

# Consultation Response



## Response to consultation on Royal Mail modernisation

**Organisation:** The Association of Electoral Administrators (AEA).

**Summary:** Founded in 1987, the AEA is the professional body representing the interests of UK electoral administrators. We are a non-governmental and non-partisan body with over 2,000 members, the majority employed by local authorities to provide electoral registration and election services. Eleven branches of the Association cover the United Kingdom, including the Scotland and Northern Ireland Branch.

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### Background

The AEA represents electoral administrators who rely on Royal Mail to deliver communications to electors and those registering to vote. Being able to send postal votes, poll cards, applications to vote by post, voter authority certificates, household canvass forms, registration forms and confirmation letters of various kinds is vital.

As well as sending letters, Electoral Registration Officers (EROs) and Returning Officers (ROs) receive correspondence. Elections and electoral registration are governed by strict immovable deadlines. If an application is not received by the statutory deadline ahead of a poll, it cannot be processed.

### Concerns

Ofcom has two primary options for reform:

- “1. Making changes to existing First and Second Class and business products so that most letters are delivered through a service taking up to three days or longer, with a next-day service still available for any urgent letters.
2. Reducing the number of letter delivery days in the service from six to five or three. This would require Government and Parliament to change primary legislation.”<sup>i</sup>

We believe both these suggestions will impact electoral delivery.

## Costs

While ROs and EROs could choose, where necessary, to pay for a next-day service, the cost could be prohibitive for voters. Digital application channels have increased, but many electors, and political parties, are still using paper forms sent through the post.

Local authorities and central governments fund elections and electoral registration. The ever-reducing public purse could lead to difficult decisions about the next-day service. While accepting different products mean reductions are available for bulk mailing, a first-class stamp is currently £1.25. Guaranteed next-day delivery is £6.85<sup>ii</sup>. That is a 548% increase.

## Delivery days

Reducing delivery days could majorly impact ROs' ability to deliver postal votes. It could see electors disenfranchised due to postal timetables.

While many communications could be delivered within a three-day timeframe, postal votes are sent first class. They need to arrive with electors in time for them to be returned to the RO by the close of poll. They are issued anywhere from seventeen working-days before an election to five working-days before. At the 2019 UK Parliamentary general election, 8,034,718 electors were issued with a postal vote<sup>iii</sup>.

Postal votes can be identified. Both incoming and outgoing envelopes have purple flashing to aid Royal Mail mail centre sweeps. However, even with this identification, if there are no planned deliveries a ballot paper cannot reach an elector.

Since the introduction of voter identification in polling stations, electors can apply for a voter authority certificate (VAC). If they do not have access to other forms of acceptable photo ID, these certificates are the only way someone will be able to prove their identity on polling day. The deadline for VACs is just six working-days before the election. Depending on the delivery schedule for the elector, and how quickly the certificate can be printed and issued, it is not unreasonable to think it may not reach them in time.

We would like to assume Royal Mail will be able to prioritise deliveries to ROs and EROs. At certain times of year, it would be imperative mail is delivered daily regardless of the service chosen by the sender.

## Conclusion

The UK's electoral system relies on Royal Mail. It relies on timely deliveries of vital information. It relies on postal voters trusting their vote to the universal postal service.

We are concerned any changes to the products offered by Royal Mail, or how often they deliver, could adversely impact the UK's electoral system.

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<sup>i</sup> The Royal Mail is a public body established under the Royal Mail Act 2010. It is a company limited by guarantee, registered in the England and Wales, number 2406897. Its registered office is at Gibson House, Hurricane Close, Stafford, England, ST16 1GZ.

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