Representation of the People Bill

Written Evidence to the Bill Committee from the Electoral Reform Society

March 2026

Part One: Young Voters

Automatic voter registration, improved voter engagement and democratic education can help make votes at 16 a major moment of democratic change and renewal in the UK.

Research has shown that the younger people are engaged in voting, the more likely they are to carry on voting later in their lives.[1] Votes at 16 enables younger voters to be better supported through their first experience of voting - whilst they are at home and in education. It is the relationship between learning about voting and putting it into practice that creates the opportunity for wider democratic benefits, helping improve participation in the longer-term.

There is also some evidence to suggest that inequalities in participation are reduced. In Scotland, newly enfranchised young people of all social groups were equally likely to be politically engaged.[2] In Wales, gender gaps in perceived political knowledge (seen in all other age groups) were not present amongst 16- and 17-year-olds.[3]

Votes at 16 should be complemented by quality democratic education. Democratic education can provide younger voters with the confidence, efficacy and interest to get involved in politics whilst gaining the right to vote increases young people's desire to learn about political issues. Together this creates a moment to engage the next generation in democracy.

Recommendations

It is vital that modernisations to voter registration are made to ensure that young people (who are the least likely to be registered) do not miss out, and that they are supported with early awareness and information campaigns. The introduction of votes at 16 in Wales (though made particularly challenging due to the pandemic) provides lessons for the UK on the importance of early interventions on awareness, registration and mobilisation.[4] In particular, the process of informing and engaging young people, getting them registered to vote, connecting them to the information they need to feel confident to make a choice, and the procedural knowledge to go and vote takes considerable time and must start early on.[5]

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[1] Huebner, C., and Eichhorn, J., '*Evidence and Good Practice on Lowering the Voting Age to 16*'. https://www.jrrt.org.uk/wp-content/uploads/2025/01/Votes-at-16-report-FINAL.pdf

[2] Huebner, C. & Eichhorn, J. (2022). *The Tide Raising all Boats? Social Class Differences in Political Participation among Young People in Scotland*. Scottish Affairs, 31(2), 165-189.

[3] Griffiths, J. D., Larner, J., Wyn Jones, R., & Poole, E. G., (2025) '*A False Start: Votes-at-16 in Wales in the 2021 Senedd Cymru election',* Wales Governance Centre.

[4] Huebner, C., Smith, K. A., Mycock, A., Loughran, T., & Eichhorn, J. (2021). '*Making Votes-at-16 Work in Wales. Lessons for the Future'* (pp. 1–34). Nottingham: Nottingham Trent University. https://www.ntu.ac.uk/media/documents/nce/Huebner-et-al_2021_Making-Votes-at-16-work-in-Wales.pdf

[5] Ibid.

Part 2 – Registration of Voters

Registration without application has great potential to improve voter registration and ensure that every eligible voter can participate. But it is essential that progress is made quickly to establish pilots and move to registration without application so that at the next General Election millions do not miss out.

Most countries use a form of automatic registration[6] and changes to the annual canvass in the UK, made in 2019, have already moved the UK's system closer to automatic registration with EROs using data-matching as an integral part of the registration process and re-registering those who can be reliably matched.[7]

The pilots of automatic registration in Wales have shown how much it can improve completeness of the registers (even when restricted to local data).[8]

In 2025, three Welsh councils piloted automatic voter registration (a fourth council tested just data-matching to see whether the electoral register could be re-created from local data). The pilots identified and automatically registered 14,500 new electors. This represents between 2% and 8% of the registers in these areas (Gwynedd 8%, Powys 5%, Newport 2%). The pilots were particularly successful in registering attainers. Between 16% and 37% of attainers were added in Gwynedd and Powys.[9]

The pilots were able to utilise local data such as council tax and housing records to match residents (but no national data). The Carmarthenshire pilot, which looked at re-creating electoral rolls, found that 60% of existing electors can be matched on local data.

The Electoral Commission review of the pilots found, in initial assessments, that AVR did not negatively affect the accuracy of the registers and there were few concerns raised from those in the pilot areas.[10] According to the Electoral Commission, the subsequent November canvass in 2025 removed only 17 voters in Powys and 66 in Gwynedd. The EC reports finds that, 'From the evidence available, nearly all of these additions to the register appear accurate, i.e. the register entries relate to a person living at that address.'[11] International evidence shows that AVR increases both accuracy and completeness.[12]

Constituency boundaries are currently drawn according to registered voters. Ensuring the electoral register is as complete as possible by rolling out registration without application and other

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[6] Toby. S. James and Paul Bernal (2020) Is it time for Automatic Voter Registration in the UK? Joseph Rowntree Reform Trust: York. https://www.jrrt.org.uk/wp-content/uploads/2020/04/Is_it_time_for_AVR_in_the_UK.pdf

[7] **In 2019, changes to the annual canvass were made introducing automatic re-registration.**[7] **The annual canvass now begins with a data-matching step (against both national (DWP) and local data). If a registration can be reliably matched, the ERO will communicate with the resident but, if that information is correct, a response from the resident is not necessary in order for them to remain on the register (it remains an offence to fail to notify of a change or provide false information). The ERO does not need to send a reminder or chase a response (this is called 'route one').**

[8] Electoral Commission, '*Automatic registration pilots evaluation*', 2025. Available at: https://www.electoralcommission.org.uk/research-reports-and-data/electoral-registration-research/automatic-registration-pilots-evaluation

[9] Ibid.

[10] Ibid.

[11] Ibid.

[12] James, T. S., & Garnett, H. A. (2024). The Determinants of Electoral Registration Quality: A Cross-National Analysis. *Representation*, 60(2), 279–302. https://doi.org/10.1080/00344893.2023.2207194

modernisations to improve completeness (such as assisted registration) is therefore also important for achieving accurate constituency equalisation as set out in the Parliamentary Constituencies Act 2020.

Part 3 – Conduct of Elections

s47 - Voter identification requirements

The introduction of photographic ID in the Elections Act 2022 has, to date, prevented over 42,000 people casting their vote.[13] Improvements to prevent any more eligible voters losing their right to vote are essential, but we will only know if these improvements are working if we have records of who has been turned away at the polling station.

The Elections Act 2022 requires reporting on the effects of voter identification for the subsequent two General Elections.[14] As a result, after two sets of council elections and a General Election, data is not currently being collected, and the next General Election will be the last election in which returning officers are legally required to collect statistics on who is turned away at the polling station. Expansion in the range of IDs is very welcome but needs careful monitoring and assessment.

The voter ID scheme introduced in the Elections Act 2022 is highly restrictive compared to other countries that do not have a national ID card.[15] Only a restricted list of photographic IDs are deemed acceptable and there are no alternatives for voters who turn up without ID.

Increasing the range of acceptable identity documents, including non-photographic ID, would make the scheme more proportional. The Cabinet Office report 'Securing the ballot', which first suggested introducing ID, recommended that: *'There is no need to be over elaborate; measures should enhance public confidence and be proportional.'[16]* That report suggested options including bank cards, signatures or date of birth checks.

When voter ID was first introduced in Northern Ireland non-photographic IDs were accepted and elections took place for almost 20 years with this less stringent requirement. Allowing IDs like bank cards and digital ID, which voters are likely to be carrying on them, will help voters who do not have access to the others accepted forms of ID and make it easier for all voters on the day.

Another option would be to allow poll cards to be used as ID. In the 2018 Voter ID pilots, areas which allowed poll cards to be used as identification, along with other forms of photo ID, recorded the lowest percentages of voters not returning with correct ID (Swindon 0.06% and 0.2% Watford). In Swindon, 95% of voters produced their poll card instead of another form of ID, 87% in Watford. Similarly, the poll card pilots in 2019 recorded lower percentages of voters being turned away than the photo ID or mixed

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[13] **The Electoral Commission reported that in the 2024 General Election around 16,000 electors attempted, but were unable to vote due to the Voter ID requirement; this equates to 1 in every 1,200 voters.[13] Similarly, the May 2024 local and mayoral elections reported around 13,000 electors attempted to vote but were turned away because they lacked accepted ID and did not return; in the May 2023 local elections this figure was around 14,000.**

[14] Elections Act 2022, schedule 1, para 7.

[15] **Even the US states with the strictest photo ID laws allow for provisional ballots to be cast and later verified.** National Conference of State Legislatures, "*Voter ID laws*", 2024. Available at: https://www.ncsl.org/elections-and-campaigns/voter-id#Table%201

[16] Cabinet Office, '*Securing the Ballot: review into electoral fraud*', 2016. https://www.gov.uk/government/publications/securing-the-ballot-review-into-electoral-fraud

ID models. In the poll card pilots (Mid Sussex, NW Leicestershire, Watford) 93% of voters produced a poll card instead of an alternative form of ID.[17]

Changes to accepted ID is unlikely to affect the security of the scheme given that personation was not a widespread issue before ID cards were introduced. Out of all alleged cases of electoral fraud in the 2019 elections, only 33 related to personation fraud at the polling station[18] – this comprises 0.000057% of the over 58 million votes cast in all the elections that took place that year. Only one of those allegations resulted in a conviction, and one a caution.[19] The government assessment in 2023 notes that there were just two allegations of personation at the May 2023 elections which is 'consistent' with previous elections – before the introduction of the ID scheme.[20] In 2024 there were seven allegations of polling station personation (none led to prosecution).[21] The 2023 government report also concluded that the evidence is 'inconclusive' on whether the scheme has reduced personation or made it more easily identifiable.[22]

Evidence from the Electoral Commission suggests that some groups were more likely to have a problem voting due to the voter ID requirement than others at the 2024 General Election. Specifically, those in the C2DE social grade - 8% of C2DE non-voters when prompted said they didn't vote because they didn't have required ID in comparison to 3% of ABC1 voters. The same research also showed that in comparison to the general population, voter ID created more of a barrier to voting for disabled people and unemployed people.[23] This is echoed in the 2023 Electoral Commission survey which showed that unemployed and disabled non-voters were more likely to say that they didn't vote because they didn't have ID, and that young people and people from black and minority ethnic communities were more likely to have not been able to vote because they turned up without ID.[24]

Recommendations

It is critical that the impact of voter ID is monitored and reported to ensure that we have a full picture of how this policy is affecting voters and whether further changes are needed.

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[17] Electoral Commission evaluation reports 2018 and 2019 available at:
https://www.electoralcommission.org.uk/research-reports-and-data/may-2018-voter-identification-pilot-schemes/impact-voters
https://www.electoralcommission.org.uk/research-reports-and-data/may-2019-voter-identification-pilot-schemes/2-impact-voters-experience
[18] Uberoi and Johnstone, "*Political disengagement in the UK: Who is disengaged?",* Ho,use of Commons Library, 2022. Available at: https://researchbriefings.files.parliament.uk/documents/CBP-7501/CBP-7501.pdf
[19] Electoral Commission, "*2019 Electoral Fraud Data*", 2020. Available at:
https://www.electoralcommission.org.uk/research-reports-and-data/electoral-fraud-data/2019-electoral-fraud-data
[20] Dept for Levelling Up, Housing and Communities, "*Electoral Integrity Programme evaluation: year 1 report*", 2023. Available at: https://www.gov.uk/government/publications/evaluation-of-the-electoral-integrity-programme-year-1-report
[21] Electoral Commission, Electoral Fraud data https://www.electoralcommission.org.uk/2024-electoral-fraud-data
[22] Dept for Levelling Up, Housing and Communities, "*Electoral Integrity Programme evaluation: year 1 report*", 2023. Available at: https://www.gov.uk/government/publications/evaluation-of-the-electoral-integrity-programme-year-1-report
[23] Electoral Commission, "*Voter ID at the 2024 UK general election*", 2024. Available at:
https://www.electoralcommission.org.uk/research-reports-and-data/our-reports-and-data-past-elections-and-referendums/voter-id-2024-uk-general-election
[24] Electoral Commission, "*Voter ID at the May 2023 local elections in England: interim analysis*", 2023. Available at: https://www.electoralcommission.org.uk/research-reports-and-data/our-reports-and-data-past-elections-and-referendums/voter-id-may-2023-local-elections-england-interim-analysis

In particular, continued monitoring and evaluation of the Voter ID scheme will be essential in understanding whether and how changes to accepted IDs is helping those who have been particularly disadvantaged by the scheme to date.

The cross-party Democracy and the Constitution APPG inquiry on Voter ID highlights that there is currently no immediate right to appeal for those who have been denied a ballot and no options for voters on the day.[25] Options to increase on-the-day accessibility include:

- **Vouching**

Vouching is used in some US states and in Canada. The vouching system allows for another voter, who has ID, to vouch for someone who doesn't. The person vouching for someone else signs an affidavit which means there is a paper trail should any irregularities need to be investigated. The House of Lords Constitution Committee recommended vouching (attestation) in their inquiry.[26] The Electoral Commission has also recommended the introduction of vouching.[27]

- **Statutory declarations**

Measures to allow voters to cast provisional ballots or sign an affidavit attesting to their identity are common in countries requiring voter ID. Even the US states with the strictest photo ID laws allow for provisional ballots to be cast and later verified.[28] The Democracy and the Constitution APPG report recommended allowing voters to 'cure' any failure to produce the required documentation by making a statutory declaration on the day of the poll.

Part 4 – Campaigns and Political Donations

s58-s62 – Control of political donations

It is vital that we provide greater protection from foreign interference and corruption, and importantly, provide voters with more reason to feel confident that their voices matter.

s60 – donations by companies: The risk of shell companies being used to funnel foreign funds into UK politics was first identified as a risk prior to PPERA.[29] It is therefore very welcome that this bill seeks to address this vulnerability by requiring donor companies to demonstrate they have made sufficient funds in the UK and have a UK connection. However, a UK profit test (instead of revenue), as

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[25] Institute for Constitutional and Democratic Research, "Voter ID – what went wrong and how to fix it: *An Inquiry into the impact of photographic identification requirements at the 2023 local elections"*, 2023. Available at: https://www.icdr.co.uk/voter-id-inquiry

[26] House of Lords Constitution Committee, "*Voter ID requirements should be made more accessible ahead of elections, says Lords committee"*, 19 December 2023. Available at: https://www.parliament.uk/business/lords/media-centre/house-of-lords-media-notices/2023/december-2023/voter-id-requirements-should-be-made-more-accessible-ahead-of-elections-says-lords-committee/

[27] Electoral Commission, "*Voter ID at the 2024 UK general election"*, 2024. Available at: https://www.electoralcommission.org.uk/research-reports-and-data/our-reports-and-data-past-elections-and-referendums/voter-id-2024-uk-general-election

[28] National Conference of State Legislatures, "*Voter ID laws"*, 2024. Available at: https://www.ncsl.org/elections-and-campaigns/voter-id#Table%201

[29] Committee on Standards in Public Life, fifth report, 'The Funding of Political Parties in the United Kingdom', 1998. Available at: https://assets.publishing.service.gov.uk/media/5a7daa32e5274a5eaea6596a/5thInquiry_FullReport.pdf

recommended by the Committee on Standards in Public Life and Electoral Commission, would provide stronger protection in this regard.

s62 - Unincorporated Associations: Donations from Unincorporated Associations (UAs) present a well-documented gap in the UK's political finance transparency requirements.

It is welcome that this bill seeks to address these issues introducing permissibility checks, increasing reporting requirements and lowering the contribution thresholds for triggering reporting, as well as extending the rules to candidate donations. However, at £11,180, the threshold for triggering reporting is high.

S63-s64 – Information to be included with electronic material

Imprints can provide voters with basic information about the source of what they see and an indication of whether what they are viewing is campaign advertising. This can be useful in helping voters identify 'native advertising' techniques where ads are made to look like journalism or individual posts providing voters with a way to spot content designed to sway their opinion.[30] Imprints enable voters to know if the material is designed and promoted to influence the outcome of an election.

However, there are limitations to what imprints reveal to voters about the source of the content they see. Campaign material may have partisan or financial links which are not revealed by the imprint (even if it complies with the rules). For imprints, the 'source' is the organisation or person directly responsible for placing/distributing the material, but this source information does not necessarily reveal other affiliations, partisan goals or financial backers.

Imprints also cannot tell voters about the veracity of the claims they see online and nor can they prove the trustworthiness of the campaigner – only that the campaigner has complied with the electoral law in this area. For third parties who are registered with the Electoral Commission, the imprint would signify that the organisation is subject to further disclosure requirements on donations and spending, and would also provide voters with a route to finding out more about those campaigns via the Electoral Commission. This further monitoring may provide a shortcut to establishing a level of trustworthiness for voters (though this would require voters to have knowledge of campaign regulations) but would not apply in the case of unregistered campaigns.

Imprints cannot deal with wider issues of disinformation and the potential for electoral information incidents for which much wider measures are needed.[31]

Recommendations

An online ad repository or 'library' would assist with improving transparency around digital campaigning. This would allow both the public and regulators to view ads across all platforms and help to identify campaigns that are designed to mislead their audience.

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[30] Electoral Reform Society, Gordon, H., *'Digital imprints: what are they and why are they useful?'* https://electoral-reform.org.uk/digital-imprints-what-are-they-and-why-are-they-useful/

[31] See for example Electoral Reform Society*, 'Democracy in the Dark: Digital Campaigning in the 2019 General Election and Beyond',* 2020. Available at: https://electoral-reform.org.uk/latest-news-and-research/publications/democracy-in-the-dark-digital-campaigning-in-the-2019-general-election-and-beyond/#sub-section-5 and, DEMOS, 'Epistemic Security Briefing', 2026. Available at: https://demos.co.uk/wp-content/uploads/2026/01/Epistemic-Security-Brieifing_The-Elections-bill_2026.pdf

Part 5 – Enforcement and the Electoral Commission

We strongly welcome the Secretary of State's commitment to repeal provisions made in the Elections Act 2022 which give the government powers to set a strategy and policy statement for the Electoral Commission.

Maintaining the independence of the Electoral Commission is vital and could be further strengthened by ensuring that the Speaker's Committee remains cross-party. This could be further improved by inviting ordinary 'lay' members of the public to join the committee (much like parliament's Standards Committee has done) and preventing any party having a majority on the committee.

Amendments and other issues

Voting system (NC1)

The last General Election was not only the most disproportional election in British electoral history but one of the most disproportional seen anywhere in the world.[32] That situation could get worse at the next general election as our electoral system struggles to cope with the new reality of five and six-party politics.

First Past the Post is an electoral system designed for a two-party system. When more parties are in contention, as is the case when voters spread their choices across multiple parties, the winner's share of the vote is often reduced. As a result, winning candidates regularly get across the line with less than a majority of votes and occasionally, less than a third of constituency support. Many more seats are seeing more than two parties get sizable vote shares, which, under FPTP, reduces the eventual mandate for the winning candidate.

Multi-party politics is showing no sign of retreat. The Projected National Share (PNS) calculations from the May 2025 English local elections showed five parties getting over 10% of the vote.[33] A YouGov MRP in June 2025 predicted a General Election in which record numbers of seats return winners with small proportions of the vote – 143 constituencies are won on less than 30% in their analysis.[34]

Multi-party politics under FPTP – a system designed for two party competition – is always going to lead to odd and unpredictable electoral outcomes. As the electoral landscape continues to shift, we are likely to see ever more disproportional results. Changing the voting system at Westminster is now an urgent issue.

Donations limits

Over time, both the total amount of donations and the number of very large donations (those over £1 million) from private sources have increased. The extent to which parties are reliant on a handful of very wealthy donors is recognised by the public and is a cause for concern. YouGov finds that 60% of people think that wealthy donors give money to gain influence compared to the 6% who this it is driven by

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[32] Electoral Reform Society, A system out of step
[33] BBC https://www.bbc.co.uk/news/articles/cd925jk27k0o
[34] YouGov, June 2025, MRP. https://yougov.co.uk/politics/articles/52437-first-yougov-mrp-since-2024-election-shows-a-hung-parliament-with-reform-uk-as-largest-party

support for the party. [35] Only 13% of people think that there should be no limits on how much people can give in political donations. [36]

In 2011 the Committee on Standards in Public Life produced a report addressing the problems of an increased reliance on significant donations and recommending a donations cap. [37] Since that report, the key problems the committee identified have intensified. The funding of our politics is too reliant on too few, and the sums involved are simply too large. Reducing the amount that single private sources can give to parties not only helps create a fair democratic contest but also protects parties and their representatives.

Around 49% of countries globally and 71% of European countries impose limits on donations (non-election specific periods). [38] A donations cap would prevent a small number of wealthy donors dominating political finance and would reduce corruption risk.

[35] YouGov, 23 September 2024, 4046 GB adults: '*Do you think that wealthy people make donations to individual politicians more because they support them and want them and their party to succeed, or more because they are trying to gain influence?*' https://yougov.co.uk/topics/politics/survey-results/daily/2024/09/23/a132c/1

[36] YouGov, biannual tracker at 29 December 2025, 1668 - 1804 GB Adults: '*Should there be a limit of donations made to political parties by individuals?*'
 https://yougov.co.uk/topics/politics/trackers/should-there-be-a-limit-of-donations-made-to-political-parties-by-individuals

[37] Committee on Standards in Public Life, thirteenth report, '*Political Party Finance: ending the big donor culture*', 2011. Available at: https://www.gov.uk/government/publications/political-party-finance-ending-the-big-donor-culture

[38] International IDEA political finance database: https://www.idea.int/data-tools/data/political-finance-database