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Written Evidence to the Public Bill Committee: Representation of the People Bill

I am Professor of Politics and Public Policy at the University of East Anglia and the co-Director of the Electoral Integrity Project. The Electoral Integrity Project is a world leading academic project which produces innovative and policy-relevant research comparing elections worldwide. I have worked extensively on voter registration reforms over the past twenty years and co-authored reports including Getting the Missing Millions Back on the Electoral Register (2016), Is it Time for Automatic Voter Registration in the UK? (2020), Improving Voter Registration: A Guide to Introducing Automatic Voter Registration (2025) and Towards Automatic Voter Registration: Lessons from Canada and Australia (2026). I am submitting evidence in a personal capacity in response to the committee's call for evidence on the Representation of the People Bill.

The Bill proposes historic changes which will strengthen UK democracy and elections. However, this is an opportunity to further strengthen them through amendments. This evidence proposes that amendments are introduced to:

1. Set a timetable for the introduction of automatic voter registration to be in place before the next general election.
2. Abolish the open register to protect elections from interference.
3. Monitor access to the full electoral register to prevent interference.
4. Require electoral registration officers to publish electoral data to create a more informed electorate.
5. Enable vouching for those without voter ID at polling stations to strengthen security and participation.
6. Extend the franchise to all residents for Parliamentary and/or local elections to create an inclusive democracy.
7. Restore Electoral Commission independence to strengthen trust in elections.

Automatic voter registration will improve completeness and accuracy

The Bill proposes to move the UK towards adopting automatic voter registration. There were concerns raised that this could negatively affect the accuracy of the electoral register. Our research, studying 159 countries, demonstrates that automatic voter registration systems *improve **both** the completeness and accuracy of the electoral*

register.[1] It is therefore an indispensable reform to strengthen the integrity and inclusion of UK elections.

Context

The Electoral Commission has estimated that there are potentially as many as 8 million people missing or incorrectly registered from the electoral rolls for Westminster and local elections.[2]

Inaccurate and incomplete registers can prevent many people from voting. Research shows that one of the most common problems at polling stations is unregistered electors being turned away. This problem has increased over time. At the 2015 general election, 69% of poll workers reported turning people away because they were not registered.[3] This increased to 80% at the 2024 general election – with most poll workers turning away 2-5 people each. In some isolated cases, poll workers reported turning away over 100 people in their polling station.

The system of voter registration used can directly affect levels of completeness and accuracy. There are three different systems used to register electors around the world:

- Individual registration – where it is an individual responsibility to register themselves.
- Assisted registration – where it is an individual responsibility, but public bodies assist voter registration
- Automatic voter registration – where public bodies register electors without them needing to take any action.

Our analysis of the voter registration system used in 159 countries shows that automatic voter registration generates the most accurate and complete registers.[4] A further factor is the capacity and resource of the electoral officials. Many countries which do not have assisted or automatic voter registration have experienced the problem of declining completeness rates and have therefore moved to adopt assisted or automatic voter registration.[5]

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[1] Toby S. James and Holly Ann Garnett. 2024. "The Determinants of Electoral Registration Quality: A Cross-National Analysis." *Representation* 60 (2): 279–302. doi:10.1080/00344893.2023.2207194.
[2] https://www.electoralcommission.org.uk/research-reports-and-data/electoral-registration-research/2023-report-electoral-registers-uk
[3] Alistair Clark and Toby S. James (2017) 'Poll Workers' in Pippa Norris and Alesandro Nai (eds), Watchdog Elections: Transparency, Accountability, Compliance and Integrity. Oxford and New York: Oxford University Press.
[4] Toby S. James, and Holly Ann Garnett. 2024. "The Determinants of Electoral Registration Quality: A Cross-National Analysis." *Representation* 60 (2): 279–302. doi:10.1080/00344893.2023.2207194.
[5] Sonali Campion, Toby S. James & Holly Ann Garnett (2026) 'Towards Automatic Voter Registration: Lessons from Canada and Australia' UK Democracy Fund: London

The UK currently has an individual system for voter registration. This was introduced in 2014, prior to which, it was undertaken on a household basis. The move to an individual system had some advantages but led to major declines in the number of people registered – with young people the most affected.[6]

We have previously estimated that providing citizens with an option to register to vote/update their registration details when accessing other government services would enable millions of citizens to register more easily. For example:

- 6.5 million per year could register when applying for a passport
- 4 million people could register when they update their driving licence address with the DVLA
- 2 million a year could register when applying for Universal Credit
- 2.5 million students could be registered through annual student enrolment
- 800,000 could register when they apply for child benefit for the first time
- 500,000 could register when they provide the Student Loans Company with a new address
- 450,000 could register when they apply for disability benefits

We have argued that automatically registering voters at the point at which they interact with these government agencies would improve completeness and accuracy. The data provided at these points would be more recent and accurate than that provided at the point of applying to register to vote. Assisted and automatic voter registration would therefore strengthen completeness and accuracy.

The Bill will:

- give Electoral Registration Officers (EROs) the power to register electors without them having made an application – in effect enabling automatic voter registration. Furthermore, it places a duty on Electoral Registration Officers to notify eligible but unregistered citizens.
- enable pilots to take place which could be used to test innovative approaches to registration, including more automated approaches as technology and data use develops.
- facilitate EROs' access to data held by the relevant local authority and other public bodies, to enable them to compile the register.

These are essential legislative amendments to enable automatic and assisted voter registration to be implemented. In so doing, they stand to enable a new system which would look set to strengthen voter registration accuracy and completeness. This would

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[6] Toby S. James (2020) *Comparative Electoral Management* (Routledge: London and New York).

significantly strengthen the inclusiveness of the system, reduce opportunities for fraud and strengthen democracy.

Missing timetable

The Bill is currently missing a timetable for the introduction of automatic or assisted voter registration. There are no dates in place for any pilots. Secondary legislation is not yet available. Approaching two years since coming into office, there is little sign of urgency to address the problem of people missing from the electoral register. It may have been possible for the government to have undertaken and published reports evaluating the suitability of different public data sources during this time. However, no such work has been published. This is reducing the opportunity to strengthen voter turnout at the next general election.

Our research has shown how Australia and Canada were successful in introducing assisted and automatic voter registration. Despite the complexity of their respective systems, both countries were able to establish the foundations for their assisted/direct enrolment and update systems within 18 months, demonstrating that it is possible to establish an automated register in a relatively limited time frame.[7]

It is proposed that the Bill is amended to include:

- A requirement to hold pilots within 12 months of the passage of the Act
- A requirement for the Secretary of State to report annually to Parliament on the pilots.
- A requirement for the Secretary of State to report annually on the accuracy and completeness of the register.

The government could also publish details of existing work undertaken.

The open register risks foreign interference

Electoral data should be considered as a key part of UK security infrastructure. It contains the key information needed to administer the election. It also includes personal data and information which could be used by external actors to bring about external interference in the electoral process.

The open register is a copy of the electoral register which is publicly available for *anyone* to purchase. Electors can opt out of having their name published on the register. The Bill proposes a change to make inclusion opt-in.

The open register serves no purpose for the running of the election. Moreover, it presents a major security risk for the integrity of the election. Overseas actors could purchase the data and compile it into a single dataset for malign purposes. This could

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[7] Sonali Campion, Toby S. James & Holly Ann Garnett (2026) 'Towards Automatic Voter Registration: Lessons from Canada and Australia' UK Democracy Fund: London

be combined with data purchased via the dark web. It would then be possible to identify marginal constituencies and micro-target voters with postal misinformation. This could be to discourage them from voting – or to vote for specific parties and candidates.

The range of actors who use the open register is ultimately unknown and it is not monitored. Our research has suggested that it is individual citizens who seek to access the registers the most.

The universal availability of the edited/open register to anyone has privacy implications. People may not be fully aware of the implications of their choice not to be removed from the edited register, so their choice not to opt out is unlikely to be a genuinely informed choice.

The Bill should therefore be revised to *abolish the open register* (and edited register in Northern Ireland).

Access to full electoral register should be tightened

The full electoral register is the complete list of registered electors which is used for the purpose of the election. However, it is also made available to a range of public bodies, political parties and private organisations. This data sharing plays an important role in the public interest.   For example, it allows elected representatives to reach their constituents – and parties to campaign at election time. It allows public bodies to plan and law enforcement to operate. It also allows credit reference agencies to operate – thereby supporting the wider economy.

However, there are major gaps in the monitoring of the use of the full electoral register.

There is also no effective control of what those who receive the registers do with that data, nor any rules about what they can do with the data. One solution to this could be to require those who receive the registers to provide an annual report on how they have been using the data. These annual reports would form part of the information used to monitor the use of election data.

There is no single national electoral register for electoral officials. However, a 'shadow register' can be constructed by purchasing different registers and patching them together. This could potentially be 'sold on' or used by actors seeking to disrupt the electoral system.

An amendment should be added to the Bill which:
- Specifies that the full electoral register can only be used for specific purposes, which is limited to the public interest. These would be:
    - electoral officials for the purposes of running the election

- o elected representatives for the purposes of providing representation (but only for their respective area)
- o governmental bodies for the purposes of organising elections (ONS, Boundary Commissions)
- o civil society groups seeking to promote participation via the Electoral Commission
- o the Electoral Commission for the purposes of statistical research
- o academics for the purposes of academic research via the Electoral Commission
- o credit reference agencies for the purposes of credit reference checking
- o crime and law enforcement agencies for the purpose of prevention and detection of crime
- o Jury Central Summoning Bureau for the purpose of identifying jurors
- o Libraries for the purpose of historical archiving
- Require recipients to sign declarations for how they will use the data
- Requires EROs to collate these recipients and provide data to the Electoral Commission on electoral register usage
- The Electoral Commission to publish an annual report on electoral register usage

Citizens should have better electoral data

Electoral data also provides an essential role for informing citizens about the electoral process. Past results, information about candidates and polling stations, for example, are all essential for them to be able to make their decision. The system for managing electoral data, however, is Victorian and not fit for the twenty-first century. [8] Key information is not collated centrally which leads to citizens being less informed than they could be.

There is untapped data potential where electoral data could be used to support citizens to be better informed, for electoral institutions to be much more transparent and for a wide range of actors (including regulators, media, and civil society) to leverage data to promote participation in elections.

Astonishingly, there is no central source of information on local election results, for example. It has therefore been left for academics, civil society groups and election enthusiasts to gather basic information about elections.

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[8] Toby S. James and Paul Bernal (2023) The UK Electoral Data Democratic Deficit: A vision for digital modernisation, Joseph Rowntree Reform Trust: York, with Paul Bernal.

This information exists in the form of spreadsheets inside the offices of local EROs and ROs. A simple amendment could require them to provide this information to the Electoral Commission:

An amendment could therefore be introduced to:

1. Establish statutory requirements for Electoral Registration Officers to publish data on parliamentary and local elections in England and Northern Ireland on:

    a. The number of people who accessed the marked register and for what purpose.

    b. Expenditure undertaken to boost voter registration.

    c. The number of overseas voters registered

2. Establish statutory requirements for Returning Officers to publish data on parliamentary and local elections in England and Northern Ireland on:

    a. Names of candidates

    b. Polling station locations

    c. The results of elections

    d. The number of rejected ballots

    e. The number of postal votes received

    f. The number of proxy votes received

    g. The number of overseas votes received

    h. The number of people turned away because they did not have voter identification

    i. The number of complaints received from the public

3. The data covered in 1) and 2) should be published in a common format and timetable as set by the Electoral Commission

4. The Electoral Commission should publish the combined data in a timely manner.

Vouching at polling stations will provide security and ensure participation

The Elections Act 2022 introduced the requirement to show photographic ID when voting in person in non-devolved UK elections or referendums held in Great Britain. A wide body of research shows that many electors do not have this identification available to them. Our research has shown that many people have been turned away at polling stations since voter identification requirements were first piloted and then rolled

out in local elections and the 2024 general election.[9] Table 1 demonstrates using data from poll workers. Around 78% of poll workers turned away at least one voter at the 2024 general election because they did not have identification. This was a substantial increase on the pilots and the rollout in local elections.

Cases and suspected cases of personation are exceptionally rare. Table 1 summarises data from poll worker surveys undertaken since 2015. The percentage of poll workers that suspect cases of personation is very small – and has increased since voter identification requirements were brought in. A survey of 14,600 poll workers at the 2024 general election found that 98.8% thought that there had been no personation – but this was similar (and slightly lower) than in previous elections. In short, there is little evidence that personation is a problem.

%	People being turned away because they did not have the appropriate identification				Suspected cases of personation				
	Pilots	*2023*	*2024 local*	*2024 GE*	2015	*Pilots*	*2023*	*2024 local*	*2024 GE*
None	47.6	29.5	28.5	22.4	99.1	99.3	99.2	99.3	98.8
1	22.2	29.5	23.4	20.9	0.9	0.6	0.7	0.5	1.0
2-5	24.5	35.4	4.4	33.0	0.0	0.1	0.1	0.1	0.2
6-10	4.3	3.6	1.1	4.4	0.0	0.0	0.0	0.0	0.0
10+	1.3	1.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Table 1: Frequencies of personation and cases of citizens not being able to vote because of voter ID. Percentage of all responses shown. Source: adapted from James and Clark (2025).[10]

Poll workers were asked at the 2023 local elections how they thought the electoral experience could be improved.[11] Changing the voter identification requirements was most commonly suggested improvement. It was suggested that either the voter-identification requirements should be scrapped or additional forms of identification should be required. They suggested that student identification, young people's travel cards and gun licences should be added.

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[9] Toby S. James & Alistair Clark (2020) 'Electoral integrity, voter fraud and voter ID in polling stations: lessons from English local elections', Policy Studies, 41:2-3, 190-209. James, Toby S., and Alistair Clark. "The value of poll-worker voice in the delivery of elections", *Policy & Politics* (published online ahead of print 2025).

[10] Toby S. James and Alistair Clark. "The value of poll-worker voice in the delivery of elections", *Policy & Politics* (published online ahead of print 2025).

[11] Toby S. James and Alistair Clark. "The value of poll-worker voice in the delivery of elections", *Policy & Politics* (published online ahead of print 2025).

The Bill proposes to allow the use of non-photographic ID in the form of UK authorised bank cards. This change would most likely significantly reduce the number of people being prevented from voting at polling stations. It is therefore a welcome provision.

An additional solution would be to allow 'vouching'. Elections in Canada have commonly used a 'vouching system.' [12] Voter identification is required, but if a citizen does not have their identification available then they can still vote if they declare their identity and address in writing and have someone who knows them (and who is assigned to their polling station) vouch for them. The person who vouches for the citizen is required to provide their identity and address and can only vouch for one other person. This was previously repealed in Canada but reinstated. This would be a simple and effective way of preventing citizens who do not have voter identification on the day still being able to vote. However, it also ensures that there are some security measures because it leaves a paper trail to enable investigation if there were grounds for suspicion. Approximately 1 per cent of Canadians vote through this mechanism.[13]

It is proposed that an amendment:

- Allows registered electors to sign an affidavit to attest for the identity of an elector who does not have voter identification.
- Expands the range of identification to include student identity and travel passes for young people.

The franchise should be extended to resident adults

The electoral franchise in the UK is complex, confusing and inconsistent. Votes at 16 will harmonise the age at which people can take part in elections. However, there are different nationality requirements. All legally resident citizens can vote in elections to the Scottish Parliamentary Elections and the Welsh Parliamentary election for the Senedd. All legally residents can also vote in Scottish and Welsh local elections. Participation in elections is limited to UK national, qualifying Commonwealth citizens and citizens of the Republic of Northern Ireland. Participation in local elections in Northern Ireland and England is extended to some EU nationals. EU nationals can vote if the UK government has a bilateral agreement with their respective governments – or if they were legally resident before 31 December 2020. These complex arrangements are difficult to administer. They are confusing for citizens, parties and elected representatives.

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[12] Toby S. James 'A Bipartisan Compromise On Voter Identification Is Needed In The Uk. Canada Has A Blueprint', Political Studies Association Blog, https://www.psa.ac.uk/psa/news/bipartisan-compromise-voter-identification-needed-uk-canada-has-blueprint, 13 October 2021.

[13] PWC 'Elections Canada Independent audit report on the performance of the duties and functions of election officers — 44th General Election' https://www.elections.ca/res/rec/eval/pes2021/ege/pes2021-ege_e.pdf p.16, August 2022.

A common slogan throughout the world is 'no taxation without representation'. The basic idea of democracy is that everyone should be able to have a say in the shaping the composition of government whose decisions they are obliged to follow. In an era of conflict, democracy involves listening to everyone to better understand each other.

The Representation of the People Bill is an opportunity to set a clearer, more logical and inclusive definition of the 'people.' The most inclusive option would be extending the franchise for all elections to all legally resident adults over the age of 16. Our research shows that this would enfranchise around 4 million additional people.[14] It has proven to be logistically easy in Scotland and Wales and would foster a more inclusive democracy in which everyone is listened to. During a time of major international upheaval, this would represent a historic opportunity to redefine the UK as a leading democracy.

A first step would be to extend the franchise to all residents for local elections in England and Northern Ireland. This would enfranchise an additional 1.2million people. This would bring the UK in line with international best practices on elections. The Council of Europe, for example, recommended that the right to vote in local elections be granted after a certain period of residence. Member States of the Council of Europe, of which the UK is a member, signed the *Convention on the Participation of Foreigners in Public Life at Local Level* which commits members to the granting of political rights to long-standing foreign residents.

Amendments could therefore:

- Extend the right to vote for all residents at local elections in England and Northern Ireland.
- Extend the right to vote for all residents at parliamentary elections.

Electoral Commission Independence

A key component of democracy is that elections are run independently from the government of the day. Members of the government are a competitor in those elections – so should not interfere in the rules and implementation of those rules. Otherwise, they have opportunity to do so for personal and political gain. Although this convention was not always in place when countries such as the UK initially democratised and the parliamentary systems were established, following the end of the Cold-War, it became standard international best practice to prescribe an independent electoral commission.

The Elections Act 2022 introduced a Strategy and Policy Statement which directly removed the independence of the Electoral Commission. It requires the body to follow

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[14] Toby S. James and Jamie Underwood (2025) What if Everyone Could Vote? Mapping unenfranchised residents across the UK. Migrant Democracy Project. (2025); Toby S. James and Jamie Underwood (2025) 'The new mass unenfranchised? Mapping unenfranchised adults and the case for residence-based voting in the UK', *Political Quarterly*.

the priorities as set out by the government. In effect, it annexes the Commission to act in a role better befitting a government department - which needs to follow the instructions set out by the relevant minister.

The Bill therefore provides the opportunity to repeal this part of the Elections Act 2022 to renew full independence for the Electoral Commission.

An amendment should therefore:

- Repeal sections of the Elections Act 2022 which allow The Secretary of State to designate a Strategy and Policy Statement for the Electoral Commission.

11 March 2026