

Joint Civil Society Evidence Submission

Representation of the People Bill

Submission to the Public Bill Committee

Executive summary

This submission represents a coalition of civil society organisations working across electoral reform, political finance transparency, democratic participation and digital campaigning regulation.

The coalition welcomes the introduction of the Representation of the People Bill, which provides an important opportunity to modernise the UK's electoral framework and strengthen democratic participation.

Members of the coalition particularly welcome provisions in the Bill that:

- Extend the franchise to 16- and 17-year-olds
- Strengthen protections for candidates facing harassment and intimidation
- Tighten aspects of political donation rules

However, the coalition believes **the Bill can be significantly strengthened through targeted amendments.**

Our evidence identifies several areas where improvements are necessary, particularly relating to:

- Automatic voter registration rollout
- Structural weaknesses in political finance rules
- Electoral Commission independence and enforcement powers
- Digital campaign transparency
- Risks associated with cryptocurrency donations

Key amendments Parliament should adopt

Amendment text addressing all of the issues below is available from this coalition

The coalition recommends that Parliament prioritises the following improvements during the Bill's passage:

1. **Automatic voter registration:** Introduce a statutory timetable for nationwide rollout of assisted and automatic voter registration to address the estimated 7–8 million people missing or incorrectly registered.
2. **Strengthening political finance rules:** Place meaningful limits on political donations and spending, replace the current revenue-based test for company donations with a profit-based test and strengthen safeguards against shell companies and foreign influence.
3. **Prohibiting cryptocurrency donations:** Introduce an explicit prohibition on cryptocurrency donations until robust regulatory safeguards and transparency mechanisms are in place.
4. **Further protecting Electoral Commission independence:** Repeal of the ministerial Strategy and Policy Statement power is welcome. Additionally, reform the Speaker's Committee to strengthen independence and ensure enforcement powers are accompanied by institutional independence and adequate resourcing.
5. **Digital campaign transparency:** Introduce stronger requirements for digital political advertising transparency, platform ad libraries and targeting transparency, and disclosure of AI-generated political content.
6. **Ensuring Votes at 16 delivers participation:** Introduce mechanisms to ensure automatic or near-automatic registration of 16–17 year olds, alongside adequate implementation funding and consistent UK-wide delivery.

Amendment text addressing all of the issues below is available from this coalition

Coalition signatories

This submission reflects the views of a coalition of civil society organisations working on democracy, electoral participation, political finance transparency and digital campaigning regulation. Organisations supporting the content of this submission include:

- Unlock Democracy
- 50:50 Parliament
- UK Open Government Network
- Migrant Democracy Project
- Fairness Foundation
- Fair Vote UK
- Radix Big Tent
- Transparency International UK
- Spotlight on Corruption
- UK Anti-Corruption Coalition
- Generation Rent
- Make Votes Matter
- My Life My Say

- Politics in Action
- Electoral Reform Society
- Open Britain
- Compassion in Politics
- 99% Organisation

Note: Organisations may support this submission in whole or in part depending on their specific policy focus.

Introduction

This submission provides evidence from a coalition of civil society organisations working to strengthen democratic participation, transparency and electoral integrity in the United Kingdom.

We welcome the opportunity to contribute to the Public Bill Committee's scrutiny of the Representation of the People Bill.

At a time when democratic systems face growing pressures – including declining trust in institutions, risks relating to political finance and rapid changes in digital campaigning – this legislation provides an important opportunity to modernise the UK's electoral framework.

The coalition welcomes several important reforms in the Bill – particularly the extension of voting rights to 16- and 17-year-olds and stronger protections for candidates – but believes targeted amendments would significantly strengthen the legislation.

Evidence and recommendations

1. Votes at 16

1. What the Bill proposes: The Bill extends the franchise to 16- and 17-year-olds in UK elections.

2. Assessment: Lowering the voting age represents a significant and welcome expansion of democratic participation.

3. Evidence: In Scotland's 2014 independence referendum, turnout among 16–17 year olds was estimated at around 75%, suggesting high engagement when younger voters are enfranchised.²

4. Evidence: Research indicates that voting in a first eligible election is associated with higher likelihood of voting in subsequent elections, supporting the case for earlier enfranchisement to strengthen long-term participation.³

5. Evidence: Under the current registration system, 16–17 year olds are among the least likely groups to be correctly registered.¹

6. Recommendations: Introduce a statutory mechanism to enable automatic or near-automatic registration of 16–17 year olds; guarantee consistent UK-wide implementation and adequate funding; and consider alignment with residence-based voting rights reforms where relevant.

2. Modernising voter registration

7. What the Bill proposes: The Bill enables ‘registration without application’ and provides for pilots and technological exploration to increase automation of voter registration.

8. Evidence: An estimated 7–8 million people are missing or incorrectly registered on the electoral register.¹

9. Evidence: Under-registration is disproportionately concentrated among younger voters and private renters, alongside other historically under-registered groups.¹

10. Evidence: International experience indicates that more automated registration systems can support higher completeness (often reported above 90%) when effectively designed and resourced.

11. Recommendations: Insert a statutory duty to publish a uniform nationwide timetable for rollout at pace of assisted and automatic voter registration with transparent, independent oversight of pilots and equality impact monitoring; commit to a specified date for regulations and adequate resourcing.

3. Voter ID and accessibility

12. What the Bill proposes: The Bill expands accepted ID formats, introduces digital Voter Authority Certificates, and provides for flexible voting pilots.

13. Evidence: The Electoral Commission’s evaluation of the May 2023 local elections found that around 14,000 people were turned away, did not get a ballot paper and did not return.⁴ Additionally, at the 2024 General Election at least 50,000 voters were initially turned away from polling stations due to issues with voter identification. Approximately 34,000 of those individuals later returned and were able to vote, with 16,000 registered voters ultimately did not return and therefore lost the opportunity to cast their ballot.¹⁴

14. Evidence: Voter experience research indicates that barriers linked to voter ID requirements are not evenly distributed and can disproportionately affect some groups (including younger voters and disabled voters).⁵

15. Recommendations: If voter ID remains in place, expand the list of acceptable forms of ID; reinstate monitoring of voters turned away; guarantee non-digital routes for Voter Authority Certificates; embed accessibility safeguards; and require post-implementation review.

4. Political finance

16. What the Bill proposes: The Bill strengthens the 'UK connection' test for company donations and enhances donor checks.

17. Evidence: The UK currently has no cap on the size of political donations, enabling very large contributions in a single reporting period.⁶

18. Evidence: Comparative democracies have introduced donation caps (for example, Canada and France) as a means of limiting undue influence and improving public confidence.⁸⁹

19. Evidence: Analysis by Transparency International UK, Spotlight on Corruption and related organisations has highlighted vulnerabilities associated with company donations, including concerns about shell companies and the adequacy of existing safeguards.⁷ Additionally, only 18 percent of Britons consider political funding to be sufficiently transparent.¹⁵

20. Recommendations: Replace the revenue test for companies with a profit-based test; strengthen ownership and control definitions and anti-evasion safeguards; introduce a meaningful cap on political donations and reduce the national campaign spending limits; and strengthen 'Know Your Donor' provisions in primary legislation.

5. Cryptocurrency donations

21. What the Bill proposes: The Bill references further review but does not prohibit cryptocurrency donations.

22. Evidence: Cryptocurrency donations present significant transparency and enforcement challenges because transaction pathways can obscure the identity, location and source of funds.¹⁰

23. Recommendations: Ensure that donations in cryptocurrency are not permissible donations, at the very least until the Electoral Commission considers it has the appropriate regulation and expertise to regulate their use in political finance, and experts as well as Parliament agrees with that assessment. This could be done via an amendment that requires the Secretary of State to gain the approval of the Electoral Commission, and each House of Parliament via affirmative resolution, that an appropriate regulatory regime is in place before the prohibition can be lifted.

6. Electoral Commission independence and enforcement

24. What the Bill proposes: The Bill signals higher maximum fines (to be set via statutory instrument) and expands Electoral Commission enforcement to candidates.

25. Evidence: Current civil sanction ceilings for electoral offences are widely viewed as comparatively low relative to the scale of campaign spending and the deterrence required for serious breaches.¹³

26. Evidence: By comparison, other UK regulators can impose substantially higher penalties (for example, the ICO's maximum administrative fines under the UK GDPR).¹¹

27. Recommendations: In addition to repealing the ministerial Strategy and Policy Statement power, reform oversight arrangements to strengthen independence; set a maximum fine of £500,000 or 4% of campaign spend (whichever is higher); and strengthen criminal enforcement backstops for serious breaches.

7. Harassment and candidate protection

28. What the Bill proposes: The Bill strengthens sentencing powers and removes home address publication requirements in specified cases.

29. Evidence: Research and commissions on intimidation in public life have documented significant levels of abuse and harassment directed at candidates and elected representatives, with disproportionate impacts reported by women and people from minority backgrounds.¹²

30. Recommendations: Ensure protections are broad enough to address modern harassment patterns (including online abuse); embed practical enforcement and guidance obligations; and consider structured standards of conduct and reporting mechanisms for parties.

8. Electronic campaigning and digital imprints

31. What the Bill proposes: The Bill extends digital imprint rules to certain organic third-party content and centralises enforcement.

32. Evidence: Independent research has highlighted gaps in transparency for online political advertising and targeting, and the limitations of existing voluntary mechanisms.¹³¹⁴

33. Evidence: The growth of generative AI increases risks associated with synthetic political content, creating a need for clear disclosure and accountability mechanisms.

34. Recommendations: Introduce reporting duties for major digital campaign spenders; require platform ad libraries and targeting transparency; and mandate disclosure of AI-generated political content.

Additional areas for reform

35. Civil society organisations have also developed proposals for additional reforms that could be incorporated through amendments, including: establishing a National Commission on Electoral Reform; extending residence-based voting rights; addressing prisoners' voting rights; improving voting access for overseas voters; and considering overseas constituencies.

Conclusion

36. The Representation of the People Bill presents an important opportunity to strengthen democratic participation and electoral integrity in the United Kingdom.

37. While the coalition welcomes several provisions in the Bill, targeted amendments would ensure the legislation fully addresses modern risks relating to political finance, voter participation and digital campaigning.

38. Civil society organisations stand ready to provide amendment text, technical briefings and further evidence to assist Parliament's scrutiny of the Bill.

Footnotes

1. Electoral Commission – Electoral Register Accuracy and Completeness reports (including latest available editions) and related analysis of registration rates by demographic group.
2. Electoral Commission – Report on the Scottish Independence Referendum 2014 (and associated turnout analysis for 16–17 year olds).
3. Institute for Fiscal Studies – research on political participation and the relationship between first-time voting and longer-term turnout.
4. Electoral Commission – Voter ID at the May 2023 local elections in England: administration and voter experience findings (including turned-away and return rates).
5. Electoral Commission – Public opinion / voter experience research relating to voter ID awareness and barriers to participation (as published alongside voter ID evaluations).
6. Electoral Commission – Political party donations and loans data (including large donation records).
7. Transparency International UK – analysis and briefings on political finance vulnerabilities including shell companies and company donation rules (e.g., Checks and Balances and related publications).
8. Government of Canada – Canada Elections Act political financing rules (donation limits).
9. French Government / Ministry sources – political donation limits for parties and candidates (France).
10. National Crime Agency – National Strategic Assessment of Serious and Organised Crime (latest available edition) and related NCA publications on cryptoassets and illicit finance risks.
11. Information Commissioner’s Office – UK GDPR guidance on maximum administrative fines and penalty framework.
12. Jo Cox Foundation – The Jo Cox Commission on the Abuse of MPs (2017) and follow-up research on intimidation and abuse in public life; complemented by Electoral Commission/Parliamentary studies where referenced.
13. Who Targets Me – research outputs on online political advertising transparency in UK elections and referendums.
14. Electoral Reform Society – reports/briefings on digital campaigning transparency and online political advertising in the UK.

15. Electoral Commission - Voter ID at the 2024 General Election Report

16. Electoral Commission - Political attitudes 2025 survey