Response to Ofcom's consultation: Review of the universal postal service and other postal regulation

10 April 2025

> 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.

Overview

1. This response to Ofcom's consultation, Review of the universal postal service and other postal regulation, builds on our response to Ofcom's 2024 call for input on the future of the universal postal service. It is informed by our expertise and experience in overseeing elections and referendums across the UK, including at the 2024 UK Parliamentary general election (UKPGE).

2. Ofcom's consultation proposes several changes to the Universal Service Obligations on the Royal Mail, including limiting delivery of second-class post to alternate weekdays, and reducing the targets for next-day delivery of first-class post and three-day delivery of second-class post.

3. Our response focuses on a significant aspect of the universal postal service not covered in the consultation. This relates to the crucial role the postal service plays in facilitating key interactions between voters, political campaigners and electoral administrators, which are essential to the effective functioning of the UK's electoral processes and democracy.

4. We are aware that other electoral organisations such as the Association of Electoral Administrators have submitted detailed responses on the impact of specific aspects of the proposed reforms. Our response highlights wider evidence that demonstrates the following important aspects of the role of the UK postal service in the delivery of elections:

   - **Electoral processes are dependent on reliable and efficient postal services throughout the year.** This includes participation by voters (postal and polling station voting), campaigning by candidates, and the work of electoral administrators (including electoral registration, communicating with electors, running elections and referendums).

   - **Many election-related processes are time critical.** 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, at other fixed points in the electoral cycle, such as the annual canvass, and to support unscheduled polls year-round.

   - **Electoral processes that rely on the postal service must be protected or enhanced in any proposals to modernise the universal postal service.** Any

changes to the universal postal system must not impact on its ability to reliably support elections with agility and flexibility.

5.   The proposed reforms are likely to have significant implications for the management and funding of elections across the UK. The Royal Mail's dedicated management approach to elections, developed and refined over several years, has been essential and effective in managing the role of the postal service in the delivery of elections across the UK. Any proposals to modernise the universal postal service must ensure that electoral processes can continue to depend on an agile, flexible and reliable universal postal service.

6.   The UK's governments may need to increase the funding they provide to Returning Officers in order to maintain the speed and reliability of postal service that is required to ensure voters receive election documents and information in time to allow them to participate. Local authorities may also need to increase funding available to Returning Officers for running local government elections.

Electoral processes are highly dependent on the universal postal service

7.   Each stage of the UK's electoral process involves the production and distribution of correspondence, sent through the domestic (and in some cases, the international) postal network. These elements include sending poll cards to voters; applications for and the return of postal votes; Voter Authority Certificates; information booklets and leaflets from the Electoral Commission or Returning Officers; campaign material from political parties or candidates; and electoral registration communications.

8.   We are concerned that the proposed changes to the second-class delivery service and reduction in delivery targets for first-class and second-class post, will cause delays in vital correspondence reaching electors. Such delays may result in electors having insufficient time to act and therefore may prevent people from casting their vote at an election.

Poll cards provide voters with essential time critical information

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 the notice of election. At the 2024 UKPGE, Royal Mail reported that they delivered 50.8m poll cards (including replacements and proxy poll cards), giving a sense of the scale of the poll card delivery operation, with many Returning Officers using Royal Mail to deliver them within agreed timescales.

10.   Poll cards provide crucial information, such as when to vote and at which polling station. For postal or proxy electors, poll cards confirm their current absent voting arrangement, providing essential information about how to make a change, update or make an absent vote application and communicating statutory deadlines.

11.   Furthermore, poll cards inform electors about the need to show voter identification at relevant elections and provide Returning Officers with an opportunity to raise awareness among disabled voters about any accessibility support available at the polling station, and how they can request additional support or equipment. Poll cards serve a vital function in our electoral system by ensuring electors, including the digitally excluded, receive the information they need to be able to participate.

12. The electoral timetable is set by law. A responsive and efficient service that delivers poll cards at short notice is essential to allow voters time to make necessary arrangements to allow them to cast their ballot and any delay in the delivery of poll cards will impede participation. Voters need sufficient time to:

- determine whether they have valid ID or need to apply for a Voter Authority Certificate;
- understand what accessibility support is available or make an application for a reasonable adjustment; or
- apply for an absent vote.

13. These limits in the timetable can be felt particularly acutely when a UKPGE is called unexpectedly or during a holiday period, as was the case at the 2024 UKPGE, leaving voters with little notice to act.

Postal voting aids participation

14. Anyone registered to vote in Great Britain can apply for a postal vote at any time, and postal voting is a popular and key part of democratic participation. Postal voting on demand is not available in Northern Ireland. We saw an increase in postal voting at the July 2024 UKPGE:

- 19.9% of voters across the UK were issued with a postal vote, up from 17.2% at the previous UKPGE in December 2019.
- This amounted to approximately 9.6m postal votes being distributed across the UK's 650 constituencies, up from 8.2m postal votes in 2019.
- Approximately 7.7m postal ballots were returned, a turnout of 81% (6.9m and 84% respectively in 2019). Postal voter turnout remains higher than those who vote at polling stations.

15. A similar trend can be observed at devolved elections. At the May 2021 Scottish Parliament election, 23.7% of the electorate were registered for a postal vote, amounting to over one million postal ballot packs distributed. At the May 2021 elections in Wales (Senedd and Police and Crime Commissioners), almost half a million people (19.2% of the electorate) were issued with a postal vote.

16. 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 2024 UKPGE, Royal Mail and the British Forces Post Office (BFPO) provided facilities to help expedite the dispatch of postal ballot packs to overseas addresses and BFPO addresses.

17. 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.

18. Postal ballot packs are not processed and issued 'on demand'. They are processed, printed and dispatched in batches. At the 2024 UKPGE, there were 1.3 million postal vote applications in Great Britain between the election being called on 22 May and the deadline on 19 June; this included nearly 470,000 in the final five days leading up to the deadline, when existing postal voters were starting to receive their postal ballot packs. Postal ballot packs need to be sent to electors and then returned. The more applications processed near to the election, the more postal votes will arrive

with voters close to polling day – and the greater the risk of delays in dispatch meaning some people are unable to vote. The universal postal service should be agile and flexible enough to respond to any future spikes in demand.

19. At the July 2024 UKPGE, some areas, notably Scotland and parts of England, had problems with suppliers printing and dispatching postal ballot packs. These issues, in combination with the volume of postal vote applications near to the deadline and the tight electoral timetable, resulted in delays which affected some electors' ability to vote. To mitigate the impact of the issues affecting print suppliers in Scotland, Royal Mail arranged for additional vans to collect the delayed packs from printers in England and deliver them to Scottish local authorities. This ability to respond in real time to problems arising during an election period is a vital part of the service provided by Royal Mail and is an essential factor in ensuring that elections continue to be delivered successfully.

20. Since October 2023, electors have been able to apply online for an absent vote (a postal or proxy vote) for some elections, in addition to the traditional paper application form, and legislation is currently passing through the UK Parliament to extend online absent vote applications to devolved elections in Scotland and Wales. The added convenience of the online service could lead to an increase in the number of postal vote applications received and consequently, an increase in postal vote packs issued, particularly in the immediate run-up to elections.

21. Many electors, including those who are digitally excluded, continue to apply for absent votes through the post. During the period between the election being called on 22 May and the deadline on 19 June, almost 170,000 paper applications were made (14.4% of the total absent vote applications made during that period). As the application form must first be posted to the Electoral Registration Officer (ERO) before it can be processed, several additional days are required before a postal ballot pack can be issued and then in turn, completed and returned through the post to be counted.

Voter Authority Certificates allow those without photo ID to vote in person

22. 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.

23. Electors can apply for a VAC until 5pm, six working days prior to the relevant polling day. Once a VAC application has been processed and approved, the document is printed by a centrally procured supplier, appointed by the UK Government. VACs should be printed within one to two working days of each applicant's details being sent to the supplier and then sent to the voter 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.

24. Approximately 210,000 people applied for a VAC between January 2023, when the application service launched, and 26 June 2024, which was the application deadline for the UKPGE. Of these, around 57,000 applications were submitted once the

general election was called. Were there to be any delay in delivering the VAC, these electors could be prevented from casting their vote.

Candidate and election mailings help voters make an informed decision

25. Candidates at UKPGEs and at Senedd elections are entitled to free postage on a communication to voters in the constituency. This is known as an 'election address' or 'election communication' (a leaflet). The address must only include information relating to the election and is delivered by Royal Mail. At the 2024 UKPGE, 4,515 candidates stood for election, an average of 6.9 candidates per constituency. This was an increase of almost 1,200 candidates from those who stood in 2019 (3,327). Of the candidates who responded to our survey after the 2024 UKPGE, around three quarters told us they sent out leaflets as part of their campaign, both using Royal Mail's free election address (75%) and paying for postage themselves (78%).

26. In addition, mayoral election address booklets must be produced and delivered to voters for mayoral elections in England, including combined authority, local authority and London mayoral elections. At the 2024 London mayoral election, the Greater London Returning Officer sent over six million booklets to registered electors across the capital.

27. The Electoral Commission also produces booklets, which are posted to every household, providing impartial information ahead of Senedd elections in Wales, local and parliamentary elections in Scotland, and national referendums. In 2021, the Commission sent out 1.429m information booklets to households in Wales ahead of the Senedd election and in 2022, sent 2.5m booklets to households in Scotland for the Scottish local elections. Booklets will be sent to households across Scotland and Wales at the 2026 parliamentary elections and at the 2027 Scottish local elections. We rely upon timely postal services to consistently distribute these publications to support our role in providing impartial information on the election and to aid voter participation.

Annual canvass communications ensure people register to vote

28. 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. This process is known as the annual canvass. The revised register is normally published by 1 December.

29. 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.

30. In addition to the canvass, there are a range of other activities which require EROs to write to electors at various points throughout the year. These include renewals for postal and proxy votes and for overseas elector declarations.

31. Each of the above electoral processes results in vast quantities of correspondence being sent through the universal postal system and their efficacy is dependent on reliable and efficient postal services.

Electoral processes are time critical

32. Electoral processes are complex and interrelated. To be able to vote, electors must first be registered, have specified identification for some elections and may need to apply for an absent vote. Campaigners and electoral administrators must also be able to supply voters with information to help them make an informed decision and confidently complete their ballot paper. Voters have limited time to act once an election is called and they rely on the postal service to efficiently deliver the correspondence they need in time to participate.

33. Key aspects of the electoral process must 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.

34. Within the timetable there are deadlines by which certain processes must be completed, and only after which certain things can happen. For example, postal vote packs 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.

35. Some postal vote packs are dispatched early to 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 vote packs are therefore dispatched in different batches within the election timetable and must be returned by the voter by 10pm on polling day.

36. 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 central supplier within one to two working days and then delivered directly to the applicant first class by Royal Mail to allow the voter to use it on polling day.

37. 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 with sufficient 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.

38. 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.

39. Whilst the first Thursday in May is usually synonymous with polling day in the UK, unscheduled polls (e.g. by-elections) take place throughout the year, adding pressure to electoral administrators and the services they rely on. In 2024, multiple elections were held during every single week of the year until Christmas week. Elections in 2025 are proceeding at the same rate. At each electoral event, voters, campaigners and administrators rely upon the universal postal service to respond to deliver vital correspondence swiftly, so that no-one is prevented from participating.

40. Democratic participation would be affected by any failure of the postal service to fulfil its essential role in the complex electoral system – ensuring that electors receive necessary documents in time to act upon them. Failure to deliver vital information from campaigners or electoral administrators may impede voters making an informed decision or understanding how to complete their ballot paper, while some may be prevented from being able to vote at all, should their postal ballot pack or VAC not arrive in time for polling day.

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

41. It is vital to recognise the key role that the postal service will continue to play in supporting UK democracy.

42. The UK electoral system depends upon a reliable and swift universal postal service. If the proposals to reduce second-class delivery to only alternate weekdays go into effect without modifications being made to support the delivery of electoral correspondence, the late arrival of key documents could prevent electors from exercising their vote. For example, instead of on Saturday, a document posted second-class on a Wednesday may not be delivered until the Tuesday of the following week.

43. Limiting second-class delivery to alternate weekdays and reducing the target for mail delivered within three days may cause Returning Officers to send all electoral correspondence first-class, which would increase costs. Although the UK Government pays the costs of postage at parliamentary elections, this is not the case for local government elections. This could result in a two-tiered electoral service, where local authorities may be forced to choose a slower service for council elections to reduce costs.

44. This would be unacceptable. To mitigate this risk, governments may need to take proactive steps to ensure a fully voter-focused postal voting system. This might require governments to fund the quickest, most reliable service for all postal voting documents (including both delivery to voters and return to Returning Officers), using tracking technology to enable voters to understand where their postal votes are in the system, as well as other key electoral correspondence. This approach might also be needed to ensure the timely delivery of other critical election correspondence, such as poll cards.

45. Over several years, Royal Mail has developed and refined a dedicated, co-ordinated management approach to elections, the core elements of which include a dedicated election infrastructure, management leads, regional support structures, well-developed contingency plans, and support to produce bilingual election material in Wales. This structure has been essential and effective in managing the role of the postal service in the delivery of elections, including the ability to escalate and resolve issues in an agile way in the live election environment. Any proposals to modernise the universal postal service should ensure that electoral processes can continue to depend on an agile, flexible and reliable universal postal service.