said that it made them feel confident in their ability to provide the necessary assistance. Examples of areas the training covered included the type of equipment available and how to use it, how to assist electors with specific accessibility needs and awareness that not all disabilities are visible. Some staff said the training specifically covered what the new accessibility measures were, however, other staff said that, since they receive accessibility training every year, they were not sure exactly what elements of the training were new this time.

“We all had the prior knowledge from the training of what was available. So, it was about our confidence in being able to suggest things and...just making sure that we were really clear with people what was available if needed. So, certainly the training helps build confidence to be aware of what was available on the day.”

(Polling station staff, England)

“The training was very good. They really emphasised the changes for both ID and disability inclusion.”

(Polling station staff, Scotland)

Electoral services teams also felt that polling station staff were well prepared to meet their requirements. Nearly all (97%) electoral administrators in Great Britain said that relevant staff received training. Just under two-thirds (64%) said the training was extremely or very effective; a further 30% said it was somewhat effective (Post-General Election Survey of Electoral Administrators). In qualitative interviews, some electoral services teams explained that staff were not only trained on accessibility as part of the general training they received to prepare for their roles, but also through dedicated sessions. The different methods used to deliver the training included online training (including videos), virtual meetings, in person training and via the [Electoral Commission's Handbook for polling station staff](#).

“Staff had standardised accessibility training. We try and have a consistent approach in terms of the support we offer and then we experimented with a range of additional materials for this.”

(Electoral Services Manager, Wales)

A small number of electoral services teams interviewed raised challenges with training polling station staff. One challenge was the diversity of disabilities and accessibility needs that polling station staff need to be familiar with. This breadth of needs, coupled with limited time available to train staff, meant some electoral services teams found it difficult to ensure polling station staff were confident supporting all electors.

Video training on different accessibility needs was seen as one solution to this issue, as was holding dedicated accessibility training sessions.

One electoral services team highlighted that they had to spend more time than they expected on the part of the training concerning companion voting. They said polling station staff were generally unfamiliar with this scenario as it was rarely encountered. It is worth highlighting that companion voting was not a new provision introduced as part of the new

accessibility measures, but rather the range of who can act as a companion was expanded.

3.2.3 Delivery

Survey findings suggested that polling station staff in Great Britain were confident assisting voters with a range of accessibility needs. The vast majority of polling station staff agreed they were confident assisting voters who are: physically disabled or have mobility issues (97%); blind, partially sighted or have sight loss (94%); have a learning disability (91%); are deaf, hard of hearing or have hearing loss (90%); or needed to vote using a tactile voting device (87%) (Electoral Commission's Polling Staff Survey).

In qualitative interviews, polling station staff provided a range of examples of when they had successfully supported disabled electors to vote. One example shared by multiple polling station staff was taking ballot papers or voting booths outside so electors who could not access the venue could vote. One staff member said they set-up a hearing loop when an elector arrived at the station who required it. Another staff member gave the example of providing a magnifying glass and light to an elector with a vision impairment.

Some polling station staff also suggested they were confident in their ability to ensure the companion measure was used appropriately. In one example, a polling station staff member had to intervene when they felt an elector's companion was trying to influence them to vote for a specific candidate while they were assisting them in the booth.

Polling station staff did not suggest that their workload had increased due to the new accessibility measures. However, some did express frustration at the form they had to fill in to support electors with a companion voter. Although this form was not a new requirement, the expansion of the range of people who can act as a companion may have led to an increase in the number of people voting with a companion and refreshed awareness of the need to complete the form. One polling station staff member said it almost put them off "going the extra mile" given the burden of paperwork this required.

"As a Presiding Officer, I tend to be as flexible as I can within the rules. So, as I mentioned, taking the polling booth out to them, which is within the rules. It's just being as helpful as you can, to make sure that everybody gets to vote really."

(Polling station staff, England)

Around a third (34%) of disabled electors in Great Britain agreed staff at polling stations were properly trained to assist them in voting; only 5% disagreed (Public Opinion Survey 2024). However, this statement does not exclusively relate to the new accessibility measures (i.e. accessibility provisions in polling stations and widening the companion option), but concerns any kind of assistance.

In qualitative discussions, some electors described general positive experiences with polling station staff. For example, one elector said that polling station staff provided support to their mother who had a mobility impairment. Another elector, who acted as a companion for their husband, generally described the polling station staff as “helpful and friendly”.

However, other disabled electors gave examples of when they did not receive the support required. One elector said their friend was not allowed to bring their assistance dog into the polling station.


Another elector mentioned that they felt they were treated too differently by the polling station staff due to their accessibility needs. They said the staff kept checking if they understood what they were doing, which made the elector feel uncomfortable.

Relatedly, one elector, who had anxiety, did not feel the polling station staff were able to provide adequate emotional support to them. The support they required was to calm them down after they became distressed following a negative experience with a teller outside the polling station. Another elector made a general comment that the polling station staff they encountered did not seem compassionate to elector needs.

“Perhaps it's down to training but they don't even know how to calm down a person and that's just normal sympathy - anybody can calm down a person.”

(Elector, mobility impairment)

3.3 Claim 3: Communications effectively raise awareness of reform amongst electors with disabilities and their carers

	Claim not met	There is consistent evidence, across a variety of sources, that confirms awareness among disabled electors of the new measures was relatively low.
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Despite electoral services teams feeling confident in the work they had done to raise awareness of the new accessibility measures, elector awareness was relatively low. The main method used to raise awareness was communicating with local groups, in line with the guidance. However, it seems that more could be done in relation to electoral services teams' engagement with local community groups and disability organisations as, during qualitative interviews, disabled electors suggested these as a main source of awareness. It could also be worth considering implementing a national communications campaign to ensure that electors who need to be, are aware of the support provisions that could be available to help them vote in person.

3.3.1 Claim summary

Claim 3 aims to assess whether awareness of the new measures has been achieved among disabled electors and their carers. The successful delivery of the accessibility measures relies on disabled electors being aware of the new accessibility provisions. The claim pathway outlines that, to achieve this, local authorities, together with the Electoral Commission and in consultation with disability charities, raise awareness among disabled electors through communications and direct engagement. As a result, disabled electors will be supported to vote in person if they choose and be more satisfied with and confident about voting in person.

MHCLG did not provide any specific funding for accessibility communications, however some local authorities may have used some of the grant funding for elector communication activities (outlined in section 2.3.1) for accessibility communications as this funding was not ringfenced.

Annex 7 sets out the elements from the accessibility theory of change model that describe this pathway to change for Claim 3.

3.3.2 Communications delivery

Electoral services teams had a positive view of elector awareness of the new measures. A majority (86%) of electoral administrators in Great Britain were fairly or very confident in the effectiveness of the work their teams had done to raise awareness of the changes and

what support is now available, and how electors can request the support or equipment they need (Post-General Election Survey of Electoral Administrators). In qualitative interviews, some electoral services teams suggested relevant electors would have good awareness of accessibility measures due to their experience of voting at previous elections.

Other electoral services teams felt they could do more to raise awareness about the measures in place to ensure the accessibility of elections. Some felt that more national level activity was necessary to raise awareness, to ensure that electors are aware of all the support available to them.

“One thing I would say about the accessibility stuff is I suppose there's probably still a lack of awareness with the disabled population about what Returning Officers are doing. I think it's still fairly new and...I think there's still quite a lot of work to be done, which is the engagement...raising the awareness, giving people that opportunity to request things.”

(Head of Electoral Services, England)

Half (50%) of electoral administrators in Great Britain said that before the July 2024 General Election, they engaged with disabled electors or groups representing them to explain the new possibilities open to them under the Elections Act 2022 (Post-General Election Survey of Electoral Administrators). EONI also reported having done this.

During qualitative interviews, the most common means by which electoral services teams said they had communicated around accessibility was via local community groups. These teams typically said they had shared what equipment, and support would be available to assist electors to vote. Some also mentioned reminding groups about the changes to widening companion voting.

Common reasons electoral administrators gave for why this activity did not occur in the run up to the July 2024 General Election included not having enough time to engage with disabled electors or groups representing them (noting the unexpected timing of the ‘snap’ election), or that they had already engaged with groups outside of the election timetable. Other reasons included not hearing back from disabled electors or groups representing them, difficulty in identifying who to engage with, and a lack of capacity or resource.

Other awareness-raising activities were limited. Some electoral services teams mentioned raising awareness on social media or via email. Teams also referenced making accessibility information available on their website for people who specifically looked for it.

However, other electoral services teams did not carry out any additional awareness raising activities and time constraints were again given as a significant reason for this.

“This is where it's difficult with general elections - you have a very truncated period. With local elections we have longer so we do more of the engagement work so...I think that's the difference. We would do more engagement if we had more time, but if you're on the, you know, the sort of five-week turnaround, you're having to do it really quickly.”

(Deputy Returning Officer, England)

3.3.3 Impact

Overall, there was limited awareness among disabled electors about the accessibility measures and particularly the new changes. In July 2024, just under a quarter (23%) of disabled voting age adults in Great Britain were aware of the ability to vote with a companion (this was slightly higher than for the adult population in general at 19%). This rose to 29% among those whose disability impacts their ability to vote in person. Awareness was also slightly higher than average among those who have a disabled person within their household, as 23% said they were well aware of the policy (Public Opinion Survey 2024).

In Great Britain, 14% of voting age adults reported having heard a great deal or fair amount about the requirement for a wider range of equipment to be provided to support disabled people when voting in person. The same proportion reported this for the new measure widening the options for who can act as a companion to a disabled elector. This was only slightly higher among those with a disability impacting their ability to vote in person in Great Britain, with 19% reporting being aware of both policy changes. Among voting age adults living with a disabled household member, 13% were aware of both changes (Public Opinion Survey 2024).

The most common source of awareness was word of mouth; around one in five (22% for the accessibility provisions measure and 21% for widening the companion option) cited this as their source. Only 14% said they heard about the change to accessibility provisions through local council communications, and 16% said this for widening the companion voting option (Public Opinion Survey 2024).

In Northern Ireland, 17% of all voting age adults reported knowing a ‘fair amount’ or ‘great deal’ about both measures. Awareness levels for both measures were not substantially different among those with a disability. Sources of awareness were similar to those reported in Great Britain, with the most common source cited being word of mouth (Public Opinion Survey 2024).

In qualitative interviews, disabled electors demonstrated mixed awareness about the new changes: some were not aware at all, others were aware there had been changes but not what these were in detail, and a small number were aware of the specifics of the new measures.

Among those who were aware that a change had been made, the most common source was given as disability organisations. This awareness usually came via direct communications from these groups or through their posts on social media.

“I was aware. I got the information from a program known as Disabled People Voice Limited and they sent a leaflet.”

(Elector, mobility impairment)


“A lot of what I know, I think is because I've gone looking for it and I'm kind of interested in that kind of thing, rather than it coming to me.”

(Elector, vision impairment)

“[Became aware] through disability Twitter... like Disability Rights UK or something like that; either them or somebody sharing something from them...I don't remember seeing anything directly from the Electoral Commission or anything like that...just news articles shared from disability organisations.”

(Elector, mobility impairment and neurodiverse)

3.4 Claim 4: Disabled electors are enabled to vote in person as a result of the new measures

	<p>Claim partially met</p>	<p>There is evidence to suggest that disabled electors are able to vote in person and find it relatively easy. However, there is limited evidence to confirm this was due to the new measures.</p>
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The majority of disabled electors reported finding it easy to vote in person. It was also extremely rare for electoral services teams and polling station staff to report incidents where disabled electors were unable to vote in person. However, it is difficult to determine the extent to which the new measures have contributed to these positive findings. Additionally, only around half of disabled adults of voting age agreed that they had the materials and support they needed in order to vote, and qualitative examples illustrated potential areas for improvement. These experiences could be considered to inform additional measures in future, such as ensuring polling station staff are equipped to

provide emotional as well as practical support and revisiting the accessibility of polling station venues themselves.

There is some evidence to suggest there was increased desire to vote in person due to the measures among a small number of electors. Particularly among electors whose disability affects them more severely, there is some indication that the new measures increase the likelihood of voting in person. Improving awareness of the new measures could therefore lead to increases in the number of disabled electors choosing to vote in person.

3.4.1 Claim summary

Claim 4 aims to assess whether disabled electors are enabled to vote due to the new measures. The main aim of the new accessibility measures is to make reasonable adjustments that will improve the accessibility of voting in person for disabled electors. The theory suggests that if the new accessibility requirements are delivered as intended then the support available for disabled electors to vote in person will improve, and disabled electors will feel more satisfied with voting in polling stations. As a result, disabled electors will have higher confidence voting in person, and the number of disabled voters casting their vote will remain unaffected.

This claim is fundamentally linked to the achievement of the earlier claims concerned with successful implementation of the accessibility measures (see Claim 1, 2, and 3 on the accessibility measures). If the evidence suggests that Claim 1, 2 or 3 have not been met, then it would not be possible to attribute improvements in the accessibility of polling stations for disabled electors to the new accessibility measures.

As such, costs relevant with this claim are those associated with Claims 1-3 and have been outlined in sections 3.1.1, 3.2.1 and 3.3.1, respectively (MHCLG Economic Evaluation Data).

Annex 7 sets out the elements in the accessibility theory of change model that describe the pathway to change for Claim 4.

3.4.2 Satisfaction with voting in person

Satisfaction with the process of voting in elections was high among disabled adults of voting age in Great Britain (77% - the same proportion as among all voting age adults). Satisfaction was slightly lower among those with a condition limiting their activities a lot (70%); and among those who said their disability prevents them from voting in person, only 59% were satisfied. Findings from Northern Ireland followed a similar pattern. Satisfaction among disabled adults of voting age was similar to the overall adult population (74% compared to 73%). But satisfaction dropped among those with a disability that impacts

their daily activities a lot (63%, although this was calculated using a low base) (Public Opinion Survey 2024).

The satisfaction scores consider the process of voting generally, rather than looking specifically at the experience of voting in person. To consider the experience of voting in person specifically, voters were asked how easy they found the process of casting a vote in person at a polling station in the July 2024 General Election. Among disabled adults of voting age in Great Britain, 96% said they found it 'fairly' or 'very' easy to cast their vote in person at the July 2024 General Election. Among those whose disability impacts their ability to vote in person, this figure was still high at 91% (Public Opinion Survey 2024).

During qualitative interviews, most polling station and local authority staff suggested that there were no instances of a disabled elector trying to vote in person and not being able to. Two electoral services teams suggested they experienced disabled electors being unable to vote in person. For example, one elector with a vision impairment was unable to vote because they were not given the option of using a tactile voting device. Another example related to a lack of wheelchair access to the polling station venue. These issues do not necessarily result from the Elections Act not being implemented correctly, but reflect broader issues facing disabled electors casting their votes.

Despite the majority of voters reporting they found it easy to cast their vote in person, evidence from the Public Opinion Survey 2024 and qualitative interviews suggests there is still room for improvement. For example, only around half of disabled adults of voting age in Great Britain agreed they received the materials and support they needed in order to vote (52% compared to 7% who disagreed). This proportion seems quite high in the context of the vast majority (93%) of disabled voters in Great Britain who voted in person stating not requesting equipment to help them to vote in person because they did not need any (the figure was 88% in Northern Ireland). Less than 0.5% said they requested equipment but did not receive it to help them. Only 3% reported that they would have requested it but were not aware they could.

In qualitative interviews, some disabled voters shared examples of when their voting experience was not altogether positive. Access issues related to mobility were commonly identified by both voters and polling station staff. The major challenge was with polling stations themselves, which were not always accessible. One of the most common challenges referenced was heavy doors that those in wheelchairs or mobility scooters struggled to open. This meant that even if ramps were present, the polling station still could not be accessed.

There were also a few examples of incidents where an elector's vote had to be handled by someone else because they could not access the ballot box. For example, one elector said

that polling station staff had to put their ballot in the box because they could not reach it. Another elector with a vision impairment experienced challenges with a tactile voting device. They were not confident that they had marked their vote in the right place using this device and felt like they had to let a polling station staff member look at their ballot paper to confirm this. It turned out they had not, and the polling station staff member offered to make it clearer on the ballot paper who they had voted for. The elector was left feeling unsure if their vote would count or not.

“It [the ballot box] was too high and I couldn't put my vote in myself, that annoyed me...[the polling station staff member] came over and tried to tilt the box and they couldn't, so just put it in for us. That annoyed me because...I should have been able to put my own vote in the box.”

(Elector, mobility impairment)

3.4.3 Behaviour change in relation to voting in person

The majority of disabled electors suggested the new measures made no difference to their desire to vote in person. In relation to the new accessibility provisions, 83% of disabled adults of voting age in Great Britain said this made no difference to their desire to vote at the July 2024 General Election. This figure was 85% in relation to the widening of the companion option (Public Opinion Survey 2024).

However, among those with a disability that prevents them from voting in person, 19% said the new accessibility provisions made them more likely to want to vote in person and 15% said the widening of the companion voting option did so (Public Opinion Survey 2024). During qualitative interviews, one disabled elector said that a leaflet they received referencing companion voting and outlining the support available at their polling station encouraged them to feel confident voting in person. One electoral services team reported that, after the May 2024 local elections, they received feedback that disabled voters cancelled their postal votes and voted in person for the July 2024 General Election.

“And actually, we had feedback from the chairman of the working access group just after the May election to say more of their disabled electors in the borough actually cancelled their postal votes and went out and voted in person because they now can.”

(Electoral Services Manager, England)

“When I got that leaflet I knew voting would be easy because I could go with someone who could help me out...plus the leaflet gave information that there would be help available at the polling station, and to just ask for help in case it's not provided. I knew I was safe, I went there feeling okay and feeling that I'll get help,

and I think that prepared me mentally to be able to ask for help, because I didn't go with someone, I just went by myself, because I knew there would be help there."

(Elector, mobility impairment)

4 Absent Voting

The Elections Act 2022 introduced a suite of measures that changed the arrangements to postal and proxy voting in UK Parliamentary elections, local elections in England, and Police and Crime Commissioner elections in England and Wales. The secondary legislation making these changes is referred to as Postal and Proxy Voting Revisions or abbreviated to PPVR, and postal vote handling and secrecy or abbreviated to PVHS.

Online Absent Voting Application (OAVA)

The Act brought in the Online Absent Vote Application system (OAVA) which meant that, from 31st October, voters in Great Britain could apply for postal or some forms of proxy vote online. Prior to this date, applications had to be made using a printed form. For elections in Northern Ireland and for devolved elections in Scotland and Wales, applications must currently still be made using the printed form.

Postal and Proxy Voting Revisions (PPVR)

The application process also changed so that voters were required to provide a National Insurance number, whether applying online or in hard copy, to mirror the existing application process for registering to vote. This is for identity checking, and if the elector cannot provide a National Insurance number, there are additional ways to verify identity.

The PPVR regulations also put limits on the validity of postal vote arrangements. Postal vote arrangements will be limited to a maximum of three years, following which the elector will need to make a new application. Transitional arrangements mean all existing postal vote arrangements set up prior to 31st October 2023 are extended to 31st January 2026, with no need for any signature refreshes in that time.

Lastly, the PPVR also put new limits on the number of electors for whom a person may act as proxy. The total number of electors for whom a person may act as a proxy will be limited to four, of which no more than two can be domestic electors. Domestic electors are those electors who are neither service voters nor overseas electors.

Postal vote handling and secrecy (PVHS)

The Elections Act 2022 brought in new measures around postal vote handling and secrecy (PVHS), to maintain and strengthen the integrity and security of absent voting in the election system. The Act brought the following changes into place:

- A new ban on political campaigners handling and handing in other people's completed postal vote packs (save for their own close relatives);
- A new limit of five postal votes, for handing in other people's postal votes at a polling station or an elections office; and,

- Extending secrecy processes that apply to voting in polling stations to also apply to voting by post.

This evaluation is designed to assess whether absent voting measures were implemented as intended, and produced the intended effects, as set out in postal voting and proxy voting theory of change models.




A total of eight claims for postal voting and six claims for proxy voting were identified from the models, detailing the key pathways between processes and effects. The extent to which these claims had been met was then assessed based on the available evidence.






The claims have been developed based on the theory of change models for absent voting, split by postal voting (Annex 8, Figure A.8a.1) and proxy voting (Annex 8, Figure A.8b.1). Key contribution claims were identified for postal and proxy voting separately due to the need to assess whether critical conditions were in place to observe impact.

Postal voting


Table 4.1 presents the claims for postal voting and conclusions made against each. In the subsections that follow, evidence collected to either support or challenge whether each claim has been met is presented.

Table 4.1: Overview of postal voting contribution claims and conclusions

Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 1: Polling station staff meet the requirements of the law		Claim met	Evidence from polling station staff and electoral services teams suggest the requirements for implementing postal voting measures were met.
Claim 2: Local authorities meet the requirements of the Law		Claim met	Evidence is consistent that local authorities met the requirements but there were concerns over the impact on workload.
Claim 3: Targeted communications raise electors' awareness of changes to postal voting		Claim not met	Evidence across multiple sources suggests general awareness of changes to postal voting was low amongst electors, including those who voted by post.

Claim 4: Targeted communications raise campaigners' awareness of changes to postal voting		Inconclusive	There is insufficient evidence that campaigners were aware of changes to postal voting. However evidence from Electoral Services Managers, Electoral Registration Officers and Returning Officers suggests campaigners were made aware of the changes.
Claim 5: Electors who are eligible and want a postal vote are able to obtain one and continue to maintain their status as a postal voter		Claim met	Evidence across sources suggests low instances of postal vote application rejection.
Claim 6: The application process for absent voting is more modern, accessible and efficient		Claim partially met	Evidence across sources suggests introduction of Online Absent Voting Application services increased ease of process for electors, but Electoral Management System and Electoral Registration Officer Portal limitations created difficulties for local authority staff.
Claim 7: Postal votes are more secure		Inconclusive	There is insufficient evidence to determine whether postal votes are more secure.
Claim 8: Electors are confident that postal voting is secure		Claim partially met	There is evidence to suggest that some electors are confident postal voting is secure, but it is difficult to determine the impact of the new measures on this.

4.1 Claim 1: Local authorities meet the requirements of the law

	Claim met	There is sufficient evidence to demonstrate that local authority staff were well prepared for polling day and implemented their requirements in line with the law.
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The evidence is sufficiently strong and consistent to conclude the claim that 'local authorities meet the requirements of the law' has been met. Electoral services teams were able to successfully verify the identity of postal voters and process the majority of applications submitted before the postal voting deadline.

While electoral services teams were confident in their preparedness to deliver the requirements, they noted some difficulties with OAVA and the identity checking process, including the functionality of systems and time taken to process applications, which created additional workload. Teams had suggested that the functionality of the Electoral Registration Officer Portal (ERO Portal) made the process time consuming. Additionally, electoral services teams sometimes had back and forth with electors to obtain accurate and correct identity verification information. Between 31st October 2023 and 19th June 2024 (postal vote deadline day) 4.3% of applications were 'not matched'. Also, a further 1.1% of applications had a status of 'insufficient data' which usually meant that the application was submitted without including a National Insurance number (Absent Voting Monitoring Data). Although back and forth with electors was only required for a small number of applications, it was felt to be very time consuming for electoral services teams.

As mentioned in Voter Identification Claim 5 (section 2.5), future work could be to improve functionality within the ERO Portal to allow electoral administrators to keep track of the status of applications and correspondence with electors. This could help streamline the process for local authorities and ensure efficiency during the busiest postal vote application periods. Although there were difficulties in processing applications ahead of the July 2024 General Election, the functionality had improved by the end of the application period and therefore should be smoother in the future.

4.1.1 Summary of Claim

Local authorities are critical to ensuring that absent voting measures are effectively implemented throughout the election process. They are required to process applications for postal votes, including applications through the new OAVA service; verify the identity of each applicant; and contact electors about reapplication, rejected applications and rejected postal votes. They also have a responsibility to ensure campaigners, polling station staff and wider council staff are engaged with the changes and new processes.

To achieve this, staff must be provided with effective guidance and training to deliver the requirements, and Electoral Services Managers must put processes in place to ensure that application, reapplication and communication of requirements are prepared for.

Annex 8 sets out the elements in the postal voting theory of change model that describe the pathway to change for Claim 2. If the steps are met, the assumption is that polling station staff, electoral administrators, and other stakeholders have greater confidence in the integrity of postal voting. On top of this, the application system should be both more modern for electors, and more secure as a result of identity verification.

4.1.2 Readiness and preparation for requirements

A total of £8.1 million was provided in grant funding to support local authorities to meet this requirement. £7.7 million was provided to cover the costs related to a potential increase in postal voters, such as processing applications, issuing notifications of outcome, and staff training and a further £0.4 million was provided retrospectively (MHCLG Economic Evaluation Data).

Data from the Post-General Election Survey of Electoral Administrators suggests that confidence about delivery, preparation for delivery and actual delivery of the requirements was high for electoral administrators in Great Britain. The EONI Post-General Election Survey of Electoral Administrators did not cover questions about OAVA as this is not available in Northern Ireland. Just over two thirds of electoral services teams in Great Britain felt that the progress in implementing OAVA measures was satisfactory or better. Overall, 85% felt prepared to deliver on OAVA measures and 75% felt confident about postal vote reapplication (Post-General Election Survey of Electoral Administrators).

One of the main enablers for this was the training that local authority staff received to deliver on the requirements: 96% of electoral administrators in Great Britain said that staff had received training on how to implement OAVA. Types of training that were frequently mentioned included direct training from MHCLG on the updated ERO Portal, training for Electoral Management Systems providers, and the Association of Electoral Administrators (AEA) training on what the new measures were. The AEA training was considered the biggest enabler of progress (by 62%) (Post-General Election Survey of Electoral Administrators).

“On the [...] absent voting measures, one of my electoral services officers and I attended and booked into all the training that was provided by the AEA, which was brilliant. They also provided guidance notes. MHCLG also provided guidance notes on the portal and [the guidance] has been really, really helpful.”

(Electoral Services Manager, England)

In the qualitative research, electoral services teams suggested that training was effective, but staff could not be fully confident in the postal vote application processing due to concerns around the ERO Portal. This meant that updates were continuing throughout the preparation and delivery period. In some cases, the ongoing updates prevented some local authorities from being fully up to speed with the guidance and fully confident about delivery. ERO Portal functionality was the third biggest concern for electoral administrators in Great Britain (30%) (Post-General Election Survey of Electoral Administrators).

“There was quite a lot of change... I think around the national system and the advice and information coming out was quite last minute. I think that did cause them [electoral services teams] some issues. But I think because of the changes, they [electoral services team] were still waiting for guidance and that was a bit of a hindrance.”

(Electoral Registration Officer, England)

Overall, 83% of electoral administrators in Great Britain felt prepared in terms of staffing to deliver on the OAVA measure; and 12% felt unprepared for this (Post-General Election Survey of Electoral Administrators). In the qualitative research, it became apparent that many electoral services teams had prepared additional staff to help process applications. These staff were often brought in internally from other council teams, such as democratic services, or contact centres. Some electoral services teams mentioned that civil servants were also brought in from HM Revenue and Customs’ surge support team, facilitated by MHCLG, to help process applications. Overall, electoral services teams felt confident in having adequate staff to meet the requirements.

“It was clearly manageable, and we [...] took on additional staff in the run up to the election, but our core team was in pretty good shape. So [there was] an increased workload as a result of needing to understand new obligations and new responsibilities, but it was managed within resources.”

(Returning Officer, Wales)

To deal with the volume of applications, some electoral services teams employed additional staff specifically to process applications, and some administrators felt having additional funding for temporary staff was an enabler (Post-General Election Survey of Electoral Administrators).

“We did have to employ somebody additional for postal votes, because we were inundated with a number of applications coming in.”

(Electoral Services Manager, England)

A total of £2.6 million was provided to local authorities to support the hiring of polling station staff. This was to help staff to cope with any potential increases to postal votes handed in on polling day (resulting from the introduction of the online service and the 3-year reapplication process) (MHCLG Economic Evaluation Data).

Additionally, the removal of the 5-yearly signature refresh resulted in a cost saving of £11.3 million (MHCLG Economic Evaluation Data).

4.1.3 Delivery of requirements

Almost three-quarters (74%) of electoral administrators in Great Britain believed that delivery of the OAVA measure was satisfactory or better for the July 2024 General Election. Only 12% found the delivery of this measure problematic. The biggest concern for these electoral administrators was the volume of applications (75%) (Post-General Election Survey of Electoral Administrators). The increase in the volume of applications could be attributed to a number of factors, including the introduction of OAVA. However, the timing of the election in July was a major factor, particularly the fact that it was held over the national school summer holidays in Scotland.

Despite this, the qualitative research suggests that electoral services teams did find some workload issues created by the new measures that were not solely related to the volume of applications. The most common reasons for additional workload outside of the volume of applications were: the need to input paper applications in the ERO Portal, issues with ERO Portal functionality, and identity verification information not matching (Post-General Election Survey of Electoral Administrators).

In Scotland and Wales, the functionality of the ERO Portal created a compounding effect as the use of the two systems, Electoral Management Systems (noting that each LA has its own Electoral Management System and there are multiple systems providers) and the ERO Portal, meant that mismatching names or National Insurance numbers would have to be manually logged by electoral administrators. An electoral administrator in Scotland felt that workload issues were compounded by the need to scan and input paper applications in a different way than was required prior to the Elections Act. The risk of human error (for example forgetting to log these, or forgetting to check for mismatches), and the need to familiarise staff with the new process of dealing with paper applications also created inefficiencies (although there was also a risk of human error under the previous process).

These issues impacted workloads for electoral services teams. The vast majority (93%) of electoral administrators in Great Britain said that the OAVA measure led to an increase in workloads (Post-General Election Survey of Electoral Administrators). While an increase in workloads was expected as a result of the new measures, the volume of applications appears to be the most important issue here. This cannot necessarily be attributed to the

OAVA provision, particularly given the summer timing of the election. Nonetheless, issues with the functionality of the ERO Portal may have compounded the situation. Ultimately, these issues meant that many electoral services teams felt their workloads were almost unmanageable, especially close to the application cut-off, and this provides important context to how electoral services teams experienced the new measures.

“It [application processing] lead to very late nights, especially in the run-up to the cut-off. I mean, specifically for the General Election, up to the cut-off and the election period. We have a small electorate. But we saw a 2,000-plus increase in postal vote applications for the general election, and we are a very small team. We had help from democratic services, but there was a massive surge.”

(Electoral Services Manager/ Returning Officer, England)

£0.4 million was provided, retrospectively, through JLB funding which included funding for scanners to improve efficiencies by allowing paper applications to be easily uploaded onto the ERO Portal (MHCLG Economic Evaluation Data).

4.1.4 Communicating postal vote rejections

There was some evidence of preparations being made by electoral services teams for postal vote rejections. At the time of conducting interviews with electoral services teams, some local authorities had started writing out to electors to inform them that their postal vote had been rejected, while others had started the process of creating mailing lists. It should be noted that writing out to electors to inform them that their postal vote had been rejected was not a new requirement under the EIP, rather that the EIP expanded the reasons for rejection to include too many postal votes not handed in correctly under the new rules.

“So we’ve got to write out to them [rejected applicant] within three months. So, we’ve already started that process for the general election. We completed it for May. They will receive a letter from us informing them that their vote was rejected and wasn’t counted and the reason why.”

(Electoral Services Manager, England)

4.1.5 Postal vote reapplication

Local authorities are required to communicate with electors when their postal vote has expired. In the qualitative interviews, it was clear that electoral services teams were aware of this measure. However, as the earliest point of renewal was still more than one year away at the point of the research, electoral services teams reported that they had yet to create any concrete plans to communicate with electors about their requirements to renew.

4.1.6 Impact of postal vote requirements


On being asked how implementing the OAVA measure impacted their workload, 79% of electoral administrators in Great Britain said it had resulted in a large increase, and 14% a moderate increase (Post-General Election Survey of Electoral Administrators). In the qualitative research, electoral services teams also reported issues with the systems used to manage application and identity verification. The ERO Portal was still in development at the time of the election and working separately across the Electoral Management Systems (noting that each LA has its own Electoral Management System and there are multiple systems providers) and ERO Portal system was difficult.

“We knew what we had to do, it was just the pressures came around. Additional, longer times [to] process applications, and [the] volume of searches.”

(Electoral Services Manager, Wales)

Some electoral services teams said that imperfect understanding amongst electors, who did not realise that they had to register to vote as well, meant that applications had to be rejected: however, it is worth noting that this issue would have existed prior to the Elections Act. This was the most common reason for application rejections (Absent Voting Monitoring Data). However, repeated applications from electors, related to the facility moving online, caused some problems. As the applications were now online, electors assumed it was an automated system and if they did not receive a confirmation quickly, they would keep applying. This created a number of duplicate applications and increased work for electoral services teams. In some cases, it meant multiple staff had started processing applications for the same elector.

4.2 Claim 2: Polling station staff meet the requirements of the law

	Claim met	There is sufficient evidence to demonstrate that polling station staff were well prepared for polling day and implemented their requirements in line with the law.
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The evidence is sufficiently strong and consistent to conclude that the claim ‘Polling station staff meet the requirements of the law’ has been met. Training and guidance was delivered to both polling station staff and electoral services teams, and confidence in delivering the postal vote handing-in limit was high. Although delivery was in line with the requirements of the law, and an increase in workloads was expected to result from the additional requirements, polling station staff and electoral services teams reported disproportionate

increases of workload. They reported this to result from low elector awareness of the requirement to complete a postal vote return form when handing-in at polling stations. This meant staff had to spend time supporting electors to submit the form, which they felt had not been anticipated. At future elections, Returning Officers could consider how staff could be supported to deliver on these requirements to avoid a significant increase in workloads.

4.2.1 Claim summary

Polling station staff are important to ensuring the measures related to PVHS set out in the Elections Act in 2022 are effectively implemented. Claim 1 assesses the readiness of polling station staff to implement the new postal voting measures. The theory of change assumes that polling station staff are provided with training and guidance to enable them to accept postal votes according to legislation, and that Returning Officers must take adequate steps in preparing for the return of postal votes ahead of polling day. This would include deploying the correct number of staff on polling day to meet any additional resource requirements, effectively training frontline staff and polling station staff to be aware of the limits, to manage any rejections, and to ensure that all eligible votes are submitted correctly. The outputs and outcomes expected from this process is that postal votes are only accepted if electors have handed in a maximum of 5 postal votes, have filled out the relevant form to be handed in with the votes, and that campaigners have not handled or handed in votes.

Annex 8 sets out the elements in the postal voting theory of change model that describe the pathway to change for Claim 1.

4.2.2 Readiness for implementation

The vast majority (90%) of electoral administrators in Great Britain were confident in implementing the postal vote handing-in limit prior to polling day (Post-General Election Survey of Electoral Administrators). Almost all polling station staff (97%) attended training ahead of the July 2024 UK Parliamentary General Election, and more than nine in ten polling station staff (92%) agreed the training was effective (Electoral Commission's Polling Staff Survey). Almost three quarters (74%) of electoral administrators in Great Britain agreed that the training was extremely or very effective in helping them meet the requirement of the law, specifically for postal vote handing-in limits (Post-General Election Survey of Electoral Administrators). A high proportion (94%) of polling station staff agreed that the training was effective in helping them understand what to do if someone hands in a postal vote at a polling station (Electoral Commission's Polling Staff Survey). This was supported by the qualitative research, where staff suggested training was effective and valuable. In the qualitative research, electoral services teams in multiple local authorities said training for polling station staff consistently included information on both postal vote handing-in limits and the campaigner ban on postal vote handling.

“We went through the form with them in our training and explained how the form needed to be complete. We gave them [polling station staff] a receptacle for accepted postal votes and a relevant receptacle for any that were rejected. So that was it, in polling stations, and that went down well in the training, and they understood it.”

(Electoral Services Manager, England)

Most electoral services teams focused on training and guidance in their preparations for the requirements. This was often a mixture of bespoke briefings to polling station staff, designed by the local authority, and the mandatory polling station staff training used across all local authorities. In the qualitative research, Returning Officers and polling station staff agreed that both forms of training covered the relevant aspects of PVHS for polling station staff. Some electoral services teams had also briefed local council staff about the new measures, in case any votes were returned to council office buildings.

“It was part of the briefing to the polling station staff, and I think it was part of the local authority training that that was mandated for use...The front of house reception staff for our offices [were trained] as well, so they were fully aware that the requirement to fill in a form if they were handed in a postal vote by hand.”

(Electoral Services Manager, England)

Although training was effective, and understanding of the measures was good, some polling station staff did have concerns around how aware electors were about the measures, and how lack of elector awareness impacted their workload. Around four in ten (42%) electoral administrators in Great Britain selected elector confusion as one of their top three concerns for PVHS ahead of the election (Post-General Election Survey of Electoral Administrators). In the qualitative research, some Electoral Services Managers and Returning Officers said there was concern amongst polling station staff prior to polling day that the new measures might result in a larger number of postal vote rejections due to lack of awareness amongst electors around PVHS, or result in frustration around the postal vote return form. The impact of the postal vote return form is covered further in section 4.1.3.

4.2.3 Delivery of postal vote handling and secrecy measures at the July 2024 General Election

In total, 334,010 postal votes (4.33% of the total returned postal votes) were handed in at a polling station or council office. Of these, a small proportion – 2,559 postal votes handed in (0.77%) – were rejected (Absent Voting Monitoring Data). Consistent with this, most

polling station staff taking part in the qualitative research reported few breaches of the PVHS measures.

According to qualitative research, some electoral services teams also used additional methods to help process postal vote returns at polling stations, to ensure the process of accepting or rejecting an application was transparent. At some polling stations, they used colour coded packets to know which ballot packs received would be accepted or rejected. The use of colour coded packets was considered a helpful tool to making the process of rejecting postal votes easier and being transparent with electors. Some polling stations also had a member of staff allocated to handle any postal votes being returned on polling day, to ensure speed of processing.

“We tried to make the process for the polling station as easy as possible. I don't know if you saw the red and the green rejected and accepted wallets. We tried to simplify the process as much as we could, to make it easier.”

(Electoral Services Manager, England)

In the qualitative research, polling station staff suggested that there was little issue with delivering the requirements and there were few instances where postal votes were rejected. Some polling stations had experienced returns over the limit of five, but the staff were confident in their process of dealing with this. In most cases, this meant asking the person handling the vote to select which of the five postal votes they would like to return. The majority (64%) of electoral administrators in Great Britain suggested that they had not experienced handing in of more than five postal votes (Post-General Election Survey of Electoral Administrators), while 23% in Great Britain, as well as EONI, suggested they had received 1-20 hand-ins that breached the new rules (EONI Post-General Election Survey of Electoral Administrators).

No polling station staff in the qualitative interviews had experienced any instances of campaigners handing in postal votes.

4.2.4 Impact of postal vote handling and secrecy measures on polling station staff

The majority of the impact of PVHS measures was on staff workload. In qualitative discussions, some polling staff and Returning Officers felt that the introduction of the postal vote return form created additional work for staff that was disproportionate to the issue that the new measures aimed to resolve. This was primarily around the paperwork required when submitting a postal vote in person.

“I just found that the amount of paperwork I had at the side table was just becoming quite claustrophobic, if that's the right word.”

(Polling station staff, England)

Prior to the election, polling station staff had been worried about low elector awareness of the need to return the form. Through the qualitative research, polling station staff suggested this had been an area of issue for electors. Though it rarely had an impact on whether the vote was returned or not, it had a negative impact on elector and polling station staff experience on polling day.


“I think the form is too complex. It is daunting for an elector to be handed that and be told if they don't fill this then they're lose their right to vote.”

(Electoral Services Manager, England)

“It was sort of confusion or annoyance. (Electorals were) mildly annoyed, like, why can't I just hand this over? People were perplexed as to why, because if time had allowed, they could have just dropped it in a postbox.”

(Polling station staff, Scotland)

4.3 Claim 3: Targeted communications raise electors' awareness of changes to postal voting

	Claim not met	Evidence across multiple sources suggests general awareness of changes to postal voting was low amongst electors, including those who voted by post.
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The evidence across multiple sources is strong in suggesting that the claim ‘targeted communications raise electors’ awareness of changes to postal voting’ has not been met. The Electoral Commission delivered a communication campaign to raise awareness about new changes to absent voting in the lead up to the July 2024 General Election: however, the evidence suggests this was not supported consistently by communication from local authorities. This resulted in low awareness of the changes around PVHS. Electors were not consciously aware of the introduction of OAVA, however, the vast majority of electors applying for postal votes did so online, indicating they were able to find and use the new application system. More widely, electors were also unaware of the upcoming requirement for reapplication, although this will not commence until January 2026, so awareness would not be expected yet.

Overall, this low conscious awareness amongst electors had no impact on postal vote applications or handing-in. Future communications could focus on ensuring that electors

who need to reapply are aware of the three-year reapplication requirement; this will be important for current postal voters.

4.3.1 Claim summary

To ensure that electors who wish to vote via post are able to obtain and return a vote under the new absent voting measures, it is important that electors are aware of the new measures. The absent voting theory of change model suggests that for this to be achieved, there must be targeted communication campaigns to ensure that existing postal voters are aware of the changes. These activities were expected to raise awareness of the changes amongst existing postal voters. The changes include the reapplication requirement, the option to apply through OAVA, the need to verify identity through the application, and the limit on the number of postal votes an elector can hand in at a polling station or local council building. However, the communication activity to support awareness on the 3-year reapplication requirement has not yet been conducted, as reapplication will not be required until 2026.

Annex 8 sets out the elements in the postal voting theory of change model that describe the pathway to change for Claim 3.

4.3.2 Communication of new postal voting changes

Ahead of the July 2024 General Election, the Electoral Commission developed and delivered a range of communications on absent voting (postal and proxy) and the changes brought in by the new measures.

The Electoral Commission spent less than £0.1 million on communications related to absent voting (postal and proxy). These were delivered through a range of channels including on the Electoral Commission's website and press releases, via social media, and by providing local authorities and civil society organisations with a range of materials which they used to raise awareness. Their communications on postal voting covered how to apply and the change to being able to apply online, deadlines for applying, changes to handing in postal votes, and the new requirement to reapply within 3 years.

The Electoral Commission's communications were supplemented by local authorities' own communications (which often used Electoral Commission materials).

Overall, electoral administrators in Great Britain were confident in the effectiveness of their communications to the electorate about changes to postal voting ahead of the July 2024 General Election. More than four fifths (83%) of electoral administrators in Great Britain were confident about the effectiveness of their communications in raising awareness about OAVA, 75% were confident about their communication of postal vote reapplications, and

90% were confident about their communication of the postal vote handing-in limit (Post-General Election Survey of Electoral Administrators).

EONI were only asked about postal vote handling measures as part of the Post-General Election Survey of Electoral Administrators. EONI confirmed that they had taken steps to communicate the postal vote handing-in limit, but selected 'not applicable' when asked how confident they were about the effectiveness of their communications, as they do not have a formal press office. Relatedly, EONI reported they thought electors were 'not at all aware' of the new measures (EONI Post-General Election Survey of Electoral Administrators).

Nearly nine in ten (88%) electoral administrators in Great Britain had taken steps to communicate the postal vote handing-in limit. Only 66% of electoral administrators in Great Britain had taken steps to communicate the postal vote reapplication requirement (Post-General Election Survey of Electoral Administrators). However, communication of this requirement may be lower because the need to renew does not begin until 31st January 2026. There was no data collected in the Post-General Election Survey of Electoral Administrators on electoral administrators' action to raise awareness around OAVA.

Through the qualitative research, it became clear that communication approaches varied between different local authorities. However, one consistent theme was that local authorities had placed more emphasis in raising awareness around the voter identification measures compared to absent voting. As a result, electoral services teams relied on adapting Electoral Commission materials or repeating communication campaigns from the May 2024 local elections to raise awareness about the new postal voting measures.

The channels that were mentioned most consistently included creating dedicated council web pages, adding additional information or banners in council emails, and adding leaflets to council letters.

"This one was kind of kept pretty much to the wider campaign, so like the social media, that sort of level of awareness. We did do some direct communication, but I would say the majority was the wider sort of campaign on social media and sharing information, using the [Electoral] Commission resources."

(Electoral Services Manager, Wales)

For handing-in limits and postal vote reapplication, many electoral services teams provided information on the back of polling cards, and within postal vote ballot packs, to remind electors of the new measures. There was evidence that some electoral services teams

had communicated these changes specifically to already-registered postal voters. They did this through emailing lists of electors who were absent voters in previous elections.

“We emailed them [existing postal voters] to say, “make sure you follow these rules, otherwise your postal vote may end up getting rejected.”

(Electoral Services Manager, England)

One Electoral Services Manager suggested they had decided not to actively promote OAVA due to concerns around the potential number of new postal voters that it may attract and the pressures that might have placed on the system, with volumes of applications already a significant concern for electoral services teams (See Claim 2).

“We made it known that it [OAVA] was available, but we didn't actively promote it because we were concerned that we could end up failing, because if it fails, it will become unworkable. The message was out there that you could apply for online, [...] but we didn't do a bespoke campaign about postal vote applications because of that reason, because we just thought it would be unmanageable.”

(Electoral Services Manager, England)

4.3.3 Elector awareness of postal voting measures

Overall awareness of changes to absent voting and postal voting was low amongst electors; this was supported by both quantitative and qualitative data. Generally, electors in the qualitative research suggested that it was rare to receive or see any information on new election measures outside of the voter identification measures. Even those who perceived themselves to be active in keeping up to date with current affairs did not recall much information around the new absent voting measures. Some electors expressed surprise that they had not seen more information publicised from news outlets or on social media.

“Ahead of the run up to the election, [...] I tend to listen to radio and [I am] quite active on social media, but I hadn't come across these new rules and guidance, so that was interesting.”

(Elector, registered to vote by post)

4.3.4 Online Absent Voting Application system (OAVA) and identity verification

Looking at awareness of the OAVA measure, only 36% of all voting age adults in Great Britain heard about the introduction of OAVA and 60% had heard not very much or nothing at all (Public Opinion Survey 2024).

Amongst recent absent voters specifically, there was slightly higher awareness, but this was still low. Just over half (51%) of recent absent voters in Great Britain had heard about OAVA and 48% had heard little or nothing at all (Public Opinion Survey 2024).

Low elector awareness was also found in the qualitative research with electors. Postal voters suggested there was limited communication about OAVA. However, this lack of awareness did not impact electors' ability to access OAVA. Many electors commented that finding the online services was very easy, and some electors expressed surprise that OAVA was a new measure and that the opportunity to apply online had not previously existed.

"I'm more surprised to hear that there's a new online system because it felt quite similar to last time [I applied]."

(Elector, registered to vote by post)

There were similar views expressed about the identity checking process and requirements brought in as part of the changes. Some electors again suggested that they did not realise this was a new measure and did not recall this being communicated. Other electors had simply assumed identity verification would be needed for postal voting, as part of the overall voter identification measures introduced for voting in person.

Most electors were prepared to provide identity verification, and some assumed that their National Insurance number would be required due to familiarity with other government portals and services.

"If you apply for passport you need to put your national insurance in, if you want your driving licence you put your national insurance number on it. So it's your UK government ID, it's one number for all purposes. In that respect, it does make some sense that that [the National Insurance number] is the information of choice."

(Elector, registered to vote by post)

4.3.5 Postal vote reapplication

Awareness of the requirement to reapply for a postal vote every three years was low, though this was expected as it will not be required until 2026. Only one in five recent absent voters (21%) had heard a great deal or fair amount about this measure. Awareness amongst voting age adults in Great Britain was only marginally lower: 16% had heard a great deal or fair amount (Public Opinion Survey 2024).

These findings were again supported by the qualitative research as most electors interviewed had not heard of the three-year reapplication timeline. For the most part,

electors suggested that needing to reapply did not create any negative impacts or influence the method by which they would intend to vote in the future. Most postal voters viewed their postal vote as a necessity, and therefore reapplication was not enough of an inconvenience to influence the method they would use to vote in future. However, as elector awareness of the measure is low, there is a risk that postal voters may lose their postal vote status if local authorities fail to communicate the need to reapply to electors individually when it is needed. As stated above, this is a priority for local authorities in future, rather than something that they should have considered here.

4.3.6 Handing-in limits

The Public Opinion Survey did not collect data around elector awareness on PVHS and specifically the handing-in limits. However, in the qualitative research, electoral services teams suggested that elector awareness of this measure was low. For the July 2024 General Election, half (50%) of electoral administrators in Great Britain said electors were not very or not at all aware of postal vote handing-in limits (Post-General Election Survey of Electoral Administrators). EONI also reported that voters were ‘not at all aware’ (EONI Post-General Election Survey of Electoral Administrators).

From the qualitative research, this particular aspect of the new measures was suggested by electoral services teams and polling station staff to be the main area of low awareness amongst electors. This was often reported to have manifested itself in electors’ surprise and frustration at the requirement to fill in a form when handing in postal votes at a polling station or council office. Despite evidence in the qualitative research suggesting that the PVHS measures were more consistently communicated by local authorities than other new postal voting measures in Great Britain, elector awareness remained low. In Northern Ireland, communication via EONI was not applicable due to no formal press office, but elector awareness was also considered low for the postal voting handing-in limit. Electoral services teams commonly communicated the PVHS measures via information included on postal vote polling cards.

“So, even though it says on the postal voting instruction form, it says in all the columns that are put out, and it says on the website and everything else, some people still turned up and sort of looked at you blankly when you asked them to fill the form in.”


(Electoral Services Manager, England)

“I think a lot of people were under the impression that they just literally walk in, hand in the envelope and leave again. Some people had no idea they had to fill the form.”

(Polling station staff, Wales)

The low level of awareness was also supported by the qualitative research with postal voters. For the most part, postal voters who were interviewed had no awareness of the limit of five postal vote packs. In some cases, this was attributed to the fact that the measure did not directly impact them as they were posting their own vote and were not handing in multiple votes.

4.4 Claim 4: Targeted communications raise campaigners' awareness of changes to postal voting

	Claim inconclusive	There is insufficient evidence that campaigners were aware of changes to postal voting. However, evidence from Electoral Services Managers, Electoral Registration Officers and Returning Officers suggests campaigners were made aware of the changes.
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There is not sufficient evidence to determine whether the claim 'targeted communication raise campaigners' awareness of changes to postal voting' was met, resulting in the claim being inconclusive. Evidence from qualitative research with electoral services teams suggests that there were consistent communication campaigns across many local authorities through a variety of different channels. However, there is no quantitative data from any source that can provide additional evidence.

4.4.1 Claim summary

Campaigners needed to be made aware that the Elections Act 2022 made it an offence for a campaigner to handle someone else's postal vote or postal vote documents, save for their own close relatives. Awareness of this is essential to upholding the integrity of the electoral system in the UK; in fact, this is a critical causal step in ensuring that the integrity of electoral system is strengthened. The theory of change outlines that communications from the Electoral Commission must raise awareness and promote the new legislation to campaigners and political parties, and that campaigners are engaged on the subject of the changes.

Annex 8 sets out the elements in the postal voting theory of change model that describe the pathway to change for Claim 4.

4.4.2 Delivery of requirements

Evidence collected in the qualitative research suggested that electoral services teams used a variety of ways to engage with political campaigners about the campaigner handling ban on postal votes. However, there is no further evidence outside of this that suggests whether or not the claim has been met.

The most cited forms of raising awareness in the qualitative research were briefing meetings, circulation of internal guidance and information packs, and Electoral Commission information.

“There’s not much we can do. We tell them not to handle votes. We briefed the candidates’ agents at a sort of briefing session and told them they couldn’t do it. We can’t stop them from doing it, but we told them not to.”

(Electoral Services Manager / Returning Officer, Scotland)


Some electoral services teams also enlisted the help of the local police Single Point of Contact (SPOC) to help disseminate the message to political parties, campaigners and agents. Every police force in the UK has a designated Single Point of Contact (SPOC) officer for electoral law. Electoral services teams consistently reported that they had also delivered briefings and provided information themselves.

The code of conduct for campaigners was also updated to include information on the ban on postal vote handling. Overall, electoral services teams suggested that the information provided to campaigners was comprehensive, and the measure was well understood in briefing meetings. They also reported that there were no instances of campaigners handing in the postal votes of others.

“There was some Electoral Commission guidance around it. Their code of conduct for campaigners, was updated to include that information and obviously we provided briefings and things for groups and for the candidates when they were nominated. We spoke to them about it as well. And I have to say that people were really very well aware of it.”

(Electoral Services Manager / Returning Officer, England)

4.5 Claim 5: Electors who are eligible and want a postal vote are able to obtain one and continue to maintain their status as a postal voter

	Claim met	Evidence across sources suggests few instances of postal vote application rejection.
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There were very few instances of postal vote application rejection, suggesting that electors were able to obtain a postal vote if they wished to. As a result, the claim ‘electors who are eligible and want a postal vote are able to obtain one and continue to maintain their

statuses as a postal voter' has been met. This is supported by the qualitative research, wherein electors suggested the introduction of OAVA has provided a more convenient way to apply for and manage their postal vote status. Although the identity verification did create some inefficiencies, primarily through the need for back and forth between electors and their local authorities, this was not believed to have resulted in many rejected applications.

Although there was low elector awareness of OAVA, and Claim 3 was not met, this did not have a significant impact on the number of postal vote applications or the number of rejections. Most rejections were due to not being registered to vote, as opposed to lack of awareness about new postal voting measures.

4.5.1 Claim summary

For electors to be able to obtain a postal vote, the application process and identity verification must be easy and efficient. Additionally, it is important that the 3-year reapplication period must not have an adverse effect on current electors holding a postal vote. Local authority staff must be sufficiently prepared to process new postal vote applications (Claim 2), and electors must not be hampered by lack of awareness around changes to absent voting (Claim 3).

The absent voting theory of change outlines that the online system, identity verification and reapplication must not impact the number of electors who want to vote by post or deter any electors. Electors must find the process more convenient as a result of the revised application process.

All the costs associated with Claim 5 have been stated under Claims 1 and 2 (sections 4.1.1 and 4.2.1)

Annex 8 sets out the elements in the postal voting theory of change model that describe the pathway to change for Claim 5.

4.5.2 Preparation for postal vote applications

Local authorities were responsible for ensuring all valid postal voting applications could be processed and verified by the application deadline, including the processing of any applications through OAVA. In terms of OAVA, 74% of electoral administrators in Great Britain said that the implementation of this requirement at the July 2024 General Election was satisfactory, good or very good (Post-General Election Survey of Electoral Administrators).

However, as stated in Claim 2, although the volume of applications did not necessarily result from the new measures, there was some concern around how the volume of

applications received impacted workloads. Around one third of electoral administrators in Great Britain (34%) did not feel prepared for the volume of applications (Post-General Election Survey of Electoral Administrators). This was supported by qualitative research, in which Electoral Services Managers suggested that they had prepared a large number of additional staff to deal with the volume of applications. While this was not specifically related to the introduction of new measures, the new requirements, for example the additional step to verify electors' identities and additional time taken to process paper applications, may have amplified these workload pressures in a small number of cases.

Despite this, there was little evidence to suggest the increased workload had an impact on electors having their application approved. Even though workloads increased, there was no evidence collected in the qualitative research that suggested this meant that any postal votes did not get processed in time for the deadline.

“The majority of our applications did end up being online, but we did have to deal with a lot of paper applications, and we did have to expand the support [for] the registration officers dealing with those. So we had to have at least two additional officers dealing with postal applications for the parliamentary election because of the extra time that it required in dealing with them.”

(Electoral Services Manager, Wales)

4.5.3 Delivery of postal vote application requirements

Most eligible electors who wished to, were able to obtain status as a postal voter for the July 2024 General Election. Since OAVA went live, there were 1,779,200 postal vote applications prior to the July 2024 General Election (3.93% of the parliamentary electorate).

Within this, there were low instances of postal vote application rejection: of these applications, 52,638 were rejected, which represents just under 3% of applications. Of those, more than a third (33.38%) were rejected as they were not registered to vote. ‘Other’ reasons (unspecified) were the second most common cause of rejection (33.15%) and identity could not be confirmed was third (22.03%) (Absent Voting Monitoring Data).

Additionally, 71% of electors who have voted by post in a recent election or report being registered to vote by post suggested that the application process was easy. Only 3% reported that this was difficult (Public Opinion Survey 2024). The ease of application for electors is covered further in section 4.6.

In the qualitative research, none of the electors reported having unsuccessfully applied for a postal vote. Those who were registered to vote by post (both new and legacy applicants), suggested they had little trouble in managing their postal voter status and in

obtaining their postal vote ballot pack. While some postal voters had issues verifying their identity or applying for their vote, ultimately this did not have an impact on making a postal voting arrangement.

Some electoral services teams reported issues with verifying identity. A common problem with applications was information, such as National Insurance number or names not matching, which resulted in back-and-forth with electors. In some cases, this led to rejected applications if electors were not responsive; however, electoral services teams suggested that instances of these situations were very infrequent. This issue may have been compounded by limitations mentioned with the Electoral Management Systems and ERO Portal systems in section 4.2.


Some other Electoral Services Managers discussed the impact that back-and-forth with electors had on postal voters in receiving their postal vote pack in time. This finding should be approached with caution as it was difficult to disaggregate this issue from other contextual factors, such as the timing of the snap election. In rare cases, a delay in verifying identity, such as when names and National Insurance numbers did not match, may have caused issues for postal voters in receiving their postal vote ballot in time for them to submit their vote. For the most part, this was attributed to the summer timing of the election and also to a lack of awareness amongst electors of when and how postal vote packs are sent out. In a few instances, Electoral Services Managers did suggest that the issue could in part be attributed to the difficulties associated with the new identity verification measures.

“If there's any small issue with post in that window and someone's going away that following weekend, it's a real struggle for them (to vote).”

(Returning Officer, England)

In most cases, however, electoral services teams and electors suggested that the introduction of OAVA would make it easier for eligible electors to apply for and obtain a postal vote. Some electoral services teams suggested that the previous physical applications were onerous for electors and may have previously deterred people who wanted a postal vote from applying.

4.6 Claim 6: The application process for absent voting is more modern, accessible and efficient

	Claim partially met	Evidence across sources suggests the introduction of the Online Absent Voting Application service made the process easier for electors, but Electoral Management Systems and Electoral Registration Officer Portal limitations created difficulties for local authority staff.
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The evidence suggests that the claim ‘the application process for absent voting is more modern, accessible and efficient’ has been partially met. The majority of absent voters felt the application process was easy, and evidence from multiple sources indicated that the process was modern, accessible and efficient for electors. However, this was not the case for the electoral services teams processing the applications. In both quantitative and qualitative evidence, most electoral administrators reported that electoral services teams saw an increase in workloads as a result of OAVA. Electoral services teams frequently noted the inefficiencies in processing applications and the identity checking process which had come about due to the revised requirements. As previously mentioned in sections 2.5 and 4.2, future work could focus on creating functionality within the ERO Portal to allow electoral administrators to keep track of the status of applications and correspondence with electors.

4.6.1 Claim summary

Changes to the way absent voters apply for their postal vote are intended to make the process more modern, efficient and accessible. Whether this claim is met is reliant on whether core elements of the previous claims have been met. If local authority staff are able to meet the requirements of the law efficiently (Claim 2), if eligible electors are easily able to obtain a postal vote if desired (Claim 5), and if the processes are smooth and reliable, then, according to the theory of change model, absent voting has been successfully modernised.

Annex 8 sets out the elements in the postal voting theory of change model that describe the pathway to change for Claim 6. If these steps are met, the assumption is that electors who want to vote by post find the process more accessible and convenient, and there is greater efficiency for the local authorities in application processing.

4.6.2 Accessibility and efficiency of the application system for electors

Quantitative findings suggest that, for electors, the applications have remained easy: 71% of electors who have voted by post in a recent election or report being registered to vote by post suggested that the application process was easy. Only 3% reported that this was difficult. Over eight in ten (84%) of those who said they applied for their postal vote online since 31 October 2023 found this process easy (Public Opinion Survey 2024). These figures support the idea that OAVA has helped modernise the application system.

For paper applications since 31 October 2023, a slightly smaller proportion (69%) found the process easy. 78% of those who had applied by post before 31 October 2023, when identity checking came into place, said they found the process easy (Public Opinion Survey 2024). This suggests the identity verification requirement may have made the process slightly more difficult. This conclusion should be approached with caution, however, as those who applied before the requirement might not accurately recall their experience in detail.

Overall, postal voters in the qualitative research supported the idea that the application process was simple and easy to do, even with the introduction of identity verification. For many postal voters, having the option to apply online was preferable, firstly for convenience to complete the application wherever and whenever they wanted, but also in creating an easy audit trail to check or confirm the status of their application.

“For me, doing something online is so much easier and I like the fact that [...] my application was confirmed really fast, I got an e-mail trail of everything. For me that’s better than sending something to the post.”

(Elector, registered to vote by post)

“I think it’s more convenient for electors, and we did have some people that were quite shocked that they could actually do something to do with the voting and registration online.”

(Electoral Services Manager / Returning Officer, England)

As previously mentioned in section 4.3, some postal voters that valued the introduction of OAVA also commented that they were surprised online applications were not available previously. They felt it had perhaps taken longer that it should have to make these available.

4.6.3 Efficiency of the application system for electoral services team

The introduction of OAVA required £0.1 million in grants, to cover staff training on the OAVA platform (MHCLG Economic Evaluation Data).

As discussed in Claim 2 and Claim 5, the main issues with the application process for electoral services teams were the difficulties with the ERO Portal’s functionality, and the impact this had on staff workload when electors’ names or National Insurance numbers could not be matched with existing records. On being asked how implementing the OAVA measures impacted their workload, 79% of electoral administrators in Great Britain said it had resulted in a large increase, and 14% a moderate increase. Three in ten (30%) of electoral services teams selected issues with ERO Portal functionality as one of their top

three concerns related to OAVA (Post-General Election Survey of Electoral Administrators).

Additionally, the qualitative research found identity verification issues caused problems with efficiency. Electoral services teams had to manually log issues, which sometimes resulted in duplication of checks. Electoral services teams suggested that rejections were not common for absent voting, but back-and-forth to obtain correct identity verification was time consuming.

“There were just so many instances where something was wrong, they [electors] weren't registered, or their registration didn't quite match.”

(Electoral Services Manager / Returning Officer, England)

“I'm sure, like other councils probably will say, we've [...] had issues with the [ERO] portal, with certain functionalities not working, or not being ready in time. But in terms of verifying... I think the issue, with those that aren't verified, where we have to write to them or contact them to ask for evidence, it's the resource that's taken.”

(Electoral Services Manager, England)

Working across multiple systems caused problems with efficiency for electoral services teams. This was supported in qualitative research with Electoral Registration Officers who suggested that the ERO Portal had many issues that needed resolving in the services' first months. Some Electoral Registration Officers felt that the introduction of multiple systems, and having multiple steps to complete an application, created too many areas where things could go wrong. For example, a paper application would have to be manually scanned into the systems, then checked for identity confirmation. If there were any issues in these steps, it would require even more time to go back to the elector and obtain updated information to help process the application.

“[We] used to do everything via the Electoral Management System. We knew exactly where we were with that, but we've now got an Electoral Registration Officer Portal, we've now got the DWP check, we've got all of these different scenarios that are all [...] different points of failure, really, that could happen on the run up to an election. So it's not solid.”

(Electoral Registration Officer, England)

Some electoral services teams compared the new system and services unfavourably to the previous system. This was raised when electoral services teams had high volumes of physical applications, as in the new system this increased the amount of time required for them to be processed. This was particularly in areas where the local electorate tended to

be relatively older, which was perceived by electoral services teams to be the main reason behind a high number of physical applications. Specifically, the scanning of physical applications using the ERO Portal was initially slower than previously for some electoral services teams. This added extra time to an already resource-intensive and inefficient process.

“Processing these postal applications, why they couldn’t leave it as they were, is beyond me. The whole process from start to finish is rubbish. It means that we probably need more manpower behind it. What the government expects is everybody’s got a smartphone, everybody should be able to go on there and do their online application. That’s a massive assumption to think that everybody is equipped to be able to do that.”

(Electoral Services Manager, England)

Problems with duplicate applications from electors, mentioned in Claim 2, also suggest that OAVA need to find a way of dealing with, or preventing duplicate applications, before they can be considered fully modernised and efficient. As the applications were online, some electors assumed it was an automated system. If they did not receive an automated confirmation quickly, they would keep applying, creating duplicate applications.

“Because people think it’s digital, what they’re doing is, they’re putting in [an application for] a postal voting form. And if it doesn’t appear in their mailbox within 20 minutes, they’re putting in another one [application], then they’re going to put in another one. And so, your numbers become compounded so much. At one point, we were sitting with 20,000 forms to process. And how many of those were duplicates?”

(Electoral Registration Officer, Scotland)

4.7 Claim 7: Postal votes are more secure

?	Claim inconclusive	There is insufficient evidence to determine whether postal votes are more secure.
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There is not enough evidence to confidently determine whether the claim ‘postal votes are more secure’ has been met or not.

Very few postal vote applications were rejected. Identity not being confirmed was given as one reason for rejections, which suggests the identity checking process has had an impact

on whether electors are allowed to vote by post or not. However, a tiny proportion of the applications were rejected on the basis of the application being fraudulent.

It is hard to assess the level of impact of the measure as it is not possible to determine the extent to which the measure may have acted as a deterrent. Additionally, only a tiny proportion of postal votes handed in at council offices or polling stations were rejected. It is again hard to determine the level of impact this measure has had. Electoral services teams were not convinced of the ability of the new measures to make postal voting more secure.

Further evidence is needed to establish whether applications rejected on the grounds of identification verification contributed to the security of elections.

4.7.1 Claim summary

Claim 7 aims to assess whether the new postal voting measures have led to postal votes becoming more secure. For this claim to be realised, it is necessary for local authorities to successfully implement the identity verification process for absent vote applications, with support from the police to enforce these requirements.

Annex 8 sets out the elements in the postal voting theory of change model that describe the pathway to change for Claim 7. This outlines how a more secure application system, a reduction in the potential for electoral fraud and enhanced of the ballot secrecy would be achieved.

4.7.2 Overall feedback on postal voting measures

Electoral services teams generally did not think that the postal voting measures had a particularly strong impact on the security of postal votes. During qualitative interviews, some electoral services teams mentioned that they did not think electoral fraud related to postal votes was a particularly significant issue prior to the changes. Therefore, they thought the impact of these changes would only ever be minimal.

In qualitative interviews with police there were mixed views about the potential impact of the new postal voting measures. Some participants thought that introducing new measures was generally a good idea, and that any new legislation or guidance can help strengthen the security of absent voting. However, others were not sure whether the measures would have any impact, suggesting they would have to see some data on impact before making a judgement.

4.7.3 Impact of identity verification requirement

Of the applications that were made for postal votes between the date the online service went live and the deadline for postal vote applications in the July 2024 General Election, 2.96% were rejected. Of these rejections, 22.03% were rejected due to identity not being

confirmed (Absent Voting Monitoring Data). This could suggest that the new requirements around identity verification have led to applications being rejected, which potentially indicates improved security for postal votes. This interpretation needs to be considered with caution though, as applications rejected on the grounds of identity not being confirmed do not necessarily suggest suspicious activity. Only 0.06% of rejected applications were rejected due to a fraudulent application. Therefore, it is difficult to determine the impact of the new postal voting measures on reducing electoral fraud in postal voting (Absent Voting Monitoring Data).

The processes associated with identification verification for postal votes cost £4.8 million in grant funding (MHCLG Economic Evaluation Data).

In the qualitative interviews, some electoral services teams did not think the identity checking process made voting any more secure. Specifically, they did not see why an applicant's identity needed to be checked again when they had already verified their identity at the register to vote stage. Additionally, some electoral services teams were concerned that the identity checking process could act as a barrier to people being able to vote due to not being able or willing to provide the necessary information. Nevertheless, a small number of participants suggested that having to go through this process again did make the system more secure.

"I don't think we had concerns anyway, but yeah clearly it does [have an impact]. You have to be fairly satisfied that things are real [i.e. applications are genuine] when you're checking NI numbers every five minutes for people. So, yeah, I guess it has had a positive effect, but coming from a place where there wasn't any particular concerns [previously]."

(Head of Electoral Services, England)

"I don't think it gives us any more confidence...I don't think that checking a person's identity, when we've already done it once, makes us feel that those applications are any more secure."

(Electoral Services Manager / Deputy Returning Officer, England)

4.7.4 Impact of handling restrictions and the online application

In the Post-General Election Survey of Electoral Administrators, electoral administrators were asked how many attempted hand-ins breached the new rules. First, they were asked if any potential breaches had occurred where someone had attempted to hand-in more than the permitted number of postal votes and was formally rejected as a result of this. Approximately 24% of electoral administrators in Great Britain had experienced this, and so had the EONI. Electoral administrators were then asked to think about potential


breaches where the postal voter learnt they had gone over the limit of postal votes to hand-in. This meant the voter had to hand in a subset of the postal votes they'd originally intended to submit. Slightly fewer (23%) had experienced this (Post-General Election Survey of Electoral Administrators). It is not possible to determine the impact of the handling of postal votes measure on postal vote security from this data.

In the qualitative interviews, electoral services teams did not suggest there had been a strong impact on security from the addition of OAVA and the restrictions on postal vote handling. Electoral services teams and polling station staff suggested examples for how fraud could still occur under the new hand-in rules. One hypothetical example shared by multiple participants was the idea that electors could still put as many postal votes as they liked into a post box. Another hypothetical example given was that electors could travel between multiple polling stations to hand-in more than five postal votes on the day.

"If you're a clever fraudster, you wouldn't be stupid enough to come into the city council and hand in the forms. You'd just put them in a letterbox. So has it stopped anything? No."

(Electoral Services Manager, England)

4.8 Claim 8: Electors are confident that postal voting is secure

	Claim partially met	There is evidence to suggest that some electors are confident postal voting is secure, but it is difficult to determine the impact of the new measures on this.
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Evidence suggests that the claim 'electors are confident that postal voting is secure' has been partially met. The majority of voting age adults in Great Britain think that postal votes are safe from fraud, although a substantial minority are not confident in the security of postal votes. The proportion confident in postal voting security is also lower than the proportion who think voting in person is safe from fraud. Electors were also not convinced that restrictions on handling of postal votes, the identity checking process and changes to PVHS had an impact on security.

The findings suggest that electors would need evidence that postal voting has been made more secure by these changes for their perceptions of security to be improved.

4.8.1 Claim summary

Claim 8 aims to assess whether electors believe that the new postal voting measures have led to them having greater confidence in the integrity and security of postal voting. The pathway to change set out in Annex 8 suggests that the new measures related to postal voting must be understood by electors and that they should lead to the public having greater confidence in the integrity and security of postal voting.

The changes to the identity checking process and secrecy processes (i.e. secrecy processes that apply to voting in polling stations now also apply to voting by post and people acting as proxy voters) relate to absent voting in general and therefore cover both postal and proxy voting. To avoid repetition, findings related to the impacts of the identity checking process and changes to the secrecy of absent votes are only covered in the postal section and not again in the proxy section (see sections 4.9 to 4.14).

4.8.2 Perceptions of how secure postal votes are

Electors are less confident that postal votes are safe from fraud than voting in person. In July 2024, only six in ten (61%) voting age adults in Great Britain said voting by post is safe from fraud (which was consistent with previous waves of the survey), while 16% said it was unsafe. This is in comparison to 87% of voting age adults who thought voting in person was safe (a finding that has remained consistent since the first wave of the Public Opinion Survey in January 2023) (Public Opinion Survey 2024). In the qualitative research, electors registered to vote by post suggested they generally liked to think that their votes were secure, but a minority did suggest that once you put the vote in a post box you did not have any control over what happens to it.

In the qualitative research, it was common for electors to suggest that they welcomed new security measures being introduced for postal voting. It was, however, rare for electors to be able to give specific reasons for why they welcomed the new measures. Instead, they said that any steps to improve security were a good thing. Electors also applied this way of thinking to the identity checking process. These electors said that the fact they had to provide so much information to confirm their identity, made them feel more confident that the process was secure.

“It was a pain in the neck to do when I voted by post. The instructions were clear, which was good, but it was a lot of steps and I felt almost comforted by all the things I had to do and all the seals that were in place...so I think my experience has proved to me that I’m happy with the way that currently the ballot is formatted and dealt with.”

(Elector, registered to vote by post)

Some electors highlighted the importance of the change to make it an offence for someone to seek information about who a postal voter is voting for (i.e. the extension of secrecy processes that apply to voting in polling stations to also apply to voting by post). They thought this was important to reduce the risk of people being coerced into voting for someone specific. However, these electors were generally sceptical about how well this could be policed, since they thought it was most likely to occur in the home or other private places.

“It would pick up criminalised coercion, which I think is a good thing. People should be able to vote in secret and vote for who they want without being convinced by somebody...[but] a rule is [only] as good as its enforcement. I think if somebody's going to coerce somebody behind closed doors, they're still going to do it, even if it's illegal. It's just now there's a way of dealing with it, but I don't know how effective it will be, in being enforced.”

(Elector, registered to vote by post)

A minority of electors raised the concern that, if someone wanted to act fraudulently, then they would find a way to get around any measures imposed. Referring to the restrictions related to postal vote handling, one elector mentioned that someone intent on acting fraudulently would simply use a post box to get around the hand-in restrictions.

“I don't know if fraud does exist. And it doesn't really make any difference whether we vote on postal, whether we go into the stations or whether it's online. If somebody wants to do something [fraudulent], they will. That's my opinion... You can mitigate lots of things, but if somebody really wants to fraud an election, they will.”







(Elector, registered to vote by post)

Proxy Voting


Table 4.2 presents the claims for proxy voting and conclusions made against each. In the subsections that follow, evidence collected to either support or challenge whether each claim has been met, is presented.

Table 4.2: Overview of proxy voting contribution claims and conclusions

Claim title	Claim met?	Claim outcome	Claim conclusion
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Claim 1: Local authorities meet the requirements of the law		Claim met	Evidence is consistent across sources that local authorities met the new requirements.
Claim 2: Targeted communications raise electors' awareness of changes to proxy voting		Claim not met	Evidence across multiple sources suggests low awareness amongst proxy voters about changes related proxy voting.
Claim 3: Electors who are eligible and want a proxy vote are able to appoint an eligible proxy		Claim met	Combination of evidence suggests low instances of proxy vote application rejection.
Claim 4: Proxy votes are more secure		Inconclusive	There is insufficient evidence to draw a confident conclusion.
Claim 5: The application process for absent voting is more modern, accessible and efficient		Claim partially met	Evidence across sources was inconsistent on whether the process of applying for a proxy vote was easy for electors. Multiple sources suggest it was inefficient for electoral services teams.
Claim 6: Electors are confident that proxy voting is secure		Inconclusive	There is insufficient evidence to draw a confident conclusion.

4.9 Claim 1: Local authorities meet their requirements of the law

	Claim met	There is sufficient evidence to demonstrate that local authority staff were well prepared for polling day and implemented their requirements in line with the law.
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Evidence across multiple sources is consistent and strong to conclude that the claim 'local authorities meet their requirements of the law' has been met. Electoral services teams were able to process the majority of applications for proxy voters successfully and before the deadline. They were also able to verify the identity of proxy voters with only a small proportion of applications being rejected. Similar to postal voting, although electoral

services teams were confident that they were able to meet the requirements of the law, the new proxy voting measures impacted their workloads. The functionality of the ERO Portal made the process time consuming and many staff often had to go back and forth with electors to obtain accurate and correct identity verification information. Similarly, the process of checking local records of proxy voters and the proxy holder to check for any exceeded limits was time consuming.

4.9.1 Claim summary

Local authorities are central to ensuring that absent voting measures are effectively implemented. Local authorities are required to process applications for proxy voters, including via the new OAVA; verify the identity of each applicant; and contact electors about reapplication in situations where nominated proxies are not eligible. Local authorities also have a responsibility to ensure that campaigners, polling station staff and wider council staff are engaged on the subject of the new changes and processes.

To achieve this, the absent voting theory of change suggests that staff must be provided with effective guidance and training to deliver the requirements and that processes must be in place to ensure that application, reapplication and communication of requirements are prepared for.

Annex 8 sets out the elements in the proxy voting theory of change model that describe the pathway to change for Claim 1.

4.9.2 Readiness and preparation for proxy requirements

As mentioned in Postal Voting Claim 2, data from the Post-General Election Survey of Electoral Administrators suggested that confidence, preparation for and delivery of the requirements was high for electoral services teams in relation to OAVA. Almost three quarters (74%) of electoral administrators in Great Britain felt that implementing OAVA measures was satisfactory or better. Overall, 85% felt prepared to deliver on OAVA measures (Post-General Election Survey of Electoral Administrators).

A total of £0.1 million was provided in grant funding to support local authorities to meet this requirement. This was to cover the costs related to a potential increase in proxy voter applications to process (MHCLG Economic Evaluation Data). Additionally, absent vote cycle changes led to a cost saving of less than £0.1m (MHCLG Economic Evaluation Data).

Additional staff were often made ready to help deal with the expected number of absent vote applications. However, in the qualitative interviews, it was suggested that the need for new staff, and the worries concerning workloads, were attributed more to the expected

number of postal vote applicants as opposed to proxy voting applicants, where numbers remained small.

For proxy voting limits, 82% of electoral administrators in Great Britain were very or fairly confident in the effectiveness of their work to raise awareness about what the public needed to do, and 70% of electoral administrators said that the training was effective. Confidence and preparedness were also very high for proxy-specific measures: 91% of electoral administrators in Great Britain said they were prepared for overall implementation of proxy measures (Post-General Election Survey of Electoral Administrators). EONI also reported feeling 'fairly prepared' for the proxy voting limit (EONI Post-General Election Survey of Electoral Administrators).

In terms of staffing, 91% of electoral administrators in Great Britain felt prepared, and in terms of training, 92% felt prepared. The Electoral Commission's guidance (82%) and AEA training (74%) were mentioned as the biggest enablers of delivery (Post-General Election Survey of Electoral Administrators). This was supported by the qualitative interviews, in which electoral services teams said they had felt confident in applying the measures.

"I think that [proxy limits] was less of a problem for us. I don't think we were anticipating too many that would go above the [proxy limit] number, so I think we were we were prepared, with [having been] given training on it, and I'm not aware of any issues coming back."

(Deputy Returning Officer, England)

4.9.3 Delivery of proxy requirements

Overall, 51% of electoral administrators in Great Britain believed that the proxy limits had increased their workloads (Post-General Election Survey of Electoral Administrators). In the qualitative interviews, electoral services teams said that this was mainly attributed to the need to manually check for proxy limits as this was not built into their Electoral Management System or the ERO Portal.

"Yeah, to be honest, again, it [proxy limits] was just an add-on, we looked, [to check], have we got a problem, but again, the software wasn't designed to tell us., The Electoral Management System wasn't designed to tell us. In reality, how do we know if somebody's done it [exceeded the limit], we need one of the softwares to tell us if we've got hundreds and hundreds of proxy votes."

(Electoral Services Manager, England)

Although the process for proxy checking could be time consuming, there was little evidence to suggest the inefficiencies stopped electoral services teams from meeting the

requirement of the law. In the qualitative interviews, electoral services teams did not suggest that the processes or workloads prevented them from processing any of the proxy applications. In one local authority, they deployed an absent voting manager to help process applications across postal and proxy voting. This was successful in helping to manage any additional workload created by proxy limits.

“We’re a big authority, we’ve got an absent voting manager within our team and, given the numbers of proxy applications that we do get being fairly low in terms of our numbers, we just kept those applications being managed by that one person. So it didn’t really affect the wider team and they were able to absorb that.”


(Electoral Services Manager / Returning Officer, England)

The top concern for electoral administrators in Great Britain around proxy limits was the processes and resources needed to check proxy limits with other local authorities (30%) (Post-General Election Survey of Electoral Administrators). According to the qualitative research, while some local electoral services teams went as far as to check whether electors had proxy lists for limits with other local authorities, this was time consuming and was not a requirement by law for local authorities.

“However, the resources required to check for other local authority areas, you know, the pressure, it’s horrendous. And we have done that, but... there’s no linking up of things. So we decided we could only do this internally.”

(Electoral Services Manager, England)

4.10 Claim 2: Targeted communications raise electors’ awareness of changes to proxy voting

	Claim not met	Evidence across multiple sources suggests low awareness amongst proxy voters about changes to proxy voting.
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The evidence across multiple sources is consistent in suggesting that the claim ‘targeted communications raise electors’ awareness of changes to proxy voting’ has not been met. There is strong evidence that the Electoral Commission delivered an extensive communication campaign to raise awareness about new changes to absent voting in the lead up to the July 2024 General Election: however, this was not supported by consistent communication from local authorities. The quantitative and qualitative evidence suggests that there was a lack of awareness of the proxy voting changes amongst proxy voters, though this did not have a large impact on absent voting numbers.

4.10.1 Claim summary

To ensure that electors who wish to vote via a proxy are able to easily obtain and return a vote under the new absent voting measures, it is important that electors are aware of the new measures. The absent voting theory of change model suggests that for this to be achieved, there must be targeted communication campaigns to ensure that existing proxy electors are aware of the limit. Proxy voters must also take steps to ensure that their selected proxy does not exceed the proxy limit and that, if they do exceed the limit, proxy voters must find an alternate person to be their selected proxy prior to the deadline. Ahead of the July 2024 General Election, the Electoral Commission developed and delivered a national communication campaign which was supplemented by local authorities' own communications. These activities were expected to raise awareness of the new limit; the option to apply via OAVA; the need to verify identity through the application; and the introduction of proxy limits.

Annex 8 sets out the elements in the proxy voting theory of change model that describe the pathway to change for Claim 2.

4.10.2 Communication of proxy voting requirements

No specific funding was given to local authorities to communicate changes to proxy voting; however, some may have used funding made available for communicating voter identification measures (as set out in section 2.3.1) (MHCLG Economic Evaluation Data).

Overall, electoral administrators were confident in the effectiveness of their communications to the electorate about changes to proxy voting ahead of the July 2024 General Election. A large proportion (83%) of electoral administrators in Great Britain were confident about effectiveness of their communications to raise awareness of OAVA. For proxy voting limits, 77% of electoral administrators in Great Britain said they had taken steps to communicate with electors, and 82% of these respondents were confident their communication with electors was effective (Post-General Election Survey of Electoral Administrators).

In the qualitative research, most electoral services teams did not mention clear communication plans around proxy voting measures and instead suggested that resource around communication was prioritised for other measures ahead of the July 2024 General Election. Electoral administrators in Great Britain said, when surveyed, that the primary channels of communication were updating websites with the appropriate information, letters to electors, updating postal/proxy application forms, social media and making use of Electoral Commission resources (Post-General Election Survey of Electoral Administrators). Some electoral services teams in the qualitative research supported this and suggested that they had used similar communication channels. However, it was clear

that there were fewer defined communication plans for proxy voting measures compared to voter identification, accessibility, and even postal voting.

“We did all our usual stuff. We did it on social medias, on posts and stuff. It's on the poll cards, emails.”

(Electoral Services Manager / Returning Officer, England)

4.10.3 Elector awareness of proxy voting requirements

Almost half of recent absent voters (48%) reported having heard not very much or nothing at all about being able to apply for a postal or proxy vote online (Public Opinion Survey 2024). The relatively low level of awareness was supported by the qualitative interviews, in which proxy voters did not seem to be aware of OAVA as a new measure, even amongst those who had used the service.

“No, I wasn't aware of either of them [OAVA or proxy limits] because it wouldn't have been a concern for me anyway.”

(Elector, registered to vote by proxy)

Electoral administrators in Great Britain also did not believe that electors were aware of these new measures. Only 30% believed that voters were aware of the proxy limits, while over half (59%) said they thought voters were not aware (Post-General Election Survey of Electoral Administrators). EONI also felt that voters were ‘not very aware’ of the proxy limits (EONI Post-General Election Survey of Electoral Administrators).

Some Electoral Services Managers suggested that electors only became aware of the proxy limit if it presented an issue or barrier for them. In these cases, they had been contacted by the local authority about an ineligible or over the limit proxy, and this was the first time they were made aware of the measure.

“I don't think they [electors] were aware until we'd written out to them to let them know [that their proxy had exceeded the proxy limits]. They didn't really react very quickly either.”

(Electoral Services Manager, England)

“No [there was not awareness among electors], not especially, but no, and I'm not sure there would need to be. So obviously, if somebody had [...] been appointed to be a proxy even more than they were allowed, we'd just let them know that they couldn't.”

(Head of Electoral Services, England)

Overall, in the qualitative research, electors did not recall communications around changes to proxy voting. In many cases, proxy voters did not believe that communication

campaigns were successful in raising awareness around these changes, and some mentioned that they were surprised at the lack of information that was shared across communications channels.

“No, [...] I read the news, [...] but I've not seen any [communications] or anything that really talked about that [changes to proxy application and voting]. But then again, maybe I missed [or] might have just dismissed it. But yeah, I'd not seen anything that communicated it to me.”

(Elector, registered to vote by proxy)

4.10.4 Impact of communication campaign and awareness of proxy voting measures

As with postal voting, electors' low levels of awareness for the new measures seemed to have little impact on proxy voters' ability to apply and vote.

Although electors were generally unaware that OAVA was a new service, 93.25% of applications for proxy voting were done online (Absent Voting Monitoring Data). Similarly, with the proxy limits, there did not seem to be many cases where lack of awareness caused significant issues.

Qualitative research with electoral services teams suggested that electors would simply be made aware if there were any issues with the eligibility of proxies, in individual cases where the problem presented itself. If a nominated proxy was ineligible, the elector would be informed immediately once this was noticed in the checks. According to the qualitative research, this generally did not impact electors' ability to obtain a proxy vote: however, there were cases where this had happened due to electors applying at the last-minute before the deadline. This is discussed more in section 4.11.

The majority of electoral administrators in Great Britain (60%) did not experience any applications in breach of the limits. Just over one-third (36%) received 1-5 applications in breach of the limits and 3% received 6-10 applications in breach of the limits (Post-General Election Survey of Electoral Administrators). In the qualitative research, electoral services teams suggested that most of the breaches would just result in a change of proxy, rather than prevent a voter from obtaining a proxy vote altogether.

4.11 Claim 3: Electors who are eligible and want a proxy vote are able to appoint an eligible proxy

	Claim met	Evidence across sources suggests few instances of proxy vote application rejection.
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The evidence suggests that the claim ‘electors who are eligible and want a proxy vote are able to appoint an eligible proxy’ has been met. Instances of proxy voting rejection were low enough to suggest that the new proxy voting measures did not create a significant barrier for eligible proxy voters. This is also supported by the qualitative interviews where electoral services teams suggested that applications were not significantly impacted by the introduction of OAVA, identity verification or the proxy limit. There were some examples provided of eligible proxy voters being rejected: however, this was attributed more to electors applying close to the deadline.

4.11.1 Claim Summary

For electors to be able to obtain a proxy vote, the application process and identity verification must be easy and efficient for electors. Additionally, it is important that the proxy limit does not adversely impact wanting to obtain a proxy vote: should an elector nominate an ineligible proxy, electoral services teams should be adequately prepared to communicate this to the elector; and electors should find it easy to nominate an alternative proxy. To do this, the theory of change outlines that local authority staff need to be sufficiently prepared to process new proxy vote applications (Claim 1), and electors must not be hampered by lack of awareness around changes to absent voting (Claim 2).

The theory of change also outlines that the online system, identity verification and reapplication must not impact the number of electors who want to vote via a proxy, or deter any electors from voting via a proxy. Electors must find the process more convenient as a result of the revised application process.

All the costs associated with Claim 5 have been stated under Claims 1 and 2 (sections 4.9.1 and 4.10.1).

Annex 8 sets out the elements in the proxy voting theory of change model that describe the pathway to change for Claim 3.

4.11.2 Impact of requirements on electors' ability to appoint an eligible proxy

In the qualitative interviews, electoral services teams generally believed that the OAVA measure would attract more people to vote via a proxy rather than cause issues for proxy voters in applying. In one case it was suggested by a proxy elector that without the new proxy measures, they did not believe they would have voted at the July 2024 General Election.

“I probably would have given up [the application process] if it wasn’t online. I don’t think I would have [voted], I would have just been more annoyed with the process. Yeah so it just made it kind of easier, a bit more accessible.”

(Elector, registered to vote by proxy)

Claim 4, below, summarises reasons for proxy vote application rejections. From the figures in the Absent Voting Monitoring Data, it is difficult to understand whether ineligibility of proxies led to any rejections. In the qualitative research, electoral services teams reported some issues with checking for proxy eligibility, but they did not mention instances where this prevented a proxy vote registration or where it led to a failure in obtaining an eligible proxy vote. The majority of electoral administrators in Great Britain (60%) did not experience any applications in breach of the limits. Just over one-third (36%) received 1-5 applications in breach of the limits and 3% received 6-10 applications in breach of the limits (Post-General Election Survey of Electoral Administrators). In the qualitative research, it was suggested that most of the breaches would just result in a change of proxy, rather than prevent an elector from obtaining a proxy vote.

“We had one (elector) who just didn’t realise [the proxy limit] and we just explained that when they try to apply for a proxy, you could only do it for the required number, for two. That was fine, they just got another proxy.”

(Electoral Services Manager, England)

One Electoral Registration Officer suggested that there were cases of people appointing or applying last minute, and when it became apparent that their proxy was not eligible, it meant that they could not vote as it was past the deadline (this was not a large number of electors, however). Proxy limits did however exist prior to the Elections Act, therefore it may have been possible that similar situations to this had occurred before these new proxy limits were established.

“For people who appointed a proxy last minute, because in some cases they were appointing a proxy minutes before the deadline, [...] you had to contact them and say, “it’s not valid and now you’re too late”. So, for those people, it was just, there was nothing else that they could do.”

(Electoral Registration Officer, England)

4.12 Claim 4: Proxy votes are more secure

?	Claim inconclusive	There is insufficient evidence to determine whether proxy votes are more secure.
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There is not enough evidence to determine if the claim ‘proxy votes are more secure’ was met or not. Only a small number of proxy vote applications were rejected. Identity not being confirmed was given as one reason for rejections, which suggests the identity checking process has had an impact on whether electors are allowed to vote by proxy or not. However, a tiny proportion of the applications that were rejected were on the basis of the application being fraudulent, meaning it is difficult to determine the impact of the measures on the security of proxy votes specifically.

Further investigation would be needed to determine whether applications rejected on the grounds of identity verification, contributed to the security of elections.

4.12.1 Claim summary

Claim 4 aims to assess whether the security of proxy votes has increased. The pathway to change (Annex 8) for this claim suggests that the successful implementation of legislation changes related to absent voting and proxy voting specifically lead to the potential for electoral fraud via proxy voting to be reduced, and that no new opportunities for electoral fraud arise.

4.12.2 Proxy vote security

Of the applications that were made for proxy votes between the date the online service went live and the deadline for proxy vote applications in the July 2024 General Election, 7.21% were rejected. Of these rejections, 6.27% were rejected due to identity not being confirmed. As outlined in Claim 7 in the postal voting section, this suggests that applications that would have been accepted previously were not this year, potentially improving the security of proxy votes. However, only 0.03% were rejected due to a fraudulent application (Absent Voting Monitoring Data). It is therefore difficult to determine the impact of the new measures on reducing electoral fraud in proxy voting, especially considering the potential for the measures to act as a deterrent.

The processes associated with identification verification for proxy votes cost £0.2 million in grant funding (MHCLG Economic Evaluation Data).


In the qualitative interviews, electoral services teams generally did not think that the new proxy voting measures had a pronounced impact on the security of elections. Electoral services teams typically did not feel like proxy voting posed any large challenges in terms of electoral fraud prior to the changes. Some teams also suggested that the proxy limits

were not necessarily effective. For example, some suggested that, due to limited communication between local authorities, electors could register to be a proxy across different areas in the UK and therefore vote for people at multiple polling stations without anyone finding out. Others suggested that, on the online system itself, it was hard to determine whether someone was a proxy for multiple people, even within the same electoral area.

“If someone's down to act as a proxy for people in several parts of the UK and several different registers...there's no comparison between them. I could go from place to place on polling day and vote for lots of people on behalf of lots of people and no one would really know.”

(Electoral Services Manager, Scotland)

4.13 Claim 5: The application process for absent voting is more modern, accessible and efficient

	Claim partially met	Evidence across sources was inconsistent on whether the process of applying for a proxy vote was easy for electors. Multiple sources suggest it was inefficient for electoral services teams.
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Evidence for the claim ‘the application process for absent voting is more modern, accessible and efficient’ was not consistent across sources and the claim has been partially met. In the Public Opinion Survey 2024, only half of proxy voters / those registered to vote by proxy found the application process easy. Meanwhile the qualitative research suggested that proxy voters did not find the application process difficult. There was difficulty for electoral services teams in processing applications efficiently, with identity verification and checking for proxy voting limits creating additional work and time pressures ahead of the deadline. As mentioned in Claim 1, despite only small numbers of proxy voters, the process for manually checking proxy limits was viewed as inefficient by electoral services teams.

Future work could focus on creating efficiencies in processing applications for electoral services teams. The functionality of the ERO Portal had improved by the end of the election and efficiency is likely to improve in future. Creating an automated system to check proxy limits within and across local authorities could help in modernising the process for electoral services teams. This was suggested as a future development by electoral services teams through the qualitative research and future work could focus in

this area: however, this should only be the case if resource, funding and potential efficiency gain allows for it.

4.13.1 Claim summary

Claim 5 aims to assess the degree to which changes to the way proxy voters apply for their vote has made the process more modern and efficient for electors and relevant local authority staff. Whether this claim is met is reliant on whether core elements of the previous claims have been met. If local authority staff are able to meet the requirements of the law efficiently (Claim 1); if eligible electors are easily able to obtain a proxy vote if desired (Claim 3); and if efficiency increases, then the theory of change model suggests that absent voting has successfully modernised.

Annex 8 sets out the elements in the proxy voting theory of change model that describe the pathway to change for Claim 5. If these steps are met, the assumption is that electors who want to vote by proxy find the process more convenient, and there is greater efficiency for the local authorities in application processing.

4.13.2 Summary of evidence

Only a small number of recent proxy voters / those registered to vote by proxy were interviewed due to the low overall incidence of proxy voting. According to the survey, only half (47%) of recent proxy voters / those registered to vote by proxy found the process of applying easy. Although the application process is almost identical to postal voting, this was much lower than the finding for postal voting, where 71% found that process easy. However, only 8% of proxy voters said that the application was difficult. A significant proportion of proxy voters responded with 'neither easy nor difficult' (19%), 'can't remember' (15%) or 'don't know' (10%) and therefore it is difficult to draw a definitive conclusion from this data (Public Opinion Survey 2024).

In the qualitative interviews, most proxy voters suggested that both the application and identity verification processes were simple and easy, with little difficulty in finding or supplying the correct information to obtain a proxy vote. This was especially true of those that applied online and were used to doing online applications.

"There was just a web page where you filled in an online form, and it was quite simple and easy to understand... I don't remember [it] being like a long process or [...] hard to interpret."

(Elector, registered to vote by proxy)

"I mean, they have to check your ID and verify you live at the same address and the methods of – if you want to continue as proxy or change to postal. So it's pretty

standard information that they're collecting. So I think it's, you know, I don't see there's any way that they can improve that."

(Elector, registered to vote by proxy)

As stated in section 4.6.1 (the related claim for postal voting), the introduction of the OAVA required £0.1 million in grants, to cover staff training on the OAVA platform (MHCLG Economic Evaluation Data).

Similar to findings for the application process for postal voting, electoral administrators suggested that issues with ERO Portal functionality created inefficiencies in the application process from the local authority side. The top three concerns for electoral administrators in Great Britain in implementing OAVA were volume of applications (75%), dealing with paper applications (37%) and issues with ERO Portal functionality (30%) (Post-General Election Survey of Electoral Administrators). Each of these concerns could relate to proxy applications as much as to postal ones, which would suggest that the process was not efficient.

However, in the qualitative research, the volume of comments relating to postal voting compared to proxy voting suggests these issues could be attributed more to postal vote applications and the delays being caused by the high volume of postal vote applications.

Specifically for the proxy process, the need to check proxy eligibility did add additional workload to electoral services teams. The manual checks and additional communication required with electors was also time consuming.

"We do check how many people somebody's a proxy for, within our own systems, but as the campaign and the timetable went on, our ability to check those things becomes more and more limited."

(Electoral Services Manager, Scotland)

4.14 Claim 6: Electors are confident that proxy voting is secure

?	Claim inconclusive	There is insufficient evidence to determine whether electors feel proxy voting is secure.
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Evidence is inconclusive as to whether the claim 'electors are confident that proxy voting is secure' has been met. Only around half of adults in Great Britain think voting by proxy is

safe from electoral fraud. This leaves a substantial portion of the population who are not convinced or at least uncertain or unaware whether proxy is a secure voting method. During qualitative interviews, electors did not suggest that the measures put in place improved their confidence in proxy voting. On the other hand, some electors suggested that any changes to enhance security were viewed positively. As a result, improving elector awareness of the new measures could perhaps improve confidence in the security of proxy voting.

4.14.1 Claim summary

Claim 6 aims to assess whether electors have greater confidence in the integrity and security of voting via proxy. The pathway to change suggests that successful implementation of the legislation changes leads to public awareness of what these changes are and greater confidence in the integrity and security of voting via proxy.

Annex 8 sets out the elements in the proxy voting theory of change model that describe the pathway to change for Claim 6.

4.14.2 Summary of evidence

Only half (50%) of voting age adults in Great Britain said voting by proxy is safe from electoral fraud (this was consistent with survey findings from previous waves) and 17% thought it was unsafe. This was lower than the 61% who thought voting by post was safe (16% thought this was unsafe) and the 87% who thought voting in person was (3% thought this was unsafe) (Public Opinion Survey 2024).

During qualitative interviews, there were electors who suggested they had never really thought about the security of proxy voting but, when prompted, thought that any measures to improve the security of proxy voting were a good idea. For some electors, the new measures did not impact their perceptions of how secure proxy voting is, as they believe that proxy voting is fundamentally not secure because it is based on trusting someone else.

“I couldn't help feeling I wouldn't trust a proxy vote. I'd want to know...whatever [ballot] goes in, it's got their choice on there [i.e. the person whose vote it is] and not the person that's doing the proxy vote for them [i.e. the person acting as the proxy]. Because I feel sometimes you can sway people with your own ideas.”

(Elector, registered to vote by post)

5 Overseas electors

The aim of the overseas electors measures are to allow all British citizens living abroad to vote in UK Parliamentary elections and simplify overseas elector registration by allowing electors to stay registered for longer. The Elections Act 2022 introduced two major changes relating to overseas electors:

- The 15-year limit on overseas electors' voting rights has been removed, allowing all British citizens overseas (including eligible Irish citizens) to register to vote in UK Parliamentary elections regardless of when they left the UK or whether they were previously registered to vote;
- Previously, overseas electors had to reapply annually. Now, once registered, overseas electors remain registered for up to three years, before a renewal declaration is required. A fixed-point renewal process has been introduced, meaning that all registrations are valid until the third 1st November following registration. Additionally, in Great Britain, an overseas elector's registration is now aligned with any absent vote arrangement they have applied for, meaning that an overseas elector will be able to renew their registration and absent vote arrangement at the same time. Other arrangements apply in Northern Ireland.

The July 2024 UK Parliamentary General Election was the first time British citizens (including eligible Irish citizens) living overseas for longer than fifteen years were eligible to vote, not including by-elections.

To support the implementation of these measures, legislation required local authorities to implement the changes and policy consistently across the UK. In Great Britain, digital improvements were developed to support the new measures. The new legislation also gave overseas electors an alternative way of proving their identity through documentary evidence, if they could not provide the information required for automatic identity checks (e.g. National Insurance number).

The Electoral Commission developed and undertook a targeted communications campaign, primarily through partnership working, to raise awareness amongst British nationals living abroad. This campaign was amplified through a variety of government communication channels, particularly involving promotion of messages through Foreign and Commonwealth Development Office channels, diaspora organisations and the largest Westminster political parties' overseas affiliates. The Electoral Commission also used a 'tell your family and friends' approach as part of their campaign to encourage people in the UK to raise awareness of the changes amongst members of their networks living overseas. The overseas electors theory of change, presented in Annex 9, Figure A.9.1, sets out the process for implementation of the overseas electors measures and their

intended effects. The rationale for the overseas electors measures was driven by manifesto commitments of the previous UK Government in 2019:



- to make it easier for British expats to vote in UK Parliamentary General Elections, supporting overseas electors by keeping them on the register longer; and,
- to extend the franchise by removing the 15-year limit on overseas electors' voting rights.

This evaluation is designed to assess whether the overseas electors measures were implemented as intended, and produced the intended effects, as set out in the theory of change model. A total of seven contribution claims were identified from the model, detailing the key pathways between processes and effects. The extent to which these claims had been met was assessed based on the available evidence.

Throughout this section, the term overseas 'elector' will refer to individuals who successfully registered to vote. Individuals who submitted an application to register to vote will be referred to as overseas 'applicants', as this does not mean they were eligible to vote. 'British citizens living abroad' is used to refer to all individuals who may be eligible to vote, but have not applied or successfully registered to vote as overseas electors.


Table 5.1 presents these claims and our conclusions against each. In the subsections that follow, evidence collected to either support or challenge whether each claim has been met, is presented.

Table 5.1 Overview of overseas elector contribution claims and conclusions

Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 1: Local authority staff meet their requirements by law		Claim met	There is sufficient evidence to demonstrate that local authority staff received the necessary training and felt prepared to deliver the requirements in line with legislation.
Claim 2: Local authority staff workloads are manageable at peak points around the election cycle		Claim partially met	There is sufficient evidence to demonstrate most electoral administrators felt the number of applications was manageable. However, there is also evidence, across multiple sources, of concerns around time-consuming registration checks.

Claim 3: Communications effectively raise awareness of reform amongst eligible British citizens living abroad	?	Inconclusive	As evidence is limited to overseas electors who had applied to register to vote, this claim cannot be fully assessed. The evidence available points to British citizens living abroad being a hard-to-reach audience.
Claim 4: Overseas electors who want to vote are able to correctly apply in time to vote	?	Inconclusive	There is insufficient evidence for this claim, as it is not possible to know the proportion of British citizens living abroad who wanted to register to vote and successfully did so.
Claim 5: Newly enfranchised British citizens living abroad register to vote as overseas electors	≈	Claim partially met	There is insufficient evidence for this claim, with some indications that newly enfranchised electors did register to vote.
Claim 6: Overseas electors who want to vote are satisfied with the process of registration	?	Inconclusive	There is insufficient and mixed evidence for this claim, relying solely on qualitative interviews with overseas electors and electoral services teams.
Claim 7: Integrity of overseas elector registration is maintained	≈	Claim partially met	There is insufficient evidence for this claim. Some applicants tried to register in the wrong constituency, but the new measures were not seen as a risk to the integrity of elections. There were some mentions of increased trust.

5.1 Claim 1: Local authority staff meet their requirements by law

	Claim met	There is sufficient evidence to demonstrate that local authority staff were well prepared for overseas elector requirements and implemented their requirements in line with the law.
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The evaluation evidence is consistent and sufficient in supporting a conclusion that the claim 'local authority staff meet their requirements by law' was met. Training and guidance

were delivered to electoral services teams, who felt prepared and adequately staffed to implement the requirements.

5.1.1 Claim summary

Claim 1 assesses the degree to which local authority staff fulfilled their roles in implementing the overseas electors measures, as set out in the Elections Act 2022. This is an important step for the overseas electors theory of change, as electoral services teams' work - from the day the franchise change came into effect up until the election deadline - was essential in enabling overseas electors to register to vote and apply for an absent vote in time.

Annex 9 sets out the elements from the overseas electors theory of change model that describes the pathway to change for Claim 1.

The theory of change suggests that local authorities must engage with the content of the new measures, receive adequate training and guidance, and develop procedures to implement them. The expected outcomes are that local authorities understand how the legislation and guidance should be enforced, and an increase in workloads after implementation due to larger volumes of eligible electors registering.

5.1.2 Readiness for implementation

To support local authority staff to meet their requirements by law, a total of £0.2 million was spent on training registration staff within local authorities. This training was to support staff to review the registration applications made by overseas applicants following the changes to the application requirements (MHCLG Economic Evaluation Data).

In preparation for implementing the new measures, 96% of electoral administrators reported that relevant staff had received this training. Just over half (53%) of electoral administrators found this training was extremely or very effective, and 39% found it was somewhat effective, which indicated a key element of the claim was met (Post-General Election Survey of Electoral Administrators).

This was reflected in qualitative research carried out with electoral services teams. Respondents mentioned the online training gave them a basis of understanding around the legal implications of the new measures, the theory behind them and the software they would need to use.

“Internally, we had undertaken all kinds of different trainings both from the software suppliers [and] from the electoral Association of Electoral Administrators. So, we knew the theory behind it and what, legally, people were supposed to be doing.”

(Deputy Manager of Electoral Services, England)

There was a high level of preparedness in terms of training and staffing in July 2024:

- 80% of electoral administrators felt very or fairly prepared in terms of staffing;
- 79% of electoral administrators felt very or fairly prepared in terms of the training they received.

Further, the majority of electoral administrators felt very or fairly prepared in terms of digital processes (registration and absent vote applications on the new Electoral Registration Officer Portal (ERO Portal), including registration, identity, and qualifying address checks) (68%) and managing the volume of applications (65%) (Post General Election Survey of Electoral Administrators). The qualitative research reflected this, although there were mentions of access to the portal being given later than would have been ideal.

"We just didn't know until late in the day how long it was [going to] take to process a lot of these [...] Once we actually started using the portal, again later than we would have liked, that alleviated any stress we might have had before, but had we had the system a year in advance or whatnot, then it would have been a lot better."

(Electoral Services Manager, England)

Qualitative interviews highlighted potential reasons for which a minority of electoral administrators may not have felt very or fairly prepared in terms of digital processes. Some electoral administrators mentioned they only had capacity to engage with written training materials on how to use the new ERO Portal, and felt these were not detailed enough. Although this feedback related to the ERO Portal in general, it impacted how prepared electoral administrators felt to implement overseas electors measures specifically. For example, one electoral administrator did not understand ahead of time that they would not be able to communicate directly with overseas applicants through the ERO Portal, and thus incorrectly anticipated the work needed to register overseas applicants.

"Two pages. Two pages [of guidance on the ERO Portal], but there were some webinars if you had the time to go and sit and watch them, which when I was doing 16 and 20 hour days – you don't have time to do that."

(Electoral Services Manager, England)

"There was guidance there and some training provided, but I think this was another area where it might have fallen to the wayside in favour of some of the other things that were coming in at the same time, and other things that we have to learn [...] we were muddling through and dealing with functionality changes in the portal and then changes to our process [...]. So kind of learning it as you're going along."

(Electoral Services Manager / Returning Officer, England)

Overall, the evidence suggests Claim 1 was met. Electoral administrators showed high levels of engagement with what was necessary to implement the measures.


5.1.3 Delivery of overseas electors measures in the July 2024 UK Parliamentary General Election

Overall, there was evidence from multiple sources suggesting preparation for the July 2024 General Election was successful. Key enablers, which helped electoral administrators implement the overseas electors requirements, were: Association of Electoral Administrators (AEA) training (72% of electoral administrators said this was an enabler); Electoral Commission's guidance (65% said this was an enabler); and AEA support (53% said this was an enabler) (Post-General Election Survey of Electoral Administrators).

It was estimated that 171,749 overseas applications were made from service 'go-live' (16th January 2024) up to the deadline for the July 2024 General Election (18th June 2024) (Overseas Electors Monitoring Data). Overall, 191,338 overseas electors were on the electoral register for the July 2024 General Election ([Electoral Commission](#)). The number of registered overseas electors is higher than the number who applied to register, because some overseas electors had already registered prior to service 'go-live'.

It is important to note, however, that the number of registered overseas electors was lower than previous elections, despite the expansion of the franchise to all British Citizens living abroad. For example, in the December 2019 UK Parliamentary General Election, 233,000 overseas electors registered to vote ([House of Commons Library](#)).

5.2 Claim 2: Local authority staff workloads are manageable at peak points around the election cycle

	Claim partially met	There is sufficient evidence to demonstrate that most electoral administrators felt the number of applications was manageable. However, there is also evidence, across multiple sources, of concerns around time-consuming registration checks.
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There is mixed evidence in relation to the claim 'local authority staff workloads are manageable at peak points', suggesting that the claim has been partially met. Most electoral administrators found the overall number of applications manageable, as applications were low. The ERO Portal enabled electoral administrators to process

overseas electors' applications efficiently (when applicants provided the correct documentation).

However, there is also evidence of staff concerns due to the disproportionate time spent on a small number of registration applications when overseas applicants supplied inadequate evidence or applied via the incorrect route or constituency. Looking forward to future elections, whether workload remains manageable may depend on whether higher numbers of overseas electors register to vote.

The registration period extension (from one to three years) is an important aspect of this claim, and is meant to alleviate workloads, but the impacts of this cannot be evaluated for another few years.

5.2.1 Claim summary

Claim 2 assesses whether local authority staff workloads were manageable at peak points around the election cycle. The extent to which this claim is met impacts further claims in the theory of change, as delays resulting from high workloads can have an impact on overseas electors' ability to register in time to vote (Claim 4) and satisfaction with the process (Claim 6). Evidence for this claim focusses largely on the delivery of the expansion of the franchise to all British citizens living overseas, as the potential impact of the extended registration period (from one to three years, to alleviate workloads) cannot yet be evaluated.

Annex 9 sets out the elements from the overseas electors theory of change model that describe the pathway to change for Claim 2. One main element of this claim is that there is an anticipated increased workload immediately after implementation, due to the expected larger volumes of overseas applicants registering post-franchise extension. Being able to deal with these increased volumes relies on the new digital system developed to process applications efficiently. The desired impacts would be maintained levels of public trust and satisfaction with the running of elections, and an increased number of overseas electors remaining registered, following the extension of the registration period to three years. The extended registration period for overseas electors would also contribute to lowering peaks in applications, reducing pressure on local authorities ahead of elections.

5.2.2 Preparedness for implementation of overseas electors measures

Electoral services teams engaged with the requirements by hiring more staff: 55% said they did so to process overseas elector applications for the newly enfranchised cohort in the period before the July 2024 General Election (Post-General Election Survey of Electoral Administrators). There was qualitative evidence that those who did not hire more staff may have re-organised their existing teams and circumscribed the overseas elector

workload to trained members of staff, who were better equipped to handle the complexity of overseas elector application checks.

"We had two members of staff that were specifically focused on doing that [overseas elector applications checks], the deputy manager and our grade five. So, they made sure that they'd read all the guidance and done all the training. And from that perspective, [...] we were as prepared as we could be for it."

(Head of Electoral Services, England)

This indicated that most local authorities had anticipated and prepared for higher overseas elector registration numbers. There was evidence in the qualitative research that electoral services teams had a positive experience as a result of this preparation. As mentioned in Claim 1, levels of preparedness were deemed sufficient, suggesting that this part of Claim 2 was met.

"For overseas [applicants], we tend to keep that with more experienced members of staff, where possible, because the applications can be a bit trickier than a simple postal application. In terms of numbers, not as high as I was expecting, which I was thankful for, because with it being new you never know how many [you] are [going to] get and how labour-intensive it was going to be. It was quite manageable for from our perspective, and they all got processed."

(Electoral Services Manager, England)

That said, as mentioned in Claim 1, qualitative evidence also suggested that some electoral services teams felt that high workloads prevented them from fully digesting the training provided.

5.2.3 Delivery of registration application checks

As mentioned in Claim 1, it is important to note that there were fewer overseas elector registration applications overall in the July 2024 General Election than in the previous December 2019 General Election. Close to three-quarters (73%) of electoral administrators felt the number of applications was manageable. This was reflected in qualitative research with electoral administrators.

"I was used to working on fixed parliamentary dates and you would gradually see the online, the overseas picking up as it got closer to the election, whereas people didn't necessarily have time before this one because it was a snap calling and no one expected it. So, it's very difficult to analyse the numbers [...]. And I think we had about 350 overseas electors for this, which isn't huge. I thought by opening it up to more electors it would have been higher, but that could have been the timing of the election."

(Electoral Services Manager, England)

However, there remained a substantial minority of electoral administrators (20%) who felt the number of applications was not manageable (Post-General Election Survey of Electoral Administrators). The available qualitative evidence showed that although overall overseas electors application numbers were low, applications were not spread evenly across different areas, and some areas experienced surges in numbers while others saw low numbers.

An expected outcome of the policy was an increase in workloads, as more electors became eligible to vote, and verification processes became more complex, meaning more time had to be spent processing applications. Quantitative evidence confirmed this was the case: nearly all (95%) electoral administrators felt an increase in their workloads due to implementing overseas elector measures, with the remaining respondents selecting 'not applicable' (Post-General Election Survey of Electoral Administrators). Additionally, when asked to select the top three concerns that may have impacted on their ability to implement the Elections Act requirements relating to overseas electors, 66% of electoral administrators said the time-consuming verification process and increased staff workload in verifying applications was a concern. This was the second most selected concern, the third most selected concern being levels of understanding regarding the changes and new processes amongst applicants (33%) (Post-General Election Survey of Electoral Administrators).

Qualitative evidence suggests this increase in workloads may have resulted in particular from the time-consuming nature of processing overseas elector applications when they contained errors, and difficulties overseas applicants and staff faced in understanding the complex registration processes.

"The numbers weren't as high as we feared they would be. But for the numbers that we did have, it was a nightmare. Very few [applications] that went on [the system] just checked all the boxes and were fine. People were totally confused about whether they were applying via registration or applying via residency."

(Electoral Registration Officer, Scotland)

"It took all of my registry notice time [...] we are talking about 100 electors. That's how time consuming they are."

(Electoral Services Manager, Wales)

Just over half (53%) of electoral administrators found the new registration system much or slightly slower (36% said much slower) in terms of how long the process of registering overseas electors took. 28% said it was much or slightly quicker (Post-General Election Survey of Electoral Administrators). This aligns with the expected impact of the new measures, which were more complex to implement in order to accommodate electors who had been abroad for more than 15 years and the different registration routes.

Qualitative research highlighted some possible reasons why the new registration system was slower, the causes of which related to the complexity of accommodating electors who had been abroad for more than 15 years and where registration records were no longer available. One reason was that overseas applicants did not always have the correct, required information. Overseas applicants needed information to evidence either: the last UK address at which they were registered to vote (previous registration condition); or the last UK address they had resided in, even if they were not registered to vote at the time (previous residency condition). These will be referred to as registration / residency routes going forward. The registration route was the only option before the new measures were introduced, with the residency route being introduced as part of the new measures, to enfranchise those who were not previously registered to vote in the UK. Overseas applicants who had difficulties accessing the necessary documentary evidence submitted applications which contained errors, or applied via the incorrect route. Electoral services teams reported engaging in back-and-forth communication with these applicants via the phone or email, which increased their workloads significantly.

“They transfer the problem for them [overseas applicants] not having the information needed, to us, and expect us to try and help sort it out for them. So that's very, very time consuming from that perspective.”

(Head of Electoral Services, England)

Another element which highlights the complexity of the new registration checks was that registration and address registers for the newly enfranchised electors who left the UK over 15 years ago were not always accessible online, due to their age. To conduct the necessary checks for these applicants, electoral administrators looked back through physical archives.

“Especially sometimes having to go and look at very, very historic registers [...] we were going back to the public library [...] we had one member of staff [...] the number of times he had to go over there to verify that this was their last address 17, 18 years ago. So that was very burdensome.”

(Electoral Services Manager, England)

Some electoral administrators also mentioned difficulties caused by the impossibility of switching between different application routes (registration / residency). This meant that applications had to be rejected if an applicant had applied incorrectly, or did not have access to the required evidence for their selected registration route. This is a result of what the legislation itself allows, rather than the ERO Portal's functionality.

"The difficulty was the two pathways that you can take, the previously registered or the previously resident. You couldn't switch the applications between the pathways. That's legislatively not allowed. So, if somebody applies as previously registered and they haven't been previously registered, but they said, 'oh I did live there, and I can prove that', anybody would think that you could just use that application to then make a previously resident application, but you can't. You have to reject it and ask them to make a new application which is just madly time consuming."

(Electoral Registration Officer, Scotland)

There were also some mentions of the application process being more time consuming as the registration and postal vote applications were not directly linked on the system, as they were previously. This meant electoral administrators had to do an additional check to make sure overseas applicants were registered to vote and had an absent voting method in place.

"The fact that the postal or proxy application isn't necessarily being linked to [...] the overseas application in the first instance so that additional check [takes time, whereas] in the past those two things were linked, it would come in as an application with everything all together."

(Senior Electoral Services Manager, England)

However, when electors provided the correct evidence, qualitative evidence showed that the new online registration system had made the registration checks and processing more efficient than it had been in the past.

"The portal and the back-office process doing automated checks with our software and our electronic registers really helped speed it up. So yeah, we managed the volume far better than what we've done in previous elections. If they haven't followed a happy path and there's queries on there and you've got to go back and forth, they take a while, but if somebody's application is spot on and it matches and it's just a case of us taking and signing it off, they were a lot quicker, which was brilliant for us."

(Electoral Services Manager, Wales)

5.2.4 Impact on electoral services teams and implementation

Electoral services teams expressed some concerns about delivering overseas electors changes. Processing overseas electors' registration applications was one of the top three issues electoral administrators faced overall at the July 2024 General Election (including when thinking about other Electoral Integrity Programme measures and broader delivery challenges): 41% said this had been a concern (Post-General Election Survey of Electoral Administrators).

Moreover, only 37% said the implementation was very good or good, and 23% said it was unsatisfactory or problematic (Post-General Election Survey of Electoral Administrators). Qualitative findings suggest that a reason for this may be high workloads, with disproportionate amounts of electoral administrators' time spent on a small number of overseas elector applications which contained errors. This may have been one factor which impacted on how well electoral administrators felt the measures were implemented.

Qualitative research also indicated some members of the electoral services teams may not have had enough capacity to manage workloads had the number of applications been higher. This indicates that Claim 2 was partially met.

"I'd say based on the volume we've got we managed... if it had been as we anticipated, which it wasn't, then I'm not so sure we would have managed, but it was low in comparison to what we expected."

(Electoral Services Manager, England)

It is not possible to conclude that Claim 2 was completely met, as it has not been possible to assess the impact of the registration period extension on electoral services teams' workloads. The nature of these changes means their effects will only be noticeable in two to three years, or in the run-up to the next UK Parliamentary General Election.

5.3 Claim 3: Communications effectively raise awareness of reform amongst eligible British citizens living abroad

?	Claim inconclusive	As evidence is limited to overseas electors who had applied to vote, this claim cannot be fully assessed. The evidence available points to overseas electors being a hard-to-reach audience.
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Due to the limited evidence, it cannot be concluded whether the claim 'communications effectively raise awareness of reform amongst eligible British Citizens living abroad' was met. It is not possible to capture the total number of British citizens who have lived abroad

for over 15 years and are newly enfranchised (eligible to vote) under the new measures. Therefore, it is not possible to draw a conclusion on what proportion of newly enfranchised overseas electors the communications reached effectively. Additionally, participants in the qualitative research had all applied to register to vote as overseas electors, meaning those who communications did not reach were not captured in this research. Therefore, it is not possible to fully assess whether this claim was met.

Furthermore, electoral services teams had mixed views on how effectively their communications had reached their intended audience, as British citizens overseas were seen as a hard group to reach through mass communication. The available evidence suggested communications were developed and delivered by local authorities via social media, email and online.

The Electoral Commission also had a communications campaign that was amplified through a variety of government communication channels, particularly Foreign and Commonwealth Development Office channels, diaspora organisations and the largest Westminster political parties' overseas affiliates. Further, the Electoral Commission used a 'tell your family and friends' approach as part of their campaign to encourage people in the UK to raise awareness of the changes through members of their networks living overseas. As with local authority communications, it is not clear how effectively these communications reached their intended audience.

5.3.1 Claim summary

Claim 3 assesses the extent to which communications effectively raised awareness of the reforms amongst eligible British citizens living abroad. In order for newly enfranchised British citizens living abroad to apply, the legislation required the Electoral Commission to develop communications materials and key messaging to raise awareness and promote the franchise change. Whether the claim is met or not depends mainly on how well overall awareness is raised through communications materials. Digital services and paper forms are intended to make applicants aware of the specific routes and documents needed to apply at the point of application (rather than high-level communications dealing with this).

Annex 9 sets out the elements from the overseas electors theory of change model that describe the pathway to change for Claim 3. The main expected output is awareness of the changes amongst newly eligible British citizens living abroad.

5.3.2 Development and delivery of communications materials

The Electoral Commission spent £0.1 million on communications to raise awareness of the changes for overseas British citizens (MHCLG Economic Evaluation Data).

Communicating en masse to overseas British citizens was a challenge as there is no unifying register of their geographical location and contact details. There was evidence that electoral administrators raised awareness about the expansion of the franchise amongst overseas British citizens via available means. These included social media (including by sharing Electoral Commission's material), through website updates and by email (Post-General Election Survey of Electoral Administrators). There was qualitative evidence to suggest some of these efforts were effective, as some electors reported hearing of the franchise change through these routes. However, to caveat the qualitative research findings for this claim, it is important to note that all overseas electors who participated had submitted a registration application, meaning they had some awareness of changes to overseas electors measures.

Qualitative research suggested a range of online methods had been used by family, friends and expat networks to raise awareness, including social media (Facebook groups, posts) and emails.

"It's a group that started in Spain and it belongs to a wider European group. And it's basically [...] British people that live in Europe, but wanted to remain part of the European Union and would also vote to rejoin. I'm not particularly active in that, I'm just [...] kind of an onlooker, but it's something I agree with. So, I had seen it, I think, in various posts in maybe Facebook."

(Overseas elector, voted)

Secondary sources of information, such as word of mouth or TV, were also mentioned, particularly as an alternative to social media, for reaching older age groups.

"Friends and family hearing about it really, that's how the usual network works, or if you go for a beer you talk about it over a beer. That's how you share the information normally. A lot of people aren't on social media, particularly if you're British overseas people who have retired, a lot of them are not on social media at all, so unless it comes up in the news headlines, they watch Sky News and everything, everyone's got a satellite dish."

(Overseas elector, did not vote)

Communication about the extended registration period for overseas electors was less prominent, according to qualitative feedback from electors. Electoral administrators also said they did not do outreach, beyond what was required by overseas elector regulations, to contact electors about the extension of the registration period (Post-General Election Survey of Electoral Administrators).

5.3.3 Impact of communication to British citizens living abroad

Communicating to British citizens living abroad is a complicated task, as they are spread out across continents, and there is no single communication channel that can be used to reach them en masse. Quantitative research pointed to this: only a small majority of electoral administrators (60%) were very or fairly confident in the effectiveness of the work that had been done, by their press office or any other relevant teams, to raise awareness of the franchise change; whilst 10% of electoral administrators were not very or not at all confident in the work that had been done to inform British citizens living abroad (Post-General Election Survey of Electoral Administrators). In qualitative research, electoral administrators reflected the feeling that, although they took action to publish the information in different ways, ultimately British citizens living abroad were a hard population to reach out to effectively.

“We reached out to those that we knew were already overseas electors, to make sure everyone was registered and had their absent vote in place when the new measures came in. And then I think [name] looked back historically: who over the last few years has gone past their 15 years [...], to reach out to them. Other than that, you don't know who your target audience is, or how to reach them, so we're not aware what their awareness is.”

(Electoral Services Manager, England)

Electoral services teams also highlighted some countries were potentially easier to deliver information to than others. This was reflected in qualitative research with overseas electors themselves.

“I can't see how the government could possibly have told everybody because they don't know where we are. [...] maybe there could have been more publicity or maybe it was just random. I mean, there may have been lots of items about it back when it was passed. And I just happened to miss [it].”

(Overseas elector, did not vote)

Therefore, the main issue with raising awareness of overseas elector changes was their geographic spread, and the lack of practical means to reach out to them en masse.

Separately, for overseas applicants who engaged with high-level communications about overseas elector changes and decided to register, electoral administrators were concerned about their level of understanding regarding the changes and new processes. These findings reflect the complexity of the rules underlying the online registration process. A third (33%) of electoral administrators cited this as a concern which they believed may

have impacted on their ability to implement Elections Act requirements relating to overseas electors (Post-General Election Survey of Electoral Administrators).

Moreover, the three most common issues electoral administrators encountered when registering overseas electors all relate to applicants' awareness and understanding of the measures: 79% of administrators encountered applicants not applying at the correct qualifying address, 71% encountered applicants who didn't have the right documentary evidence, and 62% encountered applicants applying under the incorrect eligibility conditions (Post-General Election Survey of Electoral Administrators). To caveat these findings, the statistics above do not indicate how often electoral administrators encountered this issue, only *if* they encountered them (even just once).

Further, the low level of awareness regarding the details of what was needed to apply, as mentioned in Claim 2, impacted on the efficiency of processing registration applications. Qualitative research indicated that overseas electors who had been made aware of the changes did not always understand the different registration routes well, for example.


“People were totally confused about whether they were applying via registration or applying via residency. [...] Somebody should be able to make an application and then we determine whether it's under registration or residency.”

(Electoral Registration Officer, England)

This suggests that overseas applicants did not fully understand the complex rules behind the application routes.

Overall, the number of overseas electors who registered to vote in the July 2024 General Election was low. However, the limited quantitative and qualitative evidence available does not allow for a direct causal link to be made between the effectiveness of high-level communications and the low number of applications. Nonetheless, from the available evidence, British citizens living abroad appear to be a hard group to communicate to effectively in a centralised way. External factors such as newly enfranchised British citizens living overseas, who left the UK over 15 years ago, being potentially less engaged in the UK's democratic process, could also be considered.

5.4 Claim 4: Overseas electors who want to vote are able to correctly apply in time to vote

	<p>Claim inconclusive</p>	<p>There is insufficient evidence for this claim, as it is not possible to know the proportion of British citizens living abroad who wanted to register to vote and successfully did so.</p>
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The evaluation evidence indicated that the claim ‘overseas electors who want to vote are able to correctly apply in time to vote’ was inconclusive, as it was not possible to establish what proportion of British citizens living abroad who wanted to vote, successfully registered. The available evidence from electoral administrators and monitoring data indicated that the number of overseas electors who registered in time to vote was much lower than anticipated.

As established in the analysis of evidence in Claim 1, procedures were in place to implement the franchise changes. However, quantitative and qualitative evidence pointed to some issues affecting how long overseas electors’ registrations took in total, in particular low applicant understanding of the process, and the time-consuming nature of conducting verification checks or resolving issues with applications. In some instances, although applicants were still able to register before the deadline, the delays caused by these issues created difficulties voting in time when combined with external factors, such as the time it took for postal vote packs to travel internationally. This was a source of concern amongst electoral administrators and overseas electors.

5.4.1 Claim summary

Claim 4 assesses the degree to which overseas electors who wanted to vote were able to correctly apply in time to vote. This largely depends on whether earlier claims were met: Claim 1, whether the correct processes were in place regarding registration checks; Claim 2, whether electoral services teams could manage high workloads at peak points around the election cycle; and Claim 3, if high-level awareness was raised so that newly enfranchised electors were aware they could now register to vote. It also requires newly enfranchised overseas electors to register, providing information as set out in the new legislation and within the deadlines; and to apply for an absent vote (unless voting in person).

Annex 9 sets out the elements from the overseas electors theory of change model that describe the pathway to change for Claim 4. The available evidence focuses primarily on expansion of the franchise to all British citizens living overseas, as it is too early to determine the impacts of the registration period being extended from one to three years.

All the costs associated with Claim 4 have been stated under Claim 1 (section 5.1.1).

5.4.2 Readiness for processing applications

The analysis of evidence for Claims 1 and 2 showed that systems and resources were in place for electoral services teams to process overseas elector applications. Overall, 171,749 overseas electors submitted applications since service ‘go-live’ (Overseas Electors Monitoring Data). However, the evidence available does not indicate whether

these processed applications represented a high proportion of British citizens living abroad who wanted to vote, so the claim was inconclusive.

Although local authorities developed processes to implement the overseas elector measures, qualitative evidence suggests the fact the election was called relatively soon after the new measures were brought in meant electoral administrators had to familiarise themselves with changes relatively quickly. Further, electoral administrators reported in qualitative research that there was not enough time after the election was called to comfortably register overseas electors and process their absent vote applications in time for them to vote. While this issue did not result from the new measures, it may have been amplified by challenges relating to the new measures, for example, newly enfranchised electors having greater difficulty confirming a qualifying address therefore taking more time to register. It is not possible to say the extent to which this was the case.

This may have been compounded by their lack of familiarity with the new registration system. As shown in Claim 2, administrators expressed concerns that the increased workload due to these complexities may have impacted on their ability to process overseas registration applications efficiently (although, as outlined in Claim 2, this increased workload was an expected outcome of the new measures, due to the additional complexities and increased population of overseas electors). It is not possible to say the extent to which these issues were compounded by the new measures, or whether these concerns would have been in place even without the changes to the registration process.

There were mentions that the complexity of the new registration process using the ERO Portal, and the fact that electoral services teams needed time to familiarise themselves with it, meant it took longer than anticipated to process each registration application.

"Getting to understanding the process on the portal for processing them, they are much more difficult, if you like, than processing the VACs [Voter Authority Certificates] or the absent votes, which we've also been doing for quite some time now. So, I think we have a shorter time period to get to grips with the new online system for processing those, and the different steps involved as well, if they weren't previously registered, and then the different steps and then verifying them. So, there was lots of more, I would say, difficulties with the overseas applications, definitely, which were, again, more time consuming."

(Electoral Services Manager, England)

There is limited evidence to understand whether the time added to processes, because of the new measures, meant staff weren't able to process valid applicants in time for them to register. It may be the case that some electors with a 'rejected' outcome (more likely for the newly enfranchised) could have converted to registered, if given more time to resolve

issues such as proof of qualifying address. The evidence available cannot confirm this either way.

5.4.3 Overseas applicant awareness of registration requirements

As mentioned in Claim 3, there appeared to be low levels of understanding of the registration process amongst overseas applicants, and this meant delays and inefficiencies in the registration and absent vote application process.

“I think there's a real lack of understanding of the electorate about what they need to do to evidence their connection, and a real lack of ability for them to evidence their connection to addresses.”

(Head of Electoral Services, England)

Furthermore, qualitative feedback from electors suggests that some electors felt the online system did not provide sufficient information and signposting to ensure they were registering using the correct route for them.

“It was slightly confusing. I think because, if you're an overseas voter and your circumstances will be somewhat unique, you do have to interpret the rules a little bit to figure out what they actually are. I did find myself stuck in the loop where you're reading what the rules are and it says if you're such and such a voter or if you've lived in such and such a place [...] see here. So, you then click that, and it gives you some other advice and then you end up going back in a circle.”

(Overseas elector, did not vote)

This may impact whether Claim 4, ‘overseas electors who want to vote are able to correctly apply in time to vote’ was met. This is because errors in applications meant that applications were more time-consuming to process, as shown in Claim 2, meaning there was less time to register overseas applicants and get any absent voting arrangements in place.

5.4.4 Delivery of overseas electors measures

The main mechanism enabling applicants to register was the GOV.UK online service: 99% of overseas elector applications were made this way since data collection started (Overseas Electors Monitoring Data). The online system was the most practical option for a majority of overseas applicants.

Absent vote arrangements

There was a total of 190,708 absent vote applications (93,649 proxy and 97,059 postal) made from overseas since service ‘go-live’ (16th January 2024). This represented 111% of

the total overseas registration applications since service 'go-live'. This figure is over 100% for two reasons: postal and proxy vote applications from overseas do not necessarily imply the application was made by an overseas elector (they could have come from UK residents who happened to be overseas at the time); and many of these would have come from overseas electors who were already registered prior to service 'go-live' (Overseas Electors Monitoring Data). It is not possible to determine the specific number of overseas applicants who successfully registered and applied for an absent vote arrangement *after* the new changes came into place. As such, it is not possible to draw a conclusion from this evidence about whether Claim 4 was met.

Postal voting timings

As stated earlier, the time that it took postal votes to arrive to overseas electors, or return from overseas electors, was not directly caused by the new measures, as there were no changes to the electoral timetable. However, it may be the case that issues resulting from the time it took for postal votes to arrive with overseas electors may have been exacerbated by the new measures. For example, it taking longer to register some overseas electors may have reduced the time available for their postal ballots to be sent out and returned. It is not possible to estimate the extent to which this was the case.

Seven in ten (69%) electoral administrators said postal votes reaching electors in time was one of the top three concerns which they believe may have impacted their ability to implement Elections Act requirements relating to overseas electors (Post-General Election Survey of Electoral Administrators), although it is not possible to determine the extent to which this was a general concern, or whether this was affected by the new measures.

Qualitative evidence from electoral administrators and overseas electors indicates that there were issues with postal votes being either sent to electors late or received by electors too close to the postal voting deadline to be able to send ballots back in time, and this affected whether overseas electors could cast their vote in time. As noted above, it cannot be stated to what extent the new measures affected this, or whether it would have been an issue anyway.

In terms of quantifying this issue, data from the Electoral Commission indicates that the rate of postal votes returned in time to be counted at the July 2024 UK Parliamentary General Election was lower amongst overseas electors (52%) than amongst domestic postal votes (around 80%). This is particularly important as around half (49%) of overseas electors registered for a postal vote ([Report on the 2024 UK Parliamentary general election and May 2024 elections - Electoral Commission](#)). Data is not available to assess why overseas electors did not return postal votes, for example if they were not able to do so within the timeframes of the pre-election period, or if they decided not to vote.

As stated above, these issues were not a direct result of the new measures, but may have been exacerbated by the time-consuming nature of registering overseas electors applications when they contained errors. Although some qualitative evidence points to this, it is not possible to say the extent to which this was the case.

“When the application comes in they don't take long if they meet all the requirements. But it's when they're more complicated and don't meet those requirements, having to go back and forth... Particularly I think with time aspects with you know someone that lives in Australia, and then having that delay because of that the time period, it can be quite frustrating for them”

(Senior Elections Officer, England)

Additionally, many other external risks were at play, such as low elector understanding of how to register increasing the time it took to process applications.

“I think the biggest impact is they apply and register, but they often get disenfranchised because they can't get a postal vote, and they'll say they can't appoint a proxy because they haven't got anyone in the UK to appoint as a proxy.”

(Head of Electoral Services, England)

Proxy voting

Qualitative findings suggest that another external factor which potentially impacted overseas electors' ability to vote, particularly for newly enfranchised electors who had lived outside the UK for over 15 years, was not having a suitable person to act as a proxy for them.

“My family live in London, I've got friends all over the country but nobody in the town where I used to live 20 odd years ago. That's why I couldn't do it by proxy.”

(Overseas elector, did not vote)

Additionally, overseas electors were not always aware of the possibility of a proxy to cast a postal vote on their behalf (postal proxy).


Some electoral services teams suggested online voting as a potential solution for the issue of returning postal votes in time, or for overseas electors not able to find a suitable proxy, although they did not discuss the wider implications or practicalities of such a policy change.

“If there was online voting, that potentially would put a different emphasis on it. So, while we only have those two options for voting in the UK, there is going to be

issues because a parliamentary election is always going to be in a short time frame.”

(Head of Electoral Services, England)

5.5 Claim 5: Newly enfranchised British citizens living abroad register to vote as overseas electors

	Claim partially met	There is insufficient evidence for this claim, with indications that some newly enfranchised British citizens living abroad electors registered to vote as overseas electors.
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The evidence was low for this claim, and the evidence available was mixed. Although some newly enfranchised electors registered, overall registration numbers for all overseas electors were low. As mentioned in Claim 3, it was not possible to tell what proportion of eligible British citizens living abroad did not register, as the total number of newly enfranchised British citizens living abroad is unknown. Furthermore, findings from Claim 3 suggest British citizens living abroad in general were a hard group to reach through mass communication. This could be especially true of newly enfranchised British citizens who left the United Kingdom over 15 years ago.

It was also not possible to say why newly enfranchised British citizens living abroad who did not register, did not do so, for example this could have been because they were not aware they were now eligible, or were not interested in voting – as mentioned in Claim 3, those who did not register were not captured in the qualitative research. One element of the claim indicates that newly enfranchised British citizens living abroad would not be deterred from registering by the new requirements or processes. Qualitative evidence, and higher rejection rates of this group, suggests newly enfranchised applicants may have been more likely to encounter barriers when registering to vote, e.g. around proving their last UK address, than other overseas applicants. It was possible to conclude the claim was partially met, as there were some indications that newly enfranchised electors did register.

5.5.1 Claim summary

This claim assessed whether newly enfranchised British citizens living abroad who left the UK over 15 years ago registered to vote, providing information as set out in the new legislation; and whether they applied for an absent vote (unless voting in person). This relies in part on Claim 3 ('communications effectively raise awareness of the franchise changes amongst eligible British citizens living abroad') having been met, although it goes

beyond simple awareness to assessing whether newly enfranchised British citizens living abroad took action based on the information provided to them.

Annex 9 sets out the elements from the overseas electors theory of change model that describe the pathway to change. If practical steps were met, the assumption would be that newly enfranchised British citizens living abroad are not deterred from registering by the new requirements or processes, and the electorate would expand to include those who register to vote.

5.5.2 Newly enfranchised overseas electors' registration numbers

It is estimated that 52,390 newly enfranchised overseas applicants applied to register to vote since service 'go-live' (16th January 2024), which represents 31% of all overseas electors' applications (Overseas Electors Monitoring Data). However, it was not possible to identify with certainty if an application was from a newly enfranchised applicant. This estimate was based on the type of application or date recorded as previously registered, and therefore it is possible that the true number of applications was higher or lower. Moreover, as the rejection reason 'cannot confirm UK qualifying address' makes up a larger proportion of rejections of newly enfranchised electors compared to those who were not newly enfranchised (61% vs 24%), it is possible that some applications are re-applications after having an initial attempt rejected (Overseas Electors Monitoring Data). This means the overall number of newly enfranchised applicants may be an overestimate, as if these applicants re-applied with further evidence they would have been counted again. A full explanation of how the estimates were made can be found in Annex 4: Methodology: Quantitative Data Sources, under Newly Enfranchised Overseas Electors.

During the July 2024 General Election period, the proportion of newly enfranchised overseas applications was slightly lower, representing 25% of overseas electors' applications (Overseas Electors Monitoring Data). The higher proportion of newly enfranchised overseas elector applications after service 'go-live' and before the July 2024 General Election period could have been due to the increased interest from newly eligible applicants when the service went live, and indicates that Claim 5 was partly met.

However, as mentioned in Claim 2, there was no surge in overseas elector registration due to the expansion of the franchise to all British citizens living overseas. As registration numbers were low for all overseas electors, it is likely this was due to reasons external to the franchise change. Additionally, it is not possible to know what percentage of the overall population of newly enfranchised British citizens living overseas registered to vote. This is because information is not available around how many British citizens live abroad, or when they left the UK. Although some newly enfranchised electors registered, it cannot be concluded Claim 5 was fully met.

Evidence also showed that different countries in the UK received very different amounts of overseas elector applications, although these differences by nation potentially reflected differences in population size between countries. Table 5.2 below compares:

- the total number of overseas elector applications made between service ‘go-live’ (16th January 2024) up to the application deadline (18th June 2024) (Overseas Electors Monitoring Data);
- the latest national electorate figures (data published by the Office for National Statistics, [December 2023 data published in April 2024](#)). These are based on electorate size in December 2023, and therefore are not an exact match to the July 2024 electorate size.

Overseas applicants represented a slightly smaller proportion of electoral registrations in Scotland and Wales.

Table 5.2 Overseas elector applications and overall electoral registration by country

Country	N. of overseas elector applications (16/01/2024 to 18/06/2024)	Overseas elector applications as % overall electoral registrations (electorate size as of December 2023)
Great Britain (total)	171,749	0.4%
England	156,058	0.4%
Scotland	11,108	0.3%
Wales	4,583	0.2%

In the qualitative research with electoral services teams, it was mentioned that the expected ‘surge’ of overseas applicants did not occur in all areas evenly. In some places, electoral administrators reported a higher number of applications, including from newly enfranchised applicants, while in others, it was much less than expected.

“So when it did finally come, and because it's come at pretty much the same time as the general election, [...] the dams broke and they all came out. There were people – I'd expected the ones who maybe had been abroad 16 years, 17 years, who had gone through the process before of being overseas electors – but people who had never had any contact with our office suddenly just emerged.”

(Electoral Registration Officer, Scotland)

“I would say the electors weren't prepared for it. That was the major issue. People weren't, the reason I say that is because of the volumes we received, it was probably 10 times less than we expected initially. The number of overseas electors we had this parliamentary election, strangely enough, was less than the last parliamentary election, which, with this new system, you'd think no way that's going to be the case.”

(Electoral Services Manager, England)

5.5.3 Delivery of franchise expansion measures

Costs associated with this claim total £4.4 million, covering the process costs for the anticipated higher volume of overseas elector registrations, vote applications, votes, renewals and deletions, and residence checks (resulting from the increased franchise). However, there was also a cost saving of <£0.1 million made due to change in 3-yearly renewals (MHCLG Economic Evaluation Data).

While noting the estimates of newly enfranchised applicants are flawed, as outlined above, newly enfranchised overseas applicants were more likely to see their registration application rejected, with a rejection rate of 15% since service ‘go-live’ (16th January 2024). This is almost twice as frequent than for the overall overseas applicants rejection rates of 8% during the same period (Overseas Electors Monitoring Data). Moreover, 61% of newly enfranchised overseas elector applications were rejected due to the reason ‘cannot confirm qualifying address’ since service ‘go-live’, which is a higher proportion than all overseas elector applications (24%) (Overseas Electors Monitoring Data). As mentioned above, it is possible that some applications were re-applications after having an initial attempt rejected. The estimate that 52,390 applications were from newly enfranchised applicants since service ‘go-live’ may not represent the amount of distinct people applying to be overseas electors.


The fact that more newly enfranchised overseas elector applications were rejected than non-newly enfranchised overseas elector applications due to the reason ‘cannot confirm qualifying address’ also implies that newly enfranchised overseas applicants may have encountered more difficulties in registering than others.

This was reflected in qualitative interviews with electoral services teams and overseas electors. Participants highlighted difficulties experienced by overseas electors who left the UK over 15 years ago in locating past documents proving their address, National Insurance number or electoral registration. This supported the claim being judged as only partially met, as it showed that newly enfranchised overseas applicants could face barriers to registration under the new measures.

“I was a bit worried because I wasn't sure which address I had previously been registered at, because, prior to moving to Spain, I'd been in lots of different places and also different addresses in the UK. So, I wasn't really sure of my last postcode. I kind of had a vague memory of using my mum's address at one stage [...]. So that's the one I used, because I wasn't awfully sure.”

(Overseas elector, voted)

5.6 Claim 6: Overseas electors who want to vote are satisfied with the process of registration

	Claim inconclusive	There is insufficient and mixed evidence for this claim, relying solely on qualitative interviews with overseas electors and electoral services teams.
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Due to insufficient evidence for this claim, it cannot be concluded if ‘overseas electors who want to vote are satisfied with the process of registration’. There was no quantitative data available, since it was not possible to survey overseas electors. The available qualitative evidence was mixed. Electors seemed to be satisfied with the online registration process, when there were no issues. Many were pleased to have been given a voice in the democratic process, especially when living in countries where they did not have the right to vote.

Those who were dissatisfied, however, often spoke of difficulties finding the appropriate documentation to prove their last UK address or confusion about qualifying UK addresses. Participants had mixed views of interacting with electoral services teams, with more negative views if the issue with their application could not be resolved in time to vote. In some instances, this resulted from a combination of the time taken to resolve application issues and challenges which did not relate to the new measures, such as the time taken to receive and send back postal voting papers. The claim was deemed inconclusive, as the available evidence represented the views of a limited number of individuals, and these individuals reported varied experiences.

5.6.1 Claim summary

Claim 6 looks at the extent to which overseas applicants who wanted to vote were satisfied with the process of registration. This expands on findings in Claim 1, ‘local authority staff meet their requirements by law’ and Claim 2, ‘local authority staff workloads are manageable at peak points around the election cycle’, as it seeks to evaluate from an

overseas applicant's perspective whether the requirements were delivered adequately. Claim 6 being met would be expected to influence, in turn, whether levels of public trust and satisfaction with the running of elections are maintained, which is also crucial for Claim 7, 'integrity of overseas elector registration is maintained'.

Annex 9 sets out the elements from the overseas electors theory of change model that describe the pathway to change for Claim 6. If the practical steps of providing digital platforms and services for overseas applicants to register to vote are met, expected outputs are that overseas applicants will register to vote correctly, will have an absent vote arrangement in place, and as a result will be satisfied with the process of registering.

All the costs associated with Claim 6 have been stated under Claim 1 (section 5.1.1).

5.6.2 Elements of satisfaction linked to legislation changes

The available evidence was limited to qualitative interviews with newly enfranchised overseas electors who had submitted a registration application, and therefore is limited in accurately reflecting views of overseas applicants as a whole.

When they did not encounter any issues, overseas electors interviewed reported finding the online registration process relatively straightforward. They mentioned the online system being the most practical way to register and were pleased at the timeframe within which they received confirmation of their registration.

"I'd just like to state that the whole process I found exceedingly simple, straightforward, easy, and as I said earlier, the whole thing was done and dusted within 36 hours. And I found that quite impressive."

(Overseas elector, voted)

There was some qualitative evidence of newly enfranchised electors feeling more connected to the UK, and happy to be involved in the democratic process. Electors who could not vote in the country they resided in were particularly positive about being included in UK General Elections.

"I maintain that I do have a right to vote over there, because otherwise I'm in limbo, because I'm not allowed to vote in France. [...] And I don't know whether at some stage I might return in the future, but I am still British."

(Overseas elector, voted)

Some qualitative evidence pointed to electors feeling satisfied when they were informed in interviews they will be registered for three years instead of one, especially if they were prompted to renew when needed. As mentioned in Claim 3, communications around the

extended registration period were less prominent than communications around the franchise extension. This was reflected in qualitative interviews, where respondents were not always aware of the extended registration period but were satisfied with it once informed.

“I think it's much better because, I mean, and that's a cliché, but time flies anyway. And a year in the life of most people, it just passes in five minutes. So at least three years, you know, it's a useful period of time.”

(Overseas elector, did not vote)

“I imagine, as it's all done online and things, you'd get an email reminder sometime, you know, the three years combined with an email reminder would be perfect, yeah.”

(Overseas elector, did not vote)

5.6.3 Elements of dissatisfaction

Newly enfranchised overseas electors interviewed who managed to vote with no issues mentioned being satisfied overall with the registration process. The issues outlined in this section represent the views of participants who did encounter challenges in the process of registration.

Quantitative evidence suggests overseas applicants were confused about where they last lived or were last registered in the UK. Nearly two-thirds (64%) of previous residency applicants did not know if they had been registered before (Overseas Electors Monitoring Data). Proving one's qualifying UK address is an essential part of the registration process via the residency route, and confusion around this may have impacted applicant's experience of the registration process negatively.

Some mentioned having difficulties finding appropriate documentation proving their last UK address, which aligns with findings laid out in Claim 5 around barriers to registration faced by newly enfranchised overseas electors.

“I then received a message, asking me to prove my former address. That was the most difficult part because I was asked to provide some official type of document and there was a list of the types of documents I could provide which showed my previous UK address. Having left 25 years ago, I found it a bit difficult to find such a paper. I had to spend some time trawling through my filing cabinet and eventually I found a couple of letters from a life insurance company which I submitted as being proof of my original UK address.”

(Overseas elector, voted)

There was low and mixed qualitative evidence around electors interacting with electoral services teams via the phone or email, if there was an error in their application. Some participants viewed this as a positive experience, when the electoral services teams fixed the error, and the process resumed smoothly. Others mention the registration process being slow due to this back-and-forth, especially if the issue with their registration could not be resolved in time.

"I'm not complaining about [local authority], but the time it took to get me back on the electoral roll, then we were really up against it [...] I mean, they replied to my emails [...] this thing about, you know, where did you last live in 1991? Then when that got sorted out and I started the [local authority] story, then they said, no, you're out of time. You're out of the deadline."

(Overseas elector, did not vote)

There were some mentions of the election deadlines feeling very short, with multiple overseas electors mentioning they felt they might not have enough time to register when they started the process.

"It [the deadline to register] was very tight. So, in fact, it probably wasn't a few weeks. It was probably just literally a couple of weeks of that, because it was a snap election. And given the situation in the UK, I wanted to vote."

(Overseas elector, voted)

Qualitative evidence highlighted how some electors wanted to register in a place they felt connected to or had proxy possibilities in, even if this was not their last UK address. This not being a legal option contributed to their dissatisfaction with the process of registering.

"I think that's a detriment because for me, [...] it's a very transient society, the world today, and we all move around for jobs and that. And this is set up as if [...] you live and stay in one town, and you don't move around [...]. And if you did have the opportunity to select different places, if I had one that was near to my parents or my sister, I could get them to do my proxy vote or whatever. But if the system doesn't work like that, it's not flexible enough for today's world, in my view."

(Overseas elector, did not vote)


Qualitative evidence from overseas elector interviews also showed, relating to Claim 4, that those who managed to register but did not manage to vote, due to factors outside of the new measures such as postal, proxy or in person arrangements not working for them, were disappointed with the process. As such, dissatisfaction with the absent voting process potentially affected these overseas electors' views of the overseas registration

process, as the two are tied in electors' minds. The quote below suggests that although the registration process itself was successful, this did not matter as the ballot papers arrived too late, leaving them with a negative impression of the process as a whole.

"[I registered in] June and then, as I said, I got a letter of confirmation in July. The train was on the tracks [...] I was proactive. I could see time was moving on. I contacted the relevant centre. They were helpful, but the reality was that the voting papers only arrived the day before the election, which makes a nonsense of the objective that was trying to be achieved."

(Overseas elector, did not vote)

5.7 Claim 7: Integrity of overseas elector registration is maintained

	Claim partially met	There is insufficient evidence for this claim. Some electors tried to register in the wrong constituency, but the new measures were not seen as a risk to the integrity of elections. There were some mentions of increased trust.
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Evidence pointed to the claim 'integrity of overseas elector registration is maintained' being met, but as evidence is limited, this claim was deemed only partially met. Some electors felt that the more citizens included, the more trustworthy the election. There was evidence of applicants trying to register in the wrong constituency, often due to low awareness or a personal connection there. Some of these seemed to be picked up by registration checks, but it is not possible to know how many were not. Some electoral administrators raised a concern around a lack of coordination across local authorities, which could potentially result in electors successfully registering in multiple constituencies, but there was no quantitative evidence to confirm this was an issue.

Further research would need to be done to draw a conclusion for this claim with confidence. Electoral administrators also suggested that, in the future, improving checks or communication between different local authorities could be useful.

5.7.1 Claim summary

Claim 7 evaluates whether the integrity of overseas elector registration is maintained after implementation of the new measures. This claim partly relies on Claims 1 and 2 being met, as local authorities must fulfil their legislative requirements for the integrity of registration to be maintained. It also depends on Claim 3, around effective communication of the new

measures to British citizens living abroad, as this is a pre-requisite for increased engagement of this group in democratic elections.

Annex 9 sets out the elements from the overseas electors theory of change model that describe the pathway to change for Claim 7. The ultimate long-term consequential change resulting from this claim being met would be maintained levels of public trust, and satisfaction with the running of elections.

All the costs associated with Claim 7 have been stated under Claim 2 (section 5.2.1)

5.7.2 Mixed evidence of applicants registering in the wrong constituency

There was some quantitative evidence that electors registering in the wrong constituency happened on a small scale: of the 13,718 rejected overseas electors applications since 'go-live', only <1% were rejected on the basis of fraud (Overseas Electors Monitoring Data). From the perspective of electoral services teams, registration applications were monitored, and electoral administrators felt errors made by overseas applicants were picked up. However, it is not possible to know how many errors were not picked up.

Qualitative research with electoral services teams showed mixed views on the reasons behind overseas applicants registering in the wrong constituency. When errors with constituency choice were made by overseas applicants and picked up by electoral services teams, some regarded these as errors made in good faith, rather than deliberate attempts to undermine the system.

"It's always been open to some level of abuse. I guess the biggest complication is we found people trying to register as an overseas elector back at their home address, where they perhaps grew up, whereas they'd actually been living in London prior to leaving the country."

(Electoral Services Manager, Wales)

Others mentioned there could be deliberate attempts to undermine the system by overseas electors registering in more than one local authority, although this was raised hypothetically rather than with specific examples. Electoral administrators raised the issue of a lack of coordination across local authorities, which could potentially have resulted in electors being registered in more than one constituency without this being picked up. Some highlighted the need for a joined up, national system which electoral services teams could use to police whether electors were registering in more than one location. As there was no quantitative evidence to support this, more research would need to be done to confirm how widespread this issue might be.

“Yep, because I don’t know that that person isn’t registered on other registers. You could have lived at six addresses and applied to six places.”

(Electoral Services Manager, England)

5.7.3 Low but positive evidence of public trust maintained

Interviews conducted with overseas electors suggested that fraud was not a top-of-mind issue with this audience. Often, participants felt the UK electoral system was safe from fraud.

“It doesn’t concern me at all, electoral fraud, as far as I can make out. If it happens at all, it’s on a minuscule scale.”

(Overseas elector, did not vote)

Qualitative research with overseas electors contained evidence that trust was maintained and they viewed increasing the franchise as positive. The expansion of the franchise to all British Citizens living overseas was seen as a way of including more citizens in the democratic process, therefore making the outcome of elections more trustworthy.

“The more citizens it includes, the more trustworthy it is.”

(Overseas elector, did not vote)

Overall, this claim is judged to be partially met, as there was quantitative evidence that a very small number of fraudulent registration applications were reported. The qualitative evidence is mixed around whether these fraudulent applications were due to errors made in good faith or deliberate attempts to undermine the system. It is not possible to know if many fraudulent applications were made without being picked up, and there were mentions by electoral services teams that an overarching system to check whether electors were registered in more than one local authority would be useful. More research would be needed to investigate how widespread this issue was. The low qualitative evidence available pointed to maintained levels of public trust and satisfaction with the running of elections, although more widespread research with overseas electors would be needed to confirm this.

6 Digital Imprints

The Elections Act 2022 requires those promoting digital campaigning material in scope of the rules (and any person on behalf of whom the material is being promoted) targeted at the UK electorate to include a digital imprint with their name and address. The requirement for digital imprints aims to empower electors to know who is promoting political material online and on whose behalf.

The regime defines ‘electronic material’ as material in an electronic form which consists of or includes:

- text or moving or still images (for example social media posts, pictures, digital posters/leaflets, memes, videos, slide shows or GIFS); or
- speech or music (for example podcasts).

The regime is split into two parts: paid-for electronic material (i.e., electronic material which has been paid to be advertised) and other electronic material. These two parts have different ‘purpose tests’ and apply to different actors. The paid-for material side has a much broader application than the other electronic material side, reflecting the potentially wider reach of paid-for electronic advertising compared to other electronic material. Other electronic material (i.e. material that has not been paid to be advertised also known as ‘organic’ digital material) has a more limited scope to ensure proportionate regulation of public debate.






The enforcement authorities for the digital imprints regime are the police and the Electoral Commission. Whether it is the police or the Electoral Commission that is initially responsible depends on the purpose of the material in question. Within the police, it is generally Single Point of Contact (SPOC) officers that deal with these offences. Elections SPOCs exist within each of the 43 police force areas in England and Wales, with responsibility during elections for liaising with the Electoral Commission, handling intelligence analysis and dissemination, and supporting with complaints relating to elections offences. The police are supported by the National Police Coordination Centre, which provides a central co-ordination function for UK policing including on electoral offences.

The theory of change presented in Annex 10, Figure A.10.1 sets out the process of implementation of the digital imprints requirements.

This evaluation is designed to assess whether digital imprints requirements were implemented as intended, and produced the intended effects, as set out in the theory of change model. A total of five claims were identified from the model, detailing the key pathways between processes and effects. The extent to which these claims had been met was then assessed based on the available evidence.

Table 6.1 presents these claims and conclusions made against each. In the subsections that follow, evidence collected to either support or challenge whether each claim has been met, is presented.

Table 6.1 Overview of digital imprints contribution claims and conclusions

Claim title	Claim met?	Claim outcome	Claim conclusion
Claim 1: Police and the Electoral Commission fulfil their responsibilities as enforcing bodies under the new requirement consistently.		Claim met	Evidence demonstrates a consistent approach and appropriate use of powers to ensure compliance with the requirements, across both the Police and the Electoral Commission.
Claim 2: Non-compliant materials are found, reported, investigated and sanctioned as appropriate.		Claim met	There is strong evidence that non-compliant materials are found, reported, investigated and sanctioned as appropriate.
Claim 3: Campaigners are aware of the new requirement and comply with the requirements of the law.		Claim partially met	Evidence suggests campaigners were aware of the new requirement, but lacked understanding, leading to a lack of compliance in the first instance.
Claim 4: Digital imprints allow the Electoral Commission to better enforce spending rules.		Inconclusive	There is no evidence that supports or denies the claim that digital imprints allow the Electoral Commission to better enforce spending rules.
Claim 5: Public perceptions of transparency and integrity around political campaigning are maintained or improved.		Inconclusive	The evidence demonstrates that public perceptions around political campaigning have not been improved, and there is no evidence to support or deny that they have been maintained.

6.1 Claim 1: Police and the Electoral Commission fulfil their responsibilities as enforcing bodies under the new requirement consistently

	Claim met	There is sufficient evidence to demonstrate that the police and Electoral Commission staff consistently enforced the digital imprint rules.
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Evidence was sufficiently consistent and strong to support the conclusion that the claim ‘Police and the Electoral Commission fulfil their responsibilities as enforcing bodies under the new requirement consistently’, has been met.

Although there were some initial concerns around the delineation of roles and responsibilities, the evidence shows a consistent approach to enforcement was adopted both across and within police forces and the Electoral Commission. This approach focused on advice and guidance and demonstrated an appropriate and effective use of the police and Electoral Commission’s powers, with no cases requiring direct enforcement action; and clearly resulted in high levels of compliance among campaigners.

Despite this, the Electoral Commission officials were concerned that the SPOCs lacked a clear understanding of the requirements. The evidence suggests that additional training for SPOCs on these requirements might be beneficial. This could help to improve internal processes, supporting clarity around roles and responsibilities, and establishing clear lines of escalation for cases where there is uncertainty.

Electoral Commission officials also felt they faced limitations due to a lack of resource, preventing them from following up with cases of non-compliant digital political materials. However, it is important to note that the responsibility for assessing resource needs and requesting adequate funding sits with the Electoral Commission themselves. Wider changes for SPOCs and the Electoral Commission may also result in more efficient ways of working.

6.1.1 Claim summary

Claim 1 aims to examine the extent to which police and the Electoral Commission fulfilled their responsibilities consistently in line with the new requirements. This is a critical step in ensuring and promoting compliance with the digital imprints requirements.

The theory of change assumes that the police and the Electoral Commission receive sufficient training and guidance, monitor compliance, and open investigations where required. It was expected that the police and Electoral Commission then use their powers appropriately to ensure non-compliant digital materials are removed or modified. A consequential change of these activities and outputs is that the police and the Electoral Commission feel confident in the guidance and enforcement requirements and are able to apply them consistently.

Annex 10 sets out the elements from digital imprints theory of change that describe the pathway to change for Claim 1.

6.1.2 Preparedness for implementation

Within the qualitative research there was limited evidence of the police and the Electoral Commission receiving training on the digital imprints requirements. SPOCs mentioned attending a training session delivered by the Electoral Commission online, noting that this session covered the scope of the new requirements, such as what constitutes non-compliance. An Electoral Commission official also expressed confidence that training had been given to police, but was unsure on its detail.

No Electoral Commission officials that were interviewed received any training themselves on the requirements (having been heavily involved in the design of the measures). However, they reported that training had been delivered to other teams in the Electoral Commission ahead of the July 2024 UK Parliamentary General Election.

In terms of guidance, Electoral Commission officials reported that statutory guidance, produced by the Electoral Commission, set out their roles and responsibilities alongside that of the police. SPOCs also said they were sent this guidance by the Electoral Commission and were signposted to the Electoral Commission's website for detail on the legislation.

Although SPOCs generally found the guidance and legislation to be clear and easy to read, they identified a lack of clarity on their specific responsibilities as a limitation. For example, they felt the guidance could have been clearer in setting out the processes to follow where a crossover in responsibility between the police and Electoral Commission occurred.

One Electoral Commission official also expressed concern that SPOCs did not have a comprehensive understanding of the requirements. They reported that the Electoral Commission had conducted a survey of SPOCs following the July 2024 General Election to understand how they felt about the new requirements. They felt that some of the responses demonstrated a lack of clarity around the measures.

"We asked SPOCs about how they found the imprints requirement, and sort of how to ensure compliance with it after the campaign, and I think a lot of them struggled with it. [...] there were lots of questions in the survey responses about kind of basic things, such as whether it applies to social media, which is the only thing it mainly applies to."

(Electoral Commission Official)

Given this confusion remained after the July 2024 General Election, this may suggest that SPOCs were not enforcing the rules as expected under the new requirement.

6.1.3 Enforcement of the digital imprints requirements at the July 2024 UK Parliamentary General Election

Despite concerns around roles and responsibilities, the qualitative research demonstrated the police and Electoral Commission had a consistent approach to enforcing the requirement. Both SPOCs and Electoral Commission officials focused on notifying those in breach of the requirements that their digital political material was non-compliant, advising them on the new rules and how to amend their digital political material to comply, or requesting they remove the material. No cases were required to go any further than this, and no investigations or sanctions were reported.

“Anything imprint-wise we often treat with words of advice and education, and to sort of upskill the person so they don't commit the offence again. So that's our initial approach. It's not something we've ever progressed to a formal investigation.”

(SPOC)

SPOCs also reported that steps were taken to ensure a consistent approach across all police forces. Weekly meetings were held with SPOCs across police forces, run by the lead force. These meetings focused on all electoral offences (such as personation, the handling of postal voting documents by political campaigners, and exceeding proxy voting limits) and were used to update colleagues on approaches that had been taken across different cases. This ensured a consistent and proportional approach was applied across forces.

Electoral Commission officials reported the statutory guidance as an important enabler in supporting them to deliver their requirements, particularly around establishing roles and responsibilities. It was also useful in supporting the Electoral Commission to explain why they had taken a certain action in relation to a non-compliant digital political material. However, as previously stated, SPOCs felt this guidance lacked clarity in establishing their own responsibilities.

Reports of non-compliant digital political material were made through a centralised portal managed by the Electoral Commission, that Electoral Commission officials found to be helpful. Officials felt that all reports being submitted in the same format, using the same form and being stored in one place made it easier to review, triage and coordinate responses in a consistent manner. SPOCs and officers from the National Police Coordination Centre felt their overall approach to ensuring compliance with the requirements supported delivery, but no specific enablers were mentioned.

In terms of challenges in implementing the requirements, an Electoral Commission official reported a lack of resource. As a result, providing initial advice and guidance to individuals that had been reported as in breach of the requirements was prioritised, with following up with these cases deprioritised. Instead, an approach for follow ups was applied sporadically, but specifics on this were not provided. This is discussed in more detail within Claim 2. They were also unable to respond to individuals submitting reports of non-compliant digital political material, either to update them on the outcome, or inform them that they had misunderstood what constituted a breach of the requirements.

This lack of follow-up caused some issues, as many of these allegations were incorrect, and multiple submissions came in from the same people who continued incorrectly reporting compliant material. An Electoral Commission official felt that this negatively impacted on their efficiency as they were still required to look into these reports, which took time. Whilst extra resource to respond to these individuals could have potentially reduced the number received, wider changes by the Electoral Commission may also facilitate a more efficient approach.

“The lack of resources really showed in that we couldn’t respond to the people who were making the complaints, and actually that would have been helpful. I think it would have been valuable because a lot of it was candidates reporting on each other. So, you did have a lot of reports of non-compliance, it was just, they were just misunderstanding.”

(Electoral Commission Official)

No barriers to implementation relating directly to digital imprints were mentioned by National Police Coordination Centre officers or SPOCs in the qualitative research. However, participants spoke more broadly about the impact the nature of elections and political culture can have on their role. For example, they said candidates sometimes raise politically motivated questions about the compliance of other candidates and parties with the police. One person described this as ‘political finger pointing’, and participants in general said this made policing elections different, and more complex, than other areas of law enforcement.

In a survey of SPOCs following the July 2024 General Election, SPOCs said they experienced several issues. These related to the number of reports received, and uncertainty about how to interpret the legislation when responding to reports ([Electoral Commission’s report on the July 2024 UK Parliamentary General Election](#)).

In the survey, SPOCs also said they would like more information and guidance about digital imprints, including about their application to social media ([Electoral Commission’s report on the July 2024 UK Parliamentary General Election](#)). Overall, these findings were

not strongly evidenced within the qualitative research, so specific information on what elements would benefit from further clarity is limited. Whilst these findings do not suggest this claim has not been met, it would be beneficial for SPOCs be consulted further on what information and guidance would be most helpful.

6.2 Claim 2: Non-compliant materials are found, reported, investigated and sanctioned as appropriate

	Claim met	There is sufficient evidence that non-compliant materials were found, reported, investigated and sanctioned as appropriate.
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The evidence concludes that this claim has been met. There is strong evidence that non-compliant digital political materials were found, reported and investigated as appropriate by the police and the Electoral Commission.

The qualitative evidence suggests that the overall approach adopted by the police and the Electoral Commission was appropriate. Whilst these interview participants were involved in the enforcement of these requirements, risking bias, there is consistency across the interviews that supports the validity of these findings.

Due to limited resource, the Electoral Commission focused on providing initial advice and guidance to those in breach of the requirements, with follow ups for these cases being deprioritised and no consistent approach applied.

With no formal investigations being opened and no sanctions issued, there is evidence to suggest that these stronger enforcement levers were not necessary. Of the cases where follow ups were conducted, Electoral Officials noted a high rate of compliance among campaigners after being notified they were in breach of the requirements. No cases of wilful non-compliance were raised during the qualitative research, demonstrating the effectiveness of this approach. However, more could have been done to raise public awareness of how non-compliant digital political materials could be reported to the police and the Electoral Commission.

6.2.1 Claim summary

The theory of change for this claim assumes that the public and campaigners will have reported non-compliant materials. These complaints will then have been investigated and escalated as appropriate, and if done correctly, this would lead to campaigners fixing non-compliant material, and to an increase in the number of digital political material that includes an imprint.

Annex 10 sets out the elements of the digital imprints theory of change that describe the pathway to change for Claim 2.

6.2.2 How the police and the Electoral Commission became aware of non-compliant digital political material

Generally, the police and the Electoral Commission became aware of non-compliant materials following reports from campaigners or the public. The police did not conduct any proactive monitoring of digital imprints, but there is a monitoring team within the Electoral Commission which focuses on campaigning conduct. This team flagged cases of non-compliant digital political materials to the team responsible for triaging these reports via the online portal.

There was some qualitative evidence that non-compliant digital political materials were reported. Electoral Commission officials commented in interviews that the number of reports varied but was consistently at double figures daily. These reports were made through an online form on the Electoral Commission's website, referenced by officials as an 'online portal'. They were sent to a centralised inbox that was monitored by the Electoral Commission where they were reviewed and triaged as appropriate. SPOCs and National Police Coordination Centre Officers did not provide any specific detail on how reports of non-compliant digital political material were made, but said most reports were from campaigners, and reports from the general public were rare.

Within the qualitative research with electors, no evidence indicated electors knew how to report missing imprints to the police or the Electoral Commission. However, it is important to note that electors demonstrated very limited awareness of digital imprints themselves, or the possibility of reporting them. When digital imprints were presented to electors, they were asked whether they knew how to report missing digital imprints. Electors often said they would report it to the social media site they were using via the integrated report function, demonstrating a lack of awareness of the correct reporting channels. One elector had some awareness of the correct reporting channels, but did not think the report would be investigated.

"I thought you could report it to the police, but I would suspect the police wouldn't be that interested."

(Elector, registered to vote by post)

6.2.3 The extent to which non-compliant digital political materials were investigated and sanctioned as appropriate

As discussed within the previous claim, qualitative research indicated that the police and the Electoral Commission adopted a consistent approach to dealing with non-compliant


digital political materials. This approach focused on providing advice and guidance to those in breach of the requirements and no cases progressed to a formal investigation. As previously discussed, Electoral Commission officials reported a lack of resource that meant follow ups for digital imprints were de-prioritised. Despite this, when they did follow-up on non-compliant cases, Electoral Commission officials commented that campaigners were generally compliant with the requirements and were quick to make changes or remove a material when requested.

Electoral Commission officials also mentioned there was an enforcement team within the Electoral Commission, but said they were not required to enforce the digital imprints requirements at the July 2024 General Election. Electoral Commission officials noted that their ultimate aim was to support compliance for a large number of individuals who were experiencing these new requirements for the first time. As a result, they felt it would not be proportionate or a valuable use of resource for this team to conduct enforcement action.

“So, we gave advice and guidance but we didn’t use any of our powers and we didn’t escalate to use them, but what we also found was that in [...] all but two cases, people just did it [what they were advised to do, to meet the digital imprint requirements] straight away.”

(Electoral Commission Official)

6.3 Claim 3: Campaigners are aware of the new requirement and comply with the requirements of the law

	Claim partially met	Evidence suggests campaigners were aware of the new requirement, but lacked understanding, leading to a lack of compliance in the first instance.
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The evidence suggests that this claim has been partially met. Evidence suggests that the Electoral Commission webinars and guidance on the digital imprints requirements had a positive impact in raising campaigner awareness of the requirements, but less so in ensuring their understanding. Whilst the qualitative research demonstrates that campaigners were compliant after being notified they were in breach of the requirements, compliance was still lacking in the first instance. Electoral Commission officials felt this was due to the complexity of the regime and the challenges in supporting campaigners to understand the legislation.

Due to this, the Electoral Commission could, in future, consider different approaches to facilitate campaigner understanding of the digital imprint requirements. This might be by presenting the requirements in a more accessible way, and ensuring the rules for different digital political materials and platforms are clearly communicated. However, for the July 2024 General Election, the digital imprint requirements were new within England, Wales and Northern Ireland, and the election was announced at short notice. As such, political parties had limited time to train their staff diligently on these new rules. Over time, it can be assumed that these processes will improve, and campaigner awareness will increase.

6.3.1 Claim summary

For the digital imprints requirements to achieve their goal of improving or maintaining the transparency and integrity of political campaigning materials, campaigners must be made aware of the requirement and comply with them by law.

The theory of change assumes that campaigners receive training and statutory guidance on the requirements, and that some members of the public may report non-compliance to the Electoral Commission or the police. The outputs and outcomes from this are an increased understanding among campaigners of how to follow the statutory guidance, that campaigners feel supported to comply with the requirements, and that campaigners comply with the legislation by including a digital imprint on political campaigning materials, or fixing or removing those that are non-compliant.

The theory of change specifies that this will lead to the increased transparency and integrity of digital campaigning and online debate. Annex 10 sets out the elements of the digital imprints theory of change that describe the pathway to change for Claim 3.

6.3.2 Campaigner awareness of the digital imprints requirement

Following the July 2024 General Election, the Electoral Commission conducted a survey with candidates to understand their experience of campaigning at July 2024 General Election. Most candidates (86%) that responded to this survey agreed that they understood the requirement to include digital imprints on digital political material ([Electoral Commission's report on the 2024 UK Parliamentary general election and the May 2024 elections](#)).

According to qualitative research, the Electoral Commission delivered webinars for campaigners that focused specifically on digital imprints to raise general awareness. These included an explanation of the new requirements and how to ensure compliance, along with time for questions. The digital imprints requirements were also covered within webinars on election spending, and one-to-one discussions were held when requested.

“We did loads of webinars for different types of stakeholders, certainly parties, non-party campaigners and candidates.”

(Electoral Commission Official)

“The webinars were the training, and the team also had one-to-ones with some of the campaigners who were seeking it.”

(Electoral Commission Official)

In addition to this, the Electoral Commission signposted campaigners to guidance on their website that included step-by-step instructions on complying with the requirements. This guidance was disseminated via multiple channels, such as the Parliamentary Parties Panel who then distributed it to elected office holders and candidates.

6.3.3 Campaigner compliance with the digital imprints requirement

In a survey delivered by the Electoral Commission, over two thirds (69%) of candidates that responded felt it was easy to meet the digital imprint requirements ([Electoral Commission’s report on the 2024 UK Parliamentary general election and the May 2024 elections](#)).

Despite this high level of self-reported awareness and understanding among candidates, Electoral Commission officials and SPOCs in the qualitative research indicated low compliance among campaigners more generally with digital political material promoted earlier on in the election campaign. They felt this was due to a lack of awareness around the requirements. However, as previously mentioned, in cases mentioned by participants, campaigners were quick to remove or amend any non-compliant digital political materials notified they were in breach of the rules.

“It [non-compliance] didn’t feel very intentional in the most part, it felt [like] low understanding.”

(Electoral Commission Official)

“So, it seems to me, or in my experience, the political parties have yet to catch up [with the digital imprint requirement].”

(SPOC)

Electoral Commission officials also mentioned misinterpretation of the requirements among campaigners. One reported that supporting campaigners to understand the rules

was challenging due to their complexity. They referenced the different requirements for paid advertisements and organic political material.

“So we would then have to say, now your post is an organic post and therefore it has this test for whether it needs an imprint, if you boost it on Facebook, it becomes a paid ad and then it has this different test, and [...] it's fairly difficult to explain that.”


(Electoral Commission Official)

Another Electoral Commission official felt the guidance being platform or application neutral affected compliance. This meant campaigners had to do additional research to learn what was allowed within individual platforms, creating more opportunities for accidental non-compliance.

“Well, they found it sort of difficult to comply, I think partly because the guidance is sort of written to be platform neutral, and you kind of have to read into what's technically feasible on the platforms.”

(Electoral Commission Official)

6.4 Claim 4: Digital imprints allow the Electoral Commission to better enforce spending rules

	Claim inconclusive	There is no evidence that supports or denies the claim that digital imprints allow the Electoral Commission to better enforce spending rules.
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There is no evidence that supports or denies the claim that ‘digital imprints allow the Electoral Commission to better enforce spending rules’, and as such the claim is inconclusive. After the Electoral Commission have received the spending returns of regulated entities, it may be possible to evaluate this claim, but no conclusion can be reached at this point.

6.4.1 Claim summary

For this claim to be realised, it is assumed that campaigners receive training and guidance on the requirement, and the Electoral Commission use digital imprints as an evidence source when investigating the accuracy of spending returns of regulated entities (e.g., candidates, third party campaigners, political parties) during the regulated period.

As campaigners become aware of the requirement and include digital imprints on digital political materials, the Electoral Commission will be able to better evaluate spending

returns after an election or referendum. This will ultimately lead to better enforcement of spending rules due to increased transparency around paid-for advertising by campaigners.

Annex 10 sets out the elements of the digital imprints theory of change that describe the pathway to change for Claim 4.

6.4.2 Awareness of digital Imprints being used to better enforce spending rules

No Electoral Commission officials in the qualitative interviews had any awareness of digital imprints being used to investigate the accuracy of spending returns. At the point of interview, Electoral Commission officials had not received the spending returns from regulated entities, which is likely why they were unable to comment on this claim.

6.5 Claim 5: Public perceptions of transparency and integrity around political campaigning are maintained or improved

?	Claim inconclusive	The evidence demonstrates that public perceptions around political campaigning have not been improved, and there is no evidence to support or deny that they have been maintained.
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Overall, the evidence supporting the conclusion that the claim ‘public perceptions of transparency and integrity around political campaigning are maintained or improved’ was inconclusive.

Survey evidence demonstrates a lack of certainty among voting age adults in Great Britain and Northern Ireland in being able to identify the person promoting a digital campaigning material. However, this is likely due to many factors outside of digital imprints’ sphere of influence, and cannot be solely attributed to the requirements. In qualitative interviews, electors expressed a distrust of political campaigning materials and concern around fake social media accounts and the doctoring of images. Whilst electors appreciated the intention behind digital imprints, they do not feel they go far enough to deal with these issues.

6.5.1 Claim summary

This claim assesses the impact that digital imprints have had on public perceptions of the transparency and integrity of political campaigning. It is closely connected to Claims 2 and 3, that is, assuming that non-compliant digital political materials are found, reported, investigated and sanctioned as appropriate, and that campaigners are aware of and comply with the new rules.

The resulting impacts should be increased transparency and integrity around these materials and improved public perceptions of elections and politics. Electors should also be empowered to make informed decisions about the material they view online.

Annex 10 sets out the elements of the digital imprints theory of change that describe the pathway to change for Claim 5.

6.5.2 Public perceptions of the transparency and integrity of political campaigning materials

As previously discussed within Claim 2, electors within the qualitative research demonstrated low awareness of digital imprints after being presented with examples. In addition to this, survey data indicates there was a lack of certainty among voting age adults in being able to identify the person who is promoting digital campaigning material. In Great Britain, 31% of voting age adults were very or fairly certain in being able to identify the person who promoted digital campaign material, with 39% either not very or not at all certain (Public Opinion Survey 2024).

While these survey findings are helpful in demonstrating this low certainty among voting age adults, it is important to note that no such question was asked in previous iterations of the Public Opinion Survey, and therefore no baseline established. As a result, causality cannot be drawn between public perceptions of the transparency and integrity of political campaigning and the introduction of digital imprints.

As the proportion of respondents feeling uncertain is relatively high (although still the minority), more may need to be done to support voting age adults to be able to identify the person promoting digital campaigning material.

Despite digital imprint requirements being in place within Scotland since the 2014 independence referendum, there was a slightly weaker degree of certainty in being able to identify the promoter among voting age adults in Scotland (24% very or fairly certain, 44% not very or at all certain). This certainty was also slightly lower in Northern Ireland compared to Great Britain, with 26% very or fairly certain, and 41% not very or at all certain (Public Opinion Survey 2024).

Feedback from the qualitative research suggested a reason for this lack of certainty was a general distrust of political campaigning materials among electors. For example, electors expressed a lack of trust in the motivations of political parties and concerns around the reliability of some political campaigning material. Electors also commonly reported concerns about fake accounts on social media, and the ease with which images or materials could be doctored, making it difficult to verify their legitimacy.

"I tend to skip past it a little now because what they put out a lot of the times now, [...] isn't what happens after the election."

(Elector, low socioeconomic background)

"I don't trust any form of communication, whether through the letterbox or, on any social media, and I'm fascinated that you said [...] the imprint by law has to be put in there, but there's nothing about the facts of what they say."

(Elector, older (over 65))

"I think a lot of people don't take what they see, like those sorts of campaign materials, at face value anyway. There's always some sort of different agenda behind it no matter who it comes from."

(Elector, younger (18-29))

6.5.3 Impact of digital imprints on the transparency and integrity of political campaigning

Overall, the qualitative research suggested digital imprints have had a limited impact on public perceptions of transparency and integrity of political campaigning. Within the qualitative research, when presented with examples of digital imprints, electors supported their introduction, but felt they did not go far enough. As previously mentioned, electors were concerned by the ease with which images could be doctored, and felt this applied to digital imprints too. As a result, most electors did not feel that their introduction would increase the transparency and integrity of political campaigning.

"I wouldn't trust that anymore just because it's got a water type, like a watermark on it, because you could easily photoshop that to say something else easily. So, to me, it's still just an image."

(Elector, low socioeconomic background)

However, electors raised that it would give them a greater level of trust than digital political material that did not have an imprint, as more information was provided that could potentially be used to verify the source.

"I think it's really important to know where things have come from and who's putting them out there, and I generally operate like that with anything I use on the internet or any other social media. So, yeah, if it's going to be a bit more transparent about where it's come from, I think that will be helpful."

(Elector, registered to vote by post)

Despite the Electoral Commission being involved in proposing, developing and the designing of digital imprints, Electoral Commission officials themselves also questioned the extent to which digital imprints improve transparency. For example, one felt the information that imprints must include, specifically a postal address, felt archaic and did not improve transparency. However, it is worth noting that the inclusion of the postal address is not necessarily intended to improve transparency, rather to support the Electoral Commission with enforcement activities.

Another commented the lack of a requirement for candidates to state their association with a political party, and only needing to provide their own or their agent's name, is unlikely to improve transparency. This was not felt to be helpful for electors who may not know the name of the candidate, but may know the name of the party.

“For me it sometimes feels ridiculous that you have, for example, the ‘Blue Party’ website and it says this is for the ‘Blue Party’, we’re all about the ‘Blue Party’ [...] and then, because the imprint at the bottom doesn’t say a postal address, it’s not compliant, but it is clearly transparent.”

(Electoral Commission Official)

As previously noted, electors had low awareness of the digital imprints requirements prior to participating in the qualitative research. Electors reported they had not noticed them previously, and when shown examples, commented on the presentation of the imprints, feeling they were small and intentionally discreet. Electors questioned the extent to which the public would take the time to look for a digital imprint, and felt more could be done to make them stand out. From an accessibility point of view, electors mentioned that the text was very small, making it difficult to read.

“It’s also, I mean, just from an accessibility point [of view], you know, the text and the size of the writing [on the digital imprint] is so small that, you know, some people wouldn’t be able to read it easily.”

(Elector, older (over 65))

“You know, if there’s no rules specifically saying where it [the digital imprint] needs to be, realistically, they’re always going to be in tiny, tiny text.”

(Elector, ethnic minority)

It is worth noting that the digital imprint requirement does include rules regarding the legibility of the imprint, although these electors were presented with compliant digital imprint materials as examples and still felt the writing to be small.

7 Conclusion

7.1 Overall delivery of the Electoral Integrity Programme

Overall, the July 2024 UK Parliamentary General Election was well-run, with the evidence across all measures evaluated demonstrating that responsible parties fulfilled their responsibilities and met the requirements of the law. Furthermore, the vast majority of electoral services teams and (where relevant) polling station staff felt well prepared and confident in delivering the new requirements.

One of the consistent strengths across the Electoral Integrity Programme (EIP) leading to this confidence and successful delivery was effective training and guidance provided to electoral service teams and polling station staff. The Association of Electoral Administrators (AEA)'s training and the Electoral Commission's guidance have been essential in preparing staff to implement new measures and ensuring compliance with requirements by law.

Overall, electoral services teams reported feeling well prepared and able to deliver the requirements. However, a recurring theme of increased workloads was raised by electoral services teams in response to the introduction of the new measures and requirements. In particular, this related to ensuring voter identification, postal and proxy voting, and overseas electors requirements were met for the July 2024 General Election. However, it's important to note that this increased workload was an expected outcome of the introduction of these new requirements, and New Burdens funding was allocated to resource these. Whilst local authorities managed to meet these demands, it was common for electoral administrators to comment on how busy they were during the pre-election period, and the time-consuming nature of some processes, such as verifying overseas elector applications. Despite these workload increases being anticipated, and New Burdens funding being allocated to provide support, electoral services teams reported feeling a general sense of overwhelm.

Additionally, the short notice with which the July 2024 General Election was called meant that delivery staff felt they would have done more to prepare had there been time available. Electoral services teams would have liked to use more time to: familiarise themselves more with the Electoral Registration Officer Portal (ERO Portal); engage with guidance and training materials; and engage with disabled electors and groups representing them to raise awareness about the new accessibility measures.

After some initial teething issues, electoral services teams were generally positive about the functionality of the ERO Portal and their familiarity with it. This suggests that use of the

Portal moving forward will be smoother as its functionality improves and staff become more accustomed to its use. However, there was a call for greater interaction between the Electoral Management Systems (noting that each LA has its own Electoral Management System and there are multiple systems providers) and the ERO Portal to improve working efficiencies, for example by removing issues whereby electors registration information did not match across the two. There were also calls to improve the ERO Portal to allow electoral administrators to easily track the status of different applications and correspondence with electors. This would help streamline the process for local authorities and ensure efficiency during the busiest postal vote application periods. To note, this functionality has been added since the July 2024 General Election.

For measures which have involved new or adjusted processes for electors (for example, VAC or absent voting applications, and overseas electors' registrations), there is evidence that some electors have found these processes cumbersome and difficult to navigate. Ultimately, as electoral administrators were usually able to provide support, these difficulties did not tend to affect an elector's ability to vote.

Raising awareness among electors about new measures has also been a challenge. Despite a range of communication activities, there remains a significant portion of the electorate that is unaware of specific requirements, such as what constitutes accepted photographic identification to vote with (some electors were turned away due to presenting incorrect forms of identification, and there was confusion about the use of expired identification), the availability of Voter Authority Certificates (VACs) for those without accepted photographic identification, the changes to absent voting legislation (although high use of the online application service indicates electors successfully used this service, even if not consciously aware of the change), and how to report materials which do not comply with digital imprints requirements. This lack of awareness sometimes led to confusion and non-compliance, underscoring the need for more targeted and effective communication strategies.

7.2 Recommendations

The evaluation has produced a number of recommendations for future delivery.

7.2.1 Reducing workload and improving efficiency

To improve workload and efficiency for electoral services teams, polling station staff and SPOCs:

- MHCLG could review guidance available to electors when applying for absent voting and overseas electors to see if this could be made clearer. For example, making the requirement to be registered to vote before applying for an absent vote clearer;
- Relatedly, MHCLG could consider ways to improve interactions between the Electoral Management Systems and the ERO Portal, and improve functionality within the ERO Portal;
- MHCLG could explore the feasibility of an automated system to check proxy limits within and across local authorities;
- On digital imprints, the Electoral Commission and the College of Policing could consider additional training for police Single Point of Contact (SPOCs) on these requirements. This could improve clarity around roles and responsibilities, including clear lines of escalation for cases where there is uncertainty on progressing cases (whether to escalate, who to escalate to) and where compliance has been breached. The Electoral Commission may also require additional resource to manage and escalate reports, as they receive most reports of non-compliance.

7.2.2 Raising awareness and understanding

To address some of the current gaps in awareness and understanding:

- The Electoral Commission and electoral administrators could better highlight (both ahead of polling day and within polling stations) what types of identification documents are and are not accepted;
- The Electoral Commission and electoral administrators could better emphasise the options available for those without valid photographic identification (such as VACs, out-of-date identification documents and postal voting), and raise awareness of VACs in a way that stands out from the voter identification requirements;
- Relevant organisations (for example, local authorities and civil society organisations) could conduct more engagement activities with individuals more likely to need a VAC, and community organisations supporting these individuals (this could be encouraged by sharing examples of good practice where community engagement has been effective in raising awareness);
- Electoral administrators could better highlight the availability of privacy provisions within polling stations, for those who might wish to show their identification document in private but are unaware of this provision;
- For accessibility measures, the Electoral Commission could consider a national communications campaign to raise awareness amongst electors who may require support to help them vote in person;

- For postal voting, electoral administrators and MHCLG could better raise awareness of the time electors can expect to wait before receiving their postal vote;
- The Electoral Commission could consider providing further support to improve campaigner understanding of the digital imprint requirements, such as more clearly presenting the requirements and supporting campaigners to understand the rules for different digital political materials and platforms;
- The Electoral Commission could raise elector awareness of the requirement for digital imprints and their purpose;
- To improve efficiencies for overseas elector registration, MHCLG could explore what is driving the confusion among electors, and if anything could be changed to improve their understanding of which constituency to apply in.
- The Electoral Commission and College of Policing could consult with SPOCs to understand how to improve guidance and confidence in delivering digital imprints requirements.

7.2.3 Evidence building

To address current gaps in evidence, and allow more claims to be conclusively assessed, MHCLG could:

- Continue to monitor the claim that voter identification checks will have reduced personation when longer-term data on the prevalence of personation becomes available from the Electoral Commission's monitoring data, by comparing data before and after the introduction of the voter identification measures. However, it should be noted that other factors could influence rates over time, this will only account for cases reported and investigated, and it will not account for those deterred from offending;
- Consider methods to collect further evidence to establish whether extra identification verification during applications for postal and proxy votes contributed to the security of elections;
- Conduct further assessment of claims currently considered 'inconclusive' because of the current evaluation's timescales being shorter than the likely timescales needed for many impacts to come to fruition;
- Gather data from campaigners on measures that affect them, for example, awareness and understanding of postal vote handling limits and digital imprint requirements;
- Assess the extent to which digital imprints allow the Electoral Commission to better enforce spending rules, once spending returns have been submitted and necessary investigations conducted.