The Electoral Commission

Response to Ofcom's call for input on the future of the universal postal service

19 March 2024

Introduction

1. The Electoral Commission is the independent body which oversees elections and regulates political finance in the UK. We work to promote public confidence in the democratic process and ensure its integrity, including by enabling the delivery of free and fair elections and referendums.

2. Our response to [Ofcom's call for input on the future of the universal postal service](#) focuses on an aspect of the universal postal service not covered specifically by the questions in the response form, nor in detail in the consultation paper. This relates to its aim to facilitate key interactions between citizens and the state and the central place that the UK's electoral processes occupy in that context. Our response highlights the following specific points:

    -   The extent to which electoral processes essential to the effective functioning of UK democracy are dependent on reliable and efficient postal services. This includes participation by voters (postal and polling station voting), campaigning by candidates and electoral registration.

    -   The time critical nature of many election-related processes. Elections in the UK are run according to statutory election timetables, with set timescales and fixed deadlines. A reliable postal service is an essential requirement during an election period and at other fixed points in the electoral cycle, such as the annual canvass.

    -   The need for electoral processes that rely on the postal service to be protected or enhanced in any proposals to modernise the universal postal service. This must include the continuation of a coordinated management approach. Elections are a 'no fail' service. It is vital to recognise the key role that the postal service will continue to play in supporting UK democracy.

Electoral processes are highly dependent on the universal postal service

Postal voting

3. Anyone registered to vote in Great Britain (not in Northern Ireland) can apply for a postal vote at any time, and postal voting is a popular and key part of democratic participation. At the December 2019 UK Parliamentary General Election (UKPGE), 17.2% of voters were issued with a postal vote. This amounted to around 8.2m

postal votes being distributed across the UK's 650 constituencies. Approximately 6.9m postal ballots were returned, a turnout of 84%. Postal voter turnout remains higher than those who vote at polling stations.

4.   At the May 2021 Scottish Parliament election 24% of the electorate were registered for a postal vote. At the May 2021 elections in Wales (Senedd and Police and Crime Commissioners) 19.2% of the electorate were issued with a postal vote.

5.   The popularity of postal voting varies significantly by area. For example, some constituencies in England (notably in the North East) at the 2019 UKPGE saw between 41% and 44% of voters being issued with a postal vote, while others (e.g. in the West Midlands) had much lower proportions of postal voters (below 10%).

6.   The secure and accurate delivery and return of postal voting ballot packs is a complex logistical exercise. Many Returning Officers rely on Royal Mail to do this. Postal ballot packs are also sent abroad to overseas voters. At the 2019 UKPGE the Cabinet Office and Royal Mail put in place a system for faster delivery of postal ballot packs to overseas electors.

7.   Royal Mail currently offers a dedicated postal voting service for Returning Officers. This includes options for the distribution and return of postal ballot packs, including polling day sweeps designed to capture last-minute returns on polling day.

8.   Since October 2023 people have been able to apply online for a postal or proxy vote for some elections, in addition to the traditional paper form. The added convenience of the online service could lead to an increase in the number of postal vote applications received, particularly in the immediate run-up to elections. This highlights the importance of having a universal postal service that is agile and flexible enough to respond to any future spikes in demand.

Poll cards

9.   Returning Officers are required by law to send out a poll card to each voter (or their proxy) as soon as practicable after the publication of notice of election. Poll cards provide crucial information, such as when to vote and at which polling station.

10.   There were approximately 47.6m people registered to vote at the 2019 UKPGE. This gives a sense of the scale of the poll card delivery operation, with many Returning Officers using Royal Mail to deliver them within agreed timescales.

Voter Authority Certificates

11.   Since 4 May 2023, voters in Great Britain have been required to present photo ID when voting at a polling station for some elections. Voters who do not already have one of the accepted forms of photo ID can apply free of charge for a Voter Authority Certificate (VAC), which can be used as photo ID when voting at a polling station. This is a new, additional election-related process reliant on the universal postal service.

12.   Once a VAC application has been processed and approved the document is printed and sent to the person by post, unless they make a specific request to collect the document in person. The delivery of VACs during the election period is time critical since it must be delivered to the applicant in time to be used on polling day.

13.   At the May 2023 local elections in England approximately 89,500 people applied for a VAC before the deadline at 5pm on the sixth working day before polling day. Demand for VACs is likely to be higher at UKPGEs.

Candidate mailings

14. Candidates at UKPGEs are entitled to free postage on a communication to voters in the constituency. These are delivered by Royal Mail. 3,320 candidates stood for election at the 2019 UKPGE, an average of 5.1 candidates per constituency.

15. In addition, election address booklets must be produced and delivered to voters for certain UK elections – for example, combined authority mayoral elections, local authority mayoral elections and London mayoral elections.

Annual canvass communications

16. Every autumn, Electoral Registration Officers (EROs) must contact all residential addresses in their area to help establish if the information on the electoral register is complete and accurate. The revised register is normally published by 1 December.

17. EROs use a range of communication channels to conduct the annual canvass, but it is a further essential part of the electoral process which is still heavily reliant on Royal Mail to deliver and return printed canvass communications.

Electoral processes are time-critical

18. Key aspects of the electoral process have to be completed within a specific and often very tight timeframe, often defined in law. Statutory election timetables set out when the election formally starts and when polling day must be. The election timetable is a relatively short window – e.g. 25 working days for a UKPGE.

19. Within the timetable there are deadlines by which certain processes must be completed, and only after which certain things can happen. For example, postal votes can only be issued after the details to be printed on the ballot paper have been confirmed, i.e. after the list of candidates is set, which for a UKPGE is 4pm on the 19th working day before the poll.

20. The early dispatch of postal votes will maximise the time available for voters – especially overseas and service voters – to receive, complete and return their postal votes. However, postal vote applications can be made until 5pm on the 11th working day before the poll. Postal votes are therefore dispatched at various stages in the election timetable and must be returned by the voter by 10pm on polling day.

21. Voters in Great Britain can apply for a VAC up until 5pm on the sixth working day before polling day. These are expected to be printed by the supplier within 1-2 working days and then delivered directly to the applicant first class by Royal Mail.

22. Poll cards must also be sent out as soon as practicable after the publication of the notice of election. This is to ensure that voters have the information they need and within time to cast their vote, to change their registration details, or apply for a postal or proxy vote. Candidate mailings must also be delivered ahead of polling day. We know that it can take Royal Mail up to three working days to deliver addressed mailings and up to seven working days to deliver unaddressed mailings. Any reforms which lengthen delivery timescales could negatively impact the ability of voters to cast their vote.

23. In practice the formal election timetable amounts to an intense and time critical period for those running elections and for the postal service, and any delays in agreed timescales can have a material impact on voter participation and campaigning. A reliable, properly resourced and dedicated universal postal service during this period is essential to the smooth running of elections.

Electoral processes must be protected or enhanced in any proposals to reform the universal postal service

24. We note that Ofcom is inviting views on a range of options for 'redesigning the universal postal service to secure its future, while ensuring it reflects the way people use it' and its statement that 'under any scenario, Royal Mail must modernise its network, become more efficient and improve its service levels'.

25. While we do not have views on any options for reform, it is essential that any amendments or redesign of the universal postal service should take into account the following:

   - The extent to which UK electoral processes will continue to be dependent on the provision of a universal postal service.

   - The time critical nature of electoral processes and the need for any reformed universal postal service to be designed with this in mind.

   - The need to protect or enhance the key role that a universal postal service plays in supporting the UK democratic process.

   - The importance of ensuring that there continues to be a coordinated management approach to support the universal postal service in fulfilling its responsibilities in relation to elections. This should include the core elements of the current management system operated by Royal Mail: a dedicated election infrastructure, management leads, regional support structures and well-developed contingency plans.