

The Electoral Reform Society response to the Political and Constitutional Reform Committee call for evidence on the government's proposals on Individual Electoral Registration

September 2011

1. About the Electoral Reform Society.

- 1.1 The Electoral Reform Society was founded in 1884 and has over 100 years of experience and knowledge of democratic processes and institutions.
- 1.2 As an independent campaigning organisation working for a better democracy in the UK we believe voters should be at the heart of British politics. We work across the political divide with other national organisations and local campaigners to improve the health of our democracy and to empower and inform voters. As well campaigning for fair votes and other democratic reforms, the Electoral Reform Society also conducts expert research on electoral systems and outcomes.
- 1.3 More information about our mission and activities can be found on our website at www.electoral-reform.org.uk

2. Summary and recommendations:

- 2.1 The integrity of the electoral process and ensuring every qualified voter is able to cast their vote is the cornerstone of a good democracy. We have long argued that the twin problems of the electoral register – under-registration and inaccurate registration – cannot be tackled in isolation. The Electoral Reform Society, therefore, welcomes the intensions of the government's proposals on Individual Electoral Registration (IER). Although evidence of electoral fraud is quite rare, it is difficult to detect. The system as it currently stands is wide open to fraud as it is based almost entirely on trust. We believe that IER will boost public confidence in the electoral system by increasing the accuracy of the register and reducing the opportunity for fraud.
- 2.2 We also welcome the opportunity to address the issue of eligible voters who are not included on the electoral register. The proposals in the White Paper tackle this issue to some extent, for example data-matching schemes to help Electoral Registration Officers (EROs) locate missing voters. However it is vital to be alive to the impact of IER on registration rates. Concerted efforts will need to be made in order to prevent a catastrophic collapse in registered voters in the run up to the 2015 General Election, and ensure that all eligible voters can have their say in future elections
- 2.3 Recommendations:

- Investigate the possibility of empowering the Electoral Commission to act as the regulator for EROs in order to improve performance, ensure best practice is being followed and increase voter registration across the whole country.
- Improve best practice and information sharing between local authorities and EROs
- The government reconsider the decision to use a transitional carry-over arrangement instead of a national household canvass in 2014.
- The government or a suitable authority investigates the feasibility of Election Day Registration to take advantage of voter interest when it is at its highest and the campaign period reaches its peak.
- The government or a suitable authority investigates the feasibility of making it possible to register to vote in all government offices and Post Offices.
- The reinstatement of an Electoral Participation Fund to assist Electoral Registration Officers with the transition to IER.
- The threat of a fine for not responding to an ERO request information should be retained

3. Overview

3.1 The switch to IER is predicted to result in a serious fall in the number of registered voters. According to the IER Impact Assessment, the gap in completeness in the electoral register as a result of the transition could be as high as 20% (or 7 million voters) which is double the current best estimate of approximately 10%.¹ This is mainly due to the decision not to hold a household canvass in the year that IER will take effect (2014). Instead, all the voters that already have an entry on the register will be invited to register individually, but those who fail to do so will be carried over for one year. As the quality of electoral registers degrades by about 10% over the course of the year (mainly due to population movement) the register will contain many inaccuracies. Combined with the aforementioned 10% estimated gap in the completeness, this means that approximately 20% of eligible voters may not be invited to register individually and could thus be missing from the list in 2014.²

3.2 This figure is devastating in itself, but it does not factor in new electors or anyone wishing to cast a postal or proxy vote in 2015. These voters must register individually under the new system. As registering will involve supplying personal information which some electors may be reluctant to provide, and it will be an entirely personal choice whether or not to register, it is reasonable to expect that the gap could be a lot wider than predicted.

3.3 IER will require greater effort on the part of voters to get on the list. Supplying additional personal information, such as National Insurance numbers, raises the “costs” of voting in terms of both time and effort, which is known to depress

¹ *Individual Electoral Registration Impact Assessment* (June 2011) <http://www.official-documents.gov.uk/document/cm81/8109/8109.pdf>

² Ibid.,

registration levels.³ Those who are already unenthusiastic about voting will be even less likely to bother registering. When Northern Ireland moved over to IER in 2002, the number of registered voters immediately fell by 10%⁴. Although the Electoral Commission puts this down to a reduction in fraudulent and duplicate entries⁵, the fact remains that in 2005 the Northern Ireland authorities were forced to reinstate tens of thousands of electors onto the list who had failed to complete the forms or provide the correct personal information to arrest a significant decline in registration.⁶

- 3.4 Low registration levels are closely associated with low turnout. Low turnout is an issue of deep concern to the Electoral Reform Society because of the damaging effect on legitimacy and accountability, and is a sign of a 'sick democracy'.⁷ Furthermore, there is considerable evidence to show that both voter registration and voter turnout in Britain are unevenly distributed, reflecting the political alienation of certain black and minority ethnic groups (although not others) and young people in particular, who are often identified as having lower levels of participation in the formal democratic process.⁸ Official turnout statistics (based on the registered electorate) hide the true extent of this political dissonance in society. People who aren't registered to vote miss out on opportunities to influence political decisions that affect their lives at both national and local level. Their voices are not heard and their opinions and needs are not addressed.
- 3.5 The White Paper includes some proposals to help assuage the expected decline in registration following the introduction of IER, for example data-matching schemes and opening up alternative online channels of registration. For the most part, ERS welcomes these proposals; however we do not believe that these measures alone can prevent a potentially catastrophic fall in voter registration during the transition period and beyond.
- 3.6 We acknowledge that the transition to IER is taking place in climate of budget cuts. For this reason we have endeavoured to make a range of recommendations including some which we think could have a significant impact for relatively low expenditure.

4. Funding

- 4.1 The coalition government has made clear that deficit reduction is its most urgent priority. The local government support grant thus falls by 12% in 2011-12.

³ Wolfinger, R. E. & Rosenstone, S. J. (1980). *Who votes?* New Haven: Yale University Press

⁴ The Electoral Commission. *Northern Ireland Desk Research - Final Report* (2003) http://www.electoralcommission.org.uk/_data/assets/electoral_commission_pdf_file/0010/16120/PWCFinalFinal_11397-8960_E_N_S_W_.pdf

⁵ The Electoral Commission. *Northern Ireland Desk Research - Final Report* (2003)

⁶ See, <http://www.parliament.uk/documents/commons/lib/research/rp2005/rp05-015.pdf>

⁷ L. Baston & K. Ritchie. *Turning out or Turning off: An analysis of political disengagement and what can be done about it.* (2004) <http://www.electoral-reform.org.uk/images/dynamicimages/file4de9706c9bf74.pdf>

⁸ The Electoral Commission *Understanding electoral registration: the extent and nature of non-registration in Britain.* (2005) http://www.electoralcommission.org.uk/_data/assets/pdf_file/0020/47252/Undreg-FINAL_18366-13545_E_N_S_W_.pdf

According to the Local Government Association this will equate to a funding gap of £6.5bn in this financial year alone.⁹

4.2 EROs have a statutory duty to compile and maintain accurate and complete electoral registers, and local authorities are required to provide sufficient funds and resources to ensure they do so. However, funding of electoral registration and the costs of elections to local councils is not ring-fenced and there is no dedicated budget. The government has announced it has no plans to penalise authorities which fail to provide sufficient funding and recourses to enable EROs to fulfil their duties.¹⁰ The government has also made clear its view that local government should be more flexible in its decisions to prioritise resources to protect essential frontline services.¹¹ We are concerned that budget cuts will have a negative impact on electoral services at precisely the time when EROs will be expected to do more.

4.3 The government has emphasised participation and accountability in its constitutional reform agenda. The Localism Bill for example states: “local voters [...] need more opportunities in which to make their voices heard.”¹² Hence the Bill contains a package of reforms which include local referendums and elected mayors.¹³ Reductions in electoral services provision will deny many voters the opportunity to make their voices heard, and the disconnect between voters and politicians – exemplified by declining turnout – can only get worse as a result. We believe the government cannot afford not to invest properly in electoral registration and that it should be seen as an essential component in their broader agenda to deliver power to people...

“This Government will transform the state. Reversing generations of centralisation. Putting power into people’s hands. Because the job of government is not to run people’s lives. It is to help people to run their own.”

Nick Clegg, Liverpool, 20 September 2010

4.4 The IER Impact Assessment lays out the estimated cost of data matching schemes.¹⁴ These schemes would allow EROs to access public databases for the purpose of identifying unregistered voters and checking entries for accuracy. If the pilots are deemed to be successful it will be rolled out more widely and may go some way to ensuring more complete and accurate electoral registers. However, it will be down to local authorities to decide whether to use data-matching schemes and the additional costs will ultimately be borne by local authorities. This coincides with the government’s austerity package and cutbacks in the local government support grant.

4.5 In attempting to explain why registration levels have fallen from previous levels in the 1990s, the Electoral Commission states that money saving measures such as stopping door-to-door canvassing and reducing overall amount spent on the

⁹ *Local Government Finance Report 2011-12* 9th February 2011

<http://www.lga.gov.uk/lga/aio/16720540>

¹⁰ HC Written Answers. 6 September 2010, c304W

¹¹ HC Written Answers. 8 Jun 2010, c121W

¹² *Decentralisation and the Localism Bill: an essential guide,*

<http://www.communities.gov.uk/documents/localgovernment/pdf/1793908.pdf>

¹³ *Ibid.*,

¹⁴ Electoral Commission, *Individual Electoral Registration Impact Assessment* (June 2011)

<http://www.official-documents.gov.uk/document/cm81/8109/8109.pdf> p.4

annual canvass may be a contributory factor¹⁵ (personal canvassing is known to raise response rates.¹⁶) This is largely attributed to the availability of postal voting on demand since 2000, which has placed an increasing burden on EROs with little or no extra resources. Reducing expenditure on the annual canvass allowed them to free up resources for managing postal voting, but this has come a cost in the number of registered voters through reduced levels of canvassing.¹⁷ One local authority report from this period justifying the move to an all postal canvass noted that stopping the use of personal canvassers would result in cost-savings of around £15,000 but would see a “potential drop in response of 5–8%”.¹⁸

- 4.6 According to the Electoral Commission’s assessment of performance standards, eight EROs did not meet the standard for house-to-house canvassing in 2010, and three of these have not met the standard for three years in a row.¹⁹ The Commission reports that in discussions, some EROs took the view that house-to-house canvassing was not always feasible due to financial constraints, especially in rural and densely populated areas. Another reason identified for not carrying out a check on all properties was the cost or difficulty of recruiting and retaining canvassers.²⁰
- 4.7 We agree with the Electoral Commission’s view that EROs must provide appropriate resources to support a personal visit even in challenging urban/rural situations. However, we would add that EROs must have adequate resources available to them in order to process increasing numbers of postal votes and for canvassing door-to-door.
- 4.8 In order to encourage participation and assist EROs to fulfil their duties, the Ministry of Justice made available a £2.5m Electoral Participation Fund in the financial years 2007-08 to 2009-10. The fund was under-used and under-publicised: only 73 local authorities applied for grants in 2009-10 totalling £427,000.²¹ Out of the 34 EROs identified by the Electoral Commission as having consistently performed below standard,²² only four made applications to the fund in 2009-10. The fund was terminated in the emergency Budget of 22 June 2010.
- 4.9 It is estimated that approximately 20% of the eligible electorate (7 million voters) will be missing from the register when the switch to IER is made. In order to meet this challenge and ensure that every eligible voter is able to do so in the 2015 General Election, we ask that the government reinstate the participation fund.

¹⁵ Electoral Commission. (March 2010) *The completeness and accuracy of electoral registers in Great Britain*
http://www.electoralcommission.org.uk/_data/assets/pdf_file/0018/87111/The-completeness-and-accuracy-of-electoral-registers-in-Great-Britain.pdf p.42

¹⁶ Devore, D. *Compiling the Electoral register 1996* (1996) London: HMSO.

¹⁷ Electoral Commission. (March 2010) pp.42-43

¹⁸ Ibid.,

¹⁹ Electoral Commission (April 2011) *Report on performance standards for Electoral Registration Officers in Great Britain Third analysis of performance*
http://www.electoralcommission.org.uk/_data/assets/pdf_file/0020/116444/ERO-Performance-Report-Final.pdf

²⁰ Ibid.,

²¹ *Electoral Participation Fund Breakdown by Local Authority*,
www.parliament.uk/deposits/depositedpapers/2011/DEP2011-0983.xls

²² Electoral Commission (April 2011)

This should be widely publicised and EROs should be encouraged to make use of the fund.

5. Threat of Fines

- 5.1 It is currently an offence for electors not to respond to an ERO request for information or to give false information. Any person that refuses to supply information is liable to a maximum fine of £1000. Under the White Paper proposals these fines will be abolished. It asserts that no compulsion should be placed on an individual to register
- 5.2 The consequences of moving from a *de facto* compulsory system of registration to a purely voluntary system as proposed in the White Paper have not been fully explored. Under a completely voluntary system, electors who are reluctant to provide their personal identifier information are unlikely to bother registering. The experience of Northern Ireland is telling when in 2005 approximately 70,000 electors were reinstated onto the electoral register (without personal identifiers) ahead of the General Election and a further 90,000 in December 2005 as an emergency measure in response to a collapse in registration following the adoption of IER.²³
- 5.3 Recent research on the effectiveness of fines for boosting registration rates is not forthcoming, and indeed prosecutions are exceptionally rare. However, the threat of a fine is bound to mean that some electors will respond to an ERO request for information. We believe it is worth maintaining the threat of fines. Removing this one compulsory element in the registration process could have serious repercussions that have so far not been adequately addressed.

6. ERO Performance

- 6.1 Section 9A of the Representation of the People Act 1983, as inserted by section 9 of the Electoral Administration Act 2006 places a statutory responsibility on EROs to maintain complete and accurate voter lists, including making house-to-house enquiries, to ensure that the residents present are correctly included on the register.
- 6.2 Since 2009, the Electoral Commission have measured the performance of EROs against a series of standards.²⁴ In 2010, ten EROs did not meet their obligations on ensuring the completeness and accuracy of electoral registration records.²⁵ EROs who do fail to take sufficient measures to register electors can be convicted of an offence under section 63 of the Representation of the People Act

²³ The Electoral Commission. *Electoral Registration in Northern Ireland: Accuracy and Comprehensiveness Research Report* (2008)
http://www.electoralcommission.org.uk/_data/assets/pdf_file/0009/64872/Accuracy-and-Comprehensiveness.pdf

²⁴ Electoral Commission. *Performance standards for Electoral Registration Officers in Great Britain First analysis of Electoral Registration Officers' performance April 2009*
http://www.electoralcommission.org.uk/_data/assets/pdf_file/0011/74099/ERO-REPORT-FINAL.pdf

²⁵ Electoral Commission (June 2011) p.14

1983. To date, no ERO or electoral official has been fined for failure to discharge their section 9A duty.²⁶

- 6.3 The Electoral Commission can only make recommendations to improve performance and offer guidance on electoral registration practice. It has no power of sanction and cannot make EROs (or Returning Officers) follow their recommendations or comply with any of their guidance. We would, therefore, like to see the Electoral Commission take on the role of an independent regulator, similar to that of OFSTED, with stronger powers to raise standards and the ability to sanction under-performing EROs who continually fail in their statutory duties.
- 6.4 We would also like to see improved best practice sharing between local authorities and EROs. For example, a UK wide conference for heads of democratic services.

7. Transitional Carry-Over Arrangement

- 7.1 The IER Impact Assessment explains the government's preferred implementation method of IER in 2014. All registered electors as of 1 July 2014 will be contacted and invited to register individually. This will be voluntary and if electors fail to do so their names will be carried forward for one year. IER will only be compulsory for new or late registrations. There will be no household canvass in 2014, but this will be retained from 2015 onwards when IER will become compulsory.
- 7.2 An alternative option of holding a household canvass in 2014 and based on the response invite electors to register individually was discounted. The reasons given can be summarised as follows: it might be confusing for voters to have a two-stage process; it might delay the completion of the 2014 register which might pose a risk to the General Election campaign in 2015; a household canvass goes against the principle of individuals taking responsibility for their own registration; and it would cost more money.²⁷ Therefore, a transitional carry-over arrangement would be put into place instead.
- 7.3 We would argue that the estimated 20% gap in completeness of the register poses a risk to the 2015 General Election. A household canvass in 2014 would close the gap by approximately 10%, and ensure that the electoral register would be as accurate and up-to-date as possible for the individual write-out. We would also point out that the problems of a two-stage process, as highlighted in the impact assessment, will be true for the following year(s) as it will be retained from 2015 onwards.
- 7.4 Cost appears to be the principal consideration for the decision not to hold a household canvass in the transition year (an estimated £85.5m net compared to £37.9m net for an individual write-out alone). This is a significant difference, however, we would caution against striving to make savings in this critical year. We believe that a household canvass combined with a voluntary individual write-out in 2014 would be more effective than the proposed transitional carry-over arrangement in ensuring that as many electors as possible will be able to vote in the 2015 General Election.

²⁶ HC Written Answers. 6 September 2010, c298W

²⁷ *Individual Electoral Registration Impact Assessment* (June 2011)

7.5 It remains the case that under our winner-takes-all system, where the majority of constituency seats are rendered safe for one party or another, the power to affect the outcome rests with the minority of swing voters in marginal seats. With the loss of an additional 20% of electors through non-registration, the accumulative effect is to create a democratic wasteland where the ability to influence the important decisions that affect our lives will be concentrated in even fewer hands. Public policy will be skewed in order to win over the small pockets of voters whose votes actually count, while the views and opinions of everyone else will be ignored. This is highly damaging to our political system and we do not believe it is cost-effective to make temporary money saving measures in electoral registration.

8. Election Day Registration

8.1 In Britain, the deadline for registering to vote is currently 11 days before Election Day under the rolling registration method, (the White Paper does not mention whether this will be the case under IER). The final weeks and days of the election campaign period is always the most intense and interesting, so un-registered voters who may have their interest peaked during this time, or have a pang of civic duty will have lost their chance to vote.

8.2 Election Day Registration (EDR), or same day registration, is an innovation that is increasingly being used in the United States in response to some of the lowest registration levels in the democratic world. Currently, nine US states (including the District of Columbia) now have some form of same day voting.²⁸ As the name suggests, EDR would allow voters to turn up at the polling station, register and vote all in one go. There is now a considerable body of evidence to show that EDR increases registration and turnout rates significantly. A fairly typical summary of the literature reveals that a 2-6% increase in registration can be expected as a result of EDR.²⁹ In addition, demographic groups with lower registration rates see the largest gains, especially among those who have recently moved address.³⁰ Dēmos is one of the biggest proponents of EDR in the US. They point out that on average the states with EDR found their turnout rates were 10-12% higher compared to those which did not.³¹

8.3 The theory behind EDR is that it reduces the time, energy and informational costs of voting. This idea is derived from the “Down’s equation” which contends

²⁸ Idaho, Iowa, Maine, Minnesota, Montana, New Hampshire, Wisconsin, Wyoming and Washington DC

²⁹ See, Alvarez, R. M & Nagler, J. (2011) Election Day Voter Registration in California *Demos Policy Brief*. Spring 2011. http://www.demos.org/pubs/CA_EDR_Report-Demos.pdf; Alvarez, R. M., Ansolabehere, S. & Wilson, C. H. (2002) *Election Day voter registration in the United States: How one-step voting can change the composition of the American Electorate*. http://minnesotaindependent.com/wp-content/uploads/2009/10/vtp_wp5.pdf; Briens, C. L. & Grofman, B. (2001) Election Day registration’s effects on US Voter turnout. *Social Science Quarterly*, Vol 82:1, 170 – 181; Fenster, M. J. (1994) The impact of allowing day of registration voting on turnout in US elections from 1960 to 1992. *American Politics Quarterly* Vol 74 22(1)

³⁰ Caltech/MIT Voting Technology Project. *Election Day Voter Registration in the United States* (June 2002) http://minnesotaindependent.com/wp-content/uploads/2009/10/vtp_wp5.pdf

³¹ Dēmos (2009) *Voters Win with Election Day Registration* (Summer 2009) http://www.demos.org/pubs/voterswin_09.pdf

that rational citizens only vote if the benefit of doing so outweighs the cost.³² Wolfinger & Rosenston develop this further and assert that: “registration raises the costs of voting. Citizens must first perform a separate task that lacks the immediate gratification characterising other forms of political expression (such as voting)”.³³ Therefore, the more permissive the registration laws the fewer barriers there are to casting one’s vote. Individual Electoral Registration will certainly increase the costs in voting. However, the ability to register and vote on the same day will go some way to assuaging it.

8.4 There are of course, downsides. Concerns over fraud are a big factor in the debate on EDR in the States, although there is little in the way of documented proof.³⁴ With IER identifiers and proofs of identity this should not be a major issue and is far more secure than the current system. It would also complicate Election Day administration and potentially overwhelm polling station staff without adequate preparation. Staff would have to serve two tasks – registering voters and assisting them as they cast their vote. In the US, some polling stations have “greeters” who help direct voters to a table where they can register or where they can vote. Staff would also need to know where to send voters who turn up to the wrong polling station. There would certainly be other issues to consider, such as whether to provide for provisional ballots to ensure that voters who are unable to prove their eligibility or identity on the day are still able to vote. However, given the success of same-day registration in the US, we strongly recommend that the government gives EDR serious consideration.

9. Registration at Government Offices

9.1 The proposals enabled by the draft legislation makes it possible to integrate electoral registration into other day-to-day transactions with the government. This is common in the United States. US citizens can register in many places: at their county or government registration office; at their motor vehicle agency; at universities; schools and hospitals. The National Voter Registration Act 1993, or “motor voter” law requires states to provide citizens with the opportunity to register or re-register at public agencies when they apply for a driver’s licence or social security benefits. In some ways the law has been very successful: about 40% of US voters register at the Department of Motor Vehicles alone. However, this is not a particularly good measure because it is impossible to know how many of these citizens would have registered in any case.

9.2 Recent studies are not forthcoming, although estimates of the potential effects of the Act suggest a 4% increase in turnout over a span of five elections.³⁵ Highton & Wolfinger conclude that non-political young people in their mid-20s (who are highly mobile and most have driver’s licences in the US) are very susceptible to the Act and therefore stand to benefit most.³⁶ Other writers point out that the law

³² Downs, A. (1957). *An economic theory of democracy*. New York: Harper & Row

³³ Wolfinger, R. E. & Rosenstone, S. J. (1980).

³⁴ U.S. Election Assistance Commission. (2006). *Status report to the voter fraud-voter intimidation research project*. <http://www.usatoday.com/news/pdf/2006-10-11-electionreport.pdf>

³⁵ Knack, S. (1995) Does “motor voter” work? Evidence from state-level data. *Journal of Politics*, 57. 796 – 811

³⁶ Highton, B. & Wolfinger, R. E (1998) Estimating the effects of the National Voter Registration Act of 1993. *Political Behaviour*, Vol. 20, No.2. 79 – 104

has had little clear impact on overall levels of registration and turnout, and note that registration fell after the law was passed and implemented.³⁷

- 9.3 We believe that that there should be as many opportunities to register as possible. Registration forms should be available at all government offices and Post Offices, and electors should be reminded to register to vote in every official transaction – when applying for a passport, drivers licence, social security, registering for council tax, or whatever the transaction might be.

10. Constituency Boundaries

- 10.1 In the UK, we use the registered electorate as a base for measuring constituency size. This is not an unusual approach for drawing parliamentary seats, and compares well internationally.³⁸ However, it does rely on electoral registers being as complete and accurate as possible. With the coalition government committed to redrawing constituency boundaries to reduce their number and equalise their size³⁹ the introduction of IER could have wide reaching effects on how we are represented.
- 10.2 The main administrative factor is that some people who are qualified to vote – for example those who have lived in a whole house for several of years – are easy to get on the register. Other voters, such as young and mobile people, certain ethnic minority groups, private sector tenants, those who live in subdivided accommodation, or people disadvantaged by language and literacy are very difficult to get on the register. The Electoral Commission has identified large-scale under-registration in urban and deprived areas, for example it found that the registration rate in Glasgow City was just 75.7% in 2008.⁴⁰ This suggests that some seats are actually under-represented under the current arrangements. IER will result in much more volatile electoral registers than at present, and it will be on this data that future districting will be based.
- 10.3 We raise this point to highlight how a potential collapse in registration will affect other aspects of the government's constitutional reform agenda, and the importance of ensuring that everything possible is done to ensure the completeness and accuracy of the register.

11. Conclusion

- 11.1 The Electoral Reform Society welcomes the opportunity to input into proposed changes to the electoral registration law, and would be happy to give oral evidence or provide further written materials to the Political and Constitutional Reform Committee. We are keen to assist in any way we can to ensure that the transition to IER will be a success.

³⁷ Alvarez, R. M., Ansolabehere, S. & Wilson, C. H. (2002)

³⁸ See, <http://aceproject.org/ace-en/topics/bd/bdb/onePage>

³⁹ Parliamentary Voting System and Constituencies Act 2011(c.1) London: HMSO.

⁴⁰ Electoral Commission (March 2010) p.59